

Statement of Consultation on the Draft Local Plan

November 2017



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Reading
Borough Council

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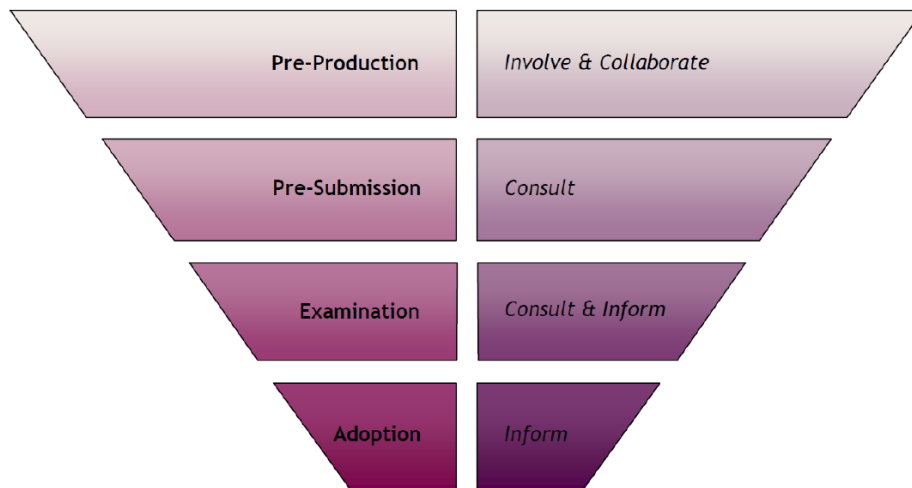
1.0 INTRODUCTION

- 1.1 The consultation that took place in May and June 2017 related to the new Local Plan for Reading. It was decided to proceed with a new comprehensive Local Plan to replace the three existing development plan documents (the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document), particularly in view of changes that were made in the 2012 National Planning Policy Framework. A new Local Development Scheme was produced in 2013 (and updated in 2014 and again in 2016) which set out this intention.
- 1.2 The first consultation stage was on Issues and Options. Rather than a draft plan, this was a discussion paper that highlighted the important questions that inform what the plan should contain and how it should address the key matters. The Issues and Options document was particularly informed by the Berkshire Strategic Housing Market Assessment, which identified the level of objectively assessed housing need for Reading. The Issues and Options document also identified possible sites for inclusion in the draft plan.
- 1.3 This second consultation stage was on the Draft Local Plan. This document was a full draft, after taking account of all the comments received during the Issues and Options consultation as well as other emerging information. Supporting documents such as a Proposals Map, Sustainability Appraisal and Infrastructure Delivery Plan were also made available for comment.
- 1.4 The Strategic Environment, Planning and Transport Committee approved the Draft Local Plan for consultation on 4th April 2017 and it was published Wednesday, 3rd May alongside the supporting documents mentioned above. Consultation ran to 14th June 2017.
- 1.5 The next stage will be to produce a Pre-Submission Draft Local Plan that will be subject to another consultation starting in November 2017. It is expected that submission, examination and adoption will occur in 2018-2019.

2.0 DETAILS OF CONSULTATION

- 2.1 Consultation on the Draft Local Plan, along with the accompanying Proposals Map, Sustainability Appraisal and Infrastructure Delivery Plan, began on Wednesday 3rd May and lasted until Wednesday 14th June 2017, a period of six weeks.
- 2.2 In terms of an approach, the consultations on planning policy documents need to be undertaken in line with the Council's adopted Statement of Community Involvement (SCI). The latest version of Reading's SCI was adopted in March 2014.
- 2.3 The SCI sets out some general guidelines for how consultations on the local plan should take place, with the main principle being involving stakeholders at the earliest stage. Figure 1 shows the general approach to each stage of consultation.

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



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

- Directly emailing over 1000 contacts on the Council's consultation lists, including statutory consultees, adjoining local authorities, Parish Councils, community and voluntary groups, commercial organisations, businesses and interested individuals. The full list of those consulted is in Appendix 1, the text of the email is set out in Appendix 2, and the summary leaflet that was attached to the email is included in Appendix 3;
- Documents (including the Draft Local Plan, Sustainability Appraisal, Proposals Map, Infrastructure Delivery Plan and summary leaflet) being made available on the Council's website;
- Copies of the summary leaflet and of the Draft Local Plan being made available at Reading Borough Council libraries;
- A press release was also prepared and distributed (see Appendix 4). From this, articles on the Local Plan appeared in the local press (www.getreading.co.uk) (see Appendix 5); and
- Two drop-in events, where members of the Planning team were on hand together with exhibition boards (see Appendix 6) to discuss any issues arising, held at Reading Civic Offices on Monday 15th May and Tuesday 23rd May.

3.0 RESULTS OF CONSULTATION: DROP-IN EVENTS

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

4.0 RESULTS OF CONSULTATION: WRITTEN RESPONSES

4.1 The Council received over 150 written responses to the Draft Local Plan (although one of these was a petition with 317 signatures). These responses came from a mix of individuals, community groups, landowners and developers and other local authorities and public sector organisations. The responses that were received were in general quite detailed, and a total of 1,300 individual comments were made. Some of the main points raised are set out below:

- Generally, there was support for trying to accommodate the need for 658 homes per annum from the development industry. Adjoining authorities noted the position regarding the expected unmet needs.
- Many individuals expressed support for encouraging higher density growth in the town centre, while some individuals expressed concern about the number of flats planned and the need for more family housing, as well as affordability concerns.
- Many developers requested more flexibility, particularly with regard to energy efficiency, design and affordable housing. Additionally, some developers consider the requirement of employment development to mitigate impacts on housing to be onerous.
- A number of developers encouraged the Council to consider a Private Rental Sector policy in order to encourage build-to-rent properties.
- Many individuals expressed concern about the impacts of new development on existing infrastructure, citing traffic congestion, limited school places and crowded GP surgeries.
- In terms of sites allocated for development, the sites that generated the largest volume of responses (most opposing development), were
 - Land at Armour Hill (WR3t)
 - Part of Reading Golf Course at Kidmore End Rd (CA1b)
 - Park Lane Primary School, the Laurels and Downing Road (WR2)
 - Arthur Hill Swimming Pool (ER1h)
- Many developers and landowners who had put forth sites earlier in the process responded with support, sometimes with additional information.
- Some individuals expressed concerns about the impacts of tall buildings on the character of the town, as well as on panoramic views.

- Some landowners and developers sought to advocate new sites not included in the Draft Local Plan. These were:
 - Land at Green Road and Wokingham Road
 - Cantay Business Park at Hardy Close
 - Land rear of 10-32 Clifton Street
 - 15-18 Friar Street, 2-16 Station Road and the Harris Arcade
 - Great Brigham's Mead, Vastern Road
 - 64 St. John's Road, Caversham

- Some landowners and developers advocated other sites located just outside Reading's boundary, around Grazeley in Wokingham Borough and around the edges of Caversham and Emmer Green in South Oxfordshire District, as potential sites to help meet Reading's housing need.

- Numerous individuals and community groups expressed strong support for retention and improvement of existing open spaces. A number of responses were in relation to identification of sites as Local Green Space. The sites most frequently listed were:
 - Various allotment sites
 - Mapledurham Playing Field

- Many organisations and individuals supported greater recognition of Reading's waterways and active use of waterside areas. There were varied views on whether there should be a protected natural buffer along waterways.

- There were a number of detailed technical comments on the environmental policies from respondents such as the Environment Agency, Natural England and the Council's own Environmental Protection Team

- Many individuals expressed the need for affordable and accessible leisure provision throughout the Borough and frustration at the loss of the Arthur Hill Swimming Pool.

- Historic England, community groups and individuals were pleased with the greater emphasis placed on heritage within the Local Plan. A number of in-depth responses to the issue of how Reading should plan for the historic environment were received. These also cover matters with implications beyond the Local Plan process. The following were the main issues raised:
 - Completing Conservation Area appraisals, developing action plans and adding new or extending existing Conservation Areas;
 - Preventing further decline of Chazey Farm Barn, a grade I listed building at risk;
 - Further use of Article 4 Directions in order to protect amenity, particularly with regard to HMOs;
 - Improving the website to provide heritage guidance for landowners and residents; and

- Improving the List of Locally Important Buildings.

4.2 A summary of each individual representation is included in Appendix 7 to this document.

5.0 EVALUATION OF CONSULTATION

- 5.1 Generally, the approach to the consultation on the Draft Local Plan was considered to be reasonably productive, in view of the resource constraints for carrying out such a consultation, particularly in terms of officer time. Whilst larger numbers of responses have been received in the past, in practice this has often been because a specific site proposal had resulted in a large number of responses making almost identical comments, which was less prominent this time around. There would certainly have been measures that would have brought a greater response, but that needed to be weighed up against limited resources and the fact that many of the policies and sites had been consulted on relatively recently. With 150 responses received, this is somewhat lower than the 200 or so received to the Issues and Options consultation, but this is in line with the approach of carrying out the widest public consultation at the earliest stage.
- 5.2 Attendance at the drop-in events was low compared to previous years. This may have something to do with a greater proportion of people being able to access information on the internet. However, it may still be worth continuing to offer this facility in future years for those who do not have web access or who want to discuss matters in detail.
- 5.3 Some comments in Appendix 7 refer to the consultation methods. The Council will respond to these detailed points when it responds to all other matters in editing the draft plan before the next consultation.

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

Abracad
Access & Planning (Education\Strategy & Planning
Access Architects
ADS
Age UK Reading
Alan Penton
Alastair Bainton
Alastair Letchford
Alex Hill
Alex Jackman
Alexandra Hemming
Alison Bond
Alistair Appleton
Alliance Environment And Planning Ltd
Amir Laghaei
Andrea Warner
Andrew Clifton And Annette McCartney
Andrew Edwardson
Andrew Scott
Andrew Tudor
Angela Macdonald
Anita Soulsby
Anna Gargan
Anna Stott
Anne and Derek White
Anne Davis
Arcus Consultancy Services Ltd
ARD Chartered Architect
Armstrong Rigg Planning
Arqiva Limited
Art R Miller
Assael Architecture
ATP Group Partnership
Aviva Life Pensions UK Ltd
Banner Homes
Barbara Garden
Barclays Bank Plc
Barton Willmore
Basingstoke & Deane Borough Council
BBOWT
BDO Stoy Hayward LLP
BDS Surveyors Ltd
Beard Construction
Bell Cornwell Partnership
Bell Tower Community Association
Bellway Homes Ltd (Thames Valley)
Ben Fox
Benchmark Planning
Berkshire Archaeology
Berkshire County Blind Society
Berkshire Local Nature Partnership
Bethan Howard
Bewley Homes
Blandy And Blandy
Bluestone Planning Ltd
Bob Tarling
Boyer Planning
Boyes Turner
Bracknell Forest Council
Brian Jamieson
Briony And David Downey
British Sign And Graphics Association
Britt Bjoro And Dave Long
Broadway Malyan
Brook Henderson Group Limited
BT Repayments Planning Department
Buckinghamshire County Council
Bucknell Family - Global Futures Limited
Building Control (Internal)
Building Design
Burghfield Parish Council
C M Makin
CABE
CADRA
Caldecotte Consultants
Campbell Gordon
CAMRA
Carol Mclellan
Carol Morton
Carolyn Davidson
Carter & Son (Thatcham) Ltd
Catherine Place Properties
Cathy Szklar
Caversham Globe
CBRE
Cedarmart Ltd
CEMEX
CgMs Consulting
Chair, Reading Chamber Of Commerce
Chillingham Limited
Chris Thomas Ltd
Church Street Baguettes
Civil Aviation Authority
Clair Drever
Claire Weaver
Clive Bedford
Cllr Daisy Benson
Cllr Ed Hopper
Cllr James Anderson
Cllr Jan Gavin
Cllr Kelly Edwards
Cllr Marian Livingston
Cllr Matt Rodda
Cllr Melanie Eastwood
Cllr Mohammed Ayub
Cllr Paul Woodward
Cllr Rachel Eden
Cllr Rebecca Rye
Cllr Ricky Duveen
Cllr Rob White
Cllr Rose Williams
Cllr Sandra Vickers
Cllr Sarah-Jane Hacker
Cllr Thomas Steele
Cllr Tony Jones
Coppid Farming Enterprises c/o Savills
Corporate Procurement Level 7
Country Land and Business Association
CPRE Berkshire Branch
Creative Design and Structure Ltd
Crest Nicholson Ltd
Cristo Design
CSJ Planning Consultants
Cumming Anderton Architects

D J Bailey
D2 Planning
Dalgleish And Co
Daniel and Gilbert/Weldale Caversham Ltd
Daniel Andrews
Daniel Patrick Russell
Date Newnham
David And Gaylene Shepherd
David Bailey
David Birkett Associates
David Cooksley Associates
David Griffiths
David Lock Associates
David Parsons
David Richmond
David Syrad Architects
Day Tanner Partnership
De Merke Estates Ltd
Deborah Dadd
Defence Estates Head Office
Deloitte Caroline McDade
Denis King And Gillian King
Denton And Gibson Ltd
Disabled Access Group
Doctor Abigail Macleod
DPDS Consulting Group
Dr Adrian Tompkins
Dr And Mrs Caithness
Dr Andrew Smith
Dr Antony Cowling
Dr Carol Brickley
Dr Caroline Charles
Dr Chris Howlett
Dr John Partington
Dr Kevin Blackburn
Dr Mani Karim
Dr Maria Pletnikova
Dr Megan Aldrich
Dr Neil Buchan
Dr Samantha Coates
Drews Limited
Drivers Jonas Deloitte
DTZ Piedad Consulting
Dunster And Morton
Earley Town Council
Edgington Spink And Hyne
Edwards Irish Partnership
Elaine Murray
Eleanor Pitts
Elisa Miles
Emma Rawlinson
Emmer Green Residents Association
Environment Agency Planning Liaison
Estates Manager First Great Western Trains
Evelyn Williams
Eye And Dunsden Parish Council
Federation Of Small Businesses
Federation Of Tenants & Residents Associations
Fields In Trust
Firstplan
Foster Wheeler
Foudry Properties
FPD Savills
Frances
Francis Brown
Freshwater Group

Friends of Caversham Court Gardens
Friends Of The Earth
Friends, Families And Travellers
Fusion Online Limited
G J Grashoff And A B Grashoff
G Moffett
Gareth Warwick
George Bickerstaffe
Gillian and Denis King
Gillian Andrews
Gillian Makin
Gladman Developments
Globe-Newtown
Goodman
Goodman International Ltd
Graham Griffiths
Graham Ritchie
Green Health Reading
Greg Farrell Building And Design
Greg Lewis
Gregory and Andrea Grashoff
GVA Grimley Ltd
Hallam Land Management Ltd
Halsom Mackley Partnership
Hammerson Plc
Hampshire County Council
Hart District Council
Harvey Smith
Haslams
Head Teacher
Health And Safety Executive
Heather Le Couteur
Heineken (UK) Ltd
Hermes
Hicks Baker Ltd
Highdown Avenue Management Association Limited
Highways England
Historic England
Hives Architects LLP
Hives Planning
Holybrook Parish Council
Home Group
Homes and Communities Agency
Horstonbridge Development Management Ltd
Howard Thomas
I Rivers
Ian Duddle
Ian Howard
Ian Hunt Associates Ltd
Ian Lloyd
Ian Sutherland
Iceni Projects
IKEA Investment Properties Ltd
Imperial Properties (Reading) Ltd
Inchcape Estates Limited
Indigo Planning On behalf of McKay Securities Plc
ING Real Estate Investment Management
Inglewood Court Residents Association
Integrated Youth Development Service
Isabel Burn
J Pritchard
Jacobs Babbit Public Service Division
Jake Geczy
James Harris
James Lloyd
Jane Bickerstaffe

Jane Chesterfield
Jane Evans
Jane Field
Jane Terry
Jean Atkins
Jeanne Harris
Jeff Taylor
Jennie Newnham
Jim Bailey
Jo Unsworth
Joan And Graham Clark
Joanne Hales
Jodie Brown
John And Meg Vought
John Berry
John Booth
John Dunningham
John George Ltd
John Heaps
John Kavanagh
John Lewis Partnership
Jonathan And Gemma Matthews
Jonathan Gater
Jonathon Turner
Jones Lang LaSalle
Joseph Baker
Judith Oliver
Julia Cooper
Julia Mountford
K Phillips
Kadambari Michaels
Katherine Slater
Katie Dean
Keen Partnership
Keir Price
Kempton Carr Croft
Ken Macrae
Kennet & Avon Canal Trust
Kenya Hill
Kidmore End Parish Council
Kier Property Developments Limited
Kier Reading LLP
Kieron Gregson
King Sturge
Lafarge Tarmac
Lambert Smith Hampton
Larry Watson
LaSalle Investment Management
Lee And Brian Waite
Legal and General Property
Leone Letchford
Lin Godfrey
Lis Clayton
Lisa Digweed
Liz And Les Killick
Lloyd Pople
Lorna Andrew And Jed Ellerby
Louise Bancroft
Louise Fenner
Louise Turner
Lucie Twivey
Lucy Bureau
Lucy Heath
Lynda Chater
Lynne Jones
M D Howlett Associates Ltd

Mapeley (STEPS) Limited
Margaret and Michael Pocock
Marie-Dominique Meunier
Marine Management Organisation
Mark Drukker
Mark Eveleigh
Mark Leedale Planning
Mark Owen
Mark Schull
Martin & Pole
Martin Bishop
Mary Bartlett
Mary Cook
Mayor of London
Melanie Sutherland
Michael Burgess
Michael Geater
Mike Bottomley
Miss Adrienne Duke
Miss Allison Cardie
Miss Amy Miles
Miss Brigid O'Leary
Miss Charlotte Hopley
Miss Coral Cissewski
Miss Davies
Miss Dawn Halpin
Miss Elaine Cobb
Miss Elaine Robson
Miss Elonwy Rees
Miss Emma Perry
Miss Freda Hyatt
Miss Gillian Hopper
Miss Grace Crossley
Miss Helen Gibson
Miss Hilary Morton
Miss Jackie Serjent
Miss Jenna Polak
Miss Joanna Bottiglieri
Miss Karen Reeves
Miss L V Jones
Miss Marissa Tsoukas
Miss Melanie Tether
Miss Michelle Sleaford
Miss Nicola Crouch
Miss Nicola Hamblin
Miss Rebecca Mashayekh
Miss Sally Cross
Miss Summreen Sheikh
Miss Susan Curd
Miss Tanya Rosenberg
Morley Fund Management Ltd
Motik Consulting Associates
Mount Properties c/o Investra Capital Ltd
Mr & Mrs Martin and Judith Cullen
Mr & Mrs Sirisena
Mr A.M Hooper
Mr Aaron Collett
Mr Adrian Windisch
Mr Alan Barnes
Mr Alan Hardwick
Mr Alan Overton
Mr Alan Rutter
Mr Allen Sinclair
Mr Alok Sharma MP
Mr Alun Edwards
Mr And Mrs A Murray

Mr And Mrs C Goslar
Mr And Mrs C K Neo
Mr And Mrs C.R. And H.E. Hanshaw
Mr And Mrs Halter
Mr And Mrs Howes
Mr And Mrs J Colbourn
Mr And Mrs M Gulliford
Mr And Mrs Peter & Jennie West
Mr And Mrs R Buzza
Mr And Mrs Stone
Mr And Mrs Taylor
Mr And Mrs W Courtnage
Mr Andrew Black
Mr Andrew Clayfield
Mr Andrew Laylry
Mr Andrew Robertson
Mr Andrew Somerville
Mr Anthony Ford
Mr Aston And Ms Wilshaw
Mr B Garvie
Mr Barras
Mr Barry Blewitt
Mr Bates
Mr Ben Stanesby
Mr Bertram Pepper
Mr Biddle
Mr Brendan Ridge
Mr Brian Oatway
Mr Brian Warren
Mr Browne
Mr Cann
Mr Charlie Clare
Mr Chris Townsend
Mr Chris Webster
Mr Chris Wood
Mr Christopher Head
Mr CJ Harding
Mr Clive Tombs
Mr Colin Hatcher
Mr Colin Lee
Mr Craig Anderson
Mr Craig Round
Mr Craige Burden
Mr D Long
Mr DA Weston
Mr Damian Bell
Mr Darren Lovelock
Mr Darren Mulcahy
Mr Dave Kenny
Mr David Cole
Mr David Earnshaw
Mr David Farrell
Mr David Harris
Mr David Patterson
Mr David Scull
Mr David Warren
Mr Dean Ellis
Mr Dennis Hadley
Mr Dennis Matthews
Mr Derek Bertin
Mr Derek Chapman
Mr Derek North
Mr Duncan Wooldridge
Mr Edward Hammond
Mr Edward Wild
Mr Eric Bolton

Mr FA Bisby
Mr Fred Higgs
Mr Gareth Epps
Mr Garry Foster
Mr Gavin Moyse
Mr Gavin Thurley
Mr Geoff Armstrong
Mr Gordan Ball
Mr Graeme Lang
Mr Graham Jerome
Mr Greg Farrell
Mr Guest
Mr Hora Tefvik
Mr Howlett
Mr Ian Cuthbert
Mr Ian Knock
Mr Ian Mackinder
Mr J Harper
Mr James Cook
Mr James Walsh
Mr Jan Steele
Mr Jason Harper
Mr Jason Pyke
Mr Johann Wain
Mr Johannes Hersbach
Mr John Hall
Mr John Hendy
Mr John Hoggett
Mr John Holland
Mr John J Frake
Mr John McLeod
Mr John Mould
Mr John Mullaney
Mr John Varney
Mr John Wilkins
Mr Jonathan Green
Mr Jonathan Sutton
Mr Joseph Provino
Mr Keith Downer
Mr Keith Weaver
Mr Kevin Griffiths
Mr Leslie Chubb
Mr Leszek Luszowicz
Mr Logan Morris
Mr Lorcan Mullally
Mr Lumbroso
Mr Lyttle
Mr M Barrett
Mr M Zamir
Mr Magnus Smyly
Mr Mark Ashfield
Mr Mark McGovern
Mr Mark Pargeter
Mr Mark Roach
Mr Mark Utting
Mr Mark Young
Mr Martin Brommell
Mr Martin Champion
Mr Martin Mikhail
Mr Martin Wagner
Mr Martyn Jones
Mr Matt Shaw
Mr Michael Cragg
Mr Michael Thomas
Mr Michael Wellock
Mr Mike Atkinson

Mr Napier Munro-Faure
Mr Nick Campolucci
Mr Nick Clark
Mr Nick Stone
Mr Nigel Armstead
Mr Nigel Haines
Mr Oliver Jenks
Mr Omkar Adhikari
Mr Parmod Sharma
Mr Paul Elford
Mr Paul Harrison
Mr Paul Higginbotham
Mr Paul Morris
Mr Paul Raynsford
Mr Paul Rylands
Mr Paul Turnock
Mr Peter Baker
Mr Peter Hallbery
Mr Peter Hempstead
Mr Peter Moran
Mr Peter Potter
Mr Peter Weaver
Mr Peter Wood
Mr Peter Woodbridge
Mr Phillip Gill
Mr Piers Caswell
Mr R V Smith
Mr R W Embling
Mr Rab Lee
Mr Richard Fenn
Mr Richard Kenwood
Mr Richard Mallett
Mr Richard Riley
Mr Robert Constance
Mr Robert O'Neill
Mr Robert Wilson MP
Mr Roger N Walton
Mr Ronald Cutting
Mr Ross
Mr Ross Thomson
Mr S Kendrick
Mr Sankar Basu
Mr Scott Calder
Mr Shahid Rafiq
Mr Simon Ede
Mr Simon Riley
Mr Stephen Biddle
Mr Stephen Young
Mr Steve Hicks
Mr Steve Higgs
Mr Steve Luckcock
Mr Stuart Gould
Mr Sunil Fernandes
Mr Surinder Puri
Mr T Gutteridge
Mr Terry Alway
Mr Terry Mills
Mr Thomas Sinclair
Mr Tim Byrne
Mr Tim Humphries
Mr Tim Pendrill
Mr Tom Howell
Mr Tom Robinson
Mr Tom Winchester
Mr Tony Martin
Mr Trevor Keable

Mr Trevor Thomas
Mr Victor Koroma
Mr W S G Macphee
Mr Wilkins
Mr William Pocock
Mr Winter
Mrs Ann Briers
Mrs Ann Davis
Mrs Ann Rance
Mrs Anna Ellis
Mrs Annie Bass
Mrs Carol Froud
Mrs Caroline Stewart
Mrs Carolyn Ribbons
Mrs Cathy Snarey
Mrs Christine Cliburn
Mrs Christine Cuthbertson
Mrs Christine Northway
Mrs Claire Gulliver
Mrs Clotilda Rahman
Mrs Deirdre Wells
Mrs Dorothy Gibert
Mrs E R Smeeth
Mrs Eileen Uden
Mrs Elaine McDonald
Mrs Elaine Warwick
Mrs Elizabeth Blair
Mrs Elizabeth Parsons
Mrs Emma Card
Mrs F Hyman
Mrs Francis Mitchell
Mrs G Irvine
Mrs Gillian Wilson
Mrs Hazel Andrew
Mrs Hazel Matthews
Mrs Heidi Anderson
Mrs Ida McVetis
Mrs Jan Temperley
Mrs Jane Jarvis
Mrs Janet Gray
Mrs Janette Sassoon
Mrs Jenny Cottee
Mrs Jenny Hicks
Mrs Jill Hodges
Mrs Julie Gould
Mrs June Hardcastle
Mrs Karen Close
Mrs Kelly Tatam
Mrs Laura Roses
Mrs Linda McCauley
Mrs Lis Howlett
Mrs Lyn Chandler
Mrs Lynda Martin
Mrs Lynn Eggleton
Mrs Margaret Horne
Mrs Margaret McDermott
Mrs Mary Waite
Mrs Melanie Minty
Mrs Norma Sinclair
Mrs Pamela Webb
Mrs Patricia Woodcock
Mrs R Mansor
Mrs Rachel Ruchpaul
Mrs Robson
Mrs Rosemary Porter
Mrs S Elston

Mrs Sadie Cooke
Mrs Sandie Rimmer
Mrs Sarah Coelho
Mrs Sheila Lines
Mrs Sheila Smith
Mrs Shelagh Stiles
Mrs Susan Baker
Mrs Susan Johnston
Mrs Tanya Rae
Mrs Theresa Robinson
Mrs Tina Barnes
Mrs Tracey Dunk
Mrs V Munro
Mrs Violet Hurn
Mrs Virginia Day
Mrs Zoe Page-Smith
Ms Amanda Day
Ms Baldock
Ms Beth Scott
Ms Caroline Ancombe
Ms Cath Moffat
Ms Catherine Hutchison
Ms Cathy Frost
Ms CP Lim
Ms Dawn Whipp
Ms Dean
Ms Doris Carter
Ms Fiona Loughlin
Ms Helen Lambert
Ms Hitchcock And Mr Watts
Ms Isla Geddes
Ms Isobel Ballsdon
Ms J Heward
Ms J Manning Brown
Ms Janet Sherbourne
Ms JM Langford
Ms Joanna Stewart
Ms Karen Rumbol
Ms Karin Herbst
Ms Liz Ellis
Ms Lynne Lemon
Ms Marie Percival
Ms Nicky Simpson
Ms Nicola Suter
Ms Ruth Perkins
Ms S Sheikh
Ms Sarah Gee
Ms Sarah Waite
Ms Sharon Kiely
Ms Shelagh Howard
Ms Sonia Law
Ms Stella Clark
Ms Susan Grover
Ms Taplin
Ms Veronica Chapman
Ms Vickie Abel
Ms Zeba Rao
Museums, Archives And Libraries
Nancy Jarakana
Natalie Pryor
Nathaniel Lichfield And Partners
National Grid
National Offender Management Service/HM Prisons
Natural England
Network Rail
Neville Turner
Nexus Planning
NHS North and West Reading Clinical Comm Group
NHS Property Services
NHS South Reading Clinical Commissioning Group
Nicola Gooch
Nigel And Helen Dodd
Norman Bullock
North Whitley Tenant Team Chair
Northcourt Avenue Residents Association
O2
Oak Leaf Surveyors
Oakleaf Building Surveyors Ltd
Office For Nuclear Regulation
Office of Rail Regulation
Old Mutual Property Fund
Open Spaces Society
Orla McBride
Outdoor Media Centre
Owner/Occupier
Owners Of 350 Basingstoke Road
Oxford City Council
Oxford Properties
Oxford Rd South Neighbourhood Watch Committee
Oxfordshire County Council
P J Planning
Pam Reynolds
Pangbourne Beaver Investments
Parkinson Holt LLP
Parks Operational Level 1
Patricia Appleton
Paul Letchford
Paul Myerscough
PCSO Marion Ryall
Peacock & Smith
Pegasus Planning Group
Peter and Linda Smith
Peter Andrews
Peter Brett Associates
Peter J Vallance
Pioneer Property Services
Pip Waite
Pitmans
Plan Ahead Drawing Services
Planning Potential Ltd.
Professor Nigel Bell
Professor Paul Bardos
Prospect Estate Agents
Provision Planning
Prudential Plc
Prudential Portfolio Investment Managers
Public Health Consultant
Purley On Thames Parish Council
Quod
Radian
Raglan Housing Association
Rapleys
Reading Abbey Quarter Project Team
Reading And Mid Berkshire CAMRA
Reading Borough Council
Reading Chronicle Environment Correspondent
Reading Civic Society
Reading Climate Change Partnership
Reading Conservative Group
Reading CTC District Association
Reading Cycle Campaign
Reading Football Club

Reading Friends Of The Earth
Reading Golf Club Ltd
Reading Gospel Hall Trust
Reading Muslim Council
Reading Transport Ltd
Reading UK CIC
Reading Urban Wildlife Group
Reading Voluntary Action
Reading Youth Cabinet
Red Kite Development Consultancy
Redlands And University Neighbourhood NAG
Redlands GLOBE
RenewableUK
Rentplus
Reverend Keith Knee-Robinson
Reverend Vernon Orr
Richard Fenn Designs Limited
Richard Maung
Richard Pearson
Ridge And Partners
Robert Dimmick
Robert Markus Gyselynck & Mya Davis
Robert Rigby Architects
Robert Sherwood
Robert Turley Associates
Roger Ebbett
Romans
Ropemaker Properties
Ross Brereton
Rowberry Morris
Royal Berkshire Fire And Rescue Service
Royal Borough Of Windsor And Maidenhead
Royal Mail Group
RPS Planning
Rushmoor Borough Council
Russell Crow
Ruth Shaffrey
S E Tucker And J Calcutt
S J Walton
Sackville Developments (Reading) Ltd
Sally Archer
Sally Beales
Sally Roark
Sara Batting Estate Agents
Sara Kopp
Sarah Hayter
Sarah Judge
Sarah McCullough
Savills
Scott Brownrigg
Scott Versace
Sehmi Builders Merchants
Setsquare Solutions
Sharps Commercial
Sheila Harris
Sheilah Higginson
Sheppard Robson
Shinfield Mothers Union
Shinfield Parish Council
Shirwell Ltd
Shurgard Self-Storage
Simona Kermavnar
Skandia Property Fund
Slough Borough Council
Sonic Star Properties Ltd
Sonning Parish Council
South Bucks District Council
South Oxfordshire District Council
Southern Housing Group
Spen Hill Developments
Sport England
SSA Planning Limited
SSE Power Distribution
St James Group Ltd
Standard Life Investments
Stephanie O'Callaghan
Stephen Bowley Planning Consultancy
Steve Ayers
Steve Waite
Stewart Ross Associates
Stuart Norris
Sue Ronay
Sun Street Y&C Centre
Surrey County Council
Surrey Heath Borough Council
Susan Knight
Susan Spires
SusTrans
Swindon Borough Council
TA Fisher & Sons
Tanja Rebel
Tarmac
Taylor Wimpey West London
Tennant Support
Tennant Support Ground Floor
Test Valley Borough Council
Tetlow King Planning
Tew Design and Management
Thames Properties
Thames Valley Berkshire LEP
Thames Valley Chamber Of Commerce
Thames Valley Police - Crime Prevention Team
Thames Valley University
Thames Water
The Butler Partnership
The Canal & River Trust
The Coal Authority
The Council Of British Archaeology
The Englefield Estate
The Gardens Trust
The JTS Partnership LLP
The Keen Partnership
The Launchbury family
The Laurel Dawn Property Trading Partnership
The National Federation Of Gypsy Liaison Groups
The Ramblers Association - Berkshire Area
The Royal Society For The Protection Of Birds
The Theatres Trust
The Warren & District Residents Association
Tilehurst Allotments Society
Tilehurst Horticultural Association
Tilehurst Parish Council
Tilehurst Poor's Land Charity
Tim Cook
Tina Allen
T-Mobile
Tony Cowling
Tracey Essery
Transport 2000
Trustees of the Phillimore Successors Settlement
TRW Pensions Trust Ltd
Turley Associates

UBS Global Asset Management (UK) Ltd
Universities Superannuation Scheme Limited
University of Reading
Vail Williams LLP
Vale of White Horse District Council
Viridis Real Estate
Vodafone
Voluntary Sector Support
Walsingham Planning
West Berkshire Council
Westbuild Homes Limited
William Comery
Willowside Homes
Wiltshire Council
Wm Morrison Supermarkets Plc
Wokingham Borough Council
Women's Learning Centre
Woodley Town Council
Woolf Bond Planning LLP
Worton Grange Industrial Limited
Wycombe District Council

APPENDIX 2: CONSULTATION EMAIL TEXT

Reading Borough Local Plan - chance to comment on Draft Local Plan

Reading Borough Council is now consulting on the Draft Local Plan until 14th June 2017.

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

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

We welcome any comments that you have. Please provide written responses to the consultation by 5 p.m. on 14th June 2017. Responses should be sent to: planningpolicy@reading.gov.uk or Planning Policy Team, Reading Borough Council, Civic Offices, Bridge Street, RG1 2LU.

You may also wish attend one of our drop-in events to talk about the Local Plan to a planning officer in more detail. There is no need to let us know if you wish to attend beforehand. These will be held at the Civic Offices, Bridge Street, RG1 2LU in main reception on Monday 15th May from 2:00 to 7:00 p.m. and Tuesday 23rd May from 1:00 to 6:00 p.m.

The next stage is that we intend to publish a revised draft plan, taking your responses to this consultation into account, in autumn of 2017, and will ask again for your views.

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

APPENDIX 3: SUMMARY LEAFLET

How should Reading develop in the next 20 years?

Reading Borough Local Plan - Consultation on the Draft Local Plan

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

- **Housing need** - 658 homes to be provided in the Borough each year, around 50% in Central Reading, 20% in South Reading and 30% in remaining areas of the Borough;
- **Employment need** - protection of existing employment space and provision of new warehousing and industrial space primarily at Island Rd;
- **Sustainability** - expectation that new development will have high levels of environmental performance;
- **Heritage** - substantially expanded heritage policies outlining a positive strategy for conservation and enhancement of Reading's heritage;
- **Open Spaces** - key open spaces remain subject to strong policy protection, including a new designation for Local Green Space;
- **Major transport projects** - including Mass Rapid Transit, Green Park Station, Reading West Station, Cow Lane Bridges and National Cycle Network Route 422; and
- **Identified sites for development** - as shown on the Draft Proposals Map.



What is the process for adopting the plan?

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

We intend to publish an edited draft plan, taking your responses to this consultation into account, in autumn of 2017 and will ask again for your views. Once we are happy with the draft, it will be submitted to the government and a public examination of the plan will take place. If the plan passes examination, it can be adopted as our official policy.

How to find more information

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

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

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

How to get involved

Written responses: Please provide written responses to the consultation by 5 pm on 14th June 2017. Responses should be sent to:

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

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

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

Monday 15th May from 2:00 to 7:00 pm

Tuesday 23rd May from 1:00 to 6:00 pm



Reading
Borough Council
Working better with you

APPENDIX 4: COUNCIL'S PRESS RELEASE

<http://news.reading.gov.uk/localplanconsultation/>

Help Shape Reading's Future in Key Planning Consultation

April 27, 2017 Oscar Mortali

PUBLIC consultation on a key planning document which will provide a 20-year blueprint for Reading begins on Wednesday 3rd May.

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

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

Following an initial period of public consultation last year in which 200 representations were made, the Council is now asking residents, businesses and organisations to have their say on a draft of the Local Plan as part of a formal six-week consultation.

From May 3rd, the Draft Local Plan will be available on the Council's website at www.reading.gov.uk/newlocalplan and people will be able to feedback via the same link.

Two Local Plan drop-in events, where residents can discuss the plans with planning officers, have also been organised and will be hosted in the reception of the Civic Offices. They will take place on Monday 15th May, from 2pm to 7pm, and Tuesday 23rd May, from 1pm to 6pm.

All responses will be considered before a Revised Draft Local Plan is submitted to the Government.

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

"This is a key consultation, the results of which will help influence and shape Reading over the next 20 years. I would urge people to take some time to have their say.

"The acute need for housing in the south east - and in particular affordable housing - means Reading will continue to face huge pressures in terms of development. The Local Plan will determine what is and isn't acceptable in terms of possible future development.

"Aside from working with neighbouring authorities to accommodate more housing, the document highlights opportunities to make even more of Reading's considerable heritage,

not least the Council's on going work to transform the Abbey Quarter into a major visitor attraction."

National changes in planning policy mean every local authority now needs to replace existing development plans with a single Local Plan that seeks to meet its needs.

Reading's updated Local Plan addresses major issues facing Reading, including housing, affordable housing, infrastructure and transport, employment need, sustainability, heritage and open spaces.

APPENDIX 5: PRESS ARTICLES

<http://www.getreading.co.uk/news/reading-berkshire-news/help-shape-house-building-reading-12953083>

<http://www.getreading.co.uk/news/reading-berkshire-news/reading-draft-plan-650-homes-12865069>

<http://www.getreading.co.uk/news/reading-berkshire-news/changing-face-reading-big-developments-12861869>

<http://www.getreading.co.uk/news/reading-berkshire-news/changing-face-reading-big-developments-12861869>

http://www.readingchronicle.co.uk/news/15258836.Plans_revealed_for_Reading_s_housing_future/

APPENDIX 6: EXHIBITION BOARDS FOR DROP-IN EVENTS

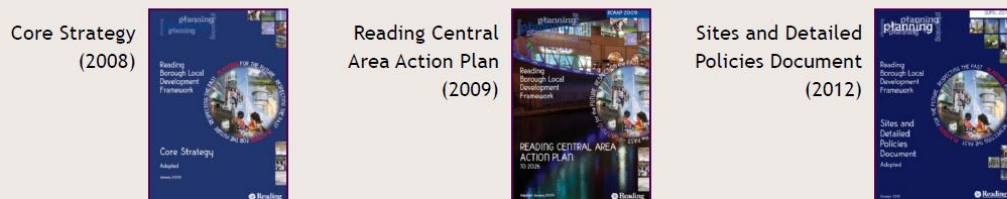


Where we are in the process:



We are at the second stage of the process, a full Draft Local Plan. This has taken account of responses received on Issues and Options last year, as well as evidence, national policy and work with neighbouring authorities. A revised draft will be out for consultation later in the year.

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



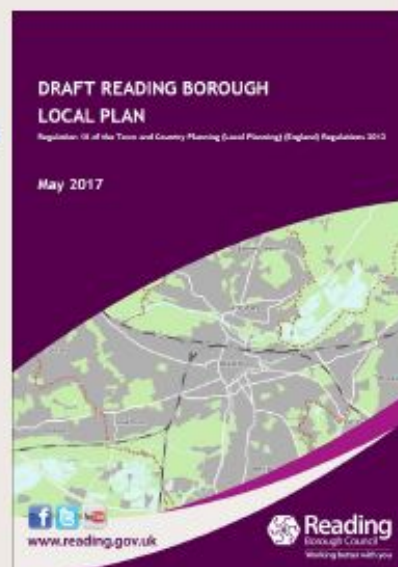
What is this consultation about?

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

This stage is a full draft plan. It includes an overall strategy and levels of development for the Borough up to 2036, proposed sites for development and protection, and detailed policies for dealing with planning applications.

Some of the headlines are:

- Planning for 658 new homes per year;
- New employment floorspace, particularly for industrial and warehousing;
- Sites to deliver the above levels of development;
- Retain the existing approach to a number of matters, including seeking provision of affordable housing;
- A greater focus on heritage;
- Areas of 'Local Green Space' identified; and
- A concentration of much of the development proposed on the centre and south of Reading.



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



We have also taken account of your comments at Issues and Options stage. Those comments, together with a Council response, are summarised on our website.

How can I get involved?

The consultation runs until Wednesday 14th June 2017.

We welcome any comments that you have.

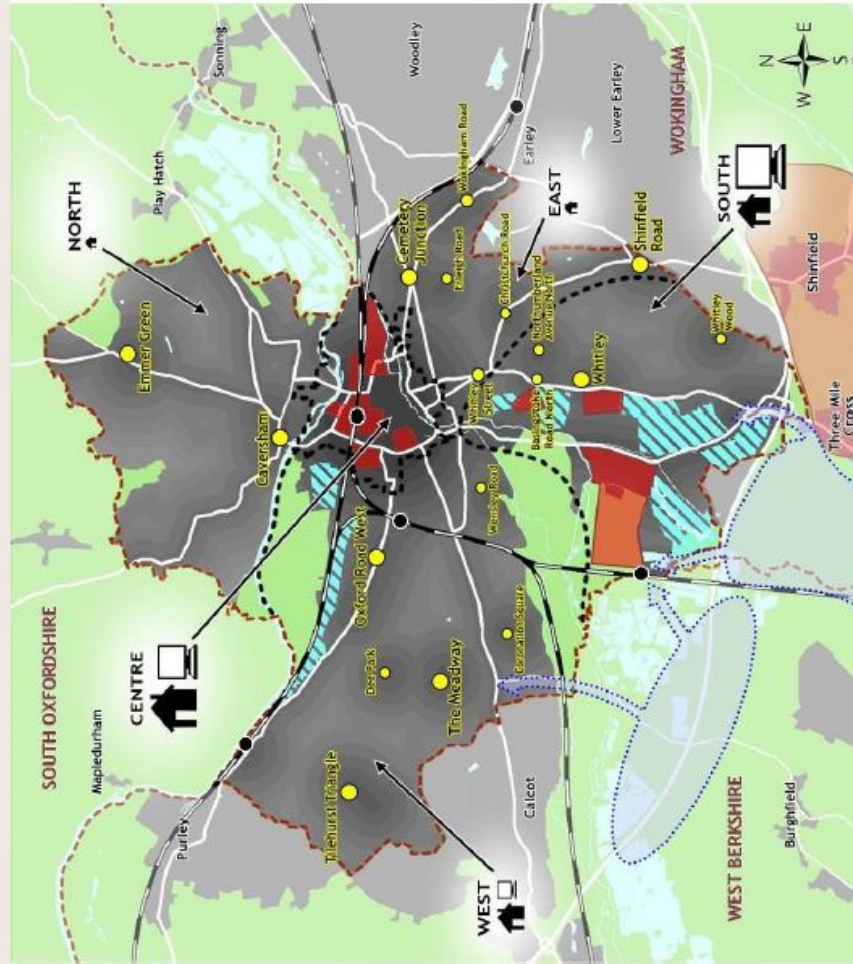
You can comment by writing to us at:

LDF@reading.gov.uk

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

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

Overall Strategy



List of development sites

Site ID	Site Name	SRSF	Location
CR11a	Friar Street and Station Road	SRSF	Land South West of Junction 11 of the M4
CR11b	Greyfriars Road Corner	WR1	Dee Park
CR11c	Station Hill and Friars Walk	WR2	Park Lane Primary School, The Laurels and Downing Road
CR11d	Brunel Arcade and Apex Plaza	WR3a	Former Cox and Wyman Site, Cardiff Road
CR11e	North of Station	WR3b	2 Boss Road and Part of Meadow Road
CR11f	West of Caversham Road	WR3c	28-30 Rishfield Avenue
CR11g	Riverside	WR3d	Rivermead Leisure Centre, Rishfield Avenue
CR11h	Napier Road Corner	WR3e	Yeomanry House, Castle Hill
CR11i	Napier Court	WR3f	4 Berkeley Avenue
CR12a	Cattle Market	WR3g	211-221 Oxford Road, 10 and Rear of 8 Prospect Street
CR12b	Great Knollys Street and Wealdale Street	WR3h	Rear of 303-315 Oxford Road
CR12c	Chatham Street, Eaton Place and Oxford Road	WR3i	Part of Former Battle Hospital, Portman Road
CR12d	Broad Street Mall	WR3j	Land at Mouldford Meadows
CR12e	Hozer Street	WR3k	784-794 Oxford Road
CR13a	Reading Prison	WR3l	816 Oxford Road
CR13b	Forbury Retail Park	WR3m	103 Dee Road
CR13c	Forbury Business Park and Kenaxon Drive	WR3n	Amethyst Lane
CR13d	Gas Holder	WR3o	The Meadow Centre, Honey End Lane
CR14a	Central Swimming Pool, Battle Street	WR3p	Alise Burrows Home, Dwyer Road
CR14b	Former Reading Family Centre, North Street	WR3q	Norcot Community Centre, Lyndhurst Road
CR14c	17-23 Queen Victoria Street	WR3r	Charters Car Sales, Oxford Road
CR14d	173-175 Friar Street and 27-32 Market Place	WR3s	Land at Kentwood Hill
CR14e	3-10 Market Place, Abbey Hall and Abbey Square	WR3t	Land at Armour Hill
CR14f	1-5 King Street	CA1a	Reading University Boat Club, Thames Promenade
CR14g	The Oracle Extension, Bridge St and Letcombe St	CA1b	Part of Reading Golf Course, Kidmore End Road
CR14h	Central Club, London Street	CA1c	Land at Lowfield Road
CR14i	Enterprise House, 89-97 London Street	CA1d	Rear 200-214 Henley Rd, 12-24 All Hallowes Rd 6, 7, 8 Coppe Ave
CR14j	Corner of Crown Street and Southampton Street	CA1e	Rear of 13-14a Hawthorne Rd B 282-292, Henley Rd
CR14k	Corner of Crown Street and Silver Street	CA1f	Rear of 1-3 Woodcote Road and 21 St Peter's Hill
CR14l	107-109 Kings Road	CA1g	Land West of Henley Road Cemetery
CR14m	Caversham Look Island, Thames Side	CA2	Caversham Park
CR15	The Reading Abbey Quarter	ER1a	The Woodley Arms PH, Walsdeok Street
SR2a	Former Landfill, Island Road	ER1b	Dingley House, 3-5 Craven Road
SR2b	North of Island Road	ER1c	Land Rear of 8-26 Redlands Road
SR2c	Island Road A33 Frontage	ER1d	Land Adjacent to 40 Redlands Road
SR3	Land North of Manor Farm Road	ER1e	St Patrick's Hall, Northbour Avenue
SR4	South of Elgar Road	ER1f	Hamilton Centre, Bulmerize Road
SR5a	Pulleray Park, Rose Kiln Lane	ER1g	Alexander House, Kings Road
SR5b	Rear of 3-29 Newcaste Road	ER1h	Arthur Hill Swimming Pool, 221-225 Kings Road
SR5c	169-173 Basingstoke Road	ER1i	261-275 London Road
SR5d	16-18 Bennet Road	ER1j	Palmer Park Car Park
SR5e	Park of Former Berkshire Brewery Site	ER1k	131 Wokingham Road

KEY

- Scale of residential development (indicated by size of icon)
- Scale of employment development (indicated by size of icon)
- Major opportunity area
- Identified major development location in adjoining plan
- Potential adjoining major development (not currently identified in plan) and link into Reading
- Major existing employment area
- District centre
- Local centre
- Indicative overall density/intensity of development—LOWEST
- Indicative overall density/intensity of development—HIGHEST
- Local authority boundary
- Area of Reading (sections 5 to 9)
- Railway and station
- Water
- Undeveloped land
- Built up area and road

APPENDIX 7: SUMMARY OF WRITTEN RESPONSES

The following pages list and summarise each representation made. Please note that these responses have been summarised for ease of reference, and that they are not necessarily reproduced here verbatim. In some cases, a significant amount of text is absent from the summary. It is important to note that, in taking the response into account and considering how it should inform the plan, officers will refer to the full representation, not the summary.

RESPONDENT	SECTION OF DOCUMENT	SUMMARY OF RESPONSE	READING BOROUGH COUNCIL OFFICER RESPONSE
Aviva Life and Pensions UK Ltd	General comments	We fully support the objective and principle of putting in place an updated Local Plan that will help to continue to bring about positive change in the borough. The Local Plan, once adopted, should present an integrated vision but based on individual land owners and developers bringing forward their own sites for development on different timescales, when appropriate.	Noted. No change needed.
Basingstoke and Deane Borough Council	General comments	The BDBC Local Plan (2011-29) makes provision for the Council's full housing requirement. The Council therefore considers that there is no unmet housing need arising from Basingstoke and Deane borough.	Noted. No change needed.
Bracknell Forest Borough Council	General comments	Bracknell Forest Council is pleased to see that most of the comments provided on the skeleton draft of the proposed Local Plan have been taken into account.	Noted. No change needed.
Bracknell Forest Borough Council	General comments	Ongoing co-operation between this Authority and Reading Borough Council should include the topic areas of employment, housing (including gypsies and travellers), transport and health.	Noted. No change needed. The Council will continue to co-operate with BFBC on these matters.
Buckinghamshire County Council	General comments	BCC has no comments to make on the draft Reading Borough Local Plan at this stage.	Noted. No change needed.
Canal & River Trust	General comments	Please note that all references to 'Kennet and Avon canal' in the local plan document should be changed and the word 'and' replaced by an ampersand to correctly reflect the name of the waterway.	Agreed. Change proposed. The references should be amended.
Canal & River Trust	General comments	The canal contributes towards the provision of significant local and strategic multi-functional Green Infrastructure and it is important to recognise the multi-functionality of inland waterways as providing more than purely open space and wildlife habitats. We would draw your attention to the TCPA Policy Advice Note written in conjunction with British Waterways. The document promotes the contribution that inland waterways make to economic, social and environmental agendas and demonstrates how inland waterways contribute to the Government's key policy objectives. It also highlight the public benefits generated by waterways so that they are fully appreciated by policy-makers and influencers, and by planners at all the different spatial levels.	Noted. No change proposed. It is considered that the importance of waterways as a multi-functional resource throughout the document.
Cantay House Partnership	General comments	Reading appears to have embraced national Government Advice to ensure that Local Plans are put into place as quickly as possible in order to facilitate much needed strategically planned growth. In this regard, Reading's commitment to progressing their Local plan is supported.	Noted. No change needed.
TJ Cook	General comments	Why isn't recreation/entertainment in its own section and more extensive work as putting it into retail is not sufficient or accurate plan. Recreation in the town should be a significant part in its own right. Reading has always been place to work not live. This due to low investment in quality recreation and entertainment in the town.	No change proposed. Recreation and entertainment/leisure is covered in the document, but does not need to be a section in its own right.
TJ Cook	General comments	I am concerned about Reading Weekly Market and ask that reduction in fees or allowing some deal to traders to show their wares; otherwise, it will cease to exist in the future. Some marketing or strategy needs to be in place to maintain and again allow it to flourish.	No change proposed. Management of the market is not a matter for the Local Plan.
TJ Cook	General comments	There needs to be a discussion on improving the air quality in the town. A possible suggestion is	No change proposed. Air quality is

		trying to see if there is a way of reducing lorries onto Reading's major roads at peak times thus reducing diesel concentration when most people commuting in the town, a danger to their health.	dealt with in various parts of the document, including a specific policy and a requirement for electric vehicle charging. Not all parts of a response to air quality issues can be covered by the Local Plan.
TJ Cook	General comments	<p>The whole model of the email and the draft document is a very, very poor presentation. In that, email couldn't get links in line but skewed over the email. The content is more interested in getting glossary items explained rather than conveying content. I believe sections of the draft plans should be reviewed for content to allow more people to participate rather than technical jargon. This should have then published in stages and then incorporated into the one document at the end to review to allow a wider audience to join in with this consultation. This is the second time, I have complained at not putting things in plain English in a consultation for residents of the borough.</p> <p>To me, the whole strategy of the council or the department who do planning and transport has been mediocre at best with no real improvement and looking for all parties to consider what changes need to be done to get Reading as a thriving town for all in Reading. There have been major projects has been implemented, but I can't think of anything inventive or new in the town for a while.</p> <p>I believe it is time for the audit commission to look at reviewing Reading performance and consider recommendations of how we can move forward from this stagnant state of affairs in the borough. I think we need ideas and possibly a new strategy for Reading</p>	No change needed. This is not agreed.
Emmer Green Residents Association	General comments	Whilst the reactions of residents will generally be on matters of concern to them, and may therefore be critical of aspects of the Plan, it should be acknowledged that much thoughtful work has been put into this exercise, it contains a great deal of relevant information, and the commitment to the processes of consultation is appreciated.	Noted. No change needed.
Gladman Developments Ltd	General comments	Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the PPG it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Reading Borough Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside any existing joint working arrangements, to satisfactorily address cross boundary strategic issues and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation on a range of inter-related planning issues, such as the need for effective infrastructure planning. This is required in order to ensure a comprehensive approach to infrastructure provision is being taken across an urban area that crosses administrative boundaries, for example in order to ensure that sufficient school places can be made available to support growth.	Noted. No change proposed. The Council has prepared the Local Plan in compliance with the duty to co-operate, and a full Duty to Co-operate Statement will be prepared that details the measures undertaken.

Green Park Reading No. 1 LLP	General comments	Having reviewed the draft Local Plan, GPR is generally supportive of the Council's wider strategic policies (especially in relation to the promotion of sustainable development).	Noted. No change needed.
Chris Hillcoat	General comments	As a local resident it is great to see the huge strides in development, culture and economy which Reading has taken in the last 20 years, and I commend your success, and your desire for it to continue into the future.	Noted. No change needed.
Historic England	General comments	<p>We consider that the positive strategy for the conservation and enjoyment of, and the clear strategy for enhancing, the historic environment required by the NPPF 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.</p> <p>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. 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.</p>	Noted. It is considered that in general the Local Plan achieves the positive strategy for the conservation and enjoyment of the historic environment.
Mapeley Estates Limited	General comments	We are supportive of the Council's overall approach, their proposals for the West Side Major Opportunity Area and site CR12(c) in particular.	Noted. No change needed.
Marine Management Organisation	General comments	Remit does not include Reading due to lack of coastline and/or tidal river(s)	Noted. No change needed.
Adam Masters	General comment	<p>No new major developments should be planned or allowed to go ahead. The infrastructure cannot cope with the increase in population and needs to be increased and fully in place with extra capacity to handle emergencies etc, before any new developments are planned.</p> <p>The infrastructure is actually decreasing at present, with reduction in GP surgeries, nearby schools (potential), children centre services, amenities and leisure (converted to housing). There is no room for the Hospital to expand and it is already running at over capacity, and would not cope in a large emergency situation, putting lives at risk. The roads and emissions levels cannot cope with any increase in population. There are not enough Social Workers, Police, Fire, Doctors etc to handle an increase in population.</p> <p>Adding more houses adds to the problem, as it does not incentivise the public to reduce the population.</p>	No change proposed. The Local Plan needs to be in conformity with national policy, and needs to address the significant shortage of housing locally. Planning for no major new development is not a sustainable approach.
McKay Securities	General comments	Throughout the policy document, the links between area specific policies and general policies	No change needed. It is considered

PLC		should be made clearer and more straightforward.	that these links are in general clear, and if this is not the case, specific instances are needed.
Natural England	General comments	In our review of Reading Borough Local Plan we note the commitment to conserving biodiversity and providing connected habitat for species' adaptation to climate change. While there is some development on greenfield land we accept that mitigation has the potential to provide a biodiversity net gain if implemented properly at the development stage.	Noted. No change needed.
Natural England	General comments	<p>The terms open space, green space and outdoor space seem to be used interchangeably and indiscriminately. I would suggest doing a 'find and replace all' with green space. However that may not be your intention. In which case I suggest providing a definition in your glossary and the doing a 'find and replace' checking the appropriateness of each instance.</p> <p>It's important to point out that open space includes green elements or you are likely to end up with large grey paved areas (like the front of the train station).</p> <ul style="list-style-type: none"> - Outdoor space- and area outside of a building that includes green infrastructure wherever possible. This space includes court yards, balconies, clothes drying areas, etc. - Open space -space primarily designed for people but will include green space and green infrastructure wherever possible - Green space - areas provided for the benefit of wildlife and the enjoyment of people. They contain wild unmanaged areas specifically for wildlife and more formal areas managed for people. - Public Green space- is this any different to green space? - Green infrastructure - habitat for fauna and flora including trees, gardens, hedges, ponds, window boxes, road verges, bird and bat boxes, and green walls and roofs to name a few. 	Partially agreed. Change proposed. It is agreed that there are areas of the plan where the wording can be clarified. However, in most cases the context makes clear what is meant. In general, references to 'open space' in Reading are also likely to include small areas with significant amounts of hard landscaping within the centre, and, with around half of all new housing to be located in the centre, this will need to continue to be the case.
Office of Nuclear Regulation	General comments	Other than comments on Grazeley, we have no adverse comments on the Draft Local Plan.	Noted. No change needed.
Bob O'Neill	General comments	This plan seems to have been written in much clearer English and more understandable reasoning than the previous one was. You do seem to be more open about reasons for each proposal. Credit to its authors.	Noted. No change needed.
Bob O'Neill	General comments	I think you should encourage more sites like the Oxford Road Tesco (Battle Hospital site) where retail and residential are built one on top of the other. This makes more use of the land and cuts down journeys to shop.	No change needed. A number of sites, particularly in the town centre, are identified for such developments.
Bob O'Neill	General comments	Retail expansion is not the most essential need. Reading should think first of its own residents	No change proposed. Reading is

		rather than feeding the interests of the wider area. Perhaps too many supermarkets and too much choice - if something has to be compromised, I would suggest that. Employment and manufacturing was the formula for making Reading prosperous in the past..... Who now gets the jewels for that? Probably Wokingham and not Reading.	planning for retail growth in line with the needs of its existing catchment.
Oxfordshire County Council	General comments	Oxfordshire County Council will work with Reading BC and other partners to assess the transport impacts of Reading's growth on the highway network within South Oxfordshire and to identify appropriate mitigating measures which can be fully funded, including future maintenance costs.	Noted. No change needed.
Oxfordshire County Council	General comments	The Council will also continue to engage with Reading BC on the implications of planned growth in both Reading and Oxfordshire for Education provision, including the cross-boundary movement of pupils into Oxfordshire schools.	Noted. No change needed.
Reading UK CIC	General comments	We welcome the review of the local plan, the headline options of which are described clearly on the summary document as covering housing need, employment need, sustainability, heritage, open spaces major transport projects and the identification of new sites. The Plan overall fits well with our vision and aspirations for Reading as set out in two key documents developed by Reading UK CIC, notably the short term economic development plan for Reading 2016-2020; "Growing Opportunities" and the longer term 'Vision for Reading in 2050'.	Noted. No change needed.
Reading Urban Wildlife Group	General comments	We are broadly supportive of the local plan and greatly appreciate the identification of green corridors to enable wildlife movement across the town, and the requirement of new building to be zero carbon, reducing water consumption and limiting water run-off. We are not convinced that there can be this level of development without adverse impacts on air pollution, biodiversity and flood risk.	Noted. No change needed. It is considered that this level of development can be accommodated whilst balancing air quality, biodiversity and flood risk.
Royal Mail	General comments	Any increase in the number of dwellings and businesses is likely to have an impact on the capacity of Royal Mail's operations and its ability to provide universal postal services across Reading. The expected growth may have capacity implications for existing delivery offices. As a consequence Royal Mail, as a statutory provider, may seek the expansion of existing assets or sites for new delivery offices, particularly where housing developments are concentrated and where existing delivery offices are nearing capacity. A rule of thumb is that for every 400 new dwellings, one additional postal worker is required, and for developments approaching 1,000 new dwellings in one area, an increased footprint or new delivery office may be required. It is imperative that this is kept in mind throughout the stages of the Reading Local Plan, particularly in the context of Royal Mail's statutory duty to provide efficient mail sorting and delivery for the Council's administrative area. Royal Mail must therefore continue to be informed about proposals for strategic locations, planned expansions and growth areas, and would welcome further engagement with the Council to ensure appropriate business development and planning and to safeguard future operations in the Borough.	Agreed. Change proposed. The Infrastructure Delivery Plan should be amended to reflect the need to be aware of this.
Rushmoor Borough Council	General comments	Rushmoor Borough Council supports the overall strategic approach to development as set out in the Draft Local Plan. However, at this stage Rushmoor Borough Council does not wish to make any specific comments on the content of the Local Plan.	Noted. No change needed.

Surrey County Council	General comments	We have no comments.	Noted. No change needed.
Surrey Heath Borough Council	General comments	We have now had the opportunity to consider the Draft Local Plan and have no comments to make at this time.	Noted. No change needed.
Thames Valley Berkshire LEP	General comments	The LEP supports the proposed options.	Noted. No change needed.
Thames Valley Berkshire LEP	General comments	One of the six main objectives of the SEP is to: "Ensure that economic potential is not restricted by labour supply issues". The main issues engaged by the Local Plan are Housing, Employment Land and Transport.	Noted. No change needed.
Thames Valley Police	General comments	I have no comments relating the New Local Plan (Draft) itself, and I welcome its positive stance with regard to the role of policing and safety and security.	Noted. No change needed.
Thames Water	General comments	A key sustainability objective for the preparation of the Local Plan should be for new development to be co-ordinated with the infrastructure it requires to serve it and to take into account the capacity of existing infrastructure. See paragraph 156 and 162 of the NPPF and National Planning Practice Guidance (NPPG) on 'water supply, wastewater and water quality' (Paragraph: 001, Reference ID: 34-001-20140306).	No change needed. This objective is achieved through policy CC9 in the Local Plan.
Transport for London	General comments	Crossrail services (but not Crossrail Ltd or the Crossrail project/scheme) are now referred to as the Elizabeth Line and this wording should be reflected in the Local Plan e.g. in 1.26, 3.2.2, 4.5.10, 5.4.2. The Elizabeth Line could also be added to the glossary	Agreed. Change proposed. The relevant references should be updated.
Tilehurst Poor's Land Charity	General comments	At this stage, we do not comment on the detailed development management policy criteria (including affordable housing provision) but our client reserves their position to do so within subsequent iterations of the emerging development plan as their initial proposals for the site evolve.	Noted. No change needed.
University of Reading	General comments	The University would reiterate the points made in the consultation response to Issues and Options, in particular, the need for the Council to positively prepare the Local Plan (NPPF, paragraph 182) and provide housing land, wherever possible, to meet its OAHN in full, in accordance with the requirements of the NPPF at paragraph 47.	Noted. No change needed.
West Berkshire District Council	General comments	Please note that within the draft Reading Local Plan, where West Berkshire is referred to as 'West Berkshire Council', it should be referred to as 'West Berkshire District Council'.	Agreed. Change proposed. All references should be amended.
John Wilkins	General comments	A major opportunity was missed some years ago when the boundaries of the unitary authorities were established. There is a logical boundary to the Reading conurbation which includes areas currently in Wokingham and West Berks. I hope that RBC, despite possible political issues, will push for a more logical boundary which would help development of this type of plan.	Noted. No change proposed. This issue is outside the remit of the Local Plan.
Environment Agency	Paragraph 1.2.6	There is mention of the Kennet and Avon Canal here, but the River Thames is equally as important and for the purposes of clarity and accuracy should also be included.	Agreed. Reference should be made to River Thames in this paragraph.
Reading Friends of the Earth	2: Vision and Objectives	Good ideals - we particularly welcome the commitment to public transport, walking and cycling - but the vision does not quantify levels of development and we have concerns about how quality of life and sustainability can in practice be balanced with role as a hub for the growth in population envisaged for the Western Berkshire HMA.	Noted. No change needed. It is agreed that growth in housing, as required under national policy, carries sustainability issues, but the Local Plan

		<p>On a South East England scale the environmental footprint was calculated to be 29 times its land area - so arguably any increase in population will be less sustainable and will add to costs as more food, energy and materials must be sourced from abroad or at least outside the region.</p> <p>A larger residential catchment area for the town centre, much of it outside the Borough, will increase demand for transportation. A larger population will increase demand for food, energy, water and recreational space whilst presumably reducing local agricultural land and greenspace.</p> <p>In particular the practicality of “Generating a large proportion of its own energy from renewables” referenced in the Reading 2050 proposal - if this is taken to mean local generation - has to be questioned even without the projected population growth. Objective 5 - addressing sustainability and climate change - does not repeat this visionary aim for local energy generation.</p>	<p>seeks to ensure that this is sustainable growth. Whilst renewable energy generation is not mentioned in the objectives, it nonetheless forms part of the Plan in the sustainability policies.</p>
Reading UK CIC	2: Vision and Objectives	<p>We welcome the fact that the new Local plan will bring together 3 existing documents. As a densely populated town this allows a more holistic approach to the town’s development. We also support the way in which it builds on and refines the previous plans, and takes account of the changing national and regional policy context, recognising the historic growth of the town with its location criss-crossed by three rivers, but more importantly the rapid growth and development over the past 30 years. This we believe will give clarity and confidence to local business to expand and investor developers to put forward new plans. It will also be easier for cross border discussions and negotiations to take place with neighbouring authorities.</p>	<p>Noted. No change needed.</p>
Reading UK CIC	2: Vision and Objectives	<p>We monitored and contributed to the development of the research work in the SHMA and EDNA, which identify the housing and economic development needs and believe it to be rigorous and a wholly suitable evidence base on which to refine Reading’s local plan both from within but also in the context of neighbouring areas with whom our communities and land-uses are so closely intertwined.</p>	<p>Noted. No change needed.</p>
Reading UK CIC	2: Vision and Objectives	<p>The overall approach we believe is correct to focus on linking economic growth with the provision of adequate amounts of affordable housing with improvements in the quality of life for all in Reading.</p>	<p>Noted. No change needed.</p>
Thames Valley Berkshire LEP	2: Vision and Objectives	<p>The SEP Vision is: “Our infrastructure will match the scale of our ambition and potential. And people will choose Thames Valley Berkshire as the place to live and work”. The LEP therefore supports policies in the Local Plan, which promote quality of life and promote sustainable development.</p>	<p>Noted. No change needed.</p>
Ian Campbell	2.1: Vision	<p>The Vision makes sense but neither the short term vision to 2036, or the longer term unofficial vision to 2050 are built on foundations which will deliver a city region built for the future. Both time frames fail to address the housing deficit, now and in the future with a sustainable answer to this question, ' Where without progressively destroying large areas of open countryside in the rural Home Counties west of London can a new settlement on the scale needed (cp.Milton</p>	<p>No change proposed. As previously stated, the Local Plan can only look within its boundaries. There is clearly no scope to deliver a new settlement within the boundaries of Reading.</p>

		<p>Keynes) over two generations be located?</p> <p>Lack of answer to this question is the key omission. The plan contains no commitment to make good the housing deficit; to make housing affordable again in the only realistically way, by significantly increasing the supply. The house price affordability ratio locally is now about 12 x average salaries. About twenty five years ago it was 2.5/3.0 x average salaries. The new plan commitment to on-going failure is the pivotal failure of this plan.</p>	<p>That does not mean that the Council is not committed to working with its neighbouring authorities to deliver homes that meet the needs of the wider area, which is why joint work has been undertaken on the West of Berkshire Spatial Planning Framework, and the bids in support of a garden village at Grazeley, subject to necessary infrastructure investment. However, trying to fit this within a Borough Local Plan will only reduce delivery in Reading because it will hinder bringing forward realistic policy to deliver homes in the period to 2036.</p>
Environment Agency	2.1: Vision	<p>Generally we support the third sentence in the final paragraph of the Vision on page 12. The term "Waterways" should be replaced by "watercourses" and the rivers' riparian corridors and floodplains should be included. Mention of the rivers with reference to their importance in the heritage of the Borough should also be made.</p>	<p>Partially agreed. Change proposed. The text should refer to watercourses. However, it is important to avoid overly complex wording of the vision, and undeveloped riparian corridors and floodplains are covered by existing wording, as is the heritage significance of rivers.</p>
Historic England	2.1: Vision	<p>We welcome the reference to Reading's extensive heritage importance in the Vision, although we would like to see an explicit commitment to the conservation and enhancement of that heritage, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.</p>	<p>Agreed. Change proposed. This wording should be added.</p>
Natural England	2.1: Vision	<p>Suggested change; "Reading's residents, particularly those most in need, will have access to high quality housing and open green space that meets their requirements and safeguards their quality of life."</p> <p>Quality of life is heavily influenced by access to green space; people who have access to green space are fitter, less anxious/depressed, socially cohesive etc. So the people in deprived areas need it more than anyone.</p>	<p>Partially agreed. Change proposed.</p> <p>It is agreed that this part of the vision can make reference to access to open green space, but it makes more sense to include it within the next sentence.</p>
Reading UK CIC	2.1: Vision	<p>We believe this section should now be updated with the latest version of the 2050 Vision as outlined above and the document enclosed.</p>	<p>Agreed. Change proposed. There should be updated text to reflect the current position of the Reading 2050 vision.</p>
Harvey Smith	2.1: Vision	<p>There is much to commend in the Draft Local Plan. The overall Vision is appropriate for Reading's</p>	<p>Noted. No change required.</p>

		development given the multiple pressures on the community and the administration, and it acknowledges some major constraints such as traffic across the Thames.	
University of Reading	2.1: Vision	The University supports the Council's Vision, principally that: "Reading's residents, particularly those most in need, will have access to high quality housing that meets their requirements and safeguards their quality of life. All residents will have access to adequate services and facilities, particularly through strong district and local centres."	Noted. No change required.
Environment Agency	Paragraphs 2.1.2 and 2.1.3	With regard to the Reading 2050 project, we would support the theme of Reading being "a city of rivers" and that it should be "a city which has rediscovered and embraced its heritage and landscape". These two themes/aspirations should be combined as much of the heritage and landscape of Reading is tied to the rivers and their valleys and floodplains.	Noted. No change required.
Reading UK CIC	Paragraph 2.1.2	We welcome the reference to the 2050 Vision in the Local Plan Draft as a sign of its importance in supporting the future development of the town alongside the statutory process. We will continue to work closely with the Council on the development of the Vision in line with the adopted Local Plan. Through consultation with over 20,000 members of the public and 350 local businesses representatives we have developed three key themes and over 50 new ideas around which to build our plan for the future. These themes are: <ul style="list-style-type: none"> · Reading a green tech city · Reading a city of rivers and parks · Reading a city of festivals and culture 	Noted. No change required.
Ian Campbell	2.2: Objectives	The objectives are silent on its housing ambitions. It seems the Council has no aspirations for using the enormous wealth in the area to make future housing costs affordable once again. This omission stands in stark contrast with recent statements by new mayors in, for example, Manchester. Perhaps in Reading an objective like making housing once again affordable for all local residents is not seen as sufficiently important? Other priorities seem to come higher. This is a rational, but myopic response for rural local councils who fear continuous erosion of their countryside, thinking back to decades of well-intentioned, but misjudged policies leading from Lower Earley, to Shinfield, to Three Mile Cross, to Spencer's Wood, and perhaps onto Grazeley and after that perhaps to other rudimentary new urban extensions to the south and south west of Reading (3.2.12). There is a better solution. Unfortunately Local Plan policies intended to duck hard decisions on future housing will hit precisely those the plan wants to protect. It seems as if few lessons have been learnt in four decades. The housing market is broken. The benefits for local residents and the next generation, of returning the housing market to normality, not seen for three decades are colossal. Policies built on sanity will stop the growing personal housing nightmare for those who live and work in the area now and in the future. Unless	No change proposed. The Council is serious about delivering high levels of quality housing, and improving affordability insofar as is possible. This response considers that the Local Plan ducks the issue, but does not set out what the Local Plan should practically do within the boundaries within which it has jurisdiction to deliver additional homes, over and above what is proposed. The points about the need for leadership in delivering homes over the wider area with a long-term view are valid, and the Council is seeking to do this, but the Local Plan cannot be

		a different approach is adopted in the draft Local Plan the existing local housing shortage will increase as prices continue to escalate. Current trends point to growing problems of homelessness; leading eventually to the return of urban slums as more young people are squeezed out of the private housing market and the public sector is unable to deliver an affordable alternative.	the mechanism that delivers this on its own.
Historic England	2.2: Objectives	We welcome Objective 6 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change required.
Reading Friends of the Earth	2.2: Objectives	It's not clear where climate change mitigation and adaptation are addressed in the Objectives. If Objective 5 is intended to relate primarily to transportation (it mentions 'accessible and sustainable') then Objective 3 (which is discussed in 2.2.3) should mention energy efficiency and energy supply and the intention to make progress towards low-carbon living.	No change required. Objective 5 relates to development rather than transport, and already sets out the objective of mitigating and adapting to climate change.
Reading UK CIC	2.2: Objectives	We support the objectives as being consistent with the ED plan for Reading and the 2050 Vision	Noted. No change required.
Thames Properties Ltd	2.2: Objectives	The objectives set out in the Draft LP are considered broadly acceptable in supporting the overarching Vision.	Noted. No change required.
Thames Properties Ltd	2.2: Objectives	RBC needs to ensure that land which can deliver housing is used efficiently to provide as many new homes as possible. When taking into account the additional demand for affordable housing, the importance of maximising available land for residential development is ever more critical. A shortfall of 943 homes is identified and it is acknowledged within the Plan that there is limited available land within the Borough to accommodate additional housing to meet the identified need which highlights the importance of making effective and efficient use of land. Thames Properties is therefore supportive of Objective 2, but notes that RBC should seek to make more effective use of brownfield sites to meet its own housing need. The Richfield Avenue CEA is one such location which could be used more effectively to accommodate a degree of housing to contribute to meeting Objective 2.	No change proposed. The Council considered the Richfield Avenue through the HELAA process, but this was not considered suitable for reasons set out in that assessment. However, at the same time, the Central Berkshire EDNA identified a strong need for new employment floorspace, and all that reallocation of the CEA would achieve is changing the type of development for which there is an unmet need.
Thames Properties Ltd	2.2: Objectives	Thames Properties is supportive of the need to create sustainable communities with good access to employment and open space for those living in the Borough. The Draft LP acknowledges the potential for flexibility in the Richfield CEA to release some employment land for housing which could potentially create a more inclusive and sustainable community where those who live in the Borough have good access to employment and open space. We consider that the Plan could go further to meet Objective 3 by considering a greater variety of uses within the Richfield CEA. A mixed-use scheme for example, with non-traditional employment uses would be more sympathetic to the new residential areas proposed on the periphery of the CEA and would improve the quality of life for those living and working in this part of Reading.	Change proposed. Ensuring access to employment involves retaining important employment areas where they exist. However, the employment section does recognise the possibility for diversification of employment areas where there is no long-term prospect of continued employment use.
University of Reading	2.2: Objectives	The University supports, in particular, objectives 1, 2, 3 and 5. There are limited opportunities for further residential development within Reading Borough. As such, there is a key requirement, as referred within Objective 2, to make the best use of Reading's limited land, including those	Noted. No change required.

		being promoted on behalf of the University. Given the location of both sites, they would contribute towards fulfilling Objectives 3 and 4 by facilitating growth in highly sustainable locations with excellent sustainable access to services and facilities.	
Viridis Real Estate Services Limited	2.2: Objectives	<p>Viridis welcomes the aim of Objective 2 to make the best use of Reading's limited land to deliver as many new homes as possible during the Plan period. However, the DLP underestimates the development capacity of Reading, particularly central Reading and in doing so conflicts with the requirements of the NPPF to make effective use of brownfield land by optimising the development potential of the sites (paragraphs 17 and 58). On this basis Objective 2 is not positively prepared or consistent with national policy.</p> <p>We would therefore request that the following text be added to Objective 2:</p> <p>"Make the best use of Reading's limited land by optimising the development potential of sites, particularly brownfield land, to ensure that as many new homes as possible are delivered to meet identified needs, particularly needs for affordable housing."</p>	<p>Partly agreed. Change proposed.</p> <p>It is considered that the objective should be tweaked to refer to previously developed land, and also most efficient use of sites. The NPPF does use the term 'optimise', but it is caveated within paragraph 58 by also referring to optimising its ability to accommodate uses including housing, but also green/public space). For this reason, it is considered better to refer to 'most efficient' use in the context of these objectives.</p>
Bellway Homes Ltd	Paragraph 2.2.2	Support is expressed for those parts of the plan, which acknowledge that due to Reading's highly developed area with limited available land resource, the best use of that land will be made to deliver as many new homes as possible to meet identified needs.	Noted. No change required.
Chris Bedford	3: Spatial Strategy	The continued concentration of housing in the town centre as proposed in 3.2.1 carries the risk of excluding from the centre smaller scale and lower rent activities that need to be there, including small offices and fringe shops. Crossrail and expansion of Heathrow with a rail link, if it occurs, are likely to lead to take-up of significant amounts of central housing by those working elsewhere, as is already believed to be happening in Slough. The kinds of imbalance referred to in 4.1.50 and 4.3.6 could result. These risks can be countered by promoting, in addition to the lower density housing proposed in the plan, a new high density development in south Reading to provide an alternative to the town centre in a highly accessible location less attractive to rail commuters. By encouraging a cluster of tall buildings in the Rose Kiln Lane area, the plan could make viable 'air rights' development over existing retail premises and their car parks, and provide a catchment for the coffee shops and other facilities found only in higher density areas. Tall buildings here would not affect townscapes of cultural importance, and would be a landmark in a featureless part of the Kennet Valley.	No change proposed. It is not considered that inclusion of a significant amount of housing within central Reading does not preclude the development of small shops and offices, and a number of allocations in the centre would enable these uses to be delivered together. South Reading is not the appropriate location for tall buildings from an accessibility, landscape or townscape point of view.
TJ Cook	3: Spatial Strategy	I disagree with putting sports centres to be spread over the borough as this increases the budgetary cost. More ways should be looked at getting free public transport for people to get to a more centralised sports centres. Other towns have adopted this method, and the cost of running this sports centres, and the development of "shed sports centres" like Palmer Park and Rivermead are short-sighted at best, and very expensive every few years to upgrade and keep. I also interested to know if there were any consultation or visit to other areas to see how they have run	No change proposed. The Council has carried out a Leisure Review for Reading and associated work. The outcome of this, and the reasons for the options chosen, have been periodically reported to Policy

		<p>their sports facilities.</p> <p>I gather over £3 million pounds have been invested into Rivermead over the last few years and the management company who run it?</p> <p>I would like the draft document of the new sports centre to be published at all sports centres to allow more general debate about it provides a modern sports centre for a major town in England. Reading should be working with all recreational facilities in a set radius to get people feedback of what things they need to allow them to enjoy where they live in the area as a whole.</p>	Committee and are available on the Council's website.
The Englefield Estate	3: Spatial Strategy	<p>We welcome the references to Grazeley that are made in paragraphs 3.1.15 and 3.1.7, as clearly any development of this scale will form a major part of the spatial strategy for the Western Housing Market Area.</p> <p>At present the Plan recognises that strategic growth in this location would significantly impact on Reading Borough in terms of infrastructure. However, the Plan also needs to acknowledge that this location is one of most sustainable for strategic growth because it offers the potential for linking to and delivering improvements to sustainable transport modes (such as the Reading-Basingstoke railway line, Park and Ride facilities at Mere oak, potential Mass Rapid Transit facilities, etc).</p> <p>In terms of the scale of growth identified at Grazeley, the Draft Local Plan notes the potential capacity of 15,000 dwellings as identified by the West of Berkshire Spatial Planning Framework. It will be important to plan flexibly for growth at Grazeley, because the Berkshire SHMA recognised that (a) the housing needs of the Eastern HMA are materially greater than for the Western HMA; and (b) that the Eastern HMA is significantly more constrained. As such, the opportunities for the Eastern HMA to meet its own needs may be more limited and so the authorities in the Western HMA may need to accommodate "overspill" from the Eastern HMA. It will therefore be necessary to plan flexibly for growth at Grazeley and to 'future proof' infrastructure and services so that the scale of growth accommodates the required housing needs.</p>	<p>Partially agreed. Change proposed.</p> <p>The text should acknowledge the potential for promotion of sustainable travel modes.</p> <p>In terms of unmet needs from Eastern Berkshire, there is at present no agreement for Western Berkshire to accommodate any such needs, and nor is there any co-ordinated request from the HMA to do so. As such, Western Berkshire is currently planning for meeting its own needs.</p>
Greater London Authority	3: Spatial Strategy	<p>The Borough sits within the 'Western Wedge' Coordination Corridor extending from west London into the Thames Valley. Policy 2.3 of the London Plan sets out how these corridors can support strategic co-ordination of planning and investment. In the context of Reading's role as a significant economic and business centre, it may be useful to explore relevant economic linkages with London. Given Reading's good access to the transport network, we support the draft Plan's level of ambition in terms of employment including industry/warehousing/freight/logistics. We would welcome a conversation with the Council on collaboration opportunities regarding related wider land use requirements, where mutual benefits can be achieved.</p>	Noted. No change needed.
Oxfordshire	3: Spatial Strategy	Oxfordshire County Council supports the principle of strategic planning to integrate growth and	Noted. No change needed.

County Council		infrastructure.	
Oxfordshire County Council	3: Spatial Strategy	Oxfordshire County Council has no objection in principle to the spatial strategy of the Reading draft plan which focuses the borough's development needs on Central Reading with South Reading as the main location for meeting remaining needs in line with the Spatial Planning Framework. However, a number of the infrastructure proposals put forward to deal with the cumulative impacts of growth raise issues for Oxfordshire.	Noted. No change needed.
Reading Friends of the Earth	3: Spatial Strategy	Reading the whole Plan gives the impression that most of the available space may be used by 2036. The Plan should aim to leave space for future development options after 2036. Demolition and re-development has high environmental impact in terms of resource use and carbon emissions so space should be left to allow for future requirements - which may be related to novel techniques for energy supply or waste management, or to provide services locally that at present are provided elsewhere.	No change needed. There are significant development needs for uses such as housing during the plan period, and national policy is that these needs should be met wherever possible. There is no scope to leave land available for later plan periods.
Reading Friends of the Earth	3: Spatial Strategy	Strategy should aim for declining rate of development rather than a fixed rate up to 2036. Fixed rate implies that either development continues at a similar rate - for which there is no land - or comes to a sudden halt - with bad consequences for businesses and the labour market.	No change proposed. The Housing Trajectory does show a lower rates of delivery later in the plan period, although this is not by design. At this stage the Plan cannot anticipate what happens after 2036.
Reading Friends of the Earth	3: Spatial Strategy	We don't accept that identified 'needs' for housing or employment are accurate or should be met. They were developed without assessment of environmental capacity. The Strategic Housing Market Assessment is based on pre-Brexit trends. Future employment patterns will depend on emerging trends in automation, working from home, and UK competitiveness following Brexit.	No change needed. The NPPF is clear that needs must be defined without consideration of environmental capacity, and that thus must be considered in setting figures in the plan. The Local Plan therefore follows national policy in this regard.
Reading Friends of the Earth	3: Spatial Strategy	Development at Grazeley is a long way from central Reading so should be discounted on transportation grounds - it seems unlikely that a development of 15,000 homes so close to Reading and the M4 would be self-contained in terms of employment or retail - also because it would largely be a green field site and is very close to AWE. With a station at Green Park it could be more difficult to maintain adequate passenger capacity and long-distance rail freight services on the Basingstoke line if an additional station is added at Grazeley.	No change proposed. The Council supports the Grazeley proposal subject to provision of the necessary infrastructure - however, it is not a proposal of this Local Plan. The reasoning for the location is set out elsewhere.
Reading Friends of the Earth	3: Spatial Strategy	The proposed area between Pingewood and Burghfield is unsuitable. It is largely green field or reclaimed gravel pits and is close to AWE and the M4 and far from central Reading. As 3.1.6 says there are also flood risk constraints.	No change needed. This section reflects what is set out in the published West of Berkshire Spatial Planning Framework. This will need to be considered within the relevant local plans.

Reading UK CIC	3: Spatial Strategy	<p>We accept the constraints the Reading local government boundaries puts on future growth. However reference to the true nature of the travel to work area, economic reach and housing markets that stretch beyond the local authority boundary, is important. It is also important to highlight opportunities for the future in respect of;</p> <ul style="list-style-type: none"> · land just over the boundaries that can be negotiated for with neighbouring local authorities - especially for housing under the duty to cooperate. · land, especially around south and south west Reading, that is susceptible to flooding but which in the future technology already available could bring into use for housing and hopefully as the technology matures and it reduces in price, can be used in providing affordable housing . We had a lot of support for this in our Vision 2050 consultation 	Noted. No change needed. This whole section seeks to place the Borough within a wider context.
Reading UK CIC	3: Spatial Strategy	<p>Infrastructure and the provision of public transport are critical to Reading's spatial strategy. Reading's Vision 2050 envisages much greater levels of use of buses, trains, cycle ways and footpaths. To prevent Reading coming to a standstill key transport networks providing for these modes of travel must be planned and linked to the spatial strategy and detailed policies. The objective must be to link residential areas to employment areas, the town centre and other key functions such as hospitals, schools, the college and university. Park and ride on the outskirts are critical as are radial and cross town routes. In the longer-term 2050 vision we also envisage bringing the rivers back into use as a mode of travel across the town.</p>	Noted. No change needed. The Local Plan takes account of these issues.
Slough Borough Council	3: Spatial Strategy	<p>Slough supports the principles of the spatial strategy summarized in 3.2.1 as the most sustainable approach to meeting development needs, and the policy response in CC6 (accessibility and the intensity of development); CC7 (design and the public realm); and CC8 (safeguarding amenity).</p>	Noted. No change needed.
University of Reading	3: Spatial Strategy	<p>The University supports the chosen Spatial Strategy for the emerging Local Plan. We find agreement with paragraph 3.1.4 to focus higher density growth (and paragraph 3.2.1 regarding efficient use of land), wherever possible to the central, most sustainable areas of Reading. This would include both the Redlands Road site and the Boat Club site, both of which are within convenient access to nearby facilities and services on foot and by bicycle, and to wider destinations via sustainable transport modes such as bus and rail. To maximise the potential dwelling numbers, as appropriate (subject to appropriate design, layout and mitigation where necessary against potential impacts), both promoted sites at Redlands Road and the Boat Club would accord with the requirement to direct development to the most sustainable locations.</p>	Noted. No change needed.
Chiltern District Council and South Bucks District Council	3.1: Western Berkshire Housing Market Area	<p>We note that the Reading Draft Local Plan makes provision for at least an additional 15,134 homes over the period 2013 to 2036. The shortfall of 943 dwellings will be accommodated elsewhere within the Western Berkshire Housing Market Area based on the West of Berkshire Spatial Planning Framework</p> <p>In responding to Slough's Issues & Options consultation in February 2017, Chiltern and South Bucks Councils expressed concern that although Slough BC estimate there will be a significant shortfall of housing supply against objectively assessed need over their Local Plan period, and given the circumstances in the wider housing market area, we expect Slough BC to consider a full</p>	<p>No change proposed. There has been a request from Slough to the Western Berkshire HMA authorities with regard to its unmet need, to which the authorities have jointly responded. Reading's position is clear, in that it cannot fully meet its own needs within its boundaries, and is not therefore in a position to accept unmet need from</p>

		<p>range of reasonable options for accommodating any unmet needs. We therefore request that Slough's expected unmet housing need form part of the dialogue that will be taking place in Western Berkshire based on the West of Berkshire Spatial Planning Framework within the framework of the Duty to Co-operate. Such an approach would be consistent with national policy in respect of the Green Belt, and also the Housing White Paper.</p>	<p>outside the HMA.</p>
<p>Chiltern District Council and South Bucks District Council</p>	<p>3.1: Western Berkshire Housing Market Area</p>	<p>The division of Berkshire into two housing market areas appears to have prevented meaningful Duty to Co-operate discussions across wider areas where there is evidence of strong functional relationships. We have a number of concerns with the housing and economic market area geography underpinning the emerging local plans in Berkshire. The Berkshire market area geography (and therefore the emerging Local Plan) does not reflect the joint Chiltern and South Bucks Local Plan evidence when defining best fit areas. We request that Reading BC re-considers the Berkshire housing and economic market geography on functional and best fit bases, taking into account the Buckinghamshire work that identified housing and economic market areas.</p> <p>Studies by ORS and Atkins conclude that Chiltern District falls entirely within a Central Buckinghamshire housing and economic market area. South Bucks District falls partly within the Central Buckinghamshire housing and economic market area, and partly within a Berkshire-wide housing and economic market area with Slough and Bracknell Forest, Reading, West Berkshire, the Royal Borough of Windsor & Maidenhead, and Wokingham. Housing and economic market areas for plan-making purposes are defined on a 'best fit' basis. In most instances the best fit is based on a single local authority area. However, because South Bucks and Chiltern District Councils are preparing a joint local plan the best fit is defined based on the whole plan area. The same evidence also supports a single Berkshire-wide housing and economic market area. Berkshire's own evidence (February 2016, prepared by GL Hearn) points towards strong functional relationships between the Eastern and Western Berkshire HMAs, although the evidence does not define on a map the actual functional housing market area (considered important to meet NPPF requirements and a basis for Duty to Co-operate discussions).</p> <p>We cannot endorse a Berkshire housing market area geography that includes South Bucks District for plan-making purposes. Nor do we recognise a geography that defines an Eastern Berkshire Housing Market Area, whether that includes or excludes South Bucks District.</p> <p>There are inconsistencies between the housing market and economic market geographies in Berkshire. Evidence on the latter (prepared for Berkshire by NLP, 2016) concludes that there are three functional economic areas operating across Berkshire. We suggest that it is not logical for the single local authority area of Windsor & Maidenhead to sit across two FEMAs on a best fit basis. Our view supports the argument for a single Berkshire-wide functional economic market area.</p>	<p>Not agreed. No change proposed.</p> <p>The Council does not agree with Chiltern and South Bucks' position here. The SHMA demonstrates the strong functional relationship that a large proportion of South Bucks has with the eastern Berkshire authorities, and this is also reflected in the Buckinghamshire work. It is considered in that work that South Bucks falls into the Central Bucks grouping purely on the basis of best-fit because a joint Chiltern and South Bucks plan is in preparation. This does not change the functional geography.</p> <p>Nor is it the case that the Buckinghamshire work fully defines a Berkshire HMA. It does not look at the Berkshire area in sufficient detail to do that, as it is not its purpose. The only recent study which contains adequate assessment to define HMAs within Berkshire is the Berkshire SHMA.</p> <p>Nevertheless, discussions under the duty to co-operate have continued across both Berkshire HMAs recognising that there are of course linkages.</p> <p>The reasoning for the FEMA definition are set out in the FEMA study. This Council agrees with its conclusions,</p>

		<p>The Berkshire SHMA could be out-of-date (or could become out-of-date) following changes in input data. The following points should be addressed before the Borough Local Plan is submitted:</p> <ul style="list-style-type: none"> • The most recent population and household projections (ONS 2014-based Sub-National Population Projections, 2015 Mid-Year Estimate, CLG 2014-based Household Projections) • Updated Economic Activity Rate data • The latest economic forecasts from both Experian and Oxford Economics • Additional work on the housing requirements of particular groups including Starter Homes • Any relevant case law or Examination outcomes • Update of the affordable housing analysis and associated reporting • Update of the market signals indicators. 	<p>and it reflects the complexity of geographies in the area.</p> <p>There will always be updated data which could slightly change the conclusions of assessments such as the SHMA. At some point, the Council has to identify a figure to form the basis of its planning. The Berkshire SHMA figure is considered sufficiently robust to form that basis.</p>
West Berkshire District Council	3.1: Western Berkshire Housing Market Area	<p>As a co-author of the West of Berkshire Housing Strategy, West Berkshire District Council agrees that the housing requirement of Reading, Bracknell Forest, Wokingham and West Berkshire should be met within this spatial area.</p> <p>The West of Berkshire Housing Strategy identifies that there is a possible large development opportunity in the Grazeley area (south of the M4); an area that straddles both West Berkshire and Wokingham districts. If development were to come forward in the long-term, then there is the potential for some or all of Reading's unmet housing needs to be accommodated within this area. Nonetheless, such a proposal is not currently included within either West Berkshire's or Wokingham's development plans and further work is still required to assess the potential of this development opportunity.</p>	Noted. No change proposed. The Council will continue to work with neighbouring authorities on the opportunity at Grazeley.
Persimmon Homes	3.2: Spatial Strategy for Reading	<p>It is proposed that a significant proportion of the development to be provided in Reading within the plan period will be within the central area. This will include 7,700 homes which makes up 51% of the total housing requirement as proposed within the Local Plan. Whilst it is acknowledged that there are constraints within Reading which particularly affect areas outside the central area, this quantum of development for the town centre to absorb seems excessive. There will be a significant number of flats which will be an unacceptably high proportion of total housing provision and these will likely be built at an extremely high density. The town centre is not of a substantial size and is already heavily developed. Reading will remain attractive to families looking to relocate into areas outside London but that allow good access into the capital.</p>	Noted. No change needed. It is not clear what the alternative to this strategy would be. It is simply a fact of the Borough's geography that the main opportunities to deliver significant levels of housing in line with the NPPF are in the town centre.
Bellway Homes Ltd	Paragraphs 3.2.1 and 3.2.11	<p>Support is expressed for those parts of the plan, which acknowledge that due to Reading's highly developed area with limited available land resource, the best use of that land will be made to deliver as many new homes as possible to meet identified needs. This includes the need to increase densities of development in areas with high levels of accessibility by public transport, walking and cycling.</p>	Noted. No change needed.
Reading Friends of the Earth	Paragraph 3.2.3	<p>It is accessible by rail but that only works if both origins and destinations of journeys are accessible by rail. To take more activity must reduce road traffic in the town meaning a greater reliance on public transport for peak-time travel.</p>	Noted. No change needed.

Reading Friends of the Earth	Paragraph 3.2.3	<p>How sustainable are tall buildings?</p> <ul style="list-style-type: none"> • Do they shade other buildings reducing potential for solar energy capture? • How high is the embodied carbon and energy in use? • How much of their demand can be met from ground-sourced heat? • If residential, is it acceptable to have little per-capita local greenspace? 	No change proposed. Tall buildings can be sustainable, but much depends on the specifics of their design and location. These buildings will need to conform to the same sustainability policies as all other buildings.
Reading UK CIC	Paragraph 3.2.3	We support the focus of development on central Reading given its focus on retail and employment and excellent accessibility by public transport. There is evidence of increasing numbers of people living in the centre of Reading, especially students and young professionals, albeit in small units of accommodation. It is also important to maintain both the high levels of office development in the centre and people working there to support the retail and leisure core. The mix of offices, retail and housing units also make for a very vibrant town centre that is sustainable where many other town centres are dying. Evidence from our 2050 vision work suggests that we should embrace the rivers in the town centre - especially the Thames. Future development and infrastructure should begin to turn the towns face towards the river and utilise the banks of the River Thames and link it into the town. Again we believe the technology will soon be able to overcome some of the current constraints to development caused by flooding.	Noted. No change needed.
Reading UK CIC	Paragraph 3.2.3	It is also time to tidy up areas on the edges of the town centre moving retail and warehousing out of the town centre to more appropriate sites (e.g.A33 corridor) and replacing it with urban living accommodation (including low level, family housing). Our Vision 2050 also envisages the longer-term greening of the IDR, tunnelling it under ground, and the local plan should consider this in the future by safeguarding land/ site so this is possible when appropriate investment can be found.	Noted. No change needed. The Local Plan seeks to make better use of these town centre sites. Re greening of the IDR, it is not clear at this stage how that would be delivered, and it does not form part of the Local Transport Plan.
Environment Agency	Paragraph 3.2.5	Reference is made to the risk of flooding and rivers being physical barriers to movement. This focuses only on the constraints that rivers impose. More emphasis should be put on the opportunities that rivers provide.	No change proposed. The reference is appropriate within the context of this paragraph. References to the opportunities that rivers provide are elsewhere in the document.
Natural England	Paragraph 3.2.5	Suggested change: "In addition, a reliance on Central Reading to deliver housing will inevitably mean that many of the dwellings delivered will be small with little private outdoor space. This will require innovative use of green infrastructural to provide residents with a green healthy living environment. It also means that development that takes place in other areas must give a greater focus on the provision of much-needed family housing."	No change proposed. This change would confuse the purpose of this paragraph. References to providing adequate green infrastructure need to be made elsewhere in the document.
Reading Friends of the Earth	Paragraph 3.2.5	A33 is the major road transport link to central Reading from M4. It will be heavily used by freight as well as commuters and business travel. It can already be quite congested - general traffic levels should be reduced to allow for freight and public transport use.	Noted. No change proposed. The south Reading MRT proposal and Green Park Station will both help to achieve modal shift on this corridor.
Reading UK CIC	Paragraph 3.2.6	We agree with the provision of housing, especially affordable housing, in South Reading. This is	Noted. No change needed.

		<p>an area with some of the highest levels of deprivation in the region and the country, where the provision of affordable housing and local employment provision is very important.</p>	
Thames Properties Ltd	Paragraph 3.2.10	<p>Thames Properties agree that a balance must be struck between the retention of existing, suitable employment land for that use to meet the demand for employment floorspace, and the redevelopment of redundant land, no longer suitable for purpose, to meet the demand for housing.</p> <p>Thames Properties welcome the flexibility within the Plan for the release of some employment land for residential use and the identification of the eastern edge of the Richfield CEA as a suitable location for housing. The Plan does not provide specific justification for releasing the eastern edge of the CEA for housing and does not explain why these areas are considered suitable for residential development, but not the remainder of the CEA.</p> <p>The release of the eastern edge of the Richfield Avenue CEA is logical given its proximity to residential development on Addison Road and Cardiff Road. The same could also be said for land to the south of the Richfield CEA immediately opposite existing dwellings on Cardiff Road, but no explanation is provided to justify why this land has been retained within the CEA.</p> <p>Whilst the redevelopment of the eastern edge of the Richfield CEA will create a buffer between existing dwellings to the east and the edge of the CEA, it inevitably means that future occupiers of these eastern fringe sites will be located immediately adjacent to the retained employment uses. Paragraph 3.2.10 implies that 'pure employment' uses will continue in CEAs (industrial, storage and distribution uses). Such uses may be harmful to residential amenity with respect to noise, fumes, dust or traffic movements and may be unsuitable in such close proximity to residential dwellings.</p> <p>In order to provide a more suitable transition between employment and residential uses, the Plan should allow for flexibility in the Richfield CEA to provide more mixed commercial uses that still fulfil the purposes of employment, but are more sensitive to neighbouring dwellings.</p>	<p>No change proposed.</p> <p>The plan allows for limited release of these sites on the eastern fringe of the CEA, because it resolves current difficult relationships and allows the buffer between residential and commercial uses to be properly planned. In addition, sites such as Cox and Wyman is a large, bespoke employment site with little future prospect of employment use.</p> <p>Policies within the Employment section seek to retain employment use in the first instance, although flexibility is built in for related commercial uses where the site is otherwise likely to be vacant in the long term.</p>
Chris Bedford	Paragraph 3.2.12	<p>3.2.12 and the Plan's transport proposals appear to assume that journeys from developments outside the Borough will be to or via the town centre, much of it on radial roads with finite capacity, whereas work journeys may be to sites such as Thames Valley Park or Portman Road. Transport proposals give inadequate consideration to such peripheral journeys, and the issue would become even more pressing were an eastern Thames crossing to be built.</p>	<p>No change proposed. The Local Transport Plan considers peripheral journeys, and schemes such as MRT take this into account.</p>
Reading UK CIC	4.1: Cross-Cutting Policies	<p>We support the cross cutting themes as being consistent with Vision 2050 for Reading.</p>	<p>Noted. No change needed.</p>
Reading UK CIC	4.1: Cross-Cutting Policies	<p>We would recommend an addition in respect of Reading as a smart town of the future. We would recommend the addition of an additional cross cutting theme which refers to the adoption and integration of greater levels of information and communication technology, especially the</p>	<p>No change needed. The objective is supported, but it is not clear how this would translate into a land use</p>

		utilisation of the 'internet of things' in all types of developments, social economic and environmental in a way that will transform the quality of life of people living working and visiting Reading.	planning policy.
Reading UK CIC	4.1: Cross-Cutting Policies	Although there may be no intention to rank the cross cutting themes we would suggest that securing the right infrastructure CC9, should probably come second after CC1 as it is probably the most critical in enabling all the other cross cutting themes to be realised.	No change proposed. The policies are not ranked in order of importance.
Thames Valley Berkshire LEP	4.1: Cross-Cutting Policies	We are the authors of a European Structural & Investment Funds (ESIF) Strategy, which includes a strong focus on Low Carbon; we are collaborating with RBC's Sustainability Manager/Climate Berkshire on this and the wider sustainability agenda.	Noted. No change needed.
Green Park Reading No. 1 LLP	CC1: Presumption in Favour of Sustainable Development	GPR welcomes the Council's approach of working proactively with applicants to find development solutions that represent sustainable development. In support of the promotion of sustainable development which improves the economic, social and environmental conditions of an area, GPR requests that Policy CC1 reflects the local sustainability issues in the area. In Reading Borough, one of the key constraints is land availability. GPR consider, therefore, that the sustainability policy should make specific reference to making the most efficient use of suitable, urban area sites and relieving pressure on less sustainable land and uses. This would include maximising building densities and heights in well connected transport hubs and corridors.	No change needed. It is agreed that most efficient use should be made of suitable urban sites. This is the purpose of CC4. CC1 is more of a policy statement of how decisions should be made overall in the context of the NPPF and local policy, and it is important not to confuse its purpose with development policy statements.
Reading Friends of the Earth	CC1: Presumption in Favour of Sustainable Development	We appreciate that such a policy is required to demonstrate compliance with the NPPF. This policy gives no weight to global impacts - in particular climate change - but only refers to local impacts. It is not enough to "secure development that improves the economic, social and environmental conditions in the area" - there should be a commitment to contribute to long-term improvement in global environmental conditions - to 'living within the planet's environmental limits' as acknowledged in the quotation from 'Securing the Future' in the NPPF - and to the 'environmental role' described in paragraph 7 of the NPPF. We understand that according to Section 19 of the Planning and Compulsory Purchase Act 2004, as amended in 2008, there is a duty that development plan documents must contribute to climate change mitigation and adaptation.	No change needed. It is considered that securing sustainable development within the local area contributes to long-term improvement in global environmental conditions. CC2, CC3 and EN17 deal directly with climate change mitigation and adaptation. In addition, each allocated site has been assessed for environmental sustainability, including its impacts on and ability to adapt to climate change.
Veronica Leeke	CC2: Sustainable Design and Construction	I support the council's commitment to sustainable design and construction (CC2), quoting BREEAM standards	Noted. No change proposed.
Mr J S Mangat	CC2: Sustainable	CC2 appears to place an unfair and disproportionate burden on small businesses by requiring	Not agreed, no change proposed. This

	Design and Construction	them to meet BREEAM Very Good and incorporate water conservation measures. The cost of employing a BREEAM inspector is very expensive and to require all minor developments to meet this standard is I believe contrary to NPPF paragraphs 21 and 173.	requirement is unlikely to over-burden business and is intended to meet environmental requirements set out in the NPPF. Each application is assessed on a case-by-case basis with viability considerations.
Reading Friends of the Earth	CC2: Sustainable Design and Construction	Buildings should be designed with energy use reduction as a key objective.	Agreed, no change proposed. Reduced energy use is a key component of BREEAM standards.
Reading Friends of the Earth	CC2: Sustainable Design and Construction	This policy should be expanded to address all development, If not then the heading should change to clarify that this applies only to non-residential development.	Noted. No change proposed. The policy itself makes clear that CC2 applies to non-residential development and that H5 addresses sustainable design and construction for residential development.
Reading Friends of the Earth	CC2: Sustainable Design and Construction	BREAM 'Excellent' or better should be the standard everywhere for non-residential development.	Not agreed, no change proposed. It is considered that requiring 'excellent' standards for minor developments may place undue burden on developers. 'Very Good' is required as a minimum and developers will be encouraged to achieve the highest standard possible.
Reading Friends of the Earth	CC2: Sustainable Design and Construction	Lifetime carbon emissions - including both embodied and use-phase carbon - should be assessed using the emerging RICS Whole-Life Carbon Professional Statement method to ensure that the best design choices are being made to minimise climate impacts.	No change proposed. While lifetime carbon emissions is an important consideration, BREEAM standards adequately address carbon emissions.
Reading Friends of the Earth	CC2: Sustainable Design and Construction	There is an emerging need to improve choice of materials to improve internal air quality. (see 'Better homes, better air, better health'. Ref: ARCC, 2017.	No change proposed. Where development is proposed that would affect air quality, planning can only focus on outdoor air quality. Where development is proposed within areas of poorer air quality, the policy requires that effects are mitigated through design. It will be for applicants to find solutions (and these may change significantly over the plan period) and demonstrate how they comply with this requirement.
Reading Friends	CC2: Sustainable	Recycled materials should be made use of where practicable.	No change proposed. Reuse of

of the Earth	Design and Construction		materials is considered by BREEAM standards.
Reading Urban Wildlife Group	CC2: Sustainable Design and Construction	It is hard to envisage a major non-residential development where recycling grey water and rainwater harvesting are not energy efficient and, we would suggest, if not cost-effective then cannot be so expensive as to ruin the development. Similarly, major new non-residential developments should meet the BREEAM excellent standards at all times, not just where possible	No change proposed. Major non-residential development will be encouraged to pursue these measures through the BREEAM standards. It is considered that requiring 'excellent' standards for minor developments may place undue burden on developers. 'Very Good' is required as a minimum and developers will be encouraged to achieve the highest standard possible
Reading Urban Wildlife Group	CC2: Sustainable Design and Construction	Change the new minor non-residential developments to meet BREEAM "excellent" standard where possible.	Not agreed, no change proposed. It is considered that requiring 'excellent' standards for minor developments may place undue burden on developers. 'Very Good' is required as a minimum and developers will be encouraged to achieve the highest standard possible.
Reading Friends of the Earth	Paragraph 4.1.2	4.1.2 refers to the Climate Change Strategy - but this only has a target to 2020 when the Plan extends to 2036. Longer-term goals should be cited.	No change proposed. While it is important to cite long-term climate change goals, the Climate Change Strategy is the most recent strategy published. Section 2 of the Local Plan cites many environmental objectives for the longer-term.
Chris Bedford	CC3: Adaptation to Climate Change	The first requirement in CC3, concerning building orientation, is too prescriptive, and needs to be balanced against townscape considerations. In any case, the purposes cited may be achieved by other means, such as conservatories and rain screens.	Not agreed, no change proposed. Townscape impacts will always be taken into consideration. Climate change mitigation and adaptation is a major aim of the plan, according to the NPPF. Design impacts are subject to other policies in the plan.
Environment Agency	CC3: Adaptation to Climate Change	The last bullet point of this policy mentions that all development should 'consider mitigation and resilience measures for any increases in river levels as a result of climate change'. We think this should be more strongly worded and the word consider be changed to say 'shall mitigate and incorporate resilience measures.....' to ensure it is consistent with paragraph 103 of the NPPF which requires "development to be appropriately resilient and resistant."	Agreed. Change proposed. Wording should be amended, although it will not be possible in 100% of cases.
Environment	CC3: Adaptation to	With regard to the third bullet point, there should be an emphasis on appropriate native	No change proposed. It is agreed that

Agency	Climate Change	planting, particularly along river corridors and when connecting areas of ecological value.	native planting is an important consideration, but this is addressed by policies EN12 and EN14.
Veronica Leeke	CC3: Adaptation to Climate Change	I support the conditions set out in CC3 in order to adapt to climate change	Noted. No change needed.
Reading Friends of the Earth	CC3: Adaptation to Climate Change	Special mention should be made of the need design-in low-carbon techniques to address risks of over-heating. The ability to open windows is important, as well as mechanical ventilation and heat recovery/cooling techniques. Thermal mass can help keep buildings cool in summer and warm in winter.	No change proposed. It is considered that design-in low-carbon techniques are addressed by policies CC2 and H5.
Reading Friends of the Earth	CC3: Adaptation to Climate Change	Grassed and planted areas can be very useful in reducing water runoff.	Noted. No change needed. This is addressed in policy EN18.
Reading Friends of the Earth	CC3: Adaptation to Climate Change	Green roofs and walls may be useful but their lifetime costs and benefits should be assessed with care to avoid 'greenwash'.	Noted. No change needed. Green roofs and walls will be considered on a case-by-case basis with all known environmental costs and benefits in mind.
Reading Urban Wildlife Group	CC3: Adaptation to Climate Change	Point 2. Design for through ventilation	No change proposed. This point already includes mention of ventilation considerations.
Reading Urban Wildlife Group	CC3: Adaptation to Climate Change	Add thermal mass	Agreed. Change proposed to include thermal mass.
Reading Urban Wildlife Group	CC3: Adaptation to Climate Change	Add green walls	Agreed. Change proposed to include green walls.
University of Reading	CC3: Adaptation to Climate Change	The University are fully supportive of the principle of this policy, however, its wording would benefit from the following changed text; "All developments will be required to demonstrate ..." and "The following measures shall be incorporated, where viable, appropriate and reasonable, into new development". The main difficulty with the wording as drafted within the Draft Plan is that not all measures listed within the policy will be appropriate for every development. The potential impact on viability would also be a material consideration and would therefore influence whether the proposed development would proceed or not. Therefore, we feel it reasonable to insert reasoned considerations, introducing whether the measure is appropriate, whether it is reasonable and also whether it would create viability problems for the development.	No change proposed. It is not considered necessary to include "where viable, appropriate and reasonable" as each application is considered case-by-case with viability in mind. Most developments will be able to incorporate some or all of these measures and remain viable. More information is available in the viability assessment of the Draft Local Plan.
Reading Urban Wildlife Group	Paragraph 4.1.8	Add to 4.1.8 including design of car parking areas with run-off to planting areas	No change proposed. This is addressed in policy EN18.
Chris Bedford	Paragraphs 4.1.9 to 4.1.11	EN17 and text deal usefully with these matters. 4.1.9 to 4.1.11 overlap with them and muddy the issue. In particular, surface water flooding is not as implied linked to closeness of rivers; green roofs are a sustainable drainage tool, not a means of flood proofing; and 4.1.11 is confusing if not	Partially agree. Change proposed to specify that green roofs are a sustainable drainage tool, not a flood

		put in the context of policy EN17, so would fit better after 4.2.88.	proofing technique. It is not considered to be confusing to emphasise flooding in both CC3 and EN18. As flooding is a major concern, its mention in both sections aims to stress its importance.
Environment Agency	Paragraph 4.1.9	This paragraph mentions the floods of 2007 and 2008 but not the more recent floods of 2013/14 in which Reading was affected by fluvial flooding, mainly to the areas of Circuit Lane in Southcote, Caversham and Scours Lane. The 2013/2014 floods will need to be included within your evidence base to ensure it is up-to-date.	Noted. No change needed. The evidence base does include more recent floods of 2013/14.
Environment Agency	Paragraph 4.1.9	This paragraph mentions the River Thames, the River Kennet and the Holy Brook, but fails to mention the Foudry Brook and its tributaries, the Berry Brook, Vastern Ditch, Christchurch Ditch, The Creek along the base of the Warren escarpment or the many ditches/watercourses on the Kennet floodplain upstream of the A33. For the purposes of clarity and accuracy these rivers should also be included within this paragraph.	Agreed. Change proposed. These watercourses should be mentioned.
Environment Agency	Paragraph 4.1.11	This paragraph mentions removable floorboards that can be removed before water enters a building. Raising the height of the finished floor levels above a predicted flood level is a better alternative and should consider all types of flooding i.e. fluvial, surface water, groundwater. Only surface water is mentioned.	Agreed. Change proposed.
Booker Group PLC	CC4: Decentralised Energy	We agree that, in order to meet the requirements set out in the NPPF, it is necessary to include a policy in the Local Plan which promotes the use of energy from renewable or low carbon sources, and in this regard Policy CC4 is appropriate. However, the requirements should be subject to viability and allow sufficient flexibility for developers to provide justification to provide carbon reduction measures that are appropriate for the needs of development.	No change proposed. The NPPF actively promotes identification of opportunities for decentralised energy. The policy clearly states a requirement for "consideration" of decentralised energy. Requirements are subject to viability.
Reading Friends of the Earth	CC4: Decentralised Energy	Decentralised energy as covered in this policy - essentially CHP and District Heating - should be encouraged. Note there can be significant issues around sustainability of biomass, especially if not locally sourced, and gas-fired DH/CHP may well not be seen as sufficiently low-carbon in the longer term unless some form of 'green gas' becomes available or carbon capture is implemented. There are also very significant concerns about the impact on air quality from biomass combustion.	No change proposed. This policy is intended to give a general overview of requirements and does not necessarily weigh the pros and cons of particular systems over others. The Council's Heat Masterplanning Study addresses this issue in detail.
Reading Friends of the Earth	CC4: Decentralised Energy	Policy should be broadened to cover on-site renewable energy techniques such as solar PV, solar thermal, ground-sourced heat and air-sourced heat if these are not addressed elsewhere.	No change needed. These techniques are listed in the supporting text, paragraph 4.1.15.
Reading Friends of the Earth	CC4: Decentralised Energy	Developers should be required to demonstrate that they are taking all possible steps to reduce energy use and once carried out then to increase on-site energy capture, and to reduce emissions and future energy costs.	No change proposed. Other policies (CC2 and H5) require developers to reduce energy use in the first instance,

			as well as reduce emissions.
Reading Urban Wildlife Group	CC4: Decentralised Energy	Para 2 remove biomass-fuelled heating scheme from this policy. There have been a number of studies showing air pollution impact of small scale wood biomass burners.	Agreed. Change proposed.
Reading Urban Wildlife Group	CC4: Decentralised Energy	Allow for developments in south reading (near to the island road site), to put in infrastructure to connect to a future energy from waste plant. Current waste goes to colnbrook incinerator that will have to close if the preferred Heathrow runway project goes ahead. It would be tragic if new development in Reading could not connect to a replacement plant in this area. The policy should allow the council to insist on infrastructure even if it is not suitable economically for a particular site.	This policy does not preclude the use of energy from waste plants. The heat masterplanning work recently commissioned by the Council found no existing economically viable opportunities for energy from waste plants, and there are no current proposals. If this opportunity arises in the future, this policy allows for waste energy to be pursued.
Reading Urban Wildlife Group	CC4: Decentralised Energy	Commercial buildings should incorporate solar panels	It is considered that the most effective way to increase decentralised energy is to allow individual developers to pursue whatever methods achieve decentralised energy requirements and emissions reductions.
Reading Urban Wildlife Group	CC4: Decentralised Energy	Who runs a community scheme of only 20 dwellings? Is this economic?	No change proposed. The policy states that development of more than 20 dwellings should <i>consider</i> CHP. If it is not economic, it would not occur due to viability issues.
Reading Urban Wildlife Group	CC4: Decentralised Energy	If there is going to be a community plant area, then there should be enough spare space for batteries in the future. We can expect better quality batteries in the future for storing wind and solar energy.	Noted. No change proposed. The space set aside for CHP plants will likely be large enough to accommodate storage.
SGN plc	CC4: Decentralised Energy	The flexibility that has been built into the draft policy wording is welcomed and supported. In the event that a connection to the existing network is not feasible (for example due to viability or ownership constraints), the supporting text to Policy CC4 should set out further details as to the level of information that the Council will require in order to demonstrate this. This will provide more clarity for landowners and developers, and should help to expedite discussions during the pre-application and application process.	No change proposed. There might be a variety of reasons why it is not feasible to connect, and this may also change with changing technologies. It is not possible for the supporting text to anticipate this.
SGN plc	CC4: Decentralised Energy	It is also not clear what evidence the Council has used to determine the threshold of 10 dwellings for schemes in the vicinity of existing decentralised energy provision, or the threshold of 20 dwellings elsewhere. The Feasibility Study of the Borough prepared by Thames Valley Energy (TVE), to which paragraph 4.1.18 of the Draft Local Plan refers, is not included as part of the consultation documentation, and neither the Sustainability Appraisal nor the Infrastructure Delivery Plan refer to how these thresholds have been derived. This should be clarified prior to	No change proposed. The 20-dwelling threshold was originally included in the SDPD, and was based on work by Thames Valley Energy.

		the publication of the Pre-Submission version of the Plan, as using these relatively low thresholds may have implications for the viability of smaller residential developments.	
University of Reading	CC4: Decentralised Energy	<p>Whilst the University supports sustainable energy, the current policy wording omits one key consideration. Renewable energy, such as biomass or CHP can add considerable cost to a development which may adversely effect its viability, however, the ability of a scheme to have sufficient profit margins in order to pay for decentralised energy has not been included within this policy.</p> <p>We would recommend that paragraph two is amended to read: “Any development of more than 20 dwellings and / or nonresidential development of over 1,000sqm shall consider the inclusion of a CHP plant, or biomass-fuelled heating scheme, or other form of decentralised energy provision, within the site, unless it can be demonstrated that it would not be suitable, feasible or viable.”</p>	Agreed. Change proposed.
Conservation Area Advisory Committee (CAAC), with comments and support from Reading Civic Society (RCS), Caversham and District Residents Association (CADRA), Baker Street Area Neighbourhood Association (BSANA), the Bell Tower Community Association (BTCA), Katesgrove Community Association (KCA) and the Redlands NAG	CC5: Waste Minimisation and Storage	<p>We suggest the following additional language: “[...] promotion of layouts and designs that provide <i>sufficient space for increased density, in excess of the original design, to ensure adequate space to facilitate waste storage, reuse, recycling and composting. Facilities should be discreet so waste storage does not dominate the street scene.</i></p> <p>We would recommend that this sentence from 4.1.23 be moved to a separate paragraph and edit as follows: “As a consequence, the beneficial restoration and reuse of buildings should generally be considered before demolition and redevelopment.”</p>	<p>Partially agree.</p> <p>Designing waste storage in excess is not considered the best way to use space. In many cases, additional space will not be required in the future.</p> <p>Agree that facilities should be discreet. Change proposed to highlight that storage should be well designed.</p> <p>Agreed that the change to 4.1.23 should be made, although a new paragraph is not required.</p>

Reading Friends of the Earth	CC5: Waste Minimisation	On-site segregation of materials - especially building materials and soils - should be encouraged. Cross-contamination degrades value and increases waste.	No change needed. It should be noted that work is underway on a Joint Minerals and Waste Local Plan which will look at matters such as construction and demolition waste in more detail.
Reading Urban Wildlife Group	CC5: Waste Minimisation	<p>Whilst generally in favour, we think that this is badly worded and tries to say too much in one sentence. It implies that the policy is to reuse and recycle construction materials from the development site, which may be possible but is not always so. It also doesn't clarify that soils are included.</p> <p>Since there is a policy promoting grey water recovery and rainwater harvesting, there will be considerable excavation for putting the storage tanks into the ground, resulting in a higher proportion of soils being excavated than at previous times. It may be possible to reuse on site, but if not it is extremely important that these are kept separate from other construction materials and sent off-site for reuse/recycling.</p> <p>On large redevelopment sites, it is possible to sort and process some of the demolition waste on site. At other times the material needs to go off-site for recycling. Whilst it may be preferable for on-site recycling, the variety of equipment available at a major recycling depot means that a wider range of usable materials can be produced. The important thing is that waste is minimised, surplus material go for reuse or recycling on or off site and that the construction uses recovered materials where possible.</p> <p>We would also like to see a policy that makes developers consider the location of wheely bins and how these can be stored without creating an eyesore. There are some very good designs with a green roof.</p> <p>We suggest</p> <p>"sustainable approaches to waste management, including waste minimisation on site, the sorting, reuse or recycling of construction waste including soils on or off-site and the inclusion of recovered materials in the new development. The development should promote layouts and designs that Composting and consider the design of storage areas for wheelybins"</p>	<p>Partially agree. No change proposed. While the response raises many important points, this policy is not intended to go into depth about waste minimisation and storage. BREEAM standards required by policy CC2 include more detail on these matters, as well as the Council's Sustainable Design and Construction SPD.</p> <p>Change proposed to ensure that waste storage is well-designed.</p>
Environment Agency	CC6: Accessibility and the Intensity of Development	Please be aware that increasing the scale and density in areas at risk from flooding will put more people at risk and will not be allowed unless the Flood Zone is appropriate, the sequential test and if required, exception test is passed. Placing more people in areas at risk of flooding results in more people not having safe access and egress from the area. This also places increased pressure on emergency planners, rescue services etc.	Noted. Where relevant, site allocations will be supported by a Sequential and Exception Test.

Reading Friends of the Earth	CC6: Accessibility and the Intensity of Development	Much improved cycling and bus provision is required. If their projects add to aggregate demand developers should be required to contribute to this across the network, not merely close to their sites.	No change proposed. The Transport section deals with improved cycling and bus provision.
Reading Friends of the Earth	CC6: Accessibility and the Intensity of Development	Developers should be required to install cycle-parking provision and showers on-site at workplaces.	No change proposed. The parking policy and Parking Standards and Design SPD ensure cycle parking provision. Provision of showers in workspaces is a potential element of achieving BREEAM standards in line with policy CC2.
Reading Friends of the Earth	CC6: Accessibility and the Intensity of Development	Bus-priority measures are needed so that buses run frequently and on time - offering attractive alternatives to the private car.	No change proposed. The Transport section deals with improved bus provision.
Ropemaker Properties Ltd	CC6: Accessibility and the Intensity of Development	It is agreed that development should be focused in the most accessible areas for in relation to public transport, walking and cycling to a range of services and facilities. It is also agreed that in Reading, the town centre has the highest level of accessibility.	Noted. No change proposed.
University of Reading	CC6: Accessibility and the Intensity of Development	The University considers that sustainable access to facilities, as is available for the promoted sites at Redlands Road and the Boat Club site, is very important in order to ensure compliance with the requirements of the NPPF. The University support the inclusion of this Policy.	Noted. No change proposed.
Environment Agency	Paragraph 4.1.27	This paragraph again refers to rivers as barriers/constraints rather than as opportunities and features. The emphasis should be changed so rivers are seen as assets rather than barriers for development.	No change proposed. The reference makes sense in its context, and making the change suggested would confuse the meaning of the paragraph. The importance of rivers as assets is set out in many other parts of the plan.
Reading Friends of the Earth	Paragraph 4.1.27	4.1.27 refers to a proposed standard for bus services within 400m of locations. 400m is a long way for many elderly people to walk. Bus shelters with seating should be provided - especially important for elderly people and where the service is likely to be infrequent.	Noted. No change needed. The point is taken, but this is set out as a rule of thumb only, and represents a reasonable compromise between ideal accessibility and what is achievable in most cases.
Reading Urban Wildlife Group	Paragraph 4.1.27	400m is probably a reasonable compromise, but it is more than many older people can manage, particularly if there is no seating area at the bus stop, or the area is on a hill.	
Aviva Life and Pensions UK Ltd	CC7: Design and the Public Realm	It would be helpful to the understanding, clarity, and application of the policy if definitions of "high design quality" and "major developments" are provided in the supporting text.	Do not agree. No change proposed. "High design quality" is defined within the policy as making a positive contribution to the objectives listed. "Major development" is defined throughout the plan and includes those of over 10 dwellings or 1,000 sq m of non-residential floorspace.

Bell Tower Community Association	CC7: Design and the Public Realm	<p>We agree that any development should reflect the landscape and heritage of the town. We would seek to avoid a repeat of the disregard for heritage and landscape shown in the expansion of EP Collier School. We therefore would like future developments to adhere to the following principles:</p> <p>Development which would cause material harm to the character and/or appearance of a non-designated but historic area should not be permitted. All developments should protect the amenity of existing and future residents as outlined in policy CC8. Proposals should:</p> <ul style="list-style-type: none"> - contribute to the quality of the local environment and compensate for building on flood plain; - retain historical features; - respect the existing layout, scale, density and proportion of existing buildings; - integrate into the local community. 	<p>Do not agree. No change needed. Each of the concerns listed is addressed by other policies. CC7 itself ensure that development make a positive contribution to local character and respect the scale and density of existing buildings, as well as exhibit ease of movement and permeability. Flooding is addressed by policy EN17. Retention and promotion of historical features is required by policies EN1 and EN6.</p>
Booker Group PLC	CC7: Design and the Public Realm	<p>We agree that a high quality of design is required for all developments, as it is an integral part of ensuring the delivery of sustainable development, as set out in the NPPF (Chapter 7). Policy CC7 should seek to address the points listed at paragraph 58 of the NPPF in order to ensure compliance with the national guidance.</p> <p>We would welcome a policy approach which would provide sufficient flexibility for design of development to be guided through individual circumstances rather than being dictated by strict policy requirements, along with confirmation that design criteria will only be considered where material to an application.</p> <p>We would also welcome a design policy that avoids unnecessary prescription or detail and which concentrates on "guiding the overall scale, density, massing, height, landscape, materials and access of new development", in accordance with Paragraph 59 of the NPPF.</p>	<p>No change proposed. Each of the points listed in paragraph 58 of the NPPF are addressed by policies within the plan.</p> <p>This policy does provide sufficient flexibility and each application will be considered on a case-by-case basis. According the planning guidance, layout, density, visual appearance and materials are considered material planning considerations.</p> <p>This policy is not considered to propose unnecessary requirements and is in line with the NPPF. Each requirement contributes to "guiding the overall scale, density, massing, height, landscape, materials and access."</p>
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	CC7: Design and the Public Realm	<p>We would like to see the historic environment highlighted with the first paragraph of the policy and suggest the following language: "[...] of the area of Reading in which it is located <i>with particular regard to areas and buildings of historical interest</i>. The various components of development [...]"</p> <p>We would like to see the following added to the end of the policy: "<i>Supplementary planning documents will inform the Design and Access Statement. Applications that do not provide an</i></p>	<p>Partially agreed. Change proposed.</p> <p>It is considered that this policy sufficiently addresses heritage with the following: "Developments will also be assessed to ensure that they respond positively to their local</p>

		<p><i>appropriate level of detail will be refused."</i></p> <p>We would like to see the following added to the end of paragraph 4.1.35: <i>"Planning conditions will be applied to permissions to ensure materials and details are agreed."</i></p>	<p>context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough..."</p> <p>It is not considered necessary to add reference to SPDs or state that applications that do not provide an appropriate level of detail will be refused. This is assumed and could be applied to every policy in the plan.</p> <p>It is agreed that reference to planning conditions securing materials and details can be made.</p>
Environment Agency	CC7: Design and the Public Realm	The first sentence in this policy should be amended to read: "All development must be of high design quality that maintains and enhances the character, appearance and ecological value of the area of Reading in which it is located."	No change proposed. This starts to confuse the purpose of CC7 and duplicates the content of EN12.
Environment Agency	CC7: Design and the Public Realm	In the second bullet point, add 'and ecology' after "Landscape".	No change proposed. This starts to confuse the purpose of CC7 and duplicates the content of EN12.
Environment Agency	CC7: Design and the Public Realm	In the second set of bullet points, the third bullet point should be amended to read "Quality of public realm and provision of green spaces, ecological corridors and landscaping".	No change proposed. This starts to confuse the purpose of CC7 and duplicates the content of EN12.
Environment Agency	CC7: Design and the Public Realm	In the third set of bullet points, insert 'and ecological' between "historic" and "environment".	No change proposed. This starts to confuse the purpose of CC7 and duplicates the content of EN12.
Historic England	CC7: Design and the Public Realm	We welcome the requirement 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", as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change needed.
Natural England	CC7: Design and the Public Realm	There is no elaboration of this point referring to quality of the public realm and green spaces in the description sections 4.1.29-35. Add a section 4.1.36 - "it is important to consider and include green infrastructure at the early design phase". It is not something that can be tacked on at the end etc.	No change proposed. Green infrastructure is included as a "design issue", and paragraph 4.1.34 states: "There will be a strong expectation that design issues will be dealt with at pre-application stage."
University of	CC7: Design and the	The University support good design in order to comply with the requirements of the NPPF at	No change proposed. It is unclear how

Reading	Public Realm	paragraphs 56 to 68, which consider 'good design'. However, it is recommended that to the beginning of paragraph two of the Policy as drafted the words "All new development proposals ... " is added.	this addition would change the meaning of the policy.
Historic England	Paragraph 4.1.29	We welcome this paragraph, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change needed.
Sport England	Paragraph 4.1.32	Sport England welcomes the Council's inclusion of a reference to Sport England's Active Design principles.	Noted. Not change needed.
Aviva Life and Pensions UK Ltd	CC8: Safeguarding Amenity	This is an important policy. Particularly within the town centre, where density is higher and issues of overlooking, amenity, and overshadowing etc. are most sensitive, rather than a first to secure planning permission "takes all", a more considered approach should, in our view, be developed to ensure that neighbouring sites respect each other and enable equitable development of different parcels to take place, even if over different time horizons. In other words, not expecting one site to absorb the full set-back on its site, because they are not in a position to bring forward development proposals at the same time as the neighbouring site, but rather seeking an equitable setting back, or other solution, between the different sites. We consider the policy wording could be amended to reflect the above.	Partly agreed. Change proposed. It is considered that this is a wider issue than just amenity, and is likely to apply to a range of issues in the centre. For that reason, an additional criterion is suggested to policy CR2 on design in the centre.
Veronica Leeke	CC8: Safeguarding Amenity	I support the conditions set out in CC8 in order to safeguard amenity; with intrusive artificial lighting in particular being disallowed	Noted. No change needed.
McKay Securities PLC	CC8: Safeguarding Amenity	<p>This policy is overcomplicated, repetitive and not robust enough. The reference to development not causing a "significant detrimental impact" implies that harm up to a significant impact may be allowed, but does not specify or clarify what this might be. This is uncertain and unclear.</p> <p>Additionally, the policy lists a number of issues that should not cause detrimental impact but then continues on to identify other impacts to which this policy also applies. The additional criteria relating to operational or traffic movements should not be included in this policy. The additional matters such as hours of operation of businesses, and effects of traffic movements do not give rise to any impacts by themselves which are not already identified in the list above. For instance, traffic movements are not a problem unless they give rise to dust, fumes, noise or smell.</p> <p>Therefore, this section of the policy should be removed. The policy should be amended as follows: "Development will not cause a detrimental impact [...] As well as immediate impacts, other aspects to which this policy applies will include matters such as hours of operation of businesses, and effects of traffic movements, particularly of heavy goods vehicles (HGVs). Proposals which would generate regular movements of HGVs on residential roads will not be acceptable."</p>	<p>Partly agreed. Change proposed.</p> <p>Reference to "significant" should be deleted.</p> <p>It is accepted that HGV movements will typically give rise to the effects identified in the list. However, it is still considered worthy of clarification in the policy to avoid any doubt, and was inserted into the SDPD version in response to representations seeking greater clarity when it originally appeared in that document.</p>
Royal Mail	CC8: Safeguarding Amenity	Royal Mail welcomes the inclusion of draft Policy CC8. However the policy wording could be strengthened to give further protection to the operation of existing businesses. To do so, the Policy should request details of proposed mitigation methods to protect occupiers of a new	Partially agreed. Change proposed. The policy is written to cover this instance, and applies equally to the

		<p>residential development and make clear that development will not be permitted if it is likely to be adversely affected by the impacts listed in the Policy.</p> <p>The protection of existing operations and amenity is a crucial issue for Royal Mail, particularly where there is potential for sanctions to be placed upon them when uses of a sensitive nature are introduced in close proximity to existing Delivery Offices. For example, due to the nature of their delivery requirements and targets, Delivery Offices are operating early mornings and often late evenings, generating large volumes of vehicular movements and associated mail sorting and loading activity - all of which result in noise, light and other associated impacts that are not expected to be experienced in a residential environment. The consequences of any noise-related complaints by neighbouring residents can be costly or disruptive for Royal Mail. This particular issue is clearly recognised within the NPPF at paragraphs 123 and 109.</p> <p>The issue of neighbouring land uses and their compatibility, including potential environmental / amenity impacts, is similarly fundamental to Royal Mail where Local Planning Authorities are assessing the suitability of future land use allocations and development sites. In terms of the current consultation draft, this is of particular relevance to the proposed residential-led development on land north of Manor Farm Road, which has the potential to introduce new residential properties adjacent to the Reading Delivery Office.</p>	<p>location of new residential development where there would be amenity effects on its occupiers. However, it is worth clarifying in the supporting text that the operation of existing businesses should not be constrained by new development through its occupants being subject to a poor standard of amenity.</p>
University of Reading	CC8: Safeguarding Amenity	<p>The University supports the inclusion of Policy CC8. Unfortunately, the Policy as drafted is unclear in places. The first paragraph to the policy should be replaced with: “Development shall not cause an unacceptable level of impact on the general amenities of existing properties, or create unacceptable living conditions for new residential properties, by virtue of adverse impact in terms of:</p> <ul style="list-style-type: none"> • Loss of privacy; • Levels of daylight; • Overbearance and visual dominance; • Visual amenity; • Noise and vibration; • Light disturbance; • Dust and air pollution; • Odour; and • Crime and safety. <p>It is further recommended that the second paragraph is moved into the supporting text to the policy as the wording appears somewhat explanatory and imprecise.</p>	<p>Partly agreed. Change proposed. The first sentence should be restructured, although it should refer to ‘detrimental’ impact in line with the comment from McKay.</p> <p>The second paragraph is a significant and frequently applied part of the policy and needs to be accorded adequate policy weight.</p>
Chris Bedford	Paragraph 4.1.40	<p>The examples in 4.1.40 are unnecessarily constraining. Modern construction can provide good sound insulation, and the juxtapositions cited are commonly found and need not cause problems.</p>	<p>Partly agreed. Change proposed. The reference is still useful and will apply in some cases, but it is agreed that the</p>

			text should reflect the possibility of mitigation.
Aviva Life and Pensions UK Ltd	CC9: Securing Infrastructure	The draft policy proposes that any employment development (not defined) should mitigate its impacts on housing demand. The policy wording would indicate that the LPA may seek a financial contribution from "employment" schemes to pay for residential development (including affordable housing). As a matter of principle, we disagree with this linkage. It is considered overly onerous and tenuous to suggest that non-residential development should be expected to meet worker's needs. It is out of scale and proportion and is considered unjustifiable.	No change proposed. It is not agreed that this requirements should be abandoned. The extent to which new employment development can put pressure on the housing market and exacerbate housing need is clear. Illustrative of this, the SHMA included an uplift in housing need as a result of economic growth. It is not sustainable for significant amounts of employment development to take place with no supporting mitigation of housing impacts.
Environment Agency	CC9: Securing Infrastructure	We support the wording of the second bullet point.	Noted. No change needed.
Green Park Reading No.1 LLP	CC9: Securing Infrastructure	While GPR agrees with the principle of securing the relevant infrastructure (be it social or otherwise) to mitigate any negative development impact, there should be recognition in the policy supporting text of the role previous contributions have made in delivering transport infrastructure in south Reading. Development at Green Park has a long history of contributing significant amounts to transport infrastructure to mitigate future development impact. GPR maintains that the approach should continue to be on capturing transport contributions from uplifts in floorspace only, from those developments which have already made significant investments.	Agreed. Change proposed. The supporting text should recognise that there may have been mitigation measures already agreed or provided.
Green Park Reading No.1 LLP	CC9: Securing Infrastructure	GPR supports the approach of focusing on upskilling and providing other forms of support to ensure jobs are filled as far as possible by the existing population. GPR, however, remains concerned about linking employment development with the provision of affordable housing. The inclusion of affordable housing in the infrastructure policy ignores the commitments to other mitigation measures which are directly relatable to impacts created by commercial development, in terms of upskilling, jobs and indirect economic benefits. Employment development is a land use priority at Green Park and contributions towards affordable housing, in addition to the other mitigation measures, creates an unacceptable burden on development. As demonstrated in the determination of the scheme at 400 Longwater Avenue, Green Park, office development on the Park is at the margins of viability. The policy risks jeopardising future employment development at the Park. Housing developments should be the focus for provision of affordable housing contributions. GPR, therefore, requests	No change proposed. It is not agreed that this requirements should be abandoned. The extent to which new employment development can put pressure on the housing market and exacerbate housing need is clear. Illustrative of this, the SHMA included an uplift in housing need as a result of economic growth. It is not sustainable for significant amounts of employment development to take place with no supporting mitigation of housing impacts.

		that reference to commercial development contributing to affordable housing in Policy CC9 is removed.	
Veronica Leeke	CC9: Securing Infrastructure	I support the council's commitment to securing local infrastructure prior to passing permission for large developments (CC9). In addition, RBC must robustly object to any neighbouring council's allowance of development that would impede on such listed items of infrastructure within the Reading Borough	Noted. No change needed. RBC continues to work actively with neighbouring Boroughs to address impacts on Reading's infrastructure.
McKay Securities PLC	CC9: Securing Infrastructure	<p>The second paragraph of this policy is unnecessarily repetitive, as it is covered by the first paragraph. This over complicates the policy without adding any benefits. Therefore, specific reference to employment development providing mitigation for housing, labour, skills and the transport network is unnecessary as these aspects are captured under the first point of this policy. The second paragraph should be deleted.</p> <p>The way the policy is expressed is unnecessarily restrictive and will hold back and prevent the provision of new employment floorspace as required elsewhere by other planning policies. Matters to do with infrastructure, services, resources and so on are best dealt with through pooled CIL contributions, and it is these rather than planning policy which should seek to recoup the resources identified in the policy. Policy CC9 is not positively prepared and conflicts with the guidance in the NPPF and the NPPG.</p>	<p>No change proposed. It is considered that the second paragraph is needed to clarify that employment development needs to provide mitigation, particularly for housing needs.</p> <p>It is not considered that this requirement is unnecessarily restrictive. Each development will be considered on a case-by-case basis subject to viability in order to avoid undue burdens on development. Section 106 and CIL need to operate in tandem, and a reliance purely on CIL will not adequately address the impacts of every scheme.</p>
Network Rail	CC9: Securing Infrastructure	<p>DPDs should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.</p> <p>Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development. In order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.</p> <p>To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following:</p> <ul style="list-style-type: none"> • Developments on the railway infrastructure should be exempt from CIL or that its development should at least be classified as payments in-kind. 	<p>Transport infrastructure is identified as a major infrastructure provision priority for developments in policy CC9, and it is not considered that a separate policy is required.</p> <p>The plan includes reference to assessments of transport impacts covering impacts on the rail network where relevant. Policy TR1 also includes strong requirements in terms of sustainable transport measures including public transport.</p> <p>Changes to the CIL Charging Schedule and Regulation 123 list are not being consulted upon at this time.</p>

		<ul style="list-style-type: none"> We would encourage the railways to be included on the Regulation 123 list A clear definition of buildings should be in the charging schedule. Railway stations are open-ended gateways to railway infrastructure and should not be treated as buildings. Likewise lineside infrastructure used to operate the railway should be classed as railway infrastructure and not treated as buildings. We would like confirmation that its developments over 100sqm undertaken using our Permitted Development Rights will not be CIL chargeable. Imposing a charge on one infrastructure project to pay for another in an inefficient way of securing funding A requirement for development contributions to deliver improvements to the rail network where appropriate. A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated. A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit. 	
Reading Friends of the Earth	CC9: Securing Infrastructure	Employment development must contribute to necessary infrastructure - see comment on CC6.	Noted. No change needed.
Reading Urban Wildlife Group	CC9: Securing Infrastructure	Change "may" to "should" in "other measures, as follows, may also be considered"	Agree. Change proposed.
South Oxfordshire District Council	CC9: Securing Infrastructure	We note the reference in this policy to giving major cross-boundary or sub-regional infrastructure the highest priority. We are keen to work with you to understand further and in more detail the specific locations and justification for any major cross-boundary or sub-regional infrastructure that will impact upon South Oxfordshire District.	Noted. No change needed. Further information is contained in the Infrastructure Delivery Plan, and the authorities are already working together on cross-Thames travel issues.
University of Reading	CC9: Securing Infrastructure	The University supports the principle of development funded infrastructure where infrastructure is required in order to make a development acceptable. However, we would recommend that the final paragraph is removed.	Do not agree. No change proposed. Developer contributions for ongoing local authority costs for monitoring, implementation and payment of planning contributions is required in order to achieve effective infrastructure delivery.
University of Reading	CC9: Securing Infrastructure	We recommend the first paragraph of the draft policy be replaced with the following: "Proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development are provided through direct provision or financial contributions."	Agree. Change proposed.

West Berkshire District Council	CC9: Securing Infrastructure	The draft Local Plan identifies that new development in West Berkshire will use facilities in Reading, and vice versa, and that there is a need for policy on the areas to be aligned, and to ensure that infrastructure provision in both Reading and West Berkshire is viewed in the context of the area as a whole. As West Berkshire District Council has just started work on its new Local Plan, there is the potential for any joint work/discussions to benefit both emerging plans.	Noted. No change needed. RBC is working closely with WBDC and other surrounding authorities to address these issues.
Caversham and District Residents' Association	4.2: Built and Natural Environment	CADRA is very pleased the Local Plan contains an expanded section on the built environment, which contains important policies to protect heritage assets in the town. We have very much welcomed the collaboration between Reading Borough Council, English Heritage and Community Groups, via the creation of the CAAC to address how the heritage of Reading can be protected.	Noted. No change needed.
Reading UK CIC	4.2: Built and Natural Environment	This policy fits well with our shorter term objectives of raising the profile of Reading as set out in the Reading economic development plan and the longer term vision 2050 to be a place that: <ul style="list-style-type: none"> · Has a real sense of place and identity · Is recognised for its heritage and natural assets 	Noted. No change needed.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.2.2	Rather than stating "(e.g. those with national and international designations)," we would like to see specific examples listed. We suggest the following language: "A vibrant historic environment, <i>allied to good new designs</i> , also contributes to town centre vitality, sustainable transport, residential development, good design , and the natural environment." We would like to see examples of good practice in Reading that represent heritage assets can be a positive force for regeneration.	No change proposed. There are too many specific examples to be listed here. Specific examples are included in the supporting text of EN1. It is unclear how the proposed change changes the meaning of the text. In an effort to keep the Local Plan concise and specific, it is not considered the appropriate place to share case studies.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.2.4	We suggest the following language at the end of this paragraph: " <i>The developer should refer to the Archaeological Advisory Services for the Borough as Archaeological Assessment Statements are required for all proposals involving the disturbance of ground within an Area of Archaeological Potential.</i> "	No change proposed. This is addressed in policy EN2, rather than here in the introductory text.
Historic England	Paragraph 4.2.1-4.2.11	We welcome these paragraphs as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change needed.
CAAC with comments and support of RCS, CADRA, BSANA,	Paragraph 4.2.9	The first sentence is in the wrong place. The paragraph should begin with "Nearly all of..." We want to see how heritage is being addressed and make the final sentence more positive. Suggested language is as follows: "Many local organisations (e.g. _____) are already working to <i>enhance</i> the view of Reading as a heritage destination."	Agree. Changes proposed.

BTCA, KCA and the Redlands NAG		Change the sequence of the sentence " <i>It is recognised that Reading has not always made the most of its significant heritage and this is being addressed.</i> "	
Chris Bedford	Paragraph 4.2.9	A new emphasis on conservation of heritage assets is welcome, but the suggestion in 4.2.9 that 'Many local organisations are already working to dispel the impression that Reading is not a heritage destination.' is surely an exaggeration, as is 'extensive heritage importance' in 2.1.6. The lack of controversy over the peculiar alterations at the grade II* house on Castle Hill or the demolition of the Zoar Chapel suggest public apathy.	Do not agree. No change proposed. Many local organisations such as the Conservation Area Advisory Committee (CAAC), Reading Civic Society (RCS), Caversham and District Residents Association (CADRA), Baker Street Area Neighbourhood Association (BSANA), the Bell Tower Community Association (BTCA), Katesgrove Community Association (KCA) and the Redlands NAG are working to improve our Conservation Areas, protect Listed Buildings and address Heritage-at-Risk, among other efforts.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.2.10	We suggest the following changes: " <i>Heritage assets may be formally designated, as being of national importance, or of local importance and may include listed buildings, conservation areas, scheduled ancient monuments, registered parks and gardens, industrial heritage sites, sites of archaeological interest and historic landscapes. The fact that an asset is not identified on a list does not mean it is not of historical significance.</i> "	Agree. Change proposed.
CAAC, RCS, CADRA, BSANA	Paragraph 4.2.11	We suggest the following changes: <ul style="list-style-type: none"> • Two Scheduled Ancient Monuments (Reading Abbey, <i>including the Civil War earthworks and the site of the Reading Gaol</i>) • <i>XX Buildings of Townscape Merit as identified in the 15 Conservation Area Appraisals</i> • <i>Industrial Heritage Sites</i> <p>We would like to see a map of the Abbey Quarter as this is the major heritage project of the moment.</p> <p>The number of Article 4 directions needs to be directed. 4.2.14 says there are 17, while the policy says there are 15. The Article 4 for Jesse Terrace has nothing to do with brickwork and is omitted entirely.</p>	Partly agreed. Change proposed. Most of the suggested changes should be made. With reference to Article 4 directions, there are 15 related to patterned brickwork, and a further two unrelated to heritage. Change proposed to the supporting text to CR15 to include reference to the Abbey Quarter map on the website in order to keep the Local Plan concise.
Chris Bedford	Figure 4.1	Figure 4.1 is informative but does not draw out what survives. The main elements are surely - the Abbey ruins and medieval churches	No change proposed. The purpose of the map is not to identify existing

		<ul style="list-style-type: none"> - the early 19th century terraces and villas along the roads east and west of the centre - the Town Hall and Forbury Gardens <p>and possibly</p> <ul style="list-style-type: none"> - the town's late 19th century school buildings and - the gaol <p>Meanwhile, nearly all the town's industrial and most of its non-conformist heritages have been obliterated. While the Abbey will always interest specialists, it is hard to see how this amounts to a heritage destination.</p>	<p>assets (which is done elsewhere), but to place the assets within a historic context. The NPPF states that "Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision." Thus, the fact that a heritage asset has not 'survived' does not make it less significant. The Abbey is considered to be one of Reading's most significant heritage assets. The Abbey Quarter project sets out how it will be transformed into a heritage destination.</p>
Evelyn Williams	Figure 4.1	Inclusion of industrial heritage sites on the heritage map is welcome. They should also be included in the text.	No change needed. Industrial heritage sites are emphasised in paragraph 4.2.6.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	EN1: Protection of the Historic Environment	<p>We suggest the following changes:</p> <ul style="list-style-type: none"> • "Listed Buildings (<i>on the national or Local Lists</i>); • [...] historic parks and gardens, locally listed assets, <i>industrial heritage and Buildings of Townscape Merit</i>. <p>[...] has no adverse impact on heritage assets and their settings. <i>Demolition of a nationally or locally listed heritage asset will not be permitted unless it has been proved that there is no viable use for the asset. The setting of heritage assets will be preserved and enhanced by the exercise of appropriate control over the design of new development in their vicinity, control over the use of adjacent land and control over the removal of trees or other landscape features which make a positive contribution to the area's character or appearance. [...] should be justified by a Heritage Statement, and should assess impacts and effects to an appropriate level of detail. The Council has the responsibility to monitor buildings and other heritage assets [...]."</i></p> <p>It would be helpful to add a sentence to the effect that new development should be appropriate in terms of scale, materials and location in heritage areas.</p> <p>Section 12, paragraph 130 of the NPPF should be added: "<i>Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.</i>"</p> <p>It needs to be clear throughout this section that Conservation Areas are heritage assets.</p>	<p>Partially agree. Listed buildings on the national list are referenced in the first bullet point, while locally listed assets are referenced in the third.</p> <p>It is considered that adding an additional classification for Buildings of Townscape Merit would confuse the policy, and they are part of and not separate to Conservation Areas. Picking specific elements out of Conservation Area Appraisals implies that they have a greater significance than other aspects in the CAA.</p> <p>Demolition is addressed by reference to the loss of an asset. Setting is addressed in the first paragraph. Control over the design of new development is addressed by policy EN6. It is assumed that a proper</p>

			<p>Heritage Statement will assess impacts and effects to an appropriate level of detail. It is unclear how the "The Council has the responsibility to monitor..." is different from "The Council will monitor..." Change proposed to change "buildings <i>or</i> other heritage assets" to "buildings <i>and</i> other heritage assets."</p> <p>Reference to scale, materials etc addressed by policy EN6.</p> <p>Reference to deliberate neglect should be added.</p> <p>Change proposed in paragraph 4.2.15 to clarify that CAs are heritage assets.</p>
Caversham and District Residents' Association	EN1: Protection of the Historic Environment	<p>It would be helpful to add a sentence to the effect that new development should be appropriate in terms of scale, materials and location in heritage areas. And to add this sentence from the NPPF (Section 12, para 130):</p> <p>"Where there is evidence of deliberate neglect or of damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision"</p>	Agree. Change proposed.
Historic England	EN1: Protection of the Historic Environment	We welcome Policy EN1, in principle, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment, and as a strategic policy to deliver the conservation and enhancement of the historic environment as required by the NPPF.	Noted. No change needed.
Historic England	EN1: Protection of the Historic Environment	We do not understand why the enhancement of historic features etc is caveated by "where appropriate". We consider that it would always be appropriate to enhance historic features etc where possible. Nor do we quite understand why scheduled monuments (which is the correct term rather than "Ancient Monuments") and historic parks and gardens are not listed individually but combined with non-designated heritage assets, when scheduled monuments and grade II* and grade I registered historic parks and gardens are in fact assets of the highest significance.	Agree. Changes proposed.
Historic England	EN1: Protection of the Historic Environment	We would prefer the third paragraph of the policy to read ".....has no adverse impact on the significance of heritage assets, including through development in their settings.", as it is the significance of heritage assets that the NPPF seeks to protect as well as the assets themselves. We would also welcome the inclusion of a reference in the third paragraph to clear and convincing justification usually being in the form of public benefits.	<p>Partly agreed. Change proposed.</p> <p>The reference to settings as worded could be taken to mean that development in the setting will be</p>

		In fact, the paragraph could helpfully be redrafted further as it currently states both that “Planning permission will only be granted where the new development.....has no adverse impact on heritage assets”, and “Any harm or loss to a heritage asset should require clear and convincing justification”, which suggests (quite rightly) that there may be circumstances where permission is granted for new development that does have an adverse impact on (the significance of) heritage assets. Whilst the intent could be considered laudable, a policy to only grant planning permission where there would be no adverse impacts on heritage assets could be considered to go beyond the NPPF.	inappropriate, and this is not the intent. It is agreed that the second paragraph is repetitive and also slightly contradictory, and deletion of the first sentence should address this.
Historic England	EN1: Protection of the Historic Environment	The NPPF requires local plans to include strategic policies to “deliver the conservation and enhancement of the historic environment”. We believe that “deliver” requires a proactive approach and we would like to see greater reference in Policy EN1 to the proactive measures that the Council will undertake to deliver the conservation and enhancement of the historic environment of the Borough e.g. a programme of conservation area appraisals and management plans, the completion of comprehensive list of locally important non-designated assets and a commitment to regular updating), a survey of grade II buildings to ascertain whether any are at risk of neglect, decay or other threats, the use of Article 4 Directions where appropriate within conservation areas etc.	Not agreed. Specific actions intended to deliver the conservation and enhancement of the historic environment are included in the fourth paragraph of EN1, as well as in EN2-EN6.
McKay Securities PLC	EN1: Protection of the Historic Environment	Parts of this policy conflict with one another and it does not provide coherent or consistent guidance. The second paragraph initially states that permission will only be granted where it has no adverse impact on heritage assets, yet later on the policy states that any harm or loss of heritage assets should require clear justification. These two points do not make sense in conjunction with one another and the policy should be clarified and amended accordingly. As presently drafted, the policy conflicts with and does not reflect government guidance contained in the NPPF and NPPG.	Agreed. Change proposed. It is agreed that the second paragraph is repetitive and also slightly contradictory, and deletion of the first sentence should address this.
Historic England	Paragraph 4.2.12	Whilst it is true that “Planning policy must therefore reconcile the need for development with the need to protect the natural and historic environment”, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF, planning policy should also seek opportunities for development to secure the conservation and enhancement of the historic environment, to better reveal its significance and to increase access to and enjoyment of that environment.	Agree. Change proposed.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.2.14	We urgently need a list of Article 4 directions made publicly accessible.	Noted. This issue is not related to the Local Plan, but we are working closely with the web team to improve the information available online.
Caversham and	Paragraph 4.2.14	We would welcome a more positive statement which recognises the role which Article 4	Agree. Change proposed to remove

District Residents' Association		directions can play in preventing the deterioration of heritage areas, and a clear intention by RBC to use them when appropriate.	reference to Council resources.
Historic England	Paragraph 4.2.14	We welcome the reference to the potential use of Article 4 Directions, although such Directions can be made anywhere where this is necessary to protect local amenity or the wellbeing of the area, not only in "areas where is a need to protect historic character".	Agree. Change proposed.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.2.15	Whilst we understand the resource issue, this is an internal management matter. For the external market it would surely be more appropriate to say "will be considered on a case by case basis and bearing in mind any resources impact." This statement needs to be more positive. Article 4 is the only policy tool to put a stop to destruction or disintegration of Conservation Areas and the planning department needs to explore Local Development Orders. CAAC wants to have a discussion about this.	Partially agree. Change proposed to remove reference to resources, although resources remain an important consideration. Additional language has been added to describe LDOs are a possible tool.
Caversham and District Residents' Association	Paragraph 4.2.15	We would prefer to see this linked to Para 4.2.19, which deals with the role of the Conservation Areas Action Committee (CAAC).	No change proposed. This paragraph is important, as it emphasises that Conservation Areas are assets deserving of a high level of protection.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.2.16	There is a distinction between "listed buildings" and "buildings listed by Historic England." This needs to be corrected.	Agree. Change proposed.
Caversham and District Residents' Association	Paragraph 4.2.16	CADRA would welcome a stronger policy statement which demonstrates the Councils commitment to addressing the issues which will protect vulnerable heritage assets. CADRA remains very concerned about the state of Chazey Farm barn in The Warren, a Grade 1 listed building. English Heritage currently assesses its condition as 'Very bad' and gives the building Priority Category, because it is 'at immediate risk of rapid deterioration or loss of fabric with no agreed solution'. CADRA would look for an intention from RBC to actively work towards protecting this valuable building.	Agree. Changes proposed. Additional language has been added to list assets at risk and illustrate the Council's intention to address these vulnerable heritage assets.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.2.17	This paragraph is really a "so what?" What will the Council do? Chazey Barn is a clear example of a building identified by Historic England and SAVE as being at risk and yet it seems impossible to take action. Perhaps this is unusual but where are the teeth? There is no clear intent here. What does "priority attention" mean? The CAAC would like to discuss further, using Chazey Barn as an example.	Agree. Changes proposed. Additional language has been added to list assets at risk and illustrate the Council's intention to address these vulnerable heritage assets. Chazey Barn is not owned by the Council, thus officers are working closely with its owners to

CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	EN2: Areas of Archaeological Significance	We suggest the following changes: "Applicants should identify and evaluate sites of archaeological significance <i>by consulting the Historic Environment Record. This will require an assessment of the archaeological impacts of development proposals to be submitted by applicants before the planning application is determined. Planning permission will not be granted in cases where the assessment of the archaeological impacts is inadequate. Development proposals which will have an adverse effect on scheduled monuments and other nationally important archaeological remains and their settings will not be allowed.</i> Where remains cannot be preserved 'in situ' remains should be properly excavated, investigated and recorded. <i>All reports will be written by a qualified heritage professional and should assess impacts and effects to an appropriate level of detail. This will require adequate provision for the identification, investigation, recording and publication of the archaeological resource. Where appropriate, Section 106/CIL agreements will be negotiated to protect, enhance and interpret archaeological remains.</i> " This is the wording used by Swindon Borough Council.	develop a plan for its restoration. Partially agree. Change proposed. Some aspects of the wording and structure should be amended, however. Reference to reports needing to be written by a qualified professional is more appropriately contained in the supporting text.
Chris Bedford	EN2: Areas of Archaeological Significance	Where buildings are demolished, above-ground evidence (which may be just as significant as the buried kind) tends to go unrecorded. Buildings in old centres have often been re-fronted, and unlisted buildings may contain significant medieval elements that should be considered for retention or recording. The Boars Head and the site now occupied by 'Coconut' on St Mary's Butts are examples (the latter having had a medieval roof with central filled truss). It should be made clear that EN2 applies to features of standing buildings. It would also be desirable to identify the town's surviving re-fronted buildings.	No change proposed. It is considered that above-ground heritage will be addressed by other heritage policies. Identifying the town's surviving re-fronted buildings is not the business of the Local Plan.
Historic England	EN2: Areas of Archaeological Significance	We welcome the recognition of areas of archaeological significance in a policy, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF, but as drafted the policy may not be considered to satisfy the requirements of paragraph 154. We would like to see a more detailed policy on archaeology that provides that clear indication of how a decision taker should react to a development proposal. This should include the conservation and enhancement of scheduled monuments and other nationally important archaeological sites and their settings; require that an appropriate assessment and evaluation is submitted as part of the planning application in areas of known or potential archaeological interest; contain a presumption in favour of the preservation, in situ, of archaeological remains or, in those cases where this is not justifiable or feasible, require provision to be made for excavation recording; and appropriate publication/curation of findings.	Agree. Change proposed. The policy should be extended to fully reflect the NPPF.
Historic England	Paragraph 4.2.17	We welcome this paragraph.	Noted. No change needed.
CAAC with comments and support of RCS, CADRA, BSANA,	EN3: Enhancement of Conservation Areas	We recommend the following changes: "The special interest, character <i>and architecture</i> of Conservation Areas will be conserved. Development proposals within Conservation Areas must <i>demonstrate</i> they make a positive contribution to local character and distinctiveness. <i>Partial or total demolition will not be permitted unless it has been proved that there is no viable use for</i>	Partially agree. Changes proposed to include reference to appraisals and management plans as material considerations and architecture. There

BTCA, KCA and the Redlands NAG		<p><i>the asset. Where a detailed Conservation Area Character Appraisal and Management Plan has been prepared for a particular conservation area, this will be a material consideration in determining applications for development within that Conservation Area. Positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas. This work requires consultation with the conservation team and Historic England, and may include:</i></p> <ul style="list-style-type: none"> • <i>Restoring original building features;</i> • <i>Removing inappropriate additions or alterations to buildings;</i> • <i>Improving signage and street furniture;</i> • <i>Restoring or re-establishing appropriate paving, railing or walls;</i> • <i>Reducing visual clutter caused by negative factors, such as poles and overhead wires;</i> • <i>Protecting and encouraging the maintenance of green spaces and important trees, particularly where they are intrinsic to the history and character of the area;</i> • <i>Improving or restoring green spaces, including front gardens, that are appropriate to the historic interest of a Conservation Area;</i> • <i>Sympathetic landscaping and planting;</i> • <i>Signage that reveals and promotes the Conservation Area and its boundaries;</i> • <i>Interpretation panels to inform the public of the area's historical significance.</i> <p>It should be mandatory to make Conservation Area Appraisals and Article 4s publicly accessible (for example, see Oxford Council).</p>	<p>is no need to re-order the bullet points, as they are not in priority order. Do not agree to include "Partial or total demolition will not be permitted unless there is no viable use" as this is covered by EN1. The Council does not have a conservation team, and it is not considered necessary to mention consultation with Historic England within the policy.</p> <p>Public accessibility of information on the website is not a Local Plan issue, but these concerns have been noted.</p>
Historic England	EN3: Enhancement of Conservation Areas	We welcome this policy as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF, but would prefer the opening sentence to read " conserved and enhanced". We would also welcome a requirement within the policy for development to have regard to the relevant Conservation Area Appraisal/Management Plan.	Agree. Change proposed.
Reading Friends of the Earth	EN3: Enhancement of Conservation Areas	There is potential conflict between the aims of this policy and the vital need for 'deep retrofit' of older properties to make them more energy-efficient - saving carbon emissions and reducing heating costs. 'Whole-street' retrofits - perhaps with financial support from the Council or heritage funding - may be a way forward. A particular issue is the need to provide on-street parking with charging points for electric vehicles. Another issue is the potential need to provide local waste collection and processing points.	Noted. No change needed. These concerns are addressed by policies CC5, EN15 and transport. Language encouraging a balance between sustainability and heritage has been added to paragraph 4.2.20.
Reading Urban Wildlife Group	EN3: Enhancement of Conservation Areas	Enhancement of conservation areas may not be in accordance with environmental objectives. Consideration is needed for new requirements such as charging points for electric vehicles	Noted. No change needed. These concerns are addressed by other policies.
CAAC with comments and support of RCS,	Paragraph 4.2.19	Should we say anything about updates and several being out of date? Information is not available online. The Council site is totally useless. The website provides the Conservation Area Appraisals in a single unwieldy document. The CAAC as part of its work to update the appraisals has split	Noted. No change proposed as this is not a Local Plan issue.

CADRA, BSANA, BTCA, KCA and the Redlands NAG		<p>this information so that they are readily accessible. In addition, single page summaries have been provided for all appraisals. Also, the map for the Russell St/Castle Hill CA is not provided on the Council website but has been provided by the CAAC. The website is: http://www.readingcivicsociety.org.uk/wordpress/?page_id=617 We understand that after the IT update a couple of years ago much useful information was lost from the Council website. Reading Civic Society website now provides useful info for owners in CAs. We have drawn from the following websites: Basingstoke Council, Bath and North East Somerset, Bath Preservation Trust. The website address is: http://www.readingcivicsociety.org.uk/wordpress/?page_id=644</p>	
Caversham and District Residents' Association	Paragraph 4.2.19	Should be expanded to explain that, subject to Public Consultation, the community-led conservation area appraisals are intended to be adopted as formal policy documents by RBC.	Partially agreed. Change proposed. Reference will be made to adopting the documents, although reference to CAAs as formal policy documents is not technically correct.
Historic England	Paragraph 4.2.19	We welcome this paragraph.	Noted. No change needed.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.2.20	Delete the negative introduction to this paragraph and delete "with limited technical support from officers."	Agree. Change proposed.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	EN4: Locally Important Heritage Assets	<p>We suggest the following changes:</p> <p>"Development proposals that affect locally important heritage assets will be expected to demonstrate that development conserves <i>architectural, archaeological, artistic or historical significance and its setting</i>, which may include the appearance, character and setting of the asset.</p> <p>Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset <i>only where the applicant successfully demonstrates</i> that the benefits of the development significantly outweigh the asset's significance. <i>It should be recognised that seeking the reuse of historic buildings, and where appropriate, their modification to reduce carbon emissions and secure sustainable development, without harming the significance of the heritage asset or its setting, mitigates the effects of climate change. Therefore, historic assets such as buildings should be re-used. Where it is accepted by the Local Planning Authority that viable use is not possible and therefore</i> retention is not important, recording of the heritage asset should be undertaken <i>by the applicant</i> and submitted alongside development proposals. Replacement buildings should draw upon heritage elements of the previous design, taking cues from the historic qualities that made the previous building</p>	<p>Partially agreed.</p> <p>Changes proposed to first paragraph with the exception of "artistic." Artistic merit is not a planning consideration.</p> <p>In an effort to keep the policy concise, the suggested additions concerning a balance between heritage and sustainability have been added within supporting text, rather than the policy itself. Other suggestions are considered to be repetitive or covered within other policies. It should be noted that EN1 also prescribes protection and enhancement for assets of the Local List.</p>

		significant <i>and the wider context of the area</i> . This may include appearance, scale and architectural quality. <i>The proposed new building/s should have a least as much architectural quality as what is lost.</i>	
Caversham and District Residents' Association	EN4: Locally Important Heritage Assets	We would welcome a scheme similar to that operated by Basingstoke and Deane Council, whereby parish councils and local heritage groups can nominate buildings to be listed as locally important. The Conservation Area Action Committee could play a valuable role in nominating appropriate buildings.	Noted. No change needed to the Local Plan, but the Council will keep the approach to managing the Local List under review.
Caversham and District Residents' Association	EN4: Locally Important Heritage Assets	Whilst they will not have statutory protection, there should be a clear policy intention that the qualities of buildings on the List will be fully taken into account when assessing any proposals for change or redevelopment which could affect them.	Agree. This has been addressed by the changes made as suggested by the CAAC. It should also be noted that EN1 provides protection for buildings on the Local List.
Caversham and District Residents' Association	EN4: Locally Important Heritage Assets	We would urge that the Council should require an applicant to justify why the existing building could not be retained or altered as part of development proposals, or demonstrate that the development would make a more positive contribution to the character and appearance of the area.	Partially agree. No change proposed, as this is stated in EN1 and applies to Locally Listed Buildings.
Jenny Cottee	EN4: Locally Important Heritage Assets	I welcome the section on recognising and valuing heritage but I find parts of the section on locally important assets confused and so too weak. In normal parlance I don't think 'historic heritage' solely means old or long-standing.	Noted. Changes made as a result of CAAC recommendations should clarify this, as well as the criteria for inclusion located in the appendix.
Historic England	EN4: Locally Important Heritage Assets	We welcome this policy, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change needed.
Evelyn Williams	EN4: Locally Important Heritage Assets	What will the process be to add to these sites should others be recommended for addition after the plan has been adopted?	No change to the Local Plan needed. Nomination to and maintenance of the Local List is not necessarily a Local Plan issue. The Council will keep the approach to managing the Local List under review.
Historic England	Paragraph 4.2.20	We welcome this paragraph, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change needed.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.2.21	Change "the List of Locally Important Heritage Buildings" to "a List of Locally Important Heritage Assets in order to be consistent with the heading.	Partially agreed. Change proposed.
	Paragraph 4.2.21	The current process for inclusion on the Local List is reactive, often in response to a plan to demolish a building which clearly is of Local Townscape Merit. As the Council gains no added teeth from the listing, this reactive process (while welcome) is not enough. Basingstoke Council have a process of submitting proposals for Local List which is clearly stated and involves many bodies and members of the public can nominate. http://www.basingstoke.gov.uk/HE02	While Local List processes could be improved, this is not necessarily the aim of a Local Plan policy. The Council will keep the approach to managing the Local List under review.
	Paragraph 4.2.21	Clear definition of Locally Listed Heritage Assets and Buildings of Townscape Merit must be	Agree. Clear definitions for each of

		defined. Appendix 2 must therefore be reviewed.	these terms should be added to the glossary.
	Paragraph 4.2.21	Suggest additional paragraph: "There are also XX Buildings of Townscape Merit identified in the Conservation Area Appraisals. As each Conservation Area Appraisal is reviewed and updated by the CAAC it is planned that the Buildings of Townscape Merit will be submitted for consideration to be added to the List of Locally Important Heritage Assets.	No change proposed. Adding Buildings of Townscape Merit to the Local List will not extend further protection than that already provided by Conservation Areas.
	Paragraph 4.2.21	Again, footnotes do not correctly state what is available on the website.	No change proposed. Footnotes refers to Historic England guidance, not the RBC website.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	EN5: Protection of Significant views with Heritage Interest	Correct the title of the <i>Alexandra Road</i> Conservation Area <i>in Redlands</i> .	Agree. Change proposed.
Chris Bedford	EN5: Protection of Significant Views with a Heritage Interest	EN5 attempts to cover three very different situations. One is to protect views out of conservation areas (a problem exemplified by the glass brick tower at the top of London Street). The view of Holy Tronity Church is cited, but the views needing protection are not just those ending in landmarks, and mapping a few of these is counter-productive. Other views identified are broad views across the Thames Valley, and it is unclear why and in what way these need protection. Third are point to point views such as that into the centre from Whitley Street (there may be another from a point on Elgar Road. The object there is to avoid tall or bulky structures which would dominate the view, and encourage appropriate design of flanking buildings. These views do need to be individually mapped.	No change proposed. The views included have been selected from a long list of views examined. It is considered that each of the views selected contains specific heritage significance. The purpose is specifically related to heritage, and view relating to landscape features or panoramic town centre views are not dealt with here.
Caversham and District Residents' Association	EN5: Protection of Significant Views with a Heritage Interest	We are very pleased that policies to protect significant views with heritage interest have been included in the Local Plan. We have welcomed the collaborative working between the planning officers and member of the CAAC and CADRA in formulating these policies.	Noted. No change needed.
Jenny Cottee	EN5: Protection of Significant Views with a Heritage Interest	I am pleased to see the view 1. from McIlroy Park across Thames Meadow towards the Chilterns escarpment included in the Plan. It's inclusion among the exemplars indicates and reflects the importance of continuity of landscape features to local people. There is no apparent particular historic significance to this area, apart from the very important fact that the view has been there for so many years and we know that generations past have looked across and enjoyed the view. It would be good to strengthen and clarify these sections. But I have not identified how to do this. Included in this wider understanding are local hedges (e.g. in Tilehurst bordering Armour Hill and Kentwood Hill) and the view across to the Chilterns from the Victoria Recreation Ground.	Noted. No change needed. A detailed analysis of each view will be included in the evidence base.

Historic England	EN5: Protection of Significant Views with a Heritage Interest	We welcome this policy as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF, but is there the evidence to support this policy? Are there any studies of important views into, out of, over and within Reading with a robust methodology or any rigorous assessment of the impact of tall buildings?	Agree. No change needed. A detailed analysis of each view will be included in the evidence base.
Veronica Leeke	EN5: Protection of Significant Views with a Heritage Interest	Can an additional map be drawn up alongside Figure 4.2 to show 'Significant Views with Green Space Interest', which may then be given protection? In particular, there are significant views both over the Thames and towards the AONBs (recognised in EN13).	No change needed. It is considered that views with landscape interest are protected through EN13.
McKay Securities PLC	EN5: Protection of Significant Views with a Heritage Interest	Figure 4.2 is unclear and does not help to establish the areas which should and should not take this policy into account. The arrows are narrow and do not indicate accurately which areas should accord/consider this policy. For example, the arrow for View 2 appears to point roughly towards an area of Central Reading which includes the taller buildings policy. It is not clear how these two policies would work in conjunction with one another.	Agreed. Change proposed. The map should be amended for clarity.
Reading Friends of the Earth	EN5: Protection of Significant Views with a Heritage Interest	Visual amenity is important - other aspects to consider include the view SW from The Cowsey, and the view downstream from Kennet Mouth.	This policy is intended to identify views of historic significance, not visual amenity. The view downstream from the Kennet Mouth is entirely within other authority areas
Reading Urban Wildlife Group	EN5: Protection of Significant Views with a Heritage Interest	We accept that Reading cannot control the developments in west Berkshire and Wokingham, but we think there should be three additional significant views where the borough should comment on development in other areas. (some of the "view" is in Reading) a. Prospect park south across to the wellingtonia avenue in Wokingham district b. from the ridge area west of the shinfield road (northcourt avenue, cressingham road down to shinfield) EAST over fobney area into the meadows c. From the ridge along cockney hill south over the meadows	No change proposed. It is not appropriate for the Local Plan to comment on views toward other Boroughs in which development is largely out of our control.
Historic England	Paragraph 4.2.21	We welcome this paragraph, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change needed.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.2.22	Add the following: <i>"New views may be opened up when existing buildings are demolished or trees are felled. If these views are of historical significance their preservation should be considered as part of any new development proposals."</i>	Partially agree. Change proposed to add this language to the supporting text.
CAAC with comments and support of RCS, CADRA, BSANA,	Paragraph 4.2.23	Clarify "significant <i>heritage</i> views in the Borough." Remove "that are not protected by other policies." The CAAC considers that heritage views should include those which are protected by other policies. Double protection of certain views would be a positive. We would like to discuss this further.	No change proposed. It is considered that double protection of views undermines the purpose of the policy.

BTCA, KCA and the Redlands NAG		CAAC would like some attention to be given to historic view of Reading from outside the Borough and historic views outside the Borough from within Reading insofar as development of the heritage asset or viewing place is under the control of the Borough. Discussion is ongoing that views inside the borough may not give sufficient recognition to important views OF the Borough.	Many long range views from outside of the Borough are considered in the strategy and inform the tall buildings policy (CR10). It is not clear which specific views are proposed to be considered.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	EN6: New Development in a Historic Context	Change "will be expected" to "will be <i>required</i> " and "Developers <i>should actively incorporate</i> heritage considerations in <i>shaping</i> the design of new development." The Bell Tower Community Association considers this to be an important policy for our area and others like it.	It is agreed that some amendment is necessary to the text, but alternative changes are proposed.
Historic England	EN6: New Development in a Historic Context	We welcome this policy as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change needed.
Mr J S Mangat	EN6: New Development in a Historic Context	It is not clear from the policy or the supporting text if the policy is to be applied to all new development including extensions or just new build.	No change proposed. This policy applies to all new development.
Mr J S Mangat	EN6: New Development in a Historic Context	The policy seems to be negatively prepared in that it seems to seek to wrap the historic environment in aspic and not allow for any innovation or modern interpretation. This is of particular concern to me given the introduction to East Reading 9.1.3. The negative connotation of EN6 is reinforced by paragraph 4.2.23 "The Council is committed to protecting and where appropriate enhancing, Reading's historic environment". If this sentence was modified to "The Council is committed where appropriate, to protecting and enhancing Reading's historic environment" the negativity associated with the policy could be removed.	No change proposed. The Council is committed to protect and enhance the historic environment. Supporting text has been added to paragraph 4.2.23 to clarify that innovation and modern interpretation can contribute to the historic environment.
Historic England	Paragraph 4.2.23	We welcome this paragraph, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change needed.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.2.24	Strike "where possible." We would like to discuss this. <i>Add "Good, modern design that is complimentary to the historic environment could be equally acceptable and might be preferable to 'pastiche.'"</i>	Agree. Changes proposed.
Caversham and District Residents' Association	Paragraph 4.2.24	We welcome the acknowledgement that pre-application discussions have a vital role to play in promoting and protecting historical character. We would welcome a statement which supports and advocates the involvement of interested community groups at a pre-application stage for all sites that are of community interest.	This is covered in the Council's Statement of Community Involvement, which advises pre-application consultation with the local community.

Bellway Homes Ltd	EN7: Local Green Space and Public Open Space	Support is expressed for this policy, including the protection of Battle Square Ref. EN7Wb as Local Green Space.	Noted. No change needed.
Barbara Garden	EN7: Local Green Space and Public Open Space	In a world full of industry and noise, I feel it is very important that all these spaces are maintained and protected and would like to see a stronger commitment to do so.	Noted. No change needed. It is considered that denying proposals which erode quality or result in loss is the highest level of protection possible.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	EN7: Local Green Space and Public Open Space	Why does Whiteknights Park not get a mention? Is it entirely within Wokingham?	The University of Reading Whiteknights Campus is addressed by policy ER2.
		What about the space in front of Yeomanry House?	The space in front of Yeomanry House is addressed by allocation WR3e which seeks to "avoid adverse effects on the wooded frontage to Castle Hill."
		Correct the spelling of Robert Hewett Recreation Ground in the table, as well as in the matrix.	Agree. Spelling has been corrected.
Veronica Leeke	EN7: Local Green Space and Public Open Space (and other open space policies)	I support the council's commitment to protecting biodiversity and to retaining and, where possible, adding to open green space, recognising their importance to residents within an urban environment	Noted. No change needed.
Bob O'Neill	EN7: Local Green Space and Public Open Space	Seeing that you are desperately trying to up your portfolio of open space, how come you have not included the park bench that has been meticulously reinstated on the site of the former Civic Centre. You also omit the two or more cemeteries which do provide repose and somewhere to go for a walk.	No change proposed. The site at the former Civic Centre is allocated for development (CR12e) and will include an improved area of public open space. Cemeteries have alternative statutory protection.
Bob O'Neill	EN7: Local Green Space and Public Open Space	The area just beside Caversham Bridge on the Reading side and nearest to Reading Bridge is also a tree covered area with a bench. This should be defined as are the other green spaces. Your map shows it in white. I have seen staff from Peter Brett sitting there at lunchtime.	No change proposed. It is considered that this site does not merit protection under EN7 and it nonetheless falls under policy EN8: Undesignated Open Space.
Reading Friends of the Earth	EN7: Local Green Space and Public Open Space	We support this policy in general. When open space may be lost or damaged it is important to aim for like-for-like replacement.	Noted. No change needed.
Sport England	EN7: Local Green Space and Public Open Space	Sport England welcomes the Council's inclusion of a number of playing fields as being identified as local green space (see paragraphs 76 and 77 of the NPPF. If any artificial pitches (with floodlighting and high fencing) are proposed at any of these locations it is important that the Council considers designating these in the plan to ensure that the principle of these developments in these locations are acceptable.	Noted. No change needed.

Thames Valley Berkshire LEP	EN7: Local Green Space and Public Open Space (and other open space policies)	Our ESIF Strategy includes a strong focus on Protecting the Environment.	Noted. No change needed.
Evelyn Williams	EN7: Local Green Space and Public Open Space	The late arrival of Oxford Road Community Garden as designated green space is noted. It is not on the Local Green Space Assessment Matrix. In the light of the above I would ask that RBC reconsider the possibility of including the following areas as local green space which were felt not to meet the criteria at the time of my comments during the New Local Plan Issues and Options consultation. <ul style="list-style-type: none"> • Ardler Road Allotments • Lower Southcote Allotments • Mockbeggar Allotments • New Christ Church School playing fields 	No change proposed. Oxford Road Community Garden has been added to the Local Green Space Matrix. Do not agree to designate the allotments. These are not of sufficient significance to be identified as Local Green Space, and fall under EN8.
Evelyn Williams	EN7: Local Green Space and Public Open Space	It should be noted that Katesgrove has only two areas of designated local green space: Waterloo Meadows and Long Barn Lane Recreation Ground. Looking at the matrix perhaps some of the churchyards e.g. St Giles and play areas e.g. St Giles' Close should have been included?	Do not agree. Smaller green spaces within the grounds of churches are protected under EN8 as undesignated open space, as well as St Giles' play areas.
Evelyn Williams	EN7Si: Waterloo Meadows	I was surprised to see that Waterloo Meadows only rated as local green space because of 'recreation'. I thought it merited at least a tick in the 'wildlife' box and it is at least as 'tranquil' as some of the other areas with a tick for 'tranquillity'.	Changes will be made to the assessment matrix.
Tilehurst Poor's Land Charity	EN7Wu: Victoria Recreation Ground and Kentwood Hill Allotments	Our clients support the retention of the allotments and recreation ground as local green space/public open space.	Noted. No change needed.
Tricia Appleton	EN7n: Mapledurham Playing Field	I strongly support any proposals to protect Reading's limited green space against further development and particularly support the designation of Mapledurham Playing Fields as Local Green Space. They are crying out for protection and for the enhancement of its recreational facilities. As well as providing regularly used playing fields, tennis courts, children's play area and picnic area, the site consists of lovely grassland, a small orchard and a wooded area. The playing fields are surrounded by houses and is used for various community events. The playing fields are tree lined which enhances their beauty. I see that the fields have not been designated as having beauty: I would disagree with this. The fields are a place of rare and great tranquillity when not being used for sports. They are an intrinsic part of the neighbourhood and an essential part of its character.	Noted. No change needed. Changes will be made to the assessment matrix.

		<p>The local community cares passionately about the playing fields, and has been, as you may know, been fundraising to try and reinstate the pavilion which has been allowed to fall into disrepair.</p> <p>I also understand that part of the site consists of an ancient boundary, dating from Anglo Saxon times and that Neolithic flints have been found on the site.</p> <p>The site has a number of football pitches, a basketball court and a tennis club. The fact that the site is not prone to flooding makes the pitches all the more attractive as a recreational facility. Due to the combination of field and woodland there is a diversity of wildlife, including bats, badgers and deer, kites and small mammals. A number of bat viewing walks have been held on the site. The site is also very popular with local dog walkers.</p>	
Steve Ayers	EN7n: Mapledurham Playing Field	Mapledurham Playing Fields should remain undeveloped. This green open space must remain for Sporting and recreational activities, as per the original intention of the Hewitt family who gave the land to the community. There is a discrepancy about the size of this land on page2 Local Green Space Assessment Matrix which shows just under 11 hectares, yet the land left in Trust was actually 25 hectares. There is also an inconsistency between the 2014 map and the new one in that a strip of land from Mapledurham Playing fields onto Chazey Rd has disappeared.	Noted. No change needed. The Local Plan identifies MPF as Local Green Space. 10.86 ha refers to the area selected for designation and has no relationship with the Trust Deed. The strip of land onto Chazey Road is simply an access route between houses and is not considered to be part of the Local Green Space.
Jane Bickerstaffe	EN7Nn: Mapledurham Playing Field	I strongly recommend that current green spaces in Reading are kept green. That includes Mapledurham Playing Fields which is currently under threat from an application from the Education Funding Authority to build a school, despite the fact that the land is held in Trust solely for sports and leisure purposes. Please ensure that the Trust is respected.	Noted. No change needed. The Local Plan identifies MPF as Local Green Space.
Julia Branson	EN7Nn: Mapledurham Playing Field	I support the building of the school on Mapledurum Playing Fields on the understanding that local residents concerns are taken into consideration, and above all that the site is made into a safe environment for the children. My initial concerns for the original site was because of the safety on the roads and playing on MPF. I therefore trust that children's safety is paramount thereby ensuring we have a great school for Caversham.	Noted. No change needed. The Local Plan identifies MPF as Local Green Space.
Hayley Brommell	EN7Nn: Mapledurham Playing Field	<p>Mapledurham Playing Fields is an outstanding green space serving the entire community in a multitude of ways related to recreation. The designated area is wrong- as the playing fields were gifted and it clearly states in the Trust Deed they are 25 acres - and this is over 11 hectares, not under as you have stated.</p> <p>In the Assessment Matrix you have not 'ticked' that it is a place of beauty, this is wrong, as there a numerous photos of the Playing Fields demonstrating what a beautiful area it is. The assessment matrix does not include how valuable this place is for leisure in Reading, the home of Caversham Trent's Football club with over 400 members. In addition, you have not ticked that the Playing fields are of historic significance. I do not agree with this.</p>	<p>Noted. No change needed. The Local Plan identifies MPF as Local Green Space. 10.86 ha refers to the area selected for designation and has no relationship with the Trust Deed.</p> <p>Changes will be made to the assessment matrix.</p>

Martin Brommell	EN7Nn: Mapledurham Playing Field	<p>I request that Mapledurham Playing Field remains classified as Local Green Space for recreation only. MPF can easily endure beyond the end of the plan period. It is in close proximity to the community it serves, holds particular significance for its recreational value, its tranquillity and its richness of wildlife and is very local in character and does not represent an extensive tract of land).</p> <p>Proposals exist, which you may be aware of, to make MPF the permanent location for the Heights School. This proposal would be in direct breach of the object of the Recreation Ground Charity 304328. If the trust was breached, it would expose the site to the risk of further development in the future. The wishes of Charles Hewett, when he generously gifted the land, was specifically that the land must be used for recreation only. This precludes education which would only benefit a small percentage of the overall community.</p> <p>Virtually every one of the factors listed in Table 2 would be adversely affected if MPF was developed for any purposes other than recreation.</p> <p>Local residents have currently lost the use of the pavilion at MPF which provided an important community hub. If a school replaced the pavilion, this would significantly impact a very large percentage of the trust beneficiaries. Until 2 years ago, when the pavilion was closed due to safety concerns, local residents of all age groups enjoyed unfettered access 7 days a week. They will lose such access to this important community hub if a school is built because they would not have similar access to the school due to school hours, including out of hours clubs, and because of the safety of primary school age children who could not mix with toddler groups, teenagers, senior citizens and all adult groups. This means that under the Equality Act 2010 (Section 149) large groups of the population such as the elderly, infants, teenagers and adults will be discriminated against by a very small percentage of the population (primary school children) who will benefit from a school.</p>	Noted. No change needed. The Local Plan identifies MPF as Local Green Space.
Shonagh Brunnen	EN7Nn: Mapledurham Playing Field	I object to the proposed siting of The Heights School because it will destroy 5 football pitches and make access to the tennis club difficult during the day and when events are taking place at the school. The Pavilion should be renovated as there are no other non-religious halls in the area. It was, and should be in the future, a valuable asset to the community.	Noted. No change needed. The Local Plan identifies MPF as Local Green Space.
Jacqueline Charles-Jones	EN7Nn: Mapledurham Playing Field	The Mapledurham Playing Fields and Pavillion should be left intact and as green space as was always intended. It is the duty of the planning office and the local councils to protect such space for now and for future generations.	Noted. No change needed. The Local Plan identifies MPF as Local Green Space.
Mark Corbett	EN7Nn: Mapledurham Playing Field	Please can you defend local green space from developers of whatever hue. In particular, this should include Mapledurham Playing Fields, which were given as playing fields and should be respected as such. They are needed now more than ever.	Noted. No change needed. The Local Plan identifies MPF as Local Green Space.
Barbara Garden	EN7Nn Mapledurham Playing Fields	I have a particular interest in Mapledurham Playing Fields, which you state is 10.86 hectares, when the original deeds state that it is 25 acres, or 11 hectares, as this is the area that I use the	No change proposed. 10.86 ha refers to the area selected for designation

		most.	and has no relationship with the Trust Deed.
Frances Hill	EN7Nn Mapledurham Playing Fields	Mapledurham Playing Fields should remain as it was intended - a green open space, left in Trust for use by all residents. It is wholly wrong to implement a land grab for a new school, so removing the space from the general public permanently. I note there is also a discrepancy between the 2014 map and the one you are currently using; a strip of land onto Chazey Road seems to have disappeared - an oversight?	No change needed. The Local Plan identifies MPF as Local Green Space. The Proposals Map shows that the strips of land on Chazey Road remain part of the space.
Paul and Leone Letchford	EN7Nn Mapledurham Playing Fields	We would like to register our strong support for Mapledurham Playing Fields to remain green open space - as it was always intended.	Noted. No change needed.
Elisa Miles	EN7Nn Mapledurham Playing Fields	Mapledurham Playing Fields is an outstanding green space serving the entire community in a multitude of ways related to recreation. The designated area is wrong- as the playing fields were gifted and it clearly states in the Trust Deed they are 25 acres - and this is over 11 hectares, not under as you have stated.	No change proposed. 10.86 ha refers to the area selected for designation and has no relationship with the Trust Deed. Changes will be made to the assessment matrix.
Alan and Pam Reynolds		In the Assessment Matrix you have not 'ticked' that it is a place of beauty, this is wrong, as there are numerous photos of the Playing Fields demonstrating what a beautiful area it is. In addition, you have not ticked that the Playing fields are of historic significance. I am afraid that again I will have to disagree. We have had numerous presentations and articles on the very subject of the history of the land- long before it became MPF.	
Joyce Parsons	EN7Nn Mapledurham Playing Fields	I strongly object to the proposal to build on this land which was left in trust for the purpose of recreation for the local people. The proposed school will take up a considerable proportion of the land and will, of course, require more as it expands so that the whole area will be built on in a few short years. There are not a lot of areas which we older people can reach and where we can walk in safety, nor where young people can play football and take the exercise they so badly need these days.	Noted. No change needed. The Local Plan identifies MPF as Local Green Space.
Michael Payne	EN7Nn Mapledurham Playing Fields	I am particularly keen that the Mapledurham Playing Fields remain as open green space, available for the recreational benefit of the residents of Reading and Mapledurham, as was originally intended. There should be no development whatsoever. It appears that there is a discrepancy between the 2014 map and the one currently being used, insofar as a strip of land onto Chazey Road seems to have disappeared.	No change needed. The Local Plan identifies MPF as Local Green Space. The Proposals Map shows that the strips of land on Chazey Road remain part of the space.
Niamh Sherwood	EN7Nn Mapledurham Playing Fields	I do not support any development on Mapledurham Playing Fields. It is the most wonderful space that is open to all to use 24 hours a day 365 days of the year. I am happy for Mapledurham Playing Fields to remain as green open space.	Noted. No change needed.
Anne and Derek White	EN7Nn Mapledurham Playing Fields	We wish all 25 acres of MPF to remain unbuilt on and continue in the intended use of playing fields and a recreational amenity for the residents of the local area and beyond. It is of unreplaceable value to many sports clubs and other users, of all ages.	No change proposed. 10.86 ha refers to the area selected for designation and has no relationship with the Trust Deed.
Therese Wicks	EN7Nn Mapledurham	I would like MPF to remain a green space as that was the original plan. I also believe that part of	No change needed. The Local Plan

	Playing Fields	the wooded area at Chazey Rd seems to have disappeared off the plan.	identifies MPF as Local Green Space. The Proposals Map shows that the strips of land on Chazey Road remain part of the space.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	EN8: Undesignated Open Space	We have concerns about EN8 and EN9 in relation to the setting of heritage assets and within or adjacent to Conservation Areas. We would like this to be strengthened in that aspect.	No change proposed to EN8 itself, but some language added to the supporting text in paragraph 4.2.31.
Reading Friends of the Earth	EN8: Undesignated Open Space	We support this policy in general. When open space may be lost or damaged it is important to aim for like-for-like replacement.	Noted. No change needed.
Reading Urban Wildlife Group	EN8: Undesignated Open Space	We think there is a mistake. In third sentence. It implies that you could swap an allotment for a sports facility	Agree. Change proposed. This should be clarified.
Sport England	EN8: Undesignated Open Space	Sport England is concerned that the list for EN7 may not include all playing fields in the Borough, as acknowledged in the Council's forthcoming playing pitch strategy. For example, there are also a number of school playing fields and sports facilities (e.g. artificial pitches) that whilst controlled by education authorities are used by the public and have not been included in this list. Sport England is concerned that Policy EN8 may not provide sufficient protection for these playing fields from school development or other types of development for example. Sport England therefore recommends that the plan includes a separate policy that will protect playing fields from development.	No change proposed. EN8 contains a quite clear statement about protection of undesignated open space unless adequate replacement can be made. It is not clear what such a dedicated policy for playing fields would add.
Bellway Homes Ltd	EN9: Provision of Open Space	It is considered this policy should more clearly set out what level of open space is required from developers on-site for new qualifying developments. The policy is worded such that new open space provision requirements are informed by the Open Spaces Strategy. The latest Open Space Strategy available on the Council's web-site is dated March 2007 and at over 10 years old is not considered sufficiently up to date to inform decisions now or in the future over the forthcoming plan period.	No change proposed. The Open Spaces Strategy will be updated to reflect changes since 2007, but the situation is not substantially different.
McKay Securities PLC	EN9: Provision of Open Space	The additional text box under policy EN9 titled "Provision of green space with development - overview of requirements" is unnecessarily confusing, it should either be incorporated into policy EN9 or simply be dealt with in the supporting policy text. In its current form, it is not clear whether it is a policy or a justification and what weight should be given to it.	Not agreed. No change proposed. It is not agreed that it is confusing, and it clearly states what it is intended to do.
McKay Securities PLC	EN9: Provision of Open Space & EN10: Access to Open Space	Policy EN9 and Policy EN10 conflict with one another. Policy EN9 states that new development should provide open space which should be useable parcels of land, should not be fragmented, be safely and easily accessible and not severed by any physical barrier, including a road. Policy EN10, by contrast, seeks developments to make provision for improved road and other crossings to open spaces (i.e. which is severed from the development). Whilst our client acknowledges that EN10 is referring to sites with relatively poor access to open space, policy EN9 does not	No change proposed. It is not agreed that there is a conflict. It is quite clear how they will operate. EN9 deals with new spaces, whilst EN10 recognises that there are some limitations with access to existing

		make allowances for this. Some forms of cross reference or clarity on how these policies will work in conjunction with one another is required.	spaces.
Natural England	EN9: Provision of Open Space	It is really important to specify "green" open space or you risk ending up with large paved areas with a token tree stuck in the middle.	No change proposed. It must be recognised that Reading is an urban Borough, and in some cases, particularly the town centre, paved open spaces will be appropriate.
Reading Friends of the Earth	EN9: Provision of Open Space	We support this policy in general. When open space may be lost or damaged it is important to aim for like-for-like replacement.	Noted. No change needed.
Sport England	EN9: Provision of Open Space	Sport England is concerned that it appears from recent planning application consultations that for some housing schemes, limited monies from new development in the Borough are being directed towards new sports and leisure facilities and the improvement of the open spaces (including playing fields) that will serve these developments. Sport England would like to see more allocations for sport and leisure facilities to be included within the development plan to support growth. The work on the Playing Pitch Strategy will help with this.	No change proposed. A number of sites have been allocated for sports and leisure provision, but allocations must be capable of delivery.
Natural England	Paragraph 4.2.33	Suggested change: "Qualitative improvements might include the provision of supporting amenities e.g. benches, refreshment facilities, green infrastructure etc." No one is going to want to sit on benches if there is no shade or a nice environment to look at and clean the air	Agree. Change proposed.
Natural England	Paragraph 4.2.36	Suggested change: <ul style="list-style-type: none"> • Links to public open space: these are fragmented, so that some public open space is not linked by pedestrian infrastructure to homes, and • Links between habitat areas and wildlife corridors that are incomplete." 	Agree. Change proposed
Reading Friends of the Earth	EN10: Access to Open Space	We support this policy in general. When open space may be lost or damaged it is important to aim for like-for-like replacement.	Noted. No change needed.
Sport England	EN10: Access to Open Space	Sport England supports the Council's intention to ensure that new developments have access to open space for physical activity.	Noted. No change needed.
Environment Agency	Paragraph 4.2.45	With regard to the last sentence, we agree that paths alongside watercourses do provide an opportunity to enhance the network of green links and corridors across the Borough, but would stress that this paragraph should include ecological enhancement such as the 10 metre ecological buffer zones.	No change proposed. The purpose of this section is not to repeat policy from elsewhere, and this is covered in EN11.
Eric Bowes	EN11: Waterspaces	I am a narrowboater who regularly uses the Kennet through Reading. I am interested in the bullet point 'good level access to the waterways for all people who want to use them.' The state of the Kennet and Avon Canal in Reading is dire. It is very difficult to find somewhere to stop. Both Banbury and Newbury have embraced the waterways for use by all. In Reading, there is nowhere to stop to shop and eat. The only moorings, especially near the prison loop, are congested with boats that have not moved for a long time. The Kennet and Avon is a resource that Reading should use to provide commercial and leisure benefits from the town. At the moment, it is one step away from being totally ignored by Reading.	No change proposed. Policy SR5 of the Draft Local Plan identifies opportunities for riverside recreation, which may include the provision of marinas.

Canal & River Trust	EN11: Waterspaces	<p>The Canal & River Trust welcome the provision of Policy EN11 Waterspaces but note that the policy states; “Development set at least ten metres back from the waterway wherever practicable to protect its biodiversity significance;”</p> <p>The Trust does not wish to see a blanket protection policy for land directly alongside the canal as this could perhaps prevent suitable and sensitive development. There are many areas where the active surveillance and would wish to see an active public realm at the waterside rather than a landscape buffer and there are often differences in how the offside and towpath side should sometimes be treated.</p>	<p>No change proposed. It is agreed that there is a delicate balance to strike between the public realm and ecological roles of the waterside, as evidenced by very different views on this matter by the EA/NE and the CRT. It is considered that the use of the wording ‘wherever practicable’ strikes the appropriate balance.</p>
Canal & River Trust	EN11: Waterspaces	<p>The following wording is based on a policy successfully used elsewhere in the Country and which now forms part of several adopted Core Strategies.</p> <p>“Development adjacent to, or in the vicinity of the Kennet & Avon Canal, will be expected to:</p> <ol style="list-style-type: none"> Be of a high quality design that integrates the canal into the development proposal in a way that treats the waterway as an area of usable space; Integrate the waterway, towing path and canal environment into the public realm in terms of the design and management of the development; Improve access to, along and from the waterway and improve the environmental quality of the waterway corridor; Optimise views of water and generate natural surveillance of water space through the siting, configuration and orientation of buildings, recognising that appropriate boundary treatment and access issues may differ between the towing path and offside of the canal, and; Improve the amenity of the canal. Development that would have an adverse impact on the amenity of the canal by virtue of noise, odour or visual impact will not be supported. <p>When improvements to the canal are required these will be delivered by the developer through the use of planning obligations or through the Community Infrastructure Levy.”</p>	<p>Noted. It is not considered appropriate to have a specific policy for the Kennet & Avon Canal, as it can be dealt with in an overall policy. Most of the elements of the wording suggested appears within the Waterspaces policy, although the policy should be amended to also highlight the importance of creating and enhancing views.</p>
Canal & River Trust	EN11: Waterspaces	<p>The Council may wish to consider a policy relating to residential boating and the location of marinas / mooring basins. The Canal & River Trust would welcome the opportunity to discuss this further and to suggest possible wording.</p>	<p>There is a policy in the South Reading section relating to leisure use of the Kennetside area, which identifies the potential for marinas. It is not considered that there is a particular need for an additional policy.</p>
TJ Cook	EN11: Waterspaces	<p>More investment should be put towards improving the recreation of all rivers going through the town, which allows people to enjoy on a daily basis of all ages and adds to the aesthetic beauty of the town. This is a very utilised resource with the council and its officers not having the imagination to see how it can be improved for its people.</p>	<p>No change proposed. It is considered that the principle of making the rivers central to enhancement of the town runs through the plan.</p>
Environment Agency	EN11: Waterspaces	<p>We are pleased to see that there is a policy concerning Reading Boroughs waterspaces.</p>	<p>Noted. No change needed.</p>

Environment Agency	EN11: Waterspaces	At the start of the first paragraph amend the wording to "All Reading's waterspaces will be protected and enhanced, so that they can continue to contribute..."	Partially agreed. Change proposed. Agreed that the policy can refer to enhancement, but it is not clear what the word 'all' adds.
Environment Agency	EN11: Waterspaces	With regard to the fourth bullet point, access to the waterways is important, but some areas of river bank should remain less disturbed in order to ensure quieter areas for wildlife. Zoning of these areas is important.	Agreed. Change proposed. The wording should be amended to reflect this careful balancing act.
Environment Agency	EN11: Waterspaces	Whilst we are pleased to note the inclusion of a buffer between development and watercourses, the fifth bullet point should be amended to read: "Development proposals adjacent to or containing a watercourse should provide or retain an undeveloped ecological buffer a minimum of 10 metres wide between the development and the top of the river bank, and should include a long term landscape and ecological management plan for this buffer. On some sites, it may be appropriate to provide a larger buffer"	There is a delicate balancing act to strike in Reading, particularly the centre where the water is a key part of the public realm, between public access to the water and the water's ecological role. We therefore need to ensure that wording is sufficiently flexible to strike this balance. However, reference to a long term landscape and ecological management plan should be made in supporting text,
Environment Agency	EN11: Waterspaces	In the sixth bullet point, insert 'and enhancing' between "protecting" and "habitats".	Agreed. Change proposed.
Environment Agency	EN11: Waterspaces	Additional bullet points should be included within this policy as follows: 'Planning permission will only be granted for development proposals which would not have an adverse impact on the functions and setting of any watercourse and its associated corridor.'; and 'Opportunities for deculverting of watercourses should be actively pursued.'	Agreed. Change proposed. The reference to there being no adverse impact should be incorporated in the initial paragraph. Reference should also be made to deculverting.
Environment Agency	EN11: Waterspaces	It should be pointed out in the supporting text of your local plan that development proposals affecting watercourses will also be considered by the Environment Agency under separate legislation.	Agreed. Change proposed. This should be added to the supporting text.
Historic England	EN11: Waterspaces	We welcome this policy, but would welcome the addition of a reference to historic significance in the second bullet point and waterways as important historic features in the third bullet point, both as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Agreed. Change proposed. The policy should incorporate these references.
Natural England	EN11: Waterspaces	Suggested change: "Reading's water spaces will be protected, so that they can continue to contribute to local and regional biodiversity and ecology, flood mitigation, local character and visual amenity, the provision of accessible leisure and recreational opportunities and, where appropriate, navigation"	Agreed. Change proposed. The policy should refer to flood mitigation.
Natural England	EN11: Waterspaces	The 10m set back is in legislation and an EA requirement. Remove "whenever practicable"	No change proposed. We have not

			been able to identify any legislation or EA requirements that specify a 10m set back in all circumstances.
Reading Friends of the Earth	EN11: Waterspaces	We support this policy in general. When open space may be lost or damaged it is important to aim for like-for-like replacement.	Noted. No change proposed.
Reading Urban Wildlife Group	EN11: Waterspaces	Development set at least ten metres back from the waterway is really not enough protection for biodiversity against dog walkers, cyclists etc etc.	There is a delicate balancing act to strike in Reading, particularly the centre where the water is a key part of the public realm, between public access to the water and the water's ecological role. We therefore need to ensure that wording is sufficiently flexible to strike this balance.
Reading Urban Wildlife Group	EN11: Waterspaces	We think there should be a presumption against development on the north bank of the thames, the south of the Holy brook west of the A33 and the west of the kennet past the Fobney intersection to provide a comprehensive wildlife corridor plus a flooding zone. These areas are far less developed than the other banks at present and form a natural barrier.	No change needed. Most of these areas are covered by biodiversity or landscape designations, and it is not considered that such a policy approach would be justified or necessary.
SGN plc	EN11: Waterspaces	<p>One criterion is "Good, level access to the waterways for all those who want to use them". Whilst the desire to improve the accessibility of waterside environments within Reading is supported in principle, it is considered that the wording of this criterion as currently drafted could leave room for confusion. It is presumed that the intention of this criterion is to ensure good, level access to waterside areas, rather than the waterways themselves, but this should be clarified in future iterations of the plan.</p> <p>Furthermore, the policy is also currently worded in a way that requires new development to comply with all of the criteria. The wording of this criterion should therefore also be amended to provide greater flexibility in the event that there are site-specific constraints that prevent level access in some areas. This could be achieved by adding the words "<i>wherever practicable</i>" at the end of the sentence, as per the criterion below it.</p>	Partially agreed. Change proposed. The criterion is intended to relate to the waterside rather than use of the waterway itself, so this should be clarified. It is agreed that 'wherever practicable' should be included in this criterion, but supporting text must clarify that this is very much an exception.
SGN plc	EN11: Waterspaces	One criterion is "Development set at least ten metres back from the waterway wherever practicable to protect its biodiversity significance". Whilst the flexibility in this criterion is supported, it is unclear what is meant by 'Development' in this instance. For instance, is this referring solely to buildings, or does it include hard landscaped areas or pedestrian footways such as the "good, level access to the waterways" required by the preceding criterion? This should be clarified in the next iteration of the plan, either in the policy itself or the supporting text.	Agreed. Change proposed. The supporting text should clarify what is meant by development in this instance.
University of Reading	EN11: Waterspaces	The University supports the inclusion of draft Policy EN11 to protect Reading's waterspaces. However, there appears an uncomfortable relationship between bullets 4 and 5 of the draft Policy. Bullet 4 requires that good, level access to the waterways for all those who want to use	Partially agreed. Change proposed. Wording should be amended within the fourth bullet point to reflect the

		<p>them be provided. However, bullet 5 then states that development within 10 metres of the waterway should be avoided. Clearly, where safe level access is to be provided to the waterway, this may involve a form of development. It is therefore recommended that to accommodate the intention of both draft bullets 4 and 5, bullet 5 be amended to read as follows:</p> <p>“Unless required for access to the waterway, development within 10 metres shall be avoided; where development is required for access to the waterway proposals shall be required to demonstrate that no adverse impact on the significance of biodiversity within the waterways would result”</p>	<p>careful balance between access and biodiversity, although the emphasis will be slightly different. Development should be clarified in the supporting text.</p>
Environment Agency	Paragraph 4.2.47	<p>This paragraph seeks to promote the active use of waterside environment. However we expect there to be a 10 metre buffer free from development from the top of the riverbanks. Opportunities for ecological enhancement on the Thames and Kennet should be sought, along with all other watercourses in the Borough.</p>	<p>There is a delicate balancing act to strike in Reading, particularly the centre where the water is a key part of the public realm, between public access to the water and the water’s ecological role. We therefore need to ensure that wording is sufficiently flexible to strike this balance.</p>
Environment Agency	Paragraph 4.2.48	<p>We agree that the Holy Brook has a unique character and historical links. While we agree with the aim of the second sentence, we would argue that ‘opening up’ the brook should include deculverting it to give an open channel through the town for ecological benefits. This can be done on a site by site basis as opportunities allow, but the long term aim should be to deculvert the entire length of this river. Other watercourses in the Borough include the Foudry Brook and its tributaries, Berry Brook, Christchurch Ditch, Vastern Ditch (which again should be targeted for deculverting), the watercourse at the base of the escarpment at The Warren and the network of watercourses and ditches on the Kennet floodplain.</p>	<p>Agreed. Change proposed. The supporting text should be amended to highlight the potential for deculverting.</p>
Environment Agency	Paragraph 4.2.51	<p>With regard to the Thames Parks Plan, more needs to be done to enhance the ecological value of these parks adjacent to the watercourse. There are major opportunities to do this in these areas which are not currently being realised. Two further supporting paragraphs should be added as follows:</p> <p>“The 10 metre minimum ecological buffer adjacent to the watercourses should be maintained as a natural or semi-natural habitat free from built development, parking areas, private gardens and formal landscaping. Additionally, where a watercourse runs through a proposed development, a buffer shall be provided on both banks.”; and</p> <p>“Where barriers to fish are present in a watercourse adjacent to development proposals, the design should include measures to allow for the natural movement of fish within the watercourse.”</p>	<p>Agreed. Change proposed. This wording should largely be incorporated into the supporting text.</p>
Natural England	Paragraph 4.2.52	<p>There is also a management plan for the River Kennet in terms of canals and marinas etc.</p>	<p>We have not been able to identify this plan.</p>

Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust	EN12: Biodiversity and the Green Network	<p>We welcome the updated wording of Policy EN12. However where reference is made in the final paragraph of the policy to using a biodiversity metric to calculate provision of off-site compensation, BBOWT would urge that the use of a biodiversity metric is required for every development. This has practical benefit; all development is required to achieve net gain in biodiversity under the NPPF (paragraphs 9, 109, 118 and 152) and section 40 of the NERC Act and requiring all developments to quantitatively assess their biodiversity impact through the use of a biodiversity metric based on the Defra guidance is the most appropriate and simplest way Reading Borough can demonstrate that net gains are being delivered.</p> <p>In order to consistently assess the biodiversity impact of development it is also important that a standardised, accepted form of ecological information is provided with planning applications as per the NPPF (paragraph 165) and ODPM circular 06/2005 (paragraph 99). To ensure this, all ecological information submitted with planning applications should be presented in accordance with the British Standard on planning and biodiversity, BS42020 (BSI, 2013).</p> <p>We recommend that Policy EN12 contains a dedicated point worded as follows: “• All development applications are required to demonstrate a net gain in biodiversity in a quantifiable way using a biodiversity metric based on that described in DEFRA’s Biodiversity Offsetting guidance. Ecological information supplied should be in accordance with BS42020.”</p>	Partially agreed. Change proposed. The DEFRA Biodiversity Offsetting guidance should be referred to in the supporting text, as should BS42020. However, it is considered that this is too much detail to include in what is already a lengthy policy.
Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust	EN12: Biodiversity and the Green Network	<p>There appears to be no mention in the Draft Local Plan as it stands, of improving biodiversity provision within built development. There is a clear requirement in the NPPF (paragraph 118) for planning authorities to take opportunities to incorporate biodiversity in and around developments. Given that the benefits of integrating biodiversity into built developments deliver multiple functional and social benefits to people (i.e. ecosystem services, such as reducing air pollution, surface water runoff, flood risk and the urban heat island effect, and improvements to human health and wellbeing), the emphasis in the Draft Local Plan should be on achieving these multi-functional benefits, not exclusively benefits to wildlife. The issue of biodiversity being integrated into built development is sufficiently broad and important to the development outlook for the Borough that we recommend a specific section is needed in the Draft Local Plan.</p> <p>Table 1 (see full response) provides a recommended list of contents for a section on biodiversity in built development. We recommend that Policy EN12 contains the following dedicated point worded as follows: • “Development proposals should be designed to maximise biodiversity by conserving, enhancing or extending existing resources or creating new areas or features. Examples of what would be expected are set out below.”</p>	No change proposed. The policy does talk about enhancing biodiversity provision wherever possible within built development, and the plan generally talks about the multi-functional role of green space, watercourses etc. It is not therefore considered that any additional point is needed. In terms of the specific contents of the table, this is much too detailed for inclusion on the Local Plan. If considered necessary, it would be more appropriate for some form of supplementary guidance.
Canal & River Trust	EN12: Biodiversity and the Green Network	We welcome Policy EN12.	Noted. No change proposed.
Environment	EN12: Biodiversity	In general we are pleased with this policy about biodiversity and green networks	Noted. No change proposed.

Agency	and the Green Network		
Environment Agency	EN12: Biodiversity and the Green Network	In part a), in the first bullet point, insert 'all' to read "...and the River Thames and all its tributaries.."	Agreed. Change proposed.
Environment Agency	EN12: Biodiversity and the Green Network	In part b), in the first and second bullet points, omit "where practicable". Otherwise this weakens the strength of this policy.	No change proposed. There does need to be a degree of flexibility in how the overall policy is achieved. In the first bullet point, it may not always be possible to incorporate biodiversity features within a development, and it may be more appropriate to ensure some separation - this will depend on the nature of the development and the feature.
Environment Agency	EN12: Biodiversity and the Green Network	An additional paragraph should be added to the policy to make clear that in providing off-site compensation, one habitat type should not be replaced with another and that the replacement habitat shall be established prior to the development taking place. For example a long-term landscape and ecological management plan should be agreed in writing by the LPA.	Agreed. Change proposed. This should be referred to in the last paragraph rather than including a separate paragraph.
Natural England	EN12: Biodiversity and the Green Network	Fantastic	Noted. No change proposed.
Bob O'Neill	EN12: Biodiversity and the Green Network	Most railway line embankments are areas of biodiversity. On the Napier Road area you highlight this but don't elsewhere where there is similar. (noting between the Cow lane Bridges etc.)	No change proposed. Virtually all rail corridors within the urban area are identified as part of the Green Network. The exception is through the centre, where movement would be interrupted by the station.
Reading Friends of the Earth	EN12: Biodiversity and the Green Network	We support this policy.	Noted. No change proposed.
Reading Friends of the Earth	EN12: Biodiversity and the Green Network	Should specifically reference the 'green network'/'wildlife corridor' potential of the riverbanks, railways, and major road verges.	Agreed. Change proposed. These elements should be referred to in the supporting text.
Reading Urban Wildlife Group	EN12: Biodiversity and the Green Network	Para (b) we would like you to omit "wherever possible" as you already have a compensation scheme in the policy where they cannot achieve it on site	No change proposed. The "wherever possible" refers to a net gain of biodiversity, not to loss. Therefore, compensation will not necessarily achieve net gain.

Reading Urban Wildlife Group	EN12: Biodiversity and the Green Network	We would like to see a supplementary planning guide for developers on ecological enhancements and guidance for locations	No change proposed. A supplementary planning document is for consideration outside the Local Plan process.
SGN plc	EN12: Biodiversity and the Green Network	The first part of this policy states that the key elements of the Green Network are identified on the Proposals Map. This is correct, however none of the 'key elements' cited in Policy EN12 actually refer to Policy EN12 itself in the Proposals Map Key. For instance, in the Proposals Map Key, 'Area of identified biodiversity interest' refers to Policy EN7 only. For clarity, relevant features identified in the Proposals Map Key should also refer to Policy EN12.	Agreed. This was an error, and the reference should be changed to EN12.
SGN plc	EN12: Biodiversity and the Green Network	The flexibility that is built into the policy wording is supported.	Noted. No change proposed.
Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust	Paragraph 4.2.55	Reference is made to the Berkshire Nature Conservation Forum website which is now defunct. Biodiversity Opportunity Areas can currently instead be viewed on the website of the Berkshire Local Nature Partnership http://berkshirelnp.org/index.php/what-we-do/strategy/biodiversity-opportunity-areas .	Agreed. Change proposed. The reference should be updated.
Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust	Paragraph 4.2.58	We would welcome the opportunity to review the Green Network report which would appear to be a useful supplementary document for this Draft Local Plan. We would welcome its inclusion (or at least the inclusion of a summary map) in the revised Draft Local Plan.	No change proposed. The evidence will be published separately, but it is not considered appropriate to incorporate it into the document.
Environment Agency	Paragraph 4.2.59	We support the wording of this paragraph.	Noted. No change proposed.
Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust	Paragraph 4.2.61	We welcome the requirement for development to demonstrate that biodiversity features will be effectively managed and maintained to a high standard. We recommend it be clarified that management and maintenance of such features be ensured for the long term, to enable a net gain legacy and genuinely sustainable development not just in the short term but over the whole lifespan of the development in compliance with the NPPF (paragraph 58).	Agreed. Change proposed. This should refer to long term management.
Environment Agency	Paragraph 4.2.61	At the end of the last sentence in this paragraph, please add the following wording: 'through the mechanism of landscape and ecological management plans agreed in writing by the LPA.'	Agreed. Change proposed. This should be added.
Historic England	EN13: Major Landscape Features and Areas of Outstanding Natural Beauty	We welcome this policy, but if none of Reading Borough falls within an AONB, we wonder why the policy refers to development within an AONB?	Agreed. Change proposed. Reference to development within an AONB should be deleted.
West Berkshire District Council	EN13: Major Landscape Features and Areas of Outstanding Natural Beauty	The North Wessex Downs AONB at its closest point lies 200m west of Reading Borough at Tilehurst in West Berkshire. West Berkshire District Council welcomes the fact that the strategy for West Reading and Tilehurst identifies that areas of importance, such as the North Wessex Downs AONB, will be preserved, and that there is a policy (EN13) which has regard to major landscape features and AONBs.	Noted. No change proposed.

CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	EN14: Trees, Hedges and Woodlands	What is 'importance' and who defines it? We would like importance to be defined.	No change proposed. Important trees will need to be defined on a case by case basis, as it is not possible to set out hard and fast definitions.
Caversham and District Residents' Association	EN14: Trees, Hedges and Woodlands	Many of the fine mature trees in which contribute to the character of Caversham were planted in Edwardian times and some will be nearing the end of their natural life in the coming decades. To preserve the leafy character of the area which is so much valued by residents it will be important to plan for succession planting. We would welcome a statement in the Local Plan which advocates and supports the importance of planning for succession planting.	Agreed. Change proposed. The Tree Strategy refers to succession planting, and this should be referred to in the policy.
Veronica Leeke	EN14: Trees, Hedges and Woodlands	Can the statement that 'Reading's vegetation cover will be extended' also make mention of wildflower meadows where appropriate, being beneficial to both the biodiversity and to food production, since they encourage bees and pollinating insects?	No change proposed. This policy relates to trees, hedges and woodlands. Other forms of habitat such as wildflower meadows are covered more by EN12, and are one of a number of different types of important habitat that fall within the policy.
Reading Urban Wildlife Group	EN14: Trees, Hedges and Woodlands	The policy does not emphasise the need to retain trees on development sites wherever possible or put in sufficient protection for the roots of trees being retained. Paragraph 1 talks of protection for "important" trees and this word is used in subsequent paragraphs. There does not appear to be any definition of "important" and therefore no easy way for the council to defend this policy if the developer wants to flatten the site. Do you need to create a plan of important trees and woodlands in the Borough whose retention is required unless there are overwhelming reasons against?	Partially agreed. Change proposed. The policy should cover retention of trees. However, important trees will need to be defined on a case by case basis, as it is not possible to set out hard and fast definitions. Creating a plan of all important trees and woodlands would duplicate the TPO process.
Reading Urban Wildlife Group	EN14: Trees, Hedges and Woodlands	We would like to see a maintenance clause for new planting of individual or site trees as well as the extension of woodland (para 4.2.89). we suggest that the requirement for maintenance is added to the second paragraph of this policy	Agreed. Change proposed. The policy should refer to adequate maintenance arrangements.
Reading Urban Wildlife Group	EN14: Trees, Hedges and Woodlands	Finally, we would like to see a paragraph in the local plan outlining the requirements for management of onsite trees during construction and demolition. This to include not storing materials/equipment under the tree canopy and protecting the trunk and the area under the canopy from vehicles and machinery. The requirement for larger excavations to install water tanks for grey water recycling and for rainwater harvesting could have an additional adverse effect on mature trees as it will artificially lower the water table during construction.	Partially agreed. Change proposed. The supporting text should be amended to deal with management during construction. EN18 should refer to the effect on trees of water table changes.
University of	EN14: Trees,	The University supports the inclusion of Policy EN14 but would recommend an improvement to	No change proposed. The policy

Reading	Hedges and Woodlands	the second paragraph as stated below: "New development shall make provision, where appropriate and justified, for tree planting within the application site ..."	statement is strongly that all development will make provision for tree planting, to achieve the important aims already set out. This change would water the policy approach down.
John Wilkins	EN14: Trees, Hedges and Woodlands	I note comments on tree planting and strongly support such planting as part of developments, but I hope that such planting will be mandatory and enforced. Past experience suggests that developers get away with too much.	Noted. Tree planting secured through the planning permission should be capable of being enforced.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.2.67	Please add the following: <i>"The Council's Planning Section are able to protect trees of amenity value by way of a Tree Preservation Order (TPO) when specimen trees are under threat of being subjected to inappropriate work, damage and felling. Any tree or a group of trees covered by a TPO can be found in the street index of TPO's and on the Council's website."</i>	Partially agreed. Change proposed. The wording proposed is slightly different.
Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust	EN15: Air Quality	Oxides of nitrogen, ground level ozone and sulphur dioxide are all known to have adverse impacts on biodiversity. Oxides of nitrogen in particular are associated with road transport emissions. The wording of Policy EN15 should reflect the potential for harm to biodiversity as a result of nearby developments likely to generate an increase in air pollution. We recommend the following wording for a Policy point conveying this: • "Air quality assessments will be required for development proposals likely to have a significant impact on biodiversity by generating an increase in air pollution."	Partially agreed. Change proposed. It is agreed that poor air quality can affect biodiversity, but the policy talks about worsening air quality in general, so already covers this matter. However, it is considered that the supporting text can be amended to highlight that biodiversity is a sensitive receptor.
Environmental Protection (Reading Borough Council)	EN15: Air Quality	Examples of Supplementary Planning Documents for Air Quality are provided. Due to the cumulative effect development has on Reading's Air Quality the EP team would strongly recommend including measures such as these to include the adoption of an agreed protocol to control emissions from construction sites within the New Local Plan for Reading.	Agreed. Change proposed. The supporting text should refer to the possibility of a SPD as the matter develops.
Veronica Leeke	EN15: Air Quality	It is vital that RBC robustly objects to any neighbouring council allowing new development that would be detrimental to the air quality within Reading Borough	Noted. No change needed.
Reading Friends of the Earth	EN15: Air Quality	Note this appears to relate to outdoor air quality. This or a separate Policy should address choices of building materials and ventilation design to address indoor air quality.	No change proposed. Where development is proposed that would affect air quality, planning can only focus on outdoor air quality. Where development is proposed within areas of poorer air quality, the policy requires that effects are mitigated

			through design. It will be for applicants to find solutions (and these may change significantly over the plan period) and demonstrate how they comply with this requirement.
Reading Friends of the Earth	EN15: Air Quality	Note this appears to relate to routine exposures - it does not distinguish between short-term exposures (e.g. during construction works) and long-term exposure (i.e. during normal on-going usage). Special measures should be called for during exceptional periods.	No change proposed. It is considered that a simple, clear policy statement is required which applies to both long-term and short-term.
Reading Friends of the Earth	EN15: Air Quality	Need to be aware that the present standards do not represent 'safe' levels of pollutants and standards are likely to be tightened over the course of the Plan which should call for a precautionary approach.	Agreed. Change proposed. Supporting text should note that there is no such thing as 'safe' levels.
Reading Friends of the Earth	EN15: Air Quality	The effect of micro-particles - PM2.5 - should be considered.	Agreed. Change proposed. The supporting text should reference PM2.5s and the national standard.
Reading Urban Wildlife Group			
Reading Friends of the Earth	EN15: Air Quality	Not clear how a detrimental effect can be 'mitigated'	There are a variety of ways that effects can be mitigated, through measures to address travel choices, or through design of developments.
Reading Friends of the Earth	EN15: Air Quality	The Policy says development should not be permitted if it 'would significantly worsen air quality'. This is too lenient and open to debate. Policy should aim for 'Clean Air Everywhere'.	Partially agreed. Change proposed. It is considered that the word 'significantly' is not consistent with the main policy statement and should be deleted. However, an aim of 'clean air' is not a viable development management policy statement.
Reading Friends of the Earth	EN15: Air Quality	'local worsening in air quality' should only be allowed if the predicted levels are substantially below national and WHO target levels.	Partially agreed. Change proposed. The policy should state that where a very localised worsening of air quality happens, it should still not detrimentally affect health or the environment.
Reading Urban Wildlife Group	EN15: Air Quality	The policy para(i) bullet point three should have an absolute base level so that local worsening in air quality cannot take this below WHO levels no matter how much improvement is seen elsewhere	Partially agreed. Change proposed. An absolute base level is not proposed, but the policy should recognise that local worsening should not affect human health or the environment.
Reading Urban	EN15: Air Quality	This whole section refers to external air quality, primarily related to traffic. It needs a policy	No change proposed. Where

Wildlife Group		concerning building materials and building design to reduce indoor air pollution (or this should be included in c.c.2 or C.C.3. there is growing awareness of the impact of indoor air pollution since people spend a large proportion of their lives indoors. Some key issues are how energy efficiency schemes can lead to reduced ventilation, build up of water vapour in the home and hence increase in fungal spores. We think that the new development designs (and retrofits) should identify potential indoor pollution issues and mitigation. For example, we would expect all new housing built to zero carbon standards with draught-free building design to have some type of positive ventilation with heat exchange to remove excess water vapour from the dwellings.	development is proposed that would affect air quality, planning can only focus on outdoor air quality. Where development is proposed within areas of poorer air quality, the policy requires that effects are mitigated through design. It will be for applicants to find solutions (and these may change significantly over the plan period) and demonstrate how they comply with this requirement.
Reading Urban Wildlife Group	EN15: Air Quality	We suggest that the design of electric circuits and circuit board locations in all new development in AQMA (or in general) include the potential to connect easily a charging point for electric vehicles in the future	Partially agreed. Change proposed. Proposals for providing for electric vehicle charging should be included within the parking policy TRN5.
Reading Urban Wildlife Group	EN15: Air Quality	We would like new developments to include intelligent traffic lighting and roads designed so that traffic lights can be turned off at night to reduce idling.	No change proposed. The design of traffic lighting is best covered elsewhere.
Reading Urban Wildlife Group	Paragraph 4.2.76	We suggest that green walls for high rise areas are included in the mitigation options in 4.2.76	Agreed. Change proposed. This can be added.
Environment Agency	EN16: Pollution and Water Resources	We are pleased that the text of this policy to protect water quality covers both groundwater and surface water.	Noted. No change needed.
Environment Agency	EN16: Pollution and Water Resources	We recommend that there is more focus in your draft policy on compliance with the water framework directive's 'no deterioration' and getting to 'good' objectives. The plan needs to comply with the key objectives of the directive which are to ensure growth does not cause a deterioration in the overall status of the receiving water bodies and that growth should not prevent good status or alternative objective being achieved.	Agreed. Change proposed. The policy should refer to no deterioration rather than preserving water quality, and the supporting text should reference the aim of achieving good status.
Environment Agency	EN16: Pollution and Water Resources	This policy will benefit from a clear stance on the need for the required sewer infrastructure to be in place prior to the occupation of development. It is vital that communication occurs at the earliest possible stage between the Council and Sewer Undertaker to ensure infrastructure capacity is available and implemented through a phasing programme mirroring that of your proposed development growth.	Agreed. Change proposed. The policy should clarify that infrastructure should be in place prior to occupation. Communication between the Council and Thames Water has been taking place on development levels.
Environment Agency	EN16: Pollution and Water Resources	We recommended that the Council consider embedding a development management policy within your Local Plan to require that developers provide evidence to you that they have consulted with the sewer undertaker regarding wastewater treatment capacity, and the outcome of this consultation, prior to the granting of planning permission. You should consider the response from the sewer undertaker when deciding if the expected timeframe for the development site in question is appropriate.	Partially agreed. Change proposed. It is agreed that the policy should be amended to ensure that infrastructure is in place prior to occupation. There should be a new paragraph in the supporting text to clarify the

			information requirements at application stage. It is not considered that this needs to be a separate policy.
Environment Agency	EN16: Pollution and Water Resources	Please note, we will only agree to the use of private sewage disposal facilities within publicly sewered areas if the applicant can demonstrate that the additional cost of connecting to sewer would be unreasonable, connection is not practically feasible or the proposed private sewerage system would provide additional environmental benefits that would outweigh the potential environmental risks. Accordingly, we will not permit a discharge to controlled waters from a proposed private sewage treatment facility where it appears to us that it may be reasonable to connect to public sewer and the applicant has not demonstrated otherwise.	Agreed. Change proposed. This information will be added to the supporting text.
Environment Agency	EN16: Pollution and Water Resources	Within Policy EN16 and in the wording of paragraph 4.1.82 it suggests protecting 'sensitive developments' from the effects of pollution, but they do not mention 'sensitive receptors' e.g. protected areas such as source protection zones or groundwater aquifers. Please can you revise the wording to include this?	Agreed. Change proposed. This should be referred to in the first paragraph of the policy.
Environment Agency	EN16: Pollution and Water Resources	In policy EN16 we are pleased to see your intention that development will only be permitted where sewage and waste water treatment infrastructure are adequate to support the proposed development.	Noted. No change proposed.
Environment Agency	EN16: Pollution and Water Resources	Policy EN16 and paragraphs 4.2.84 and 4.2.92 say similar things but paragraphs 4.2.84 and 4.9.92 are more detailed about requirements for contaminated sites. If you make reference to these items in Policy EN16 then this would cross reference the details and requirements for developments. We recommend that you include something along the lines of the following text with policy EN16 to strengthen the wording: "Applicants must provide an appropriate level of site investigation information to demonstrate that the risks from contamination can be appropriately managed or remediated."	Partially agreed. Change proposed. The supporting text provides detail on how the policy statements will be implemented. It is not appropriate to repeat this in the policy. However, there should be small amendments to ensure that it 'is' demonstrated rather than 'can be' demonstrated.
Environment Agency	EN16: Pollution and Water Resources	There is no reference in policy EN16 about Source Protection Zones (except under SUDS in paragraph 4.2.92). The sensitive receptors such as the source protection zones should be included in this policy. Some developments may not be suitable within a Source Protection Zone 1. Please see and use the guidance for the protection of groundwater and the prevention of pollution of groundwater.	Agreed. Change proposed. The policy should be amended to refer to sensitive receptors, and the supporting text should clarify that this includes source protection zones.
Environment Agency	EN16: Pollution and Water Resources	Policy EN16 states 'so that it is suitable for the proposed end use and will not impact on the groundwater environment'. We strongly recommend adding the following text after the words 'groundwater environment' 'during demolition and construction phases as well as during the future use of the site.' This captures the protection of groundwater quality during the demolition phases of the development and during the construction phases of the development as well as the end use.	Agreed. Change proposed. This wording should be added.
Environment Agency	EN16: Pollution and Water Resources	We recommend that you include wording in this policy about dealing with unsuspected contamination on sites where there is no contaminative previous use recognised at the	No change proposed. Policies should be capable of implementation. Should

		application stage. If any unsuspected contamination is found during investigations or during the construction of a new development for example, then this policy will make sure that this contamination is dealt with. This should help to prevent contamination of source protection zones or groundwater aquifers.	unsuspected contamination arise after the application stage, the Council will not be able to control this through planning powers.
Environment Agency	EN16: Pollution and Water Resources	In EN16 it says "Development will only be permitted on land affected by contamination where it can be demonstrated that the contamination can be satisfactorily remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment." Please can you clarify whether you are saying in this part of policy EN16 that planning permission will not be granted until the applicant has submitted and had approved a desk-top study, site investigation, remediation strategy and verification report?	Agreed. Change proposed. The supporting text should be amended to clarify that permission will not be granted until the appropriate level of information has been provided and accepted.
Environmental Protection (Reading Borough Council)	EN16: Pollution and Water Resources	Contamination within the report refers to impact on ground water. The Environment Agency will assess the impact a development has on ground water but the Environmental Protection Team and Building Control also have a role to play to ensure contamination and land gas do not impact human health, the wider environment or buildings. Any assessment should address all receptors and consultation with the EP, EA and Building Control should be had if there is a risk from ground gas or contamination on the site. When a development is known to be on historic contaminated land or contamination could be an issue we should expect the developer to submit proportionate but sufficient site investigation information (a risk assessment) to determine the existence or otherwise of contamination, its nature and extent, the risks it may pose and to whom/what (the 'receptors') so that these risks can be assessed and satisfactorily reduced to an acceptable level. Defra has published a policy companion document considering the use of 'Category 4 Screening Levels' in providing a simple test for deciding when land is suitable for use and definitely not contaminated land. A risk assessment of land affected by contamination should inform an Environmental Impact Assessment if one is required. The risk assessment should also identify the potential sources, pathways and receptors ('pollutant linkages') and evaluate the risks. This information will enable the local planning authority to determine whether further more detailed investigation is required, or whether any proposed remediation is satisfactory.	Agreed. Change proposed. The policy and particularly the supporting text should be amended to reflect the potential impacts of contamination and land gas, and to provide more details on the provision of information at application stage.
Environmental Protection (Reading Borough Council)	EN16: Pollution and Water Resources	The IOA are producing Best Practice guidance on noise and sensitive development which is due to be published soon, we should ensure we take this Good Practice Guide into account in relation to specific development within Reading.	Noted. Change proposed. The supporting text should refer to this guidance.
Environmental Protection (Reading)	EN16: Pollution and Water Resources	- Reading Borough Council receives numerous planning applications for the introduction of new noise generating industrial and commercial equipment such as air conditioning; refrigeration plant and kitchen extraction	Agreed. Change proposed. A new policy on noise generating equipment should be included based on that

Borough Council)		<ul style="list-style-type: none"> - This equipment is often installed in close proximity to residential properties and has the potential to cause significant annoyance and/or sleep disturbance to residents or other businesses, and have a negative impact on residential amenity. - Planning applications for noisy mechanical plant are already required to be accompanied by a noise assessment which compares the noise level produced by the equipment against the existing background noise level using the British Standard 'Methods for rating and assessing industrial and commercial sound' (BS4142:2014). - Whilst the BS4142:2014 method gives some guidance on assessing whether the level of noise may have an adverse impact, its recent update has made this guidance more ambiguous and crucially it does not set a noise limit for new plant. - The Environmental Protection team for some years has required that the noise level from new mechanical plant be at least 10 dB below the background noise level in order to prevent 'background creep'. However, because this is not an adopted policy, officers are increasingly being challenged by developers to be more lenient, particularly since the update of the British Standard. - It is therefore necessary for a policy to be adopted by the Council which specifies a noise level that should be achieved when a planning application is made for the installation of new noise generating equipment. This would provide clarity to developers and would ensure the continuing protection of residential amenity from the potentially significant impact of noise from mechanical plant. <p>The Environmental Protection team requests that the Council adopts the following policy.</p> <p>"Reading Borough Council policy requires that newly installed noise generating equipment meets the following noise level standard:</p> <p>The noise source rating level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor."</p> <p>[See full response for detailed supporting text]</p>	suggested.
Thames Water	EN16: Pollution and Water Resources	<p>Given paragraph 156 and 162 of the NPPF and National Planning Practice Guidance (NPPG) on 'water supply, wastewater and water quality' (Paragraph: 001, Reference ID: 34-001-20140306), and given the importance of water and waste water issues we would like to see Policy EN16 amended to include the below text:</p> <p>"When there is a capacity constraint and improvements in off-site infrastructure are not programmed, the developer should set out how the infrastructure improvements will be completed prior to occupation of the development."</p>	Partially agreed. Change proposed. It is agreed that the policy should be amended to ensure that infrastructure is in place prior to occupation. A new paragraph in the supporting text should deal with information requirements.
Environment	Paragraph 4.2.83	We strongly recommend that a key way of meeting the concern about development leading to a	No change proposed. It is noted that

Agency		deterioration in water quality is to conduct a WCS which would identify where there might be problems with WFD status deterioration or preventing a water body achieving its future target status. Therefore it is recommended a WCS is undertaken.	Water Cycle Studies are not a requirement of national policy, and with resource constraints, each authority must consider what represents a proportionate evidence base. The full evidence base will be available on submission.
Cantay House Partnership	EN17: Flooding and Sustainable Drainage Systems	At present it is not clear in the supporting text to Policy EM17 whether the Council has already prepared a Sequential and/or Exceptions Test in accordance with the NPPF to inform the Draft Local Plan, or whether it is intended that this will be prepared in advance of the Pre-Submission consultation. This is necessary to ensure the Plan is sound and should also be consulted upon for completeness.	Noted. The Sequential Test was incorporated into the HELAA methodology, so it has been carried out, but it is agreed that it needs to be presented separately. It will be available at Pre-Submission stage.
Cantay House Partnership	EN17: Flooding and Sustainable Drainage Systems	Paragraph 4.2.87 of the Draft Local Plan refers to the need for a Sequential Test to be undertaken for proposals for development in areas of a medium or high risk of flooding. This should be amended however to make it clear that, for individual developments on sites allocated in the new Local Plan through the Sequential Test, applicants need not apply the Sequential Test, in accordance with paragraph 104 of the NPPF.' The Cantay Business Park is being formally put forward as a residential site through this representation and therefore the version that will accompany the Pre-Submission consultation should include an assessment of this site for consideration in that next round of consultation.	Agreed. Change proposed. Reference is now made to the Sequential and Exception Test having been carried out.
Environment Agency	EN17: Flooding and Sustainable Drainage Systems	We will need clarification on what is meant by 'high risk' within this policy. Is this in accordance with the NPPF and Tables 1-3 in the Planning Practice Guidance? If so this would mean no development at all will be permitted in the 1 in 100 year floodplain (Flood Zone 3a). Or do you mean the functional floodplain (Flood Zone 3b) and if so, where has this been defined? The SFRA has not yet defined Flood Zone 3b. If Flood Zone 3b is going to be split into developed and undeveloped then this needs to be clarified and the policy tailored to reflect this and justification needs to be provided from your up-to-date evidence base.	Agreed. Change proposed. The original wording of this policy in the Core Strategy predates much of the current flood risk national policy. It should be reworded to better reflect the national policy approach.
Environment Agency	EN17: Flooding and Sustainable Drainage Systems	Other sources of flood risk would need be included within this policy such as foul sewer flooding and groundwater flooding.	Agreed. Change proposed. The policy should clarify that it refers to flooding from all sources.
Environment Agency	EN17: Flooding and Sustainable Drainage Systems	Climate change adaptation and mitigation needs to be included in policy EN17 in terms of flood risk. We recommend that you also include the requirement for the new climate change figures within your supporting text. Developers will need to be aware of this guidance and you will need to use the new climate change figures to inform your local plan policies.	Agreed. Change proposed. The policy and text should be amended to refer to the climate change allowances.
Environment Agency	EN17: Flooding and Sustainable Drainage Systems	We strongly recommend that you add the following text to this policy to protect groundwater aquifers:- "Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects."	Agreed. Change proposed. This wording should be incorporated into the policy.

Environment Agency	EN17: Flooding and Sustainable Drainage Systems	A greater emphasis should be put on good design to maximise ecological value of the SuDS features.	Agreed. Change proposed. Reference to maximising ecological benefits should be included.
Reading Friends of the Earth	EN17: Flooding and Sustainable Drainage Systems	Front gardens and car parking areas should be made permeable.	Agreed. Change proposed. The supporting text should be amended to refer to this.
Reading Urban Wildlife Group	EN17: Flooding and Sustainable Drainage Systems	The government standards do not provide advice on planting swales. Other institutions have done research on this, such as "The dynamics of designed plant communities of rosette forming forbs for use insupra-urban drainage swales, James Hitchmough university of Sheffield a,*, Markus WagnerbaDepartment NERC. We suggest that the local plan should specify that expert advice be sought on planting schemes for swales in new developments and those being planted in other areas prone to flooding.	No change proposed. Swales are one component of SuDS, and, although referred to in the text, it is not appropriate to go into more depth on one particular element. Whichever specific method is used, it should comply with the requirements of this policy.
Reading Urban Wildlife Group	EN17: Flooding and Sustainable Drainage Systems	We would like to see a policy promoting the greening of front gardens for surface water control and biodiversity.	NO change proposed. The :Local Plan needs to deal with issues that it can control, and the greening of existing front gardens is not something which requires planning permission.
SGN plc	EN17: Flooding and Sustainable Drainage Systems	Paragraph 100 of the NPPF states that Local Plans should be supported by SFRA. The webpage to which footnote 55 refers only includes the previous SFRA dated March 2009. It is not confirmed in any of the current consultation documentation whether the Council intends to update the 2009 SFRA. Given the changes in national policy, EA guidance and also potentially updated flood modelling that have taken place since 2009 however, to appropriately address the requirements of the NPPF, it would appear sensible for the Council to update the SFRA, to be used by the Council as a basis for applying the Sequential Test, in accordance with paragraph 101 of the NPPF. At present it is not clear in the supporting text to Policy EM17 whether the Council has already prepared a Sequential and/or Exceptions Test in accordance with the NPPF to inform the Draft Local Plan, or whether it is intended that this will be prepared in advance of the Pre-Submission consultation. This is necessary to ensure the Plan is sound and should also be consulted upon for completeness.	Noted. The 2017 SFRA has been carried out and is available on the website. The Sequential Test was incorporated into the HELAA methodology, so it has been carried out, but it is agreed that it needs to be presented separately. It will be available at Pre-Submission stage.
Thames Water	EN17: Flooding and Sustainable Drainage Systems	We would like to support policy EN17 and its requirement for all major developments to incorporate SUDs in line with the Government's technical standards	Noted. No change proposed.
Environment Agency	Paragraph 4.2.86	In this paragraph SFRA has been mentioned. Is this referring to the current SFRA which is out of date and does not include the latest climate change extents? If the latest level 1 and level 2 SFRA is available we would welcome the opportunity to review this alongside the Draft Local	As the Local Plan is to cover a 20 year period, the reference is to whatever is the most up to date SFRA at any time.

		Plan.	The 2017 SFRA is now published.
Environment Agency	Paragraph 4.2.86	This paragraph states that 'the floodplain capacity should not be reduced by development or the raising of land'. Can 'should not' be replaced by 'shall not'. If there is a reduction of floodplain capacity as a result of development then we would object to the planning applications for these sites. This wording change would ensure consistency with paragraph 103 of the NPPF which requires that flood risk will not be increased elsewhere.	Agreed. Change proposed. 'Should not' should be replaced with 'shall not'.
Environment Agency	Paragraph 4.2.87	The FRA should also cover the raising of floor levels (needed for all sources of flooding) and safe access and egress. Climate change has not been considered in this section. Any mitigation needs to assess and mitigate in accordance with the latest guidance on climate change allowances.	Agreed. Changes proposed. The supporting text should be amended to make reference to these elements.
SGN plc	Paragraph 4.2.87	Paragraph 4.2.87 of the Draft Local Plan refers to the need for a Sequential Test to be undertaken for proposals for development in areas of a medium or high risk of flooding. This should be amended however to make it clear that, for individual developments on sites allocated in the new Local Plan through the Sequential Test, applicants need not apply the Sequential Test, in accordance with paragraph 104 of the NPPF.	Agreed. Change proposed. Reference is now made to the Sequential and Exception Test having been carried out.
Environment Agency	Paragraph 4.2.88	More clarity is required for this section. For example what can be classed as a site for regeneration, does it have to have buildings already in existence. This loosely worded text could allow argument for areas of hardstanding with no built footprint i.e. carparks, concreted areas, to be built on. There should be some constraints and guidance/policy around what can be defined as developed land.	Partially agreed. Change proposed. Some text should be added to clarify that these sites generally contain vacant or underused buildings. However, circumstances will differ from site to site, and this section cannot therefore be categorical.
Reading UK CIC	4.3: Employment	We agree with the approach taken especially in respect of offices given the current provision already build and vacant and in the pipeline with planning permission. Your policies allow for flexibility should employment land be found to be unsuitable or unattractive to the market for some time. You have also adopted a policy to maintain a variety of premises. Protection and increase of start-up and grow on space is particularly important to local people going in to self-employment and modern growth businesses. We support the regeneration of old industrial space where it is refurbished or rebuilt for modern technology businesses.	Noted. No change needed.
Reading UK CIC	4.3: Employment	We think that the policy should extend to encourage existing and new office buildings to be flexible in turning larger open plan floorplates in to small starter units and workspaces for example like the 'White Building' on Kings Road.	Agreed. Change proposed. It is considered that this is broadly covered by policy EM4, but the supporting text should be amended to clarify that this will include offices capable of such subdivision.
Aviva Life and Pensions UK Ltd	EM1: Provision of Employment	We do not consider this draft policy is beneficial and so recommend its entire deletion. The objective of the planning system, set out in the NPPF, is to stimulate economic development and	Not agreed. No change proposed. It is not agreed that the requirement to

	Development	not frustrate it. The concept that a developer proposing otherwise acceptable economic development may need to directly provide or fund provision of housing (including affordable housing) to mitigate the impacts of its economic development proposals, otherwise planning permission will not be granted, seems likely to negatively impact on the economic performance of UK Plc and run counter to national planning policy.	mitigate effects of employment development over the level planned for should be abandoned. The extent to which new employment development can put pressure on the housing market and exacerbate housing need is clear. Illustrative of this, the SHMA included an uplift in housing need as a result of economic growth. It is not sustainable for significant amounts of employment development to take place with no supporting mitigation of housing impacts.
Basingstoke and Deane Borough Council	EM1: Provision of Employment Development	BDBC is currently undertaking an Economic Needs Assessment that will provide an understanding of the borough's economic requirements up to 2050. Over the summer, the Council's consultants will be engaging with neighbouring authorities including RBC. Through this engagement, BDBC will be able to better understand the relationship between employment land provision in the two boroughs to inform whether there would be any adverse impacts from the proposed office space provision in Reading Borough, which exceeds the needs identified in the EDNA for Central Berkshire. It is important to ensure that there is a balance of housing and employment, and that the employment provision would not have a harmful impact upon neighbouring authorities.	Noted. No change proposed. It should be noted that the higher figure in the policy reflects what already has planning permission, and therefore the impacts of this levels of floorspace have already been tested.
Bracknell Forest Borough Council	EM1: Provision of Employment Development	<p>It is noted that Policy EM1 aims to meet the Borough's employment needs in full, and provides a contribution of 66,000 sqm of office floorspace to the wider Central Berkshire Functional Economic Market Area (FEMA). It is noted that this will need to be balanced against housing provision in the wider area.</p> <p>As previously stated, on the basis of the evidence currently available to this Council, it is unlikely that Bracknell Forest will be able to meet its needs for 'B' Class floorspace as set out in the Central Berkshire Economic Development Needs Assessment. Our 'Call for Sites' has resulted in minimal interest in promoting new sites for employment development. Whilst further consideration needs to be given to the future potential of our defined employment areas, it is considered that there will be a need to discuss the accommodation of some of our unmet needs with other Authorities in the Central Berkshire FEMA, including Reading Borough. The provision and contribution to the FEMA made through Policy EM1 is therefore welcomed.</p>	Noted. No change proposed. This issue will need to be considered across the Central Berkshire FEMA as a whole, and this is reflected in the supporting text.
Green Park Reading No.1 LLP	EM1: Provision of Employment Development	Whilst GPR supports the principles of this policy, they request that consideration is also given to the role that supporting employment uses, such as hotel, serviced apartment, retail and leisure uses can play in adding to the diversity, sustainability and vitality of office environments. Hotel, retail and leisure uses should also be acknowledged for their job creation benefits.	Agreed. Change proposed. There may be scope for uses that support the economic role of the areas to be included as long as they do not result

			<p>in a loss of employment land. This might include facilities for workers and visitors, such as retail, childcare etc. Policy EM2 and supporting text should be expanded to cover this.</p>
McKay Securities PLC	EM1: Provision of Employment Development	<p>Policy EM1 is not positively prepared and is overly restrictive towards employment development. The potential range in provision for office floorspace identified in the policy is extremely wide, with the higher figure being more than double that of the lower scenario. There is an identified requirement to provide 119,000 sq m of new office space which will contribute to the needs of the wider functional economic market area of Central Berkshire. Therefore, this is the figure which policy should aspire to and reference to the lower figure is irrelevant and should be removed.</p> <p>Furthermore, this policy is unduly onerous by seeking to require employment floorspace to provide residential development or contribute to affordable housing. This will make it harder for a competitive centre to emerge and will impact upon the viability of providing new employment space. Therefore, the policy does not accord with the NPPF para 23 which requires planning policies to be positive and promote competitive town centres. New office floorspace should be supported in the town centres to achieve this and it is the Council's responsibility to provide policies which encourage residential development on identified and appropriate sites. Additionally, there is no guarantee that the office sites will be appropriate for residential development.</p> <p>Furthermore, the supporting text for this policy states that "Reading is also therefore likely to meet a greater proportion of Central Berkshire's need for offices." The consequence of this is that many of those living in other areas of Central Berkshire may travel in to work in Reading office space without increasing demand for housing in Reading.</p> <p>Additionally, the 'Calculating Employment Need Figures' section states that there has in fact been a loss of office and industrial space creating a need for a greater net increase in employment floorspace to be delivered for the remainder of the plan period. It is not clear if proposed policy EM1 takes this enhanced figure into account. Policy EM1 should be amended as follows: "Provision will be made for an additional 119,000 sq m of office floorspace and 148,000 sq m of industrial and/or warehouse space in Reading Borough for the period 2016-2036." Subsequent clauses should be removed.</p>	<p>Not agreed. No change proposed.</p> <p>The higher figure is a reflection of what already has planning permission. The lower figure represents the assessed level of need. The Local Plan should not commit to delivering an oversupply of offices when compared to need based on historic permissions if those permissions do not come forward, and must therefore retain some flexibility.</p> <p>It is not agreed that the requirement to mitigate effects of employment development over the level planned for should be abandoned. The extent to which new employment development can put pressure on the housing market and exacerbate housing need is clear. Illustrative of this, the SHMA included an uplift in housing need as a result of economic growth. It is not sustainable for significant amounts of employment development to take place with no supporting mitigation of housing impacts.</p> <p>Recent loss of employment has already been factored into the need calculation. However, there is an error in the policy, which should state that the period is 2013-36 (and thus</p>

			the figures take account of completions).
Reading Friends of the Earth	EM1: Provision of Employment Development	The wide range of numbers quoted in the text and in the Policy demonstrates that this is far from an exact science.	No change proposed. No claims are made that it is an exact science, but the approach conforms with the requirement to identify objectively assessed need.
Reading Friends of the Earth	EM1: Provision of Employment Development	While Reading should remain a 'local hub' it should not seek to be the employment provider for the Western Berkshire Housing Area - to reduce the numbers of people travelling to Reading from 'dormitories' other larger towns and settlements should be given the opportunity to provide local employment. A 'Berkshire Structure Plan' should address this issue.	Noted. No change proposed. Reading is the most accessible location within the area, and it is the most sustainable approach for it to be the most significant employment location. However, the Local Plan does not seek to undermine the employment roles of other locations within the local area.
Reading Friends of the Earth	EM1: Provision of Employment Development	See comments above on Vision and Spatial Strategy. Brexit, automation and working from home are among the trends which have caused the massive drop in demand for floorspace seen over recent years and these may well continue.	Noted. No change proposed. Trends in how people are employed such as changing working practices are factored into employment projections upon which the Plan is based. This does not take account of Brexit, but there is no reliable information on what the effects of Brexit will be, and it would not be possible to factor that in.
Reading Friends of the Earth	EM1: Provision of Employment Development	Projected population growth in central Berkshire will make us less environmentally and economically sustainable so lower figures should be adopted for housing and employment.	No change proposed. It is not agreed that providing housing to meet needs will necessarily have this effect. Needs not met in Reading would need to be met elsewhere. The Local Plan follows national policy in identifying and seeking to meet objectively assessed needs.
Slough Borough Council	EM1: Provision of Employment Development	Slough Borough Council agree with the results of the 2016 EDNA , including that Reading falls within a different functional economic area (FEMA) to Slough; that Windsor and Maidenhead falls within both the Central and Eastern FEMAs; and Slough forms the Eastern FEMA with Windsor and Maidenhead.	Noted. No change proposed.
Slough Borough Council	EM1: Provision of Employment	Slough supports Reading's commitment to meet its industrial and warehousing need in full, but notes that it will provide an additional supply of offices. Slough has no objection to this provided	Noted. No change proposed. The Council will respond to Slough's formal

	Development	that this does not result in impacts on the Eastern FEMA. Slough would also seek to ask via the Duty to Cooperate if Reading has capacity to provide additional B1- B8 as Slough is anticipating it will not be able to meet its need in full.	duty to co-operate request separately, but in summary, in line with national policy, any surplus supply of offices would be expected to meet the needs of the FEMA within which Reading falls in the first instance. The evidence does not show capacity to provide additional office or industrial space whilst still seeking to meet as much of our housing needs as possible.
Thames Valley Berkshire LEP	EM1: Provision of Employment Development	We commissioned an Economic Development Needs Assessment on behalf of the Central Berkshire FEMA, of which Reading Borough is part, and we support the identification of employment land sufficient to meet the needs identified in the study.	Noted. No change needed.
Wokingham Borough Council	EM1: Provision of Employment Development	The Draft Plan states that there is scope to meet the identified need from the Central Berkshire EDNA in full and additional scope to overprovide office space by 66,000 sq m. Reading propose that this overprovision of office space can be seen as a contribution to the wider needs of the FEMA authorities. Therefore, there could be scope for any potential unmet office space need in Wokingham Borough to be accommodated in Reading.	Noted. No change proposed. This issue will need to be considered across the Central Berkshire FEMA as a whole, and this is reflected in the supporting text.
Wokingham Borough Council	EM1: Provision of Employment Development	The draft plan further states that major office developments (over 2,500 sq m) will be directed along a high-accessibility corridor focused on the A33, a new station at Green Park and forthcoming mass rapid transit links to the south. Any development along these transport corridors would have a major impact upon Wokingham Borough therefore Wokingham welcome the ongoing discussions with Reading as part of the Duty to Cooperate process.	Noted. No change proposed. This level of development has been considered in the Transport Assessment work prepared to support the Plan and shared with Wokingham BC.
Bell Tower Community Association	EM2: Location of New Employment Development	On the issue of core employment areas we would like to see a requirement in all policies on area EM2g (Richfield Avenue) that activities there should not have an adverse effect on the amenity of residential receptors, i.e. restrictions on operating /loading hours, noise, emissions as outlined in policy CC8.	No change proposed. Policy CC6 on Safeguarding Amenity applies to all developments of all types. Its purpose is to avoid having to refer to amenity considerations in a large number of policies covering every type of development.
Green Park Reading No.1 LLP	EM2: Location of New Employment Development	In relation to the location of new employment development, GPR request that specific reference is made to the role new office development plays in Core Employment Areas. GPR request that the first sentence of the policy be reworded as follows: "Major office development will take place in the centre of Reading and in Core Employment Areas along the A33 corridor."	Partially agreed. Change proposed. The proposed wording would have the effect of limiting office development to the CEAs, which is not the intention. There are sites outside the CEAs in the A33 corridor where major office may be appropriate, and indeed where such permissions have been

			granted. However, the supporting text should clarify that the A33 corridor includes some CEAs.
Green Park Reading No.1 LLP	EM2: Location of New Employment Development	Reflective of the comments on 4.6.16, the Core Employment Areas policy could include recognition for ancillary uses to support business and employment areas. The benefits of having ancillary facilities, such as retail, hotel and restaurants on site, encourage a community feel and make these areas an attractive place to work as well as increasing sustainability by reducing trips off-site.	Agreed. Change proposed. There may be scope for uses that support the economic role of the areas to be included as long as they do not result in a loss of employment land. This might include facilities for workers and visitors, such as retail, childcare etc. Policy EM2 and supporting text should be expanded to cover this.
Highways England	EM2: Location of New Employment Development	As sites EM2a, EM2b, EM2c and EM2d are located immediately to the north of the M4 we would like to be consulted about any planned change and/or intensification of use beyond the existing site planning permissions.	Noted. No change needed.
Reading Friends of the Earth	EM2: Location of New Employment Development and EM3: Loss of Employment Land	Conversion of car parking space, and dedicated car parks, to employment development should be encouraged.	Agreed. Change proposed. The supporting text should highlight the potential for on-site intensification including use of surplus car parks.
Thames Properties Ltd	EM2: Location of New Employment Development	Thames Properties welcome the reduced allocation for Richfield Avenue CEA and the proposed release of some of the CEA for housing. We would, however, urge RBC to consider the suitability of the Richfield Avenue CEA for continued provision of 'major employment' uses, as originally intended under the CEA designation. The policy does not define 'major employment uses' and further clarity is welcomed in this regard	Major office developments and major industrial/ warehouse developments are defined in paragraphs 4.3.8 and 4.3.9. The wording of 4.3.9 can be tweaked for clarity.
Thames Properties Ltd	EM2: Location of New Employment Development	<p>The Richfield Avenue CEA designation is outdated and, we suggest, no longer justified. In our view the reclassification of this area to incorporate a wider range of leisure and retail uses alongside small scale employment and some residential would be far more appropriate. A Vision Document is included to indicate how land within the Richfield CEA area may start to come forward in the future.</p> <p>The Council acknowledged that the Richfield Avenue CEA has aged over time and increasingly become a location for other commercial uses that are non-traditional employment uses, such as a casino, car dealerships and a bar, and also that vacancy levels are reasonably high (Issues and Options paragraph 4.27, Appendix 6).</p> <p>Thames Properties has independently reviewed the demand for existing buildings within the CEA and found that there is very little, if any, demand for large industrial units in this location. Vacancy levels are highest in the larger units (c. 5,000 sq.ft and above) is generally very limited,</p>	<p>Partially agreed. Change proposed.</p> <p>There may be scope for uses that support the economic role of the areas to be included as long as they do not result in a loss of employment land. This might include facilities for workers and visitors, such as retail, childcare etc. Policy EM2 and supporting text should be expanded to cover this.</p> <p>Where proposals would result in a loss of employment land, it is considered</p>

		<p>as typically these occupiers have migrated away from the area to the A33 and M4 locations. Where buildings are large and bespoke, as with the former Cox and Wyman building (considered further on in this submission), it is very difficult to secure an occupier to let the building. Demand is understood to be strongest for the smaller workshop/office units (up to c. 5,000 sq.ft). Such units are occupied by small local businesses, suggesting the CEA has a role to play in attracting and supporting local start-ups and SMEs to Reading.</p> <p>Thames Properties would therefore like to see greater flexibility within the wording of Policy EM2 to accommodate non-traditional employment uses such as leisure, retail and hotel facilities, and a degree of residential development. This would serve to enhance the vitality and viability of the CEA as a destination for those visiting, living and working in the Borough. These changes could also facilitate improved pedestrian linkages to Reading Town Centre and therefore ensure the long-term sustainability and viability of this CEA. The CEA occupies a very strong location, being in close proximity not only to Reading town centre and all of its associated services and facilities, but also to Caversham (and area also exhibiting signs of growth and progression) and from a recreational perspective, the Thames Meadows and nearby uses.</p>	<p>that the policy should generally resist this. Richfield Avenue CEA remains a location which continues to make a strong contribution to Reading's economic success. However, it is recognised that, on some specific sites, a situation might arise where there is little long-term prospect of employment use, and in these cases it an alternative commercial use is preferable to a long-term vacancy. The policy allows for this. The supporting text can be expanded to note the particular issue of large bespoke units where this might arise.</p> <p>It is not considered that the policy should allow the loss of CEAs for residential. Where employment land is redeveloped for housing, this needs to be undertaken in a plan-led way that takes account of the many issues, in particular amenity issues, rather than allowing piecemeal, ad hoc redevelopment.</p>
Bracknell Forest Borough Council	EM3: Loss of Employment Land	It is noted that Policy EM3 seeks to avoid the loss of employment land within core employment areas. It is questioned how effective this will be in limiting the amount of land lost to housing due to the Prior Approval process, should this be an issue in Reading Borough. Bracknell Forest Council has recently consulted on a proposed Article 4 Direction in respect of Bracknell's designated Employment Areas in order to regulate the loss of employment floorspace to housing.	Noted. No change proposed. The Council is aware of the issues in resisting loss of employment floorspace through the prior approval process. This has so far not affected our Core Employment Areas. The potential for introducing an Article 4 direction remains an option to consider if and when necessary.
Cantay House Partnership	EM3: Loss of Employment Lane	It is clear from paragraphs 4.3.4 and 4.3.5 that Reading has a surplus of employment land. The flexibility and associated approach proposed to be applied to employment areas outside of the 'Core Employment Areas' is supported given that it could enable employment land, located for example, in the middle of a residential area to be released from an employment use.. This flexibility of approach is particularly important given that Reading Borough is not able to	Noted. No change proposed. It should be clarified that Reading does not currently have a surplus of employment land.

		accommodate their full housing need within their own boundaries.	
McKay Securities PLC	EM3: Loss of Employment Land	In some cases, it may not be possible or appropriate to retain the same amount of employment land due to meeting other policy requirements and wider planning benefits such as new open space, improve connectivity, safety etc. If a loss of employment land can be fully justified by meeting other policies aims, it would be onerous and unduly restrictive to not take this into consideration and the policy would just act as a barrier to development, rather than a guide. Policy EM3 should be amended as follows: "Within the Core Employment Areas, the overall level of employment land should be maintained. Proposals that would result in a loss of such land will not be permitted <u>be resisted unless fully justified.</u> "	No change proposed. The level of flexibility inherent in the suggested wording would not be appropriate in view of the importance of the CEAs to Reading's economy, and would give no certainty on how applications will be judged. The policy allows some flexibility to consider alternative commercial uses in the exceptional cases where there is genuinely no long-term prospect of employment use on site.
Robert Cort Industrial Properties Ltd	EM3: Loss of Employment Land	<p>The representations relate to the Robert Cort Industrial Estate and Preston Road Industrial Estate, identified as part of EM2f. The sites fall within Flood Zone 1. There are no listed buildings within the vicinity of the sites. The sites are accessible and well connected to the surrounding local area. The sites are close to full occupancy, although vacant units have been difficult to let due to accessibility issues and other constraints. Demand for Preston Road units have historically been low. The longest leases at the site end during the next decade. The units are ageing and have needed constant refurbishment over time. Refurbishments costs are increasing as the units get older and the presence of asbestos may lead to subsequent refurbishments becoming unviable due to the low rents experienced. With changes to EPC ratings in the future the Preston Road units are unlikely to meet rising standards without significant costly investment. The Preston Road sites are on a hill which means that access for commercial vehicles is very tight at best. Furthermore the access road is not straight which introduces further constraints for HGV's (including a requirement for such vehicles to reverse downhill). In addition the loading bay doors for most of the units are off the steep incline which hampers their operation. These constraints cannot be addressed within the current configuration and limit the end use of the units.</p> <p>The balance in the emerging Local Plan is weighted in favour of employment land with the Plan accommodating its full needs for employment development, but identifying a shortfall in meeting needs for housing.</p> <p>The sites were considered suitable for development in the HELAA against many of the relevant categories. The unsuitability identified in terms of health and safety is due to potential noise issues from the surrounding industrial uses, and a small amount of potential land contamination, both of which could be mitigated against as part of any development scheme. The remaining unsuitability factors relate to the loss of the existing employment..</p>	<p>No change proposed. The sites within this areas were considered as part of the HELAA process, and were not considered appropriate for release for housing. The site is almost fully occupied, and is one of the main locations for small business units in Reading.</p> <p>However, it is recognised that, where it can be demonstrated that there is no realistic long term prospect of employment use within a designated CEA, then there should be scope to consider alternative commercial uses. This would be less likely to compromise the use of surrounding employment uses than residential. A change is therefore proposed to the supporting text to policy EM3 to reflect this.</p>

		<p>A number of the current industrial uses are likely to remain in the immediate future. In the medium to longer term however the age of many of the buildings is leading to increasing requirements for expensive remediation works. The low rental levels our clients are achieving, allied to the site specific constraints, will not warrant the substantial development costs associated with a wider redevelopment of the site for replacement uses.</p> <p>Should these circumstances arise, they are therefore seeking a more flexible policy context for future uses of the site, which could potentially allow for alternative uses (including residential and commercial) should the refurbishment or redevelopment of the units become unviable. Such flexibility would be consistent with both the NPPF (paragraph 22) and the emerging Local Plan (paragraph 4.3.11). The lack of flexibility within EM3, alongside the lack of clarity regarding the requirement for a lack of “long term (i.e. over five years) prospect of employment use” result in such a “blanket protection” which the emerging plan purports to resist. Furthermore in restricting the alternative use permitted not only lacks further clarity but fails to respond to the “pressing need” for additional housing development.</p>	
Chris Bedford	EM4: Maintaining a Variety of Premises	The shortage of small business premises (4.3.16) could be alleviated if business were given preference over housing in cases where conversion from retail is acceptable under RL3.	No change proposed. RL3 seeks to retain retail and related uses in the first instance, so the supply of such space is likely to be very small. We are not aware of any particular demand for such space amongst small businesses.
Reading Friends of the Earth	EM4: Maintaining a Variety of Premises	Flexibility is key to avoid need for redevelopment.	Noted. No change proposed.
Reading Friends of the Earth	EM4: Maintaining a Variety of Premises	Support mention of start-up space.	Noted. No change proposed.
Gladman Developments Ltd	4.4: Housing	The Housing White Paper: Fixing our Broken Housing Market is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement of intent that this Government is serious about the provision of the right number of houses in the right places. The Local Plan therefore needs to consider these policy intentions now in order to ensure that it fulfils the Government’s agenda and provides the homes that its local communities need.	Noted. No change proposed. The Council is aware of the White Paper proposals and will seek to ensure that the Plan takes account of these as they arise.
Reading UK CIC	4.4: Housing	We agree with the analysis and demand for housing especially affordable housing in Reading and it should be stressed that this is essential to the functioning and successful future growth of the economy. An economy like Reading’s needs a variety of housing available from small single person units through family homes to executive homes that will attract senior executives and their companies. The latter will probably be mostly met in the outlying villages and rural areas in neighbouring areas however.	Noted. No change proposed.

Reading UK CIC	4.4: Housing	<p>The Local Plan should stress that we have an economic and employment led demand growth for housing not as in many parts of the country a housing led regeneration of the economy. This sets us apart in many ways and needs a different approach. The plan also needs to pay regard to the need to be sustainable and make employment sites easily accessible to residential areas and to tackle the inequality by making enough affordable housing for local people so they have easy access to local jobs in new employment developments.</p> <p>The plan should stress the need to plan housing provision (in addition to other community facilities) in tandem with housing provision. Clearly we are in a housing deficit housing situation so the plan should clearly state the need for employment proposals especially in the town centre to consider how their business occupiers will support the provision of affordable housing locally which is accessible and affordable to local people. Such is the importance of new housing to meet the local labour needs of our growing economy that we would also encourage the plan to stress the need work with neighbouring authorities where they have housing sites close to our boundary and close to employment opportunities.</p>	Agreed. Change proposed. This is an important point, and therefore needs to be made earlier in the document, in section 1, when mention is made of the evidence.
Bracknell Forest Borough Council	H1: Provision of Housing	It is noted that the Western Berkshire Housing Market Area Strategic Planning Framework acknowledges that there may be a shortfall in Reading Borough and that collaborative working will be required. Bracknell Forest Council believes that the unmet need should be addressed as close to Reading as is possible.	Noted. No change proposed. New analysis through the HELAA has resulted in the housing provision figure in H1 being increased. A Memorandum of Understanding relating to Reading's unmet need has now been agreed across the Western Berkshire HMA.
Ian Campbell	H1: Provision of Housing	<p>In most markets the normal response to fast growing prices is to increase supply until prices revert to their normal levels, which simply reflect production costs. It is strange the housing market is not able to do the same in a way which does not destroy unnecessary stretches of England, and Berkshire's green and treasured land. Containment policies will only work for limited periods. It is my opinion their continuation will have unacceptable social and economic consequences, and must be replaced with long term housing supply policies able overtime to achieve a long term sustainable equilibrium.</p> <p>A weakness of the Local Plan is the acceptance of the SHMA figures as the goal. By its own admission these housing targets will not return affordability to historic levels. This can only be done with cross-party political commitment to provide the house building land the market demands in the next few decades.</p> <p>For these reasons, this draft Local Plan is not sustainable. It will fail to return house prices to their historic norms. House price buying ratios have doubled in ten years, and tripled in twenty years. This is policy failure on a grand scale. Sadly, and however extraordinary it may seem, for the young who do not own their home a return to post war price normality is not seen as an</p>	<p>No change proposed. The Council is serious about delivering high levels of quality housing, and improving affordability insofar as is possible.</p> <p>The Local Plan does not set out to return house prices to 'normal' levels. The implication seems to be that this is wholly within the ability of planning to control. It is not. The plan sets out to provide the housing needed, and does so insofar as is possible.</p> <p>This response considers that the Local Plan ducks the issue, but does not set out what the Local Plan should practically do within the boundaries</p>

		<p>objective in the new draft Local Plan. Instead it will perpetuate and increase the injustice in the housing market which relentlessly transfers wealth from the have nots to the haves.</p> <p>As there is plenty of unprotected land near Reading; as there is no shortage of funding if the Council uses powers on offer by Government; as there is no lack of state of the art design creativity available to provide smart urban solutions, this ongoing abdication of responsibility by the Council for future residents housing needs is hard to comprehend. Since 2010 in response to local pressures the Government has yielded to the demand for more local autonomy in housing supply. That is a welcome step. With more local power comes more local responsibility. Reading Council and its neighbours must step forward. So the next step is local leadership.</p> <p>What seems desperately sad is attitudes locally have not moved forward since the 2010 government policy decision to transfer across to local councils responsibility for new housing supply and despite fast growing pressure to build many more house across the political spectrum in Westminster. Reading's growing prosperity puts its Local Plan at the forefront of the land supply dilemma. So far the Council seems to have missed the opportunity to match the leadership emerging elsewhere.</p> <p>In the Thames Valley there is plenty of unprotected white land, much of it with reasonable road and rail access, sufficient to accommodate a similar scale of housing needs for the next two generations, say 200,000 new homes over sixty plus years. Design issues come second. High density housing with excellent public transport is the way forward. The Conservative Party manifesto talks of mansion blocks, mews houses and terraced streets; these are different ideas to the traditional low density suburban estates built since the nineteen fifties which are now days seen everywhere.</p>	<p>within which it has jurisdiction to deliver additional homes, over and above what is proposed.</p> <p>The points about the need for leadership in delivering homes over the wider area with a long-term view are valid, and the Council is seeking to do this, but the Local Plan cannot be the mechanism that delivers this on its own.</p>
Ian Campbell	H1: Provision of Housing	<p>These are the land supply delivery steps that I recommend be followed and the chronological sequence needed to have a realistic chance of mending the broken supply system.</p> <ul style="list-style-type: none"> • STEP 1. Announcement of an intention to eventually produce a massive increase in the supply of local housing (and therefore local housing land) through the introduction of a very long-term supply policy to stop house price inflation. It will apply for the period 2030 to 2080. In the meantime the Local Plan policies will be followed. • STEP 2. At the same time local councils will jointly produce by 2020 a horizon map, identifying all local council land and the boundaries of all existing major land use restrictions which are subject to current protection policies. • STEP 3. During the following five year period 2020 to 2025 all councils, together with their neighbours will use the horizon map to produce and adopt a building sites or long term housing land (2025 to 2080) policy map based on the exclusions which are left over on the horizons map. • STEP 4. Call this new map the designated search area (DSA) map. It will identify in each sub- 	<p>The approach relies on a commitment across a wide sub-area to a long-term housebuilding programme. It is some way beyond what a Local Plan for an individual authority within the area is capable of dealing with on its own. The Council agrees that long-term vision for growth of the area is needed, and the West of Berkshire Spatial Planning Framework is a starting point for ongoing dialogue between the relevant local authorities. This dialogue has been, and continues to be, constructive. However,</p>

		<p>region all the white land zones where housing can be accommodated anywhere at any time up to 2080 because protection policies do not apply. Within the DSA the map might distinguish those white land areas where there is a reason why despite the land being white land, development will not be supported locally even in the long term, and those remaining areas where housebuilding is not ruled out, and therefore is possible in the future. These two categories can be called "preferred white land" and "rejected white land". White land will not be classed as 'rejected white land' unless there is appropriate legal authority. It is expected that virtually all white land will be deemed to be 'preferred white land' as it is unprotected. This is the principle.</p> <ul style="list-style-type: none"> • STEP 5. By 2025, when all areas have completed the research and adopted the regional DSA policy the government can if it decides review all the DSA maps to confirm whether there is sufficient "preferred white land" in each region to meet all housing need today, and two generations into the future. • STEP 6. In the short term, by 2025 once local councils have formally adopted their DSA map the value of all land and buildings inside the preferred white land zones will become fixed. Any subsequent changes in value due to market movements will be excluded from compensation under the CPO code if the land or buildings are later acquired for development by the delivery body. This creates a new source of funding through land value capture. In affluent areas with high land values, retention by local communities of development values will make new housing self funding. These funds will pay regional and national infrastructure needs and will provide sufficient local compensation to residents whose quality-of-life will suffer. • STEP 7. Three additional changes should be introduced at the same time. Legislative changes maybe needed. <ul style="list-style-type: none"> A. An alteration to the existing compulsory purchase code, whereby landowners whose land is acquired receive between 25 and 100% higher than market value at the DSA adoption day. B. All land property values within the "preferred white land" parts of the DSA will be frozen at prevailing market levels. C. Introduction of generous compensation for existing residents whose quality of life and value of their home are adversely affected by the adoption of the DSA policy. • STEP 8. Local plans will decide on their programme for the release of the white land in accordance with a supply programme intended to stabilise house prices in line with inflation. • STEP 9 From 2030 the new long-term DSA based policies will replace those parts of the adopted local plan where conflict arises. • STEP 10 Around the same time the governance changes needed to liberate land supply in the local areas will take effect. The new delivery body will take over responsibility for buying the land identified in the DSA map, granting the necessary housing consent, selling the land 	<p>inevitably, growth on this scale would not be within Reading's boundaries, and this Council is not in a position to override the statutory responsibilities of other local planning authorities. Attempting to do so would be more likely to hinder rather than help effective joint working.</p>
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		to builders.	
Cantay House Partnership	H1: Provision of Housing	It is clear from paragraphs 4.4.1 to 4.4.5 that Reading Borough do not envisage being able to accommodate their full housing need within its own boundaries. Whilst it is noted that this issue is set out within the West of Berkshire Spatial Planning Framework, where ever additional sites become available that are outside of the functional floodplain and are not public open space, it is clear that these sites must be fully considered in order to contribute to addressing Reading's housing need.	Noted. No change needed. Reading's HELAA has sought to consider all sites with development potential.
Commercial Estates Group	H1: Provision of Housing	<p>These representations are in relation to the land at South West Reading. Initial studies indicate that it could yield circa. 150 hectares of developable land, which could provide a range of between 5000-6500 dwellings, local centres, employment, open space, leisure and sports space/facilities and school/education provision. The site could tie into significant planned infrastructure investment, including rapid transit routes running through the site that provide a link between the forthcoming Green Park Station and Reading. This is subject to more detailed constraints analysis, any proposed technical solutions and open space provision. In particular, work is being undertaken which will identify a number of technically sound flood mitigation measures. The site is identified within the Draft Plan as a potential future development location, and also as a strategic option in the West of Berkshire Spatial Planning Framework.</p> <p>To be sound a plan must be positively prepared, and based on a strategy that seeks to meet objectively assessed needs for development in a way that is consistent in achieving sustainable development. In principle, the undertaking of the Berkshire SHMA is supported as the appropriate mechanism for understanding the basis of the area's objectively assessed needs for housing. The Vision and Objectives reflect the NPPF's emphasis on positive planning to achieve sustainable development. The Spatial Strategy goes on to set out that the strategy for Reading itself sits within a wider spatial approach that is being taken at sub-regional level, providing the basis to positive cross-boundary working on strategic planning matters.</p> <p>To be sound a plan must be justified. The strategy must firstly be appropriate when considered against the reasonable alternatives. The Issues and Options consulted on various policy scenarios for the Plan, which has now been translated into the first full draft Plan. The Plan has chosen to deliver the maximum quantum of suitable housing that is considered to be suitably deliverable when based on the findings of evidence base studies such as the HELAA. Given the likelihood of other potential strategies being unsound, such as by being undeliverable or not sufficiently positive, it is considered that the proposal to deliver 658 dpa is justified when considered against the alternatives.</p> <p>The Plan must also be based on proportionate evidence. There are no upward adjustments applied to help meet the identified affordable housing need and instead the SHMA suggests that this could instead be considered as part of an adjustment to improve the overall affordability of</p>	<p>Noted. New analysis through the HELAA has resulted in the housing provision figure in H1 being increased. A Memorandum of Understanding relating to Reading's unmet need has now been agreed across the Western Berkshire HMA.</p> <p>It is agreed that H1 can be expanded to refer to the need to work together to ensure that unmet needs are met.</p>

		<p>market housing for younger age groups. A significant shortfall will remain for dedicated affordable housing provision. It is therefore questioned whether the housing requirement is justified.</p> <p>The approach of the HELAA is consistent with Planning Practice Guidance. It is very likely that any further uplift to the delivery rate of 658 dpa would be unachievable without causing significant impacts through environmental harm, or through the loss of open space and employment / commercial land. It is clear from this that the Plan has sought to meet the objectively assessed housing needs and that the evidence base relating to housing delivery is justified in its attempts to find sufficient capacity within the tightly constrained Borough</p> <p>For the Plan to be considered effective it should be deliverable within the plan period. It requires the Plan to demonstrate effective joint working on cross-boundary strategic matters. The authorities have produced the West of Berkshire Spatial Planning Framework, the thrust of which has been loosely transferred into the DRBLP. From this, Reading Borough's commitment to joint working is supported, however there are currently concerns over the effectiveness of the Plan to provide sufficient certainty for such joint working arrangements.</p> <p>A firm policy commitment should be made that sets out to ensure any unmet housing needs are met by neighbouring authority areas through the Duty to Cooperate. This could either be achieved through additional wording within Policy H1, or through a new policy that sets out clearly the Council's commitment to joint working on strategic planning matters such as housing, employment and infrastructure. Any such policy should detail how Reading Borough will seek to monitor and engage with the plan-making processes across the remainder of the HMA to ensure objectively assessed needs are met. A similar policy to was requested in the Inspector's Report on the Birmingham Development Plan (paragraph 67).</p>	
Gladman Developments Ltd	H1: Provision of Housing	<p>It is essential that the objectively assessed housing needs of the Borough are met in full and that the plan sets out how this will be achieved, having fully considered this through the plan preparation process and in discharging the duty to cooperate. Where there are issues of unmet need, the mechanism for securing the most appropriate strategy for accommodating any such needs elsewhere in the HMA should be tested through plan making and the mechanism for enabling this clearly set out within policy wording. This will require positive engagement on this important cross boundary issue with all relevant neighbouring authorities within the functional housing market area through the duty to cooperate and this process should be supported by documentary evidence. In this regard, Gladman welcome the Council's confirmation at paragraph 4.4.5 of the Plan, that there will be continuing dialogue on this matter between the affected authorities which will inform the Pre-Submission version of the plan.</p> <p>Gladman would expect the policy wording to provide greater certainty that the OAN will be met</p>	<p>Noted. New analysis through the HELAA has resulted in the housing provision figure in H1 being increased. A Memorandum of Understanding relating to Reading's unmet need has now been agreed across the Western Berkshire HMA.</p> <p>It is agreed that H1 can be expanded to refer to the need to work together to ensure that unmet needs are met.</p>

		in full within the housing market area and a commitment to on-going monitoring of the situation regarding unmet need to ensure that corrective action can be swiftly taken to resolve any issues with delivery during the plan period.	
Greater London Authority	H1: Provision of Housing	The approach to housing need set out in the Berkshire Strategic Housing Market Assessment (SHMA) is welcomed, in particular the use of a 10-year historic migration trend and the consideration of an adjustment to reflect pre-recession migration patterns to and from London. The Council should note that our latest population and household projections will be published in w/c 10 July 2017. These projections will form the basis of the next London Plan and will include consistent outputs for all local authorities in England.	Noted. No change needed.
Greater London Authority	H1: Provision of Housing	The draft Plan states that the Council cannot accommodate identified need for 943 dwellings within its boundaries over the Plan period. We support the joint West of Berkshire Planning Framework and in particular its strategic perspective on longer term growth opportunities within the area and agree this should be developed as an avenue to address the shortfall identified in the draft Plan.	Noted. New analysis through the HELAA has resulted in the housing provision figure in H1 being increased. A Memorandum of Understanding relating to Reading's unmet need has now been agreed across the Western Berkshire HMA.
Kier Property Developments Limited	H1: Provision of Housing	Our client supports the provision of an average of 658 homes per annum in Reading Borough for the period 2013 to 2036 and supports the provision of housing within the town centre.	Noted. No change needed.
Persimmon Homes	H1: Provision of Housing	<p>Whilst it is acknowledged that Reading does suffer constraints namely its tight boundaries and the presence of the Thames, however Reading are seeking to meet 94% of their total needs. If this seems to be achievable, then finding an additional 41 dwellings per annum should be possible. Reading should consider re-assessing their housing allocations and looking to identify additional sites which could supply housing. Particular focus should be given on sites in existing residential areas which can be redeveloped and it would seem that the south of the town centre would be an appropriate location for such sites to exist.</p> <p>In addition to this, the Housing White Paper advocates that Councils should use a five year review mechanism as part of their Local Plans going forward. This would allow the Council to review their allocated sites and measure the quantum of development proposed against their outstanding needs and trajectories. It is becoming quite common place for local authorities to put three year reviews into their Local Plans so as to reassess the housing trajectory and whether the current progress is still applicable. In this instance we would advise that Reading also consider putting in place a three year review mechanism with regards to their housing requirements going forward. In not meeting their housing needs in full, this will place additional pressures on the remaining authorities within the HMA to meet their needs in addition to the shortfall and this will exacerbate the housing needs situation within the HMA.</p>	<p>New analysis through the HELAA has resulted in the housing provision figure in H1 being increased.</p> <p>It is not agreed that it is possible to simply "find" 41 additional dwellings per year, and it is noted that this comment is made without any regard to the evidence base that has been published, which assesses capacity in a thorough manner.</p> <p>It is also not agreed that a three year review is necessary or appropriate. This would involve re-consulting on the first stage of a new plan almost as soon as the plan is adopted. A Memorandum of Understanding has been signed to deal with Reading's unmet needs across the Housing</p>

			Market Area.
Reading Friends of the Earth	H1: Provision of Housing	Don't accept that identified 'needs' for housing or employment are accurate or should be met. They are developed without assessment of environmental capacity. The Strategic Housing Market Assessment is based on pre-Brexit trends.	No change needed. The methodology for assessing housing needs complies with national guidance on such assessments.
Reading Friends of the Earth	H1: Provision of Housing	Projected population growth in central Berkshire will make it less environmentally and economically sustainable and less attractive so much lower figures should be adopted for housing so that this remains an attractive and prosperous area.	No change proposed. There is a significant need for new housing in the area. National policy is that this should be assessed, and provided for wherever possible. Simply not providing for it will not be a sustainable approach, and in addition will simply lead to developments being granted on appeal.
Reading Friends of the Earth	H1: Provision of Housing	Housing should cater for a flat age distribution of population so that retired people are not under pressure to move away - this will benefit community and family relationships.	No change proposed. The plan needs to assess the needs of groups requiring housing and plan for them. Ensuring that homes are accessible and adaptable (policy H5) should address this issue.
Reading Friends of the Earth	H1: Provision of Housing	Rate of development should be phased down over the plan period - particularly after 2026 when many existing permissions will have been fulfilled.	No change proposed. The Housing Trajectory does show a lower rates of delivery later in the plan period, although this is not by design.
Reading Urban Wildlife Group	H1: Provision of Housing	We believe that there should be an ability to review these numbers since the requirements were calculated pre-brexit decision. This may mean a radical change in housing need in terms of the number and type of dwellings. The strategic market housing assessment should be reviewed after 5 years and adjustments made to the plan if there are substantial changes.	No change proposed. It is currently proposed that Local Plans will be reviewed on a five-yearly basis in any case.
Rentplus	H1: Provision of Housing	We support the use of a minimum target for housing delivery in Reading, as this sets an ambitious and encouraging approach to housing provision over the Plan period. Recognising that this will not meet Reading's need is important, and should remain the foundation for the other housing policies to ensure that developments are as ambitious as possible in seeking to meet this need.	Noted. No change needed.
Ropemaker Properties Ltd	H1: Provision of Housing	Ropemaker Properties Ltd object to this policy on the basis of paragraph 47 of the NPPF. As we previously suggested and in light of the affordable housing requirements the Council should look to exceed the OAN. The supporting text for this policy recognizes that Reading has a very tightly defined urban area and has a heavy reliance on previously developed land for new housing development. However the introductory text of the plan acknowledges Reading as a centre of the Thames Valley and a net importer of workers together with a transport hub. The town is clearly important economically both at the local and regional level and this is only set to	New analysis through the HELAA has resulted in the housing provision figure in H1 being increased. However, it is still not considered possible to deliver the full objectively assessed need within the Borough. The fact that an application has been submitted does

		<p>increase with Crossrail coming to the town in 2019.</p> <p>'Fixing our Broken Housing Market' emphasises the importance of building on previously developed land to support the regeneration of cities, towns and villages (paragraph 1.24), this is further reemphasized at paragraph 1.52 which requires applicants and local authorities to be ambitious about what sites can offer and especially in areas where demand is high, and paragraph 1.53 sets out a number of bullet points which includes increasing the height of buildings in areas that are well served by public transport.</p> <p>The Council should consider increasing indicative numbers on town centre sites. An application (reference 170326) has been submitted on approximately half of allocation CR12b at Weldale Street for 429 dwellings, yet the emerging policy suggests that that whole site could only hold 280-430 dwellings, when this is clearly not the case.</p>	<p>not mean that the level of development is acceptable, taking account of a wide range of factors including character. It should be noted that the number in the HELAA is largely derived from the site of this application in any case.</p>
<p>Royal Berkshire NHS Foundation Trust</p>	<p>H1: Provision of Housing</p>	<p>The draft Plan identifies a shortfall of 943 dwellings for the plan period. The supporting text to emerging Policy H1 (Provision of Housing) refers to Reading as a 'tightly defined area' with the availability of sites for housing constrained, and states that the remaining need will be accommodated within the wider Western Berkshire HMA. It is however apparent that no sites have been identified in the other Local Planning Authorities in the housing market area; therefore, there is no assurance that this shortfall would be addressed in the plan.</p> <p>In 2016 and 2017 completions were above the OAN. However, prior to this the completions were below the OAN for the plan period. The Housing Trajectory identifies that 46 of these completions were non-residential (C3). This would exacerbate the shortfall against the housing delivery targets of the plan as proposed.</p> <p>As identified in paragraphs 14 and 47 of the NPPF, Local Plans should meet the full OAN for market and affordable housing in the housing market area. The draft Local Plan does not achieve this, and we therefore draw your attention to the fact that the plan as proposed cannot be considered to meet the 'soundness' test as outlined in paragraph 182, as it has not been 'positively prepared'.</p>	<p>New analysis through the HELAA has resulted in the housing provision figure in H1 being increased. A Memorandum of Understanding relating to Reading's unmet need has now been agreed across the Western Berkshire HMA. The other authorities within the HMA are not at a stage with their new Local Plans where they have identified sites, so it is unsurprising that sites outside the Borough have not yet been formally identified.</p> <p>This comment has misunderstood the Housing Trajectory. 46 of the completions were not non-residential. However, there was a net loss of non-C3 residential at an equivalent of 46 dwellings. It should be noted that this net loss was in advance of development for residential. It is hardly surprising that completions before 2015 were below objectively assessed needs as development levels recovered from a deep and long lasting recession. The plan period must be</p>

			<p>considered as a whole.</p> <p>It is simply not possible to accommodate the full OAN within Reading, as demonstrated within our HELAA. This comment seems to work on the basis that this in itself renders the plan unsound, which is not the case. Any shortfall must be justified and planned for, and this is what the plan does.</p>
SGN plc	H1: Provision of Housing	<p>It is recognised that there may be issues with Reading’s ability to accommodate its need within its own boundaries which might prevent the Borough from meeting its full objectively assessed need. One of the core planning principles set out in paragraph 17 of the NPPF however is that “every effort should be made objectively to identify and then meet the housing ... needs of an area, and respond positively to wider opportunities for growth (our emphasis)”.</p> <p>To this end the HELAA tests alternative scenarios in order to test to what degree densities would need to be increased in order to eliminate this shortfall, however this concluded that a 50% uplift in densities would be required ‘across the board’ for all identified sites. This was not considered appropriate for a number of reasons, as detailed in the HELAA.</p> <p>For the reasons set out in Section 4 however, it is considered that the Gas Holder site is capable of accommodating a significantly higher number of dwellings than the Draft Local Plan currently envisages. Increasing the allocation of the Gas Holder site to up to 120 dwellings would help to increase the number of new homes that can be provided for and thus reduce the number of new homes that surrounding authorities in the Western Berkshire HMA are expected to accommodate.</p>	<p>No change needed. It is not necessarily agreed that the Gas Holder site is able to accommodate a significant increase in density that would make any difference to the shortfall. It should be noted that there are constraints to this site, which is adjoined to the south and west by low-rise residential and sits opposite a listed school. A high density is already assumed. 120 dwellings on this site would mean developing at around 170 dph, and this would require substantial justification in this location some distance from the core of the centre.</p>
Slough Borough Council	H1: Provision of Housing	<p>Slough supports the approach to meeting housing needs which recognises that Reading is a very tightly defined urban area, and sites for new development are limited. This means that, like Slough there is not enough land to meet the objectively assessed housing needs within the Borough.</p> <p>The Reading draft local plan states that the need will be accommodated elsewhere within the Western Berkshire Housing Market Area. It is considered that Slough Borough Council supports this approach.</p>	<p>Noted. No change needed.</p>
Andrew Smith	H1: Provision of Housing	<p>The Foreword to the draft Plan states that there is an acute need for affordable housing in the Borough. This represents more than half of the identified need. However, the draft Plan suggests that no more than 30% on site affordable units are to be sought from each development. Therefore, the most that can be expected is 197 affordable units per annum. Therefore, the</p>	<p>No change proposed. The Council is committed to securing affordable housing wherever it can. However, it is constrained by what it is viable to</p>

		<p>draft Plan is currently under-delivering on affordable units by 153 units per year, or 3,519 affordable units over the plan period.</p> <p>It is understood that viability drives the overall on-site provision of affordable housing and that seeking more than 30% on site could be deemed unviable. However, to plan to significantly under-achieve on such a key issue from the outset of the plan period is unacceptable. The draft Plan should be prepared on the basis of exceeding this minimum and delivering more total units over the plan period and thus delivering more on-site affordable units.</p>	<p>provide on sites and the availability of land for both affordable housing and general needs. The HELAA demonstrates that there is not scope to exceed this minimum, due to the constraints of the Borough rather than a lack of will.</p>
South Oxfordshire District Council	H1: Provision of Housing	<p>South Oxfordshire District Council note the shortfall identified by Reading Borough Council and agree that this should be accommodated elsewhere in the Western Berkshire Housing Market Area. We would encourage continuing dialogue between Reading Borough Council and the three other authorities within the West Berkshire Housing Market Area to resolve this. Whilst South Oxfordshire District Council is a neighbouring authority of Reading Borough Council, it is recognised however that South Oxfordshire District Council forms part of a distinct separate Housing Market Area.</p>	<p>Noted. New analysis through the HELAA has resulted in the housing provision figure in H1 being increased. A Memorandum of Understanding relating to Reading's unmet need has now been agreed across the Western Berkshire HMA.</p>
Thames Properties Ltd	H1: Provision of Housing	<p>Having regard to the need to accommodate additional housing and make best use of Reading's limited land, Thames Properties would urge RBC to consider existing and sustainable brownfield sites that can be used more efficiently to accommodate housing, including the Richfield Avenue CEA. The CEA is situated in close proximity to the town centre; Thames Meadows; and employment provision. The site is suitably located as a destination for additional housing as part of a composite, mixed use development for the CEA.</p> <p>Given the pressing need for new housing in Reading and the limited availability of sites for redevelopment within the Borough boundary, this would seem entirely appropriate, and indeed consistent with national guidance, which advises local planning authorities to recognise the diverse types of housing needed in their area and, where appropriate, identify specific sites for all types of housing to meet their anticipated housing requirement.</p>	<p>No change proposed. The Council considered the Richfield Avenue through the HELAA process, but this was not considered suitable for reasons set out in that assessment. However, at the same time, the Central Berkshire EDNA identified a strong need for new employment floorspace, and all that reallocation of the CEA would achieve is changing the type of development for which there is an unmet need.</p>
Thames Valley Berkshire LEP	H1: Provision of Housing	<p>We were the seventh, paying-partner in commissioning a Strategic Housing Market Assessment for Thames Valley Berkshire and we therefore support the OAN figure for Reading Borough, and co-operation with neighbouring authorities to meet this challenge.</p>	<p>Noted. No change needed.</p>
University of Reading	H1: Provision of Housing	<p>In order for the Draft Plan to be considered sound, it must be positively prepared as required by the NPPF (paragraph 182), and to therefore use the available evidence in seeking to meet the OAHN for the Borough in full (NPPF, paragraph 47). If the Plan is to be considered positively prepared and therefore sound, it must seek to deliver the full OAHN of 699dpa, whilst noting that this is the level of OAHN arrived at by GL Hearn in 2016, which used methodology that would be open to challenge. The SHMA included a scenario which established demographic-led OAHN of over 1,000dpa whilst the figure of 699dpa did not include an uplift for affordable housing need (see the PPG (paragraph ID2a-029)). We would remain of the view that the Plan should increase the housing target beyond 700dpa to help deliver affordable housing. Notwithstanding this, the</p>	<p>New analysis through the HELAA has resulted in the housing provision figure in H1 being increased. A Memorandum of Understanding relating to Reading's unmet need has now been agreed across the Western Berkshire HMA.</p> <p>Both promoted sites are included within the Local Plan, and reasons for</p>

		<p>Council have only produced a Draft Plan which claims it is capable of delivering 658dpa, representing a shortfall of 943.</p> <p>The 2017 Housing White Paper emphasises the need to bring more small and medium sized-sites forward in order to make more land available for homes in the right places (page 18, Step 1: Planning for the right homes in the right places). The two promoted sites would therefore make a useful contribution and should be developed as efficiently as possible. The White Paper also states: “Policies in plans should allow for a good mix of sites to come forward for development, so that there is choice for consumers [and] places can grow in ways that are sustainable.” (Paragraph 1.29, p25, 2017 Housing White Paper)</p>	<p>the level of development proposed are set out. It is simply not possible to accommodate the full OAN within Reading, as demonstrated within our HELAA. Any shortfall must be justified and planned for, and this is what the plan does.</p>
University of Reading	H1: Provision of Housing	<p>The University object to Draft Policy H1. The Council have not presented a Draft Plan for consultation that meets the OAHN in full as required by the NPPF, paragraph 47. The Council states that it intends to work with neighbouring Authorities under the Duty to Cooperate in order to ascertain if the dwelling shortfall can be met in adjacent Council areas.</p> <p>Whilst provision within the NPPF paragraph 179 allows for a local planning authority to not provide for its OAHN in full where valid constraints exist preventing it meeting that identified need, we consider that existing sites included as allocations would have the capability to contribute a greater number of dwellings towards the Borough’s OAHN. This should be explored further prior to the Council seeking assistance from neighbouring Councils under the Duty to Cooperate. There are options to make more efficient use of sites included within the Draft Plan, in particular those at Redlands Road and the Boat Club.</p> <p>The Boat Club site has been identified as having potential to accommodate between 18 -25 dwellings on land solely within Flood Zone 2, excluding all land within flood Zone 3 from consideration. Technical solutions can be found to produce housing in such areas without unacceptable flood risk created for future occupants of those dwellings or increasing flood risk to nearby properties and / or land.</p> <p>We recommend that the Council consider amendments to the allocation specific policies and produce an updated SHMA to account fully for affordable housing need in line with the PPG (paragraph ID2a-029).</p>	<p>No change proposed. The HELAA sets out in a thorough, site-by-site manner, why it considers that there is not the capacity to meet the needs in full, and justifies why particular figures are considered appropriate for particular sites. It should be noted that the NPPF is based on achieving objectively assessed development needs where this is in line with sustainable development principles, and this does not mean abandoning the important planning principles affecting sites.</p>
Viridis Real Estate Services Limited	H1: Provision of Housing	<p>We consider that the RBC has underestimated its capacity, particularly in the central Reading area. The HELAA site density is based on the ‘pattern book’ approach and as an ‘Urban Residential new-build’ this equates to 74 dwellings per hectare. The ‘pattern book’ approach is a generic density tool which does not take account of the individual circumstances of a site or housing market conditions that may justify higher densities. In contrast the adjacent site, Forbury Retail park, has been treated as ‘Town Centre Fringe’ with a density well in excess of</p>	<p>No change proposed. It is not agreed that the Council has underestimated its potential. The patten book approach (which has resulted in densities of 81 rather than 74 dph being applied to ‘urban sites’) is a</p>

		<p>200 dwellings per hectare. It is our view that there is no difference between the site, environmental or planning policy constraints of both sites and that the Forbury Business Park and Kenavon Drive site should be considered as 'Town Centre Fringe' where higher density development will be permitted, which would reflect its location in one of the central Reading opportunity areas.</p> <p>In rejecting Option H1 (iv) (the full OAHN), the Sustainability Appraisal makes the incorrect assumption that meeting the full OAN would negatively effect undeveloped land and the natural environment. This would only be the case if the Council fails to make efficient use of previously developed sites in the centre of Reading. Furthermore, the Council is in the position to manage change in more sensitive areas through its other Local Plan policies. All development would place additional strain on Borough services and infrastructure, which can be mitigated through planning obligations as necessary. Again the Council is in the position to direct development to areas with existing services and infrastructure to promote sustainable development. It is our view therefore that the Council has erred in underestimating the development potential of its sustainably located previously developed sites in the central areas of Reading, and that by being more ambitious in these areas, i.e. at Site AB015, the social, environmental and economic effects of additional housing numbers to meet the full OAN could be managed.</p> <p>If the density of the Forbury Business Park and Kenavon Drive site was increased to reflect its town centre fringe location then the housing figure in Policy H1 could be increased by at least 358 units. On this basis Policy H1 is not positively prepared or consistent with national policy. We would therefore request that the full OAN be adopted and that policy H1 be amended to reflect this and that the site capacity of site AB015 - Forbury Business Park and Kenavon Drive be identified as being at least 500 units.</p>	<p>clear and consistent way of approaching housing sites, and the HELAA allows from divergence from this where it is justified.</p> <p>Specific comments on the Kenavon Drive site are dealt with in responses to CR13.</p>
West Berkshire District Council	H1: Provision of Housing	West Berkshire District Council acknowledges that there are constraints to development in Reading Borough which contribute to the identified shortfall. In line with the West of Berkshire Housing Strategy, West Berkshire District Council will consider whether it is possible to accommodate this shortfall (either in full or in part) as Reading moves towards submitting its local plan for examination and as it progresses its own local plan.	Noted. New analysis through the HELAA has resulted in the housing provision figure in H1 being increased. A Memorandum of Understanding relating to Reading's unmet need has now been agreed across the Western Berkshire HMA.
West Berkshire District Council	H1: Provision of Housing	<p>Work on a new Local Plan for West Berkshire is in its infancy. The SHMA indicates a higher level of housing need for West Berkshire than is provided for in the current Local Plan. West Berkshire will seek to work collaboratively with neighbouring authorities, particularly those within the Western Berkshire HMA, to seek to meet its identified housing requirement in the new Local Plan. As part of this work any unmet need identified in the HMA will also be considered.</p> <p>West Berkshire district also has considerable constraints to development; therefore any new</p>	Noted. No change needed.

		<p>housing target identified will be arrived at following additional work which will consider the constraints to, and opportunities for, development, and will be informed by the collaborative work with the other authorities within the Western Berkshire HMA. The main constraints include the North Wessex Downs AONB, areas of flooding, and the presence of the Atomic Weapons Establishments in Burghfield and Aldermaston. There are also further heritage and environmental constraints, such as Registered Battlefields, Special Areas of Conservation, and Sites of Special Scientific Interest.</p> <p>To help inform the preparation of the new Local Plan, the Council recently conducted a 'call for sites' for its HELAA. This document when complete will make a preliminary assessment of the suitability and potential of sites, and the information gathered from this process will help to inform the new Local Plan.</p>	
Wokingham Borough Council	H1: Provision of Housing	Wokingham Borough Council (WBC) received a letter in January 2017 from Reading Borough Council, which asked whether WBC, along with West Berkshire, would be in a position to take some of their potential unmet housing need. At that time, Wokingham Borough Council replied and emphasised that the issues should be discussed by all local authorities within the West Berkshire Housing Market Area, which should also include Bracknell Forest Council. Wokingham Borough Council acknowledges the efforts that Reading Borough Council has made to accommodate their need and the efforts made to engage with adjoining authorities. However, it is recommended that WBC take this opportunity to re-emphasise the need for this issue to be an ongoing discussion amongst all of the West Berkshire HMA authorities.	Noted. New analysis through the HELAA has resulted in the housing provision figure in H1 being increased. A Memorandum of Understanding relating to Reading's unmet need has now been agreed across the Western Berkshire HMA.
Wokingham Borough Council	H1: Provision of Housing	WBC would welcome further clarification of the capacity work undertaken by Reading Borough Council in order to understand whether there is potential for them to identify the modest additional capacity required to fully accommodate their own shortfall. Unexpected windfalls, increasing density and/or utilising excess employment land may address the existing shortfall. It would also be helpful to understand the timing of any potential shortfall.	Discussions took place between the Western Berkshire HMA areas about the assumptions that led to the housing provision figures, and some alterations have been made to the HELAA methodology. This is part of the reason for the change in the dwelling figure in H1. These discussions are detailed separately in the Duty to Co-operate statement.
Bellway Homes Ltd	H2: Density and Mix	We are in general support for the content of the policy in relation to density and linking the density of development permissible to a sites accessibility amongst other factors.	Noted. No change proposed.
Bellway Homes Ltd	H2: Density and Mix	<p>It is noted that the requirement for the majority to be houses rather than flats has been removed which is supported.</p> <p>Nevertheless we contend that in seeking to secure the most efficient use of land to 'deliver as many new homes as possible' there will be some sites, such as the Battle Hospital site, where it will simply not be possible to offer over 50% of dwellings as 3 bed or larger and deliver a viable</p>	Partly agreed. Change proposed. The wording of the policy should be in line with the existing policy, stemming from the SDPD Inspectors Report. However, the wording suggested by the Inspector and referred to here

		<p>residential scheme which fulfils the other relevant objectives of the plan. Accordingly we are of the view that the current wording is too stringent. A view shared by the Inspector who considered the SDPD, as confirmed in paragraphs 48 and 49 in his report (September 2012). In line with his comments we consider the wording of the third paragraph should be amended as follows:</p> <p>“.....On new developments for 10 or more dwellings outside the central area and defined district and local centres, the Council will seek to ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations.”</p>	<p>refers to “the Council”, whereas the Council may not always be the decision-maker. It should instead refer to “planning decisions” .</p>
Bellway Homes Ltd	H2: Density and Mix	<p>The wording of the final paragraph of the policy which requires residential proposals for 10 houses or more to include at least 10% of plots as self-build is considered unduly onerous and will not be practicable on some sites where constraints are such that apportioning part of an otherwise deliverable housing site to third parties is neither safe nor practicable. In addition demand for self-build is an uncertain and evolving part of the housing sector. Paragraph 4.4.13 of the Draft Plan indicates there are 41 entries on the self-build register, which represents a tiny fraction of the level of housing projected to be delivered over the plan period.</p> <p>Due to these concerns and lack of clarity and detail around delivery, the self-build element should be deleted from policy H2, as such measures would make it difficult for Developers to plan for the comprehensive delivery of a large scale housing site due to the implications relating to health and safety, the overall appearance of the finished development and subsequent impact upon sales. It is also highly unlikely that anyone wishing to self-build, would wish to be located within a large scale development.</p> <p>As an alternative, specific standalone self-build sites should be allocated within the Borough that would not prejudice the delivery of large and strategic sites, which are required to meet the Council’s anticipated housing needs. A call for sites exercise would no doubt reveal a suitable selection of sites.</p>	<p>Change proposed.</p> <p>The Council has a statutory duty to grant sufficient planning permissions to meet the needs on the self-build register. This is something that therefore needs to be addressed in the Local Plan, and deletion of any requirements is therefore not an option.</p> <p>However, the scale of the demand on the self-build register may well fluctuate, and it therefore makes sense to change to policy to link it to the register.</p> <p>The Council has already asked for sites to be identified for self-build in previous Local Plan consultation exercises, and no developers or owners nominated a site.</p>
Booker Group PLC	H2: Density and Mix	<p>In general, Policy H2 is a suitable approach to assessing housing density and mix in new developments. As indicated by Policy H2, a bespoke approach is often most appropriate when assessing development proposals. We would therefore support a policy approach to housing mix that allows for the constraints and opportunities of each development site to be taken into account, and does not set overly prescriptive requirements that would not be appropriate in all areas.</p> <p>We support Policy H2 as we consider that it is necessary to implement a general minimum density</p>	<p>Noted. No change proposed. The policy is written to allow the most appropriate density to come forward on a site within the context of that site, with density ranges set as a guide.</p>

		<p>policy in order to ensure that the full potential of brownfield development sites is realised. However, minimum density requirement should be set at a level that does not prejudice the development of new residential schemes (which rely on viability and market demand) and enables high quality developments, appropriate to the area they are located within, to come forward.</p>	
Bracknell Forest Borough Council	H2: Density and Mix	<p>Paragraph 4.4.7 sets out indicative density ranges for Town Centre, urban and suburban areas. It's not clear how these are likely to be applied and the densities given cover wide ranges. The application of these densities could have consequences for the ability to deliver dwellings and meet needs - this particularly applies to 'fringe' areas.</p>	<p>No change proposed. It is clear from the text that these are an indication, and ultimately, the appropriate density will vary from site to site. In an urban location such as Reading, where virtually every development will be inserted into an existing area with its own constraints, it is not possible or appropriate to apply more specific densities as a policy target.</p>
Persimmon Homes	H2: Density and Mix	<p>This policy is problematic on the basis of viability as there is little flexibility with regards to provision of, in particular, 2 bedroom houses. We would consider that there should be a reduced threshold for provision of 3 bedroom houses to ensure that a suitable mix is provided on these developments.</p>	<p>This would not help to meet the mix of homes needed in Reading. Should the requirement render development unviable, this will be one of the material considerations referred to in the policy. This was considered in the examination into the SDPD where there was an equivalent policy, and the Inspectors conclusions were that the wording adequately addressed this matter. The supporting text should refer to viability.</p>
Ropemaker Properties Ltd	H2: Density and Mix	<p>Ropemaker Properties Ltd object to this policy. This policy sets out indicative densities in the town centre of above 100dph. It is not clear from the policy where this figure has come from, however it is clearly not an ambitious target in line with the aims of the Government white paper. The supporting HELAA shows a pattern book approach has been used to consider development potential using recently permitted schemes, which shows at paragraph 3.5 that town centre residential new build averages 325dph, and town centre fringe residential new build averages 200dph. This demonstrates that densities are being achieved (subject to site constraints) significantly above that suggested in the local plan and policy H2 should be updated to reflect this.</p>	<p>No change proposed. Applying average densities to sites in the town centre is highly problematic, as it will be very much dependent on the individual site. Just within town centre developments under construction at the time of writing, there are densities as low as 80 dph and as high as 680 dph. For this reason, "above 100 dph" with no upper level expressed is appropriate as an indication. The text can clarify that densities could be much higher.</p>

			As stated in the text, these are not hard and fast policy rules.
SGN plc	H2: Density and Mix	<p>Generally the approach set out in Policy H2 is supported, however concerns are raised regarding the last part of the policy, which requires 10% of plots on all proposals for ten houses or more to be provided as self-build plots.</p> <p>Firstly, although the exclusion of houses that are to be provided as affordable homes is supported in principle, the wording of the policy potentially leaves room for confusion. Is it the Council's intention that 10% of all market housing on qualifying sites should be provided as self-build plots? It is also assumed that by referring to "houses" the self-build requirement does not apply to flats or maisonettes; however this ought to be clarified in either the policy itself or the supporting text.</p> <p>Secondly, it is unclear how the Council has derived the requirement of 10%, when supporting paragraph 4.4.13 suggests that only 41 people are listed on the Council's Self-Build Register. A 10% requirement therefore appears excessive when this level of local demand for self-build housing is compared against the Council's overall level of housing need.</p> <p>The provision of 10% self-build plots on qualifying sites could also have significant viability implications, particularly for sites with higher infrastructure costs or abnormal costs relating to remediation of contaminated land etc. If the Council is minded to retain this requirement, we consider that the words "subject to viability and all other material considerations" should be inserted to provide sufficient flexibility in the policy wording.</p> <p>It is also unclear whether the fact that self-build units are not required to contribute towards CIL or other Section 106 requirements, as set out within the PPG,4 has been taken into account in deriving this 10% requirement. This also has the potential to negatively impact larger allocations, particularly those with substantial infrastructure requirements.</p> <p>Furthermore, the Local Plan should allow for any self-build plots to revert to the developer should there be insufficient demand for such plots. The timing of this reversion should seek to minimise delays to the delivery of schemes, in order to reduce uncertainties in the build programme for developers and reduce any additional costs as a result of abortive work.</p>	<p>Change proposed. It is agreed that the scale of the demand on the self-build register may well fluctuate, and it therefore makes sense to change to policy to link it to the register rather than include a simple 10% requirement. The supporting text should also be clarified to ensure that it is clear how it is to be calculated, and that it does not apply to flats/maisonettes and affordable homes.</p> <p>It is also agreed that clauses should be introduced to allow reversion to the developer.</p> <p>The fact that self-build does not pay CIL is unlikely to affect the vast majority of sites, as most infrastructure comes from the overall CIL pot rather than being paid for by specific schemes. In this sense it makes little difference whether the self-build plots that the Council has a duty to provide are delivered on large schemes or on smaller, dedicated schemes.</p>
University of Reading	H2: Density and Mix	<p>The University objects to the draft Policy H2 requirement to include at least 10% of plots as self-build. This requirement would impose an unnecessary and unfeasible obligation on the University and should be applied on a case by case basis, where feasible and appropriate. It would therefore not be justified in its current form, applying against all developments (including flats and student accommodation), and would be unsound in terms of the NPPF at paragraph 182.</p>	<p>Change proposed.</p> <p>The Council has a statutory duty to grant sufficient planning permissions to meet the needs on the self-build register. This is something that</p>

			<p>therefore needs to be addressed in the Local Plan, and deletion of any requirements is therefore not an option.</p> <p>However, the scale of the demand on the self-build register may well fluctuate, and it therefore makes sense to change to policy to link it to the register, and to change the wording to allow more flexibility.</p>
Viridis Real Estate Services Limited	H2: Density and Mix	<p>Viridis welcomes the flexible approach to development density in H2. However, paragraph 59 of the NPPF explains that density standards should be informed by neighbouring development and the wider local area. With this in mind we believe that there are other local factors that should also be included in the density criteria in Policy H2, including housing type, mix and townscape character and context.</p> <p>Townscape character and context are critical aspects to planning for the quantum and mix units in housing developments. The central Reading area is experiencing change and the new Local Plan should be able to respond to this changing urban context. Development proposals should be informed by the changing urban environment and that the housing density and mix of a scheme should be able to respond positively without being constrained by rigid density and housing mix requirements.</p> <p>On this basis Policy H2 is not positively prepared, effective or consistent with national policy. We would therefore request that Policy H2 be amended to incorporate the following:</p> <ul style="list-style-type: none"> • Refer to housing mix and local character and context in the points relating to density; • That higher densities will be supported having regard to local character and context; 	<p>Agreed. Change proposed. The criteria should be amended to refer to housing mix and townscape. The policy already identifies that a different density may be appropriate, and the supporting text should cross refer to CC6 on accessibility and the intensity of development which highlights the need to make best use of accessible sites.</p>
Viridis Real Estate Services Limited	H2: Density and Mix	<p>The private rented sector (PRS) has experienced substantial growth in recent years. In 2015-16 PRS accounted for 20% of households nationwide. Of this, the proportion of PRS households with children increased to 36%.</p> <p>The NPPF provides at paragraph 50 the objective to deliver a wide choice of homes and that local planning authorities should plan for a mix of housing based on current and future market trends and the different need of the community and that they should identify the size, type, tenure and range of housing required in particular locations to meet local demand.</p> <p>The Government has long supported the provision of PRS and recognises the important role it plays in meeting the needs of the housing market by offering choice and in supporting economic</p>	<p>Agreed. Change proposed. A new policy (H4) on the private rented sector will be included in the Pre-Submission Draft.</p>

		<p>growth and access to jobs. In the wake of the Montague Review (2012) the Government implemented a number of measures to promote PRS: The formation of a time-limited task force charged with kick-starting the sector;</p> <ul style="list-style-type: none"> • Publication of guidance for industry and also for local authorities; • Facilitating access to short-term and long-term debt finance through the Build to Rent Fund, the Private Rented Sector housing guarantee scheme, and more recently the Home Building Fund; • Amendments to the NPPF, in particular in reference to viability assessment in the context of PRS schemes. <p>In February 2017 the 'Housing White Paper' reinforced the Government's commitment to PRS and confirmed its proposal to change the NPPF to ensure that LPA's plan proactively for PRS and to make it easier for PRS developers to offer affordable private rental products as part of their affordable housing provision. As part of this the Government is consulting its 'Planning and Affordable Housing for Build to Rent' paper which seeks views on planning measures to support an increase in PRS schemes.</p> <p>The SHMA shows that in Reading there has been a significant shift towards the PRS between 2001 and 2011, with over 50% of households aged under 35 being PRS. Based on CLG household formation rates and market signals the number of households aged under 35 is set to increase over the period up to 2036.</p> <p>In view of the Government approach toward PRS and the demographic and market trends in Reading, the DLP is unsound in that it fails to make provision for the housing needs of all members of the community, in particular the private rental sector. On this basis Policy H2 is not positively prepared, effective and consistent with national policy. We would therefore request that Policy H2 be amended to recognise the importance of PRS as a viable housing product for meeting known housing needs in Reading.</p>	
Bellway Homes Ltd	H3: Affordable Housing	To accord with the NPPG Ref ID 23b-031, upheld by the Court of Appeal the policy should be amended to omit requirements for affordable housing from schemes of 10 units or less.	Not agreed. There is substantial evidence of the urgent need for more affordable housing in Reading. The Court of Appeal decision clarified that the ministerial statement and PPG do not have the effect of overriding evidenced and justified local policies. As such, it is considered appropriate to continue seeking affordable housing from small sites (with some exceptions). Recent appeal decisions have largely supported this approach.

Bellway Homes Ltd	H3: Affordable Housing	Paragraph 5 of the policy and paragraph 4.4.22 of the Draft Plan indicates that family sized affordable housing is a priority. This is inconsistent with the evidence base. Table 108 of the Berkshire SHMA (February 2016) quantifies the proportion of affordable units which are needed by reference to size of accommodation by number of bedrooms. The commentary to the table at preceding paragraph 8.36 notes that in the affordable sector the key finding is a higher need for smaller homes in all areas. In Reading one can see that more than three quarters of affordable need is for 1 and 2 bed housing. It is unclear why this is not reflected in the content of policy H3, with the assertion that there is a priority for affordable family sized accommodation not being borne out by the evidence. The policy and paragraph 4.4.22 should be amended accordingly.	Partially agreed. Change proposed. It is agreed that there is an apparent inconsistency here that should be clarified. The issue arises because the need for family-sized affordable housing includes two-bed accommodation, rather than the three-bed plus units referred to in H2. Amendments to the policy H3 and the supporting text to H2 and H3 should resolve this.
Booker Group PLC	H3: Affordable Housing	The Council has set out at Policy H3 that, on sites of 10 or more dwellings, it will seek the provision of 30% affordable housing, as far as it is viable. We support this approach and consider that developers should be given the opportunity to submit evidence which demonstrates the level of affordable housing that can be provided without jeopardising the viability of the development. This is in accordance with the NPPF paragraph 179.	Noted. No change needed.
Bracknell Forest Borough Council	H3: Affordable Housing	Since affordable housing forms a significant part of the Borough's overall need, there may be viability issues in delivering this amount of affordable housing. Some concern is expressed that this may have implications for the wider HMA.	Noted. No change needed. The policy delivers the level of affordable housing that it is possible to provide in line with national policy on viability.
Kier Property Developments Limited	H3: Affordable Housing	Our client considers that the policy wording should be broadened to include reference to discounted market rent. It is generally accepted that a 20% discount on market rent would qualify for an appropriate affordable housing product, This is the approach that is adopted in London under the London Plan.	Partially agreed. Change proposed. A new policy should be added on Build to Rent schemes, which recognises Affordable Market Rent as an appropriate product to fulfil affordable housing requirements in those developments.
Kier Property Developments Limited	H3: Affordable Housing	A policy supporting private rental sector schemes should be included within the plan and could be included as a new subsection within policy CR6 or as a new policy itself. For example, a policy expressing positive and practical support to sustain the contribution of the private rental sector in addressing housing needs and increasing housing delivery. The newly adopted Birmingham Development Plan (January 2017) includes text within its policy on affordable housing, the general thrust of which could be adopted in the Reading Local Plan.	Agreed. Change proposed. A new policy (H4) on the private rented sector will be included in the Pre-Submission Draft.
Persimmon Homes	H3: Affordable Housing	Persimmon would support this policy with the percentage of affordable housing being 30% for sites of 10 dwellings or more. By ensuring that the percentage is at this level this would allow for schemes to be brought forward in the knowledge that they can be viable and without being impacted upon by increasing thresholds.	Noted. No change needed.
Rentplus	H3: Affordable Housing	This policy is considered a pragmatic response to the high level of local need for affordable housing; the progressive thresholds will help ensure that affordable housing is brought forward	No change proposed. Any changes to national policy will need to be

		<p>from all schemes that are capable of delivering this, and as such is supported.</p> <p>The tenure mix however, whilst in line with existing Government policy, does not yet reflect the emerging policy approach proposed by successive consultation documents. This includes the introduction of rent to buy within the NPPF, which sought to widen the definition to allow an even more flexible and responsive set of tenures that better reflects the reality of delivering affordable housing across the country. Whilst Reading experiences a continued acute need for affordable housing, particularly for family sized housing, it is considered necessary to respond to the Government's agenda by widening the types of affordable housing that will be encouraged in the Borough.</p> <p>Rent to buy is not an intermediate tenure, instead being defined more clearly as a hybrid, providing affordable rent for the period in which tenants save towards full purchase of their home. As tenants rent for between 5 to 20 years at an affordable rent the model does not fit within the current definition of intermediate housing. As a hybrid model, the tenure enables households to access affordable rented housing that does not require them later to move house in order to purchase, or to staircase ownership; this gives Rent to buy households the certainty of a secure tenancy and the ability to achieve their aspiration to own their own home. For the duration of the tenancy the homes are managed by the partner Registered Provider, enabling the family time to integrate with the surrounding community and contribute to their local area. This contributes to the creation of stable and balanced communities.</p> <p>The Rentplus rent to buy model seeks to enhance the affordable housing already being delivered in the borough, either as a standalone product or as part of the overall affordable housing offer on mixed development sites. With house prices and rents continuing to rise beyond reach for many within Reading, Rentplus provides an opportunity for those trapped by not being able to save for a mortgage deposit, to use an affordable rent period to save towards purchasing their home. This can have a real impact on affordability, improving the ability to deliver even more affordable housing on residential schemes across the Borough, and enabling even more households to access housing they can afford.</p>	<p>considered as and when they are made. The Local Plan will not attempt to pre-empt such changes.</p> <p>The needs for affordable homes in Reading are significant and immediate. Whilst Rent to Buy potentially has a place in overall housing provision, it is unlikely to meet the needs of the significant number of households in need of genuinely affordable housing. Nor is a form of housing that would not be affordable in perpetuity a sustainable solution to the long-term affordable housing needs shown in the Berkshire Strategic Housing Market Assessment. As such, the policies continue to place the emphasis on forms of housing most likely to meet needs.</p>
University of Reading	H3: Affordable Housing	The University supports in principle draft Policy H3 concerning affordable housing. However, we wish to comment that there is no mention of Starter Homes. The Housing White Paper (2017), whilst not imposing a statutory requirement, encourages local planning authorities to include Starter Homes within affordable housing requirements.	Agreed. Change proposed. The text should refer to the proposed changes to the affordable housing definition, which may require an updated SPD.
Viridis Real Estate Services Limited	H3: Affordable Housing	The policy explains that it will seek the appropriate mix of affordable housing to include social rented, affordable rent, intermediate rent and shared ownership units. We consider that this should be not only be informed by identified Borough wide housing needs, but that the tenure mix should also have regard to local/neighbourhood housing context and site constraints. The reasoning for this is to ensure that balanced and inclusive communities are supported as required	Partly agreed. Change proposed. It is agreed that there is an apparent inconsistency here that should be clarified. The issue arises because the

		<p>by the NPPF.</p> <p>Policy H3 also states that the priority need is for family sized housing. However, this does not reflect the findings of the SHMA which states that for Reading 43% of units should be 1 bedroom, 32.9% 2 bedroom, 21.6% 3 bedroom and 2.1% 4+ bedroom. The NPPF states that housing mix requirements should be based on local demand. In the absence of a RBC Housing Needs Assessment, Policy H3 should adopt the SHMA figures.</p> <p>On this basis Policy H3 is not positively prepared, justified or consistent with national policy. We would therefore request that Policy H3 be amended to incorporate the following:</p> <ul style="list-style-type: none"> • State that in addition to identified housing needs, affordable housing mix will be informed by site constraints and local/neighbourhood housing context; • Delete "Priority needs are currently for family sized housing, specialist accommodation for vulnerable people and extra care housing. The Council will regularly monitor and review the need for, and delivery of, affordable housing." 	<p>need for family-sized affordable housing includes two-bed accommodation, rather than the tree-bed plus units referred to in H2. Amendments to the policy H3 and the supporting text to H2 and H3 should resolve this.</p> <p>The policy already refers to site suitability. It is not considered that the policy should include further reference to site context, as in the majority of cases, affordable housing delivery in line with the policy will be appropriate.</p>
Environment Agency	H4: Standards for New Housing	<p>We are pleased to see that water efficiency standards are going to be used when building new housing in policy H4 and for all other developments in policy CC2. Please can you clarify whether you are using the 110l/h/d standard which is what we recommend in light of the water resources issues within the Thames Water supply region. We recommend that you add this number (110l/h/d) into the document in the supporting text to make it clearer rather than just referring to the building regulations.</p> <p>The Environment Agency has undertaken an assessment of water stress across the UK. This assessment has classified the Thames Water supply region as an area of "serious" water stress. This translates to higher water demands with limited water availability (i.e water in the ground and surface water). Please use the following link to the document 'Water stressed areas - final classification'.</p> <p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf</p>	<p>Agreed. Change proposed. The 110 litres per person per day standard should be referred to in the supporting text.</p>
Veronica Leeke	H4: Standards for New Housing	<p>I applaud the condition in H4(d) that 'all major new-build residential development should be designed to achieve zero carbon homes'.</p>	<p>Noted. No change needed.</p>
McKay Securities PLC	H4: Standards for New Housing and CR6: Living in Central Reading	<p>Policy H4 needs to be read in conjunction with policy CR6 'Living in Central Reading' and should provide some commentary to this effect. Without this, it will be unclear to readers that there is additional policy dealing with housing which needs to be taken into consideration, or how these policies work in conjunction with one another.</p>	<p>Agreed. Change proposed. There should be a cross reference to CR6 in the supporting text.</p>
Persimmon Homes	H4: Standards for New Housing	<p>The introduction of this policy will limit the densities at which developments could be built at. It is acknowledged in the Local Plan that Reading is a heavily constrained authority and that available land is scarce. In order to maximise the available land and deliver sufficient housing to go towards the Reading housing needs then developments built at high density may be required.</p>	<p>No change proposed. High density development will continue to be developed in Reading, in particular in the town centre, where this element</p>

		In order to achieve this there should be flexibility with regards to the housing standards and in this case it could not be supported for Reading to adopt the National Space Standards as this would have significantly detrimental impact on the ability of the Borough to deliver on their housing needs.	of the policy will not apply. Meeting housing needs should not be at the expense of the quality of the housing that is to be delivered, however. It should further be noted that the SHMA makes clear that a significant proportion of the need is for family housing.
Reading Friends of the Earth	H4: Standards for New Housing	What is required is very high levels of insulation and air tightness coupled with ventilation with heat recovery and appropriate low-carbon heating either by district heating or heat-pumps. Solar PV and electricity storage should be incorporated where possible.	No change proposed. The policy seeks simple standards that can be applied consistently, rather than seeking to specifically define the exact specifications of new developments. The direction of national policy does not support additional standards for new housing, and so where they are proposed they will need to be robustly justified.
Reading Friends of the Earth	H4: Standards for New Housing	c) Emission rate - proposed 19% improvement in on 2013 Building Regulations is not enough. New build should be to a robust low energy standard for example PassiveHaus standard.	No change proposed. Policy needs to strike a fine balance between measures to improve sustainability and avoiding placing burdens that stifle development.
Reading Friends of the Earth	H4: Standards for New Housing	d) 'Zero Carbon Homes' requires definition - it does not necessarily mean what would be inferred from the words - proposed standard was watered down and then dropped by the government. What it probably means is that new housing may contribute to off-site low-carbon energy generation to reduce its carbon footprint.	Agreed. Change proposed. The policy should clarify what meeting the zero carbon requirement would involve.
Reading Friends of the Earth	H4: Standards for New Housing	Lifetime carbon emissions - including both embodied and use-phase carbon - should be assessed using the emerging RICS Whole-Life Carbon Professional Statement method to ensure that the best design choices are being made to minimise climate impacts.	No change proposed. The direction of national policy does not support additional standards for new housing, and so where they are proposed they will need to be robustly justified.
Reading Friends of the Earth	H4: Standards for New Housing	All new housing should be developed with the needs of less-able elderly people in mind - wheelchair access, lifts, toilet facilities etc. people shouldn't have to move when they become old or ill.	No change proposed. The policy proposes that all new build housing be designed to be accessible and adaptable for this reason.
Reading Urban Wildlife Group	H4: Standards for New Housing	Please define "zero carbon " housing. In particular to exclude the potential to offset carbon emissions from new development with, for example, tree planting elsewhere or retrofitting old housing stock with insulation. The new houses should themselves be zero carbon.	Agreed. Change proposed. The policy should clarify what meeting the zero carbon requirement would involve.

Reading Urban Wildlife Group	H4: Standards for New Housing	We think that a higher proportion of new housing should be wheelchair access, even if this means a new definition by the council for "low mobility access" including level flooring, wider doors throughout, storage for mobility scooters (or bicycles). More housing stock should be suitable for a range of ages.	No change proposed. This would have to be supported by robust evidence. At this stage, it is considered that housing should be capable of adaptation to meet these needs.
Ropemaker Properties Ltd	H4: Standards for New Housing	It is understood and appreciated why Reading are seeking to reduce emission rates and achieve zero carbon homes. Whilst it is noted that many of the proposals set out fall within buildings regulations, the increase in requirements could be overly onerous and make a development potentially unviable. This policy should therefore have some inbuilt flexibility for developers having regard to viability and site constraints.	No change proposed. It is not considered that these standards should make a development unviable. In the exceptional event that it does, this will be a material consideration in applying the policy.
University of Reading	H4: Standards for New Housing	Many of the requirements of this draft policy duplicate already covered Building Regulations legislation. We consider it unnecessary to include a policy which includes building standards that construction projects would be subject to through other legislation. Further, the draft policy is extremely prescriptive in its application of current Building Regulations which may not be the latest standards through the Plan period. It is our recommendation that draft Policy H4 is deleted.	No change proposed. The various requirements of the Building Regulations referenced in the policy cannot be implemented without a Local Plan policy that 'opts in' to them. This is not therefore duplication. The supporting text should clarify that where references to the Regulations change, the policy should be taken to refer to the most up to date position, but this would certainly not justify the deletion of the policy.
Bracknell Forest Borough Council	H5: Accommodation for Vulnerable People	The intention to provide at least 253 residential care spaces in C2 use in addition to the overall housing need is welcomed. This appears to meet the need for Reading Borough, as identified in the SHMA.	Noted. No change proposed.
Reading Friends of the Earth	H5: Accommodation for Vulnerable People	iii) 400m seems too far for older people and people with physical disabilities.	No change needed. It is considered that 400m is appropriate. In an ideal world, developments catering to people with limited mobility should clearly be located as close to facilities and bus stops as possible, but in reality a lower distance could well prevent sufficient developments coming forward due to the limited supply of sites.
CAAC with comments and	Paragraph 4.4.42	Add " <i>Consideration would be given in Conservation Areas to the reversion of residential conversions to their original use e.g. retail in order to enhance and preserve the special</i>	Partially agreed. Change proposed. This would need to be considered on a

support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG		<i>character of the area.</i> "	case-by-case basis, but the supporting text can indicate that there may be instances where a use may change that would be more appropriate to the significance of a heritage asset.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	H7: Residential Conversions	Add bullet point " <i>can be shown not to negatively impact the special character of conservation areas.</i> "	No change proposed. There are existing policies dealing with the character of conservation areas which will be applied. The Local Plan seeks to avoid unnecessary repetition.
		'Adequate internal floorspace and headroom' needs to be defined.	Partially agree. Floorspace and headroom guidance can be found in the SPD. Footnotes should be added.
		'Sufficient communal space' needs to be defined, otherwise this requirement is useless.	Partially agree. Communal space guidance can be found in the SPD. Footnotes should be added.
		Add the following to boxed text in first paragraph: "Conditions will be placed on the management of HMOs which are designed to ensure that landlords and tenants are aware of their obligations to maintain external communal areas and gardens and abide by RBC waste management policies." This reflects an informative PAC ruling set out in February as urged by Tony Page.	Partially agree. This should be added to the supporting text in an effort to keep the policy concise.
Historic England	H7: Residential Conversions	We 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 the NPPF, particularly as the Plan does not contain a specific policy to guide development affecting listed buildings. We would also welcome the requirement that the proposal makes a positive contribution to the character of the area in terms of the arrangement of doors, windows and other principal architectural features and their rhythm between buildings, as in Policy H10.	Agree. Changes proposed. This text should be added to the policy.
Veronica Leeke	H7: Residential Conversions	It is disappointing that the Local Plan does not appear to impose similar retrofit standards in H7 as the previously quoted BREEAM standards, particularly on larger developments.	Partially agreed. Change proposed. Policy CC2 should be amended to add reference to BREEAM standards for conversions, which reflects existing policy albeit with a more ambitious expectation in line with non-residential
Reading Urban Wildlife Group	H7: Residential Conversions	Conversions should include an upgrade in energy efficiency of the building	
Reading Friends of the Earth	H7: Residential Conversions	Should aim to achieve similar standards of energy efficiency and carbon emissions as new build.	
CAAC with comments and support of RCS,	Paragraph 4.4.49	This must be strengthened. "The Council <i>will</i> introduce an Article 4 direction..."	Do not agree. Due to resource constraints, each area must be considered on a case-by-case basis.

CADRA, BSANA, BTCA, KCA and the Redlands NAG			
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.4.50	How can we re-establish healthy mixes?	Noted. No change needed. This policy intends to address this issue. The Council intends to support the reversion of HMOs to single family homes, where appropriate. However, planning policy has limited ability to change the existing situation.
Historic England	H8: House Extensions and Ancillary Accommodation	We would welcome the addition of a requirement 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 the NPPF, particularly as the Plan does not contain a specific policy to guide development affecting listed buildings. We would also welcome the requirement that the proposal makes a positive contribution to the character of the area in terms of the arrangement of doors, windows and other principal architectural features and their rhythm between buildings, as in Policy H10.	Partially agreed. Change proposed. The Local Plan seeks to avoid the duplication of policy, and it is better that applicants are directed to the full heritage policy. The supporting text should be amended to cross refer to relevant policies. The relevant clauses on architectural features etc should be included in the policy, albeit that the emphasis should be slightly different from H10 as only one building as opposed to several are affected.
Natural England	H8: House Extensions and Ancillary Accommodation	Extra dot point please "• No loss of biodiversity were building is proposed on back gardens"	Agreed. Change proposed. A corresponding clause should be added to the policy.
Reading Friends of the Earth	H8: House Extensions and Ancillary Accommodation	Should aim to achieve similar standards of energy efficiency and carbon emissions as new build.	No change proposed. It is not considered proportionate to expect householder applicants to meet the same standards as for major developments. The general policy statements in CC2 apply to all forms of development.
CAAC with comments and	Paragraph 4.4.61	Edit to reflect that "rear extensions may also be visible to the general public from a road or walkway."	Agreed. Change proposed. This should be reflected in the supporting

support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG			text.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	H10: Development of Private Residential Gardens	An overall strategic plan for neighbourhood/streets needs to be put in place to prevent multiple developments on gardens whose cumulative effect is damaging to the character of that neighbourhood/street.	No change proposed. It is not clear what a strategic plan would add to the policy. The policy already requires that any effect on character is positive.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	H10: Development of Private Residential Gardens	Point 4 needs a clarification/definition of what is regarded as unacceptable. Is obscuration of sightlines taken into consideration?	Change proposed. It is agreed that this reference is confusing. It is intended to state that tandem development itself is unacceptable, rather than seeking to distinguish between acceptable and unacceptable development. Deleting the reference would clarify the matter.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	H10: Development of Private Residential Gardens	Does this policy make reference to architectural quality? If not, it should be included.	No change proposed. The policy does not make specific reference to the term 'architectural quality', but the relevant elements of that are included within the policy, particularly in criterion 1.
Caversham and District Residents' Association	H10: Development of Private Residential Gardens	<p>The policy and supporting statements on development in residential gardens must be strong enough to resist applications which will claim to be providing 'sustainable' development. It will be of overriding importance to ensure that the character of an area and the way it functions will not be compromised - para 4.4.74 - and we would like to see this included in the policy.</p> <p>A policy should be required which ensures that a number of residential garden developments cannot be located close together.</p>	<p>No change proposed. The purpose of the policy is already to ensure that such developments do not negatively affect the character and function of an area. It is not clear how it should be strengthened.</p> <p>A blanket restriction on residential garden developments in close proximity could not be justified on the evidence. Schemes should be considered on their merits, with</p>

			reference to any specific harm that they cause.
Historic England	H10: Development of Private Residential Gardens	We welcome the requirement that the proposal makes a positive contribution to the character of the area in terms of the arrangement of doors, windows and other principal architectural features and their rhythm between buildings, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF, although we find it odd that a similar requirement is not included in Policies H7 and H8.	Partially agreed. Change proposed. The relevant clauses on architectural features etc should be included in the policy on house extensions albeit that the emphasis should be slightly different from H10 as only one building as opposed to several are affected. However, in terms of residential conversions, these do not usually result in major changes to the external appearance, and inclusion of these criteria is not necessary. General design and heritage policies will apply in any case.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.4.73	Why are 1) to 4) excluded?	No change proposed. These developments are excluded either because they are covered by other policies or because they would have no effect on residential gardens.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.4.74	This policy should be strengthened to avoid manipulation of the sustainability of this sort of development to override the impact on character of an area.	No change proposed. The purpose of the policy is already to ensure that such developments do not negatively affect the character and function of an area. It is not clear how it should be strengthened.
Bob O'Neill	H11: Student Accommodation	I do not see it as being a plausible demand to build student accommodation in the core of the town centre. There are no university or college buildings there and it seems a misuse of the loop hole to avoid tax. I have grave doubts whether students will pay £400 per week for a one room in the town centre. I assume that the council has a means to assess whether the landlords are being honest as to who is living in them.	Noted. No change proposed. The policy seeks to ensure that the priority for such sites is to meet general housing needs.
Bob O'Neill	H11: Student Accommodation	Why are you concerned so much about student accommodation? Half Reading University is in Wokingham and they then have to carry more of the burden. Reading University should take more responsibility for the specific housing and pastoral needs of its students. That is how it was. What they have done is tantamount to offloading the problems onto RBC/WBC.	No change proposed. Reading University straddles the boundary, and is clearly a significant planning issue for both Reading Borough Council and

			Wokingham Borough Council.
John Wilkins	H11: Student Accommodation	I am concerned that RBC want to effectively prohibit more student living accommodation in central Reading. I have been pleased to see empty office blocks re-used for students. Surely a more balanced approach would be sensible involving use of Whiteknights and town areas. The University needs to be integrated not segregated from the town. Of course Whiteknights straddles the Reading/Wokingham boundary but hopefully this should not prevent a sensible integrated approach.	No change proposed. It is agreed that the University needs to be an integral part of the town, but this will also involve addressing issues where they arise. Some redundant office blocks have come into active use for student accommodation, but this has also been the case for general housing. The pressing housing need will mean that redundant offices can continue to come into use as housing even if not for students.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	Paragraph 4.4.83	Add <i>“Even within this presumption the impact of expansion of existing halls of residence on the character and amenities of an area will be a consideration.”</i>	Agreed. Change proposed. The overall thrust of this point should be recognised in the text.
Basingstoke and Deane Borough Council	H12: Provision for Gypsies and Travellers	BDDB support Reading Borough Council’s intentions to undertake a Gypsy and Traveller Needs Assessment to inform their need for pitches. The Local Plan should provide sufficient gypsy and traveller accommodation to meet Reading Borough’s full needs. The Council would be happy to engage in any cross-boundary discussions necessary to produce this study.	Noted. No change proposed. The GTAA has now been produced, and BFBC have provided comments on it. The Council has thoroughly assessed the potential for provision in Reading, and is bringing forward a proposed transit site. Meeting permanent needs within the Borough boundary will not be achievable, and the Council therefore continues to work with neighbouring authorities to address this issue.
Bracknell Forest Borough Council	H12: Provision for Gypsies and Travellers	It is noted that Reading Borough Council is still awaiting the results of its Gypsy and Traveller Accommodation Assessment (GTAA) but that it is anticipated that there will be a need to provide further pitches. Concern is also expressed about transit site provision in view of the reference to unauthorised encampments. Bracknell Forest Council would like the opportunity to comment on the evidence base, particularly if need cannot be accommodated in the Borough.	Noted. No change proposed. The GTAA has now been produced, and BFBC have provided comments on it.
Environment Agency	H12: Provision for Gypsies and	Please be aware that caravans, mobile homes and park homes for permanent residential use of development falls within the ‘highly vulnerable’ category. Highly vulnerable development within	Agreed. Change proposed. This should be highlighted in the policy.

	Travellers	Flood Zones 3a and 3b should not be permitted and this would raise a policy objection at the planning application stage. So when looking at site allocations for gypsy and travellers sites the sequential test still applies in Flood Zone 2 but would not be appropriate in Flood Zones 3a or 3b as these are highly vulnerable developments. The issue of flood risk should be included within this policy in order to make it consistent with National Planning Policy.	
Historic England	H12: Provision for Gypsies and Travellers	We would welcome the addition of a criterion "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 the NPPF.	Agreed. Change proposed. This criterion should be added.
Natural England	H12: Provision for Gypsies and Travellers	Is there a definition of what constitutes 'important' trees and wildlife? Remove the word 'important' OR replace vi) with "Not result in the loss of biodiversity and wherever possible result in a net gain".	Agreed. Change proposed. This criterion should be amended.
South Oxfordshire District Council	H12: Provision for Gypsies and Travellers	We consider that a site should be identified to address needs arising in the GTAA and that the site should be provided in the area where the need arises. We agree with national policy that requires the local authority where the need arises to meet that need, unless there are exceptional reasons why it should not. If a site cannot be found, we note your intent to resolve the issue with neighbouring authorities through the duty to co-operate. We are happy to establish an open dialogue regarding the results of your Gypsy and Traveller Accommodation Assessment.	Noted. The Local Plan will be updated to show the latest position. The Council has thoroughly assessed options for accommodating needs within its own area, but there are no sites that are suitable and available. The Local Plan should recognise the need to consider this issue in conjunction with neighbouring authorities.
Evelyn Williams	H12: Provision for Gypsies and Travellers	The potential for a marina on the Kennet is noted but the needs of the narrowboat community are not sufficiently addressed in the Draft Local Plan.	No change proposed. The Gypsy and Traveller Accommodation Assessment (GTAA) looked at this issue but did not identify a need for additional residential moorings.
Wokingham Borough Council	H12: Provision for Gypsies and Travellers	Wokingham Borough Council expresses concern that a Draft Plan has been published when there is no available need assessment regarding this key issue and therefore no evidence from which a strategy for meeting need can be devised. Instead, the Draft Plan states that it is Reading Borough Council's intention to address the issue of Gypsy and Traveller and Travelling Showpeople need before the Pre-Submission Draft Local Plan (expected later in 2017) at which time the GTAA will be available. National policy sets out that local authorities should seek to meet any identified need unless there are exceptional reasons why it should not. Given it is Reading Council's understanding that there will be an identified need, Wokingham Borough Council expects Reading to have already begun work to identify potential sites for Gypsies and Travellers within its own borough boundary. Once the required need is fully known, Wokingham Borough Council emphasises that	No change proposed. A Gypsy and Traveller Accommodation Assessment (GTAA) has now been published, which identifies a need for sites. The Council has thoroughly assessed the potential for provision in Reading, and is bringing forward a proposed transit site. Meeting permanent needs within the Borough boundary will not be achievable, and the Council therefore continues to work with neighbouring authorities to address this issue.

		Reading Borough Council should seek to meet this in full. Duty to co-operate discussions concerning meeting any potential unmet need should only occur if there is clear and robust evidence that the need cannot be met within Reading's own administrative area. Should this transpire engagement should occur with local authorities across the HMA. At the current time, in the absence of a needs assessment and associated strategy to meet any identified need, Wokingham cannot support this aspect of the plan and further work is required from Reading Borough Council.	
T J Cook	4.5: Transport	Looking at overhead pedestrian crossings at busy parts of Reading's Roads; similar at the roundabout at Twyford/Wargrave roundabout on the A4; rather than putting zebra crossings or traffic lights on the road; that disrupts traffic flow.	No change proposed. There are instances where this may be appropriate (e.g. A33 near Island Road), but it is mostly not proposed in the Local Plan.
T J Cook	4.5: Transport	Traffic Lights recalibration when was this last time this was carried out on major roads, during commute times?	No change proposed. This is not a matter for the Local Plan.
T J Cook	4.5: Transport	Why doesn't Junction 11 and 12 have red-light and box cameras to prevent people over-crowding the junction blocking other lanes from moving, Please inform the Highways Agency of this matter with urgency.	No change proposed. This is not a matter for the Local Plan.
T J Cook	4.5: Transport	Tesco Depot is allowing lorries to add to congestion in the early morning commute, did Reading Borough not think about this issue, if not why not?	No change proposed. A Travel Plan for this development was agreed as part of the S106 agreement.
T J Cook	4.5: Transport	Oxford Road has too many traffic lights, and need to restrict pedestrian crossing to set section for safety and traffic flow.	No change proposed. The Local Plan does not propose to reduce the number of traffic lights on Oxford Road.
T J Cook	4.5: Transport	Junction of Oxford Road, Tilehurst Road and Russell Street, there is filter lane which after this road junction into ... is being used for people to jump lanes or other cars in the left-hand lane, so causing congestion. Block this lane with road island after left-hand turning into	No change proposed. This is a matter for the Highways section of the Council.
T J Cook	4.5: Transport	The traffic jams and congestion has got to a point where it is preventing growth in Reading. I believe that fuzzy logic traffic lights with cascading effects of traffic lights in a row would help reduce the congestion. The cascading affect is you have three traffic lights in proximity say one-thousand metres or more, that the green lights start at the different times from the first traffic light to allow a continuous flow of traffic, so traffic light starts, then next traffic is delayed by 15 seconds, and then further one's continue. The result is that traffic is passing on green-light route and is not held up.	No change proposed. This is not a matter for the Local Plan.
T J Cook	4.5: Transport	I believe that from Green-Park we could start to think of aerial cycle paths, much talked about in London but never implemented. There are many pavements that are extra wide that could be adopted for cycle paths, e.g., Vastern Road.	No change proposed. The Local Plan proposes improvements to cycling facilities, but it is not clear that aerial cycle paths are appropriate or

			deliverable.
T J Cook	4.5: Transport	I would like to see as part of the traffic management reports more on congestion and traffic queue in and around Reading which most residents would be interested to see how the council is looking at this challenge?	No change proposed. This is a matter which the Council is seeking to address through its transport strategy. The most recent Local Transport Plan is available on our website.
Chris Hillcoat	4.5: Transport	<p>Many of Reading's roads suffer from severe congestion and peak times. When a road is nearly full, a small increase in flow can lead to a large increase in delay. Much of the town and surrounding area now faces this tipping point, as the pace of development overtakes the capacity of the road network. The future growth of the town which you predict will require significant increases in transport connectivity and capacity in order to maintain the economic and social success in Reading.</p> <p>I would like to comment on the need to provide for freight and general traffic movements on the road network, and the need for safe and effective cycling. I have found from professional experience that finding space for segregated cycling in urban areas can be very challenging. This leads me to believe that sometimes it is necessary to create more strategic road capacity in order to free up space for a strategic cycle network.</p>	No change proposed. Options for creation of more strategic road capacity in Reading are very limited. A proposed network of cycle routes across the Borough is proposed in line with the Cycling Strategy.
Oxfordshire County Council	4.5: Transport	There does not appear to be a policy on walking, although the IDP refers to a Walking Strategy to encourage active travel and promote an alternative to car use. Walking (as well as cycling) is integral in achieving sustainable Door to Door journeys for example walking to/from a bus stop or rail station. This can play an important role in ensuring local and longer distance trips (such as those made from Reading into Oxfordshire) can be made sustainably and not add to the pressure on the existing transport network.	Partially agreed. Change proposed. It is agreed that walking is an essential part of sustainable and active travel. As such, it is covered in policy TR1. It is not considered that a separate policy will add value, but additional text on walking is proposed to be added.
Green Park Reading No.1 LLP	TR1: Achieving the Transport Strategy	Whilst GPR agrees with the main objective of proposed development contributing appropriately to meeting transport plan aspirations, as with the response to Policy CC9, reference should be made in the text to recognising where previous significant contributions have been made which have helped achieve these long term policy objectives. New contributions sought from development which has already made such contributions should be based on new or uplift in floorspace and not that which has already been accounted for in road network capacity.	Agreed. Change proposed. The supporting text should be amended to recognise that consideration of impact should take account of what has already been permitted and, potentially, mitigated.
Greater London Authority	TR1: Achieving the Transport Strategy	From a transport perspective, we refer to the capacity improvements and related opportunities arising from the Great Western Mainline, Western Access to Heathrow, and Crossrail set out in our response to your Issues and Option draft. We welcome the reference to the Crossrail Safeguarding Direction in 4.5.10. It will be important to liaise closely with Transport for London on taking proposals for individual sites forward.	Noted. No change proposed.
Green Park Reading No.1	TR1: Achieving the Transport Strategy	GPR would also encourage Reading Borough Council to ensure there is a clear mechanism for capturing transport contributions from other uses for sites not allocated in Plan in south Reading,	No change proposed. Transport contributions will be captured through

LLP		either through CIL or a clear s106 framework.	CIL unless there are specific site-related issues that require mitigation.
Highways England	TR1: Achieving the Transport Strategy	Highways England is supportive of this policy, which will minimise potential impacts in line with NPPF and Circular 02/2013.	Noted. No change needed.
McKay Securities PLC	TR1: Achieving the Transport Strategy	This policy is repetitive and unnecessarily detailed, making it harder to understand and implement on a consistent basis. The third final point is irrelevant and the content is covered by the requirement for Transport Assessments. The following should be deleted from this policy: "All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application."	No change proposed. It is not agreed that this policy is either detailed or repetitive. The suggested change involves deletion of the final paragraph, which is the only reference the policy makes to transport assessments.
Reading Friends of the Earth	TR1: Achieving the Transport Strategy	Larger developments should be permeable for pedestrians and cyclists but not for general vehicles.	No change proposed. This will depend on the specific development proposal.
Reading Urban Wildlife Group	TR1: Achieving the Transport Strategy	Major housing developments should restrict through routes for vehicles within the estate and increase connecting cycle routes/pedestrian routes or bus routes	The largest developments are the Major Opportunity Areas, and the maps for these development show pedestrian and cycle permeability and vehicle access.
Reading Friends of the Earth	TR1: Achieving the Transport Strategy	Public transport priority should be designed-in to bring down walking distances and to provide suitable waiting facilities.	Noted. The policies in the transport chapter emphasise the need to build public transport accessibility in, although it is not possible to be prescriptive about this in every case.
Reading Friends of the Earth	TR1: Achieving the Transport Strategy	Residential areas should promote park-and-ride and bike-and-ride by provision of appropriate car and cycle parking for key bus-routes.	No change proposed. Park and ride is best dealt with at specific planned points rather than encouraging trips into residential areas.
Natural England	Paragraph 4.5.5	Will Section 106 be used to maintain/upgrade the cycle network? Add if appropriate.	Agreed. Change proposed. This should be reflected in the text.
Bracknell Forest Borough Council	TR2: Major Transport Projects	Bracknell Forest Council is supportive of Policy TR2 with regards to its identification of the National Cycle Network Route 422, which will link Newbury to Windsor, including parts of Bracknell Forest.	Noted. No change needed.
T J Cook	TR2: Major Transport Projects	I see Reading has made no progress on Cow's Lane?	No change proposed. The Cow Lane project is expected to be completed early in the plan period.
Green Park Reading No.1 LLP	TR2: Major Transport Projects	GPR requests that, as far as possible, MRT does not use the existing road network.	No change proposed. There will need to be a mix of use of existing roads and new dedicated space.
Chris Hillcoat	TR2: Major	Third Bridge plus Caversham bypass from A4155 to A4074 - Taken at a strategic level it would be	Noted. No change proposed. Any

	Transport Projects	possible to accommodate large levels of housing growth in this area, as well as free central Reading and Caversham from N-S through traffic and speed up people's journeys in the wider area. The release of capacity in Lower Caversham could allow for more bus priority and/or segregated cycling provision.	additional crossing of the Thames is required to address existing issues rather than lead to further levels of development above what is planned. However, it could lead to some increased public transport priority on existing bridges.
Chris Hillcoat	TR2: Major Transport Projects	<p>Newtown relief road - The bottleneck on the three lane section of London Road between Cemetery Junction and the A3290, with only one lane taking traffic out of town, results in substantial delays to people's journeys in both AM and PM peaks and very poor air quality in Newtown. In order to free this bottleneck I can see two possible options:</p> <p>a. Allow eastbound general traffic to use the proposed bus-only link between Napier Road and Thames Valley Park. This would give people two options to exit Reading to the east, and increase resilience as well as reduce journey times and improve air quality. It would not speed up journeys into Reading, which means the level of induced demand would be small. It would not harm the bus priority or bus journey time improvements which are hoped for.</p> <p>b. Construct a new one-way link road for westbound traffic from the Sutton Seeds roundabout, across the very edge of Palmer Park to St Bartholomew's Road at its junction with Wokingham Road. You could then dedicate London Road to eastbound traffic, eliminating the long queues of vehicles wanting to exit Reading to the east. This link road would not require any property acquisition or demolition. Further changes to road layouts at Wokingham Road and Cemetery Junction could be considered.</p>	<p>No change proposed.</p> <p>The Eastern MRT link is proposed for public transport only, and it is not considered to be appropriate for this to be opened up to all vehicles.</p> <p>It is also not appropriate to develop existing important open space at Palmer Park for a road.</p>
Network Rail	TR2: Major Transport Projects	The provision of a station at Greenpark is a long standing proposal therefore its inclusion in Policy TR2 is welcomed as this will safeguard the land where the station is proposed.	Noted. No change needed.
Network Rail	TR2: Major Transport Projects	As noted in the Local Plan both NR and GWR have been in dialogue with the council regarding the proposed Reading West station upgrade and a Master Plan for the station has been produced identifying design options that will support achieving the desired aim of providing "Access for All" facilities to both platforms. NR have no objection to the inclusion of this scheme in Policy TR2 which supports the aims of improving passenger facilities and safeguarding the land required.	Noted. No change needed.
Oxfordshire County Council	TR2: Major Transport Projects	<p>Oxfordshire County Council will continue to participate in the Thames Crossing Working Group. The County Council will want to be satisfied that the need and benefits of any scheme are clearly identified.</p> <p>As identified in Reading's IDP, a new crossing would cost in the region of £100m. Oxfordshire County Council has its own list of strategic transport infrastructure projects needed to support growth in Oxfordshire as set out in the Oxfordshire Local Transport Plan and the emerging</p>	Noted. No change proposed. The joint work on cross Thames travel, including on funding any proposal, is ongoing. This is expected to continue.

		<p>Oxfordshire Infrastructure Strategy. A third Thames crossing at Reading is not currently a priority for Oxfordshire.</p> <p>Initial results of modelling work undertaken for three crossing options indicate that for all three options there is generally a low level traffic impact on the highway network in South Oxfordshire; however, there may be specific local traffic issues, particularly in respect of increased traffic on the B481, arising from drivers diverting from alternative routes. A scheme may bring benefits at existing crossings at Sonning Bridge and Henley, generated by the new bridge attracting traffic that would have previously used these routes. It is noted that these are initial findings and that more evaluation of the modelling work is required, in particular to justify the business case for the scheme.</p> <p>If any proposal for a River Thames crossing is successful in gaining funding, Oxfordshire County Council would expect to be closely involved in the development and design of the scheme and any complementary measures, including full mitigation measures in South Oxfordshire as required.</p>	
Oxfordshire County Council	TR2: Major Transport Projects	<p>Figure 4.8 of the draft Plan indicates the A4155, A4074 and B481 as future Park and Ride corridors, most likely in adjoining authorities, and the Council will continue to work with its neighbours to bring new facilities forward. OCC has not been invited to be a partner in, nor had the opportunity to review work underpinning the Park and Ride proposals for these corridors. Furthermore the draft skeleton plan on which the council commented earlier this year did not refer to the possibility of Park and Ride sites being located within Oxfordshire.</p> <p>Oxfordshire's LTP4 does not propose development of Park and Ride sites to support travel to Reading and it would not be Oxfordshire's priority to acquire land for, fund, develop or maintain new Park and Ride facilities or dedicated bus-based Mass Transit services to Reading. Likewise the emerging Oxfordshire Infrastructure Strategy does not identify Park and Ride for Reading as a priority for infrastructure investment.</p> <p>Reading BC needs to first demonstrate that all reasonable alternative transport options have been fully considered before proposing Park & Ride corridors within Oxfordshire. In the absence of technical information demonstrating that Park and Ride sites supported by Mass Transit services are the most effective, viable and deliverable solution to the town's congestion issues, Oxfordshire County Council objects to references in the plan to Park and Ride sites potentially located within Oxfordshire.</p> <p>The promotion of inter-urban bus services should be considered ahead of further Park and Ride services, as a potentially more sustainable solution than promote car travel along already</p>	<p>No change proposed. The principle of park on ride on these corridors is a longstanding Council ambition. Routes along the A4074 and A4155 corridors were included in the Core Strategy in 2008 and Local Transport Plans 2 (2006), with LTP 3 (2011) referring to park and ride on key routes to the north of Reading. This has not previously been a matter of contention with Oxfordshire County Council.</p> <p>The Draft Local Plan does not propose specific sites, and therefore there is not any detailed technical work on those sites. However, feasibility work was undertaken on these corridors in 2007 on behalf of the Cross Thames Group (which includes Oxfordshire County Council), and OCC has therefore had access to this work.</p> <p>It is not clear why park and ride should</p>

		<p>congested 'A' roads to Park and Ride sites. This approach would build on existing inter urban commercial public transport services.</p> <p>Oxfordshire County Council will work with Reading BC to identify the most appropriate strategy for dealing with congestion on routes from Oxfordshire into Reading, including how the frequency of bus services can be increased and whether bus priority measures could be developed to support the attractiveness of alternative to the car for accessing the town. This work should be undertaken in parallel with work on the third Thames crossing to ensure an integrated approach is taken to resolving congestion issues on the north side of Reading.</p>	<p>be seen as a last resort, or what the alternative options to be assessed would be. The Local Plan refers to inter-urban bus services, and will continue to consider measures to enhance these bus corridors both for inter- and intra-urban services, but this is not realistically likely to be able to resolve transport issues affecting the north of Reading on its own. One of the key measures that would improve bus journey times from the north would be improved crossing of the Thames.</p> <p>It is appreciated that Oxfordshire's LTP4 does not include support for park and ride at the edge of Reading, although its predecessor LTP3 did so. Reading Borough Council expressed concern in 2014 that support for park and ride close to Reading was not proposed to be carried forward. The delivery and funding of any sites would need to be a matter for future discussion.</p>
Reading Friends of the Earth	TR2: Major Transport Projects	It is right to safeguard land for these projects.	Noted. No change needed.
Reading Friends of the Earth	TR2: Major Transport Projects	We are concerned that the proposed Reading East MRT route (and associated P&R in Wokingham) will be very damaging to visual amenity and wildlife and heritage interests. Land should be safeguarded to improve capacity on the A4 between Cemetery Junction and Suttons Seeds.	No change proposed. Visual amenity and wildlife and heritage needs to be balanced with the benefits of improving public transport links. Safeguarding land along the A4, which would presumably involve loss of part of Palmer Park, would be likely to have similar issues.
Reading Friends of the Earth	TR2: Major Transport Projects	We are concerned that the proposed 'additional Thames crossing' will be very damaging to visual amenity and wildlife and heritage interests. Without a Caversham Outer Distributor Road to the Woodcote Road it will be costly and ineffective and will encourage the use of vehicles; with a	No change proposed. Visual amenity and wildlife and heritage needs to be balanced with the benefits of

		Caversham Outer Distributor Road to the Woodcote Road it will be extremely costly and extremely encouraging to the use of vehicles. Even more land should be safeguarded to increase capacity of bus services.	improving public transport links. Much will depend on the design of any crossing, and this will be a matter for the relevant planning authorities.
Reading UK CIC	TR2: Major Transport Projects	We agree with the transport priorities, these again are essential to the successful growth of the economy along with the emphasis on diverting car traffic out of the town centre and encouraging more travel on buses and trains. The vision for Reading 2050 is also one of a town where more people will make more trips along the rivers and canals as well as walking and cycling along the tow paths and banks.	Noted. No change needed.
South Oxfordshire District Council	TR2: Major Transport Projects	<p>Policy TR2 gives priority to the implementation of major transport projects including park and ride sites and a potential additional crossing of the River Thames. Whilst we are aware of Reading's aspirations for progressing further Park and Ride sites surrounding their district from previous liaison meetings, we would note that South Oxfordshire has not yet been consulted on any particular sites or proposals.</p> <p>No specific sites have been identified in the Plan or on the proposals map with regards to these transport projects, however we recognise that these projects have the potential to impact upon South Oxfordshire. The draft Plan explains that you will continue to work with South Oxfordshire District Council to identify measures to either improve the current situation and/or bring new facilities forward, where needed. South Oxfordshire District Council is keen to work with you to understand further and in more detail the specific locations and justification for these major transport projects.</p>	No change proposed. The Local Plan identifies park and ride corridors at this stage, and has not identified specific sites. The Council will continue to work with South Oxfordshire District Council on this matter.
Jan Steele	TR2: Major Transport Projects	Other Transport. Trams. Cheaper off peak rail journeys to London so that using the car doesn't seem like a cheap option. Electric charging points for cars.	Partly agreed. Change proposed. Charging points for electric vehicles should be added. Proposals for mass rapid transit are included in the plan, although this is not expected to include trams. Rail fares are not a matter for the plan.
Jan Steele	TR2: Major Transport Projects	A new bridge - preferably between the A329 and Caversham Park Village.	Noted. No change proposed. TR2 identifies Crossing of the River Thames, and figure 4.8 shows the indicative alignment which is in line with the suggestion.
Thames Valley Berkshire LEP	TR2: Major Transport Projects	We have secured Local Growth Funds to help in the implementation of transport schemes such as Mass Rapid Transit, Green Park Station and National Cycle Network Route 422.	Noted. No change needed.
Trustees of the Phillimore Successors	TR2: Major Transport Projects	The Estate wish to support the proposals for Park and Ride facilities along the A4155, in particular within Policy TR2.	Noted. No change needed.

Settlement			
John Wilkins	TR2: Major Transport Projects	While the plan praises the bus services in Reading I am surprised that no need to improve bus rail interchange is included. This could be achieved by centrally locating bus stops closer to the station. (In other words a central bus station.) It is very difficult for visitors to find the bus stops and use what is a good bus system.	No change proposed. The transport interchanges around Reading station have now been largely delivered. The provision of a central bus station was rejected some time ago.
John Wilkins	TR2: Major Transport Projects	The Napier road transit route is still in the plan. As I understand the position it will be used by a few buses an hour, which looks to be a very poor return for the investment. Surely it could be used for all traffic one way to relieve the grossly congested section of road from Cemetery Junction to the Suttons roundabout. The tail backs at peak times result in a lot of congestion in central Reading.	No change proposed. The East Reading MRT link provides significant public transport benefits to this corridor.
Wokingham Borough Council	TR2: Major Transport Projects	Wokingham Borough welcomes the continued inclusion of cross-boundary Mass Rapid Transit (MRT) routes which are supported by Wokingham's own development plan and Local Transport Plan. The draft indicates a possible MRT route using the A3290 towards Winnersh and Wokingham. At present the draft plan does not show a MRT route using the A4 towards Woodley and beyond and Wokingham Borough would like to work with Reading to further extend the link eastwards. The links along the A4 and A3290 (and beyond onto the A329M) and the development of Park and Ride corridor at Thames Valley Park within Wokingham Borough is supported. These will require on-going co-operation between the two authorities.	Agreed. Change proposed. The Transport Strategy Map should be amended to show potential for MRT to extend along the A3#4 corridor, although this would be within Wokingham Borough.
Wokingham Borough Council	TR2: Major Transport Projects	Opportunities for cycling and walking between the two authorities are extremely important for encouraging the least environmentally damaging form of transport. Partnership across plan areas is extremely important to deliver walking and cycling schemes through development process and excellent examples like NCN 422 are examples of what can be achieved and WBC are supportive of strengthening this process through plan adoption.	Noted. No change proposed. Additional text is proposed to the Local Plan to specifically deal with walking.
Wokingham Borough Council	TR2: Major Transport Projects	Wokingham Borough Council is leading the in on-going dialogue with Reading Borough Council, Oxfordshire County Council, South Oxford District Council and the TV LEP regarding cross-border transport capacity improvements such as the Thames crossing. Additional highways capacity to the east of Reading will alleviate traffic congestion and have economic benefits for the wider region. The Council anticipates continuing to work with Reading Borough and wider authorities on this and other relevant strategic infrastructure planning matters in the future.	Noted. No change needed.
Environment Agency	Paragraph 4.5.8	With regard to the bullet point about the potential crossing of the River Thames, should this be agreed, it must be designed in such a way as to ensure that the river and adjacent lakes are not impacted negatively.	Noted. No change needed. This will need to be factored into the design stage, but the crossing is likely to be outside Reading Borough, so will largely be an issue for the development management authorities.
Transport for London	Paragraph 4.5.10	TfL welcomes the reference to the Crossrail Safeguarding Direction in 4.5.10. It has not been possible to verify the accuracy of the safeguarding limits shown on the proposals map but the intention to consult Crossrail Ltd is welcomed. From 2019 when Elizabeth Line services are fully	Agreed. Change proposed. The text should clarify that consultations as of 2019 will be with TfL.

		operational, consultation regarding any development proposals within the safeguarded area or any other applications likely to affect the operation of Elizabeth Line services should be sent to TfL Planning. Crossrail Ltd only exists to deliver the project and Elizabeth Line operations and any remaining assets that are not transferred to other authorities will be the responsibility of TfL	
Oxfordshire County Council	Paragraph 4.5.11	Oxfordshire County Council welcomes the support Reading BC gives East-West Rail in para 4.5.11 of the draft plan - this rail scheme will provide greater rail connectivity between Reading and other key growth areas, including Oxford Bicester and Milton Keynes.	Noted. No change needed.
Green Park Reading No.1 LLP	TR3: Access, Traffic and Highway-Related Matters	<p>Policy TR3 seems clear in stating that criteria i) to v) need to be addressed. The policy and supporting text seems to reflect current transport planning rationale, and GPR assumes the wording has been drafted to give some flexibility to enable a 'monitor and manage' approach.</p> <p>In overall terms, the draft policy is, therefore, logical in stating that where there are currently safe and freeflowing transport links, then such conditions should not be compromised by intensifying traffic levels from accesses on to the corridor, and/or facilitating localised car trips that could otherwise be made by other alternative modes. GPR, therefore, supports this approach.</p> <p>Paragraph 4.5.14 outlines that where congestion occurs and additional trips are likely to worsen conditions, then the policy suggests transport mitigation should come forward, but not just highway mitigation, which GPR would encourage. GPR also agrees this should be added to the list in TR3 to offer a way forward for potential development to mitigate additional trips on the transport network.</p>	No change needed. Relevant policies such as TR1 and CC9 already deal with transport mitigation measures, and it is not considered that anything should be added to TR3.
Highways England	TR3: Access, Traffic and Highway-Related Matters	Highways England is supportive of this policy, which will minimise potential impacts in line with NPPF and Circular 02/2013.	Noted. No change needed.
Reading Friends of the Earth	TR4: Cycle Routes and Facilities	Strongly support improvement of cycle facilities.	Noted. No change needed.
Reading Friends of the Earth	TR4: Cycle Routes and Facilities	Roads must be made wider so that vehicles can overtake cyclists when traffic is flowing and cyclists can undertake vehicles when traffic is halted at junctions.	No change proposed. Within an existing urban fabric, it is very difficult to widen roads.
Reading Friends of the Earth	TR4: Cycle Routes and Facilities	Provision should be made for more cycle parking both within developments and on-street.	No change proposed. The Local Plan proposes both cycle parking within developments, and enhanced cycle facilities overall.
Reading Friends of the Earth	TR4: Cycle Routes and Facilities	MRT and P&R vehicles should have provision to carry bikes.	No change proposed. Specifications of vehicles is not a matter for the Local Plan.
Reading Friends of the Earth	TR4: Cycle Routes and Facilities	Provision should be made for cycle hire at part of the Reading Station complex.	No change proposed. There is already provision for cycle hire at Reading

			station.
Reading Urban Wildlife Group	TR4: Cycle Routes and Facilities	More secure cycle parking including those with lockers	No change proposed. The design and location of cycle parking is a matter for the Parking Standards and Design SPD.
Reading Urban Wildlife Group	TR4: Cycle Routes and Facilities	Cycle parks to be covered against rain	
Reading Urban Wildlife Group	TR4: Cycle Routes and Facilities	Cycle parking in the front of shops etc with car parking at the rear to reduce potential vandalism	
Reading Urban Wildlife Group	TR4: Cycle Routes and Facilities	Important to enable cycles to travel on proposed mass rapid transport into the centre of town or to have safe cycle parks at the terminus	No change proposed. Development will be expected to provide for cyclists, and this will include development for transport facilities.
Jan Steele	TR4: Cycle Routes and Facilities	Good quality cycle routes throughout the town with priority given to cyclists at junctions, blindspots, traffic lights, etc. Reading is still very far behind London.	No change proposed. Policy TR2 sets out to improve routes and facilities for cyclists.
Green Park Reading No.1 LLP	TR5: Car and Cycle Parking	This Policy concisely provides the right message and aligns to the right approach to determine car (and cycle) parking, especially when also taking into account the subsequent para 4.5.23 which expands the point well in terms of striking the right balance. GPR, therefore, supports this policy as worded.	Noted. No change needed.
Reading Friends of the Earth	TR5: Car and Cycle Parking	Support provision of cycle parking within developments.	Noted. No change needed.
Reading Friends of the Earth	TR5: Car and Cycle Parking	Vehicle parking should be extremely limited in town centre locations.	Noted. No change needed. This is already addressed by the Parking SPD.
Reading Friends of the Earth	TR5: Car and Cycle Parking	Where on-street parking is permitted in residential areas residents should have defined spaces and be permitted to install electric vehicle charging points.	No change proposed. Measures for electric vehicle charging will be included within TR5, although this will be off-street.
Hammerson Plc	4.6: Retail, Leisure and Culture	It should also be recognised 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.	Agreed. Change proposed. Paragraph 4.6.2 should be amended to reflect this.
Reading UK CIC	4.6: Retail, Leisure and Culture	Reading is a regional retail centre and it is above all important that the local plan allows growth and flexibility between retail, leisure and cultural uses in the town centre to maintain it as a vibrant centre and protect it against competition from the new retail provision in the centres of Bracknell and Oxford.	Noted. No change proposed.
Mr J S Mangat	RL1: Network and Hierarchy of Centres	Overall I support the RL1: Network and Hierarchy of Centres, and in particular the designation of Erleigh Road as a local centre. I welcome the fact that the council is committed to supporting the vitality and viability of these centres and the local businesses and I also support the designated boundary as shown on proposal map R.	Noted. No change proposed.
Natural England	RL1: Network and Hierarchy of	Areas of green space in any built up area should be maintained and enhanced so that they become an important part of the local centre.	No change proposed. Such spaces will generally be retained and enhanced,

	Centres	Suggested change: "The vitality and viability of these centres should be maintained and enhanced. Some centres are based around a small area of green, these will be retained and where possible enhanced."	but there are centres where retention of existing green areas in their current form may not provide the best solution in terms of serving the local community, and more useable open space elsewhere may be a better solution.
Reading Friends of the Earth	RL1: Network and Hierarchy of Centres	Strongly support maintenance and enhancement of centres outside central Reading to reduce demand for transportation and to enhance community cohesion.	Noted. No change proposed.
Bracknell Forest Borough Council	RL2: Scale and Location of Retail, Leisure and Culture Development	It isn't clear whether the retail floorspace quoted in Policy RL2 is net or gross or how the figure of 44,600 sqm has been arrived at, given the overall need set out in the Western Berkshire Retail and Commercial Leisure Assessment 2016.	The figure of 44,600 sq m came from an early working version of the document. The correct figure is now 34,900 sq m, and it is agreed that this should be changed, with related changes to the supporting text.
Slough Borough Council	RL2: Scale and Location of Retail, Leisure and Culture Development	Slough Borough Council should not object to the additional retail floor space being developed as majority of this is committed development that helps support the regeneration of Reading town centre, around the train station, edge of town and district centres.	Noted. No change proposed.
Mr J S Mangat	RL3: Vitality and Viability of Smaller Centres	I am somewhat confused by the bullet points in part a) of the policy and this remains after reading paragraphs 4.6.17. Erleigh Road local centre has five separate prime shop front areas but Finns, the Garage, letting agent and barbers shop have been excluded - why? Do the consecutive units in the policy wording include those on the other side of the road or do the units need to be physically next to each other?	Erleigh Road is a very fragmented centre, and there are residential frontages that break up the frontage. This is the reason for the separate elements, but as para 4.6.17 states, it should be treated as a single frontage even where there is no physical join. Not every shopfront in every centre is part of the key frontage. A view must be taken as to how important each is. In the case of the units identified, Finns and the barbers shop are on side streets rather than the main frontage and the garage is not a centre use in any case.
Green Park Reading No.1 LLP	Paragraph 4.6.16	GPR recognises the need to differentiate between in centre and non centre uses, reflective of the NPPF definitions, in relation to protect uses in district and local centres. It would be helpful if paragraph 4.6.16 could recognise that some in centre uses may be appropriate as ancillary or 'community' uses to support business and employment development, subject to the sequential	No change proposed. The principle that some uses may be appropriate elsewhere on an ancillary basis is accepted. However, this paragraph is

		test.	not the place to deal with the issue as it is referring to how applications within centres will be treated. Changes to the Employment chapter are proposed to address the issue.
Mr J S Mangat	Paragraph 4.6.19	I would also welcome the recognition in 4.6.19 that opportunities for expansion of these centres are limited and should be seized. In this respect the primary frontage should not be seen as a limit to development opportunities and this should be reflected in RL3(c) in appropriate circumstances.	Noted. No change proposed. The key frontage does not dictate where new development should be located, it is intended to retain what is already there.
McKay Securities PLC	RL5: Impact of Main Town Centre Uses	Our client is unsure how part of this policy will be applied in practice. Policy RL5 states that ensuring that centres within areas of deprivation are not adversely affected is of particular local importance. This is not a measurable policy requirement as no criteria are given in the policy which makes it hard to implement and to use as a guide to development. In its current form this part of the policy should be removed unless significantly modified to provide a measurable and achievable policy requirement.	Partly agreed. Change proposed. The text should be amended to refer to those centres known to be in areas of deprivation. With this change, the objective is both measurable and achievable.
Campaign for Real Ale - Reading and Mid Berkshire Branch	RL6: Protection of Leisure Facilities and Public Houses	We welcome the recognition in the Plan of the importance of pubs to physical and mental health, quality of life and the Borough's economic success, as well as their role at the heart of a community (para. 4.6.29). We also welcome the presence of a policy that resists the loss of such facilities.	Noted. No change proposed.
Campaign for Real Ale - Reading and Mid Berkshire Branch	RL6: Protection of Leisure Facilities and Public Houses	<p>We are fully supportive of the aims of this policy and the principles behind it. Paragraph 4.6.32 which addresses the tests of need for a facility is particularly welcomed. We however cannot support the policy as currently worded as it does not appear to apply within the Central Area. We understand this to mean the area covered by the Town Centre inset on the policies map, which actually includes significant elements of town centre fringe and adjoining areas as well as the centre itself. Pubs in these areas fulfil just as important a function as those in other parts of the Borough and are just as deserving of protection. For example, the Moderation on Caversham Road is a community pub that is particularly oriented towards serving the needs of local residents and businesses rather than visitors from further afield, yet under this policy would appear to be afforded no protection.</p> <p>As the policy is currently worded we must regretfully object to it as, despite its excellent aims, it does not afford protection to all the Borough's pubs. Instead it draws an arbitrary line around the central area regardless of the role, function or importance of any pub within that area.</p> <p>We request an amendment to the policy wording to remove the words "outside the Central Area" from lines 1 and 6. Were this change to be made then we would be happy to support the policy.</p>	Agreed. Change proposed. It is agreed that the basic principles of RL6 should be applicable across the Borough. In practice, it may be more straightforward to justify the loss of a town centre pub that fulfils no unique role, but the policy tests as set out will establish that. For that reason, references to the policy only applying in the town centre should be deleted, and changes should be made to CR4 and CR5 to ensure that there is no duplication and that cross-references are accurate.
TJ Cook	RL6: Protection of	The abundance of references to public houses in the document is puzzling? If it is a concern, then	No change proposed. Simply reducing

	Leisure Facilities and Public Houses	reduce business rates for them?	business rates, which is in any case not within the remit of the Local Plan, would not be able to necessarily protect important facilities.
Sport England	RL6: Protection of Leisure Facilities and Public Houses	Sport England welcomes the Council's intention to protect leisure and sports facilities outside the central area. Sport England would query, however, what would prevent the loss of sports facilities to other commercial uses within the central area. It may be more appropriate to include a policy in the plan that specifically protects indoor and outdoor sports facilities from loss across the Borough. Sport England is also concerned that the criteria in the policy do not adequately reflect the protection for built sports facilities within paragraph 74 of the NPPF. Sport England therefore objects to this policy as worded and recommends that an amendment is made to the plan to address this point.	Partly agreed. Change proposed. Criteria (a) and (b) are considered to be wholly in line with NPPF paragraph 74. Criterion (c) is the only one that introduces a possible route to loss of a facility that is not in the NPPF. For this reason, it should be clarified that (c) does not apply to sports and recreation facilities.
The Theatres Trust	RL6: Protection of Leisure Facilities and Public Houses	The Theatres Trust supports policy RL6 as it aims to safeguard and promote cultural facilities, reflecting guidance in Para 70 and 156 of the NPPF.	Noted. No change proposed.
Sport England	OU1: New and Existing Community Facilities	<p>Sport England objects to policy OU1 as it relates to School playing fields. Many of the school playing fields in Reading are used by the community outside of school hours. As worded policy OU1 (together with Policy EN8) indicates that schools will be able to expand onto their existing playing field with support from these policies. This does not accord with government policy (paragraph 74) that seeks to protect school and community playing field from development.</p> <p>If it is known that existing playing field is required to support the growth of local schools then specific sites should be allocated and debated through this development plan. Sport England wishes to discuss further with the Council how these policies can be amended to provide adequate protection for playing fields in the Borough. A policy setting out protection for playing fields as set out above may be the best way in which to provide adequate protection.</p>	<p>Change proposed. The policy is not intended to refer to playing fields, which is why it refers to open areas without a specific use. Where there is a specific use, such as playing fields, the policy states that there must be adequate reprovision elsewhere on site. It is agreed that there should be clarification in line with the NPPF.</p> <p>In terms of protecting playing fields generally, the policy in the NPPF is already clear. It is not considered that local policy needs to diverge from the NPPF, and there should be no need to repeat the NPPF.</p>
Historic England	OU3: Telecommunications Development	We would welcome the addition of a criterion "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 the NPPF.	Noted. No change proposed.
CAAC with comments and support of RCS,	OU4: Advertisements	Add the following: <i>"Updated Supplementary Planning Documents guiding the design of advertisements in district centres and conservation areas will be provided and will outline the quality of lettering, materials, vividness of colours and appropriate fonts."</i>	No change proposed. It is considered that what is being sought here is overly prescriptive. Local planning

CADRA, BSANA, BTCA, KCA and the Redlands NAG		<p><i>"In addition to the overall effect on the neighbourhood, district centre or conservation area and in harmony with the character and appearance of the original building. Advertisements will be appropriate within these contexts to ensure a unity of design that enhances areas."</i></p> <p><i>"Where these policy points are not complied with, then enforcement action shall be taken."</i></p> <p>In general, we feel that this entire section needs to be strengthened in relation to the historic environment and needs to be much more specific and not so subjective. A separate paragraph should be considered for advertisement within Conservation Areas and visible from Conservation Areas. SPDs providing specific guidance and considering the creation of 'areas of special control' should be considered for historic environments.</p> <p>Please see Historic England guidance here: http://historicengland.org.uk/advice/hpg/consent/advertisementconsent/ This can and should be suggested for a number of CAs in town. Where an area has an amenity value that requires stricter controls then it may be designated by the local planning authority as an area of special control. The control of advertisements in such areas is much stricter than elsewhere. This may be appropriate for areas of architectural or historic significance, such as Conservation Areas.</p>	<p>authorities may control adverts in terms of amenity and public safety, and must clearly be able to link any requirements back to those two headings. Specific controls on things such as fonts and materials are considered to be unnecessary.</p> <p>The Council is not in a position to commit to the production of a SPD on advertisements, and this will depend on available resources,</p>
Caversham and District Residents' Association	OU4: Advertisements	We feel that policy OU4 should be strengthened by incorporating the intention to manage the type of advertisements that would be allowed - this is dealt with in para 4.7.25.	No change proposed. The wording in 4.7.25 is too detailed for inclusion in the policy, but offers clear guidance on how the policy will be applied.
Caversham and District Residents' Association	OU4: Advertisements	We have a particular concern about the advertisements on older buildings, and those within Conservation Areas and District Centres. Supplementary guidance on the type of advertisements which would be appropriate would be helpful. Materials should be sympathetic with the character of the building. Design, fonts, colours and lighting, if used, should preserve and enhance existing character of the building. Brightly - lit LED signs and the use of vivid or luminous colours should be avoided.	It is considered that the policy provides appropriate high-level policy statements. There may be future scope to produce Supplementary Planning Documents on this or other topics, but this will depend on priorities and resources.
Historic England	OU4: Advertisements	We welcome 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 the NPPF.	Noted. No change proposed.
Reading UK CIC	OU4: Advertisements	In addition we would recommend that the plan seeks to encourage advertising that actively raises the profile and reputation of the town as consistent with the economic plan and vision 2050. This may be in relation to leisure, heritage and cultural events	No change proposed. Unlike for most types of planning control, Regulations for the control of advertisements allow only consideration of amenity and public safety.
CAAC with	Paragraph 4.7.25	This is far from an exhaustive list and should be firmed up by updated or created SPDs outlining	No change needed. It is not intended

comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG		specifics.	to be an exhaustive list.
CAAC with comments and support of RCS, CADRA, BSANA, BTCA, KCA and the Redlands NAG	OU5: Shopfronts and Cash Machines	As above, 'areas of special control' should be created. This doesn't seem like a policy. It seems more like a random list.	No change needed. This is a policy.
Caversham and District Residents' Association	OU5: Shopfronts and Cash Machines	We support the policy for shopfronts and would welcome a statement that where the policy is not complied with enforcement action will be taken. Individual examples of poor shopfronts can start a process where the character of the surrounding area slowly starts to change and deteriorate. For this reason, supplementary guidance on the type of shopfronts that would be appropriate would be helpful, particularly for premises in Conservation Areas and district centres. We are particularly concerned that shopfronts in older and historic buildings should be enhanced by use of materials which are sympathetic with the character of the building, and that the design, fonts, colours and lighting, if used, should preserve and enhance existing character of the building.	No change proposed. The Council has a separate Local Planning Enforcement Plan, which deals with the prioritisation of enforcement action. There may be future scope to produce Supplementary Planning Documents on this or other topics, but this will depend on priorities and resources.
Historic England	OU5: Shopfronts and Cash Machines	We welcome the requirement that "Features that positively contribute to the character of the building and street will be retained and, where possible, restored" and criterion b) as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF. However, we would welcome an additional criterion: "New shopfronts on listed buildings or in Conservation Areas will respect or enhance the building or area, and will respect the key features of the special historic interest;"	Agreed. Change proposed. This should be included as a separate criterion.
Harvey Smith	Area-Specific Sections	There are many references to the need to address issues such as education, health facilities and transport, although the Plan does not set out in any detail how these constraints will be overcome during the proposed period of sizable expansion. This is particularly true of the Site-Specific Policies, where there is nothing to show what is planned to address key local concerns such as roads, schools or medical facilities which are currently inadequate or only just adequate for the current local population. These Policies are specific about the number of new dwellings, but are very general on the other issues which must be addressed before any building should begin (using unhelpful statements such as "In particular, transport, education and healthcare are issues that would need to be addressed in any development"). Failing to show how the Council will actually address these issues before any developments are given the go-ahead is a significant gap in this Draft.	Noted. The Infrastructure Delivery Plan is where the full infrastructure needs are set out, along with proposals for delivery. This is the appropriate way to do this, as individual sites cannot always be linked to a specific piece of infrastructure. It is agreed that there is a need to specifically enhance what the Plan says about education.

Thames Valley Berkshire LEP	Area-Specific Sections	We have shared our business-led Spatial Economic Narrative with you, your Leader and Interim CEO.	Noted. No change needed.
Thames Water	Area-Specific Sections	Site specific comments from a desktop assessments on sewerage/wastewater infrastructure have been provided, but more detailed modelling may be required to refine the requirements. These sites have been assessed on an individual base. Therefore, the impact of multiple sites in the same area coming forward will have a greater impact. The scale, location and time to deliver any required upgrades will be determined after receiving a clearer picture of the location, type and scale of development together with its phasing. Thames Water welcomes the opportunity to work closely with the neighbourhood forum to identify the net increase in wastewater and water supply demand on our infrastructure.	Noted. No change needed.
Evelyn Williams	Area-Specific Sections	It is a little unnerving to see that Katesgrove where I live has been split into three different areas. The area that is of most concern is the West side of Basingstoke Road/Whitley Street. This area: Milman Road, Swainstone Road and Elgar Road etc; has so much in common with the similar turn of the century terraced housing of Alpine Street, West Hill, Hill Street, Francis Street, Waldeck Street etc, that are in the Eastern zone and Henry Street in the Central zone that it should not be split apart in this brutal way which fails to respect the historical integrity of the area. Whitley Street shops is the natural focus for this area not the shops on Basingstoke Road or Christchurch Road which the South Reading 'zone' seems to suggest.	Agreed. Change proposed. The boundary should be reviewed between South and East Reading to reflect this, and Figures 6.1 and 9.1 amended to reflect this.
Ropemaker Properties Ltd	5: Central Reading	The baseline evidence for this section appears to out of date as 5.3.7 seems to refer to the City Centre Framework published in 2002 and updated in 2008, presumably for the Central Area Action Plan together with a number site specific documents. There does not appear to have been any updated work for the new Local Plan. Since this time, there has been significant changes both in planning policy with the introduction of the NPPF and even to the casual observer, the development which has actually taken place in Reading. As a result, there are some significant concerns relating to the policies within this section and the evidence base which supports it.	Not agreed. No change proposed. It is not clear how national policy has changed in a way that renders the City Centre Framework out-of-date. Likewise, the development that has taken place since 2008 in the centre is broadly consistent with the most recent update of the Framework.
Historic England	5.1: Area Context	Paragraphs 5.1.1, 5.1.2 and 5.1.7 - We welcome these paragraphs.	Noted. No change proposed.
Historic England	5.2: Strategy for Central Reading	We welcome key principle i), as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change proposed.
LaSalle Investment Management	5.2: Strategy for Central Reading	LaSalle supports the Council's wider strategy for Central Reading and in particular supports the Council's objectives to significantly improve the wider station area.	Noted. No change proposed.
RBS Pension Trustee Ltd	5.2: Strategy for Central Reading	We support the continued designation of the Forbury Retail Park Phase 2 as forming part of Central Reading. The Site has been developed with the overt support of the Local Planning Authority to provide retail accommodation that complements the traditional commercial premises located within the Primary Shopping Area in Reading Town Centre. It ensures that the town can accommodate and benefit from a comprehensive range of retail operations to meet the requirements of local residents.	Noted. No change proposed.
Reading UK CIC	5.2: Strategy for	We welcome the policies for development and redevelopment of the town centre; provision for	Noted. No change proposed.

	Central Reading	high rise office and residential, small retail units suitable for independents and the upgrade of the public realm is very important. The vision for Reading is as a more vibrant 24 hour city centre with a strong retail, office, residential and cultural/ leisure offer. The policies in this section should all meet this test	
Reading UK CIC	5.2: Strategy for Central Reading	We welcome the extension of the town to the north of the Station as being consistent with the Vision 2050 and would welcome measures to increase development along both banks of the Thames in the town centre between the bridges as well as making provision for a future tunnelling of and grassing over of the IDR.	Noted. No change proposed.
Reading UK CIC	5.2: Strategy for Central Reading	Greater priority to buses and mass rapid transit systems over the car should be the priority in the town centre again as outlined in the 2050 Vision	Noted. No change proposed. The importance of public transport is highlighted in the key principles.
Hammerson Plc	Paragraph 5.2.9	Paragraph 5.2.9 outlines that in terms of retail, Broad Street, The Oracle and Broad Street Mall are currently the hub of retail and whilst this is not expected to change significantly, there is scope to expand this area particularly to the north of the station. Whilst recognising the need to accommodate growth, Hammerson considers that care needs to be taken to maintain a strong, compact retail core rather than dilute the retail offer over a wide area.	Agreed. Change proposed. This should be highlighted within the text.
Historic England	Paragraph 5.2.11	We welcome this paragraph, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF	Noted. No change proposed.
LaSalle Investment Management	Paragraph 5.2.15	It is stated that there is 'undoubted physical capacity within the centre to incorporate a significant level of new development, by efficient use of underused land through carefully developing at higher densities'. LaSalle would support this statement.	Noted. No change proposed.
Aviva Life and Pensions UK Ltd	Figure 5.1	Whilst the principle behind the purpose of the figure is supported, the graphics and the scale of the plan, even when read alongside paragraphs 5.2.11-5.2.4, result in some uncertainties over interpretation. For example, is Forbury Retail Park in its entirety a concentration for retail or is it just the area covered by the circle?	No change proposed. The plan is supposed to be an overall strategy, not a detailed map, and it deliberately does not define precise lines. The overall strategy then filters down into the policies, whereby ER3b (as defined on the Proposals Map) contains potential for retail within the allocation.
Inception Reading Sarl (Moorgarth)	Figure 5.1	Figure 5.1 should be amended so that the areas defined for concentration of retail, offices and leisure fully encompass the whole of the Broad Street Mall and Fountain House site. The site is an important retail, office and leisure hub within central Reading and this should be reflected in the Area Strategy plan.	No change proposed. The plan is supposed to be an overall strategy, not a detailed map, and it deliberately does not define precise lines. The overall strategy then filters down into the policies, whereby the Central Core, Primary Shopping Area, and Office Core (as defined on the Proposals Map) all contain the whole of

			the BSM. In any case, the lines shown on Figure 5.1 already actually do cover the whole BSM & Fountain House.
Aviva Life and Pensions UK Ltd	CR1: Definition of Central Reading	Aviva supports the policy, which seeks to define the Central Area boundary and provide a clear definition for town centre uses. We note in the supporting text (paragraph 5.3.4) that support will be provided for a mix of uses coming forward on sites within the designated area.	Noted. No change proposed.
Historic England	CR2: Design in Central Reading	We welcome attribute d, but we would also welcome a further attribute: "Development will conserve and enhance the historic environment of the centre and the heritage assets therein", as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF	The purpose of this policy is to add central-Reading specific design elements, rather than repeat policy from elsewhere. Conservation of the historic environment and heritage assets is applicable in all locations. However, the text can be amended to further clarify this.
McKay Securities PLC	CR2: Design in Central Reading	It is unclear as to what this policy means by "capable of adaptation over time to meet changing circumstances" as outlined in criteria e. This policy requirement is vague and is not measurable in its current form. This criterion should be removed or re-phrased to provide a measurable, and clear target that developers can adhere to. If such a policy cannot be devised, it should be deleted.	The supporting text in 5.3.8 explains what is meant here. It should be supplemented for greater clarity.
Natural England	CR2: Design in Central Reading	Please re-word; "c. Development should consider and include green infrastructure from the beginning of the design phase, for instance through landscaping, roof gardens, green walls and green/brown roofs to enhance the otherwise very urban environment."	Partially agreed. Change proposed. Wording proposed is slightly different to make it more capable of implementation.
Reading Urban Wildlife Group	CR2: Design in Central Reading	Please include measures to improve or enhance biodiversity. For example, the central area has a number of buildings with swift colonies/nests and new colonies could be introduced into high rise developments quite easily and cheaply	Partially agreed. Change proposed. Design in the centre will also be subject to the biodiversity policy EN12 which addresses the issue generally. However, some mention of swift boxes can be made in the supporting text to CR2.
Historic England	Paragraph 5.3.5	We understand that, on occasion, choices will be necessary between the protection of the historic core and special character of Reading and modern development, but we would prefer to see it more as a symbiosis with modern development combined with the protection of the historic environment to produce a high quality environment with a real sense of place, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Agreed. Change proposed. "Integrating" is a better word in this context than "balancing".
Natural England	Paragraph 5.3.9	Suggested change: "In addition, the use of green and brown roofs or green walls will enhance the biodiversity value of developments in the centre."	Agreed. Change proposed.
Aviva Life and	CR3: Public Realm	We consider an element of flexibility should be introduced into policy CR3i. It could start with	No change proposed. A 1 ha

Pensions UK Ltd	in Central Reading	something like - except in exceptional circumstances....	development in the centre is a very significant scheme. It is entirely appropriate that such sites provide on-site open space.
Environment Agency	CR3: Public Realm in Central Reading	In points iii and iv of this policy, replace "waterways" with 'watercourses'.	Agreed. Change proposed.
Environment Agency	CR3: Public Realm in Central Reading	The first sentence of point iv of this policy should be amended to read: "The design of developments adjacent to a watercourse, including the refurbishment of existing buildings, will be required to enhance the appearance and ecological value of the watercourse...."	Partially agreed. Change proposed. This is already dealt with in policy EN11, and the Local Plan seeks to avoid repeating policy wherever possible, but a cross-reference in the supporting text should highlight this.
Environment Agency	CR3: Public Realm in Central Reading	This policy should cross-refer to policies EN11: Waterspaces and EN12: Biodiversity and the Green Network.	Agreed. Change proposed.
Historic England	CR3: Public Realm in Central Reading	We welcome this policy, but would prefer it to require development design, form and materials, hard landscaping etc to be sensitive to the historic environment, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Agreed. Change proposed. An additional clause should highlight the need for public realm to conserve and enhance the historic environment.
Natural England	CR3: Public Realm in Central Reading	Suggested change: "The provision of water features, trees (including street trees) and other planting, as well as hard landscaping, to create high quality spaces, will be expected"	Partially agreed. Change proposed. It is agreed that 'encouraged' is too weak in this context, but the policy will need to have some flexibility for, e.g, small open areas where not all of the listed features can be accommodated.
Natural England	Paragraph 5.3.11	Suggested change: "Improvements to the public realm may include works such as the provision of open space, the improvement of pedestrian access to existing open space, the provision of landscaping and green infrastructure, and wider streets that act as open space."	Agreed. Change proposed.
Environment Agency	Paragraph 5.3.12	We advise you to add the following wording to this paragraph for consistency: ', and that ecological enhancement is also incorporated.'	Partially agreed. Change proposed. This paragraph should cross refer to EN11 and EN17 and the need for ecological enhancement.
Environment Agency	CR4: Leisure, Culture and Tourism in Central Reading	In the last paragraph of the policy wording, we advise you to add 'and to conserve and enhance ecological value' at the end of the last sentence.	Agreed. Change proposed. This reference should be added.
The Theatres Trust	CR4: Leisure, Culture and Tourism in Central Reading	The Theatres Trust supports policy CR4 as it aims to safeguard and promote cultural facilities, reflecting guidance in Para 70 and 156 of the NPPF.	Noted. No change proposed.
Campaign for	CR5: Drinking	We welcome this policy's recognition that a range of complementary evening and night time uses	Partly agreed. Change proposed.

Real Ale - Reading and Mid Berkshire Branch	Establishments in Central Reading	<p>should be provided. Pubs are an important element of this and here it is useful to draw a distinction between the more traditional public houses within the central area (e.g. Alehouse, Butler, Lyndhurst, Bugle, Greyfriar) and the newer, larger chain bars. These offers are complementary and both fulfil an important function, but the more traditional pubs are much more likely to be under pressure from alternative uses than the larger bars. A recent example is the historic Rising Sun inn on Forbury Road where the owners wish to demolish it. As things stand the Plan affords no protection to these more traditional outlets and therefore will tend towards a polarisation of types of drinking venue within the centre, contrary to the aims of the policy. The wording change sought to Policy RL6 would address this point.</p> <p>We would also observe that the boundary of the central area as shown on inset N appears to cut through the middle of the Lyndhurst PH. Part of the return to Watlington Street, which appears externally to be a row of terraced houses, actually forms an integral part of the pub and therefore the Plan as drafted applies differing elements of policy to parts of the same establishment. We assume this is a drafting error and would request that this is addressed in the final version of the Plan.</p>	<p>In planning terms, it is difficult to distinguish between uses which are within the same use class on the basis of how they are managed or their target demographic. However, it should be noted that RL6 will be amended to refer to the whole Borough including the central area.</p> <p>It is agreed that the Central Area boundary should be amended to cover the whole of the Lyndhurst pub.</p>
Kier Property Developments Limited	CR6: Living in Central Reading	<p>Town Centre sites are often not appropriate locations for family units for instance due to the absence of gardens or proximity to educational establishments. Such reasons are often not connected to development viability. It is suggested that CR6 is amended so that the justification on the 5% provision does not just relate to a viability test. The suggested amended wording is as follows:</p> <p>“As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/studios, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable or there are other circumstances that justify a lower level of provision.”</p>	<p>No change proposed. It is recognised that the offer in central Reading will continue to be geared towards smaller households, which is why only a very small proportion of 5% is referred to. However, the absence of gardens need not prevent flats housing families (as they do in many other places), and education needs within central Reading will need to be addressed in any case.</p>
Ropemaker Properties Ltd	CR6: Living in Central Reading	<p>The specification of a minimum of 5% three bedroom is overly prescriptive. It is acknowledged earlier in the section (5.1.6) that central Reading is generally occupied by young professionals. This together with the report prepared by Haslams to support to the Planning Application at Weldale Street (ref: 170326) shows that market demand for three bedroom units in central Reading is very limited. Whilst a mix of units should be provided, the minimum of 5% being three bedrooms is not considered to be in line with market demand consequently reducing viability and resulting in a reduction in ability to provide affordable housing.</p>	<p>No change proposed. It is recognised that the market demand in central Reading is generally for smaller accommodation, which is why only a very small proportion of 5% is referred to. There is also recognition that the policy should be applied unless it can be demonstrated that it would render a development unviable.</p>
SGN plc	CR6: Living in Central Reading	<p>On developments of 15 dwellings or more, the policy states that, “as a guide”, a maximum of 40% of units should be 1-bed/studios and a minimum of 5% of units should be at least 3-bed “unless it can be clearly demonstrated that this would render a development unviable”. The</p>	<p>Noted. No change proposed.</p>

		flexibility that has been accordingly built into this policy is supported and welcomed, as well as the guidance on housing mix that will be expected by the Council.	
Historic England	CR9: Terraced Housing in Central Reading	We welcome this policy, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF	Noted. No change proposed.
Aviva Life and Pensions UK Ltd	CR10: Tall Buildings	Aviva welcomes the policy, which was integral to the Central Area Action Plan, and encourages provision for additional tall buildings in specific parts of the centre. Aviva is pleased that the Council acknowledges that tall buildings are not appropriate in all locations within the centre, but that they are best located in accessible locations such as in the area around the Reading train station.	Noted. No change proposed.
Green Park Reading No.1 LLP	CR10: Tall Buildings	GPR considers the interpretation of tall buildings should relate to its context. Ten storey office buildings in certain locations in central London would not be perceived to be tall. GPR accepts that ten storey commercial buildings would be considered tall in Reading and, that, therefore, the definition in the Plan is appropriate.	Noted. No change proposed. For certainty, it is considered necessary to have a simple definition of tall buildings.
Green Park Reading No.1 LLP	CR10: Tall Buildings	<p>Whilst GPR supports the vision for Reading, they do not consider tall buildings should be restricted to central Reading. South Reading plays a key role in supporting Reading as the dynamic and creative capital of the Thames Valley and regionally significant hub. Consequently, GPR consider that tall buildings could have a role to play on Green Park, as a key gateway to the town centre from the south and M4. The Ecotricity wind turbine already provides a precedent, and indeed, the Courage Brewery chimney was a symbol for many years of Reading's role as a brewing and trading centre. The area is now subject to significant change, most recently as a result of the resolution to grant planning permission for Royal Elm Park.</p> <p>Taller buildings also provide the opportunity to make an efficient use of land, as the original masterplan for Green Park was very generous in its positioning and layout of buildings and its surroundings. As Green Park becomes more accessible with the introduction of the train station, and the back drop to Green Park will soon be much more urban in nature as a result of Royal Elm Park, there is an opportunity to create more of a statement or landmark on the Park. GPR's agents would also support this approach in order to increase the Park's visibility on the M4 which would help with marketing.</p>	No change proposed. It is not agreed that tall buildings are appropriate outside central Reading. Densities should be highest where the level of accessibility is greatest, and where effects on landscape and townscape are acceptable, and this will not be on the fringes of the town. Very efficient use of land can be achieved without tall buildings.
Historic England	CR10: Tall Buildings	We welcome, in principle, the requirement for tall building proposals to "preserve and, where appropriate, enhance the setting of conservation areas and listed buildings", but we do not understand the caveat "where appropriate" - it is always appropriate to enhance the setting of heritage assets where possible. "Where appropriate" should therefore be "where possible" as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Agreed. Change proposed. The wording should be amended.
Inception Reading Sarl (Moorgarth)	CR10: Tall Buildings	Moorgarth supports a coordinated approach to tall buildings in Reading, and specifically the provision of the Western Grouping of tall buildings known as CR10b. However, the evidence base used to inform this policy, the Council's Tall Buildings Strategy, is now out of date given that it	Partly agreed. Change proposed. Whilst the Tall Buildings Strategy is

		<p>was produced in early 2008, almost a decade ago.</p> <p>On that basis, the detailed requirements of CR10b should be allowed greater flexibility so that up-to-date assessments provided as part of the planning application process can inform and guide appropriate locations and heights of new tall buildings. The effects of tall buildings on existing character, heritage and townscape should be interrogated at planning application stage, rather than being directed by policy, based on historic evidence base.</p> <p>The detailed wording of CR10b is therefore proposed for modification as follows:</p> <p>“A cluster of tall buildings would be appropriate to create a distinctive grouping, to mark the area as the civic heart of Reading and a gateway to the centre.</p> <p>Tall buildings in this area should:</p> <ul style="list-style-type: none"> • Contribute to the development of a cluster of tall buildings that is subservient to the Station Area Cluster; • Be generally lower in height than the tallest buildings approved for the Station Area Cluster; • Be linked to the physical regeneration of a wider area and should not be proposed in isolation; • Where buildings are to be integrated or front onto existing streets, include upper storeys of the taller structures that are set back from a base which is in line with the general surrounding building heights, particularly where the structure adjoins a conservation area; • Not intrude on the key view between Greyfriars Church and St Giles Church, and a view from the open space in the Hosier Street development to St Mary’s Church.” 	<p>now almost 10 years old, it is still of significant relevance given that it refers to townscapes that in many cases are largely unchanged. The only major change in the West Side MOA since the TBS was produced is the construction of Phase 2 of Chatham Street, and, since a tall building in a location such as this was always envisaged, this does not render the TBS out-of-date.</p> <p>It is agreed that the clause focusing tall buildings on the line of the IDR is not appropriate, given the more detailed work that has been undertaken on the Broad Street Mall/Hosier Street area.</p> <p>However, it is not considered that the work ‘secondary’ should be removed, as this is very much a key element of the overall approach and is in line with the following criteria.</p> <p>Replacing ‘appropriate’ with ‘planned’ rather than ‘approved’ would mean that the heights planned for in the Station Area Framework can be taken into account.</p>
Kier Property Developments Limited	CR10: Tall Buildings	<p>Our client supports the general thrust of policy CR10 on tall buildings and notes the inclusion of a definition of 12 or more storeys or 36m or more in height for residential development. However, in relation to policy CR10b (Western Grouping), the wording “clearly subservient” [to the Station Area Cluster] and “generally lower in height” [than the tallest buildings appropriate for the Station Area Cluster] lacks clarity and consistency. It would be helpful for the wording to be amended, for example as set out below:</p> <p>“Tall buildings in the area should:</p> <ul style="list-style-type: none"> • Contribute to the development of a cluster of tall buildings that is generally lower in height 	<p>No change proposed. The planned approach to tall buildings in the centre of Reading is a key part of the policy, and clearly includes the tallest buildings being located at the station. It is not agreed that the policy should allow for exceptions to this, as doing so would undermine the whole approach.</p>

		<p>than the tallest buildings appropriate for the Station Area Cluster;</p> <p>...</p> <p>Any application should include an assessment of the townscape impacts of tall buildings and will be judged on its own merits."</p> <p>The amended wording above will ensure that any proposals for tall buildings in the Western Grouping are judged on their own townscape and visual impact credentials so that one or more buildings could be taller than those in the Station Area Cluster, if this were assessed to be appropriate having regard to townscape impacts.</p>	
Mapeley Estates Limited	CR10: Tall Buildings	<p>The Western Tall Building Cluster boundary abuts but excludes Eaton Court. We are of the view that this may unnecessarily limit the development potential of both Eaton Court and other sites in this western edge of the Opportunity Area. We suggest instead that the tall building cluster boundary is redrawn to match that of the West Side Major Opportunity Area in this location. This would allow for the possibility of tall buildings in this area meaning taller buildings can at least come forward for consideration, perhaps where suitably detailed townscape analysis demonstrates it may be appropriate. For example, giving wider consideration to this part of the Opportunity Area would in the least allow for a proper master planning exercise to be undertaken. This could identify zones across which transitions in height should be made, successfully marrying tall buildings with the surrounding low-rise townscape.</p>	<p>No change proposed. This area was considered as part of the Tall Buildings Strategy, but was not considered to be one of the preferred areas for tall buildings. Whilst the Tall Buildings Strategy is now almost 10 years old, it is still of significant relevance given that it refers to townscapes that in many cases are largely unchanged. The only major change in the West Side MOA since the TBS was produced is the construction of Phase 2 of Chatham Street, and, since a tall building in a location such as this was always envisaged, this does not render the TBS out-of-date.</p>
McKay Securities PLC	CR10: Tall Buildings	<p>This policy should be amended so that the Station Cluster (CR10a) area is enlarged and expanded to maximise its potential. This area is a gateway to the city centre from the station and should provide the townscape to reflect this. The areas of Vastern Road which are not low-rise housing should be considered for inclusion in the tall building policy. These areas could be appropriately stepped down to the surrounding low-rise housing whilst providing denser development which is more appropriate to the central and accessible location. The different approach to different tall building areas is supported but the approach taken to the Eastern Grouping (CR10c) where there is deemed no scope for further tall buildings is not appropriate to the Station Cluster (CR10a), and this should be confirmed in the policy.</p>	<p>No change proposed. This seems to suggest locating tall buildings directly adjacent to low-rise terraced housing. This would have too great an effect on amenity of existing residents to be acceptable.</p>
Natural England	CR10: Tall Buildings	<p>Provide innovative green infrastructure, such as balcony/window planters, ground level landscaping, green walls, green roofs and roof gardens.</p>	<p>No change proposed. Ground level landscaping is generally required under general policy, whilst the acceptability of balconies depends on the overall design. The other types are referred</p>

			to in the policy.
Network Rail	CR10: Tall Buildings	Policy CR 10 is welcomed as this provides clarity on the type of high rise development the council is likely to find acceptable at Brunel Arcade.	Noted. No change needed.
Ropemaker Properties Ltd	CR10: Tall Buildings	<p>Ropemaker Properties Ltd objects to this policy, specifically in relation to the Western Building Cluster. This policy was based on an original tall building strategy published in January 2008 which is out of date. It is clear from this that particularly in respect of the western cluster that the tall building vision has not been realized with only one tall building being constructed at Chatham Place and this is ultimately a significantly watered down vision from that set out in the Chatham Street Development Brief (2002).</p> <p>The recently published housing white paper at 1.53 considers there is a need to ensure the effective use of land, which includes addressing the scope for higher density housing in urban locations that are well served by public transport and this includes looking at where buildings can be extended upwards using the 'air space' above. Reading is a clear candidate for this with it existing extensive public transport provision, which will only improve with Crossrail. The existing tall building boundary is considered to be overly prescriptive and not compliant with the NPPF paragraph 59.</p> <p>Having regard to previous development within the western cluster, together with the general thrust of government policy and the need for Reading to meet its OAN, the Tall Building Strategy Area clearly needs to be updated and reviewed.</p> <p>The land to the north of Chatham Street at Weldale Street is considered to be a suitable location for a tall building, the proximity of the site to the Chatham Street tower would help to create a cluster. Returning to the Tall Building Strategy the Weldale Street site is located within character area 13 which is a significant area comprising of two Major Opportunity Areas as defined by the Central Area Action Plan. This assessment suggests that the "degraded townscape condition all contribute to a high capacity for the development of tall buildings". Whilst it is appreciated that not all of this area could accommodate a tall building, the southern half of the character area at Weldale Street could comfortably accommodate a tall building and help to contribute to the overall vision for the western area.</p>	<p>Whilst the Tall Buildings Strategy is now almost 10 years old, it is still of significant relevance given that it refers to townscapes that in many cases are largely unchanged. The only major change in the West Side MOA since the TBS was produced is the construction of Phase 2 of Chatham Street, and, since a tall building in a location such as this was always envisaged, this does not render the TBS out-of-date.</p> <p>Tall buildings are not the only way to achieve high densities, and densities which make the most of the area's very high levels of accessibility can be achieved without a reliance on tall buildings, which, where inappropriately sited, have an effect on townscape and landscape far beyond their own bounds.</p>
Scottish and Southern Electricity plc	CR10: Tall Buildings	SSE consider that this policy is out of date and not based on a new evidence base which matches RBC's vision and aspiration. By restricting tall buildings to three areas within Reading town centre it restricts further development potential of areas just outside the tall building zones. SSE consider that the Riverside site could contain structures which exceed the benchmark heights or the tall building parameters subject to design which would not cause impact on visual / viewing corridors.	Whilst the Tall Buildings Strategy is now almost 10 years old, it is still of significant relevance given that it refers to townscapes in the Station/River area that in many cases are largely unchanged from what was planned at the time. Age by itself does not render a document out of

			date, and no specific reasons why the Strategy is out of date have been given.
Viridis Real Estate Services Limited	CR10: Tall Buildings	<p>With the exception of some inconsequential changes to the text, Policy CR10 repeats the Council's existing tall buildings policy RC13. The SA examines four policy options, including to amend policy approach to include more scope for tall buildings (Option iii). Option (iii) is the preferred option and states that it provides for additional scope for tall buildings. Viridis can find no changes of any substance that would provide "additional scope for tall buildings".</p> <p>AAP Policy RC13 is informed by the Reading Tall Buildings Strategy (TBS) published in January 2008. This document is over 9 years old and Reading has seen significant change during the intervening period. It is our view that to simply repeat adopted policy restrictions within a rapidly changing urban context and in the current housing climate, without any technical assessment, fails to plan positively for Reading's current and future growth needs and is therefore fundamentally flawed.</p>	<p>Whilst the Tall Buildings Strategy is now almost 10 years old, it is still of significant relevance given that it refers to townscapes that in many cases are largely unchanged from what was planned at the time - in fact, in the case of 42 Kenavon Drive, adjacent to the site in question, the development delivered is actually on average of a significantly lower density than what was permitted at the time. Age by itself does not render a document out of date, and no specific reasons why the Strategy is out of date have been given.</p>
Viridis Real Estate Services Limited	CR10: Tall Buildings	<p>The TBS adopts the approach that 'tall' is 10 commercial storeys or equivalent. This informed the threshold in AAP Policy RC13, which has been incorporated in draft Policy CR10 of the DLP. However, what is tall in one context may not be termed tall in another. CABE 'Guidance on Tall Buildings' (2007) offers no definitive definition for tall buildings. Instead it refers to context, i.e. that a 10 storey building could be deemed as 'tall' in the context of two storey Victorian terraces, whereas it may not be seen as such within a city centre. The criteria for assessing tall buildings in the CABE guidance explains that it is intended for buildings that are substantially taller than their neighbours and/or which significantly change the skyline. It is therefore our view that adopting a blanket approach to defining what constitutes a tall building across Reading is to crude, particularly in light of its new urban landscape emerging in the town centre.</p>	<p>Noted. No change proposed. For certainty, it is considered necessary to have a simple definition of tall buildings.</p>
Viridis Real Estate Services Limited	CR10: Tall Buildings	<p>Tall buildings have already been planned for within the central area clusters. However, Viridis considers that there to be scope to review this in light of the strategic importance placed on the central area to deliver growth and in view of the points raised above. For instance, within the East Side Major Opportunity Area (draft Policy CR13), is no longer characterised by solely low density development (as it was when the TBS was being prepared in 2007), having seen Forbury Place (11 storeys) and the Bellway Homes development (up to 8 storeys) to the west and east of the opportunity area completed. In addition, current planning applications, such as on the Toys R Us site propose taller buildings up to 12 storeys.</p> <p>2.39 The TBS Townscape and Visual Assessment examined the Viridis site (Character Area 10: Forbury Retail Park) and concluded that:</p>	<p>No change proposed. The Tall Buildings Strategy does not come to the conclusion that the area is appropriate for tall buildings. The recently completed development at Kenavon Drive is of lower density than the development that had permission at the time of the TBS. The 11 storeys at Forbury Place are substantially to the west and are very close to the station. The Forbury Place</p>

		<p>"The area is characterised by large blocky structures. Therefore a tall building would not appear uncharacteristic in terms of urban grain and townscape scale. There are few key views which characterise the area and therefore tall buildings would not jeopardise the visual experiences of the area. However, there are no buildings over 10 storeys within the area. A significantly taller building would become visually prominent, although assuming careful consideration is given to the design and placing, the building could provide focus to the area."</p> <p>On the basis of the above, and in acknowledgment of the strategic housing delivery importance of the central Reading area, draft Policy CR10 should enable consideration of tall buildings as part of major regeneration sites in the East Side Opportunity Area.</p> <p>On this basis Policy CR10 is not positively prepared, justified, effective or consistent with national policy.</p>	<p>development reduces in height towards the east. The Toys R Us site is a planning application that has not been determined, and the policy position is that 12 storeys are also not appropriate on this site.</p> <p>Tall buildings are not the only way to achieve high densities, and densities which make the most of the area's very high levels of accessibility can be achieved without a reliance on tall buildings, which, where inappropriately sited, have an effect on townscape and landscape far beyond their own bounds.</p>
John Wilkins	CR10: Tall Buildings	I notice that high rise development is restricted to three zones but there is no limitation on height. I think that RBC should strongly consider restricting such development to perhaps 15 floors or at least have the ability to stop developers going higher and higher.	No change proposed. The Council has previously set out building heights, but these were removed from the RCAAP due to (then) English Heritage concerns that they would be seen as a target.
Evelyn Williams	Paragraph 5.3.44	Mention is made in this paragraph of key panoramic views of the central area. There is no mention here of the approach from the south, which gives a view of the Blade and also, since the addition of floors, Thames Tower. These are particularly visible to pedestrians as the one-way system means that they are not as obvious to drivers.	Agreed. Views from the Whitley Street area should be highlighted here.
Natural England	Paragraph 5.3.45	Add dot point "Provide green infrastructure for a comfortable microclimate, cleaner air and visual interest."	Agreed. Change proposed. This should be added.
Aviva Life and Pensions UK Ltd	CR11: Station/River Major Opportunity Area	<p>Aviva broadly welcomes Policy CR11. Aviva see this as an appropriate (flexible) 'blue print' for the future of this part of Reading that takes advantage of its locational benefits. Aviva operates a successful retail park and the lease structures mean that comprehensive redevelopment is more likely to be towards the middle of the plan period.</p> <p>We consider that the development of the wider station area allows the significant improvement of north-south links through the centre, and offers the opportunity to expand the core of the centre northwards to help meet development needs of Reading. As such, Aviva supports the Council's view that for the development of these areas to be successful then developments must benefit from improved accessibility by public transport, and improved permeability for pedestrians and cyclists, particularly in a north-south direction to help change the perception of</p>	<p>Noted.</p> <p>Change proposed. It is agreed that there is a need to amend criterion vii of the policy, which deals with comprehensiveness, to deal with the issues related to neighbouring sites. Additional wording should also be added to the supporting text.</p>

		<p>the area north of the station as a separate entity. We support the acknowledgement that the area around the station is considered “appropriate for well-designed tall buildings, in line with the policy on tall buildings (CR10), and the area will be developed at a higher density even where there are no tall buildings” .</p> <p>We welcome the balanced approach to flood risk. The acknowledgement that whilst part of the allocation lies within Flood Zones 2 and 3a but that this consideration must be weighed against the vital role that these sites can play in the regeneration in the centre area of Reading, is supported.</p> <p>With the above in mind, Aviva’s starting point is to be supportive of proposals shown in Figure 5.3.</p> <p>Aviva consider it important for the ultimate completion of regeneration across the Major Opportunity Area that as sites are likely to be brought forward at different timescales and by different site owners, and be subject to piecemeal planning applications, such individual applications do not prejudice the ability of adjoining owners to bring forward schemes in a coordinated and controlled way. An obvious such outcome to be avoided is the inequitable approach to the requirement for stand-offs etc. Each application should be required to be cognisant of the likely overall outcome desired when development of the area is complete and not cause one land owners to bear a disproportional amount of open space than other developers, or by the land use and placement of buildings on the edge of land plots result in a full stand-off being required to be absorbed by a land owner yet to bring forward its own proposals. Not to do so would be inequitable to landowners, as it would mean the first developer would achieve a minimal mitigation package or provision of public realm, whilst subsequent developers would be liable for greater mitigation. We suggest that a form of words be incorporated that ensures a requirement of an application is to demonstrate how it does not prejudice the development potential of adjoining sites and bears a reasonable proportion of mitigation costs and public realm provision amongst the landowners within the wider allocation.</p>	
Chris Bedford	CR11: Station/River Major Opportunity Area	The plan appears to require a 'high quality' north-south route through sites CR11e and g combining pedestrian and cycle facilities and a 'green link'. If this is what is meant, it is misguided. The 'active frontages' required in 5.4.6 are for the benefit of those on foot, but distracting to cyclists. A 'green link' may be impossible to keep wild through the middle of shops and restaurants. It should be made clear that these are three separate requirements requiring separate routes.	No change proposed. A green link does not necessarily have to be a significant strip of wild vegetation. It could be something as simple as a line of large trees or a landscaped water feature.
Historic England	CR11: Station/River Major Opportunity Area	We welcome, in principle criteria vi) and vii), but we do not understand the caveat “where appropriate” in criterion vi) - it is always appropriate to enhance the setting of heritage assets where possible. “Where appropriate” should therefore be “where possible” as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF. We would also like to see “which should inform	Agreed. Change proposed. The wording of these criteria should be amended to reflect this.

		the development" added to the end of criterion vii).	
McKay Securities PLC	CR11: Station/River Major Opportunity Area	All of the Station/River Major Opportunity Area (MOA) should have the potential for tall buildings to be permitted where appropriate, and policy CR10 and CR11 should be amended to reflect this. This would help support the policy aims of policy CR11 to provide high density, mixed use developments which utilise their accessible locations. Taller buildings would also allow for a more dense use of land whilst retaining the flexibility to provide open space and permeability benefits.	No change proposed. It is not agreed that the entire area is appropriate for tall buildings. The policy is underpinned by a Tall Buildings Strategy which looks at this issue in detail, and identifies where tall buildings might or might not be appropriate. High density does not necessitate tall buildings.
McKay Securities PLC	CR11: Station/River Major Opportunity Area	<p>The Riverside MOA should be extended to the west to include Great Brighams Mead at 1-9 Vastern Road. The low rise-residential area between could be excluded and guidance provided on stepping down the MOAs to fit in with this lower streetscape. The area of low rise housing already sits adjacent to part of the proposed MOA and therefore including the Great Brighams Mead site within the MRA would not present new problems or difficulties relative to the existing relationships in the area.</p> <p>The Great Brighams Mead site is a highly visible plot of land, located off a main roundabout that connects Caversham Road and Vastern Road. Redevelopment of this site would provide and excellent opportunity to create a landmark development which increases density on the central site whilst improving connectivity to the river. Figure 5.3 demonstrates that this site is a gap in the redevelopment strategy of this central area and would clearly be appropriate for inclusion in the MOA.</p> <p>Alternatively, if the Great Brighams Mead site is not to be included in an MOA, it should be considered for inclusion in Policy CR14: other sites for development in Central Reading.</p>	<p>No change proposed.</p> <p>Great Brigham's Mead has been considered through the HELAA, and was not considered suitable for allocation. The main issue affecting the land is flood risk, and technical work has been undertaken which shows that there would not be safe access to any development. The site would be dependent on an evacuation plan.</p>
Natural England	CR11: Station/River Major Opportunity Area	Suggested change: "v) Provide additional areas of open space with green infrastructure where possible, including a direct landscaped link between the station and the River Thames;"	Agreed. Change proposed. The criterion should refer to green infrastructure.
Scottish and Southern Electricity plc	CR11: Station/River Major Opportunity Area	SSE supports the inclusion of CR11g within a Major Opportunity Area and supports the main thrust of Policy CR11.	Noted. No change needed.
Scottish and Southern Electricity plc	CR11: Station/River Major Opportunity Area	SSE supports the vision of Policy CR11 and in particular 'the station / river area will be a flagship scheme'	Noted. No change needed.
Scottish and Southern Electricity plc	CR11: Station/River Major Opportunity Area	The proposed development of the site offers the only opportunity to meet the policy aims in (i) and (ii). It would increase the north / south pedestrian and cycle links to the town centre which has been envisaged by RBC positioning Christchurch Bridge across the River Thames.	Noted. No change needed. It is agreed that the SSE site is a key element of achieving the spatial strategy for the centre.

Jan Steele	CR11: Station/River Major Opportunity Area	The new railway station is fantastic, but the huge flat concrete areas on each side are very depressing. There should be a beautiful gardens with paths through them on either side - like a knot garden for instance.	No change proposed. The policy should refer to green infrastructure, but there is a role for such urban squares as part of the town centre offer.
Historic England	CR11a: Friar Street and Station Road	We welcome, in principle, the commitment to the preservation of the setting of listed buildings in the area, although we would like the commitment to include the preservation of the listed buildings themselves as well, and we prefer "conservation" to "preservation" as terminology more consistent with the NPPF and as recognising that sensitive development can maintain, or even enhance, the significance of historic buildings and places.	Agreed. Change proposed. The wording of this criterion should be changed to reflect this point, and also to refer to historic gardens to ensure that Forbury Gardens is taken into account.
Thames Water	CR11a: Friar Street and Station Road	The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11a: Friar Street and Station Road	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11a: Friar Street and Station Road	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Thames Water	CR11a: Friar Street and Station Road	There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	Noted. No change proposed. This issue is recognised in paragraph 5.4.12.
Historic England	CR11b: Greyfriars Road Corner	This area 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 commitment to the conservation of the setting of these listed structures, particularly given the high significance of the church, within the policy.	No change proposed. Criterion vi of this policy ensures the conservation of listed buildings and their settings, and it is not considered necessary to repeat this protection throughout the policy.
McKay Securities	CR11b: Greyfriars	Policy CR11b should be amended as follows:	No change proposed. Friar Street is a

PLC	Road Corner	"There will be active uses on the ground floor along Friar Street <u>if appropriate</u> [...]."	primary frontage, and it is essential for the vitality and viability of this part of the centre that active uses are located on this frontage.
Thames Water	CR11b: Greyfriars Road Corner	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11b: Greyfriars Road Corner	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11b: Greyfriars Road Corner	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	CR11c: Station Hill and Friars Walk	This area is within the setting of the grade II main station building. We would therefore welcome a commitment to the conservation of the setting of this building within the policy, as par.t of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF	No change proposed. Criterion vi of this policy ensures the conservation of listed buildings and their settings, and it is not considered necessary to repeat this protection throughout the policy.
Thames Water	CR11c: Station Hill and Friars Walk	The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11c: Station Hill and Friars Walk	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.

		infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	
Thames Water	CR11c: Station Hill and Friars Walk	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	CR11d: Brunel Arcade and Apex Plaza	We welcome the requirement 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 the NPPF.	No change proposed. Criterion vi of this policy ensures the conservation of conservation areas and historic gardens and their settings, and it is not considered necessary to repeat this protection throughout the policy.
Legal and General Property	CR11d: Brunel Arcade and Apex Plaza	We support policy CR11d, and the inclusion of Apex Plaza as a site allocation within the emerging Local Plan. We agree that the site provides significant potential to deliver a range of uses within a redevelopment scheme of significant scale during the course of the Plan period. We consider that it is entirely appropriate for Apex Plaza to be allocated for development in its own right, which the wording of the draft Local Plan appears to do, rather than being linked to Brunel Arcade. An allocation that promotes a positive, flexible approach will ensure the Borough's Plan is deliverable, can meet local needs, and can deliver wider development plan objectives.	Noted. No change proposed. We would not necessarily expect each sub-area to be developed at the same time, but it is clearly necessary that parts of the same sub-area are developed having regard to the remainder of the site.
Network Rail	CR11d: Brunel Arcade and Apex Plaza	As owners of Brunel Arcade it has been NR's intention for some while to re-develop this site with a tall building providing a mix-use development incorporating a large proportion of residential accommodation. NR therefore supports Policy CR11d. Whilst NR do not object to the joint designation with Apex Plaza, reference is made to the point made in our representation to the Issues and Options consultation last year, drawing attention to the fact that the re-development of Apex Plaza is clearly a matter for the owners of this building and therefore it is important that planning policies should not in any way restrict NR's ability to bring forward the re-development of Brunel Arcade independently.	Noted. No change proposed. We would not necessarily expect each sub-area to be developed at the same time, but it is clearly necessary that parts of the same sub-area are developed having regard to the remainder of the site.
Thames Water	CR11d: Brunel Arcade and Apex Plaza	The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11d: Brunel Arcade and Apex Plaza	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.

Thames Water	CR11d: Brunel Arcade and Apex Plaza	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Environment Agency	CR11e: North of the Station	The Vastern Ditch runs in culvert under this site. There is therefore an opportunity to deculvert the watercourse through the site, creating a naturalised feature with enhanced ecological and aesthetic value. This aim should be included in the wording of this sub policy and further support should be given in the supporting paragraphs.	Agreed. Change proposed. The sub-area policy should identify the potential to deculvert the ditch.
Hammerson Plc	CR11e: North of the Station	CR11e provides an indicative potential increase in retail floorspace of 3,000-6,000m ² . This allocation needs to include a requirement that the proposals properly assess the impact on the existing retail core (in terms of both trade diversion and investor confidence) and provide strong and genuine pedestrian links to it. Significant retail development divorced from the existing retail core has the potential to create two separate cores. This would not be to the benefit of Reading Town Centre. The following sentence should therefore be added: "The retail should not have a detrimental impact on the existing retail core of Broad Street, The Oracle and Broad Street Mall and should provide strong pedestrian links to it."	Change proposed. The need to be well linked to, and avoid a detrimental impact on, the rest of the retail core should be highlighted.
Historic England	CR11e: North of the Station	According to our records, there are no designated heritage assets on or near this site, but regard should be had to the Historic Environment Record for potential archaeological remains, given the recognition in paragraph 5.4.10 of the high archaeological potential of the area.	Noted. This is covered in criterion vii of policy CR11.
Thames Water	CR11e: North of the Station	The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11e: North of the Station	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11e: North of the Station	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Bell Tower	CR11f: West of	As far as access to open space for recreation goes, the development of the strip comprising Cox	Agreed. Change proposed. The policy

Community Association	Caversham Road	& Wyman, 2 Ross Road and part of Meadow Road (WR3b) as well as area CR11f should provide publicly accessible open spaces which are lacking in our area as the council points out in its assessment of access to open space Central Reading (4.2.36) We therefore welcome the following two undertakings on open spaces from the council in policy EN9. We would want to see a policy point to this effect in policies WR3a, WR3b and CR11f.	should refer to on-site public open space in line with the requirements of EN9.
Bell Tower Community Association	CR11f: West of Caversham Road	The development of area CR11f should preserve and restore the architecture on the corner of Swansea and Northfield Roads as well as reflecting the engineering heritage of the site. Policy CR11f should include reference to historic context in line with policy EN6.	Partially agreed. Change proposed. This corner does not make up part of the identified site, and therefore no requirements can be made about the preservation of the site, but CR11f should refer to the historic context to the west.
Bell Tower Community Association	CR11f: West of Caversham Road	We would like to see vehicle access only from the Caversham Road to avoid channelling traffic into Swansea Road, which is narrow and contains a school entrance.	No change proposed. Figure 5.3 shows the main vehicle access point as being from Northfield Road. No access from Swansea Road is proposed.
Historic England	CR11f: West of Caversham Road	According to our records, there are no designated heritage assets on or near this site, but regard should be had to the Historic Environment Record for potential archaeological remains, given the recognition in paragraph 5.4.10 of the high archaeological potential of the area.	Noted. This is covered in criterion vii of policy CR11.
Thames Water	CR11f: West of Caversham Road	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11f: West of Caversham Road	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11f: West of Caversham Road	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Environment Agency	CR11g: Riverside	In the first sentence, insert 'the top of the bank of' before "the river" and at the end of this sentence, add 'to create an undeveloped ecological buffer with enhanced ecological value.'	No change proposed. The site is separated from the riverbank by a much-used towpath and the approach to a pedestrian and cycle bridge, and

			an undeveloped ecological buffer is not deliverable in this location.
Historic England	CR11g: Riverside	According to our records, there are no designated heritage assets on or near this site, but regard should be had to the Historic Environment Record for potential archaeological remains, given the recognition in paragraph 5.4.10 of the high archaeological potential of the area.	Noted. This is covered in criterion vii of policy CR11.
Natural England	CR11g: Riverside	Suggested change: "Development should maintain and enhance public access along and to the Thames, and will be set back at least ten metres from the river."	No change proposed. It is not clear what this wording change would achieve.
Scottish and Southern Electricity plc	CR11g: Riverside	<p>SSE agrees that the station / river area should be a flagship scheme, extending the centre and the improvement of transports links and area northwards towards the River Thames. The site is key to opening up the transport links (pedestrian and cycling) from Christchurch Bridge to the town centre. Without this link the location of the bridge has no validity as it does not provide a direct route into the town centre. The centrally placed transformers and switch room will prevent the realisation of the vision, in particular the ability to create a pedestrian route across the site focussed on the Christchurch Bridge, unless there is sufficient value in the scheme to secure their viable relocation.</p> <p>SSE proposal to redevelop the site to achieve RBC's aims for a 'key movement corridor' and 'new area of open space' as indicated on Figure 5.3. For this to happen, the two 132/111 kV transformers and associated switch room will need to be relocated. The relocation of this the electrical equipment is very costly and will lead to high (several million pounds) abnormal costs. Therefore, the development parameters for the site must be sufficiently flexible to reflect the cost of the relocation in order to ensure proposals are viable.</p>	<p>Change proposed. The policy as worded includes a substantial amount of flexibility around the development of this site, and it is not clear at this stage that development within those parameters cannot be achieved.</p> <p>Nevertheless, it is agreed that creation of this north-south link is of paramount importance. The supporting text can therefore be amended to recognise that this is the priority for the site, and that this should be taken into account in development management decisions.</p>
Scottish and Southern Electricity plc	CR11g: Riverside	SSE disagrees that the development should be set back at least ten metres from the River Thames. This would severely restrict the developable area of the site which is already constrained by the electrical equipment and low height housing on at Lynmouth Road. RBC must understand the commercial reality that the riverside is where the value created to enable the site to be redeveloped. SSE propose that the distance from the River Thames to development should be 5 metres. SSE will carefully consider visual/viewing corridors in any proposed development including along the River Thames.	No change proposed. 10 metres is not a particularly wide setback. Generally, development along the this part of the south bank of the Thames rarely comes closer than around 8-9m from the riverbank in any case. It is not considered that this modest setback necessarily significantly changes viability on the site, but if it does it will need to be assessed on its merits in view of the significance that the plan places on the north-south link.
Scottish and Southern Electricity plc	CR11g: Riverside	SSE agrees with the need for a high quality green link from the town centre to Christchurch Bridge. SSE proposal include a pedestrian and cycle link with open green space towards the River Thames.	Noted. No change needed.

Scottish and Southern Electricity plc	CR11g: Riverside	SSE supports the indicative development potential of 250 - 370 residential dwellings and 1,000 - 2,000 sq m of leisure.	Noted. No change needed.
Scottish and Southern Electricity plc	CR11g: Riverside	The Reading Station Area Framework (RSAF) identified this site as falling within the area of potential for medium-high density development with a 'benchmark' heights of 4 storeys (on the west) and 6 storeys (on the east). SSE believes that to deliver RBC's aspirations for this site higher density and landmark buildings must be towards the River Thames to generate value in the site to offset the high abnormal costs of relocating the electrical infrastructure. The Christchurch Bridge is a major gateway to the town centre and can be marked as such.	No change proposed. It is not agreed that high density and landmark buildings are appropriate on the river frontage of the site and in this close proximity to low-rise residential. The full analysis of these matters is set out in the Reading Station Area Framework and supporting documentation.
Thames Water	CR11g: Riverside	The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11g: Riverside	The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11g: Riverside	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	CR11h: Napier Road Junction	According to our records, there are no designated heritage assets on or near this site, but regard should be had to the Historic Environment Record for potential archaeological remains, given the recognition in paragraph 5.4.10 of the high archaeological potential of the area.	Noted. This is covered in criterion vii of policy CR11.
Thames Water	CR11h: Napier Road Junction	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11. It should be noted that the Council has now resolved to grant planning permission for a development of this site.
Thames Water	CR11h: Napier Road Junction	The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development.	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11. It should be noted that

		Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	the Council has now resolved to grant planning permission for a development of this site.
Thames Water	CR11h: Napier Road Junction	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	CR11i: Napier Court	According to our records, there are no designated heritage assets on or near this site, but regard should be had to the Historic Environment Record for potential archaeological remains, given the recognition in paragraph 5.4.10 of the high archaeological potential of the area.	Noted. This is covered in criterion vii of policy CR11.
Network Rail	CR11i: Napier Court	Network Rail own land to the east of Napier Court (3.2 ha). The western third of this site is a secure NR maintenance depot/storage compound with buildings and vehicular access onto Napier Road. The area to the east is more open with a further vehicular entrance onto Napier Road. A small area of land around the entrance is currently used by NR for external storage but the rest of this site is vacant. It is anticipated that following the upgrade work to the rail network on the west side of Reading, an area of operational land within the "Railway Triangle" off Cow Lane will become available. This is likely to provide an opportunity to re-locate the depot and storage facilities currently at Napier Road to the Railway Triangle. Our holding at Napier Road would then become vacant and suitable for a residential development. Such a residential development could significantly help address the 943 dwelling shortfall in meeting Policy H1 referred to in paragraph 4.4.5 of the Local Plan. To facilitate the residential development of this land it is suggested that the boundary of the "Napier Court Major Opportunity" Area is extended eastwards to incorporate our land holding.	Agreed. Change proposed. This site has been added to consideration in the HELAA, and it was considered to be partially suitable for residential development subject to an alternative site being available for the depot. The remainder to the east is not suitable for residential development due to wildlife constraints as well as the proximity of the land to the railway and constrained nature of the site.
Thames Water	CR11i: Napier Court	The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11i: Napier Court	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion ix of policy CR11.
Thames Water	CR11i: Napier Court	The total development identified in the sewerage catchment draining to Blakes Lock SPS within	Noted. No change needed.

		the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	
LaSalle Investment Management	Paragraph 5.4.1	LaSalle supports the Council's acknowledgement that large parts of the area is currently low density and that there is an inefficient use of one of the most accessible locations in the South East.	Noted. No change proposed.
LaSalle Investment Management	Paragraph 5.4.4	LaSalle support the Council's conclusion at paragraph 5.4.4 that 'in order for the station area to become a destination in its own right, it should contain a wide mix of vibrant uses across the area'.	Noted. No change proposed.
Historic England	Paragraph 5.4.8	We welcome the recognition in this paragraph 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 the NPPF. These principles should be reflected in each of the sub-area policies.	Noted. No change proposed. The importance of this issue is agreed, but the purpose of the criteria in the main part of policy CR11 is to avoid the need for repetition throughout the sub-area policies.
Historic England	Paragraph 5.4.10	We welcome the recognition of the high archaeological potential of this area and the requirement for early consultation, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change proposed.
Historic England	CR12: West Side Major Opportunity Area	We welcome, in principle, criteria v) and vi) the commitment to the protection of the setting of listed buildings in the area, but we do not understand the caveat "where appropriate" in criterion v) - it is always appropriate to enhance the setting of heritage assets where possible. "Where appropriate" should therefore be "where possible" as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF. We would also like to see "which should inform the development" added to the end of criterion vi) and the commitment to include the protection of the listed buildings themselves as well.	Agreed. Change proposed. The wording of these criteria should be amended to reflect this.
Inception Reading Sarl (Moorgarth)	CR12: West Side Major Opportunity Area	Moorgarth generally supports the Council's aspirations for the West Side Major Opportunity Area. In particular, Moorgarth supports the policy direction toward a mix of uses including residential in this location.	Noted. No change proposed.
Inception Reading Sarl (Moorgarth)	CR12: West Side Major Opportunity Area	Limb ii) of the policy should be amended given the lack of published evidence or feasibility work to demonstrate the technical practicality of improved crossings of the IDR, with the addition of "where possible and viable".	Partially agreed. Change proposed. Improved crossings do not necessarily mean new crossings. However, it is agreed that this can only be provided where it is achievable, and the text should reflect that.
Mapeley Estates Limited	CR12: West Side Major Opportunity	We are in full support of the western extent of the Opportunity Area's boundary. The western boundary encompasses a number of buildings and sites, including Eaton Court, that have clear	Noted. No change proposed.

	Area	development potential and the potential to contribute to Reading's future social and economic success.	
Natural England	CR12: West Side Major Opportunity Area	Suggested change: "Provide additional or improved areas of open space and green infrastructure wherever possible, including street trees, landscaping and SuDS;"	Partially agreed. Change proposed. The policy should refer to provision of green infrastructure. Policies covering trees, landscaping, SuDs are already in the Local Plan and will apply equally here.
Natural England	CR12: West Side Major Opportunity Area and paragraph 5.4.15	Oxford Road is such an ugly un-green street which is visible from the city centre. This would be the perfect opportunity to require development to enhance the street scape with trees etc.	Agreed. Change proposed. There should be an additional sentence added to CR12c to identify the opportunity to improve the Oxford Road frontage.
Chris Bedford	CR12a: Cattle Market	Large retail units perform a useful role on edge of centre sites, encouraging those who might otherwise shop out of town to make linked trips that include visiting the centre. The loss in particular of DIY stores is proving a particular blow to those without cars, since these stores themselves killed off hardware shops and small builders' merchants, and the plan is actively promoting this process. Site proposals CR12a and CR13 should be changed to encourage the incorporation of larger scale retail uses into redevelopment.	No change proposed. CR12a already identifies the site for bulky goods retail.
Hammerson Plc	CR12a: Cattle Market	CR12a provides an indicative potential increase in retail floorspace of 10,000-15,000m ² . This allocation needs to include a requirement that the proposals properly assess the impact on the existing retail core (in terms of both trade diversion and investor confidence) and provide strong and genuine pedestrian links to it. Significant retail development divorced from the existing retail core has the potential to create two separate cores. This would not be to the benefit of Reading Town Centre. The following sentence should therefore be added: "The retail should not have a detrimental impact on the existing retail core of Broad Street, The Oracle and Broad Street Mall and should provide strong pedestrian links to it."	Partially agreed. Change proposed. The allocation must be supported by evidence showing no significant adverse impact on the town centre, as was the case in the original RCAAP allocation. However, this is likely to hinge on development for goods that do not compete with the core town centre offer, and the policy therefore needs to clarify that there should not be a significant element of non-bulky comparison goods.
Hammerson Plc	CR12a: Cattle Market	CR12a refers to the site being developed for a 'mix of edge-of-centre retail uses, which may include bulky goods'. This terminology is ambiguous - what are edge-of-centre retail uses? The Allocation should clarify that the Cattle Market site is suitable for large format, bulky goods retailers that cannot typically be accommodated on town centre sites.	Partially agreed. Change proposed. The policy should be clarified - see response above.
Historic England	CR12a: Cattle Market	According to our records, there are no designated heritage assets on or near this site (except the grade II listed Regent Place, but regard should be had to the Historic Environment Record for potential archaeological remains, given the recognition in paragraph 5.4.18 of the high archaeological potential of the area.	Noted. This is covered in criterion vi of policy CR12.

Thames Water	CR12a: Cattle Market	The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.	Noted. No change proposed. This issue is recognised in criterion viii of policy CR12.
Thames Water	CR12a: Cattle Market	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion viii of policy CR12.
Thames Water	CR12a: Cattle Market	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
John Wilkins	CR12a: Cattle Market	The housing development in the Cattle Market site is very sensible.	Noted. No change needed.
Historic England	CR12b: Great Knollys Street and Weldale Street	This sub-area includes the grade II listed 29 and 31, Caversham Road. We would therefore welcome a requirement in the policy for the conservation and enhancement 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 the NPPF	Agreed. Change proposed. The sub-area clause should refer to the listed buildings within the area.
Bob O'Neill	CR12b: Great Knollys Street and Weldale Street	As I had said on one of your open days, the former Wickes/Iceland site should be allowed to follow the tall building scale that Chatham Place has had. Indeed, it is far more suitable site to take the access and service vehicles than Chatham Place is. Why should one developer get the eagle nest view and not the other?	No change proposed. Sites within central Reading were assessed for their suitability for tall buildings as part of the Tall Buildings Strategy, and this site is not considered suitable.
Ropemaker Properties Ltd	CR12b: Great Knollys Street and Weldale Street	It is pleasing to see that the Great Knolly Street and Weldale Street allocation (CR12b) remain in this plan, however there are significant concerns about the indicative number of potential dwellings set out. There is a current application pending on approximately half of the site for 429 units, which clearly indicates that there is potential for significantly more dwellings that indicatively set out in policy CR12b. Having regard to the Government White Paper, the shortfall in meeting Readings OAN as set out in policy H1 and the NPPF, the Major Opportunity Areas should seek to maximize densities wherever possible having regard to surrounding development.	No change proposed. The dwelling range specified relates in large part to the Wickes and Iceland site, for which there is a current planning application in any case - the requirement to replace small business units mean that the potential of the remainder is limited. It should be noted that the planning application is currently undetermined, and therefore it is not accepted that the capacity of the site to accommodate that level of

			development has necessarily been demonstrated.
Thames Water	CR12b: Great Knollys Street and Weldale Street	The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.	Noted. No change proposed. This issue is recognised in criterion viii of policy CR12.
Thames Water	CR12b: Great Knollys Street and Weldale Street	The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion viii of policy CR12.
Thames Water	CR12b: Great Knollys Street and Weldale Street	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	CR12c: Chatham Street, Eaton Place and Oxford Road	We welcome 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, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF	Noted. No change needed.
Mapeley Estates Limited	CR12c: Chatham Street, Eaton Place and Oxford Road	We and our client are entirely supportive of the proposed mix of land uses for the CR12(c) site. The redevelopment of the Eaton Court site would allow for delivery of active ground floor frontages as well as significant residential floorspace with supporting commercial uses. In addition, with suitably arranged height, bulk and mass, the site is well positioned to provide new public open space, potentially in the form of a new 'town square'.	Noted. No change needed.
Mapeley Estates Limited	CR12c: Chatham Street, Eaton Place and Oxford Road	The site's accessibility and the densities and heights deemed appropriate on nearby sites suggests capacity should not be unnecessarily restricted, subject to other planning considerations and design criteria. Policy should therefore be clear that this is an indicative range and not a maximum. Further, as Policy CR12 suggests 'inappropriate building scale at the fringes of the site will not be permitted...', we are of the view that the majority of this capacity must be realised in the centre of the site - approximately the area occupied by Eaton Court's car park. Applications for development within site CR12 (c) should therefore be accompanied by an appropriate master plan that demonstrates how individual sites within the allocation can be developed, relative to each other.	Partially agreed. Change proposed. It is agreed that there needs to be some recognition of where sites might come forward at different times, and that they should have regard to one another. This can be added to the policy.
Thames Water	CR12c: Chatham	The water network capacity in this area may be unable to support the demand anticipated from	Noted. No change proposed. This

	Street, Eaton Place and Oxford Road	this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	issue is recognised in criterion viii of policy CR12.
Thames Water	CR12c: Chatham Street, Eaton Place and Oxford Road	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion viii of policy CR12.
Thames Water	CR12c: Chatham Street, Eaton Place and Oxford Road	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	CR12d: Broad Street Mall	According to our records, there are no designated heritage assets on or near this site, but regard should be had to the Historic Environment Record for potential archaeological remains, given the recognition in paragraph 5.4.18 of the high archaeological potential of the area.	Noted. This is covered in criterion vi of policy CR12.
Inception Reading Sarl (Moorgarth)	CR12d: Broad Street Mall	Moorgarth generally supports Policy CR12d, Broad Street Mall, subject to minor suggested amendments, as set out below. "The site will be used for continued retail and leisure provision, maintaining frontages along Oxford Street and St Mary's Butts, and improving frontages to Hosier Street and Queen's Walk, with uses including residential and offices, on upper floors. This may be achieved by extensions or proposals for comprehensive redevelopment, including provision of tall buildings above which will form part of the Western Grouping. Site size: 2.75 ha Indicative potential: Up to 500 dwellings, no significant net gain of retail and leisure."	Partially agreed. Change proposed. The reference to Queens Walk should be added. The policy emphasis is considered to be correct, in that it specifies that retention of the Mall is dependent on improved frontages. Tall buildings may be appropriate on this site, but in general the MOA policies avoid repeating the content of policy CR10, as different wording may give rise to conflicting interpretations. Reference to tall buildings should be made in the supporting text.
Thames Water	CR12d: Broad Street Mall	The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.	Noted. No change proposed. This issue is recognised in criterion viii of policy CR12.
Thames Water	CR12d: Broad Street Mall	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development.	Noted. No change proposed. This issue is recognised in criterion viii of policy CR12.

		Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	
Thames Water	CR12d: Broad Street Mall	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Chris Bedford	CR12e: Hosier Street	The specification for site CR12e should include a requirement to fill the unsightly gap on the Hosier St corner, even if removal of trees is required.	Partially agreed. Change proposed. The policy should highlight the need to improve the entrance from St Mary's Butts.
Historic England	CR12e: Hosier Street	This 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 the policy 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 the NPPF.	Noted. This is covered in criterion vi of policy CR12.
Kier Property Developments Limited	CR12e: Hosier Street	Our client is pleased that the site has been included as allocation CR12e for a new residential community and supports this allocation, subject to the comments set out below.	Noted. No change needed.
Kier Property Developments Limited	CR12e: Hosier Street	<p>Greater flexibility should be included in the policy in relation to the proposed mix of uses in order to allow delivery of the site. For example, inclusion of the provision of a hotel use as an acceptable supporting use. Paragraphs 23 and 24 of the NPPF support the provision of main town centre uses, including hotels, in town centre locations in order to ensure the vitality of such centres. This principle is also included in policies CR1 and CR4, which support the provision of "other main town centre uses" (including hotels) within the central core of Reading.</p> <p>Greater flexibility should be included in the policy in relation to the provision of active frontages as retail/leisure uses. A restrictive policy could hinder the ability to let units in this location, which could impact on deliverability of a future redevelopment scheme. Policy CR7 refers to primary frontages in central Reading and includes C1 uses as appropriate within these frontages. For consistency, this use should be included within the policy wording of CR12e. There are also means of providing active frontages within residential schemes without the inclusion of retail or leisure and this should be acknowledged in the revised wording to the policy. Suggested amendment to the policy is set out as follows:</p> <p>"The edges of the open space will be activated with retail and/ or other main town centre uses, where appropriate. The design of buildings could also incorporate residential uses and/or entrances as ground floor level in order to activate frontages. Development may also include a</p>	Partially agreed. Change proposed. It is agreed that other main town centre uses such as hotel use can activate frontages, and that, as part of the Central Core, these uses may be appropriate, so this should be reflected in the policy. However, it is not agreed that this can adequately be achieved on a key area of town centre open space by residential entrances.

		hotel or some limited office uses..."	
Bob O'Neill	CR12e: Hosier Street	I fail to understand why RBC has left the former Civic site untouched if it is under pressure to provide development land. This is most definitely now a brownfield site and could account for some of the land needed to create a Manhattan-on-Thames -very much a candidate for a very tall high density housing site. The former RBC rented tower over the Butts has already started a trend there.	Noted. No change proposed. Work on the future of this site is ongoing, but it remains in the Local Plan as a development allocation.
Thames Water	CR12e: Hosier Street	The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build	Noted. No change proposed. This issue is recognised in criterion viii of policy CR12.
Thames Water	CR12e: Hosier Street	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion viii of policy CR12.
Thames Water	CR12e: Hosier Street	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
The Theatres Trust	CR12e: Hosier Street	The Trust cautiously welcomes Policy CR12e, HOSIER STREET. We recognise the Hexagon Theatre needs renewal in order to ensure the building meets current building standards, audience expectations, and improve sustainability in order to remain a viable and competitive theatre in the long term. But a revitalised theatre, not just a new theatre building, can meet these needs, and also encourage wider regeneration in the area as well as being a more environmentally sustainable option, and the supporting text should also reflect this. The text should also suggest a replacement must be provided on this site and remove the reference to 'is preferred'.	Partly agreed. Change proposed. A revitalised theatre that meets needs would accord with the policy. The supporting text should remove reference to 'preferred'.
Environment Agency	Paragraph 5.4.15	This rightly states that "the existence of ..historic assets can be viewed as an opportunity rather than a constraint". We would argue that this applies to all watercourses within the Borough.	Noted. No change proposed. The point is taken, but is not relevant to refer to here, as no watercourses are within the area.
Historic England	Paragraph 5.4.15	We welcome the recognition 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	Noted. No change needed.

		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 the NPPF.	
Historic England	Paragraph 5.4.18	We welcome the recognition of the high archaeological potential of this area and the requirement for early consultation, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change needed.
Aviva Life and Pensions UK Ltd	CR13: East Side Major Opportunity Area	<p>Aviva welcomes Policy CR13.</p> <p>The principle Aviva wish is to raise the need for fairness and equality in seeking the development of the allocations. Landowners are reliant on the LPA ensuring that each development being brought forward within the allocation will be responsible for its fair share of mitigation and provision of public realm, whilst not prejudicing the appropriate development potential of individual sites through individual scheme designs.</p> <p>As with our response to CR11, we suggest that a form of words be incorporated that ensures a requirement of an application is to demonstrate how it does not prejudice the development potential of adjoining sites and bears a reasonable proportion of mitigation costs and public realm provision amongst the landowners within the wider allocation.</p>	<p>Noted.</p> <p>Change proposed. It is agreed that there is a need to amend criterion vii of the policy, which deals with comprehensiveness, to deal with the issues related to neighbouring sites.</p>
Chris Bedford	CR13: East Side Major Opportunity Area	Large retail units perform a useful role on edge of centre sites, encouraging those who might otherwise shop out of town to make linked trips that include visiting the centre. The loss in particular of DIY stores is proving a particular blow to those without cars, since these stores themselves killed off hardware shops and small builders' merchants, and the plan is actively promoting this process. Site proposals CR12a and CR13 should be changed to encourage the incorporation of larger scale retail uses into redevelopment.	No change proposed. The policy does allow for retention of the existing uses if necessary, but the aim is to move away from large format retail in this location. CR12a at the Cattle Market has been identified as an edge of centre site for bulky retail.
Environment Agency	CR13: East Side Major Opportunity Area	We are pleased to see reference to buffer zones along the River Kennet in CR13b, Forbury Retail Park and CR13d, Gas Holder. These should both be a minimum of 10 metres in width measured from the top of the river bank. The buffers should be free from development and the ecological value enhanced. Reference should be made to policy EN11: Waterspaces.	It is agreed that reference should be made to EN11, but it should also be recognised that public access along the waterway is a key aim here.
Historic England	CR13: East Side Major Opportunity Area	We welcome, in principle, criteria v) and vi), although we prefer "conserve" to "preserve" as terminology more consistent with the National Planning Policy Framework and as recognising that sensitive change can take place that maintains or even enhances the significance of assets. We would also like to see "which should inform the development" added to the end of criterion vi), as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Agreed. Change proposed. The wording of these criteria should be amended to reflect this.
Historic England	CR13a: Reading Prison	We support 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	No change proposed. The Council does not currently have any clear evidence to show that a conversion to

		<p>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.</p> <p>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.</p>	<p>residential cannot conserve the historic significance of the building, and it is not considered appropriate to identify this as a last resort. At this stage, it is considered the policy needs to be open to various potential uses.</p> <p>It is accepted that an owner or developer may treat a dwelling number as a target, however, it must be considered against policies. It is important to have a figure which can count towards the overall calculations.</p>
Historic England	CR13a: Reading Prison	<p>In addition, whilst we welcome the reference to the historical significance of the building and archaeological interest of the site, there should be a requirement within the policy for any proposals for the re-use of the prison building to conserve or enhance its historic significance. These comments are without prejudice to any comments we may wish to make on any proposals for re-use.</p>	<p>Agreed. Change proposed. The wording of the policy should be changed in line with the suggestion.</p>
Ministry of Justice	CR13a: Reading Prison	<p>An essential element of supporting the wider transformation of justice facilities is to ensure that surplus and vacant justice sites are not strategically constrained by local planning policies. Restrictive policies that prevent and/or limit the re-use of such sites can have the effect of preventing or delaying a viable receipt for identified surplus land.</p> <p>Draft Policy CR13a supports the re-use of the former Reading Prison site for alternative use(s) which the MoJ welcome. As stated above, no future land use(s) or purchaser(s) have yet been identified by the MoJ. We are, therefore, keen to ensure that the Draft Local Plan does not unduly restrict future potential development. We propose the following changes to ensure that it does not improperly restrict future re-use of this site:</p> <p>"The prison building itself is of historical significance and is listed, and will be retained. The building would could be used for residential, commercial offices, or a hotel, student accommodation or other appropriate town centre uses and could include some cultural or heritage element that draws on its significance..."</p>	<p>Partially agreed. Change proposed. It is agreed that the site may lend itself to student accommodation, and the policy should allow for this possibility, as well as other potential uses related to its historic significance.</p>
Reading Urban Wildlife Group	CR13a: Reading Prison	<p>We believe that this site should not be allocated for housing but become a heritage/recreational site so that there is a continuous public space from St Lawrence's churchyard through to the dual carriageway. Continuing footpaths along the Kennet connect this area with Blakes lock. If there must be housing, it should be low level and no parking. Residents should be allocated, if wanted, permits for one car parking space each on the other side of the dual carriageway in the Forbury retail park. The prison area then becomes a pedestrianised area during daylight hours with a</p>	<p>No change proposed. At this stage, much of the development hinges on the vital archaeological significance of the site. The Prison Framework contains as much detail as can be set out at this stage.</p>

		limited time slot for delivery vehicles early in the morning. the design must encourage people other than residents to use the space.	
Thames Water	CR13a: Reading Prison	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Noted. No change proposed. This issue is recognised in criterion ix of policy CR13.
Thames Water	CR13a: Reading Prison	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion ix of policy CR13.
Evelyn Williams	CR13a: Reading Prison	The site is within the area of Reading Abbey designated (1007932) as a scheduled ancient monument (and not just a listed building). A statement to this effect should be included in the New Local Plan in relation to development of this site and the Abbey Quarter.	This policy already refers to the site's status as part of a scheduled ancient monument.
Historic England	CR13b: Forbury Retail Park	According to our records, there are no designated heritage assets on or near this site, but regard should be had to the Historic Environment Record for potential archaeological remains.	Noted. This is covered in criterion vi of policy CR13.
RBS Pension Trustee Ltd	CR13b: Forbury Retail Park	<p>Our client investigated residential led redevelopment of the Site. Given the high existing use value of the established commercial floorspace, it is not economically viable to redevelop the Site for residential land uses in the short to medium term. Furthermore, given the uncertainty linked to longer term forecasts of development costs and values, it is impossible to predict whether a residential led redevelopment of the Site will become viable in the longer term. In light of the above, there can be no certainty that the Site will be available to contribute towards local housing supply over the emerging Local Plan period.</p> <p>Whilst the owner does not object to the proposed identification of the Site as one that offers potential for residential land uses in the future, it is critical that such an allocation does not impact on the established commercial function of the Site. To properly reflect the position above, we would request that the Site is separated from the adjoining retail warehouses to create a new, distinct allocation. The new allocation should acknowledge the Site's established commercial function and the contribution it makes to meeting the commercial requirements of residents within the Reading Central Area and wider Borough.</p> <p>The allocation can support a residential land use but this would not preclude any future commercial development linked to the established role and function of the Site. It is critical that any allocation does not prejudice the owner's ability to meet the operational requirements of existing or new operators as formats and consumer needs evolve and develop. Such requirements</p>	<p>Noted. No change proposed.</p> <p>The current situation with regard to likelihood of development is noted, and it is understood that, if implemented, it will only be in the long-term. However, an allocation is justified given the aims of addressing underused sites on the edge of the centre.</p> <p>It is not agreed that the site needs to be a separate allocation, as many of the MOA sub-areas are in more than one ownership and may come forward separately.</p> <p>It is not considered that the allocation prejudices the ability to meet the operational requirements of the</p>

		<p>may include: the reconfiguration of and / or extension to existing floorspace; changes of use to other commercial classes or variations of conditions relating to opening hours or servicing.</p> <p>Below we set out our proposed revised wording for a new site specific allocation:</p> <p>“Forbury Retail Park Phase 2 is located in the Central Area and makes a positive contribution to meeting the retail and commercial needs of the local population. Given its location, it is suitable for a range of main town centre uses such as retail and leisure as defined by the NPPF.</p> <p>The site is also considered acceptable for residential land uses.”</p> <p>Should the Local Planning Authority consider a separate allocation is inappropriate, we would request that specific reference is made to the Site in the existing allocation.</p>	<p>existing retail park. The existing RCAAAP policy has been in place since 2009, but has not prevented applications being permitted for mezzanine floors, external alterations and a new pod unit. It is important that the long-term aspirations for the site are emphasised.</p>
Thames Water	CR13b: Forbury Retail Park	<p>The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build</p>	<p>Noted. No change proposed. This issue is recognised in criterion x of policy CR13.</p>
Thames Water	CR13b: Forbury Retail Park	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>Noted. No change proposed. This issue is recognised in criterion x of policy CR13.</p>
Thames Water	CR13b: Forbury Retail Park	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>	<p>Noted. No change needed.</p>
Historic England	CR13c: Kenavon Drive and Forbury Business Park	<p>According to our records, there are no designated heritage assets on this site, but it is within the setting of a number of grade II buildings south of Gasworks Road. We would therefore welcome a requirement in the policy 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 the NPPF. In addition, regard should be had to the Historic Environment Record for potential archaeological remains.</p>	<p>Noted. This is covered in criterion v and vi of Policy CR13. Criterion v should be amended to refer to specific types of heritage assets.</p>
Thames Water	CR13c: Kenavon	<p>The water network capacity in this area may be unable to support the demand anticipated from</p>	<p>Noted. No change proposed. This</p>

	Drive and Forbury Business Park	this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	issue is recognised in criterion x of policy CR13.
Thames Water	CR13c: Kenavon Drive and Forbury Business Park	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion x of policy CR13.
Viridis Real Estate Services Limited	CR13c: Kenavon Drive and Forbury Business Park	<p>Viridis welcomes the aim of Policy CR13 to create an area with a more urban character with high density development. However, this vision is not carried through into sub-area Policy CR13c, where the indicative capacity would be between 62 and 91 dwellings per hectare.</p> <p>The site is in central Reading, on the edge of the town centre and therefore has excellent access to services and existing infrastructure, including public transport. The indicative development potential does not reflect other policies in the draft Local Plan (including those relating to density), the NPPF requirement to optimise the development potential of previously developed sites (reinforced by the Housing White Paper) and the fact that the site lies in an opportunity area with significant potential to contribute substantially to meeting the housing needs of Reading. In this context, higher densities can be reasonably delivered.</p> <p>Viridis entered into pre-application discussions with RBC in 2013 and 2016, where they demonstrated that the site could accommodate circa 500 units. This would achieve a density of 240 dwellings per hectare, which is comparable to the density of sub-area Policy CR13b: Forbury Retail Park and the current planning application at the Homebase and Toys R Us site. While it is noted that paragraph 5.4.22 states that the indicative development capacity figures are an indication only, it does not represent the true development potential of the site and will not serve to assist applicants and decision takers alike.</p> <p>On this basis Policy CR13c is not positively prepared, justified or consistent with national policy. The indicative potential for sub-area CR13c should be increased to at least 500 homes.</p>	<p>No change proposed. As is noted, the dwelling figures are an indication, and it may be possible to accommodate more (or less) depending on detailed design. In overall terms, the density is expected to reduce from west to east as the development gets further from the central core, and Policy CR13 talks of medium to high density rather than simply high density.</p> <p>The specifics of the pre-application enquiries are confidential. However, the 2013 scheme did not convince the Council that 500 dwellings were appropriate, in fact the reverse is true.</p> <p>The Council has not sought to design any development on the site, and has used a methodology that is consistent across the Borough. It will be for an applicant to demonstrate that a specific scheme is appropriate.</p>
Viridis Real Estate Services Limited	CR13c: Kenavon Drive and Forbury Business Park	Paragraph 5.4.27 states that the Kenavon Drive Urban Design Concept Statement (UDS) continues to be relevant in the context of the East Side Major Opportunity Area. The UDS was adopted in 2004 and pre-dates the RBC Core Strategy, Central Reading Area Action Plan and the Sites and Detailed Policies Document, as well as the NPPF and indeed a range of recent developments	Partially agreed. Change proposed. It is agreed that elements of the KDUDCS have been overtaken by events. It remains adopted policy, but it should

		<p>within the Opportunity Area.</p> <p>Whilst the broad aims of the UDS are to be supported, the Key Design Principles referred to in Section 4 are set to a urban and housing need context that no longer exists. The reality is that the character and context of the opportunity area has changed since 2004, as has the extent of Reading's housing crisis and as a consequence the development potential of brownfield sites must be optimised to meet these needs. In today's context the UDS has very limited relevance and conflicts with the development plan and NPPF.</p> <p>On this basis Policy CR13c is not positively prepared, justified or consistent with national policy. Reference to the Kenavon Drive Urban Design Concept Statement in paragraph 5.4.27 should be deleted.</p>	<p>be clarified that where there is a conflict with CR13. The Local Plan policy takes precedence.</p>
Environment Agency	CR13d: Gas Holder	This site should have the bullet point "Address any contamination on site" added.	Agreed. Change proposed. This should be highlighted in the policy.
Historic England	CR13d: Gas Holder	According to our records, there are no designated heritage assets on or near this site, but regard should be had to the Historic Environment Record for potential archaeological remains.	Noted. This is covered in criterion vi of policy CR13.
Natural England	CR13d: Gas Holder	Suggested change: "Development will be set back at least ten metres from the river and allow for a wildlife corridor along the river."	No change proposed. It is not clear what this wording change would achieve.
SGN plc	CR13d: Gas Holder	The allocation of the site for residential development is strongly supported.	Noted. No change proposed.
SGN plc	CR13d: Gas Holder	<p>The flexibility in paragraph 5.4.22 is welcomed, as in this instance it is considered that the Gas Holder site is capable of accommodating up to 120 dwellings.</p> <p>In the HELAA, an estimated development capacity of 58 dwellings was derived using the 'pattern book' approach. Whilst no objection is raised to the 'pattern book' approach in principle it is considered that the Gas Holder is a site for which it would be more appropriate to utilise the site-specific manual calculation method for calculating development capacity.</p> <p>Firstly, the Gas Holder site is located at a prominent location in the east of Reading. It is the first part of the central area that is visible for people arriving from the east by rail, and the policy itself also recognises the potential of the site to be a "river gateway" to Reading. The Kenavon Drive Urban Design Concept Statement (July 2004) also recognises the importance of views into the study area. For these reasons the site lends itself to a development which could include a landmark building, as both a rail and river gateway to Reading. This is also supported by the conclusions of the Sustainability Appraisal of the Draft Local Plan (May 2017). A landmark building does not however have to comprise a building that would be defined as a 'tall building' by Reading's existing and emerging planning policy.</p> <p>Initial design options suggest that the site could accommodate a development of several</p>	<p>No change proposed. As is noted, the dwelling figures are an indication, and it may be possible to accommodate more (or less) depending on detailed design.</p> <p>The Council has not sought to design any development on the site, and has used a methodology that is consistent across the Borough. It will be for an applicant to demonstrate that a specific scheme is appropriate. These initial design options have not been submitted to the Local Plan consultation, and it is difficult to judge whether the site can therefore accommodate the level of development suggested,</p>

		<p>apartment buildings, which would step up in height from existing development along Kennet Walk and Robert Parker Road, and increase to up to eight storeys in height towards the mouth of the River Kennet. Based on an initial design feasibility exercise it is envisaged that through such a design, the site could accommodate up to 120 dwellings.</p> <p>Allocating the site for 120 dwellings would help ensure the requirements of the NPPF are met in terms of achieving sustainable development, positively seeking opportunities to meet development needs of an area and helping ensure the efficient use of land. Given Reading is currently falling short of meeting their OAN, it is important that the most efficient use of available sites is made.</p> <p>The desire for the Gas Holder site to be redeveloped as part of the East Side MOA has been established in local planning policy for a number of years. The costs of redeveloping a site such as this are not insignificant, due primarily to the costs associated with dismantling the gas holder and decontamination of the site itself. This would prohibit a traditional low density residential scheme from being a viable alternative.</p> <p>It is noted that the Draft Local Plan suggests the development capacity of the site is indicative only at this stage. Whilst the flexibility that this provides is supported, it is essential that the site is allocated for residential use of sufficient value within the emerging Local Plan to ensure that redevelopment is viable, in order to give certainty to the landowner, developer and all other local stakeholders going forwards. This will also help ensure that redevelopment of the site occurs relatively early in the Plan period. The Local Plan currently refers to the delivery of the site in the medium term (years 2021-26), and subject to the allocation being increased, the assumptions made within the Council's housing trajectory at Figure 10.1 of the Draft Local Plan are supported.</p>	
SGN plc	CR13d: Gas Holder	<p>Whilst the principle of providing public access along the river is supported, some areas of land required to provide a continuous pedestrian connection to the Kennet Mouth beyond the Gas Holder site to the north-east fall in separate ownership to the Gas Holder site itself. Such connections would therefore likely fall outside the control of the Developer.</p> <p>Furthermore, continuous public access along the northern side of the River Kennet up to the Kennet Mouth would require the existing railway to be crossed twice, in locations where no such railway crossings exist at present, either in the form of tunnels or bridges. This would have significant infrastructure costs associated with it, and so would be both unviable and impractical for development of a site of this size to deliver. Notwithstanding the land ownership concerns raised above, it is therefore simply not feasible that the redevelopment of this site could facilitate such connections and so in order to ensure the soundness of the policy, the draft policy wording and Figure 5.5 should be amended accordingly.</p>	<p>No change proposed. It is accepted that some of the necessary land is outside the control of the landowner, but it remains an important policy aspiration to allow access to watercourses that should at least be achieved within the site itself. The Council consider that public access could be created under existing railway bridges using existing openings, so new tunnels or bridges are not required.</p>

SGN plc	CR13d: Gas Holder	<p>In terms of the requirement that development be set back a minimum of 10 metres from the river, it is unclear what is meant by 'development' in this instance. For instance, is this referring solely to buildings, or does it include hard landscaped areas such as pedestrian footways, which would presumably be sought alongside and within 10 metres of the waterway in order to provide the public access to the river referenced above.</p> <p>Given the obvious implications for developable areas, it is also unclear what the justification is for a set back of 10 metres. It is considered that a reduced set back would still allow the creation of a wildlife corridor along the river, whilst ensuring a more effective and efficient use of land. This is particularly important on previously developed sites within the urban area such as this, as encouraged by paragraph 17 of the NPPF, particularly given the significant costs associated with redeveloping sites such as this.</p>	No change proposed. New supporting text to EN11 clarifies what is meant by development in this instance. It could include the creation of pedestrian routes, where the surface is permeable. 10 metres is not particularly significant in the context of the development site, and it is considered that it should be achieved wherever possible.
Thames Water	CR13d: Gas Holder	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Noted. No change proposed. This issue is recognised in criterion x of policy CR13.
Thames Water	CR13d: Gas Holder	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion x of policy CR13.
Thames Water	CR13d: Gas Holder	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	Paragraph 5.4.21	We welcome the recognition of the historically significant sites.	Noted. No change needed.
Environment Agency	CR14a: Central Swimming Pool, Battle Street	This site should have the bullet point "Address any contamination on site" added.	No change proposed. The Council is not aware of any identified potential for contamination. As such it is not a specific constraint identified for this site, and would be dealt with on a case by case basis in line with the pollution policy.
Historic England	CR14a: Central Swimming Pool, Battle Street	We welcome the requirement for development to conserve and where possible enhance the setting of the Conservation Area and nearby listed buildings in the area, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic	Noted. No change proposed.

		environment as required by the NPPF.	
Thames Water	CR14a: Central Swimming Pool, Battle Street	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Agreed. Change proposed. The need to liaise with Thames Water on water infrastructure should be added.
Thames Water	CR14a: Central Swimming Pool, Battle Street	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14a: Central Swimming Pool, Battle Street	The comments above is based on foul water discharge to the public sewer by gravity (NOT PUMPED) and surface water is not discharged to the public sewer.	Noted. No change proposed.
Historic England	CR14b: Former Reading Family Centre, North Street	We welcome the requirement 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 the NPPF.	Noted. No change proposed.
Thames Water	CR14b: Former Reading Family Centre, North Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14b: Former Reading Family Centre, North Street	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14b: Former Reading Family Centre, North Street	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change proposed.
Historic England	CR14c: 17-23 Queen Victoria Street	We welcome the requirement for development to avoid detrimental impacts on the significance of this listed building, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change proposed.
Thames Water	CR14c: 17-23 Queen Victoria Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14c: 17-23 Queen Victoria Street	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14c: 17-23 Queen Victoria Street	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development	Noted. No change proposed.

		identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	
Historic England	CR14d: 173-175 Friar Street and 27-32 Market Place	We welcome the requirements 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 the NPPF.	Noted. No change proposed.
Thames Water	CR14d: 173-175 Friar Street and 27-32 Market Place	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14d: 173-175 Friar Street and 27-32 Market Place	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14d: 173-175 Friar Street and 27-32 Market Place	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change proposed.
Historic England	CR14e: 3-10 Market Place, Abbey Hall and Abbey Square	We welcome the requirements 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 the NPPF.	Noted. No change proposed.
Thames Water	CR14e: 3-10 Market Place, Abbey Hall and Abbey Square	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14e: 3-10 Market Place, Abbey Hall and Abbey Square	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14e: 3-10 Market Place, Abbey Hall and Abbey Square	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the vicinity of Market Place area within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development.	Noted. No change proposed.
Historic England	CR14f: 1-5 King Street	We welcome the requirement 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	Noted. No change proposed.

		required by the NPPF.	
Thames Water	CR14f: 1-5 King Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14f: 1-5 King Street	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14f: 1-5 King Street	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the vicinity of Market Place area within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development.	Noted. No change proposed.
Chris Bedford	CR14g: The Oracle Extension, Bridge Street and Letcombe Street	It is hard to see how the proposed car park as part of an extension to the Oracle can be made compatible with the adjacent Conservation Area without sinking much of it into the ground - something that groundwater issues may make very difficult.	No change proposed. This will need to be assessed in relation to detailed design proposals.
Hammerson Plc	CR14g: The Oracle Extension, Bridge Street and Letcombe Street	<p>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 CR14g should be redrafted to better reflect this (including an increase in quantum of floorspace an extension to The Oracle is capable of delivering). We would propose the following redrafting:-</p> <p>“Development of areas at The Oracle Shopping Centre and on adjoining land for retail. Development should:</p> <p>Address flood risk issues; Enhance the Setting of the Conservation Area; Take account of potential archaeological significance; and Address any contamination on site.</p> <p>3,000 – 7,500m² of retail or town centre uses.”</p>	Partially agreed. Change proposed. Options for other potential extensions have not been assessed by the Council, and it is not considered that a blanket endorsement of extension is appropriate without further detail on what that would entail. Therefore, the supporting text should acknowledge the potential, but state that these should be considered on their merits.
Historic England	CR14g: The Oracle Extension, Bridge Street and Letcombe Street	We welcome the requirements 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 the NPPF.	Noted. No change proposed.
Thames Water	CR14g: The Oracle Extension, Bridge Street and Letcombe Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.

Thames Water	CR14g: The Oracle Extension, Bridge Street and Letcombe Street	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14g: The Oracle Extension, Bridge Street and Letcombe Street	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change proposed.
Historic England	CR14h: Central Club, London Street	We welcome the requirements 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 the NPPF.	Noted. No change proposed.
Thames Water	CR14h: Central Club, London Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14h: Central Club, London Street	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14h: Central Club, London Street	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the vicinity of Market Place area within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development.	Noted. No change proposed.
Historic England	CR14i: Enterprise House, 89-97 London Street	We welcome the requirements 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 the NPPF.	Noted. No change proposed.
Thames Water	CR14i: Enterprise House, 89-97 London Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14i: Enterprise House, 89-97 London Street	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14i: Enterprise House, 89-97 London Street	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the vicinity of Blakes Lock area within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development.	Noted. No change proposed.
Historic England	CR14j: Corner of Crown Street and Southampton Street	We welcome the requirements 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	Noted. No change proposed.

		required by the NPPF.	
Thames Water	CR14j: Corner of Crown Street and Southampton Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14j: Corner of Crown Street and Southampton Street	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14j: Corner of Crown Street and Southampton Street	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change proposed.
Historic England	CR14k: Corner of Crown Street and Silver Street	We welcome the requirements 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 the NPPF.	Noted. No change proposed.
Thames Water	CR14k: Corner of Crown Street and Silver Street	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Noted. No change proposed.
Thames Water	CR14k: Corner of Crown Street and Silver Street	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14k: Corner of Crown Street and Silver Street	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change proposed.
Thames Water	CR14k: Corner of Crown Street and Silver Street	There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer.	Agreed. Change proposed. The supporting text should refer to public sewers potentially crossing the site.
Historic England	CR14l: 187-189 Kings Road	We welcome the requirements 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	Noted. No change proposed.

		required by the NPPF.	
Thames Water	CR14I: 187-189 Kings Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14I: 187-189 Kings Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14I: 187-189 Kings Road	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change proposed.
Environment Agency	CR14m: Caversham Lock Island and Caversham Weir, Thames Side	In bullet point 5, insert 'top of the', to read "Avoid a detrimental impact on the biodiversity value of the River Thames, and set buildings back at least ten metres from the top of the bank of the river" Any development should ensure that there is no impact on the operation of the lock and weir.	Agreed. Change proposed. This wording should be changed.
Historic England	CR14m: Caversham Lock Island and Caversham Weir, Thames Side	We welcome the requirements 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 the NPPF.	Noted. No change proposed.
Bob O'Neill	CR14m: Caversham Lock Island and Caversham Weir, Thames Side	Your designation of the Lock Island as a major landscaping feature is a curious definition. Please could it be also classified as a wildlife habitat and be protected from any plan that is similar to that of c2000 which was going to build a link to a hotel complex around the island.	No change proposed. The island is not a landscape feature in itself, it is part of the Thames Valley landscape feature. As the site has no recognised biodiversity value, it cannot be identified as such.
Thames Water	CR14m: Caversham Lock Island and Caversham Weir, Thames Side	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14m: Caversham Lock Island and Caversham Weir, Thames Side	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CR14m: Caversham Lock Island and Caversham Weir, Thames Side	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change proposed.

Chris Bedford	CR15: The Reading Abbey Quarter	Under CR15c, a viewing platform would add greatly to understanding and enjoyment of the site, and might be provided by agreement with the prison developer, using the prison wall for support.	No change proposed. A viewing platform is not part of the current plans for the area, but a proposal would need to be considered against the policy.
Historic England	CR15: The Reading Abbey Quarter	We strongly welcome 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 the NPPF.	Noted. No change proposed.
Historic England	Paragraph 5.4.37	We welcome this paragraph.	Noted. No change proposed.
Booker Group PLC	6.2: Strategy for South Reading	Chapter 6 confirms that South Reading will be the location for a significant amount of new residential and employment over the plan period. Booker is supportive of this approach and of the objective to accommodate around 3,100 homes in South Reading in the period up to 2036.	Noted. No change proposed.
Reading UK CIC	6.2: Strategy for South Reading	We welcome the policies for South Reading and the corridor of development along the A33 which will bring jobs and affordable housing to regenerate this area. Policies for development along the A33 should recognise this is a major gateway to the town from the motorway and should seek to enhance this role and profile of the town.	Noted. No change proposed. This is set out in Key Principle e.
Reading UK CIC	6.2: Strategy for South Reading	There are substantial employment opportunities in South Reading but further provision is needed for small business units, light industrial, warehousing (given the close proximity to Junction 11 of the M4) that will give employment opportunities to local people. We are particularly concerned about the loss of low costs office space to housing through permitted development. The Plan should monitor this and make some provision for replacement elsewhere other than the Town Centre. In South Reading, Global company relocations are largely catered for by the future opportunities to be found on Green Park and neighbouring sites. If Reading's economy is to expand in the future we must safeguard existing suitable employment sites where ever possible and encourage smart, sustainable knowledge businesses with high levels of economic output relative to footprint.	No change proposed. The vital importance of small business premises is agreed. Policy EM4 seeks to avoid loss of existing premises and to secure additional units wherever possible. An increase in office floorspace outside the centre is also planned.
Reading UK CIC	6.2: Strategy for South Reading	The Council should plan carefully over the use of land in its ownership for example in south Reading, both to enable appropriate employment opportunities as well as affordable housing. The Council should consider putting a policy in its spatial strategy supporting this.	No change proposed. There are opportunities for growth on both Council and privately owned land in South Reading, but it is considered that the plan already seeks to make the most of those opportunities and no new policy is required.
Reading UK CIC	6.2: Strategy for South Reading	The development of the Thames Valley Science Park just south of the M4 outside the Borough could be a catalyst for small technology companies as well as large corporates. The plan should consider if there is enough flexibility and capacity to capitalise on future demand from small technology companies to be based in south Reading	No change proposed. The plan identifies significant amounts of space for new employment uses, as well as supporting the redevelopment of older premises for more modern flexible space. The plan should be amended to

			acknowledge the development of the science park.
Reading Urban Wildlife Group	6.2: Strategy for South Reading	Key Principles: enhancement of environs of A33 and Basingstoke Rd: RUWG agrees with and would develop and emphasise extensive green corridors along these two routes, to balance the proposed 'increased densities' of both residential and commercial areas. The enhancement of these corridors would improve air quality and the appearance of these routes into the centre of Reading.	No change proposed. Whilst green corridors along these routes where possible is agreed (particularly the environs of the watercourses recognised as being of biodiversity significance), there will also be other demands on land directly adjacent to the carriageway, for instance for MRT.
Reading Urban Wildlife Group	6.2: Strategy for South Reading	New and re-newed large scale industrial and warehouse development must include appropriate and sustainable local power generation.	Noted. No change proposed. The requirements for decentralised energy are set out in policy CC4.
Reading Urban Wildlife Group	6.2: Strategy for South Reading	The sequence of small local centres along Basingstoke Rd and Northumberland Avenue should have vastly improved good quality hard landscape features with reliable maintenance and good access. They are significant elements of local life.	Noted. Policy RL1 seeks to promote environmental enhancements of existing centres.
Environment Agency	Paragraph 6.2.1	Another key principle should be added relating to the protection and ecological enhancement of the watercourses in this area. These include the River Kennet, the Foudry Brook and its tributaries, the Holy Brook and the floodplain areas on either side of the A33, along with the network of channels contained within them. Additionally, Fobney Island, the lakes through Green Park and the channel linking from Green Park to the Kennet by Fobney Lock should be included. This should link to an expanded paragraph 6.2.8.	Agreed. The final key principle should be expanded to recognise the need to protect and enhance the watercourse as a multi-functional resource.
Environment Agency	SR1: Island Road Major Opportunity Area	Sites SR1a, 1b and 1c should have the bullet point "Address any contamination on site" added.	Agreed. Change proposed. This should be added to SR1.
Environment Agency	SR1: Island Road Major Opportunity Area	At the end of point iv, add 'and enhance the biodiversity value of the watercourses and their riparian corridors.'	Partly agreed. Change proposed. The potential for enhancement should be highlighted. The criterion already specifically refers to the waterways.
Green Park Reading No.1 LLP	SR1: Island Road Major Opportunity Area	This opportunity area should be focused on B2 and B8 uses and B1 use should be wholly ancillary. GPR understands that whilst previous planning permission for offices secured some capacity on the road network, full consideration should be given to transport mitigation strategies to address the impact of the alternative uses. GPR requests to be consulted on these proposals.	No change proposed. The policy already includes the emphasis on industrial and warehouse use, but it cannot ignore the existing implemented permission. The sub-area policies make clear that it is only SR1c where significant office will be appropriate, in line with the existing permission.
Green Park	SR1: Island Road	GPR notes at paragraph 6.3.3 reference to the potential for the MRT route towards Green Park	No change proposed. It is not agreed

Reading No.1 LLP	Major Opportunity Area	station to be through this site rather than Longwater Avenue. GPR would wholly resist this option - the MRT should be directed to where it would capture most passengers. This would be Green Park and office users rather than the Island Road area which will have much lower employee numbers.	that it is inconsistent with provision of a MRT route further south, which the Local Plan clearly shows as the main option. It should be noted that the permission recently granted at SR1c includes a safeguarded alignment for MRT along its southern boundary.
Highways England	SR1: Island Road Major Opportunity Area	It is proposed that development in the Island Road Major Opportunity Area will provide approximately 120,000 to 150,000 sqm of new business space comprising mainly industrial and warehouse uses. Given the potential impact of the site on the M4 it is requested that any potential adverse impacts to the safe and efficient operation of the SRN be appropriately considered, managed and mitigated, in line with NPPF and Circular 02/2013.	No change proposed. Transport modelling work for the overall levels of development has been completed and has been provided to Highways England.
Natural England	SR1: Island Road Major Opportunity Area	Considering the location and current habitat values of the site it will be essential for an appropriate ecological assessment to be undertaken on this site and all impacts mitigated. Given the proximity to the wetland nature reserve and the river I have concerns about this site.	Agreed. Change proposed. The policy should refer to the need for an ecological assessment.
Roxhill Developments Ltd	SR1: Island Road Major Opportunity Area	The second criteria of Policy SR1 does not accord with the requirements of Paragraph 113 of the National Planning Policy Framework, because it makes no distinction between significant/insignificant effects and does not adopt a criteria-based approach. Our suggested rewording is as follows: "Sensitive design, layout and landscaping should be used in order to minimise the potential for significant adverse effects on the Kennet Meadows major landscape feature".	Change proposed. It is considered that the criterion should be reworded, but it should be in a way that reflects the wording of the policy on major landscape features.
Roxhill Developments Ltd	SR1: Island Road Major Opportunity Area	The third and fourth criteria of Policy SR1 should be amended in order to make clear that they are intended to make reference to significant environmental effects and not insignificant effects. The third criterion should state "Avoid significant negative impacts on drainage..." and the fourth criterion should state "Avoid significant negative effects on biodiversity..."	Not agreed. No change proposed. It is not considered that negative effects on flood risk and biodiversity are acceptable in this location, given the sensitivities of surrounding areas.
Roxhill Developments Ltd	SR1: Island Road Major Opportunity Area	For the sake of consistency with the above comments regarding the references to Mass Rapid Transit on Figure 6.2, the sixth criteria of Policy SR1 should be amended to state "Safeguard land adjacent to A33 and Longwater Avenue which is needed..." in order to be consistent with Figure 4.8.	No change proposed. See response in relation to figure 6.2.
Environment Agency	SR1a: Former Landfill, Island Road	An undeveloped ecological buffer zone a minimum of 10 metres in width, measured from the top of the bank of the watercourse on the eastern boundary should be included in the wording of this sub-policy.	Agreed. Change proposed. This is already shown on the sub-area map and should be included in the policy.
Natural England	SR1a: Former Landfill, Island Road	The height of any warehouse/industrial building on this site should be limited so as to avoid visual impacts to the River Kennet walking trail.	No change proposed. Criterion ii of the policy already ensures that there would not be adverse landscape effects.
Roxhill Developments	SR1a: Former Landfill, Island Road	We support the overall approach to Policy SR1. It is considered that the Island Road Major Opportunity Area represents an opportunity to assist in the management of the relationship	Noted. No change proposed.

Ltd		<p>between employment development and housing in south Reading, in the context of the need for additional employment land and the skills deficit in this area:</p> <ul style="list-style-type: none"> • The HELAA recognises that the identified capacity to provide for industrial and warehousing space in Reading represents a shortfall against identified needs of almost 45,000sqm. This conclusion serves to highlight the importance in meeting need within the sites where capacity has been identified; • The SHMA highlights that, with the development of internet shopping, there has in recent years been a growing demand for Class B8 space for high spec warehousing in Berkshire; • The Sustainability Appraisal concludes that Policy SR1 would bring significant positive effects with regards to economic development and employment and in environmental terms would bring a tendency towards positive effects on CO2 emissions, adaptation to climate change, pollution, the natural environment, landscape character and sustainable transport; • The development would provide employment opportunities across a range of occupation types and skill levels; reflecting the way in which modern large scale commercial developments incorporate a range of usable spaces including for storage, drivers and office-based staff; • The development represents an opportunity to contribute towards objectives that are set out in the Thames Valley Berkshire LEP's Strategic Economic Plan, including addressing the pockets of economic activity and unemployment in Reading, where 360 (8.4%) of 16-18 year olds are not in education, employment or training; recognising the importance of the connectivity of the area for the growth of the economy, particularly links to London including the M4; and acknowledging that the Reading/Wokingham/Bracknell urban area is a major centre of economic activity with significant potential for future growth; • It is assumed that 60% of the future workforce for the Island Road MOA would commute from within 20km; equating to a 30 minute drive time. By looking at the occupation profile within a 20km radius of the site and identifying those residents currently seeking employment it is possible to understand the potential labour supply. Within this area there are around 380,330 residents (aged 16 to 74) within employment, including 16,500 employed within the transport and storage sector. The average proportion of residents across the South East working within this sector is 5.2%. Based on this average, areas within the 20km radius which exhibit an above average proportion of residents working within the industry have been identified; • It is evident that a large area within Reading has a higher than average proportion of residents employed within the transport and storage sector. There are particular opportunities to make connections between the Island Road MOA and existing areas within the southern part of Reading with concentrations of residents seeking employment in this sector. 	
Roxhill Developments	SR1a: Former Landfill, Island Road	Policy SR1 gives an "indicative potential" for floorspace within sub-area SR1a of 95,000-117,000sqm. This figure is broadly in accordance with the HELAA. However the HELAA's	No change proposed. As is noted, the figures are an indication, and it may

Ltd		suggestion that 76,752sqm of floorspace could be provided within Plot WH017 is not accepted. Feasibility plans that have been submitted to and discussed with RBC as part of the pre-application process have shown that 99,627sqm of floorspace could be provided within Plot WH017. In order to resolve this discrepancy, it is considered that the figures should be increased by 22,875sqm to "117,875-138,875sqm of industrial/warehouse use";	be possible to accommodate more (or less) depending on detailed design. The Council has not sought to design any development on the site, and has used a methodology that is consistent across the Borough. It will be for an applicant to demonstrate that a specific scheme is appropriate. In this case, the amount of development that this site can accommodate will be influenced by effects on landscape and neighbouring residential, which will require detailed consideration at application stage.
Roxhill Developments Ltd	SR1a: Former Landfill, Island Road	The text on SR1a concludes by commenting that "Development should be considered as a comprehensive whole". It is considered that the meaning of this comment is unclear. Moreover, it might be construed as an unnecessary constraint to development, given that (a) Sites WH017 and WH047 are in different ownerships and (b) in practice commercial occupiers may be identified for different parts of sub-area SR1a at different times. In order to responding to the objective of ensuring that the whole sub-area can be developed in due course, it is considered that the comment should be amended to "Access to the development should be considered as a comprehensive whole";	No change proposed. Whilst applications may come forward at different times, the three elements of the site are intrinsically linked, and it would need to be clear how this relationship is to operate.
Thames Water	SR1a: Former Landfill, Island Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. SR1 will need to refer to water supply issues in relation to SR1b and SR1c.
Thames Water	SR1a: Former Landfill, Island Road	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Agreed. Change proposed. This should be picked up in a new criterion in policy SR1.
Thames Water	SR1a: Former Landfill, Island Road	Where development is being proposed within 800m of a sewage treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.	Agreed. Change proposed. This should be picked up in the criteria in policy SR1.
Environment	SR1b: North of	In the second sentence, insert 'undeveloped ecological' between "strong" and "buffer".	Agreed. Change proposed. The

Agency	Island Road	Additionally, an undeveloped ecological buffer zone a minimum of 10m in width measured from the top of the river bank is required between any development and the watercourse to the west of the site.	wording should be changed to address this, although it is not considered that referring to 10 metres is possible in this case, as permission has been granted for a development on the site which is slightly closer than 10 metres.
Natural England	SR1b: North of Island Road	The height of any warehouse/industrial building on this site should be limited so as to avoid visual impacts to the River Kennet walking trail.	No change proposed. Criterion ii of the policy already ensures that there would not be adverse landscape effects.
Thames Water	SR1b: North of Island Road	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Agreed. Change proposed. This should be picked up in a new criterion in policy SR1.
Thames Water	SR1b: North of Island Road	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Agreed. Change proposed. This should be picked up in a new criterion in policy SR1.
Thames Water	SR1c: Island Road A33 Frontage	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Agreed. Change proposed. This should be picked up in a new criterion in policy SR1.
Thames Water	SR1c: Island Road A33 Frontage	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Agreed. Change proposed. This should be picked up in a new criterion in policy SR1.
Thames Water	SR1c: Island Road A33 Frontage	The development being proposed within 800m of a Reading Sewage Treatment Works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers	Agreed. Change proposed. This should be picked up in the criteria in policy SR1.

		would be located in closer proximity to a sewage treatment works.	
Thames Water	SR1c: Island Road A33 Frontage	There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer	Agreed. Change proposed. The issue of public sewers should be highlighted in the supporting text.
Thames Water	SR1c: Island Road A33 Frontage	We would be concerned about development in proximity to the river intake and groundwater protection zone for Fobney WTW.	Agreed. Change proposed. This should be recognised in the policy.
Roxhill Developments Ltd	Figure 6.2	Figure 6.2 identifies the area of land to the immediate north of sub-area SR1a as "Nearby sensitive location - wildlife and landscape". However feasibility plans that have been submitted to and discussed with RBC as part of the pre-application process have shown that part of this area could accommodate a new wetland area as part of the Sustainable Drainage Strategy for sub-area SR1a. This wetland area would enable a number of benefits to be realised, including benefits for water management and ecology, together with a more efficient layout within sub-area SR1. As a consequence, it is considered that the key relating to this area should be amended to "Nearby sensitive location - wildlife, landscape and drainage features";	No change proposed. This element of the diagram shows existing sensitivities, and the landscape and wildlife sensitivity of this location is well established. The appropriateness of using this area as a part of a drainage strategy will need to be considered in full at planning application stage.
Roxhill Developments Ltd	Figure 6.2	The reference to a "Potential alternative Mass Rapid Transit route" along Island Road and through sub-area SR1a should be amended. It is inconsistent with the current focus on the route along the A33 corridor and the alignment of the unnecessarily wide curve along the north west corner of sub-area SR1a would also restrict the amount of economic development that could be realised within sub-area SR1A.	No change proposed. It is not agreed that it is inconsistent with provision of a MRT route further south. The map is not attempting to show a specific route, merely the potential to go through the site. It should be noted that the permission recently granted at SR1c includes a safeguarded alignment for MRT along its southern boundary.
Highways England	SR2: Land North of Manor Farm Road Major Opportunity Area	It is proposed that the Manor Farm Road site will be re-developed to provide between 680 and 1,020 dwellings, as well as some retail and leisure uses. Given the potential impact of the site on the M4 it is requested that any potential adverse impacts to the safe and efficient operation of the SRN be appropriately considered, managed and mitigated, in line with NPPF and Circular 02/2013.	No change proposed. Transport modelling work for the overall levels of development has been completed and has been provided to Highways England.
Historic England	SR2: Land North of Manor Farm Road Major Opportunity Area	We welcome the requirement 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 the NPPF.	Noted. No change needed.
Reading Urban Wildlife Group	SR2: Land North of Manor Farm Road Major Opportunity Area	There should be an enhanced environment with new planting, pleasant pedestrian/cycle access routes and spaces for relaxation and informal recreation.	Change proposed. The need for public realm improvements should be highlighted in the policy.

	Area		
Royal Mail	SR2: Land North of Manor Farm Road Major Opportunity Area	Royal Mail's Reading Delivery Office is included within the proposed site area. Royal Mail confirms that there are currently no plans in their strategy to relocate the Reading Delivery Office. As such, Royal Mail is understandably concerned regarding the direct implications that the proposed redevelopment may have on their current operations at this location. Royal Mail would therefore welcome engagement with the Council to secure protection of their business and/or ensure that alternative provision can be provided to safeguard their future operations within Reading Borough.	No change proposed. The proposals for Land North of Manor Farm Road are likely to be long-term, and it is understood that there are no immediate plans to relocate. It should be noted that the Local Plan provides for a significant amount of new B2/B8 space at Island Road that may be capable of offering alternative provision.
Thames Water	SR2: Land North of Manor Farm Road Major Opportunity Area	The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build	Noted. Change proposed. The policy criteria should highlight the need to consider impact on water infrastructure.
Thames Water	SR2: Land North of Manor Farm Road Major Opportunity Area	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. No change proposed. This issue is recognised in criterion ix of policy SR2.
Thames Water	SR2: Land North of Manor Farm Road Major Opportunity Area	This Development is likely to be above the current water treatment capacity to supply and would require significant investment to supply.	Noted. No change proposed. This issue is recognised in criterion ix of policy SR2. The site is likely to be a longer-term development opportunity.
Thames Water	SR2: Land North of Manor Farm Road Major Opportunity Area	There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	Agreed. Change proposed. A new paragraph should be added to the supporting text to highlight this issue.
Wokingham Borough Council	SR2: Land North of Manor Farm Road Major Opportunity Area	This development should be given special consideration in the context of any Infrastructure Delivery Plan and the impacts to be mitigated upon Wokingham Borough Council in the Development Management Policies.	Noted. No change proposed.

Booker Group PLC	SR3: South of Elgar Road Major Opportunity Area	Booker welcome the allocation for residential use. The site provides an opportunity to provide much needed housing within the borough and is in an appropriate location to deliver this.	Noted. No change proposed.
Booker Group PLC	SR3: South of Elgar Road Major Opportunity Area	Policy SR3, in its current form, does not allow sufficient flexibility for other uses to also be delivered on the site as part of a mixed use scheme in the future. Booker consider that a well-designed scheme could incorporate both residential and commercial elements (including a replacement Makro store), and request that this is reflected in the Draft Local Plan. The most obvious way that this could be accommodated is with commercial uses located on the southernmost part of the site close to existing employment uses, with a buffer to residential uses relating to Elgar Road. However, there is also potential for a well-designed high density scheme, with commercial use at ground floor level and residential use above to be delivered on the site. Booker would therefore request that the following wording is added to Policy SR3: "There may be potential for commercial uses to be part of the long-term future of the site, although this will rely on effective management of the relationship between residential and commercial uses."	Partially agreed. Change proposed. It is considered that the emphasis of the allocation should remain on a residential future for the site, but it is agreed that a change should be made to deal with the situation in which commercial is proposed as part of a mix.
Booker Group PLC	SR3: South of Elgar Road Major Opportunity Area	Booker request that sufficient flexibility is provided in the wording of the policy to allow an appropriate redevelopment scheme to be delivered, whether this involves separate residential and commercial uses, or a more integrated approach. We acknowledge that residential amenity should not be compromised, but considered that appropriate flexibility is provided for this to be dealt with by a buffer between different uses, or by other suitable means. We would therefore request that section i) of Policy SR3 is amended to the following: "Development will: i) Ensure that there is an appropriate buffer between new residential development and any adjacent industrial and warehouse uses, or other suitable mitigation is used, to ensure that there are no adverse effects on residents as a result of noise and disturbance and the visual impact of business uses."	Partially agreed. Change proposed. It is possible that there may be other appropriate measures (although this is unlikely to be the case where commercial is large-scale). Slightly different wording is proposed.
Booker Group PLC	SR3: South of Elgar Road Major Opportunity Area	It is welcomed that the Council confirm that the quantum of residential units (330-500) to be provided within the site allocation is indicative. The number of dwellings to be delivered on the site would be dependent on the scale, massing and quantum of development which includes other uses as part of a mixed use development and the Opportunity Area being redeveloped in its entirety, including both the Makro site and adjacent land in separate ownership. The flexibility provided by setting out an indicative range, in relation to the capacity of the site, is therefore welcomed.	Noted. No change proposed.
Booker Group PLC	SR3: South of Elgar Road Major Opportunity Area	Policy SR3 does not make any reference to the timeframe in which development is expected to come forward on the site. In this respect, it is not anticipated that the Makro site will be available for redevelopment in the short term as existing operations are likely to continue for some years. However, the site could be available for a residential-led redevelopment towards the end of the plan period and Booker therefore request that this is highlighted by Policy SR3.	Agreed. Change proposed. The supporting text should recognise that this is likely to represent a longer-term opportunity.
Environment	SR3: South of Elgar	In point ii, insert 'ecological' between "landscaped" and "boundary".	Agreed. Change proposed. This

Agency	Road Major Opportunity Area		wording should be added.
Highways England	SR3: South of Elgar Road Major Opportunity Area	It is proposed that 330-500 dwellings would be provided on the South of Elgar Road site. Given the site location, it is unclear whether or not they will impact the SRN, either individually or cumulatively. Ahead of the Revised Draft Local Plan stage we would like to work with you to assess the potential impacts of this site on the SRN and consider any potential SRN mitigation measures that may be needed to successfully deliver the sites. This is required to demonstrate how any adverse impacts to the safe and efficient operation of the SRN will be managed and mitigated.	No change proposed. Transport modelling work for the overall levels of development has been completed and has been provided to Highways England.
Historic England	SR3: South of Elgar Road Major Opportunity Area	We welcome the requirement 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 the NPPF. We would, however, like to see "which should inform the development" added to the end of criterion v).	Agreed. Change proposed. This wording should be added.
Reading Urban Wildlife Group	SR3: South of Elgar Road Major Opportunity Area	RUWG agrees on the importance of high quality landscape boundary treatment of Waterloo Meadows.	Noted. No change proposed.
Thames Water	SR3: South of Elgar Road Major Opportunity Area	The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.	Noted. Change proposed. The policy criteria should highlight the need to consider impact on water infrastructure.
Thames Water	SR3: South of Elgar Road Major Opportunity Area	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Noted. Change proposed. The policy criteria should highlight the need to consider impact on wastewater infrastructure.
John Wilkins	SR3: South of Elgar Road Major Opportunity Area	The housing development in Elgar Road South is very sensible.	Noted. No change proposed.
Environment Agency	SR4a: Pulley Park, Rose Kiln Lane	Amend the first bullet point to read "Include a landscaped ecological buffer a minimum of 10 metres in width to the River Kennet, measured from the top of the bank of the watercourse, to ensure no detrimental impacts ..." Omit "wherever possible" at the end of the sentence in this bullet point.	Partly agreed. Change proposed. The reference to a 10m buffer should be included. However, it should be borne in mind that between the site and the river is a tarmacked towpath, so the site cannot deliver a 10m ecological buffer to the river bank.

Environment Agency	SR4a: Pulleyn Park, Rose Kiln Lane	Amend the second bullet point to read “include ecological enhancements to the stream and its associated river corridor that runs through the site linking the Holy Brook and the River Kennet. This shall include an undeveloped ecological buffer zone of at least 10 width on both sides of the watercourse.”	Partly agreed. Change proposed. Reference should be made to ecological enhancements. However, where this substantial net gain is already a requirement, a prescriptive approach is not considered appropriate.
Historic England	SR4a: Pulleyn Park, Rose Kiln Lane	We welcome the requirement 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 the NPPF.	Noted. No change proposed.
Reading Urban Wildlife Group	SR4a: Pulleyn Park, Rose Kiln Lane	RUWG agrees with the proposed landscape buffer to the Local Wildlife Site and the River Kennet, and the proposed green link to the stream between the Holy Brook and the Kennet. We strongly recommend enhanced hard and soft landscape works to upgrade the area generally, and the development of realistic green corridors linking across the Borough.	Noted. No change proposed.
Thames Water	SR4a: Pulleyn Park, Rose Kiln Lane	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Agreed. Change proposed. The need to liaise with Thames Water on water infrastructure should be added.
Thames Water	SR4a: Pulleyn Park, Rose Kiln Lane	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	SR4a: Pulleyn Park, Rose Kiln Lane	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change proposed.
Historic England	SR4b: Rear of 3-29 Newcastle Road	We welcome the requirement 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 the NPPF.	Noted. No change proposed.
Thames Water	SR4b: Rear of 3-29 Newcastle Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	SR4b: Rear of 3-29 Newcastle Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	SR4b: Rear of 3-29 Newcastle Road	There are Thames Water assets near this site.	Noted. No change proposed.
Historic England	SR4c: 169-173 Basingstoke Road	We welcome the requirement 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 the NPPF.	Noted. No change proposed.

Reading Urban Wildlife Group	SR4c: 169-173 Basingstoke Road	Add: the residential re-development should provide decent quality landscaping, to ensure a good setting for residents with improved air quality and space for outdoor informal activities and relaxation.	No change proposed. Good quality landscaping should certainly be included within a development, in line with CC8 and EN14, but this is true for all sites. The purpose of these criteria is to highlight specific elements that apply to some sites but not others.
Thames Water	SR4c: 169-173 Basingstoke Road	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Agreed. Change proposed. The need to liaise with Thames Water on water infrastructure should be added.
Thames Water	SR4c: 169-173 Basingstoke Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	SR4c: 169-173 Basingstoke Road	There are Thames Water assets near this site.	Noted. No change proposed.
Environment Agency	SR4d: 16-18 Bennet Road	This site should have the bullet point "Address any contamination on site" added.	Agreed. Change proposed. This should be added.
Historic England	SR4d: 16-18 Bennet Road	We welcome the requirement 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 the NPPF.	Noted. No change proposed.
Thames Water	SR4d: 16-18 Bennet Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	SR4d: 16-18 Bennet Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Arlington Business Parks GP Limited	SR4e: Part of Former Berkshire Brewery	<p>It is considered that the appropriate land uses within allocated site SR4e should not be overly restrictive and should allow for flexible, employment generating uses which would help to promote and meet the economic objectives of the Council. Hotel (C1) uses should be included within the appropriate list of uses at the site, as well as other high quality employment generating uses such as sui generis and retail uses that may be appropriate at this site. This would provide for a wider range of appropriate employment opportunities for local residents and also further encourage high quality employment development to locate on nearby sites.</p> <p>The NPPF clearly recognises the importance of building a strong, responsive and competitive economy (paragraph 7, 9, 14 and, in particular 21 (third bullet point)).</p> <p>The current allocation does not provide sufficient flexibility to adapt to changes in economic circumstances as it is overly restrictive in the uses that it indicates would be acceptable at this site. The policy should include sufficient flexibility to allow development to be viable on the</p>	Partially agreed. Change proposed. There can be a recognition that commercial uses can extend to uses that are not necessarily 'pure' employment in order to achieve a high quality frontage to the A33 and a beneficial use of the site. However, specifically identifying the site for retail or hotel would require the sequential test and impact assessment, given its out of centre location. We consider that there are sufficient central sites for these uses at present. It would be for an

		<p>allocation site in line with NPPF paragraphs 19 and 22.</p> <p>It is noted that paragraph 160 of the NPPF it states that “local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area” and should work closely with Local Enterprise Partnerships and the business community to understand the existing and changing needs of businesses.</p> <p>On this basis it is considered that the appropriate land uses within allocated site SA2b of the SDPD should remain as detailed, but moving forward with the Draft Local Plan, the addition of Hotel and sui generis which would provide for a wider range of appropriate employment and amenity opportunities for local residents and also further encourage high quality employment development to locate on nearby sites.</p>	applicant to justify such provision through the policy tests.
Environment Agency	SR4e: Part of Former Berkshire Brewery	Various watercourses adjoin this site; undeveloped buffer zones a minimum of 10 metres in width should be established between any development and the top of the bank of the watercourses and these buffers and the watercourses themselves should have ecological enhancements applied.	Agreed. Change proposed. Reference to a landscaped buffer should be included.
Highways England	SR4e: Part of Former Berkshire Brewery	As site SR4e is located immediately to the north of the M4 we would like to be consulted about any planned change and/or intensification of use beyond the existing site planning permissions	Noted. No change proposed.
Historic England	SR4e: Part of Former Berkshire Brewery	We welcome the requirement for development to enhance the setting of the grade II 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 the NPPF.	Noted. No change proposed.
Thames Water	SR4e: Part of Former Berkshire Brewery	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	SR4e: Part of Former Berkshire Brewery	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
The Englefield Estate	SR4f: Land Southwest of Junction 11 of the M4	<p>In accordance with the NPPF, the Local Plan must plan to meet its objectively assessed need in full, by identifying land for 699 homes per annum as a minimum.</p> <p>The level of housing proposed within the Draft Plan is only 658 dpa, leaving a shortfall over the Plan period of nearly 1,000 dwellings. These will need to be accommodated within adjoining Boroughs, and the majority within the Western Housing Market Area (HMA) from which the need arises i.e. Wokingham Borough and/or West Berkshire.</p> <p>The West of Berkshire Spatial Planning Framework recognises that a significant proportion of new development will need to be located on greenfield land and will include sites brought forward collaboratively to deliver the scale of growth required. Land at Grazeley is identified as an ‘opportunity area’ for a major housing and mixed use development. The identification of land within adjoining authorities and close to the existing urban area of Reading, is considered to</p>	Noted. No change proposed.

		represent the most appropriate response to Reading's inability to meet its needs and to deliver the shortfall. The Estate therefore wishes to express support for the references made within the Draft Plan for development at Grazeley, primarily at Policy SR4(f) but also in paragraphs 6.1.6, 6.2.1(d), 6.2.12, and 6.3.16.	
Environment Agency	SR4f: Land Southwest of Junction 11 of the M4	There is a watercourse along the south east boundary of this site. This would require an undeveloped buffer zone a minimum of 10 metres in width between any development and the top of the bank of the watercourse, with ecological enhancement applied.	Agreed. Change proposed. This should be added to the policy.
Highways England	SR4f: Land Southwest of Junction 11 of the M4	The West of Berkshire Spatial Planning Framework identifies an opportunity for a major new garden village containing up to 15,000 new homes on land around Grazeley, south of the M4 and within the areas of Wokingham Borough Council and West Berkshire Council. The Local Plan notes that 'it will be for the local plans for those areas to determine whether such a development is appropriate, and, if so, what the parameters should be'. We would welcome an opportunity to work with RBC, Wokingham Borough Council and West Berkshire Council to ensure that the impact of this site on the SRN is appropriately considered, managed and mitigated in line with NPPF and Circular 02/2013.	Noted. No change proposed. The three authorities will need to work with Highways England as the proposal evolves.
Historic England	SR4f: Land Southwest of Junction 11 of the M4	We welcome the requirement 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 the NPPF.	Noted. No change proposed.
Office of Nuclear Regulation	SR4f: Land Southwest of Junction 11 of the M4	I would bring to your attention the possibility that ONR may object to the proposed Grazeley Garden Village (as described in the Expression of Interest presented by Wokingham, West Berkshire and Reading Councils in July 2016) during the forthcoming Preferred Options public consultation relating to the Wokingham BC Local Plan Update. Such an objection may relate to the whole or part of the proposal and would be determined by ONR's view on the potential impact of the development on the implementability of the off site emergency planning arrangements for the AWE Burghfield site.	Noted. No change proposed. As stated in the policy, the site is primarily in adjoining authorities and this will need to be considered within those plans.
Thames Water	SR4f: Land Southwest of Junction 11 of the M4	Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the water infrastructure needs relating to the Local Plan.	Noted. No change proposed. As set out in the policy, the site is almost entirely within neighbouring authorities, and liaison with Thames Water will need to relate to the development as a whole. Identification within the Reading Local Plan merely relates to the role that the site may play in the future as part of a wider scheme, and is not a development allocation in itself.
Thames Water	SR4f: Land Southwest of Junction 11 of the M4	Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's	

		aspiration for each site. For example, an indication of the scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to discuss the wastewater infrastructure needs relating to the Local Plan.	
Wokingham Borough Council	SR4f: Land Southwest of Junction 11 of the M4	This development should be given special consideration in the context of any Infrastructure Delivery Plan and the impacts to be mitigated upon Wokingham Borough Council in the Development Management Policies.	Noted. It is unclear what is being referred to here. The development is almost entirely within Wokingham and West Berkshire, and as a result, the Grazeley proposal will not result in development in Reading impacting on Wokingham infrastructure. The IDP is a living document and will need to be updated if and when the development of the substantive part of Grazeley is identified in Wokingham and West Berkshire's local plans.
Reading Urban Wildlife Group	SR5: Leisure and Recreation Use of the Kennetside Areas	RUWG considers it is vital to preserve the wildlife and landscape of this area. It is too fragile and not at all suitable for any development, including developments related to recreation use.	No change proposed. The river Kennet area is important for wildlife and landscape, but also for recreation, and it is important to strike a balance. Part of the area is an existing developed site which is vacant. The criteria in the policy allow these issues to be judged at application stage.
Reading Urban Wildlife Group	SR5: Leisure and Recreation Use of the Kennetside Areas	RUWG supports the precautionary conditions listed, and would emphasise the need to limit strictly any new built facilities to essential use only. We strongly object to the suggestion of a marina along the Kennet here. It is important to retain this rural wedge into Reading, to protect and enhance the biodiversity, and to protect the quality of the water.	No change proposed. This policy identifies the possibility of a marina, but this would still need to be judged against the criteria in the policy.
Environment Agency	Paragraph 6.3.19	With regard to any proposed marina development, consideration would have to be given to the potential for additional boat traffic to have a deleterious impact on the River Kennet Site of Special Scientific Interest further upstream.	Agreed. Change proposed. This reference should be added to the policy.
Historic England	Paragraph 7.2.1	We welcome key principle g. as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change proposed.
Environment Agency	Paragraph 7.2.7	The Holy Brook and the Kennet floodplain/Kennet and Fobney Meadows should be included in the wording of this paragraph.	Agreed. Change proposed. These references should be added, although the reference would be to the Kennet Meadows only, consistent with the rest of the plan.
Historic England	Paragraph 7.2.7	We welcome the commitment to the "preservation" of important heritage assets, including four conservation areas and a historic park, although we prefer the term "conserved" to reflect	Agreed. Change proposed. This reference should be amended.

		better the terminology of the NPPF and as recognising that sensitive change can take place that maintains or even enhances the significance of heritage assets.	
Natural England	Paragraph 7.2.9	Is it possible to say something somewhere about the main road entrances to Reading and that they should be improved visually and environmentally to give a good first impression of Reading? If you arrived along Oxford Road, the closer you get to the centre the more run down the streetscape gets.	No change proposed. Oxford Road West is a designated district centre, and policy RL1 promotes environmental enhancements of some centres.
Sport England	WR1: Dee Park	Sport England would encourage the Council to confirm in the policy that any existing playing field and sports facilities within the development area will be protected or replaced. The Council should use its Built Facilities Strategy and Playing Pitch Strategy to set out in the Local Plan to explain which sports facilities will be brought forward to benefit the community.	No change proposed. It should be noted that this development is already covered by an outline planning permission.
Thames Water	WR1: Dee Park	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	No change proposed. The scale of development identified in the policy already has planning permission.
Thames Water	WR1: Dee Park	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR1: Dee Park	Thames Water have upgraded infrastructure downstream of this site to accommodate the proposed development. Further consultation would be required if changes to the previously proposed development were made.	Noted. No change proposed.
Jenny Cottee	WR2: Park Lane Primary School, The Laurels and Downing Road	<p>This outline proposal is far too sketchy. It is not supported by background data, and so is not an acceptable element of the Local Plan. It should be removed entirely.</p> <p>The scheme proposes that a significant area of land is taken out of use for primary education and is transferred from the public realm to housing purposes. Such significant loss of opportunity to use land for education purposes should only be permitted with the support of careful analysis of future need in the light of increased population. The scheme also involves the loss of maintained sector Early Years places. Currently there is Early Years provision both at the Laurels and at Blgrave Nursery school. No reduction in Early Years places would be acceptable. There is no supply of spare land available in the vicinity if it emerges that there are insufficient primary school and early years places. It would be less bad to continue with the separate junior and infants schools than to have no places available locally.</p>	No change proposed. The benefits of the scheme in terms of consolidation on a single site have been set out previously and are outlined in the supporting text. This was discussed at the Examination into the SDPD and, with modifications (which remain in the Local Plan) was considered to be justified and effective. A Playing Pitches Strategy is in production which looks at Downing Road.
Jenny Cottee	WR2: Park Lane Primary School, The Laurels and Downing Road	I am further dismayed that the plan does not state that replacement community facilities will be provided-the library and health clinic should be replaced at least on a like for like basis. Tilehurst is poorly provided with community facilities. It is not acceptable to transfer land from community facilities to housing.	Agreed. Change proposed. The proposal is intended to include a replacement library and clinic (as set out in the supporting text) and this should be clarified in the policy.
Jenny Cottee	WR2: Park Lane	Regarding Downing Rd playing field, its value lies not only in the fact that it could be used as a	No change proposed. The need for

	Primary School, The Laurels and Downing Road	<p>playing field but also in the sense of openness and a breathing space in the densely built-up area. Whilst use this playing field for development is discussed in para 7.3.9 the problem of compensatory provision for the loss of open space (under the current policy CS28 or the new policy EN8) has been avoided. This compensatory provision would be a requirement if the scheme were to proceed. Without mention of this requirement the scheme is unacceptable.</p>	<p>compensatory provision is recognised in the policy, both in terms of providing playing fields on site, and contributions to qualitative improvements elsewhere.</p>
Liz Ellis	WR2: Park Lane Primary School, The Laurels and Downing Road	<p>In a previous plan there was a proposal to remove Park Lane School from its current site and to replace it with a new school on the Laurels site. This was then locally a very unpopular proposal. It still is now.</p> <p>In the previous version of the Local Plan Downing Road Playing fields should have been protected as open space by CS28. The fact that the Core Strategy documents have since been replaced by EN8 makes no difference: according to EN8, Downing Road Playing Fields should be protected. There is no other suitable land to replace the playing fields in the area so once the fields are gone there will be no possibility of replacing it with any other playing fields. The playing fields at the new site - the Laurels are smaller, and will barely serve as suitable playing fields for a Primary school.</p> <p>It cannot but be obvious that the increase in the number of dwellings in the area will produce a bigger number of residents, and children, in the area. If the Education establishments reduce the amount of land that is available for Infants, Junior and Primary schools, which is what would happen if the current Park Lane school is sold for dwellings, then the future for our children will be exceedingly bleak. This is an extremely shortsighted proposal.</p> <p>It must also be said that the additional housing that is proposed by West Berkshire, to be built abutting Tilehurst, will not only put enormous pressure on the Tilehurst schools but also the other services, doctors, dentists, pharmacies etc etc. It seems that West Berkshire have no intention of providing these services themselves and will rely on Tilehurst to make such provision.</p> <p>This whole part of the plan is an ill thought out mess.</p> <p>As a suggestion, it would be a good idea to move the British Legion and its car park to different part of Tilehurst (eg. on the Meadway off Church End Lane, by the church of the Latter Day Saints), therefore freeing up the area of land between Park Lane School and Downing Road Playing field. This would allow additional space to provide for a sensibly sized Junior school and for an Infants school on the enlarged school site. This would also allow the Laurels site to provide for Junior education at a later stage when the inevitable shortage of school places requires it.</p>	<p>No change proposed. The benefits of the scheme in terms of consolidation on a single site have been set out previously and are outlined in the supporting text. This was discussed at the Examination into the SDPD and, with modifications (which remain in the Local Plan) was considered to be justified and effective. A Playing Pitches Strategy is in production which looks at Downing Road.</p> <p>The proposal does not involve reducing the education places available. It is recognised that the overall level of development proposed in Reading results in a need for education provision. This is recognised in the Infrastructure Delivery Plan, and further work will be undertaken on specific proposals.</p> <p>The British Legion site is in private ownership, and there are no indications that the site is likely to be available in the plan period.</p>
Sport England	WR2: Park Lane Primary School, The	<p>It is noted that a former playing field at Downing Road has an allocation for development. Sport England recommends that the Council wait until the completion of the Playing Pitch Strategy</p>	<p>No change proposed. The Playing Pitch Strategy is underway, and has</p>

	Laurels and Downing Road	before allocating this site for development. Sport England therefore objects to this policy as currently worded. Sport England welcomes the Council's intention to allocate no other playing fields in the Borough for development.	looked at this site in particular. The proposed consolidated school site would include playing fields, and the policy also states that there will be compensation in terms of qualitative improvements. This was discussed at the Examination into the SDPD and, with modifications relating to justification of loss within national policy (which remain in the Local Plan) was considered to be justified and effective.
Thames Water	WR2: Park Lane Primary School, The Laurels and Downing Road	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Agreed. Change proposed. This should be highlighted in the policy.
Thames Water	WR2: Park Lane Primary School, The Laurels and Downing Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
John Wilkins	WR2: Park Lane Primary School, The Laurels and Downing Road	I am concerned at the loss of recreation ground space in the proposed rebuilding/relocation of Park Lane School to the Laurels site. There appears to be no compensating increase elsewhere and I assume that the playing field space associated with the new school will not be available for unrestricted public use.	No change proposed. The loss of open space would be of a playing field which is not available for public use. The proposed consolidated school site would include playing fields, and the policy also states that there will be compensation in terms of qualitative improvements. This was discussed at the Examination into the SDPD and, with modifications relating to justification of loss within national policy (which remain in the Local Plan) was considered to be justified and effective.
Bell Tower Community Association	WR3a: Former Cox and Wyman Site, Cardiff Road WR3b: 2 Ross Road	We welcome the proposals for a greater separation between the industrial and residential parts of our area, which would also prevent rat-running from Richfield Avenue caused by the widening of the Cow Lane bridges.	Noted. No change proposed.

	& part of Meadow Road WR3c: 28-30 Richfield Avenue		
Bell Tower Community Association	WR3a: Former Cox and Wyman Site, Cardiff Road WR3b: 2 Ross Road & part of Meadow Road	As far as access to open space for recreation goes, the development of the strip comprising Cox & Wyman, 2 Ross Road and part of Meadow Road (WR3b) as well as area CR11f should provide publicly accessible open spaces which are lacking in our area as the council points out in its assessment of access to open space Central Reading (4.2.36) We therefore welcome the following two undertakings on open spaces from the council in policy EN9. We would want to see a policy point to this effect in policies WR3a, WR3b and CR11f.	Agreed re Cox and Wyman. Change proposed. The policy should recognise the need to provide on-site open space in line with policy EN9.
Bell Tower Community Association	WR3a: Former Cox and Wyman Site, Cardiff Road WR3b: 2 Ross Road & part of Meadow Road	Since sites WR3a and 3b are both earmarked for development we would like to see the current provisional plan for access to Cox & Wyman site via a new access road from Addison Road changed to access to both sites from Meadow Road if this can be achieved while closing Meadow Road to through traffic. We would expect a temporary closure to vehicles at the Addison Road end of Meadow Road during demolition and construction at the sites to keep heavy vehicle traffic away from the residential area as outlined in section 4.1.39 of the local plan and once construction is completed a permanent closure at the Milford Road end to separate residential from industrial use and integrate the new housing developments with the existing residential area.	No change proposed. The specifics of road closures and access routes will need to be considered on the basis of more specific transport evidence at application stage.
Bell Tower Community Association	WR3a: Former Cox and Wyman Site, Cardiff Road	The biggest source of noise and pollution at night in the area is the Reading Train Care Depot off Cardiff Road. The council has said it is satisfied the depot is a cause of statutory nuisance, which would have to be a substantial factor to be taken into consideration in any planning application for the Cox & Wyman site. The existing nuisance should be dealt with immediately not only to protect existing and residents' amenity but also to enable/protect future residential development. To address this, we would like to see reference made to EN15 (ii) air quality within WR3a.	No change proposed. Policy WR3a already highlights the need to resolve noise and air quality issues. Dealing with existing statutory nuisance is not a matter for the Local Plan.
Bell Tower Community Association	WR3a: Former Cox and Wyman Site, Cardiff Road	We welcome the council's assertion that the development should avoid adverse effects on important trees including those protected by tree protection orders along Addison Road, address air quality and noise impacts on residential use. As far as heritage goes we would like to see any development on the site retain the eastern facade, as much of the look of the original brickwork as possible, retain the eastern boundary wall along Addison Road and reflect the fact that it used to be home to the oldest printers in England. Policy WR3a should include reference to historic context in line with policy EN6.	Partly agreed. Change proposed. There is not considered to be a justification for requiring retention of the eastern façade, which would significantly restrict development of the site. However, it is considered that the policy should acknowledge the patterned brickwork of surrounding streets, and require that development complements this.
Bell Tower Community Association	WR3a: Former Cox and Wyman Site, Cardiff Road	The development WR3a should also include maintaining and possibly increasing parking spaces on Cardiff and Addison Roads due to the removal of loading bays and lorry entrances.	No change proposed. The allocation clarifies that parking needs of the development should be met within the

			site. The operation of the highway around the development will be a matter for the Council to consider separately.
Thames Properties Ltd	WR3a: Former Cox and Wyman Site, Cardiff Road	The building is now unsuitable in terms of its layout and design for most modern industrial operations. Cox and Wyman vacated the building in April 2015 and it has since been let on an almost nil rent basis (10 pence/sq.ft), however there has been no significant interest to occupy the unit long term on normal market terms. Thames Properties is therefore supportive of Policy WR3a to remove the former Cox and Wyman site from the Richfield Avenue CEA and redevelop for residential use.	Noted. No change needed.
Thames Properties Ltd	WR3a: Former Cox and Wyman Site, Cardiff Road WR3b: 2 Ross Road & part of Meadow Road WR3c: 28-30 Richfield Avenue	The proposed release of the eastern edge of the Richfield CEA for redevelopment away from employment use suggests that RBC recognises that the pure CEA designation for Richfield Avenue is outdated and that more flexibility should be introduced to allow for a range of uses in this location. Thames Properties is supportive of this approach.	No change needed. This does not mean that the Council views the designation of other parts of the CEA as outdated, and this is made clear within the plan.
Thames Properties Ltd	WR3a: Former Cox and Wyman Site, Cardiff Road	<p>Policy WR3a states that the site will comprise 'Development for residential, with potential for commercial uses on the western edge of the site'. This implies that RBC's priority for the site is redevelopment for residential use, but the 'potential' for commercial use suggests that this will not be required by policy but would be considered by RBC if demonstrated to be appropriate.</p> <p>Through careful masterplanning, the redevelopment of the site presents an excellent opportunity to create a clear demarcation between employment uses within the CEA to the west of the site, and dwellings on Addison Road to the east, and consequently improve the relationship between these two uses in line with RBC's Spatial Strategy. The site itself is bound on all sides by existing roads which create a physical separation to surrounding uses, and scope exists to design a sufficient landscape buffer along the western and northern edges to ensure appropriate separation between the site and adjacent industrial uses.</p> <p>The site is well suited to a solely residential scheme comprising a mixture of houses and apartments and carefully designed landscaping and open space. It is not considered that the inclusion of commercial uses on the western edge of the site will enhance the overall scheme or assist in improving the transition between residential uses and the adjacent CEA to benefit future residents, and no explanation is provided in the Draft LP to justify why this is included within the policy wording. On that basis, we suggest that the policy wording is revised to require the site to be developed for residential use only.</p>	Noted. No change proposed. The allocation does recognise the potential for commercial uses on the western fringe of the site, but it is not worded as requirement. Inclusion of commercial uses can offer an opportunity to completely control the transition from residential to commercial within the site itself, but equally it is recognised that it is not a requirement.
Thames	WR3a: Former Cox	The Plan envisages that the site could be delivered within the short-medium term of the RBC	Noted. No change needed.

Properties Ltd	and Wyman Site, Cardiff Road	Local Plan period, i.e. 2016-2026. Thames Properties is supportive of this approach.	
Thames Water	WR3a: Former Cox and Wyman Site, Cardiff Road	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Agreed. Change proposed. The need to liaise with Thames Water on water infrastructure should be added.
Thames Water	WR3a: Former Cox and Wyman Site, Cardiff Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Thames Water	WR3a: Former Cox and Wyman Site, Cardiff Road	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Bell Tower Community Association	WR3b: 2 Ross Road & part of Meadow Road	On site WR3b, we are concerned by the fact that while there is the requirement to include all parking requirements within the site to avoid exacerbating parking issues on existing streets on WR3a this is not a requirement for WR3b. A recent survey by Bell Tower showed that residents considered the lack of parking spaces as one of the major downsides to living in the area and we would therefore seek the same requirement in respect of parking for all new developments.	Agreed. Change proposed. This should be added to the policy criteria.
Thames Water	WR3b: 2 Ross Road & part of Meadow Road	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Agreed. Change proposed. The need to liaise with Thames Water on water infrastructure should be added.
Thames Water	WR3b: 2 Ross Road & part of Meadow Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Thames Water	WR3b: 2 Ross Road & part of Meadow Road	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	WR3c: 28-30 Richfield Avenue	We welcome the requirement 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 the NPPF.	Noted. No change needed.
Thames Water	WR3c: 28-30	The water network capacity in this area may be unable to support the demand anticipated from	Agreed. Change proposed. The need

	Richfield Avenue	this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	to liaise with Thames Water on water infrastructure should be added.
Thames Water	WR3c: 28-30 Richfield Avenue	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Thames Water	WR3c: 28-30 Richfield Avenue	There are Thames Water assets on this site.	Noted. Change proposed. The existence of these assets should be noted.
Thames Water	WR3c: 28-30 Richfield Avenue	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Sport England	WR3d: Rivermead Leisure Centre, Richfield Avenue	Sport England supports the Council's intention to improve the sports facilities at Rivermead.	Noted. No change proposed.
Historic England	WR3e: Yeomanry House, Castle Hill	We welcome the requirement 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 the NPPF	Noted. No change proposed.
Thames Water	WR3e: Yeomanry House, Castle Hill	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3e: Yeomanry House, Castle Hill	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3e: Yeomanry House, Castle Hill	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change proposed.
Thames Water	WR3f: 4 Berkeley Avenue	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3f: 4 Berkeley Avenue	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3f: 4 Berkeley Avenue	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading	Noted. No change proposed.

		development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	
Historic England	WR3g: 211-221 Oxford Road, 10 and rear of 8 Prospect Street	We welcome the requirement 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 the NPPF.	Noted. No change proposed.
Thames Water	WR3g: 211-221 Oxford Road, 10 and rear of 8 Prospect Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3g: 211-221 Oxford Road, 10 and rear of 8 Prospect Street	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3g: 211-221 Oxford Road, 10 and rear of 8 Prospect Street	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change proposed.
Thames Water	WR3h: Rear of 303-315 Oxford Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3h: Rear of 303-315 Oxford Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3h: Rear of 303-315 Oxford Road	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change proposed.
Bellway Homes Ltd	WR3i: Part of Former Battle Hospital, Portman Road	The higher indicative site yield indicated in the policy of 160-240 dwellings at a density of between approximately 58dph-87dph, when compared to policy SA8f of the adopted SDPD, is supported. This recognises the urban character of the site and its surroundings and its good accessibility by a range of transport modes.	Noted. No change proposed.
Bellway Homes Ltd	WR3i: Part of Former Battle Hospital, Portman Road	This site specific policy offers the opportunity to be more specific in relation to the type and area of open space expected. The requirements of the policy should recognise the close proximity of the site to Battle Square open space and play area which is suitably located to serve the play needs of any future residential occupiers of the site.	Partially agreed. Change proposed. The policy should refer to the need for on-site open space provision that complements Battle Square. However,

			whilst Battle Square is a higher-order park, there will still need to be appropriate provision on this site, including play facilities, in line with policy.
Bellway Homes Ltd	WR3i: Part of Former Battle Hospital, Portman Road	Paragraph 7.3.16 of the draft Local Plan indicates that in considering site WR3i, the Battle Hospital Planning Brief will be continue to be relevant. This document was adopted in 2005 and is now over a decade old in its 'revised' form. I would maintain that the Planning Brief is of diminishing relevance. Due to its datedness policy requirements referenced in the Brief have been superseded, while large parts of the wider Battle Hospital site having now been developed. As a result reference to the Brief in this paragraph is considered unhelpful and should be omitted, or the Planning Brief updated to reflect up to date policy requirements and the desire expressed under WR3i to secure a higher density development of the site unlikely to be predominantly made up of houses.	Partially agreed. Change proposed. The Planning Brief is adopted SPD, and continues to provide useful guidance. However, it should be recognised that the plan is considerably more up to date, and would take precedence in the event of a conflict.
Historic England	WR3i: Part of Former Battle Hospital, Portman Road	We welcome the requirement 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 the NPPF.	Noted. No change proposed.
Thames Water	WR3i: Part of Former Battle Hospital, Portman Road	The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build	Agreed. Change proposed. The need to liaise with Thames Water on water infrastructure should be added.
Thames Water	WR3i: Part of Former Battle Hospital, Portman Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3j: Land at Moulsoford Mews	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3j: Land at Moulsoford Mews	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3k: 784-794 Oxford Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3k: 784-794 Oxford Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3l: 816 Oxford	On the information available to date we do not envisage infrastructure concerns regarding Water	Noted. No change proposed.

	Road	Supply capability in relation to this site.	
Thames Water	WR3l: 816 Oxford Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3m: 103 Dee Road	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Agreed. Change proposed. The need to liaise with Thames Water on water infrastructure should be added.
Thames Water	WR3m: 103 Dee Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3m: 103 Dee Road	There are public sewer crossing this site.	Change proposed. Paragraph 7.3.17 should be amended to reflect this.
Thames Water	WR3n: Amethyst Lane	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Agreed. Change proposed. The need to liaise with Thames Water on water infrastructure should be added.
Thames Water	WR3n: Amethyst Lane	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3o: The Meadway Centre	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3o: The Meadway Centre	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Historic England	WR3p: Alice Burrows Home, Dwyer Road	We welcome the requirement 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 the NPPF.	Noted. No change proposed.
Thames Water	WR3p: Alice Burrows Home, Dwyer Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3p: Alice Burrows Home, Dwyer Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3p: Alice Burrows Home, Dwyer Road	There are public sewers crossing this site.	Change proposed. Paragraph 7.3.17 should be amended to reflect this.
Environment Agency	WR3q: Norcot Community Centre, Lyndhurst Road	This site should have the bullet point "Address any contamination on site" added.	No change proposed. The Council is not aware of any identified potential for contamination. As such it is not a specific constraint identified for this

			site, and would be dealt with on a case by case basis in line with the pollution policy.
Historic England	WR3q: Norcot Community Centre, Lyndhurst Road	We welcome the requirement 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 the NPPF	Noted. No change proposed.
Thames Water	WR3q: Norcot Community Centre, Lyndhurst Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3q: Norcot Community Centre, Lyndhurst Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3r: Charters Car Sales, Oxford Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	WR3r: Charters Car Sales, Oxford Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Jenny Cottee	WR3s: Land at Kentwood Hill	<p>I am pleased to note that the proposal for development of this area of land is treated in context of proposals for all the land owned by the Tilehurst Poor's Land Charity so that piecemeal development is prevented.</p> <p>I am pleased that the Whithies will be protected, and agree that much needed housing should be permitted on the lower, Northern section of the site. Indeed I believe this lower area of the hillside could well accommodate three storey dwellings. I am, however, concerned about the effect of the development proposal extending to the builders' yard and the southern extremity of the site i.e. the brow of the hill. Building on these southern areas of the site should only be permitted if it is not detrimental to the views to and from the Chilterns.</p> <p>I believe that the view from the Recreation Ground, Armour Rd and the top of Kentwood Hill provides daily uplift to the spirits of many. These views can be enjoyed whilst on the daily routine of walking to the shops, riding on a bus to work etc. People do not have to make a special effort to go to a viewing point in a Park to receive this daily benefit and boost to mental health. The view is part of the heritage of Tilehurst residents and all who visit. It must be preserved.</p> <p>I believe there are several ways of designing in the protection of the view I advocate. The treatment of the southern area of the site could be one or more of the following:</p> <ol style="list-style-type: none"> 1. Keep the see-through fencing and enlarge the Recreation Ground to accommodate the needs of the increased population. The Recreation Ground is too small at the moment and sorely needs improved facilities. 	Change proposed. The policy should recognise the importance of ensuring that views through the site towards the Chilterns can be gained from the recreation ground and nearby streets.

		<p>2. Provide other POS or amenity area having see-through fencing as the recreation ground has currently.</p> <p>3. Locate residents' visitors' and recreation ground car park space next to the recreation ground boundary.</p> <p>4. Allocate some of the area for single-storey buildings only- possibly employment use as currently i.e. small modestly priced units for rent suitable for small businesses /start-ups. This would avoid the loss of such (all be it unregulated) employment land as discussed in EM3</p> <p>The Draft plan already offers some protection of the view. Policy EN10 requires some POS (assuming that the number of dwellings exceeds 50) and policy EN5 refers to significant views with heritage interest. However, I wish protection in this plan to be more far more explicit and suggest strengthening bullet point seven. The alternatives would be for the developer to determine within the requirement of a revised version of the bullet point.</p> <p>I request that bullet point seven be altered to say</p> <ul style="list-style-type: none"> • "Avoid adverse visual impacts on the West Reading Wooded Ridgeline major landscape feature and the views of the Chilterns from the recreation ground and neighbouring thoroughfares." 	
Liz Ellis	WR3s: Land at Kentwood Hill WR3t: Land at Armour Hill	<p>The current local plan also mentioned that areas of open space where development is permitted should retain aspects of their nature so that the development is not detrimental to the area, this included invasion of skylines, views etc. Since the area is on a hillside that affords welcome sights for the existing population, one would hope that these aspects of the site would be retained. In particular there is a permanent stream that runs through the area known as the Withies. Permanent streams are a feature of Tilehurst; there are a number of these streams which determine and encourage and support the nature and wildlife of Tilehurst. The stream that runs down through the Withies, and the Withies themselves should be retained as an important area especially as it is an area of encouragement to the local wildlife and to the local trees and vegetation. Some of the permanent streams in Tilehurst have been put underground into ducts of some sort or other (eg down Chapel Hill). This must not be allowed to happen here.</p>	Agreed. Change proposed. The policy should recognise the need to avoid adverse effects on the stream.
David Griffiths	WR3s: Land at Kentwood Hill	<p>This used to be allotment land. The tenants were evicted 25 years ago and the owners have consistently refused to let the land as allotments ever since. There has been a great deal of salami slicing expansion of a builders yard. The flat part of this land adjacent to the recreation ground should be reserved for an expansion of the recreation ground. The rec is heavily used and needs to be bigger to support an increasing population. Not putting houses on this land will also help preserve the views both to and from the Kentwood escarpment.</p>	No change proposed. There is a very significant need for new housing, and therefore sites should be allocated where appropriate. The report of the Inspector on the SDPD highlights the need for a comprehensive approach to this site. A change is proposed to recognise the views of the Chiltern escarpment.
Historic England	WR3s: Land at Kentwood Hill	<p>We welcome the requirement for development take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear</p>	Noted. No change needed.

		strategy for enhancing, the historic environment as required by the NPPF.	
William and Joan Macphee	WR3s: Land at Kentwood Hill	<p>We object to building on this land. It used to be allotments, and in the future should be returned to this use, as demand for allotments increases. I understand that there are currently about 6 allotments vacant and about 20 names on the waiting list.</p> <p>Further, building on this site would likely present a considerable increase in congestion and pollution, and would interfere with the view from Tilehurst over the Thames towards Oxfordshire.</p>	<p>No change proposed. There is a very significant need for new housing, and therefore sites should be allocated where appropriate. The report of the Inspector on the SDPD highlights the need for a comprehensive approach to this site. There is little prospect of allotments on the site being reinstated, and no powers for the Council to require this. A change is proposed to recognise the views of the Chiltern escarpment.</p>
Natural England	WR3s: Land at Kentwood Hill	<p>Residential development on wild greenspace. Is there no alternative to this site? There is so little wild green space left in Reading. This site will be hard to provide a biodiversity net gain with landscaping the only option will be to retain and enhance the most ecologically diverse bits.</p> <p>Add dot points “• Avoid any detrimental impacts upon biodiversity, and provide for biodiversity net gain wherever possible; • Retain green links as vegetation buffers with a preference for retaining the most mature, wild green space areas with minimal pedestrian access via designated paths only.”</p> <p><i>NB: This comment originally refers to WR3r but it is assumed that it is intended for WR3s</i></p>	<p>Partly agreed. Change proposed.</p> <p>There is a very significant need for new housing, and therefore sites should be allocated where appropriate. The report of the Inspector on the SDPD highlights the need for a comprehensive approach to this site. The area identified for development avoids the wildest areas (the copse) for its biodiversity benefits, and ensures the retention of green links. The biodiversity criterion is already in the policy.</p> <p>Within the context of the allocation, which already avoids the wildest areas, it is considered that the reference to green links cannot go as far as suggested, but should emphasise the need for these to be well vegetated.</p>
Thames Water	WR3s: Land at Kentwood Hill	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what</p>	<p>Noted. No change needed. The need to consider water infrastructure is already considered within the policy.</p>

		infrastructure is required, where, when and how it will be delivered	
Thames Water	WR3s: Land at Kentwood Hill	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Tilehurst Poor's land Charity	WR3s: Land at Kentwood Hill WR3t: Land at Armour Hill	<p>The site is located in a residential area, less than 130 metres from the local centre (the Tilehurst Triangle) which provides a wide range of local services and amenities. It is well served by public transport and in close proximity to a number of facilities including schools and GP surgeries. Given the site's location and proximity to services, as expanded upon below, it forms a highly sustainable location which is capable of providing much needed additional housing (including family housing) in Reading.</p> <p>The previously developed area of the site (the builder's yard) has previously been the subject of considerable discussion and analysis during the preparation of the SDPD where it was initially identified for residential development for 11-17 dwellings. However, the allocation was excluded from the SDPD. The Inspector's key consideration in resisting the allocation is that it represented piecemeal development and should instead have been considered holistically with the surrounding parcels of land (namely the recreation ground, allotments and scrubland/tree area). He did not question the overall suitability of this location for residential development - indeed the proposed allocations within the emerging Local Plan deliver the "comprehensive approach" sought by the earlier Local Plan Inspector.</p> <p>The site has also been identified in the recent HELAA as site KE008. The HELAA identifies that the site is available and potentially suitable for residential development with the allotment retained and residential development on the land at Kentwood Hill and Armour Hill. In the context of RBC not meeting its full housing need it is crucial that the proposed allocated sites are developed to their full potential (having regard to development management considerations) to ensure that the emerging Plan seeks the highest achievable level of housing delivery. The emerging Local Plan also seeks to address residential density (draft Policy H2). This identifies an indicative range of 30 - 60 dwellings per hectare (figure 4.5) and a need "in particular for family homes of 3 or more bedrooms". Our clients have prepared two indicative masterplans identifying alternative development routes. These masterplans show an indicative density of between 29-32 dwellings per hectare with a focus on larger family housing.</p> <p>Our clients support the allocation of the sites at Kentwood Hill and Armour Hill at the higher end of the proposed identified capacities (which are 62 and 18 respectively). This form and level of development both respects the sites context and surroundings and assists in contributing to the "pressing need" for additional residential development within Reading.</p> <p>Technical work has been prepared supporting the suitability of the site:</p> <ul style="list-style-type: none"> An initial Site Access Appraisal 	Noted. No change needed.

		<ul style="list-style-type: none"> Indicative Masterplans An initial Landscape and Visual Assessment An initial desk-based Ecological Appraisal 	
David and Susan Bailey	WR3t: Land at Armour Hill	We have an allotment here and routinely use and require the Armour Hill entrance, both by car and on foot. Any change through planning, which may affect this, I strongly oppose. Whilst I understand the need for extra housing etc. I think enough is enough, we need to preserve the green land that is left to us.	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.
Ivan Baker	WR3t: Land at Armour Hill	This proposed site will require an environment impact assessment. It is known there is a badger set in what is currently a virtual jungle. Many years ago there was a watercress bed towards the bottom end of Armour Hill fed by a local stream. When this became defunct and overgrown it became inhabited by newts, (protected) frogs and toads. As it is almost impossible to access now it is not known if this still applies, but what is known there is the highest concentration of slowworms probably in Berkshire.	No change proposed. The policy ensures that biodiversity is taken into account in any proposals. The area of greatest wildlife significance is not proposed for development.
Ivan Baker	WR3t: Land at Armour Hill	The possible loss of the allotment car park is a concern. As a plot holder, and living in Oxford Road it is impracticable to walk this distance with tools, compost and plants. I also have my manure delivered to this site every two years. The loss of this car park will mean parking on the brow of Armour Hill (dangerous) or Larissa Close, and this could cause problems with the residents there.	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.
Mary Bartlett	WR3t: Land at Armour Hill	<p>I was dismayed when I found out there is a possibility that some of the land currently part of the allotment site could be used as part of the development land. There are lots of reasons why this should not go ahead:</p> <ul style="list-style-type: none"> Green Space is disappearing at an alarming rate, and an allotment is a good example of keeping healthy The impact will be on the car park and the track which leads off the parking area. I need to be able to drive to the allotment with tools and take my crops home If it was absorbed into a housing development I fear some allotment land would have to be taken out of use to make a new track. This would be totally unacceptable. The access to the site needs to be able to accommodate a car and have a lockable gate. Access is also required for deliveries to the site, manure and wood chippings, and after Christmas the car park is a hive of activity when Christmas trees are shredded. Lots of allotment holders use the water supply that is in the car park. 	<p>Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.</p> <p>The proposal does not involve the loss of any existing allotments.</p>
Richard and Linda Beakhouse	WR3t: Land at Armour Hill	I understand Reading Council might agree to land needed by the allotments being used for housing. The land in question includes the car park and track giving access to the plots at the lower end of the site of which one is ours. The road around the Armour Hill entrance are already very congested with parked cars. The track enables us and others with plots at this end of the site to both bring bulky items and arrange for deliveries of essential materials to our plots. Without them some land would have to be taken out of use as allotments to make a new car park and access track. I do not agree to any of the allotment site land being taken for housing. Please ensure that this cannot happen.	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.

Leslie Burrow	WR3t: Land at Armour Hill	<p>I am highly concerned at the potential detrimental effect of the draft proposals as they relate to the existing car parking facilities and service road off Armour Hill, due to my mobility requirement to travel to the site by car and therefore have onsite parking facilities, practicality in obtaining water supply near to my plot, delivery of manure, and site security necessitating a lockable gate for the sole use of plot holders</p> <p>I would like reassurance that the above mentioned existing car parking facilities and the service road will be protected and not be adversely affected by the proposed development.</p>	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.
Jenny Cottee	WR3t: Land at Armour Hill	<p>I support the proposal of Tilehurst Allotments Society that the allotment car-park and track should be protected. To do this I explain why I need to use the car park and my personal pattern of use at present.</p> <p>I have allotment plots in the middle of the site off Armour Hill /Polsted Rd. I visit the site during the winter months on average three times a fortnight. In the spring -autumn months I visit more frequently. Sometimes I travel on foot using the Polsted Rd. entrance -other times I go by car using the car park. During the week the car park has about 3 vehicles in it when I am there. At weekends and summer evenings the carpark is much more crowded so frequently I park in Larissa Close or Armour Hill. I go by car if I have big or heavy things to transport e.g. some tools, cardboard to go on the compost heaps, equipment like bean poles, bulky crops (e.g apples onions potatoes flowers). Sometimes I travel to or from the allotment en route somewhere else-perhaps to deliver crops to family- again on these occasions I will use the lower entrance the carpark and track. If anything, the car-park is too small and should be enlarged. I do not drive along the track but I walk along it to reach plots on the South and East parts of the site. If the track were included in an external development many plots would have to be sliced through to make a new track ensuring access across the site, a disgraceful possibility.</p> <p>I was dismayed in 2001 when I saw the Wimpey plans to build off Armour Hill and saw the proposal to remove the allotment carpark and track. I knew it would be convenient for the developer, but would have extremely serious consequences for the allotments site. Many plots would have been directly affected and the proposed arrangements seemed unworkable.</p> <p>I want to protect the car park and track from disturbance -they are integral to the efficient functioning of the allotment site. Clearly the layout of the roads and the gradients involved mean that there would be financial advantage to a developer to take the carpark and the track. This means that the plan must be unambiguous in its protection of the functionality of the allotment site and all its plots.</p>	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.
Deborah Dadd	WR3t: Land at Armour Hill	I am particularly concerned that the car park and track to my allotment appear to be included within the development area. Not only would this mean losing my vehicular and potential foot access to the allotment that allows me to transport large items and get manure delivered but it	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the

		<p>would significantly increase the parking issue on Armour Hill which quite often already reduces traffic to one lane and gets exasperated when events are held at the scout hall at the bottom of the road.</p> <p>I also do not wish the outlook from my house to be altered with four of my main rooms looking on to the allotments currently</p> <p>Finally I am concerned about the loss of wildlife habitat for both the Armour Hill and Kentwood Hill proposed development areas. This area currently provides habitat for a great variety of animals including badgers, kites and slowworms which I believe are all protected species.</p>	<p>allotments.</p> <p>The policy ensures that biodiversity is taken into account in any proposals. The area of greatest wildlife significance is not proposed for development.</p>
Liz Ellis	WR3t: Land at Armour Hill	<p>The current plan indicates the number of new dwellings on the Armour Hill allotments land would be in the order of 10 to 12. If dwellings are to be on this land then the number of houses should be more than this. The top end of Armour Hill between the car park gates and Lower Armour Road have many more terraced houses - somewhat in the region of 20. So why can't there be at least that many in the area between the car park and the bottom of the Armour Hill allotment land. We do not need more large detached houses in Tilehurst, we need houses that people can afford to live in and that are compatible with the type of houses that are already in the area. It would be good if some sort of pressure could be put on the developers to build what is needed and not what will make them most money.</p>	<p>No change proposed. The dwelling totals have been calculated using a consistent approach, and the Plan accepts that the final total may be outside the range specified where it can be justified. The range proposed is not based on large detached houses.</p>
Liz Ellis	WR3t: Land at Armour Hill	<p>It is suggested in the plan that the land that is currently used as allotments, should be retained for that purpose. It would be reasonable that the area on Armour Hill that is currently used as a car park together with the path that runs from the car park to the allotments along the bottom edge of the site should also be retained for use by the allotment holders since these are within the fenced off area of land which is understood to be for allotments.</p>	<p>Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.</p>
Mr G Goodall	WR3t: Land at Armour Hill	<p>I understand Reading Council might agree to land needed by the allotments being used for housing. Please will you alter the Draft Local Plan to make sure this cannot happen. I do not agree to any of the allotment site land being taken for housing. We need the car park and track. Without them some land would have to be taken out of use as allotments to make a new car park and access track.</p> <p>I personally need the car park and track for easy access to enable me to take heavy tools that I don't leave on my plot.</p> <p>Armour Hill is already an over parked area, so more cars having to park away from their allotments is going to either push people away from what I consider to be a very worthwhile form of exercise and meeting new people from the local community, or cause possible issues with the local residents because of the increased "off allotment" parking.</p>	<p>Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.</p>
David Griffiths	WR3t: Land at Armour Hill	<p>The area for development includes the allotment entrance, carpark and an allotment access track. Incorporating these will significantly impact the remaining allotments.</p> <ul style="list-style-type: none"> • The carpark is already too small (half a dozen car spaces) to serve the 130 or so tenants of the 	<p>Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the</p>

		<p>allotments. We need occasional vehicle access to transport supplies, produce and tools. Some plotholders have mobility problems.</p> <ul style="list-style-type: none"> • Bulk allotment supplies like wood chips and manure are delivered via the carpark and track. • The track is used as additional parking. • If the track is absorbed into a development, some allotment land must be sacrificed simply to provide access to the plots. • The water supply to the allotments is via dipping tanks and taps in the carpark and along the track. Alternative facilities will again be at the expense of lost allotment land. • In the absence of a detailed plan, it is not clear how the allotments will be accessed from Armour Hill. A shared entrance with the development would have implications for site security. 	allotments.
Historic England	WR3t: Land at Armour Hill	We welcome the requirement 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 the NPPF.	Noted. No change needed.
Nick Hunter	WR3t: Land at Armour Hill	This seems to also include land currently used as part of the existing allotments, including the car park. I would like to object to the proposal. This car park is essential for accessing the allotments with any plants or equipment, and for delivering manure. The site is quite steep with narrow paths, and it would not be practical to approach lower allotments from the other side.	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.
William and Joan Macphee	WR3t: Land at Armour Hill	<p>We note that the proposed building site includes a strip of land currently included in the allotment site, and used in connection with the allotments. We wish to object most strongly to the loss of this strip of land from the allotments. It currently provides vehicle access to the site, car parking space, a water point, and a vehicle track along the S and W of the allotments.</p> <p>Vehicle access and parking are definitely necessary - some allotment holders live too far to walk or cycle, and public transport is sparse. In addition, vehicles are sometimes needed to bring tools, plants etc to the site, to remove produce; and occasional deliveries of manure are made along the track.</p> <p>Apart from the above, we have no objection in principle to such building, apart from the usual considerations of increased traffic congestion and loss of green space - but better to build there if one has to, than on open country or agricultural land.</p>	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.
Natural England	WR3t: Land at Armour Hill	<p>Residential development on wild greenspace. Is there no alternative to this site? There is so little wild green space left in Reading. This site will be hard to provide a biodiversity net gain with landscaping the only option will be to retain and enhance the most ecologically diverse bits.</p> <p>Add dot points</p> <ul style="list-style-type: none"> • Avoid detrimental impacts on the wildlife value of adjoining wooded areas • Retain green links as vegetation buffers with a preference for retaining the most mature, wild green space areas with minimal pedestrian access via designated paths only." 	There is a very significant need for new housing, and therefore sites should be allocated where appropriate. The report of the Inspector on the SDPD highlights the need for a comprehensive approach to this site. The area identified for development avoids the wildest areas

		<i>NB: This comment originally refers to WR3s but it is assumed that it is intended for WR3t</i>	(the copse) for its biodiversity benefits, and ensures the retention of green links. The biodiversity criterion is already in the policy. Re green links, the site is small, and surrounded by green space (taking account of the landscaped buffer to Armour Hill) in any case.
David Newnham	WR3t: Land at Armour Hill	I understand Reading Council might agree to land needed by the allotments being used for housing. Please will you alter the Draft Local Plan to make sure this cannot happen. I do not agree to any of the allotment site land being taken for housing. We need the car park and track. Without them some land would have to be taken out of use as allotments to make a new car park and access track. It is also worth considering the impact on the wildlife. There are badgers, deer, slow worms and also Stag beetles that live and breed on this area of the site.	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments. The policy ensures that biodiversity is taken into account in any proposals. The area of greatest wildlife significance is not proposed for development.
Jennie Newnham	WR3t: Land at Armour Hill	I understand Reading Council might agree to land needed by the allotments being used for housing. Please will you alter the Draft Local Plan to make sure this cannot happen. I do not agree to any of the allotment site land being taken for housing. We need the car park and track. Without them some land would have to be taken out of use as allotments to make a new car park and access track.	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.
Margaretta Watkins			
Ken Phillips	WR3t: Land at Armour Hill	My plot is accessed from Armour Hill. I do not agree that any allotment land should be used for housing. I am also concerned that the Armour Hill car park and the track leading to plots AB10-AB22 is retained.	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.
Polsted Road Residents Committee	WR3t: Land at Armour Hill	We would like to pass on our total rejection of current planning proposals of 12-18 dwellings, including the carpark and lower track of the allotment site, beside us. For decades, occasional plot holders from the allotment have accessed this site, via Polsted Road. These proposals would therefore suggest further traffic along our officially recognised Private Road. At this time, the Polsted Road Residents Committee is engaged in a road surface maintenance plan, being entirely funded by all private residents of Polsted Road. This is due to commence in July next month. With our Private Road status, it is our agreed responsibility to maintain for the benefit of all those residing in Polsted Road, and those requiring access - only the Council dust carts, emergency services, community services (Readibus), and for those making temporary visits.	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments. As a result, there should not be any increase in traffic along Polsted Road. Proposals will be expected to mitigate their effects on local infrastructure, in line with other policies in the plan.

		To add, significantly this site, and the neighbouring Victoria Recreation Ground, are of great environmental value to the whole community, and benefits a great number. To develop this surely adds to the pressure on local schools, health care community, and highways already under increasing strain. We therefore urge you to consider all local concerns and look forward to hearing from you - we can be contacted on either of our email addresses below.	
Carolyn Ribbons	WR3t: Land at Armour Hill	<p>I am writing to ask you to reject a proposal to include allotment land at Armour Hill/Polsted Rd for housing. This land is needed, not only by Allotment holders, but also as open space for residents to enjoy. Whilst I understand the need for land for housing, I do not agree to the use of allotment land.</p> <p>We need the car park and track, especially as parking is very restricted in Armour Hill, due to the narrow road, and residents park at present, right across the pavement(on allotment side) already. The rest of Armour Hill is a nightmare to park! Polsted Road is prohibited for parking as it is a private Road. In addition, our main water supply for the allotments come via the car park, and we also use it for deliveries for manure, compost etc, and unloading for supplies. Reading Council also use it to offload shredded Christmas Tree bark every year.</p>	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments. No part of the allotments itself is proposed for development.
Colin and Christine Robinson	WR3t: Land at Armour Hill	<p>It is unclear from the plan just how far the current allotments will be protected in any future development. In particular it appears that it might be possible for a developer to include the current access gate, opposite Larissa Close, the car park beside the water trough and the track from the gate to the allotments at the far end of the site.</p> <p>We rent an allotment (AA20) which is right at the end of that track. It is the only way it can be accessed by car. For any deliveries of manure or heavy equipment, we are reliant on that access. Even for normal, everyday use, we need to drive to the allotment as we always carry materials and equipment back and forth and, of course, the produce we harvest. Without the car park and the track, our allotment would become exceedingly difficult to manage.</p> <p>The current carparking space is only barely adequate for the increased number of allotment holders - most allotments are now half-plots, thus doubling the number of allotment holders. Cars that cannot park in that car park currently park on the narrow roadway of Armour Hill, frequently encroaching onto the pavements, or in Larissa Close, to the obvious annoyance of residents.</p> <p>It must be made clear, in the plan, that the CURRENT car park and track are to be protected.</p>	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.
Phil Smith	WR3t: Land at Armour Hill	<p>Access to the allotments on Armour Hill is vital, a future planning application that could include this land, which will leave the allotments without a carpark, and no track access to the 15 plots currently on the lower track</p> <p>I regularly use the carpark and the lower track as well as getting water from the Armour hill</p>	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.

		supply.	
Thames Water	WR3t: Land at Armour Hill	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change needed.
Thames Water	WR3t: Land at Armour Hill	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Tilehurst Allotments Society	WR3t: Land at Armour Hill	<p>We refer below to the 2001 application for 7 dwellings on this site, withdrawn just before consideration by Planning Applications Committee, to illustrate practical problems that could arise in a future application. This would have involved the allotment site in the loss of:</p> <ul style="list-style-type: none"> • the only car park (6-8 spaces). This car park serves the whole allotment site and holds the stock of wood chippings used and replenished throughout the year. • direct track access to 13 plots so their tenants would not be able to ferry tools and produce or get manure delivered to their plots. Indeed it was not clear how plot-holders would get to their plots without the track. Some would have lost their personal car parking space on part of their plot. • a dipping tank and hose point servicing 13 plots, and the supply to 6 other taps (all located in the carpark). To protect the functionality of the allotment site all these water access points would have needed to be replaced without detriment. <p>If this scheme had been carried out it would probably have been necessary to construct a new internal track, for example by taking out of cultivation about a quarter of each of more than a dozen allotment plots.</p> <p>Now in 2017 more than 50% of the allotment plots are let as half plots. The need for parking space has increased and there is usually an overflow of cars parked on Armour hill /Larissa Close. The allotment site currently meets the RBC requirements of a Grade A site. The exclusive use of the existing carpark, track and security gate are integral parts of the allotments and should be protected.</p> <p>The Society believes the most reliable way of securing the protection of the existing allotments during the 20-year life of the Plan is to modify the boundary of Wr3t to exclude the entrance, carpark and the track. It would be for a developer to identify a new entrance to the modified site WR3t.</p> <p>Alternatively, if it is not acceptable to alter the boundary of WR3t the first bullet point should be modified to read</p> <ul style="list-style-type: none"> • "supported by information showing how the development fits within a comprehensive approach to the whole area (including WR3s, and the protection of the recreation ground and the neighbouring allotments their service areas and functionality)" 	<p>Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.</p> <p>With reference to the proposed change to bullet point 1, it is not clear how this adds anything to bullet point 2.</p>
Julia Waters	WR3t: Land at	I object to the proposal to develop a section of the Polsted Road/Armour Hill allotments.	The policy should seek to retain the

	Armour Hill	<p>Already, Polsted Road suffers - in terms of congestion, safety, degradation of road surface, parking - from traffic accessing the allotments. As a private, unadopted road, Polsted Road is maintained by the residents: the council, Tilehurst Poors' Lands Trust and the allotment committee have all refused to contribute to its upkeep. This situation would become far worse were the only car park on the allotments and access from Armour Road (which is maintained by the council) to be removed.</p> <p>There is currently a waiting list for allotments: rather than reduce access to this valuable local asset, the allotment trustees should be encouraged to release more land for allotments.</p> <p>I am concerned that local residents have not been made aware of the Local Plan, the outcome of which would impact enormously on their well-being and immediate environment.</p>	<p>same level of access and parking for the allotments. As a result, there should not be any increase in traffic along Polsted Road. There will be no loss of current allotments.</p> <p>The Council has sought to consult widely on the Local Plan, and the issues around the allotments have been publicised many times.</p>
Margaretta Watkins	WR3t: Land at Armour Hill	<p>We own an allotment plot at the site off Armour Hill /Polsted Rd. I understand Reading Council might agree to land needed by the allotments being used for housing and removing the car park that we use at the site. Please will you alter the Draft Local Plan to make sure this cannot happen as the carpark is a vital part of the infrastructure to accessing the site.</p> <p>I do not agree to any of the allotment site land being taken for housing. We need the car park and track. Without them some land would have to be taken out of use as allotments to make a new car park and access track.</p>	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.
Steve Watson	WR3t: Land at Armour Hill	<p>I understand Reading Council might agree to land needed by the allotments being used for housing. Please will you alter the Draft Local Plan to make sure this cannot happen. I do not agree to any of the allotment site land being taken for housing. I need the car park and track. The current proposals do not give sufficient protection to this valuable local amenity.</p>	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.
Catherine Wood	WR3t: Land at Armour Hill	<p>I fully understand the important and urgent need for housing, especially affordable housing in this area. I just hope this desperate need does not mean that decisions are made that divide the area and work against a treasured local asset.</p> <p>As an allotment plot holder, I use the car park when bringing heavier items to the plot, this is increasingly necessary in spring and summer whilst there are many works going on. I also feel that a designated car park stalls any local hostility in an area where parking is already becoming problematic.</p> <p>My plot is next to the bottom track, as such, my plot will be directly next to any development, if the track is part of the development, I feel that this will slowly erode the lower half of the allotment over time. It would be a valuable green space for any new residences, and could be easily enjoyed as a shared space. I also rely on the lower track to access water, whilst there are taps further up, every extra burden is likely to mean more plot holders no longer want to continue.</p>	Partly agreed. Change proposed. The policy should seek to retain the same level of access and parking for the allotments.

		There is a great opportunity to develop the area sympathetically (though I would suggest widening the lower part of armour hill, or making access through the current block of flats road). If these are developed with the support of the community, then any new inhabitants will be welcomed to the allotments and the wider community.	
Historic England	Paragraph 8.1.5	We welcome this paragraph.	Noted. No change needed.
Norma and Julian Ansell	8.2: Strategy for Caversham and Emmer Green	The plan states that around 700 homes can be accommodated in the area. Section 8.3 identifies between 164 and 241 homes and my question is how that figure was arrived at and where the additional homes are included in the plan. You did point out that homes identified in section 8.3.5 would be included although with the exception of the 40 dwellings in St Martin's Precinct these seem to be either nursing home beds or care apartments rather than homes in the traditional sense. We would also point out that, so far as we are aware, the proposal to develop St Martin's Precinct has been dropped following the withdrawal of backing from Waitrose.	The figures in the Draft Local Plan were broken down as follows: <ul style="list-style-type: none"> - Around 201 homes on Local Plan sites; - 58 homes completed 2013-16 - 110 homes on strategic sites with planning permission - The remainder as an allowance for small site completions of around 17 per annum (based on past rates of small site delivery in the area).
Norma and Julian Ansell	8.2: Strategy for Caversham and Emmer Green	South Oxfordshire have received a planning application from Gladman Developments in respect of the land off Peppard Road. Whilst it is appreciated that this land is outside of the Reading boundary it does adjoin the boundary and there is substantial open land to Sonning Common. Given the scale of the proposed development (245 dwellings) we would have expected to see some reference to it in the Reading plan.	No change proposed. The Gladman application has now been refused. The position in terms of outstanding applications is fluid and subject to change. The Local Plan does not generally refer to undetermined applications whether inside or outside the Borough.
Caversham and District Residents' Association	8.2: Strategy for Caversham and Emmer Green	<p>The Local Plan recognises that there is little scope for additional housing in Caversham, and therefore the proposal for 700 additional homes by 2036 is a cause for significant concern. We are concerned that there are no phasing proposals which would ensure that the provision of additional housing could be spread over the local plan period. After draft allocations and permissions, this would leave a target of between 290 and 375 dwellings to be located on infill sites or in residential gardens.</p> <p>As there are few infill sites these figures will inevitably act as an invitation for developers to target residential gardens. As individual schemes in residential gardens produce modest number of homes, the number developments which would be required to meet the target figures would be very considerable. Whilst sometimes successful, developments in residential gardens can gradually erode the character of areas. They also involve the loss of valuable green spaces and disrupt wildlife corridors. Cumulatively they can have the effect of changing the character of an area and we would expect policies which ensured that this does not occur.</p>	<p>No change proposed.</p> <p>700 homes over a 23 year period equates to an average of 30 homes per year in the area. Over the period 2005-2015, an average of 65 dwellings per year have been completed in the area, which indicates that there is actually expected to be a significant reduction. There is not therefore expected to be any increase in pressure on rear gardens, albeit that appropriate garden development that accords with relevant policies will still</p>

			take place.
Emmer Green Residents Association	8.2: Strategy for Caversham and Emmer Green	At the Planning Applications Committee in January 2017 reference was made to the adverse impact such a development (as Gladman's scheme at Peppard Road) would have on the local infrastructure, and an objection to the development was lodged. Whilst the possible housing numbers in the Local Plan are smaller in Emmer Green (but not in the whole area north of the Thames), the same potential problems will be created.	Noted. No change proposed. The overall level of development north of the river would actually be lower per annum than recent rates. There are infrastructure needs in terms of matters such as transport and education, but it is considered that these can be overcome.
University of Reading	8.2: Strategy for Caversham and Emmer Green	We maintain our support to the objective within paragraph 8.2.1 of the Draft Plan to provide an additional crossing of the River Thames, east of Reading. It is considered that a third Thames Bridge is critical to the future of Reading and must be considered as a fundamental requirement in terms of strategic infrastructure.	Noted. No change proposed.
Emmer Green Residents Association	Paragraph 8.2.1	Point b is viewed with some scepticism, because there is a perception that these infrastructure developments are not always delivered and that in any event they do not deal with the wider, cumulative, impacts of smaller incremental developments. For Emmer Green this includes the impact of through traffic generated by development in the South Oxfordshire area to the north.	Noted. No change proposed. However, the Council intends that the infrastructure set out in the IDP will support growth proposed.
Emmer Green Residents Association	Paragraph 8.2.1	Point c - it is stated that provision should be made for Park and Ride provision on the B481 coming into Reading from the north. This would be very helpful in reducing the car traffic coming through Emmer Green and using the Reading river bridges. There will be a price to be paid in terms of loss of open land. However, in the Transport Section (page 18) of the Infrastructure Delivery Plan this scheme is not listed among the Core items. This must give rise to some doubts about whether it will ever be given implementation priority.	No change proposed. Park and ride is listed generally, and the plan makes clear that this is one of the corridors on which provision is sought. However, as yet there is no proposed site which could be included as a freestanding IDP item.
Emmer Green Residents Association	Paragraph 8.2.1	Point d - reference is made to the possible third Thames crossing, but acknowledging that its realisation is in the hands of neighbouring Local Authorities. There are mixed views on this in Emmer Green. Given the length of time this has been under consideration there is little expectation of its delivery as a solution to the congestion in Caversham. However, if it is delivered the supporting road developments are likely to adversely affect Emmer Green - which would not be welcomed.	Noted. No change needed. This proposal is being progressed, involving consideration of any knock-on impacts.
Emmer Green Residents Association	Paragraph 8.2.1	Point e - the commitment to safeguard the southern boundary of the Chiltern Area of Outstanding Natural Beauty is welcomed.	Noted. No change proposed.
Environment Agency	Paragraph 8.2.1	Add an additional point to read: "g. The ecological value of the River Thames, Berry Brook, Christchurch Ditch and The Creek at the base of the escarpment at The Warren will be protected and enhanced."	Partly agreed. Change proposed. This should be covered in an expanded point f.
Environment Agency	Paragraph 8.2.2	Mention is made of the potential for development involving residential gardens. This seems to be at odds with paragraph 4.2.59 in support of policy EN12, which stresses the importance of "well vegetated gardens" as green links through the Borough.	No change proposed. This is not intended to create a blanket presumption against garden

			development, and each case must be considered on its merits.
Historic England	CA1a: Reading University Boat Club, Thames Promenade	We welcome the requirement 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 the NPPF, although we would like to see “which should inform the development” added to the end of the fourth bullet point.	Agreed. Change proposed. This text should be added.
Sport England	CA1a: Reading University Boat Club, Thames Promenade	Sport England objects to the loss of this sports facility in the plan and requests further information from the Council as it conflicts with paragraph 74 of the NPPF	Change proposed. The use of the site is dependent on the relocation of the boat club, and the representations by the University show how this can be achieved. This should be highlighted in the policy.
Thames Water	CA1a: Reading University Boat Club, Thames Promenade	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change proposed.
Thames Water	CA1a: Reading University Boat Club, Thames Promenade	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change proposed.
Thames Water	CA1a: Reading University Boat Club, Thames Promenade	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Caversham SPS and Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change proposed.
University of Reading	CA1a: Reading University Boat Club, Thames Promenade	<p>The University supports the inclusion of the Boat Club as a draft allocation within the Draft Plan. It is however considered that the site can potentially accommodate approximately 40 dwellings should use be made of areas of the site within Flood Zone 3. In order to do so, amendment would be required to the second bullet point.</p> <p>It is clear by the fact that the Draft Plan has an unmet need that there are no alternative sites appropriate for housing in areas with lower probability of flooding in line with NPPF para 101. Therefore, there is a case that the Council should consider further sites within areas of flood risk as to whether they are able, with mitigation, to accommodate housing without increasing flood risk on neighbouring property and / or land, or resulting in an unacceptable level of flood risk on the proposed dwellings.</p> <p>We consider that technical solutions are available to develop this site to a greater extent and</p>	<p>It is agreed that due to the fact that the full objectively assessed need cannot be met within Reading’s boundaries, the full site would likely pass the flooding sequential test. However, policy requires that an Exceptions Test be passed to allocate development in Flood Zone 3, and policy does not allow us to assume that technical solutions are available.</p> <p>The potential for relocation of the boat club building is noted, and should</p>

		<p>intend to submit hydrological evidence to reinforce the ability to develop within the areas of the site within Flood Zone 3. Therefore, we would advise a degree of flexibility. We suggest bullet point two of the draft Policy be amended to the following:</p> <p>“Take account of the risk of flooding, and locate development only in the portion of the site in Flood Zone 2, closest to Abbotsmead Road, unless it is demonstrated that suitable flood risk mitigation options are available to facilitate the development of a greater proportion of the site.”</p> <p>This would likely require Reading Boat Club to find an alternative suitable location. We consider that such a location is available, within the University’s ownership, which has a planning history (F/2012/2307) including a now lapsed previous planning consent for use as a boat club - the Dreadnought site, within Wokingham Borough Council’s area. It is in a highly accessible location, directly adjacent to the Thames Valley Park and Ride. Being located within Wokingham Borough would not pose an insurmountable barrier to relocation given the planning history of the site with a former planning consent for a boat club. In addition, Wokingham Borough Council have provided pre-application advice in March 2011 which confirmed their view at the time that a new boathouse in the Dreadnought location would be acceptable.</p> <p>We would accordingly recommend the following wording be included as an additional bullet point to Policy CA1a:</p> <p>“any development that would result in the loss of the Boat Club facilities shall not be approved unless an alternative location for the Boat Club be found and secured by legal agreement, or where it can be demonstrated that there is no longer demand for the facility.”</p>	be highlighted in the policy.
Norma and Julian Ansell	CA1b: Reading Golf Course	So far as we are aware the owners of the land have not put forward any request for any of their land to be included in the plan. Could you please clarify why the land has been included in the plan and whether South Oxfordshire have been advised that some of their land will be used to enable the development to proceed.	The land was submitted to the Council’s Call for Sites in March 2014 by Bewley Homes, with the support of the Golf Club. The issue has been discussed with South Oxfordshire, and whilst any proposal would need to be judged on its merits, no in-principle objection to the possibility has been raised.
Norma and Julian Ansell	CA1b: Reading Golf Course	The documentation accompanying the plan states that key open spaces remain subject to strong policy protection. Whilst the golf club is not public space it does provide many benefits to the community as a whole. Could you please explain how the loss of 3.7 ha of open space meets this undertaking.	No change proposed.
Cognatum	CA1b: Reading Golf Course	I would like to add our voice to that of the residents and owners of property at Lyefield Court and The Conifers, retirement estates located at Emmer Green, for which we are the freeholder and landlord. Residents at both estates are very concerned about the inclusion of the proposals	ECOLOGY: The part of the Golf Course identified is not a designated Wildlife Heritage Site/Local Wildlife Site. Previous ecology advice has not identified any particular significance.

		<p>for CA1b, on the draft Local Plan as a potential development site. Cognatum Estates shares these concerns and fully supports the local residents in their strong objections to these proposals. In particular I would like to highlight the following:</p> <ul style="list-style-type: none"> • The impact on the local infrastructure would be severe, and completely destroy the resident's peaceful enjoyment of their homes. • The loss of a valuable and much used leisure facility would be detrimental to a number of resident's health and well-being. • The Health and Safety of sometimes frail residents walking to local facilities will be put at risk with heavily increased traffic flows associated with such a large residential development. 	<p>TREES: There are a limited number of TPOs on site, which can be worked around.</p> <p>OPEN SPACE: The golf club is not publicly accessible open space. There is a very significant need for new housing, and this means that there cannot simply be blanket protection of undeveloped land.</p>
Megan Eigheten	CA1b: Reading Golf Course	<p>I wish to object to the proposal of developing Reading Golf Course for housing, due to the increased number of families in the area pushing out homes in Courtenay Dr out of catchment. Emmer Green Primary is already oversubscribed and will increase traffic to our roads. Primary schools are already hard enough without an excessive amount of new homes taking up some of the green space in our area.</p>	<p>TRAFFIC: Transport modelling work indicates that the local road network can generally accommodate the development. There may be local issues on specific roads identified through more detailed proposals which require mitigation at application stage. The policy identifies specific need for consideration of Kidmore End Road.</p>
Emma Fletcher	CA1b: Reading Golf Course	<p>I have major concerns regarding this level of development when our schools, local doctor surgeries and road networks currently cannot support what is already in place. Courtenay Drive is used as a cut-through from Kidmore End to Peppard Rd. This is dangerous to local pets and to children that live on the street. This development would have hugely detrimental effects on the residents of Courtenay Drive. With the risk of Chiltern Edge School closing, where are all the children living in these planned developments going to go? I strongly object to this development.</p>	<p>Crossing of the Thames is identified in TR2, and work on this is progressing.</p>
Emmer Green Residents Association	CA1b: Reading Golf Course	<p>The principal concern here is traffic generation in Kidmore End Road, which is a matter of considerable local feeling. The southern end of Kidmore End Road is in reality a single lane, and the junction with Peppard Road is busy and complex. This issue is recognised in the Plan, but any development application without an effective traffic solution will be vigorously resisted. There is also concern about the impact on local services. Reference is made to the provision of health facilities, which would be helpful. The bigger worry is about school places and particularly primary places. The Education section of the Infrastructure Delivery Plan does make reference to the pressures on education in the north west of the Borough, but it is not clear whether this related to Emmer Green in particular.</p>	<p>EDUCATION: It is recognised that the overall level of development proposed in Reading results in a need for education provision. This is recognised in the Infrastructure Delivery Plan, and further work will be undertaken on specific proposals, including a new secondary school in the Borough. It is understood that Chiltern Edge school may now remain open.</p>
Gregory and Andrea Grashoff	CA1b: Reading Golf Course	<p>We strongly object to the proposal and request its removal. Its inclusion is counter to two of the main expectations of the DLP - open spaces and heritage. The whole of Reading Golf Course was designated a 'Wildlife Heritage Site' and this remains the case and indeed should always remain so. The area is an important green space. Protected wildflowers thrive in parts and there are many and various tree species many of which are subject to Tree Preservation Orders. A multiplicity of fauna use RGC as a home and foraging area and any development would have a highly detrimental impact on this established balanced natural environment. Loss of green space and loss of recreation and amenity value of the current use would be highly detrimental.</p>	<p>HEALTHCARE: The policy requires provision of primary healthcare on</p>

		<p>Development would also cause further damage and harm. For example, increased traffic flow in the area would be highly negative given the current high density of housing, relatively narrow roads, already excessive on-road parking with resulting exacerbated local traffic congestion. Further, the flow of traffic across the Thames would substantially increase causing congestion in Caversham and the town centre. The promise of a third bridge in the document is clearly undeliverable, is not even mentioned on the DLP "Major Transport Projects" and is outside the remit of RBC.</p> <p>Adding more houses to the infrastructure would place an unbearable further stress on the infrastructure. Limited development in the local area has already stressed the infrastructure such that healthcare and schooling cannot properly be provided to the community locally. Local Doctors Surgeries are oversubscribed, local schools cannot even accommodate children who live within their catchment.</p>	<p>site.</p> <p>HEALTH AND SAFETY/AMENITY OF RESIDENTS: It is considered possible to develop in a way that does not put the safety and amenity of existing residents at risk, in line with policies in the Local Plan that will apply to any development.</p> <p>LOSS OF LEISURE FACILITY: The proposal set out in the plan will retain the golf club, and provide a new clubhouse.</p>
Bethan Howard	CA1b: Reading Golf Course	<p>I vote for 'absolutely no development' on Reading Golf Course. My reasons are:</p> <ul style="list-style-type: none"> - high increase in traffic noise and congestion - hundreds of vehicles added to our quiet roads with noise, congestion, pollution 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 going to school -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 - unacceptable impact of traffic on Courtenay Road if Kidmore End Road is 'protected'. - 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 this road is already dangerous with speeding vehicles, bus stop hazards and 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 	<p>AIR QUALITY AND NOISE: Development will need to mitigate any effects on air quality, or any exposure to poor air quality. This is an issue that affects much of Reading, and will need to be factored into development.</p> <p>WATER/WASTEWATER: The policy recognises that existing infrastructure may need upgrade. This will be for consideration between a developer and Thames Water.</p> <p>SOUTH READING: A significant level of development is already planned for South Reading, so it is not possible to simply develop in this area instead. Sites need to be used where they arise.</p>
Ann Jenkin	CA1b: Reading Golf Course	<p>Il strongly object to this development as the infrastructure is just not in place to cope with these new homes. The roads in this area is already stretched and absolute chaos in peak hours. The local schools are full to capacity, the doctors surgeries are not taking new patients.</p> <p>I realise new homes are needed but why isn't the larger picture looked at. There are many trees in this area the have TPO on them, it has just taken me 18 months to get some dead branches taken off. Emmer Green cannot take this type of development it would be destructive on the environment.</p>	<p>DETAILED MATTERS: In terms of detailed design, e.g. height, and other matters, the proposal will need to comply with policies in the plan, but</p>

Laura and Alistair Johnson	CA1b: Reading Golf Course	<p>We wish to object to the proposal of developing Reading Golf Course land at Kidmore End Road, Emmer Green for housing. Courtenay Drive is already being used as a cut through from the Golf Course to Peppard Road which will also be affected by the numerous houses that you are proposing on the land towards the Abbey Rugby club</p> <ul style="list-style-type: none"> • This development would add numerous vehicles to Kidmore End Road with noise, congestion, pollution and road safety hazards, especially children walking to school and the elderly. • There would be an increase in air pollution and significant risk to health especially children walking to school - something we are trying to encourage to enhance healthy living! • The additional houses will have a detrimental effect on the local health centre and doctors which is already under some considerable pressure. • These houses which no doubt will not be for first time buyers or the elderly, will therefore mean more families and more children in Highdown School which is already being squeezed and will be even more squeezed if OCD decide to close Chiltern Edge! • A negative impact on the green space and the environment • Noise and further light pollution - the green space is currently helping to act as an air filter from pollution in Reading • Kidmore End Road is already affected by the parking all down the side of the terraced houses - this development will create a bottleneck as more cars attempt to access this road. • The access to the proposed development on Kidmore End Road is unacceptable as already dangerous with speeding vehicles, bus stop hazards and dangerous overtaking. • Impact on more traffic on the road into Caversham which is already at a standstill every morning and sometime this starts at the Tesco's garage! 	the specifics of the scheme are not defined at this stage.
Mike Merrick	CA1b: Reading Golf Course	I wish to object to the proposal of developing Reading Golf Course land due to the increased number of families in the area pushing out homes in Courtenay Dr out of catchment. Emmer Green Primary is already oversubscribed and will increase traffic to our roads. Primary schools are already hard enough without an excessive amount of new homes taking up some of the green space in our area.	
Elaine Mountford	CA1b: Reading Golf Course	I would like to express my objection to the proposed new housing on the golf course site because our schools and roads are struggling to cope with the existing population.	
Rebecca Sherbird	CA1b: Reading Golf Course	I wish to object to the proposal of developing Reading Golf Course due to the impacts on local infrastructure as follows: additional vehicles cause noise, congestion, pollution and are a safety hazard; one stretch of the road is already down to one lane; Kidmore End is already used as a rat-run; insufficient school places especially if Chiltern Edge School closes; increased pressure on local health services; loss of green space and habitat; and inadequate water and sewerage provision. The size of the development is out of proportion with other recent garden infill and will risk further development after this initial phase.	
Toby Scammell	CA1b: Reading Golf Course	<p>Please could you respond to these points?</p> <ul style="list-style-type: none"> • Who will bear the brunt of the additional infrastructure needs? Currently, there are two 	

		<p>bridges into the main hubs SOUTH of the river, the train, and the motorway network. Placing the additional housing north of the river would place massive strain on an already near-dysfunctional system. Hemdean Road is very busy, and Kidmore End Road itself, one-way traffic along part of it. Given that this one-way area is adjacent to a playing field, one wonders how the air quality here, where many young children, the future generations would play, would deteriorate.</p> <ul style="list-style-type: none"> • Would the large additional infrastructure spend not be better spent in building the houses in an area where, say, there is already capacity- brownfield/not hilly/South Reading. The additional energy used to pull a car up a hill would not be wasted should the housing be on a relatively similar altitude as Reading station and major transit hubs. • Additional school spaces, and medical capacity would be required. • What would the proposed height of houses be? And for what type of use- family, flats, etc? • Any northbound traffic from the proposed development would travel into the Chilterns AONB. What steps have been considered to prevent this area being overrun with traffic? 	
Historic England	CA1b: Reading Golf Course	We welcome the requirement 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 the NPPF.	Noted. No change needed.
Natural England	CA1b: Reading Golf Course	<p>Suggested change:</p> <ul style="list-style-type: none"> • Provide a green link across the site from Kidmore End Road to the remainder of the golf course; • Avoid a net loss of biodiversity and provide for a net gain wherever possible by providing a green link rich in plant species and habitat opportunities." 	Partially agreed. Change proposed. The main thrust of the second bullet point can be incorporated into the first.
Harvey Smith	CA1b: Reading Golf Course	<p>This Policy seems contrary to at least one of the Vision statements, ignores the Council's own objections to the proposed Gladman development and completely ignores the very many concerns raised by the Emmer Green community in response to the 2016 version of the Draft Local Plan. Before including Policy CA1b in the final Local Plan, the Council should consider the following questions:</p> <ol style="list-style-type: none"> (1) Given the impact this Policy would have on green space in Emmer Green and on the character of Kidmore End Road, can the Council show in the Plan how this Policy is fully consistent with the final paragraph of the vision? (2) Can the Council explain in the Plan why nearly one fifth of the proposed homes for Caversham and Emmer Green should be concentrated in one very small area of Emmer Green, right at the most northerly point of the Borough, at the furthest point from the main travel routes? (3) The rationale for the Council's objection to the Gladman proposal still applies very strongly to Policy CA1b. Can the Council show in the Plan why the issues it raised as recently as January 2017 can now simply be ignored in relation to Policy CA1b? (4) Education provision at both primary and secondary levels is a major concern for residents in Caversham and Emmer Green. The one new primary school (The Heights) is remote from 	<ol style="list-style-type: none"> (1) The golf club is not publicly accessible open space. There is a very significant need for new housing, and this means that there cannot simply be blanket protection of undeveloped land. (2) Potential sites are not evenly distributed around Caversham and Emmer Green, and this informs how much development comes forward where. (3) The proposal is of a smaller scale than the Gladman proposal, and is within the existing urban fabric. Each proposal needs to be considered on its merits. (4) It is recognised that the overall

		<p>Emmer Green. 342 children from within the Borough currently go to Chiltern Edge secondary school (ages 11-16, no Sixth Form), which has recently been rated 'Inadequate' by Ofsted and Oxfordshire County Council is now consulting on its future. Can the Council show in the Plan that it can now increase the provision of education north of the Thames sufficiently in time to meet the demands of such a high number of new homes in Emmer Green?</p> <p>(5) Local health facilities are also stretched. Can the Council show in the Plan how it will expand these in time to meet the demands of such a high number of new homes in Emmer Green?</p> <p>(6) Kidmore End Road between the Golf Course and Peppard Road, which is a bus route (24), allows for traffic in one alternating direction only and is already congested at times. Can the Council show in the Plan how it will solve the road access situation in time to meet the demands of such a large number of new dwellings on this narrow residential road?</p> <p>If the Council has specific proposals to address these questions, then these should be set out clearly in the next version of the Local Plan so that the Emmer Green community can review them and make any further comments. If not, then Site-Specific Policy CA1b should either be removed from the Plan or reduced to a very small number of dwellings in keeping with the current character of Kidmore End Road and the local infrastructure.</p>	<p>level of development proposed in Reading results in a need for education provision. This is recognised in the Infrastructure Delivery Plan, and further work will be undertaken on specific proposals, including a new secondary school in the Borough. It is understood that Chiltern Edge school may now remain open.</p> <p>(5) The policy requires provision of primary healthcare on site.</p> <p>(6) Transport modelling work indicates that the local road network can generally accommodate the development. There may be local issues on specific roads identified through more detailed proposals which require mitigation at application stage. The policy identifies specific need for consideration of Kidmore End Road.</p>
Sport England	CA1b: Reading Golf Course	Sport England objects to the loss of this sports facility in the plan and requests further information from the Council as it conflicts with paragraph 74 of the NPPF	No change proposed. The draft allocation would not result in the loss of the facility. It would be dependent on the identification of land for replacement holes, and would involve a new clubhouse to secure the future of the facility.
Rachael Staines	CA1b: Reading Golf Course	Please can you send me more details about the proposal to build 130 houses on the car park at Reading Golf Club in Emmer green?	No change proposed.
Thames Water	CA1b: Reading Golf Course	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	Noted. No change proposed. The need to take account of this issue is reflected in the policy.
Thames Water	CA1b: Reading Golf Course	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development.	Noted. No change proposed. The need to take account of this issue is reflected in the policy.

		Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	
Historic England	CA1c: Land at Lowfield Road	We welcome the requirement 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 the NPPF	Noted. No change needed.
Thames Water	CA1c: Land at Lowfield Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change needed.
Thames Water	CA1c: Land at Lowfield Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Thames Water	CA1c: Land at Lowfield Road	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Caversham SPS and Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	CA1d: Rear of 200-214 Henley Road, 12-24 All Hallows Road, 4, 7 and 8 Copse Avenue	We welcome the requirement 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 the NPPF	Noted. No change needed.
Thames Water	CA1d: Rear of 200-214 Henley Road, 12-24 All Hallows Road, 4, 7 and 8 Copse Avenue	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change needed.
Thames Water	CA1d: Rear of 200-214 Henley Road, 12-24 All Hallows Road, 4, 7 and 8 Copse Avenue	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Thames Water	CA1d: Rear of 200-214 Henley Road, 12-24 All Hallows Road, 4, 7 and 8 Copse Avenue	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Caversham SPS and Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	CA1e: Rear of 14	We welcome the requirement for development take account of potential archaeological	Noted. No change needed.

	and 14a Hawthorne Road and 282-292 Henley Road	significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF	
Thames Water	CA1e: Rear of 14 and 14a Hawthorne Road and 282-292 Henley Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change needed.
Thames Water	CA1e: Rear of 14 and 14a Hawthorne Road and 282-292 Henley Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Thames Water	CA1e: Rear of 14 and 14a Hawthorne Road and 282-292 Henley Road	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Caversham SPS and Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	CA1f: Rear of 1 and 3 Woodcote Road and 21 St Peter's Hill	We welcome the requirement 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 the NPPF, although we would like to see "which should inform the development" added to the end of the fourth bullet point.	Noted. No change needed.
Emmer Green Residents Association	CA2: Caversham Park	The concern here relates to access. This is at present to the Old Peppard Road, which suffers congestion in term time because of traffic generated by the Hill Primary School.	Noted. Change proposed. The supporting text should be amended to refer to access as being one of the points that will need to be considered.
Emmer Green Residents Association	CA2: Caversham Park	The commitment to conserve the Listed Building and the Historic Park and Garden is welcomed. It is accepted that there will be implications from the change of use of the building, and these are acknowledged in the Plan. There would be considerable public benefit from providing access to the grounds. It will need to be born in mind that it would be desirable to provide a second way of entry to the site rather than just via the Old Peppard Road.	Noted. No change proposed.
Historic England	CA2: Caversham Park	We have no objection to Policy CA2 and, indeed, welcome 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 the NPPF. 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, rather than the acceptable number of dwellings being based properly on a rigorous assessment of the number of dwellings the building can acceptably accommodate.	No change proposed. It is accepted that an owner or developer may treat this as a target, however, it must be considered against policies. It is important to have a figure which can count towards the overall calculations.

Veronica Leeke	CA2: Caversham Park	I believe the best use of Caversham Park House and grounds would be as an arts centre, perhaps coupled with commercial or corporate office space to help fund it. There are no similar facilities north of the Thames for miles around and this could provide a much needed prestige site for this area and be significant for the major town of Reading as a whole. The day-to-day running of the arts centre could be done on a voluntary basis, perhaps with charity status, as with arts centres in many other boroughs. I wholeheartedly agree with the statement that; "any development or conversion proposals should open as much of the park as possible up to public access, including reinstatement of historic public footpaths."	No change proposed. The potential for use for visitor uses is recognised in the policy. However, the building is extremely large, and it is not clear at this point that an arts centre is deliverable in all or part of the building.
Bob O'Neill	CA2: Caversham Park	Perhaps a protection of historic importance should be put on Caversham Park to prevent this most historic important house being stranded in the midst of a sprawl of modern new-builds. The existing grounds and landscaping places this house in its history of Reading - the former Crawshaw family.	No change proposed. The site is already identified as a listed historic park, and the house and a number of other structures are listed.
Sport England	CA2: Caversham Park	Sport England requests that a requirement is made to retain the playing fields/sports pitches on this site and potentially make provision for ancillary facilities so that they can continue to be used by the community and the new residents.	Noted. No change needed.
Historic England	8.3: Caversham Park	Paragraphs 8.3.6 - 8.3.9 and 8.3.11: We welcome these paragraphs.	Noted. No change needed.
Historic England	Paragraph 9.1.4	We welcome this paragraph.	Noted. No change needed.
University of Reading	9.2: Strategy for East Reading	<p>The Council consider that East Reading is unlikely to be able to make any significant contribution to meeting significant development needs due to a number of heritage constraints (Conservation Areas and Listed Buildings) and due to the area already being densely developed.</p> <p>The Council also view that the University of Reading is a major focus internationally and a key principle (paragraph 9.2.1) is that the University of Reading's Whiteknights Campus will continue to develop to support the economy and function of the town, subject to the constraints of the site. The Council recognise that the University plays a vital role in Reading's economy and that there will continue to be a need for development to support that role at the Whiteknights campus. The Council states that this development will be supported, where it does not result in significant adverse effects (Draft Plan, paragraph 9.2.7). Given issues being raised concerning noise, parking and the sustainability of local services, as a result of the student population, the Council is supportive, in principle for an increase in purpose-built student accommodation.</p>	Noted. No change needed.
Historic England	Paragraph 9.2.1	We welcome key principle d. off this paragraph, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.	Noted. No change needed.
Historic England	Paragraph 9.2.6	We welcome the commitment to the "preservation" of heritage assets in East Reading as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF, although we prefer the term "conserved" to reflect better the terminology of the NPPF and as recognising that sensitive change can take place that maintains or even enhances the significance of heritage assets.	Agreed. Change proposed. The word 'conserved' should be used.
Thames Water	ER1a: The Woodley	On the information available to date we do not envisage infrastructure concerns regarding Water	Noted. No change needed.

	Arms PH, Waldeck Street	Supply capability in relation to this site.	
Thames Water	ER1a: The Woodley Arms PH, Waldeck Street	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Thames Water	ER1a: The Woodley Arms PH, Waldeck Street	There are public sewers crossing this site.	Change proposed. Supporting text should be amended to reflect this.
Historic England	ER1b: Dingley House, 3-5 Craven Road	We welcome the requirement 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 the NPPF.	Noted. No change needed.
Thames Water	ER1b: Dingley House, 3-5 Craven Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change needed.
Thames Water	ER1b: Dingley House, 3-5 Craven Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Thames Water	ER1b: Dingley House, 3-5 Craven Road	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Thames Water	ER1b: Dingley House, 3-5 Craven Road	There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer.	Change proposed. Supporting text should be amended to reflect this.
Historic England	ER1c: Land rear of 8-26 Redlands Road	We welcome the requirements 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 the NPPF.	Noted. No change needed.
Thames Water	ER1c: Land rear of 8-26 Redlands Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change needed.
Thames Water	ER1c: Land rear of 8-26 Redlands Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Thames Water	ER1c: Land rear of 8-26 Redlands Road	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall	Noted. No change needed.

		development in the catchment is known.	
University of Reading	ER1c: Land rear of 8-26 Redlands Road	The University support the inclusion of the Redlands Road site, referenced under draft Policy ER1c. It is considered that given the shortfall in housing within the Borough, that it is highly important that sites such as this are brought forward and opportunities for development maximised. The indicative capacity for the site of 12 - 18 dwellings is supported. The University wish to have the flexibility to utilise the site for educational purposes.	Noted. No change proposed. The supporting text in paragraph 9.3.4 recognises the potential for sites to be used for community use including education.
Historic England	ER1d: Land adjacent to 40 Redlands Road	We welcome the requirements 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 the NPPF.	Noted. No change needed.
Thames Water	ER1d: Land adjacent to 40 Redlands Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change needed.
Thames Water	ER1d: Land adjacent to 40 Redlands Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Thames Water	ER1d: Land adjacent to 40 Redlands Road	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	ER1e: St Patricks Hall, Northcourt Avenue	We welcome the requirements 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 the NPPF.	Noted. No change needed.
Thames Water	ER1e: St Patricks Hall, Northcourt Avenue	The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.	Agreed. Change proposed. The need to liaise with Thames Water on water infrastructure should be added.
Thames Water	ER1e: St Patricks Hall, Northcourt Avenue	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Agreed. Change proposed. The need to liaise with Thames Water on wastewater infrastructure should be added.
Wokingham Borough Council	ER1e: St Patricks Hall, Northcourt Avenue	This development should be given special consideration in the context of any Infrastructure Delivery Plan and the impacts to be mitigated upon Wokingham Borough Council in the Development Management Policies.	Noted. No change needed.

Victoria Blades	ER1f: Hamilton Centre, Bulmershe Road	This is a community facility, although slowly being taken over by RBC office workers (which causes problem parking on Hamilton Road)! Should remain community facility not dwellings. If dwellings are permitted - parking needs to be addressed!	Change proposed. This facility is expected to be surplus to requirements, but the policy ensures that loss should be justified. A criterion should be added to ensure that parking needs are accommodated off-street.
Thames Water	ER1f: Hamilton Centre, Bulmershe Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change needed.
Thames Water	ER1f: Hamilton Centre, Bulmershe Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Wokingham Borough Council	ER1f: Hamilton Centre, Bulmershe Road	This development should be given special consideration in the context of any Infrastructure Delivery Plan and the impacts to be mitigated upon Wokingham Borough Council in the Development Management Policies.	Noted. No change needed.
Historic England	ER1g: Alexander House, Kings Road	We welcome the requirement 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 the NPPF.	Noted. No change needed.
Thames Water	ER1g: Alexander House, Kings Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change needed.
Thames Water	ER1g: Alexander House, Kings Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Thames Water	ER1g: Alexander House, Kings Road	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Arthur Hill - Save Our Swimming CIC	ER1h: Arthur Hill Swimming Pool	<p>The company wishes to object to the proposal to change the land use category of the Arthur Hill site to allow residential development. The Arthur Hill site was donated to the local community for the benefit of the general public, and it is not appropriate for the Council to see the site for private development. We request that the current land use for the site be retained in the Local Plan, and that the site continue to be used for leisure, sporting and community activities.</p> <p>We do not support the local listing of the frontage. The external features of the building have limited heritage value and it is the internal arrangement of the pool, with cubicles surrounding the main pool, which gives the building its appeal and make it attractive to particular user groups, such as swimmers with disabilities.</p>	No change proposed. The reasoning for the closure of Arthur Hill is set out in the report to Policy Committee on 26 th September 2016. An Expression of Interest under the Community Right to Challenge was rejected at Policy Committee on 10 th April 2017. There is no realistic prospect of the site being used for continued swimming use, and a replacement is proposed at

		<p>We also consider that the proposal to building between six and ten dwellings on the site would alter the character of the local neighbourhood and would add unacceptably to noise, traffic nuisance and parking problems in Norwood Road and Rupert Street.</p> <p>We consider that at this point in time options for the future of the Arthur Hill site should be kept as open as possible, and actions which might constrain the future of the site should be avoided.</p>	<p>Palmer Park. The site is narrow and constrained, and, with provision proposed elsewhere, is an opportunity for residential development.</p> <p>The building is not locally listed, but the frontage does make a positive contribution to the streetscene and should be retained.</p> <p>It is not agreed that a development of the scale proposed would adversely affect the character of the street. The adjacent residential buildings are 4 and 7 storeys (including basement). The proposal would not appear substantially larger than the current building from the street.</p>
Arthur Hill - Online Petition (317 signatures)	ER1h: Arthur Hill Swimming Pool	<p>The Arthur Hill site was donated to the local community in 1911 for the benefit of the general public, and it is not appropriate for the Council to sell the site for private gain.</p> <p>We object to the proposal in Reading Borough Council's draft local plan to change the land use category of the Arthur Hill site to allow residential development and request that the current land use for the site be retained, and that the site continue to be used for leisure, sporting, and community activities.</p>	<p>No change proposed. The reasoning for the closure of Arthur Hill is set out in the report to Policy Committee on 26th September 2016. An Expression of Interest under the Community Right to Challenge was rejected at Policy Committee on 10th April 2017. There is no realistic prospect of the site being used for continued swimming use, and a replacement is proposed at Palmer Park. The site is narrow and constrained, and, with provision proposed elsewhere, is an opportunity for residential development.</p>
Victoria Blades	ER1h: Arthur Hill Swimming Pool	<p>This is a community leisure facility, and should remain so, not dwellings.</p>	
Historic England	ER1h: Arthur Hill Swimming Pool	<p>We welcome the requirement 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 the NPPF.</p>	<p>Noted. No change needed.</p>
Thames Water	ER1h: Arthur Hill Swimming Pool	<p>On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.</p>	<p>Noted. No change needed.</p>
Thames Water	ER1h: Arthur Hill Swimming Pool	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Noted. No change needed.</p>

Thames Water	ER1h: Arthur Hill Swimming Pool	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Thames Water	ER1h: Arthur Hill Swimming Pool	There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer.	Change proposed. Supporting text should be amended to reflect this.
Historic England	ER1i: 265-271 London Road	We welcome the requirements for development 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 the NPPF.	Noted. No change needed.
Thames Water	ER1i: 265-271 London Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change needed.
Thames Water	ER1i: 265-271 London Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
Thames Water	ER1i: 265-271 London Road	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.	Noted. No change needed.
Historic England	ER1j: Palmer Park Stadium Area	We welcome the requirements 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 the NPPF.	Noted. No change needed.
Sport England	ER1j: Palmer Park Stadium Area	<p>Sport England supports the Council's intention to replace the existing Arthur Hill Pool. However, Sport England is concerned that a number of criteria have been added that could potentially frustrate this potential development these include;</p> <ul style="list-style-type: none"> • Demonstrate that car parking to be lost can be replaced on or off-site, or is no longer required; • Ensure that there is no adverse impacts on the use of the park and its sport and leisure facilities; • Ensure that there is no adverse impact on the listed monument and its setting; • Take account of potential archaeological significance; and • Retain public rights of way across the site. <p>If this development cannot go ahead because of one of these issues, the Council should be seeking to ensure that an alternative site is given consideration in the Local Plan or preferably these issues are investigated before the allocation is made. If not the plan is advocating the loss</p>	No change proposed. These are all essential planning considerations that cannot be overlooked. Whilst they will influence the form and location of development, the Council does not consider that it is likely to make the development unviable. It should also be noted that larger scale swimming provision is also proposed at Rivermead, so this would not be the only facility available. Arthur Hill pool has already closed, and regardless of planning policy, there is no prospect of it re-opening due to the extremely

		of the existing facility without making provision for a replacement.	high costs of keeping it open.
Thames Water	ER1k: 131 Wokingham Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	Noted. No change needed.
Thames Water	ER1k: 131 Wokingham Road	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted. No change needed.
University of Reading	ER2: Whiteknights Campus, University of Reading	The University supports the Council's direction within Policy ER2 of the Draft Plan in that it seeks to continue the focus of development on at the Whiteknights Campus.	Noted. No change proposed.
University of Reading	ER2: Whiteknights Campus, University of Reading	It is suggested that the third bullet of Policy ER2 be amended to the following: "There will be no significant detrimental impact upon the general amenities of neighbouring residential properties."	Partially agreed. Change proposed. The criterion should refer to "amenity", rather than "general amenities", which would have a different meaning.
University of Reading	ER2: Whiteknights Campus, University of Reading	The final sentence of the first paragraph to draft Policy ER2 has been reworded, using in our opinion more appropriate language than Policy SA6 of the SDPD by introducing that access will be improved "where necessary".	Noted. No change proposed.
University of Reading	ER2: Whiteknights Campus, University of Reading	The second paragraph of draft Policy ER2 is a new insertion, stating that development which causes an increase in student numbers should be supported by an increase in student accommodation, such as new accommodation at the Whiteknights Campus or extension of nearby dedicated accommodation, which would be subject to other policies of the Plan. The University holds no objection to this new insertion.	Noted. No change proposed.
University of Reading	ER2: Whiteknights Campus, University of Reading	An addition has been made to the first bullet point of draft Policy ER2, adding that areas of wildlife significance and current or potential green links, will be retained or enhanced "and not detrimentally affected by development, including through light effects." The University also holds no concerns to this insertion.	Noted. No change proposed.
University of Reading	ER2: Whiteknights Campus, University of Reading	Finally, the University notes there is a difference within the supporting text when compared to that included within the SDPD. The SDPD at paragraphs 14.3.5 and 14.3.6 include the following which have been omitted from the Draft Plan (reference paragraph 9.3.9 of the Draft Plan) but should be re-inserted: "The Development Plan does not form part of the Council's strategy, but it outlines the changes that are proposed to occur on the site in the coming years, and has informed this policy." And "Proposals within the Whiteknights Development Plan include rationalising the substantial number of vehicle access points around the campus. Given that growth is likely to occur on the campus, it is vital that access points are appropriately located. The Council is therefore supportive of this principle in the Whiteknights Development Plan."	Agreed. Change proposed. These elements should be re-inserted into the supporting text.

University of Reading	ER2: Whiteknights Campus, University of Reading	The University continues to support the inclusion of the Whiteknights Campus as an allocation, allowing the flexibility to provide development as required over the Plan period, to include additional student, staff, teaching and research accommodation, infrastructure and services, and sports and leisure facilities among other uses.	Noted. No change proposed.
Bracknell Forest Borough Council	ER3: Royal Berkshire Hospital	Bracknell Forest Council has concerns over the wording of the third paragraph in Policy ER3, which states that "...would be supported where it would ensure that such a move would enhance its accessibility to Reading residents...". Any new site would need to be accessible to all those living within its catchment, including residents of Bracknell Forest and other users.	Agreed. Change proposed. The wording should be amended to refer to Reading and the rest of the hospital's catchment.
Royal Berkshire NHS Foundation Trust	ER3: Royal Berkshire Hospital	RBFT welcomes the allocation of the Royal Berkshire Hospital under Draft Policy ER3. The emerging policy reflects the intentions and ambitions of the RBFT to enhance and intensify medical services and facilities available within the hospital site. A full Estates strategy is in development, with a review of the existing assets currently being conducted across the hospital campus. This review seeks to inform a detailed action plan, through which operational, vacant and surplus land will be identified for refurbishment and redevelopment. As promoted by the Naylor review, the financial capital released by the disposal of surplus land would be used to fund new and refurbished clinical and administrative facilities, to provide the highest quality of services to the Reading community. RBFT acknowledges that its estate comprises heritage assets, is adjacent to conservation areas, and is in a sensitive highways location. RBFT will, in all instances, be instructing appropriate surveys and technical work in support of any refurbishment and redevelopment proposals to come forward for the RBFT assets.	Noted. Change proposed. The supporting text should highlight that work is underway on an estates strategy.
Royal Berkshire NHS Foundation Trust	ER3: Royal Berkshire Hospital	It is proposed to expand Draft Policy ER3 to include 17 Craven Road (the Old Headmaster's House), the currently vacant 'Maintenance Shed' adjacent, and the land these premises sit within. The site is proposed to accommodate intensified clinical and clinical-administrative functions in the long term, although may be used in the short term to accommodate temporary structures enabling decant of clinical facilities from other blocks. This aligns with the intent of emerging policy ER3, thus CBRE encourage RBC to simply expand this allocation to include these premises. The Grade II listed status of the "Old Headmaster's house" within the site is recognised, and any development brought forward would be of a high design standard and have appropriate regard to the relevant heritage planning policies. The proposed uses will be in accordance with the general development principles outlined in emerging Policy ER3 to support the vital services the hospital provides not only to Reading but the wider surrounding areas. The strategy for 'Health' in the IDP states that nationally 'there is a move to reconfigure health service delivery into larger, more fit-for-purpose facilities to provide a wider range of services'. The extension of this allocation to include the identified properties on Craven Road reflects this nationwide approach, as RHFT seek to provide new, fit for purpose, flexible hospital facilities for the residents of Reading.	Agreed. Change proposed. The boundary of the site should be changed to incorporate 17 Craven Road and the adjacent land. Amendments should be made to the policy and supporting text to reflect that an additional listed building is within the site.
Royal Berkshire NHS Foundation	ER3: Royal Berkshire Hospital	Paragraph 9.3.13 of the Draft Local Plan acknowledges that the listed, 19th century London Road hospital building (known as the "North Block") has limited suitability for modern clinical	No change proposed. Whilst it may be possible that there is scope for

Trust		<p>requirements. RBFT's review of the estate to date suggests considerable market interest in the partial conversion of this building to accommodate residential uses instead. This will, of course, present significant challenges in terms of heritage and design, however RBFT are confident that a partial residential change of use can be successfully delivered and would drive a capital receipt that could be reinvested into the wider estate. We'd suggest the policy wording is modified to include the sentence: "Where it can be demonstrated that hospital premises are surplus to operational requirements, the conversion or redevelopment of buildings for residential uses will be supported". Under the emerging CSS, there would be no co-location benefits of providing additional administrative accommodation in this location. The "Old Maids" block, which is next to the North Block and currently vacant due to needing significant refurbishment, offers a considerable amount of floorspace suitable for the relocation of clinical-administrative functions, into which the existing functions of the North Block could be decanted.</p>	<p>alternative uses in the future, this will require considerable justification both in terms of loss of the hospital use and the use of the listed building. This justification is best provided and assessed at application stage.</p>
Royal Berkshire NHS Foundation Trust	ER3: Royal Berkshire Hospital	<p>Princes House is not put forward as a residential allocation as it has existing prior approval, but this has now lapsed. As such, these representations are submitted in promotion of a new residential allocation for Prince's House. The principle of residential use on site has been established through the prior approval in June 2015, and therefore the site is considered 'deliverable' in the context of footnote 11 of the NPPF. The site is in a suitable location fronting London Road, is available now, and is achievable to be delivered within five years.</p> <p>RBFT's review of the estate to date suggests considerable market interest in this building, with interest in the full redevelopment of the site as well as its conversion under permitted development rights. Notwithstanding planning considerations such as amenity, townscape, heritage and access, RBFT would prefer to intensify the residential capacity of the existing building, compared to that secured under the prior approval application. This would allow RBFT to realise an increased capital receipt from the asset, for reinvestment back into its wider estate. An indicative capacity of 26-40 dwellings is suggested, pending detailed architectural and planning appraisals. This site would provide a positive contribution to the housing provision for Reading, by utilising previously developed land and support the Borough in achieving the OAN.</p>	<p>No change proposed. It is agreed that the principle of conversion to residential use is established by the prior approval. A Local Plan allocation is not required for a proposal to convert in line with the prior approval due to the permitted development rights, and the Council also has limited ability to control a conversion for a greater number of units under the existing law.</p> <p>An allocation would therefore only be necessary if it was proposed to either redevelop or extend. There are considerable sensitivities around the site. It is within a conservation area, adjoins a number of listed buildings on several sides and has tree preservation orders on site. At usual urban densities, a redevelopment would be likely to achieve around 12-14 dwellings, and this does not give the intensification referred to in this representation. The acceptability of anything more significant would depend very much on detailed design,</p>

			and the Local Plan is not in a position to advocate it.
John Wilkins	ER3: Royal Berkshire Hospital	The plan comments on parking at the Royal Berks Hospital but does not even hint at possible solutions apart from moving out of town (an expensive very long term possibility) and more use of buses. This will not solve the problem as many will not be easily diverted to buses. Could RBC encourage the building of a second multi-level car park at the south end of the site? What other realistic possibilities could be considered?	No change proposed. There would be significant traffic generation issues with encouraging significant additional car parking on the site, which is why public transport use should be promoted wherever possible.
Natural England	Paragraph 10.1.8	Suggested change: "...and for any site-specific infrastructure, including green infrastructure, not covered by the CIL Regulation 123 list."	No change proposed. This is a general statement, and it is not appropriate to highlight one specific type of infrastructure here.
Roxhill Developments Ltd	Figure 10.1	Given that a planning application is currently in preparation for SR1a (and the RBC Sustainability Appraisal recognises that the sub-area SR1a is deliverable), it is considered that the indication of the 'Overall Timescale' for the development of the site given in Figure 10.1 should be amended from "Medium (2021-26) - Long (2026-31)" to "Short (2016-21)".	Agreed. Change proposed. The figure should reflect the short-term potential, but it is considered optimistic that a development of this scale would be complete within 3 years of submitting a planning application, so it should show short to medium term.
Basingstoke and Deane Borough Council	10.3: Infrastructure Delivery Plan	The Plan should be supported by an assessment of the additional pressures upon transport infrastructure resulting from the increased population and employment floorspace. In particular, this should consider any impacts upon the A33 between Reading and Basingstoke and any other road or rail improvements that are necessary.	No change proposed. A transport assessment will be included in the evidence base.
Jane Bickerstaffe	10.3: Infrastructure Delivery Plan	The population of Reading keeps growing so more schools will be needed. I recommend that whenever permission is granted for new housing, there must be a requirement for evidence that school places are available or for new schools to be built.	No change needed. Adequacy of education provision is considered at application stage and dealt with in by policy CC9.
Canal and River Trust	10.3: Infrastructure Delivery Plan	We hope that the Council recognise the importance of the waterway as a multi- functional asset the Council within the IDP and in future in the Regulation 123 list. This would be in line with the existing policy backing provided by West Berkshire District Council and would recognize the cross boundary nature of the waterway and comply with the duty to cooperate.	Partially agree. References to Reading's waterways and riparian corridors have been added to the IDP schedule in accordance with the Environment Agency's suggestions below. We are not consulting on changes to the Regulation 123 List at this time.
Environment Agency	10.3: Infrastructure Delivery Plan	In the infrastructure delivery plan it appears that only Reading STW has been proposed to receive the effluent from the new housing. Please can you clarify to us whether this is this the case or not?	No change proposed. This is the case.

Oxfordshire County Council	10.3: Infrastructure Delivery Plan	<p>On the basis set out in paragraph 3.1.7, the scale of proposed housing growth would need up to 15 new primary schools (or a smaller number of larger new primary schools) and 2-3 new secondary schools, unless there is existing surplus capacity. The Infrastructure Delivery Plan (IDP) page 32 explains that, Borough wide, there is a lack of surplus capacity within primary and secondary schools.</p> <p>The IDP only specifies one additional form of entry in primary school capacity expansion (Moorlands Primary School). While it notes that additional secondary and primary school capacity will be needed, there is currently a lack of detail on how the significant additional school places will be provided. If the Local Plan does not include sufficient additional school capacity to meet the generated demand, surrounding local authorities, including Oxfordshire, will need to understand the potential impact on their own schools.</p> <p>The Local Plan includes only 700 new homes in the north Reading area, adjoining Oxfordshire - most of the planned growth is for central or south Reading. This suggests that the direct impact on demand for school places in Oxfordshire will be relatively low, but any changes in the balance between supply and demand of school places elsewhere in Reading could have knock-on effects. In addition, changes within Oxfordshire may result in Oxfordshire schools being less able to accommodate Reading children. The housing growth permitted/ planned/ proposed in this part of Oxfordshire may reduce the ability of schools in Oxfordshire to continue to take as many Reading pupils in the future, and increase pressure on Reading Borough schools.</p> <p>Chiltern Edge School is currently in Special Measures, and Oxfordshire County Council is consulting on whether to propose closure. If Chiltern Edge School closes, approximately 60-90 Reading children per year group would require alternative school places. While it may be possible to create sufficient additional school places in Oxfordshire to absorb some of this displacement, it would be expected that most of the Reading pupils would seek alternative schools in Reading, adding to the need for secondary school places in the borough. Conversely, if Chiltern Edge School remains open, it will continue to be heavily dependent on Reading pupils to sustain its viability. Strategic planning for school places in Reading will therefore need to take the future of Chiltern Edge School into account.</p>	<p>Noted.</p> <p>The calculations referred to here are somewhat crude, given that Reading will be likely to provide a significantly larger proportion of smaller, town centre housing than its neighbours. Some of the provision can also be met by on-site expansion.</p> <p>The IDP should be enhanced with more information on education needs. This includes an additional secondary school, and work is underway on identifying a site. There should also be recognition of the scope to meet education needs in the town centre Major Opportunity Areas and in Land North of Manor Farm Road.</p> <p>It is understood that Chiltern Edge school may now remain open.</p>
West Berkshire District Council	10.3: Infrastructure Delivery Plan	<p>West Berkshire District Council's Education Service has advised that the closest developments to West Berkshire's borders are in West Reading, in particular around Birch Copse Primary School. The developments are far enough from the border, however, to ensure that children living within West Berkshire district are not displaced by Reading pupils. There is already a lot of movement in this area, and West Berkshire schools tend to be popular with Reading families. It is likely that the proposals will not increase demand for our school places, but will sustain the current levels of demand.</p> <p>According to data on Reading Borough Council's website there are places at schools in their</p>	Noted. No change needed.

		administrative area and so it is possible that this will absorb some or all of the impact these developments will create.	
West Berkshire District Council	10.3: Infrastructure Delivery Plan	<p>West Berkshire District Council will continue to work with Reading on a potential mass rapid transit route, Park and Ride, and other cross-boundary transport issues. West Berkshire District Council supports the Infrastructure Delivery Plan (IDP) which supports the draft Reading Local Plan especially the proposed mass transit system but notes that there is no reference in the IDP to the M4 junction 11.</p> <p>In terms of the possible large development opportunity in the Grazeley area, West Berkshire District Council notes that further development in this area would impact on the M4 Junction 11. Despite having a major upgrade in recent years, this junction is still an issue with regards to traffic congestion. This leads to additional traffic through areas within West Berkshire such as Burghfield. Given that West Berkshire District Council will be involved in discussion regarding that development opportunity; the Council will highlight this issue as required as part of that process.</p>	<p>Noted. No change proposed.</p> <p>It is recognised that the identification of Grazeley will entail very significant infrastructure improvements in terms of transport. As it is not a proposal of the Reading Local Plan, the IDP does not set out the necessary infrastructure, which will need to be developed alongside the proposal itself, involving joint work with WBDC, WBC and RBC.</p>
Environment Agency	Figure 10.2	With regard to the Thames Parks Plan, there should be a stronger emphasis on enhancement of the ecological value of these parks, not just a focus on recreation, amenity and landscape.	Agree. Change proposed.
Environment Agency	Figure 10.2	The Open Spaces Strategy should have a focus on ecological enhancement. The Biodiversity Plan should ensure that watercourses and their associated corridors are included.	Partially agree. Change proposed. Agreed that Biodiversity Plan should refer to watercourses, but the Open Spaces Strategy has a range of important elements, and singling out ecology here is not appropriate.
Environment Agency	Figure 10.2	Within the 'Green' section (pages 29 to 31) of this document, greater emphasis should be placed on the role of watercourses and their riparian corridors to provide many aspects of this, particularly in relation to enhancing these as part of the 'coherent ecological networks' referred to in the NPPF.	Agree. Changes proposed.
Jenny Cottee	Figure 11.1	<p>It is important that annual monitoring reports include monitoring the implementation of key policies. As well as the two purposes given in 11.1.1 the AMR acts as a reminder and deterrent against possible attempted breaches. Monitoring key policies would influence behaviour in a similar way that reporting achievement data of schools influences behaviour of both school professionals and parents. Thus I request that policy EN8 is monitored.</p> <p>Figure 11.1 Monitoring Framework should include EN8 thus: Undesignated Open Space En8 no nett loss annual RBC annual AMR</p> <p>Furthermore I want all cases when compensatory provision has been provided following the permission to develop undesignated open space to be listed along with the area lost to development and the area provided under compensatory provision requirements.</p>	Partly agreed. Change proposed. The existing monitoring indicator can be expanded to include undesignated open space.

		<p>It is true that few people will read the AMR. However included amongst those who will be those who are influential. It is important to demonstrate that the Local Plan intentions and requirements are real. It is better to have more detailed AMR than to undertake the process of revising the local Plan before the scheduled timing. For example I welcome policy EN8, being a like for like replacement of policy CS28 in the current Local Plan, and the explanatory comments in 4.2.31 and 4.2.32 . Unfortunately it is not within the powers of the Local Plan to ensure land owners of allotment sites actually rent out plots rather than overseeing a return to nature in the hope of considerable financial gain. The AMR process reporting the implementation of the Local Plan would help to highlight breaches of the intentions of the Local Plan.</p>	
Jenny Cottee	Figure 11.1	<p>I disagree with the target for the amount of public recreational space. It is unacceptable to suggest that there should be no nett loss over the 20 year life the plan when it is planned that the housing and hence population will increase significantly. I propose that the amount of recreational space should at least keep pace with 50% of the population growth, ie there would be some rise in provision but to reflect pressures it would not keep pace with the population growth. Thus the target for EN7-EN9 should be changed to reflect this intention in the most effective way.</p>	<p>Partly agreed. Change proposed. There should be monitoring of new public open space provision as part of new developments. At this point, it is not possible to identify a specific numerical target.</p>
Jenny Cottee	Figure 11.1	<p>With regard to the 'Area of Biodiversity Action Plan habitat' indicator, rather than having a target of 'No net loss', there should be a more stretching target for positive gain.</p>	<p>No change proposed. The monitoring indicators should link to the provisions of the policies, and whilst biodiversity net gain is cited, the plan does not require provision of specific BAP habitat.</p>
Hampshire County Council	Other issue	<p>We acknowledge that the Joint Minerals and Waste Plan will cover off most of issues associated with waste in the Reading area (generated through the increasing number of people moving to the borough and the emphasis on new residential developments, including the generation of construction waste).</p> <p>However, we would support the view that has been set out on page 23 of the Infrastructure Delivery Plan; that the waste policy strives to promote sustainability, increasing the value of recovered waste and decreasing the amount of waste sent to landfill. We also support the work of the RE3 partnership; sharing best practice and collaborating to produce joint work programmes.</p> <p>There are also three safeguarded sites that sit just within Hampshire but are close to the Berkshire border (Mortimer Quarry, Chandlers Farm, Eversley, and Highclere Waste Water Treatment Works). There are not many references to minerals in and around Reading, but as stated above, we acknowledge that this will be covered in the Joint Minerals and Waste Plan that is currently being produced with three other Berkshire authorities.</p>	<p>Noted. No change needed.</p>

Hampshire County Council	Other issue	Please note that safeguarding requires any proposed development to avoid prejudicing the continued use of safeguarded minerals and waste infrastructure.	Noted. No change needed.
Veronica Leeke	Other issue	I have not been able to find mention anywhere in the Draft Local Plan about the council securing land to sell off at reasonable price for self-build, including community builds. This is a good way for the next generation to be able to achieve their own properties and must be given serious thought.	Self-build is dealt with in policy H2. However, with resource constraints and a very significant need for affordable housing, purchasing land for self-build is not a priority.
Bob O'Neill	Other issue	Why is there not a HELLA with SODC? You have both agreed against the Gladman development on Reading's north boundary.	No change needed. Each authority must carry out its own HELAA, in line with its own timescales.
Reading Urban Wildlife Group	Other issue	<p>Green walls/green envelope is important for biodiversity and also for air pollution, noise and heat retention in cities, as well as visual improvement.</p> <p>The Ove Arrup report "cities alive" considered the impact of green buildings in five cities from the point of view of air pollution, noise and heat with modelling to quantify impact. Their main findings were:</p> <ul style="list-style-type: none"> • Green façades can result in local reductions in concentrations of particulate matter, typically between 10 and 20%. • Green façades can reduce sound levels from emergent and traffic noise sources by up to 10 dB(A). • Green façades are most effective in reducing UHI in cities with a height-to-width (H/W) ratio greater than 2 - peak temperature reductions of up to 10°C having been modelled. <p>In general, green facades have multiple benefits for the denser areas of the town whereas street level planting is important for lower level development and where there is extra width between housing Our suggestion is that green facades should be incorporated in high rise new developments, particularly when several blocks are proposed next to each other or when a new high rise is proposed to fill in an area with existing tall buildings.</p> <p>In addition, retrofitting a green façade on high rise buildings at important road junctions with low air quality should be one of the mitigation options for new development. The local plan should identify, or require a supplementary document, that identifies the areas of the town where mitigation is most needed to focus the minds of developers.</p>	No change proposed. Green walls are referenced in a number of parts of the plan, including CC2, CR2 and CR10.
Reading Urban Wildlife Group	Other issue	<p>Front gardens and parking areas are a large hectarage that could provide additional biodiversity and is responsible for water run-off in the urban area.</p> <p>Although there is legislation requiring planning permission to cover front gardens with impermeable surfaces and hence reduce run-off, this isn't totally successful in encouraging</p>	No change proposed. The specific design requirements suggested are very prescriptive. Policy EN18 on sustainable drainage contains the appropriate level of Local Plan policy.

		<p>surface water to infiltrate the ground. This is partly because the (usual) pavers get clogged up with weeds/moss over time and reduce permeability and also because there is a secondary market by companies offering to seal paved areas to reduce the weed problem. There is also the problem that most retrofitted gardens are fully paved over rather than leaving some vegetative areas. It is obvious that small areas of grass in front gardens are a pain in the neck for ongoing maintenance, particularly when access from the back is restricted and mowers must move through the house.</p> <p>It would be better to require developers to provide a permeable hard area for two cars in front of each new house with slopes giving water run-off to planted areas around the front garden, or between the car spaces. The RHS provide a range of concepts, designs and planting schemes under their "Greening Grey Britain" initiative.</p>	
Jan Steele	Other issue	It would be good to see rotunda type pillars for posters such as one sees in Paris and other European cities.	No change proposed. This is too prescriptive for the Local Plan.
Evelyn Williams	Other issue	The 1970s Spring Gardens Estate preserved a short terrace (now 63-69) on Waterloo Road as an example of what the housing in the area looked like before it was demolished. This terrace should be accorded the same special status/ protection as Blake's Cottages etc in the Central Area.	No change proposed. The context here is very different to the town centre, where small terraces are set within high density development. There is a substantial amount of traditional terraced housing remaining in this area, and it is not considered that these houses merit special protection.
Evelyn Williams	Other issue: Allotments	<p>I do not think that the need for allotments is currently being met. Waiting lists for allotments are no longer published so an applicant cannot see whether the plot nearest them has vacancies or not.</p> <p>Councils have a statutory duty to provide allotments. Large new housing estates such as those planned and being built in South Reading should include adequate allotment provision. As with the provision of housing, RBC should look at the needs of people for different size allotments or Community Gardens. Statutory allotments have more protection than outlined in EN8. If all RBC allotments were made "statutory" it would be a good move.</p>	No change proposed. With many demands for land, the Council must prioritise scarce available land, within the context of national planning policy.
TJ Cook	Other issue: Micro-generation	I see nothing to do with micro-generation of energy in this document?	No change proposed. The sustainability policies include general support for measures that promote sustainability.
Kate Slater	Other issue: Theatre/arts	<p>Having read the Leisure section on your draft document, I am surprised to see that there is no mention of theatrical premises.</p> <p>You mention several times that Reading is the major centre in the area and yet we need to travel</p>	No change proposed. Policy CR11 highlights the need for replacement of the Hexagon theatre.

		to Oxford or London for a theatre or go to the streamed NT productions in the cinema. This is disappointing.	
Jan Steele	Other issue: Theatre/arts	Emphasis on arts development. The first thing to do here is coordination of publicity for what is already going on in Reading, Windsor, Bracknell, Maidenhead, Slough and Newbury. I'm constantly coming across high quality practitioners of different arts but they often don't seem to know about each others work - and it's surprisingly difficult to get the publicity out.	Noted. No change proposed. This is not a matter for the Local Plan.
Jan Steele	Other issue: Theatre/arts	We need a really good arts centre with a really good theatre.	No change proposed. Policy CR11 highlights the need for replacement of the Hexagon theatre.
Historic England	Other issue: Other designated heritage assets	We consider that, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF. 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.	No change proposed. Listed buildings and historic parks are already covered by the general heritage policies. Listed buildings and parks are often, by their nature, unique. It is difficult to see how a policy could set out their important elements without going through each one individually.
Environment Agency	Other issue: Evidence Base	The current draft plan does not include an up-to-date SFRA including the incorporation of the latest climate change allowances. This evidence is required to inform the sequential test, exception test, the flood risk policy and the supporting text. Please can you confirm that the level 1 and level 2 SFRA are still under review.	No change proposed. The Level 1 SFRA was published in June 2017, and a Level 2 SFRA is in preparation and will be published to support the plan.
Environment Agency	Other issue: Evidence Base	In our last consultation response (February 2017) to the draft level 1 SFRA consultation we expressed concern that the SFRA had not clearly defined the functional floodplain (FZ3b). You have stated that the 1 in 20 year flood event is only a starting point to define the functional floodplain and that it would be defined by the local authority.	No change proposed. The Level 1 SFRA was published in June 2017, and it addresses this issue.
Environment Agency	Other issue: Evidence Base	As noted in the local plan, regeneration of existing sites is key to delivering the local plan due to the limited space available in the borough. We wish to remind you that any sites within Flood Zones 2 or 3 need to be justified in the sequential test.	Noted. The Sequential Test was incorporated into the HELAA methodology, so it has been carried out, but it is agreed that it needs to be presented separately. It will be available at Pre-Submission stage.
Environment Agency	Other issue: Evidence Base	We have asked if FZ3b is going to split into developed and undeveloped areas. It is likely that we will object to any sites in FZ3b on policy grounds where the density of development is increased or there is an increase in the vulnerability classification. The only rural areas that are not yet developed are all in the floodplain. A defined functional floodplain (shown on a map) is required to not only apply the sequential test for sites put forward in the local plan, but also for any windfall sites as they come forward.	Noted. The Level 2 SFRA has defined the functional floodplain. It is worth noting that the Local Plan does not propose any development on sites in Flood Zone 3b.
Environment Agency	Other issue: Evidence Base	The SFRA is still in the process of setting a methodology to assess how the new climate change allowances affect any sites. Until this assessment has been done, we cannot be confident that	No change proposed. The SFRA has now concluded and has been subject

		the plans for these sites are deliverable and therefore are uncertain at this time how your draft plan meets the soundness test of effective. For the exception test to be passed, any flood risk mitigation needs to be designed up to the 1 in 100 year plus the appropriate climate change allowances.	to liaison with the Environment Agency.
Environment Agency	Other issue: Evidence Base	<p>A Level 2 SFRA is needed for any site allocations put forward in Flood Zones 2 and 3 and also sites close to Flood Zone 2 if it is thought that climate change could affect the site. We have not seen the level 2 SFRA which would provide more detailed evidence of the level flood risk to these sites, which in turn would enable confidence that these sites will be deliverable.</p> <p>The Level 2 SFRA will also inform the exception test and any site specific policies that are needed to mitigate against flood risk. The new climate change allowances may make safe access and egress impossible for some sites. This includes for sites in Flood Zone 1 that can be classed as 'dry islands' (sites where development is in Flood Zone1 but surrounded by the 1 in 100 year plus the appropriate climate change extent).</p>	No change proposed. The Level 2 SFRA is in preparation and will be published to support the plan, together with the Exception Test,
Environment Agency	Other issue: Evidence Base	The draft proposal maps do not show the flood zones so it is not easy to see how many sites fall within them.	No change proposed. It is not possible to show the flood zones in full without obscuring other important information.
Environment Agency	Other issue: Evidence Base	<p>We strongly recommend that you undertake a water cycle study or a water quality assessment to help determine if the proposed growth in your plan will be compliant with national planning policy and the water framework directive (WFD) and its objectives.</p> <p>You will need to clearly demonstrate that your proposed growth will not adversely impact water quality which will help to demonstrate that your local plan is deliverable and compliant with National Planning Policy Framework (NPPF) paragraphs 109, 158, 165 and 173.</p> <p>We need to know that the proposed growth does not lead to a deterioration in WFD status of the receiving rivers and that it does not prevent the future target status objectives being achieved. Infrastructure capacity is only one aspect that needs to be considered (e.g. capacity of the sewer network to accommodate the increased flows). Environmental capacity is the other key consideration which has not been assessed. For example there may be infrastructure capacity to accommodate the increased effluent, however this does not tell us if the increased effluent flow would lead to a deterioration in WFD status for ammonia, biochemical oxygen demand (BOD), and Phosphate. With the amount of growth that is proposed over the plan period, it is strongly recommended that a Water Cycle Study (WCS) or if appropriate a water quality assessment is completed as it will form part of the evidence base to support the local plan.</p> <p>As part of the duty to co-operate with neighbouring authorities it is important to consider the cumulative impact of growth on the receiving water courses. For example there may be cases where more than one authority are planning on building homes within the same sewage</p>	No change proposed. It is noted that Water Cycle Studies are not a requirement of national policy, and with resource constraints, each authority must consider what represents a proportionate evidence base. The full evidence base will be available on submission.

		treatment works (STW) catchment. If both are assessed in isolation, this may lead to an underestimation of the impact on the water environment. Any WCS assessment should have a joint approach and information sharing between the authorities is important.	
Highways England	Other issue: Evidence Base	<p>The evidence referred to in the IDP on transport impacts has not been provided as part of the Draft Local Plan consultation.</p> <p>We look forward to seeing the transport modelling evidence work that has taken place. To confirm that the Local Plan is deliverable, this work must demonstrate 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.</p> <p>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 next Revised Draft Local Plan.</p>	Noted. No change proposed. The transport modelling evidence has now been provided to Highways England.
Historic England	Other issue: Evidence Base	<p>We have been unable to find any reference to the evidence base for the Plan on the Council's website. 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?</p> <p>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.</p>	No change proposed. With resource constraints, each authority must consider what represents a proportionate evidence base. The full evidence base will be available on submission. However, there is a list of locally important buildings, which is on the Council's website.
Sport England	Other issue: Evidence Base	<p>Sport England is aware that work is yet to be completed on the Council's Playing Pitch Strategy. It is essential that this work is completed to inform the Council's development plan and Sport England has undertaken to assist the Council with this. This work is essential to help inform the Council's Infrastructure Delivery Plan.</p>	No change proposed. The Playing Pitches Strategy is being finalised and will be published when available.
Network Rail	Other issue: level crossings	<p>Councils are advised that level crossings can be impacted in a variety of ways. Development proposals' affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision.</p> <p>As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any</p>	Noted. However, there are no level crossings within Reading Borough. The nearest footpath crossings are just outside the Borough boundary, and not in a location where development is expected to lead to any significant increase in use. The nearest road level crossing, at Upton Nervet, is over 6 km from the Borough boundary.

		<p>future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services.</p> <p>In this regard, we would request that the potential impacts from development affecting Network Rail's level crossings is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker and a proposal has impacted on a level crossing. We request that a policy is provided confirming that:</p> <ul style="list-style-type: none"> • The Council have a statutory responsibility to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway: • Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and • The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed. 	
Network Rail	Other comments: Planning applications	We would appreciate the Council providing Network Rail with an opportunity to comment on any future planning applications should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make. In this regard Network Rail would draw the council's attention to the Town and Country Planning (Development Management Procedure) (England) Order 2015 (16).	Noted. No change needed.
Jane Bickerstaffe	Other site	A school At Bugs Bottom was originally planned but never built. The children therefore have to travel (mostly by car) to other schools. If a school had been built there, the children could have walked which would be good for their health and better for the environment because it would have reduced traffic pollution. There is more than sufficient space still available for a school and to maintain a large area of green space. The Council should start building a school as soon as feasible.	No change proposed. Bugs (or Hemdean) Bottom is protected as a Local Green Space, and is not an appropriate site for a school.
Victoria Blades	Other site	Why is the land on Green Road/Wokingham Road (tennis courts) not considered for dwellings, an ideal site, great transport links, a mosque was allocated the land over 10 years ago. Vacant site.	This land is required as part of the education uses on Crescent Road.
Cantay House Partnership	Other site	<p>In order to ensure the soundness of the plan, including all options for the delivery of residential development, the Land at Cantay Business Park site should be allocated for up to 20 residential dwellings to be delivered in the medium term.</p> <p>The site is currently in commercial use and is accessed via residential streets from Hardy Close. The site is relatively flat. The site is sustainably located within an established residential area.</p> <p>It is clear that Reading Borough has insufficient sites to be able to accommodate all of their housing needs and is reliant on neighbouring authorities to contribute to meeting their need through the duty to cooperate.</p>	<p>No change proposed.</p> <p>Cantay House has been considered through the HELAA, and was not considered suitable for allocation. The main issue affecting the land is flood risk, and technical work has been undertaken which shows that there would be no safe access to any development. This would require an</p>

		<p>Paragraph 4.3.5 of the emerging Local Plan makes it clear that RBC is in the fortunate position of over-providing in terms of employment land. The entire employment parcel at Cantay Business Park is being put forward as a residential allocation and the proposal would therefore enable a comprehensive approach to the re-development of this area.</p> <p>The site at Cantay Business Park would need to be subject to both a Sequential and Exceptions Test. Given that Reading cannot meet their housing needs, it is clear that there are no alternative sites (or at best insufficient alternatives) for residential development to be located and accommodate their full housing need. The assessment of the site would then fall to considering the wider sustainability benefits to the community of a residential use on the site through an Exceptions Test. Given the nature of the site, set within a quiet residential environment, the fact the land has already been developed, the focus on regeneration in addition to benefits that would apply more widely to other sites relating to the type of dwellings that would be provided and the sustainable nature of the location, it is clear that a strong case could be presented in terms of the wider sustainability benefits to the community in order that the site would pass the Exceptions Test.</p> <p>The detailed design of any residential development would ensure that the development would be made safe from flood risk. In terms of the wider area, the fact that the existing site is virtually entirely covered by buildings and hard standing means that any development is likely to be able to provide a betterment to the existing situation in terms of flood risk elsewhere, thus not only meeting but exceeding the requirements of paragraph 103 of the NPPF which refers to ensuring flood risk is not increased elsewhere.</p> <p>The promoters of this site would welcome the opportunity to engage with the Council and would be willing to provide additional technical reports to support the progression of this allocation.</p>	<p>evacuation plan, and with the nearest dry land in the event of a 1 in 100 year flood being some distance away, this would be difficult to achieve.</p>
Rebecca Chiazese	Other site	<p>I would like to bring to your attention the land to the rear of the western side of Clifton St, which is made up of semi-detached inter-war period houses. Up to 12 homes could be built along the back of Clifton St, currently in use as back gardens and garages. Whilst within the conservation area, this has not been appraised since 2004 and several new developments have taken place in this location including on Goldsmid Road and to the rear of the Oxford Road properties. The heritage merit is on the eastern side of the Clifton St. I believe that all of Goldsmid Road is within the Conservation area due to the location of the Synagogue on this road rather than the historic merit of the buildings, particularly those behind Clifton St. I would like to see the western side of Clifton St and the part of Goldsmid Rd behind it removed from the conservation area and the draft local plan to identify the site above as having housing potential.</p>	<p>The site fronting Goldsmid Road has been added to the Housing and Economic Land Availability Assessment. The HELAA considered that the site was not suitable for residential development, due to parking and residential amenity issues. As a result, it is not proposed to allocate it in the Local Plan.</p>
Gladman Developments	Other site	<p>Gladman wish to submit Land off Peppard Road, Emmer Green for consideration through the plan-making process. This site is located adjacent to the urban area of Reading, but is wholly</p>	<p>No change proposed.</p>

Ltd		<p>within South Oxfordshire District. It should be considered through the plan making process as a strategic growth location that relates to Reading. It therefore presents an opportunity to accommodate the unmet needs of Reading in a sustainable location alongside the administrative boundary of the Borough. Whilst it is not the role of the Reading Local Plan to allocate land outside of its administrative boundary, it would be appropriate to consider this site as a strategic location for meeting unmet housing needs in the same manner as proposals for Grazeley within the Wokingham and West Berkshire administrative areas.</p> <p>The site comprises 13.48 hectares adjacent to existing residential development at Emmer Green. Emmer Green has a good range of services and facilities which are within easy walking and cycling distance of the site including a primary school, secondary school, supermarket, newsagent, post office, pharmacy, playing fields and allotments. Emmer Green has excellent bus services to Reading, Caversham and Sonning Common which pass the site.</p> <p>The site comprises three fields currently in agricultural use. It is well contained within the landscape and important trees and other landscape features would be retained. The local highway network has capacity to accommodate the additional traffic associated with the development of the site without adverse impact. There is an existing public right of way that crosses the southern part of the site linking Peppard Road with Kiln Road which will be retained and enhanced.</p> <p>The site has a low ecological value and any loss of habitat would not be significant; mitigation and net biodiversity gains can be readily achieved. There are no designated heritage assets within or immediately adjacent to the site and its development would not adversely affect the setting of any listed building.</p> <p>The site has the capacity to accommodate approximately 245 dwellings. Gladman is committed to bringing forward the site for development at the earliest opportunity. The site is eminently capable of being fully developed in the early years of the Local Plan. A Development Framework is provided.</p>	<p>This land is not within Reading Borough, and it is not within the remit of the Local Plan to allocate it, particularly when it is not identified in the Final Publication South Oxfordshire Local Plan. A planning application on the site, to which the Council objected, was recently refused.</p> <p>The Council does not consider that the northern edge of Reading is the appropriate location to meet Reading's housing needs. Instead, it has agreed a Memorandum of Understanding with the Western Berkshire HMA authorities that seeks to deal with that unmet need.</p>
LaSalle Investment Management	Other site	<p>LaSalle consider the Site at 15-18 Friar Street, 2-16 Station Road and Harris Arcade should be identified within the Local Plan for future development.</p> <p>The Site comprises a mix of retail and main town centre uses, and adjoins the Station/River Major Opportunity Area, tall buildings cluster and the essential north-south link at Station Road. It is within the Business Improvement District, office core, central core, primary shopping area, designated primary frontage and area of archaeological potential. The site includes a listed building at 15 Friar Street, and 12, 13 and 14 Friar Street which sit adjacent to the Site are all listed.</p>	<p>Change proposed.</p> <p>This area has been added to the HELAA process. It is not considered that it is suitable for large scale redevelopment. Whilst only one building within the site is listed, the site nevertheless makes a significant positive contribution to the townscape</p>

		<p>The Site represents an opportunity for a phased redevelopment. Additional height bulk and mass across the site could be explored subject to good design and townscape consideration. It is considered that there is potential for at least, an extension into the service yard off Winston Terrace and for additional height, bulk and massing to the western part of the site. The Site represents an opportunity for redevelopment for a range of uses with active frontages on the ground floor and a mix of uses on the higher floors, including retail and main town centre uses, hotel uses, office use, student accommodation and residential use in accordance with town centre aspirations.</p> <p>It is suggested that Draft Local Plan policy CR11 is amended and an additional paragraph inserted as follows:</p> <p>“CR11j, Station Road and Friar Street</p> <p>There will be active retail and leisure uses on the ground floor along Friar Street and Station Road, with a mix of town centre uses on higher floors. Development should enhance linkages in a north-south direction to link to the Station Hill area. There is potential for increase height, bulk and massing across appropriate parts of the Site.</p> <p>Site Size: 0.34ha. Potential for development for a range of town centre uses scope for town centre uses (including retail and leisure), hotel and office uses, student and residential accommodation.”</p>	<p>and character of the centre, and the approach as proposed would therefore have a significant adverse effect on the town centre.</p> <p>Due to the strategic significance of the site and the fact that very little of it benefits from statutory protection, a new policy on the wider area (which also includes some properties not within this submission) should be inserted. This should identify the importance of the area and seek to retain its character. This does not mean that there will not be opportunities for development within the site, but wholesale redevelopment will not be supported.</p>
Lawrie Lee	Other site	<p>I own a 5 acre site which is "Land North of Gravel Hill" Emmer Green. Part of my site (is within RBC but the majority falls within SODC. SODC recently conducted a HELAA and the results have only just been made public. The HELAA rating for my site is suitable, available and achievable for housing.</p> <p>My site is currently private Equestrian use. It has highways access from Gravel Hill and unconditional Right of Way access granted and registered over Highdown Avenue. This could provide housing as an alternative in the adjacent area as a partial alternative to say Emmer Green Golf Club proposed development, so spreading and relieving traffic away from Kidmore End Road.</p> <p>According to NPPF and overarching approach to planning with co-operation between neighbouring Councils is required. Now that SODC HELAA has established the situation for my site, can this also be formally considered for development that would benefit both RBC and SODC housing numbers.</p>	<p>No change proposed.</p> <p>This land is not within Reading Borough (apart from a very small area), and it is not within the remit of the Local Plan to allocate it, particularly when it is not identified in the Final Publication South Oxfordshire Local Plan.</p> <p>The Council does not consider that the northern edge of Reading is the appropriate location to meet Reading's housing needs. Instead, it has agreed a Memorandum of Understanding with the Western Berkshire HMA authorities that seeks to deal with that unmet</p>

			need.
Bob O'Neill	Other site	It does not seem clear what you intend to permit on the Madjeski Stadium car park..... I would suggest that this should remain as parking and deny permission to take this land for development. Whether Cllr Page decides that he wants only his own buses bringing the fans to the matches, there might also be a need of space for coaches and service vehicles to park up during the matches. The argument over vehicle pollution and banning vehicles in Reading will reduce if electric etc vehicles become the norm and it will then be unacceptable to victimise private vehicles.	The application on this site was considered at Planning Applications Committee in April 2017, and it was resolved to grant permission subject to completion of a Section 106 agreement. Issues around this development were discussed at that meeting.
Bob O'Neill	Other site	Am I right in assuming that you now include Kings Meadow Pool as a site suitable for housing (ditto View Island and the Lock) development? I thought that it was a listed building for leisure! I knew you could not keep your hands off that park and the listed building.	It is not clear what this is a reference to. The Plan does not contain any proposal to use Kings Meadow Pool, Kings Meadow, View Island or Caversham Lock Island for housing.
Andrew Smith	Other site	<p>There is an identified shortfall of a minimum of 943 units over the plan period. The draft plan states that the reason this identified shortfall cannot be met is due to the fact that Reading's boundaries are constrained and that there is a heavy reliance on previously developed land, of which there are limited opportunities. However, land at 20-22 Richfield Avenue has not been identified for development, despite it having been submitted as part of the Call for Sites process.</p> <p>The land could be developed either solely as a residential development site, or as part of a mixed use development to retain the existing employment use of the land. This could easily be incorporated into any future scheme of the land with office accommodation forming either the ground floor of an apartment block, or be an independent unit in one corner of the land.</p> <p>In order to exceed the identified housing need, Reading will have to consider sites that it has previously discounted and I suggest that the land at 20-22 Richfield Avenue should be considered in such a context. Land at 28-30 Richfield Avenue (also in employment use) is identified for redevelopment for 50-80 dwellings, without providing any future employment use. Therefore, the land at 20-33 cannot be considered unsustainable, as it is located a few doors away from the proposed allocated site. By allocating further land at Richfield Avenue for development, even if it is identified for a mix of uses, it ensures that the identified housing need is delivered during the plan period.</p>	No change proposed. The site at 20-22 Richfield Avenue has been assessed within the Council's Housing and Economic Land Availability Assessment (HELAA) and was not considered suitable for residential development. The site is in employment use, and is surrounded by employment uses, and as such its development for residential was not considered appropriate.
Tarmac	Other site	<p>Tarmac own land in the South Reading area and within the administrative area of the adjoining West Berkshire District. None of the Tarmac land is currently proposed for built development in the emerging Local Plans of Reading or West Berkshire.</p> <p>However, the growth proposed in South Reading, together with adjacent areas of West Berkshire and Wokingham District is of a very significant scale, e.g. Grazeley, Island Road, Manor Farm</p>	No change proposed. The land owned by Tarmac within Reading Borough was considered as part of the HELAA process. Virtually all of it is within the functional floodplain, and it is not considered possible to allocate it for

		<p>Road and South of Elgar Road. This scale of potential growth will require supporting green infrastructure and surface water drainage infrastructure that is off-site and may impact/require the land in Tarmac ownership and other similar sites. The requirement for sites to perform these functions to facilitate and release major development is not in any way recognised or addressed. There should be a specific and clear reference to the infrastructure that may be needed in those areas which now have only environmental designations. In the future new flood alleviation methodologies may be devised that will render the sites suitable for built development. Tarmac wish to confirm that their landholdings are available for development in that context.</p>	<p>development. It is not agreed that the sites identified in South Reading will necessarily require off-site green infrastructure.</p>
<p>Trustees of the Phillimore Successors Settlement</p>	<p>Other site</p>	<p>We object to the omission of any discussion about the role that South Oxfordshire can and should play in meeting Reading's unmet housing need. The Draft Plan should be amended to offer support for an urban extension to Reading on our clients land at Playhatch, which could help to deliver a significant amount and type of housing in a highly sustainable location adjoining the Borough.</p> <p>The shortfall of nearly 1,000 dwellings will need to be accommodated within adjoining Boroughs, and preferably within the Western Housing Market Area (HMA) from which the need arises. The SHMA acknowledges that the Western HMA includes parts of South Oxfordshire District and that the influence of Reading, economically and in terms of local housing demand, extends into South Oxfordshire. Indeed, the Berkshire SHMA states that it is "important to recognise these relationships in duty to co-operate terms" (paragraph 10.9). This is acknowledged in paragraph 2.1.4 of the Duty to Co-operate Scoping Report and footnote 13 of the Local Plan. However, having acknowledged this fact, the Draft Plan then neglects any discussion of how any unmet need arising from South Oxfordshire within the HMA might be accommodated - in particular under the 'Provision of Housing' section. This is a serious and significant omission.</p> <p>Within the Draft Plan, the Spatial Strategy contains references (e.g. paragraphs 3.2.1 and 3.2.12) to urban extensions to the built up area of Reading, in terms of the role that these might play in delivering housing and the role of Reading Borough in providing such development with the necessary services and infrastructure. Whilst we recognise that it is not within the gift of the Reading Borough Local Plan to allocate sites outside the Borough to meet its housing need, we suggest that an appropriate response would be to lend support to development on our clients land at Playhatch - within South Oxfordshire District - such as the Plan does for strategic proposals at Grazeley.</p> <p>The Draft Local Plan proposes the provision of Park and Ride facilities along the A4155 corridor. It is therefore acknowledged as being one of the most sustainable locations in the Borough, and land adjoining the urban area at Playhatch is available for strategic growth. The edge of urban location of the site also provides the opportunity for delivering family homes - a type of housing for which the Draft Plan acknowledges a pressing need and admits that it will be difficult to</p>	<p>No change proposed.</p> <p>This land is not within Reading Borough, and it is not within the remit of the Local Plan to allocate it, particularly when it is not identified in the Final Publication South Oxfordshire Local Plan.</p> <p>The Council does not consider that the northern edge of Reading is the appropriate location to meet Reading's housing needs. Instead, it has agreed a Memorandum of Understanding with the Western Berkshire HMA authorities that seeks to deal with that unmet need.</p>

		deliver within the Borough (paragraph 3.1.4).	
Walsingham Planning	Other site	A client who owns 64 St Johns Road has asked that I bring it forward in the context of the current local plan consultation as a potential housing site.	No change proposed. The site has been added to the Housing and Economic Land Availability Assessment. The HELAA considered that the site was not suitable for residential development.
John Wilkins	Other site	I notice that Kennet Meadows are outside development areas which I strongly support.	Noted. No change needed.
Bob O'Neill	Proposals Map	The Arthur Legge Centre is shown on your maps. This has been disposed of and is no longer a public facility. Please remove this as it is misleading. RBC has been very short-sighted selling this site for high density housing.	The reference is made on the Ordnance Survey base map, which the Council cannot alter.
Bob O'Neill	Proposals Map	In the context of "parks" as green spaces, I think you mislead the reader. Acre Road Business centre is not really a "park" and your map might lead one to believe it is.	Acre Business Park is the official name of the facility, and cannot be arbitrarily changed on a map. In any case, the reference is made on the Ordnance Survey base map, which the Council cannot alter.
Bob O'Neill	Proposals Map	You show King's Meadow Baths boundary /Key frontage extending up to the river. I do not agree to Thames Lido getting rights to extend their area of influence up to and over the ditch - right up to the lock path. They are a private developer and this park is public and therefore should retain its tree screening from the riverside. Those London Plains were planted to give the screening in the first place.	The Proposals Map does not show any boundary for the Baths or a key frontage in this location. What is shown is the boundary of the Central Core.
Bob O'Neill	Proposals Map	The maroon dotted hatch shading on the Griffin Pub in Caversham does not show up on the Key Map Overview. I can't see it being a scheduled ancient monument!	This shading represents Conservation Areas, and appears on the key.
Tilehurst Poor's Land Charity	Proposals Map	The Woodland area of the site is proposed to be allocated as an Area of Identified Biodiversity Interest, which is referred to on the draft proposals map as Policy EN7, however a review of the draft Local Plan suggests the policy in relation to this allocation should be Policy EN12. Our clients would be very grateful for clarification on this point.	Agreed. This was an error, and the reference should be changed to EN12.
University of Reading	Proposals Map	The Proposals Map includes areas categorised as areas of biodiversity and green network importance. These areas match with areas of deciduous woodland as recorded within the National Forest Inventory 2014. The Proposals Map, within the key, references these areas an "Area of identified biodiversity interest" and further includes green links as "Existing or proposed Green Link", directing to Policy EN7 of the Draft Plan as the relevant policy for reference. This is incorrect. Both items, mentioned above with reference to the key, reflecting what is shown on the Proposals Map, should make reference to draft Policy EN12.	Agreed. This was an error, and the reference should be changed to EN12.
University of Reading	Proposals Map	The area categorised as important in terms of its biodiversity importance (deciduous woodland) is not fully up-to-date. An area of the categorised area is directly adjacent to the Mackinder halls	No change needed. We have reviewed the areas shown on the Proposals Map,

		<p>development at the Whiteknights Campus and therefore includes an area where deciduous woodland habitat of value is not present. This would require a minor reduction in the area considered to be an “area of identified biodiversity interest” on the draft Proposals Map.</p> <p>It is noted that a further area categorised as an “area of identified biodiversity interest” has been included within the draft Proposals Map which was not previously included within the SDPD. This can be found to the east of the Mackinder halls development and east of the small area discussed above which we recommend is removed. The University holds concern regarding the inclusion of this additional area and without evidence supporting this change would be concerned that it would not be justified and therefore in accordance with the NPPF at paragraph 182.</p>	<p>and it appears that all of those areas adjacent to the Mackinder Halls are still covered in deciduous trees. The area to the east of Mackinder Halls is also clearly deciduous woodland, which qualifies as an area of BAP habitat.</p>
The Englefield Estate	Sustainability Appraisal	<p>We support the finding of the SA where it concludes that allocation of land at Grazeley would bring the most positive sustainability effects. In particular, given the scale of housing growth that the site could deliver, it would have a major positive effect on Objective 13. We are therefore not clear why the Policy has been scored with a ‘?’ against this objective, as well as a tick. Further, what appears to be unacknowledged in the SA testing is that the Policy would also have positive sustainability effects in terms of Objectives 14 and 15 and on this basis amendments should be made to the SA.</p>	<p>Agree. Change proposed.</p>
Environment Agency	Sustainability Appraisal	<p>The Sustainability Appraisal refers to ‘high flood risk’ without defining what high flood risk means. It mentions that this policy needs re-wording. It mentions changing the policy to allow for the exception test to be passed but says this will be for sites with a lesser flood risk. Again ‘high’ and ‘lesser’ needs to be defined as it still seems to say that there will be no development in Flood Zone 3a. This will need to be amended in order for your local plan to be national planning policy compliant.</p>	<p>Agree. Policy EN17 should be re-worded to reflect the current national policy approach.</p>
Gladman Developments Ltd	Sustainability Appraisal	<p>The Council should ensure that the results of the SA process clearly justify the policy choices made within the Local Plan. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected.</p> <p>In this regard, Gladman would wish to highlight our concerns that the emerging SA does not test all reasonable alternatives for the identification of development opportunities to support the delivery of its development needs in full. At present, the SA tests a development opportunity outside of Reading Borough at Grazeley, but fails to test other reasonable alternatives that are adjacent to the urban area but outside of the administrative boundary. In this regard, Gladman would highlight the need to assess a policy approach for the identification of development opportunities on the urban edge of Reading within all boroughs that border its urban area, fully recognising those parts of South Oxfordshire District that functionally form part of the Western Berkshire Housing Market Area, including land off Peppard Road at Emmer Green.</p>	<p>The Sustainability Appraisal now looks at strategic growth options on the edge of Reading as a context to understand the sustainability implications. However, since it is not within the gift of the Local Plan to identify urban extensions in any of these areas due to their location in adjoining authorities, this is for context only.</p>
Natural England	Sustainability Appraisal	<p>In our review of Reading Borough Local Plan SEA we agree with the conclusions drawn.</p>	<p>Noted. No change needed.</p>

Natural England	Sustainability Appraisal	Matrix of Key Sustainability Effects: EN7: Local green space and Public Open Space, EN8: Undesignated open space, EN9: Provision of new open space - Green open space has the potential to contribute to the environmental Sustainability Objectives. Ticks should be added as appropriate in boxes 1-10, especially box 7	No change proposed. The Matrix of Key Sustainability Effects only notes <i>significant</i> positive or negative effects. Policies EN7-EN9 will bring positive environmental effects, but ultimately significance of these effects is dependent on design.
Natural England	Sustainability Appraisal	Matrix of Key Sustainability Effects: CR14h - Just checking but I can't see why this would have a negative impacts on "Adapt to inevitable climate change in terms of preparedness for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage".	The site is partially located in Flood Zone 2.
Natural England	Sustainability Appraisal	Matrix of Key Sustainability Effects: EN5 - Should this have box 9 ticked?	The Matrix of Key Sustainability Effects only notes <i>significant</i> positive or negative effects. Policy EN5 will bring positive landscape/townscape effects, but ultimately significance of these effects is uncertain. The policy is somewhat limited in that it only identifies 9 views within the Borough.
Trustees of the Phillimore Successors Settlement	Sustainability Appraisal	The SA makes no assessment at all of the sustainability merits of identifying land adjoining the urban area and within South Oxfordshire District for strategic development. In contrast, the SA tests proposals for strategic development at Grazeley (Policy SR4(f)) - which is also outside the Borough boundary - and finds that it would be the most sustainable option "because it brings the most positive sustainability benefits". Similarly, we contend that if the SA were to test, as an alternative policy approach, the sustainability effects of strategic development within South Oxfordshire at Playhatch it would conclude that any such policy: - Would bring very positive effects with regard to Objective 13 - Would bring positive sustainability effects in terms of Objective 14; and - Would bring very positive effects in terms of Objective 15. On this basis, the SA would conclude, as it rightly has with respect to development proposals at Grazeley, that the allocation of land on the edge of the Borough within South Oxfordshire District would be the most sustainable approach. Therefore, the SA should be amended to include assessment of a policy approach for development on the urban edge of Reading within adjoining Boroughs, in particular at Playhatch where at present the needs of South Oxfordshire (which forms part of the HMA) are not provided for, nor any provision made for meeting any of Reading's unmet housing needs.	The Sustainability Appraisal now looks at strategic growth options on the edge of Reading as a context to understand the sustainability implications. However, since it is not within the gift of the Local Plan to identify urban extensions in any of these areas due to their location in adjoining authorities, this is for context only.
University of Reading	Sustainability Appraisal	The University supports the conclusion of the SA for ER1c, however, given the significant housing need and shortfall of planned housing marginally below 1,000 dwellings over the Plan period, we would recommend that the number of dwellings on the site could be higher than 12 - 18 and that	Do not agree. It is considered that the plan can only justify the dwelling range specified, and any additional

		20 dwellings may be possible subject to a suitable layout and design.	homes would need to be justified through an application.
University of Reading	Sustainability Appraisal	<p>Whilst the University supports the principle of the SA in its appraisal of the site as a suitable draft allocation, we would recommend that option (3) is given further consideration in light of the significant housing shortfall included within the Draft Plan. A greater proportion of the site can be developed, subject to technical work appraising the ability to mitigate any potential negative impacts on flood risk on neighbouring properties and/or land, and the potential for adverse impact by virtue of flood risk on proposed dwellings.</p> <p>The ability for an increased housing number on the site arises from an opportunity to redevelop the old boathouse (used for storage) and/or the current boathouse, subject to the replacement of the facility elsewhere, and/or increasing the density of housing on the site. Policy wording could be flexible to the extent of allowing the development of the greater proportion of the site subject to the relocation of the Boat Club to an alternative suitable and accessible site.</p>	Do not agree. It is considered that the plan can only justify the dwelling range specified, and any additional homes would need to be justified through an application.
Bob O'Neill	Infrastructure Delivery Plan	Where I criticised at the last Inspection of the plan the adequacy of utility provision and you referenced a consultation with Thames Water etc, I think in retrospect you should have been more distrusting of a private utility company. In the interim period TW have been shown to be incompetent and have been fined for discharging raw sewage. They cannot be trusted 100%. We have been lucky that there has not been a drought like in 1977. I can't imagine the blame that RBC would face if we found that there was a full summer and no water. TW would escape and say that it was an exception, but we can't plan to accept such a scenario. There is certainly a difference between supply to a mixed area of industrial/commercial and housing, than to an area of just high density housing. Industrial supply can be rationed but housing needs can't.	No change proposed. Thames Water is the only provider in the area and is regulated by OFWAT. Water utility provision in this area is the responsibility of Thames Water and RBC has no control over this fact.
Thames Valley Police	Infrastructure Delivery Plan	Suggested change (p37): "The Thames Valley Police (TVP) Policing and Crime Plan50 identifies strategic objectives."	Agreed. The Infrastructure Delivery Plan will be changed to reflect this.
Thames Valley Police	Infrastructure Delivery Plan	Suggested change (p38): "South • A new police facility to replace the current Reading Police Station - There is a preference to establish a new facility within south Reading. This would replace the current Reading Police Station, relocating the majority of staff and departments to the new facility, aside from the local teams that serve the town centre itself."	Agreed. The Infrastructure Delivery Plan will be changed to reflect this.
Thames Valley Police	Infrastructure Delivery Plan	Suggested change (p38): "Central and West • A local town centre facility to retain TVP's presence in Reading Town Centre, including locating the existing town centre teams here. A number of smaller, one to two room touchdown facilities, linked to new growth where appropriate, typically these could be provided as part of, or within, existing or new community facilities. Indicative costs for such facilities will be provided by TVP. These will feed into further future	Agreed. The Infrastructure Delivery Plan will be changed to reflect this.

		work.”	
Thames Valley Police	Infrastructure Delivery Plan	<p>Suggested change (p38): “Borough wide Contributions towards a roll out of new Automatic Number Plate Recognition (ANPR) Cameras within Reading, particularly located around the strategic road network and in locations with increased activity linked to new development and growth.</p> <p>Contributions towards Police Infrastructure to increase opportunities for “Digital Policing”, thus increasing the visibility, mobility and effectiveness of TVP to police local neighbourhoods.”</p>	Agreed. The Infrastructure Delivery Plan will be changed to reflect this.
Thames Valley Police	Infrastructure Delivery Plan	<p>Suggested change (p54):</p> <p>“Scheme: Police Infrastructure to deliver Digital Policing</p> <p>Need for Scheme:</p> <ul style="list-style-type: none"> • Make communities safer • Increase public confidence • Reduce costs by improving efficiency • Improve service delivery • Improve outcomes for victims of crime <p>Scheme Requirements: The Digital Policing Programme is delivering several projects to enable TVP to realise the benefits outlined above, these include:</p> <ul style="list-style-type: none"> • Smartphones • Tablets • Body-Worn Video • Vehicle Wifi • New capabilities <p>Capital Cost and Funding: TBC</p> <p>Timescales (where known): Ongoing</p> <p>Lead Delivery agency: TVP”</p>	Agreed. The Infrastructure Delivery Plan will be changed to reflect this.
Thames Valley	Infrastructure	Suggested change (p54):	Agreed. The Infrastructure Delivery

Police	Delivery Plan	<p>"Scheme: ANPR Cameras</p> <p>Need for Scheme: To aide in the prevention and investigation of crime within the Borough.</p> <p>Scheme Requirements: Enhanced and new cameras in strategic locations within the Borough</p> <p>Capital Cost and Funding: Circa £11,000 per camera</p> <p>Timescales (where known): Ongoing</p> <p>Lead Delivery agency: TVP"</p>	Plan will be changed to reflect this.
Bob O'Neill	Housing and Economic Land Availability Assessment	<p>A floorspace need for leisure is not identified. I fail to understand this bit of logic. You are in need of allocation of space for new swimming pools in Reading. I assume you will be handing this land over to a third party to build and manage. This is very much ground space. You have also talked about third parties setting up other forms of outdoor leisure. With every large scale development one might suggest there is a community hall or play area -surely that is classed as leisure.... I think developers would be quite happy to leave postage stamp sized allocations. It is then up to RBC to insist on ample area -fit for purpose and duly proportional to population size. So I don't think you can be so dismissive in this.</p> <p>I wonder if you have a different view on what leisure is - classifying hotels as leisure!!!???</p>	<p>The HELAA is not dismissive on leisure - leisure allocations, including for swimming pools are made in the local plan - but the needs are qualitative not quantitative, and therefore the HELAA is not the appropriate vehicle for considering it.</p> <p>The HELAA has hotels and leisure as separate classifications.</p>
Bob O'Neill	Housing and Economic Land Availability Assessment	<p>I think you should protect 100% the designated open space and take the hard decision to buy back housing land if it is found that an infrastructure site (such as a school/doctors surgery/police station etc) suddenly becomes needed. -and not to dip into parks /recs with the excuse that it is brought about by "exceptional circumstances". This is rather than leaving future generations with less green open space. The last time that exceptional circumstances happened was during the war and in most cases it reverted to public space after. Once the precedence is set future councils may more readily classify all sorts of needs to be " "exceptional circumstances" and parks may be lost forever. A point in case: I don't think you should break the Trust at Mapledurham Playing Fields because it goes one against open space leisure area policy and two it breaks a moral code (covenant) mentioned in 3.22.</p>	<p>No change proposed. The specifically designated open space in EN7 does not refer to exceptional circumstances for its loss. This also applies to Mapledurham Playing Fields.</p>
Bob O'Neill	Housing and	<p>I think you should also rule out land that is going to be impacted by the railway (ref. 2.16) With</p>	<p>No change proposed. With the high</p>

	Economic Land Availability Assessment	the disturbances caused by the Cow Lane train washing sheds and the likely increase in heavy rail transport, it would be madness to encourage new accommodation too close to this.	levels of need for new development, land close to the railway cannot be ruled out. There have been recent developments and permissions close to the railway, and this is expected to continue.
Bob O'Neill	Housing and Economic Land Availability Assessment	I think you wrongly assess exclusion zones in the flood plain. Mill Green flooded badly and always floods. Thames side promenade also floods and acts as an absorption zone for heavy rain. This also includes Rivermead - that is why it is called River mead. It is not acceptable to make exemptions because RBC and Greenwich have run out of dry land to permit building extensions to that Leisure centre. The Central Pool site has adequate land to build a superb new pool without compromising Rivermead open space. The sale of this site is developer and council greed; purely and simply. You should earmark and protect our leisure with more importance than to selling to prospective developers.	This is informed by the Council's Strategic Flood Risk Assessment.
Bob O'Neill	Housing and Economic Land Availability Assessment	5.12 the word is "close" not "cose"	Noted. The wording is changed.
Bob O'Neill	Housing and Economic Land Availability Assessment	I very much agree with you identifying a max limit. I am sure we need to see and guard against where the quality of life becomes greatly reduced. This is not Hong Kong and I hope we won't feel obliged to copy.	Noted. No change proposed.
Bob O'Neill	Housing and Economic Land Availability Assessment	I think it is very important for a having a happy community that leisure space is assessed in Table 13. Austerity and cuts will not go for ever and Reading has cut leisure hard.	The HELAA is not dismissive on leisure - leisure allocations, including for swimming pools are made in the local plan - but the needs are qualitative not quantitative, and therefore the HELAA is not the appropriate vehicle for considering it.
Ian Campbell	Responses to Issues and Options Representations	General comments - the Council says it does not consider government intervention is needed to provide the necessary new housing because the Western Berkshire Housing Market Area four authorities are making good progress. Given that house prices are no longer affordable for the majority of first time buyers on average incomes, when will Reading Council decide to grasp the housing nettle? In reality in the short term it is substantially dependant upon its neighbours. In the long term it is totally dependant on their land. Using procedural justifications for not taking the lead is an abdication of its key role. The spirit of the 8th June 2017 general election decision is that both main parties agree we need far more houses. How will Reading respond to this important change?	The response was that Government intervention is not required to ensure that the Western Berkshire HMA meets its needs. This is something to which the four authorities are committed.

Ian Campbell	Responses to Issues and Options Representations	Question 2 - The sensible point is made that the Local Plan must strike a balance between long term, consistent planning and what it is possible to foresee and plan for. It goes on to add that the actual mechanics of planning beyond 2036 mean the plan would need to be so flexible that it would become meaningless. I disagree. This attitude is allowing process to dictate policy. In the 1968 report it was not difficult to identify the growth areas of the southeast by superimposing maps of change one on another, each identifying potential change, scale, timing, location, infrastructure etc. The same could be done today looking ahead two generations. The hot spots soon emerge through similar analysis.	The Council stands by the original response, and does not consider that it equates to allowing process to dictate policy. The Council is signed up to a West of Berkshire Spatial Planning Framework that seeks to identify those growth areas, some of which are likely to be delivered into the years beyond 2036. It is this kind of document, not the Local Plan, that is the appropriate approach.
Ian Campbell	Responses to Issues and Options Representations	Question 14 - The Council response notes that several issues in this comment are important but seems reluctant to face the essential dilemma, can its newest Local Plan provide the housing needed on a sustainable basis within the existing broken system? What is the Council's answer? If Reading Council's new Local Plan can return house price ratios to normal levels that is fine. I do not think this plan will achieve a fair equilibrium. If not, who will not take the lead if Reading Council will not? The government transferred responsibility for housing supply to local authorities after the 2010 election. It is now, I suggest, incumbent upon Reading to face this new responsibility with, or without, the support of its neighbouring authorities. Sitting upon the fence, citing procedural difficulties is not sufficient. Nor is it sound.	The Local Plan does not set out to return house prices to 'normal' levels. The implication seems to be that this is wholly within the ability of planning to control. It is not. The plan sets out to provide the housing needed, and does so insofar as is possible. The plan does not sit on the fence at all - it seeks to provide as much housing as possible within its boundaries, and seeks agreement on meeting its unmet need.

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