

**READING BOROUGH LOCAL
PLAN PARTIAL UPDATE
CONSULTATION ON SCOPE AND
CONTENT**

STATEMENT OF CONSULTATION

November 2024

Contents

Contents	2
1. Introduction	3
2. Details of Consultation	4
3. Results of Consultation: Drop-in Events and Online Webinar	8
4. Results of Consultation: Written Responses	9
5. Evaluation of Consultation	11
Appendix 1: List of Those Consulted on Scope and Content	12
Appendix 2: Consultation Email Text	28
Appendix 3: Summary Leaflet	29
Appendix 4: Council’s Press Release	30
Appendix 5: Press Articles	33
Appendix 6: Link to Reg 18 Explainer Video	34
Appendix 7: Link to Reg 18 Webinar Recording	35
Appendix 8: Exhibition Boards for Drop-In Events	36
Appendix 9: Social Media Assets	40
Appendix 10: Selection of Social Media Posts	41
Appendix 11: Online Webinar poll results and Q&A	42
Appendix 12: Consultation Responses	45
Appendix 13: Summary of responses to social media promotion	338

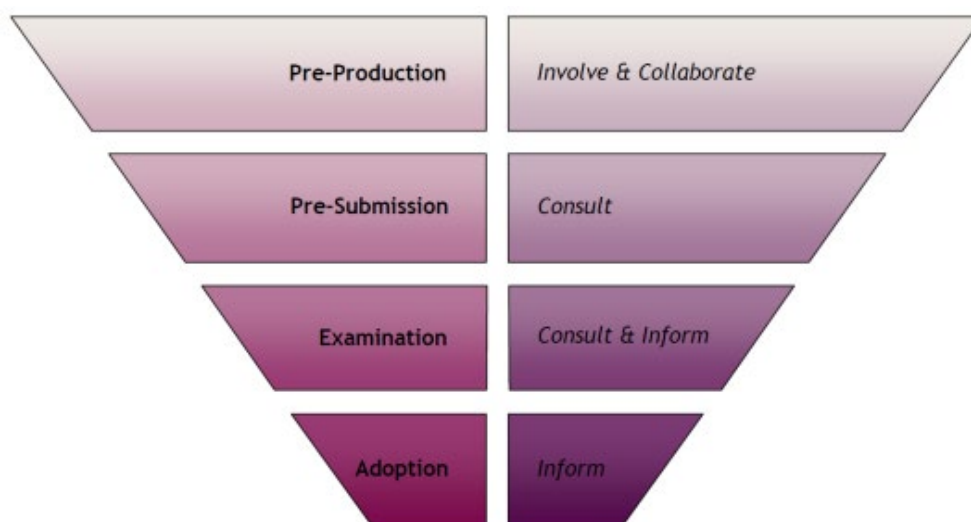
1. Introduction

- 1.1. The Regulation 18 consultation that took place between November 2023 and January 2024 related to the Local Plan Partial Update (LPPU) for Reading. It was decided to proceed with a Partial Update following the Local Plan Review (published in March 2023) which identified the need to update 45 of the 90 policies in the plan. Updates for certain policies were required for a variety of reasons, including new national policy and legislation, changes in circumstances and monitoring of the effectiveness of policies.
- 1.2. The first and only consultation stage to date was on Scope and Content. This document described the approach that will be taken to updating each policy but did not contain a draft update (which will be a matter for the next consultation). The Scope and Content document was informed by the Council's own evidence to understand what the need for homes would be using alternative methodology. Although the final results of this are yet to be published, initial results were used to identify what the level of housing need would be for Reading over the plan period. The Scope and Content also identified all sites that had been put forward for inclusion in the draft plan. Supporting documents such as the Infrastructure Delivery Plan and the Sustainability Appraisal were also made available for comment.
- 1.3. The Strategic Environment, Planning and Transport Committee approved the Scope and Content for consultation on 15th November 2023 and it was published on 27th November 2023 alongside supporting documents mentioned above. The Consultation ran until 5pm on 31st January 2024.
- 1.4. The next stage will be to produce a Pre-Submission Draft Local Plan that will be subject to another consultation starting in November 2024. It is expected that the submission, examination and adoption will occur from early 2025.

2. Details of Consultation

- 2.1 Consultation on the Scope and Content begun on Monday 27th November 2023 and lasted until 31st January 2024 at 5pm, a period of just over 9 weeks. The Sustainability Appraisal and Infrastructure Delivery Plan were also made available online for public consultation during this period.
- 2.2 In terms of an approach, the consultation on planning policy documents need to be undertaken in line with the Council's adopted Statement of Community Involvement (SCI). The latest version of Readings 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 Regulation 18 stage, which include:
- Interactive workshops;
 - Questionnaires;
 - Leaflet drops across a defined area;
 - Exhibitions, particularly in locations and at times which would maximise the number of people not previously involved in planning matters attending, e.g. shopping centres;
 - Online resources, including interactive webpages or questionnaires;
 - Forum discussions, which could include specific groups such as developer/landowner forums.

2.5 It is considered that the overall approach taken generally reflects what is set out within the SCI.

2.6 The consultation consisted of the following elements:

- Directly emailing over 1,522 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.
- A summary leaflet was produced, printed and distributed. The contents of the leaflet can be found at Appendix 3. Copies were made available to local cafes and community spaces such as Reading Town Hall, Reading Biscuit Factory and RISC Global Café. Copies were also issued to RBC’s internal Neighbourhood Initiatives Team who distributed these to local community centres.
- Documents (including the Local Plan Partial Update, Sustainability Appraisal and Infrastructure Delivery Plan) were made available on the Council’s website;
- Physical copies of the summary leaflet and the Draft Local Plan were made available at Reading Borough Council local libraries;
- An online video was created explaining the Local Plan process and made available on YouTube and the Council’s website;
- Social media assets were created and posted to online platforms such as Facebook, LinkedIn, Nextdoor and X (formerly Twitter) via RBC’s main social media account. Table 1 shows the comms plan which includes dates the consultation was promoted on social media, as well as the platform and general content contained within the post. Table 2 provides details on the engagement for each post on X, LinkedIn and Facebook. For a summary of the comments received in response to these posts, please see Appendix 14.
 - Two targeted ads were paid for on Facebook between 1-7th December 2023 and 8-11th December 2023. The Reach for the targeted ads was as follows:
 - 1st targeted ad posted between 30th November – 7th December reached 5,520 with 136 engagements.
 - 2nd targeted ad boosted between 8-11th December reached 6,430 accounts with 123 engagements.
- A press release was prepared and distributed (see Appendix 4). From this, articles on the Local Plan appeared in the local press (see Appendix 5),
- Two drop-in events, where members of the Planning team were on hand to discuss issues arising together with exhibition boards (see Appendix 8), leaflets and copies of the Scope and Content document was held at Reading

Civic Offices on Thursday 7th December 2023 between 1-6pm and 11th December 2023 between 2-7pm; and

- An online webinar took place via Microsoft Teams on 13th December 2023 between 6-7pm, where Planning Policy officers gave a presentation on the Local Plan Partial Update and were available to answer any questions the attendees had. A recording of this was made available afterwards and subsequently uploaded to YouTube and the Council's website. Appendix 7 contains a link to the recorded session on YouTube, and Appendix 11 has the results of the Webinar poll as well as the Q&A discussion.

Table 1: RBC Comms Plan

DATE	EVENT	COMMS
27 Nov	Launch of consultation	<ul style="list-style-type: none"> • Web page live • Press release • Social media – X, FB, LinkedIn & Nextdoor
30 Nov	Drop-in cons & online webinar	<ul style="list-style-type: none"> • Resident's newsletter
4 Dec	7 Dec: Drop-in session, Civic Offices, 1-6pm 11 Dec: Drop-in session, Civic Offices, 2-7pm 13 Dec: Online webinar, 6pm	<ul style="list-style-type: none"> • Social media – X, FB, LinkedIn & Nextdoor
7 Dec	7 Dec: Drop-in session, Civic Offices, 1-6pm	<ul style="list-style-type: none"> • X
8 Dec	11 Dec: Drop-in session, Civic Offices, 2-7pm 13 Dec: Online webinar	<ul style="list-style-type: none"> • Socials – FB, LinkedIn, Nextdoor
11 Dec	11 Dec: Drop-in session	<ul style="list-style-type: none"> • X, FB & LinkedIn
5 Jan	Consultation reminder	<ul style="list-style-type: none"> • Social media – FB, X, LinkedIn, Nextdoor
15 Jan	Consultation reminder	<ul style="list-style-type: none"> • Social media – X, FB, LinkedIn, Nextdoor
26 Jan	Consultation deadline reminder	<ul style="list-style-type: none"> • Social media as above

Table 2: Engagement information for posts on X, LinkedIn and Facebook

Date	X	LinkedIn	Facebook
27 Nov	26 clicks 4 shares 2 likes 2 comments	22 clicks 1 share 6 likes 415 reach	7 clicks 3 shares 2 likes 1 comment 674 reach
30 Nov	5 clicks 5 shares 3 likes	3 clicks 5 likes 237 reach	1 clicks 336 reach
5 Dec	3 clicks 1 share 1 like	1 share 1 like 159 reach	3 clicks 2 shares 1 likes 822 reach
7 Dec	4 clicks 1 share	N/A	N/A
8 Dec	N/A	N/A	20 likes 1018 reach 7 comments
11 Dec	6 clicks 1 share 2 likes	1 click 1 share 4 likes 319 reach	5 clicks 1 like 1 comment 567 reach
4 Jan	10 clicks 2 shares 1 like 1 comment	3 clicks 2 likes 137 reach	9 clicks 2 shares 906 reach
17 Jan	5 clicks 4 shares	3 clicks 3 likes 150 reach	6 clicks 4 shares 1 like 697 reach
26 Jan	8 clicks 2 shares	3 likes 193 reach	11 clicks 1 share 2 likes 1 comment 852 reach

3. Results of Consultation: Drop-in Events and Online Webinar

- 3.1. The two drop-in events were not particularly well-attended, perhaps reflecting the continued reliance on accessing information online, in addition to the planned online webinar. However, the low number of attendees in person allowed for in-depth discussions on specific sites that were included within the Scope and Content document.
- 3.2. The online webinar was fairly well-attended, with 14 persons present. It provided an opportunity for 3 RBC Officers to provide detail on specific topic areas such as Housing, Biodiversity, Sustainability, Leisure, Retail and Culture, Infrastructure and Development Sites. In addition, officers were able to engage with the audience via the poll function on Microsoft Teams, where specific topic-related multiple-choice questions were asked, enabling attendees to share their views on the proposed updates. Time was also allocated for questions, and a number of attendees submitted individual questions on the Local Plan Partial Update via the chat function which Officer's responded to verbally. The Webinar was recorded and subsequently uploaded onto YouTube and RBC's Local Plan Update webpage. As of 08/02/2024, the recording has 90 views, suggesting that a wider number of people watched the playback recording. See Appendix 7 for the webinar recording and Appendix 11 for the results of the polls used during the session and the Q&A discussion.

4. Results of Consultation: Written Responses

- 4.1. The Council received 159 comments from different individuals and groups in response to the Scope and Content consultation. The format in which the responses were submitted comprised the following:
- 63 persons completed the online questionnaire;
 - 97 comments were received via email; and
 - 2 comments were received in the post.
- 4.2. The responses came from a number of individuals (such as local residents), statutory consultees, planning agents (on behalf of landowners), local groups and organisations, community associations, the NHS, and more.
- 4.3. Some of the main points are set out below (please note this list is not exhaustive):
- Requests to extend the plan period so that there is an additional 1- or 2-year buffer period. This is on the basis that the Council is required to have a plan period that looks ahead for at least 15 years post adoption, which may be difficult if there are delays upon submission to PINS.
 - A number of comments were made in relation to CC2 (Sustainable Design and Construction) and H5 (Standards for New Housing), noting that the policy requirements should be in line with the National Planning Policy Framework (NPPF) (2023), ensuring that there is no duplication with building regulation requirements. In addition, it was noted that the policies should adhere to the contents of the Written Ministerial Statement (December 2023), which set out that policies proposing local efficiency targets should be rejected at examination if they do not have a well-reasoned and robustly costed rationale.
 - A number of representations (over 60) were submitted in support of designating the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) (Policy EN7) as a Local Green Space and in favour of preventing housing development from coming forward. Comments were received from a number of individuals, as well as Natural England; Binfield Badger Group; Keep Kentwood Green; Tilehurst Allotment Society; CPRE; Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust; and The Woodland Trust.
 - Requests from landowners to avoid increasing the tree canopy cover to 25% given the predominantly urban nature of the borough (Policy EN14)
 - Preference from many planning agents/landowners to adopt the standard methodology including the 35% uplift (Policy H1), i.e., a target of 877 dwellings per annum, as set out within the NPPF (December 2023) and in light of the ongoing housing crisis. Furthermore, comments were made in relation to density (Policy H2), advocating for higher standards. Similarly, a number of landowners sought for a review of RBC's Tall Buildings Policy (CR10).
 - Concern from planning agents/landowners regarding the proposed increase in family housing, particularly within the town centre (Policy H2). Suggestions that this may result in poor quality housing or undermine the viability of a given development. In addition, there were objections in relation to the incorporation of

the First Homes scheme (Policy H3) as this may displace other forms of affordable tenures.

- General support from individuals and planning agents/landowners in relation to the introduction of a new co-living policy, albeit with requests to ensure flexibility within the policy requirements.
- Objections from SODC & VOWH regarding the inclusion of a new Caversham orbital road with a River Thames bridge crossing.
- AWE & MOD have stated that there is a risk that the Off-site Emergency Plan cannot accommodate additional housing or other developments within the extended DEPZ given the amount of pressure that this plan is under, as informed by recent test exercises. Therefore, a more precautionary approach is put forward. Requests were submitted to policy-rewording for OU2 that ensure the Local Plan does not allocate land for housing or other uses which increase the risk of the population within the DEPZ. Further discussion requested between RBC and AWE/MOD regarding extant permissions (e.g., allocation SR1).

4.4. A summary of each individual representation is included in Appendix 12 to this document.

5. Evaluation of Consultation

- 5.1. Generally, the approach to the consultation on the Scope and Content was reasonably productive in view of the resource constraints for carrying out such a consultation, particularly in terms of officer time. Given that the consultation was in relation to a Partial Review only, rather than a full update of each policy contained within the existing Local Plan, the number of responses received is considered to be adequate.
- 5.2. Attendance at the drop-in events was low compared to previous years. This is likely to be a result of more people accessing information on the internet, as well as the convenience of attending (or watching the recording of) the online webinar that was set up by RBC officers during the period of public consultation. 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 to ensure our approach is equitable.

Appendix 1: List of Those Consulted on Scope and Content

Active Travel England	Rentplus
Anna and John Beasley	Paul Allcock
Andrew Scott	Mr Allen Sinclair
The Launchbury family	BDO LLP
Daniel and Gilbert/Weldale Caversham Ltd	A MacGregor
Mrs Ann Davis	Alistair Lucocq
Pangbourne Beaver Investments	Mr Alok Sharma MP
Adam Masters	Alan Penton
Mr Aaron Collett	Royal Mail Group Ltd
Caldecotte Consultants	Oxfordshire County Council
Julia Abbott	Mrs Anna Ellis
Angela Castleton	AK Dave
Briony And David Downey	Amir Laghaei
Adam Boulding	Reside Developments
Adam Conchie	Amy Hambleton
Hives Architects LLP	Andrea Grashoff
Rowberry Morris	Andrew Crabtree
Tew Design	Andrew Edwardson
Woodley Town Council	Andrew Matthew
Earley Town Council	Wargrave Design Consultancy Ltd
Mr Adrian Windisch	Mr Andrew Clayfield
Dr Adrian Tompkins	Mr & Mrs Cooper
Adrian Clarke	Andrew Tudor
Andrea Warner	Mr Andrew Somerville
Anna Gargan	Parks Operational Level 1
Mapletree Investments Pte	Mr Andrew Laylry
Mr Alan Hardwick (rg+p Ltd)	Academy Windows
Civic Aviation Authority	Oakleaf Building Surveyors Ltd
Tahira Kulsoom	Oak Leaf Surveyors
Moorgarth	Andrew Cresswell
Inception Reading Sarl (C/o Moorgarth Group Ltd)	Andrew Taylor
Alan Wells	Angela Macdonald
Mr Alan Rutter	Angela Wright
Alan Green	Anita Soulsby
Mr Alan Beardmore	Mr Paul Morris
Alan & Pat McMahon	Ann Wells
Alex Hill	Ann Roughan
Alexandra Hemming	Anna Tomkins
Alison Hicks	Mrs Ann Briers
Amy Ireson	Thames Valley Police - Crime Prevention Team
Chiltern District Council	Anne Davis
Alison Bond	Anne Pink
Alistair Appleton	Mrs Anne Atkinson
Alison McNamara	Annette Jukes
	Annie Gedye

Ann Morrow
Anonymous
Anthony Reeve
Dr Antony Cowling
Tim Cowling
Greater Reading Environment Network
Mr Alan Overton
Patricia Appleton
Tricia Appleton
B Caulfield-James
Janice and Tony Walker
ADS
Richard Fenn Designs Limited
Mr Barras
Maria Theresa Molner
Art R Miller
Asha Tanna
Ann Jenkin
Ashleigh MacFarlane
Ashley Pearce
International Sign Association UK
Andrea Sharpe
Jackie Astley
Jim Dunkley and Susie Downer
Department for Transport
Ann Ayres
Andrew Ballsdon
Barbara Goodbun
Barabara Harding
Barbara Garden
Fiona Kavanagh
Jon Barber
Scott Versace
Richard and Linda Beakhouse
Rebecca Curtayne
Eileen Willans
Ben Burfoot
Benjamin Dakin (ROK Planning)
Ben Neo
Ben Stanesby
Foudry Properties
Ben Pattinson
Reading Civic Society
Richard Bennett
Risc Café
Berkshire Gardens Trust
Bernard and Haydee Hagger

Ms Beth Scott
Mr B Garvie
Mr Biddle
W Treadwell
Rob Bishop
Redlands GLOBE
Tilehurst GLOBE
Southcote GLOBE
Caversham GLOBE
Newtown GLOBE
Battle GLOBE
Caversham GLOBE
Carol Morton
Jacobs Babtie Public Service Division
Bob Tarling
Robert Ayres
Rob White
Bobby Blanc
Buckinghamshire, Oxfordshire and Berkshire
West (BOB), Integrated Care System
Rlwconsultancy
Robert and Debra Wheeler
Eric Bowes
A Brackenridge
The JTS Partnership LLP
Mr Brendan Ridge
Charlotte and Brendan Byrne
Beard Construction
Brian Jamieson
Mr Brian Oatway
Mr Brian Warren
Bridget Hickey
Woodland Trust
Miss Britt Bjoro
Mr D Long
M Brooks
Bruce Edgar
Head of Development at Reading Borough
Council
Mr Lyttle
Mr Barry Blewitt
Bill Smith
British Telecommunications Plc
BT Reading Borough Council
Reading Borough Council Building Control Team
Michael Burgess
Burghfield Parish Council

Isabel Burn
Ms Caroline Anscombe
Mrs Christine Cliburn
Mr CJ Harding
Thames Properties
Carolyn Michaels
Colin Ponting
Carolyn Ribbons
Michael Smith
Dr Carol Brickley
Doctor Abigail Macleod
Green Park No.1 LLP
Oxford Properties
McCarthy and Stone Retirement Lifestyles LTD
Mrs Carol Froud
Caroline Aubrey
John Lewis Partnership
Caroline Nash
Dr Caroline Charles
Historic Buildings and Places
Joint Committee of the National Amenity Societies
Catherine Wood
Ms Cath Moffat
Ms Cathy Frost
Cathy Szklar
Caversham Traders
Kier Reading LLP
Mount Properties c/o Investra Capital Ltd
Thames Valley Police
Gillotts School
Chris Webster
Climate Change Centre Reading
Conservation Area Action Committee
Coley Park Community Association
Friends of Caversham Court Gardens
Mr Craig Anderson
Charlene Chetty
Drews Limited
Mr Charlie Clare
Charlotte Hayward
Charlotte Markey (Green Blue Urban)
Charlotte Wilshire
Chiara
Rebecca Sherbird
Christopher Hinton
Southern Housing Group
Chris Camfield
Chris Hillcoat
Chris Maddocks
C M Makin
Dr Chris Howlett
Chris Wynn
Christopher Lack
Mr Chris Townsend
Chris Whitehead
Mr Chris Wood
Mrs Ida McVetis
Holmes
Chris Knox
Mr Christopher Bedford
Reading Abbey Quarter Project Team
Mrs Christine Northway
Christine Williams
Christine Lalley
Chris Guy
Sovereign Signs Limited
Church Street Baguettes
Ciaran Coughlan
Cindy Goslar
Pegasus Planning Group
Miss Coral Cissewski
Clair Drever
Claire Kurowski-Ford
Claire Smart
Clare Powell
Eye And Dunsden Parish Council
Holybrook Parish Council
Kidmore End Parish Council
Purley On Thames Parish Council
Shinfield Parish Council
Sonning Parish Council
Tilehurst Parish Council
Mrs Claire Gulliver
Mr Clive Tombs
Clive Orr
Clive Bedford
Cllr Tony Jones
Age UK Reading
Mr Napier Munro-Faure
Colin Calder
Tilehurst Poor's Land Charity
Foster Wheeler
Colin and Christine Robinson

South Central Ambulance Service
John Connell
The Gardens Trust
Tetlow King Planning
Marine Management Organisation
Natural England
Squires Planning
The Sirius Group
Consumer Protection at RBC
Baker Street Area neighbourhood Association
Brighter Futures for Children
Crime Prevention Advice at Thames Valley
Police
Carol Mclellan
CPRE Berkshire Branch
Mr Craige Burden
Cristo Design
Crossrail
Mrs Cathy Snarey
Ms Judith Cullen
Mr & Mrs Martin and Judith Cullen
Miss Susan Curd
SGN
Mrs Christine Cuthbertson
Cyrus Goodall
Kennet & Avon Canal Trust
Reading Climate Change Partnership
Hicks Baker Ltd
Ms Doris Carter
Mr David Cole
David Griffiths
Jacqueline Fisher
BT Repayments Planning Department
Mr Damian Bell
DHA Planning
Dan Fundrey
Miss Emma Perry
Daniel Johnson
Planware Ltd
Daniel Chandler
Danny Wozny
ATP Group Partnership
Darren Cook
Sam Shean
Mr Darren Lovelock
Mr David Earnshaw
Mr Dave Kenny
Mr David Patterson
Dave Cash
Dave Dymond
Redlands And University Neighbourhood NAG
The Ramblers Association - Berkshire Area
Mr David Scull
Strutt and Parker
St James Group Ltd
Date Newnham
David Newnham
Reading Gospel Hall Trust
David Parsons
Mapeley STEPS Limited
David Tarr
Access Architects
David Neale
David Morley
David Syrad Architects
Mr Bates
David Cox
David Cooksley Associates
David and Susan Bailey
David Bailey
Green Health Reading
David Riddle
The Thackery Estate
Miss Dawn Halpin
David Birkett Associates
Denise Tetley
Mr Dean Ellis
Deanna Wells
Mr And Mrs Stone
D Brewer
Debbie Cowen
Deborah Dadd
Mr Alun Edwards
Mr Declan Doherty
Mr & Mrs Sirisena
Delphine Pellenc
Derek Robinson
Mr Derek Bertin
Thames Water
Wokingham Borough Council
Mr Derek North
SusTrans
Diane Honey
Llisa Digweed

Ministry of Defence
David Wills
David Lock Associates
Tarmac
Denis King And Gillian King
Mr Lumbroso
Mr Darren Mulcahy
Magdi Dahroug
Mrs Dorothy Gibert
Dominic Thirlwall
Donna Pentelow
Mr G Goodall
Charlotte Burrowes
Dorothy Bugeja
DPDS Consulting Group
Deighton Peter Raeburn-Ward
David Roberts
David Capstick
David Richmond
Omkar Adhikari (Everest Tandoori)
DJ Bailey
Oxford Analytica
D2 Planning Ltd
Mr Browne
Miss Adrienne Duke
Campbell Gordon
Mr Duncan Wooldridge
Office of Rail Regulation
Red Kite Developments
Mrs Mavis Hallett
Martin & Pole
A H Eberst
Alan Eberst
Eleanor Pitts
Eddie Street
Edmund Bradley
Mr Edward Hammond
Elaine Fullbrook
Emmer Green Residents Association
Mr Edward Wild
Eileen Brooks
Mrs Elaine McDonald
Elaine Dobkowski
Mrs Elaine Warwick
Elaine Mountford
Reading Borough Council Elections
Ellie Emberson
Elisa Miles
Mrs Elizabeth Blair
Mrs Elizabeth Parsons
CBRE
Ellis Coventry
Mr William Pocock
Edwards Irish Partnership
Mr Paul Harrison
West Berkshire Emergency Planning
Vodafone and O2
Ropemaker Properties
Mrs Emma Card
Emma Green
Emma Fletcher
Emma Rawlinson
Sheppard Robson
Barclays Bank Plc
Architectural Drawing Services
Reading Borough Council Environmental
Protection
Mrs E R Smeeth
Cedarmart Ltd
Historic England
Euan Sarson
Evelyn Williams
Aisha Pervaiz
Debra King
Friends, Families And Travellers
Fiona Watson
Ms Fiona Loughlin
Berkshire Archaeology
Fiona Kinnison
Mary Ford
Mr Colin Ford
Swindon Borough Council
France Gerard
SSE Power Distribution
Mrs F Hyman
Francis Brown
Gillian Varley
Sarah Brown
Miss Freda Hyatt
Mr Fred Higgs
I Rivers
Mr and Mrs G Breadmore
Miss Gillian Hopper
Gabriele Alese

RPS Planning
Mapeley Estates Limited
Gareth Warwick
Gareth Rees
Gary Evans
RBFRS
Mr Gavin Thurley
Mr Gavin Moyse
Mr Gordan Ball
Mrs Gillian Wilson
Joan And Graham Clark
Carolyn Davidson
De Merke Estates Ltd
Reading Football Club
The Keen Partnership
Jonathan And Gemma Matthews
Taylor Wimpey West London
Geoff Harmer
Geoffrey Foley
George Baptiste
George Daugherty
George Friel
Jerzy Nowacki
George Bickerstaffe
Gerry Wall
Robert Turley Associates
Graham Brown
Giles Lunn
Gillian Andrews
Gillian Makin
Gillian and Denis King
Mr & Mrs DJ King
Andrew Clifton And Annette McCartney
Julie and Gary Robbins
Glen Slade
G Moffett
Geeta Nath
Gordon Battle
Mr Stuart Gould
Miss Grace Crossley
Graeme Rasdall-Lawes
Mr Graeme Lang
Graeme Powell
Denton And Gibson Ltd
Graham Griffiths
Graham Holt
Mr Graham Jerome
Graham Ritchie (David Wilson Homes)
Mr and Mrs Booth
Mrs Janet Gray
Michael Elliott
Greg Farrell Building and Design
G J Grashoff And A B Grashoff
Gregory and Andrea Grashoff
Gregory Grashoff
Greg Lewis
Network Rail
G Walker
Westbuild Homes Limited
South Bucks District Council
Scott Brownrigg
Mrs Hazel Matthews
Helen Poynter
K2 Developments
Mr Johannes Hersbach
Paul Harper
Montagu Evans
Ian Campbell
Hayley Brommell
Mrs Hazel Andrew
Helen Bryant
Mr And Mrs C.R. And H.E. Hanshaw
Mr Colin Hatcher
Pang Valley Group of the Ramblers
Head Teacher
Mr And Mrs C K Neo
Mrs Heidi Anderson
Disabled Access Group
Helen Bryant
CEMEX
Helen and Steve Goodchild
Miss Helen Gibson
Helen Lambert
Nigel And Helen Dodd
Henry Cumbers (Home Group)
Mrs Linda McCauley
Reading Borough Council HEP
Herbert Monteith
Vijay Thamman
Hazel Andrews
Pioneer Property Services
Reading Borough Council HMO
Harvey Smith
Mr John Hoggett

Ms JM Langford
James Harris
Howard Thomas
Mr Hugh Saunders
Ms Catherine Hutchison
Standard Life Investments
Ian Macro
Ian Howard
Mr Ian Mackinder
Mr Ian Knock
Ian Hunt Associates Ltd
Ian Duddle
Ian Lloyd
Ian Sutherland
Ian Watsham
Mr Ian Cuthbert
Miss I Bradshaw
Arcus Consultancy Services Ltd
Armstrong Rigg Planning
Arthur Hill Save Our Swimming CIC
Hermes
Chair, Reading Chamber Of Commerce
Berkshire Archaeology
CADRA Caversham and District Resident
Association
Carter & Son (Thatcham) Ltd
Mr And Mrs Taylor
Chartered Association of Building Engineers
Dunster And Morton
Fields In Trust
Worton Grange Industrial Limited
The National Federation Of Gypsy Liaison
Groups
Outsmart
Parkinson Holt LLP
Planning Potential Ltd.
Friends Of The Earth
RenewableUK
Reading Voluntary Action
Sara Batting Estate Agents
Thames Valley Air Ambulance
Civil Aviation Authority
Ingeborg Ellison
Irene Lindsay
Royal Berkshire Fire And Rescue Service
Ms Isla Geddes
Reading Conservative Group

Ms Isobel Ballsdon
Ivan & Pam Rushton
Izzy and Val Williams
J Pritchard
Edgington Spink And Hyne
Dr Julia Waters
Woolf Bond Planning LLP
Dr John Partington
Jackie McKie
jack casserley
Ms J Manning Brown
FCC Environment
Lochailort Reading Ltd
James Ford
Old Mutual Property Fund
James Rose
James Sutton
James Vale
Mrs Janet White
James and Carole Russell
Mr James Walsh
Jamie Harcourt
Councillor Jan Gavin
Jan Steele
Mr Jan Steele
Ms Hitchcock And Mr Watts
Dr Mani Karim
Mrs Elizabeth Steele
Jane Chesterfield
The Canal & River Trust
Jane hobden and phil shelley (R Collard Ltd)
Jane Purnomo
Jane Bickerstaffe
Mr And Mrs W Courtnage
Ms Janet Sherbourne
Ms J Maher
Mrs Jan Temperley
Nancy Jarakana
Mr Jason Harper
Mr J Harper
Mr Jason Pyke
Jayantha Ranjith Senanayake Rallage
Jason Muir
Joseph Baker
Mr And Mrs J Colbourn
Mr & Mrs Jackson
Mr John Wilkins

Mr Wilkins
Ms Jean Heward
John Nicholls
Jeannine Summers
Jeff Taylor
Jeff and Jane Thorne
James Eibisch
Miss Jenna Polak
Jennie Newnham
Jenni Shabani
Jenny Elliot
Mrs Jenny Hicks
Mrs Jenny Cottee
Bluestone Planning Ltd
Greyfriars Church
Mr R W Embling
Thames Valley Chamber Of Commerce And
Industry
Shinfield Mothers Union
Sharps Commercial
Reading Transport Ltd
Mr John Mullaney
Mr Johann Wain
Mrs Jill Jones
Kirsten Verran
Barry and Jill King
Jim Cushley
Jiri Brejcha
Owners Of 350 Basingstoke Road
Thames Valley University
Vail Williams LLP
Joseph and Kathryn Rigler
John Adley
Mr John Holland
Smiths Gore
Joanne Anderson
Joanne O’Kane
Miss Joanna Bottiglieri
Mr P Alan
Mr Philip Allen
Jodie Brown
Metis Homes
John Barnfield
John Craggs
John Dunningham
Imperial Properties (Reading) Ltd
Cognatum

RBC Procurement
BDO Stoy Hayward LLP
Transport 2000
John Berry
John Goodall
John and Kay Hayes
Mr John Hendy
John And Meg Vought
Haslams
Mr John J Frake
Joanne Hales
Heineken (UK) Ltd
Savills
Highdown Avenue Management Association
Limited
Jonathan Gater
Royal Berkshire NHS Foundation Trust
University Of Reading
Mr Jonathan Walton
Jonathan Meek
Mr Jonathan Green
Mr Jonathan Sutton
Julia Evans
Greater London Authority
Mayor of London
Ms Marie Percival
Jane Lawson-Mudge
Mr Joseph Provino
LaSalle Investment Management
Deloitte
Judith Oliver
Judy Reddy
Mr John Hall
Julia Toovey
Julia Branson
Julia and Steve Farey
Cantay House Partnership
Julian Rowley
Norma and Julian Ansell
TA Fisher & Sons
Mrs June Hardcastle
Englefield Estate
Justin Patient
Jonathan Jones
Joan Walker
James Moore
Karin Lesnik-Oberstein

Kadambari Michaels
Kalani Seymour
Ms Karen Rumbol
Karen Blofield
Miss Karen Reeves
Ms Karin Herbst
Kate Corder
Open Spaces Society
Thames Properties Ltd
Katherine Slater
Katherine Abram
Katia Major
Katrina Parker
Stanhope PLC
Kathleen Fraser-Harding
Spitfire Properties LLP
Mr Keith Downer
Berkshire County Blind Society
Keith Mack
Mr Keith Weaver
Keith Elliott
Keith & Elaine Faulkner
Mr and Mrs KA Hutt
Mrs Kelly Tatam
Ken Macrae
Sue and Ken Dyson
Mr Kenneth Morris
K Phillips
Ken Phillips
K H Scott
Kevin Bee
Kevin Eustace
Kevin McQueen
Kevin Blackburn
Kevin Rapson
Setsquare Solutions
Mr Kevin Griffiths
National Offender Management Service/HM
Prisons
Halson Mackley Partnership
Carter Jonas
Lafarge Tarmac
Kim Hutt
Kirsti Wilson
Reverend Keith Knee-Robinson
Firstplan
K Moore

Katie Dean
Kim Morley
Keith Faulkner
Louise Turner
Adam Lake
Shaun Langley
Owner/Occupier
Larry Watson
Mrs Laura Roses
Stewart Ross Associates
Laura and Alistair Johnson
Laura De Moxom
Laura Close
Lauren Thompson (Tesni Properties Ltd)
Lawrie Lee
Ian Lawson
Oxford City Council
Larissa Davis-Wall
Robert Leeks
Lee And Brian Waite
Booker Group plc
Leon Collyer
Mr Leon Dowling
Louise Bancroft
Leslie Gibson
Leslee Hopper
Mark and Leslie George
Mr Leslie Chubb
Mr Leslie Burrow
RBC Licencing Team
Lin Godfrey
Women's Learning Centre
Linda Church
Lindsay Braine
Lindsey McConnell
Lindsey Brown
Peter and Linda Rendell
Lisa Smith
Frances
Lis Clayton
Mrs Lis Howlett
Education and Skills Funding Agency
Ms Liz Ellis
Lizzie Angove
Lin Godrey
James Lloyd
Lloyd Pople

Willowside Homes
Laurence Newman
Mr Nigel Haines
Gerald Eve
Basingstoke & Deane Borough Council
Health And Safety Executive (Local and
Neighbourhood Plans, CEMHD5)
Plainview Planning
Rapleys
Mr Logan Morris
Morley Fund Management Ltd
Lorna Andrew And Jed Ellerby
Lotta Ridgley
Charlotte Steyn
Louisa Medland
Louise Fenner
Louise Acreman
Louise Clements
Louise Shah
Stuart Lowe
Lucy Bureau
Luke Sumnall
Luke Bangs
Northcourt Avenue Residents Association
Mr Guest
Mrs Lyn Chandler
Lynda Chater
Lynn Rankin
Mrs Lynn Eggleton
Ms Lynne Lemon
Cllr Mohammed Ayub
Mr Mark Young
North Whitley Tenant Team Chair
Mr Magnus Smyly
Abbey Baptist Church
BDS Surveyors Ltd
Davis Planning
Elaine Bloomfield
Homes and Communities Agency
Ryan Taggart
Rachel Hudson
Mr & Mrs Maitland
Tony Hill
Dagleish And Co
Boyes Turner
PCSO Marion Ryall
Ms Amanda Day

Mr Martin Wagner
Margaretta Watkins
M Malet
Councillor Marian Livingston
Marie De Viell
Marie-Dominique Meunier
Miss Marissa Tsoukas
Mr Mark Ashfield
Home Builders Federation
Defence Estates Head Office
SSA Planning Limited
Mark Summers
Walsingham Planning
Mark Barratt
The Butler Partnership
Mr Richard Goldup
Mr Mark Drukker
Mark Eveleigh
Mark Leedale Planning
Mr Mark Pargeter
Mr Mark Roach
Marta O'Brien
Mr Martin Brommell
Martin Chalmers
Inchcape Estates Limited
Martin Bishop
Martina Brejcha
Mr Martin Campion
Mr Winter
Mr Martyn Jones
Sonic Star Properties Ltd
Tennant Support Ground Floor
Mrs Mary Matchwick
Mrs Mary Waite
Mary Bartlett
Mary Cook
Sovereign
MP Matt Rodda
Mr And Mrs M Gulliford
Museums, Archives And Libraries
Matthew Flynn
Mrs Susan McCready
Mr Matt Shaw
Kier Property Developments Limited
Ms Dawn Whipp
Mr M Barrett
Mrs Margaret McDermott

Mr John McLeod	IKEA Investment Properties Ltd
Mark Chapman	Maria and Winston Wainwright
Mohan Everett	Paul Myerscough
Country Land and Business Association (Ashill)	Access & Planning (Education\Strategy & Planning
Dr Megan Aldrich	Tenant Support
Meghan Rossiter(Abri)	Mr Nigel Armstead
Melanie Sutherland	Professor Nigel Bell
Councillor Melanie Eastwood	Dr And Mrs Caithness
Mrs Melanie Minty	Goodman International Ltd
Iceni Projects	P J Planning
Ridge And Partners	Natalie Pryor
Michael Payne	Avison Young
Michael Steen	National Grid
Michael Burnet Smith	Spenn Hill Developments
Michael Geater	P R Eley
Margaret and Michael Pocock	Dr Neil Buchan
Mr Michael Wellock	Neil Denham
Mr and Mrs Griffin	Chillingham Limited
Michele Page	Reading Chronicle Environment Correspondent
Boyer Planning	Nicolas Everitt
Miss Michelle Sleaford	Scottish And Southern Electricity Plc
Michael Kenny	Shirwell Ltd
Mike Brammer	Nick Jones
CgMs Consulting	Miss Amy Miles
Mike Merrick	Mrs Zoe Page-Smith
Michael Parker	Mr Nick Clark
Mr Michael Thomas	Boyer Planning Limited
David And Gaylene Shepherd	Nick Lamb
Mr Martin Mikhail	Ms Nicky Simpson
Martin Jukes	Miss Nicola Hamblin
Motik Consulting Associates	Nicky Bradley
Monika Bulmer	Thomas Eggar LLP
Joan Moore	Linden Homes
Miss Hilary Morton	GWR
Jacks Fish and Chips	Mrs Nicola Tipler
Mr Richard Mallett	Ms Taplin
Paul Goddard	Reading UK CIC
Mr Tony Martin	Mr Derek Chapman
Marco Zuppone	Nick Hunter
Miss Melanie Tether	Noelia Cabello-Moreno
Mary Phelan	Hallam Land Management Ltd
Jane Field	National Police Air Service
Murielle Brugoux	Norman Bullock
Elaine Murray	Reading Buses
Mr And Mrs A Murray	Niamh Sherwood
Murray Hyden	Jim and Margaret Nutley
Reading Muslim Council	

Steve Ayers
Oliver Maitland
Mr And Mrs Christopher O'Malley
Office For Nuclear Regulation
ONR Land Use Planning
Owen Andrews
Oisin Lynch
Peter and Linda Smith
Peter A Smith And Linda M Smith
Alan and Pam Reynolds
Mr DA Weston
RBC Parks Team
Berkshire Van Hire
Laurence and Patricia Callan
Reading Urban Wildlife Group
Highways England
Pat Watson
Mr Paul Elford
Alastair Letchford
Leone Letchford
Paul and Leone Letchford
Paul Letchford
Slough Borough Council
Mr Paul Turnock
Councillor Paul Woodward
Professor Paul Bardos (R3 Environmental
Technology Ltd)
The Council Of British Archaeology
Paul Buck
Pauline Monks
Paul Hammond
Mr Paul Raynsford
Mr Paul Rylands
Paul Williams
Brook Henderson Group Limited
Trustees of the Phillimore Successors Settlement
Mr Peter Dreweatt
Richard Purkis
Penelope Baldwin
P Townsend
Mr Peter Hempstead
Peter & Jacqueline Charles-Jones
Mr Peter Wood
Mr And Mrs Peter & Jennie West
Peter Bowles
Mr Peter Hallbery
Mr Peter Weaver

Mr And Mrs Halter
Mr Paul Higginbotham
Mr Phil Baines (Baines Builders)
Philip Darlow
Mrs Eileen Uden
Unite Students
Miss Davies
Mr Phillip Gill
Reading and Mid Berks CAMRA
Reading And Mid Berkshire CAMRA
Pip Waite
Peter J Vallance
Mr Peter Woodbridge
Plan Ahead Drawing Services
Rushmoor Borough Council
West Berkshire District Council
Piers Caswell
Plan Info Research Team
Surrey County Council
RBC Planning Enforcement
Wokingham Borough Council
RBC Natural Environment
Hampshire County Council
Royal Borough Of Windsor And Maidenhead
South Oxfordshire District Council
Surrey Heath Borough Council
Vale of White Horse District Council
Sport England
RBC Planning Viability
WYG
British Waterways
Canal River Trust
Peacock & Smith
Wm Morrison Supermarkets Plc
The Theatres Trust
Watkins Jones Group
Wycombe District Council
Environment Agency
CAMRA
The Coal Authority
Forestry Commission
HSE
Hart District Council
RBC Planning Policy
Test Valley Borough Council
Peter Asquith
M D Howlett Associates Ltd

Mr Howlett
Mr Peter Moran
Troy Planning
Ms Susan Grover
Neville Turner
Mr Colin Lee
Sharmila Perera
Patrick Bingley
Mr Peter Baker
Peter Mainprize
Marcus Laing
David & Jane Eyre
Phil Smith
EE
Frances Hill
Mrs Rosemary Porter
Mr R V Smith
Mrs Sheila Smith
Mr Meyrick Price
Provision Planning
Ruth Ponting
Ruth Shaffrey
Nexus Planning
Miss Rebecca Mashayekh
Mr Rab Lee
Rachel Houston
Councillor Rachel Eden
Mr Craig Round
Hammerson Plc
Mrs Rachel Ruchpaul
Creative Design and Structure Ltd
Mrs Karen Close
RG Butler Associates
Dr Ranald Stuart
Marrons Planning
Inglewood Court Residents Association
GS Ecology
Reading Cycle Campaign
Miss Rachel Blissett-Lynne
Kevin Webb
Federation Of Tenants & Residents Associations
Peter Brett Associates
Prospect Estate Agents
Romans
Rebecca Gibson
Environmental Protection (Reading Borough Council)

Rebecca Chiazzese
Russell Chant
Mrs R Mansor
Mr Robert O'Neill
Ramona Bridgman
Ruth Case
Richard Earle
Bellway Homes
Richard and Doreen Jones
Benchmark Planning
Richard Lemon (SAV Group)
Thames Valley Berkshire Local Enterprise Partnership
Mr Richard Riley
Transport for London
Mr Richard Kenwood
Katrina Richards
Mr And Mrs R Buzza
Cllr Ricky Duveen
Mrs Sheila Lines
Ryan Shook
Bell Cornwell Partnership
Catherine Place Properties
The Laurel Dawn Property Trading Partnership
Sehmi Builders Merchants
Rob Dunbar
Rob Page
Cllr Rob White
Councillor Rob White
Robert Markus Gyselynck & Mya Davis
Mr Robert Prescott
Robert Rigby Architects Limited
Robert Dimmick
Mr Robert Constance
Robert Sherwood
Robert Mountford
Aviva Life Pensions UK Ltd
Arlington Business Parks GP Limited (Goodman)
The Warren & District Residents Association
TA Fisher
Peter Robinson
Robin Thomas
ET Planning
Thames Valley Division
Cumming Anderton Architects
Freshwater Group
Roger Williams

Roger Ebbett
Mr Roger N Walton
Rosemary Thomas
R G Fairgrieve
Ronald Hooper
Mr Ronald Cutting
Rupesh Kumar
Councillor Rose Williams
Hilary & Rosalind Nash
Rosemary Braine
Ross Jarvis
Richard Pearson
Rosemary Jones
Mr Ross Thomson
RBS Pension Trustee Ltd
Standard Life Investments Ltd
Ruby Wilkinson
Richborough Estates
Ruth Steggles
Ruth Brooks
Ruth Thomas
Coppid Farming Enterprises c/o Savills
NHS Property Services
Reading Youth Cabinet
Andrew Palarczyk
Woolf Bond Planning
Cllr Sophia James
Sarah Judge
Steve Watson
Sara Fulbrook
Robin Scott
Sally Beales
Sally Roark
Sally Archer
Sally Ellis
Studios Construction Reading Ltd
BBOWT
Sam Grasshoff
Sam Harmer
Dr Samantha Coates
Mrs Sandie Rimmer
Sandra Ilsley
Councillor Sandra Vickers
Sandra Robinson
Roger & Sandra Beavis
Sara Baker
John George Ltd

Ms Sarah Gee
Councillor Sarah-Jane Hacker
Integrated Youth Development Service
Sarah Tapliss
Ms Sarah Waite
Sarah Horne
Sarah Nelson
Sarah Robinson
Stephen Cook
McKay Securities Plc
Stephen Day
Sara Degortes
The Royal Society For The Protection Of Birds
Sackville Developments (Reading) Ltd
Quod
Sean Fleming
Reading Golf Club Ltd
Sarah Eden-Jones
Mrs S Elston
Abracad
RBC Legal Services
Mr Sunil Gandhi
Mr Stephen Gould
Mr Shahid Rafiq
Fusion Online Limited
Ms Sharon Kiely
Sharon Fitton
Sharon Oldham
Tim Sharpe
Sheila Harris
Sheilah Higginson
Ms S Sheikh
Shonagh Brunnen
Sue Blanco White
Sigi Teer
Thames Valley Police
Festival Republic Ltd
Roxhill Developments Ltd
Mr Simon Ede
Mr Simon Riley
Dr Simon Rowe
Blandy And Blandy
Simona Kermavnar
Simone Illger
Siobhan Woodgatef
Sara Kopp
Simon Lang

Sarah Roy
Paul Smith
Dr Andrew Smith
Ms Sonia Law
Miss Charlotte Hopley
Sophie Fenwick-Paul
Crest Nicholson Ltd
NHS South Reading Clinical Commissioning Group
Mr Steve Higgs
Mr Steve Luckcock
Euro Link Property Services
TRW Pensions Trust Ltd
P Reynolds
Caroline Starkey
Dr S Lauria
Ms Stella Clark
Stephanie Hendley
Qoud
Stephen Cousins
Mr Stephen Young
Mr Stephen Biddle
Stephen Cox
S E Tucker And J Calcutt
Rachael Abery
Hicks Developments Ltd
Mr Steve Hicks
Valuations (Environment\Development) Flo 3
Mrs Julie Gould
Steve Waite
Mr S Kendrick (SK-tec Ltd)
Julie Hicks
Stephen Birch
Viridis Real Estate
Stephanie Oldfield
Mr Ross
Sylvia Tompkins
Buckinghamshire County Council
RBC Street Care Admin
Stuart Hylton
Stuart Ward
Sue Brackley
Sue Lunn
Bracknell Forest Council
Living Reading
Sue Ronay
Susan Tait

Mr Sunil Fernandes
Mr S Mangat
Hualin Sun
Mr David Elliott
Nicola Elliot
Mr Surinder Puri
Ms Susan Knight
Mrs Susan Johnston
Susan Spires
Public Health Consultant
Mrs Susan Alexander
Mrs Susan Baker
Mr & Mrs S D'Cruz
RBC Sustainability Team
RBC Sustainable Drainage Team
Suzanne and Nick Baily
Reverend Suzanne Knight
Jones Lang LaSalle
Framptons
Homes England
Mr & Mrs A Holland
Tanja Rebel
Tanya Day
Miss Tanya Rosenberg
Mrs Tanya Rae
Harris Partnership
Mrs Tina Barnes
Gladman Developments
Mr Terry Alway
Mr Terry Mills
Terry & Sue Drayton
Mr Hora Tevfik
Mrs Francis Mitchell
Robert Cort Properties
Raglan Housing Association
Thames Water
Ms Ruth Perkins
Sarah Coole
Trevor Haynes
Ms Joanna Stewart
Therese Wicks
Wiltshire Council
John Heaps
Mr Tim Humphries
Tilehurst Allotments Society
Barton Willmore
Mr Tim Byrne

Tim Fraser-Harding
Mr T Gutteridge
DTZ Piedad Consulting
Assael Architecture Ltd
TJ Cook
Tim Cook
Building Design
D.Tingle Building Design
Thaddeus Jackson-Brown
Mr Trevor Keable
Tuhin Miah
Alastair Bainton
Toby Scammell
Tom Lynch
Thomas Lake
Tom Mitchell
Mr Tom Stagles
Bucknell Family - Global Futures Limited
Mr Tom Winchester
Mr Tom Robinson
Cllr Thomas Steele
Mrs Theresa Robinson
Tom Evans
Mr Thomas Sinclair
Radian
Mr Anthony Ford
ARD Chartered Architect
Mr B Fostekew
BDS Surveyors Limited
UBS Global Asset Management (UK) Ltd
Tracey Essery
Mrs Tracey Dunk
RBC Transport Development Control
Mr Trevor Thomas
Mrs Patricia Woodcock
Kempton Carr Croft
Tristan Plum
Lucie Twivey
Bell Tower Community Association
Amy Unsworth
Elizabeth Unsworth
Mrs Azka Desousa
Mrs Virginia Day
Susan Sheppard
Valerie Gardiner

Reverend Vernon Orr
Veronica Elleson
Ms Veronica Chapman
Veronica Leeke
Mrs V Munro
Lambert Smith Hampton
Acre
Victoria Blades
H&T Properties Ltd
Indigo Planning
Bewley Homes
Mrs Violet Hurn
Viren Sharma
Vivien Cunningham
Mr John Varney
Vladislava Maskova
Ms Vickie Abel
Mr W S G Macphee
Mr David Warren
Waste Services
Anthony Warrell
Kathleen Somerville
Royal Berkshire Fire and Rescue
RBFRS
Broadway Malyan
Anne and Derek White
Prudential Plc
Mr William Bray
Ericsson
Chloe Lewendon
Margaret Wilson
SGN plc
Mrs Pamela Webb
Louize Bovey
South East Water
R May
Yann Guillet
Sun Street Y&C Centre
RPS
Yoyo Ting Yiu Dixon
Mr M Zamir
Ms Zeba Rao
Zenoida Ustinov
Zoe Brown
Mr Mohammad Zaheer Zamir

Appendix 2: Consultation Email Text

Reading Borough Local Plan – chance to comment on the Local Plan Partial Update Consultation on Scope and Content (Regulation 18)

Reading Borough Council is now consulting on the Local Plan Partial Update (Consultation on Scope and Content under Regulation 18) until 31st January 2024.

The Local Plan is a crucial Council planning document which will help inform decisions on planning applications up to 2041. We are in the process of updating the Local Plan to take account of recent changes to legislation, address the urgent need for more homes (including affordable homes), plan for associated infrastructure and ensure that sustainable development will help Reading achieve its net zero carbon ambitions. 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 until the end of January during a period of public consultation. The Local Plan Partial Update Scope and Content document is on the Council's website at: <http://www.reading.gov.uk/localplanupdate> 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 Sustainability Appraisal and draft Infrastructure Delivery Plan are also available on the Council's website and are available for your comments.

We welcome any comments that you have. Please provide written responses to the consultation by 5 p.m. on Wednesday 31st January 2024. You may complete the [online questionnaire](#) to answer specific questions. The online questionnaire can be accessed via a link on the local plan update webpage. Alternatively, you may respond more generally in writing by email or post. These responses should be sent to: planningpolicy@reading.gov.uk or Planning Policy Team, Reading Borough Council, Civic Offices, Bridge Street, RG1 2LU.

You may also wish to attend one of our drop-in events to talk about the Local Plan to a planning officer in more detail. There is no need to let us know if you wish to attend beforehand. These will be held at the Civic Offices, Bridge Street, RG1 2LU in main reception on Thursday 7th December from 1:00 to 6:00 p.m. and Monday 11th December from 2:00 to 7:00 p.m.

We will also be holding an online webinar on Wednesday 13th December at 6pm. Please email us directly if you wish to attend the webinar and we will send instructions on how to join.

Following the public consultation, officers will take some time to consider the public's feedback before the next stage of consultation on an updated draft Local Plan. The final phase is for Reading's updated Local Plan to be submitted to the Secretary of State for approval.

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



Front



Back



Middle

Appendix 4: Council's Press Release

[Local Plan Consultation Offers Opportunity to Help Shape the Future of Reading](#)

Local Plan Consultation Offers Opportunity to Help Shape the Future of Reading

27th November 2023, Oscar Mortali

- *Public consultation launches today on key local planning document which will help shape the future of Reading*
- *Council is proposing changes to increase the number of family-sized homes, affordable homes and set high standards for developers on sustainable housing*
- *Residents have until the end of January to take part*



RESIDENTS are being invited to help shape the future of their town by taking part in an important public consultation on a refreshed planning blueprint for Reading.

The Local Plan is a crucial Council planning document which will help inform decisions on planning applications up to 2041. It outlines Council policies on key issues like future housing need, affordable homes, associated infrastructure and how sustainable developments will help Reading drive towards its net zero carbon ambitions.

Adopted in 2019, Reading's Local Plan now needs updating to take into account changes in national planning legislation and the need nationally for more homes to tackle a housing shortage exacerbated by the cost-of-living crisis.

Locally in Reading, there is a specific focus on more affordable homes, more family-sized homes and more energy efficient housing. Every council needs to review its Local Plan by law within five years of adoption and, as a result of this review, the Council has decided to undertake what is known as a 'partial update'.

In relation to the level of housing need in Reading borough, the adopted Local Plan provides for 689 new homes a year, but this would increase substantially, particularly under the new national methodology for calculating need that the Government expects councils to use. The

Council is instead proposing that the figure should be based around what is estimated to be achievable in the town, which is 800 new homes a year.

The refreshed Local Plan additionally seeks to ask developers to help address the acute shortage of family-sized homes in Reading. Outside of central Reading, the Council is proposing to increase the target for the amount of family housing needed to 67%, up from 50% in the current version, while acknowledging that developments in central Reading are likely to be mainly made up of one and two bedroom homes but should still seek to deliver an increase in family homes.

The consultation document also includes proposals for additional sites for development by the public, landowners or organisations. People are being asked for their views on these proposed sites ahead of further consideration next year on whether they should be included in Reading's refreshed Local Plan.

The consultation document can be accessed online at www.reading.gov.uk/localplanupdate and people can have their say at <https://consult.reading.gov.uk/dens/local-plan-consultation/>.



Councillor Micky Leng, Reading Borough Council's Lead for Planning, said:

"As a Council we want to work with developers to address the desperate shortage of family-sized homes in Reading and I am pleased to see the revised draft proposes a 67% target outside the central area, up from 50%

"We have also committed to aim for Reading to be a net zero town by 2030 and the Local Plan already plays a huge role by setting high standards for developers in terms of creating genuinely sustainable homes, and importantly, the role energy efficient homes play in driving down costs for struggling households.

"The Local Plan is not just about building new homes though. It is also about protection of land and changes in national law and policy which mean that greater protection must also be afforded to biodiversity, wildlife and existing habitats.

“There is a need to update 45 of the 90 existing policies. Some residents may have a policy interest they’re focused on, it could be our Public Realm, Build to Rent, Affordable Homes Policy or a particular place such as the Royal Berks Hospital. There are 80 plus questions in the consultation and I recognise the Christmas period is a busy time of year for our residents. You don’t have to answer all of the questions, you can choose however many you wish.

“This is a genuine opportunity to influence the role of development in your town, for many years to come. I’d urge residents, businesses and organisations across Reading to take some time over the coming weeks to take a look at our intended direction of travel and feed into the plans.”

Public consultation began today (Nov 27) and has been extended by over three weeks, from the usual 6 weeks, to take into account the up-and-coming Christmas period. The deadline for comments is January 31st at 5pm.

Residents can either use the online questionnaire to answer specific questions on the area they are interested in, or can respond more generally in writing by e-mail or post. Comments submitted by email should be sent to planningpolicy@reading.gov.uk or by post to: *Planning Policy Team, Reading Borough Council, Civic Offices Reading RG1 2LU*. The online questionnaire can be accessed at <https://consult.reading.gov.uk/dens/local-plan-consultation/>

If residents prefer, physical copies of the Local Plan Scope and Content document can be viewed at the Civic Offices on Bridge Street between 9am and 5pm on weekdays, and in all Council libraries.

Two drop-in sessions will also take place where residents can discuss the proposed changes in more detail with a member of the planning policy team. These also take place at the Civic Offices main reception area on Thursday 7 December from 1pm to 6pm, and on Monday 11 December from 2pm to 7pm. This will be followed by an online webinar on Wednesday 13 December at 6pm. Anyone interested in joining the webinar should confirm attendance by emailing planningpolicy@reading.gov.uk. The Council will provide further details via email upon confirmation of attendance.

Following the public consultation, officers will take some time to consider public feedback before returning to Committee in July next year for the next stage of consultation. The final phase is for Reading’s updated Local Plan to be submitted to the Secretary of State for approval.

Appendix 5: Press Articles

[Reading Local Plan update: Large sites earmarked for new homes - BBC News](#)

[Views sought on Reading changes that shape plans until 2041 | Reading Chronicle](#)

[Eleven sites in Reading where homes could be built | Reading Chronicle](#)

[Nine sites in Reading that could be turned into homes | Reading Chronicle](#)

[Council begins consultation on local plan for key housing and development proposals – Reading Today Online \(rdg.today\)](#)

[Reading consults public on local plan proposals | The Planner](#)

Appendix 6: Link to Reg 18 Explainer Video

<https://www.youtube.com/watch?v=eZg-4WdBiWo>

Appendix 7: Link to Reg 18 Webinar Recording:

[Reading Council Local Plan Partial Update Webinar | 12 December 2023 - YouTube](#)

Appendix 8: Exhibition Boards for Drop-In Events

Welcome to the Local Plan Partial Update Consultation

Have Your Say on the future development of Reading

Local Plan Scope and Content Consultation

@ReadingCouncil
reading.gov.uk/localplanupdate

Reading
 Borough Council
 Working better with you

Local Plan Consultation
Where We Are in the Process

Review of the Local Plan 2019
 March 2023

Scope and Content Consultation
 November 2023

Pre-Submission Local Plan
 July 2024

Examination*
 Late 2024

Adoption*
 Summer 2025

We are at the second stage of the process: the *Scope and Content* consultation. This document sets out the direction of travel for the proposed policy updates including housing numbers per year and sites that have been put forward for development in response to the ‘Call for Sites’ exercise held earlier this year.

We invite you to share your views and comments on the *Scope and Content* document. All written responses will be considered as we prepare for the next stage of the local plan process.

The Local Plan Partial Update, when finalised, will replace the existing Local Plan (2019).

Reading
 Borough Council
 Working better with you

* Subject to Planning Inspectorate

What is this consultation about?

This consultation forms part of the process of updating the existing Local Plan for Reading.

The Local Plan Partial Update will include all of the planning policies for Reading, and will deal with how much development there should be, where it should be, what form it should take, and what should be protected from development.

This stage is the 'Scope and Content', where we set out the general direction for policies and ask for your views on this. We have also included a number of sites put forward by landowners for possible future development. The next stage will be the production of the draft local plan which will go into more detail, taking into account comments from this round of consultation.

Some of the headlines are:

- Planning for 800 new homes per year;
- Updates on the type of affordable housing to meet latest needs;
- A 10% mandatory biodiversity net gain on development sites from Jan/April 2024 onwards;
- Greater provision of family-sized dwellings across the borough;
- Strengthening policies that deal with climate change mitigation, for example, provision of low and no carbon energy sources for new development;
- Identifying what key pieces of strategic infrastructure will be required up until 2041 to accommodate for planned growth; and
- Delivering office, retail and industrial use based on up-to-date data.



How can I get involved?

The consultation runs until Wednesday 31st January 2024. We welcome any comments that you have.

You can fill out our online questionnaire at the link below or by scanning the QR code:

consult.reading.gov.uk/dens/local-plan-consultation

You do not need to answer every question.

Alternatively, you can comment by writing to us (via email or post) at:

planningpolicy@reading.gov.uk

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



Local Plan Consultation

Have Your Say: Housing

How much housing?

We currently are working with consultants to establish how many homes are required up until 2041. The existing requirement figure is 689 homes per year. The new, locally-based need figure is likely to be around 735 homes per year, however, there may be capacity in Reading to accommodate approximately 800 homes per year up until 2041.

Category	Housing Numbers per year
Existing housing requirement (Local Plan 2019)	689
Proposed housing provision under Local Plan Partial Update	800

The proposed housing provision figure is expected to be in the region of 800 homes per year for a total of around 14,400 homes. This indicative figure is based on available capacity.

Affordable Housing

We will update the types of affordable housing delivered so that it aligns with the Affordable Housing SPD. For example, a requirement for a minimum of 62% of all affordable housing to comprise affordable rent, and a maximum of 38% to comprise affordable home ownership.

In addition, it is proposed that First Homes discounts are included at a rate of 25%, as a part of the affordable sale requirement.

We also look at other types of housing:

- Accommodation for vulnerable people:** Presently, there is no need for additional extra care facilities. However, there is a need to replace some existing facilities with more modern accommodation.
- Self-Build:** Updates will ensure a stronger emphasis for providing self-build housing opportunities on developments of 10+ homes.
- Co-Living:** A new policy will be created to deal with any future planning applications for co-living.
- Density and Mix:** We are proposing to increase minimum residential densities and the number of 3+ bed homes on site (e.g., from 50% to 67% outside centres and 20% within district/local centres).
- Residential conversions:** We will introduce greater restrictions on conversions to Houses in Multiple Occupation to prevent further loss of family-sized dwellings.

Examples of new housing in the town*

* Some developments not yet complete

Local Plan Consultation

Have Your Say: Sustainability

RBC declared a Climate Emergency in 2019 and have set a goal of a net zero carbon Reading by 2030

We propose to strengthen policies that deal with:

Design and construction of buildings to decrease energy use and emissions, as well as reduce waste

Provision of low and no carbon energy sources

Adaptation measures to deal with extreme weather, such as flooding or heatwaves

Increasing biodiversity

Making better use of land in accessible locations that will reduce the need for travel and encourage walking, cycling and public transport use

Reducing water use

Waterloo Meadows
An urban park situated along the River Kennet, offering a variety of landscapes and biodiversity.

Reading Hydro, Caversham Weir
A sustainable solution for generating electricity

Christchurch Bridge, Thames River
Helping to make Reading a walkable town and offering residents a sustainable mode of transport

Arthur Hill Swimming Pool Site, Kings Road
15 flats created at site for key workers. Housing to meet international sustainability and low carbon standards (Passivhaus)

Reading Green Park Station
Offering sustainable travel choices

Proposals for new Reading Library, Civic Offices
Proposals to include air source heat pumps and solar shading

Local Plan Consultation

Have Your Say: Biodiversity, Transport & Infrastructure, Retail, Design

Biodiversity



The Council is committed to working towards a net-zero carbon Reading by 2030 and future development in the town needs to help us achieve this.

One way to address the climate emergency is through ensuring greater protection afforded to biodiversity, wildlife, and existing habitats. As such, we are implementing the mandatory national 10% biodiversity net gain on all developments.

Transport & Infrastructure

It is vital that the necessary infrastructure is provided to accommodate planned growth within Reading to 2041.

The Patrial Update identifies a need for infrastructure related to open space, biodiversity, education, digital connectivity, employment and skills, healthcare, climate change mitigation and more. We are working with partners to identify key strategic pieces of infrastructure that are needed up until 2041. The plan aims to identify what schemes are needed, when will they be needed, who is responsible for providing the scheme, and how will it be funded.

We are also updating our transport policies to enable major transport projects to be delivered, as well as encouraging sustainable and active travel.



Retail (plus leisure & culture)

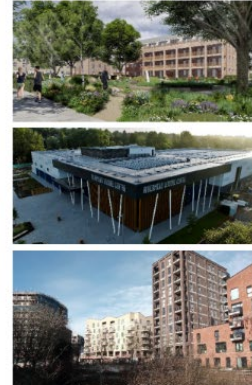


We are proposing to update our policies to refer to the latest needs for retail, leisure and culture uses, taking into account the most up-to-date information.

We are also looking to place greater restrictions on adult gaming centres and gambling establishments to limit their impact on the economic conditions and character of local areas.



Design



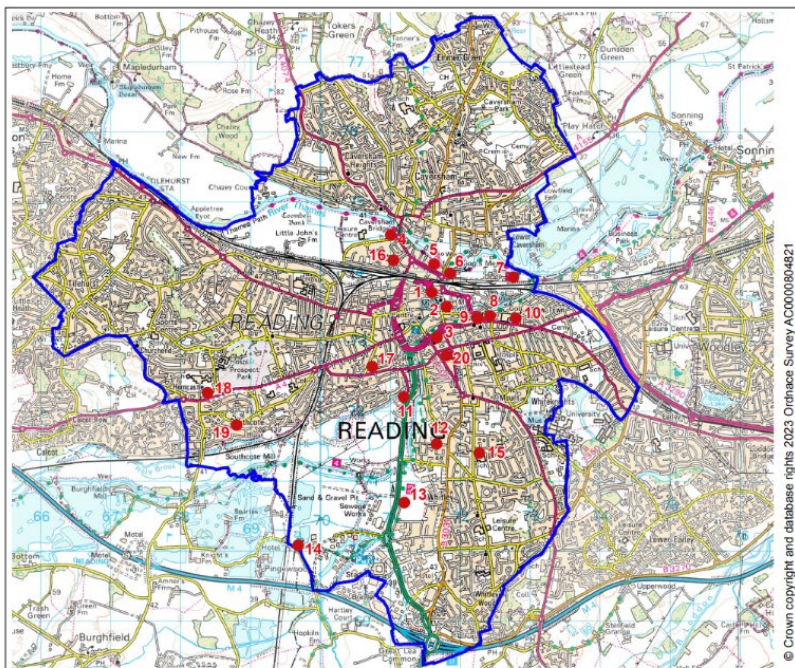
We are keen to promote high quality design to maintain and enhance the character of Reading.

We are proposing updates so that the relevant policies will provide a basis for forthcoming design codes. These codes will set out a design framework that developments must adhere to, for example, enhancing physical character, nurturing community and addressing environmental issues.



Local Plan Consultation

Where have new sites been suggested to us for development?



- 1 Aquis House, 49-51 Forbury Road and 33 Blagrove Street
Suggested for development for mixed office and residential
- 2 Reading Central Library, Abbey Square
Suggested for residential development
- 3 John Lewis Depot, Mill Land
Suggested for residential development
- 4 Crown Plaza Reading, Richfield Avenue
Suggested for mix of hotel, food and drink, residential, care home, EV charging station
- 5 2 Norman Place
Suggested for residential development
- 6 Reading Bridge House, George Street
Suggested for residential development
- 7 Tesco Extra, Napier Road
Suggested for residential development
- 8 Kennet Place, Kings Road
Suggested for change of use to residential
- 9 Sapphire Plaza, Watlington St & Royal Court, Kings Rd
Suggested for development for residential and commercial
- 10 Part of Reading College, Kings Road
Suggested for development for residential or mixed use
- 11 Reading Link Retail Park
Suggested for development for residential and retail
- 12 Tunbridge Jones, Cradock Road
Suggested for residential development
- 13 Former Sales and Marketing Suite, Drake Way
Suggested for residential development
- 14 Site at Green Park Village, Flagstaff Road
Suggested for residential development
- 15 2 Hexham Road
Suggested for residential development
- 16 Land west of Milford Road
Suggested for residential development
- 17 72 Berkeley Avenue
Suggested for residential use
- 18 Land at 132-134 Bath Road
Suggested for residential or mixed commercial and residential
- 19 Southcote Library, 234 Southcote Lane
Suggested for residential development
- 20 Land at 9 Upper Crown Street
Suggested for residential development

© Crown copyright and database rights 2023 Ordnance Survey AC000004821



Appendix 9: Social Media Assets



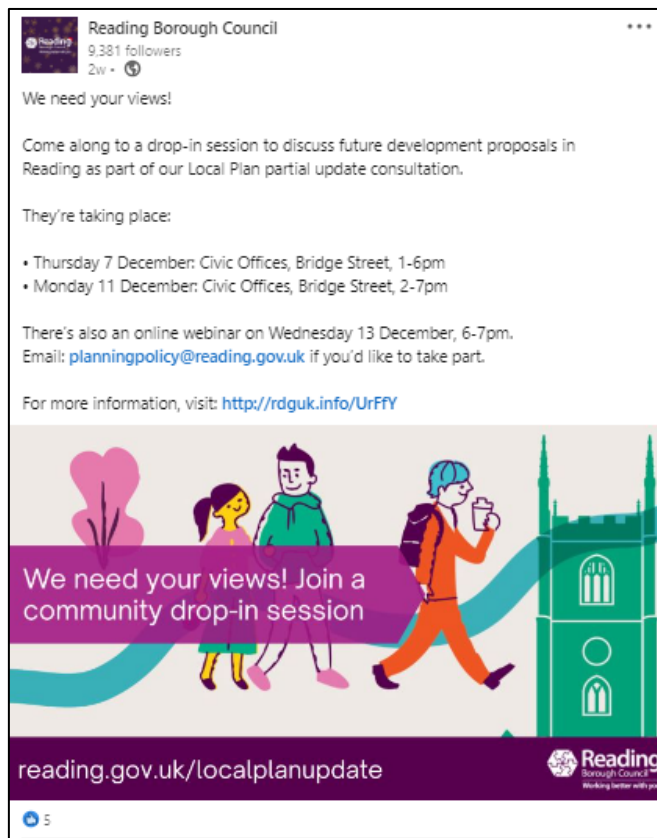
Appendix 10: Selection of Social Media Posts



Facebook promotional post 08/12/2023



X promotional post 11/12/2023



LinkedIn promotional post 05/12/2023

Appendix 11: Online Webinar poll results and Q&A

During the online Webinar held on 13/12/2023, RBC officers enabled the use of the 'Poll' function on Microsoft Teams to engage with attendees. A total of five questions were asked, the results of which are detailed below. It should be noted that not everyone participated with the interactive poll.

Poll Results from Webinar

Q1: In what capacity are you attending today's session?

Options	No. of respondents
Resident	1
Community group	2
Planning agent	1
Developer	0
Other local authority	2
Other	1
Total	8

Q2: How many homes should we plan for per year?

Options	No. of respondents
699	0
877	2
735	3
800	2
Total	7

Q3: Where developments have limited funds to meet policy expectations, what should have the greatest priority?

Options	No. of respondents
Affordable Housing	2
Net-zero and sustainability	1
Biodiversity	0
Infrastructure	4
Total	7

Q4: Should Reading adopt a presumption against demolition?

Options	No. of respondents
Yes	6
No	0
Unsure	3
Total	9

Q. 5: What level of biodiversity net-gain should we be planning for?

Options	No. of respondents
Do not update the policy or take into account the 10% BNG requirements	1
Require an on-site BNG requirement of 10% (proposed approach)	2
Increase the on-site BNG requirement to 20%	5
Total	8

Question and Answer Discussion from Webinar

Q no.	Question	RBC Officer Answer
1	One site which needs to be included is the derelict site (empty for 20+ years) on the junction of Crown Street and Southampton Street., Katesgrove. It would provide affordable housing close to the town centre	Site is within existing plan as an allocation (reference CR14j) and the intent is for this site to be carried forward into the update.
2	The LPR refers to the call for sites exercise (CFS) in some instances. Are the CFS responses available for review please?	The Council had not initially planned to publish the full information provided through the call for sites process. Following this question, the Council wrote to those who had put a site forward asking whether there were any concerns with publishing the information in full. Although the majority of those who responded had no issue with this, there was still a significant minority who wanted to keep the information confidential. As a result of this, it has been decided that publishing partial information on only selected sites would not be helpful or equitable, and therefore it is not intended to make this information public from any site.
3	Pending the production of a Design "thingy" for Reading how do we progress to improve the quality of designs in the meantime. Back to building beautiful but..	Production of local design codes will require some resourcing and community involvement before it becomes a tool that officers can use. In the meantime, to focus on Policy CC7 and ensure it is worded as concisely as possible. Gov has also published local national model design codes and a national design guide which has some policy weight as it is referenced in the NPPF. To draw upon this until we have our own design codes.
4	We (REDA) have been reviewing the content of the 10 yr old Reading 2050 strategy - will this be woven through the updated plan	Subject to timings and when the review becomes available. Will take into account anything that can be fed into our final draft plan.
5	Will any other form of consultation responses be permitted other than individual comments in response to the questions in the consultation document?	Responses are welcome via the questionnaire, but you can also send comments in writing via email or in post alternatively.
6	There seems to be increasing pressure on Conservation Areas so can you update appraisals particularly those that are way out of date. Cost is an issue but	Appraisals are led by the CAAC and RBC are somewhat reliant on their input due to budget and resource constraints. We will look to update appraisals as we can but unlikely to have all of them updated in the immediate future.

7	So where does Heritage fit in all this. Any chance of Heritage Led "development" rather than brash new?	Existing heritage policies not viewed as requiring updating, and there is an existing policy about new development in a historic context. However, design codes will feed into heritage and the planning team are keen to see heritage reflected in new developments.
8	When is technical info referred to, that will support RBC's approach to housing numbers likely to be available for external review?	Date TBC, February at the earliest. Keen for results to be published during this consultation but may not be likely. Will make this available once it is ready.
9	Do the Plan updates include sites now "released" by PDR review...	Not likely to add these sites in the plan, to be reviewed on a case by case basis.
10	Thinking about infrastructure and Doctors Surgeries. So the proposal for one on the Battle Site was apparently turned down by the Berks Health. However the surgeries we worked with at WH for the Pandemic exposed the massive gap...No one wants to provide buildings yet they are all in old buildings in the town centre... the NHS are pressing surgeries to modernise and yet where is the identification of sites. How are you engaging with the surgeries who are under capacity stress?	NHS contacts to provide us with more detailed information about which sites are in need of an update and specific costs. This will give officers a tool that they can take to developers. All set out within IDP. Looking for additional capacity at existing surgeries associated with development and reconfiguration/relocation for existing sites that are not fit for purpose, resulting in fewer, larger, fit for purpose facilities. Working to get fully fitted facilities on new developments and larger hubs located throughout the borough. Difficult to engage on this topic, the Integrated Care Board emphasise that GP practices are individual businesses with particular circumstances and aspirations which makes it difficult to plan strategically. Will continue to have conversations through the Integrated Care Board.
11	Ease of access to central and other facilities have reduced seriously over recent years. Will you be reviewing RBC's attitude to this?	Question owner to email question directly to us so we can respond in more detail separately, as it is not clear what this is in reference to.
12	Any issues on educational capacity?	An identified need around special educational needs. Addressed in more detail within the planned document and Infrastructure Delivery Plan.

Appendix 12: Consultation Responses

The following pages list each response to the online questionnaire and representations submitted via email/post. Many of the comments have been summarised. It also includes the officer response to these comments. This Statement of Consultation has excluded submitted comments which effectively contained no information.

Generally, this appendix is categorised such that each table corresponds with the consultation questions (1-83) as set out within the Scope and Content document in a chronological order. Where additional representations have been submitted via email or post, these may not be explicitly in response to the specific consultation questions provided within the Scope and Content document and have therefore been documented in a separate table, albeit directly beneath those which provide a direct response to the questions from the Scope and Content document, so that the topic/policy area is still broadly categorised together as one reads through. A table at the beginning of this section contains general comments that do not relate to any specific topic, question or policy, which were received by email/post.

General comments submitted via email/post which do not relate to a specific policy or question

Respondent name	Comments	RBC Officer Response
Canal and River Trust	The trust have reviewed the document/policies contained within the document and based on the information available we have no comment to make at this time. Please continue to consult us as the review continues.	Answer is noted. No changes required.
James Ford	I've not got the time to read through thousands of pages of documentation to answer properly. All the while the work & investment leads to future proof progress I guess no-one can really speak against it. We just need to let go of our conservative bias & take the choices to fix our antiquated current holdings into something fit for the next generation(s).	Do not agree. No change needed. The LPPU document is 136 pages long and an extensive public consultation has taken place. The local planning authority has a legal duty to consider any representation submitted. The Local Plan will be scrutinised by an independent planning inspector to ensure it is sound.
Mark Treder	It is pointless preparing or commenting on a local plan, when you are so keen to discard it when a developer submits a proposal to build an extensive housing on land specified to remain green, as has happened in the most recent plan in the case of Reading Golf Course. All that time and effort wasted and several councillors on the planning committee are left with no credibility anymore (e.g. Page, Ennis, etc)	No change needed. The allocation for the Reading Golf course is not relevant to the LPPU as permission has already been granted.
Margaret Ormonde	I have only commented on one specific point. I do have interests in climate change/ biodiversity/ sustainable transport etc, but without in-depth knowledge it would be impossible to answer in a meaningful way.	Answer is noted. No changes needed. Additional information on these subjects can be found within the LPPU document.
ICB	<p>Public Health England (PHE) has published a Guide for local authority public health and planning teams related to Health Impact Assessment in spatial planning dated October 2020.⁸ The Guide clearly sets out that the <i>intention to use an Health Impact Assessment should be determined early in the planning process.</i></p> <p>The ICB considers that the Council should make use of this opportunity to include the requirement of an Health Impact Assessment (HIA) in all forthcoming major planning applications or applications which will have significant impact on healthcare, such as accommodation for vulnerable people. This is in line with paragraph 135 of the NPPF. Relevant consultees, including the ICB should be formally consulted in those applications. The ICB has the following recommendation for the wording a new policy for an Health Impact Assessment:</p> <p><i>Health Impact Assessment</i> <i>A Health Impact Assessment (HIA) is required to be submitted as part of the planning application for major development proposals or development proposals for accommodation for vulnerable people:</i> <i>The analysis within the submitted HIA should be of a sufficient level of detail to allow the Council to assess the potential impacts of the development on the health environment and residents. The HIA should, but not limited to, include the following:</i></p> <ul style="list-style-type: none"> <i>Description of the baseline of a development proposal;</i> <i>Identification of relevant population groups that could be affected by the development and associated health issues, inequalities and priorities in the area, which should be supported with appropriate evidence/data;</i> <i>Assessment of the impacts of the proposal on the identified population groups and local health issues, inequalities and priorities, including any potential positive and negative impacts, along with any mitigation measures incorporated into the design to reduce identified negative outcomes; and</i> <i>Details of monitoring which will be undertaken in relation to the proposed mitigation to be implemented.</i> 	Agreed. The pre-submission draft includes a policy with regard to Health Impact Assessment.

	<p><i>The level of details should be proportionate to the development and agreed with the Council. Applicants should refer to the additional information and guidance contained in the Public Health England’s Guide related to Health Impact Assessment in Spatial Planning dated October 2020.</i></p> <p>The ICB has the following recommendation for the wording of the supporting paragraphs to Policy CC10:</p> <p><i>Social objective to support strong, vibrant and healthy communities is one of the three overarching objectives of the planning system identified in the NPPF to achieve sustainable development. This is also an overarching vision set out in this Local Plan. Therefore, it is vital to plan for and design a healthier built environment. To ensure development in Reading promotes and contributes to this, development proposals should consider health outcomes from the outset.</i></p> <p><i>Applications for major development proposals and development proposals which will have significant impacts are expected to undertake and submit a Health Impact Assessment (HIA) in support of their application. The scope of assessment for the HIA will vary with the nature of the development. However, the structure of the HIA should follow the guidance set out in the Policy.</i></p> <p><i>The HIA should include relevant contextual analysis to help inform an assessment of impacts on the health environment. This will include a description of the physical characteristics of the development site and its surrounding area. The assessment should also identify the population group and the area that will be affected by the development.</i></p> <p><i>The HIA should also include an assessment identifying how the proposed development will impact upon the identified population groups and the key health issues in the local area. The assessment should clearly set out how the development proposals address those identified issues. If negative or neutral impacts on health are identified, developers should seek to change to the design to avoid or reduce these impacts. Where mitigations are proposed, it is important that relevant consultees should be informed at an early stage to ensure the effectiveness of those mitigations and how these will be monitored going forward.</i></p> <p><i>Developers will be expected to be responsible for the undertaking of the HIA. If the Council is satisfied that mitigations are required set out in the assessment, those mitigations will be secured by the mean of planning conditions of Section 106 planning obligations, wherever it is relevant.</i></p>	
<p>Rushmoor Borough Council</p>	<p>We have no comments to make at this time, but please continue to notify us of future consultations.</p>	<p>Answer is noted. No changes needed.</p>
<p>Kennet & Avon Canal Trust</p>	<p>The waterways in the town centre and Newtown have gradually changed from a “back door” aspect to a significant part of the urban scene. Commercial and residential development now faces the canal and waterside paths are well used by pedestrians and cyclists for local travel and for leisure trips. This transformation is now taken for granted but care is needed to ensure that development and redevelopment continue to maintain and enhance this positive approach.</p> <p>Outside the town centre the canal provides a “green finger” into the town with a surprisingly non-urban aspect and is the largest of the few open areas of the Borough for informal leisure use.</p> <p>Industrial development on Island Road (Amazon etc) has slightly reduced this aspect but a balance remains. Further development on Island Road and the nearby landfill sites is unwelcome if it detracts from the open aspect and amenity value of the waterway areas.</p> <p>The Holy Brook parallels the canal from Theale to Reading Abbey. It provides a pleasant waterside walkway close to nearby housing but is largely unknown, even to many local residents. Limited improvement and promotion of the Holy Brook path as a pedestrian route is recommended.</p>	<p>Answer is noted. The Council recognises the importance of these spaces for their value to the environment and Reading’s residents. The Local Plan Partial Update is not considering changes to EN11: Waterspaces because this policy is up-to-date. The concerns raised with regard to access and footpaths are acknowledged and existing policies within the Local Plan aim to address these concerns. Short-term moorings are not within the scope of the Local Plan.</p>

	<p>Reading Borough Council has successfully removed long-term boat mooring from the much of the town centre but in doing so has (inadvertently?) discouraged short-term mooring by holiday and leisure boats. Mooring signs emphasise financial penalties. “No return within X days” conditions have resulted in boat hire companies advising hirers not to stop in Reading as they have no idea if the previous hirer stopped.</p> <p>Reading town centre is the only location on the Kennet and Avon Canal where mooring charges apply. Almost all other locations on the national CRT system have free towpath mooring. Mooring charges are applied on Environment Agency waterways.</p> <p>The ABC boat hire company (one of the UK canals largest) has a base at Aldermaston with around 1,000 boat hire weeks a year. Around half of one week hires pass through Reading on their outward trip to Thames destinations such as Windsor or Oxford and again on their return. The potential revenue to Reading shops and restaurants is considerable but, although Queens Road and Chestnut Walk are suitable for short term mooring and close to the town centre, hirers are advised not to stop. On the Thames, short-term moorings for hire and private boats in Reading and Caversham are few.</p> <p>Most Thames boats could reach Reading town centre (their EA licence is valid to Queens Road) but few do. Signage and attractive mooring facilities (e.g. by the Abbey Ruins) could encourage them to do so.</p> <p>Basic mooring facilities involve a safe place with adequate water depth and bollards or rings to tie onto. Lighting of the access area is also useful. Water supply is a very useful benefit. Information boards giving details of local businesses and attractions are also beneficial.</p> <p>As recognised in RBC reports, access between the waterways and residential areas to the north is poor. Burghfield Road has high traffic levels but no pedestrian footways. The narrow bridge over the Holy Brook and railway (within the Borough) and the remainder of the route to the canal (mainly in West Berkshire) are hazardous for pedestrians.</p> <p>Footpath 05 from Circuit Lane to Southcote Lock is in reasonable condition. It is well used by pedestrians but not ideal for cyclists.</p> <p>Footpath 06 from Coley to Fobney Lock is poorly defined, not maintained and sometimes impassable without waterproof boots.</p> <p>Footpath links between Green Park and the canal are also poor, although use of some informal routes occurs.</p>	
RBWM	<p>The Council does not have any substantive comments to make at this stage. However, we support the objective of introducing appropriate Climate Change and Affordable Housing policies through this LPPU.</p>	<p>Answer is noted. No changes needed.</p>
MOD	<p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.</p> <p>See Paragraph 101 of the NPPF (December 2023).</p> <p>Copies of these relevant plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.</p> <p>The MOD have an interest within the Reading Borough Council's LPPU on Scope and Content authority area in a new technical asset known as the Central Wide Area Multilateration (WAM) Network, which contributes to aviation safety by feeding into the air traffic management system in the Central areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Reading Borough Council's LPPU area of interest.</p>	<p>Answer is noted. The MOD Safeguarding Team have been added as a consultation body for the LPPU.</p> <p>The MOD safeguarding team have also been added as a consultee for relevant future planning applications.</p>

	<p>The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.</p> <p>To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of the technical safeguarding zone is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.</p> <ul style="list-style-type: none"> • Technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to provide large expanses of metal at height, for example in the case of a wind turbine or a solar PV system mounted on a roof. <p>The Safeguarding map associated with the Central WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern. Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.</p> <p>In addition to the safeguarding zone identified, the MOD may also have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:</p> <ul style="list-style-type: none"> • Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers. • Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government’s online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more; and, • Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft. • Development, regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or property. <p>The MOD Safeguarding team would welcome being listed as a consultation body of the Reading Borough Council’s LPPU and will provide representations as and when appropriate in the drafting and consultation stages.</p>	
<p>Stantec (OBO UoR)</p>	<p>Although policy H12 ‘Student accommodation’ is not proposed to be updated, the University would highlight that the supporting text for these policies (paragraphs 4.4.97 – 4.4.102) may need to be amended to reflect up to date figures and plans relating to student numbers and the University’s plans for growth. As set out above, this information is being updated by the University and would be discussed with the Council going forward to assist it with the drafting of the updated policy for the next stage of consultation on the Local Plan.</p>	<p>Changes agreed. Text has been updated to reflect latest figures and plans on student numbers.</p>

Bracknell Forest Council	At this stage, we have no specific comments on the proposed approach to retail and leisure, gypsy and travellers or transport and infrastructure as either further evidence seems to be required or there appear to be no cross-boundary implications. However, we reserve the right to make further comments on these topics as matters progress.	Answer is noted. No changes required.
Aubrey Blazey	Anyone who has read the ipcc reports is actually terrified of what will happen with mass migrations as much of the world becomes too hot to grow food, and the resulting break down in civil society - i didn't see much covering this in the updates? will you be creating safe places?	No changes proposed. Many listed concerns are beyond the scope of planning policy. However policies such as CC2 are to be updated to address the climate emergency. Policy CC7 (amongst others e.g. CC8) discusses the requirement to create safe spaces.
M Langshaw	Great to update the Local Plan, good to have a Local Design Guide as soon as possible, important to try to keep Reading as a cohesive and attractive town - thank you!	Answer is noted. No changes proposed.
Graham Bates	As stated earlier, this consultation carries too much detail for residents to consider at once. I am submitting now, with most unanswered, in order to hit the deadline and that should not be taken as being from a lack of concern or interest.	Answer is noted. No changes required.
Gladman	<p>Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG), it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, the councils must be able to demonstrate that they have engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs.</p> <p>Historically, the Berkshire authorities have undertaken joint work, such as the Berkshire Strategic Housing Market Assessment, and set out arrangements for addressing unmet development needs within the Western Berkshire Housing Market Area (HMA), as set out in the West of Berkshire Spatial Planning Framework. However, given the constraints to development and plan-making context in the HMA, which will be explored in more detail in this representation and outlined in Appendix 2, it is considered that Reading must engage in proactive communication and engagement with South Oxfordshire.</p> <p>South Oxfordshire and Vale of White Horse are currently preparing a new Joint Local Plan. The South Oxfordshire and Vale of White Horse District Council's Joint Local Plan 2041 Issues consultation (May 2022) was supported by a 'Duty to Co-operate Scoping Document' which sets out which stakeholders the authorities must engage with through the plan-making process alongside which issues should be considered. However, an updated Duty to Co-operate Statement (January 2024) makes no reference to the plan-making process being undertaken by Reading, engagement with the authority and does not mention any consideration of the boroughs' housing need and any potential unmet needs.</p> <p>At present, likely due to the Council being at a very early stage of the plan-making process, no Duty to Cooperate Statement(s) or Statement(s) of Common Ground have been published alongside the current consultation. Unmet housing need extends beyond numbers and beyond the confines of the plan-making process; it has real life implications for households who cannot access housing in the market, either to rent or buy, simply because not enough homes are being built. There is, therefore, a pressing and urgent need at this early stage in the plan-making process to develop an appropriate strategy for considering and addressing Reading's unmet housing need up to 2041 and beyond, including an agreed upon strategy for the distribution and delivery of all unmet housing needs.</p> <p>A vision document promoting the sustainable development opportunity North of Reading accompanies this representation at Appendix 1 (document titled 'Play Hatch & Emmer Green, Creating sustainable communities, A vision for land north of Reading' which was also submitted alongside representation).</p> <p>A Future Housing Needs Assessment has been attached to the representation (Appendix 2). The report concludes that: 'This Story Map has set out to highlight the increasing housing delivery pressures facing the Western Berkshire HMA and notably in the Reading Borough between 2022 and 2050. Analysis of local plan documents, SHLAAs, HELAAs and housing land supply</p>	<p>Noted. No change needed.</p> <p>The Council is aware of its responsibilities under the duty to co-operate and has been fulfilling these as regards South Oxfordshire, as will be detailed in the Duty to Co-operate Statement. As set out in the Local Plan Partial Update, the Council does not consider that it has unmet housing needs, but nonetheless the Councils have co-operated on any potential unmet needs, including a formal duty to co-operate request.</p>

	<p>statements a theoretical housing supply up to 2039 has been derived for each authority area, before a total figure calculated across the HMA. Across the HMA there is projected to be a potential supply of between 44,176 and 54,029 homes over the period 2022-2039, with a further 23,083 to 23,936 homes to be identified between 2039-2050. Given historic annual delivery figures the above are considered to be optimistic, particularly given the context of the significant constraints affecting the HMA, including but not limited to, flooding, nuclear installation consultation zones and a tight urban boundary mean that it is unlikely that Reading will be able to deliver their own full housing needs up to 2050. Therefore, and in conclusion, the ability of Western Berkshire HMA to address the identified housing needs to 2050 is likely to be problematic. The authorities comprising the HMA must look to address the arising issues now to ensure future housing delivery meets needs through taking the opportunity to look beyond their administrative boundaries and engaging with neighbouring areas. Indeed, the emerging South Oxfordshire and Vale of White Horse Joint Local Plan presents a deliverable and suitable opportunity to ensure strategic needs are met in functional locations and outside of significant constraints.'</p>	
<p>Ian Gordon</p>	<p>I should say that on a (not too considered) first reading, the list of nominated sites in Appendix 2 seemed rather reassuring for Redlands residents - in its omission of the "elephant in our room", namely the Reading School/Jansons scheme for development of the Morgan Road playing field. A glossy and specific presentation of this had been circulated to councillors last June - with officer consultations to follow in the summer - though (still) not more publicly announced.</p> <p>What I had failed to understand (as others might also have) was that the council's "Call for Sites" was a purely voluntary survey, to which developers/landowners could respond or not, depending on the balance of advantage they saw to their own (economic) position. Specifically, I now see, between:</p> <ul style="list-style-type: none"> • the positive effects of having their potential development recognised by RBC/the planners as a contribution to required housing supply or economic growth; and • the risk of negative effects from the responses of residents to the consultation invitation for the developers' suggested project. <p>In the case of the Morgan Road playing field scheme, it seems that - unless it has been suddenly/silently abandoned - its proponents have opted (rather cynically) for securing recognition via a <i>private</i> marketing initiative, while avoiding the risk of <i>public</i> consultation by not responding to RBC's Call for Sites.</p> <p>Unless I am totally wrong, and the School/Jansons have actually given up on their scheme, I think this evasion of the proper procedures for public consultation on the Plan update needs to be urgently corrected. Specifically I would suggest that the Planning Policy Team should:</p> <ul style="list-style-type: none"> • publish/publicise online a Morgan Road addition to the Appendix 2 list of sites which have been "put forward for consideration as a development allocation" - as the heading to that appendix puts it, and which surely applies to this case (just not via the expected channel) - using the material provided in the developer's June 2024 booklet to fill in the basic information and the plan team's judgements about alternatives etc. as presented for the other potential sites; and • advertise an extended deadline for consultees to response to this element in the (extended) draft. <p>I understand that this may sound a little laborious and involve a slight bending of procedures. But only, I would suggest, because in this case the developers have gone out of their way to obstruct the underlying participatory intentions/expectations of the consultation procedure for a draft Plan (partial) update.</p>	<p>Answer is noted. No changes proposed. All sites put forward for developers for inclusion within the LPPU are set out at Appendix 2. Should the site come forward for development via a planning application, this would undergo the full public consultation process.</p>
<p>Environment Agency</p>	<p>[We] advise that the following policies are updated:</p> <p>EN11: Waterspaces The policy in the adopted local plan says: 'Be set at least ten metres back from the watercourse wherever practicable and appropriate to protect its biodiversity significance'. We recommend a stronger wording and suggest; 'where practicable' is deleted and replaced with 'must' or 'should'. The policy can then highlight that where a/the site is constrained there can be exceptions however it is important to emphasise that the requirement is for a 10-metre buffer in the first instance.</p>	<p>No change proposed to EN11. It is considered that "wherever practicable" has the same effect in practice as "must" or "should."</p> <p>No change proposed to 4.2.50. We do not consider that specification of "ecological" buffer would result in materially different outcomes. Each site is subject to consideration on a case-by-case</p>

<p>Section 4.2.50 states ‘Additionally, where a watercourse runs through a proposed development, a buffer shall be provided on both banks. There should be a longterm landscape and ecological management plan for this buffer’. We recommend the replacement of ‘a buffer’ to ‘an ecological buffer’ to ensure the buffer zones are ecologically enhancing and increases biodiversity and protects species and that is it managed appropriately to maintain these ecological features.</p> <p>Section 4.2.51 states ‘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’. This could include a hierarchy of options. For example, removing the barrier is what we recommend however where this is not possible, a naturalised bypass channel should be proposed over a technical pass, or similar which should be last option.</p> <p>It would be useful to include a paragraph about biodiversity net gain in this policy as well. The paragraph could highlight that if there is a watercourse or a river and a riparian zone within the site boundary, then the watercourse part of the statutory biodiversity net gain metric 4.0 must be completed and an increase of at least 10% biodiversity net gain must be provided. It must also be accompanied with appropriate literature to show how the enhancement will be achieved and how it will be secured for 30 years.</p> <p>Policy EN16 (Pollution & Water Resources) In terms of contaminated land we suggest that the policy is amended to include the highlighted text to strengthen the policy.</p> <p><i>‘Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution; where it would result in no deterioration in, or ideally enhance, land quality, groundwater and surface water quality; and where adequate water resources, sewerage and wastewater treatment infrastructure will be in place to support the proposed development prior to occupation. Proposals for development that are sensitive to the effects of noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution. Development will only be permitted on land affected by contamination where it is demonstrated that the contamination (of land and/or controlled waters) and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.’</i></p> <p>In terms of highlighting the commitment to protecting the water environment from development, the Policy states that ‘development will only be permitted where it would not lead to a deterioration in surface water quality, and where adequate sewage and wastewater treatment infrastructure will be in place to support the new development’.</p> <p>This is currently not the case with Reading Sewage Treatment Works (STW). Our main concern is with the performance and compliance of Reading STW. Actions have been identified to resolve those issues, and we expect those to be in place before the STW is put under more pressure from additional development. Similarly, any sewerage networks improvements that have been identified need to be completed as soon as practicable.</p> <p>It is assumed that the wastewater flows from the additional proposed development will flow to Reading STW. If any development on the allocated site is to be served by a STW other than Reading STW, please inform the Environment Agency as soon as possible so we can assess the impacts. We have provided comments regarding the Reading STW in section 2.2 of our comments.</p> <p>Policy EN18 Flooding and Drainage Since the local plan was adopted there have been changes in the national planning policy (especially the flood risk section of the Planning Practice Guidance 2022) that should be reflected in the Plan. In 2022 the climate change allowances were revised giving a range of allowances to be used based on flood zone and vulnerability, so we recommend this section of the policy to be updated.</p>	<p>basis and ecological management is given due attention (particularly in light of new biodiversity net gain requirements).</p> <p>No change proposed to 4.2.51. The suggested level of detail is not necessary within the Local Plan itself.</p> <p>No change proposed to include an additional policy on biodiversity net gain within Policy EN11. These matters are sufficiently addressed by Policy EN12.</p> <p>No change proposed to EN16. It is unclear what effect the very minor suggested changes would have, if any. RBC has held discussions with Thames Water to address concerns about Reading Sewerage Treatment Works. Thames Water stated that they are currently assessing design solutions to accommodate growth which will be delivered during the next Asset Management Plan Period (2025 – 2030). Reading Borough Council will continue to liaise with Thames Water to ensure capacity for development within the plan period.</p> <p>Change proposed to EN18 to account for changes to the PPG.</p> <p>No change proposed to H13. It is not considered that the suggested wording is necessary as the policy already contains reference to “ national and local policy on flood risk.”</p>
---	--

	<p>Similarly, the definition of Flood Zone 3b (the functional floodplain) has been updated so it is now considered as land having a 3.3% or greater annual probability of flooding. This extent is included in our latest modelling for the area. These changes will need to be updated in the SFRA.</p> <p>It is noted that in the adopted local plan the text box for the policy has limited information with additional detail in the supporting text such as the requirements for when an FRA will be needed. We recommend the supporting text is added to the EN18 policy text box to make the policy clearer and further detail is added discussing what development is and is not appropriate in the functional floodplain and safeguarding areas of floodplain storage. We are happy to work with you on what the wording of the policy.</p> <p>We refer you to the following guidance documents for further information on Climate change allowances: Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk) and Flood Risk Management Plans for Reading: Reading (Town) – Flood Plan Explorer (data.gov.uk)</p> <p>Policy H13 Provision for Gypsies and Travellers The policy in the adopted local plan states in bullet point i) 'Have safe and convenient access onto the highway network'. We recommend this is amended to read; 'Have safe and convenient access onto the highway network and to an area of safe refuge in the event of a flood.'</p>	
--	---	--

Chapter 2: Important policy background and evidence

Q. 1: Do you agree with the changes to the sustainability objectives to be used in carrying out sustainability appraisal?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Henry Wright	Y	Should also include need to reduce homelessness and provide housing for key workers - i.e. maximise affordable housing provision.	Noted, however no changes proposed. The need to create a more equitable town is already covered, for example, at objective 19 which seeks to reduce deprivation and inequality between communities. Separately, an updated Housing Needs Assessment has been produced to ascertain the current levels of affordable housing need within the borough. All development must adhere to policy H3 requirements on affordable housing.
Mark Treder	Other	[Directed to final comment] It is pointless preparing or commenting on a local plan, when you are so keen to discard it when a developer submits a proposal to build an extensive housing on land specified to remain green, as has happened in the most recent plan in the case of Reading Golf Course. All that time and effort wasted and several councillors on the planning committee are left with no credibility any more (e.g. Page, Ennis, etc)	See officer response to Q.1
Debbie Sadler	N	"To address the climate emergency and its impact through minimising CO2 emissions and other greenhouse gases"	Change agreed. Objective 1 updated to refer to addressing the impact of the climate emergency.
Reading Climate Action Network	Other	I believe that Objective 1 is phrased in too general a way and should be made more specific and measurable by reference to the policies that will underpin the Objective. This would help avoid developers claiming to meet RBC Objectives which are too woolly or ambiguous. For example: Objective 1: To address the climate emergency by minimising the emissions of CO2 and other greenhouse gases, by ensuring that development adheres to the specific policies set out in the Local Plan. Objective 13 deals with housing but is missing a reference to net zero standards for new housing Also Objective 18 could be developed: Objective 18: Facilitate sustainable economic growth and regeneration that provides employment opportunities for all and supports a successful, competitive, inclusive and balanced local economy that meets the needs of the area and the Objectives of the Local Plan, and enables the transition to a low carbon economy, including through investment in the necessary skills and services.	Answer is noted. Partially agreed. Objective 1 has been amended to make reference to development. The word 'sustainable' has been added to Objective 13. Objective 18 has been expanded to refer to the transitioning to a low carbon economy. However, it is not considered necessary to be so prescriptive through referring to investment in skills/services.
Anthony Acka'a	Y	I agree with everything stated and oppose nothing. Very honorable goals	Answer is noted.
Sport England	Y	The changes are logical and appear to reflect current best practise.	Answer is noted. No changes needed.
Reading Friends of the Earth	Y	Welcome changes to Objectives 1 and 14	Answer is noted. No changes needed.
Historic England	Y	Yes, though I suggest an additional change to consider: "Value, protect and, where possible, enhance the historic environment and the heritage assets therein and the contribution that they make to society, and the environment and the economy." This connects also with the 6th objective of the local plan.	Change agreed. Objective no. 10 has been amended to include contributions to the economy.

Stantec (OBO UoR)	Y	<p>The University is fully supportive of the principle of incorporating addressing the climate emergency into objective 1 of the sustainability objectives in the Sustainability Appraisal Framework.</p> <p>The amendment to Objective 1 to address the climate emergency is in line with many Local Planning Authorities in the UK. It is also in line with the UK's legislative requirement to achieve net zero carbon emissions by 2050 where the driver is to limit global warming to 1.5oC, per the Paris Agreement. This objective is supported by the University's own Net Zero Carbon Plan 2021 to 2030 with a commitment to become net zero by 2030.</p> <p>In addition, the University's academic work in the field of climate-change research is considered world leading, including providing lead authors for the 6th Assessment Report of the Intergovernmental Panel on Climate Change (IPCC). The University understands and acknowledges that there is an urgent need for sustained and substantial action to both mitigate the causes of climate change and adapt to the consequences of a changing climate.</p>	Answer is noted. No changes required.
Tricia Marcouse		Objective 8 seems a bit restrictive. Why only for internationally important wildlife sites when these are not really relevant to Reading. This should be extended, preferably to all areas of biodiversity interest identified in the current local plan, but definitely to whs, Local nature reserves AND any corridors identified as important in the upcoming nature recovery strategy for Berkshire.	No changes proposed. Objective 8 seeks to address the screening stage of the Habitat Regulations Assessment, which is a statutory requirement. This is explained further within the Sustainability Appraisal itself that has been published. Objective 7 protects the likes of wildlife, habitat, geology, and ecological networks.
The Woodland Trust	Y	Yes – particularly Objective 1, to be more proactive in response to the climate emergency	No changes proposed. Objective 1 has been expanded to refer to addressing the impact of the climate emergency and sets out how this will be achieved.
M Langshaw	Y	They accord with 2023/4 life experience	Answer is noted. No changes proposed.
Graham Bates	Y	The changes are right but objectives will not be attained with the levels of development proposed.	No changes proposed. Policy updates elsewhere in the LPPU address the ways in which new developments must specifically adapt to the effects of climate change.

Additional representations submitted via email regarding the sustainability objectives

Respondent name	Comments	RBC Officer Response
Berkshire Gardens Trust	We support the objectives as set out and also consider that there is a high degree of overlap between objectives so that in achieving or aiming for one, much can be done to achieve other objectives. We urge that they should not therefore be considered in isolation and achieved through inter-departmental working.	Answer is noted. No changes proposed.
ICB	<p>The partial update is intending to update the objectives of the Sustainability Appraisal Framework as there is an intention to make sure they are in line with priorities in 2023. The document does not elaborate further what are the priorities in 2023. Objectives 11 and 15 are related to primary healthcare. While the ICB has no comments to make related to objective 11, the ICB considers that the wording of objective 15 should be revised.</p> <p>The original wording of objective 15 is to <i>“Ensure good physical access for all to essential services and facilities, including healthcare.”</i> While the ICB fully supports a good physical access for all to healthcare facilities is needed, it is important to ensure that there are also adequate services and facilities to be provided. The ICB has the following recommendation on the wording of Objective 15:</p> <p><i>Ensure all essential services and facilities, including healthcare to be physically accessible and adequate for all.</i></p>	Agreed. Objective 15 has been updated to make clear reference to the provision of adequate services.

Chapter 3: Vision, objectives and spatial strategy

Q. 2: How should the Climate Emergency be reflected in the vision and objectives?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
James Ford	N/A	Not much point investing in areas that will be under water once the sea levels rise.	Do not agree, no change proposed. RBC have set a target of net zero carbon Reading by 2030 to tackle climate change. It is acknowledged that it may be challenging to meet this target without plans and strategies in place to help achieve it, and therefore, a number of policies within the local plan are to be updated to ensure the highest level of sustainability possible. The 2030 target, as well as the Climate Emergency declaration is to be central to both the vision and objectives of the Local Plan to address the ever-growing impacts of climate change.
Adam Boulding	N/A	i think it needs to be stricter and clearer, less "guidelines" and considerations and more hard lines and exact "no go's" too many of the polices ask developers or applicants and the council to "think" about the issue but do not stop this being regularly overlooked and over ruled due to "need" - it makes it somewhat useless	Do not agree, no changes proposed. The vision is the starting point for the LPPU and will inform specific policies that must be adhered to.
Henry Wright	N/A	Reducing the level of car dependency within Reading as a whole through sustainable energy on apartment building roofs, communal heating schemes and most importantly trees and cycle lanes to join new developments with town centre. Reduction in town centre traffic and pollution should be a key objective.	Agree. Minor change proposed. The existing vision and objectives already reflect these principles, but the importance of planning for climate change by employing these measures has been strengthened throughout the document during the Local Plan review.
Christian Harris	N/A	Use hydro electric from readings weirs. Do not build more flats but houses with gardens	No change proposed. It is not considered appropriate to reference specific policies within the vision and objectives as this section is intended to state objectives for our overall approach, rather than specific policy measures. In addition, the source of energy is generally beyond the remit of planning. However, updates to policy CC4 provides more detail on decentralised energy. Due to the urban nature of the borough, high-density development is often required to suit the needs of the residents, as well as to meet housing targets. Adopted Policy H10 sets out requirements for private and communal outdoor space for dwellings.
Mark Treder	N/A	No point if you are going to ignore the impact of developments on climate anyway	Do not agree, no changes needed. RBC takes the climate emergency extremely seriously and the LPPU is being updated to ensure that the Climate Emergency is central to both the vision and objectives of the Local Plan.

Debbie Sadler	N/A	acknowledgement of its impact and pragmatic and enterprising ways of mitigating its impact. Use of local suppliers/firms to minimise transport and CO2 emissions with added benefit of rejuvenating the local economy. Commissioning of companies with a proven track record of green credentials to encourage compliance of green agenda throughout chain	<p>No change proposed. It is not considered appropriate to reference specific measures within the vision and objectives as this section is intended to state objectives for our overall approach, rather than specific policy measures.</p> <p>The appointment of contractors is beyond the scope of planning and this inclusion would not be appropriate within the vision/objectives as this section is intended to state objectives for our overall approach, rather than specific policy measures.</p>
Reading Climate Action Network	N/A	There should a statement in the vision and objectives section to the effect that the Reading Climate Change Strategy (as updated from time to time) has been developed in response to the Climate Emergency and is one of the key documents which underpin the Local Plan. As such the latest version should be consulted in conjunction with the Local Plan in considering any developments (an Updated Strategy is due in 2024/25 which will unfortunately be after the adoption of this Partial Plan Update). The overall delivery of the Local Plan should at all times be driven by and in accordance with the Climate Change Strategy.	Agree. Change proposed to increase cross-references to the CCS and emphasise its importance.
Paul Oliver James Melville	N/A	IS THERE A CLIMATE EMERGENCY OR A CYCLICAL CHANGE IN THE CLOMATE DUE TO WEATER SYSTEMS.	RBC have set a target of a net zero carbon Reading by 2030 to tackle the effects of climate change, which has already been felt both globally and locally. The 2030 target, as well as the Climate Emergency as declared by Reading in February 2019, is proposed to be central to both the vision and objectives of the Local Plan to address the ever-growing impacts of climate change.
Anthony Acka'a	N/A	<p>Taking a more serious stance against personal vehicle usage such as ULEZ or a congestion charge, this will understandable be unpopular but if we let people always get what they want then net zero is impossible. Future generations will be grateful for the changes and will look at those who opposed it as backwards.</p> <p>Segregated cycle lanes and more bus lanes are important as they'll make sustainable methods of transportation faster and more attractive which will reduce carbon emissions.</p> <p>Don't be afraid to increase density as we don't have much space to build so we really need to build up more and be more lenient to how tall we allow new developments to be.</p>	<p>No change proposed. It is not considered appropriate to reference specific policies within the vision and objectives as this section is intended to state objectives for our overall approach, rather than specific policy measures.</p> <p>Notwithstanding, charges in relation to a vehicle's emissions is discussed within the Local Transport Plan (2040) and is not a planning consideration. The LPPU seeks to incorporate the revised objectives of the Transport Strategy and updates can be found within the transport section.</p> <p>Segregation of cycle lanes and bus lanes are addressed within the Transport Strategy (2040) does not fall within the remit of planning policy.</p> <p>Further information on density standards, which will be increased, can be found at policy H2.</p>

CADRA	N/A	We suggest a clear reference to the Sustainable Design and Construction policy (CC2) and the Climate Change Strategy (CC3), as updated.	No change proposed. It is not considered appropriate to reference specific policies within the vision and objectives as this section is intended to state objectives for our overall approach, rather than specific policy measures.
Natural England	N/A	The Vision and Objectives and spatial strategy should identify and promote the multifunctional benefits of good quality green and blue infrastructure including its important role to play in our urban and rural environments for improving health and wellbeing, air quality, nature recovery and resilience to and mitigation of climate change, along with addressing issues of social inequality and environmental decline.	Agree. Changes proposed.
Louise Acreman	N/A	I think addressing the climate emergency is very important	Noted. No changes needed.
Jane Scott	N/A	Protection of existing and creating more designated green spaces as 'lungs for the community' and maintaining safe space for wildlife. This helps to offset the damage to air pollution caused by our lifestyles in a pro active way.	No change proposed. It is not considered appropriate to reference specific policies within the vision and objectives as this section is intended to state objectives for our overall approach, rather than specific policy measures. In addition, policy EN7 already protects designated local green and public open spaces from development. In relation to undesignated open space, policy EN8 confirms that there will be a presumption in favour of its retention. Policy EN9 sets out requirements for new open space provision. Policy EN12 deals with protection of The Green Network and is being expanded to ensure that a 10% BNG is achieved for all new developments.
Sport England	N/A	This is difficult, but we would suggest by capturing best practice set out by Department for Levelling Up, Housing and Communities, and other government and specialist non-government departments, and tailoring them to meet the species of Reading.	No change proposed. It is not considered appropriate to reference specific actions within the vision and objectives as this section is intended to state objectives for our overall approach, rather than specific measures.
Jennifer Susan Cottee	N/A	I agree with including the phrase net zero, and the centrality of the climate emergency issue	Answer is noted. No changes needed.
Reading Friends of the Earth	N/A	Good to see Sections 3.2 and 3.3. Perhaps acknowledge that Reading's 2030 target is unlikely to be met in full but emphasise that rapid drops in local emissions by 2030 will be important progress in response to the emergency.	Answer is noted. No changes proposed.
Historic England	N/A	Historic England considers the global climate crisis is one of the most significant and fastest growing threats to people and their cultural heritage. Furthermore, we recognise that the historic environment sector has a role to play in tackling the climate crisis. I encourage the Council to recognise the positive ways in which the historic environment could contribute to climate change mitigation and adaptation within the plan and would happily discuss this further with you as required.	Noted. Change proposed to include specific information in the supporting text of CC2 and H5 to point applicants toward resources to guide mitigation and adaptation measures with regard to the historic environment.
Stantec (OBO UoR)	N/A	The University supports the proposed changes to the vision and objectives, which include the target for a net zero carbon Reading by 2030. The Reading Climate Change Partnership (of which both RBC and the University are members and Delivery Partners) have devised the Reading Climate Emergency Strategy 2020 - 20253 where the	Answer is noted. No changes needed.

		<p>scope includes net zero carbon dioxide emissions in 'the Reading area by 2030'. The Strategy highlights the need to remove virtually all fossil fuels from energy supply, and identifies five key priority areas for achieving that goal:</p> <ul style="list-style-type: none"> • Housing (retrofit and new build) • Renewable energy • Transport • Consumption and waste • Nature-based solutions <p>Further, the RBC Carbon Plan 2020 to 2025 includes a commitment to deliver an 85% reduction in the Council's emissions by 2025, with net zero by 2030. RBC are also responsible for delivering the 'Energy Efficiency in New Development' targets set out within the Reading Climate Emergency Strategy 2020 - 2025, along with establishing a retrofit programme for energy reduction and establishing retrofit design standards.</p> <p>Therefore, the inclusion of enhanced policies on sustainable design and construction, climate change adaptation, decentralised energy and new housing are aligned with the scope of RBC's Climate Emergency declaration and with carbon action plans set out at a city-level and Local Planning Authority (LPA) level.</p>	
Tricia Marcouse		<p>The vision and objectives need to be very clear that there are two missions for the local plan with relation to climate change. The first is reduction of emissions of greenhouse gases, which requires an enormous change in attitudes as well as planning policies, and the second is adaptation measures that will be essential whether or not Reading meets net zero targets in 2030. It's important that the two goals are separated so that adaptation measures can be deemed an ongoing issue, with potentially a need for amendment to the plan, no matter what happens to emissions both in Reading and internationally.</p> <p>It seems highly unlikely that Reading can hit zero carbon targets by 2030 without a huge change in central government policies and financial arrangements. This should be mentioned in the vision statement as it hugely affects costs of implementation and likely success.</p>	<p>Answer is noted. The Local Plan does attempt to separate the goals of reducing emissions and mitigating effects through adaptation. For instance, CC2: Sustainable Design and Construction is chiefly concerned with reducing emissions while CC3: Adaptation to Climate Change requires addressing issues such as overheating and flooding. RCB agrees that more leadership is required from central government and have responded to various national planning policy consultations to express these concerns.</p>
The Woodland Trust	N/A	By embedding climate as a theme throughout the plan, with end and interim targets to drive & measure action.	<p>Answer is noted. Sustainability policies are proposed to be significantly strengthened and climate embedded throughout the plan. Setting specific targets to drive and measure action is not within the scope of the Local Plan, but the Annual Monitoring Report does report on annual implementation, for example the proportion of homes built to a zero carbon standard.</p>
M Langshaw	N/A	It should be central.	Answer is noted. No changes needed.
Graham Bates	N/A	<p>No buildings less than 50 years old should be bulldozed unless unsafe. It is highly unsustainable for perfectly sound and relatively new buildings such as those in Napier Road and Vastern Road to be entirely redeveloped. Instead, they should be increased in size and added to if necessary but not excessively so that they become high-rises by default. More tower blocks cannot be allowed to turn the town further into a bleak cityscape beyond human scale.</p>	<p>No changes proposed. Such requirements would not be included within the overarching vision and objectives which are designed to be applicable to the plan in its entirety. Policies CC2, CC3, CC4 and H5 set out updated requirements relating to development to ensure climate targets are met.</p>

Additional representations on the Climate Emergency submitted separately within the questionnaire or via email:

Respondent name	Comments	RBC Officer Response
Debbie Sadler	<p>The climate emergency should be the focus of this strategy and ways of tackling its impact need to be ingrained in the response. We need long term cross party solutions which require thought, commitment and ingenuity. Technological advancements mean that eco friendly materials can be used to build house. Developers should be required to commit to using these, and local suppliers to help minimise pollution and aid the economy. Repurposing of current housing stock or clearing brown field sites is key in protecting the environment and limiting the long term damage caused by adopting lazy solutions to important problems. The air quality in Reading is appalling. Access to proper health care is extremely difficult. RBC needs to focus on improving the quality of life for current residents, not expanding the population and compound the problems for even more.</p>	<p>No updates proposed. The LPPU seeks to ensure that the Climate Emergency is central to the vision and objectives of the local plan. Policies CC2, CC3, CC4 and H5 set out specific proposed changes relating to development to ensure climate targets are met.</p> <p>The appointment of contractors during construction is beyond the control of planning policy.</p> <p>Due to the urban nature of the borough, the majority of development occurs on brownfield land. The new Local Plan proposes a presumption against demolition in favour of repurposing and retrofitting existing buildings in order to reduce environmental impact.</p> <p>Air quality is dealt with under policy EN15. Healthcare access is addressed within the IDP, please see this document for more detail.</p>
Reading Climate Action Network	<p>Whilst there is much that is excellent in this Update, I think the scale of the climate emergency demands greater ambition from all of us. It's time to be bold!</p> <p>I would like to see more evidence of planning for the skills we will need e.g. policies to work with local colleges etc to provide more skills training. This could be linked with efforts to attract Green industries to the area, which would be able to use the local skills base. This will provide high quality jobs for our young people. why not make Reading a thriving hub for Green industry!</p> <p>I would also like to see the Local Authority seeking innovative approaches, for example providing seed funding for community organisations / co-operatives that could build green infrastructure (along the lines of Reading Hydro).</p>	<p>Noted. Although RBC broadly agrees with the aim of providing high quality jobs through green industry, this is not considered to be within the scope of the Local Plan.</p>
VOWH & SODC	<p>In terms of addressing the Climate Emergency, the partial review highlights that RBC is targeting greater emission reduction targets and improved net zero targets over and above the minimum standards. We support this approach as well as the 'Standards for new housing' policy direction, which also seeks for a greater than minimum standards (Building regulations) target for energy efficiency, as well as considerations for embodied carbon, water efficiency, and renewable energy production.</p>	<p>Answer is noted. No changes required.</p>

Q. 3 Do you have any comments on the suggested changes to the vision, objectives and spatial strategy?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
James Ford	N/A	<p>No, see above. I would like to see infrastructure laid in grid "rings" so that a problem in one area doesn't cut off a huge area as the feed could be diverted around the problem minimising the people left without the service.</p>	<p>Answer is noted, but it is not within the scope of the Local Plan. Although the Local Plan is</p>

			concerned with ensuring the proper infrastructure is in place to enable development, individual infrastructure providers such as Thames Water or SSE are responsible for planning and maintaining networks.
Adam Boulding	N/A	yes - we should include more waste provisions in the policy... a national infrastructure. For example glass recycling in reading is poor. the national DRS (deposit return scheme) is coming, why don't you start thinking about it and making policies to help and even be an early adopter of this now.	Do not agree. No change proposed. Details of the forthcoming deposit return scheme are still unclear. At such time the scheme is implemented, it is not considered that any local policy is necessary for implementation in Reading.
Henry Wright	N/A	In light of the housing crisis Reading Borough should seek to exceed the minimum calculated additional dwellings. Reading should also acknowledge in the vision the opportunity provided by new development to continue Reading's transition to a tier 1 city through e.g. premium parks, riverfront access, entertainment venues and culture and arts environments.	No changes proposed. The LPPU proposes to update the housing provision figure (Policy H1) to reflect available capacity for the plan period. It would be difficult to go beyond this figure as it would not be possible to accommodate this in full, which means relying on exporting unmet needs elsewhere. It is not clear what the suggestions for the vision will add beyond what is already included for this.
Christian Harris	N/A	As above	See officer response to Q. 2.
Mark Treder	N/A	As above	See officer response to Q. 2.
Debbie Sadler	N/A	There has been a great deal of building going on in Reading over recent years, primarily for commercial properties but also flats and housing. With the focus on home working, many commercial spaces are no longer required. Consideration should be given to re-purposing these sites rather than simply building on different sites. We don't need more buildings. We need to better use what is in place.	Comments are noted. No change proposed. Evidence for commercial floor space needs is emerging and will take into account factors such as homeworking. The updated need for commercial use will inform the full draft of the Partial Update and the individual policies where relevant. Development for flats and housing is based on local housing needs for Reading. Appendix 2 of the Scope and Content document contains the additional sites nominated for development, including the type of development suggested by the nominator. However, a number of alternatives are listed, often including, for example, conversion, where relevant. A decision on how to progress nominated sites has not been made yet.
Reading Climate Action Network	N/A	I am happy with these suggested changes.	Noted. No change needed.
Anthony Acka'a	N/A	Nope, very reasonable	Noted. No change needed.
CADRA	N/A	CADRA notes the increased housing requirement and the complex relationships with neighbouring authorities. We support the need for family housing.	Answer is noted. No changes required.

Natural England	N/A	See response to Q2	Noted.
Louise Acreman	N/A	Proposals make sense	Noted. No change needed.
Jennifer Susan Cottee	N/A	I agree	Noted. No change needed.
Jean H Rainey	N/A	Yes	Answer is noted.
Reading Friends of the Earth	N/A	Changes in 3.13 seem sensible. a) 3.7 Need right housing in right places – with appropriate transport links and access to environment and other needs – to provide a sustainable solution. Should be assessed on a 'Greater Reading' basis. b) Town centre development places even more requirement for better air quality. Can we assume clean air? Electric vehicles with batteries still produce particulate pollution – electric trams or hydrogen-powered buses may be better? Need less traffic. New developments with zero or minimal allocated parking spaces	Answer is noted. The update has included joint working with neighbouring authorities to consider housing need across boundaries. Policies within the Local Plan aim to limit car parking in accessible locations and reduce congestion.
Stantec OBO St Edwards Homes	N/A	We support the proposed updates to the vision, objectives and spatial strategy, recognising that updates in respect of sustainability and areas which are the focus for growth are necessary for the Plan to reflect and appropriately address current circumstances. In particular, it is vital that the Local Plan's strategy enables housing needs to be met in full as we discuss further below. In terms of the locations for much needed development to be provided, we agree that, as paragraph 3.5 of the consultation document notes, South Reading will be an important component of the spatial strategy, alongside Central Reading. As detailed further below, land at Green Park Village in South Reading presents an opportunity for sustainable development which would contribute towards meeting housing needs in a manner consistent with the proposed spatial strategy.	Answer is noted. No changes proposed.
Savills OBO Viridis	N/A	The Council's existing Spatial Strategy, as set out within the adopted Local Plan (2019), notes that Reading is a constrained Borough, and provides that Central Reading is the focus of meeting much of the identified development needs through medium and high-density developments. See NPPF paragraph 62 (footnote 27). In his regard, the proposed approach to focus development in the most sustainable part of the Borough – the Central Area – would align with the NPPF and be consistent with the overall vision and objectives of the LPPU, for example to make efficient use of brownfield land, and ensure new development is accessible and sustainable (objectives 2 and 5). The approach would also help to maximise the opportunity to deliver the housing needs of the Borough in full. The need to maximise delivery within the borough boundaries is greater given the December 2023 changes to the NPPF. For these reasons the proposed policy approach is supported.	Answer is noted. No changes required.
Savills (OBO Elder)	N/A	We welcome the Vision's continued focus on delivering the majority of new housing in the Central Reading area, where the majority of brownfield sites are located, particularly in the Town Centre.	Noted. No changes required.
Stantec (OBO UoR)	N/A	In the context of both UK legislation and global commitments to address the climate emergency through reducing greenhouse gas emissions and moving away from fossil fuels (COP285, December 2023), the University is supportive of the proposal to reflect the Climate Emergency and the move to a net zero carbon Reading by 2030. Both RBC and the University have organisational commitments and action plans to achieve net zero carbon by 2030. Therefore, the University supports the changes to the vision, objectives, and spatial strategies as they are aligned with existing Plans and Strategies.	Answer is noted. No changes required.

Stantec (OBO Aviva Life & Pensions Ltd)	N/A	<p>We welcome the confirmation that levels of development will continue to be set out in the spatial strategy contained in the Local Plan. We support the updating work proposed to the HELAA, and note that this may result in the need to change the capacity expectations for sites, for example by increasing density on appropriate sites, in order to facilitate the Council in meeting its development needs.</p> <p>Additionally, we note and support the Council's expectation that looking forward to 2041, there will need to be an even stronger focus for development in Central Reading in order to deliver housing need. As the Council is aware, and is acknowledged by the adopted Local Plan site allocation, the Reading Station Retail Park site is deliverable, in a sustainable location and capable of assisting the Council in the delivery of housing and commercial needs in the borough. The capacity and technical acceptability of the site has been demonstrated in the current planning proposal for its redevelopment, to provide a residential led mixed use scheme.</p>	Answer is noted. No changes required.
Montagu Evans (OBO Abrdn)	N/A	<p>We welcome the proposals to reflect changes to overall levels of development, including in relation to housing provision. However, in order to support the increased provision policy also needs to support a more effective and efficient use of its allocated housing sites, especially those that remain allocated and are yet to be developed, alongside establishing new housing sites. In addition to Central Reading, the focus should be on the Opportunity Areas, including the East Side Opportunity area where development is coming forward, but policy needs to continue to support the efficient development of the large remainder of the Opportunity Area that is not yet developed. The Partial Review should be taking the opportunity to review the indicative development capacities of these sites, particularly for new homes, but has not. This is a missed opportunity which would otherwise help housing delivery over the plan period.</p> <p>It is clear from the evidence of planning permissions both in Town Centre and the Opportunity Area that the lower end of the ranges of density per hectare identified in 2019 Local Plan (including Policy H2 and in the lower end of the ranges in CR13) were unrealistically low. As a consequence, there needs to be a proper review of the allocations particularly in the Opportunity Areas, that are the only realistic opportunities for meeting the higher identified housing needs. The plan is therefore not positively prepared because it has been unwilling to realise the opportunity to deliver more homes than currently allocated in the opportunity areas. Abrdn's firm view from its pre-application engagement with RBC is that the opportunity to accommodate increased density is being missed because of the approach of arbitrary capping heights rather than testing sites positively using up to date townscape analysis.</p>	Noted. The dwelling capacity of all existing sites have been reviewed and, in many cases, increased, and this makes a major contribution to delivering the level of housing planned.
Savills (OBO John Lewis Partnership)	N/A	See NPPF paragraph 62 (footnote 27) which emphasises the need for the largest urban centres (including Reading) to accommodate an uplift in their housing requirements within their boundaries. In this regard, Central Reading is the most sustainable location for new development in the borough based on the availability of services and facilities and sustainable transport connections. Indeed within Central Reading the JLP Mill Lane site is in a highly sustainable location opposite The Oracle shopping centre and within 1km of Reading railway station. The proposed approach to increase the focus on Central Reading aligns with the provisions of the NPPF (2023) and is therefore fully supported.	Answer is noted. No changes required.
Savills (OBO Sorbon Estates Ltd)	N/A	<p>The LPPU proposes an even stronger focus on delivering homes at a high density within the town centre and seeking to secure more family-sized homes with three or more bedrooms. It proposes that the strategy will place greater importance on delivering family dwellings, particularly outside the town centre (paragraphs 3.5 to 3.7 in the LPPU).</p> <p>The NPPF (December 2023) (paragraph 62) continues to emphasise the necessity for urban centres (which includes Reading) to accommodate an uplift in their housing requirements, within their boundaries. The Spatial Strategy should reflect and be consistent with this approach. It should emphasise the importance of making an efficient use of previously developed land, through optimising densities, to ensure as many new homes are delivered as possible.</p> <p>The updated Spatial Strategy should continue to recognise that South Reading presents significant potential for development opportunities, in particular, areas along the A33, a key strategic transport corridor. Paragraph 3.2.6 of the adopted Local Plan 2019 identifies that existing developed sites of poor quality in this area could be developed to create a high-quality gateway into the town. Optimising the development potential of South Reading could help to support Reading's overall local housing needs within its boundary.</p>	Noted. No change needed. The Local Plan seeks to optimise the potential of all parts of Reading, including South Reading, and this includes identifying Reading Link Retail Park as a site allocation.

		<p>In this context, the updated Spatial Strategy should continue to recognise the potential of South Reading and in particular, areas on the edge of the town centre that can create a high-quality gateway. Site SOU1 – Reading Link Retail Park, whilst technically located in the area of South Reading is only approximately 650 m south of the Central Reading boundary and located on the key A33 strategic corridor. The Sustainability Appraisal (SA) for the LPPU identifies that Site SOU1 would have a ‘significant positive effect’ in delivering homes, utilising previously developed land and reducing the need to travel by car (given its proximity to transport links). This site is not subject to any significant constraints that could not be overcome through careful design and represents a significant opportunity to deliver new homes in a sustainable location close to Central Reading.</p> <p>Therefore, the Spatial Strategy should recognise that there are sites such as Site SOU1, on the edge of Central Reading that can also deliver homes at a higher density, to create the high-quality gateway envisaged. This should be recognised in the Spatial Strategy. This would also help ensure that the LPPU meets the objectives that are set in the adopted Local Plan 2019, which amongst others, include seeking to improve the quality of life of those living and working in the borough (Objective 3); locating development in sustainable and accessible areas (Objective 5); promoting cycling and walking (Objective 7); and importantly, making the most efficient use of previously developed land as possible (Objective 2).</p>	
The Woodland Trust	N/A	Support the amendment to the vision and objectives to reflect the Climate Emergency and the move to a net zero carbon Reading by 2030.	Noted. No changes required.
M Langshaw	N/A	<p>Updating to correspond with changes in adjacent Unitary Authorities’ plans is essential.</p> <p>Census results showing eg growth in household size underline the importance of the provision of family sized housing as near to central Reading as possible, as well as in more outlying areas. Central Reading needs the stability that more often comes with family homes, that will be lived in and nurtured for decades, as well as small flats. A mix of types of household is also essential to support facilities (including eg a range of retail offerings, and schools, an area in which Reading currently excels).</p>	Agree. No change proposed. The update has been informed by discussions with surrounding Local Authorities. H2: Density and Mix has been amended to require a higher proportion of family homes.
Graham Bates	N/A	The aims are noble but the evidence is that the town is going in the opposite direction anyway and will never achieve net zero by 2030 with the developments planned. They instead appear to be a deception to fool residents and disguise the true situation.	Do not agree. No changes proposed. The Council takes the climate emergency very seriously. The plan will be updated to ensure that this is central to both the vision and objectives of the local plan. Policy revisions are proposed to ensure appropriate climate mitigation.
Woolf Bond Planning (OBO Fairfax Planning)	N/A	As indicated, it is essential that the spatial strategy does not discount growth in adjoining authorities towards delivery the wider needs of the borough. This is especially important for land north of the town (in South Oxfordshire District) given its clear functional relationship with Reading.	No change proposed. The Local Plan update and Housing Need Assessment has been informed by joint working with adjoining authorities.

Additional representations submitted via email regarding the vision, objectives and spatial strategy

Respondent name	Comments	RBC Officer Response
National Highways	National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and	Answer is noted. No changes proposed. Transport modelling will detail any significant increases of traffic on the highway network.

	<p>efficient operation of the SRN, in this case the M4. We would be particularly interested in any significant amount of traffic being added to M4 junctions 10, 11 and 12.</p> <p>Overall, in accordance with national policy, we look to Reading Borough Council to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We welcome the Council's vision to provide sustainable development whilst promoting active travel and public transport use to limit car journeys and congestion locally, and hopefully on the wider network. We also welcome the proposed update to the plan's vision and objectives to better reflect the council's climate emergency and net zero policies. Having reviewed the proposed approach to updating the transport policies in the LPPU, we note that only minor and mostly administrative changes are proposed. We therefore have no comment regarding the scope and content consultation document.</p>	
<p>Earley Town Council</p>	<p>The Town Council commends RBC's aspiration for achieving zero-carbon during the period covered by the plan.</p>	<p>Noted. No changes needed.</p>
<p>OCC</p>	<p>We welcome to the intention update the Local Plan vision, objectives and spatial strategy to reflect the target of net zero carbon Reading by 2030.</p>	<p>Noted. No changes needed.</p>
<p>Woolf Bond Planning (OBO Fairfax Reading)</p>	<p>It is noted that paragraphs 3.8 to 3.12 of the Partial Update reference the wider functional relationship of settlements in the adjoining authorities (including South Oxfordshire) and how these rely upon Reading for many services. This is especially true of high order services including health, education (especially post 16), culture and recreation alongside access to retail, employment and frequent quality public transport services.</p> <p>The importance of Reading as a focus for employment is illustrated in the travel to work areas (map showing extent of this from the 2011 Census returns included in part 1 of this response). Whilst initial results from the 2021 Census have been published, no equivalent analysis has been undertaken of travel to work areas.</p> <p>In the context of public transport services, the map below illustrates the extent of services offered by Reading Buses in January 2024. This shows that locations in South Oxfordshire have access to bus services, including those through the Emmer Green area (routes 23, 24 & 25) which provide connections to the town centre. Reading railway station is one of the busiest railway stations in the country with 12.4 million passengers entering or exiting it from April 2022 through to March 20238. The map within section 1 of this statement noted that South Oxfordshire was amongst the closest areas to the station outside of the boundary of Reading borough.</p> <p>Therefore although paragraph 3.9 of the Partial Update references the current Memorandum of Understanding with the West of Berkshire authorities for addressing the shortfall which arose during the preparation of the current Local Plan, the above is clear that in identifying opportunities to resolve the emerging deficit of 77 dwellings annually, South Oxfordshire should also be engaged in contributing the solution.</p> <p>The Reading zone of influence is illustrated by the inclusion of the southern parts of SODC within the Reading Travel to Work Area together, with the reliance upon the town for especially higher order services including healthcare, education, culture, leisure and retail together with access to high quality frequent public transport services, especially rail.</p> <p>As set out in the NPPF, Local Plans must be capable of delivering from the point at which they are adopted. This means scrutinising the policy wording to ensure the plans are sound and that the allocations contained therein are capable of being delivered at the point envisaged. This is particularly the case in relation to the need for Councils to collate a robust evidence base to justify the imposition of certain policies and/or their wording so as not to overburden and/or stifle sustainable and appropriate development.</p> <p>In this instance, the draft Local Plan needs to be amended to make it sound and to ensure it robustly plans for the delivery of sufficient housing to address a housing requirement established in accordance with national planning policy and guidance.</p>	<p>Noted. The relationship with parts of South Oxfordshire is recognised and Reading continues to fulfil the duty to co-operate with SODC, as set out in the Duty to Co-operate Statement.</p> <p>The Local Plan Partial Update does not give rise to unmet needs when based on the identified need of 735 homes per year, and the justification for this approach is set out elsewhere.</p> <p>It is not considered appropriate for the Local Plan to endorse specific development sites outside its boundaries unless this development is part of a joined-up strategy with its neighbours as, for instance, the Grazeley site was when the plan was adopted.</p>

<p>Reading Borough's update to the Local Plan should consequently be supportive of further growth, especially at locations adjoining but beyond the borough boundary.</p> <p>This would include development on the parts of the former Golf Course south of Cucumber Wood. The policies of the future plan should not limit the delivery of growth in such locations.</p> <p>As the site was formerly in use as a private golf course, but has not been in use for some time, it does not currently contribute towards meeting the open space and recreational needs of the town. This contrasts with its significant potential as a housing allocation. Whilst the southern part of the site (within Reading borough) was allocated in the current Plan for residential development and has since received detailed planning permission for 223 dwellings, there remains further potential on other parts. Whilst the other parts lie in South Oxfordshire District, the approach of the Plan must not impinge upon the delivery, especially given that under the current approach, there is a significant unresolved need.</p> <p>The Site affords an inherently sustainable location in providing for housing opportunity and choice as it is within walking and cycling distance of the facilities in and adjoining the Emmer Green District Centre (Designated under Policy RL1 of the current Local Plan). These merits were recognised by the Council's allocation of the southern part of the site for between 90 and 130 dwellings in policy CA1b. As indicated above, the allocated site and other land on the golf course within Reading Borough subsequently received planning permission for up to 223 dwellings. These homes are being constructed by Vistry.</p> <p>The part of the former Golf Club south of Cucumber Wood has been promoted to South Oxfordshire District as a location for residential development. Given the acceptability by Reading of its section of the former Golf Club, through these representations to land in South Oxfordshire District is being advanced to contribute towards addressing the unresolved needs of Reading Borough. As the land at the former Golf Club is amongst the nearest areas to Reading station outside of the Borough, this is an illustration of its sustainability. This view is taken as other undeveloped areas are significantly further from Reading station, which is a key indicator of sustainability given the extensive facilities within its immediate surrounds.</p> <p>This includes the substantial employment opportunities alongside the access to very frequent rail services, especially along the Thames Valley into London.</p> <p>The above map indicates that it is land within South Oxfordshire and Wokingham Borough that are closest to Reading Station outside of Reading Borough. As the land in Wokingham Borough forms part of the main campus of the University of Reading and the land alongside the River Thames is within flood zones 2 and 312, it is only land north of Caversham Heights (around the former Golf Club) that is outside of the Chilterns Area of Outstanding Natural Beauty (now known as National Landscapes (shown by dotted notation of Magic Map) that could be considered.</p> <p>The enclosed Development Strategy Plan (2209/PR-04 Rev C) (Appendix 2) has been informed by an evaluation of the sites' key challenges and opportunities. Proposals have been designed to respect and respond to the existing ecological features of the site such as the trees and hedgerows alongside levels, as well as the relationship of the development to the surrounding built context and settlement edge. Residential density is proposed at an average of 29 dph (dwellings per hectare) (net) which would enable around 100 dwellings to be delivered on the 5 ha site. This density is considered appropriate to reflect a transition from Reading into South Oxfordshire, in the context of the surrounding residential development along Soane End, Highdown Hill Road, Crawshaw Drive and Kidmore End Road.</p> <p>The proposals highlight the opportunity for a key new pedestrian and cycle route across the site providing significant new public open spaces, recreation spaces, parkland and ecological enhancement."</p> <p>See full response for maps</p>	
---	--

Chapter 4: Plan period and strategic policies

Q. 4 Do you agree with the proposed plan period of 2023 to 2041?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Christian Harris	N	To long as things change in less time	No change needed. Notwithstanding the plan period, the local plan will undergo a review within 5 years to establish whether an update is required.
Mark Treder	Other	No point as you will not stick to the plan	No change needed. It is noted that there is a legal requirement for planning decisions to be taken in line with the development plan unless material considerations indicate otherwise.
Reading Climate Action Network	Other	Yes, but wouldn't it be a good idea to align the updates to the Local Plan with other updates? For example, the Climate Strategy is due to be updated during 2024 to run from 2025-2030. This is a critical time period, but the Climate Strategy will once again be too late to inform the Local Plan. This is a missed opportunity. Could you include reference to the soon-to-be-updated Climate Strategy as an important adjunct to the Local Plan and a presumption that that document be consulted in determining whether a development is compliant with the Local Plan?	Answer is noted. Unfortunately it is not possible to align these timescales as the Local Plan is bound by statutory timescales. The update does refer
Paul Oliver James Melville	Other	LETS NOT BE TOO HASTY ON IMPLEMENTING PLANS WHEN OVER TIME RADICAL CHANGES TO IT MAY BE NECESSARY. THIS COULD INVOLVE US IN MORE UNNECESSARY COSTS.	No change needed. Notwithstanding the plan period, the local plan will undergo a review within 5 years to establish whether an update is required.
Anthony Acka'a	Y	I feel indifferent to this as I don't fully understand the implications of this change.	No change needed. Information on the plan period can be found in Chapter 4 of the LPPU Scope and Content document.
Sport England	N	No, unless there is to be a full plan review within this period, the time span is too great.	No changes proposed. Planning policies will be reviewed every 5 years.
HBF	No answer	The Council are required to have a plan period that looks ahead for at least 15 years post adoption. However, the Local Development Scheme (LDS) sets out the expectation of the plan being adopted in the summer of 2025 which would mean that a plan that runs from 2023/24 to 2040/41 would not look ahead for a full 15 years from adoption. Whilst this is only marginally short of what is required the HBF are concerned that the timetable for preparation set out in the LDS is overly ambitious. For example, the Council expect the period from submission to adoption to be nine months, however, in our experience this will take at least 12 months from the appointment of the inspector to the adoption of the local plan but for the majority of local plans this will take much longer. As such we would suggest that an extra year is added to the plan period to ensure that the plan period is sound.	No change proposed. The LDS has been amended to reflect an adoption date towards the end of 2025. However, adoption in 2026 would also fulfil the requirement to plan for 15 years from adoption.
Reading Friends of the Earth	Y	Yes. Plan period is mandatory. But addressing climate change and poor air quality and loss of wildlife habitat must not be allowed to wait until 2041. Work on infrastructure such as heat networks must be started very soon.	No changes proposed. The policies within the update will apply upon adoption.

Stantec OBO St Edwards Homes	No answer	To be consistent with paragraph 22 of the NPPF (NPPF), strategic policies must look ahead over a minimum of 15 year period from adoption. The plan period therefore must be extended to at least 2041, taking account of the time to progress the Local Plan to adoption following this early stage consultation.	No change proposed. The plan period is already proposed to run to 2041.
Savills OBO Viridis	No answer	The proposed Plan period provides for only a 1 year buffer over the minimum prescribed by national policy (15 years). It may be prudent to consider a longer Plan period in order that any delays with adoption of the document do not jeopardise its soundness i.e. any short term delays result in a need to undertake additional consultations associated with rolling the Plan period forward if this subsequently becomes necessary.	No change proposed. The LDS reflects an adoption date towards the end of 2025. However, adoption in 2026 would also fulfil the requirement to plan for 15 years from adoption.
Stantec OBO SEGRO	Y	As set out at paragraph 4.1 of the Scope and Content (Regulation 18) consultation, it is proposed the base date of the Plan be changed from 2013 to 2023 and the end date changed from 2036 to 2041 to ensure that there are 15 years, plus a one year buffer from the expected adoption date in 2025. On the basis that this would provide a minimum Plan period of 15 years from the date of adoption, SEGRO agree with the proposed Plan period of 2023 to 2041.	No change required.
M Langshaw	Y	As given in the document.	It is unclear what is meant by this comment. No changes required.
Graham Bates	Other	The proposals with cross references are impossible for ordinary people to follow. You are unlikely to get a meaningful response in worthwhile numbers.	Answer is noted. No changes proposed. The Scope and Document listed out the questions in chronological order for ease and physical copies could be picked up from libraries to assist with the review.
Woolf Bond Planning (OBO Fairfax Planning)	N	No. As indicated in the Statement, the Plan period should be from April 2023 to no earlier than March 2042. This is because the Council's overly optimistic assumptions with regard to the examination of the Plan.	No change proposed. The LDS has been amended to reflect an adoption date towards the end of 2025. However, adoption in 2026 would also fulfil the requirement to plan for 15 years from adoption.

Additional representations received via email regarding the plan period

Respondent name	Comments	RBC Officer Response
Woolf Bond Planning (OBO Fairfax Reading)	<p>Although the Council's consultation on the Partial Update pursuant to Regulation 18 is underway to January 2024, the subsequent timeline is not considered to be realistic.</p> <p>Whilst the Council's LDS (December 2023) indicates that the whole examination process for the Local Plan can be undertaken within 8 months (Nov 2024 – Jul 2025), this is a stage outside of their direct control. Having reviewed the evidence on the realism for the timeframe of the examination, our conclusion is that the current expectation is not realistic.</p> <p>For the reasons we explain, this has implications for the plan period and the overall housing requirement for Reading Borough as currently referenced in the emerging plan (questions 4 and 27)</p> <p>In determining a more appropriate timeframe for the examination of the Local Plan, we have had regard to the performance achieved by the Council in the preparation of the current Reading Borough Local Plan alongside consideration of that which has occurred for comparable strategic local plans prepared elsewhere in England. This comparison with other strategic plans has reviewed those prepared since the NPPF confirmed the role of Standard Method in establishing housing requirements (from 25th January 2019 as detailed in paragraph 227 of the NPPF).</p>	<p>No change proposed. The LDS has been amended to reflect an adoption date towards the end of 2025. However, adoption in 2026 would also fulfil the requirement to plan for 15 years from adoption.</p> <p>The Council is mindful of the requirement to swiftly progress plan-making. It is recognised that delays after submission can arise, but it is worth being aware that this is a Partial Update only, not a comprehensive Local Plan, and this is expected to lead to a reduced timeframe at examination.</p>

	<p>With respect to the current Reading Borough Local Plan, consultation on the draft Submission Version of the Plan commenced on 30th November 2017 and it was submitted to the Secretary of State for examination on 29th March 2018. The Local Plan was not found sound by the Inspector until 24th September 2019. That process took 663 days (1 year 10 months) from the start of the consultation period on the draft Submission plan until it was found sound, with 544 days (around 18 months) from submission to the Secretary of State until it was found sound.</p> <p>In other strategic policy documents prepared by local authorities since the standard method was specified as the default approach in the 2018 edition of the NPPF, examinations of plans have not been significantly quicker than the process taken for the Local Plan. This is illustrated by the review of those plans submitted for examination after 25th January 2019 date before which the 2012 version applied, as detailed in paragraph 223 of the current NPPF.</p> <p>The Government publishes data on the progress of examining Local Plans which indicates that for the 43 plans submitted for examination since 25th January 2019 and found sound on or before 22nd January 2024, there was on average 775 days (over 2 years and 1½ months) between publication and the document being found sound. This also shows an average of 548 days (18 months) between submission for examination and the document being found sound. Since adoption cannot occur until after the plan has been found sound, this will therefore occur later.</p> <p>Whilst the analysis of latest Government data indicates a speeding up of the process, it is not to the extent envisaged by the LDS which as noted assumes no more than 8 months between submission and adoption (or up to 12 months between publication and adoption).</p> <p>Applying the analysis on timeframes of other plans submitted since 25th January 2019 to the emerging Reading Borough Plan (assuming a draft Submission Plan is published for consultation on Thursday 1st August 2024 (the earliest date referenced in the LDS)) means that an Inspector's Report confirming the document is sound might be anticipated on 15th September 2026. Adoption could occur later that year. This is over a year later than the June/July 2025 timeframe envisaged in the Council's LDS.</p> <p>Even assuming submission is achieved consistent with the LDS (say Friday 1st November 2024), this would mean that an Inspector's Report would not be received until Sunday 3rd May 2026 (allowing the average of 548 days associated with the examination of other strategic plans). As indicated, the examination of the current Reading Borough Local Plan took 544 days and therefore the use of the national averages is appropriate. This means that unlike the Council's expectation that the Inspector's Report could be received in June 2025, a more realistic timeframe would be between May and September 2026. This is assuming there are no delays before consultation on a draft submission plan occurs.</p> <p>Therefore, although the Council suggests that the current plan period includes a one year buffer (paragraph 4.1 of the Partial Update), for the reasons above this is insufficient to still ensure it provides for the full 15 year post adoption.</p> <p>As the Council undertakes monitoring based upon period from 1st April through to 31st March the subsequent year, given that the Inspector's Report would not be received until spring/summer 2026, to provide for at least 15 full years of plan monitoring, the period must extend from 1st April 2027 until at least 31st March 2042 (one more year than that currently expected).</p>	
<p>Woolf Bond Planning (OBO Fairfax Reading)</p>	<p>As indicated, the NPPF is clear (paragraph 61) of the role of the standard method in informing the derivation of housing targets. Although paragraph 8.5 references the 35% uplift which applies to Reading as one of the 20 largest urban areas, it disputes the relevance of this. However, the Government is clear that this forms an essential part of its approach to delivering the wider objective of significantly boosting the supply of housing. Consequently, it is essential that the Plan seeks to deliver at least 877 dwellings annually.</p> <p>As indicated, Reading borough undertakes its monitoring on broadly financial years from 1st April to the following 31st March.</p>	<p>No change proposed. The Housing Needs Assessment sets out the reasons for proceeding on the basis of the level of need proposed. The Council considers that the plan end date of 2041 gives adequate headroom for 15 years from adoption, although of course the Council will be in the hands of the Inspectorate.</p>

	<p>Consideration of the relationship between monitoring data and the length of the plan period was reviewed by West Berkshire, as detailed in their response of September 2023 to the Inspector’s Preliminary Questions.</p> <p>Of relevance is the Council’s response to the Inspector’s Preliminary Question number 19 which sought a response to why Strategic Policies of the Plan did not look forward a minimum of 15 years after adoption as expected by national policy.</p> <p>West Berkshire Council’s response (see page 40 of Appendix 1) was to extend the plan period for 2 years, to take account of the use of quasi financial years (1st April to following 31st March) for monitoring alongside an extended examination period. See Appendix for full response.</p> <p>The approach of West Berkshire indicates an acceptance of a need to adjust the Plan period to ensure that they comply with the clear obligations in national policy to provide at least 15 years after adoption. This therefore reflects that we advocate.</p> <p>Our change only extends the total plan period by one year (2023 to 2042 (19 years) compared to the Council’s 2023 to 2031 (18 years)).</p> <p>As we concur that the minimum annual housing requirement for Reading Borough is 877 dpa (rounded), the minimum overall housing requirement would be for the 19 years specified would be at least 16,663 dwellings.</p>	
Gladman	<p>The Council are required to have a plan period that looks ahead at least 15 years from the date of adoption. The latest Local Development Scheme sets out an expected adoption of Summer 2025 which Gladman consider to be overly ambitious given that the plan is likely to face significant scrutiny given critical housing needs issues identified alongside neighbouring authorities are also undertaking plan preparation simultaneously which will have a bearing on Reading. If there is any delay to the proposed timetable, then the plan would not look ahead for a full 15 years from adoption and therefore it is considered that the Council should extend the plan period by at least 1 year.</p> <p>Finally, while Gladman acknowledge the reasons for undertaking a partial update serious consideration must be given to meeting development needs of Reading beyond 2041 and undertake comprehensive and proactive engagement and consultation with neighbouring authorities to delivery a strategic growth strategy to meet future needs in sustainable locations in the region. This is explored in further detail throughout this representation and in Appendix 2.</p>	<p>No change proposed. The LDS has been amended to reflect an adoption date towards the end of 2025. However, adoption in 2026 would also fulfil the requirement to plan for 15 years from adoption.</p> <p>The Council is mindful of the requirement to swiftly progress plan-making. It is recognised that delays after submission can arise, but it is worth being aware that this is a Partial Update only, not a comprehensive Local Plan, and this is expected to lead to a reduced timeframe at examination.</p>

Q. 5 Do you agree with the list of strategic policies?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Mark Treder	Other	As above	See officer response to Q. 4.
Debbie Sadler	No answer	We really need to improve access to and availability of green space to help improve air quality and preserve wild like. Internationally, countries are creating green corridors in towns and cities to help with environmental impacts of climate change (heat and erosion) but also to improve air quality which is a significant issue in Reading. We need to improve and re-purpose what we have rather than simply knocking down and destroying new sites. We need a long term focus, not a short term one.	No changes proposed. It is not clear what incorporating these comments would achieve. Policy EN7 already protects designated local green and public open spaces from development. In relation to undesignated open space, policy EN8 confirms that there will be a presumption in favour of its retention. Policy EN9 sets out requirements for new open space provision. Policy EN12 deals with protection of The Green Network and is being expanded to

			ensure that a 10% BNG is achieved for all new developments.
Paul Oliver James Melville	Other	Time will tell.	No changes needed.
Anthony Ack'a'a	Y	Looks good but I don't understand what makes it strategic	No change needed. Paragraph 4.2 in the LPPU defines strategic policies.
Sport England	Other	In principle yes, but some of the policies do need to be kept under review to reflect changes coming from Central Government and beyond. E.g Active Travel England, which was established last year, 2023, may have an impact on a number of policies and may require their re-writing. New guidance has recently come out around biodiversity which will need to be incorporated. This goes back to the previous question about the length of the plan period.	No changes proposed. Policies will be reviewed every 5 years to ensure they are kept up to date. The policy team are aware of Active Travel England (ATE) and have sought to contact ATE to comment on the LPPU. However, ATE have confirmed they will not provide comments on the LPPU and only on specific planning applications that meet their threshold (e.g. proposals for 150+ homes). The provisions as set out within the Environment Act 2021 relating to biodiversity will be incorporated into updates for Policy EN12.
CAAC	N	The New Local Plan has six policies covering heritage (EN1, EN2, EN3, EN4, EN5, EN6). We have checked the paragraphs of the NPPF which define strategic and non-strategic policies (see below our bold). See sections 20 and 28 of the NPPF. <u>EN2 Areas of Archaeological Significance</u> We defer to the opinion of Berkshire Archaeology on whether this policy is strategic or non-strategic. <u>EN3 Enhancement of Conservation Areas</u> The definition of strategic and non-strategic both include the phrases 'conservation and enhancement' or 'conserving and enhancing' with non-strategic policies applying at the specific area level. Consequently our reading of the NPPF is that Reading's Conservation Area policy EN3 is strategic as it is an overall strategy applying to Reading <u>and not</u> a specific conservation area (CA). The only part of the policy which could be considered non-strategic is the last sentence of the policy "Where a Conservation Area Appraisal and Management Plan has been adopted for a particular Conservation Area, this will be a material consideration in determining applications for development." <u>EN4 Locally Important Heritage Assets</u> As for CAs above this policy sets out the development approach to locally important heritage assets so should be strategic. The wording of EN1 should changed to include it as a separate bulleted point at the beginning of the policy and replace 'assets on the Local List' with 'Locally Important Heritage Assets' for consistency. <u>EN5 Protection of Significant Views with Heritage Interest</u> Significant views with Heritage Interest are currently not mentioned within policy EN1 and so EN5 is the only policy that protects them. In enumerating the views, we accept that it is not strategic but that the policy to protect them should be a strategic policy. Paragraph 4.2.21 should be moved up to form part of policy EN5.	Noted. It is a matter of judgment whether or not policies are strategic in nature. There are many policies within the document that apply across the whole Borough but are nonetheless not considered to be strategic. The NPPF states that strategic policies "should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed". In this case, EN1 that is the most clearly strategic in nature as it addresses the main strategic priority around heritage, with EN2 to EN6 covering more detailed matters. There is no difference in the weight that should be applied in decision-making between strategic and non-strategic policies. The purpose of strategic policies is in a case where there are likely to be non-strategic policies in other documents, such as neighbourhood plans, which is not currently the case in Reading and is not expected to change.

		Views with heritage interest should be added with a specific mention into EN1. <u>Other strategic policies</u> We will not be commenting on the principle of whether other existing policies should be defined as strategic or non-strategic.	
Savills (OBO BOC)	No answer	Adopted Policy SR3 'South of Elgar Road Major Opportunity Area' allocates this area for 330-500 dwellings and supporting community uses. This allocated site would be located approximately 400 m from the existing BOC site at Rose Kiln Lane. Whilst BOC do not object to the principle of new residential development in Reading, it is imperative that these developments are sustainably and appropriately located and that adverse impacts to future residential amenity are avoided through mitigation measures, especially in respect of noise impacts. BOC welcome and support the following section of Policy SR3: <i>"Development will: i. Ensure that there are measures in place, such as an appropriate buffer between new residential development and any adjacent industrial and warehouse uses, to ensure that there are no adverse effects on residents as a result of noise and disturbance and the visual impact of business uses;"</i> Ensuring that there are absolutely no adverse effects on residential amenity as a result of noise from nearby industrial uses will be a challenge and noise mitigation measures are likely to be required. These could include: implementation of a scheme of sound insulation such as acoustically treated ventilation, an acoustic fence and/or a green buffer. Validation testing of the sound attenuation works should also be required to ensure that acceptable noise levels have been achieved. Any noise surveys undertaken should be extensive and should capture noises produced by the nearby BOC site (this may require a 24 hour survey over several days). Developers and decision-makers should closely follow the advice set out in the ProPG: Planning & Noise (2017).	Noted. No change required. Required mitigation will be considered in detail at application stage.
Historic England	Y	Yes. Within these policies, we welcome the identification of policy EN1 as the Council's strategic heritage policy.	Answer is noted. No changes required.
Opus Works (OBO Moda Living)	Other	Moda strongly supports the creation of sustainable neighbourhoods. As long-term custodians of their neighbourhoods, Moda is committed to driving down their environmental footprint, ensuring resources such as clean air, land and water remain accessible for future generations. Moda's strategy, Next Generation Futures, outlines their journey to create a positive contribution to the communities and environment in which they operate. Strategic policy that provides for a wider vision, bringing together cross-cutting objectives on development, infrastructure and environment is to be welcomed in this context; such an approach provides more certainty regarding key expectations and enables focus on a common set of deliverables that will be sought through inclusive regeneration. A sound and pragmatic local plan is positively encouraged which comprises strategic and local policies to underpin site or issue-specific details. Where Moda has specific comments on Strategic Policy, these are set out below in relation to other questions.	Answer is noted. No changes required.
Berkshire Gardens Trust	Y	Yes	Answer is noted
Graham Bates	Other	The entire consultation requires simplification to achieve a worthwhile response.	No changes required. Drop-in events and an online webinar, plus an explainer video were set up for those who had additional questions or required clarification about the consultation.

Chapter 5: Cross cutting policies

Q. 6 Do you agree that we should update the cross-cutting policies listed? (CC2, CC3, CC4, CC7, CC9)

Respondent name	Y/N/Other	Comments	RBC Officer Response
Mark Treder	Other	You cannot stick to a plan...	No change needed. It is noted that there is a legal requirement for planning decisions to be taken in line with the development plan unless material considerations indicate otherwise.
Anthony Acka'a	Y	Based on what I've read, yes it makes sense to update these	Answer is noted. No changes needed.
Natural England	Y	Agree (CC2, CC3, CC7, CC9 relevant to Natural England's remit).	Answer is noted. No changes required.
Sport England	Y	There has been a number of instructions/advice from Central Government come out since the original plan was published. It is only right to update cross-cutting policies. A good example is the production of Design Codes which would impact on a few of these policies.	Answer is noted. No changes proposed. Design Codes are forthcoming and LPPU policies will be updated where relevant to coincide with this.
TVCC	Y	We agree. We also draw your attention to the Chamber's State of the Region Report (published 2023) on sustainability and the work of the business-led Thames Valley's Sustainability working group that has informed this major research. We believe this can provide the Borough, and the Plan, with some important background information on how business sees its pathway to next zero and how companies are considering climate change and sustainability.	Answer is noted.
Stantec (OBO UoR)	Y	Yes. The University supports updating the cross-cutting policies to reflect the latest government guidance, standards and regulations relating to climate change and sustainability, design and mechanisms for securing infrastructure contributions from development. It also recognises the importance of 'future proofing' such policies to reflect the evolving national policy landscape in these matters. This will provide certainty regarding the requirements for developments coming forward.	Answer is noted. No changes required.
Stantec OBO SEGRO	N	SEGRO do not agree with the extent of the cross-cutting policies that are proposed to be updated. This is on the basis that some of the proposed changes to the policies are not considered viable or feasible and reference to sites being considered on a site by site basis, taking into account of the particular circumstances of each site, should be made within the policies. This comment is particularly relevant to Policies CC2 (Sustainable Design and Construction), CC3 (Adaptation to Climate Change) and CC4 (Decentralised Energy).	No change proposed. Each of the policies stated clearly accounts for specific cases in which policy requirements would not be feasible or would render a development unviable.
Tricia Marcouse	No answer	Agree to the cross policies needing updating, but would add CC5 as well, although the following point may be covered in other policies. With new technologies being introduced for sustainable development in the period to 2041, particularly those to ensure that products are designed for repair and easy recycling, and those to recover rare elements, there will be a need for new sites to undertake these activities. Locations for these need to be identified, preferably grouped together.	It is not considered necessary to update CC5 despite new technologies as the existing policy is intended to account for changes and aims to promote sustainable waste management generally.
The Planning Bureau on behalf of McCarthy Stone	N	See answer to question 7.	See officer response to Q.7

Aubrey Blazey	Y	<p>I find it ironic after building the new rivermead sports center without ground source heat pump even though it has a large car park. .. to now talk about retrofitting costs ?</p> <p>Rivermead sports center was built without solar panels or ground source heat pump under the parking - even though you raise the issue of retrofitting costs. - how would these new guidelines work in that case now?</p> <p>With regards to the new rivermead - the only way to walk to it from the town center is to act like a car - you have built a exercise center for people that drive.</p>	<p>Answer is noted. No changes required.</p> <p>The planning application for the new Rivermead Sports Centre was assessed against existing sustainability policies within the Local Plan (2019) and deemed to comply with such (e.g., it exceeded the BREEAM rating of 'Excellent' and does propose solar panels). New applications will be assessed against the updated policies once the LPPU is adopted.</p> <p>There are a number of bus routes with the vicinity of the site providing access to Reading town centre and nearby residential areas. It is also served by Readibus.</p>
M Langshaw	Y	Yes, rather than the possible options.	Answer is noted. No changes required.
Graham Bates	Y	As stated above, I am concerned about unsustainable over-frequent redevelopment and whole-of-life emissions that result. The highest standards are required but even then I doubt whether embodied emissions can be properly measured (to include sourcing of aggregates for instance) and reduced in order to achieve net zero targets.	Answer is noted. The proposed changes to our sustainability policies reflect best practice being pursued in other leading authorities around the UK. Policies will require embodied emissions to be assessed as accurately as possible using existing methods considered to be best practice in the building industry.

Q. 7 Do you agree that we should update policy CC2 as described? Are there other changes that are required?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Mark Treder	Other	As above	See officer response to Q. 6.
Reading Climate Action Network	Y	Yes. Additionally, many non-residential buildings have large roofs which could house significant amounts of solar PV capacity. Would it be possible to include a presumption that such roofs should be provided with solar panels even beyond the requirements for that particular building, so that the excess energy generated could be fed into the grid? Such an addition might even be profitable for the building owner, and would contribute to the requirements for decentralised energy production in the borough.	No change proposed. It is not feasible for planning policies to require individual developments to provide renewable energy for others beyond their own energy requirements. If a development is unable to meet its energy demand through renewable sources on-site it is required to enter an agreement to provide this infrastructure off-site, provide a financial contribution to contribute to such projects, connect to a decentralised energy network or demonstrate the proposal is BREEAM Outstanding or Excellent. An agreement to provide renewable infrastructure off-site may indeed involve local developers with excess solar PV capacity.
Paul Oliver James Melville	N	see previous answer.	See officer response to Q. 6.
Anthony Ack'a	Y	Good ideas for carbon zero and reducing environmental impact.	Answer is noted.

CADRA	No Answer	CADRA welcomes the update and the requirements for new homes to meet the highest standards of sustainable design and construction, including a strong presumption against demolition.	Answer is noted.
Thames Water	No Answer	<p>Policy CC2 in relation to water efficiency is supported in principle, but needs to be strengthened to ensure the water efficiency standard of 110 litres per person per day is met in practice.</p> <p>The Environment Agency has designated the Thames Water region to be an area of “serious water stress” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.</p> <p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: https://www.thameswater.co.uk/Be-water-smart</p> <p>It is our understanding that the water efficiency standards of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations. We therefore support Policy DM7 in referring the use of planning conditions. However, clarification should be provided in relation to the preferred ‘Fittings Approach’.</p> <p>Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.</p> <p>We therefore consider that text in line with the following should be included in Core CC2:</p> <p>“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</p>	Noted. Change proposed.
FCCG	No Answer	The highest standards of sustainable design should be required, with a strong presumption against demolition.	Noted. No change proposed.
Sport England	Y	Please note there is other alternatives to BREEAM which can create energy efficient/low carbon buildings, such as Passive design.	No change proposed. The proposed changes clearly state that applicants can “demonstrate the proposal is compliant with BREEAM or equivalent certification method.”
CAAC	Y	<p>We agree with the rewording.</p> <p>We are very pleased to see that this policy will be updated to take into account embodied carbon, the production of a Whole Carbon Life Assessment for a development and a presumption against demolition.</p> <p>With the phasing out of topic based SPDs consideration should be given to expanding the wording within the explanatory paragraphs in relation to the contents of the Sustainable Design and Construction SPD.</p>	Noted. Changes proposed to expand the policy text in order to account for any the most important information contained within the Sustainable Design and Construction SPD.

HBF	No answer	The Council state that this policy deals with the sustainable design and construction of new non-residential development. If this is the case, then the title of this cross-cutting policy is confusing as it is not clear at first that this only relates to non-residential development. The title should be amended to read Sustainable Design and Construction of Non-residential Development. This should also be reiterated in the policy itself.	Noted. Change proposed to clarify that the principles of the policy apply to both residential and non-residential development and clarify that additional requirements for residential development are stated within policy H5. This is now stated in the supporting text.
Reading Friends of the Earth	Y	<p>BREEAM was never focussed enough on carbon emissions so good to address separately Very good to address embodied carbon issue. Concern that in central Reading on-site generation will be solar and so – whilst useful:</p> <ul style="list-style-type: none"> • Inadequate because of limited roof-space on tall buildings • Seasonal so inadequate to address winter lighting and heating demand. <p>If there is not to be a SPD then should address implementation of and readiness for:</p> <ul style="list-style-type: none"> • Heat networks • Battery storage. • Heat storage. • Mechanical ventilation with heat recovery • Limiting peak electricity demand to prevent overloads and shut-down • Perhaps designing in spare network capacity. • Important to integrate cooling with heat pump and heat network systems. • Ground Source (or water-source) heat to be preferred over air source heat to minimise peak demand for electricity on cold days. <p>Exceptional basis clause. These suggested options are far too lenient. Fabric first must be mandatory and BREEAM certification should not exempt a building from funding low-carbon energy supply.</p>	Noted. No change proposed. It is considered that the Local Plan is not the appropriate place to specify the specific technologies that will be employed to achieve Net Zero. In seeking to meet the requirements of the policy, applicants will be required to meet energy demand through on-site generation and storage options and the Local Plan does not seek to specify how this will be achieved as long as the net zero hierarchy is applied. The exceptional basis clause will only be employed in cases where the prescribed approach is not feasible or viable and applicants must demonstrate the extent to which the most stringent requirements can be met.
Historic England	No answer	<p>We welcome acknowledgement of heritage as a consideration within the proposed “exceptional basis clause”, the addition of a paragraph requiring an embodied carbon assessment and language in local plan policy to deter demolition.</p> <p>We encourage the retrofit of traditionally constructed buildings using a whole building approach, informed by heritage expertise. This will help to reduce the potential risk of maladaptation, which can lead to more challenges and expense further down the line. We encourage the Council to integrate support for retrofit within plan policy, including of historic buildings. While this could be within existing policy, there may be merit in adding a specific new policy on retrofit, including of historic buildings. We would be happy to discuss this with the Council as appropriate.</p>	Noted. No change proposed. It is considered that retrofit of historic buildings is supported by policies EN1 – EN6 and these policies are not under review at this time.
Savills OBO Viridis	No answer	<p>The broad approach of updating policies to ensure development proposals achieve a high level of sustainability and support the Council's aim to be a net zero borough by 2030 is welcomed. It is however important to ensure that policy guidance relating to climate change is clearly written and does not include unnecessary duplication (as per paragraph 16 of the NPPF (2023) with building regulations requirements or other policy requirements. It is noted for instance, that Policy H5 also requires ‘new build housing to be net zero carbon’ and ‘new-build housing be designed to achieve water neutrality’, although with the addition of an ‘if possible’ clause. The addition of an ‘exceptional basis clause’ is welcomed although further clarification is recommended as to when and how this may apply.</p> <p>Whilst Policies CC2 and CC5 set out requirements for development to be ‘net zero carbon’, the LPPU consultation also includes separate references to ‘zero carbon homes’. Consistent terminology should be used throughout the LPPU to ensure policies are clear and avoid any risk of contradictions. To avoid confusion, we suggest the use of the term “net zero carbon” be used fully throughout, as this is more widely understood in the industry and aligns with national net zero definitions.</p>	<p>Answer noted. Change proposed to use “net zero carbon” throughout for consistency.</p> <p>It is considered that Local Authorities can continue to require requirements related to climate change that exceed the building regulations as the building regulations will not result in net zero construction in time to achieve Reading’s 2030 target. The policies proposed do not seek to duplicate the Building Regulations. Local policies aim to ensure that sustainable design and construction requirements result in new buildings that are truly net zero as soon as</p>

			possible. It is unclear how the exceptional basis clause could be further clarified. The policy seeks to ensure that each application will be considered on a case-by-case basis in order to ensure viability.									
Opus Works (OBO Moda Living)	Y	Reducing carbon emissions is an integral part of Moda’s agenda and targeting operational net zero carbon by 2030 is a key aspiration of their business plan. Reducing carbon, water and waste emissions, as well as buying and using resources as ethically and efficiently as possible all form part of their overall operational business strategy. In this context, a policy that is aligned with Building Regulations Part L, and remains consistent with this, is welcomed.	Answer noted. No change proposed. It is considered that Local Authorities can continue to require requirements related to climate change that exceed the building regulations as the building regulations will not result in net zero construction in time to achieve Reading’s 2030 target. The policies proposed do not seek to duplicate the Building Regulations. Local policies aim to ensure that sustainable design and construction requirements result in new buildings that are truly net zero as soon as possible without affecting viability.									
Stantec (OBO UoR)	No answer	<p>Water The University is supportive of the aims to minimise water consumption in water-stressed areas and the rationale for using a fittings-based approach. However, the target for water neutrality requires clarification to be effective. Clarification should be provided in terms of scope (potable versus non-potable water consumption), calculation methodology and the proposed offsetting measures. For example, a development may collect rainwater via rainwater harvesting to reduce its total water consumption, but this cannot be made available as potable water on site, therefore adequate options for offsetting need to be made available to achieve water neutrality at a building scale.</p> <p>Operational Energy The University suggests that it would be preferable to create a single policy dealing with operational energy for all building types as opposed to the targets being split between two policies (CC2 and H5). The proposed policy states that all non-residential development proposals must achieve energy efficiency targets for space heating, total heating demand and to achieve on site net zero by the provision of on site renewable energy for the residual energy demand. Currently the wording is broad and therefore includes change of use and extensions as well as new non-residential development. For new non-residential development, the targets for space heating are comparable to those set out by the Low Energy Transformation Initiative (LETI) Climate Emergency Design Guide and the RIBA 2030 Climate Challenge for commercial offices and schools. The site average total demand is slightly more relaxed than the LETI requirements (as defined for Commercial Offices and Schools, Total Energy Consumption). The targets are considered in line with LETI best practice however LETI does not provide best practice targets for other use types such as retail and industrial, the University therefore supports the “exceptional basis clause” for cases where the targeted performance cannot be met for technical, viability or other policy reasons. LETI6 best practice targets for operational energy are defined for commercial offices and schools, as follows:</p> <table border="1" data-bbox="344 1206 1458 1310"> <thead> <tr> <th>Building Type</th> <th>Space Heating</th> <th>Total Energy Consumption / Energy Use Intensity (EUI)</th> </tr> </thead> <tbody> <tr> <td>Commercial Offices</td> <td>15 kWh/m2/yr</td> <td>55 kWh/m2/yr</td> </tr> <tr> <td>Schools</td> <td>15 kWh/m2/yr</td> <td>65 kWh/m2/yr</td> </tr> </tbody> </table> <p>To improve effectiveness, the University suggests that the proposed policy is developed to include energy targets for different development types within the overall categorisation of non-residential, due to the differing requirements for</p>	Building Type	Space Heating	Total Energy Consumption / Energy Use Intensity (EUI)	Commercial Offices	15 kWh/m2/yr	55 kWh/m2/yr	Schools	15 kWh/m2/yr	65 kWh/m2/yr	<p>Noted. Change proposed to define water neutrality as follows: “Water neutral development is development which does not increase the rate of water abstraction for drinking water supplies above existing levels. For every new development, water demand should first be minimised and then any remaining water demand offset, so that the total demand on the public water supply is the same after development as it was before.”</p> <p>In terms of operation energy, it is considered that broad language to include change of use and extensions as well as new non-residential development paired with an exceptional basis clause to account for case-by-case considerations is the best way to achieve energy efficiency targets and reduce total energy use. Although we agree with the LETI best practice targets and these have been used to inform our proposed policies, prescribing energy targets for different development types is considered to be too prescriptive for inclusion within the policy itself. A change has been proposed to refer to the LETI guidance as a good source for applicants.</p> <p>Change proposed to amend proposed policy to align with Central Lincolnshire’s and refer to “reasonable estimates” of regulated and unregulated sources.</p>
Building Type	Space Heating	Total Energy Consumption / Energy Use Intensity (EUI)										
Commercial Offices	15 kWh/m2/yr	55 kWh/m2/yr										
Schools	15 kWh/m2/yr	65 kWh/m2/yr										

	<p>building typologies and users. For example, Leeds City Council Local Plan update⁷ (Regulation 19, October 2023) put forward targets by type (housing, commercial, leisure, industry, research facility). Alternatively, Central Lincolnshire⁸ provide guidance on how proposals will be considered in the context of different building uses and where a particular building type may not be able to achieve the stated targets.</p> <p>The University suggests that the current wording of the requirement to achieve on site net zero operational energy for new non-residential development for regulated and unregulated energy “on an annual basis using a methodology that is accurate for forecasting post-occupancy performance” should not be supported as the estimation of unregulated energy is currently not established as an accurate methodology. As an alternative approach, Central Lincolnshire policy wording states that ‘reasonable estimates’ of regulated and unregulated should be met through on-site renewable energy sources. The requirement for achieving net zero operational energy for regulated energy is in line with similar policies and is supported.</p> <p>The achievement of energy targets and net zero carbon through renewables for change of use and extensions is likely to be challenging to achieve and, in some cases, will not be practicable. For example, achievement of on-site renewable energy generation to balance demand may not be feasible or viable depending on the scope for reducing energy demand through fabric improvements combined with the availability of space for new renewable energy generation technology.</p> <p>The scope of the “exceptional basis clause” regarding the provision of a financial contribution to the LPA of a value sufficient enough to offset the remaining performance not achieved on site should be clarified to confirm the pricing mechanisms and timeframes that will be deployed for calculation. The policy is proposing energy-based metrics however there are no established precedents for performance offsetting based on energy-based metrics. Therefore, clarification is required to understand if the offsetting is to be assessed against energy-based performance or another aspect of performance (carbon, for example) and if so, what the related targets are.</p> <p>The potential energy offsetting mechanism proposed by RBC is different to a carbon offset scheme as it requires financial contribution for any operational energy demand which is expected to be met by the national grid, irrespective of associated carbon emissions. For example, the draft Warwick Net Zero Carbon DPD proposes a carbon offset price of £245 per tonne CO₂, where the price is linked to the annual Treasury Green Book BEIS projections. Allowance is made for the national grid decarbonisation trajectory, so that the amount of carbon to offset in year 30 will be significantly lower than year 1, reducing the total cost of the carbon offset payment. No such allowance is made within the draft policy text proposed by RBC. The University suggests this policy is not supported, and that financial contributions should be linked to residual carbon emissions, and not energy demand.</p> <p>Waste The requirement for provision of a justification for demolition should be accompanied by guidelines to indicate what would constitute a satisfactory justification, including specifying a methodology for assessment, quantification and reporting to enable effective and consistent decision-making. The requirement that 95% of construction waste will be diverted from landfill is reasonable. It should be noted that construction waste is a specific waste type, as distinct from demolition and excavation waste types.</p> <p>Embodied Carbon The embodied carbon target for new build commercial floorspace (less than 800kg/sqm for schemes of 5000m² or more) is slightly more relaxed than LETI Climate Emergency Design Guide for office and retail buildings and is in line with planning precedent elsewhere, and therefore the University is supportive of this policy. The scope (building modules referred to) should be clarified for alignment with an industry standard methodology. In addition, the University would encourage the specification of a methodology for the assessment of embodied carbon and whole</p>	<p>In cases where achievement of energy targets and net zero carbon for changes of use and extensions is not possible, the exceptional basis clause will be employed to ensure that the highest level of sustainable design and construction standard possible is being met.</p> <p>Because the cost of delivering renewable energy infrastructure is everchanging, the proposed policy seeks to avoid specific pricing mechanisms. Each application will be considered on a case-by-case basis and allow the applicant to enter into an appropriate legal agreement to provide a contribution of a value sufficient to enable Reading Borough Council to offset the remaining emissions. Change proposed to clarify that as the grid is decarbonised, financial contributions will be linked to residual carbon emissions, rather than energy demand. Change proposed to specify that a contribution must be at least £5k and a maximum of £100k per 1,000 sq. m.</p> <p>In terms of waste, change proposed to add further detail with regard to justification for demolition.</p> <p>Change proposed to refer to the RICS Professional Standard Whole Life Carbon Assessment as a preferred methodology.</p> <p>Again, in terms of prescribing specific targets based on building and development type, the Council considers that it is most effective to avoid being overly prescriptive. Each case will be considered individually and where stringent energy efficiency targets are not feasible or viable the exceptional basis clause will be employed to ensure the highest possible standards are met.</p>
--	---	--

		<p>lifecycle emissions. The University would expect this to be based on RICS Professional Standard Whole life carbon assessment for the built environment (version 2).</p> <p>The University proposes that clarification is provided on development types, to clearly distinguish between major development that include change of use or extensions, and between major development that constitutes only new development. Comparable emerging plans, including the Leeds City Council Local Plan Update are explicit in identifying the building and development type to which targets apply. This is of particular importance for both energy efficiency and embodied carbon measures, where retrofitting to achieve energy efficiency in line with best practice standards for new development may not be feasible or viable.</p>	
Stantec OBO SEGRO	No answer	<p>Paragraph 157 of the NPPF indicates that the planning system should support the transition to a low carbon future. Policy CC2 (Sustainable Design and Construction) of the Scope and Content (Regulation 18) consultation sets out sustainable design and construction requirements for the construction of new non-residential buildings. Paragraph 5.9 goes on to list the proposed changes and updates to Policy CC2. It is considered that the feasibility and viability of the proposed changes within the policy has not been tested. The proposed changes to the policy for example include requirements such as “<i>all development must achieve water neutrality.</i>” It is considered that specific requirements like this will not be feasible or viable for development uses such as employment. SEGRO support the ambitious approach taken by RBC, however, it is considered that the policy needs to be worded more realistically and make reference to the consideration of sites on a site by site basis. As such, SEGRO consider that the Policy should be updated but with less ambitious requirements for target emission rate reduction, as set out at paragraph 5.10.</p>	<p>Noted. The approach pursued by the proposed policies has been employed by other LPAs across the country and will be tested through the Whole Plan Viability Study. In cases where policy requirements are not feasible or viable, the highest possible standards will be sought. The exceptional basis clause aims to ensure that applications are considered on a site-by-site basis. Unless the most ambitious requirements are sought in the first instance, Reading will fail to achieve its 2030 net zero target.</p>
Tricia Marcouse	No answer	<p>Yes to existing proposals as an achievable goal.</p>	<p>Answer is noted. No changes required.</p>
Montagu Evans (OBO Abrdn)	No answer	<p>The proposed amendments refer to uncertainty around the building regulation standards and the timescales to the targeting of net zero and discuss the potential of imposing Reading specific policy targets. As reflected in the approach now adopted in the London Plan it is very difficult to deliver net zero ready buildings. As such it is our opinion that the Council should be led by the Building Standards, and not seek to provide their own policy target which could overburden development.</p> <p>The policy update seeks to include a requirement to for both major and minor non-residential development to achieve BREEAM 'Excellent'. Whilst we understand the aspiration to reach high standards of design and build quality, we would welcome the inclusion of some flexibility to use other industry accepted sustainability recognition schemes such as Passivhaus. The proposed policy changes prevent this.</p>	<p>No change proposed. The Building Regulations' reliance on measuring emissions rather than use of energy-based metrics have been judged by industry professionals to fail to achieve net zero construction. According to LETI, a 100% reduction in CO₂ emissions using the building regulations methodology is not zero carbon and simply achieves a reduction in regulated emissions against a notional building specification.</p> <p>In an effort to avoid placing undue burden on developers, the exceptional basis clause will be employed to ensure flexibility and viability. The clause explicitly refers to “equivalent certification methods” to provide flexibility for applicants who wish to use other schemes.</p>
Savills (OBO Sorbon Estates Ltd)	No answer	<p>The LPPU consultation document (paragraphs 5.9) proposes that Local Plan Policy CC2 is updated with several changes. These include changes to clarify that ‘all development must achieve water neutrality’ and that ‘applicants should achieve net zero development’ through the application of the energy hierarchy, with the addition of an ‘exceptional basis clause’ where these standards cannot be met for technical, viability or other policy reasons.</p> <p>The broad approach of updating policies to ensure development proposals achieve a high level of sustainability and support the Council's aim to be a net zero borough by 2030 is welcomed.</p>	<p>Answer noted. No change proposed. It is considered that Local Authorities can continue to require requirements related to climate change that exceed the building regulations as the building regulations will not result in net zero construction in time to achieve Reading's 2030 target. The policies proposed do not seek to duplicate the Building Regulations. Local policies aim to ensure that sustainable design and</p>

		<p>It is however important to ensure that policy guidance relating to climate change is clearly written and does not include unnecessary duplication (as per paragraph 16 of the NPPF (2023) with building regulations requirements or other policy requirements. It is noted for instance, that Policy H5 also requires 'new build housing to be net zero carbon' and 'newbuild housing be designed to achieve water neutrality', although with the addition of an 'if possible' clause. The addition of an 'exceptional basis clause' is welcomed although further clarification is recommended as to when and how this may apply.</p> <p>It should also be noted that Housing and Planning Minister Lee Rowley recently announced in a Written Ministerial Statement on the 13th of December 2023 that any policies that propose local efficiency targets beyond current or planned Building Regulations should be rejected at the examination if they do not have a well-reasoned and robustly costed rationale. Therefore any proposed uplifts should be tested carefully and not duplicate building regulations to ensure consistency and certainty across the development industry.</p> <p>Whilst Policies CC2 and CC5 set out requirements for development to be 'net zero carbon', the LPPU consultation also includes separate references to 'zero carbon homes'. Consistent terminology should be used throughout LPPU to ensure policies are clear and avoid any risk of contradictions. To avoid confusion, we suggest the use of the term "net zero carbon" be used fully throughout, as this is more widely understood in the industry and aligns with national net zero definitions.</p>	<p>construction requirements result in new buildings that are truly net zero as soon as possible without affecting viability.</p> <p>It is considered that the 13th Dec 2023 WMS is subservient to statute and that Local Plans are still expected to include policies which address climate change under Section 19(1A) of the Planning and Compulsory Purchase Act 2004, the Climate Change Act 2008 and the Planning and Energy Act 2008. Thus, the WMS cannot undermine the primary powers of local authorities to act or go against their duty to mitigate climate change.</p> <p>Change proposed to use the term 'net zero carbon' throughout the document for consistency.</p>
<p>The Planning Bureau on behalf of McCarthy Stone</p>	<p>N</p>	<p>It appears that the Council aspires to carbon neutrality / zero carbon in the Borough by 2030. Whilst the Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that may go beyond government targets. However, it is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations.</p> <p>This approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from Written statements - Written questions, answers and statements - UK Parliament) released on 13th December 2023. The ministerial statement confirms, with respect to the net zero goal that:</p> <p>'The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale' and 'To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, including this one'.</p> <p>The Council should therefore re-consider the policy area to ensure requirements are not going beyond government targets.</p>	<p>Answer noted. No change proposed. It is considered that Local Authorities can continue to require requirements related to climate change that exceed the building regulations as the building regulations will not result in net zero construction in time to achieve Reading's 2030 target. The policies proposed do not seek to duplicate the Building Regulations. Local policies aim to ensure that sustainable design and construction requirements result in new buildings that are truly net zero as soon as possible without affecting viability.</p> <p>It is considered that the 13th Dec 2023 WMS is subservient to statute and that Local Plans are still expected to include policies which address climate change under Section 19(1A) of the Planning and Compulsory Purchase Act 2004, the Climate Change Act 2008 and the Planning and Energy Act 2008. Thus, the WMS cannot undermine the primary powers of local authorities to act or go against their duty to mitigate climate change.</p> <p>Change proposed to use the term 'net zero carbon' throughout the document for consistency.</p>

Q. 8 Do you agree that we should update policy CC3 as described? Are there other changes that are required?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Mark Treder	Other	As above	See officer response to Q. 6.
Paul Oliver James Melville	N	as above	See officer response to Q.6.
Anthony Acka'a	Y	It makes sense for it to be updated to include the current strategies.	Answer is noted. No changes required.
CADRA	Y	Yes, but we suggest an additional reference to the forthcoming updated Climate Strategy.	Change proposed to include reference to the Climate Emergency Strategy.
Natural England	Other	Agree to the updating of CC3 as described. However, text for CC9 notes the Government has announced its intention to phase out topic-based Supplementary Planning Documents and remove their status and weight in decision-making. Reassurance will be required to show how the Biodiversity and Natural Environment SPD will be incorporated into the new planning framework with appropriate weight. The Biodiversity and Natural Environment SPD should be informed by the Natural England Green Infrastructure Framework.	Noted. Policy EN12 is being updated to ensure that Biodiversity requirements are appropriately addressed should the SPD lose status during the plan period.
Sport England	Y	NB the SPD guidance published in 2019, does need to be kept under review to ensure the latest best practice is followed to ensure policy CC3 is kept robust.	Noted. A Biodiversity and Natural Environment SPD is due to be produced in due course, and any update to the Sustainable Design and Construction SPD could only progress once the Local Plan Partial Update is adopted.
CAAC	No answer	Since the adoption of the New Local Plan in 2019 the available acceptable solutions for climate change adaptation for heritage assets have increased. The opportunity should be taken to set out a clearer direction for investigating these possibilities. Updated Historic England Advice was consulted on at the end of 2023 but has not yet been published. (link to consultation draft https://historicengland.org.uk/content/docs/guidance/climate-change-historic-building-adaptation-consultation-draft/) With the phasing out of topic based SPDs consideration should be given to expanding the wording within the explanatory paragraphs in relation to the contents of the Sustainable Design and Construction SPD.	Agree, but no change proposed to CC3. CC2 and H5 are being updated to ensure that latest advice from HE is incorporated.
HBF	No answer	It is not clear whether the proposed changes are to be included in the policy or supporting text. The HBF would suggest that references to strategies should be solely made within the supporting text and not the policy itself which should be reserved for matters relating to decision making.	Noted. Both the policy and supporting text are being updated. References to strategies will remain within the supporting text.
Reading Friends of the Earth	Y	It is good on flooding. Should be more on overheating – particular risks of heat island effect for town centre development – should integrate cooling with heat pump and heat network systems to replenish underground heat sources. Water conservation should have more attention – local storage of grey water could benefit both water supplies in drought and heat storage for heat pumps in winter and summer.	Noted. Change proposed to emphasise the importance of addressing overheating. Water conservation is addressed in CC2 and H5.
Historic England	No answer	We will be interested to review the revised policy CC3 and its supporting text. As stated in our answer to question 6, one aspect we encourage the Council to consider is the sensitive retrofit of traditionally constructed buildings, taking a whole building approach, informed by heritage expertise. By taking such an approach, the risks of maladaptation are reduced.	Noted. Change proposed to CC2 and H5 to refer to the sensitive retrofit of traditionally constructed buildings in the supporting text following further discussions between RBC and HE.
Savills OBO Viridis	No answer	The LPPU consultation document (paragraphs 5.14) proposes that Local Plan Policy CC3 is updated to include reference to other sustainability guidance and strategies, including the Climate Emergency Strategy (2020), Sustainable Design and Construction SPD (2019) and Climate Change Adaptation Plan (2019), which include further details on climate change mitigation. As set out above, the broad approach of updating policies to include greater emphasis on climate change mitigation and support to the Council's aim to be a net zero borough by 2030 is welcomed. It will however be important to ensure	Noted. The proposed changes to CC3 do not include unnecessary duplication and are consistent with the NPPF.

		that the specific proposed updates to Policy CC3 are consistent and do not include unnecessary duplication, as per paragraph 16 of the NPPF (2023).	
Stantec (OBO UoR)	Y	<p>The University supports the amendment of policy CC3 to provide greater alignment with other existing and relevant documentation.</p> <p>RBC recognise the greater emphasis placed on the need for new developments to adapt to the effects of climate change by the NPPF is also reflected RBC guidance including the Reading Climate Emergency Strategy (2020) and in current and forthcoming Supplementary Planning Documents (SPDs).</p> <p>The changes proposed to this policy through the LPPU consultation document are primarily to incorporate references to relevant documents, including the RBC Sustainable Design and Construction SPD9 (2019), the Reading Climate Change Adaptation Plan10 and to amend language to give greater weight to climate change mitigation.</p>	Noted. No change needed.
Stantec OBO SEGRO		<p>SEGRO are committed to tackling climate change with the aim of being net-zero carbon by 2030. SEGRO is committed to playing their part in tackling climate change and have their own corporate commitments in 'Responsible SEGRO' Framework. Through this SEGRO will play a leading role in their industry's response to the low carbon imperative by setting demanding targets and is committed to working with their customers and suppliers to reduce their emissions.</p> <p>The proposed changes to Policy CC3 (Adaptation to Climate Change) are set out at paragraph 5.14. The proposed changes include the use of additional language to give greater weight to climate change mitigation and acknowledgement that the strategies will continue to evolve during the Local Plan process. Taking these proposed changes into account, SEGRO request that the wording of Policy CC3 and the proposed strategies include flexibility to allow targets and requirements to be negotiated on a site by site basis. This would ensure that consideration towards the feasibility and viability of proposed climate change mitigation measures would have regard to a sites context.</p>	Noted. No change proposed. It is considered that the policy includes sufficient flexibility to ensure viability. Each application is considered on a case-by-case basis and applicants are given flexibility in demonstrating how they will design for adaptation.
Savills (OBO Sorbon Estates Ltd)	No answer	<p>The LPPU consultation document (paragraphs 5.14) proposes that Local Plan Policy CC3 is updated to include reference to other sustainability guidance and strategies, including the Climate Emergency Strategy (2020), Sustainable Design and Construction SPD (2019) and Climate Change Adaptation Plan (2019), which include further details on climate change mitigation.</p> <p>As set out above, the broad approach of updating policies to include greater emphasis on climate change mitigation and support to the Council's aim to be a net zero borough by 2030 is welcomed. It will however be important to ensure that the specific proposed updates to Policy CC3 are consistent and do not include unnecessary duplication, as per paragraph 16 of the NPPF (2023).</p>	Noted. The proposed changes to CC3 do not include unnecessary duplication and are consistent with the NPPF.
The Planning Bureau on behalf of McCarthy Stone	N	See answer to question 7.	Please see response under question 7.
The Woodland Trust	Y	Strongly support this update, in particular the encouragement of green infrastructure as part of the climate response.	Answer is noted. No changes required.
Graham Bates	Y	It is plain from recent plans that developers are ignoring CC3 as it stands since I cannot remember them including green walls or roofs etc.	CC3 does not require green roofs or walls, rather it lists these measures as possible examples of adaptation measures. Applications are required to incorporate measures to adapt to climate change, but the policy does not require specific interventions. It is considered that the increased

			requirements for biodiversity net gain on-site with result in more green walls and roofs and that each application will be considered on a case-by-case basis to ensure that all possible necessary adaptation measures have been considered.
--	--	--	---

Q. 9 Do you agree that we should update policy CC4 as described? Are there other changes that are required?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Mark Treder	Other	As above	See officer response to Q. 6.
Reading Climate Action Network	Y	Yes, this is excellent	Noted. No change needed.
Paul Oliver James Melville	N	as above	See officer response to Q. 6.
Sport England	Y	NB Playing fields can have another use; by installing ground source heat pumps and the plant required at the edge of playing fields, they can become district heating centres for the immediate housing. The DoE are currently investigating this model for several new schools in different parts of the country.	Answer noted but no change proposed. The policy does not seek to specify specific technologies.
Reading Friends of the Earth	No answer	Decentralised Energy – need more on preparedness for future heat networks and local zones https://www.pbctoday.co.uk/news/energy-news/energy-act-2023-heat-networks/136527/ - where is the detail on this to be included? Reinforce electricity grid to cope with local generation and demand for heat pumps and electric vehicles. Integrate cooling with heat pump and heat network systems.	Noted. No change needed. The policy refers to the importance of decentralised energy and on-going efforts in Reading to drastically expand heat networks. RBC is also working closely with SSE to ensure sufficient grid capacity for the net zero transition.
Historic England	No answer	I suggest considering adding a reference to the potential for archaeological remains to support use of relevant policy and the archaeological notification areas, noting: <ul style="list-style-type: none"> interest in establishing a district heating network; the increasing focus for development on central Reading; and the extent of the archaeological notification priority area in central Reading. 	Noted. No change proposed. These matters are sufficiently addressed by EN2: Areas of Archaeological significance.
Savills OBO Viridis	No answer	The LPPU consultation document (paragraphs 5.19) proposes that Local Plan Policy CC4 is updated to include strengthening of requirements relating to decentralised energy, with suggested wording proposed as 'must connect to a decentralised energy source unless this is not suitable, feasible or viable.' This overall proposed approach aligns with the NPPF 2023 (paragraph 160), which supports the identification of 'opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-location potential heat customers and suppliers.' However, the suggestion that development 'must' connect to a decentralised energy source is overly prescriptive and there is a lack of detail provided as to the circumstances when this requirement would not be sought. It is important to ensure that factors such as the scale of development, density, location or type of land use are fully taken into account in determining the suitability and appropriateness of connecting to a decentralised energy source, as well as ensuring that the source fully contributes to decarbonisation. The wording of the updated policy must therefore incorporate flexibility and be fully evidence-based in line with the NPPF (2023).	No change proposed. Sufficient flexibility is provided by "unless this is not suitable, feasible or viable."

Stantec (OBO UoR)	No answer	<p>The Reading Climate Emergency Strategy requires RBC to work with developers to maximise district energy solutions in line with Local Plan policies to establish district heating, investigate the potential of water environments in Reading for renewable heat, implement heat pump schemes and develop skills of local installers.</p> <p>New legislation for Heat Network Zoning will designate areas for new heat networks and allow the local authority to enforce requirements. Further guidance is awaited.</p> <p>Changes proposed to policy CC4 include the incorporation of references to the Climate Emergency Strategy, to amend language to strengthen requirements and to incorporate work on the establishment of district heat networks as they progress.</p> <p>The requirements in policy CC4 are mainly to encourage and facilitate opportunities for major developments to incorporate decentralised energy where possible. The University notes that work is ongoing to designate areas for new heat networks and develop local authority mechanisms to enforce requirements. The University would welcome the opportunity to contribute to the shaping of requirements in terms of location and performance as members of the Reading Climate Action Partnership.</p>	Noted. No change needed.
Stantec OBO SEGRO	Y	<p>Paragraph 162 of the NPPF advises that local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy, unless it can be demonstrated by the applicant that it is not feasible or viable.</p> <p>Policy CC4 (Decentralised Energy) of the Scope and Content (Regulation 18) consultation proposes that opportunities for decentralised energy within major developments are identified and incorporated where possible. The proposed changes to Policy CC4 are listed at paragraph 5.19. One of the proposed changes includes the use of additional language “to strengthen the requirements (i.e. must connect to a decentralised energy source unless this is not suitable, feasible or viable.” SEGRO support the flexibility within the policy. This will ensure that the feasibility and viability of including decentralised energy can be considered on a site by site basis, subject to the necessary testing and evidence.</p>	Noted. No change proposed.
Montagu Evans (OBO Abrdn)	No answer	<p>We acknowledge that there can be some benefits to a decentralised energy network, we would highlight that there are significant barriers to the delivery of such a network and such system are often based on gas fired boilers. Due to this there has been a move from the industry away from the decentralised approach especially as there can be greater carbon savings provided by on site solutions such as PV, GSHPs or ASHPs, coupled with better building design. The policy needs a thorough review to assess whether the current preference for decentralised energy should be removed.</p>	No change proposed. Given the recent assent of the Energy Act 2023 which provides the basis for the growth of heat networks in the UK, inclusion of a decentralised energy policy is consider appropriate. Each site will be assessed on a case-by-case basis and heat network connection will not be pursued if not suitable, feasible or viable. If on-site solutions provide greater carbon savings, this will be pursued through policies CC2 and/or H5.
Savills (OBO Sorbon Estates Ltd)	No answer	<p>The LPPU consultation document (paragraphs 5.19) proposes that Local Plan Policy CC4 is updated to include strengthening of requirements relating to decentralised energy, with suggested wording proposed as ‘must connect to a decentralised energy source unless this is not suitable, feasible or viable’.</p> <p>This overall proposed approach aligns with the NPPF 2023 (paragraph 160), which supports the identification of ‘opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-location potential heat customers and suppliers.’ However, the suggestion that development ‘must’ [our emphasis] connect to a decentralised energy source is overly prescriptive and there is a lack of detail provided as to the circumstances when this requirement would not be sought.</p>	It is unclear how the suggested wording which includes “unless this is not suitable, feasible or viable” fails to provide sufficient flexibility. No change proposed.

		It is important to ensure that factors such as the scale of development, density, location or type of land use are fully taken into account in determining the suitability and appropriateness of connecting to a decentralised energy source, as well as ensuring that the source fully contributes to decarbonisation. The wording of the updated policy must therefore incorporate flexibility and be fully evidence-based in line with the NPPF (2023).	
Aubrey Blazey	N	It doesn't fully cover investigating de-centralizing electricity and local generation. What options will be available for local energy storage?	Change proposed to refer to local energy storage.
Graham Bates	Other	Has the Climate Emergency Strategy (2020) been followed fully since 2020? If it hasn't already it is unlikely to be in future. Developers will always find an excuse and you have given them another with "unless this is not suitable, feasible or viable".	According to the NPPF, policies within the Local Plan must ensure sufficient flexibility to enable development that is considered sustainable.

Q. 10 Do you agree that we should update policy CC7 as described? Are there other changes that are required?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Henry Wright	N	Update but add additional guidance on a preference for mixed use (e.g. ground floor shops) and primarily brick based cladding where possible. This is often referred to as a Modern London Vernacular.	Preference for mixed uses where appropriate is included in the bullet point "uses – ensures uses are mixed and integrated, including a range of local services and facilities to support daily life." It is considered that requiring brick cladding broadly is overly prescriptive. Proposals that comply with the design guidance is likely to include brick often, as this would reflect the existing identity of Reading.
Christian Harris	N	No comments	Answer is noted.
Mark Treder	Other	As above	See officer response to Q. 6.
Paul Oliver James Melville	N	as above	See officer response to Q. 6.
CADRA	No Answer	We note the changes in national policy.	Answer is noted.
Natural England	Y	Agree, update CC7 as described.	Answer is noted.
Damians Bramanis	Y	Yes, I support the proposed change. I also would propose the addition of a characteristic of non-commercial public space - I would welcome more playgrounds, parks, greenspace, gardens or other areas that can be enjoyed without spending money or being advertised to. I feel that these types of spaces are being eroded away - either being developed upon to convert them to commercial spaces, by removing greenspace, or by introducing advertising like the "Reading Lights" advertising display.	No change proposed. Provision of playgrounds, parks, greenspace, gardens and other shared public spaces is informed by other policies within the Local Plan. That being said, the principles of CC7 aim to deliver spaces which can be enjoyed by members of the public.
Sport England	Y	We would add that you also want to create Active Environments within this policy. We suggest you may wish to reference our Active Design. Where we live, work, travel and play has a major role in shaping our activity choices. By applying Active Design's 10 principles to our built and natural environments, we can create active environments that encourage people to be active through their everyday lives.	Answer is noted. No change proposed. It is considered that the proposed policy language encourages active environments by requiring that "development promote activity" and ensuring that the built form is compact and walkable with access to facilities, services and public transport.

		With a shared belief and commitment to the great value that well designed places can have on health and wellbeing, we've worked with Active Travel England (ATE) and the Office for Health Improvement and Disparities (OHID) to produce this updated version of the Active Design guide. https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design	
Historic England	No answer	We would be interested to learn about the Council's plans for a new design code in due course. Noting the Levelling Up and Regeneration Act 2023's requirements for an authority-wide design code, paragraph 130 of the NPPF (December 2023) and the government's consultation outcome, I emphasise the importance of local context, which includes the historic environment. The government's consultation outcome states that "We expect character considerations to be included as part of the process for preparing an authority-wide design code."	Noted. The Council intends to publish design code(s) as required in due course.
Savills OBO Viridis	Y	The proposed approach (set out at paragraph 5.23 of the LPPU consultation document) to update Local Plan Policy CC7 based on the National Design Guide and National Model Design Code is welcomed. It will also be important to ensure that the updated policy aligns with recent updates made in the NPPF in December 2023 following the commencement of consultation. However, any unnecessary duplication with wider national policy guidance should be avoided, as per paragraph 16 of the NPPF (2023).	Noted. No change proposed.
Opus Works (OBO Moda Living)	No answer	As set out above, Moda strongly advocates policy that underpins the creation of well-designed places and neighbourhoods. A residents guide - Moda Sustainable Living Guide embodies an essential element of the 'Moda Way', which together with a strong focus on high-quality design enables the creation of award-winning residential communities. The changes to Policy CC7, which refer to the detail of NPPF Paragraphs 128 a) and b) and Section 12 in respect of achieving well-designed places are consistent with our client's approach to planning and development.	Noted. No change proposed.
Stantec (OBO UoR)	Y	The University supports good design to comply with the requirements of chapter 12 of the NPPF. It supports updating policy CC7 to reflect the principles set out in the National Design Guide and National Model Design Code as well as the current text within section 12 of the NPPF. This will ensure consistency with national policy and provide clarity on the design standards for proposed development.	Noted. No change proposed.
Savills (OBO Sorbon Estates Ltd)	Y	The proposed approach (set out in paragraph 5.23 of the LPPU consultation document) to update Local Plan Policy CC7 based on the National Design Guide and National Model Design Code is welcomed. It will also be important to ensure that the updated policy aligns with recent updates made in the NPPF in December 2023 following the commencement of consultation and provides enough flexibility to respond to site-specific circumstances and context. However, any unnecessary duplication with wider national policy guidance should be avoided, as per paragraph 16 of the NPPF (2023).	Noted. No change proposed.
The Woodland Trust	Y	Support this change as it relates to a greater priority for natural features. The policy could usefully make explicit reference to the Borough Tree Strategy and the NMDC aspiration for tree-lined streets.	Noted. Change proposed to refer to the importance of tree-lined streets and the Council's Tree Strategy in the supporting text.
Aubrey Blazey	Y	It would be simpler to take a copy of Netherlands planning proposals ... documents dont cover tree planting as far as i can see - it just says that things should "enhance" the area ..	Noted. Change proposed to refer to the importance of tree-lined streets and the Council's Tree Strategy in the supporting text.
Graham Bates	Other	"Reflect local character and the design preferences of local residents... positively address environmental issues affecting the climate.... enhances the surroundings based on a sound understanding of the features of the site and its surroundings and is responsive to local history, culture and heritage... Development should employ appropriate scale, reducing the need for redevelopment... Lifespan – ensures development is made to last..." Projects are already planned at Napier Road and along Vastern Road which do not fulfil the above and will render the policy redundant - until they are next redeveloped in 30 years' time since that appears to be their lifespan. Again, it's not happening now so how will any grand aims work in future?	The proposed policy aims to require high design standards of schemes coming forward after the adoption of the updated Local Plan. Changes to this document cannot be applied to applications previously permitted.

Additional representations submitted via email regarding policy CC7

Respondent name	Comments	RBC Officer Response
Berkshire Gardens Trust	Yes but we believe that there should be a requirement to ensure the proper provision of green open space within each area in order to achieve Reading's landscape, ecological and historical objectives and ensure proper provision for local residents. This approach is currently being undermined by development on individual plots without an overall plan for each to ensure proper provision of green open space across the centre of Reading. The lack of new open green space risks further pressure on the historic parks and gardens within the town.	Noted. This change is not within the scope of CC7 as provision on new green open space is addressed by other policies within the Plan. The requirements of policy CC7, however, aim to optimise nature through new and existing natural features to create a network throughout the Borough.
TVP	Insert the word 'Safe' into the paragraph to ensure all buildings, but in particularly those designed for communal living, consider how crime needs to be addressed to prevent it from flourishing and impacting residents. 'Homes and buildings – creates homes and buildings which are functional, healthy, safe and sustainable with good quality internal and external environments to promote health and well-being'	Change proposed.
Savills (OBO Beechcroft Developments Ltd)	See response to Q. 26	Noted. No change proposed.

Q. 11 Do you agree that we should update policy CC9 as described? Are there other changes that are required?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Mark Treder	Other	As above	See officer response to Q. 6.
Reading Climate Action Network	Y	Yes. The changes to the CIL are beyond my expertise but I strongly support the inclusion of requirements to develop relevant skills	Noted. No change needed.
Paul Oliver James Melville	N	as above	See officer response to Q. 6.
CADRA	No Answer	We note the changes in national policy.	Answer is noted.
Natural England	No Answer	No comment, as long as 'Open space, green infrastructure and other measures to improve or enhance biodiversity' remains 2nd on priority list.	Answer is noted. No change proposed.
Sport England	Y	but you do need to have robust evidence bases if you are going to do this.	Answer is noted. Upon submission, the Local Plan will be supported by a robust evidence base.
CAAC	No answer	As an organisation we are very keen to see the encouragement locally of training in heritage building and craft skills to work on Reading's older properties as well as heritage assets. We would like the wording of the bullet point starting 'State that certain applicants...' to include specific mention of the skills appropriate to working on older properties and heritage assets.	Noted. No change proposed. It is not considered appropriate to cite a specific training or skill within this policy.
Reading Friends of the Earth	Other	Agree funding measures should be kept up to date and employment and skills are important. Would like to see more on Heat Networks, Heat Storage, capacity and resilience of electricity supplies (cables, transformers, switchgear, batteries, emergency gas-fired generation).	Noted. These measures are required by other policies within the Local Plan, notably CC2, CC3, CC4 and H5.
Historic England	No answer	We encourage the local plan to make explicit that cultural infrastructure, already mentioned in policy CC9 and in the section on Infrastructure Delivery, includes heritage assets at risk. This has the potential to impact the future of assets such as the remains of Reading Abbey Scheduled Monument.	Noted. No change proposed. It is not considered appropriate to cite heritage assets at risk within this policy as it is too prescriptive. As this policy

			aims to be broad with regard to all employment and skills, heritage assets are best addressed through existing policies within the Local Plan, notably EN1 – EN6.
Stantec (OBO UoR)	Other	The University supports the principle of development funded infrastructure where infrastructure is required in order to make a development acceptable. It is recognised that this policy will need to be updated in line with future changes to national policy regarding infrastructure provision through development. The policy must continue to recognise that infrastructure, services, resources, amenities or other assets will be provided either through direct provision or financial contributions as appropriate.	It is not considered appropriate to specify “either direct provision or financial contributions as appropriate” as both may be required in order to make development acceptable in planning terms.
NHS Property Services	No answer	<p>Adopted Policy CC9 Securing Infrastructure seeks to mitigate impact onto existing infrastructure as a result of new developments through securing developer contributions. NHSPS supports this policy but require further amendments to be made as part of the Partial Update to ensure healthcare infrastructure is given the highest priority when seeking developer contributions.</p> <p>The NHS, Council and other partners must work together to forecast the infrastructure and costs required to support the projected growth and development across the borough. A vital part of this is ensuring the NHS continues to receive a commensurate share of S106 and Community Infrastructure Levy (CIL) developer contributions to mitigate the impacts of growth and help deliver transformation plans.</p> <p>Paragraph 34 of The NPPF is clear that ‘Plans should set out the contributions expected from development. This should include setting out... infrastructure (such as that needed for... health)’ The significant cumulative impacts of residential developments on healthcare requirements in the area should be recognised and, given their strategic importance, health facilities should be put on a level footing with affordable housing and public transport improvements when securing and allocating S106 and CIL funds, in order to enable the delivery of vital NHS projects. It is imperative that planning policies are positively prepared, in recognition of their statutory duty to help finance improved healthcare services and facilities through effective estate management. Paragraph 20 of the NPPF is indicative of the focus that should be afforded onto making provision for health facilities, in line and alone with other provisions such as housing, infrastructure for transport and education.</p> <p>While we acknowledge that Health provision is given high priority in the existing policy, other necessary infrastructure is given “highest priority”, we are therefore of the view that health is not currently placed on a level footing with other infrastructure, such as transport infrastructure and education.</p> <p>We request that when setting planning obligation policies, the Council seek to address strategic as well as local priorities in planning obligations by placing the same level of priority for health infrastructure as with other necessary infrastructure (education and transport) and engage the NHS in the process as early as possible.</p>	Noted. Change proposed to give healthcare infrastructure the highest priority.
Graham Bates	Other	As recently as 2014-15, RBC failed to stop a unique 130-year-old plate glass, gold-gilt, town-centre Victorian shop being destroyed so EN1 and EN2 at least aren't enforced and EN18 has only just proven to be ignored. Any updates are as delusional as the original policies.	No change proposed. The Council has a separate Local Planning Enforcement Plan, which deals with matters relating to enforcement.

Additional representations submitted via email regarding policy CC9

Respondent name	Comments	RBC Officer Response
ICB	The proposed changes are mainly due to the forthcoming Infrastructure Levy and the forthcoming legislation changes. The ICB supports Policy CC9 to be identified as one of the strategic policies as it is in line with the NPPF requirement and the provision for infrastructure including primary healthcare facilities is strategic in nature.	Noted. Change proposed to include healthcare provision under “highest priority.”

	<p>The ICB notes that the current wording of Policy CC9 does identify health provision is under a high priority only. This is inconsistent with the findings of the Council's (IDP) dated November 20237. According to the IDP, it clearly sets out that <i>most of the existing surgeries close to or at full capacity. Most of the surgeries are operating in older, converted premises that are no longer fit for purpose and would benefit from relocation to more suitable facilities.</i></p> <p>The ICB considers that health provision should be at the highest priority as the provision of adequate and accessible primary healthcare services is set out under the vision of the Plan and the Sustainability Appraisal. The has the following recommendation on the wording of Policy CC9:</p> <p><i>In determining appropriate provision or contribution, the highest priority will be given to the following:</i></p> <ul style="list-style-type: none"> • <i>Transport infrastructure, including major cross boundary or sub-regional infrastructure projects;</i> • <i>Open space, green infrastructure, and other measures to improve or enhance biodiversity;</i> • <i>Education, including cross-boundary facilities;</i> • <i>Economic development services and infrastructure, including employment, skills and training development initiatives and childcare provision; and</i> • Primary healthcare provision. 	
--	---	--

Chapter 6: Built and natural environment

Q. 12 Do you agree that we should update the built and natural environment policies listed? (EN4, EN7, EN12, EN13, EN14)

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	All pristine green space & all recreational green space left within the borough should be protected & preserved. Development should be restricted to brown field.	No changes proposed. It is not clear how this approach would afford additional protection on such spaces. Policy EN7 already protects designated local green and public open spaces from development. In relation to undesignated open space, policy EN8 confirms that there will be a presumption in favour of its retention. Given the tightly defined urban area of Reading, provision of new housing often involves a heavy reliance on previously developed land and the objective of making efficient use of land in this way is set out in objective 2 of the LPPU. In addition all new nominated sites within the LPPU are on brownfield land.
Mark Treder	Other	No point making a plan, as you cannot stick to it	No change needed. It is noted that there is a legal requirement for planning decisions to be taken in line with the development plan unless material considerations indicate otherwise.
Wiltshire Swifts	Y	They are out of date and not in line with current government policy and the Environment Act. Local Plans should be ambitious and forward thinking to mitigate against them being out of date before adoption.	No change proposed. Do not agree. Local Plan Policies (including EN12) are specifically

			proposed to be updated to be brought in line with the provisions of the Environment Act 2021.
Paul Oliver James Melville	N	<p>Reading has few green areas left due to the mass building of high rise blocks. these will in all probability lead to ghettos and all that entails. More tree planting should take place particularly near brownfield sites. There are no places of outstanding beauty in Reading, unfortunately.</p>	<p>It is noted that there are a number of local green and public open spaces which are protected under policy EN7. Although a few changes are proposed to the boundaries, none of these are to be entirely removed, and indeed there are options for exploring additional local green spaces within the Partial Update, such as the Ibis Club and Scours Lane.</p> <p>Due to the urban nature of the borough, high-density development (such as flats, with communal open space) is required to suit the needs of the residents, as well as family housing to meet housing targets.</p> <p>It is agreed that more tree planting should take place, and policy EN14 is proposed to be updated to include greater emphasis for tree planting on the treed corridors (including main roads, railways, rivers and Green Links), as well as including the headline ambition to increase canopy cover to 25% by 2030, and to ensure no ward has a canopy cover below 12%.</p> <p>Designation of AONB's is not within the Councils remit.</p>
Thames Water	No Answer	<p>EN18: Flooding and Sustainable Drainage In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". We therefore support the reference to sewer flooding.</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximize the capacity for foul sewage to reduce the risk of sewer flooding.</p>	<p>Noted. Change proposed to include reference to sewer flooding.</p> <p>EN18: Flooding and Sustainable Drainage Systems emphasizes the importance of reducing surface water runoff through SuDS.</p> <p>Change agreed to include suggested text regarding drainage to foul sewers.</p>

		<p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: <i>"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</i></p>	
David Pierce	Other	Not reviewed	No changes needed. Information on the proposed changes to the built and natural environment policies can be found in chapter 6 of the LPPU Scope and Content document.
CADRA	N	<p>No. The following policies should also be reviewed: EN3: Enhancement of conservation areas requires significant updating. EN5: PROTECTION OF SIGNIFICANT VIEWS WITH HERITAGE INTEREST – the policy should be revised to maintain a readily available link to the supporting evidence. EN9: PROVISION OF OPEN SPACE With the increasing amount of family accommodation in high rise town centre buildings, this should be strengthened to ensure adequate provision for children and young people. EN11: WATERSPACES Mention should also be included of the need to avoid overshadowing of the water space. The riverbanks are an important feature of the town to be enjoyed by all. The banks of the Thames should not be unduly dominated by residential and should provide leisure and other uses for wide enjoyment.</p>	<p>Minor change agreed. A link to the assessment prepared by CAAC has been added to the footnote of the supporting text at policy EN5.</p> <p>The Local Plan Review carried out in March 2023 reviewed EN3, EN9 and EN11 and did not identify any changes that would result in the need to update this policy.</p> <p>It is unclear what specific changes should be made to EN3 as the Council considers this to be up-to-date. This decision has been informed by discussions with Historic England.</p> <p>It is considered that the requirements of EN9 attempt to strike a balance between delivery the number of homes needed and providing open space for residents, while ensuring that development is viable.</p> <p>The existing policy EN11 already requires development to be set back by ten metres from the watercourse and should make positive contributions to the amenity of the watercourse which is considered to broadly cover the issue of overshadowing. Additionally, limiting residential development along the Thames would seriously impact housing delivery. Each site is assessed on a case-by-case basis and impacts to the</p>

			<p>watercourse considered carefully. Therefore, it is not considered necessary to reopen this policy.</p>
<p>Natural England</p>	<p>Not answered</p>	<p>RBC should also consider updating policies EN8, EN9, EN10 and EN11, with evidence from a robust Green and Blue Infrastructure Strategy, to ensure the multi-functional value of all open space and green and blue features are recognised as part of the green and blue infrastructure network ('Green Network' using Reading Local Plan terminology) and put in place stronger policies for no net loss, and a target of increase and improve green and blue infrastructure within RBC. Natural England has produced the 'Green Infrastructure Framework Principles and Standards for England' The GI Framework helps local planning authorities meet requirements in the NPPF to consider GI in local plans and in new developments and can be utilised when updating local plans and formulating policy.</p> <p>The Natural England Green Infrastructure Framework and Standards are not mandatory but are intended to define what good green and blue infrastructure looks like. We recommend that local plans set out policies to reflect the 5 headline Green Infrastructure Standards, adapting them to the local context. They are summarised as:</p> <ol style="list-style-type: none"> 1) Green Infrastructure Strategy Standard - Local Authorities produce a GI Strategy and Delivery Plan, and major developments provide a Green Infrastructure Plan including accounting for long-term management and maintenance of GI features. 2) Accessible Greenspace Standards – everyone has access to good quality greenspace close to home with a focus on access to greenspace within 15 minutes walk, local authorities have at least 3ha per 1000 population of publicly accessible quality greenspace, and set standards for provision on major developments. 3) Urban Nature Recovery Standard – Local Authorities increase the number and quality of Local Nature Reserves and Local Wildlife Sites, and major developments show how they contribute to nature recovery. 4) Urban Greening Factor – Local Authorities target at least 40% average green cover in urban residential neighbourhoods where they don't already meet that standard, and utilise the National Urban Greening Factor for major developments. 5) Urban Tree Canopy Cover – Tree Canopy Cover is increased by an agreed % with major developments designed to meet these targets, and new and existing trees incorporated into new developments. <p>We recommend RBC consider if the local plan review as proposed, in conjunction with other supplementary planning guidance, sets equivalent local standards.</p>	<p>The Local Plan Review carried out in March 2023 reviewed EN8, EN9, EN10 and EN11 and did not identify any changes that would result in the need to update this policy. The Council recognises the importance of protecting and further developing a strong Green Network and therefore, EN12: Biodiversity is proposed to be significantly strengthened. A new policy EN19: Urban Greening Factor seeks to increase soft surface and green landscaping on sites.</p> <p>In relation to the Green Infrastructure Framework Principles and Standards:</p> <ol style="list-style-type: none"> 1) The Council does not currently have the resources to progress a Green Infrastructure Strategy and Delivery Plan. The Council already has strategies in place that cover elements of this, including the Climate Emergency Strategy, Tree Strategy and Biodiversity Action Plan. 2) The individual standards mentioned are dealt with in turn below. Everyone has access to good quality greenspace close to home with a focus on access to greenspace within 15 minutes walk - The Public Open Space and Local Green Space designations in the existing adopted Local Plan would generally be a good proxy for good quality greenspace, almost all of which is publicly accessible. Using an average walking speed of 3 mph, a 15 minute walk equates to about 1,200 metres. When a 1,200m radius is applied to the designated Public Open Space and Local Green, the only part of the entire Borough that is outside that radius is a small corner of Green Park that covers less than 20 ha and where the only buildings are offices, with no plans for residential use. Therefore, as long as the current designations are carried forward in the Update with only minor amendments, Reading complies with this standard and no further action is necessary. <p>Local authorities have at least 3ha per 1000 population of publicly accessible quality</p>

			<p><i>greenspace</i> - Reading's 2021 Census population is 174,244, which would mean that 523 ha of publicly accessible quality greenspace is needed to accord with this metric. Following the Open Spaces Strategy in 2007, the Council has maintained mapping of accessible open space including an annual update with gains and losses. This layer shows that there is 428 ha of publicly accessible open space in Reading Borough at 2024. This does not include any assessment of the quality and/or greenness of this space. This shows that Reading falls 100 ha short of this standard.</p> <p>This clearly underlines the need for the Local Plan to secure additional open space where it can, as policy EN8 and others already do. However, the specific standard is not likely to be capable of being met in Reading without large scale introduction of unrestricted public access to agricultural land, which is not likely to be deliverable by the Local Plan. Therefore, whilst the policies should continue to increase publicly accessible open space wherever possible, adoption of this specific standard does not make sense in Reading.</p> <p>Set standards for provision on major developments - Policy EN9 sets these standards.</p> <p>3) There are unlikely to be significant opportunities for additional Local Nature Reserves and Local Wildlife Sites in Reading given the nature of the Borough. Policy EN12 already makes reference to enhancement of the Green Network including LNRs and LWSs. Nature recovery will be considered further in the Local Nature Recovery Strategy being produced by the Berkshire authorities, and policy EN12 can be amended to highlight the areas identified in the LNRS as opportunities for the greatest contribution to nature recovery. Policies such as EN12 and EN14 would also already have the effect of contributing to nature recovery, particularly when the planned updates are factored in.</p>
--	--	--	--

			<p>4) The Urban Greening Factor is being considered further, see answer to question 17</p> <p>5) The Council has dealt with the issue of tree canopy cover in its Tree Strategy (adopted 2021), which seeks 25% canopy cover across Reading by 2030 and for no ward to be lower than 12%. The key elements of the Tree Strategy relevant to development decisions are proposed to be factored into an amended policy EN14. It is not considered that a specific requirement for canopy cover on individual sites should be introduced. There is a wide variety of development sites in Reading, many of which are in the town centre, to be developed at a high density and often on a very small footprint. It is right that the plan should secure additional tree planting wherever possible on all types of site, as is currently the case in EN14, but it is not considered that a specific percentage cover figure for each site is an appropriate response in Reading.</p>
FCCG	No answer	<p>Much more protection should be afforded to views with heritage interest under EN1 and EN5. EN3 on enhancement of Conservation Areas is in need of updating. EN9 on provision of open spaces needs updating in the light of the increase in population in the town centre in particular EN11 on waterspaces should be reviewed: The river banks should be spaces for leisure and enjoyment and need to be accessible to all of the town's residents. Residential and other building should not overshadow the waterspace or the banks.</p>	<p>The Local Plan Review carried out in March 2023 reviewed EN1, EN3, EN9 and EN11 and did not identify any changes that would result in the need to update this policy.</p> <p>It is unclear what specific changes should be made to EN1 and EN3 as the Council considers this to be up-to-date. This decision has been informed by discussions with Historic England.</p> <p>It is considered that the requirements of EN9 attempt to strike a balance between delivery the number of homes needed and providing open space for residents, while ensuring that development is viable.</p> <p>The existing policy EN11 already requires development to be set back by ten metres from the watercourse and should make positive contributions to the amenity of the watercourse which is considered to broadly cover the issue of overshadowing. Additionally, limiting residential development along the Thames would seriously impact housing delivery. Each site is assessed on a case-by-case basis and impacts to the</p>

			watercourse considered carefully. Therefore, it is not considered necessary to reopen this policy.
Sport England	Y	In principle this seems logical	Answer is noted. No changes required.
CAAC	Other	<p>Partially agree but we would like to see the policies EN1, EN3, EN4 and EN5 and explanatory wording updated as below:</p> <p>The explanatory paragraphs attached to each policy are, in some cases out of date as are some of the links. Below we highlight some that we noticed are in need of update in case this is helpful but this is not an exhaustive list.</p> <ul style="list-style-type: none"> EN1 4.2.14. This paragraph mixes the use of Article 4 directions to protect heritage and those that require planning permission for other developments e.g. HMOs. This should be clarified. EN1 4.2.14. It is not correct that there are 15 Article 4 directions in place to protect patterned brickwork as some protect other architectural features, as now explained on the planning website. (https://www.reading.gov.uk/planning-and-building-control/article-4-directions/) The practical application of Reading's Article 4s is not clear and transparent and the wording of this paragraph does not help. EN1 4.2.15. The list of heritage assets at risk is out of date. EN3 4.2.18. The links for the list of conservation area appraisals and guidance to property owners are out of date. EN3 4.2.19. This is paragraph about the work of Reading CAAC and we are content with it. The link to the Reading Civic Society is out of date and Reading CAAC now has its own website readingcaac.org. EN4 4.2.20. For the avoidance of confusion, this paragraph should explain that buildings or features in a CA cannot be added to the local list. The link to Historic England guidance on local listing is consequently misleading as it permits this. EN5 4.2.22 As the document describing the views has now been added to the council's planning pages a link to the document should be included. 	<p>Answer is noted, changes agreed.</p> <p>Paragraph 4.2.14 has been updated refer to Article 4 directions that relate specifically to heritage only. Clarity has been added on the protection of patterned brickwork, as well as other architectural features etc.</p> <p>Paragraph 4.2.15 has been amended to update the list of heritage assets at risk.</p> <p>A footnote linking to Paragraph 4.2.18 has been updated to provide the correct link for conservation area appraisals and guidance.</p> <p>A footnote linking to Paragraph 4.2.19 has been updated with the correct links to the websites for Reading's CAAC and Civic Society.</p> <p>Paragraph 4.2.20 Amendment to clarify that local heritage assets are not protected from loss in the same way as conservation area designations. However, the full criteria for inclusion of locally listed assets (which includes this nuance) is set out in Appendix 2 so it is not deemed necessary to expand on this further within the supporting text.</p> <p>Paragraph 4.2.22 has been updated with a link to the document describing the views.</p>
Reading Friends of the Earth	No answer	<p>EN15 Air Quality should be improved to emphasise importance of PM2.5, to refer to WHO standards, Reading AQAP, and emphasise impact on creation of particulates by wood burning stoves and powered vehicles. Preventing net increase in emissions is not enough.</p> <p>EN16 should be improved to: address risks of sewage outflow to rivers and watercourses; use of grey water harvesting or rainwater harvesting to add resilience and reduce demand.</p>	<p>Agreed. No change proposed. The Local Plan Review carried out in March 2023 reviewed EN15 and did not identify any changes that would result in the need to update this policy as it already refers to the importance of reducing PM2.5 and the harm caused by wood burning stoves and vehicles.</p> <p>Minor change proposed to refer to the AQAP.</p> <p>Changes proposed to EN18: Flooding and Sustainable Drainage Systems to address the risks of sewerage to watercourses.</p>

			Change proposed to refer to grey water and rainwater harvesting in policy H5: Standards for New Housing.
Historic England	Y	Yes, we broadly support the proposed changes	Answer is noted. No changes required.
Savills OBO Viridis	Y	We agree that the policies identified should be updated, in order that the LPPU responds to the increasing levels of development needs, is consistent with the NPPF and to ensure alignment with all aspects of the Local Plan Vision and Objectives (e.g. relating to climate change, zero carbon etc).	Answer is noted. No changes required.
Savills (OBO Sorbon Estates Ltd)	Other	Yes, the policies identified should be updated. However, policies EN1 (Protection and Enhancement of the Historic Environment); EN2 (Areas of Archaeological Significance); EN9 (Provision of Open Space); EN15 (Air Quality); and EN16 (Pollution and Water Resources) should also all be reviewed and updated where necessary. Any updates should have regard to the most up-to-date guidance and evidence and proposed updates to the plans' Vision and Objectives, in the context of the Climate Emergency, and move to a net zero carbon Reading by 2030. This is to ensure consistency with the NPPF and to ensure that the LPPU is sound in line with Paragraph 35 of the NPPF.	<p>The Local Plan Review carried out in March 2023 reviewed EN1 and EN2 and did not identify any changes that would result in the need to update this policy. This decision has been informed by discussions with Historic England.</p> <p>EN15 and EN16 are also considered to be up-to-date. There are significant changes proposed to EN18: Flooding and Sustainable Drainage Systems that should address these concerns with regard to watercourses. No changes have occurred with regard to national or local policy that would render EN15 out-of-date.</p> <p>Changes are proposed throughout the plan to emphasise the shift to a net zero Reading by 2030 and to refer to the urgency of Climate Emergency.</p>
Swifts Local Network: Swifts & Planning Group	Y	<p>I support the inclusion of the natural environment in the Local Plan. In summary, the current proposals are positive with regards to green habitats but do not consider endangered urban wildlife such as red-listed bird species which inhabit buildings in Reading.</p> <p>The Reading Biodiversity Action Plan does mention swift bricks but only in a general sense without any guidance on numbers and locations.</p> <p>Therefore please add to the Local Plan: Swift bricks to be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021:2022 or CIEEM which require at least one swift brick per home on average for each development.</p> <p>In more detail, the reason for this is that bird boxes/ bricks and other species features are excluded from the Biodiversity Net Gain metric, so require their own policy. See Government's response in March 2023 to the 2022 BNG consultation (page 27)</p> <p>Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023).</p>	<p>Answer is noted. Change partially agreed. Policy EN12 will be amended to set out that wildlife friendly design must be incorporated within new developments, including, for example, the provision of bird nesting and bat roosting opportunities within new buildings (such as universal swift bricks and bat bricks or tiles).</p> <p>Where applicable, conditions can be added to a decision notice that requires the provision of ecological enhancements such as swift bricks to address this matter.</p>

		<p>Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42:</p> <p>Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind. Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM).</p> <p>Many other Local Authorities are including detailed swift brick requirements in their Local Plan, such as Tower Hamlets Local Plan Regulation 18 and Wiltshire Local Plan Regulation 19 stage, which both require an enhanced number of 2 swift bricks per dwelling. so this enhanced level should also be considered.</p> <p>Also, please add: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Reading return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.</p>	
Graham Bates	Other	Please see 11 above.	See officer response to Q. 11.

Additional representations submitted via email regarding updates Built and Natural Environment Policies

Respondent name	Comments	RBC Officer Response
Savills (OBO Beechcroft Developments Ltd)	<p>The following RBLP Policies are also relevant to informing development proposals at the Site [Caversham Park, CA2]. These policies have not been identified for review and we would agree that there has been no substantial change in either national policy or local evidence to justify review of these policies:</p> <p>EN1: Protection And Enhancement Of The Historic Environment EN6: New Development In A Historic Context EN8: Undesignated Open Space</p> <p>Policy EN1 follows closely the guidance set out in the NPPF. Whilst Beechcroft would agree that EN1 does not require review, as it closely follows the most up to date National Guidance, it is considered that Policy EN1 provides the starting point in which to review Policy CA2.</p>	Answer is noted, no changes required.

Q. 13 Do you agree that we should update policy EN4 as described? Are there other changes that are required? - Please explain answer

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	All pristine green space & all recreational green space left within the borough should be protected & preserved. Development should be restricted to brown field.	See officer response to Q. 12.
Adam Boulding	Other	i would actually loosen your polices here. there are much fewer buildings and assets needing protection and in fact it should reflect that changes can be to help protect the asset, for example repairing roofs, water proofing, windows upgrades for environmental benefit, where as strict rules on protection of the "heritage" often makes these options financially unviable and harder.	Do not agree. RBC have a number of locally listed buildings to consider. The LPPU does not preclude such repairs where they comply with relevant policy criteria. The protection and conservation of heritage assets is enshrined in national policy and must be retained. Therefore no changes are proposed.

Mark Treder	Other	As above	See officer response to Q. 12.
Paul Oliver James Melville	Other	as above	See officer response to Q. 12.
Anthony Acka'a	Y	It's logical	Answer is noted. No changes needed.
CADRA	No Answer	CADRA notes the need to ensure this is consistent with NPPF para 201. The wording should also reflect advice from Historic England who advise that: <i>Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment.</i> CAAC should have the opportunity to comment on the proposed wording.	Agree. Change proposed. The wording of the supported text should be amended in line with the suggestion.
FCCG	No answer	EN4 needs updating to ensure protection of locally listed assets	Agree. Policy EN4 is being updated as a part of this Partial Review.
CAAC	Y	We have read para 201 of the NPPF, which deals with <i>all heritage assets</i> (including locally listed assets) and states, that the significance of a heritage asset should be assessed and '...taking this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict, between the heritage asset's conservation and any aspect of the proposal.' The strength of local listing is that it gives strong weighting to the local significance of an asset. Historic England states that the '...lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment.' Local lists can also be a way of ensuring that the importance of a building is considered that might not meet the current the current criteria of Historic England, particularly modern buildings. The Twentieth Century Society comments that local listing can serve as a 'waiting list' to identify buildings that cannot currently be nationally listed but whose national significance may come to be realised. We agree the second bulleted change replacing 'the Council' by 'decision maker' We agree the third bulleted change – see our comments above under Q12 above	Answer is noted. No changes needed.
Historic England	Other	While we broadly support the changes proposed, care is needed in the language on "buildings of townscape merit" in a conservation area. Though a conservation area is a designated heritage asset, buildings within it identified as non-designated heritage assets (in this case, buildings of townscape merit) are not nationally designated.	Agreed. Proposed supporting text has been adjusted to make clear that buildings of townscape merit are not nationally designated.
Stantec (OBO UoR)	Y	The University agrees that the wording of this policy should be updated to be consistent with national policy regarding non-designated heritage assets to ensure that it is clear and robust.	Answer is noted. No changes needed.
Stantec (OBO Aviva Life & Pensions Ltd)	Y	The proposed amendments to Policy EN4 relating to locally listed heritage assets, and other policies where the amendments are proposed to ensure consistency with the NPPF, are also supported.	Answer is noted. No changes needed.
Graham Bates	Other	See above	See officer response to Q. 11.

Additional representations submitted via email regarding policy EN4/heritage in general

Respondent name	Comments	RBC Officer Response
Berkshire Gardens Trust	We agree with the proposed changes in wording to EN.4 but the wording should be further amended to cover locally important heritage parks and gardens as well as buildings and structures. These are equally important to the town and need to be properly recognised and protected from damaging development or change. We urge the Council to create a list of locally important historic parks and gardens. We would be very pleased to assist in this.	No change proposed. The Council has already established a List of Locally Important Buildings (including structures). It is not clear what additional recognition or protection would be afforded to any sites on a new local list for historic parks and gardens that

		is not already achieved through a Local Green Space designation.
Berkshire Gardens Trust	In conclusion, we see that enormous benefit would arise from drawing up a list of locally important historic parks and gardens. These make a significant contribution to not only the history of the town, but also to the fabric and character of the town, and to the provision of accessible green spaces and private open planted areas which contribute to the health and well-being of the Reading community. Such a list would help achieve the protection of many locally important heritage assets (appropriate to their status) with their many benefits to the town. We would welcome the opportunity to collaborate on creating such as list by undertaking research into potential sites.	See officer response above.

Q. 14 Do you agree with the proposed amendments to the boundaries of the existing Local Green Spaces and Public Open Spaces? (This question relates to policy EN7)

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	All pristine green space & all recreational green space left within the borough should be protected & preserved. Development should be restricted to brown field.	See officer response to Q. 12.
Mark Treder	Other	As above	See officer response to Q. 12.
Paul Oliver James Melville	N	Reading as a large conurbation cannot be in an OANB area. Central governments will decide Green areas for extension.	Do not agree. No updates proposed. There is currently a process underway led by Natural England to review the boundary for the Chilterns AONB as set out under policy EN13. The decision to extend the boundary will be made by Natural England.
David Pierce	Other	Not reviewed	No change needed. Information on policy EN7 can be found in Chapter 6 of the LPPU Scope and Content document.
Anthony Acka'a	Y	It makes sense to do this with all things considered.	Answer is noted. No changes required.
Natural England	Y	Yes update to make current.	Answer is noted. No changes needed.
Louise Acreman	N	Any green space taken from the community should be replaced with equal green space. MPF - the green space taken by the school should be replaced with equal green space. I can't see any evidence of that. Rivermead- again, the green space taken by the school should be replaced with equal green space. You are proposing replacing green space taken by the school with green space where the temporary pool is. The temporary pool was built on green space so this area should be returned to green space, but is not a replacement of green space taken by the school. Building on green spaces and not replacing those green spaces is completely against your proposed framework and sets a very poor precedent for the future.,	Do not agree, no changes proposed. The principle of the loss of green space was assessed at the respective planning application stages and is therefore not a consideration at this point.
Sport England	Y	In principle this seems logical	Answer is noted. No changes required.
M Langshaw	Other	Yes, but more effort should be put in to retain/create additional LGS. It is noticeable that in the 3 sites that have lost green space, often the substituted space is described as public space rather than LGS.	Do not agree, no changes proposed. The sites' boundaries will be revised, but their status as an LGS will not change. The loss of the LGS areas was assessed at the planning application stage and this policy merely seeks to revise the boundaries to reflect this change.

Additional representations submitted via email regarding the boundaries of Local Green Spaces and Public Open Spaces

Respondent name	Comments	RBC Officer Response
Berkshire Gardens Trust	We support the proposed changes to the boundary of Palmer Park and would like this to be considered for inclusion in a list of locally important historic parks and gardens.	No changes proposed. RBC does not currently have a list of Locally Important Historic Parks and Gardens which Palmer Park can be added to. Nominations for Locally Listed Buildings is a separate process outside of planning and can be found on our website.

Q. 15 Do you consider that Land at Kentwood Hill (WR3s) and Land at Armour Hill (WR3t) would qualify as Local Green Space? (This question relates to policy EN7)

Respondent name	Y/N/ Other	Comments	RBC Officer Response
James Ford	Y	All pristine green space & all recreational green space left within the borough should be protected & preserved. Development should be restricted to brown field.	See officer response to Q. 12.
Mark Treder	Other	As above	See officer response to Q. 12.
Katie Jenks	Y	The land has broad-leaved woodland as well as scrub vital for wildlife. It is the only area in Tilehurst free and protected from dog walkers and has a large badger sett as well as a number of bat species using the habitat. It acts as a protective corridor between Arthur Newbery and Mclroy for species such as badger, muntjac, fox, hedgehog, etc, all of which either have breeding confirmed here (through video cameras) or breeding probable	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Luke Dickens	Y	These sections of land provide vital habitat for local natural wildlife in an otherwise largely urban area of Reading. I believe this important green space is also crucial for mitigating the effects of pollution locally and improving air quality in Tilehurst	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Jessica Irwin	Y	It is an area of diverse wildlife in the middle of Tilehurst. It should be protected as such. There are precious few green areas in and around Reading and so it is really important to retain this land to provide a safe and peaceful environment for the animals and birds that live there. It is also so important for the people of Tilehurst to have green spaces to visit and walk in.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very

			little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Heather Harrison Lawrence	Y	This is an area which is valuable to the local community as a green space.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Gillian Andrews	Y	This Local Green Space is demonstrably special to our local community and holds particular local significance as an area of natural beauty, historic significance, recreational value as a working allotment, tranquillity, and a richness of protected wildlife. There are established badgers sets here (under protection across the UK), plus a plethora of birdlife - also under threat. This area holds a great deal of importance as a local green space. The local GP surgeries and schools agree, there is no more availability to accommodate an expanding population in this region, and would be a considerable strain on the local infrastructure. Essentially, this area is more valuable remaining as a Local Green Space, continuing to enhance the well-being of all who share it.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Louise Corderoy	Y	This is a special area of inaccessible green space thereby being of huge value to wildlife and for environmental concerns. Without it biodiversity would be much less, contributing further to the abhorrent lack of biodiversity in the UK. It provides a wide variety of native trees, impossible to replace elsewhere in the borough due to the nature of the urban housing. Contributing to clean air and helping against climate change such areas are vital and must be protected. It also acts to break up the relentless urban sprawl and gives this area it's slightly less urban characteristic.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Debbie Sadler	Y	I believe that these pieces of land should qualify as Local Green Space. They are very close to the local community, are of particular local significance in terms of recreation, wildlife and massively enhance the tranquillity of the area (which is already too busy) and have a rich variety of flora, fauna and wildlife. Developing these pieces of land would place significant additional burden on the local amenities - it is already impossible to get a doctors appointment, the schools are all full. The bin collection days are already unreliable for green waste and the air pollution is extremely bad without the addition of a significantly greater number of cars, vans, etc polluting the environment. Destroying these green spaces would be fundamentally contrary to the purposes of the plan as is not requirement in order for RBC to meet its other objectives. These green spaces are important to my and my family as they allow us to enjoy nature and escape from the many demands of everyday life. It is my firm belief that these areas of land do and should qualify as Local Green Space.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Andrew Thompson	Y	There is very little land in Tilehurst for nature and wildlife to thrive. Since the trustees of these two parcels of land cordoned them off, foxes, deer, badgers and many smaller animals have thrived. The trustees should be applauded for this. I know that we have a severe shortage of housing, but	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at

		<p>we also live in a country whose nature has been severely denuded. To designate either, or both of these areas as LGS would help redress this decline. Not to do so would be a regressive step.</p> <p>No planning decision will satisfy all the demands on the land in question, but I would like the officers to give priority to what both the King and Archbishop of Canterbury have spoken and written about building communities and not just housing.</p>	<p>Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
Dave Newnham	Y	<p>[We] think that this indeed qualifies as green space.</p> <p>It has a diverse range of wildlife living which is observed daily and on wildlife cameras.</p> <p>This includes Deer, Badgers, Foxes, Owls, Stag beetles, Insects, Butterflies and much more. It is important to have these green spaces not only for the wildlife corridor that it is but also to aid with the education and well being of the local community. Local children come to the allotments to learn about growing plants and vegetables and people also come just to sit and relax.</p> <p>Not protecting this space is a mistake, The habitat would be destroyed and wildlife uprooted, forced to relocate or perish.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
Tanya Talbot-Butler	Y	<p>It is a lovely, tranquil area and with the local community feels more like a country village than a bustling town. While I have only lived here for a few years, I have already seen deer, badgers, foxes and the nesting kites who soar above and feed in the area. It is a haven to these animals and the more shy species we may not see on a daily basis but which add to the habitat.</p> <p>The area in question is also a link to other wildlife habitats. What happens to them if we lose this space? With the additional concern of climate change, should we not also be thinking long term about our green space?</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
Maisey Booth	Y	<p>We have seen hedgehogs, numerous birds, insects, butterflies and bees. Not only does this area show a richness of wildlife but also provides a safe, tranquil and beautiful place for our family to walk through, avoiding roads and pollution. We would be devastated to see this area build on, as its makes our walks more pleasurable and no doubt aids to keep a whole families mental health well cared for. All of the above is why we hope Reading Borough Council put the needs of families and wildlife already living in the area at the forefront of their decision making.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
George Albert Solly	Y	<p>This is a vital wildlife corridor for nearby Arthur Newbery Park and Mclroy Park and should be listed as a Local Wildlife Site in the new plan.</p> <p>Bio diversity is an important part of national and local planning and much of the area in question is rich in wildlife and hasn't been touched for decades. No other area locally can claim that, so by destroying it with new housing is a step too far which cannot be reversed.</p> <p>The proposed development by the landowning charity TPLC states that the income received from the sale would benefit local people allowing it to cover small claims for assistance. Once this money has been exhausted however, the local benefit ceases. If the land is kept / re designated as a Local Green Space then it benefits the local community in perpetuity.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate. Local Wildlife</p>

			Sites are designated outside the Local Plan process.
Kathryn Solly	Y	<p>These areas of land are part of a crucial wildlife corridor from Arthur Newbery Park and associated gardens across the allotments and identified areas to Mclroy Park which it turn joins up to Lousehill Copse. The ecological sustainability of this biodiverse area links to Reading's own policies on environmental protection.</p> <p>We have witnessed much of this wildlife including badgers, foxes, deer, bats, small mammals and numerous birds. It would be criminal in the present climate emergency to remove it for housing.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
David Pierce	Y	<p>Yes I do. The land in question forms an important green space between old Tilehurst and the area towards Kentwood Hill / Oxford Road. The scouts lost a significant part of their scavenging and roaming area when Wheeler Court was developed and I know they still consider the area WR3t a useful space - formally or not. WR3s has for too long been blocked off with an ugly depot of seemingly little use other than as a speculative land-grab. It would be great to establish a Kentwood Hill to Armour Hill green walking route as it seems mad that a person of limited mobility has to go up Lower Armour and then Armour Road (the pavements are compromised by car ramps and now CityFibre boxes in the middle of the path. Or worse - down Armour Hill to the Scout hut the UP Kentwood to get to the same place. It could be a very nice space.</p>	. Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Sally Cooke	Y	<p>Very much so. The numerous wildlife (badgers, foxes, deer, etc.) - we need to look after these and i understand they are protected already. The trees are protected also. Allotments have specialised sites for handicapped (raised flower beds) and schools. It is imperative that this is protected for the future education of our children and the environment and healthier air. Tilehurst is an extremely busy area and to build on this ground would not be in the interests of the wider community who use these facilities or also in relation to climate change.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Jane Scott	Y	<p>Because it is green space that is vital to the community. There is too much danger of loss to wildlife if the building proposals go ahead and environmental value in Tilehurst is disregarded. There is a chance to help to stall the loss to wildlife and our ecosystem please don't waste it. Our green spaces are our breathing spaces for all who live and work and go to school in the area.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Tilehurst Allotment Society	Y	<p>The land surrounding the allotment site should qualify as a 'Local Green Space ' because :</p> <p>It is a habitat for protected species: badgers ,kites,owls,slow worms and bats.</p> <p>It provides a delightful backdrop to the allotments eg trees, bushes & wildlife especially birds.</p> <p>It insulates the site from noisy traffic and air pollution on Kentwood Hill.</p> <p>The land could encroach on the allotment car park and a few plots could be lost, if development went ahead.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance

		It is a small area with houses close by. Occupants would suffer the loss of a natural view that will likely be replaced by houses. Historically ,the allotment surrounds have been the 'green lungs ' of the area since records began. Finally, any change to the edge of the allotment site would diminish the charm of this place .Tilehurst allotments provide a lovely, calm sanctuary to the area which is so much needed in a noisy , ' hustle and bustle' world.	for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Fiona Sutherland	Y	It's a much needed wildlife haven - small wild deer use this location	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Dave Wraight	Y	I consider that this space adds value to the local area - it is a wildlife habitat and a place of quiet - it was very obvious during the COVID lockdowns the value of such spaces.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Lucy Bellman	Y	Natural habitat for wildlife Slow worms Badgers Bats Hedgehogs Should remain as a green breathing space	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Bernard Patrick Fyans	Y	This land adjacent to the allotments has provided a habitat for wildlife for many years and contributes to the biodiversity of the local environment. To develop these areas would eliminate this facet as the wildlife would not migrate to the allotment area but leave completely in view of human pressures. The amount of local traffic has already increased in the area and would become greater with housing development. This would detract further from natural environmental benefit. The site is right next to the people who will benefit from it becoming a Local Green Space. By development standards the land referenced WR3s and WR3t are quite small and therefore not an extensive tract of land.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Anthony Acka'a	N	I believe this should be kept as development allocation as the areas identified aren't particularly special, nor are they very accessible by local residents. I believe instead it would be better if the	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of

		pavement is widened perhaps including an segregated bicycle lane and also use the space to provide the 'family-sized' housing which is needed in Reading.	greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. However, those areas of lesser value would continue to be allocated.
Carolyn Ribbons	Y	It should be designated as Local Green Space as it is enjoyed by many at present, not least the allotment holders in Armour Hill. Any development would be seriously detrimental to the area, as traffic and parking in Armour Hill at present is bad. It would also endanger wildlife in the area	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
J & G Hiscock	Y	These areas are vital to remain for the community. They are both places that offer peace and tranquillity to many people from the stresses of daily life. They are safe spaces to enjoy the beauty of the surroundings the richness of flora and fauna and fresh air throughout all seasons of the year. We cannot afford to lose such areas as once lost they can never be reclaimed for generations to continue to enjoy.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Natural England	Y	We are supportive of the designation of new Local Green Space to afford this greater protection and recognise their important roles for health, wildlife and environmental benefits. A current and robust Green and Blue Infrastructure Strategy would help inform the decision.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
CPRE Berkshire	Y	CPRE Berkshire strongly supports the designation of these two adjoining pieces of land as Local Green Space in view of the wider site's importance to the borough in terms of biodiversity and climate change mitigation, its proximity to the local community, its richness in wildlife, and its distinctive local character. In an urban area such as Reading, it is, in our submission, all the more important that green spaces are protected from development sprawl, for the sake of the health and wellbeing of the local community and the protection of local wildlife. We therefore urge the Council to remove this land from any development allocations in the Plan Update and recognise the entire site (including allotments and recreation ground) as one cohesive area of Local Green Space, as has been previously proposed. We also support the comments made by BBOWT on this matter, especially with regard to the badger setts that have been identified on-site.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.

<p>Jenny Cottee</p>	<p>Y</p>	<p>Yes I think both WR3s and WR3t are well qualified to be designated as Local Green Space Regarding the nature of the sites, the landlord 'decanted' plot-holders from these sites in 1997. Since then, the flora and fauna have been undisturbed, making these sites unique in urban Reading even though located in the well-wooded Tilehurst area. All other Local Green Spaces are cultivated to some degree. Even with no public access the extensive wildlife is noted, valued by the local community and a source of delight to many including myself.</p> <p>I understand it is a very significant step to remove two sites from the list of development allocations, but I believe this is warranted by the pattern of relaxed management that has undermined the effectiveness of planning regulations and decisions. The pressing need for family housing does not override the need to establish local discipline and compliance. It is timely to make such a decision. Once development has occurred opportunities will have gone forever. I trust there will be changes in behaviour of landowners, and improved observance of planning requirements in the life of this Local Plan.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
<p>KKG</p>	<p>Y</p>	<p>Yes, we unequivocally do and will break down below how the sites WR3s and WR3t meet the criteria.</p> <p>The community served by these two sites (as well as the adjoining, already categorised LGS, sites of the Victoria Recreation Ground and the allotments) are comprised of many groups of people. These are local residents, allotment plot holders, dog walkers, schoolchildren and people who regularly walk past the sites on way to work, school, local shops and Arthur Newbery Park (also an LGS).</p> <p>The site is surrounded by mature housing (some dating back to 1835) and both Armour Hill and Kentwood Hill have a significant number of passers-by, all of whom enjoy the amenity value of the significant wooded areas. This was recognised by Sarah Hanson (Reading Borough Council (RBC) Natural Environment Officer) as stated in her report to Planning Applications Committee on 22 June 2022 in response to the objection to the Area Tree Preservation Order (TPO) served in March 2022. <i>"When viewed by the passing public on Armour Hill and Kentwood Hill, the land has an overall green, treed appearance providing amenity value to the street scene"</i>. Also, that <i>"the site will be viewable and provide amenity value to those residents living adjacent to the land"</i>.</p> <p>As well as raising public awareness of the sale of the land, KKG has been proactively surveying the sites to officially record the wildlife living there. Wildlife cameras have been set up on the edge of sites WR3s and WR3t, as requests to TPLC for access to undertake surveys have been repeatedly denied. We have also undertaken bat, bird and moth watching activities. All recordings have been logged with TVERC with their associated video, photographic or sound evidence and geolocation data. Well over 100 different species have been seen or heard in or above WR3s and WR3t and the Builders Yard. This data was used in the successful bid to get the whole area listed as a Local Wildlife Site ¹. Given TPLC have refused both KKG and TVERC access to the land for independent surveys, it would be safe to assume that this recorded species listing is only a small subset of the actual biodiversity that exists there (in particular of flora, as the focus has been predominantly on vertebrates).</p> <p>22 of the protected species/ species of special concern listed in RBC's Biodiversity Action Plan have been officially recorded with TVERC as existing on the land, including badgers, hedgehogs, slow worms, stag beetles, 6 species of bats, owls, and kites. A verified, large and mature, main badger sett is situated here, with satellite setts and foraging pathways found throughout all the land surrounding the allotments and Victoria Rec. Throughout WR3s, WR3t, the Withies and even within</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife including the badger setts.</p> <p>In terms of the NPPF criteria, it is considered that the land meets criteria (a) in terms of being in proximity to the community it serves and (c) in terms of being local in character and not an extensive tract of land. It is agreed that the additional land to be included within the LGS designation qualifies in terms of the richness of its wildlife, in particular with the clear evidence of presence of badger setts. The evidence of the richness of other parts of the land is not clear to us at this point, although it is noted that wildlife is likely to range beyond the protected land to some degree.</p> <p>It is also noted that the undeveloped land contributes to the tranquility of the area, although it is considered that the area around the builders yard and the allotment access and car parking makes a lesser contribution to this and therefore only part of the area qualifies.</p>

	<p>the Builders Yard, bats roost, birds nest and other animals live and forage. Without WR3s and WR3t left as wild, green space, the biodiversity enjoyed by so many would disappear. The allotments are used for foraging, not setts or nesting. While of undoubted recreational value, Victoria Rec is a biodiversity desert other than the trees, which connect with those on WR3s and WR3t. The recognised protected Areas of Biodiversity Interest of the Withies, Mcllroy Park, land at the end of Armour Hill and Arthur Newbery Park – which comprise an interconnected wildlife corridor - would be hugely impacted by allowing houses to be built on WR3s and WR3t, even with the noted planning restrictions of leaving some minimal form of wildlife corridors. The unique characteristic of these 2 sites is that they are not publicly accessible so the wildlife can live and breed in areas undisturbed by people and their dogs and move to and from their homes to surrounding green space for foraging and hunting at night. If these sites are not also given the same level of protection, then the biodiversity in the area will disappear. Habitats are arguably more important for wildlife than corridors.</p> <p>KKG has the support of Binfield Badgers (affiliated to the Badgers Trust), CPRE Berkshire and BBOWT and they have all said they would formally respond to this Partial Update of RBC's Local Plan supporting our bid to recognise WR3s and WR3t as Local Green Space. The richness of the wildlife throughout WR3s and WR3t has been evidenced and many individual locals (including all KKG members) will attest to this being the main reason for its significance.</p> <p>Another recognised characteristic of Local Green Space that is true of WR3s and WR3t is their vital contribution to the tranquillity of the area. The trees act as a buffer against noise, heat, and light pollution that anyone using the allotments (either as a plot holder or other members of the local community walking through) can enjoy. The land, its numerous trees, flora, and fauna afford a real appreciation of nature and a sense of countryside in the town – rare and precious features in an otherwise highly built-up area. Local residents and allotment plot holders value its multiple benefits for well-being and health - contact with wildlife in town, a pleasant view, dark skies at night to view the stars, fresh air, in addition to the afore-mentioned buffer - on a daily basis.</p> <p>Sites WR3s and WR3t have always been green space and have never been developed. Even the Builders Yard is mostly open-air storage of scaffolding with a few non-permanent buildings (no planning permission sought or granted) and some hard-standing. The Builders Yard is still inhabited by the wildlife - used by bats for roosting and the derelict remains of outbuildings used as shelters by foxes, deer, and birds so the process of rewilding is happening here too.</p> <p>The two sites, even when counted together, are not extensive – WR3s is 1.43 ha with WR3t being smaller at 0.45 ha. This is significantly less than the RBC upper limit placed at 50 ha when deciding on Local Green Space being “not extensive”.</p> <p>The first exercise to classify LGS within Reading borough was carried out in 2018 and the approach and results are detailed in the 2018 document “Local Green Space and Public Open Space Background Paper”. RBC gave LGS status to the Victoria Road Recreation Ground and Kentwood Hill Allotments (Local Plan ref EN7Wu) as it “is one of the most valued green spaces in the west of Reading and provides sports pitches and allotments, as well as habitat for wildlife”. WR3s and WR3t were not mentioned in this document although without WR3s and WR3t there would be no habitat for wildlife since the species identified do not live on the allotments or the Victoria Rec. Reading the paper, WR3s and WR3t must have been excluded as they were provisionally “already allocated for housing” as part of the Call for Sites exercises in 2014 and 2017. The only other</p>	
--	--	--

		<p>criterion that is true of these sites compared to the ones that did get included is that they are not accessible by the public. Public access is obviously a valid criterion for the tandem Public Open Space policy, but it is not a criterion for including or excluding land as LGS.</p> <p>In 2018, the Local Plan had not been formally adopted so the land was only <i>proposed</i> as suitable for residential development, rather than <i>proven</i> to be suitable. There have not been any planning permissions sought on the land since 2002 (The process was started by Wimpy homes but was withdrawn shortly before the Planning Applications Committee meeting) nor has the land yet been sold to a developer.</p> <p>The evidence submitted to state that WR3s and WR3t were suitable for residential development and were of no significance from a wildlife or biodiversity perspective was based purely on a desk-based survey undertaken in 2017 by a company employed by TPLC who wanted (and still want) to sell the land to any bidder. This is manifestly in contrast to the reality of our evidence gathered and reported to TVERC as above. They also failed to acknowledge the many veteran trees included within WR3s and downplayed the role of scrubland, hedgerow and a huge mix of trees from both a species and age perspective from being a valuable recognised habitat to being of no value. In any case, this survey is now many years out of date: in the interim, both flora and fauna populations have grown significantly.</p> <p>Also of note is that, prior to the Call for Sites in 2014 and 2017 at a time when the Housing Crisis was the main driving force behind planning, all of TPLC's land was protected as "Public and Strategic Open Space", summarised as "<i>Important areas as shown on the proposals map will be protected from development. Proposals that would result in the loss of any of these areas of open space or jeopardise their use or enjoyment by the public will not be permitted.</i>" The enjoyment by the public has not diminished; RBC have since recognised the Climate Crisis; the wildlife and flora have flourished; and housing targets have been met.</p> <p>If LGS protection is given and TPLC allow us, KKG would seek funding via schemes such as the Community Ownership Fund, the Community Infrastructure Levy and the biodiversity net gain funding (as obtained and being utilised by BioCap Limited at the nearby Sulham Estate) to enhance all areas in terms of their biodiversity and beauty and hope to work with the tenants of the Builders Yard to help achieve this. All or parts of the Builders Yard could be repurposed to host educational and other community activity and/ or proactively rewilded once the current tenancy period has expired if TPLC seek to utilise the land in a more profitable and environmentally friendly manner. We would work to move the LWS to the standards defined as being in "positive conservation management" by DEFRA.</p>	
Jane Scott	Y	<p>There is so little free space in our residential areas. WR3t Kentwood Hill / Armour Hill is like a set of lungs for the neighbourhood. The wildlife there, which has managed to be undisturbed and create a wonderful environment for natural growth and diversity for years. Let's be sensible and keep it safe and protect it.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>

Michael George Facer	Y	The land is a wildlife refuge, principally because of the badger sett, which makes it subject to the Protection of Badgers laws. It would be an act of vandalism to use the space for any other purpose, especially for development.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Jennifer Susan Cottee	Y	<p>Regarding the nature of the sites, the landlord 'decanted' plot-holders from these sites in 1997. Since then the flora and fauna have been largely undisturbed, making these sites now unique in urban Reading even though located in the well-wooded Tilehurst area. All other Local Green Spaces are cultivated to different degrees. Even with no public access, the extensive wildlife is valued by the local community. The extensive wildlife is noted and is a source of delight to many including myself.</p> <p>I understand it would be a very significant step to remove two sites from the list of development allocations, but I believe this is warranted by the pattern of relaxed management locally that has undermined the effectiveness of planning regulations and decisions for decades. Once development has occurred opportunities would have gone forever. It is not a timely to make such a decision. In the period of this Local Plan I trust there will be changes in behaviour of land-owners, and improved observance of planning requirements.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Jean H Rainey	Y	The land has considerable wildlife value, meets Objective 4 and 7 of the RBC's Sustainability Appraisal Framework and the Biodiversity Action Plan and Local Nature Recovery Strategies. It is ideal to already meet all these aims whereas other sites would only do so after a lot of (expensive) work. The wildlife is already on this site and has spread from a small nearby protected area. The area of land is small, right in the heart of Tilehurst and much loved by the locals. It could also be an extension to the West Reading Woodlands BOA.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate. Biodiversity Opportunity Areas are designated outside the Local Plan process.
Sarah Latcham	Y	This land is a peaceful oasis, providing a haven for wildlife - many of which are protected species. We have the privilege of watching the bats swoop over our garden at dusk and hear the owls hooting at night. It would be a travesty for local wildlife if this land was built on, as well as causing irreparable damage to the charm and character of the local area.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Anna Iwaschkin	Y	I consider that the land at Kentwood Hill (WR3s) and land at Armour Hill (WR3t) should qualify as Local Green Space. This is a pocket of land adjacent to urban streets in the Kentwood area and, as such, provides a tranquil oasis. It has strong amenity value in terms of its beauty, enhancing the	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at

		landscape. It provides a habitat for wildlife, muntjac, badgers, birds, among others, extending the wildlife corridor of Gypsy Lane which links the local parks, Arthur Newbery Park and McIlroy Park. There is a considerable spread of British wildflowers there and it has become a home for the Jersey Tiger moth which was, until recently, considered a rarity in Berkshire, mainly found only on the south coast after emigrating from France. With its rich and quite dense woodland and green growth the spot is providing clean air to the locality. All this contributes very favourably to Reading's response to Climate Change and the conservation of the natural environment.	Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Peter Evans	Y	Yes I think both WR3s and WR3t are well qualified to be designated as Local Green Space. These areas have never been developed. They make up vital green space in an otherwise increasingly developed area there is a huge and varied wildlife presence in this area.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Steve Hicks	Y	<p>You will have my previous written submissions on file setting out my support and justification for protecting this much valued, unique and rare area of unspoilt open space and a wildlife haven as well as the unique character it provides to the local area, and I would kindly refer you to them as supporting context to this consultation response.</p> <p>I have set out my specific consultation responses below under Q15 and Q75 of the consultation and drawn a brief conclusion at the end of this letter which I hope demonstrates that the sites qualify as local green space and are not necessary for housing supply.</p> <p>Q15: Do you consider that Land at Kentwood Hill (WR3s) and Land at Armour Hill (WR3t) would qualify as Local Green Space (LGS)?</p> <p>I consider that both sites qualify as local green space.</p> <p>The local community of Tilehurst benefits for and is therefore served by these two sites, the beneficiaries being local residents, allotment plot holders, dog walkers, regular bypassers and those who appreciate and benefit for the mental wellbeing of green spaces and interlinked wildlife corridors and areas.</p> <p>This is evidenced by the strong local support given to preserving these sites in the form of petitions, representations, public meetings and cross party Councillor and MP involvement. These sites are the only pocket of undisturbed wildlife habitat in Tilehurst, located within a suburban area and enjoyed as significant wooded areas for their visual and functional amenity value.</p> <p>Council officers supported the view when the Area Tree Preservation Order (TPO) was confirmed on the land in March 2022.</p> <p>Over 100 different species have been seen or heard in or above WR3s and WR3t and the Builders Yard and logged with TVERC. This data was used in the successful bid to get the whole area listed as a Local Wildlife Site.</p> <p>The land owner Tilehurst Poors Land Charity have refused independent access into the land for surveys so the range of flora and fauna biodiversity is potentially much greater.</p> <p>In terms of richness of the wildlife, 22 of the protected species or species of special concern listed in the Councils Biodiversity Action Plan have been noted on the sites and officially recorded by TVERC.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. This includes the areas with the known badger setts. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.

		<p>These include badgers, hedgehogs, slow worms, stag beetles, 6 species of bats, owls, deer and kites, all of which as a local resident I have seen in the vicinity of the site and links to Arthur Newbury Park.</p> <p>The <u>Badgers Trust</u> have been verified that the main sett on this site is situated within WR3s with satellite setts and pathways found throughout all the land surrounding the allotments and Victoria Rec. This is very rare for such an urban area.</p> <p>Without WR3s and WR3t left as wild, green space the <u>biodiversity</u> enjoyed by the wider community would be at risk. The recognised protected Areas of Biodiversity Interest of the Withies, McIlroy Park, land at the end of Armour Hill and Arthur Newbery Park would be hugely impacted by allowing houses to be built on WR3s and WR3t, thus losing these <u>wildlife corridor link corridors</u>.</p> <p>The <u>unique local characteristic</u> of these 2 sites is that they are not publicly accessible so the wildlife can thrive in these only areas in Tilehurst undisturbed by people. If these sites are not also given the same level of protection, then the biodiversity in the area will disappear. <u>Habitats are as important</u>, if not more so, than corridors to the wildlife and are unique and beneficial to the local area and local community.</p> <p>Another recognised characteristic of Local Green Space that applies to both WR3s and WR3t is their vital <u>contribution to the tranquillity, character and wellbeing of the local area</u>, giving a real appreciation of nature and a sense of countryside - a rare, precious and diminishing commodity in an otherwise ever expanding suburban area. Local residents value its <u>multiple benefits</u> for well-being and health - contact with wildlife in town, visual amenity and aspect and a, sense of space. In the Councils 2018 document “Local Green Space and Public Open Space Background Paper” local green space status was awarded to the Victoria Road Recreation Ground and Kentwood Hill Allotments as “...one of the most valued green spaces in the west of Reading and provides sports pitches and allotments, as well as habitat for wildlife”.</p> <p>Sites WR3s and WR3t are intrinsic to this and should have been included in the designation.</p>	
<p>Tilehurst People’s Local Charity</p>	<p>N</p>	<p>For the detailed reasons given elsewhere in this document and in the Lichfields document, the Land at Kentwood Hill (WR3s) and the Land at Armour Hill (WR3t) are not considered to qualify as Local Green Space. The designations of WR3s and WR3t as ‘Development for Residential’ should therefore not be changed in any way.</p> <p>The Charity answered RBC’s Calls For Sites in 2014 and in 2015/16, putting forward all of its land at Kentwood Hill and Armour Hill for consideration. An early draft of the Local Plan (pre- Nov/2019) constrained development to the area covered by the Builder’s Yard only. It is understood that the Planning Inspector decided that there had to be an integrated solution covering the wider area of land owned by the Charity, not a piecemeal consideration of small, separate areas. The subsequent designations, summarised below, were negotiated by RBC and agreed by the Planning Inspector as being acceptable.</p> <p><i>[for table of figures, see original response document].</i></p> <p>RBC planning conditions explicitly state “<i>Development should ... be supported by information showing how development fits within a comprehensive approach to the whole area (including [WR3s/WR3t] and the protection of the neighbouring allotments and recreation ground)</i>”.</p> <p>Whilst this was not perceived as a proportionate split between development and nondevelopment designations, the Charity has proceeded on the basis that the development sites WR3s and WR3t could and would be developed to the fullest possible extent.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. The importance of this area for wildlife is recognised within the information provided by the ecologist for the Charity’s development partners. However, the bulk of site WR3s and all of WR3t would remain in the plan.</p>

	<p>Since the Local Plan was adopted, the Charity has actively progressed these development sites through marketing, selecting a Development Partner, and co-operating with extensive surveys and other pre-planning-application activities.</p> <p>Comments in support of the Summary Responses</p> <p>Potential loss of charitable resources Any change to the designations of WR3s and WR3t would pose an existential threat to the Charity – one of the few charities able to award grants of money to families and individuals in financial hardship in the Reading and Tilehurst area. It is likely that the adverse consequences would be felt by many people in great need, for many years to come.</p> <p>Potential loss of urgently-needed family homes Any change to the designations of WR3s and WR3t would damage the ability of RBC to provide much-needed family homes in a highly-sustainable location – a location which does not suffer from flooding (unlike many other development sites on or near the Thames/Kennet flood plains).</p> <p>Suggested removal of car park and access track from WR3t This suggestion concerns a relatively minor change to the boundary of WR3t. It is considered more appropriate for this matter to be raised as an objection to a Planning Application (if needed), rather than as the subject of a further Consultation on a possible update to a Local Plan. The car park and access track were included in the development site WR3t so that the developer would have the flexibility and opportunity to offer improved access and parking facilities for allotment users on the northern (Armour Hill) side of the allotments area. It was hoped that the uneven, rutted, muddy, undrained ground currently in use might possibly be upgraded with a new access road and parking area – properly constructed, surfaced and drained.</p> <p>The suggested removal of the track and parking area would appear to be an attempt to interfere with planning processes as early as possible, even before a Planning Application has been submitted. The effect would be to preclude improved facilities which many allotment-holders might be very much in favour of. It should be noted that allotment-holders on the southern (Polsted Road) side of the allotments area may well benefit from improved access and parking facilities when plans for site WR3s are forthcoming. By opposing similar improvements for allotment-holders on the northern part of the allotments area, the persons suggesting the WR3t boundary changes would effectively put one set of allotment gardeners at a disadvantage compared with the other allotment gardeners.</p> <p>Potential claims for compensation The Charity’s actions in bringing its land to market have been contingent on there being a presumption of planning consent for sites WR3s and WR3t. The Charity has spent considerable sums with a legitimate expectation of recouping the money and raising much needed capital for its continued operations. If the designation of the Charity’s land as ‘Development for Residential’ were to be removed or adversely affected, or if any new barriers to planning consent are introduced, the Charity considers that it may have a case for seeking redress. The Charity would be under an obligation (to its beneficiaries and to the Charity Commission) to investigate the potential for obtaining compensation for monies expended and for loss of land values. Compensation claims may not be limited to those made by the Charity, as there are other professional bodies involved which might also choose to seek redress for losses suffered.</p>	
--	---	--

		<p>Potential actions to reverse any changes to the Local Plan In the event of any change to the designation or size of sites WR3s and WR3t, it would be incumbent upon the Charity to explore all possible avenues to nullify and reverse such changes. The Charity therefore reserves the right to take the necessary steps to challenge any proposed alterations to the relevant policies (by recourse to bodies such as: the national Planning Inspectorate, the Secretary of State, the Local Authority Ombudsman, the Charity Commission, the courts etc).</p> <p>Lack of clarity in Consultation Document about land ownership and public access Whilst the text of the Consultation document does refer to 'Local Green Space' (LGS), it does not make it clear to the readership that all of the Charity's land, whether LGS or not, is privately owned with no public rights of way. Consequently, some contributors to the consultation may mistakenly support suggested changes to the Local Plan in the belief that public access to the land would otherwise be denied or curtailed.</p>	
Allan Thompson	Y	<p>There is an abundance of wildlife in the woodland between Armour Hill and Kentwood Hill, including:- bat, doormouse, hedgehogs, badgers, muntjac deers, foxes, slow worms, newts, toads and a bird population including blackbird, wren, starling, blue tit, song thrush, mistle thrush, dunnock, 3 types of woodpecker, cuckoo and red kites.</p> <p>There is also the positive effect of having trees and greenery around us has on our mental health.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Tricia Marcouse	Y	<p>YES. The planning policies to provide structured playing fields (and the council's desire for some all-weather pitches) as well as general public open space for leisure activities and to benefit health make it hard to also deliver biodiversity goals and storage of carbon as a sink for climate emissions. Having an overall larger area allows for integration of these needs.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
BBOWT	Y	<p>Both sites already benefit numerous Tree Protection Orders (TPOs) and a significant proportion of the site is designated a priority habitat (Deciduous Woodland). Surveys conducted by Binfield Badgers Group on behalf The Badger Trust and it was found that the sites contained Main Setts which are occupied all year around and several smaller outlier setts connected to the main Sett(s). Badgers and their Setts are protected by law(see The Protection of Badgers Act 1992)</p> <p>I would suggest given these vey facts it makes these sites highly unsuitable for development. These sites were also previous nominated for Local Green Space (LGS) status but were refused in 2021 & 2022 respectively.</p> <p>I believe that a subsequent request for these sites to be designated LGSs has been submitted and BBOWT would fully support these nominations. The Trust is also aware that both sites have been</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is

		included in this years update as a proposed Local Wildlife Site (pLWS). If LWS status were to given then these sites would again be no longer be suitable for development.	brownfield, so designation of the full area is not considered appropriate.
Linda Maule	Y	<p>I am writing in support of the proposal that land at Kentwood Hill (WR3s) and Armour Hill (WR3t) be designated as Local Green Space.</p> <p>The area has an incredible diversity of wildlife that is not found elsewhere in Tilehurst as the area is so built up. We regularly see foxes, deer, hedgehogs, badgers and so on and it has many bird and insect species due to its unspoilt nature. I feel it would be extremely detrimental to local wildlife were these areas to disappear, there would simply be nowhere else for wildlife to thrive as it does there now. It would also cut residents off further from access to a natural environment, and mean that an important part of Tilehurst's natural beauty (such as is left of it) would be lost for future generations.</p> <p>Please listen to local voices and designate these spaces as Local Green Space.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Zara King	Y	<p>This space is home to lots of wildlife, I have spotted deer, rabbits, foxes and badgers. Not to mention the amount of birds and insects the flora and fauna attracts. This green space is vital for the local community who visit and nurture the land. It is tranquil and area of beauty that should be preserved.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Caroline Pegrum	Y	<p>a. in reasonably close proximity to the community it serves</p> <p>The land is in close proximity to the community it serves as a number houses overlook it and there are constantly pedestrians walking up Armour Hill alongside it. It can also be viewed by the holders of the allotments that border it.</p> <p>b. demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <p>The land is very special to the local community and gives the area its tranquil rural character. It is extremely rich in wildlife. I often notice that I hear more birdsong on this land than I do in the countryside. I also understand that there are badgers living on the land.</p> <p>The land is also of great beauty, constantly changing with the seasons. It is particularly beautiful in spring when the numerous blackthorn and hawthorn bushes are covered in blossom.</p> <p>It would be an act of vandalism to destroy this pocket of countryside in Tilehurst that gives pleasure to so many and is home to so many different species. Therefore, I consider that it should qualify as Local Green Space.</p> <p>c. local in character and is not an extensive tract of land</p> <p>The site is local in character and not an extensive tract of land.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.

The Woodland Trust	Y	Would support their designation as Local Green Space on the basis of the presence of woodland (Priority Habitat Inventory - Deciduous Woodland).	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Simon Shiel	Y	The land is important for local wildlife. I've seen foxes entering and leaving the area referred to as WR3s which is a quieter area, (in terms of human activity), than the adjacent green spaces of the Victoria recreation ground and allotments. I would like to see WR3s and WR3t designated Local Green Space to prevent wildlife from being squeezed out of the area. WR3s in particular acts as a link between the Victoria Recreation ground and the allotment site.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Nicky Caton	Y	It is a dense thicket full of wildlife and creates an essential wildlife corridor in a densely populated area. This is rare and if preserved can be celebrated as an example of how Reading planning is considerate of preserving irreplaceable ancient ecosystems like this when planning development.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
David Hargreaves	Y	The area is the home to a wide variety of wildlife. It is also a tranquil area and should be left alone.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Binfield Badger Group	Y	Binfield Badger Group have worked with the Keep Kentwood Green group on their submission to keep the referenced spaces green and have conducted wildlife and sett surveys across the area and registered these findings on our records – these are kept as reference as we work with councils across Berkshire where we provide information, and comment on the impact of developments and local plan proposals.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. It also includes those areas where badger setts are known to be located

	<p>During numerous surveys of the area we can validate that the main sett on this site is within WR3S and numerous runs and notable badger activity link this main sett with other subsidiary setts and outliers that extend across the land referenced and onto the land that surrounds the allotments and Victoria Recreation Ground. A badger clan will occupy and defends a territory. Within this territory, the group usually has a number of setts, categorised as main setts, annexe setts, subsidiary setts and outliers. Main setts are occupied all year round, while outliers are occupied more intermittently. Setts have a range of uses for the badger, including sleeping quarters and weaning sites. They are also used for cover when a badger perceives danger. Despite their robust build and aggressive inter-badger behaviour, they are neophobic and will readily run away and hide in the face of circumstances not encountered before. It is therefore important that the badgers across WR3S and WR3T and the surrounding land are not disturbed and are left to live and roam freely. Badgers are specifically protected under the Protection of Badgers Act 1992, the only mammal in UK law to have its own Act.</p> <p>Badgers forage nightly, often travelling significant distances – as witnessed by the badger evidence we were able to gather at the site. They are omnivorous, although about 50% of their diet consists of earth-worms when available. Up to 200 worms may be eaten in one night. Pasture provides approximately 5 times as many worms as woodland and is therefore a vital part of their territory. A badger's diet also includes insects, fruits, berries and small mammals. Their feeding may be significantly negatively impacted by disruption (such as construction work or human habitation) as they can withdraw underground for many hours. Throughout WR3S, WR3T, we found strong signs of foraging across the grassed areas and into allotments and Victoria Recreation Ground. It is fundamentally important that these areas are left protected, wild and green with no access to the public, enabling badgers and other wildlife to live, breed and forage undisturbed.</p> <p>Please support the submission by the Keep Kentwood Green group to protect WR3S and WR3T as local green space.</p>	<p>and a buffer around them, The wider Local Green Space designation therefore leaves a considerable amount of land protected for development and available for badgers to live and forage.</p>
--	--	---

Additional representations submitted via email/post regarding Land at Kentwood Hill & Land at Armour Hill

Respondent name	Comments	RBC Officer Response
Jo Skidmore	<p>I noted with interest proposals to designate land at Kentwood Hill as designated green space. We have lost swathes of green space, now even encroaching onto Sulham woods. It is getting harder when walking in Tilehurst to get a respite from urban sprawl. But even more than this the land at Kentwood is the only substantial area I know of in Tilehurst which is largely untouched. How precious is that at a time when biodiversity has never been more important. Walking past it you get an immediate sense of quiet and calm tuning into sounds of animals you just don't hear elsewhere in Tilehurst. Of course we need housing, but please use other spaces that don't have such a unique natural value. This is an opportunity for the council to demonstrate its commitment to the green agenda.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
Carol Jackson	<p>I write in support of the proposal to change the designation of land on Kentwood and Armour Hills, from suitable for residential development to local green space. I would like to see this change for the following reasons: These spaces are significant to the environment, and for nature and wildlife. For wildlife and nature to flourish there needs to be safe protected spaces. Currently these areas hold a myriad of wildlife and nature, all of which would be lost if it became a site for residential development. Therefore, these areas need to be protected from residential development. Green space is fundamental to the health and well-being of residents in this area, and to the community of Tilehurst. On many occasions such areas are destroyed in pursuance of residential developments with an accompanying tragic loss of wildlife. Green issues have never been more</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>

	important than they are right now. We are seeing the impact of climate change on a more regular basis. We need to do all we can to limit further damage to our planet, starting with small scale changes at the local level. Reading has so much to be proud of, and the retention and future protection of these green spaces will make a massive contribution to a continued and very important focus on environmental issues. Please do all you can to protect these spaces from residential developments for now and for the future.	
Sally Archer	I would like to express my reasons for making this very precious piece of land a local green space. You only have to walk into this lovely green space to transported away from the noise and bustle of Tilehurst. to watch the abundant wildlife, Badgers, foxes, Bats, Owls, slow worms hedgehogs, deer and much more and you can hear the birds once away from the busy roads. I walk through this land almost daily and is like a breath of fresh air. The stream through the Withies is beautiful with newts, toads and frogs. Where will all this wildlife go if bulldozed? mostly killed off and lost forever for local people and the children coming behind us. We need these pieces of green space for wildlife and trees for our planet and our well being and as the much needed building increases we cannot afford to lose these little pockets of loveliness.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Cathy Szklar	I am writing in response to your application to build on the green space. I would like to submit my concerns that this should be allowed to go ahead and object to the planning application. As an area of historic significance, beauty, recreational value I do not feel it is appropriate for development. Equally the tranquillity and richness in wildlife is also of great importance to the area and wildlife and also the community's mental health and wellbeing. The above-mentioned area holds great significance to the local community. It is frequently used for group recreational activities, whether is organised sports, fates and gatherings or using the green space for individual reasons such as meeting with friends and family. The area has a positive impact on the community's mental and physical health and wellbeing. The increase in fumes, traffic and lack of available parking would have a detrimental impact on the area, wildlife as well as the local community should this be allowed to go ahead. To this end I would like to submit my objection to the planning proposal to develop this site.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Elaine Digweed	This area of natural beauty is the housing estate for all the wildlife and animals, that live there. It is an ecologist paradise for educating children the importance of keeping a green space, for our wildlife neighbours. In the evenings you hear the deer calling to each other, the foxes have got used to their neighbourhood and are very passive to humans. The hedgehogs and their little families scurrying through the undergrowth, with Badgers, lying low now, as the sets were pestered when the TPLC decided to strim and cut down undergrowth, frightening badgers to cross the road and get run over. There are plenty of brown sites and old houses to be refurbished, why steal from the wildlife. Also Armour Hill is so narrow, it would not be able to cope with such a development and the bottom is always flooded at the junction of Armour Hill and Kentwood Hill	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Denis Page	I am unable to participate in the KKG [Keep Kentwood Green] Facebook group but emphatically support its aims. There are few trees in the area and the recent high winds have caused a lot of damage and blown some down as with a mature horse chestnut. With its trees and shrubs the area acts as the "lungs" of a range of birds and animals which often appear in our gardens including small deer, foxes, green woodpecker, hedgehogs etc and is enjoyed by many other people for its peace and quiet. Please allow this to continue if only to counter pollution.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Mary Bartlett	As an ex allotment holder I'm writing to support the cause to keep the land as it is. It's vital in this day and age to protect what wildlife we have. On my plot alone I had many slow worms which are protected. And on many occasions I would see foxes and one particular one would sit quite near and watch people on their plots. Many times during the growing season some of the crops would be eaten but most of us were ok with that, I used to grow extra sweet corn because the badgers loved them. And cover and protect anything I wanted to keep. It would be tragic if we were to lose this piece of land to buildings, once it is gone where will these animal go. I have been told that there are over a hundred different species on the land. We all need to protect them, for future generations.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.

<p>Glenda Kirton</p>	<p>I would love to see the site kept as it is. This is a one and only chance to keep a tiny piece of England forever green!!!</p> <p>Your Planners will look back and say we've got it right to keep this a green land, fresh air, mental wellbeing and so many more benefits.</p> <p>I know so much more about what went on over the years with the wild life, the piggery and the people i spoke with, doing work for the Trustees.</p> <p>I have loved every day that i have spent on my allotment.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
<p>Rebecca Croft</p>	<p>I share the same views as many, many residents; This space, which is now occupied by a staggering number of wildlife, both common and protected species, has to be granted a change of land designation from 'suitable for residential development' to a local green space that can be fully protected for our valuable and vulnerable wildlife.</p> <p>As a political party, you must see that although the need for housing is there, squashing it into an area already suffering with lack of amenities, school places, medical and dentistry provision, roads that are continually deteriorating and a Thames Water system that is constantly failing, this is not the right piece of land for housing.</p> <p>Please change my mind about our Labour run council, and protect this land for the wealth and benefit of our wildlife, younger generations, and generations to come. Less green spaces equals loss of biodiversity that will never be reclaimed.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
<p>Marian and Nick Ward</p>	<p>This is not a suitable area for housing as it is home to many protected and common species of creatures and we cannot afford to lose any of our wildlife or green spaces in this world.</p> <p>We appreciate that more housing is required in the town but building on this site would cause more stress on an already stressed infrastructure and be of little benefit to the surrounding area.</p> <p>Please consider the importance of saving our green spaces in urban areas for the long established wildlife and for the benefit of our future generations. Children must experience the pleasure and education given from witnessing wild creatures around them and learn to understand the importance of allowing all life to thrive.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
<p>Eileen Carr</p>	<p>Tilehurst, like so many other areas on the outskirts of Reading, is being over-developed with housing, leading to evermore traffic congestion and pollution. This relatively small parcel of land at Kentwood Hill/Armour Hill is not only a 'green lung' for the residents living in the local area, but also provides a small oasis for the wildlife that inhabits the surrounding woodland. It has been widely agreed and publicised that these areas are essential for the health and wellbeing of communities living in a world that is turning ever faster, thus creating more and more pressures daily and we are all aware of the toll on mental health. So many valid reasons, therefore, for this particular piece of land to qualify for and to be protected as Local Green Space. I do hope that there is a favourable outcome on this matter when all considerations on this proposed are taken into account and deliberated by RBC Planning Committee.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
<p>K. A .Imber</p>	<p>It is essential that the land identified under the banner 'Keep Kentwood Green' is designated as a Local Green Space and therefore protected from development.</p> <p>The reasons for this are as follows: The Reading Climate Emergency Strategy 2020-2025 acknowledges we are in a climate crisis. And as such your strategy has a Nature Theme Action Plan which recognises that Reading's green areas and open spaces are important ' not just for their own sake, but for the benefits they offer to our health and wellbeing'. You have adopted policies in the local plan to ensure green spaces are</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>

	<p>joined up, and ensuring that you create and improve wildlife corridors. The area in question in Kentwood is such a green and open space, and a wildlife corridor between McIlroy's Park, Arthur Newbury Park and Sulham. Your priorities also include "...managing existing natural habitats to sequester and store more carbon." "...increasing permeable surfaces ...to store water ...to mitigate flood risk." Building on this piece of land will release carbons and create increased pollution if developed into a housing estate, cause increase in runoff of rainwater resulting increased flooding of the Kentwood and Armour Hill junction. N8 of your action plan refers to increasing hedgerows - these exist on the site in question which are an ideal habitat for nesting birds and small mammals, including slowworms.</p> <p>In summary development of this land is contrary to the Reading Climate Emergency Strategy 2020-2025 and its incorporated action plans.</p>	
<p>Kate Jane</p>	<p>When deciding whether this land is to be protected or designated land for development please take the following into consideration:</p> <ul style="list-style-type: none"> • This land, once cultivated, is possibly the best example of re-wilding in Reading. The site is well populated y trees, including fruit trees, brambles etc. providing dense undergrowth ideal for the needs of wildlife and the close proximity to allotments provides seclusion. • It provides a buffer between the road and allotments, shelters the area, reduces road noise and pollution and disguises the existence of buildings close by. The allotment area therefore enjoys a tranquillity akin to the countryside rather than its urban site, enjoyed not only by plottolders but those passing through on their daily business. Even the briefest commune with nature is known to be good for mental health. • Development of this site would destroy all this and displace animals, many of which are of a protected species. Where would they go? There is no comparable site in the area. • In an era where eco concerns are to the fore and we are all being urged to re-wild our gardens and open spaces, destruction of this important site does not make sense. 	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
<p>Lichfields (OBO Tilehurst People's Local Charity)</p>	<p>The implications of both suggested approaches [within the LPPU] would be to remove or reduce (potentially substantially) the quantum of residential development currently allocated on the site through the two residential allocations.</p> <p>All matters associated with each of these allocations was fully addressed through the RBLP examination process culminating in the Local Plan Inspectors conclusion (para 110) that "the allocation of the two sites is therefore justified"</p> <p>TPLC do not consider there to be any Public Right of Way (PRoW) within the sites and this is consistent with RBC's online Cycle and Walking Network map. There are a number of designated LGS's and Public Open Spaces (POS) in close proximity to the Kentwood and Armour sites (represented by green shading in figure 1 within the PDF document).</p> <p>Approach to LGS in the NPPF and adopted RBLP See NPPF para 105 and 107 (re Local Green Space). On this basis, it is clear that designation of the sites as LGS, alongside the removal of their allocations within the RBLP (2019) would prevent the delivery of development allocated by policies WR3t and WR3s, whilst partial allocation as LGS and / or other alterations to WR3t and WR3s would at least fetter, and potentially prevent such residential development.</p> <p>Paragraph 106 of the NPPF sets out the circumstances in which a LGS designation should be used. In terms of how LGS designation relates to development, see PPG (PPG Reference ID: 37-007-20140306) See RBLP Policy EN7 which defines the boundaries of the LGS (and also POS).</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Given that this area contains badger setts and a base for wildlife that is of particular importance locally, this is considered to be justified. The importance of this area for wildlife is recognised within the information provided by the ecologist for the Charity's development partners. However, the bulk of site WR3s and all of WR3t would remain in the plan.</p>

<p>Previous assessments of the sites for LGS designation The site’s potential for designation as LGS has been considered previously in the planmaking process relating to adopted RBLP (2019), but at no point has it been considered to warrant this designation. An overview of the site’s assessment in this regard is provided below.</p> <p>The Kentwood site and Armour site (with the exception of the builders yard) together with the wider land under the ownership of TPLC were listed as one of the “potential sites for local green space designation” under reference numbers 31 and 32 in the Consultation on Issues and Options (2016, page 129)6.</p> <p>However through the subsequent stages of draft Local Plan (ie the pre-submission draft Local Plan, Submission Draft Local Plan and the adopted RBLP), RBC removed the Kentwood and Armour sites from the potential LGS designation, only designating the ‘Victoria Recreation Ground and Kentwood Hill Allotments’ LGS. The Kentwood and Armour sites were instead proposed for allocation for residential development under allocations WR3s and WR3t. The RBLP, including policies WR3s and WR3t, was found to be sound and legally compliant (subject to a number of main modifications) and was adopted in November 2019.</p> <p>The Local Plan Inspector also noted (para 39) that “the assessment of sites for Local Green Space and Public Open Space in Policy EN7 (Local Green Space and Public Open Space) is up to date, and the methodology used to assess sites is robust.”</p> <p>On this basis it is clear that both sites, and the wider area, have previously (and recently) been assessed for designation as LGS by RBC during the plan-making process, but were not considered to be appropriate for such a designation. Instead, the Kentwood and Armour sites were considered for allocation of residential development and assessed by an Inspector during examination of the RBLP (2019) who concluded “the allocation of the two sites is therefore justified”7 (Inspectors Report on the Examination of the Reading Local Plan, 2019).</p> <p>We note that RBC have not sought to reopen their assessment of LGS through the LPPU process. There are therefore no factors which suggest an alternative conclusion about the principle of allocating the sites for residential development should be reached through the LPPU process.</p> <p>Assessment of the sites as LGS Our client considers that the Kentwood and Armour sites remain appropriate (and in great need) to accommodate residential development in line with its allocation in the adopted RBLP. Our clients also consider the sites do not warrant designations as LGS in line with the requirements of paragraph 105 and 106 of the NPPF for the following reasons.</p> <p>Sustainable development See NPPF para 105 and para 7</p> <p>Within the LPPU, it is evident that meeting housing needs is a key component of achieving sustainable development for Reading, through the LPPU.</p> <p>The LPPU also identifies “delivering family housing in Reading is difficult due to the emphasis on high density town centre sites” (LPPU para 8.20) and that there is a “significant need” (LPPU 8.13) for family housing outside centres. In respect of the Kentwood and Armour sites, the LPPU specifically notes “The existing</p>	
--	--

<p>allocation would provide much needed housing, including likely family housing, to help to meet Reading's needs" (LPPU 12.66).</p> <p>It is considered that designation of the sites fully or partially as LGS, would fetter / remove the delivery of much needed housing at the sites, and frustrate the RBC's ability to meet its needs. This is recognised within the LPPU which states in relation to the site "the Local Plan is not in a position where it can generally afford to lose existing allocated housing sites" (LPPU, para 12.66). Our client considers that proposals to amend the development allocation for the sites would not represent sustainable development as envisaged by the NPPF, and would conflict with the approach to designating LGS set out by the PPG which states: "Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making." (PPG, Reference ID: 37-007-20140306)</p> <p>Assessment of NPPF paragraph 106 considerations The tests set out by paragraph 106 require, inter alia, that LGS be demonstrably special to a local community and hold a particular local significance. This wording makes clear that both are required.</p> <p>The availability of LGS and POS in the immediate vicinity of the site, which is in close proximity to the same community adjoining the Kentwood and Armour sites is summarised above. The existing POS and LGS features public access, and therefore can actively contribute to the local community's ability to meet its recreational needs. No evidence has been provided that the Kentwood and Armour sites are "demonstrably special to a local community and hold a particular local significance" (NPPF, 106b) indeed this would form a very high bar given the alternative options summarised above.</p> <p>It is noteworthy that the site and the adjoining land were previously nominated for the inclusion on RBC's List of Assets of Community Value (ACV). Both nominations were refused and in RBC's decision letter for the 2021 application, the Council noted that the builder's yard, which is within the sites' boundary, "...is used commercially and therefore not used by the local community." It went on to state that "there is insufficient information provided in the nomination to satisfy the Council that the local community has any actual current use of the withies, woodland and surrounding area therefore the nomination does not meet the criteria for listing." The decision letter also noted that "access to the allotment is included within personal agreements and not public access."</p> <p>In the decision letter for the 2022 application, RBC highlighted that in the nomination, it was suggested that "the land has been inaccessible to humans and their dogs for decades". The Council concluded that "there is insufficient information provided in the nomination to satisfy the Council that the local community has any actual current use of the Land."</p> <p>There is no further information to suggest the analysis and conclusions of the (very recent) 2021 and 2022 ACV applications do not remain valid. This analysis confirms that the Kentwood and Armour sites do not have any public access and the local community had no use of the site in 2021/2022. On this basis, and considering the noted availability of alternative POS and LGS in the immediate vicinity, our client considers the sites do not hold a particular local significance in terms of recreational value.</p> <p>There are no statutory listed building/locally listed buildings within the sites or in the vicinity of the sites. The sites do not fall within any conservation area. The conservation area closest to the sites is the Routh Lane</p>	
---	--

<p>Conservation Area, which is over 2km (straightline distance) away from the sites. Our client considers the sites do not hold a particular local significance to the local community, in terms of historic significance.</p> <p>Our client and their development partners are undertaking substantial survey work to inform the site's development potential, including detailed matters which would support a future full planning application. Our client has confirmed initial analysis has identified that the sites do not include any physical or ecological features which would represent a fundamental constraint to development of the site in line with allocations WR3s and WR3t, which in itself includes provisions for accommodating green links and avoiding adverse impacts on trees and biodiversity. On this basis our client considers the sites do not hold a particular local significance due to a richness of wildlife.</p> <p>Furthermore the Inspector's Report on the Examination of the Reading Local Plan recognised the requirement for residential development at the sites to mitigate detailed impacts, and that this could be done effectively through the allocations, stating: "...development of the rest of the two sites would be subject to a significant number of criteria. These amongst other matters include the requirement to demonstrate how schemes fit within a comprehensive approach incorporating the allocated sites as well as the allotments and recreation ground. It would also require assessment and mitigation of local junction impacts, avoiding adverse impacts on the West Reading Wooded Ridgeline major landscape feature and on biodiversity. With the requirements as set out, these would be effective in mitigating any adverse impacts, and the allocation of the two sites is therefore justified." (para. 110)</p> <p>In summary our client considers that proposals to amend the development allocation for the site would not represent sustainable development as envisaged by the NPPF. They also consider that for the reasons outlined, the sites are not "demonstrably special to a local community, nor do they hold a particular local significance in terms of beauty, historic significance, recreational value...tranquillity or richness of its wildlife" (NPPF, para 106b). On this basis the designation of the site as LGS is not considered to be justified in line with the relevant considerations outlined by paragraph 106 of the NPPF.</p> <p>Assessment of the alternative option to designate the sites as LGS apart from the built elements</p> <p>The LPPU notes that "as well as the main options of leaving the designation as it is, or identifying the entirety of the two allocated sites as Local Green Space, an alternative option could be to identify everything apart from the built elements (essentially the builders merchants) as Local Green Space" (LPPU, para. 6.12). The LPPU goes on to note that "essentially this approach was in a submission version of a previous development plan, and the Inspector deleted it as it would not represent a comprehensive solution to the wider area" (LPPU, para. 6.12).</p> <p>This alternative option would again involve designating part of the sites as LGS, and our client remains of the view that this is not justified on the basis of the relevant considerations outlined by NPPF paragraph 106, for the reasons already outlined.</p> <p>Our client would like to reiterate that the development option to allocate only the existing built elements (the builders yard) for residential use was thoroughly assessed during the preparation of the Site and Detailed Policies Document (2015). The principle of this approach was refused by the Inspector who stated that "it would be out of place in the context of surrounding open land and would result in piecemeal development that would not address the future of the wider site"¹⁴ (RBLP Consultation on Issues and Options January 2016, p. 57). Our client concurs with this clear conclusion provided by the Inspector.</p>	
--	--

	<p>This development option was also considered in the preparation of the now adopted RBLP (2019). The option was considered under the option ref. no. A14d, referred to as “Identify previously developed part of the site only - Approx. 11-17 dwellings” within the Issues and Options Consultation of the adopted RBLP (p. 57). Nonetheless this approach again was discounted from the adopted RBLP. Conversely the adopted RBLP in Policy WR3t and WR3s includes specific provision for any proposed development to be comprehensive, stating development should be “supported by information showing how development fits within a comprehensive approach to the whole area”.</p> <p>Our client notes the numerous assessments already undertaken about this development option and considers that reducing the area of the site allocations could prejudice the delivery of development. This would be inconsistent with the NPPF’s aims for sustainable development and would remove/prejudice comprehensive delivery of sites that would make a valuable contribution towards the council’s increasing housing need, including that for family housing outside of the centre.</p>	
--	--	--

Q. 16 Do you agree that Ibis Club and Scours Lane be designated as Local Green Space? (This question relates to policy EN7)

Respondent name	Y/N/ Other	Comments	RBC Officer Response
James Ford	Y	All pristine green space & all recreational green space left within the borough should be protected & preserved. Development should be restricted to brown field.	See officer response to Q. 12.
Mark Treder	Other	You may designate leisure/ green space: but if a developer come in with the right offer.....you will change your mind	No change needed. It is noted that there is a legal requirement for planning decisions to be taken in line with the development plan unless material considerations indicate otherwise.
Paul Oliver James Melville	N	too close into town.	Do not agree, no changes proposed. This matter is not included within NPPF criteria on what qualifies as a LGS and is therefore not a consideration, and a number of existing designated Local Green Spaces are within close proximity to the built-up town.
Natural England	No answer	See answer to Q. 15	See Officer response to Q. 15
Sport England	Other	<p>It is not very clear on why this is needed as the playing fields are protected under paragraph 103 of the NPPF.</p> <p>As we have noted in response to question 16, the adopted playing pitch strategy (PPS) in 2021, is now considered out of date by Sport England as the data behind the strategy was several years old, by the time PPS was adopted. There has been no regular 'Stage E meetings' as the methodology, which was used, advised. The Stage E meeting would update the participation date, keeping it up to date and update the action plan and note any provision coming online or any provision which has been lost.</p> <p>We would suggest that a detailed overhaul of the current PPS is carried out as soon as possible.</p> <p>Also we would advise that a built facilities strategy is commissioned to provide an evidence base of built facilities for the Local Plan.</p>	<p>No changes proposed. The Ibis Club and Scours Lane are important recreational and leisure spaces which are not specifically covered by other Local Plan policies. In addition, these updates would ensure alignment with the recommendations as set out within RBC’s Playing Pitches Strategy (2021). Designation as a Local Green Space also ensures additional protection from development as set out in paragraph 107 of the NPPF.</p> <p>The Playing Pitches Strategy is completed by the RBC Leisure team. It does not comprise a planning document and therefore its update is beyond the scope of the LPPU. Furthermore, it is not clear how updating the Playing Pitches</p>

			Strategy would materially alter policy EN7 or the changes proposed to the existing playing pitches within the LPPU. The strategy was only adopted in 2021 and is therefore not considered to be sufficiently antiquated to warrant an update, notwithstanding the fact that the data precedes its adoption date.
Jean H Rainey	Y	Local amenity value.	Answer is noted. No changes needed.
CAAC	N	<p>The playing pitches strategy states that all playing pitches are protected in the New Local Plan, however the nature of this protection is unclear unless it is included within Policy OU1, New and Existing Community Facilities. We are particularly concerned about the Reading School playing field on Morgan Road within the Kendrick CA. The playing field is somewhat detached from Reading School and we feel this places it at additional risk of potential development over and above that attaching to public parks, sports clubs and other school playing fields. The visual contribution to the CA is minimal but as an area with grass and hedges it provides an area of biodiversity.</p> <p>The playing pitch strategy is not within the planning policy documents and is only referred to once (Downing Road Playing Field within policy WR2) in the New Local Plan so is not a document that is easily available or in any way associated with planning.</p> <p>We propose that the policy in relation to playing pitches should be made more prominent, maybe playing pitches should have their own policy? In the absence of that that more playing pitches, in particular Reading School playing field as it is detached from the school it serves, should be added to the local green space list.</p>	<p>Minor change proposed to add reference to the updated Playing Pitch Strategy under OU1: New and Existing Community Facilities.</p> <p>RBC does not agree that Reading School playing field should be given special protected status. Any proposals for development on the site would be carefully considered and would balance the need for development with biodiversity interests and impacts on the Conservation Area. The Local Plan states under OU1: "Given the dense, built-up nature of Reading and the lack of appropriate new sites, it is inevitable that some of the Borough's community facility needs will have to be met through intensification of the use of existing sites. This has particularly been the case on school sites in recent years, and this is likely to continue to be an important aspect of new provision. In some cases, this may mean some development on open areas within the site. This can be acceptable in some cases but needs to be balanced against the provision of adequate sports and play space, bearing in mind the national policy presumption against loss of playing fields in the NPPF, and other issues such as impact on biodiversity."</p>
The Woodland Trust	Y	Support and would encourage increase in tree canopy cover to complement recreational use, given the relatively levels of tree equity identified in the UK Tree Equity Score, and to align with the Reading Tree Strategy.	Answer is noted. No changes proposed. Increase in tree canopy cover is dealt with under Policy EN14.
M Langshaw	Y	As in the document.	Answer is noted. No changes required.

Q. 17 Do you agree with the proposed level of biodiversity net gain to be sought? (This question relates to policy EN12)

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Y	All pristine green space & all recreational green space left within the borough should be protected & preserved. Development should be restricted to brown field.	See officer response to Q. 12.

Adam Boulding	Y	and id go even further	Answer is noted. However, without detail/suggestions on how to go further with BNG it is difficult to incorporate these suggestions.
Henry Wright	N	Seek higher 20% - we are an urban area which attracts larger developers who can easily meet such a target.	No changes proposed. Although comments are appreciated, PPG guidance ¹ states that plan makers should not seek a higher percentage than 10% unless justified. In addition, given the urban nature of the borough, a 20% increase be difficult to deliver on/offsite in practice and is likely to affect viability.
Mark Treder	Other	As above	See officer response to Q. 16.
Wiltshire Swifts	N	Because a new iteration of a Local Plan takes so long from start to adoption, new versions need to be ambitious and forward thinking to mitigate against them being out of date before adoption. Many councils are adopting 20% net gain in biodiversity which will help ensure their Local Plan is best placed to address the gaining momentum of the importance and need to protect wildlife and biodiversity.	No changes proposed. Although comments are appreciated, PPG guidance states that plan makers should not seek a higher percentage than 10% unless justified. In addition, given the urban nature of the borough, a 20% increase be difficult to deliver on/offsite in practice and is likely to affect viability.
Nicholas Gumbridge	N	I understand the rationale for going with the 10% minimum - but would be nice to see the ambition to go for 20%, if others are able to adopt 20% maybe their knowledge could be leveraged?	No changes proposed. Although comments are appreciated, PPG guidance states that plan makers should not seek a higher percentage than 10% unless justified. In addition, given the urban nature of the borough, a 20% increase be difficult to deliver on/offsite in practice and is likely to affect viability.
Louise Cole	Other	The forthcoming BNG assessment formula excludes the installation of artificial nest sites for birds in applicable new developments and building extensions. This is a serious omission, as red-listed birds can be effectively supported by the provision of artificial nest sites (swift bricks or nest boxes). Eg, swifts (a migrant colonial bird species, red-listed since 2021) nest exclusively in cavities in buildings, eg eaves and holes in walls. Green infrastructure does not offer nesting habitat to swifts. As older buildings are replaced or renovated, longstanding natural swifts' nests, are lost. Swift pairs are nest-faithful and return to their habitual nest sites year after year. If a pair's nest site has been destroyed, the swifts have great difficulty in finding an alternative nest site, as cavities in buildings are now very scarce. Consequently, UK swift numbers are in steep decline and the species is heading towards extinction in the UK. Please ensure that special provision is made for artificial nest sites in the Reading policy documents, and make sure the additional policy guidance on installation of swift bricks is followed, eg through planning conditions. Swift bricks support other endangered birds in addition to swifts, eg the red-listed house sparrow, starling, and house martin. Swift bricks are regarded as 'universal' bird nesting bricks. Swift bricks are superior to nest boxes as they are	Answer is noted. Change partially agreed. Policy EN12 will be amended to set out that wildlife friendly design must be incorporated within new developments, including, for example, the provision of bird nesting and bat roosting opportunities within new buildings (such as universal swift bricks and bat bricks or tiles). Where applicable, conditions can be added to a decision notice that requires the provision of ecological enhancements such as swift bricks to address this matter.

¹ See paragraph 006 [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain)

		<p>permanent, temperature stable and discreet. Please specify that best practice is adhered to during swift brick installation in terms of numbers of swift bricks and positioning (as per references below).</p> <p>Existing swift nest sites should be identified, recorded on the RSPB's Swift Mapper: https://www.rspb.org.uk/swiftmapper Efforts should be made to protect existing nests throughout the year.</p>	
Natural England	No Answer	<p>Other policies can also be developed in line with the mandatory BNG requirement to provide other onsite biodiversity enhancements, such as a requirement to incorporate ecological enhancements into landscaping and building facades/roof spaces (such as elements of native planting, pollinator friendly planting, bat/bird boxes, hedgehog gaps in fences etc).</p> <p>We also recommend RBC utilise the Urban Greening Factor (see the Natural England Green Infrastructure Framework for more details Green Infrastructure Home). This approach works alongside Biodiversity Net Gain to help set the quantity and functionality of Green Infrastructure that should be delivered on-site. The Urban Greening Factor (UGF) is one of the five headline Green Infrastructure Standards. It is a planning tool to improve the provision of Green Infrastructure and increase the level of greening in urban environments. Where the baseline biodiversity is low, the UGF can ensure development still promotes more nature-rich environments that increase the functionality, sustainability, and climate resilience, particularly in dense urban areas. It is applied to major developments and sets a target score for the proportion of Green Infrastructure within a development site for specific land uses. It can be introduced through planning policies and strategies to increase Green Infrastructure provision across an entire local planning area, or it can be applied to specific locations. It was introduced in the UK in 2015 and is now a prominent Green Infrastructure policy tool in the London Plan (2021) and is increasingly being used by Local Planning Authorities in the revision of their local plans.</p> <p>F If Reading Borough Council would like support with in particular setting up an Urban Greening Factor Policy, producing a GI Strategy and reviewing and seeking to include policies which cover the 5 headline standards in the local plan (or associated strategies with appropriate planning weight), Natural England would be happy to discuss further.</p>	<p>Answer is noted.</p> <p>Policy EN12 covers biodiversity more generally and requires development to provide ecological enhancements wherever possible. Changes are proposed to the policy wording so that it sets out specific requirements for wildlife friendly landscaping (such as bat roosting opportunities). However, beyond this, it is not considered that specific requirements for ecological enhancements are necessary as the potential for ecological enhancements is subject to site layout and proposals and is usually dealt with by way of condition where deemed necessary.</p> <p>A new policy EN19: Urban Greening Factor is proposed.</p>
FCCG	No Answer	A more ambitious target should be adopted as soon as is feasible.	<p>No changes proposed. Although comments are appreciated, PPG guidance states that plan makers should not seek a higher percentage than 10% unless justified.</p> <p>In addition, given the urban nature of the borough, a 20% increase be difficult to deliver on/offsite in practice and is likely to affect viability.</p>
Sport England	N	This can not be a full-brush policy over the whole of Reading as it will be in conflict with other national Policies. For example, if a sports club comes in for an extension to the club house, the suggested biodiversity net gain, could result in the loss of playing field which would be in conflict with paragraph 103 of the NPPF (Dec 2023)	No changes proposed. This policy is guided by and must align with the national legislative framework. Offsite enhancement is an alternative option should onsite net gain not be possible as per the biodiversity gain hierarchy.
HBF	Y	Yes, the HBF agree with the Council's current intention not to go beyond the 10% statutory requirement. As the Council note there is limited experience as to how the delivery of net gains will work in practice and there is still significant uncertainty as to the potential cost of this to development.	Answer is noted. No changes needed.
Reading Friends of the Earth	No answer	Would favour a higher level than 10% - biodiversity is suffering.	No changes proposed. Although comments are appreciated, PPG guidance states that plan

			<p>makers should not seek a higher percentage than 10% unless justified.</p> <p>In addition, given the urban nature of the borough, a 20% increase be difficult to deliver on/offsite in practice and is likely to affect viability.</p>
Stantec OBO St Edwards Homes	Y	Yes, we agree that a 10% biodiversity net gain requirement is appropriate. Were a higher requirement to be considered by the Council, it would be important that it was demonstrated through robust evidence to be feasible and viable to deliver alongside other policy requirements on all development sites.	Answer is noted. No changes needed.
Savills OBO Viridis	No answer	See Para 185b of the NPPF. The LPPU should be consistent with the aims of national planning policy and should therefore reflect the provisions of NPPF paragraph 185b. Any proposed increase beyond the national guidance set out in the Environment Act 2021 (i.e.10%) would need to be fully justified by the Local Plan evidence base, taking into account the wider potential implications on development proposals coming forward which are likely to include site capacity and viability.	Answer is noted. No changes needed.
Stantec (OBO UoR)	Y	Yes. The University supports a policy which requires a 10% biodiversity net gain in accordance with the mandatory levels (10%) set out in the Environment Act 2021. It is considered that this level is appropriate for an urban authority such as Reading. Robust evidence would be required to justify the inclusion of any higher requirement.	Answer is noted. No changes required.
Stantec (OBO Aviva Life & Pensions Ltd)	Y	Additionally, our Client supports the Council's proposal to require the mandatory 10% biodiversity net gain (Policy EN12).	Answer is noted. No changes required.
Tricia Marcouse	Other	Not sure, Whilst 20% increase would be nice, that seems an unrealistic target for most development sites in the urban area. Is it possible to have a dual system so that development sites within ?? 200metres??? of land identified as higher biodiversity interest or on green corridors and green open space identified in the local plan or to be identified in the nature recovery strategy have a higher target than 10% Alternatively, could there be a policy to use section 106 or equivalent money for biodiversity enhancement in these areas?	<p>No changes proposed. Although comments are appreciated, PPG guidance states that plan makers should not seek a higher percentage than 10% unless justified.</p> <p>It is anticipated that S.106 agreements will be used to secure BNG where appropriate as per national requirements.</p>
Montagu Evans (OBO Abrdn)	No answer	The policy refers to some authorities seeking a higher percentage gain, however this can only be reasonably considered if there is a very strong evidence base that demonstrates a greater percentage gain is required. Given that there no evidence available in relation to a higher percentage gain requirement, the draft plan should remain within the national guidelines and targets. This will ensure that development is not overburdened with onerous biodiversity targets, and ensure that development continues to come forward at a suitable rate to meet the growing demands of Reading.	Answer is noted. No changes required.
Savills (OBO Sorbon Estates Ltd)	No answer	See Paragraph 185b of the NPPF. LPPU should be consistent with the aims of national planning policy and should therefore reflect the provisions of NPPF paragraph 185b. A gain beyond the statutory requirements is untested and could have significant implications on the viability of new development. Given current development needs and the lack of evidence, Policy EN12 should not go beyond requiring the 10% statutory requirement. Any proposed increase beyond the statutory requirement set out in the Environment Act 2021, which requires a 10% biodiversity net gain, should be fully justified by the LPPU evidence base, taking into account the wider potential implications for development proposals coming forward.	Answer is noted. No changes required.
BBOWT	No answer	We welcome the updated wording of Policy EN12 with the LA acknowledging the upcoming Mandatory 10% BNG for all large development sites. The Wildlife trust however does not agree with the level of biodiversity net gain being	No changes proposed. Although comments are appreciated, PPG guidance states that plan

		<p>sought and would strongly recommend the LA to adopt a stronger position on the matter and request 20% BNG where ever it can be justified.</p> <p>The draft BNG planning practice guidance published on 29/11/23 includes a section on how local authorities should deal with BNG in their local plans (see full response for link to guidance).</p> <p>The local need for a higher percentage is because The UK generally, with Reading Borough being no exception, has seen a decline in species and habitats. The decline of wildlife is due to many factors, but one significant factor is the destruction of habitats due to development. Over recent years Reading Borough has experienced significant housing and business development. The number of households in Reding is projected to grow to 68,621 by 2040 by 2040. Therefore with a greater number of homes and new large scale commercial developments such and the existing and already at risk habitats of Reading will come under greater pressure. Therefore a higher percentage of BNG may be needed to mitigate future developments and to make up for past declines in nature.</p> <p>Currently around 8% of England is designated a SSSI, but that figure is only around 4% for Berkshire. Berkshire is behind other parts of the country in terms of protected sites, but setting a higher BNG percentage could contribute towards narrowing the gap. 20% BNG would facilitate not only new habitats on site that bring people closer to nature, but also help with the creation of habitats away from developments where species that cannot cope with high levels of disturbance can thrive, such as skylark and other farmland birds.</p> <p>Evidence shows that requiring 20% BNG instead of the statutory 10% BNG does not impact on the financial viability of developments. The following are the Local Planning Authorities that have already adopted a 20% requirement or target. Guildford, Worthing, Greater Cambridge</p> <p>We are also aware of other local planning authorities working towards 20% or higher minimum biodiversity net gain requirements in emerging local plan policies: Richmond, Mid Sussex, Mole Valley, Birmingham, East Devon, Surrey Heath ,Canterbury, Swale, Swindon, Kingston-upon-Thames, Wiltshire</p> <p>Kent County Council commissioned a viability assessment¹ on the implications of 20% BNG. The assessment found that a shift from 10% to 20% BNG would not materially affect viability in the majority of instances. The additional cost to get from 10% BNG to 20% BNG was generally negligible. There should be enough evidence to provide the council will guidance as to how 20% BNG should be achieved therefore the Trust strongly recommends An increase to 20% as per the alternative options Paragraph 6.32.</p>	<p>makers should not seek a higher percentage than 10% unless justified.</p> <p>In addition, given the urban nature of the borough, a 20% increase be difficult to deliver on/offsite in practice and is likely to affect viability.</p>
<p>The Planning Bureau on behalf of McCarthy Stone</p>	<p>Y</p>	<p>Yes. We agree that the Council should seek 10% Biodiversity Net Gain and should not seek a higher amount.</p>	<p>Answer is noted. No changes required.</p>
<p>The Woodland Trust</p>	<p>Other</p>	<p>We would prefer the option to increase the on-site Biodiversity Net Gain requirement to 20%.</p> <p>We support setting a greater than 10% target for net gain where appropriate. By setting a more ambitious target, the Local Plan increases the chances that an average net gain of at least 10% will be delivered across the Plan area, given the possibility that some sites may not be able to deliver net gain within the Borough or that initiatives intended to deliver such gain may fall short in practice.</p>	<p>No changes proposed. Although comments are appreciated, PPG guidance states that plan makers should not seek a higher percentage than 10% unless justified.</p> <p>In addition, given the urban nature of the borough, a 20% increase be difficult to deliver on/offsite in practice and is likely to affect viability.</p>

Graham Bates	N	Minimum environmental standards inevitably prove to be lacking in the long term. RBC should go for the highest standards, always.	No changes proposed. Although comments are appreciated, PPG guidance states that plan makers should not seek a higher percentage than 10% unless justified. In addition, given the urban nature of the borough, a 20% increase be difficult to deliver on/offsite in practice and is likely to affect viability.
Environment Agency	No answer	Following a review of paragraphs 6.22 and 6.23, whilst a commitment to 10% biodiversity net gain is acceptable, as it has been highlighted, there a lot of local authorities and even statutory organisations such as the Environment Agency who are committing to 20% biodiversity net gain. We would therefore encourage the inclusion of a commitment to 20% biodiversity net gain and in that regard the policy could state there will be a commitment to 20% if possible, on each scheme.	No changes proposed. Although comments are appreciated, PPG guidance states that plan makers should not seek a higher percentage than 10% unless justified. In addition, given the urban nature of the borough, a 20% increase be difficult to deliver on/offsite in practice and is likely to affect viability.

Additional representations submitted via email regarding Biodiversity Net Gain targets

Respondent name	Comments	RBC Officer Response
Darcliffe Homes	There is no justification for RBC to seek a higher provision above the mandatory 10% BNG level. However RBC should be far more proactive in seeking to deliver an off-site BNG credit scheme within the borough. A scheme of biodiversity improvement on Council owned green spaces, similar to the approach by Wokingham Borough Council at Ashenbury Park in Woodley, would allow the whole borough and RBC to benefit both environmentally and financially from developers contributions towards off-site BNG credits. A win-win for everyone! There is an urgent and pressing need for more housing, and a significant limited availability of land. With all new developments now needing to deliver their statutory requirement of 10% BNG an off-site solution within the Borough is desperately needed and could be facilitated by RBC to benefit everyone.	Answer is noted. No changes proposed.

Q. 18 Do you agree with the proposed approach to off-site Biodiversity Net Gain provision? (This question relates to policy EN12)

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	All pristine green space & all recreational green space left within the borough should be protected & preserved. Development should be restricted to brown field.	See officer response to Q. 12.
Adam Boulding	N	we should protect the current biodiversity and areas more and not just "move them" we should not allow any development on land on the riversides where biodiversity and ecology exists today and if anything should protect it more and enhance it.	No changes proposed. Policy EN12 already deals with the protection of the existing Green Network and is being expanded to ensure that a 10% BNG is achieved for all new developments. Off-site provision is only preferable where on-site BNG cannot be achieved.
Henry Wright	N	All such gain should be delivered in Reading - whether through creation of new green spaces during development or reduction in roads or new verges	No changes proposed. The expectation will be that BNG is delivered on-site where possible.

			Where off-site provision is required, the metric favours provision closer to the development location. Only where this is not possible will provision be delivered outside the borough.
Mark Treder	Other	As above	See officer response to Q. 16.
Reading Climate Action Network	Y	Yes. I think it is currently too easy for developers to cause habitat loss etc and simply outsource the need to remedy this damage elsewhere through BNG funding. Your proposed changes would strengthen the system to some degree, and I like the idea of Biodiversity Opportunity Areas. However the potential for actual net gain is inevitably limited, especially given the issues with land ownership in, for example, the Kennet meadows area, which mean significant projects are difficult to get off the ground. We should not over estimate the potential, as this would allow too much habitat damage elsewhere.	Answer is noted. No change needed.
Louise Cole	Other	Please see comments, Q17 above.	See Officer response to Q. 17.
Natural England	No Answer	See response to Q. 17	See Officer response to Q. 17.
Louise Acreman	N	I think that a higher amount would benefit wildlife and in turn us.	Answer is noted however no changes are proposed due to reasons set out above.
Sport England	Other	within reason, community groups and charities may not be able to afford to carry out off site biodiversity off site Net Gains.	Answer is noted. No changes proposed. The policy must accord with national legislation, which does not allow for such exemptions or vary depending on the applicant.
HBF	N	No. When delivering BNG developers are required to follow the mitigation hierarchy which emphasises that onsite biodiversity gains should be considered first followed by registered offsite biodiversity gains and – as a last resort – biodiversity credits. This hierarchy is reinforced through the biodiversity metric which requires a developer to deliver more mitigation if it is delivered outside of the local area. As such it is already in the interest of the developer to deliver net gains within the local area. However, it must be recognised by the that this may not be possible and that it is unreasonable to place a 10km buffer as to where mitigation can be provided. It is clearly the Government's intention, as indicated by the availability of statutory credits, that where mitigation cannot be delivered on site or locally then there is scope for credits to be purchased that provides suitable mitigation anywhere in the Country. As such the proposal to limit mitigation to with 10km of Reading is inconsistent with national policy and is unsound.	Answer is noted. Changes agreed. Policy will not include reference to the 10 km geographical limit for offsite gains outside the Borough boundary. However, it will still direct off-site provision towards areas within the borough where practicable and identified within the Council's Natural Environment SPD, The Berkshire Local Nature Recovery Strategies or Biodiversity Opportunity Areas.
Reading Friends of the Earth	Other	Not entirely. It is useful to improve biodiversity anywhere/everywhere – in part to give people access to wildlife and nature in their daily lives. Note that Local Nature Recovery Strategies may well be in place before this Local Plan Update is completed.	Answer is noted. Policy will not include reference to the 10 km geographical limit for offsite gains outside the Borough boundary. However, it will still direct off-site provision towards areas within the borough where practicable and identified within the Council's Natural Environment SPD, The Berkshire Local Nature Recovery Strategies or Biodiversity Opportunity Areas.
Savills OBO Viridis	No answer	The Policy needs to be flexible and recognise that, particularly in the case of many brownfield redevelopment sites such as in the Central Area, the mandatory 10% BNG may not deliverable on-site and thus needs to align with the BNG hierarchy set out in Article 30A of the Development Management Procedure Order. The LPPU recognises that some off-site BNG will need to be delivered outside the Borough's boundaries. It suggests a 10km buffer; however, it is not clear on what basis this buffer has been measured and the extent of neighbouring authority boundaries extend much further than 10km. We do not agree that an off-site buffer should be defined; rather the policy should be flexible to review off-site opportunities and credits on a case-by-case basis. A prescribed buffer would not align with the statutory provisions in	Changes partially agreed. Policy updates will align with Biodiversity Gain Hierarchy and national legislation. Policy will not include reference to the 10 km geographical limit for offsite gains outside the Borough boundary. However, it will still direct off-site provision towards areas within the borough where practicable and identified within the

		the Environment Act 2021 or the current draft guidance in the BNG section of the PPG, where the weighting of off-site provision is accounted for in the DEFRA metric.	Council's Natural Environment SPD, The Berkshire Local Nature Recovery Strategies or Biodiversity Opportunity Areas.
Stantec (OBO UoR)	No answer	The University acknowledges that clear guidance is required for the provision of off-site delivery of biodiversity net gain where on-site delivery is not possible. It is clear that not all sites within Reading will be able to deliver on-site biodiversity net gain and so the Council must ensure it has a clear strategy and robust guidance for developers on this matter.	Answer is noted. No changes proposed.
Tricia Marcouse	Other	Yes, but is it worth mentioning that there are credits available from the Sulham Estate already so that it is clear that things can be done very near the council boundary	No changes proposed. Policy will direct off-site provision towards areas within the borough and within close proximity to the application site where practicable, but does not seek to specify specific locations outside the Borough within the policy itself.
Savills (OBO Sorbon Estates Ltd)	No answer	<p>The Policy needs to be flexible and recognise that the mandatory 10% BNG as set out above, may not be able to be delivered on-site and needs to align with the BNG hierarchy set out in Article 30A of the Development Management Procedure Order.</p> <p>The LPPU recognises that some off-site BNG will need to be delivered outside the Borough's boundaries. It suggests a 10km buffer; however, it is not clear on what basis this buffer has been measured, particularly when the extent of neighbouring authority boundaries extends much further than 10km.</p> <p>It is considered that a specific off-site buffer should not be defined and the policy should be flexible to review off-site opportunities and credits on a case-by-case basis. Any limit to where credits could be secured could prevent or result in substantial delays to new development coming forward. A prescribed buffer does not align with the statutory provisions in the Environment Act 2021 or the current draft guidance in the BNG section of the PPG, where the weighting of off-site provision is accounted for in the DEFRA metric.</p>	<p>Policy updates will align with Biodiversity Gain Hierarchy and national legislation.</p> <p>Changes partially agreed. Policy will not include reference to the 10 km geographical limit for offsite gains outside the Borough boundary. However, it will still direct off-site provision towards areas within the borough where practicable and identified within the Council's Natural Environment SPD, The Berkshire Local Nature Recovery Strategies or Biodiversity Opportunity Areas.</p>
BBOWT	Y	<p>We welcome Reading Borough Councils position of BNG and agree that delivering the mandatory Net Gains for all developments would be logistically very difficult given the lack of open space and urban nature. BBOWT would be more than willing to work with the Borough in identifying suitable offsite opportunities to deliver mitigation and ensure that at least the mandatory net gain for any given development is achieved. We would also support the 10km buffer as it would mean that the off site net gain achieved would still benefit the local area i.e. Berkshire. THE trust would also deem it not unreasonable if off site net gain were needed to be achieved beyond the 10km buffer providing that it is Ecologically and strategically justified and would still benefit Berkshire and or possibly Oxfordshire.</p> <p>We welcome the inclusion within the policy for irreplaceable habitats to be protected alongside formal designations and even though it is not covered by the Metric it states in the [see NPPF Paragraph 180]</p> <p>We would support the Reading Borough Councils on the following points:</p> <ul style="list-style-type: none"> • That reference be added to avoiding light spillage over rivers; • That new landscaping next to rivers should be native and wildlife friendly; and • That renaturalisation of the riverbanks should be required for relevant applications. 	Answer is noted. No changes required.
The Planning Bureau on behalf of McCarthy Stone	N	The Council should note that since the publication of the consultation, the government have published a draft PPG regarding biodiversity net gain. In light of the new guidance on BNG, the Council will need to review this policy to ensure it fully reflects all the new legislation, national policy and guidance.	Answer is noted. No changes required.
Environment Agency	No answer	The policy to deliver off-site biodiversity net gain seems reasonable however on-site biodiversity net gain provision is preferable, both in terms of achieving biodiversity net gain and in terms of developments being directly more	Answer is noted. No changes required.

		biodiverse and therefore we would encourage this. We welcome the use of Biodiversity Opportunity Areas to help identify areas where there are opportunities for biodiversity improvement. We advise that the Environment Agency and other stakeholders of interest should be involved in helping to make sure that all opportunities are sought, and schemes are designed which will be the most beneficial.	
--	--	--	--

Q. 19 Do you have any other comments on how Biodiversity Net Gain is to be addressed? (This question relates to policy EN12)

Respondent name	Y/N/ Other	Comments	RBC Officer Response
James Ford	N/A	All pristine green space & all recreational green space left within the borough should be protected & preserved. Development should be restricted to brown field.	See officer response to Q. 12.
Adam Boulding	N/A	enhance more smaller spaces in the town, not just major projects. for example allow the communities to suggest land that could be enhanced, and allow local businesses, workplaces and communities to volunteer to work with the council to enhance the areas (with the councils guidance and approval) to build more smaller biodiversity hot spots and sanctuaries and gain better ownership from the local community of this	Answer is noted, however, no changes proposed. BNG requirements does not preclude gains coming forward on smaller sites unless exempt. The mobilisation of groups to build 'hot spots' is beyond the scope of planning.
Christian Harris	N/A	No flats houses with gardens	Do not agree, no changes proposed. Due to the urban nature of the borough, high-density development (including flats without a dedicated private outdoor space or with small gardens) is often required to suit the needs of the residents, as well as family housing to meet housing targets.
Willshire Swifts	N/A	Section 6 is labelled as Built and Natural Environment but does not address the issue of wildlife in the Built Environment. The Built Environment is an important habitat in its own right and should be addressed within the LP. Many species, for example cavity nesting birds such as the swift, house sparrow (both red-listed) rely on the built environment to nest. Many Local Plans now refer to BS42021: 2022 as this British Standard is recognised as best practice and ensures the onus is on developers without expense to the local authority. Current BNG calculations do not take bird provision into account. It is also important to encourage other species using bat and bees bricks, hedgehog highways, reptile refugia and hibernacula, all increase the wildlife and biodiversity of a newly built environment.	Answer is noted. Change partially agreed. Policy EN12 will be amended to set out that wildlife friendly design must be incorporated within new developments, including, for example, the provision of bird nesting and bat roosting opportunities within new buildings (such as universal swift bricks and bat bricks or tiles). Where applicable, conditions can be added to a decision notice that requires the provision of ecological enhancements such as swift bricks to address this matter.
Reading Climate Action Network	N/A	I think it is difficult to be certain in many cases that the assumed net gain actually materialises, especially given the fact that the original damage is done very quickly, but the remediation – often elsewhere – can take many years. There should be a strong presumption against causing habitat loss in the first place. Developers should be required to report on BNG until the required gain has been achieved, rather than being able to outsource the work and walk away.	No changes proposed. Policy has been written in accordance with the Biodiversity Gain Hierarchy. Management of biodiversity units for a minimum of 30 years is legally required.
Louise Cole	N/A	Please see comments, Q17 above.	See Officer response to Q. 17
Natural England	N/A	See response to Q. 17	See Officer response to Q. 17
Sport England	N/A	there needs to be exceptions to this to allow for affordability and the status of the applicants, as wells to ensure there is no conflict with national policy.	No changes proposed. The Policy will be updated to ensure it accords with national guidance and legislation, which has no exemptions for BNG due to affordability or status of applicants. If this is incorporated then it will conflict with national legislation.

Jean H Rainey	N/A	Don't build on sites which already have a good amount of wildlife or biodiversity potential!!	No changes proposed. See policy EN12.
Reading Friends of the Earth	N/A	Important to get sound baseline data for sites proposed for development – before demolition starts! Council should prepare detailed, prioritised local guidance with a list of favoured actions.	No changes needed. As a validation requirement, the pre-development biodiversity value must be submitted with the planning application.
Historic England	N/A	The natural environment and historic environment are integral to one another. Newly created or altered habitats will sit within a historical landscape and may have both positive and negative impacts on setting as well as physical and chemical conditions of heritage assets.	Change proposed.
Stantec (OBO UoR)	N/A	The University supports the updating of the policy to reflect current guidance and legislation. This should reflect the provisions of the Environment Act 2021 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024.	Answer is noted. No changes required.
Tricia Marcouse	N/A	The Climate Action Plan policy agreed in 2020 asks for the council to prepare a list, with costs, of potential sites for external BNG that would provide a benchmark for developers. I think this requirement should be included in the policy, and not just a “have a look in these areas” option.	No changes proposed. The policy requires off-site gain to be directed towards areas within the borough and identified within The Council's Natural Environment SPD, The Berkshire Local Nature Recovery Strategies or Biodiversity Opportunity areas.
The Planning Bureau on behalf of McCarthy Stone	N/A	In light of the new draft PPG guidance on BNG, the Council will need to review this policy to ensure it fully reflects all the new legislation, national policy and guidance.	Answer is noted and agreed. No changes required.
The Woodland Trust	N/A	Strongly support strengthening the wording to ensure protection for irreplaceable habitats, including ancient woodland and ancient & veteran trees.	Answer is noted. No changes required.
M Langshaw	N/A	Negotiation with adjacent Unitary Authorities seems necessary	Answer is noted.
Graham Bates	N/A	As above Q17.	See officer response to comments under Q.17.
Environment Agency	N/A	See answer to Q. 18	See Officer response to Q. 18

Additional representations submitted via email regarding Biodiversity and the Green Network

Respondent name	Comments	RBC Officer Response
Berkshire Gardens Trust	We welcome the changes to Biodiversity Net Gain provision. However, it is important that in considering provision within either a registered historic park of garden or locally important historic park or garden that the historic significance of the site is recognised and the effect of the introduction of new proposed landscape features respects that historic design and significance.	No changes needed. Decision makers will still consider wider matters where relevant in relation to the proposed type and location of enhancements, such as heritage.
The Woodland Trust	We would also welcome the opportunity to contribute to the forthcoming Biodiversity and Natural Environment SPD in due course.	Noted. No change needed.

Q. 20 Do you agree with the proposed additions to policy EN12 as a result of the Biodiversity Action Plan?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
James Ford	Other	All pristine green space & all recreational green space left within the borough should be protected & preserved. Development should be restricted to brown field.	See officer response to Q. 12.

Henry Wright	Other	Yes except for 6.29 - if development is next to the river bank it should be able to include improvements to the footpath or riverside to increase accessibility or make it a larger space. It needn't always be returned to its previous state (this may be low quality environment)	No changes needed. Development within the vicinity of a watercourse and associated improvements is dealt with under policy EN11.
Mark Treder	Other	As above	See officer response to Q. 18.
Wiltshire Swifts	N	See answer to Q. 19	See Officer response to Q. 19.
Reading Climate Action Network	Y	Yes I think this is very important.	Noted. No change needed.
Paul Oliver James Melville	Other	see above	See officer response to Q. 19.
Louise Cole	Other	There needs to a wider approach to increasing biodiversity apart from simply adhering to the BNG assessment, for the reasons given in Q17	See Officer response to Q. 17.
CADRA	Y	Yes. In addition, 6.25 should add a requirement not to create overshadowing of a watercourse which can create significant negative impacts on biodiversity. This is an issue on which the Environment Agency has previously commented in relation to the development on the SSE site. <i>"The usual rule of thumb would be to have the building set back from the bank top the same distance as the height of the building to prevent shading of the river and river bank."</i>	No changes proposed. Policy EN11 already includes a requirement for development to be set back at least 10 metres from watercourses to protect its biodiversity significance.
Natural England	Y	Agree	Answer is noted.
Reading Friends of the Earth	Y	Yes but need to integrate with existing and potential wildlife corridors outside Reading boundaries.	Noted. The policy makes explicit reference to Berkshire-wide Local Nature Recovery Strategies.
Savills (OBO Sorbon Estates Ltd)	No answer	The LPPU seeks amongst other matters to, 'Ensure that, as a minimum, new development does not increase light spillage over rivers'. This seems an unnecessary addition to Policy EN12, given requirements for development in the vicinity of a watercourse are already dealt with under Policy EN11 (which is currently not proposed to be updated). The NPPF (2023) (paragraph 16) is clear that plans should serve a clear purpose and avoid unnecessary duplication of policies. On this basis, for clarity and avoidance of repetition, matters pertaining to the watercourse should be referred to in Policy EN11 and not as part of Policy EN12.	No changes proposed. Policy EN11 is not subject to the LPPU and relates primarily to land uses within the vicinity of watercourses. However, Policy EN12 provides specific points on biodiversity, and this insertion addresses concerns that the impact that light pollution can have on biodiversity.
Swifts Local Network: Swifts & Planning Group	Other	See answer to Q. 12	See Officer response to Q. 12
The Woodland Trust	Y	Yes, in particular supporting encouragement of native species in landscaping schemes, important for biodiversity and biosecurity. Specifying native species from UK sourced & grown tree stock will help address threats of pests & disease and help boost resilience and biosecurity as well as supporting the domestic "green economy" and reducing the carbon footprint of the supply chain. As noted above, we prefer the option to increase the on-site Biodiversity Net Gain requirement to 20%	No changes proposed. PPG guidance states that plan makers should not seek a higher percentage than 10% unless justified. In addition, given the urban nature of the borough, a 20% increase be difficult to deliver on/offsite in practice and is likely to affect viability.
Graham Bates	Other	Increase the on-site Biodiversity Net Gain requirement to 20%. Over time this will be seen as minimal. Also, ignoring small developments risks a collective mass of damage in the long term.	No changes proposed. PPG guidance states that plan makers should not seek a higher percentage than 10% unless justified.

			<p>In addition, given the urban nature of the borough, a 20% increase be difficult to deliver on/offsite in practice and is likely to affect viability.</p> <p>All development sites are required to comply with mandatory BNG, unless they are exempt (which is beyond the control of RBC and outlined in National Policy).</p>
Environment Agency	No answer	<p>Following a review of paragraph 6.27, the Environment Agency would like to be consulted on these actions before they are implemented. Wildlife corridors are very important to biodiversity, particularly in urban areas. These could also contribute to the bank of offsite biodiversity net gain areas if possible. These actions could include N10 (as in the Climate Emergency Strategy), as it is important to have a baseline of the likely requirements for habitat compensation and biodiversity net gain and know where the funding for these schemes could possibly come from. If these are going to be used for potential offsite biodiversity net gain, then finding out the baseline of everywhere at the beginning will save time and money compared to doing it on a site-by-site basis.</p> <p>As highlighted in paragraph 6.28, we support the production of a Biodiversity and Natural Environment SPD and advice that it is included in the policy.</p> <p>In section 6.29 the First bullet point one state 'Assess planning applications in terms of their impact on soils'. Soils are very important ecosystems which support all plants and therefore need to be protected but that might mean there is a new resource of soil experts, or new training in place.</p> <p>The second bullet point state, 'Ensure that, as a minimum, new development does not increase light spillage over rivers'. This is important for bats and other wildlife which live in the river and its corridor, as the too much light can affect animals' circadian rhythms.</p> <p>The third bullet point state, 'To ensure that any new landscaping adjacent to watercourses is predominantly native and wildlife friendly'. We advise that the LPA take out 'predominantly' and replace it with 'all' to make the wording stronger because native species are very important to promote ecosystem recovery.</p> <p>The fourth bullet point state, 'To require the re-naturalisation of the river bank when new development is adjacent to it'. This is very important and should be encouraged wherever this is a possibility. The LPA should engage/liaise with Environment Agency for advice on this.</p> <p>It would be important to include all the elements listed in paragraph 6.29 in the policy.</p>	<p>Change proposed to remove the word "predominantly".</p> <p>Change proposed to include all elements listed in paragraph 6.29 within the policy itself.</p>

Additional representations submitted via email regarding policy EN12

Respondent name	Comments	RBC Officer Response
Earley Town Council	ETC notes the comments related to Wildlife Corridors and Green Networks and requests that early engagement with adjacent Towns and Parishes is undertaken, so a fully integrated approach can be developed.	Answer is noted. No changes required.

Q. 21 Do you agree that, in the event of land in Reading being identified for inclusion within the Chilterns AONB, we should update policy EN13 as described? Are there other changes that are required?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	All pristine green space & all recreational green space left within the borough should be protected & preserved. Development should be restricted to brown field.	See officer response to Q. 12.
Mark Treder	Other	As above	See officer response to Q. 18.
Paul Oliver James Melville	Other	see above	See officer response to Q. 19.
CADRA	No Answer	CADRA supports the change.	Answer is noted. No changes required.
Natural England	No answer	Name change of AONB to National Landscapes needing updating. Change is necessary to reflect the possible boundary changes. Natural England would prefer the removal of 'where possible', to be in line with paragraph 182 of the NPPF which states that ' <i>Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues</i> '	Agree. Changes proposed. Policy will be amended to refer to National Landscapes and wording will be brought in line with NPPF Paragraph 182.
Louise Acreman	Y	Yes definitely, we should include areas of north Reading in Chilterns AINB	Answer is noted. No change required.
FCCG	No Answer	Any development must conserve and must also enhance the character and beauty of the AONB	No changes proposed. Wording is to be brought in line with NPPF paragraph 182.
Savills (OBO Sorbon Estates Ltd)	No Answer	Whilst it is noted that it is not proposed to update Policy EN13 in the context of the defined Major Landscape Features, the policy needs to maintain flexibility in its wording for development adjacent to these spaces and highlight support for developments that take the opportunity to connect to these features appropriately. Site SOU1 – Reading Link Retail Park is located immediately north-east and adjacent to part of the Major Landscape feature, 'Holy Brook Meadows'. Indeed, as set out in the supporting documentation, part of the adjacent meadow remains within the legal demise and control of Sorbon Estates. It is envisaged that the proposed residential development of Reading Link will provide a significant opportunity to connect to and open up access to the meadow for the public, and connect to the Public Right of Way (PRoW) network located beyond to the west. This would provide valuable opportunities for recreation, open space and amenities for future residents and the local community, as well as potential enhancements to biodiversity and wildlife habitats.	No changes proposed. The wording in relation to Major Landscape Features is not proposed to be updated. Supporting text 4.2.65 does not preclude development within proximity to Major Landscape Features, but states that it should maintain and enhance the natural beauty and visual amenity of such features. Comments are noted regarding Site SOU1.
M Langshaw	Y	Some at least of Reading being included within the Chilterns AONB sounds good.	Answer is noted.
Graham Bates	Y	As stated, ignoring small developments risks a collective mass of damage in the long term.	No changes required. It is unclear what is meant here. The proposed change would account for all development (including small sites) to conserve and enhance National Landscapes.

Q. 22 Do you agree that we should update policy EN14 as described to take account of the tree strategy and other matters?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Y	Yes All pristine green space & all recreational green space left within the borough should be protected & preserved. Development should be restricted to brown field.	See officer response to Q. 12.
Adam Boulding	Y	No comments	Answer is noted.

Christian Harris	Other	Remove tree polices where they are in conflict	No change proposed. Trees help define the landscape and character of the Borough and provide multiple benefits to the urban environment, e.g., adapting to climate change. Therefore removing the policies where they are in conflict would deviate from Local Plan objectives and result in inconsistency in its application.
Mark Treder	Other	As above	See officer response to Q. 18.
Reading Climate Action Network	Other	<p>Yes but this does not go far enough. The tree strategy is excellent as far as it goes but does not adequately address the urgent need to preserve existing canopy cover. Currently permission to fell mature trees is only required where that tree has a TPO, and there have been numerous examples recently of mature trees without TPOs being felled for the convenience of developers or landowners. Furthermore, RBC monitoring of net changes in tree cover – new plantings minus fellings – only appears to include fellings which have been allowed as part of a planning permission. The objectives of the tree strategy can't be met if existing mature trees are replaced with new plantings as these can take many decades to provide equivalent benefits.</p> <p>I understand it would not be practicable to apply TPOs to every tree in the borough, but would it not be possible to include a general requirement for permission to be required to fell any mature tree? This would require additional resource to assess applications, but use could be made of the excellent network of tree wardens who are very keen to ensure trees are retained wherever possible. Permission would not be unreasonably withheld where good reasons are provided, but the requirement for permission would act as a deterrent in many cases and would also enable the council to more accurately monitor changes in tree cover across the borough.</p>	<p>Comments are noted, however, no changes are proposed. Protection Under the Town & Country Planning Act 1990, The Town and Country Planning (Tree Preservation)(England) Regulations 2012 and The Forestry Act 1967 is the only way RBC can formally prevent felling without due process being followed. Local Plan Policy is aimed at providing a framework which planning applications will be assessed against. However, policies cannot require approval to be required for tree felling that falls outside that under which the aforementioned legislation would be applicable. Furthermore, introducing such a requirement could not be administrated due to insufficient resources within the Council.</p> <p>Felling is not something that can be feasibly policed, hence reporting on net gain is largely restricted to developments and Council felling/planting. New trees on development sites are largely of smaller canopy trees due to reduced space available post-development. EN14 and the Tree Strategy both promote large canopy tree planting, which is required wherever space allows.</p>
Paul Oliver James Melville	Y	more trees on streets and roads please.	No changes needed. This is already being addressed through the proposed updates e.g. greater emphasis for tree planting on treed corridors (including roads, railways, rivers, and Green Links), and will also make clear reference to the headline ambitions of the Tree Strategy.
Nicholas Gumble	N	I support the alternative to have a minimum canopy cover. The justification of that some plots have high coverage doesn't seem to impede that as surely the development could just use less of the plot? Suitable outside space is valuable and doesn't need to be 2nd place to maximising every inch of a plot.	No changes proposed. Introducing minimum canopy cover requirements on individual development sites could bring challenges in meeting the minimum density requirements and making effective use of land within a geographically constrained borough.

			<p>For new developments, large canopy tree planting is required wherever space allows. Proposed changes to EN14 detail the instances where tree canopy will be prioritised and required.</p> <p>In addition, all development will be required to ensure a 10% biodiversity net gain in accordance with the Biodiversity Gain Hierarchy. Ensuring adequate private/communal space requirements is dealt with under policy H10.</p>
Anthony Acka'a	Y	<p>Canopy cover is important for reducing temperatures when it is very hot.</p> <p>More trees will improve the town's landscape, biodiversity and help towards Reading's net zero target</p>	Answer is noted.
CADRA	No Answer	CADRA supports the change.	Answer is noted. No change needed.
Natural England	Y	Supportive of the Tree Strategy March 2021 and it's aspirations to increase tree canopy cover, which is one of the GI Framework headline standards, so agree the strategy should be given greater weight in this policy. The importance of the retention of existing trees should also be highlighted as newly planted trees take many years to provide the same environmental benefits. The Urban Greening Factor can help to encourage the retention of on site trees.	<p>Answer is noted, however, no changes are proposed. It is not clear what additional outcomes this would bring. For example, the proposed policy updates within the LPPU require development proposals to align with BNG. The BNG Hierarchy, as a starting point, requires the avoidance of adverse effects of the development on onsite habitat (such as existing trees) before moving onto mitigation and onsite enhancement (i.e. felling/planting).</p> <p>See response to Q. 12 regarding the Urban Greening Factor.</p>
Louise Acreman	Y	Trees are so beneficial, the minimum tree cover of 25% should be incorporated. I don't think the alternative options go far enough.	Answer is noted. No change needed.
FCCG	No Answer	This policy needs updating. Tree planting objectives should be even more ambitious.	No changes proposed. Comment does not suggest how a more ambitious target could be achieved. A target of 25% reflects the amount of land that is likely to be suitable and potentially achievable for extended cover, and would represent a substantial 39% increase in canopy cover over existing levels.
Damians Bramanis	Y	I also believe that introducing a minimum canopy cover is appropriate, with different targets for different types of sites. The current level of tree planting in new build developments is far below the level I would expect in a modern development, and I believe the bias towards density over nature is destroying the beauty of Reading. Setting a target for canopy cover is the right thing to do for the community, rather than leaving that decision to property developers (who may choose to target profit rather than community benefit).	No changes proposed. Introducing minimum canopy cover requirements on individual development sites could bring challenges for specific sites. It is acknowledged that new trees on development sites are often of smaller canopies due to reduced space post-development. However, large canopy tree planting is required wherever space allows. Proposed changes to EN14 detail the instances

			<p>where tree canopy will be prioritised and required.</p> <p>In addition, all development is required to ensure a 10% biodiversity net gain as of April 2024 in accordance with the Biodiversity Gain Hierarchy.</p>
Stantec OBO St Edwards Homes	Other	We support the Council in seeking to achieve increased canopy cover in the Borough, however it will be important that Policy EN14 does not unnecessarily inhibit development. As such, it is necessary that policy wording is pragmatic, based on a realistic understanding of what can feasibly be delivered by development and recognising that there will be some circumstances where the provision of large canopy trees may be unachievable, for example on small, high-density developments.	Do not agree, no changes proposed. Canopy cover is a borough-wide ambition rather than an on-site requirement. A target of 25% was thoughtfully selected based on the amount of land that is likely to be suitable and potentially achievable for extended cover.
Historic England	No answer	<p>While we support tree planting, there is potential for planting to harm the integrity and/or significance of heritage assets if planted without due consideration to the historic environment. For example, within an archaeological notification area, care will be needed to understand the potential for harm to archaeological remains and avoid or minimise such harm.</p> <p>We welcome the Tree Strategy stating that: “The aim to improve diversity should not compromise the integrity of heritage assets such as historic parks and gardens or conservation areas”.</p>	Agreed, change proposed. Policy has been amended to state that the historic environment should be considered when tree planting as appropriate, and any potential harm to heritage assets should be avoided.
Savills OBO Viridis	No answer	It is not considered appropriate for the Policy to prescribe that developments meet a specific canopy coverage, given the predominately urban nature of the borough and the need to take into account local characteristics and individual site-specific circumstances. Whilst the desire to increase canopy cover is acknowledged, it is important that this is balanced against increasing local development needs and the aim to optimise brownfield sites. Similarly, it is also proposed that the update to the Policy reflects the NPPF, in seeking to create tree-lined streets; however some flexibility is needed to take account of site-specific circumstances and in order that the policy complies with footnote 53 (paragraph 136) of the NPPF.	Do not agree, no changes proposed. The preferred approach does not explicitly require individual developments to meet a specific canopy coverage. A target of 25% is borough-wide and was selected based on the amount of land that is likely to be suitable and potentially achievable for extended cover.
Stantec (OBO UoR)	Other	The University is supportive of the retention of existing trees, hedges and woodlands, and in principle the updating of this policy in line with the Reading Borough Council Tree Strategy and NPPF. The policy should make it clear that new development should make provision for tree planting where appropriate and justified as planting may not be appropriate or feasible on all development sites. Should any requirement for increasing canopy cover and the inclusion of large canopy species be added, the policy should include clear thresholds and exemptions for this requirement and ensure it is acknowledged that there will be some instances where this may be unachievable.	No change proposed. The policy statement is worded such that all development will make provision for tree planting, to achieve the important aims already set out. This change would water down the policy approach.
Tricia Marcouse	No answer	Yes, but if this plan is to be until 2041, then there needs to be some interim targets for actually measuring the canopy coverage and checking progress. 5-yearly???	No change needed. Objective 12 within the Tree Strategy Action Plan sets out how progress of tree gain will be monitored on an ongoing annual basis.
Montagu Evans (OBO Abrdn)	No answer	25% canopy cover is an extremely high target that is unrealistic for a local authority which is characterised by urban development, even in large parks 12% canopy cover is challenging to achieve. The new regulations requiring a 10% biodiversity net gain provide a robust framework to increase biodiversity and urban greening, and these should be relied upon rather than imposing an arbitrary metric in relation to canopy cover. This is particularly important where Reading is forecasting a shortfall in housing supply, and a canopy cover policy would significantly constrain many sites (including allocations) within Reading. The BNG framework allows for a more flexible approach to achieving the same objectives in relation to a green environment in Reading.	<p>Do not agree, no changes proposed. The preferred approach does not explicitly require individual developments to meet a specific canopy coverage. A target of 25% is borough-wide and was selected based on the amount of land that is likely to be suitable and potentially achievable for extended cover.</p> <p>Policy will be cross referenced to ensure that aligns with other priorities such as BNG.</p>

Savills (OBO Sorbon Estates Ltd)	No answer	<p>It is considered that the Policy should not prescribe developments to meet a specific canopy coverage, given the predominately urban nature of the borough and the need to take into account local characteristics and individual site-specific circumstances. Whilst the desire to increase canopy cover is acknowledged, this must be balanced against increasing local development needs and the aim to optimise brownfield sites. This would not be appropriate as the potential for planting on higher density previously developed sites where making an efficient of land should be priorities, would likely be more limited.</p> <p>It is also not clear what the relationship is between the size of the canopy and tree quality. Large tree canopies may not necessarily result in high-quality tree planting or landscaping.</p> <p>It is also proposed that the update to the Policy reflects the NPPF, in seeking to create tree-lined streets. Although it will be important to ensure consistency, the updates in this context ensure flexibility, aligning with Paragraph 136, footnote 53 of the NPPF; to ensure site-specific circumstances can be taken into account, as this will not always be an appropriate approach.</p>	<p>Comments are noted. Partially agreed. Policy will be updated to refer to contents of NPPF footnote 53 in relation to the creation of tree-lined streets.</p> <p>The preferred approach does not prescribe development sites to meet a specific canopy coverage. A target of 25% is borough-wide and was selected based on the amount of land that is likely to be suitable and potentially achievable for extended cover.</p> <p>Large canopy species planting is prioritised wherever possible to ensure that new trees provide the maximum role in mitigating the effects of climate change. The policy and tree strategy require high quality tree planting and tree/landscaping quality, and will also be considered at the planning application stage.</p>
The Planning Bureau on behalf of McCarthy Stone	N	<p>Requiring a 25% tree canopy cover, especially for small brownfield sites is not deliverable or realistic and could compromise sustainability development and is therefore contrary to NPPF (paras 16 and 136). Any requirement would also need to be fully evidenced and the requirement incorporated into the viability study.</p>	<p>No change proposed. The preferred approach does not explicitly require individual developments to meet a specific canopy coverage. A target of 25% is borough-wide and was selected based on the amount of land that is likely to be suitable and potentially achievable for extended cover.</p>
The Woodland Trust	Other	<p>We strongly support incorporating the (excellent) Tree Strategy into the local plan, in particular the target that canopy cover be increased to 25% by 2030, and that no ward should have a canopy cover below 12%.</p> <p>However we would also support having a baseline canopy cover target for development sites. Informed by the ward canopy cover and the UK Tree Equity Score, such a target could be a valuable tool to drive action and monitor progress, without which the Tree Strategy target risks remaining aspirational.</p> <p>We recommend setting a minimum of 30% tree canopy cover target for all new housing developments, with retrofitting areas with a tree canopy cover below the UK average as a policy priority.</p>	<p>No changes proposed. This would not be appropriate as sites are extremely varied in their potential for planting and would be difficult to achieve. BNG requirements will still apply on a site-by-site basis.</p>

Additional representations submitted via email regarding policy EN14/Trees in general

Respondent name	Comments	RBC Officer Response
Berkshire Gardens Trust	<p>We support the changes to EN14. However, we would like to see reference to the importance of trees in registered historic parks of gardens or locally important historic parks or gardens. As well as individual trees, the style of planting is often of historic significance. For example, the historic form of key avenues of trees could be undermined by nearby random tree planting.</p>	<p>No changes proposed. These matters are sufficiently addressed through heritage policies within the Local Plan.</p>
Aubrey Blazey	<p>As we saw with the pandemic people in built up areas still need green space - you mention "preserving" as much as possible - but not much about purchasing any spaces and turning them green. Creating boulevards with trees down the center would help reduce heat islands and also make Reading a more pleasant place.</p>	<p>No changes proposed as LPPU updates include greater emphasis on creating treed corridors and tree-lined streets. Existing policy wording</p>

		requires new development to make provision for tree retention and planting.
--	--	---

Additional representations submitted via the questionnaire regarding the natural environment

Respondent name	Comments	RBC Officer Response
Louise Acreman	As a resident I just want to live somewhere where the air is clean, we have parks and trees and people are healthy.	Answer is noted, no changes proposed. Local Plan objectives are aligned with these comments.

Chapter 7: Employment

Q. 23 Do you agree that we should update the employment policies listed? (EM1 and EM2)

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Mark Treder	Other	No point creating a plan if you cannot stick to it	No change needed. The intention is that decisions are made in line with the plan unless material considerations indicate otherwise, in line with the law.
Paul Oliver James Melville	N	they are adequate.	Comment is noted, no change needed.
Montagu Evans (OBO Vintage Capital (No.3))	Y	<p>Yes, we do agree that the Council should update its employment policies in the new Local Plan. The Framework is clear that Local Plans should be up to date and provide a framework for meeting housing needs and addressing economic priorities. The key evidence base used to underpin the 2019 Local Plan was the Central Berkshire Economic Development Needs Assessment (EDNA) which was prepared in 2016.</p> <p>Since adoption of the Plan the Council identifies that there has actually been a net reduction of 74,000sqm2 of offices. In June 2023 LSH published research on the office market in the Thames Valley and South East, which identified that vacant office space has increased year on year since 2020 and there is currently 2.5 million sq ft of vacant office space in Reading. Clearly the employment policies in the adopted Local Plan and its associated evidence base are substantially out of date and must be updated. The EDNA pre-dated Covid and the well reported shift to home working for example. This is important so that the draft Plan can be found justified, which is an important soundness matter.</p> <p>We agree with the Council's proposal to update Policy EM1 and Policy EM2. However, we do not agree with the suggestion that Policy EM3 (Loss of employment land) will not be updated.</p> <p>The Council has explained that it has not yet produced an updated EDNA so it is unclear on what basis the Council can conclude Policy EM3 does not need to be amended. The policy protects existing employment land and provides a criteria based assessment to applications that propose the loss of employment land outside of Core Employment Areas, including Reading Bridge House. This includes consideration of the viability of the employment use (requiring marketing evidence), whether a surplus of accommodation exists and if the need for alternative uses is stronger than the need for the retention of employment land.</p>	<p>Answer is noted. The Commercial Development Needs Assessment provides up to date evidence on latest needs as set out in the LPPU.</p> <p>It is not policy EM3 that is directly linked to the results of the CDNA, but rather policy EM2, because it is that policy that determines which land is vital to retain in employment use. The criteria in policy EM3 will be applicable to the areas not covered by Core Employment Area designation whatever the results of the CDNA. It is not clear why the criteria in EM3 would no longer be appropriate, particularly bearing in mind that they are not a checklist that must be fulfilled but rather a set of considerations to reach a balanced judgement.</p>

		<p>The Council must demonstrate how the policy remains justified in the light of its acceptance that “office need at least is unlikely to have increased” and the EDNA is yet to be updated. We have explained above that there is currently 2.5 million sq ft of vacant office floorspace in Reading. The LSH research also identifies that in 2022 the 12 month take up of offices was down 47% on the previous 10 year average and that office take up has not recovered to pre-Covid levels, which suggests that there is a substantial over supply of offices in Reading.</p> <p>Reading also has an Article 4 Direction in place to remove permitted development rights for a significant number of office buildings (including Reading Bridge House), as a means of discouraging change of use which means planning permission is required to enable the conversion of offices to residential. As a result proposals resulting in the loss of offices where protected by the Article 4 Direction are assessed by the Council via a planning application, so Policy EM3 must be updated to provide a reasonable policy basis to make a judgement on the acceptability of each application on its own merits.</p> <p>Furthermore, the 2019 Local Plan takes no account of up to date housing need. We deal with housing matters specifically below, but given the Council will need to plan for a significant uplift in housing, the repurposing of Borough’s obsolete office stock is vital to enable the Borough to achieve its housing delivery objectives. Policy EM3 must be updated to acknowledge this, or the Council risks failing to meet its objectively assessed needs such that the draft Plan would not be positively prepared.</p>	
TVCC	Y	We agree. It is very important to maintain an up-to-date assessment and information on employment need and requirements. This must focus on ensuring that the Plan has the right quality, quantity, and availability (esp. by location) of employment land to meet existing and future needs. As we state, elsewhere, the changing demand for employment – exacerbated by the most recent COVID-19 pandemic – necessitates ensure up-to-date information is available and meets business needs to invest and expand.	Answer is noted. No changes needed.
Stantec OBO SEGRO	Y	SEGRO agree with the proposed employment policies to be updated, including Policy EM1 (Provision of Employment Development).	Answer is noted. No changes needed.
Tricia Marcouse	Other	Not sure about em4, see answer to Q24	Noted. No change needed.

Q. 24 Are you aware of anything else that should be factored into an update to policy EM1?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Mark Treder	N/A	As above	See officer response to Q. 23.
CADRA	N/A	The policy considers core areas of employment. CADRA would like the policy to consider other areas where employment could help reduce the need to travel to core areas. This needs to be carefully balanced with the need to ensure residential areas remain pleasant and safe places to live.	Noted. The Local Plan approach seeks to reduce the need to travel and achieve a balance among a mix of uses.
Thames Water	N/A	For avoidance of doubt Thames Water believes that any review of industrial and warehouse space should include logistics and distribution as required by Paragraph 87 of the NPPF.	Noted. Logistics forms part of the review.
Jennifer Susan Cottee	N/A	I believe there is large unmet demand for very small low-cost units for existing and start-up businesses. Such units are important for a thriving and ever evolving economy.	Answer is noted. No changes proposed. This is sufficiently addressed by Policy EM4: Maintaining a Variety of Premises.
Opus Works (OBO AEW Core Plus Property Fund)	N/A	The client welcomes the recognition given in the LPU paragraphs 7.4 – 7.6 that demand for office and industrial space has altered post-pandemic and agrees with the proposal that the policy be updated to refer to updated needs for office and industrial and warehouse uses, taking account of the most up-to-date information; and that consideration be given to any opportunity to meet unmet need for employment uses from other authorities. The changes to Policy EM1 are supported.	Answer is noted. No changes needed.

TVCC	N/A	<p>Whilst reference is made that the COVID-19 pandemic may have affected demand (or rather reduced need for a period) for office space, the Plan appears not to identify that the pandemic increased the demand for light industrial and distribution sites. We believe the two are linked, and demand for light industrial and distribution remains, especially associated with home delivery, given more people are and remain working from home / greater flexible working of many companies.</p>	<p>Answer is noted. The policy will be updated to consider the latest needs for industrial and warehouse uses. No changes needed.</p>
Stantec OBO SEGRO	N/A	<p>As part of the Scope and Content (Regulation 18) consultation, RBC estimate that there has been an increase in industrial and warehouse space by around 20,000sqm since the Plan was adopted. However, this still leaves a substantial amount of industrial and warehouse space to be delivered. SEGRO's view is the employment need figure has increased since the date of the evidence base prepared for the now adopted Plan. In addition, occupiers are seeking modern space, often with larger footprints than existing stock. These factors need to be picked-up in the updated employment needs work to be prepared.</p> <p>See Paragraph 85 of the NPPF See Paragraph 025, Reference ID: 2a-025-20190220 of the PPG</p> <p>With regards to the impact of Covid and as evidenced by other authorities, office demand may have reduced but SEGRO are aware that given the increased demand in online retailing, there is a higher need for logistics space. As such, it is evident that the demand for employment and specifically logistics space will continue to increase and the Site as the largest employment allocation within the adopted Local Plan and LPPU will significantly help to meet this demand.</p> <p>The proposed changes to Policy EM1 relate to the policy being updated to refer to the most up to date information for office, industrial and warehouse needs and that consideration be given to any opportunity to meet unmet need for employment uses from other authorities. SEGRO offer to provide a market perspective on employment need and evidence of the significant need for strategic employment land in Reading Borough, together with wider needs in the area (i.e. Thames Valley).</p> <p>SEGRO are in agreement with the proposed changes to Policy EM1 and note the need for new and up to date information / evidence. It is recognised that new employment need evidence will also be applicable to Policy SR1 (Island Road Major Opportunity Area), given it is the largest allocation for employment. SEGRO considers that any updated evidence will recognise that the demand for employment is continuing to increase and given a lack of existing supply (particularly to meet occupier requirements for larger modern industrial space), there is an additional need for employment / logistics land on top of this existing allocation.</p> <p>As such, SEGRO request the right to submit further comments on the new assessment of employment need / updated evidence once prepared by RBC and offer to provide a market perspective on employment and strategic employment need.</p>	<p>Answer is noted. No changes needed. A Commercial Development Needs Assessment (CDNA) for Reading was carried out in 2024 and identifies the specific level of additional office, industrial and warehouse space need. These figures are now included in the draft.</p>
Tricia Marcouse	N/A	<p>Not sure about designation for this. There will be a need for more training centres giving practical skills training for new technologies and changes to old ones. is this covered in existing policies.</p>	<p>No changes proposed. Update relates to employment provision only. Training facilities is covered under existing policy OU1 which is not proposed to be updated within the LPPU.</p>
Graham Bates	N/A	<p>Delivery and warehouse jobs may have boomed and no doubt such companies would like more real estate but are they the jobs the Thames (Silicon) Valley wants and do they have a future. Employment markets are fickle. We boast about new film studios but the US streaming giants may not prove so reliable now US strikes are over. RBC needs far better insight into likely futures.</p>	<p>Comments are noted. No changes proposed. Policy will account for latest needs for office, industrial and warehouse uses, to help ensure future development is based on the most up to date evidence on needs.</p>

Q. 25 Do you have any comments on how policy EM2 should be updated?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Mark Treder	N/A	As above	See officer response to Q. 23.
CADRA	N/A	The policy considers core areas of employment. CADRA would like the policy to consider other areas where employment could help reduce the need to travel to core areas. This needs to be carefully balanced with the need to ensure residential areas remain pleasant and safe places to live.	See officer response to Q. 24.
Jennifer Susan Cottee	N/A	I look for mention of the inclusion of small business units in a variety of locations.	No changes proposed. Policy EM4 deals with maintaining a variety of premises and the supporting text sets out that adequate space for small and medium sized enterprises should be maintained.
TVCC	N/A	We maintain that whilst not always possible, the location of new employment should be positioned close to key transport hubs, or existing transport links, i.e. town centre and business/industrial parks where possible.	Answer is noted, however, no changes proposed. Supporting text of Policy EM2 states that employment development should be in highly accessible locations which are or will be served by a choice of means of transport.

Additional representations submitted via email regarding employment policies

Respondent name	Comments	RBC Officer Response
WBDC	<p>We note that RBC are to prepare evidence that looks at the employment needs in the Borough post-Covid, and once complete, consideration will be given to opportunities to meet unmet needs from other authorities. WBDC are undertaking a review of the Local Plan to cover the period to 2039. The Local Plan Review (LPR) was submitted to the Secretary of State in March 2023, and is currently undergoing independent examination.</p> <p>The 2022 Employment Land Review Addendum (ELR), which forms part of the evidence base for the LPR, recommends a need for a net increase in office floorspace of 50,816sq.m to 2039. There is, however, an unmet need of 50,816sq.m. In respect of industrial floorspace needs, the ELR recommends a minimum requirement of 91,109sq.m or 23ha of land in the period up to 2039. The LPR includes site allocations to assist in meeting this need, but there remains an unmet need of 32,709sq.m.</p> <p>WBDC therefore welcomes RBC's intention to consider opportunities to assist in meeting the above unmet needs. However, we acknowledge that there is still work to be done before RBC is in a position to determine their requirement and supply. WBDC are keen to continue a dialogue with RBC regarding any assistance that Reading may be able to provide once the picture is clearer.</p>	Noted. No change needed. The Commercial Development Needs Assessment identifies a level of employment needs that is challenging for RBC to accommodate within its boundaries, and as such there is unlikely to be substantial scope to deliver unmet needs from other authorities.
VOWH & SODC	We acknowledge that RBC has stated that it is likely to be available for unmet employment land from its neighbouring authorities, but based on our emerging Joint Local Plan we will have no employment or housing unmet needs.	Answer is noted. No changes required.
Bracknell Forest Council	In general, the approach within the Partial Update document is supported. However, without updated evidence, it is difficult to comment in detail at this stage. Para. 7.7 of the document indicates that RBC will consider the opportunity to accommodate unmet need for employment use from other Authorities – this approach is supported in terms of the Authorities in the Central Berkshire Functional Economic Area.	Answer is noted. No changes required.

Chapter 8: Housing

Q. 26 Do you agree that we should update the housing policies listed? (H1, H2, H3, H4, H5, H6, H7, H8 and H14)

Respondent name	Y/N/Other	Comments	RBC Officer Response
Christian Harris	N	No more flats	Do not agree, no changes proposed. Due to the urban nature of the borough, high-density development (such as flats) is often required to suit the needs of the residents, as well as family sized housing to meet housing targets.
Mark Treder	No answer	No point planning, as you cannot stick to it	No change needed. It is noted that there is a legal requirement for planning decisions to be taken in line with the development plan unless material considerations indicate otherwise.
Paul Oliver James Melville	Y	more family orientated HOUSES NOTAPARTMENTS. They should have gardens and parking areas. children tend to have better lives in green housing ie with gardens and outside space rather than High rise blocks.	Do not agree, no change proposed. Due to the urban nature of the borough, high-density development (such as flats), in addition to family-sized housing is often required to suit the needs of the residents, as well as to meet housing targets. Nevertheless policy H2 and H7, which are included within the Partial Update, both seek to allow for increases in family housing delivery across the borough to meet the need.
Elaine Digweed	Other	I think more housing should be considered for the people of Reading who have lived here for years, not for those just arriving and given a house. I know of many families who are having to live in social housing with people with mental health problems with drug and drink addictions and who are subjected to ASB. these people are hardworking low paid families, who cannot afford private rent, but are penalised to live in such circumstances which is not family friendly. Priority should be given to these people and instead of putting Anti social people with families put these into places where they can get rehab to get off substance abuse and be more polite.	No changes proposed. The relocation of individual families into social housing is a matter for the RBC Housing Team and does not fall under planning. Nonetheless the LPPU proposes an increase in delivery of family sized dwelling and continued provision of affordable housing.
CADRA	N	No. H10: Private and communal outdoor space should be reviewed in the light of the increase in family housing in the town centre. Whilst not underestimating the challenges, CADRA is very concerned that Para c below restricts the requirement on developers. <u>This is a critical issue for the future physical and mental health of children and young people living in the town centre.</u> <i>(c) Development in central Reading will not always be expected to comply with the standards set above. Open space is nonetheless required, unless exceptional circumstances prevail, to accommodate modest sitting out areas and clothes drying facilities.</i>	The Local Plan acknowledges the importance of private and communal outdoor space and seeks to strike a balance between efficient use of brownfield land to deliver much-needed housing and provision of outdoor space. Each application is considered on a case-by-case basis and officers will seek as much outdoor space as possible insofar as it does not affect viability or housing delivery.
Montagu Evans (OBO Vintage Capital (No.3))	Y	Yes we agree that the Council should update its housing policies. The Framework requires up to date Plans to provide a framework for meeting housing needs (Paragraph 15) and that the size, type and tenure of housing should be reflected in planning policies (Paragraph 62). As a result it is necessary for the Council to update its housing policies. We provide comments on specific policies below.	Answer is noted. No changes required.

Louise Acreman	No answer	H1, housing provision should be at most 700 a year, there is no space for more, by adding so many new homes a year puts pressure on overburdened communities and stores up health issues further down the line. H2, I don't think we should be increasing the density. By increasing the density it will put pressure on overburdened communities and stores up health issues further down the line. H5 all new homes should be zero carbon	Do not agree, no changes proposed. Initial results suggest there is capacity to accommodate approx. 800 homes per year. Minimum density standards are a national policy requirement and will vary appropriately for different types of areas with consideration given to matters such as residential amenity. Updates to policy H5 require all new homes to be net zero carbon.
RBC Private Sector Housing	Y	Changes in demand of property types need to be reflected in the policies. For instance the need for more family accommodation more 3 bedroom properties, issues with overcrowding causing damp and mould and health inequalities.	Answer is noted. No changes proposed. Policies H2 and CR6 seek to increase the % of family sized housing. The other issues listed are outside the remit of planning policy.
CAAC	Other	Agree in part Policy H9 House extensions and ancillary accommodation may need updating due to the phasing out of topic based SPDs.	SPDs will continue to exist for as long as the five year period of the plan. Therefore, there is no need to update H9 as a result of the change from SPDs.
Savills OBO Viridis	Y	Yes: the housing policies should be updated to ensure the LPPU is up-to-date, particularly in the context of delivering its housing requirements.	Answer is noted. No changes required.
Savills (OBO Sorbon Estates Ltd)	Y	Yes. The housing policies should be updated to ensure the LPPU is up-to-date, particularly in the context of delivering its housing requirements.	Answer is noted. No changes required.
Woolf Bond Planning (OBO Fairfax Planning)	Y	Yes, especially policy H1 for the reasons specified.	Answer is noted. No changes required.

Additional representations submitted via email regarding the updates to the housing policies

Respondent name	Comments	RBC Officer Response
Earley Town Council	ETC notes the comments on housing needs and the suggested figure of 800 dwellings per year, which is substantially ahead of the existing plan and below the "standard" calculation. Whilst it is noted that a "Memorandum" exists between adjacent Boroughs about being willing to absorb unmet needs, ETC is acutely aware of the difficulties that Wokingham Borough Council has in identifying areas for potential development to meet their own housing needs. As such, ETC would strongly oppose any overspill of development from Reading Borough into the Earley area to accommodate unmet needs.	Answer is noted. No changes required. Separate Duty to Cooperate meetings are taking place with Wokingham Borough Council.
Savills (OBO Beechcroft Developments Ltd)	In addition to Policy CA2, a number of other adopted Local Plan policies are relevant to informing the future development of the Site including the following policies, which are also identified in the 'Review of the Reading Borough Local Plan 2019' (March 2023) as requiring updating as part of the current Local Plan Review: <ul style="list-style-type: none"> • H1: Housing Provision • H2: Density And Mix • H3: Affordable Housing • H6: Accommodation For Vulnerable People • CC7: Design And The Public Realm 	Noted. The Housing Needs Assessment provides information on the level of need for retirement units and this is dealt with in policy H6.

	The commitment to review the above adopted Local Plan policies is supported, to consider recent changes to national planning policy, market conditions and local characteristics. We would welcome taking the latest evidence into account for the level of accommodation for vulnerable people, which shows there is a high demand and undersupply of supported homes for the elderly in the Borough; with over a 1000 care home spaces in shortfall within 5 miles of the Site and significant shortfall in sheltered/retirement homes and assisted living too. In this regard it is worth noting that the Mayhew Review ¹ , recommended the construction of up to 50,000 new retirement units per annum to help alleviate the housing crisis.	
--	---	--

Q. 27 Do you have any comments on the amount of housing that Reading should be planning for? (This question relates to policy H1)

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	N/A	If sufficient infrastructure is in place Reading can plan for additional housing. I would look to only build in areas of suitable elevation to mitigate future water level rises.	No changes proposed. Mitigating flood risk is addressed under policy EN18 and the NPPF.
Adam Boulding	N/A	i think your assessment is correct	Noted. No change needed.
Henry Wright	N/A	Reading should aim for 1,000 homes per year to make as large as possible contribution to fighting to the housing crisis. 877 should be a minimum with 1000 as the stretch target.	Noted. No change proposed. This is above both the level of need (based on current methodologies) and the capacity of the Borough.
Christian Harris	N/A	No more flats	Do not agree, no changes proposed. Due to the urban nature of the borough, high-density development (such as flats) is often required to suit the needs of the residents, as well as housing to meet housing targets.
Reading Climate Action Network	N/A	I don't have an opinion on this	Noted. No change needed.
Paul Oliver James Melville	N/A	less high rise.	It is unclear what is exactly meant by 'high rise'. Due to the urban nature of the borough, high-density development (which could be interpreted as 'high rise') is often required to suit the needs of the residents, as well as housing to meet housing targets. Building heights are dealt within under the Tall Buildings policy (CR10), of which is not subject to any changes within the update. It is noted that design guidance will be provided for any new allocated sites.
Elaine Digweed	N/A	Planning should include houses for people who work but can't afford private rent	No changes proposed Affordable housing (including affordable rent) is dealt with in Policy H3.
CADRA	N/A	CADRA regrets the imposition of the 35% uplift for Reading, particularly as the issue is not adequately shared with neighbouring authorities. We support additional assessment of both the need and the capacity to provide appropriate living conditions. We hope this will consider a realistic assessment of town centre living conditions for families.	Answer is noted. No changes needed.
Montagu Evans (OBO Vintage Capital (No.3))	N/A	The Framework accepts that there may be 'exceptional circumstances' which justify use of an alternative approach to assessing housing need but the Regulation 18 Plan does not identify any such circumstances that would justify a deviation from the standard method. The Council explains that it is preparing its own Housing Needs Assessment to justify a deviation from the standard methodology. Reading claims that the local housing need is considerably lower than the figure produced by the standard methodology, but this evidence has not been published as part of the	No changes needed. Indicative conclusions from the Housing Needs Assessment were set out within the Regulation 18 document, and the full report will be published alongside the Regulation 19 consultation for comment.

		Regulation 18 consultation. It is therefore premature any other conclusion than to Plan to meet its housing need as per the standard method.	
Louise Acreman	N/A	H1, housing provision should be at most 700 a year, there is no space for more, by adding so many new homes a year puts pressure on overburdened communities and stores up health issues further down the line.	Comments noted. High levels of housing delivery are required by National Policy and help to meet the significant need for housing in the area, particularly affordable housing. The Local Plan aims to deliver sustainable development, accompanied by the appropriate infrastructure in order to mitigate any negative environmental, social or economic effects.
Damians Bramanis	N/A	I don't believe that Reading's infrastructure is able to handle the proposed additional housing. It's currently near-impossible to register with a GP or a dentist, schools are oversubscribed, and there are significant traffic bottlenecks. While these targets could be appropriate at a national level, they would severely strain Reading's facilities.	No changes proposed. It is acknowledged that infrastructure is required to support new development. The Council is liaising with infrastructure providers to determine long term strategic infrastructure needs as a result of the planned growth within the Borough. This is set out within the Infrastructure Delivery Plan.
Jennifer Susan Cottee	N/A	I agree with the proposed changes	Answer is noted
RBC Private Sector Housing	N/A	Private Sector Housing are aware of over crowding issues and a high demand for private rented within the area.	Answer is noted. No changes needed.
HBF	N/A	Without the council's assessment of need it is not possible to state whether the initial figure of 735 dpa is robust. However, the HBF have some concerns with regard to the reasons for dismissing the standard method on the basis of cities and urban uplift. This uplift is not included in the standard method as a reflection of local needs but on the basis that the Government considers it necessary to maintain its commitment to delivering 300,000 homes each year and that cities and urban centres to be the most sustainable location for new development. This was most clearly articulated in the Government response to the local housing need proposals in " <i>Changes to the current planning system</i> " in April 2021 which stated three strong reasons for applying such an uplift. As such there would not appear to be the exceptional circumstances to depart from the standard method as is being suggested, and the Council should seek to maximise delivery to try and meet standard method in full. However, the HBF recognise that it may not be possible for a tightly bounded authority such as Reading to meet those needs in full. In such circumstances the NPPF outlines that the uplift should be met in the city or urban centre except where there are voluntary cross boundary redistribution agreements in place to deliver these homes elsewhere. Therefore, if the Council cannot meet its housing needs in full it will still need to seek voluntary arrangements for their delivery elsewhere as part of the duty to co-operate and to ensure that evidence of these discussions is published at the next stage of the consultation. If the Council cannot meet needs in full then the requirement will be a capacity led figure. At present it is stated that this will be around 800 dpa. Without the necessary evidence available at this stage, it is not possible to say whether this figure is accurate, but the HBF would recommend that it is prefixed with the phrase at least. It is necessary even with a capacity led requirements that this be seen as a minimum and not ceiling on what should be delivered.	No change proposed. For clarity, the simple fact that Reading is subject to the urban uplift is not an exceptional circumstances argument in itself, but it nonetheless does indicate that Reading should give consideration to what its actual local needs are. The Housing Need Assessment outlines how this plays into the exceptional circumstances argument.
Reading Friends of the Earth	N/A	Any increase is likely to add to environmental impact and reduce available land for future developments. Having a single number of 'homes' as a target is unsophisticated. Analysis – on a 'Greater Reading' basis - should include demographic and economic forecasts leading to numbers of different types of housing to be aimed for – with tolerance bands. 2040 is a long way off.	Comments noted. High levels of housing delivery are required by National Policy and help to meet the significant need for housing in the area, particularly affordable housing. It is unclear what

		<p>Sustainability is more important than whether Reading is a 'large urban area.' 35% 'large urban area uplift' is only reasonable if local transport, jobs, and amenity problems can be solved and Reading is a good location for additional housing and population. Can adequate transport infrastructure be provided on existing layout of fairly narrow streets which make it difficult to provide lanes for buses, bikes and trams? Can sufficient employment be provided? Can sufficient renewable energy be sourced?</p>	<p>is meant by "tolerance bands," but the Local Plan Housing Needs Assessment seeks to determine the different sizes and tenure types of housing required during the plan period.</p> <p>The Local Plan aims to deliver sustainable development, accompanied by the appropriate infrastructure in order to mitigate any negative environmental, social or economic effects.</p>
Stantec OBO St Edwards Homes	N/A	<p>See Paragraph 61 of the NPPF. No evidence has been provided by the Council to demonstrate any 'exceptional circumstances' which justify an alternative approach to assessing housing need. Equally, no details have been provided as to the alternative method of calculating housing need. In this regard, the proposed approach to calculating need is not justified or consistent with national policy and therefore not sound.</p> <p>Whilst we acknowledge that the Council are seeking to be realistic by considering what capacity there is within the Borough for development, this should be a separate consideration to that of identified need or requirement. As such, we do not consider the proposed approach to Policy H1 to be sound, particularly when opportunities for needs to be provided for by neighbouring authorities have not been fully explored and confirmed to be exhausted.</p> <p>The Sustainability Appraisal (SA) should reflect that housing provision in accordance with the standard method will have a greater positive effect on SA Objective 13 compared to the proposed lower figure as housing needs will be met in full. In this regard, whilst we support the scoring in the SA of Option H1(v) (735dpa) being lower than Options H1(iv) (877dpa) and H1(i) (800dpa) we do not agree that the current scoring of Option H1(i) is appropriate. Currently, the scoring and comments within the SA on Options H1(i) and H1(iv) are identical and in doing so fail to reflect the benefit that would result from meeting needs in full. Moreover, the conclusion drawn within the SA in respect of Policy H1 states that Option H(i) (800dpa) would be: the preferred approach as this would deliver beyond the local identified need for housing and would be in line with the borough's capacity, avoiding unnecessary over development whilst enabling an ample supply of housing for current and future generations.</p> <p>This conclusion is inappropriate as provision of 877dpa would not result in 'unnecessary over development'; rather it would ensure that needs in the Borough are fully met.</p> <p>In order to properly address the need for housing in the Borough, identified needs will need to be met in full. Sites such as land at Green Park Village can make an important contribution towards addressing housing needs. As we discuss below, the site is suitable, available and deliverable, offering an opportunity for high-quality development in a sustainable location.</p>	<p>No change proposed. The Housing Needs Assessment, a full draft of which was not available at Reg 18 stage, has now been finalised and this looks at the exceptional circumstances as well as at how the need has been derived.</p> <p>The Sustainability Appraisal came to the correct conclusion based on understanding of the capacity of Reading at the time. This has now been refined through the Housing and Economic Land Availability Assessment, and the dwelling number increased to 825.</p> <p>It is important to note that whilst the scoring in the SA is a useful indication, it is not always possible to give a different score for every level of housing provision. What is important is that the effects are identified and mitigation provided if necessary.</p> <p>The site at Green Park Village is within the DEPZ for AWE Burghfield, and would lead to an increased population in this area, which is not considered likely to be supportable by the off-site emergency plan.</p>
Savills OBO Viridis	N/A	<p>The Local Assessment referred to has not been published as part of this consultation and therefore it is not possible to comment on whether this is a robust assessment of need. [The council's proposed approach] does not accord with national policy set out in the NPPF or PPG, and would not serve to "boost significantly the supply of housing" that is a key element of national planning policy (NPPF paragraph 60). Exceptional circumstances would need to be demonstrated to justify this approach. Furthermore, given the Council has not published its assessment of capacity, it is also not possible to comment on whether this indication of capacity is robust.</p> <p>Until such time as these crucial elements of the evidence base are published, we suggest the Council should be aiming to deliver a housing requirement that matches or exceeds the requirements provided by the Standard Methodology (including urban uplift), in order to align with the objectives of the LPPU (in particular, objectives 1 and 2 which seek to strengthen the role of Reading and ensure as many new homes as possible are delivered) and,</p>	<p>No change proposed. The Housing Needs Assessment and Housing and Economic Land Availability Assessment have now been finalised and will be available for the Reg 19 consultation.</p>

		<p>importantly, address issues of affordability which will otherwise negatively impact the economic performance of the town. This approach accords with paragraph 62 of the NPPF (December 2023).</p> <p>As such this policy approach is not supported, and rather the LPPU should be aiming to deliver a housing requirement that matches or exceeds the requirements provided by the full Standard Methodology.</p>	
Opus Works (OBO AEW and McLaren (Broad Street Mall))	N/A	<p>The Council has a strong track record of housing delivery in tandem with a secure pipeline of sites to deliver housing need for the next 5 years. It is therefore considered that the Council's locally assessed need of 735dpa will ensure that the Reading can meet its housing need for the plan period and contribute to the growth agenda without threatening the delivering of other strategic policies which may be jeopardised were the Council to pursue the option to deliver housing in accordance with the Standard Method. Furthermore, the Council's own research has demonstrated that it would not be possible to accommodate the Standard Method need in full, which would mean a reliance on exporting unmet need elsewhere.</p> <p>It is considered that the most effective and reliable route to ensure that the Council can deliver its locally assessed need is through: more efficient use of existing allocations including appropriate increases in density; better use of under-utilised previously-developed sites in the town; and the adoption of a range of accommodation types including BtR and Co-living which offer valuable housing choice, but in terms of the latter Reading has hitherto not facilitated. Policy H1 is supported. The Council should ensure the referenced 'detailed capacity work' should include revisiting the capacity of allocated sites and considering a range of housing and accommodation typologies including Co-living which are playing an increasingly vital part in meeting the housing needs of younger professionals in towns and cities across the Country.</p>	Noted. No change needed. The Housing and Economic Land Availability Assessment has revisited the capacity of existing sites, and in many cases led to an uplift. Specific co-living typologies are not included, although there are measures in the HELAA to allow for non-C3 accommodation.
Opus Works (OBO British Estates Services Ltd)	N/A	<p>It is considered that the most effective and reliable route to ensure that the Council can deliver its locally assessed need is through: more efficient use of existing allocations including appropriate increases in density and better use of previously-developed such as that proposed at Site Wes3, which in turn will provide development that is more compatible with its predominantly residential surroundings.</p> <p>Policy H1 is supported.</p>	Noted. No change needed.
Opus Works (OBO Moda Living)	N/A	<p>It is recognised that meeting full SM would be challenging given Reading's constrained boundaries. In this regard, a policy that is flexible and allows for additional development over that identified by locally assessed need will help contribute to the growth agenda that Reading is keen to promote. Further delivery on housing need can be achieved through more efficient use of existing allocations, increases in density, a pragmatic and inclusive approach to urban design and the adoption of a range of accommodation types including co-living.</p>	Noted. No change needed.
Opus Works (OBO AEW Core Plus Property Fund)	N/A	<p>It is considered that the most effective and reliable route to ensure that the Council can deliver its locally assessed need is through: more efficient use of existing allocations including appropriate increases in density; better use of under-utilised previously-developed sites in the town; and the adoption of a range of accommodation types including BtR and Co-living which offer valuable housing choice, but in terms of the latter Reading has hitherto not facilitated.</p> <p>Policy H1 is supported. The Council should ensure the referenced 'detailed capacity work' should include revisiting the capacity of allocated sites and considering a range of housing and accommodation typologies including Co-living which are playing an increasingly vital part in meeting the housing needs of younger professionals in towns and cities across the Country.</p>	Noted. No change needed. The Housing and Economic Land Availability Assessment has revisited the capacity of existing sites, and in many cases led to an uplift. Specific co-living typologies are not included, although there are measures in the HELAA to allow for non-C3 accommodation.
Opus Works (OBO Mapledurham Properties Ltd)	N/A	<p>It is considered that the most effective and reliable route to ensure that the Council can deliver its locally assessed need is through: more efficient use of existing allocations including appropriate increases in density; better use of under-utilised previously-developed sites in the town; and the adoption of a range of accommodation types including BtR and Co-living which offer valuable housing choice, but in terms of the latter Reading has hitherto not facilitated.</p>	Noted. No change needed. The Housing and Economic Land Availability Assessment has revisited the capacity of existing sites, and in many cases led to an uplift. Specific co-living typologies are not included, although there are

		<p>Policy H1 is supported. The Council should ensure the referenced 'detailed capacity work' should include revisiting the capacity of allocated sites and considering a range of housing and accommodation typologies including Co-living which are playing an increasingly vital part in meeting the housing needs of younger professionals in towns and cities across the Country.</p>	<p>measures in the HELAA to allow for non-C3 accommodation.</p>
<p>Montagu Evans (OBO Abrdn)</p>	<p>N/A</p>	<p>If this approach is adopted the plan would not be positively prepared or justified as there are appropriate and reasonable alternatives.</p> <p>Although the Framework acknowledges the possibility of 'exceptional circumstances' justifying an alternative approach to assessing housing needs, the Regulation 18 Plan does not specify any such circumstances warranting deviation from the standard method. The Council asserts that it is preparing its own Housing Needs Assessment to support a departure from the standard methodology. Reading contends that the local housing need is significantly lower than the figure derived from the standard methodology, but this supporting evidence has not been disclosed in the Regulation 18 consultation, it therefore fails to be justified. Consequently, it is premature to draw any conclusion other than planning to meet the housing need as per the standard method.</p> <p>In light of this, the Council should adhere to the standard method to ensure the Plan is positively prepared. This marks a substantial increase from the adopted Local Plan target of 689 homes per year, underscoring the need to reconsider the current protective policy on existing offices due to the scarcity of land in the Borough, as well as reconsidering the capacity of existing allocations.</p>	<p>No change proposed. The Housing Needs Assessment has now been finalised and will be available for the Reg 19 consultation.</p>
<p>Savills (OBO John Lewis Partnership)</p>	<p>N/A</p>	<p>The Council consider that the use of the standard methodology (including the required 35% uplift) would not be appropriate as it would not be based on a local need.</p> <p>In this regard, it is important to note the Government's key objective of 'significantly boosting the supply of homes' (NPPF paragraph 60). See also paragraph 61. It is not clear what the exceptional circumstances are considered to be justify such an alternative approach. The proposed approach to set an annual housing requirement based on available supply, rather than need, therefore does not align with the provisions of the NPPF (2023).</p> <p>On this basis and given that the objectives of the LPPU seek to strengthen the role of Reading and ensure as many new homes as possible are delivered (e.g. objectives 1 and 2), we suggest that the Council should be aiming to deliver a housing requirement that matches or exceeds the requirements provided by the standard method.</p>	<p>No change proposed. The Housing Needs Assessment has now been finalised and will be available for the Reg 19 consultation.</p>
<p>Savills (OBO Sorbon Estates Ltd)</p>	<p>N/A</p>	<p>In the context of the updates to this policy, it is important that the LPPU remains focused on addressing the borough's future local housing needs, in particular, in light of the continuing national housing crisis and increasing local housing needs. The NPPF (paragraph 60) sets out the Government's key objective of 'significantly boosting the supply of homes'. See also paragraph 61. Given the Council has not published its assessment of capacity, it is also not possible to comment on whether this indication of capacity is robust.</p> <p>Therefore, it is considered that the Council should be more ambitious and seek to provide a quantum of housing that properly reflects the Standard Method and the necessary 35% urban uplift. It is not clear from the consultation document what the exceptional circumstances are to depart from this. The proposed approach to set an annual housing requirement based on available supply, rather than need, therefore does not align with the provisions of the NPPF.</p> <p>In addition, the Vision and Objectives in the adopted Local Plan 2019 support an approach that would indicate the necessity to utilise the Standard Method for calculating the need and planning for as many new homes as possible. Objectives 1 and 2(paragraph 2.2.2) identify the need to strengthen the role of Reading for new homes and deliver as many homes as possible, including affordable housing.</p>	<p>No change proposed. The Housing Needs Assessment has now been finalised and will be available for the Reg 19 consultation.</p> <p>It is important to note that whilst the scoring in the SA is a useful indication, it is not always possible to give a different score for every level of housing provision. What is important is that the effects are identified and mitigation provided if necessary.</p>

		<p>The latest Authority Monitoring Report (AMR) (December 2023) in Table 8.1 identifies that the delivery in some recent years has been below the current 689dpa as well as the Standard Method requirement. Further to this, paragraph 8.17 of the AMR identifies that affordable housing has fallen significantly short on some major sites. Therefore, there is a clear need to plan positively for an increased quantum of homes moving forward to increase and improve delivery.</p> <p>It is also noted that in reviewing the approaches to an updated Policy H1, the SA's assessment of the LPPU preferred alternative approach in contrast to the Standard Method, scores identically when reviewing the Sustainability Objectives and Effect. Therefore the evidential and sustainability basis for the LPPU preferred approach is unclear, given the Standard Method scores equally as positive.</p> <p>Site SOU1 – Reading Link Retail Park, provides an opportunity to contribute to both Readings and England's housing supply, within the updated plan period.</p>	
The Planning Bureau on behalf of McCarthy Stone	N/A	<p>Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. See paragraphs 60 and 63.</p> <p>It is well documented that the UK has an ageing population. It is generally recognised (for example, within the Homes for Later Living Report September 2019). That there is a need to deliver 30,000 retirement and extra care houses a year in the UK to keep pace with demand. The current consultation implies that the Partial Update of the Local Plan will update the Plan to predominantly consider care bed space rather than specialist housing to meet the needs of older people. However the specific housing needs of older people now needs to be considered given the additional emphasis in para 63 of the new NPPF.</p> <p>The age profile of Reading can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 20,020 persons aged 65 and over in 2018, accounting for 12.3% of the total population of the Council area. This age range is projected to increase by 10,238 individuals, or 51.1%, to 30,258 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 18.1% of the total population of Reading by 2043.</p> <p>In 2018 there were 5,789 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 4,001 individuals, or 69.1%, to 9,790 between 2018 and 2043. The population aged 80 and over is anticipated to represent a higher proportion of Reading's residents, accounting for 3.6 % of the total population in 2018 and increasing to 5.9% by 2043.</p> <p>It is therefore clear there will be a significant increase in older people and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan alongside family homes and the council should ensure that the correct amount of housing for older people is also planned for.</p> <p>Please see our answer to question 37 for a full response.</p>	Noted. The Housing Needs Assessment has been finalised, and this considers the housing needs of older people, leading to a range of needs being identified as part of policy H6.
M Langshaw	N/A	The 735 dwellings per year option. Reading is already densely packed.	<p>Comments noted. High levels of housing delivery are required by national policy and helps to meet the significant need for housing in the area, especially affordable housing.</p> <p>The Local Plan aims to deliver sustainable development, accompanied by the appropriate infrastructure in order to mitigate any negative environmental, social or economic effects.</p>

<p>Woolf Bond Planning (OBO Fairfax Planning)</p>	<p>N/A</p>	<p>Reading borough must plan for at least 877 dwellings annually, consistent with the output of the standard method. The issue of shortfall must be addressed through the Duty to Cooperate. The clear functional relationship of South Oxfordshire with Reading Borough (including its location within the Travel to Work area), access to higher order health, education, leisure and recreational facilities together with employment and retail facilities alongside quality frequent public transport services means that it is a sustainable location to support the wider Reading economy. The emerging Local Plan should ensure it facilitates growth within South Oxfordshire District given these inherent sustainable characteristics.</p>	<p>No change proposed. The Council considers there are exceptional circumstances for using the 735 dwellings per annum figure.</p>
<p>Gladman</p>	<p>N/A</p>	<p>These work streams are still being prepared and no evidence supporting the [housing] figures has been provided alongside the current consultation, therefore, it is not possible to examine the proposed figures and Gladman reserve the right to respond in more detail during further consultation opportunities. Notwithstanding this, Gladman consider that the proposed local housing need figure is not positively prepared, justified or consistent with national policy, while the proposed housing land availability up to 2041 presents an overly optimistic figure that is unlikely to be achievable. Responding to the proposed local housing need figure first; it is acknowledged that Reading is subject to environmental and policy constraints alongside a tightly drawn administrative boundary limiting the development opportunities for the city. Therefore, the setting of a capacity-based housing requirement may be appropriate where all opportunities to address housing needs have been explored.</p> <p>Notwithstanding this, the PPG is clear that the standard method for assessing local housing need provides a starting point in determining the local housing needed in an area and does not attempt to understand factors such as economic circumstances or other demographic behaviours. The PPG provides further examples where it may be appropriate for authorities to plan for more than the local housing need figure including growth strategies, strategic infrastructure improvements and unmet need but it is clear that is not an exhaustive list.</p> <p>The 35% uplift is not included within the standard method as a reflection of local needs, rather it is a conscious policy directive from Government who consider it necessary to maintain its commitment to delivering 300,000 homes each year with urban centres representing the most sustainable locations for new development. This was most clearly articulated in [see the Government response to the local housing need proposals in “<i>Changes to the current planning system</i>”]. See also the Government response to the Levelling-up and Regeneration Bill: reforms to national planning policy consultation (December 2023) on delivering the urban uplift (questions 13,14 and 15).</p> <p>Therefore, Gladman do not consider that there are exceptional circumstances to deviate from using the standard method to set the starting point for the authority’s housing requirement figure.</p> <p>Secondly, in response to the proposed housing supply estimates in Reading up to 2041, and indeed beyond, it is considered that an average annual capacity of 800 dwellings is unrealistic and very unlikely to be achieved. Between 2010 and 2023, 4,710 new homes have been delivered in Reading equating to an annual average of 393 dwellings⁴. Peak delivery occurred in the 2017/18 monitoring year where 670 homes were completed.</p> <p>Reading has not come close to delivering [it’s existing] need and this also stands against the objectively assessed need, identified in the Berkshire (with South Bucks) Strategic Housing Market Assessment (2016), of 699 dpa and resulted in an identified housing shortfall up to 2036 of 230 dwellings to be addressed within the Western Berkshire HMA.</p> <p>Without site of the updated HELAA it is difficult to understand the housing supply of Reading over future monitoring years but Appendix III of the 2021/22 AMR suggests an average annual potential housing supply capacity up to 2036 of 765 homes. This is also set in a context of significant constraints to new development in Reading including, but not limited to, a tightly drawn administrative boundary, flood risk and planning restrictions associated with the nuclear installations at AWE Aldermaston and Burghfield. Furthermore, greenfield development capable of viably delivering a</p>	<p>The Housing Needs Assessment sets out the methodology for identifying a need of 735 homes per annum, which includes demographic and economic factors. It also explains the exceptional circumstances case. It is appreciated that this was not published at the time of the Reg 18 consultation, but will be available alongside the Reg 19 consultation. On this basis, the Council does not consider that there will be an unmet need.</p> <p>The capacity for Reading is as assessed in its Housing and Economic Land Availability Assessment, and is now considered to be 825 homes per annum.</p> <p>The figures used in the Gladman response do not remotely tally with the Council’s own monitoring of its housing completions as set out in the published Residential Commitments documents, which show that over the adopted plan period so far (2013-2024) Reading has delivered an annual average of 706 homes per year, above the level of need, with peak delivery levels of 910 in 2018-19 and 1021 in 2023-24.</p> <p>The Housing Trajectory in the AMR does not take new allocations into account.</p>

		<p>range of housing types and sizes must be delivered alongside high-density brownfield development to ensure all identified housing needs are met.</p> <p>A detailed analysis of the historic housing delivery, constraints to delivery and future development growth opportunities across the Western Berkshire HMA including opportunities to the north of Reading are set out in Appendices 1 and 2 (with a more detailed assessment set out in a supporting Story Map).</p> <p>It is in the Council's gift to seek to work collaboratively with neighbouring authorities to agree a suitable mechanism for quantifying and distributing the housing shortfall over future monitoring years within Reading to the other neighbouring authority areas. Successfully meeting the unmet housing need will require continued coordination and deliberate efforts, with the Council acting as a leading stakeholder in this process. This is vital to ensure the housing needs of real people are addressed and to support the socio-economic prosperity and growth of the region. The Council should be seeking to meet, in full, the minimum local housing need figure as calculated using the standard methodology.</p>	
Iceni (OBO TT Group)	N/A	TTG agrees that the local housing need should be updated to 877 homes per year. Updating the policy to be representative of the true local need would help to encourage greater delivery of housing.	No change proposed.

Additional representations submitted via email regarding the amount of housing that Reading is planning for

Respondent name	Comments	RBC Officer Response
Earley Town Council	ETC notes the comments on housing needs and the suggested figure of 800 dwellings per year, which is substantially ahead of the existing plan and below the "standard" calculation. Whilst it is noted that a "Memorandum" exists between adjacent Boroughs about being willing to absorb unmet needs, ETC is acutely aware of the difficulties that Wokingham Borough Council has in identifying areas for potential development to meet their own housing needs. As such, ETC would strongly oppose any overspill of development from Reading Borough into the Earley area to accommodate unmet needs.	Answer is noted. No changes required. Separate Duty to Cooperate meetings are taking place with Wokingham Borough Council.
ICB	The ICB requires the additional demand for primary healthcare services of these new housing developments to be formally addressed. The ICB has the statutory duty to ensure that primary healthcare services are adequate provided. Therefore, appropriate mitigation measures should be identified in each major housing development schemes, to ensure that both existing and new residents, as set out in the vision of the Plan, which sets out that Reading's residents will have access to adequate services and facilities.	Noted. Change proposed to emphasise the importance of providing healthcare facilities to meet needs through Policy CC9: Security Infrastructure.
ICB	The ICB does not raise objection to any of the proposed changes. However, the Local Plan should ensure that the primary healthcare provision and capacity can be adequate to accommodate to the projected population growth.	Noted. Change proposed to emphasise the importance of providing healthcare facilities to meet needs through Policy CC9: Security Infrastructure.
WBDC	WBDC support the need to review the amount of housing required due to the changing approach to calculating housing need since the Reading Local Plan was adopted. WBDC note that it is RBC's intention to use a housing provision figure based on an alternative methodology that considers genuine needs and the development capacity of sites. The emerging findings of the housing need evidence and analysis of development capacity suggests a housing provision figure that could be accommodated fully within Reading Borough without any unmet need having to be accommodated within other authorities. In principle WBDC support Reading's approach, however we acknowledge that the housing need evidence is not yet complete and further detailed capacity work is required. We look forward to having sight of this work once complete.	Answer is noted. No changes needed.
Woolf Bond Planning	With reference to the inclusion of our client's site (9 Upper Crown Street) as a draft allocation, it is noted that there is a pending planning application (LPA Ref. 230814) proposing the erection of 46 dwellings on the site. The Council's Planning Applications Committee on 4th October 2023 resolved to approve this application subject to the signing of a Section 106 agreement (officer's report attached as Annex 2 to this submission). Whilst the S106 is nearing completion, it is clear that the Council in determining applications considers that the draft allocated site could accommodate a minimum 46 dwellings through resolving to grant planning permission at the site.	Noted. It has now been resolved to grant permission on this site subject to S106, and as such an allocation in the Local Plan is not required.

	<p>This capacity takes account of the specific characteristics of the location and its suitability for higher density development particularly resulting from its proximity to the town centre, its brownfield nature and its transitional location between medium density (to the south and east) and higher density (to the west and north) development. Acknowledging its effective “approved” capacity will enhance its role in contributing towards addressing the significant need for homes in the Borough, arising through derivation of local housing need (including the 35% uplift). We therefore advocate that this is acknowledged in the Local Plan review.</p> <p>Further, as suggested in this representation there is the opportunity to provide a modest further increase in density at our client’s land at 9 Upper Crown Street and in doing so an increase in its potential capacity to 56 dwellings, thereby making a more efficient use of its land and its identification as a suitable site for residential development in the Local Plan review.</p> <p>As Reading Borough have yet to reach the publication stage of a draft submission plan, the Council’s expected adoption date of 2025 is not considered realistic given that as indicated this stage typically takes over two years. This would mean that to ensure a 15 year plan period post adoption (required by NPPF paragraph 22) is achieved would necessitate a longer plan period, probably to no earlier than 2043.</p> <p>Although the draft Plan suggests that the initial estimates of the capacity of the Borough to accommodate homes is for 800 dwellings each year, for the reasons detailed we believe that there is scope to accommodate further development.</p> <p>The NPPF maintains the Government’s objective of significantly boosting the supply homes (para 60). Ministerial Statements (Secretary of State for Levelling Up Housing & Communities, Michael Gove, December 2023) represent material considerations (para 6) confirm in the context of the new December 2023 NPPF that the Government target of 300,000 new homes per year remains. See para 1 and 62 of the NPPF</p> <p>This is further confirmed when taking into account NPPF paragraphs, 123, 124d, 125, 126b, 129 and 130.</p> <p>It is evident, in the context of the NPPF as a whole, that a “significant” uplift in the average density of residential development may be inappropriate if the resulting built form would be “wholly” out of character with the existing area. In this regard, paragraph 130 sets a high bar in terms of development, being unacceptable. For instance, if a development, as in this case, results in an increased intensity by comparison to the existing site and neighbouring area, then the extent of the uplift in density needs to be “significant” (the test in paragraph, 130), and the impact has to be so material as to be “wholly” out of character (the other test in paragraph 130), for the proposal to be unacceptable. This national policy therefore points towards a yet stronger need for an uplift in average density of residential development in existing urban areas. Sites such as Land at 9 Upper Crown Street, Reading offer an opportunity for such densification and within this clear national policy context, the site’s identification for circa 56 dwellings within a Local Plan review allocation policy offers an important opportunity towards seeking to meet national housing (and its associated location) policy requirements.</p>	
<p>VOWH & SODC</p>	<p>We jointly support the locally-based housing need assessment approach to calculating your housing need, with around 735 homes to be delivered per annum. Selecting this approach to establish your housing requirement gives Reading the best chance for the Local Plan to meet housing need, considering your estimated capabilities of delivering 800 homes per annum.</p> <p>Conversely, the standard method plus 35% uplift (which is applied to the top 20 cities in England) would exceed the 800 homes per annum capability within the RBC boundary, increasing reliance on neighbouring authorities to accommodate any unmet need (or to rely on more significant support to meet that need).</p> <p>In summary, both South Oxfordshire and Vale of White Horse councils recommend that RBC progress with a locally-based housing requirement which would enable Reading’s housing need to be accommodated as much as possible within Reading.</p>	<p>No changes proposed. The Council’s preferred approach is to set a housing provision figure within the region of 800 homes per year, based on available capacity within the borough, without the need to export unmet needs elsewhere.</p>

<p>TOWN</p>	<p>See NPPF Paragraph 1 and 11a. Whilst we understand that the Local Plan cannot allocate sites on its borders outside its administrative areas, we consider the Local Plan could and should explicitly recognise the opportunities for collaboration to bring forward development on its western boundary. Indeed, although paragraph 8.8 refers to Reading's existing shortfall as set out in existing policy (to distinguish that from any additional shortfall under the current review) there is no clarity as to if, how and where, this existing shortfall has been met. No Statement of Common Ground between the West of Berkshire Authorities addresses this shortfall.</p> <p>The review should at the very least encourage adjoining authorities to assess and where appropriate allocate homes within or on the border of the existing urban area that could meet both West Berkshire's housing needs whilst also offering open market family housing in close proximity to the western part of Reading's urban area. This would also be consistent with Reading's own strategy (see 3.2.1 of the adopted Reading Borough Local Plan) and obligations to promote a sustainable pattern of development as well the objective of seeking to meet the development needs of its area.</p> <p>Secondly whilst we note the claim that there are exceptional circumstances that warrant Reading departing from the standard methodology (the work is said to be underway and will be published in due course but is not yet available) which would mean a reliance on exporting unmet need elsewhere we can see no evidence of active and real collaboration with neighbouring LPAs in an effort to consider the extent to which land could be made available elsewhere to meet these unmet needs. Indeed the language used at the end of paragraph 8 .8 " <i>Unmet needs would need to be considered afresh</i>" suggests this process has yet to be begun.</p> <p>We note at paragraph 8.3 the reference to the shortfall of 10 dwellings pa to 2036 in the current local plan that should be met outside Reading's boundaries. We understand that this unmet need will arise during the second half of the plan period. The fact that none of the local authorities have sought to provide for any of this shortfall is a failure of the Duty to Co-operate of the Local Planning Authorities that comprise the West of Berkshire Housing Market Area;</p> <p>The Council's arguments supporting a locally based housing need figure of around 735 dpa are noted – though of course the evidence to support such a figure has yet to be provided. The December 2023 version of the NPPF makes it clear that the Standard Methodology is a starting point for the calculation of housing need through local plans. However, the West of Berkshire Housing Market Area is amongst the most unaffordable places in the Country to purchase a property. Reading itself is in the upper quartile of English unitary authorities with the least affordable house price to median residence-based earnings ratio. Building fewer houses than the standard methodology suggests would not assist in making the area more affordable;</p> <p>Accordingly, we would support the Reading Local Plan adopting a housing need figure as generated by the standard methodology (c877 homes pa) with the shortfall (an estimated 77dpa) being met in the other West of Berkshire HMA authorities on sustainable sites around the borders of the City but still within its functional urban area;</p> <p>We recognise that the constrained nature of sites within the Council's area would favour the development of smaller units compared to lower density family housing;</p> <p>This is again an area in which sites in other Council areas close to Reading's boundaries can assist, especially where located on sustainable transport corridors. We would urge the Council to work with its West of Berkshire HMA constituent LPAs on this issue and to seek for a proportion of the unmet needs (as above) to be provided as larger units and family housing on sustainable sites close to Reading</p>	<p>No change proposed. The Council continues to engage with West Berkshire District Council under the duty to co-operate, and recognises the relationships across the boundary. However, it cannot identify land outside its boundaries for development, and whether or not this land is identified for development will be a matter for WBDC to lead on. As it stands, the land is not identified for development.</p> <p>Reading's existing shortfall was covered by both a Statement of Common Ground and Memorandum of Understanding with other authorities including West Berkshire. This is only relevant to the level of need identified in the adopted plan.</p> <p>As set out in the Reg 18 consultation, the Council's position is that based on the need of 735 homes there is no unmet need to be exported. Unmet need only arises if the standard methodology is used. Nonetheless, the Council has made a duty to co-operate request to other authorities including West Berkshire to understand the position regarding unmet needs if the standard methodology were to be used.</p>
<p>Darcliffe Homes</p>	<p>Our greatest concerns is the timing of the LPPU and the Government's on-going approach to planning reforms which will result in significant challenges for RBC. Whilst the LPPU is only a partial update, it is nevertheless subject to the timescales and transitional arrangements contained within the revised NPPF. NPPF Para 230 sets out that if Regulation 19 occurs after 19 March 2024 the policies within the revised NPPF will apply.</p>	<p>No change proposed. The government's message has been clear and consistent in that local planning authorities should proceed with plan making without delay. There has been uncertainty around planning reform for several</p>

	<p>It is clear that these will have significant implications on LPPU, the evidence base and approach will need to be revisited accordingly, particularly the Council approach to its housing needs and the urban uplift.</p> <p>See NPPF Para 62. Thus whilst it is noted that RBC consider a mismatch between the urban area of Reading noting that this includes areas such as Earley, Woodley, Calcot and much of Tilehurst which is beyond RBCs administrative boundary, the urban uplift requirement nevertheless applies in full to RBC. Lee Rowley (Minster of Housing, Planning and Building Safety) recently provided further clarification in his Written Ministerial Response dated 09/01/2024.</p> <p>We note that the most recent ONS figures published in January 2024 suggest a return to higher levels of population growth as was anticipated in the 2014-based projections. Importantly, the 2014-based projections were broadly consistent with achieving the target of 300,000 homes a year by the mid-2020s. This January 2024 update will place a renewed emphasis on the importance of planning for the standard method in line with the 2024-based projections, to support the Governments aspiration of delivering 300,000 homes a year.</p> <p>In accordance with NPPF Para 60 the overall aim should be to meet as much of an areas identified housing need as possible, including with an appropriate mix of housing types for the local community, within RBC administrative boundary. We are concerned by the initial suggestion of a local based figure of only 735 dpa, or a proposed capacity figure of approx. 800 dpa, up to 2041. However until such time as RBC Local Housing Needs assessment is published we are unable to comment further but nevertheless considered that RBC needs to be more ambitious in its approach.</p> <p>Given that RBCs immediate neighbours have previously agreed to offer support in accommodating RBCs unmet needs (in respect of Adopted 2019 requirement), although to date none have actually done so, RBC should again be seeking to work proactively with its close neighbours to see if any unmet need can be accommodated.</p>	<p>years and this is not a reason to hold up the Partial Update.</p> <p>The Housing Needs Assessment will be published alongside the Reg 19 consultation and this will outline the reason for the 735 per annum figure.</p> <p>The Reg 19 pre-submission draft proposes increasing the housing provision figure to 825 homes per year.</p> <p>The Council continues to work closely with its neighbours under the duty to co-operate, and this will be outlined in a full duty to co-operate statement.</p>
<p>Turley (OBO Oracle Limited Partnership)</p>	<p>More generally, in respect of the spatial strategy we note, the LPPU makes clear that Reading Borough Council is currently reviewing its approach to housing targets in consideration of the 35% uplift for the top 20 highest population urban areas. This work remains ongoing and is unpublished at the time of consultation, so Reading's housing needs remain unclear and we reserve right to make further comment on any requirements as this information becomes available. If there is an identified requirement for additional housing, we consider that the central area offers significant potential to accommodate housing growth, providing opportunity for sustainable and accessible residential communities contributing to the vitality and viability of the town centre. It should be ensured that other policies within the Local Plan are aligned to ensure that higher density residential development is supported.</p>	<p>The Housing Needs Assessment will be published alongside the Reg 19 consultation and this will outline the reason for the 735 per annum figure.</p> <p>The Partial Update contains significant growth within the town centre at a high density, and this is supported by relevant policies in the plan.</p>
<p>Bracknell Forest Council</p>	<p>It is agreed that the 35% uplift divorces the resulting figure from local need and that the most sensible approach is to commission evidence to understand the need for housing (rooted in local need). There would appear to be some support for this approach in the revised NPPF (para. 61) which refers to the standard method as an advisory starting point and that there may be exceptional circumstances to justify an alternative approach, which should also reflect future demographic trends and market signals. It is noted that initial findings of the commissioned work refer to 735dpa to 2041 whereas your 'HELAA' work is suggesting that there may be capacity to accommodate 800dpa to 2041.</p> <p>It is also stated that there is an intention to revisit the agreement between the Western Berkshire HMA Authorities, as the current SoCG only relates to the unmet need in relation to existing policy. At this stage, it is unclear what agreement would be sought, particularly in light of the NPPF December 2023 (para. 62) which refers to uplift being accommodated in the cities or urban areas themselves (except where there are voluntary redistribution agreements in place). BFC does not consider Bracknell Forest Borough to form part of the wider urban centre of Reading. Furthermore, the Bracknell Forest Local Plan (covering the plan period 2020-2037) is now at an advanced stage, with consultation on Proposed Main Modifications having ended in December 2023. It is hoped that the Inspectors' Report will be received shortly. The Plan identifies sufficient sites to meet the needs of Bracknell Forest over the new plan period with a little flexibility.</p>	<p>Noted. No change needed.</p> <p>The Pre-Submission Local Plan Partial Update does not seek to export any unmet housing need to other authorities, and agreement to this is not expected to be sought in a Statement of Common Ground. However, there are a number of strategic matters that are covered by the existing SoCG. It is expected that individual SoCGs will be sought with relevant authorities.</p>

	<p>The approach to increasing densities within Reading town centre to assist with meeting Reading Borough Council's (RBC's) housing need (Policy H2) is supported and reflects the revised NPPF (footnote 27) in relation to promoting effective use of land and optimising site densities.</p>	
<p>Woolf Bond Planning (OBO Fairfax Reading)</p>	<p>The Local Plan should seek to meet the Council's full housing need. However, we have identified flaws regarding the suggested plan period and consequently the Council's approach to ensuring sufficient land comes forward to meeting the wider development needs of Reading Borough. As we accept that it is unlikely that Reading borough can accommodate all its development needs, consistent with the obligations under the Duty to Cooperate, there must be engagement with all its neighbouring authorities to deliver solutions which contribute towards its resolution. As parts of South Oxfordshire are closest to the centre of Reading, especially when reviewing the undeveloped areas, these should be a focus for accommodating unmet need, in preference to the equivalent undeveloped parts of West Berkshire and/or Wokingham Borough.</p> <p>Our starting point is that we dispute the reasonableness and soundness of the proposed plan period and its consistency with the obligation to provide a strategic policy for at least 15 years post adoption³. Paragraph 4.1 of the Partial Update indicates that the requirement for the plan period is envisaged to extend from 2023 through to 2041. This allows for a one year buffer if there are delays in adoption of the Local Plan from the currently expected date of 2025 whilst still ensuring that it provides for the minimum 15 years post adoption required by NPPF paragraph 22.</p> <p>Whilst we endorse the use of the output of the Standard Method for determining the Borough's housing needs, we dispute the housing requirement as it does not relate to one which will provide for the full 15 years post adoption obligated by the NPPF.</p> <p>Alongside addressing a housing requirement over an appropriate plan period, we acknowledge the challenges of Reading borough in delivering growth, including its reliance upon neighbouring authorities. As explained, we consider that growth in South Oxfordshire should be promoted given its equal functional relationship to the town compared to locations in Berkshire and that in contrast to areas south of the River Thames it would entail shorter travel distances to reach the focus of services and facilities in the town centre and around the station.</p>	<p>The plan period is proposed to cover 15 years from adoption, as set out in response to that representation.</p> <p>As set out in the consultation, we do not consider that there will be unmet needs arising from Reading when based on the figures in the Housing Needs Assessment, and therefore there is no need to state a preference for where any unmet needs should be met. Work undertaken on the duty to co-operate with our neighbours will be outlined in the Duty to Co-operate Statement.</p>
<p>Woolf Bond Planning (OBO Fairfax Reading)</p>	<p>Paragraphs 2.12 and 2.13 of the draft Local Plan reference the emerging objectives for considering the Sustainability Appraisal for the forthcoming Local Plan. Whilst we have no comments on the provisional objectives listed it is important to reassess the approach of the plan and the extent that it demonstrates achievement of sustainable development.</p> <p>Our view is that the Council must seek to achieve at least the outcome of the standard method. Whilst our reasons for this are spelt out in this statement, it is important to highlight that currently no formal assessment of these options has been undertaken pursuant to The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended).</p> <p>Therefore no evidence that the implications of the different scenarios has been adequately considered, particularly that a higher growth does not support achievement of wider objectives. In the absence of this, we maintain that delivery of at least 877 dwellings annually should be the minimum targets.</p>	<p>The Sustainability Appraisal at Reg 18 stage assessed an option of delivering the standard methodology figure, and this continues to be the case at Reg 19 stage.</p>
<p>Lichfields (OBO USS Investment Management Ltd)</p>	<p>See Paragraphs 62 and 11a of the NPPF See PPG, Reference ID: 2a-033-20201216.</p> <p>Overall it is surprising that RBC are progressing the Regulation 18 draft of the emerging Local Plan without having published, and in some cases seemingly yet commissioned, key elements of the evidence base which will underpin the emerging Local Plan at Regulation 19 stage and subsequently. It will be necessary for subsequent iterations of the emerging Local Plan to be underpinned by a clear and transparent evidence base which is published in a timely manner. Ultimately it will be necessary for RBC to demonstrate that the Plan is "sound" when assessed against the relevant tests (NPPF para.35).</p>	<p>The Housing Needs Assessment will be published alongside the Reg 19 consultation and this will outline the reason for the 735 per annum figure.</p> <p>There is now a proposed update to policy CR10 in the Pre-Submission Local Plan Partial Update. Both Aquis House and 33 Blagrave Street are</p>

	<p>To date the evidence base which RBC contend supports the LPPU’s approach to housing need being below the standard method is considered to be extremely limited, whilst such needs assessments are further undermined by the absence of any published evidence on employment need, plan viability or residential capacity. On this basis, we conclude that the Council has not provided a clear and justified method for calculating housing need as required by footnote 19 of the NPPF, nor EC’s to which justify an alternative approach to assessing housing need.</p> <p>There are therefore no reasons for the emerging Local Plan to diverge from the clear direction provided by the NPPF to accommodate housing need based on the standard method including the related 35% uplift. In this context, our client’s view is that the LPPU should make an effective use of sites such as Aquis House and no. 33 Blagrove Street to contribute towards RBC’s housing need.</p> <p>These representations highlight the potential of the site to make a valuable contribution towards meeting housing need. We note that the Council require further assessment of the potential scale and design of development to assess the quantum of its potential delivery. Our client is undertaking feasibility analysis of these issues and is willing to share this information (which will be finalised following the current consultation) with RBC to assist the Council’s assessment of the site’s potential development capacity.</p> <p>Given the context of housing need outlined above, which is materially increasing from that within the adopted Local Plan, declining to review the approach outlined in policy CR10 represents a concerning omission.</p> <p>Conversely a review of policy CR10 has the potential to enhance residential delivery by making an effective use of sustainable sites in accordance with a central objective of the NPPF. This could in turn could make a notable additional contribution towards Reading’s housing need and would be a fundamental component in assessing whether RBC are able to demonstrate whether EC’s exist to which justify an alternative approach to assessing housing need.</p>	<p>identified as allocations for development or change of use, albeit there are particular constraints in those areas, in particular heritage, which constrain the likely development capacity.</p>
<p>Lichfields (OBO Tilehurst People’s Local Charity)</p>	<p>Overall it will be necessary for subsequent iterations of the emerging Local Plan to be underpinned by a clear and transparent evidence base which is published in a timely manner.</p> <p>It is clear that whatever suggested housing need figures is taken forward within the LPPU, the LPPU will need to plan for a significantly higher level of housing need than the RBLP. This heightens the importance of delivering effectively from sites already allocated (but not yet delivered) in the adopted RBLP such as WR3s and WR3t, together with finding new sites that can contribute towards RBC’s increasing need.</p> <p>Furthermore the NPPF (NPPF) sets out the Government’s clear objective of “significantly boosting the supply of homes” (NPPF para 60).</p>	<p>Noted. The Local Plan Partial Update plans for a significantly increased level of housing over the existing Local Plan.</p>
<p>Lichfields (OBO Packaged Living)</p>	<p>Overall it is surprising that RBC are progressing the Regulation 18 draft of the emerging Local Plan without having published, and in some cases seemingly commissioned, key elements of the evidence base which will underpin the emerging Local Plan at Regulation 19 stage and subsequently. It will be necessary for subsequent iterations of the emerging Local Plan to be underpinned by a clear and transparent evidence base which is published in a timely manner.</p> <p>The Government’s has a national housebuilding target to deliver 300,000 homes a year, but the national housebuilding target has never been met. Taking the past two years (2021-22 and 2022-23) as example, just over 234,000 homes were delivered each year, indicating a shortfall of about 60,000 homes per year.</p> <p>The NPPF sets out the Governments clear objective of “<i>significantly boosting the supply of homes</i>” (NPPF para 60). See NPPF Paragraph 61 and PPG, Reference ID: 2a-015- 20190220. The NPPF sets out the substantial role that urban centres (such as Reading) will be expected to play in meeting housing need, which underpins wider objectives of the NPPF related to</p>	<p>The Housing Needs Assessment will be published alongside the Reg 19 consultation and this will outline the reason for the 735 per annum figure, as will the Housing and Economic Land Availability Assessment setting out the full capacity.</p> <p>There is now a proposed update to policy CR10 in the Pre-Submission Local Plan Partial Update. 2 Norman Place is identified as an allocation for residential development.</p>

	<p>making an effective use of land. See Paragraphs 62 and 11a and b of the NPPF. This focus on urban centres is consistent with paragraph 11a of the NPPF which requires plans to apply a presumption in favour of sustainable development.</p> <p>See NPPF para 20 and 35</p> <p>The evidence base which RBC contends supports the LPPU's approach to housing need is considered to be extremely limited, and further undermined by any published evidence on employment need and plan viability. On this basis, the only conclusion can be that the Council has failed to provide a clear and justified method for calculating housing need as required by footnote 19 of the NPPF, nor EC's to which justify an alternative approach to assessing housing need. Neither does the Council outline any potential agreement with neighbouring authorities for redistribution of unmet need. There are therefore no reasons for the emerging Local Plan to diverge from the clear direction provided by the NPPF to accommodate housing need based on the standard method including the related 35% uplift, and to consider the opportunity to make an effective use of sites such as Norman Place to contribute towards this.</p> <p>Our clients concerns over the emerging approach to calculating housing need is further compounded by a lack of evidence related to housing capacity in the borough. The LPPU estimates maximum housing capacity to be around 800 homes per year, albeit provides no evidence to support this.</p> <p>These representations highlight the potential of the site to make a valuable contribution towards meeting housing need. This contribution could be in excess of the highest delivering development option assessed for the site during the LPPU Sustainability Appraisal (SA) of 240 units, and considerably beyond the SA's preferred delivery options for the (i) conversion to residential (for estimated 70-80 units) and (ii) development for 110-185 dwellings.</p> <p>Given the context of housing need outlined above, which is materially increasing from that within the adopted Local Plan, declining to review the approach outlined to policy CR10 represents a concerning omission.</p> <p>Conversely reviewing policy CR10 holds the potential to enhance residential delivery by making an effective use of sustainable sites in accordance with a central aspect of the NPPF. This could in turn make a notable additional contribution towards Reading's housing need, and would also be a fundamental component in assessing whether RBC are able to demonstrate whether EC's exist to which justify an alternative approach to assessing housing need.</p>	
--	--	--

Q. 28 Do you have any comments on how the issue of a shortfall in identified needs is proposed to be addressed? (This question relates to policy H1)

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	N/A	Compulsory purchase all housing stock, demolish & rebuild to a universal standard, in blocks, for ease of providing infrastructure. Tinkering around the edges is futile & wasteful, need a visionary plan & the bravery to implement it.	Do not agree. No changes proposed.
Adam Boulding	N/A	yes, regulate Airbnb's and short term lets. As to many other local authorities and cities, where short term lets and "Airbnb un-authorised hotels" are taking over and removing housing stock, foreign and distance buyers are buying up flats and homes with the sole intention to use as a hotel, through booking.com and Airbnb, operating hotels without any health and safety, permission from freeholders, no consideration of communities and neighbours, and removing hundreds of homes and apartments from the Reading area housing stock which should be owner occupier or rented. making rents more expensive and removing stock. Other cities and areas have now started to make policies to stop this, requiring hotel lets (short term lets such as Airbnb) to register with the local authority, provide evidence of insurance, electrical, fire and gas safety, permission from building owners or freeholders that a business and hotel can be let, and proof that they are paying the appropriate business licences and taxes on income to the government and local authority.	No changes proposed. Although comments are noted, the creation of short-term lets are not considered to be a proliferating issue within Reading that is affecting its housing stock to the extent that a policy to restrict growth is needed. Furthermore, central government are introducing planning measures to provide local

			<p>areas with more control over the future growth of short term lets, plus a new use class and associated permitted development rights which will help to address the issues as outlined in the representation.</p> <p>H&S and freeholder permissions are matters beyond the remit of planning policy. Any issues relating to noise and nuisance would be dealt with by the Environmental Health team.</p>
Henry Wright	N/A	<p>Higher density in suburban areas to include 3/4 storey Paris or Barcelona style apartments with mixed use shopping and offices where appropriate.</p> <p>Large scale redevelopment of existing council housing estates to increase density, improve quality of housing, provide more social housing than is currently available and increase the mix of residents in such developments to include more than just social tenants.</p>	<p>No changes proposed. Minimum density standards will be updated/increased under policy H2. However, density and housing type must appropriately integrate with the character of the area.</p> <p>Policy H14 sets out the approach for renewal and regeneration of Readings' suburban residential areas to improve the environment and housing stock.</p>
Christian Harris	N/A	They are not identified needs just some spreadsheet which can be manipulated	Do not agree, no changes proposed. The final proposed housing target figure will be the result of extensive evidence that has been commissioned by the council and is based on detailed capacity work as well as identifying local needs. These figures will be scrutinised by an independent planning inspector at examination to ensure that it is justified.
CADRA	N/A	See Q27 above.	See officer answer to Q. 27.
Montagu Evans (OBO Vintage Capital (No.3))	N/A	<p>It is incumbent on the Council to prepare a new assessment to determine the Plan period supply of deliverable and developable housing sites. Preparing an updated HELAA will identify additional suitable housing sites that should be put forward for allocation. Reading Bridge House for example was not assessed in 2017 (later assessed as part of the Call for Sites process) and is now coming to the end of its economic life and facing obsolescence due to increasing operational costs and vacancy in its current office use.</p> <p>Significant capital expenditure would be required to maintain the current services and a number of tenants have confirmed their intention to vacate the building, which will result in the building being over 70% vacant over the next 12-18 months. In our opinion the site is a peripheral location for office use given it is situated to the north of Reading Station and it is isolated from the core office cluster. Opportunities for refurbishment are also limited by the low floor to ceiling heights of the building that was designed in the 1960s. Despite this, its location in Reading Central Area makes it a highly sustainable location for residential and the Site is available for development in the early years of the Plan period (years 1-5). Meeting the forecast shortfall in the housing target will also necessitate a change in policy approach to minimum densities and safeguarding existing offices as we have explained above. This will enable Reading to provide a policy basis to deliver on its stated objective to deliver housing.</p>	<p>Answer is noted. An updated HELAA will be published in support of the LPPU.</p> <p>For further comments regarding Reading Bridge House see Q. 68.</p>
Louise Acreman	N/A	Yes. Build accommodation and create communities in areas where they have more land to cope with such development. I.e southern Scotland. Still close to transport hubs which link to areas with high employment (I.e technology in Edinburgh) but with more land to cope.	Do not agree. No changes proposed. This approach would deviate from national policy requirements.

RBC Private Sector Housing	N/A	It is not clear from the report on how this will be addressed.	Noted. No change needed.
Stantec OBO St Edwards Homes	N/A	If housing needs are to be properly addressed they should as far as possible be met where they arise. In this regard, the Council should allocate sufficient sites to accommodate housing needs in full. Land at Green Park Village, promoted by St Edward, could make a valuable contribution towards meeting needs, as is discussed further below.	Answer is noted. No changes proposed. The LPPU has commissioned work to establish what the latest needs for homes are, as well as the maximum capacity to accommodate this within the Borough boundary.
Montagu Evans (OBO Abrdn)	N/A	<p>It is incumbent on the Council to prepare a new assessment to determine the Plan period supply of deliverable and developable housing sites. Preparing an updated HELAA will identify additional suitable housing sites that should be put forward for allocation, but this need to be based on an open and fresh review of these sites rather than simply re-imposing previous allocations.</p> <p>However, in relation to existing site allocations the current policy position on building heights is providing an artificial cap to housing density. The tall building policy CR10 prevents buildings from exceeding 10 storeys (office) and 12 storeys (residential), or equating to 36 metres in height outside of the limited areas defined for tall buildings.</p> <p>The policy does not account for substantial allocated sites where greater articulation in building heights would be welcomed. In order to address this the council should review the policy via a new townscape analysis, and address the arbitrary limit to density. This would improve housing delivery on existing allocated sites.</p>	<p>No changes proposed. A new HELAA assessment has been prepared as a part of the LPPU.</p> <p>Policy CR10 is proposed to be updated. However, the tall buildings policy does not necessarily prevent high density development from being achieved, and tall buildings are not appropriate on every site.</p>
Savills (OBO John Lewis Partnership)	N/A	<p>See NPPF para 129 and 62</p> <p>On this basis, it is particularly important that the Council seeks to deliver all of its identified local housing needs within the borough (and within Central Reading as the most sustainable location for new development in the borough) by seeking to optimise the potential of sustainable sites. It is considered that a positive approach should therefore be taken to appropriate higher-density development on sustainable brownfield sites, such as at the JLP Mill Lane site.</p>	No changes proposed. The Council seeks to deliver identified local housing needs within the borough boundary insofar as possible. The Town Centre is likely to make up the majority of housing delivery over the plan period.
Savills (OBO Sorbon Estates Ltd)	N/A	<p>To maximise opportunities to address a shortfall in housing needs, the LPPU should be ambitious in its approach to previously developed sites and maximising the density they can deliver. See Paragraph 123 of the NPPF. This is discussed further in Question 29 below.</p> <p>See Paragraph 62 of the NPPF and the Planning Practice Guidance (PPG) – Housing and economic needs assessment (Paragraph: 035 Reference ID: 2a-035- 20201216). Therefore, the LPPU should be seeking to accommodate as many homes as possible within Reading.</p>	No changes proposed. The Council seeks to deliver identified local housing needs within the borough boundary insofar as possible. All new sites put forward are situated on previously developed land.
M Langshaw	N/A	If adjacent Local Authorities are less densely populated could they allow more housing? But with a green zone around Reading? To avoid continuous Los Angeles type sprawl all around Reading....	The NPPF requires LPA's to meet their housing needs. Housing is allowed subject to compliance with relevant development plan documents. Paragraph 24 of the NPPF confirms that LPA's are under a duty to cooperate with each other on strategic matters that cross administrative boundaries. Paragraph 26 states that cross-boundary matters such as development needs being met elsewhere should be dealt with via joint working.

Q. 29 Do you agree with the proposed update to policy H2 to incorporate minimum densities?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	Density standard Nationally? Should be a universal national standard.	No change proposed. Reading is required to set its own standards.
Adam Boulding	N	minimum densities should not be set, you should allow for ore green spaces and other use	Do not agree. No changes proposed. Incorporating such would deviate from national policy requirements.
Henry Wright	N	Set higher minimum densities in line with the alternative proposed option.	Partially agreed. Proposed minimum densities have been increased for town centre and suburban sites to reflect a 30% increase in existing density.
Christian Harris	N	Reading is already over dense. Bear in mind we are a town of as you quote approximately 165000 so unless you include surrounding areas not relevant to reading you are exaggerating the need	No changes proposed. The housing need figure is a result of extensive evidence discerning local need/capacity.
Paul Oliver James Melville	N	dense developments may lead to more crime in those areas.	No changes needed. Density does not necessarily lead to more crime, and in some cases may reduce crime due to more visibility from residential properties. Existing policy CC7 stipulates that new environments (including high density) must be designed in such a way such that it is safe and accessible, ensuring that crime and disorder or fear of crime does not undermine quality of life or community cohesion. Updates to policy CC7 within the Partial Update include the requirement for proposals to ensure that they are easy to navigate, safe and accessible.
Anthony Acka'a	Y	With limited space to build, we need to build densely, living in a dense town will improve ridership on public transport, increase active transportation, reduce dependence on cars, make house prices more affordable and make Reading greener and cleaner.	Answer is noted. Proposed minimum densities have been increased for town centre and suburban sites to reflect a 30% increase in existing density.
CADRA	Not Answered	<p>We have significant concerns over the application and interpretation without further clarification.</p> <ul style="list-style-type: none"> • How will the areas be defined? • How will high frequency bus stop be defined? We urge that it should not include stops served by an hourly bus service with limited evening and weekend service. • Several district and local centres are traditional village centres with heritage importance. <p>We strongly support the proposal that <i>“a set of criteria for considering exceptions be included, to include matters such as the presence of heritage assets or sensitive landscapes or townscapes, unacceptable impacts on residential amenity and any impacts on delivering the necessary mix of sizes of dwelling.”</i></p>	<p>Partially agreed. The proposed policy now removed the distinction between different types of urban area in recognition of likely difficulties in interpretation and the fact that urban areas are almost always highly accessible by public transport.</p> <p>The proposed approach also now includes a set of exception criteria.</p>
Montagu Evans (OBO Vintage Capital (No.3))	Y	Yes, we endorse the Council's proposed approach to incorporate minimum densities, especially in the town centre and areas well served by public transport. This is important for site optimisation and in the light of the forecasted housing supply shortfall.	Change proposed. It is agreed that 200 dph would not result in a significant uplift in the town centre, as the current average density is

		<p>Focusing on the town centre, the Council appears to have set the minimum density based on the average density of the town centre as a whole. This is at odds with the Council's actual policy approach on assessing density as part of its consideration of a planning application, which applies a site specific dwellings per hectare assessment. Using the average density of consented schemes that have been constructed over 2013 to 2023 represents a more reasonable basis for determining an appropriate minimum density for developments to achieve in the town centre. This would respond to national policy, where the Framework expects minimum standards to result in a "significant uplift" in the average density of residential development. This would not be achieved by simply introducing a minimum density reflecting the average density of the town centre.</p> <p>We recommend that the Council updates its policy approach accordingly so that the Plan can be found justified and effective. Uplifting the minimum density to 334 dph would also ensure the Plan is positively prepared, by enabling Reading to meet its objectively assessed needs for housing. For consistency purposes the Council must also update Policy CR10 (Tall buildings) to reflect the likely change to the pattern and scale of development through following the minimum densities approach. For example, Reading Bridge House is located adjacent to the boundary of the tall buildings policy area in the 2019 Local Plan, despite already meeting the definition of a tall building (10 storeys or more), which was based on the recommendations of the Council's Tall Buildings Study that was published in 2008. Evidently Policy CR10 must be updated to extend the areas of Reading where tall buildings may be found acceptable in light of the housing requirement, but also the prevailing character of Reading where a number of tall building developments have been constructed which means the 2008 evidence base can no longer be relied upon to identify tall building locations.</p>	<p>around 199 dph. It is therefore proposed to increase this to 260 dph (a 30% increase).</p> <p>The Council's view is that the NPPF requires standards that seek a significant uplift in average density of residential development, not recent residential development. However, recent development is taken into account as part of that, and is particularly significant for deriving a figure due to the fact that so much of the residential stock in the town centre is recently constructed. The plan seeks a 30% increase in this average density.</p> <p>The density of 334 dph is a recent average in the town centre, and it stems from the fact that development in central Reading is already being carried out at high density to make the most of its accessibility and sustainability, based on local policies already in existence. It is not considered that recent averages, whilst they may be useful as a baseline for what an existing site could deliver, would be an appropriate minimum as in most cases they reflect a figure close to the maximum of what those individual sites can deliver. It should be borne in mind that there is considerable difference in character across the centre of Reading, and minimum densities should reflect that.</p> <p>An update to policy CR10 is now proposed.</p>
Louise Acreman	N	H2, I don't think we should be increasing the density. By increasing the density it will put pressure on overburdened communities and stores up health issues further down the line.	Do not agree, no changes proposed. Uplifting density is in accordance with national policy.
Damians Bramanis	Other	I believe that there should be both maximum and minimum bounds for density. I've viewed a number of new build properties near the town centre and in urban areas of Reading, and found them claustrophobic and under-sized. I believe this is directly caused by property developers attempting to maximise the number of dwellings in a given space, and has caused a significant decline in quality of residential spaces.	No changes proposed. It is agreed that there is a risk that overdevelopment of sites can cause issues in terms of residential amenity, but the minimum densities have been set at levels that have been regularly achieved without such impacts, and there are other policies that deal with this matter.
RBC Private Sector Housing	Other	We would expect to be mindful of the implications of higher densities like the need for better sound insulation between flats/apartments and consider improvements to soundscapes within the higher density areas due to mixed land uses.	Answer is noted. For town centre development, where there is more high density development and mixed land uses, addressing noise and disturbance is already covered in policy CR6(ii).
CAAC	N	The boundaries of the areas defined as 'town centre', 'highly accessible urban sites', 'other urban sites' and 'suburban sites' in Reading make it difficult to respond to this question constructively.	Partially agreed. The proposed policy now removed the distinction between different

		<p>Whilst the table of average densities given (presumably these are for Reading) give a benchmark of where Reading is currently the insertion of the fourth 'highly accessible urban sites' is problematic as there is no benchmark against which this can be compared and this should have been supplied within the update.</p> <p>A definition of 'high frequency public transport stop' should have been included (it only appears in this paragraph). Reading has a very good bus service but not all routes are equally served and not all run 24 hours a day. Reading's one way road system also adds complexity to the calculations. Will consideration be given to Reading's four railway stations? We are not aware that these four types of density are within the NPPF. The reference to paragraph 125 may refer to an older version of the NPPF and could have been replaced by paragraph 129 which is not very specific as to areas required?</p> <p>The boundaries of the 'town centre' and district and local centres could be inferred from the maps within the New Local Plan. Leaving aside the town centre as a special case, our opinion is that the district and local centres generally reflect the areas around them in density. Exceptions would be retail parks developed on brownfield sites such as Battle Hospital on Oxford Road, Morrisons/Aldi/Brunel Retail Park on Basingstoke Road/Rose Kiln Lane. Consequently we would not like to see this category open the way to higher density within Reading's 'urban' or 'suburban' sites that goes beyond the local context. Paragraph 130 of the NPF seems to support our opinion.</p> <p>The inclusion of the additional category also has the potential to impact many of Reading's CAs which include or are adjacent to a 'highly accessible urban site' e.g. Christchurch Green shops are opposite Redlands CA and in close proximity to The Mount CA. Whilst higher density development may not be allowed because of the 'heritage asset' exemption it is an unnecessary complication in the planning process for Reading.</p>	<p>types of urban area in recognition of likely difficulties in interpretation and the fact that urban areas are almost always highly accessible by public transport.</p>
McConnell Planning (OBO Elstree Homes)	Y	<p>Elstree support the proposed changes to minimum densities with the additional categories of town centre and highly accessible urban sites to the more generic categories of urban and suburban being a welcome addition. This approach can positively support increased delivery of housing in sustainable locations through higher density developments where good access to facilities and transport links prevail. It is not considered necessary to include a list of exception criteria to density considerations as these criteria will be covered through other policies in the plan, for example impact upon residential amenity or heritage related considerations.</p>	<p>No changes proposed. Caveats are to be introduced due to difficulty in applying this policy in practice given the variability between sites (such as the presence of heritage assets). Therefore, explicit reference where there are sensitivities is required to ensure such factors are taken into consideration.</p>
Historic England	Y	<p>We welcome the inclusion of potential exceptions to the stated minimum density and reference to sensitivities such as heritage assets. As reflected in the latest iteration of the NPPF (December 2023) and the accompanying government's consultation outcome, design needs to be informed by local context and character. This will also connect with the Council's future work on design coding.</p>	<p>Answer is noted. No changes required.</p>
Savills OBO Viridis	No answer	<p>See Paragraph 129 of the NPPF. The LPPU seeks to apply minimum density standards in Policy H2 in line with Paragraph 129 a) of the NPPF, which is supported. We note that the Council should revisit its policy on 'tall buildings' in order to deliver higher densities, so the two policy approaches will need to be consistent in order that they work together to achieve the Local Plan vision and objectives.</p>	<p>Noted. No change proposed. It is not proposed to update policy CR10.</p>
Opus Works (OBO AEW and McLaren (Broad Street Mall))	Other	<p>This update to Policy H2 is supported in principle as it will better help to ensure that the Council makes the effective and efficient use of highly sustainable sites which are themselves finite land resources. The approach accords with Paragraph 124 (c) of the NPPF. However, it is important that the Council ensures that increased densities are reflective of their surroundings, supporting significant increases in density within the 'areas of potential for tall buildings' as set out at Policy CR10 and on the Council's Proposals Map, and where there is identified ability to accommodate this in an acceptable manner, supported by appropriate technical due diligence. As set out in our response to Q27, increasing the density of existing allocations will reliably ensure that the Council can meet its increased housing requirement which will come through the update to Policy H1, and the Council should be reviewing the capacity of all existing allocated sites in light of this.</p>	<p>Noted. The capacity of existing allocations has been reviewed and in many cases increased. The proposed policy continues to make clear that, subject to minimum densities, the appropriate density will be dependent on a range of factors.</p>

Opus Works (OBO British Estates Services Ltd)	No answer	The update to Policy H2 is supported in principle as it will better help to ensure that the Council makes the effective and efficient use of highly sustainable sites which are themselves finite land resources. The approach accords with Paragraph 124 (c) of the NPPF. However, it is important that the Council ensures that increased densities are reflective of their surroundings, and that where sites are relatively self-contained, as is the case for Site Wes3, it may be appropriate to accommodate higher densities, subject to this being supported by appropriate technical due diligence.	Noted. The proposed policy continues to make clear that, subject to minimum densities, the appropriate density will be dependent on a range of factors.
Savills (OBO Elder)	Y	We support the proposed update to incorporate minimum densities to direct the highest densities to town centre locations. This will ensure development sites make the best use of land and do not undersupply on housing delivery.	Answer is noted. No changes required.
Opus Works (OBO Moda Living)	Other	The change to policy is supported. However, it is important to ensure that densities are reflective of their surroundings and therefore significant increases in density should be supported on sites within the Tall Buildings Zones and in locations where a case can be made where there is ability to accommodate further quantum where this is underpinned by robust environmental and townscape assessment.	Noted. Uplifts in density are supported on many of the existing allocated sites within the plan and this is supported by proposed changes to H2.
Opus Works (OBO AEW Core Plus Property Fund)	No answer	This update to Policy H2 is supported in principle as it will better help to ensure that the Council makes the effective and efficient use of highly sustainable sites which are themselves finite land resources. The approach accords with Paragraph 124 (c) of the NPPF. However, it is important that the Council ensures that increased densities are reflective of their surroundings, supporting significant increases in density within the 'areas of potential for tall buildings' as set out at Policy CR10 and on the Council's Proposals Map, and where there is identified ability to accommodate this in an acceptable manner, supported by appropriate technical due diligence.	Noted. The proposed policy continues to make clear that, subject to minimum densities, the appropriate density will be dependent on a range of factors.
Stantec (OBO Aviva Life & Pensions Ltd))	Y	Our client supports the proposed amendments to Policy H2 which replace density ranges with minimum densities, which will allow flexibility for development to achieve higher densities in sustainable locations such as at the Reading Station Retail Park site.	Answer is noted. No changes required.
Opus Works (OBO Mapledurham Properties Ltd)	No answer	This update to Policy H2 is supported in principle as it will better help to ensure that the Council makes the effective and efficient use of highly sustainable sites which are themselves finite land resources. The approach accords with Paragraph 124 (c) of the NPPF. However, it is important that the Council ensures that increased densities are reflective of their surroundings, supporting significant increases in density within the 'areas of potential for tall buildings' as set out at Policy CR10 and on the Council's Proposals Map, and on other sites, such as Cen9 where there is a clear, identified ability to accommodate this in an acceptable manner, supported by appropriate technical due diligence. As set out in our response to Q27, increasing the density of existing allocations will reliably ensure that the Council can meet its increased housing requirement which will come through the update to Policy H1, and the Council should be reviewing the capacity of all existing and proposed allocated sites in light of this.	Noted. The capacity of existing allocations has been reviewed and in many cases increased. The proposed policy continues to make clear that, subject to minimum densities, the appropriate density will be dependent on a range of factors.
Montagu Evans (OBO Abrdn)	Y	<p>Yes, we very much welcome the Council's review of density guidance and to seek to establish minimum densities. The previous minimum density guidance has been shown to be a significant underestimate of capacity limiting the ability to deliver high quality homes at appropriate densities.</p> <p>We welcome the inclusion of highly accessible urban sites, which largely captures the majority of allocated Focusing on the specific minimum densities proposed, it appears that the Council are proposing minimum densities which remain too conservative compared with average densities that have been delivered. This reflects the lack of an updated evidence base. Using the average density of consented schemes that have been constructed over 2013 to 2023 represents one basis for determining an appropriate minimum density for developments. This would respond to national policy, where the Framework expects minimum standards to result in a "significant uplift" in the average density of residential development. This would not be achieved by simply introducing a minimum density reflecting the average density of the town centre.</p> <p>We recommend that the Council updates its policy approach accordingly so that the Plan can be found justified and effective. Uplifting the minimum densities as follows:</p> <ul style="list-style-type: none"> Town centre – Above 300 dwellings per hectare; 	<p>Change proposed.</p> <p>It is agreed that 200 dph would not result in a significant uplift in the town centre, as the current average density is around 199 dph. It is therefore proposed to increase this to 260 dph (a 30% increase).</p> <p>It is worth noting that, whilst high densities have been achieved within the town centre, there remains a considerable variation in character due to the presence of conservation areas and remaining areas of terraced housing, and the average of what has been achieved does not represent an appropriate minimum. The policy emphasises that 260 dph is very much a minimum, and the actual</p>

		<p>The above 200 density figure is arbitrary and not justified.</p> <p>An alternative is to introduce an Opportunity Area specific minimum density would avoid the current disconnect between Policy H2 and the relevant Site Allocations.</p> <p>Overall the proposed minimum densities above would ensure that the Plan is positively prepared and facilitate a more constructive environment for Reading to meet its objectively assessed needs for housing. As well as meeting the national objectives of the NPPF, including making the most efficient use of land (paragraph 128 of the NPPF). However, minimum densities should not be the sole measure to guide development and housing delivery. The tall building policy CR10 should also be updated to reflect a more evidence-based approach. The current height limits should be replaced by a more townscape-based approach informed by detailed townscape analysis across Reading and at the Site Allocations, allowing density to come forward in appropriate locations. This will also reflect the likely change to the pattern and scale of development through following the minimum densities approach.</p>	<p>appropriate density above that level will depend on a range of factors.</p> <p>It is not considered that opportunity area level densities are necessary when each allocation contains a dwelling range.</p>
Savills (OBO Sorbon Estates Ltd)	No answer	<p>See Paragraph 129 of NPPF.</p> <p>It is considered that the proposed minimum densities for 'Highly accessible urban sites' and 'Other urban sites' which proposed minimums of 100 and 70 dwellings per hectare (DPA) respectively, could be more ambitious, particularly given Reading's growth aspirations and the Local Plan 2019 Visions and Objectives. It is not clear from Table 8.1 how the proposed densities have been derived, particularly when the average densities achieved between 2013 and 2023 have been significantly greater.</p> <p>In this context, Table 8.1 identifies that the average densities in the Town centre achieved within the plan period to date have been 334 dph in the Town centre; 116 dph in the Urban area and 45 dph in the Suburban area.</p> <p>The proposed minimum densities in H2 do not represent a 'significant uplift' of the average existing or achieved densities set out in Table 8.1 and therefore, should be higher than currently being proposed, in line with the NPPF.</p> <p>Furthermore, there needs to be flexibility built into the policy particularly for urban sites outside the town centre, to accommodate higher density through good design, where appropriate. Site SOU1 – Reading Link, is a highly accessible urban site, very close to the town centre and based on site-specific circumstances, can likely accommodate housing at a higher density than the averages set out for the urban area in Table 8.1.</p>	<p>Change proposed. It is proposed to remove the distinction between types of urban sites, with a 100 dph minimum applicable for all sites. However, it is also important to realise that the broad classes of town centre, urban and suburban areas represent quite wide variations in character, and the average of what has been achieved in recent years in such areas does not necessarily represent an appropriate minimum. There is considerable scope within the policy to increase densities if the conditions of the site allow.</p>
Iceni (OBO TT Group)	Other	<p>TTG agrees that higher minimum densities should be set for different parts of the Borough. However, it must be made clear that these densities are a minimum, rather than a target to be met. It is important for development sites to be considered on a case-by-case basis and for development to be optimised, particularly on previously developed land in sustainable locations.</p>	<p>Answer is noted. The proposed policy makes clear that appropriate densities may be well above the minimum.</p>

Additional representations submitted via email regarding density

Respondent name	Comments	RBC Officer Response
VOWH & SODC	The Local Plan partial review could consider revising the tall buildings policy (CR10) in order to support RBC's future housing needs by increasing the vertical capacity for increased housing density.	Noted. Policy CR10 is proposed to be updated.
Lichfields (OBO USS Investment Management Ltd)	<p>See NPPF paras 60, 123, 129 and 130</p> <p>Our client concurs that it is necessary to review policy H2 to achieve consistency with the NPPF approach, and specifically the emphasis on making an effective use of urban centres.</p>	Change proposed. It is agreed that 200 dph would not result in a significant uplift in the town centre, as the current average density is around 199 dph. It is therefore proposed to increase this to 260 dph (a 30% increase).

<p>More specifically minimum densities standards should be outlined in the LPPU that seek a significant uplift in the average density of development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. The approach set out within the LPPU proposed approach for policy H2 is unambitious and does not achieve this.</p> <p>The proposed minimum figure of 200 dph is almost the same as the existing average density in the town centre (199 dph). It is also substantially lower than the average density achieved via new build residential development in the town centre over the past decade (334 dph).</p> <p>The approach proposed within LPPU policy H2 is not consistent with the NPPF’s approach to seek significant uplifts in the average density of residential development (unless it can be shown that there are strong reasons why this would be inappropriate). This is of particular importance given the increased housing need within RBC as recognised in the LPPU.</p> <p>No detailed evidence of the Council’s capacity to accommodate residential development is provided within the LPPU, and no specific reasons at all have been presented to demonstrate significant uplifts in density would be inappropriate, as required by NPPF para 129. As previously highlighted, the LPPU is not proposing to review the approach to tall buildings, and therefore what role suitable and available sites could play in contributing to enhance residential delivery through tall buildings.</p> <p>The proposed approach fails to optimise the use of land and in turn does not fully consider the potential for Reading to meet as much of the identified need for housing as possible. There are clearly concerns that this emerging approach would not be consistent with requirements for plans to be positively prepared, and consistent with national policy in order to be found sound.</p> <p>Previous sections have highlighted concerns over LPPU’s approach to calculating housing need. They have also highlighted that LPPU will be required to present EC’s if the LPPU’s suggested approach is followed, or any other approach which does not follow the standard method. In this context it is necessary to review the Council’s tall buildings strategy (and subsequently policy CR10) in exploring further opportunities to accommodate RBC’s increasing housing need. It would also be consistent with the NPPF’s emphasis on achieving appropriate densities, as set out above.</p> <p>In this context, our client questions the LPPU’s conclusion that policy CR10 related to Tall Buildings is “<i>up-to-date and...not proposed to be updated</i>” (LPPU, para 12.2). This conclusion appears to be entirely contradictory to both the NPPF and RBCs clear increased need for housing.</p> <p>Conversely our client considers that there is a clear requirement for the LPPU to review the Reading Tall Building Strategy (2008) and policy CR10 in the adopted Reading Borough Local Plan (RBLP) (2019) in order to be considered up to date. The Reading Tall Building Strategy Update Note (2018) was produced in the context of a previous version of the NPPF (which it refers to). The LPPU recognises the need to update policy H2 (related to density) to bring it in line the NPPF’s approach to density, and reviewing the Tall Building Strategy (TBS) should be an integral part of this exercise.</p> <p>Having established the necessity of the LPPU revisiting RBC’s tall building strategy and the current RBLP policy CR10, these representations briefly comment on RBC’s earlier analysis of the scope for part of the site to accommodate a tall building.</p> <p>The initial Reading TBS (2008)⁴ predates the original NPPF. Within the TBS, part of the site (Aquis House) was included within the area for “<i>Preferred Tall Building Locations</i>” (page 39) (see figure 2 below, Station Area Cluster). The Reading TBS went on to note that the part of the cluster (which included part of the site -Aquis House) in the “<i>Character Area 1: Station Hill</i>” was identified as “<i>having a high capacity for the development of further tall buildings. There is a good level of market demand for the site and it is a sustainable location in terms of transport provisions</i>” (TBS, 2008, p. 30)</p> <p>Ultimately the RBLP (and preceding plans) progressed with a smaller Tall Building Cluster around Reading Station.</p>	<p>The Council’s view is that the NPPF requires standards that seek a significant uplift in average density of residential development, not recent residential development. However, recent development is taken into account as part of that, and is particularly significant for deriving a figure due to the fact that so much of the residential stock in the town centre is recently constructed. The plan seeks a 30% increase in this average density.</p> <p>The density of 334 dph is a recent average in the town centre, and it stems from the fact that development in central Reading is already being carried out at high density to make the most of its accessibility and sustainability, based on local policies already in existence. It is not considered that recent averages, whilst they may be useful as a baseline for what an existing site could deliver, would be an appropriate minimum as in most cases they reflect a figure close to the maximum of what those individual sites can deliver. It should be borne in mind that there is considerable difference in character across the centre of Reading, and minimum densities should reflect that.</p> <p>An update to policy CR10 is now proposed.</p>
---	---

	<p>An update note on the Reading Tall Buildings Strategy was produced in 2018 which concluded that the “<i>overall evidence and approach that was set out by the TBS and resulting RCAAP policy is still generally valid</i>” (para. 7.2, page 21). More recently RBC’s Sustainability Appraisal (SA) which underpins the LPPU has given brief consideration of this matter. The SA assesses a development option for the site comprising a ‘Tall Building’ (10-15 storeys) and concludes that a Tall Building would have equal positive and negative effects compared to a development option that is limited to being below the Tall Building threshold (less than 12 storeys).</p> <p>The SA subsequently notes regarding these options, that “<i>a decision on which option should be carried forward would be better assessed once there is greater detail on how many housing numbers each option could deliver, as well as proposed design.</i>” (SA, p. 156)</p> <p>The results of the SA’s analysis relating to a ‘Tall Building’ at the site support our client’s contention that a review of the Tall Building Strategy (including the spatial extent of tall building clusters) and policy CR10 is both justified and required.</p>	
<p>Lichfields (OBO Packaged Living)</p>	<p>See NPPF paragraphs 123, 129 and 130.</p> <p>Our client concurs that there is a need to review policy H2 to achieve consistency with the NPPF approach, and specifically the emphasis on making an effective use of urban centres. More specifically minimum densities standards should be outlined in the LPPU that seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. The approach set out within the LPPU proposed approach for policy H2 does not achieve this.</p> <p>The proposed minimum figure of 200 dph is almost the same as the existing average density in the town centre (199 dph). It is also substantially lower than the average density achieved via new build residential development in the town centre over the past decade (334 dph).</p> <p>The approach proposed by LPPU policy H2 would not be consistent with the NPPF’s approach to seek significant uplifts in the average density of residential development (unless it can be shown that there are strong reasons why this would be inappropriate), which is of particular importance given the Council’s increasing housing need within the LPPU.</p> <p>Central Reading is well served by public transport, and the site at Norman Place has excellent access to transport nodes and facilities in the town centre. Reading station is the second busiest interchange station outside of London.</p> <p>No detailed evidence of the Council’s capacity to accommodate residential development is provided within the LPPU, and no reasons at all have been presented to demonstrate significant uplifts in density would be inappropriate, as is required by NPPF para 129. As previously highlighted, the LPPU is not proposing to review the approach to tall buildings, or therefore what role suitable and available sites could play in contributing to enhance residential delivery through tall buildings. The proposed approach fails to optimise the use of land and in turn does not fully consider the potential for Reading to meet as much of the identified need for housing as possible. There are clearly concerns that this emerging approach would not be consistent with requirements for plans to be positively prepared, and consistent with national policy in order to be found sound.</p>	<p>Change proposed. It is agreed that 200 dph would not result in a significant uplift in the town centre, as the current average density is around 199 dph. It is therefore proposed to increase this to 260 dph (a 30% increase).</p> <p>The Council’s view is that the NPPF requires standards that seek a significant uplift in average density of residential development, not recent residential development. However, recent development is taken into account as part of that, and is particularly significant for deriving a figure due to the fact that so much of the residential stock in the town centre is recently constructed. The plan seeks a 30% increase in this average density.</p> <p>The density of 334 dph is a recent average in the town centre, and it stems from the fact that development in central Reading is already being carried out at high density to make the most of its accessibility and sustainability, based on local policies already in existence. It is not considered that recent averages, whilst they may be useful as a baseline for what an existing site could deliver, would be an appropriate minimum as in most cases they reflect a figure close to the maximum of what those individual sites can deliver. It should be borne in mind that there is considerable difference in character across the centre of Reading, and minimum densities should reflect that.</p>

		Detailed evidence regarding the Council's capacity to accommodate residential development is to be published alongside the Reg 19 consultation.
--	--	---

Q. 30 Do you agree with the proposed increased focus on family housing in policy H2?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	Everyone should have a right to a roof over their head.	Noted. No change needed within the context of policy H2.
Adam Boulding	N	I dont agree it is needed to be a part of the policy, it should be based on supply and demand to allow for future demographic evolutions	No changes proposed. Within Reading, there is a significant need (demand) for family housing. The proposed updates to annual housing targets (set out within policy H1) is based on a mixture of local need (demand) and available capacity (supply). The updated size and type of housing proposed within policy H2 (including a greater focus on family housing) must, overall, align with the overarching housing figure set out in policy H1, which is based on extensive evidence and background research, including demographic trends.
Henry Wright	Other	Yes - if possible the minimum density should be able to met by a number of bedrooms per hectare rather than a dwelling figure, if this figure is the same or higher. This would allow for 3 bed properties to meet the need despite being less dense.	No changes proposed. This approach could risk new developments failing to meet minimum density standards as required by the NPPF and is not intended to preclude family sized dwellings coming forward.
Christian Harris	Yes	Houses with gardens	No change needed. Due to the urban nature of the borough, high-density development (such as flats, with communal open space) is often required to suit the needs of the residents, as well as to meet housing targets. Adopted Policy H10 sets out requirements for private and communal outdoor space for dwellings. This policy does not comprise part of the LPPU and therefore can be referred to for domestic amenity standards and requirements.
Debbie Sadler	N	Your report highlights the nature of the aging population. Flats are not always suitable for elderly people. In addition to family houses, consideration should also be given to providing homes for elderly couples/individuals.	No changes needed. Policy H6 addresses accommodation for vulnerable people and comprises part of the LPPU. Work is currently underway to assess the needs for housing for particular groups, including elderly people and those in need of care. This will generate

			a new 'need' figure that will replace the existing one to ensure sufficient supply.
Reading Climate Action Network	Other	Please consider a type of provision I believe has been overlooked. Many older people would like to down-size to a smaller, easier to manage property but do not do so as the options are so limited. Most existing bungalows are tiny, and not attractive to those in their 60's and 70's who are still active. Many people also don't want to leave the areas where they live simply to find a suitable house. Custom designed developments for older people with reasonable accommodation, community areas etc would be hugely welcomed and would enable the release of many large family homes to those younger families who so desperately need them. This would be so much easier than trying to shoe-horn more 3 and 4 bedroom homes into limited space.	No changes proposed. The Housing Needs Assessment has considered the types of housing need for different groups which informs the proposed requirements.
Paul Oliver James Melville	Y	see above	See officer response to Q. 29.
Anthony Acka'a	Other	I mostly agree but I think family housing should only take priority over density in the suburbs but density should always be prioritised in the town centre as this is where space is most limited.	No change proposed. As the town centre is likely to make up the majority of housing delivery, a greater mix of housing is proposed here, albeit the % is not as high as dwellings outside of the town centre.
CADRA	Y	Yes, we support the proposal for much needed family housing. This is needed to increase supply and to counterbalance the developer preferences for one and two bed homes. But it must consider living conditions for families.	No changes proposed. Living conditions are already governed by existing policies.
Montagu Evans (OBO Vintage Capital (No.3))	Not answered	We endorse this policy approach in principle so that suburban areas are the focus of where family housing should be located in policy terms. However, we remind the Council that its Plan must be prepared in a way that is aspirational but deliverable and contain policies to optimise the use of land in the Borough. In our opinion implementing this policy approach could conflict with the Framework in these respects.	It is unclear how implementation would conflict with the NPPF.
Louise Acreman	Other	Yes, we need less high density flats and more family housing	Noted. No changes proposed.
Abri	N	In response to question 30, we do not agree at this time that the intended policy changes will deliver more family housing across Reading, but may reduce the quantum of affordable housing that can be delivered in high density areas. There is a clear conflict between the intended increase in housing densities and this aim, as larger family housing is more challenging to deliver to a high standard and with acceptable amenity space in flatted developments. To understand the potential impacts of the intended changes the Council should provide a viability assessment and the Housing Needs Assessment (noted as underway) as the SHMA is now quite dated for these purposes. Further consultation should be undertaken with RP partners as part of both assessments.	Noted. No changes proposed. This matter will be considered as a part of the viability assessment.
Damians Bramanis	Y	Yes, I think this is very important.	Answer is noted. No changes required.
RBC Private Sector Housing	Y	Yes - should assist with overcrowding issues. The location of family housing should be considered. The facilities and amenity space. There can be conflicts with other town centre uses which can generate complaints if not mitigated.	No changes proposed. This matter is already covered by existing policy CR6(ii).
McConnell Planning (OBO Elstree Homes)	Other	The need for additional family housing in Reading is not disputed. However, it should be acknowledged that there is a need for all types of accommodation within the town. An over emphasis on the delivery of family housing can have a negative impact upon the quantity of housing being delivered and also result in family housing being delivered in locations that may not be considered entirely suitable for family housing. This applies in particular to those locations where higher densities are sought. In such locations, an overemphasis upon family housing will conflict with the objective of delivering higher densities. By reducing the focus upon family housing in such locations will not undermine the delivery of family housing, but can ensure the delivery of a more balanced housing stock in an efficient manner that responds well to locational considerations.	No changes proposed. RBC has commissioned evidence to ensure that the final proposed housing mix figures will not conflict with the feasibility or viability of a development, nor the overall housing targets. This policy also takes into account local needs in terms of tenure/mix. In terms of suitability of location, existing policy H2 addresses this matter.

		<p>It is understood that this section of the Partial Update is still based upon the Berkshire (with South Bucks) Strategic Market Housing Assessment 2016 and whilst para 8.21 of the Partial Update states that further updater work on housing need is not likely to show much difference in demand, this work needs to be carried out as the 2016 evidence is now quite old. Furthermore, the analysis does not take into consideration the need for housing size according to tenure. There can be significant differences here, with there often being greater demand for smaller affordable housing units in comparison to private units.</p> <p>The policy also needs to be prepared on a wider basis rather than just looking at Reading. Reading sits within a housing market that extends significantly beyond the borough boundaries with much of the built up area of outer Reading being within neighbouring local authorities. Densities are generally lower in these suburban areas and the provision of lower density housing in these areas, in particular through strategic land allocations, can provide an effective contribution to meeting family housing needs in Reading, whilst the higher density housing opportunities in Reading can similarly meet the demand for smaller housing within this wider housing market.</p>	Where family sized accommodation needs can be provided within the borough, there is no need for surrounding authorities to accommodate this.
Reading Friends of the Earth	No answer	Updated demographic models should be used – SHMA was 2016 – before Covid and Working From Home. Plans should be made for Greater Reading area – not just RBC area – to take account of existing schools, parks and other relevant features.	An updated HELAA has been produced in support of the Reg 19 consultation as well as a Housing Needs Assessment. The Housing Needs Assessment takes into account wider trends within the region. Cross boundary discussions of need have taken place with neighbouring authorities.
Stantec OBO St Edwards Homes	No answer	<p>It is important that Policy H2 recognises that the provision of a significant quantum of family homes may not be achievable on all sites. For example, on high-density flatted developments it may not always be feasible to provide 67% of homes as 3+ bed. In such circumstances, a greater number of smaller dwellings may be more appropriate and may in doing so allow for a greater contribution towards housing need,</p> <p>The SA notes that maintaining the existing rate for the delivery of 3+ bed dwellings (Option H2(iv)) would have a positive impact on undeveloped land (SA Objective 4) as well as on addressing, adapting and preparing for climate change (SA Objectives 1-3). It is noted within the SA that more positive impacts against these objectives would be achieved with the existing rate of 50% compared to the proposed increase to 67% as larger family homes require more land and can bring negative effects towards meeting climate change targets.</p> <p>Given the benefits resulting from the delivery of smaller dwellings, we recommend that a balanced approach to housing size is taken within Policy H2, with family housing encouraged and sought where possible but without going so far as to impose a requirement for 67% 3+bed homes regardless of how achievable this is. The imposition of a strict requirement risks developments not being feasible or viable and so should be avoided.</p>	No changes proposed. Commissioned evidence will be provided which assesses the viability or feasibility of an increase in family sized housing.
Savills OBO Viridis	No answer	See comments on CR6.	See officer response to respective comments
Opus Works (OBO AEW and McLaren (Broad Street Mall))	Other	<p>Whilst the proposed change requiring a greater delivery of more family homes on sites in suburban locations in the Borough is supported, any provisions requiring specific requirements for town centre and urban sites will result in the following:</p> <p>Urban-centre living is generally less attractive to families than suburban and rural locations which are, generally speaking, better placed to deliver both public and private amenity and play space, as well as open space. Noise, air pollution and perceived safety also often factors which deter families from being attracted to move to urban locations. It is therefore unlikely that building swathes of family homes in urban areas will generate enough demand to ensure the viability of urban sites.</p>	<p>No changes proposed. A Whole Plan Viability Assessment will accompany the Local Plan and initial findings suggest that the proposed mix figures will not affect viability.</p> <p>Other policies are in place to ensure that the quality and amenity standards of high-density living in urban areas are suitable for a range of residents and to help cultivate a healthy population mix.</p>

		<p>The Council should be prioritising the balance between providing developers with the flexibility to ensure that these sites are viable whilst ensuring that a considerable amount of affordable housing is delivered. Requiring the delivery of a significant proportion of family homes upon these sites will upset this balance that the Council have to find, reducing both overall yields and the quantum of affordable housing. It is noted that Paragraph 63 of the NPPF requires planning policies to facilitate the delivery of housing of all sizes, types and tenure needed for different groups, and there is a danger that the Council's proposed approach to prioritising family homes will result in a failure to address the housing needs of other groups.</p> <p>As such, it is important that the proposed amendments to Policy H2 regarding family homes, whilst addressing the shortfall in delivery of the last 10 years, do not hinder the viability of town centre and urban sites through adversely affecting yield and increasing cost. Flexibility is required for such sites and the focus for the delivery of family units should be directed to the larger regeneration schemes that can provide significant open and play spaces and contribute towards schools and healthcare provision. Policy H2 should therefore ensure a degree of flexibility which does not restrict would-be developers and facilitates the delivery of a wide product mix on town centre and urban sites, including affordable housing and larger units, to cater for a breadth of groups.</p> <p>The principle of updating Policy H2 to facilitate the delivery of more family homes is therefore supported, but in light of the above, it is instead recommended that only the following changes are made to Policy H2:</p> <p>That the minimum proportion of 3 - or more bed homes required on sites of ten or more dwellings outside centres be increased from 50% to 67% (one third) unless this is not achievable; That a minimum percentage of three-bed dwellings within district and local centres of 5% is retained.</p> <p>The other suggested changes to Policy H2 are not supported.</p>	
<p>Opus Works (OBO British Estates Services Ltd)</p>	<p>No answer</p>	<p>Whilst the proposed change requiring a greater delivery of more family homes on sites in suburban locations in the Borough is generally supported, it is noted that over-provision of larger units can result in lower yields which could impact upon viability and the delivery of affordable housing. Furthermore, such a strategy would undoubtedly not optimise finite land resource which once redeveloped has gone for generations.</p> <p>It is therefore considered that the Council should be prioritising the balance between providing developers with the flexibility to ensure that sites coming forward are viable whilst ensuring that a considerable amount of affordable housing is delivered. Requiring the delivery of a significant proportion of family homes upon these sites will upset this balance that the Council have to find, reducing both overall yields and the quantum of affordable housing. It is noted that Paragraph 63 of the NPPF requires planning policies to facilitate the delivery of housing of all sizes, types and tenure needed for different groups, and there is a danger that the Council's proposed approach to prioritising family homes will result in a failure to address the housing needs of other groups.</p> <p>As such, it is important that the proposed amendments to Policy H2 regarding family homes, whilst addressing the shortfall in delivery of the last 10 years, do not hinder the viability of sites on previously-developed land from coming forward; often these can require significant remediation and therefore flexibility is required within policy for such sites to clearly identify that delivery of higher family unit numbers, will be subject to viability.</p> <p>The principle of updating Policy H2 to facilitate the delivery of more family homes is therefore supported, but in light of the above, it is instead recommended that only the following changes are made to Policy H2: That the minimum proportion of 3 - or more bed homes required on sites of ten or more dwellings outside centres be increased from 50% to 67% (one third) unless this is not achievable as demonstrated by viability assessment;</p> <p>The other suggested changes to Policy H2 are not supported.</p>	<p>No changes proposed. A Whole Plan Viability Assessment will accompany the Local Plan and initial findings suggest that the proposed mix figures will not affect viability.</p>

Opus Works (OBO Moda Living)	No answer	<p>Moda supports the creation of highly managed, highly amenitised neighbourhoods, which include a mix of homes. Families play an important part in this process. In this context, it is important to recognise that some town centre locations are more attractive to family housing than others. Viability considerations given that the high proportion of housing in the town will be derived from previously developed land also needs to be factored in. Key to the delivery of a wider housing mix in Reading is to allow a flexible approach that supports a wider range of housing products, including BTR and Co-Living on larger sites to help better financially enable development proposals and underpin delivery of a greater quantum of larger units and affordable housing. The provision of social infrastructure (doctors, dentists etc) to support a focus on family housing should be a crucial part of the Council's strategy.</p>	<p>No changes proposed. A Whole Plan Viability Assessment will accompany the Local Plan and initial findings suggest that the proposed mix figures will not affect viability.</p> <p>Other policies are in place to ensure that the quality and amenity standards of high-density living in urban areas are suitable for a range of residents, which will be assessed on a case-by-case basis.</p> <p>Local Plan objectives include provision of social infrastructure within the borough.</p>
Opus Works (OBO AEW Core Plus Property Fund)	No answer	<p>Whilst the proposed change requiring a greater delivery of more family homes on sites in suburban locations in the Borough is supported, any provisions requiring specific requirements for town centre and urban sites will result in the following:</p> <p>Urban-centre living is generally less attractive to families than suburban and rural locations which are, generally speaking, better placed to deliver both public and private amenity and play space, as well as open space. Noise, air pollution and perceived safety also often factors which deter families from being attracted to move to urban locations. It is therefore unlikely that building swathes of family homes in urban areas will generate enough demand to ensure the viability of urban sites. The Council should be prioritising the balance between providing developers with the flexibility to ensure that these sites are viable whilst ensuring that a considerable amount of affordable housing is delivered. Requiring the delivery of a significant proportion of family homes upon these sites will upset this balance that the Council have to find, reducing both overall yields and the quantum of affordable housing. It is noted that Paragraph 63 of the NPPF requires planning policies to facilitate the delivery of housing of all sizes, types and tenure needed for different groups, and there is a danger that the Council's proposed approach to prioritising family homes will result in a failure to address the housing needs of other groups.</p> <p>As such, it is important that the proposed amendments to Policy H2 regarding family homes, whilst addressing the shortfall in delivery of the last 10 years, do not hinder the viability of town centre and urban sites through adversely affecting yield and increasing cost. Flexibility is required for such sites and the focus for the delivery of family units should be directed to the larger regeneration schemes that can provide significant open and play spaces and contribute towards schools and healthcare provision. Policy H2 should therefore ensure a degree of flexibility which does not restrict would-be developers and facilitates the delivery of a wide product mix on town centre and urban sites, including affordable housing and larger units, to cater for a breadth of groups.</p> <p>The principle of updating Policy H2 to facilitate the delivery of more family homes is therefore supported, but in light of the above, it is instead recommended that only the following changes are made to Policy H2:</p> <ul style="list-style-type: none"> - That the minimum proportion of 3 - or more bed homes required on sites of ten or more dwellings outside centres be increased from 50% to 67% (one third) unless this is not achievable; - That a minimum percentage of three-bed dwellings within district and local centres of 5% is retained. <p>The other suggested changes to Policy H2 are not supported.</p>	<p>No changes proposed. A Whole Plan Viability Assessment will accompany the Local Plan and initial findings suggest that the proposed mix figures will not affect viability.</p> <p>Other policies are in place to ensure that the quality and amenity standards of high-density living in urban areas are suitable for a range of residents, which will be assessed on a case-by-case basis.</p>
Opus Works (OBO)	No answer	<p>Whilst the proposed change requiring a greater delivery of more family homes on sites in suburban locations in the Borough is supported, any provisions requiring specific requirements for town centre and urban sites will result in the following:</p>	<p>No changes proposed. A Whole Plan Viability Assessment will accompany the Local Plan</p>

Mapledurham Properties Ltd)		<p>Urban-centre living is generally less attractive to families than suburban and rural locations which are, generally speaking, better placed to deliver both public and private amenity and play space, as well as open space. Noise, air pollution and perceived safety also often factors which deter families from being attracted to move to urban locations. It is therefore unlikely that building swathes of family homes in urban areas will generate enough demand to ensure the viability of urban sites. The Council should be prioritising the balance between providing developers with the flexibility to ensure that these sites are viable whilst ensuring that a considerable amount of affordable housing is delivered. Requiring the delivery of a significant proportion of family homes upon these sites will upset this balance that the Council have to find, reducing both overall yields and the quantum of affordable housing. It is noted that Paragraph 63 of the NPPF requires planning policies to facilitate the delivery of housing of all sizes, types and tenure needed for different groups, and there is a danger that the Council's proposed approach to prioritising family homes will result in a failure to address the housing needs of other groups.</p> <p>As such, it is important that the proposed amendments to Policy H2 regarding family homes, whilst addressing the shortfall in delivery of the last 10 years, do not hinder the viability of town centre and urban sites through adversely affecting yield and increasing cost. Flexibility is required for such sites and the focus for the delivery of family units should be directed to the larger regeneration schemes that can provide significant open and play spaces and contribute towards schools and healthcare provision. Policy H2 should therefore ensure a degree of flexibility which does not restrict would-be developers and facilitates the delivery of a wide product mix on town centre and urban sites, including affordable housing and larger units, to cater for a breadth of groups. The principle of updating Policy H2 to facilitate the delivery of more family homes is therefore supported, but in light of the above, it is instead recommended that only the following changes are made to Policy H2:</p> <ul style="list-style-type: none"> - That the minimum proportion of 3 - or more bed homes required on sites of ten or more dwellings outside centres be increased from 50% to 67% (one third) unless this is not achievable; - That a minimum percentage of three-bed dwellings within district and local centres of 7.5% (not 20%) be applied. The other suggested changes to Policy H2 are not supported. 	<p>and initial findings suggest that the proposed mix figures will not affect viability.</p> <p>Other policies are in place to ensure that the quality and amenity standards of high-density living in urban areas are suitable for a range of residents, which will be assessed on a case-by-case basis.</p>
Montagu Evans (OBO Abridn)	No answer	<p>Whilst we acknowledge the importance of delivering further family housing, the draft plan is proposing a policy where in the event of a conflict between minimum density and family housing, minimum density will take priority. This represents an overly prescriptive element of plan making, especially in the context of Town Centre and complex urban sites which are difficult to deliver even without the extra burden of a higher proportion of 3+ bed dwellings. This would likely further exacerbate Reading's forecasted shortfall in housing delivery. As such implementing this prescriptive policy approach would conflict with the Framework in these respects.</p>	<p>No changes proposed. A Whole Plan Viability Assessment will accompany the Local Plan and initial findings suggest that the proposed mix figures will not affect viability.</p>
Savills (OBO John Lewis Partnership)	No answer	<p>Whilst the need for 3-bed homes is acknowledged based on the SHMA (2016), it is notable that the SHMA was published 8 years ago. It is important therefore that an up-to-date assessment of local housing needs is undertaken in order to appropriately inform housing mix requirements sought during the LPPU plan period to 2041. It is also important that the LPPU does not prescriptively set out mix requirements for all sites, but is sufficiently flexible to take into account site-specific circumstances and viability considerations, particularly in light of the borough's overall increasing housing needs.</p> <p>The LPPU should also recognise all forms of housing provision which can contribute to family needs, including for instance the contribution of larger 2-bed units which can provide for families of up to 4 people.</p>	<p>No changes proposed. An updated HELAA and Housing Needs Assessment has been prepared to inform the revised required dwelling mix.</p> <p>A Whole Plan Viability Assessment will accompany the Local Plan and initial findings suggest that the proposed mix figures will not affect viability.</p>
Savills (OBO Sorbon Estates Ltd)	No answer	<p>Whilst the need for 3-bed homes is acknowledged based on the SHMA (2016), it is notable that the SHMA was published 8 years ago. It is important therefore that an up-to date assessment of local housing needs is undertaken to appropriately inform housing mix requirements sought during the LPPU plan period to 2041. Such a large uplift, particularly across such a large and broad area (i.e. all areas outside centres), could limit the potential for sites that could achieve a greater density to meet the Council's housing requirements. It is also not clear how the percentage uplifts have been determined. It is important to ensure that the type and mix of new housing sought across the</p>	<p>The Housing Needs Assessment considers the needs of different sizes of dwellings, and these needs are set out in the Pre-Submission version of the Local Plan. The very strong need for larger family homes means that an approach which seeks to</p>

		<p>Borough is based on an up-to-date assessment of local needs. This should also include consideration of whether larger two-bedroom homes (for 4 people) can accommodate family housing needs. Family homes do not necessarily need to comprise three or more bedrooms.</p> <p>In line with how the LPPU is now proposing to consider density, breaking it down into four spatial areas (Town Centre, Highly accessible urban sites, other urban sites and suburban sites) – the percentage of 3 or more bed homes in each area should also be broken down accordingly (as opposed to the blanket approach proposed for all sites outside the centres to achieve 67%). In particular, the mix percentage to be applied to district and local centres should also include 'highly accessible urban sites'. This would ensure there is consistency between the approach to density and mix.</p> <p>In the context of Site SOU1 – Reading Link Retail Park, it is a highly accessible urban site close to the town centre and should be considered more akin to a town centre site, where the site context and area indicate opportunities for family-sized housing are likely more limited. While it is envisaged it certainly can provide a quality mix of homes to form a balanced community, including 3 or more bedrooms; a proportion comprising 67% of three or more bed homes for an apartment-led scheme in a highly accessible urban location such as Reading Link, would not be appropriate. It is also important that the LPPU does not prescriptively set out mix requirements for all sites, but is sufficiently flexible to take into account site-specific circumstances and viability considerations, particularly in light of the borough's overall increasing housing needs and the optimisation of density to achieve this.</p>	distinguish significantly between urban and suburban sites will not be effective in delivering significant additional family homes, as there are simply not enough suburban sites to make much of a difference in this regard.
The Planning Bureau on behalf of McCarthy Stone	Other	As detailed in our response to question 37, as recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market. This is a key point for Reading who are seeking to increase the supply of family sized homes. The Partial update must not disregard the importance of also delivering specialist housing for older people given the positive knock-on effect in terms of releasing family housing that older person's housing bring.	Noted. Policy H6 in the Pre-Submission Partial Update identifies and plans for the level of need for specialist housing for older people.
M Langshaw	Y	More family housing is so obviously needed.	Answer is noted. No changes proposed.
Iceni (OBO TT Group)	No answer	Requiring 67% of homes to be three-bedroom or more on sites outside of town centres may result in developments being unviable and undeliverable. There should be flexibility built into this policy to allow sites to be assessed on a case-by-case basis, taking into account viability, as well as the provision of other types of housing (e.g. housing for older people) and other planning benefits of the scheme.	No changes proposed. The housing needs assessment considers latest needs for housing for older people and has been factored into the LPPU as necessary. A Whole Plan Viability Assessment will accompany the Local Plan and initial findings suggest that the proposed mix figures will not affect viability.

Additional representations submitted via email regarding increase in family housing

Respondent name	Comments	RBC Officer Response
Earley Town Council	ETC is in full agreement with the comments about housing types as discussed in section 8.20 onwards of the consultation document and would fully support a policy that places an emphasis on delivering family housing. Such housing must ideally be	No changes proposed. Any development must adhere to affordable housing requirements as well as minimum density standards.

	affordable and aimed at young families. Luxury developments of four bed plus detached houses should only be considered very carefully as part of a fully balanced mix of housing types.	
MRPP (OBO Samuel Smith Old Brewery)	<p>Whilst a need for family housing is not disputed, the Council need to be particularly mindful of the constraints that are often faced by town centre sites, in terms of heritage considerations and other design matters, with family units often unable to be achieved on smaller town centre sites in comparison to larger, undeveloped, out of town greenfield sites.</p> <p>The Council acknowledges at paragraph 12.12 that the majority of housing delivery over the plan period will take place within the town centre. As set out above it will however be necessary to carefully balance matters to ensure sites will be delivered and are not being stymied due to onerous requirements imposed. For instance, whilst a policy compliant scheme of 15% family homes may be granted, this may then subsequently be difficult to deliver due to viability or other considerations. Thus, the development will not come forward and the site will not be contributing to delivering much needed housing. As set out above, such sites generally face constraints which add additional costs to delivery over and above development of greenfield sites and this needs to be borne in mind with any change to Policy CR6.</p>	<p>No changes proposed. Existing policy H2 already sets out these considerations / constraints. It is unclear how increasing the need for family sized dwellings will fail to meet these requirements where design is carefully considered.</p> <p>A Whole Plan Viability Assessment will accompany the Local Plan and initial findings suggest that the proposed mix figures will not affect viability.</p>
Darcliffe Homes	We are potentially concerned by RBC intention to increase the amount of family housing within the town and local centres. We question whether this is wholly appropriate, whether the accompanying schools and infrastructure to support families is available. Will such a policy result in a contrived family environment which is later utilised by young professional or student renters and sub-lets. Thus whilst we are supportive of the principles, the practicalities of town centre living may not deliver the type of accommodation to support families.	<p>No changes proposed. The town centre is likely to make up the majority of housing delivery over the plan period and therefore a greater mix of housing is required here, including family dwellings.</p> <p>The Council is liaising with infrastructure providers to determine long term infrastructure needs that would result from the level of growth within the Borough, which includes education facilities and other provisions to support families e.g. open space.</p>
Lichfields (OBO Tilehurst People's Local Charity)	<p>See NPPF Para 60</p> <p>The Kentwood and Armour sites allocated under policies WR3t and WR3s in the adopted RBLP are outside of the town centre, and therefore have potential to meet RBC's increasing housing need, including the need for family housing. The LPPU recognises this. As discussed in section 8, the Local Plan is not in a position where it can generally afford to lose existing allocated housing sites, particularly in relation to the standard methodology" (LPPU para 12.66).</p> <p>Our client concurs that the sites would make an important contribution towards RBC's housing need (which is significantly increasing as outlined in section 2) including the requirement for family housing.</p> <p>Retaining the site allocations for residential development is consistent with, and necessary to meet the NPPF's approach to significantly boosting the supply of homes by ensuring a sufficient amount and variety of land can come forward where it is needed. Conversely our clients consider that removing (or altering) allocations WR3t and WR3s, or designating the site as LGS in full or in part through the LPPU would bring into question whether the LPPU was justified, positively prepared and containing a justified and effective approach to meet housing need, including that for family housing.</p>	<p>Noted. On the basis of the identified biodiversity value of part of the WR3s site, the site boundary is reduced and the development capacity also reduced. However, the remainder of the sites are retained and the contribution they could make to family housing provision is recognised.</p>

Q. 31 Do you agree with the proposed update to policy H2 to strengthen the wording on self-build?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
James Ford	Other	Self building is outside of conformity, standardisation & parity. I can't support it.	No changes proposed. Only a small portion of developments are to make provision for self-builds to avoid their competing with the overarching character of a scheme in terms of

			design and appearance. In addition, the appearance, design and relationship to the surrounding context will be assessed at the planning application stage to ensure the self build would be acceptable.
Henry Wright	N	Agree with justification to keep weaker wording on self build - it's the houses that matter not who builds them.	Answer is noted.
Reading Climate Action Network	Y	There is a great shortage of self-build opportunities in the area	Noted. No change needed.
Paul Oliver James Melville	Y	self build leads to better upkeep and pride in the property.	Noted. No change needed.
HBF	No answer	The HBF would question whether the evidence on the demand for self-build homes requires the proposed wording especially if it has not considered other options to support self-build delivery as outlined in paragraph 57-025 of Planning Practice Guidance. Before strengthening the wording relating to self-build the Council should proactively seek to identify sites, particularly on its own land, rather than require their provision as part of all major residential development.	No change proposed. The priority for the use of the Council's own land remains affordable housing, and there are unlikely to be significant opportunities for self-build from this source.
Stantec (OBO UoR)	Other	The University does not object to the proposed amendment to this policy, however, would emphasise that the 'wherever viable and achievable' wording is retained to ensure that this requirement is applied on a case-by-case basis.	Agreed. No change proposed.
Savills (OBO Sorbon Estates Ltd)	No answer	The Council's statutory duties in connection with the provision of Self-build houses are acknowledged and it is welcomed that the Council's Self-build register applies a local connection test. The proposed change to the policy wording needs to maintain flexibility, given the constraints of the Borough. The change in wording to 'should' appears to allow some flexibility. However, the policy also needs to go further and recognise that it cannot be determined whether entries onto the Self-build register are genuine interests or speculative, or whether they have signed up to multiple Local Authorities. The LPPU policy also needs to acknowledge that comprehensive apartment-led schemes by their very nature, would be unable to deliver any self-build opportunities and the policy make it clear that self-build is only necessary to be considered where houses are proposed to be delivered. This appears to be the intention of the policy but should be made clear in any supporting text. The policy text must also maintain flexibility where the viability and achievability of providing self-build can be considered on a case-by-case basis.	It is agreed that further clarification be added to ensure that only houses, not flats, are covered, but this is most appropriate in the supporting text. The supporting text also already makes clear that there may not always be a clear relationship between entries on the register and actual demand in practice, but the statutory duty is clear that the register is the main indicator of need.
M Langshaw	Y	Ideally there would be much more self-build, but this is probably the best Reading can easily do.	No changes proposed.

Additional representations submitted via email regarding self-build

Respondent name	Comments	RBC Officer Response
Darcliffe Homes	We fully support the Council intended rewording of the policy regarding self-build housing. A minimum proportion should not be imposed as this will not be viable or deliverable for many of the sites developed within the Borough, particularly flatted developments.	Answer is noted. No changes required.

Q. 32 Do you agree with the proposals for incorporating First Homes into policy H3 as described?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	First home, last home, what difference does it make? A home without being exposed to "free market forces" exploitation should be on the agenda.	No change needed. The difference would mean that, by incorporating a requirement for

			25% First Homes as a part of the affordable housing contribution, there would be a delivery of discounted homes for sale to first time buyers.
Henry Wright	Y	Strengthen provision for key workers and exclude from local connection test if possible - this means we can attract key workers from other locations.	The local connection test for key worker homes is not set down by planning policy and is not a matter for the plan.
Reading Climate Action Network	No answer	No opinion	Answer is noted.
CADRA	Not answered	CADRA supports the need for affordable housing but does not have the knowledge or expertise to comment on the detailed proposals.	Answer is noted.
Abri	Not answered	<p>We support the proposed inclusion of the tenure mix currently set out in the Affordable Housing SPD into this policy as this will assist in the early stages of development planning, providing a clear strategy for affordable housing. Abri does not deliver First Homes and in response to question 32 we ask whether the Council has undertaken any specific appraisal of the affordability and deliverability of this tenure within Reading? It is important to understand this as the inclusion of this tenure comes at the expense of shared ownership homes which make an important contribution to enabling access to more affordable home ownership at a time when affordability continues to exert pressure on household incomes.</p> <p>Other local planning authorities, in undertaking local plan reviews, new policy formulation and supporting guidance, have expressed the lack of affordability in their area and as a result have provided a policy preference for shared ownership. We encourage the Council to review whether First Homes will meet local housing needs without a substantial discount and on anything other than the smallest house sizes, and whether it should instead look to optimise affordable housing delivery through homes for rent and shared ownership, as with the current policy and guidance.</p>	Agreed. The draft policy allows for the 38% affordable ownership tenure to be either shared ownership or First Homes.
Damians Bramanis	N	No. It's very clear that home ownership is directly correlated with a greater sense of community and improved spaces. I strongly support an increased minimum number of first homes, to displace affordable (rented) housing. By encouraging people to own their own homes, rather than prioritising the needs of landlords, this will improve the community.	No change proposed. It is considered that requiring 38% of the affordable housing provided to be in the form of ownership products represents a high proportion. Based on evidence commissioned by the Council, homes offered at 'Reading affordable rent' levels most clearly addresses need within the Borough.
Stantec OBO St Edwards Homes	No Answer	<p>We recognise that to be consistent with national guidance Policy H2 should be updated to refer to First Homes and broadly support the proposed pragmatic approach to dealing with First Homes.</p> <p>We recommend that, to ensure pragmatism, the policy allows for circumstances in which 38% shared ownership may be deemed by the Council to be preferable to 25% First Homes and 13% shared ownership. Such an approach has been accepted in recent decisions, for example in Brentford, and the policy should not remove the potential for such an approach if it is agreed through Section 106 negotiations to be appropriate.</p>	Agreed. The draft policy allows for the 38% affordable ownership tenure to be either shared ownership or First Homes.
Savills OBO Viridis	No Answer	<p>This approach does not appear to align with national guidance that seeks to prioritise the 25% First Homes provision, then split the remaining tenure in accordance with the existing ratio (47% Reading Affordable Rent and 28% Shared Ownership respectively).</p> <p>We suggest that, to maintain flexibility, the policy should not contain explicit tenure mix percentages within the principal policy text. It should be worded in a way that allows for the tenure to be reviewed and negotiated on a site-</p>	No change proposed. The most significant need in Reading is for affordable housing for rent. The NPPF expects local authorities to identify housing needs and plan accordingly, and reducing the amount of rented accommodation sought in order to accommodate First Homes (particularly when

		by-site basis, to reflect the nature of the development and local needs. Specific guidance on tenure mixes sought should be retained in supplementary guidance.	<p>the direction of travel of national policy is to allow more flexibility for local authorities to identify needs) is not considered to address this.</p> <p>The reason that the existing Local Plan is silent on specific tenure is that the work had not been done to substantiate it. That work has now been done and, as the tenure sought is such a vital element of the affordable offer, it is considered appropriate for policy to specify the needs.</p>
Opus Works (OBO AEW and McLaren (Broad Street Mall))	No Answer	<p>Whilst the principle of updating Policy H3 to account for different affordable tenures is supported, First Homes is a flawed initiative which will only displace other affordable tenures. Other affordable tenures, particularly affordable rent homes, appeal to a wider range of potential occupants (not just those looking to buy) and are therefore in much higher demand. With 25% of all affordable homes provided through Section 106 having to be First Homes, there will clearly be an impact on the provision of other affordable, more in-demand, tenures since there will have to be an equivalent reduction in these tenures to accommodate this. The Council would also be tasked with the complex administrative burden of allocating First Homes, as well as monitoring the marketing of them, as if First Homes have been marketed for six months and there is no demand, they can be flipped back to full market cost.</p> <p>We therefore consider that the Council should be promoting other affordable products through Policy H3 such as Co-Living [which can offer] cheaper rents for residents. Many Co-living facilities allow residents to sign short-term leases, ranging from a few weeks to several months, offering an attractive option to young people in particular.</p> <p>Further to this, we propose that Policy H3 is updated to ensure that affordable housing is delivered through Build-to-Rent (BtR) schemes. BtR is a rapidly growing market and can offer high-quality affordable accommodation. As BtR buildings are purpose built, they are professionally-managed stock in single ownership and management control, generally providing a better living experience than other private rental tenures. Furthermore, the BtR model encourages operators to ensure high occupancy rates and limited periods of vacant homes. Thus, for those who wish to sign longer tenancies, the option is available. It is therefore an extremely flexible option that can cater to a diverse range of people.</p> <p>We therefore suggest that Policy H3 includes no reference to First Homes.</p>	<p>No change proposed.</p> <p>We agree that First Homes is complicated to deliver, appears to be of limited interest to the local market and does not meet our most pressing needs. Nevertheless, it is prioritised by the current version of the NPPF against which this plan is expected to be examined. It is appropriate to allow for the national policy to be achieved but the retain the flexibility to deliver shared ownership, which is a product which is known and commonly delivered locally.</p> <p>Policy H4 already allows for the provision of Affordable Private Rent in Built to Rent schemes.</p>
Opus Works (OBO British Estates Services Ltd)	Y	The proposed changes to Policy H3 are supported. Enabling first time buyers within the property market is a central tenet of current Government Policy and the provision of First Homes will therefore cater for this. Further advice is required on the mechanisms proposed within policy for the marketing and administration of this policy to ensure a consistent approach across developments.	Noted. No change required. More detail is now provided in the draft policy.
Opus Works (OBO Moda Living)	No answer	Moda is an inclusive rental product which incorporates the provision of affordable homes into its neighbourhoods wherever commercially possible. Within Policy H3 it is important that the policy wording reflects where First Homes can apply, for instance, in a standard housing model comprising Private for Sale and affordable housing, and where it would not, as in the case of BTR and Co-Living. Further guidance on affordable housing policy for Co-Living is welcomed.	Noted. No change needed. Policy H4 specifies the type of on-site affordable housing to be provided, whilst the policy on co-living does not support on-site provision.
Opus Works (OBO AEW Core Plus Property Fund)	No answer	Whilst the principle of updating Policy H3 to account for different affordable tenures is supported, First Homes is a flawed initiative which will only displace other affordable tenures. Other affordable tenures, particularly affordable rent homes, appeal to a wider range of potential occupants (not just those looking to buy) and are therefore in much higher demand. With 25% of all affordable homes provided through Section 106 having to be First Homes, there will clearly be an impact on the provision of other affordable, more in-demand, tenures since there will have to be an equivalent	<p>No change proposed.</p> <p>We agree that First Homes is complicated to deliver, appears to be of limited interest to the local market and does not meet our most</p>

		<p>reduction in these tenures to accommodate this. The Council would also be tasked with the complex administrative burden of allocating First Homes, as well as monitoring the marketing of them, as if First Homes have been marketed for six months and there is no demand, they can be flipped back to full market cost.</p> <p>We therefore consider that the Council should be promoting other affordable products through Policy H3 such as Co-Living [which can offer] cheaper rents for residents. Many Co-living facilities allow residents to sign short-term leases, ranging from a few weeks to several months, offering an attractive option to young people in particular.</p> <p>Further to this, we propose that Policy H3 is updated to ensure that affordable housing is delivered through Build-to-Rent (BtR) schemes. BtR is a rapidly growing market and can offer high-quality affordable accommodation. As BtR buildings are purpose built, they are professionally-managed stock in single ownership and management control, generally providing a better living experience than other private rental tenures. Furthermore, the BtR model encourages operators to ensure high occupancy rates and limited periods of vacant homes. Thus, for those who wish to sign longer tenancies, the option is available. It is therefore an extremely flexible option that can cater to a diverse range of people.</p> <p>We therefore suggest that Policy H3 includes no reference to First Homes.</p>	<p>pressing needs. Nevertheless, it is prioritised by the current version of the NPPF against which this plan is expected to be examined. It is appropriate to allow for the national policy to be achieved but the retain the flexibility to deliver shared ownership, which is a product which is known and commonly delivered locally.</p> <p>We do not consider that on-site affordable housing should be provided as part of co-living schemes, as this does not provide self-contained units with security of tenure that are needed. A financial contribution is more appropriate.</p> <p>Policy H4 already allows for the provision of Affordable Private Rent in Built to Rent schemes.</p>
<p>NHS Property Services</p>	<p>No answer</p>	<p>NHSPS supports the proposed changes to Policy H3 where it includes Key Workers to be eligible for First Homes but propose further changes to be made within the policy to widen the range of affordable homes made available to key workers, without limiting Key Workers' eligibility to First Homes schemes alone. This is recommended to also encourage the Council to consider how existing housing affordability issues for NHS staff as essential workers can be addressed through planning policy.</p> <p>A wider, and increasingly prominent area of focus for the NHS is to explore ways in which affordable homes for NHS staff can be planned and delivered. Independent research undertaken by Price Waterhouse Coopers (UK Economic Outlook, July 2019) identified a significant issue with housing affordability for NHS workers that is having a strong bearing on staff retention, commute times and morale.</p> <p>In undertaking further work to determine exactly what types of housing are needed and where, we suggest that the Council consider the need for types of affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.</p> <p>As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to a range of suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend the Council:</p> <ul style="list-style-type: none"> • Engage with local NHS partners such as the Buckinghamshire, Oxfordshire and Berkshire West ICB, NHS Trusts and other relevant Integrated Care System (ICS) partners • Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan • Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers. 	<p>The consultation did not mean to imply that only First Homes would be appropriate for key workers. Key workers may be eligible for a range of products. The approach in the Affordable Housing SPD is that, where a specific need is identified that will not be met elsewhere, on-site affordable can take the form of key worker accommodation rather than Reading Affordable Rent. This approach should be reflected in the updated policy.</p>

		The NHS advise that 'Homes for NHS Staff' should be a priority focus of the affordable housing provision where there is demand identified, such as in close proximity to key healthcare sites and for options aside from First Homes to be made available for these groups. Specifically, a portion of affordable housing could include a first right of refusal for NHS staff where there is a demonstrable need. We would welcome further discussion on this as a potential approach, along with other solutions to the issue of affordable homes for NHS staff as the Local Plan is developed further.	
Opus Works (OBO Mapledurham Properties Ltd)	No answer	<p>Whilst the principle of updating Policy H3 to account for different affordable tenures is supported, First Homes is a flawed initiative which will only displace other affordable tenures. Other affordable tenures, particularly affordable rent homes, appeal to a wider range of potential occupants (not just those looking to buy) and are therefore in much higher demand. With 25% of all affordable homes provided through Section 106 having to be First Homes, there will clearly be an impact on the provision of other affordable, more in-demand, tenures since there will have to be an equivalent reduction in these tenures to accommodate this. The Council would also be tasked with the complex administrative burden of allocating First Homes, as well as monitoring the marketing of them, as if First Homes have been marketed for six months and there is no demand, they can be flipped back to full market cost.</p> <p>We therefore consider that the Council should be promoting other affordable products through Policy H3 such as Co-Living [which can offer] cheaper rents for residents. Many Co-living facilities allow residents to sign short-term leases, ranging from a few weeks to several months, offering an attractive option to young people in particular. Further to this, we propose that Policy H3 is updated to ensure that affordable housing is delivered through Build-to-Rent (BtR) schemes. BtR is a rapidly growing market and can offer high-quality affordable accommodation. As BtR buildings are purpose built, they are professionally-managed stock in single ownership and management control, generally providing a better living experience than other private rental tenures.</p> <p>Furthermore, the BtR model encourages operators to ensure high occupancy rates and limited periods of vacant homes. Thus, for those who wish to sign longer tenancies, the option is available. It is therefore an extremely flexible option that can cater to a diverse range of people.</p> <p>We therefore suggest that Policy H3 includes no reference to First Homes.</p>	<p>No change proposed.</p> <p>We agree that First Homes is complicated to deliver, appears to be of limited interest to the local market and does not meet our most pressing needs. Nevertheless, it is prioritised by the current version of the NPPF against which this plan is expected to be examined. It is appropriate to allow for the national policy to be achieved but the retain the flexibility to deliver shared ownership, which is a product which is known and commonly delivered locally.</p> <p>We do not consider that on-site affordable housing should be provided as part of co-living schemes, as this does not provide self-contained units with security of tenure that are needed. A financial contribution is more appropriate.</p> <p>Policy H4 already allows for the provision of Affordable Private Rent in Built to Rent schemes.</p>
Savills (OBO Sorbon Estates Ltd)	No answer	<p>While it is acknowledged that it will be necessary to consider First Homes in line with national policy, as part of the overall affordable housing mix, the viability of the policy needs to be fully tested and Register Providers (RP's) need to be properly consulted, to assess the impacts on shared ownership and rental product provision. It is certainly considered that the First Homes discount should be no greater than 30% set out in the national policy.</p> <p>Experience from other sites in other Local Authorities indicates that the unintended consequence of the First Homes model is that it erodes the level of shared ownership that can be provided on-site to such a small percentage, it makes the overall affordable housing package for RP's to take over, very difficult to secure and in some cases, unviable.</p> <p>Therefore, to maintain flexibility, the policy should not contain explicit tenure mix percentages within the principal policy text. It should be worded in a way that allows for the tenure to be reviewed and negotiated on a site-by-site basis, to reflect the nature of the development and local needs. Specific guidance on tenure mixes sought should be retained in supplementary guidance.</p>	<p>Noted. The provisions of the policy are subject to the Whole Plan Viability Assessment.</p> <p>We agree that First Homes would potentially squeeze out shared ownership. Nevertheless, it is prioritised by the current version of the NPPF against which this plan is expected to be examined. It is appropriate to allow for the national policy to be achieved but the retain the flexibility to deliver shared ownership, which is a product which is known and commonly delivered locally.</p> <p>It is considered necessary for the policy to include provisions on tenure, as this is a key element of the affordable housing package to be secured, and certainty is required. A site</p>

			by site approach is unlikely to deliver against the most pressing affordable housing needs.
The Planning Bureau on behalf of McCarthy Stone	N	<p>We would remind the Council of the increased emphasis on Local Plan viability testing (See para 58 of NPPF and PPG Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the Council's planning obligations and building requirements should therefore be robust and as the current affordable housing target has not been tested under the current policy guidance the Council must also test the level of affordable housing to be sought given it is a key policy requirement. The level of affordable housing will also be influenced by the level of first homes.</p> <p>We would also like to remind the Council that the viability of specialist housing for older people is more finely balanced than 'general needs' housing and we are strongly of the view that these housing typologies should be robustly assessed in any forthcoming Local Plan Viability Assessment. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need.</p> <p>We would direct the Council towards the Retirement Housing Consortium paper entitled 'A briefing note on viability prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2013).</p>	A Whole Plan Viability Assessment supports the Local Plan policy.

Q. 33 Do you agree with the inclusion of a requirement for a deferred contribution in policy H3?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Christian Harris	N	Should not be deferred	No change proposed. Deferred contributions will only be permitted where viability evidence demonstrates that contributions would render development unviable. A deferred contribution clause would allow the Council to seek contributions at a later date should market conditions change. Without this clause, development would still go forward without the contribution and the Council would have no mechanism through which to seek monies at a later date.
Paul Oliver James Melville	Y	money into the local purse!	No changes proposed. Matter is beyond planning policy.
Opus Works (OBO AEW and McLaren (Broad Street Mall)	N	The inclusion of such a requirement cannot be supported. Most developers make decisions to progress development on the prevailing economic conditions at the time. Such a policy may resultantly deter many would-be developers from bringing forward opportunities in Reading and would turn their attention to other authorities where such requirements do not exist. As such, many sites, including those allocated, would simply not come forward, both reducing and stalling the delivery of much-needed housing. It is considered that use of CIL, S106 and open-book viability is appropriate and there is therefore no need to update Policy H3.	No change proposed. It is appropriate for the Council to seek to ensure that a policy-compliant contribution towards much needed affordable housing is made if economic conditions improve to the extent that this is viable. The evidence on the need for affordable housing is clear, and justifies this stance. It also reflects current practice.

Opus Works (OBO British Estates Services Ltd)	N	The inclusion of such a requirement cannot be supported. Most developers make decisions to progress development on the prevailing economic conditions at the time. Such a policy may resultantly deter many would-be developers, particularly small and medium sized housebuilders and promoters, which heavily rely on certainty when seeking finance and also speed of sale or development to ensure that interest costs do not become punitive. It is considered that the proposed inclusion of a deferred contribution in Policy H3 would stall the delivery of much-needed housing. It is considered that use of CIL, S106 and open-book viability is appropriate and there is therefore no need to update Policy H3.	No change proposed. It is appropriate for the Council to seek to ensure that a policy-compliant contribution towards much needed affordable housing is made if economic conditions improve to the extent that this is viable. The evidence on the need for affordable housing is clear, and justifies this stance. It also reflects current practice.
Opus Works (OBO Moda Living)	No answer	Developers typically make decisions to progress development on prevailing economic conditions, this including an element of forward forecasting. The decision made assumes a level of risk on this basis and so a policy that creates additional risk and uncertainty will reduce development interest. In particular, the proposed approach does not consider BTR or Co-Living products and circumstances sufficiently; the investment funds that typically seek to own such properties will make decisions on set criteria at project outset and generally have low appetite for risk. Reduction in investment fund interest will reduce overall demand for development in Reading, which in turn will reduce/stall delivery of much-needed housing. It is considered that open-book viability is appropriate. The Council could seek a 'fast-track' approach similar to that set out in the London Plan, Policy H5 should it wish to provide more certainty to the market and increase delivery of affordable housing.	No change proposed. It is appropriate for the Council to seek to ensure that a policy-compliant contribution towards much needed affordable housing is made if economic conditions improve to the extent that this is viable. The evidence on the need for affordable housing is clear, and justifies this stance. It also reflects current practice.
Opus Works (OBO AEW Core Plus Property Fund)	N	The inclusion of such a requirement cannot be supported. Most developers make decisions to progress development on the prevailing economic conditions at the time. Such a policy may resultantly deter many would-be developers from bringing forward opportunities in Reading and would turn their attention to other authorities where such requirements do not exist. As such, many sites, including those allocated, would simply not come forward, both reducing and stalling the delivery of much-needed housing. It is considered that use of CIL, S106 and open-book viability is appropriate and there is therefore no need to update Policy H3.	No change proposed. It is appropriate for the Council to seek to ensure that a policy-compliant contribution towards much needed affordable housing is made if economic conditions improve to the extent that this is viable. The evidence on the need for affordable housing is clear, and justifies this stance. It also reflects current practice.
Stantec (OBO Aviva Life & Pensions Ltd))	No answer	With regard to the proposed amendments to Policy H3 our Client also supports the addition of a S106 agreement deferred contributions mechanism, to be applied as appropriate.	Noted.
Opus Works (OBO Mapledurham Properties Ltd)	N	The inclusion of such a requirement cannot be supported. Most developers make decisions to progress development on the prevailing economic conditions at the time. Such a policy may resultantly deter many would-be developers from bringing forward opportunities in Reading and would turn their attention to other authorities where such requirements do not exist. As such, many sites, including those allocated, would simply not come forward, both reducing and stalling the delivery of much-needed housing. It is considered that use of CIL, S106 and open-book viability is appropriate and there is therefore no need to update Policy H3.	No change proposed. It is appropriate for the Council to seek to ensure that a policy-compliant contribution towards much needed affordable housing is made if economic conditions improve to the extent that this is viable. The evidence on the need for affordable housing is clear, and justifies this stance. It also reflects current practice.
Turley (OBO Oracle Limited Partnership)	No answer	See Planning Practice Guidance acknowledges on Build to Rent Development (Paragraph: 002 Reference ID: 60-002-20180913). National practice guidance suggests a minimum 20% deduction, while the Reading affordable rent is set at 70% of market levels, representing a 50% increase in the rental deduction. Whilst it is recognised that the national guidance is a minimum amount of rent discount, there is concern that requiring a 50% greater discount to be applied to properties in Reading will in fact result in substantially lower quantum of affordable housing delivery or make it so any build to rent scheme is no longer commercially viable, hence not deliverable. As being demonstrated across residential schemes in	No change proposed. Providing affordable housing is of limited benefit if it is not genuinely affordable to the people who need it. Evidence in Reading is that the Reading Affordable Rent level is what is needed to provide genuine affordable housing. Securing larger numbers of units at

		<p>Central Reading, viability is challenging with limited development surplus to deliver affordable housing. If a greater discount is applied to market rents, then each affordable unit will be worth less in the development appraisal and will result in a lower quantum of affordable houses being provided within a scheme, compared to a 20% deduction against market rates.</p> <p>The Council in Policy H3 is also proposing a deferred contribution mechanism in circumstances where a reduced affordable provision has been accepted. It is recognised that RBC have been actively adopting this approach already, however, incorporating the mechanism into policy will give it greater weight. Our client does have concerns about the incorporation of a deferred mechanism as it adds uncertainty into future costs of development, which can make investment decisions challenging.</p> <p>Should it be determined to incorporate this deferred contribution mechanism into policy, then it is applied consistently across all development proposals with clear guidance and a transparent process adopted so that it can be appropriately factored into development appraisals. This guidance should be published for consultation prior to adoption, with views sought from stakeholders and viability consultants. In addition to the mechanism allowing for RBC to seek a greater level of contribution should market conditions allow, it is essential the mechanism also enables applicants to seek a reduced level of contribution should a change in market conditions dictate that the previously agreed contribution is no longer viable.</p>	<p>80% of market rents will do little to address the most pressing needs.</p> <p>No change proposed. It is appropriate for the Council to seek to ensure that a policy-compliant contribution towards much needed affordable housing is made if economic conditions improve to the extent that this is viable. The evidence on the need for affordable housing is clear, and justifies this stance. It also reflects current practice.</p> <p>The Affordable Housing SPD already includes guidance on how this is to be applied, and this will continue.</p>
<p>The Planning Bureau on behalf of McCarthy Stone</p>	<p>N</p>	<p>The Council should note that in order to introduce such a deferred contribution or review mechanism, there must be a clear and specific policy basis for any review mechanism being imposed in line with PPG Viability para 009 Reference ID: 10-009-20190509.</p> <p>A significant number of recent Planning Appeals and case law have reinforced this point. A review mechanism that sits within a planning obligation also needs to be considered and assessed fully through the Local Plan process not via a SPD or a Practice Note. See para 004 Reference ID: 23b-004-20190901 of the PPG on Planning Obligations.</p> <p>There must therefore be a reasonable justification for imposing such a review mechanism. The requirement for a review mechanism is not supported by any justification, evidence, or process where specific inputs to be included within any review mechanism, could be considered in public examination. For example, certain exemptions should be introduced such as to smaller sites, that are built in one phase. The Planning Inspectorate have repeatedly noted that review mechanism for smaller sites, and single-phase developments are unnecessary so this must also be a consideration. Such a review mechanism will severely impact housing delivery.</p> <p>Therefore, to introduce a review mechanism, there must be a clear and specific policy basis and justification for any such mechanism to be brought in. A significant number of recent Planning Appeals and case law have reinforced this point. A review mechanism and any detail that will form part of it needs to be considered fully and assessed through the Local Plan process. This should include the consideration of variables such as trigger points, costs, land values, how surplus is split and other definitions. The plan should also include an exemption from the review mechanism for smaller single phased developments. The Council should also consider how such a review mechanism will impact housing delivery.</p>	<p>No change proposed. It is appropriate for the Council to seek to ensure that a policy-compliant contribution towards much needed affordable housing is made if economic conditions improve to the extent that this is viable. The evidence on the need for affordable housing is clear, and justifies this stance. It also reflects current practice, and it is recognised that its incorporation within policy rather than solely a SPD is required.</p>

Q.34 Do you agree with the inclusion of the proposed approach to instances where a Registered Provider cannot be found to take on affordable housing units? (This question relates to policy H3)

Respondent name	Y/N/ Other	Comments	RBC Officer Response
-----------------	------------	----------	----------------------

Paul Oliver James Melville	Y	why not, but keep a close eye on them!	No change needed.
-------------------------------	---	--	-------------------

Additional representations submitted via email regarding affordable housing

Respondent name	Comments	RBC Officer Response
HBF	<p>The cost of meeting higher energy efficiency standards and BNG will need to be considered and if necessary, reflected in the requirements set out in policy H3.</p> <p>The Council are proposing to amend H3 to reflect Government's policy of delivering 25% of affordable homes as First Homes. The HBF would agree with the Council's decision not to apply a greater discount than 30% minimum due to the impact of viability. However, it will be important that the viability evidence assesses the impact of First Homes. These homes are built and sold by the developer and must be treated as market homes in the viability assessment with the appropriate profit margin and costs relating to marketing and sales included.</p>	Noted. The costs of higher energy efficiency standards, BNG and First Homes has been assessed within the Whole Plan Viability Assessment.
Darcliffe Homes	We note that there is no intention to change the overall level at which affordable housing is sought, instead clarity will be provided regarding tenure, deferred contributions and cascades/mechanisms should a registered provider be unwilling to take a site. As such, at this time, we do not have any comments on these aspects.	Noted.

Q. 35 Do you agree with the proposed update to policy H4 around rolling tenancies forward?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	I think once you've paid your rent for 40yrs into the system you should live there the rest of your life rent free.	No changes proposed. Comments as suggested are beyond the scope of planning.
Christian Harris	Other	Tenants should be able to negotiate but housing is unaffordable because wages have not kept up with house inflation. Flats and rental are not the answer	No change proposed. Existing policy H4 states that for Build to Rent schemes, 30% on-site affordable housing must be provided. Due to the largely urban nature of the borough, high-density development (such as flats) is often required to suit the needs of the residents, as well as to meet housing targets.
Reading Climate Action Network	Y	Excellent suggestion	Noted. No change needed.
Watkin Jones Group	N	<p>While we acknowledge the need to adapt policies to the Build to Rent (BTR) sector's changing dynamics, we are not supportive of the proposed rent controls, which restricts the ability to adjust rents beyond the initial three-year tenancy period, due to the following reasons:</p> <p>Disincentivizing Investment: The suggested limitations on in-tenancy rental increases may unintentionally discourage property owners from investing in the maintenance and improvement of BTR properties. The flexibility to adjust rents based on market conditions is crucial for ensuring a fair return on investment and maintaining housing quality viably.</p> <p>Hindering Development: Restrictions on rental increases could dissuade property developers from undertaking new BTR projects. Concerns about covering costs and generating profits may lead to a decline in community infrastructure levy (CIL) revenues and other income streams essential for sustainable development.</p>	<p>No change proposed.</p> <p>The policy already allows for "structured and limited in-tenancy rent increases agreed in advance" and this will apply to the additional three year period in the same way as it would to the initial three years.</p>

		<p>Unofficial Rental Market: Historically, rent controls have given rise to a unofficial 'black market' where tenants and subtenants engage in off-the-books agreements to circumvent restrictions. This not only undermines the intended effectiveness of rent control policies but also raises legal concerns.</p> <p>National Planning Practice Guidance See PPG: 002 Reference ID: 60-002-20180913, Revision Date: 13 09 2018). This guidance underscores the notion that rents may be adjusted "in perpetuity," emphasizing the need for flexibility over time.</p> <p>We question the soundness of the proposed policy change, particularly in light of the Plan's desire for BTR homes to be delivered over the plan period. Rent restrictions, where rents are capped over a significant period (in this case, beyond three years), may deter investment and hinder the ability to address housing needs effectively throughout the planned period as set out above.</p> <p>"</p> <p>Considering the aforementioned concerns, we conducted an assessment of the available evidence supporting the "LPPU." There is a lack of clear evidence supporting the necessity for rent control beyond three years, and national policy does not explicitly encourage such measures.</p> <p>Leveraging our market expertise, we propose a refined approach to strengthen the policy's effectiveness. We recommend retaining the current policy, maintaining the provision of tenancies for private renters lasting a minimum of three years, with a six-month break clause in the tenant's favour and structured, limited in-tenancy rent increases agreed upon in advance. This ensures alignment with the National Planning Practice Guidance.</p> <p>This approach aims to secure tenant stability throughout the deemed sound and reasonable three-year tenancy length, aligning with National planning documents. Simultaneously, it safeguards the viability of BTR schemes, encouraging developers to persist in BTR projects, thereby addressing housing needs over the plan period.</p>	
Damians Bramanis	Other	I am strongly against build-to-let schemes in Reading, as they destroy the sense of community and ownership, and replace it with sterile soul-less housing.	No changes proposed. BTR is an important source of housing for those who cannot/do not want to buy or who cannot get access to social housing. Tenancies are provided to renters for a minimum of three years to avoid transience which can lead to problems in a sense of community.
RBC Private Sector Housing	Y	We agree that longer tenancies should be offered. Would welcome clarification on enforcement of this and who looks at this for compliance. Should there be reference to the Renters Reform Bill?	The Infrastructure Monitoring function of the Council monitors the implementation of S.106 agreements and would liaise with relevant RBC housing officers to ensure this is complied with. The Renters Rights Bill is still in the early draft stages and encompasses matters largely beyond the remit of planning. As such, its inclusion is not deemed necessary.
Opus Works (OBO Moda Living)	No answer	Current policy allows for a three year tenancy period, which is considered appropriate in terms of security of tenure. In order to create meaningful, successful, long-term communities it is imperative that management of those communities rests with the operator, who can make individual decisions in respect of tenants as part of sound, on-the-ground management. In most cases, it will make commercial sense to retain tenants rather than to risk vacancy and so further policy restriction is not considered necessary.	No changes proposed. Although comments are noted, it is important to make sure that the security of tenure is maximised insofar as possible, in particular given the growing importance of BTR as a source of housing,

		Whilst not explicitly open to consultation as part of the LPU, attention is drawn to the PPG (PPG) in respect of eligibility (Paragraph: 009 Reference ID: 60-009- 20180913). Accordingly, it is considered that the LPU provides opportunity to redress this element of policy to ensure consistency with that applied nationally.	with buying a home being out of reach for so many.
Turley (OBO Oracle Limited Partnership)	No answer	OLP do not have an in principle concern with this addition to the policy, highlighting that generally, BtR buildings are owned as a long term investment with a commercial investment on maintaining high levels of occupancy and limited vacancies. It has become industry standard, to offer a mix of three-year and five-year leases but it does need to ensure that any policy requirement for roll-over tenancies does not seek to influence or control rental levels during any tenancy roll extension. This is a matter which falls out with the planning policy remit and should be governed by the market.	Answer is noted. No changes needed. RBC is in agreement that controlling rental levels falls outside of planning policy and there is no reference to this in the update.
Savills (OBO John Lewis Partnership)	Y	JLP proposes to offer long tenancies for tenants [at Mill Lane] of up to 3 years. On this basis the proposed updates to Policy H4 are supported.	Answer is noted. No changes needed.

Q. 36 Do you agree that we should update policy H5 as described? Are there other changes that are required?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	Services & infrastructure in grids & "rings" to protect provision from single event isolations to large areas.	Answer is noted, but it is not within the scope of the Local Plan. Although the Local Plan is concerned with ensuring the proper infrastructure is in place to enable development, individual infrastructure providers such as Thames Water or SSE are responsible for planning and maintaining networks.
Reading Climate Action Network	Y	Yes I think this updated policy is very well considered, with one exception. The requirement to provide a contribution to the Local Authority as a last resort in the event that local on-site energy generation, or the other alternatives listed, "is not considered viable" by the developer, is one that is very likely to be used by developers as it does not require them to do any of the actual work in providing alternative energy provision. This could potentially give developers a way out of meeting the high standards that are rightly being proposed – by simply providing a cash contribution and adding this to the price of the new homes. I think this option should only be available in exceptional circumstances, as there is no inherent reason why the standards you propose could not be met by a developer. The size of the contribution should not be limited in the Policy (eg to £15,000 as proposed) because doing so would not future-proof the policy in terms of inflation or the actual costs of delivering alternatives. Perhaps the developer should be required to meet costs of a specific scheme designed to fill the "energy gap" of their development, plus the costs of estimating how much this would be. Thus providing cash would not be either an easy way out, or unnecessarily punitive. Additionally, should there be a presumption towards the provision of heat pumps rather than gas boilers? This would include an obligation on the developer to work with SSEN to ensure sufficient grid capacity is available – bearing in mind the recent experience at the golf course development in Emmer Green where insufficient capacity was available – but only because of inadequate planning.	Answer is noted. Policies in the local plan cannot render development unviable according to the NPPF. A cash contribution will only be sought in exceptional circumstances according to the "exceptional basis clause" outlined in the proposed policy. A presumption in favour of heat pumps is presumed, as installation of gas boilers would make the requirements of H5 very difficult to achieve. The Council is well aware of insufficient grid capacity and is working closely with SSE to ensure a smooth transition to net zero locally.
Paul Oliver James Melville	Other	not sure on this.	No change needed.
Abri	No answer	Since the publication of this consultation version draft local plan the NPPF has been formally updated and a ministerial statement concerning energy efficiency standards has been released. For plan-makers, the ministerial statement continues, the Government does not expect local energy standards that go beyond current or planned building regulations.	No change proposed. It is considered that the WMS does not preclude Local Authorities from setting their own energy efficiency standards and states that they may do so if they are "well-reasoned and robustly costed

	<p>This is an important point for Abri to raise in relation to the intended policy changes as the delivery of affordable housing is often hampered by the <i>“proliferation of multiple, local standards”</i> which raise the costs of development, <i>“adding complexity and undermining economies of scale”</i>. Abri wholly supports the delivery of higher building standards and sets out to achieve Future Homes Standards in our developments to ensure our customers have access to safe, warm, affordable homes that will remain so into the future. The insertion of the specific standards in the second part of this policy would create additional complexity into scheme design and potentially add significant additional costs that will undermine the ability to deliver, and maximise, affordable housing across the city. We ask that this policy is reconsidered in light of the Minister’s statement.</p>	<p>to ensure that development remains viable and that the impact of housing supply and affordability is considered in accordance with the NPPF.” It goes on to specify that any additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version on SAP.</p> <p>Reading’s proposed approach is well-reasoned and fully assessed through the Whole Plan Viability Study. Evidence suggests that these standards do not hamper development or present unreasonable costs for developers. In cases in which viability is affected, the proposed exceptional basis clause will apply.</p> <p>This policy approach reflects an approach carried forward by many other Local Authorities. It does not express a percentage uplift of TER using SAP, as this is metric that is increasingly no longer supported by industry and results in significant as-built performance gaps.</p> <p>Furthermore, national guidance is contradictory. For example, in 2021, the Future Homes Standard consultation response confirmed that there is no intention to amend the Planning and Energy Act 2008, which means that LAs will retain these powers. Finally, the WMS cannot undermine the primary powers and duties of LAs granted under legislation to combat and mitigate climate change (such as Section 29(1A) of the Planning and Compulsory Purchase Act 2004, the Climate Change Act 2008 and the Planning and Energy Act. RBC cannot adequately fulfil its duties under legislation with policies that result in significant as-built performance gaps or which defer to the energy efficiency standards set in the Building Regulations at this time.</p> <p>RBC would like to emphasise the urgency and importance of addressing the Climate Emergency. If the Council does not pursue</p>
--	--	---

			ambitious energy efficiency requirements, a net zero Reading will not be achieved by 2030.
RBC Private Sector Housing	Y	<p>Should look to support quieter technologies</p> <p>Need to refer to affordability of new technologies. Issues arise when people can't afford to run heating systems/mechanical ventilation for example. Excess heating/air con /rapid cooling. These factors can impact damp and mould.</p> <p>Developments should design to manage high temperature for instance chevron shade/shutters outside glazing thicker walls instead of costly cooling systems.</p>	<p>Noted. Policies CC2: Sustainable Design and Construction and CC3: Adaptation to Climate Change seek to address these concerns. Affordability of operation costs of new technologies is not within the scope of the Local Plan.</p>
CAAC	Other	<p>Agree in part</p> <p>We agree that the updated policy should take into account embodied carbon and the environmental impact of demolition but it is not as strong as the presumption against demolition in the proposed update to CC2. This may lead to a conflict between the two policies.</p> <p>This policy could be the one that sets out a preference for adaptation and re-use of existing buildings whether residential or otherwise within a development of new housing rather than wholesale demolition.</p>	<p>Noted. The requirements of CC2 apply to all development, whereas H5 seeks to list additional requirements for housing. Therefore, the presumption against demolition will apply.</p>
Reading Friends of the Earth	Y	<p>Yes.</p> <p>Does this also apply to extensions, renovations and retro-fits?</p> <p>No mention of boiler ban for new builds.</p> <p>Should new-builds be all-electric or have gas supply – and what capacity and what sort of gas (methane, H2, Biogas?)</p> <p>Should address embodied carbon.</p> <p>Should emphasise 'fabric first' approach to energy/climate issue – ideally to PassivHaus or similar standard.</p> <p>Developments should put limit on peak electricity demand anticipated and to be catered for to allow for ASHP and EV charging. Air-source Heat Pumps can be relatively inefficient in cold snaps when demand is highest. Promote GSHP and on-site energy storage.</p> <p>Concern that on-site generation will be solar and so – whilst useful:</p> <ul style="list-style-type: none"> • Inadequate because of limited roof-space on tall buildings • Seasonal so inadequate to address winter lighting and heating demand. <p>Water: Rainwater harvesting and grey water use.</p> <p>Should address implementation of and readiness for:</p> <ul style="list-style-type: none"> • Heat networks • Battery storage. • Heat storage. • Mechanical ventilation with heat recovery • Automatically limiting peak electricity demand to prevent overloads and shut-down, and perhaps designing in spare network capacity. <p>'exceptional basis clause'</p> <p>– question how to calculate energy requirements – is this to include times of year and times of day (so to raise issues of adequate year-round supply) or just a number of kWh per year? Actual aim should be to reach net zero emissions.</p>	<p>The requirements of CC2 apply to all development, whereas H5 seeks to list additional requirements for housing. Therefore, the principles of CC2 with regard to extensions, renovations and retrofits apply. It is considered unnecessary to refer to specific technologies or fuels (such as boilers, air source heat pumps, GSHP or "electric only") as the requirements of CC2 and H5 will not be able to be met with gas boilers.</p> <p>Embodied carbon is addressed in Policy CC2.</p> <p>The proposed language in CC2 and H5 does emphasise a fabric first approach.</p> <p>It is considered to prescriptive to specify technologies and or/storage solutions needed to achieve the requirements of the policy.</p> <p>Energy requirements should be expressed in kWh/m2/yr as stated in the policy with an aim to reach net zero emissions. This approach is considered best practice in the industry by LETI and has been carried forward by many other LAs.</p>
Stantec OBO St Edwards Homes	No answer	<p>St Edward welcome and support the Council's efforts to promote high levels of sustainability. (See Ministerial Statement given on 13/12/2023). This recent statement should be taken into account in the drafting of updated Local Plan policies.</p>	<p>No change proposed. It is considered that the WMS does not preclude Local Authorities from setting their own energy efficiency standards and states that they may do so if they are "well-reasoned and robustly costed</p>

			to ensure that development remains viable and that the impact of housing supply and affordability is considered in accordance with the NPPF.”
Historic England	Y	We welcome acknowledgement of heritage as a consideration within the proposed “exceptional basis clause” and addition of a paragraph requiring an embodied carbon assessment. No doubt the Council will carefully consider how this policy interplays with policy CC2.	Noted. No change required.
Savills OBO Viridis	No answer	(See Ministerial Statement given on 13/12/2023). Therefore, it is clear that building regulations should be statutory mechanism to meet building sustainability standards, and not planning policies. At the very least, any uplift beyond existing and future standards set by building regulations needs to be very carefully considered and the viability of such changes properly evidenced and understood.	<p>No change proposed. It is considered that the WMS does not preclude Local Authorities from setting their own energy efficiency standards and states that they may do so if they are “well-reasoned and robustly costed to ensure that development remains viable and that the impact of housing supply and affordability is considered in accordance with the NPPF.” It goes on to specify that any additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version on SAP.</p> <p>Reading’s proposed approach is well-reasoned and fully assessed through the Whole Plan Viability Study. Evidence suggests that these standards do not hamper development or present unreasonable costs for developers. In cases in which viability is affected, the proposed exceptional basis clause will apply.</p> <p>This policy approach reflects an approach carried forward by many other Local Authorities. It does not express a percentage uplift of TER using SAP, as this is metric that is increasingly no longer supported by industry and results in significant as-built performance gaps.</p> <p>Furthermore, national guidance is contradictory. For example, in 2021, the Future Homes Standard consultation response confirmed that there is no intention to amend the Planning and Energy Act 2008, which means that LAs will retain these powers. Finally, the WMS cannot undermine the primary powers and duties of LAs granted under legislation to combat and mitigate climate change (such as Section 29(1A) of</p>

			<p>the Planning and Compulsory Purchase Act 2004, the Climate Change Act 2008 and the Planning and Energy Act. RBC cannot adequately fulfil its duties under legislation with policies that result in significant as-built performance gaps or which defer to the energy efficiency standards set in the Building Regulations at this time.</p> <p>RBC would like to emphasise the urgency and importance of addressing the Climate Emergency. If the Council does not pursue ambitious energy efficiency requirements, a net zero Reading will not be achieved by 2030.</p>
Opus Works (OBO Moda Living)	No answer	<p>Moda is targeting operational net zero by 2030. Changes to Policy H5 are therefore welcomed, but it is considered that certain flexibility is provided to recognise the competing aspirations within the local plan and the additional viability constraints and potential impact on housing delivery and need that will be raised through the changes proposed.</p>	<p>Noted. This is the intention of the exceptional basis clause.</p>
Stantec (OBO UoR)	No answer	<p>Whilst clarification is required over the scope and definition of water consumption neutrality in order to support this proposed policy, the alternative approach to achieve the Building Regulations Part G optional target is with the specification of low flow fittings is supported.</p> <p>Operational Energy For operational energy, the targets expressed as energy-based metrics are in line with best practice per LETI. However, the targets are more stringent than those adopted by both Bath and North East Somerset Council¹³ and Cornwall County Council¹⁴, where the following targets are adopted:</p> <ul style="list-style-type: none"> • Space heating demand less than 30kWh/m²/yr • Total energy demand less than 40kWh/m²/yr <p>The balancing of total energy demand through provision of on-site renewable energy production may not be feasible or viable in all cases and therefore flexibility should be maintained with use of the “exceptional basis clause”. Examples may be where space, location or orientation of a building limit the efficiency or generation capacity of Solar PV installations.</p> <p>In line with comments on non-residential targets, further information should be provided on the exceptional basis mechanisms. Minimum and Maximum financial contributions per plot are indicated (minimum of £5k and maximum of £15k) however justification for the identification of the sums is not provided. In addition, the policy is proposing energy-based metrics however there are no established precedents for performance offsetting based on energy-based metrics. Therefore, clarification is required to understand if the offsetting is to be assessed against energy-based performance or another aspect of performance (carbon, for example) and if so what the related targets are. Any mechanism for offsetting should provide additional detail on the legal arrangement, the pricing mechanism, assessment methodologies and offsetting periods.</p> <p>The target is in line with recent similar Local Plan updates including Bath and North East Somerset who have specified a target of <900kg CO₂e/m² and Bristol City Council (draft Plan15) who have a target of between 400kg CO₂e/m² (for residential, 4 storeys or fewer) to <600kg CO₂e/m² (for major non-residential). These Local Plan specify the scope of embodied carbon by lifecycle phase (i.e. upfront versus whole lifecycle). As highlighted under policy CC2 for non-</p>	<p>Noted. No change required.</p> <p>Noted. This is the intention of the exceptional basis clause.</p> <p>The minimum and maximum financial contributions reflect best practice among other Local Authorities and provide a cost that is able to be included in the Whole Plan Viability Study.</p> <p>Offsetting is to be based against energy performance as stated in the policy, not emissions. Each proposal will be assessed on a case-by-case basis as the policy seeks to give developers the needed flexibility to be achieved and demonstrate how policy requirements have been met through a detailed Energy Statement or recognised certification method.</p> <p>The embodied carbon assessment specifies consideration of the substructure, superstructure and finishes upfront.</p>

		<p>residential, the University advises that clarification is provided on the scope of the assessment in order to ensure meaningful assessments can be performed.</p>	
<p>NHS Property Services</p>	<p>No answer</p>	<p>NHSPS supports existing Policy H5 as it seeks to put forward additional standards to deliver high quality housing to be inclusive of greater standards for climate change adaptation and ultimately serves to ensure health and well-being needs are being addressed (Adopted supporting paragraph 4.4.39). As expressed in the proposed update to Policy H5 with the need to adapt existing housing standards in light of the identified need to be better resilient and responsive to climate change, we feel there is also opportunity to address health needs of the local community in promoting healthy design through this policy to better consider health and wellbeing and the wider determinants of health through specific requirements.</p> <p>There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure, enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.</p> <p>The NPPF is clear in stating that “Planning policies and decisions should aim to achieve healthy, inclusive and safe places” (Paragraph 92).</p> <p>Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. On this basis, we would welcome further consideration of healthy design requirements within the Local Plan, and would encourage engagement with the NHS on this matter. Specific policy requirements to promote healthy developments should include:</p> <ul style="list-style-type: none"> • Development proposals to consider local health outcomes • Design schemes to encourage active travel, including through providing safe and attractive walking and cycling routes, and ensuring developments are connected by these routes to local services, employment, leisure, and existing walking and cycling routes. • Provide access to healthy foods, including through access to shops and food growing opportunities (allotments and/or providing sufficient garden space) • Design schemes in a way that encourages social interaction, including through providing front gardens, and informal meeting spaces including street benches and neighbourhood squares and green spaces. • Design schemes to be resilient and adaptable to climate change, including through SUDs, rainwater collection, and efficient design. • Consider the impacts of pollution and microclimates, and design schemes to reduce any potential negative outcomes. • Ensure development embraces and respects the context and heritage of the surrounding area. • Provide the necessary mix of housing types and affordable housing, reflecting local needs. • Provide sufficient and high quality green and blue spaces within developments 	<p>Noted. Change proposed to incorporate a new policy regarding Health Impact Assessment (CC10). Changes proposed to CC7: Design and the Public Realm to encourage consideration of built environment interventions for good health from the earlier stages of planning applications.</p>

Savills (OBO Sorbon Estates Ltd)	No answer	<p>As set out in Section 3 of this statement, whilst the Council's ambitions to be a net zero borough by 2030 is welcomed, any uplift beyond existing and future standards set by building regulations needs to be very carefully considered and the viability of such changes properly evidenced and understood.</p> <p>(See Ministerial Statement given on 13/12/2023). It is clear that building regulations should be statutory mechanism to meet building sustainability standards, to avoid overlap with the planning system and provide certainty for developers.</p>	<p>No change proposed. It is considered that the WMS does not preclude Local Authorities from setting their own energy efficiency standards and states that they may do so if they are "well-reasoned and robustly costed to ensure that development remains viable and that the impact of housing supply and affordability is considered in accordance with the NPPF."</p>
M Langshaw	Y	<p>In addition, it should not be permissible to build any housing units (or create units from existing buildings) without openable windows to the outside.</p>	<p>This is not within the scope of the Local Plan.</p>

Additional representations submitted via email regarding policy H5

Respondent name	Comments	RBC Officer Response
HBF	<p>Whilst the HBF would agree with the Council that there is a need to act to reduce carbon emissions we would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approach across the county in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced. However, if the Council chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences.</p> <p>As such the Council will need to give consideration as to how the requirements of the proposed amendments to H5 are consistent with the written ministerial statement (WMS) published on the 13th of December 2023. In this statement the housing minister notes that <i>"Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes"</i> and that local standards can <i>"add further costs to building new homes by adding complexity and undermining economies of scale"</i>. The 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures:</p> <ul style="list-style-type: none"> • That development remains viable, and the impact on housing supply and affordability is considered in accordance with the NPPF. • The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). • <p>Turning to the first bullet point, the Council will need to ensure the costs and deliverability of this policy are fully and robustly tested. With regard to the costs of the Council's policies the Future Homes Hub (FHH) has undertaken some work to support and inform the implementation of the Future Homes Standard, the findings of which are set out in "Ready for Zero". This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council. The various specifications and costs considered are summarised in Figure 8 of this report and indicates that in order to deliver standards above the FHS on a three bedroomed end of terrace house (specifications CS3, CS4 and CS5 in the FHH report) would be around a 15% to 20% increase in per unit costs compared to the 2021 Building Regulations. Whilst the specifications and assessment methodology may not be directly</p>	<p>No change proposed. It is considered that the WMS does not preclude Local Authorities from setting their own energy efficiency standards and states that they may do so if they are "well-reasoned and robustly costed to ensure that development remains viable and that the impact of housing supply and affordability is considered in accordance with the NPPF." It goes on to specify that any additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version on SAP.</p> <p>Reading's proposed approach is well-reasoned and fully assessed through the Whole Plan Viability Study. Evidence suggests that these standards do not hamper development or present unreasonable costs for developers. In cases in which viability is affected, the proposed exceptional basis clause will apply.</p> <p>This policy approach reflects an approach carried forward by many other Local Authorities. It does not express a percentage uplift of TER using SAP, as this is metric that is increasingly no longer supported by industry and results in significant as-built performance gaps.</p>

	<p>comparable to those being proposed by the Council it provides an indication as to the costs of achieving net zero in residential development.</p> <p>In addition, the Council will need to consider the impact of these policies on both delivery rates and when the proposed site allocations will commence. Given that the standards proposed in H5 are higher than those proposed by Government in the Future Homes Standard, which is expected to be introduced in 2025, they will likely require higher levels of fabric efficiency which will require new skills and materials that may not be readily available, and which could slow delivery the short to medium term as these are developed. It has been recognised by the FHH that to deliver higher standards will require phased transitional arrangements would be needed to steadily build up the skills and ensure quality. The FHH also notes in its report Ready for Zero that even if a short transition period between current standards and those similar to the Council are proposing that this would “... <i>create a high risk of quality problems, inflated costs and, potentially, stalled build programmes.</i>” As such consideration will need to be given as to the delivery rates of development in the early years of the plan period with fewer homes potentially coming forward in this period as these much higher standards will take time to embed.</p> <p>Moving to the second bullet point, the approach proposed by the Council based on energy use is inconsistent with the approach set out in the WMS and as such is unsound. It should be noted that the Government have considered whether it was appropriate to use a delivered energy metric such as the one being proposed by the Council and have concluded that these do not offer any additional benefits to those being taken forward by Government. Therefore, if the Council are to require standards above those required by building regulations must be expressed as a percentage of the target emission rate.</p> <p>The Council are proposing to amend H5 to require developers to use methodologies for assessing the energy performance of new homes against this policy other than SAP. The HBF consider this approach to be inconsistent with the WMS which requires policies, and by extension the assessment of performance against at policy to be based on SAP. This provides consistency in the assessment frameworks for both planning policies and building regulations and ensures there is not a proliferation of assessment frameworks used that adds to the complexity for both applicant and decision maker. This clarification of national policy should be reflected in the requirements to be included in the Energy Statement.</p> <p>The HBF supports the inclusion of the additional paragraph setting out how decision makers should react where a development cannot viably deliver the higher standards being proposed by the Council.</p> <p>Finally, the requirement for applications of 50 or more dwellings to demonstrate a predicted embodied carbon of less than 750-800 kg/m² of carbon within the development for the substructure, superstructure and finishes is not justified. No evidence is provided as to whether this level of reduction is feasible or viable. There are also considerable difficulties and uncertainties in this area with inevitable trade-offs between reducing embodied carbon versus place making design and requirements for renewable energy generation such as photovoltaics. Therefore, if the Council have the evidence to show that the policy is deliverable the Council will need to ensure that all these other policies are consistent with delivering the levels of embodied carbon being proposed. The HBF would also recommend that the policy is sufficiently flexible to take account of those situations where the policy cannot be achieved.</p>	<p>Furthermore, national guidance is contradictory. For example, in 2021, the Future Homes Standard consultation response confirmed that there is no intention to amend the Planning and Energy Act 2008, which means that LAs will retain these powers. Finally, the WMS cannot undermine the primary powers and duties of LAs granted under legislation to combat and mitigate climate change (such as Section 29(1A) of the Planning and Compulsory Purchase Act 2004, the Climate Change Act 2008 and the Planning and Energy Act. RBC cannot adequately fulfil its duties under legislation with policies that result in significant as-built performance gaps or which defer to the energy efficiency standards set in the Building Regulations at this time.</p> <p>RBC would like to emphasise the urgency and importance of addressing the Climate Emergency. If the Council does not pursue ambitious energy efficiency requirements, a net zero Reading will not be achieved by 2030.</p> <p>Requirements for embodied carbon assessments and set limits reflect best practice among other Local Authorities and has been included in the Whole Plan Viability Assessment. As with other elements of the policy, the exceptional basis clause is intended to ensure sufficient flexibility.</p>
<p>HBF</p>	<p>The Council state in paragraph 8.70 that Reading has an ageing population and that it is currently assessing what the needs of older people are. This is welcomed and it will be important for the Council to clearly state what these needs are in the plan, preferably within policy. With regard to meeting these needs the Council will need to, in the first instance, seek to identify and allocate specific sites to meet these needs. If insufficient sites cannot be identified to meet needs, then the Council must ensure that the plan is supportive of such development and does not place onerous restrictions on where and how such development should come forward. The Council will also need to ensure that the viability of such development is robustly tested, taking into account the specific costs faced by developers delivering specialist accommodation for older people such as larger communal and non-saleable areas, general higher build costs due to higher specifications, increased marketing costs and a slower return on investment.</p>	<p>Noted. In general, sites that are identified are suitable for a range of accommodation types, and if the Council were to specify certain sites for older person's housing it is more likely to constrain delivery than anything else, as in our experience residential developments can change substantially before they are delivered.</p>

	The HBF would also disagree with the Council's concern in paragraph 8.73 that the development of specialist accommodation for older people, particularly accommodation that starts from 55 years will simply act to exclude younger people and not provide mixed and balanced communities. This consideration seems to ignore the fact that such accommodation allows more people to downsize and thus free up housing for younger people and families ensuring communities have a wider mix than in some circumstances is currently the case. As such the HBF would not support the proposed change in policy that would require specialist accommodation for ages below 65 to provide further justification to support any application.	The Council continues to have concerns about a cut-off of 55 years, and considers that this should be robustly justified.
Darcliffe Homes	We note RBCs ambitions in response to the climate emergency. While we are generally supportive of the aims of these policies we are concerned by the proposed details, the precise justifications and the potential implication on SME developers, and the implication on the deliverability of small and medium sized brownfield sites, on which RBC rely on to meet its housing targets. We feel much further work is required in terms of the likely implications particularly in this challenging market. Lower threshold and greater flexibility should be set for smaller sites or those beyond the town centre. (See Ministerial Statement given on 13/12/2023).	No change proposed. It is considered that the WMS does not preclude Local Authorities from setting their own energy efficiency standards and states that they may do so if they are "well-reasoned and robustly costed to ensure that development remains viable and that the impact of housing supply and affordability is considered in accordance with the NPPF." The exceptional basis clause is intended to provide sufficient flexibility.

Q. 37 Do you agree that we should update policy H6 as described?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
James Ford	Other	Provision for everyone. The fact this needs to written shows how broken our system is.	Answer is noted. No change needed.
Reading Climate Action Network	No Answer	No opinion	No change needed.
CADRA	Not answered	A greater range of specialist residential accommodation for older people is needed to provide attractive options for those wishing to downsize. This should include units within mixed areas, not just within a complex for older people. There are many benefits from mixed housing.	Answer is noted. The Housing Needs Assessment considers different types of specialist accommodation for older people and the need within Reading. This has fed into the draft policy.
Tricia Marcouse	Not answered	Not sure where this should go. The increase in the elderly population requires changes to the planning requirements generally for new buildings as well as provision of specific elderly care establishments. I'm not sure whether current rules specify 10% of new development should be wheelchair friendly, but it would be good to include this in all new developments that are bungalows or are apartment blocks with ground floor apartments or those with lifts to upper floors. Too many properties are unsuitable for those in wheelchairs, with buggies, with walkers and this can result in people being unwilling or unable to both downsize or get on the housing ladder.	Noted. This is addressed in policy H5, where all new dwellings are required to be accessible and adaptable, and a proportion to be wheelchair accessible and adaptable in line with the Building Regulations.
The Planning Bureau on behalf of McCarthy Stone	N	Although we agree that the Council should update policy H6 Accommodation for Vulnerable People, we do not agree that the policy should be updated in the way described in the consultation documents which implies that the Council will focus the policy towards the delivery of care home bed spaces and away from extra-care housing with little mention of other types of specialist housing for older people. The policy direction consulted on has been recommended without an indication that this is evidence based and therefore not justified. National Policy Context See NPPF paras 60 and 63 In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. (Paragraph 001 Reference ID: 63-001-20190626)	The Reading Housing Needs Assessment has identified the levels of need for a variety of types of specialist provision for older people, covering residential care, housing with care and housing with support. The draft policy outlines the level of need for each and is not specific to residential care only. It is not considered that a standalone policy is required, as the purpose of policy H7 is to address precisely this issue.

	<p>See also Paragraph 003 Reference ID: 63-003-20190626 and Paragraph 006 Reference ID: 63-006-20190626.</p> <p>Therefore, although the Local Plan acknowledges older people, it needs to be recognized in the context of the requirements of the latest NPPF and the additional emphasis this gives to identifying the specific housing needs of older people across a range of typologies.</p> <p>It is well documented that the UK has an ageing population.</p> <p>It is generally recognised (for example, within the Homes for Later Living Report September 2019). That there is a need to deliver 30,000 retirement and extra care houses a year in the UK to keep pace with demand. The current consultation implies that the Partial Update of the Local Plan will update the policy to predominantly consider care bed space. However the specific housing needs of older people now needs to be considered given the additional emphasis in para 63 of the new NPPF.</p> <p>The age profile of Reading can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 20,020 persons aged 65 and over in 2018, accounting for 12.3% of the total population of the Council area. This age range is projected to increase by 10,238 individuals, or 51.1%, to 30,258 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 18.1% of the total population of Reading by 2043.</p> <p>In 2018 there were 5,789 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 4,001 individuals, or 69.1%, to 9,790 between 2018 and 2043. The population aged 80 and over is anticipated to represent a higher proportion of Reading’s residents, accounting for 3.6 % of the total population in 2018 and increasing to 5.9% by 2043.</p> <p>It is therefore clear there will be a significant increase in older people and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan alongside family homes and the council should not disregard extra-care housing.</p> <p>Older Persons’ Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.</p> <p>See the “Healthier and Happier’ report, an analysis of the fiscal and wellbeing benefits of building more homes for later living” by WPI Strategy for Homes for Later Living which explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing.</p> <p>See Silver Saviours for the High Street report: How new retirement properties create more local economic value and more local jobs than any other type of residential housing (February 2021).</p> <p>As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a ‘knock-on’ effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report “Chain Reaction” The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)” reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical</p>	<p>In terms of site allocations, some proposed allocations do specify certain types of housing where there is a particular need to do so, but in general it is considered to be preferable to take a more flexible approach to the types of residential accommodation on individual sites.</p>
--	---	--

	<p>Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market. This is a key point for Reading who are seeking to increase the supply of family sized homes.</p> <p>Social Retirement housing gives rise to many social benefits:</p> <ul style="list-style-type: none"> • Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder • Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns. • The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living. <p>Environmental The proposal provides a number of key environmental benefits by:</p> <ul style="list-style-type: none"> • Making more efficient use of land thereby reducing the need to use limited land resources for housing. • Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions. • Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources. <p>Recommendations The 2018 population projections from the Office for National Statistics shows a large increase in the population over the age of 65. For this reason and the requirements of the updated NPPG and PPG, the Council should ensure specialist housing to meet the needs of older people is addressed positively and that older person's housing is not disregarded in favour of care homes.</p> <p>The best approach towards meeting the diverse housing needs of older people is for the plan to:</p> <ul style="list-style-type: none"> • Identify the older person's housing need through an updated evidence document, that includes assessing the need for retirement housing, housing-with-care and care homes in accordance with the up to date NPPF. • Allocate specific sites to meet the needs of older people that are in the most sustainable locations close to key services. • Include a standalone policy actively supporting the delivery of specialist older people's housing, that includes retirement living, housing-with-care and care homes with good access to services and facilities for older people. <p>Developers of older person's housing schemes should not be required to demonstrate need given the significant need identified and the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments "help reduce costs to the social care and health systems" (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.</p> <p>While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:</p>	
--	---	--

		<p>"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.</p> <p>The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."</p>	
M Langshaw	N	We should continue to allow for plenty of extra care housing.	Noted, although there has been significant recent development of extra care
Iceni (OBO TT Group)	No answer	TTG believes more clarity is needed on the intention of this policy and what type of housing for older people it applies to. Whilst Reading may consider that there has been an oversupply of Extra Care homes in recent years, evidence collected from advisors of TTG suggests that there is still significant demand from retirement operators in the Borough. Ultimately, we have an ageing population and the need to provide suitable, high quality accommodation for older people remains. As such, TTG consider that more work is needed to inform the updates to the policy.	Noted. The proposed policy now includes more detail, drawing on evidence from the Housing Needs Assessment. As a positive need for housing with care has been identified, there is no reference to oversupply of extra care.

Additional representations submitted via email regarding policy H6

Respondent name	Comments	RBC Officer Response
ICB	<p>The proposed changes are due to the change in the ongoing housing needs of this type of housing. The current wording of the Policy sets out that this kind of development should be, where possible, either incorporate or be close to relevant facilities, such as healthcare facilities (as the prospect residents are expected to have a greater demand for primary care facilities when compared to other age group of the population). The ICB however considers that the Policy does not set out clearly how the demand for primary healthcare services can be met. The ICB considers that potential developers should provide robust evidence to identify appropriate mitigation measures to accommodate this extra demand.</p> <p>The ICB The ICB considers that the submission of a HIA would be appropriate evidence to demonstrate the provision for older persons and other specialist accommodation would not exacerbate the capacity of the nearby existing primary healthcare provisions. The ICB should also be consulted in this type of planning application.</p> <p>The ICB has the following recommendation on the wording of Policy H6:</p> <p><i>ii) Development for specialist accommodation for vulnerable people will fulfil the following criteria:</i></p> <ul style="list-style-type: none"> Includes the submission of a Health Impact Assessment (HIA) is to provide an assessment of the impacts of the proposals in healthcare provision and any mitigation measures are identified in the scheme (to include where appropriate the provision of a clinical room within such accommodation) <p><i>iii) Development catering for people with limited mobility will fulfil the following criteria:</i></p> <ul style="list-style-type: none"> Includes the submission of a Health Impact Assessment (HIA) is to provision and any mitigation measures are identified in the scheme (to include where appropriate the provision of a clinical room within such accommodation) 	No change proposed. The introduction of Health Impact Assessments is proposed as a separate policy (CC10).

Q. 38 Do you agree that we should update policy H7 as described to allow for increases in family housing?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
-----------------	------------	----------	----------------------

James Ford	Other	Housing for everyone	Noted. No changes proposed. Housing targets (policy H1) are to be adjusted to reflect up to date needs and capacity.
Christian Harris	Y	Family houses with gardens	No changes proposed. Due to the constrained/urban nature of the borough, high-density development (such as flats, with communal open space), in addition to family-sized housing is often required to suit the needs of the residents, as well as to meet housing targets. Policy H2 and H7 both seek to allow for increases in family housing delivery across the borough to meet the need.
Paul Oliver James Melville	Y	of course there is a need for houses for families not just singles and couples.	Answer is noted. No change needed.
Anthony Acka'a	Other	Yes in suburban areas, no in town centre	Do not agree, no changes proposed. With the town centre likely to make up the majority of housing deliver, there is a strong case to be made for expecting a greater mix of dwelling types in the town centre. This does not however preclude family housing within the suburbs. Policy H2 addresses this.
Damians Bramanis	Y	It's very clear that home ownership is directly correlated with a greater sense of community and improved spaces	No changes proposed. Other types of housing must be offered within the borough such as build to rent as not all residents can afford or want to buy private homes. Such housing products must still comply with policies relating to community cohesion and design/improved spaces (CC7).
RBC Private Sector Housing	Y	No objection to losing small dwellings like HMOs to then become three plus bedroom homes as that is where the identified shortfall is.	Answer is noted. No changes required.

Q. 39 Do you agree that we should update policy H8 as described to address issues with implementation of the policy?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	If improvements are approved then I see no problem. Could just swap to somewhere more suitable though? If it isn't broken don't fix it... Oh, it's been given away on our watch.	It is unclear what is meant by this. The policy updates seek to have greater control on HMO or flat conversions across the borough. The issue is not whether there is an area which is particularly suitable for HMOs but rather the need to adopt a threshold approach throughout Reading to prevent clustering due to its adverse effects on local communities.
Adam Boulding	Other	I think we need to go much harder on HMO conversions. some are hideous living conditions, people are being unsafely stacked and packed into tiny unsafe and unfit boxes with some horrible landlords. I think there needs to be	No changes proposed. Planning applications will be assessed against other relevant

		minimum standards set for HMOs and conversions only allowed where the conversion would meet these minimum standards	policies within the Local Plan (e.g. amenity/internal space standards). Policy is being updated to ensure standards are improved e.g. inappropriate stacking clause.
Reading Climate Action Network	No answer	No opinion	No change needed.
CADRA	No answer	The policy for HMOs and Article 4 should not preclude the addition of other areas which become affected by a growing proportion of HMOs.	No changes proposed. Policy covers areas outside of Article 4 areas which are affected by large HMOs.
Damians Bramanis	Other	I would support much more stringent limitations on the number of HMOs. I believe the areas with the most HMOs are amongst the least pleasant places in Reading. The increase in HMOs is directly leading to the degrading of Reading's public places.	No changes proposed. The policy updates introduce a threshold approach for large HMOs outside the Article 4 direction area. Further restrictions on HMOs may disadvantage the populations it serves e.g. students and/or those who require cheaper, more flexible accommodation.
RBC Private Sector Housing	Y	<p>It's not clear on how this is being addressed or whether the policy goes far enough.</p> <p>Given the need for family homes within the borough, more weight should be given to retaining family dwellings than conversion to smaller dwellings.</p> <p>A garden is often wasted within a HMO where as a family would make use of it.</p> <p>Specifically the point re sandwiched properties - maybe this should only apply when you reach a higher threshold.</p>	<p>No changes proposed. The 50% threshold approach outside Article 4 Direction areas is considered to be sufficient as it would ensure that family housing would not be outnumbered by flats/HMOs and prevents a scenario wherein mixed communities would be harmed or diluted, as per the Residential Conversions SPD. The policy as it stands already places limits on the loss of external amenity space as well as the loss of single-family housing and the updates will strengthen the latter.</p> <p>Policy H7 sets out further measures to retain the existing housing stock and protects the net loss in number of residential units or gross floor area.</p> <p>A clause around inappropriate stacking is deemed necessary in all instances due to the potential for noise and disturbance impacts, particularly in locations where there are thin party walls. Avoiding 'sandwiching' also</p>

			contributes towards maintaining a mixed and balanced community.
CAAC	Y	Agree that the policy be updated in line with the Residential Conversions SPD	Answer is noted. No changes required.

Additional representations submitted via email regarding policy H8

Respondent name	Comments	RBC Officer Response
Ken Oakley	<p>With reference to the current consultation, I would like to suggest an amendment to planning rules for permission to convert family housing to an HMO within Article 4 areas with Conservation Area status.</p> <p>Based on recent experience of a planning proposal, it appears that in the determination of whether the conversion of a family residence to an HMO would breach the threshold of higher density housing within a residential area, the calculation does not include the presence of other properties in the immediate area that have previously been converted from family residences into self contained flats.</p> <p>This can result in the approval of the conversion of a remaining family residence to an HMO in a designated area being approved even where the residential characteristics of a Conservation Area are already under threat from the cumulative impacts of historic flat conversions of family housing into multiple self contained flats.</p> <p>From a policy perspective there seems to be no reason to differentiate between the impacts of HMOs and other conversions of family residences into multi occupancy housing on an area's essential characteristics that are intended to be preserved within Conservation Areas.</p>	No change proposed. It is recognised that there are some limitations to the current threshold policy, but it should be noted that there remains a general clause around unduly diluting or harming an existing mixed and sustainable community, which can be applied even if the 25% threshold is not breached if there is other evidence of the dilution of such a community, such as a particularly significant proportion of conversions to flats.

Q. 40 Do you agree that we should update policy H14 as described to identify specific opportunities for suburban renewal and regeneration?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	End leasehold abuses to the system, Reading is antiquated with awful transport & utility infrastructure, be brave, look at "fit for the future" investment & turn Reading away from the slum it is heading towards & make it somewhere people would want to live.	No changes needed. Matters pertaining to the leasehold system not a planning matter. Updates to transport policies are set out within chapter 9, and infrastructure is discussed within chapter 13 of the LPPU Scope and Content document.
Henry Wright	Y	Heartily support this - a good outcome for current and future residents.	Noted. No change needed.
Abri	Y	Abri supports the proposal to identify additional opportunities for suburban renewal and regeneration as this can have a substantial impact on bringing forward development.	Noted. No change needed.
CAAC	N	Given the confusion as to which areas of Reading are 'suburban' and which 'urban' this policy requires clearer wording.	Agreed. Change proposed. The policy should refer to renewal and regeneration of residential areas to avoid confusion with use of the term 'suburban' in other parts of the Local Plan.
M Langshaw	N	Renewal and regeneration yes, but no increase in housing density.	No changes proposed. Housing density will be required to adhere to density standards set out in H2.

Additional representations submitted via email regarding policy H14

Respondent name	Comments	RBC Officer Response
ICB	<p>The ICB does not have any comments to make related to the proposed changes of this Policy as suggested by the Council. However, the ICB considers that the regeneration projects would not exacerbate the capacity of the nearby existing primary healthcare provisions.</p> <p>The current wording of Policy H14 does set out that there would be adequate community facilities to serve the resulting community. The ICB considers that the wording is too general and some of the infrastructure, such as primary healthcare provision, requires a certain threshold to support a new facility.</p> <p>Due to the viability of the scheme, the provision of a new primary healthcare facility is not always the most feasible option as it is subject to the scale of the renewal and regeneration proposals. Alternatively, a more feasible option is to upgrade the existing GP practices nearby to accommodate this new population. The cost of the upgrade works including any pre-commencement works can be secured by a mean of financial contribution via a Section 106 obligation.</p> <p>The ICB considers that it is important to set out this clearly in the Policy. The ICB does not own any real estates or has any dedicated funding to commission any feasibility study of the projects. To ensure the provision of a new GP facility or the upgrade of any existing GP practices nearby is financially viable and operational, the ICB suggests that Policy H14 should require any potential developers to submit a feasibility study of this provision. The ICB and/or any relevant primary healthcare services providers can be engaged during the commissioning of the feasibility study. The ICB considers that the outcome of such a feasibility study can help inform the viability of the provision in any forthcoming development proposals. The ICB has the following recommendation on the wording of Policy H14:</p> <p><i>Where development would fulfil the above aims, it would generally be supported, subject to other policies in this plan and provided that:</i></p> <ul style="list-style-type: none"> <i>There would be adequate community facilities and infrastructures to serve the resulting community. Developers should undertake a feasibility study of the provision of infrastructure such as primary healthcare facility including the project costing and delivery timescale and relevant infrastructural providers should be informed. If the outcome of the feasibility study sets out that the provision of such facility or infrastructure is not financially and/or operationally viable, other offsite mitigation measures should be funded by developer contributions, to ensure the facilities and infrastructures can accommodate the new population growth.</i> 	<p>No change proposed. It is considered that impacts on healthcare are best dealt with for all types of development within a single policy rather than being referred to individually for every type of development. The proposed policy CC10 should cover this for regeneration proposals as for any other types of development proposal.</p>

Q. 41 Do you agree that a new policy on co-living should be included?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Montagu Evans (OBO Vintage Capital (No.3))	Y	<p>Yes we agree that a new policy on co-living should be included in the emerging Plan. In the Regulation 18 Plan, the Council anticipates co-living proposals coming forward, so a criteria based policy approach should be introduced to ensure future schemes meet policy requirements for size standards and quality of accommodation.</p> <p>However, the Council appears to be considering a criterion of restricting proposals for co-living to sites that are not already identified for general residential, as allocations or permissions, unless the co-living element would be in addition to the anticipated residential. Co-living developments would contribute to meeting the housing target which is not acknowledged by the draft Plan, which instead views co-living as a threat to delivering new residential development to meet Reading’s identified housing needs.</p>	<p>Do not agree, no changes proposed. Should co-living come forward on sites already identified for general residential, then it will make it difficult to meet more pressing general housing needs, such as suitable family sized accommodation (of which there is a shortfall), as well as on-site affordable housing delivery.</p>

		<p>We strongly object to this proposition and the draft Plan should instead provide flexibility over the potential types of residential use that could be found acceptable in the Local Plan. This would ensure the most appropriate use for each site is capable of being delivered and this would ensure the viability and deliverability of sites is secured. In relation to the Site, it is essential that flexibility is retained over potential residential uses and the site allocation should reflect this.</p>	
RBC Private Sector Housing	Other	<p>The reason for a separate co-living designation is not clear, some of the facilities mentioned are already present in some developments. The controls proposed could be applied to many types of development including purpose built student blocks, built to rent etc</p> <p>We are concerned that this policy might be used by developers to circumvent some of the other policies, for example the built to rent policy contains provision for 3 year tenancies, this policy proposes only 3 months.</p> <p>Bedroom sizes should also match (an be applied to) other types of development.</p> <p>The justification for applying the policy to developments 20 bedroom+ is not clear, or why there should be a cut off.</p> <p>The policy proposals around how much co-living/communal space could be applied to any development (including new student blocks, build to rents).</p> <p>The policy should seek to avoid situations where basic facilities (such as cooking facilities) are provided at communal level, this should also not be used to justify reduction of basic facilities within the letting units.</p> <p>The noise impact of different uses within the building should be assessed at the design stage, with appropriate controls through the planning process</p>	<p>Answer is noted. No changes proposed. A separate policy is required due to anticipated planning applications which requires set criteria in place to adequately assess proposals against.</p> <p>It differs from self-contained housing or HMOs through, for example the smaller amount of private individual space provided compared with other forms of development. The design of such establishments ensures a greater provision of shared communal facilities. Therefore, matters such as affordable housing provision and internal space standards will be different. In addition, co-living is generally designed with flexibility in mind, and therefore shorter tenancy agreements are a typical feature, unlike student accommodation. Conversion to self-contained units would require planning permission and would be considered against relevant policies at the time.</p> <p>Bedroom sizes are smaller than that of other housing developments due to the emphasis on shared facilities as described above.</p> <p>A minimum of 20 bedrooms to qualify as co-living is proposed to ensure that it is distinguished from an HMO and to help foster a sufficiently communal environment.</p> <p>Development proposals will be subject to assessment against all relevant Local Plan Policies, including CC8, which requires developments to consider noise and disturbance.</p>
Reading Friends of the Earth	Y	<p>Yes – may have less environmental impact than people continuing in individual homes but don't know if this is supported by research. How does this relate to care homes and sheltered housing?</p>	<p>RBC have not commissioned research to ascertain whether co-living is a more environmentally-friendly way of living. However, the proposed policy would ensure minimal (if any) car parking is allowed, and any development would naturally comprise high</p>

			<p>density living within an urban area, factors known to reduce their environmental impact.</p> <p>There is no link between co-living and care homes or sheltered housing. Accommodation for vulnerable people is dealt within under policy H6.</p>
Savills OBO Viridis	Y	We agree that it would be beneficial for the LPPU to include a policy on co-living.	Answer is noted. No changes needed.
Opus Works (OBO AEW and McLaren (Broad Street Mall))	Y	<p>The provision of a new policy on Co-living within the Local Plan is strongly supported. We provided a summary of some of the benefits of Co-living in our response to Q32 however we set out some further benefits below.</p> <p>Co-living spaces typically offer more flexible lease terms than traditional student housing. Many co-living facilities allow residents to sign short-term leases, ranging from a few weeks to several months. This flexibility can be desirable to those unsure of their long-term plans or who may need to relocate for internships, job opportunities, or other personal reasons.</p> <p>Co-living spaces generally offer a wide range of amenities and services that cater to the diverse needs of their residents.</p> <p>Co-living spaces, on the other hand, often provide private bedrooms and en-suite bathrooms, ensuring a greater degree of personal space and privacy for residents.</p> <p>On larger sites, Co-living can be provided as part of a wider accommodation mix, in turn enabling greater affordable housing and family housing delivery.</p>	Answer is noted. No changes needed.
Savills (OBO Elder)	Y	Our client supports in-principle that a new policy on co-living should be included in the LPPU as there is a clear need for this type of development, as highlighted earlier in this representation. Furthermore, Reading, as a major town with connections to London, is an appropriate and highly suitable location for co-living as an innovative and new housing product, and therefore to guide and steer decision making for co-living proposals there should be a framework.	Answer is noted. No changes needed.
Opus Works (OBO Moda Living)	Y	Moda strongly supports the creation of Co-Living accommodation. Provision of a communal model that increases opportunity for social activity and reduces housing costs within a managed environment can form part of a wider portfolio of housing products available to Reading. It is considered that support for Co-Living will increase housing delivery, provide more affordable housing options to address need, can reduce viability constraints on larger housing schemes and help create vibrant centres with enhanced footfall and associated spend.	Answer is noted. No changes needed.
Opus Works (OBO AEW Core Plus Property Fund)	Y	<p>The provision of a new policy on Co-living within the Local Plan is strongly supported.</p> <p>Co-living spaces typically offer more flexible lease terms than traditional student housing. Many co-living facilities allow residents to sign short-term leases, ranging from a few weeks to several months. This flexibility can be desirable to those unsure of their long-term plans or who may need to relocate for internships, job opportunities, or other personal reasons.</p> <p>Co-living spaces generally offer a wide range of amenities and services that cater to the diverse needs of their residents.</p> <p>Co-living spaces, on the other hand, often provide private bedrooms and en-suite bathrooms, ensuring a greater degree of personal space and privacy for residents. Co-living spaces often have all-inclusive pricing, meaning utilities, Wi-Fi, housekeeping, and access to shared amenities are bundled into a single monthly fee. This can simplify budgeting and eliminate the need to manage multiple bills.</p>	Answer is noted. No changes needed.

		On larger sites, Co-living can be provided as part of a wider accommodation mix, in turn enabling greater affordable housing and family housing delivery.	
Opus Works (OBO Mapledurham Properties Ltd)	Y	<p>The provision of a new policy on Co-living within the Local Plan is strongly supported.</p> <p>Co-living spaces typically offer more flexible lease terms than traditional student housing. Many coliving facilities allow residents to sign short-term leases, ranging from a few weeks to several months. This flexibility can be desirable to those unsure of their long-term plans or who may need to relocate for internships, job opportunities, or other personal reasons.</p> <p>Co-living spaces generally offer a wide range of amenities and services that cater to the diverse needs of their residents.</p> <p>Co-living spaces, on the other hand, often provide private bedrooms and en-suite bathrooms, ensuring a greater degree of personal space and privacy for residents. Co-living spaces often have all-inclusive pricing, meaning utilities, Wi-Fi, housekeeping, and access to shared amenities are bundled into a single monthly fee. This can simplify budgeting and eliminate the need to manage multiple bills.</p> <p>On larger sites, Co-living can be provided as part of a wider accommodation mix, in turn enabling greater affordable housing and family housing delivery.</p> <p>As set out in the Vision Statement supporting this submission, it is the client's intent to provide co-living as part of the development. The rationale for this is clear in that the accommodation, which is located in close proximity to the town centre, station and hospital, provides a good location for key workers at Royal Berkshire Hospital, allowing for more financially-supportive accommodation in walking and cycling distance from the place of work.</p>	Answer is noted. No changes needed.

Q. 42 Do you agree with the proposed policy direction on co-living?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Watkin Jones Group	N	<p>In principle, we acknowledge there is a need for design standards for this important emerging form of housing. Thus, we are generally supportive of the following points:</p> <ul style="list-style-type: none"> • Sui Generis Use: Co-living is considered a sui generis use, requiring planning permission. • Minimum Size: A minimum of 20 bedrooms is set to qualify as co-living, acknowledging Reading's smaller market. • Standards and Compliance: • Tenancy period: A suggested minimum of 3 months. • Management plan: To be secured by a Section 106 agreement. <p>However, we have concerns about the following two points:</p> <ul style="list-style-type: none"> • Communal space: A suggested minimum of 5 sq m per resident. • Room sizes: A suggested minimum of 20 sq m. <p>The suggested standards and compliance for co-living developments, advocating a minimum of 5 sqm of communal space per resident, are not considered unduly burdensome, if inclusive of both internal and external amenity spaces. However, to reinforce the policy, it would be beneficial to clarify the specifics of 'communal spaces' to include both internal and external space.</p> <p>We view the minimum suggested room size of 20sqm as too large and advocate a minimum room size of 18sqm.</p>	<p>Change proposed.</p> <p>The communal space is now proposed to be 4 sq m in line with the policy approach in London, where there is considerably more experience of co-living schemes. However, this should be internal space. Adequate external space is a basic requirement of all types of residential accommodation and is not unique to co-living. The provision of enhanced communal facilities is central to the benefits of co-living, and is important to include.</p> <p>The minimum room size is now proposed to be 18 sq m in line with the policy approach in London.</p>

		<p>Several reasons underpin the soundness of our recommendation, aligning with valuable planning documents and evidence.</p> <p>WJ has meticulously developed a comprehensive design guide, informed by in-depth research into local plans, market data, and collaboration with professionals, including architects, engineers, and building managers, alongside our sister company Fresh. We have recently opened a 133 bed co-living scheme on Gladstone Road in Exeter which has received excellent reviews. This thorough process ensures our design guides incorporate optimized space allocations. Importantly, our optimized design guide avoids unnecessary amenity space and room sizes additions that could escalate costs for residents. Additionally, we wish to emphasize the inherent nature of the co-living product, embodying a familial concept where individuals coexist in close proximity, as a central characteristic of our approach.</p> <p>Greater expectation of levels of communal space may inadvertently contribute to escalating rental costs. This correlation arises from the fact that expanding communal areas and room sizes within co-living developments often entails additional construction expenses, which, to ensure the viability of the scheme will drive rental rates. Given that maintaining affordability is one of the important aspects to this model, any potential risk of further impacting rental affordability must be avoided as far as possible.</p> <p>London stands out as the most mature co-living market in the UK, having the highest number of co-living schemes. Consequently, the GLA has been able to reflect upon this experience in establishing their design standards (which includes a 18 sqm minimum unit size). Moreover, in light of the apparent absence of current or planned co-living schemes in Reading we suggest that a lack of evidence to support 20 sqm minimum unit size would not be found sound due to insufficient evidence to support.</p> <p>We advocate that the allocation and distribution of amenity/common space per resident should reflect the development's size, recognizing the economies of scale at play. Noteworthy is the successful implementation of varied allocations, such as 2-3 sqm per studio, in other co-living schemes across different locations. This underscores the flexibility needed to adapt standards based on the unique characteristics of each project. Communal space standards should be clarified to include both internal and external space within any calculation.</p> <p>We propose reducing the minimum room sizes to 18sqm. This alignment corresponds with our experience and design guides. We are willing to offer further support by providing floor plans that illustrate the adequacy of 18sqm for a comfortable living space.</p>	
RBC Private Sector Housing	Other	<p>It is not clear why standards for co living accommodation should be any different to any other accommodation.</p> <p>Not clear on difference between co-living and build to rent/hmo.</p> <p>Please refer to comments to Q41 also.</p>	No changes needed. Please see officer response to Q. 41. Co-living differs to HMOs and build-to-rent in terms of the size of the private space afforded to individuals and extent of shared spaces, communal facilities provided, absence of self-contained accommodation as well as tenancy lengths.
Reading Friends of the Earth	No answer	<p>Could be more positive – may have less environmental impact than people continuing in individual homes but don't know if this is supported by research.</p>	It is not clear what is being asked here. See officer response to Q. 41.
Savills OBO Viridis	No answer	<p>The proposed policy approach contains a number of criteria which would apply to co-living schemes. Whilst we are generally supportive of the need to include a policy on co-living, we have a number of comments on the criteria:</p> <ul style="list-style-type: none"> - the proposal to restrict co-living schemes to sites that are not already identified for general residential (allocations or permission), unless the co-living element is in addition to the general residential 	No changes proposed. Should co-living come forward on sites already identified for general residential, then it will make it difficult to meet more pressing general housing needs, such as suitable family sized accommodation (of which

		<p>capacity/requirement is not supported. There appears to be little basis for this approach, given co-living dwellings will contribute towards meeting the general housing needs of the Borough and will meet LPPU and national planning objectives to deliver mixed communities.;</p> <ul style="list-style-type: none"> - We support the approach to direct co-living schemes to town centre and edge of centre sites; - We support the principle of the policy including minimum space standards in order to ensure quality of accommodation. However, we note the suggested standards far exceed the Councils' own HMO standards and will need to be evidenced in due course to demonstrate their appropriateness. - We note the proposal that financial contributions will be sought towards affordable housing as set out in the Affordable Housing SPD, but would note there may be some scope to provide, for example, discounted market rent (DMR) affordable housing within co-living schemes, and as such flexibility should be retained to provide for affordable housing either as a financial contribution or on-site. 	<p>there is a shortfall), as well as on-site affordable housing delivery.</p> <p>In terms of HMO standards, co-living is not an HMO and the enhanced communal facilities are a key part of its benefits, and the standards are in place in part to ensure that this distinction is reflected in development on the ground.</p> <p>Shared accommodation such as co-living is not suitable for providing on-site affordable housing due to short term tenancy lets that are not appropriate for those who require stable, long term affordable accommodation, and the fact that co-living is a lifestyle choice that should be chosen rather than enforced by circumstances. In addition, the private units fall below the minimum threshold for internal space standards. However, where self-contained C3 residential affordable units can be provided as part of a development, the policy enables this.</p>
Opus Works (OBO AEW and McLaren (Broad Street Mall))	No answer	<p>We consider that Co-living can offer an innovative and deliverable solution to addressing housing need in Reading. In terms of the policy options, we consider that given the many benefits of Co-living, the Council should adopt a 'positive and proactive approach' to Co-living. The specific Co-living policy should set out the requirements for Co-living (in line with other plans and policies for example; the London Plan), with the criteria ensuring a degree of flexibility to facilitate the delivery of these developments. We consider that through discussions with developers and adoption of a flexible approach to Co-living, the Council can deliver more units and affordable stock and meet its housing need.</p>	<p>Comments suggest more flexibility but have not detailed what this requested flexibility would comprise. Controls must be put in place to ensure that co-living does not conflict with more conventional methods of housing delivery.</p>
Savills (OBO Elder)	No answer	<p>We generally agree with the policy approach described under paragraph 8.92. We consider that the proposed approach strikes the right balance of promoting co-living to town centre locations while setting parameters for co-living developments. We are also supportive of a positive approach to co-living described under paragraph 8.93, however, we acknowledge that there needs to be a form of policy criteria and control to ensure co-living proposals are brought forward in appropriate locations and to an acceptable standard within the Borough.</p> <p>In line with the criteria described by the Council under paragraph 8.92, we address each of the proposed criteria in turn below.</p> <ul style="list-style-type: none"> • That sets a minimum of 20 bedrooms to qualify as co-living; <p>We support and raise no objection to this criteria to ensure a clear distinction between co-living and other alternative housing products, including HMO-type accommodation.</p> <ul style="list-style-type: none"> • That restricts proposals for co-living to sites that are not already identified for general residential, as allocations or permissions, unless the co-living element would be in addition to the anticipated residential; <p>We acknowledge that the Council is seeking to introduce this criteria to avoid co-living competing with Class C3 uses on allocated sites, however we have concerns over the justification for this policy point.</p>	<p>Noted.</p> <p>Should co-living come forward on sites already identified for general residential, then it will make it difficult to meet more pressing general housing needs, such as suitable family sized accommodation (of which there is a shortfall), as well as on-site affordable housing delivery.</p> <p>Shared accommodation such as co-living is not suitable for providing on-site affordable housing due to short term tenancy lets that are not appropriate for those who require stable, long term affordable accommodation, and the fact that co-living is a lifestyle choice that should be chosen rather than enforced by circumstances. In addition, the private units fall below the minimum threshold for internal space standards. However, where self-contained C3</p>

	<p>If a site is located within the town centre, or on an edge-of-centre site (as covered by the criteria below) then this policy criteria should allow for co-living to be justified on sites with residential allocations or permissions on the basis that it is demonstrated that the co-living development would:</p> <ul style="list-style-type: none"> (i) meet an identified housing need; (ii) contribute towards mixed and inclusive communities; and (iii) deliver the same or better quantum of housing delivery or would be in addition to the anticipated residential. <p>The above seeks to ensure the co-living is focussed to the most accessible part of the borough with access to a range of transport options and amenities. However, on allocated sites outside of the town centre, there is sufficient planning control to ensure co-living does not compete or remove these sites from delivering traditional C3 housing. We request the policy is worded appropriately as suggested above to provide a framework to allow for co-living within the town centre or edge-of-centre to be justified and avoid co-living being resisted or unduly challenged where sites may not be suitable, or no longer viable, for traditional C3 residential.</p> <p>As noted, the Council's intention to allow co-living where it would be in addition to the anticipated residential is supported.</p> <ul style="list-style-type: none"> • That otherwise generally directs co-living to town centre or edge-of-centre sites where parking is not required; <p>This criteria is supported as co-living developments generally requires town centre-type locations with good access to public transport, as well as various amenities and services. Directing co-living to town centre or edge-of-centre sites will ensure close proximity to Reading Station, town centre amenities, as well as areas of employment. As a result, car parking will generally not be required in these locations and encourage sustainable living.</p> <ul style="list-style-type: none"> • That sets out standards with which co-living proposals are expected to comply, including a minimum amount of communal space (suggested 5 sqm per resident), minimum room sizes (suggested 20 sqm), a minimum tenancy period (suggested 3 months) and a management plan, with the latter two secured by Section 106 agreement; <p>We agree that any policy should set out standards with which co-living proposals will be expected to comply with, however any standards or accompanying text should ensure that each site and proposal will be considered on its own merits. This is required to ensure that there is flexibility to allow for different co-living brands, products and operations to be acceptable. Equally, co-living can be offer a solution to re-use existing buildings, and therefore, flexibility to ensure the constraints of working with existing buildings or structures is allowed for.</p> <p>We recommend and request that the amount of communal space should be a minimum of 3-4sqm per resident and the minimum room size should be 18 sqm. These standards align and reflect the variety of sizes being delivered by different operators in the market, all of which offer high quality accommodation, as well as those in the planning pipeline for other regional towns and cities (see Appendix 1).</p> <p>In addition, it is important to consider that the requested proposed minimum room size of 18sqm would be significantly larger than HMO locally adopted standards set by the Council, which require a single occupancy room with cooking facilities within the room to have a minimum area of 10.5sqm. This is even before the 3 or 4sqm of communal internal amenity space is added to the 18sqm per resident.</p> <p>The requirements including a minimum tenancy period of 3-months and a management plan, which would be secured by Section 106 Agreement, is supported and considered appropriate for the policy.</p>	<p>residential affordable units can be provided as part of a development, the policy enables this.</p> <p>The communal space is now proposed to be 4 sq m in line with the policy approach in London, where there is considerably more experience of co-living schemes.</p> <p>The minimum room size is now proposed to be 18 sq m in line with the policy approach in London.</p> <p>In terms of HMO standards, co-living is not an HMO and the enhanced communal facilities are a key part of its benefits, and the standards are in place in part to ensure that this distinction is reflected in development on the ground.</p>
--	---	---

		<ul style="list-style-type: none"> That requires a financial contribution towards affordable housing, the basis for which is as already set out in the Affordable Housing SPD <p>It is considered that the emerging policy should be more aligned with the NPPF and allow for the provision of either financial contribution or on-site provision on the basis that co-living is akin to Build-to-Rent as a form of rental housing.</p> <p>See Annex 2 (Glossary) of the for Affordable housing for rent definition See PPG Paragraph: 002 Reference ID: 60-002-20180913 Revision Date: 13 09 2018</p> <p>In our view, the new co-living policy should allow for the ability to deliver affordable co-living units at a discounted market rent, in the same way as Build-to-Rent, or a financial contribution for off-site delivery. There will be sites where on-site provision is more viable and better promotes mixed communities, whilst there will be others where a financial contribution is required. To demonstrate, there are successful schemes with on-site provision in London, such as Folk Earlsfield (ref: 2019/1083), and in locations such as Woking (ref: PLAN/2023/0645) and Exeter (ref:19/1417/FUL).</p> <p>A policy which allows for the consideration of on-site or financial contribution aligns with the PPG Paragraph: 004 Reference ID: 60-004-20180913 Revision Date: 13 09 2018</p> <p>In our client's experience, the provision of on-site affordable rooms is highly successful in providing affordable accommodation for key workers in the area, such as healthcare workers working at Royal Berkshire Hospital. The rooms are typically provided on-site as a tenure blind arrangement, whereby the rooms would be pepper potted amongst the open market units.</p>	
Opus Works (OBO AEW Core Plus Property Fund)	No answer	We consider that Co-living can offer an innovative and deliverable solution to addressing housing need in Reading. In terms of the policy options, we consider that given the many benefits of Co-living, the Council should adopt a 'positive and proactive approach' to Co-living. The specific Co-living policy should set out the requirements for Co-living (in line with other plans and policies for example; the London Plan), with the criteria ensuring a degree of flexibility to facilitate the delivery of these developments. We consider that through discussions with developers and adoption of a flexible approach to Co-living, the Council can deliver more units and affordable stock and meet its housing need.	Comments suggest more flexibility but have not detailed what this requested flexibility would comprise. Controls must be put in place to ensure that co-living does not conflict with more conventional methods of housing delivery.
Opus Works (OBO Mapledurham Properties Ltd)	No answer	We consider that Co-living can offer an innovative and deliverable solution to addressing housing need in Reading. In terms of the policy options, we consider that given the many benefits of Co-living, the Council should adopt a 'positive and proactive approach' to Co-living. The specific Co-living policy should set out the requirements for Co-living (in line with other plans and policies for example; the London Plan), with the criteria ensuring a degree of flexibility to facilitate the delivery of these developments. We consider that through discussions with developers and adoption of a flexible approach to Co-living, the Council can deliver more units and affordable stock and meet its housing need, particularly in relation to new entrants to the market and key workers.	Comments suggest more flexibility but have not detailed what this requested flexibility would comprise. Controls must be put in place to ensure that co-living does not conflict with more conventional methods of housing delivery.

Additional representations submitted via email regarding co-living

Respondent name	Comments	RBC Officer Response
ICB	While the ICB understands that this type of residential accommodation is mainly for younger people, it will inevitably have an impact to the nearby GP practices, where most of the GP practices are already at or over capacity in Reading. While this type of residential accommodation will provide a wide range of onsite facilities, the ICB considers that there is an opportunity to require developers to reserve a multi-purpose venue within the building for medical and clinical use from time to time.	No change proposed. It is considered that impacts on healthcare are best dealt with for all types of development within a single policy rather than being referred to individually for every type of development. The proposed

	<p>If the development proposals cannot provide such facility, the ICB considers that other offsite mitigation measures should be provided to ensure the existing GP practices can accommodate the new population growth. While the ICB appreciates that it is a new policy to be added to the Local Plan, the ICB has the following recommendation on the wording of this new Policy:</p> <ul style="list-style-type: none"> • <i>Developers should provide an onsite medical and clinical facility, which can serve the new residents. If the development proposals cannot provide such facility, other offsite mitigation measures should be provided funded by developer contributions, to ensure the primary healthcare provision can support the new population growth.</i> 	<p>policy CC10 should cover this for co-living proposals as for any other types of development proposal.</p>
<p>TVP</p>	<p>Co-living developments could be particularly problematic in terms of providing adequate physical security. A resident should feel safe and secure in their own home which is potentially harder to achieve when the purpose is to provide a more communal way of living. Co-living puts emphasis on the community aspect encouraging the use of lounge and kitchen areas for not only residents but their guests introducing a high level of anonymity and activity that could support those intent on crime and anti-social behaviour. In addition, co-living also introduces activities that would be attractive to those without a legitimate right to use them. For example, gyms, cinema rooms, providing a further draw to try and gain un-authorized access.</p> <p>An additional section should be provided with applications of this type, highlighting the need to address physical security within co-living developments. A robust access and security strategy should accompany this type of application ensuring the private residential areas of the development are not undermined by the communal aspect. This should be addressed in the early design stages of a development and should not solely fall back to management processes. For example, concierge facilities cannot address all aspects of crime and anti-social behaviour effectively. They cannot be expected to provide effective live monitoring of all formal surveillance, deal with personnel movements to and from the building, meet and greet suppliers, monitor postal procedures as well as other administrative duties. Furthermore there is always the potential for modifying the concierge service as a cost cutting exercise at a later date leaving the development vulnerable</p>	<p>Agreed. Change to policy wording proposed to ensure that a security strategy is provided with the application, setting out how crime and antisocial behaviour will be mitigated through design and security measures.</p>
<p>Savills (OBO Elder)</p>	<p>Co-living is being delivered and meeting a growing need for more flexible and affordable rental housing stock in comparable locations to Reading, such as Brighton, Portsmouth, Woking, Exeter, Guildford, and Bristol. Based on Savills research published in May 2023, the total number of co-living units in the UK, either existing or proposed, is now 25,021, with 3,422 operational and 21,599 in the pipeline. The total size of the sector, combining both operational beds and pipeline, has nearly trebled since 2019.</p> <p>House prices in Reading are expensive, and therefore, co-living can assist by providing further choice to the housing offer alongside HMO-type accommodation and Build-to-Rent. In particular, providing choice to first time buyers as a product that can assist them in saving for a deposit while renting. In Reading, the average home was priced at £365,000 in the year to August 2023. This is 65% higher than 10 years earlier. With a 10% deposit (£36,500), an income of £73,000 would be needed to afford the average priced home. These high values make home ownership and 'getting on the ladder' extremely difficult for first-time buyers (Source: HM Land Registry).</p> <p>Whilst Build-to-Rent products, or private rented accommodation may already exist in Reading, the number of listings for rental accommodation was down 34% in Q3 2023 compared to the 2017-2019 average (Source: Rightmove). This has led to rental values growing by 24% since March 2020, which is double the South East average of 12%.</p> <p>The combination of the above indicates and supports that there is a growing need for an all-inclusive and flexible rental product that provides higher quality housing as a choice when compared to HMO-type accommodation, whilst meeting the growing need for private rented accommodation in the Borough. Co-living will also, as a result of the c. 20% discount when compared to the 'all-in' cost of traditional Build-to-Rent, assist with helping residents save more effectively to support ambitions for home ownership.</p>	<p>Answer is noted. No changes required.</p>

<p>Nexus (OBO Reading Heights Ltd)</p>	<p>See NPPF paragraph 61. The Consultation (paragraph 8.5) presents that that Council is considering whether or not an alternative approach to the standard method would be justified. If this was to be progressed further, supporting evidence would need to be clear and robust against the ‘exceptional’ threshold of the Framework. If the Council was to seek a housing requirement below the standard method, such evidence is particularly important given the Government’s objective to significantly boost the supply of homes, the need for residential accommodation to support Reading’s vibrant economy, and the recognition of Reading as a highly sustainable location.</p> <p>Currently, evidence does not exist in the public domain and therefore it is not possible to ascertain if any locally derived needs figure (lower than the standard method) is accurate or robust.</p> <p>The Framework requires that the needs of groups with specific housing requirements are addressed (paragraph 60); and when establishing housing need different groups in the community should be considered (paragraph 63). Such groups include younger people, people who wish to rent their homes, people who may live in a location for only work related reasons, and people who seek more affordable accommodation.</p> <p>The need of these particular groups is already understood by the Council, as reflected in the current Reading Borough Local Plan (adopted November 2019). Policy H8 relates to the conversion of buildings (primarily large dwellinghouses) to houses of multiple occupation (HMO) and recognises that such conversions have an important role to play in Reading.</p> <p>This contribution is reinforced by the Planning Practice Guidance (“the PPG”).</p> <p>The Housing Delivery Test measurement rule book (July 2018) confirms that for ‘communal accommodation’, not student accommodation, the ratio to be applied is based in the average number of adults in all households, with a ratio of 1.8. I.e. every 18 co-living bedroom spaces equates to 10 dwellings.</p> <p>In term of raising the quality of accommodation, co-living is also important. Unlike the disbenefits that the adopted Local Plan identifies with existing HMO accommodation – the subdivision of larger, older buildings, the loss of family housing, disruption of the character of existing neighbourhoods, and provision of poor amenities for residents (internal conditions, open space, bin and cycle storage) – purpose built and professionally managed co-living development in appropriate locations would avoid such impacts.</p> <p>Co-living in suitable central locations would also significantly reduce the pressure on the existing stock of larger family houses in more suburban parts of the borough. Such larger homes are better suited for family accommodation, with the Consultation presenting that securing family accommodation in the town centre environment is extremely challenging.</p> <p>In respect of demographic and other influences on the type of housing required, Reading Heights’ market understanding is that there is a substantial demand for co-living tenures. It is noted that a revision / update to the Council’s Strategic Housing Market Assessment is not yet available.</p>	<p>Answer is noted. No changes required.</p>
<p>Nexus (OBO Reading Heights Ltd)</p>	<p>Against the background of need and demand for flexible residential accommodation in Reading and where traditional HMO provision has resulted in significant harm to suburban areas, a specific coliving policy in the Consultation is welcomed in principle.</p> <p>By way of further context to co-living accommodation, Reading Heights presents that:</p> <ul style="list-style-type: none"> • it is a purpose-built, flexible, rented, large-scale housing model, with residents having access to their own self-contained apartments (of varying sizes) and shared amenity space within the building in the form of living areas, workspaces, as well as perhaps gym facilities and cinemas; • whilst co-living is a relatively new concept, demand and planning applications for bed spaces have surged since the Covid-19 pandemic in 2020. Residents find co-living an enticing / attractive offer due to the associated social and interactive lifestyle; and 	<p>Noted.</p> <p>In terms of the minimum threshold, the market for and experience of co-living in Reading is minimal, but it is likely that developments in Reading may be smaller than in larger cities. It may be that 20 bedrooms is too low to deliver a co-living scheme, but if this is the case then such proposals will not be brought forward in practice.</p>

<p>• co-living includes longer term accommodation, promoting a more stable community, where residents would have an assured short term tenancy agreement, often with a minimum length of stay.</p> <p>In Reading, there is a clear and growing demand / need for co-living, with people preferring this model as opposed to renting poor quality HMO space, often having to deal with unreliable landlords.</p> <p>The preferred co-living policy option in the Consultation presents a minimum size threshold of 20 bedrooms for co-living development. Reading Heights considers this threshold may be too low to viably achieve a sufficient range / standard of communal facilities and level of management necessary to ensure a high quality development. Instead, a minimum 40 bedroom size is more appropriate for development to successfully operate with the facilities and standards expected.</p> <p>Reading Heights would support the minimum private (20sqm) and communal space (5sqm) standards in the preferred policy approach, as well as a minimum three-month tenancy period.</p> <p>Likewise, there is support for the preferred spatial limitation, for co-living to be provided only in more accessible locations in Reading, where there is greatest access to employment, amenities and public transport.</p> <p>However, Reading Heights is fundamentally concerned that the preferred policy seeks to exclude coliving development on sites that are <i>“identified for general residential, as allocations or permissions”</i>. This approach is too blunt without provision to be able to consider matters that may be highly relevant as to whether or not a specific site is suitable for co-living development. For instance, on a site that may have been promoted for Class C3 housing, there could be a range of reasons why such development has not been delivered – including financial viability; rapid changes to the urban context; and / or Reading’s dynamic socioeconomic and demographic influences.</p> <p>It is also the case that many sites in central Reading have already been promoted for residential development, at very least through the Council’s call for sites exercise.</p> <p>Where co-living development would contribute towards the Council’s housing supply as well as meeting a demonstrable need, the current preferred policy wording unnecessarily risks sterilising an otherwise suitable site. Consequentially, the preferred policy wording would prohibit the ability to regenerate and make effective use of previously developed land, contrary to paragraphs 123 – 126 of Framework.</p> <p>Co-living accommodation is a form of housing and should not be considered instead of the more traditional model of dwellings, but as a complementary form of accommodation to meet the growing demand from people who would choose not to live in self-contained homes and are deterred from traditional HMOs because of their poor standards.</p> <p>For the preferred policy to meet the tests of soundness the criterion prohibiting co-living development from where there is a legacy of a site being promoted for Class C3 residential should therefore be deleted.</p>	<p>Should co-living come forward on sites already identified for general residential, then it will make it difficult to meet more pressing general housing needs, such as suitable family sized accommodation (of which there is a shortfall), as well as on-site affordable housing delivery.</p>
---	--

Additional representations on housing matters submitted via the questionnaire

Respondent name	Comments	RBC Officer Response
-----------------	----------	----------------------

<p>Adam Boulding</p>	<p>Please, regulate Airbnb's and short term lets. As to many other local authorities and cities, where short term lets and "Airbnb un-authorized hotels" are taking over and removing housing stock, foreign and distance buyers are buying up flats and homes with the sole intention to use as a hotel, through booking.com and Airbnb, operating hotels without any health and safety, permission from freeholders, no consideration of communities and neighbours, and removing hundreds of homes and apartments from the Reading area housing stock which should be owner occupier or rented. making rents more expensive and removing stock. Other cities and areas have now started to make policies to stop this, requiring hotel lets (short term lets such as Airbnb) to register with the local authority, provide evidence of insurance, electrical, fire and gas safety, permission from building owners or freeholders that a business and hotel can be let, and proof that they are paying the appropriate business licences and taxes on income to the government and local authority. Airbnb's are hurting the local housing stocks. they are hurting communities. they are causing nuisance and anti-social behaviour.</p>	<p>No changes proposed. Although comments are noted, the creation of short-term lets are not considered to be a proliferating issue within Reading that is affecting its housing stock to the extent that a policy to restrict growth is needed.</p> <p>Furthermore, central government are introducing planning measures to provide local areas with more control over the future growth of short term lets, plus a new use class and associated permitted development rights which will help to address the issues as outlined in the representation.</p> <p>H&S and freeholder permissions are matters beyond the remit of planning policy. Any issues relating to noise and nuisance would be dealt with by the Environmental Health team.</p>
<p>WBDC</p>	<p>Gypsies and Travellers: We note that RBC is not seeking to update its Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA). WBDC needs to deliver three Gypsy and Traveller pitches in the short term, and a further 17 to meet needs up to 2038. WBDC also needs to allocate at least four transit pitches, which will house 8 caravans. The allocations included within the Council's existing Local Plan are being rolled forward into the LPR and no additional sites are proposed. WBDC has commenced work on a Gypsy and Traveller Accommodation Development Plan Document (DPD) which will contain policies and allocations to meet the Gypsy and Traveller accommodation needs. A 'call for sites' was held at the end of 2023, and one site was promoted. A Regulation 18 consultation will take place in spring 2024, and it is anticipated that the DPD will be adopted in September 2027. As part of the Duty to Cooperate, WBDC will continue to liaise with RBC as work on the DPD progresses and will advise whether it will be possible to meet needs within West Berkshire district or not.</p>	<p>Noted. No change needed.</p>
<p>Damians Bramanis</p>	<p>I support introducing a requirement for minimum sizes for bedrooms and housing, to ensure a level of quality rather than a 'race to the bottom' from property developers building tiny, cheap homes.</p> <p>I hope that this plan can help stop the destruction of Reading's character with soul-less cheap flats. I believe there should be a mechanism that requires buildings with architectural interest, beauty, and some lasting value that contributes to the public character of Reading</p> <p>I believe that there should be a stronger focus on building the community of Reading. In terms of planning, this would be encouraged by having home owners who reside locally, shared community spaces like playgrounds, parks, courtyards, outdoor seating, and gathering places, and more interest (e.g. artwork, leisure, installations) at street level.</p> <p>The homeless encampments around Reading are a massive and growing problem that is not adequately addressed. This seems to only be addressed by building cheap accommodation. There should be further planning considerations to combat the scourge of homelessness - not simply build cheap, horrible houses</p> <p>I believe there should be far more stringent planning considerations to limit HMOs, buy-to-let, or other commercial style developments, and instead encourage far more owner-occupiers. I believe the plan should actively target increasing the number</p>	<p>No changes proposed. All development must comply with the high-quality design standards as set out in policy CC7 (and CR2 if in Central Reading). Updates to policy CC7 require development to incorporate the National Design Guide and National Model Design Code which addresses much of these concerns.</p> <p>Geographical location of homeowners / renters is beyond the control of planning.</p> <p>Work is underway to assess the updated level of affordable housing need and the council understands that securing affordable housing is</p>

	<p>of home owners, and decrease the number of landlords. It's clear that areas of Reading dominated by landlords are the worst places to live - there are clear maintenance issues, litter, and slow rot over time. Whereas the areas dominated by home owners are far more pleasant community places to live. I fear that Reading will become a town dominated by landlords who live far away, and think of housing as an 'investment' rather than a home.</p> <p>The need for spaces for children, teenagers, leisure, and community building are sadly lacking. I'd like to see more investment in community spaces. They don't need a lot of infrastructure.</p>	<p>essential. All affordable housing must comply with relevant local plan policies such as quality and design.</p> <p>A variety of housing products must be available to residents who may not be able to afford, or do not want to buy private homes. The management of rented properties is beyond the scope of planning.</p> <p>The LPPU is proposing to update policy RL2 to assess the latest needs to retail, leisure and cultural uses.</p>
--	--	--

Chapter 9: Transport

Q. 43 Do you agree that we should update the transport policies listed? (TR1, TR2, TR4, TR5)

Respondent name	Y/N/Other	Comments	RBC Officer Response
Paul Oliver James Melville	Y	<p>aM RATHER ANGRY TO SEE SO MANY CYCLE LANES EMPTY FOR MOST OF THE DAY.i APPEARS TO ME THAT CYCLISTS EITHER USE FOOTPATHS OR CYCLE IN THE COUNTRYSIDE AT WEEKENDS.</p> <p>So, less of those, fix potholes which are dangerous to all road users.</p> <p>As for bus lanes I am afraid it will just lead to more congestion.</p> <p>Build the third bridge and if a neighbouring authority objects penalise traffic coming into the town from the that authority.</p>	<p>No changes proposed. The use of cycle lanes, installation of bus lanes and fixing potholes is a matter beyond the remit of planning policy. RBC has clarified its position in support of a Third Thames Crossing. The Local Transport Plan (2040) can be viewed for further information on the above matters.</p>
Reading Friends of the Earth	Y	<p>Yes. Should address e-bikes, e-scooters, and possibility of public transport run from overhead cables or hydrogen to reduce need to use batteries which add to weight of vehicles so using more energy, more PM2.5, and more charging time.</p>	<p>Comments are noted, however, no changes proposed. Regulation of e-scooters and e-bikes is beyond the remit of planning policy. Overhead cables is a transport/highways matter and futureproofing forthcoming public transport schemes is discussed within the Local Transport Plan (2040). The use of hydrogen is</p>

			also discussed, however, it does not comprise the main focus in the short/medium future due to availability. See Local Transport Plan for further information on such matters.
Savills (OBO Sorbon Estates Ltd)	Y	Yes. The policies listed should be updated and brought in line with the NPPF and relevant guidance.	No changes proposed. It is not clear what NPPF guidance this comment refers to.

Q. 44 Do you agree with the proposed updates to policy TR1 to reflect the Local Transport Plan (2040)?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Paul Oliver James Melville	Other	as above	See officer response to Q. 43.
TVCC	Y	We agree.	Answer is noted.
Savills (OBO Sorbon Estates Ltd)	Y	It is broadly agreed that the policy should be updated to reflect the Transport Strategy and make the appropriate cross-references where necessary, to promote sustainable transport options. Site SOU1 – Reading Link Retail Park is in a sustainable location; close to public transport nodes; the cycle network; the centre of Reading and the strategic road network. Therefore, is well placed to support and deliver in line with the strategy.	Answer is noted. No changes required.

Additional representations submitted via email regarding policy TR1

Respondent name	Comments	RBC Officer Response
Tony Carr	<p>I would fully support the overall visions and objectives identified for cycling in both the Local Plan update as well as the Transport Strategy and would agree that these should be made consistent across both plans. Also, it must be emphasised that many of these initiatives to support cycling would also benefit those walking as well micro-mobility users.</p> <p>An increase in cycling would contribute towards the strategic objectives identified in the Transport Strategy that would support the Local Plan update</p> <ul style="list-style-type: none"> • Increased levels of cycling will support improvements in air quality • Increased levels of cycling will support reductions in traffic congestion • Cycling supports good accessibility to local facilities and employment • Cycling provides affordable and accessible travel for all • Cycling supports healthier lifestyles • Cycling supports new development, especially for those locations that are poorly served by other travel modes • Cycling is adaptable for the future, especially with increased use of electric bikes, bikes to carry children and cargo bikes <p>There are however concerns about the delivery of cycle schemes and initiatives due to reducing Government support for Local Transport. Alternative sources of funding should therefore be considered including increased levels of support from developers, both in terms of financial contributions as well as direct provision of facilities.</p>	<p>Answer is noted. No changes proposed. The objectives that will be inserted into this policy are taken directly from the adopted Local Transport Plan (2040) to ensure consistency and integration between the two documents.</p> <p>The delivery of cycle-related infrastructure and schemes can be dealt with by way of financial contributions which will be considered on an individual basis the planning application stage in the case of S.106 contributions, and/or could come forward via CIL funding of which a large portion gets allocated to transport and travel. However, these matters are beyond the scope of the LPPU and policy TR1.</p>

<p>SODC & VOWH</p>	<p>Updates for Policy TR1 are suggested to include objectives to align with the new Reading Local Transport Strategy (LTP), the objectives of the LTP we agree with and we support the updates. However, we feel that some of the identified schemes in the LTP do not support the objectives and do not appear to align with the climate emergency.</p> <p>Notably this relates to inclusion of a new Caversham orbital road with a River Thames bridge crossing and the strategic scale park and ride sites.</p> <p>The road and bridge falls entirely outside of RBC's boundary, and largely in South Oxfordshire. As previously advised, we would only support a scheme in this location for active travel and bus routeing, owing to anticipated induced demand from nearby motorways.</p> <p>RBC's supporting materials for the proposed park and ride sites still promote large scale strategic car parks for bus interchange with cars only, as opposed to Oxfordshire County Council's new approach to mobility hubs. We would welcome a more considered approach which seeks to promote active travel and more sustainable use of land.</p> <p>Furthermore, the partial review states that "only infrastructure needed to support sustainable growth has been identified within the following schedule" and provides a table of Infrastructure Delivery Plan schemes. The list includes the Cross Thames Travel scheme which is wholly outside of your local authority boundary, and as such should not be considered as a fundamental infrastructure requirement to deliver RBC's growth.</p> <p>In summary...South Oxfordshire District Council continues to object to the transport infrastructure schemes sought in the LTP which fall outside of RBC</p>	<p>No changes proposed. The Council's position remains as is regarding Cross-Thames travel and is set out in more detail within the Local Transport Plan (2040).</p> <p>The design of the new bridge, including whether it should accommodate private vehicles, is yet to be confirmed. RBC is aware of SODC's preferences and is currently undertaking joint working on this matter. The specific detail of the additional bridge is not within the scope of policy TR1.</p> <p>The introduction of Park and Ride mobility hubs in the north and west will increase public transport capacity into the town, lead to reduced congestion and improved air quality, and reduce the reliance on the private car for journeys into Reading, freeing up space on the roads for cycling. The specifics of the mobility hubs i.e. car parks for bus interchanges is a transport matter and beyond the scope of the LPPU although any future planning application will need to ensure that it meets the Council's sustainability policies and parking standards.</p> <p>Although the Cross-Thames Travel scheme is outside of the RBC boundary, it is of relevance given that it would significantly affect transport movements within the borough. In addition, a collaborative approach between local authorities is considered to be the best way forward.</p>
<p>OCC</p>	<p>Oxfordshire County Council (OCC) adopted our fifth Local Transport Plan, called the Local Transport and Connectivity Plan (LTCP) in July 2022. The LTCP outlines our vision to deliver a net-zero transport system, reduce car trips and make walking, cycling, public and shared transport the natural first choice. These principles will guide our partnership working on cross-boundary transport matters moving forward.</p> <p>With regards to a third Thames crossing, we would like to reiterate that the motion approved by Oxfordshire County Council on 10th September 2019 remains our position on a third Thames crossing:</p> <ul style="list-style-type: none"> • Should a new bridge be built it should be restricted to public transport, cyclists and pedestrians. • The bridge and necessary mitigation measures must not be considered as two separate projects, but as one project. <p>We would also like to highlight that OCC do not have any funding for a third Thames crossing and the majority of any river crossing would be within Oxfordshire's (and South Oxfordshire District Council's) boundary. Likewise, planning consent for any bridge would be entirely out of RBC's control and would require planning applications to OCC and/or South Oxfordshire District Council and Wokingham Borough Council.</p> <p>We support the inclusion of a more holistic approach to cross-Thames travel and fundamental review of options to enhance sustainable travel choices. We ask that OCC continue to be engaged with on any future work.</p>	<p>No changes proposed. As set out in the Local Transport Plan (2040), RBC is aware of OCC's preferences and is currently undertaking joint working on this matter. The specific detail of the additional bridge is not within the scope of policy TR1.</p> <p>Although the location for the third Thames crossing is situated outside of the RBC boundary, it is of relevance given that it would significantly affect transport movements within the borough. In addition, a collaborative approach between local authorities is considered to be the best way forward.</p>

	Please see our recent response to Reading Borough Council's Local Transport Plan 4, dated 20th December 2023 for further details of our view on transport matters. Within this response we note general support for the vision, objectives and policy approach within the Reading Local Transport Plan (2040), but we have significant concerns about the proposed schemes and measures for cross boundary travel included in the strategy and therefore oppose the plan on these grounds.	
--	--	--

Q. 45 Do you agree with the proposed updates to policy TR2 to show an updated list of major transport projects?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
James Ford	Other	Need to add motorcycles.	Do not agree. No change proposed. It is unclear what is intended by this comment. Motorcycles do not fall within any existing or future major transport projects.
R K Lambra-Stokes	N	<ol style="list-style-type: none"> 1. The update should mention the removal of Priority Build-Outs (such as on Redlands Road) which increases the hazards for cyclists and busses, increased congestion and impacts the performance of ambulance times to A&E at the hospital. 2. The update should mention the support to a direct rail link to Heathrow. Given that the Borough hosts many international HQs, Public transport links to the international hub should be supported. 3. The update should mention the support to an additional road bridge across the Thames to reduce city centre congestion. 4. The update should mention the lack of circular public transport routes e.g. between green park and Earley 	<p>No changes proposed. Some suggestions are not within the remit of planning policy nor do they comprise a major transport project as listed in the adopted Local Transport Plan (2040).</p> <p>Discussions on the proposed Western Rail Link to Heathrow, including RBC's position on this is set out within the adopted Local Transport Plan however it does not comprise a major transport project within Reading Borough.</p> <p>Support for a third Thames Crossing is set out in the LPPU and discussed further within the Local Transport Plan.</p> <p>Lack of circular public transport routes does not comprise a major transport project.</p>
Paul Oliver James Melville	Other	see answer above.	See officer response to Q. 43.
Reading Friends of the Earth	No answer	Bus Rapid Transit from Thames Valley Park should run along A4. Cross Thames Travel should be deleted – or east Caversham access road should be shown as well.	<p>No changes proposed. The location identification of a BRT route is beyond the remit of planning policy. Further detail on BRTs can be found within the adopted Local Transport Plan (2040).</p> <p>To ensure consistency with the adopted Local Transport Plan, support for the new river crossing will be retained within the LPPU.</p>
Historic England	No answer	As a general comment, we encourage the consideration of opportunities to enhance appreciation of or access to heritage assets when considering proposed transport improvements. Of the new proposed transport projects listed in paragraph 9.13, we flag that the main building of Reading general station is Grade II listed, which should inform enhancements to the interchange proposed.	Answer is noted, however, no changes are proposed. The purpose of Policy TR2 is to identify and prioritise major transport projects as set out within the adopted Local Transport Plan (2040). It does not include detail on what considerations (such as heritage) should be accounted for but provides a broad overview on the principle of these transport projects and the safeguarding of

			land where necessary. Nonetheless, the adopted Transport Strategy (2040) sets out that environmental constraints, such as heritage, will be protected and promoted, and that such constraints will be taken into account in the development and delivery of all infrastructure schemes which will be supported by relevant assessments. Any heritage considerations will also be addressed with at the planning submission stage.
TVCC	Y	We agree.	Answer is noted.

Additional representations submitted via email regarding policy TR2

Respondent name	Comments	RBC Officer Response
Transport for London	<p>We note from paragraphs 9.11 and 9.15 that you propose removing the reference to Crossrail safeguarding from the supporting text and the proposals map. The current position is that from 2022 when the Elizabeth line was opened, TfL has taken on the role of safeguarding authority. As acknowledged in 9.11 the safeguarding has not been revoked and so it should remain in the Local Plan until formal changes are made to the safeguarding directions. We recommend that for the time being the safeguarding remains as marked on the proposals map but in the supporting text it is updated to state that TfL is now the safeguarding authority.</p> <p>The Crossrail safeguarding team at TfL are in discussions with Department for Transport (DfT) with a proposal to have the safeguarding directions reviewed and revised to align with the process adopted by the TfL Infrastructure Protection Team for the wider TfL network. As soon as they have a response from DfT, they will inform all the local planning authorities affected by the directions of any changes required.</p>	Agreed. Safeguarding direction will be retained within supporting text and proposals map.

Q. 46 Do you agree with the proposed updates to policy TR4 to reflect the LCWIP?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Adam Boulding	Y	but, i think you should add in a policy to ban E-Scooters and bikes and regulate their use further in RBC, they are being used for crime, anti-social behaviour and dangerous driving and intimidation and dangerous to children and the elderly pedestrians	No change needed. Although it is acknowledged that e-Scooters and e-bikes can pose a safety risk on road users, their use not a planning or development consideration. Further discussion on e-scooters can be found in the adopted Local Transport Plan (2040)
Henry Wright	N	LCWIP is not strong enough on segregation - the local plan should include a presumption for segregated routes within all town centre development introducing highways.	No changes proposed. Segregated cycle routes are a transport/highway matter. It is discussed within Policy RTS15 of the adopted Local Transport Plan (2040).
Damians Bramanis	Y	Yes. However, I don't think this goes far enough. I believe there should be significantly increased investment in increasing Reading's bicycle infrastructure, even if it disadvantages cars and traffic, to encourage more cycling.	Answer is noted. No changes proposed. This matter is beyond the remit of planning policy. For further discussion on such see RBC's adopted Local Transport Plan 2040.

Sport England TOWN	Y	this seems logical	Answer is noted. No changes needed.
	Y	On q.46, we support the proposed changes to policy TR4, noting the opportunity for development sites outside the boundaries of Reading to connect into strategic and other cycle routes and offer enhanced accessibility for employment or accessing education, health and other facilities as well as leisure opportunities.	Answer is noted. No changes required.
Tricia Marcouse	No answer	In many cases, the cycle routes and green routes coincide across Reading. Where they do not, then the strategy for tree planting should include cycle routes as well as green routes since providing shade for cycling will become more and more necessary in the future.	No changes proposed. See policy EN14 for updates on RBC's tree policy.
Savills (OBO Sorbon Estates Ltd)	Y	Yes. The policies map and policy should be updated to reflect the Local Cycling and Walking Infrastructure Plan (LCWIP) and 5 types of cycle routes set out therein. Site SOU1 – Reading Link Retail Park is located in a key location to promote and connect to the cycle network set out in the LCWIP. It is located adjacent to the 'strategic' shared surface cycle path adjacent to the A33 serving the Town centre, and also the 'local' route to the north on Rose Kiln Lane. It is also adjacent to the 'leisure' routes that run to the west across the meadows and only 250m south of the 'orbital' National Cycle Network (NCN)(Route 422) at Berkeley Avenue. Therefore, the site is extremely well placed to promote cycle use and connectivity to the network.	Answer is noted. No changes needed.

Additional representations submitted via email regarding Policy TR4

Respondent name	Comments	RBC Officer Response
Pang Valley Group (Ramblers Association)	<p>In May 2017, The Borough Council put to public consultation a proposal to alter the status of the Thames Path from a footpath to a joint footpath and cycleway. I made representation on behalf of the Pang Valley Rambler Group of the Ramblers' Association and a copy of that representation is attached as Appendix 1. Appendices A, B and C to that document are included.</p> <p>The proposal to alter the status of the Thames Path to a combined footpath and cycle track was never implemented.</p> <p><u>Submission</u></p> <p>Figure 9.1 on Page 60 of the Plan shows the Thames Path as being part of the "Cycling Network of the Local Cycling and Walking Infrastructure Plan".</p> <p>That designation is incorrect because the legal status is a footpath and not a cycleway of cycleway/footpath.</p> <p>Cyclists persist with riding without a bell or any warning and go much too fast without consideration to walkers, many of whom are elderly, with or without dogs. It is only a matter of time before a walker or cyclist is severely injured or killed.</p> <p>The Council should amend the designation of the Thames Path in Figure 9.1 to make clear the legal status of the Thames Path.</p> <p><u>Conclusion</u></p> <p>Pang Valley Ramblers object to Figure 9.1 on Page 60 of the document "Partial Update of the Reading Borough Local Plan because it shows the incorrect status of the Thames Path within Reading.</p> <p>For the continuing use by cyclists of a path that does not comply with the minimum requirements of a combined Public Footpath/Cycleway leaves the Council vulnerable should there be an incident involving cyclists and pedestrians.</p>	<p>Noted. It is now proposed to remove the specific cycle routes from the Local Plan as there is a strong chance that these will be amended in the plan period. It is now considered that it is better that reference is simply made to the LCWIP or successor document, where matters such as this representation are best considered.</p>

	Attached with this representation is the Pang Valley Ramble Group representation to RBC in 2017 (Appendix 1), Photographs (Appendix A), Cycling in Reading Route map and facilities guide (Appendix B), and a photograph of a gateway (Appendix C).	
Tony Carr	<p>The Local Plan update suggests that the cycle route network plan proposed to be adopted is that from the Local Walking and Cycling Infrastructure Plan (LCWIP). However, this plan isn't necessarily up-to-date and doesn't show all possible future schemes. The cycle network plan needs to be flexible in order to allow new schemes to be introduced. This is the case where cycle schemes are necessary to serve future users/residents of a development site, or where a development site opens up opportunities for new or improved cycle routes that serve adjacent areas.</p> <p>I would therefore suggest that rather than having a fixed plan, the cycle network plan is reviewed and updated on a regular basis and agreed as part of future RBC Cycle Liaison Group or CAST meetings.</p> <p>Taking this approach should mean opportunities would not be missed, as has been done with Reading Green Park station. This is an obvious destination for cyclists, but no cycle route to the station was identified on any plan, so although there is a cycle route around the station car park, there is no safe cycle route through the surrounding development linking to cycle routes through Green Park.</p> <p>Also, a number of the possible future development sites are adjacent to existing or planned cycle routes, where development could potentially support new or improved schemes.</p>	Partly agreed. Change proposed. It is agreed that including the plan showing the cycle network within the Local Plan itself would be insufficiently flexible given that the network is likely to evolve over the plan period. Instead, there should be a cross-reference to the LCWIP and any successor document. The mechanism for reviewing that document is not a matter for the Local Plan.

Q. 47 Do you agree with the proposed updates to policy TR5 regarding electric vehicle charging?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	Batteries & chargers need standardisation.	No changes required. Although it is understood that electric vehicle batteries and chargers require industry standardisation, this is not a planning matter to be considered for the purposes of implementing this policy.
Henry Wright	N	Higher proportion of EV chargers should be demanded.	No changes proposed. The 20% figure already goes beyond Building Regulations requirements and demanding a higher proportion could result in viability issues.
Christian Harris	N	Electric vehicles are a current fad of the government while the motor industry is looking at hydrogen	No changes proposed. Notable changes in the availability and update of hydrogen powered cards are not anticipated in the short/mid-term future, so the focus is primarily on electric.
Reading Climate Action Network	Other	I think the 20% figure could be more ambitious. It is incumbent on the Council to work with infrastructure providers eg SSE etc to ensure that sufficient grid capacity is available. We should not be limiting the number of charging points because there may not be enough capacity in the network – the demand should be driving the development of the infrastructure.	No changes proposed. The 20% figure already goes beyond Building Regulations requirements and demanding a higher proportion could result in viability issues. Discussions with infrastructure providers are already in fruition to ensure sufficient grid capacity for new development, including EVCPs.
CADRA	Y	Yes. Being able to charge an EV from one's own domestic supply makes the fuel cost of EV much cheaper than a petrol or diesel vehicle. 45% of Reading residents have no off-street and will incur charging rates that are	Noted. Rates offered by operators are not within the scope of the Local Plan.

		significantly more than off-peak domestic rates. Whilst The Council's Electric Vehicle Charging Infrastructure Strategy 2023 describes trialling various ways for residents to connect to their own supply, this may not be possible for a significant number of residents. The policy should favour and encourage charging station applications for multiple chargers where the operators can offer near domestic rates for residents without off street parking.	
Sport England	Other	seems logical but what about increasing charging provision for electric cycle and scooter in schools, businesses, leisure/community centres and in the 'High Street'?	No changes proposed. E-scooters are not currently legal only on private land. It is considered that due to the range of e-bikes, public charging is not needed.
Reading Friends of the Earth	N	No. Policy should change but would like to see justification for requirement for non-residential developments be increased from 10% to 20% of off-road spaces because suspect this should be higher than 20% because of potential difficulties arranging on-street charging for Reading residents. Power supplies to locations should be adequate to cope with increased demand, fast charging, and peak loads. Maybe need for local battery storage to meet peak charging loads on electricity supply. Charging points should allow timed metering a) to prevent overload of charging supply b) to allow charging to reflect carbon implications of charging at different times. In addition the SPD on Parking Standards and Design should be re-assessed (or content included in TR5): to save useful space in crowded areas and discourage car ownership; and to provide adequate secure parking/storage space for bicycles, e-scooters etc.	The need for available infrastructure to support the move to electric vehicles for non-residential development has been identified within the EV Charging Infrastructure Strategy which forms the basis of the proposed increase from 10% to 20%. RBC are in liaison with utility providers regarding the supply of power for increased number of EVCPs that will be delivered over the plan period. However, it is not considered appropriate to set out detailed technical requirements for EVCPs that are too prescriptive at this stage. Updating the Parking Standards SPD is beyond the scope of the LPPU however car/cycle parking requirements will be dealt with at planning application stage and any proposals must be to the Council's satisfaction. E-scooters use is currently only legal on private land and are therefore their consideration is not deemed appropriate.
Stantec OBO St Edwards Homes	Other	In principle, we support the provision of electric vehicle charging points as part of development. We consider that policy should reflect requirements set out in Building Regulations. In this regard, we do not agree with the proposal in paragraph 9.26 to require 20% of spaces within dedicated car parks of 10 or more spaces for non-residential developments. We do not consider that adequate justification has been provided for the proposed requirement which is double that required by Building Regulations, or that it has been demonstrated to not adversely affect the viability of development.	No changes proposed. There is a clear need to ensure sufficient infrastructure is in place to support the continual growth of electric vehicles and to help address the climate emergency. Viability will be considered during policy formation.
Historic England	Y	We support the proposed changes	Answer is noted. No changes required.
Stantec (OBO UoR)	Other	The University supports the updates proposed to this policy to reflect that EV charging for residential developments is generally now covered by the Building Regulations (Approved Document S). It is also supportive of the expansion of the policy to include a presumption in favour of charging infrastructure. However, the University has some concerns regarding increasing the EV charging requirement for non-residential developments where there are at least 10 spaces from 10% to 20%. It is not considered that there is sufficient justification for a requirement that goes beyond current buildings regulations (Approved Document S). It could quickly become redundant given the advancement of technology in this area and could place a considerable strain on electricity supplies. The demand for 'at-work' charging facilities is likely to plateau as increasing numbers of	Comments are noted, however, no changes are proposed. The proposed increase for non-residential development is justified as it will help to meet the Council's net-zero goals. Further, it is considered appropriate based on EV ownership data (existing and projected). In addition, it will help to further tackle the air quality issues prevalent in Reading, resulting in health benefits.

		dedicated EV charging facilities come forward, as the speed of EV chargers increases and as more and more people have charging facilities at home The Statement given in the House of Commons (on 13th December 2023) sets out the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. It is considered that this principle could also be applied to the provision of EV charging points. The approach taken for EV charging for residential developments should also be applied to non-residential development - the policy should be silent as requirements are now covered by the Building Regulations (Approved Document S).	
Savills (OBO Sorbon Estates Ltd)	No answer	<p>It is agreed that the LPPU should remove requirements for Electric Vehicle (EV) charge points from the wording of Policy TR5 as these are set out in and required for all new homes under Building Regulations (Approved Document S). Therefore it is agreed they do not need to be repeated in the LPPU to avoid unnecessary duplication, in line with paragraph 16 of the NPPF.</p> <p>Any uplifts proposed for non-residential development, need to carefully consider electricity supply and whether there is, or will be capacity in the grid to support growing demands. It is a known and public issue that the local network operator, Scottish and Southern Electricity (SSEN) raised concerns in September 2023 and restricted connections for some developments in the borough. This was due to the increased electricity demand, meaning less sustainable energy sources (i.e. gas energy connections instead of Air Source Heat Pumps), were required to be implemented. Therefore, the viability of all sustainability uplifts requires careful consideration.</p>	Answer is noted. No changes proposed. RBC is working closely with the local network operator to ensure grid capacity is in place to account for planned growth and the shift to net zero.

Additional representations submitted via email regarding transport policies in general

Respondent name	Comments	RBC Officer Response
Earley Town Council	ETC has previously commented on RBC's transport strategy related to the Third Thames Crossing and repeats the comment here. ETC believes the Third Thames Crossing needs to have proper links to avoid traffic flowing through Earley roads. If the route is linked to the A329M, then Earley Town Council would prefer it to be direct rather than via a stretch of the London Road.	Answer is noted. No changes needed. This is a matter that will need to be considered in more detail as plans for cross-Thames travel evolve.
Aubrey Blazey	<p>You need to bite the bullet and annoy the car drivers and switch any double lane roads to bus/cycle lanes, and single lane for cars.</p> <p>Any new urban buildings should have 80% car parking dedicated to car share schemes like co-wheels.</p> <p>In order to fix much of what's wrong with Reading you need to fix the transport - and I say it every chance i get: why can you not purchase the old post storage next to the train station and turn it into a bus station, rather than having bus stops randomly across town? A simple circular route bus /hop on off for the town centre would solve 90% of the issues and the rest of the town could be pedestrianized.</p>	<p>No changes proposed. Changes to lanes are a highways/transport matter and beyond the scope of the LPPU.</p> <p>Development within the town centre will generally be limited on the amount of parking available, and therefore implementing dedicated car sharing schemes is not considered necessary. Furthermore, any proposed development will need a transport assessment submitted at the planning stages to ensure appropriate parking levels are provided to the Council's satisfaction.</p> <p>The former Royal Mail Sorting Office has gained planning permission for residential use. Bus</p>

		operations are a transport matter and beyond the scope of planning.
--	--	---

Chapter 10: Retail, leisure and culture

Q. 48 Do you agree that we should update the retail, leisure and culture policies listed? (RL2, RL3 and RL4)

Respondent name	Y/N/Other	Comments	RBC Officer Response
Paul Oliver James Melville	Y	less burger and fast food joints, betting shops, gaming zones and more physical sports areas for healthy living. Do we all want to become obese?	No changes proposed. Policy RL3 deals with the vitality and viability of smaller centres. Control over betting shops and gaming zones are dealt with under policy RL4. Retail and leisure provision is covered by Policy RL2 which will take into account the latest needs.
Savills (OBO Sorbon Estates Ltd)	Y	Yes. The listed retail policies should be updated to ensure the LPPU is up-to-date and consistent with the NPPF. These updates will need to take into account wider changes to the retail sector and updated assessment of retail needs to ensure the evidence is robust.	Answer is noted. No change required. Policy to be updated to take into account the most up to date information on retail needs.

Q. 49 Are you aware of anything else that should be factored into an update to policy RL2?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Henry Wright	N/A	Presumption in favour of approving any new leisure spaces or conversion from retail to leisure especially preferring this to conversion from retail to residential.	No changes proposed. The amount of leisure to be planned for will be based on the latest needs. Given there has recently been a trend towards a loss of retail floor space, rather than a gain, adopting this approach would not be appropriate, however, the needs assessment will confirm the current position. An Article 4 direction is in place to prevent the conversion of Class E facilities to residential without planning permission. The

			protection of leisure facilities is already dealt with under policy RL6.
CADRA	N/A	<p>It is notable that a common and significant response from North Reading residents to the proposals North of the station, was the loss of retail – particularly Aldi and The Range. The population of North Reading represents about a fifth of the Borough. The previous and prospective loss of convenient, good value retail is a growing concern. Increasingly, such retail is at an increasing distance and extremely difficult to access by public transport. This increases cross town car journeys which is damaging to the environment. This should be considered in determining the location of retail areas.</p> <p>The policy considers core areas of employment. CADRA would like the policy to consider other areas where employment could help reduce the need to travel to core areas. This needs to be carefully balanced with the need to ensure residential areas remain pleasant and safe places to live.</p> <p>The riverbanks are an important feature of the town to be enjoyed by all. The banks of the Thames should not be unduly dominated by residential and should provide leisure and other uses for wide enjoyment which might include retail.</p> <p>Leisure facilities need to be spread across the town to allow good access without recourse to private car journeys.</p>	<p>Answer is noted. However, no changes are proposed. None of the proposed allocations within the LPPU would result in the loss of retail North of the station. Any new retail facilities must comply with Local Plan policies relating to climate change adaption and sustainability.</p> <p>Location of employment development is dealt with under policy EM2. Biodiversity and the Green Network, including the protection of such sites is set out within Policy EN12.</p> <p>RBC has commissioned the work to be carried out to understand the latest leisure, culture and retail needs. The existing policy confirms that such uses should be located within or adjacent to the town centre given this area is widely accessible to Reading's residents and helps to avoid residential domination. A sequential approach should be adopted in identifying alternative sites beyond the town centre.</p>
Damians Bramanis	N/A	I believe that retail, leisure and culture are dissimilar, and so shouldn't be all considered as one. While retail needs may be decreasing, as retail shifts online, there is a strong need for more leisure and culture as they directly benefit the community.	Answer is noted, however, no changes proposed. The retail study to be commissioned will consider the latest trends in retail, leisure, and culture. The proposed scale and location of such will therefore be set out accordingly, taking into account any increased need for leisure/cultural development.
Opus Works (OBO AEW Core Plus Property Fund)	N/A	The client welcomes the recognition given in the LPU paragraphs 10.4 and 10.5 regarding changing shopping and leisure patterns post-pandemic and agrees with the proposal that the policy be updated to refer to updated needs for retail, leisure and culture uses, taking account of the most up-to-date information. The changes to Policy RL2 are supported.	Answer is noted. No changes required.
Turley (OBO Oracle Limited Partnership)	N/A	Given the structural changes in the retail and town centre sector over recent years and the evolving nature of town centres, this requirement is clearly not representative of current occupier and consumer demand for retail space. To ensure any updated policy is reflective of current market conditions, OLP consider there is a need for updated assessments to inform an update to Policy RL2 on the quantitative and qualitative requirement for additional town centre floorspace. It should be ensured that any parties undertaking such assessments on behalf of RBC engage appropriately with key stakeholders in Reading Town Centre, such as OLP, and that any documents are published for comment and/or scrutiny at appropriate milestones. This will ensure that any additional assessment used to inform policy and evidence-base, be sufficiently tested by stakeholders.	No changes proposed. A Commercial Development Needs Assessment accompanies the Local Plan and contains evidence to support the figures in the revised policy. It has been informed by key stakeholders.

Savills (OBO John Lewis Partnership)	N/A	<p>The proposed approach to update Policy RL2 based on an up-to-date assessment of retail, leisure and culture uses is supported. The outputs of an up-to-date assessment should inform the overall approach taken within the LPPU to retail, leisure and culture uses and to the designation of the Primary Shopping Area and Primary Frontage areas.</p> <p>It will also be important to ensure that the LPPU is sufficiently flexible to address key issues and to respond to changing circumstances during the Plan period to 2041.</p>	It is unclear in what way flexibility is being requested within the LPPU. The Commercial Development Needs Assessment considers in detail changing circumstances and trends etc. to address key issues and will be subject to review in 5 years time.
Savills (OBO Sorbon Estates Ltd)	N/A	<p>It is noted that LPPU seeks to update policy RL2 and reassess its retail requirements for the new plan period. It is agreed this is necessary as shopping and leisure patterns have likely changed since the COVID-19 pandemic.</p> <p>It should be noted that Site SOU1 – Reading Link Retail Park, whilst currently in retail use is neither allocated nor being promoted for these purposes. The buildings are old and the use is no longer making efficient use of the land. The Site is out of the town centre, where sequentially, retail uses would generally be avoided. Therefore, the retail strategy should continue to focus on allocated retail uses in the town centre and not prejudice the redevelopment of out-of-centre sites. This would be consistent with Paragraph 126 of the NPPF, which requires policies to reflect changes in the demand for land. In addition 127 of the NPPF identifies that a positive approach should be taken for proposed alternative uses of land which are currently developed, but not allocated for a specific purpose in the plan. See also Paragraph 127 b).</p> <p>It is considered that given the clear and identified need for more housing in Reading and the location of Reading Link outside the town centre which is not allocated for this purpose, would present a significant opportunity to deliver the proposed alternative residential use, in accordance with the NPPF policy criterion above.</p>	Noted. No change needed. A significant need for retail floorspace has not been identified. The Reading Link Retail Park site is included as a residential allocation.

Q. 50 Do you agree that we should update policy RL3 as described to reflect permitted development rights?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
CAAC	Other	Agree but in addition extension of policy to cover some of the frontage in the stretch of Oxford Road beyond the IDR to Bedford Road should be considered. See also Q55 below.	No change proposed. This is very much a secondary retail street, and the focus needs to be on the core elements of the centre, particularly in the context of a more challenging environment for retail.

Q. 51 Do you agree that we should update policy RL4 as proposed to address other gambling establishments?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
James Ford	Other	Need regulation & oversight.	No change needed. It is noted that the regulation of gambling establishments it outside the remit of planning policy. However, the proposed updates to RL4 do include greater restrictions on the ability for gambling establishments to cluster.
Paul Oliver James Melville	Y	less gaming joints.	No changes required.

M Langshaw	Other	Yes, although better still to reduce further the concentration of gambling establishments, to say two rather than three maximum within 150m. They neither enhance Reading in any way, nor do they improve citizens' lives, particularly in a time when the cost of living is putting many people under extreme financial pressure.	Although comments are acknowledged, it is noted that a limited number of premises do not necessarily cause issues on their own and can contribute to the range of facilities in a centre. Therefore, it is not necessary to place further restrictions on the number of establishments present, but rather expand the types of facilities that are governed by the policy.
------------	-------	--	--

Chapter 11: Other uses

Q. 52 Do you agree that we should update the policies for other uses listed? (OU2 and OU3)

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Y	Need to allow 5G coverage on the borough. Maybe the borough should own the masts & allow the telecommunications companies to use them for a fee thus minimising the numbers needed & allowing changes when the borough sees fit.	No changes proposed. Updates to policy OU3 will ensure consistency with national policy and legislation on telecommunications infrastructure to enable its implementation, however, the Council have no control over the roll-out of 5G as this is delivered via infrastructure providers. This, and the ownership of masts, is fundamentally beyond the scope of planning.
CADRA	N	OU4: Advertisements should be updated to consider the growing number of applications for digital advertising. OU5: Shopfronts and cash machines. The important Design Guide to shopfronts must be safeguarded.	It is not considered that policy OU4 requires an update, as the general principles within it should still be robust to deal with digital advertisements. The Shopfront Design Guide SPD was adopted in January 2022. SPDs will continue to exist for as long as the five year period of the plan. As such, the Design Guide will continue to function as an SPD.
CAAC	Other	Agree in part In addition OU1 should be updated to strengthen the wording in relation to playing pitches policy. See Q16 above.	Please see response to Q16.
NHS Property Services		Adopted Policy OU1 New and Existing Community Facilities seeks to protect existing community facilities in restricting redevelopment on such facilities for non-community uses unless there is clear demonstration that there is no longer a need to retain the facility. NHSPS supports the provision of sufficient, quality community facilities, but objects to specific wording within this policy in relation to the loss of existing community facility uses. In agreement with Question 52, we are of the view that a partial update is also required for Policy OU1 to ensure flexibility is granted for community facilities, where health is included in this definition, through the requested policy wording amendments. This is being recommended to support the principle that where the NHS can demonstrate a health facility will be changed as part of NHS estate reorganisation programmes, this will be sufficient for the local planning authority to accept that a facility is neither	No change proposed. In these circumstances, the NHS should be able to demonstrate that the facility is either surplus to requirements or that better provision can be provided elsewhere. We would expect that any estate strategies or programmes could be pointed towards as part of this argument.

		<p>needed nor viable for its current use, and therefore that the principle of alternative uses for NHS land and property will be fully supported.</p> <p>In order to enable the NHS to be able to promptly adapt its estate to changing healthcare requirements, it is essential that all planning policies enable flexibility within the NHS estate. On this basis, NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can potentially have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed, which in turn delays vital re-investment in the NHS estate.</p> <p>The NPPF is clear in stating that Local Plans should adopt policies that “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community” (Paragraph 93b).</p> <p>It is important that policies consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services.</p> <p>Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use.</p> <p>With this in mind, we are keen to encourage that flexibility be granted to the NHS via the wording of any planning policy and therefore request for Policy OU1 to be included in the Local Plan's partial update. This will ensure that the NHS can promptly and efficiently respond to the healthcare requirements of residents through the evolution of its estate.</p> <p>Amended wording For reasons outlined above, we recommend that the wording of Policy OUS1 are amended as follows (underlined in red) <i>“Proposals involving the redevelopment of existing community facilities for non-community uses will not be permitted, unless it can be clearly demonstrated that there is no longer a need to retain that facility, or the loss of change of use of an existing built community facility is part of a wider public service estate reorganisation.”</i></p> <p>This change would directly address the issues outline above; and would ensure that the NHS is able to effectively manage its estate, disposing of unneeded and unsuitable properties where necessary, to enable healthcare needs to be met.</p>	
Stantec OBO SEGRO	Y	<p>SEGRO agree that the policies listed for 'Other Uses' at paragraph 11.1 should be updated. This is especially applicable to Policy OU2 (Hazardous Installations), given the extension of the Detailed Emergency Planning Zone (DEPZ) for the Atomic Weapons Establishment (AWE) Burghfield.</p>	<p>Answer is noted. No changes required.</p>

Q. 53 Do you agree with the changes proposed to reflect the extension of the DEPZ for AWE Burghfield? Are there other changes that are required?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Adam Boulding	Y	RBC need to listen to external experts more. when HS&E tell you not to grant a planning permission you should agree, when the atomic regulator tells you not to approve a traveller site in the DEPZ you should agree with them and not grand that planning. Reading councillors opinions do not outweigh national experts in science, safety or health... there is nothing shameful in listening to experts to advise on best actions - planning advisors are not and do not outweigh experts in health and safety	Answer is noted. No changes needed.
Stantec OBO St Edwards Homes	No answer	<p>Paragraph 11.7 outlines that much of the DEPZ within Reading falls outside the 3km buffer of AWE Burghfield which was the starting point for defining the zone and was only included when this was mapped to features on the ground to avoid splitting communities. This, and the consequent need to weigh the DEPZ against other factors should be reflected in the supporting text for Policy OU2.</p> <p>Paragraph 11.5 proposes an additional clause to Policy OU2 which deals specifically with development in the DEPZ for AWE Burghfield, which makes it clear that proposals will be judged in terms of their impact on the AWE Burghfield Off-Site Emergency Plan and that increases in population within the DEPZ will not be acceptable unless they can be accommodated within that Plan. We understand the principle behind this proposed addition, however the proposed wording would place reliance on a specific emergency plan, which may or may not be superseded by an alternative in the future.</p> <p>In addition, development sites will be able to demonstrate that any risks they generate are mitigated through other measures including sufficient alerting and shelter arrangements which will alleviate the potential impact on the authorities responding to the off-site consequences of an incident at AWE Burghfield.</p> <p>In this regard, by focusing only on the Off-Site Emergency Plan rather than also allowing for alternative routes to demonstrating safety, the proposed policy wording will potentially inhibit development which could otherwise be safely occupied. The benefits which could be delivered by development, including much needed homes, could be needlessly foregone as a result.</p> <p>We therefore recommend that the policy is worded so as to allow for such circumstances by requiring that increases in population within the DEPZ will not be acceptable unless appropriate emergency plans are in place. The policy could also require pre-application engagement with Emergency Planners to ensure that safety measures are appropriately considered.</p> <p>St Edward are working with Emergency Plan specialists to ensure that development at land at Green Park Village (Sou4) could be supported by appropriate safety measures. This will ensure that measures are in place to secure the safety of residents of the site, without adversely affecting the safety of residents of other areas of the DEPZ.</p>	<p>No change proposed.</p> <p>Whatever way the DEPZ was originally defined, the fact remains that its boundaries now include those parts of Reading identified.</p> <p>Should an incident take place at AWE Burghfield, this will require a comprehensive emergency response across the area rather than individual responses not aligned to the agreed emergency plan. It is agreed that the Off-Site Emergency Plan may be reviewed in the future, and the policy should therefore refer to any successor document.</p>
Stantec OBO SEGRO	N	<p>With regards to the inclusion of an additional clause to the policy which deals specifically with development in the DEPZ, it is considered that recognition needs to be given to existing allocations as identified in the adopted Local Plan and any LPPU. This is particularly relevant given the extension to the DEPZ occurred after the allocation of Policy SR1 in the adopted Local Plan.</p> <p>It is noted within the Scope and Content (Regulation 18) consultation that increases in population within the DEPZ will not be acceptable unless they can be accommodated within that Plan. However, no reference to zones, the definition of 'populations', or allocations and their ability to meet need, is set out within the proposed changes to</p>	<p>Noted.</p> <p>The existing allocations within the DEPZ are to be carried forward, albeit with reference within the relevant policy criteria relating to the DEPZ.</p>

	<p>the policy. As such, SEGRO request that clarification is provided in the policy confirming the definition of 'increases in population' and what types of development will be permitted within the DEPZ. It appears to relate to the Outer Zone above, but we request this is explained.</p> <p>SEGRO support the recognition by RBC that the development of relevant allocations within the DEPZ will need to be considered further. This is particularly relevant to the Site given it is allocated for employment purposes in the adopted Local Plan and this allocation was confirmed prior to the extension of the DEPZ zone.</p> <p>SEGRO agree that the DEPZ boundary zone will need to be weighed against other factors such as the allocation of the Site in an adopted Local Plan and the Council's expectation it will be developed to deliver significant investment, jobs, rates etc for the Borough. It is considered that the delivery of the Site and its ability to meet substantial employment need is a significant factor weighing in favour of its redevelopment when a planning application is submitted.</p> <p>Overall, SEGRO do not agree with the proposed changes to Policy OU2. Given the Site is an existing Local Plan allocation for redevelopment, it is considered clarification as to what development will be permitted within the DEPZ should be included within the policy. SEGRO request that additional wording is included within the policy acknowledging that if existing allocations are in accordance with the necessary requirements of the DEPZ, then planning permission should be granted accordingly.</p> <p>SEGRO would welcome a meeting with the Council to discuss the DEPZ extension in further detail, and will be in contact in this regard.</p>	<p>The DEPZ does not have an outer zone, it is a single zone which is shown on the Proposals Map.</p> <p>The supporting text clarifies that increases in population includes working and visiting population, who may be present in the event of an emergency.</p>
--	--	--

Additional representations submitted via email regarding the DEPZ extension

Respondent name	Comments	RBC Officer Response
AWE & MOD	<p>REPIR 2019 requires the preparation of hazard evaluations and consequence assessments to identify potential radiation emergencies, and which inform West Berkshire District Council's (WBDC's) determination of the DEPZ and its Off Site Emergency Plan (OSEP).</p> <p>The DEPZ was set by WBDC on 12 March 2020 and subsequently refined in January 2023 . As rightly identified in paragraph 11.3 onwards of the Regulation 18 Plan (and shown in figure 11.1), as a result of REPIR 2019 there is a significant extension to the DEPZ (from a radius of 1600m to 3160m), which means that its geographic area and extent has increased in all surrounding areas including Reading. Accordingly, more of Reading Borough is now located within the DEPZ and future local plan polices need to be adjusted accordingly to ensure the proper planning of the area.</p> <p>Informed by recent test exercises, the Emergency Planning Team at WBDC and the ONR are very concerned about the pressure that the OSEP is under with the level of development and activity in the area. They consider that there is a significant risk that it cannot accommodate additional housing and other development within the DEPZ. AWE/MOD, the ONR and the Emergency Planning Team have therefore objected to recent development proposals on the basis that there is a substantial risk that the OSEP cannot accommodate consented and future housing and other development. Such uncertainty requires a precautionary approach and a corresponding substantial margin of safety.</p> <p>Paragraph 101 of the NPPF (NPPF) requires appropriate and proportionate steps to be taken to reduce vulnerability and ensure public safety. In this case, whilst the likelihood of a radiation emergency at AWE B is very low, the potential impact on the local population would be high and an appropriate and proportionate step is, where possible, to avoid new development that increases the population being put at risk within the DEPZ.</p>	<p>Noted.</p> <p>The policy is updated to reflect the general comments regarding the DEPZ. It is worth noting that no new allocations are proposed in the DEPZ.</p> <p>It is not agreed that a wholly new policy is required. Inclusion within an existing policy does not result in the policy contents having any less weight.</p> <ol style="list-style-type: none"> 1. It is agreed that the policy should anticipate any future changes to the DEPZ, and this is reflected in the wording. 2. Existing employment allocations within the DEPZ are carried over. These allocations pre-date the extension of the DEPZ and development of the Off-

<p>It is notable that the risks not only apply to any new population but also to existing populations, where the burden of managing existing residents and workers would come under more pressure if new housing and development increased populations and complexity. The Appendix to this letter shows how most recent appeals, even for single dwellings, have been dismissed. AWE/MOD consider that additional residential and other population generating development within the DEPZ poses a significant potential threat to the nation's security by constraining both the current and future operation of AWE B.</p> <p>The importance and weight to be applied to national security is reinforced following the introduction of NPPF 2018 paragraph 95 (b) which has been carried forward into the current NPPF 2023 at paragraph 101 (b).</p> <p>AWE/MOD are concerned that cumulatively housing and other forms of development could:</p> <ul style="list-style-type: none"> • Restrict operations in certain facilities due to potential conflicts with radioactive and nuclear legal and regulatory requirements; • Require the implementation of additional engineered safeguards to facilities and/or possible relocation of facilities with consequential disruption, delay and additional cost to the defence of the UK and public finances; • Constrain the ability to manage any future changes in health and safety legislation; and • Set a precedent for future planning and development applications and approvals in the emergency planning and risk areas near to AWE B, leading to further erosion of its utility and increasing potential adverse impacts upon the UK's nuclear deterrent. <p>Given the importance of the precautionary approach, these risks could undermine national security and international (NATO) defence commitments. Even where risks are small to the future operation of AWE B, given the unique and vitally important strategic defence function, there must be a presumption against new housing development within the DEPZ.</p> <p>1. Representations (Q53: Do you agree with the changes proposed to reflect the extension of the DEPZ for AWE Burghfield? Are there other changes that are required?)</p> <p>In principle, AWE/MOD support the proposed updating of the Local Plan in respect of the DEPZ. However, recent experience of planning in the DEPZ means that it is now essential that the policy is re-written rather than just adding a clause testing proposals against the ability of the development to be accommodated in the OSEP. This is essential for the proper planning of the area, to provide clarity and certainty and to reflect the extension of the DEPZ described above. New policy must provide for necessary proportionate steps to reduce vulnerability in the DEPZ and ensure public safety in accordance with the NPPF, whilst ensuring the continuity and resilience of AWE and its important national and international significance.</p> <p>The Local Plan should include the following in respect of the AWE B DEPZ:</p> <ol style="list-style-type: none"> 1. Revised policies must ensure that they allow for any future changes to the DEPZ which could alter during the lifetime of the Local Plan, e.g. due to changes in legislation or policy. This will ensure that the Local Plan remains up to date and provides a robust basis for considering future application proposals. Reference to the DEPZ on the Proposals Map should make it clear that the zone can change and reference to the zone in the policy should ideally link to West Berkshire District Council's website where the latest version of the DEPZ will be accessible. 2. Consistent with the requirements in national policy, the revised Local Plan should not allocate land (nor carry over existing allocations) for housing or other uses which increases the population within the DEPZ (including significant employment development or the enlargement of the Madejeski Stadium for example). The proposal to remove the proposed allocation Sou4 is justified. AWE would welcome a discussion with RBC in order to understand the planning status, in terms of extant permissions, for the existing allocation SR1. 	<p>Site Emergency Plan, and should be covered within it. These are the only significant opportunities to meet the extensive employment needs of Reading, and recent proposed changes to the NPPF highlight the nationally important nature of logistics in particular. Employment developments are better able to be accommodated within the emergency plan due to the ability to more coherently manage the people within the developments. There are no existing or new residential allocations in the DEPZ.</p> <ol style="list-style-type: none"> 3. A criterion relating to not prejudicing the security and future of AWE B is included in the policy. 4. Information on where consultation will be required is in the supporting text, which is a more appropriate location than within the policy itself. 5. This is generally reflected within the draft policy, but it is not considered appropriate that decisions on planning applications are delegated to parties other than the local planning authority (or alternative decision maker such as the Secretary of State).
--	--

	<p>3. New policies should include a criteria which prevents any development which would prejudice the security and future of AWE B's role and resilience in delivering the warhead contribution to the national and international UK nuclear deterrent.</p> <p>4. In light of the above, the policy should include a requirement to consult the ONR, the Emergency Planning Team and AWE/MOD on any development proposals which increase the population or activity within the DEPZ.</p> <p>5. As suggested in paragraph 11.5, new policy should make it clear that proposals will be considered and evaluated in terms of their potential impact on the AWE B OSEP and that increases in population within the DEPZ will not be acceptable unless they can, in the opinion of parties listed (in 4 above), be accommodated within the OSEP.</p>	
--	---	--

Q. 54 Do you agree with the changes proposed to policy OU3?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	5G is needed.	See officer response to Q. 52.
Reading Friends of the Earth	Other	Not sure. With emergence of 5G and 5.5G a shift to higher frequencies is likely. This is likely to lead to demand for many more masts with directional antennae because of shorter range and directionality of higher frequency signals. More controls may be needed. All developments should ensure that it will be easy to make changes to wired and fibre connections in future as technology changes without having to employ disruptive and expensive digging, drilling, etc.	Answer noted. 5G deployment is ongoing and OU3 seeks to introduce such controls to limit impacts on amenity. It is unclear what is meant by "all developments should ensure that it will be easy to make changes" or how this would be assessed by planning officers within the Council. It is not within the scope of the Local Plan. Cr2
Historic England	Y	We support the proposed changes, subject to the detail	Answer is noted. No changes required.

Chapter 12: Area-specific policies and site allocations

Q. 55 Do you agree that we should update the area-specific and site allocation policies listed? (CR2, CR5, CR6, CR7, CR11, CR12, CR13, CR14, CR15, SR1, SR4, SR5, WR3, CA1, ER1, ER2, and ER3)

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Friends of Reading Abbey	Y	See specific comments on CR13a and CR15 below, which should be read together.	See officer response to respective comments
Thames Water	No Answer	<p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.</p>	Noted. No change needed.
CAAC	Other	<p>Agree in part, in addition the portion of Oxford Road beyond the IDR to Bedford Road should be considered. This policy does not provide any protection to the range of uses to parts of Oxford Road (within the Russell Street/Castle Hill/Oxford Road CA) which are within the Central Reading boundary but not primary frontage. This anomalous situation should be addressed either by inclusion within policy CR7 or being covered by policy RL3, Vitality and Viability of Smaller Centres. The current situation does not control the total number of units or adjacent to one another in takeaway use. See Q50 above.</p>	No change proposed. This is very much a secondary retail street, and the focus needs to be on the core elements of the centre, particularly in the context of a more challenging environment for retail.
Savills (OBO BOC)	No Answer	See response to Q.5 regarding policy SR3	See respective officer response to comment at Q.5

Historic England	Y	We support updating the policies as proposed.	Answer is noted. No changes required.
Savills OBO Viridis	Y	<p>Yes: these policies should be updated to ensure the LPPU is up-to-date, particularly in the context of delivering its housing requirements.</p> <p>However the LPPU should also include a review of Policy CR10 to ensure it reflects the amended emphasis in the NPPF on delivering new development at higher densities and to ensure consistency across other policies e.g. Policy H2 which relates to housing density. In particular, CR10 needs to be reviewed as it currently limits the ability of the borough to meet its future housing needs by acting as a barrier to achieving higher densities outside the designed areas for tall buildings. With limited brownfield land available within the urban area of Reading, opportunities must be taken to optimise the contribution that all previously developed sites make and to achieve this a comprehensive review of the current, dated, tall buildings policy is essential. The review should see tall buildings as an opportunity rather than a threat, with positive encouragement given for well-designed tall buildings that respond positively to their surroundings. It is notable that the current Tall Buildings Policy is informed by the Tall Buildings Strategy which was published in 2008, some 16 years ago. This Strategy should also be updated to reflect the significant changes that have taken place in the Borough in this time and to be based on up to date evidence.</p>	Noted. Changes are now proposed to policy CR10, albeit these continue to be based on the Tall Buildings Strategy which remains a relevant piece of evidence.
Savills (OBO John Lewis Partnership)	No answer	<p>The intention to update area-specific and site allocation policies is supported, particularly the intention to update Policy CR14 (Other sites for development in Central Reading), as explained further below. However, in addition to the policies listed, we would also request that Policy CR10 (Tall Buildings) is reviewed as part of the LPPU.</p> <p>See NPPF (December 2023) Paragraphs 62 and 129</p> <p>Given increasing housing needs within the borough, and the Council's own objectives to strengthen the role of Reading and ensure as many new homes as possible are delivered (LPPU objectives 1 and 2), it is clear that a positive and more flexible approach is required towards the scale and height of new buildings in the borough.</p> <p>It is notable that the Council's current tall buildings policy (CR10) is informed by the Tall Buildings Strategy (2008), which was published 16 years ago. Accordingly, given the significant subsequent changes in the borough and increasing local housing needs, it is recommended that an updated Tall Buildings Strategy is prepared and that Policy CR10 is updated accordingly based on up-to-date evidence and wider aspirations and needs.</p>	Noted. Changes are now proposed to policy CR10, albeit these continue to be based on the Tall Buildings Strategy which remains a relevant piece of evidence.

Additional representations submitted via email regarding the site allocation policies listed

Respondent name	Comments	RBC Officer Response
Earley Town Council	ETC notes that there are very few areas identified for development that border the area of Earley Town. This obviously reflects the already high density of mature urban development and limited opportunities for development.	Answer is noted. No changes response.
National Highways	<p>We do not have any specific comments to raise regarding any of these potential development sites. We would be concerned if any material increase in traffic were to occur on the SRN or at its junctions because of planned growth within the borough, without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure being in place.</p> <p>When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.</p>	<p>Answer is noted. No changes needed.</p> <p>The Transport modelling work assesses the impact of planned growth on the strategic road networks or at its junctions and will set out relevant mitigation measures.</p>

<p>Turley (OBO Oracle Limited Partnership)</p>	<p>It is noted that the Oracle is not currently identified as such a location, despite there being clear market and developer interest in this location, as exemplified through the submission of two live planning applications. OLP have engaged extensively with Council Executive Officers, Planning Officers, Elected Members and the community for over 2 years regarding the diversification of the shopping centre offer, to create a high quality residential community in the heart of the town centre. The Oracle area provides significant potential to accommodate a range of uses, including residential, through densification of development and repurposing of commercial floorspace, whilst retaining its primary function as a destination space in the southeast region. It is therefore requested that the Oracle area (identified at Appendix 1) is also recognised as a key opportunity site within the LPPU that can suitably and demonstrably accommodate sustainable development, including residential uses.</p> <p>Should further information be required as to the capability and capacity of the Oracle opportunity area we would be happy to provide, but would refer Officers to the information provided through planning applications ref. 221916 and 221917 as a starting point.</p>	<p>The Oracle is now included as a proposed allocation for development (CR14g).</p>
<p>Environment Agency</p>	<p>Please refer to our comments in the attached spreadsheet – ‘Environment Agency comments on the Allocated sites’ and a summary of our comments concerning some environmental matters below.</p> <p>Flood risk The sequential test is only referenced for one allocated site but all sites in Flood Zones 2 or 3 should pass the sequential test so further detail is required including justification relating to why the allocate sites are appropriate for development. Similarly, the document should discuss the exception test for each of the sites where relevant as directed in national policy.</p> <p>Please note that according to NPPF 2023, paragraphs 170 and 171; 170 The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. 171. Both elements of the exception test should be satisfied for development to be allocated or permitted.</p> <p>Some of the allocated sites are located in higher risk flood zones and we find there is no reference in the plan about updating the Strategic Flood Risk Assessment (SFRA) to reflect the evidence supporting the allocated sites and how the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.</p> <p>An update to the SFRA is required and must reflect update to climate change allowances and national policy and guidance - Flood risk and coastal change section of the PPG. We recommend the latest climate change allowances are used to consider if developments will be safe for their lifetime. The Environment Agency latest modelling (Kennet - Tyle Mill to Thames Confluence 2018 and Thames - Pangbourne to Sonning 2019) does not have the exact climate change allowances modelled so our assessment of the impact of climate change is slightly conservative.</p> <p>We recommend reviewing the Flood Risk Management Plan and River Basin Management Plan measures for Reading because the plans set out the current state of the water environment, setting objectives that are crucial for sustainable growth and effective regulation.</p> <p>Ground water and contaminated land Please note that we have identified that many of these proposed sites have had site investigations done in the past. In these cases, we stated, ‘This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use. We would endorse that sites are fully investigated following LCRM guidelines</p>	<p>Change proposed to ensure Policy EN18 and the supporting contain the suggested information.</p> <p>The SFRA reflects updates to climate change allowances and national policy and guidance.</p>

	<p>For those sites where we do not hold records of site investigations, desk studies would be expected as a minimum requirement which we would endorse when we are consulted at the planning application stage. Further investigations and remediation may also be required. We note that for some sites in Appendix 2, this aspect has been briefly noted. For example, for site 8 Kennet Place, Kings Road: Issues and constraints: Site subject to potential contamination. At this site for example, we do hold a record of prior site investigation therefore we support this inclusion.</p> <p>Waste water drainage We have been unable to provide detailed comments for you on the allocated sites about wastewater drainage because there are water drainage concerns that must be addressed before further sites are considered and allocated for development in Reading. Please refer to the evidence as provided in section 2.2.</p>	
--	---	--

Q. 56 Do you agree that we should update policy CR2 as described? Are there other changes that are required?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Henry Wright	Y	More emphasis on establishing a physically green link between the town centre and the river should be added. Any development (including of proposed sites) which helps meet this aim - e.g. via provision of wide tree lined pedestrian avenue to river, or relocating the substation should be seen as desired	Answer noted. No change proposed. This policy aims to provide overarching design guidance for the central area, not for particular sites. The preference for green links between the town centre and the river is noted in specific site allocations and reiterated in CR3: Public realm in Central Reading.
Christian Harris	N	No comments	Answer is noted.
CADRA	No answer	We suggest that reference should be made to the exceptional historical details which remain on the upper storeys through much of the town centre.	Answer noted. No change proposed. It is considered that inclusion of this reference is too detailed and that the historic elements of upper storeys within the town centre is best addressed by policies CC7, EN1, EN3, EN4 and EN6.
CAAC	Other	<p>Agree in part but disagree with re-establishment of the 'original grid' on practical and design grounds. The original grid must be defined for this to be a policy that can be complied with otherwise it is impractical. Aside from archaeological evidence, the first evidence we have of Reading's original grid is Speed's map of Reading from 1610. The street layout of Reading today, as we know is more or less recognisable in that map. That is a good thing to know but it should not be a blueprint for the future.</p> <p>The centre of Reading has adapted to change since that time in particular the arrival of the Great Western Railway. If it were not for the Great Western Railway Reading would not have Queen Victoria Street and it would not be desirable for the design of central Reading for this street to disappear.</p> <p>The first bullet of the policy should delete the reference to grid and say 'Development of the central area will provide continuity and enclosure...'. Where appropriate we may find it makes sense in development and design terms to open up the Pig Market, re-instate some of the courts along Broad Street and Friar Street but there are also many new urban design ideas that could improve Central Reading today without looking back to the seventeenth century or earlier.</p> <p>The link to the Reading City Centre Framework in the Local Plan is out of date. The Framework itself is now very old and must be regarded as superseded by the developments currently happening at Station Hill and coming soon with the Minster Quarter.</p> <p>As an organisation we would like to see the heritage of the centre of Reading better conserved and enhanced by inclusion within a new town centre conservation area or extension of the existing St Mary's Butts/Castle Street and</p>	<p>Noted. Proposed language has been amended to omit "original." Continuity and enclosure are addressed by CC7: Design and the Public Realm.</p> <p>Although the City Centre Framework was published in 2002, it is still considered to contain some relevant information and therefore the reference remains.</p> <p>Heritage concerns are best addressed by heritage policies within the Local Plan.</p>

		Market Place/London Street CAs. Return to an 'original' grid or retention of the 'existing grid' does not meet that requirement.	
MRPP (OBO Samuel Smith Old Brewery)		In response to Q56, it will also be necessary for any changes to Policy CR2 'Design in Central Reading' to take into account the likely conflicting priorities associated with developing sites within the town centre. Thus, in developing sites for housing there will be instances whereby optimising sites to ensure housing numbers can be achieved will need to take priority over other design considerations.	Noted. This will be assessed on a case-by-case basis to ensure a balance is struck with housing delivery.
Historic England	Other	The proposed approach looks reasonable, subject to seeing the detail. I will be interested to see how a revised Local Plan, including policy CR2, might make best use of the recent High Street Heritage Action Zone Historic Area Assessment for central Reading. Also, I would welcome the opportunity to learn more about the Council's approach to its evidence more broadly, including updating dated conservation area appraisals (especially if the area is likely to undergo significant change).	Noted. Conservation Area Appraisals are undergoing updates on a rolling basis. The High Street HAZ assessment is available on the Council's website and is a useful resource for applicants.
TVCC	Y	We agree.	Answer is noted.
The Woodland Trust	Y	Support updating to add reference to designing for biodiversity net gain and to reflect the National Model Design Code including its encouragement of tree-lined streets.	Changes proposed, although this is primarily covered by CC7: Design and the Public Realm.
M Langshaw	Other	Definitely yes, a Reading Design Code should be facilitated. But is it also possible to discourage, or even ban, the painting of building surfaces not initially painted (ie brickwork, stonework, flintwork)? Painting such surfaces is not environmentally friendly (it is an unnecessary use of materials and energy), and can become shabby if not updated from time to time (whereas leaving the original material requires no maintenance), and it also destroys much of Reading's fabulous heritage, including much wonderful brickwork, but also handsome stone buildings, and historic flintwork.	Noted. This is addressed by heritage policies within the Local Plan, as well as CC7: Design and the Public Realm. Each application will be considered on a case-by-case basis, although where no planning application is required for exterior painting it is not within the control of RBC.

Q. 57 Do you have any comments on whether and how policy CR5 should be updated?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Paul Oliver James Melville	N/A	North of the river there are few amenities. No sports or recreational facilities for the young. Poor bus facility on the Peppard road after 9pm. only 1 restaurant in Emmer green which is appalling allowing more car use to travel to town.	No changes proposed. This policy relates to drinking establishments in Central Reading only.
Jean H Rainey	N/A	I agree that it should be updated as per the consultation document.	Answer is noted. No changes proposed.
M Langshaw	N/A	For Reading to remain a pleasant environment by night as well as by day, the number of licences should not be increased, nor the hours of existing ones extended. New ones could be granted to replace existing premises that close.	Answer is noted. The Local Plan is not relevant to the granting of premises licences.

Q. 58 Do you agree that we should update policy CR6 to seek a greater contribution towards family housing?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Henry Wright	Y	Add a presumption that developers of new development MUST meet any noise requirements, rather than a reduction of hours or change of use or noise order on existing cultural premises. This is to protect premises from litigious claims such as in Manchester where cultural venues are forced to shut by new residents who move into nearby property knowing of the existence of the venue.	No changes needed. Paragraph ii of policy CR6 relates to noise and sets out that new residential development should not be located next to existing town centre uses where these uses would give rise to unacceptable levels of noise and disturbance.
Christian Harris	Y	Please build houses with garden	No change needed. Due to the urban nature of the borough, high-density development (such as

			flats, with communal open space), in addition to family-sized housing is often required to suit the needs of the residents, as well as to meet housing targets. Adopted Policy H10 sets out requirements for private and communal outdoor space for dwellings. Nevertheless policy H2 and H7, which are included within the Partial Update, both seek to allow for increases in family housing delivery across the borough to meet the need.
Nicholas Gumble	N	I think we should try for the push to 20%, encouraging families to live centrally helps with environmental goals substantially.	A balance must be struck between ambition to deliver more family homes and what can be realistically delivered in practice. It is considered that 15% strikes this balance.
CADRA	Y	Yes, but this raises many questions about facilities and the quality of life for families.	No changes proposed. It is unclear what this comment is specifically referring to. Family sized dwellings in central Reading would be required to adhere to standards set out in policy H5 (e.g. internal space standards) as well as open space provision (H10). Although it is acknowledged that families may prefer to live elsewhere, there will still be those who prefer larger accommodation within the centre and therefore this policy will cater for such.
Montagu Evans (OBO Vintage Capital (No.3))	N	No we do not agree that the Council should update Policy CR6 to seek a greater contribution towards family housing than currently sought in the adopted Local Plan. Revising Policy CR6 as described would materially impact the Council's ability to deliver sufficient homes in the town centre as less homes could be achieved if the Council were to insist on a greater proportion of family sized homes in residential schemes in high density, town centre locations.	No change proposed. The increase to 15% is factored into the HELAA, and the assessed capacity takes this into account.
Damians Bramanis	Y	Yes, this target should be set considerably higher - at 20-25%	A balance must be struck between ambition to deliver more family homes and what can be realistically delivered in practice. It is considered that 15% strikes this balance.
Savills OBO Viridis	No answer	Whilst the need for 3-bed homes is acknowledged based on the SHMA (2016), it is notable that the SHMA was published 8 years ago. It is important therefore that an up-to-date assessment of local housing needs is undertaken in order to appropriately inform housing mix requirements sought during the LPPU plan period to 2041. Our experience is that there is mixed appetite in the market for delivering family (3+ bedroom) housing in the Central Area. As such, simply raising the policy target (especially as high as 15%) is a crude tool to address this and would not reflect the complexities we have experienced e.g. between the rental and private markets, and how the markets in the Central Area and the suburbs interact. As such we suggest the LPPU does not prescriptively set out mix requirements for all sites, but is sufficiently flexible to take into account site-specific location / characteristics, the nature of the development proposals and viability considerations/market conditions at the site. This is particularly important in light of the borough's overall increasing housing needs, and the focus of the spatial strategy for the Borough on town centre brownfield sites where numerous factors may influence proposals and where the NPPF (December 2023) (paragraph 125) encourages significant uplifts in density in town centre areas.	Noted. No changes proposed. An updated assessment of local housing needs has been carried out by RBC. With the town centre likely to make up the majority of housing delivery over the plan period, and the lack of family-sized housing across the borough, there is a need for a greater mix of dwellings on town centre sites.

Opus Works (OBO AEW and McLaren (Broad Street Mall))	No answer	It is important, whilst addressing the shortfall in delivery of family homes, of the last 10 years, policy does not hinder the viability of sites in Central Reading. Flexibility is required for these sites and greater number of family units should only come forward on the larger regeneration schemes that can provide significant open and play spaces and contribute towards schools and healthcare provision. It is therefore suggested that the 5% requirement is maintained, although the policy could be updated to state that the Council require 10%, but only on strategic sites which can deliver the facilities required to cater to an influx of families.	No change proposed. There are clauses in the policy concerning viability should 15% be unviable to deliver.
Opus Works (OBO Moda Living)	No answer	A site-by-site approach is required in the town centre. A greater number of 3-bed family units should only come forward on regeneration schemes that are viable and can provide significant open and play spaces whilst having access to nearby schools and healthcare provision. Care is needed to ensure that policy is sufficiently flexible to ensure that viability and therefore housing delivery is not undermined. See Paragraph 128b of the NPPF, December 2023.	No change proposed. A site by site approach is unlikely to lead to any uplift in the number of three bedroom homes delivered in the town centre. A viability clause is within the policy.
Opus Works (OBO AEW Core Plus Property Fund)	No answer	It is important, whilst addressing the shortfall in delivery of family homes, of the last 10 years, policy does not hinder the viability of sites in Central Reading. Flexibility is required for these sites and greater number of family units should only come forward on the larger regeneration schemes that can provide significant open and play spaces and contribute towards schools and healthcare provision. It is therefore suggested that the 5% requirement is maintained, although the policy could be updated to state that the Council require 10%, but only on strategic sites which can deliver the facilities required to cater to an influx of families.	No change proposed. Retaining the 5% requirement and increasing to 10% on a site by site approach is unlikely to lead to any uplift in the number of three bedroom homes delivered in the town centre
Stantec (OBO Aviva Life & Pensions Ltd))	No answer	The proposed amendment to Policy CR6 which relates to Living in Central Reading, is to increase the minimum proportion of family homes of three or more bedrooms expected on town centre sites from 5% to 10 or 15%. Revisions to this policy should be carefully worded to ensure that it is sufficiently flexible to respond to changing circumstances and priorities.	Noted. It is considered that sufficient flexibility is included.
Turley (OBO Oracle Limited Partnership)	No answer	<p>OLP has significant concerns with this blanket approach to the mix of new homes across the Borough, in particular within the town centre. There remains significant demand in the central area, particularly for Build-to-Rent schemes, of studio, 1 bed, and 2 bed properties. Should the Council have evidence to the contrary, identifying significant increase in demand for 3+ bed dwellings in the centre area, then this should form part of the Local Plan Review evidence base, and be available for scrutiny by stakeholders.</p> <p>OLP have received advice from market agents and BtR providers, who have advised that the predominant market demand for central Reading remains with 1 and 2 bed units, with there being significant uptake for these units within developments and limited vacancy rate. The market for 3 bed units is identified as being more limited.</p> <p>It is acknowledged that central Reading is expected to undergo significant change in order to meet housing needs, with the allocation of additional town-centre sites. With additional complexities and costs in delivering brownfield land, there is limited commercial return on developing additional 3-bed properties, where demand is identified as being low. The rental values per sqm for 3 bed units are lower than 1 and 2 bed properties, despite costs remaining the same. Thus, to increase the requirement for a greater mix of 3 bed properties contrary to market requirements, could jeopardise the viability and therefore deliverability, of schemes and have knock on effects in terms of the ability to deliver affordable housing.</p> <p>The Council's aspiration to deliver more family housing is acknowledged and it suggested that alternative options such as protecting the existing family housing stock in the town are more likely to deliver the desired outcome. The aspiration for more families in the central area should also be balanced through the proposed spatial strategy by ensuring the timely delivery of essential supporting infrastructure within the central area to accommodate and encourage the proposed growth of families in this location in the Borough.</p> <p>As outlined above, it is considered where the provision of 3-bed flats within town centre development is pursued, the development inherently becomes less profitable. As such, less additional value would arise from the development to subsidise affordable housing (either on-site or off site contribution). We therefore consider that</p>	<p>The Housing Needs Assessment includes evidence of the high level of need for larger family properties in Reading. Delivering 15% of dwellings as three-bedroom or more still allows up to 85% to be one or two bedroom.</p> <p>Protecting existing family housing stock will not deliver any increase to meet the identified needs, and is not an alternative to securing provision in new development.</p> <p>It is recognised that supporting infrastructure in the town centre is needed, and the Infrastructure Delivery Plan notes the need for healthcare, early years provision and SEND places in particular.</p> <p>The mix proposed has been part of the Viability Assessment, and the policy includes a clause regarding viability.</p>

		there should not be a requirement for increased provision of 3-bed units in Reading Town Centre above existing policy levels, with a clear link to development viability in assessing the level of 3-bed units to be provided.	
Savills (OBO John Lewis Partnership)	No answer	<p>As referred to above, whilst the need for 3-bed homes is acknowledged based on the SHMA (2016), it is notable that the SHMA was published 8 years ago. It is important therefore that an up-to-date assessment of local housing needs is undertaken in order to appropriately inform housing mix requirements sought during the LPPU plan period to 2041.</p> <p>It is also important that the LPPU does not prescriptively set out mix requirements for all sites but is sufficiently flexible to take into account site-specific circumstances and viability considerations, particularly in light of the borough's overall increasing housing needs. This is particularly relevant for town centre brownfield sites where numerous factors may influence proposals and where the NPPF (December 2023) (paragraph 125) encourages significant uplifts in density in town centre areas.</p> <p>The LPPU should also recognise all forms of housing provision which can contribute to family needs, including for instance the contribution of larger 2-bed units which can provide for families of up to 4 people.</p>	<p>No changes proposed. An updated Housing Needs Assessment has been prepared as a part of the LPPU and this confirms the high level of need for family housing.</p> <p>A viability clause is included within the policy.</p> <p>It is acknowledged that larger two-bed units can provide for 4 person families in some cases, but this is unlikely to have a significant impact on the availability of larger family homes as in practice it is likely that two bedroom homes will only infrequently be on the upper end of this range.</p> <p>A site by site approach is unlikely to lead to any uplift in the number of three bedroom homes delivered in the town centre. A viability clause is within the policy.</p>
M Langshaw	Other	It would be good to increase the provision of 3+ bedroom flats to 15 or 20%. But in connection with air quality, it is also important to check very thoroughly to ensure there is no wind tunnelling around multi-storey blocks, which would negate all the efforts to create a pleasant ground level environment, and would discourage visitors from using adjacent retail and leisure outlets, including in the town centre.	Answer is noted. No changes proposed. Policy CC3 requires new buildings to reduce exposure to wind and other elements and Policy CC8 requires development to safeguard amenity, including, for example, ensuring that it will not result in unacceptable living conditions in terms of wind where development would comprise over 8 storeys.

Q. 59 Do you agree that we should update policy CR7 as described to reflect changes in use classes?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Turley (OBO Oracle Limited Partnership)	Y	<p>The draft Plan Partial Update Review seeks to remove the restriction on the number of 'non-shop' uses in the frontage and enable greater flexibility for town centre uses. This is considered to be a positive amendment and seeks to aligns policy with the 2020 amendments to the Use Classes Order through the introduction of Use Class E.</p> <p>We are in support of this suggested change given the need for town centres to remain flexible and not be stymied by out of date restrictions. This will enable OLP appropriate flexible in line with national planning legislation to curate their tenant line up throughout the centre in respond to changing tenant demands, operator failure and market requirements. This will have a positive impact upon the vitality and viability of Reading Town Centre.</p>	Answer is noted. No changes required.

Q. 60 Do you have any comments on the proposed amendments to reflect progress on sites within the Station/River Major Opportunity Area?

Respondent name	Y/N/Other	Comments	RBC Officer Response
-----------------	-----------	----------	----------------------

James Ford	N/A	Currently is a mess, density looks far too high.	No change needed. Comments are beyond the scope of the Partial Update. Building heights are dealt within under the Tall Buildings policy (CR10), of which is not subject to any changes within the update.
R K Lambra-Stokes	N/A	The SSE depot should be redeveloped into public space to provide a continuation of the city centre out to the River. The river front areas should feature bars and restaurants to celebrate Readings rich river heritage	No changes proposed. Although comments are noted, the former SSE power station buildings along Vastern Road have already gained planning permission via appeal for residential development.
Henry Wright	N/A	No - fully support changes	Answer is noted. No change needed.
Christian Harris	N/A	No building by riverside liability to flood	No change needed. Do not agree. Comments are beyond the scope of the Partial Update as matters relating to flooding are dealt with in the NPPF and under policy EN18, which is not subject to any updates within the partial review. In any case, any new sites which are situated on land that is vulnerable to flooding will be required to adequately address this and ensure development is appropriately situated in relation to the areas with the highest risk of flooding.
Louise Acreman	N/A	Any development along the river should be low rise and in keeping with the height of buildings north of the river. Any higher and it detracts from the river and becomes imposing.	Impacts on the river are carefully considered. A balance must be struck in order to deliver much needed housing and affordable housing.
Opus Works (OBO Moda Living)	N/A	<p>It is considered important to allow flexibility in terms of accommodation product and mix of units, and allow for increased densities over and above that permitted in order to help meet Reading's housing needs in the most efficient and sustainable manner. Increasing the density of existing allocations (with appropriate uplifts) will better ensure that the Council can meet its increased housing requirement which will come through the update to Policy H1. Therefore, we consider that there is a necessity to amend policies to reflect progress on sites, latest legislative requirements now in force and the increased breadth of housing products now available to the Council within the Station/River Major Opportunity Area.</p> <p>In particular, to reflect emerging proposals at 80 Caversham Road as recently presented to the Council by Moda, we consider the following changes (identified in blue) to the current policy wording of Policy CR11e: North of Station are appropriate:</p> <p>'There will be a mix of retail, commercial, community, residential and leisure development on the ground floor activating the streets and spaces including the new northern station square, with uses primarily restricted to including residential and offices on upper floors. Retail will have good pedestrian links to, and will not have a detrimental impact on, the rest of the retail core of the centre. Public car parking will be provided. A high quality route incorporating a green link should be provided through to the Thames. Development should take account of mitigation required as a result of a Flood Risk Assessment, and should consider opportunities to open up the culverted Vastern Ditch and enhance it as an ecological feature.</p> <p>It is also recommended the Council reviews the 'indicative potential' quantum of development proposed in Policy CR11e as part of the local plan review to reflect emerging land uses, mix and design configuration at 80 Caversham Road, which together with the Aviva Life scheme at Reading Station Retail Park, makes up the CR11e allocated site.</p>	<p>Partially agreed. Change proposed. It is agreed that the wider scope of uses at the ground floor should be reflected in the policy, but that residential on ground floors will only be appropriate away from the key frontages that require activation. The addition of "primarily restricted to" is considered to be overly restrictive.</p> <p>The indicative capacity has been amended to reflect the most up to date HELAA.</p>

<p>Stantec (OBO Aviva Life & Pensions Ltd))</p>	<p>N/A</p>	<p>We support the continued allocation of the above site for mixed use redevelopment and note that in relation to Policy CR11: Station/River Major Opportunity Area, the consultation document seeks to update on progress with the allocations located within this Opportunity Area. With reference to CR11e: North of Station/Station Retail Park, within which the above site is located, the consultation document accurately states that: “An application for a significant mixed use redevelopment was received and an appeal against non-determination is ongoing at the time of writing.”</p> <p>As noted below, in relation to Question 3, we anticipate that Policy CR11 will need to be amended to increase the capacity expectations for this site, following a review of the Housing and Economic Land Availability Assessment (HELAA) in order for the Council to meet its development needs. This is consistent with NPPF paragraph 62, reinforcing the importance of the Council optimising site densities on allocated brownfield sites, including at Reading Station Retail Park.</p> <p>See NPPF paragraph 76. In this regard, we reconfirm that the Reading Station Retail Park has no impediment to delivery of its early phases with immediate effect on securing planning permission.</p> <p>We note that the Review of the Reading Borough Local Plan 2019 document published by the Council in March 2023, advised that elements of the 55 Vastern Road appeal decision pointed towards a need to update Policy CR11 with regard to the matters below. While we note that no relevant updates have been referred to in the Regulation 18 consultation, we nonetheless provide our comments as follows:</p> <p>1) The north-south link – whether a visual link should specifically be required and whether the link needs to be direct and whether ‘direct’ means that it should be straight. With appropriate design and wayfinding signage, it is possible to clearly define a route, without the need for this to include a visual connection or for the route to be straight. Any requirement for the future link to include a visual connection or to be straight would be onerous, and with the route through the 55 Vastern Road scheme now fixed, should any such requirement now be added to the Local Plan, this would fall to be delivered via the Reading Station Retail Park scheme, and would potentially risk rendering the scheme unviable, for example, should there be a requirement for a diagonal route through the site, thereby undermining the Local Plan allocation and the Council’s aspiration for the redevelopment of this site and delivery of this important pedestrian/cycle connection.</p> <p>2) Comprehensiveness – the Council committed to providing further guidance on whether or not there is the potential for subdivision of allocated sites. We note that while Reading Station Retail Park and the former Royal Mail site form part of the Policy CR11e allocation, they are in different ownerships, and as such it would be inappropriate to require these sites to be redeveloped in parallel. This is evidenced by the Council granting planning permission for the former Royal Mail site ahead of a permission being granted on the Reading Station Retail Park site.</p> <p>Policy CR11 (viii) already includes the requirement for developments to avoid preventing neighbouring sites from fulfilling the policy aspirations. We suggest that the policy is amended to provide greater clarity, such that it is explicit that individual sites within an allocation, can come forward, provided they do not prevent neighbouring sites from fulfilling the aspirations of the policy. The policy should also make clear that the Reading Station Retail Park and the former Royal Mail sites can be delivered separately, without the need for a joint access, while still satisfying the policy requirement for comprehensive development.</p> <p>Additionally, we note that no reference is made in the consultation document to the Reading Station Area Framework (RSAF) adopted in December 2010. We consider that the LPPU should confirm that the RSAF is rescinded, and delete references to it from the Local Plan, on the basis it is 14 years old and out of date.</p>	<p>Partially agreed. Change proposed.</p> <p>The points about realism of the north-south link in view of outstanding permissions is noted, but it is still considered that it is vital to the function of the link that visual links are provided along as much of the link as possible, without specifying specific start and end points.</p> <p>In terms of comprehensiveness, it is proposed that the supporting text be updated to make clear that development does not need to come forward in parallel. It is not considered necessary to be specific about individual sites, particularly where relevant issues on those sites have already been established by the respective planning permissions.</p> <p>It is not agreed that the RSAF is out of date and that reference should be deleted. Delivery of the strategy is part complete, and there is not considered to be any reason why it is now out of date simply by virtue of its age.</p>
---	------------	---	---

Additional representations submitted via email regarding Station/River Opportunity Area

Respondent name	Comments	RBC Officer Response
Savills (OBO Elder)	We support the Council's continued allocation for the Station/River Opportunity Area as an area presenting significant potential for redevelopment centred around Reading Station for a mix of commercial and residential uses. In regard to 20 Greyfriars Road, it is identified that prior approval is in place for change of use of offices to 43 dwellings. It should be noted that the prior approval consent has now lapsed and has not been implemented.	Noted. This has now been removed from the list of outstanding permissions.
Carney Sweeney (OBO Peveril Securities Ltd)	<p>The adopted Reading Local Plan 2019 allocates the Napier Court site, together with the adjoining Network Rail site, for residential development under Policy CR11i. The plan states that the combined sites have an "<i>indicative potential</i>" of 210-310 dwellings.</p> <p>Peveril Securities' team have undertaken extensive analysis of the Napier Court site and surrounding area and significant optioneering over the course of the last year. This work has concluded that the Napier Court site (excluding the Network Rail site) can accommodate 570 new dwellings.</p> <p>This figure is achievable whilst still delivering the housing mix set out in Policy CR6, ensuring that all the dwellings are designed to NDSS, providing high standards of amenity and stepping the height of the buildings down from the neighbouring Thames Quarter.</p> <p>The NPPF (Dec 2023) requires development plans to contain policies that optimise the use of land (para 12) and make as much use of brownfield land as possible (para 119). As a result, it is considered that the indicative potential of site CR11i needs to be significantly increased to be reflective of the fuller analysis that has now taken place.</p>	Noted. The Council has undertaken its own analysis and come to the view that the likely capacity is not as high as stated here, but nonetheless should be increased above the existing indicative capacity. It is important to note that these are indicative capacities as described in the supporting text and are not policy restrictions, so if a different capacity can be evidenced at planning application stage, this could potentially be appropriate.

Q. 61 Do you have any views on the amendments to CR11d that have been suggested to us?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Henry Wright	N/A	The developer is correct - this site is next to prime transport, retail and green amenity links. I support an increased density and capacity for the site.	Noted.
CADRA	N/A	Apex is already a tall building within a very constrained site, between a busy road and the railway. This poses issues for living conditions. Traffic access would be very difficult. Thames Quarter is already impacted by taxis, delivery vans and other vehicles stopping in front of the building, restricting pedestrians. An equivalent problem for Apex would be even more severe.	Noted. It is agreed that there are potential noise and disturbance impacts, but these are considered capable of mitigation as part of any development.

Additional representations submitted via email regarding CR11d

Respondent name	Comments	RBC Officer Response
Network Rail	The Brunel Arcade and Apex Plaza development site (CR11d) is still available as allocated for a new tall building albeit Network Rail would welcome development that provides some flexibility in the uses than current policy suggests due to commercial viability reasons. Network Rail and our partners are working up proposals to take forward a high density mixed used redevelopment scheme, including station and public realm enhancements with baseline technical evidence gathering and master planning work currently underway. We trust these comments will be useful in the preparation of the forthcoming plan documents.	Noted. No change needed.

ICB	<p>The ICB is aware of the landowner is intending to increase the capacity of the CR11d site at Brunel Arcade and Apex Plaza, where the site is currently be identified to provide 250 to 380 new units. While the proposed number of units to be provided is unknown at this stage, the proposed additional units will inevitably have additional pressure to the existing primary healthcare provision.</p> <p>The ICB requests an appropriate and proportionate mitigation measure should be provided and to ensure that there is adequate primary healthcare provision to accommodate the population growth of this area.</p> <p>Given the strategic location of this opportunity area, the ICB considers that there may be an opportunity to provide a fitted-out facility for relocation of the existing GP practices within the town centre in this opportunity area. However, it is subject to the financial and operational viability of the scheme.</p> <p>The ICB does not own any real estates or has any dedicated funding to commission any feasibility study of the projects. Therefore, any forthcoming applications should be supported by a feasibility study of such provision. If the proposed facility is not financially or operational viable, other offsite mitigation measures can be considered and the findings of the study can help inform the negotiations including the Section 106 planning obligation. This requirement should be formed part of Policy CR11. The ICB has the following recommendation on the wording of Policy CR11:</p> <p><i>CR11: Station/River Major Opportunity Area</i> <i>Development in the Station/River Major Opportunity Area will:</i> x) provide appropriate mitigation measures to ensure the primary healthcare provision can support the new population growth. Developers should undertake a feasibility study of the provision of a primary healthcare facility including the project costing and delivery timescale and relevant infrastructural providers should be informed. If the outcome of the feasibility study sets out that the provision of such facility or infrastructure is not financially and/or operationally viable, other offsite mitigation measures should be considered where appropriate.</p>	Partially agreed. Change proposed to reflect the opportunity to deliver a healthcare facility on a strategically important site close to the station.
-----	---	---

Q. 62 Do you have any comments on the proposed amendments to reflect progress on sites within the West Side Major Opportunity Area? (This question relates to policy CR12)

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Opus Works (OBO AEW and McLaren (Broad Street Mall))	N/A	It is important to allow flexibility in terms of accommodation product and mix of units and allow for increased densities over and above that permitted in order to help meet Reading's housing needs in the most efficient and sustainable manner. Increasing density of existing allocations (with appropriate uplifts) will better ensure that the Council can meet its increased housing requirement which will come through the update to Policy H1. Therefore, we consider that there is a requirement to amend policies to reflect progress on sites within the West Side Major Opportunity Area.	Noted. This policy has been updated to take account of progress.
Theatres Trust	N/A	Having been engaged at pre-application stage on proposals for the Hexagon Theatre, we are supportive of current plans and welcome development and expansion of this building which is an important cultural asset for Reading and its wider catchment. Therefore we are supportive of this site allocation being amended to account for those works.	Answer is noted. No changes required.
M Langshaw	N/A	<p>The need continues for all sites in all the Opportunity Areas to be appropriately linked to one another, to allow safe pedestrian permeability, to ensure that Reading remains a cohesive, and attractive (important in attracting new business and residents) whole.</p> <p>Individual developers will not necessarily respect other buildings - the local plan must enable Reading to ensure they do.</p>	Noted. These matters are best addressed by other policies within the Local Plan, such as CC7: Design and the Public Realm and EN12: Biodiversity.

	<p>Reading needs more formal public squares, to complement the existing Market Place, and the newish square at the Forbury, adjacent to Abbey Square. Perhaps a more formal square could be created around Reading's historic minster Church, bounded by St Mary's Butts, Gun St, Chain St, and the current walkway north-north-west of the Minster?</p> <p>And to at least maintain existing biodiversity no existing green spaces (eg around the former Civic Centre site) should be lost.</p>	
--	--	--

Additional representations submitted via email regarding policy CR12

Respondent name	Comments	RBC Officer Response
ICB	<p>The ICB is aware of the CR12a site at Cattle Market will be amended to increase the number of homes from the existing allocation of 330 to 490 new homes to at least 800 to 1,200 new homes. The proposed additional units will inevitably have additional pressure to the existing primary healthcare provision.</p> <p>The ICB requests an appropriate and proportionate mitigation measure should be provided and to ensure that there is adequate primary healthcare provision to accommodate the population growth of this area.</p> <p>Given the strategic location of this opportunity area, the ICB considers that there may be an opportunity to provide a fitted-out facility for relocation of the existing GP practices within the town centre in this opportunity area. However, it is subject to the financial and operational viability of the scheme.</p> <p>The ICB does not own any real estates or has any dedicated funding to commission any feasibility study of the projects. Therefore, any forthcoming applications should be supported by a feasibility study of such provision. If the proposed facility is not financially or operational viable, other offsite mitigation measures can be considered, and the findings of the study can help inform the negotiations including the Section 106 planning obligation. This requirement should be formed part of Policy CR12. The ICB has the following recommendation on the wording of Policy CR12:</p> <p><i>Development in the West Side Major Opportunity Area will:</i></p> <p>viii) provide appropriate mitigation measures to ensure the primary healthcare provision can support the new population growth. Developers should undertake a feasibility study of the provision of a primary healthcare facility including the project costing and delivery timescale and relevant infrastructural providers should be informed. If the outcome of the feasibility study sets out that the provision of such facility or infrastructure is not financially and/or operationally viable, other offsite mitigation measures should be considered where appropriate.</p>	<p>Partially agreed. Change proposed to reflect the opportunity to deliver a healthcare facility on a strategically important site in the west of the centre.</p>

Q. 63 Do you have any views on the amendment to CR12a at the Cattle Market that has been suggested to us?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Henry Wright	N/A	I support higher housing allocation but retail must be preserved (e.g. through mixed use or higher density development)	No change proposed. Initial findings suggest that retail floorspace needs have decreased within the Borough, while housing needs have risen.
Christian Harris	N/A	No high rises	Do not agree, no changes proposed. Due to the urban nature of the borough, high-density development (such as flats/high-rises), in addition to family-sized housing is often required to suit the needs of the residents, as well as to meet housing targets. Policy H2 and H7, which are included within the Partial Update, both seek to

			allow for increases in family housing delivery across the borough to meet the need.
Lichfields (OBO Thimbleby and Shorland)	N/A	Our client would like us to reiterate that their position remains as per the call for sites submission [see original submission]. The 'alternative configuration' submitted during the earlier call for sites is considered to be consistent with, and supported by emerging aspects of the LPPU (LPPU), including: <ul style="list-style-type: none"> • LPPU identified housing need for Reading • Changing the approach of policy H2 relating to density • The LPPU identifies a requirement to review the need for retail, leisure and culture uses post covid. • The LPPU proposes to incorporate the new objectives of the latest Transport Strategy into the emerging Plan. 	Noted. The allocation for the site reflects an increase in the potential capacity and removal of the retail element of the allocation.
The Woodland Trust	N/A	No objection to increased density but opportunity should also be taken to increase tree canopy cover	No changes proposed. Tree canopy cover is addressed under policy EN14. Specific details and requirements on tree coverage will be assessed during the planning application stage.
M Langshaw	N/A	Reducing the amount of retail seems sensible. The increase in the number of dwellings seems very substantial....	No change proposed. Initial findings suggest that retail floorspace needs have decreased within the Borough, while housing needs have risen.

Q. 64 Do you have any comments on the proposed amendments to reflect progress on sites within the East Side Major Opportunity Area? (This question relates to policy CR13)

Respondent name	Y/N/Other	Comments	RBC Officer Response
Paul Oliver James Melville	N/A	no but bringing in a bus lane will only increase congestion and further pollution.	Do not agree. It is considered that establishing a bus lane will reduce congestion by provided a public transport option for residents and visitors.
Karen Doyle	N/A	Keep the retail shops please	Some retail is proposed to be retained, but initial findings of the Commercial Development Needs Assessment indicate that the need for retail floorspace has decreased.
Louise Acreman	N/A	Any development should not be built on the flood plain or involve removal of trees or green spaces.	No changes proposed. Development within Flood Zones must adhere to policy requirements as set out within EN18 and the Sequential and Exception Tests as per the NPPF. Biodiversity and tree matters are set out at policies EN12 and EN14 respectively, and will be assessed during application stage to the satisfaction of the council.
Montagu Evans (OBO Abrdn)	N/A	We agree with the principle to acknowledge and reflect progress within the East Side Opportunity Area, including reflecting which parts of the site are under construction and completed. The area is continues to attract significant investment such as that at Forbury Retail Park by Abrdn, as such we consider that it is necessary to undertake a comprehensive review of policy CR13. CR13 currently stipulates that the allocation should provide 1,531-2,285 dwellings, which is based on the Housing and Economic Land Availability Assessment (HELAA) (November 2017). Given that this evidence base	The policy ranges have been reviewed and in many cases increased, although in this case it also accounts for the removal of part of the site that is now part completed and part under construction. The Tall Buildings Strategy, on an analysis of the town centre, did not consider this an appropriate location for tall buildings. Conditions have not

		<p>is now over six years out of date a review of the allocation against an up to date HELAA is very much needed. The policy is therefore not justified by up to date evidence.</p> <p>Furthermore, the allocation and majority of the opportunity area is limited by the blanket tall buildings policy. The tall buildings policy in particular and the testing of tall buildings both within and outside the areas of potential for tall buildings' under Policy CR10 urgently needs a review based upon up to date townscape analysis. ABRDN firmly believes that this 'area of potential' should be reviewed and expanded, especially given the definition of tall buildings in CR10 is so conservative (10 storeys of commercial or 12 storeys of residential).</p> <p>Therefore, as part of the review of CR13 a robust and detailed townscape analysis should be undertaken. The analysis will demonstrate where greater density and height could be accommodated within the Site allocations, which would further support the creation of a diverse and varied townscape particularly in relation to facilitating varied heights across the entirety of the allocation improving the townscape as a whole both from within the allocation and from external views towards the opportunity area.</p> <p>In respect of density targets, we provide further commentary below, but we request a review of the density targets for the allocation. This should be carried out as part of the comprehensive review and be informed by an up to date HELAA as well as a detailed townscape analysis. The revised density targets have changed from their unrealistic starting point but are still not positively prepared or justified.</p>	<p>changed in a way that renders this analysis out of date, and it is not proposed to include this area within the tall buildings cluster.</p>
M Langshaw	N/A	<p>New developments to be respectfully integrated into Reading's existing grain - the proposed Design Guide is much needed!</p>	<p>Comments are noted. No changes needed. Further information on Design Codes can be found in Chapter 5 of the LPPU (Policy CC7)</p>

Additional representations submitted via email regarding policy CR13

Respondent name	Comments	RBC Officer Response
ICB	<p>The ICB is aware of the CR13c site at Forbury Business Park and Kenavon Drive will be amended to increase the number of homes from the existing allocation of 190 to 285 new homes to at least 430 to 450 new homes. The proposed additional units will inevitably have additional pressure to the existing primary healthcare provision.</p> <p>The ICB requests an appropriate and proportionate mitigation measure should be provided to ensure there is adequate primary healthcare provision to accommodate the population growth.</p> <p>Given the strategic location of this opportunity area, the ICB considers that there may be an opportunity to provide a fitted-out facility for relocation of the existing GP practices within the town centre in this opportunity area. However, it is subject to the financial and operational viability of the scheme.</p> <p>The ICB does not own any real estates or has any dedicated funding to commission any feasibility study of the projects. Therefore, any forthcoming applications should be supported by a feasibility study of such provision. If the proposed facility is not financially or operational viable, other offsite mitigation measures can be considered, and the findings of the study can help inform the negotiations including the Section 106 planning obligation. This requirement should be formed part of Policy CR13.</p> <p>The ICB has the following recommendation on the wording of Policy CR13:</p> <p><i>Development in the East Side Major Opportunity Area will:</i> xi) provide appropriate mitigation measures to ensure the primary healthcare provision can support the new population growth. Developers should undertake a feasibility study of the provision of a primary healthcare facility</p>	<p>Partially agreed. Change proposed to reflect the opportunity to deliver a healthcare facility on a strategically important site in the east of the centre.</p>

including the project costing and delivery timescale and relevant infrastructural providers should be informed. If the outcome of the feasibility study sets out that the provision of such facility or infrastructure is not financially and/or operationally viable, other offsite mitigation measures should be considered where appropriate.

Q. 65 Do you agree with the proposed changes to CR13a to increase the emphasis on culture and heritage?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Friends of Reading Abbey	No answer	We support the proposed changes to CR13a (Reading Prison) to place greater emphasis that a future cultural, heritage and/or leisure use is absolutely essential. We support the proposed changes to CR15 (Reading Abbey) to include the Prison site as part of the Abbey Quarter and that the areas should link into and complement one another. In both respects we would make clear that the Prison site is an integral part of the Abbey Quarter, it is covered by the Abbey's Scheduled Ancient Monument listing, and it is essential that they are planned together in ways which complement the cultural and heritage setting of the Quarter, and open up public linkages between and within all parts of it.	Noted.
R K Lambra-Stokes	Y	But could go further and ensure public access and ensure that Key features of the prison must be maintained.	The proposed language clearly states that the historic significance will be preserved and uses will provide a wider benefit to the town's residents.
Henry Wright	Y	It should absolutely be maintained as a cultural venue to improve the cultural life of Reading as a distinct and unique place that is not London.	Answer is noted. No change proposed.
Christian Harris	Y	No comments	Answer is noted.
Damians Bramanis	Y	Yes, this site is of a high cultural and heritage importance to Reading, and should be a space that benefits the community.	Answer is noted.
Historic England	Y	Yes, we support the proposed changes and would happily discuss this in more detail as needed. We would be looking for heritage to play a key role in place-shaping, facilitated by the local plan. The role of heritage in place development is considered in one of our recent "Heritage Counts" publications. This approach is fundamentally strategic in nature, which we infer is what is being proposed, rather than a "bolt on" idea. Flowing from this would be the integration of heritage into different aspects of the scheme's design from its earliest point as a core design principle.	Noted.
Tricia Marcouse	Y	Very definitely	Answer is noted.
The Woodland Trust	Other	No objection to increased cultural emphasis but opportunity should also be taken to increase tree canopy cover	No changes proposed. Tree canopy cover is dealt with under policy EN14.
M Langshaw	Y	Reading has a wonderful heritage that needs nurturing.	Answer is noted. No changes required.

Q. 66 Do you have any views on the amendment to CR13c on Kenavon Drive and Forbury Business Park that has been suggested to us?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Christian Harris	N/A	3rd bridge	No changes proposed. RBC's position on Cross Thames Travel is set out in policy TR2 and within the Local Transport Plan (2040).

Anthony Acka'a	N/A	I agree that more homes can be built there than what has been allocated and it would be wasteful not to take advantage of this space to build more densely	Noted.
CADRA	N/A	This area forms an important part of the setting to the Abbey Quarter and the Listed Reading Prison. An increase of that scale has the potential to seriously impact those settings.	Noted. This will be carefully considered in light of heritage policies within the Local Plan and through discussions with Historic England.
Louise Acreman	N/A	The number of homes should not be increased as it is not in keeping with the site.	Do not agree. This site is in an accessible location and can be sensitively development to improve the area and provide much needed housing.
Savills OBO Viridis	N/A	We have suggested in our response to the recent 'Call for Sites' that the land at Kenavon Drive is capable of delivering a high quality development of greater numbers than currently allocated in the Local Plan. Pre-application engagement with the Council and the undertaking of a Design Review Panel has confirmed that the Site has the potential to deliver in the order of 430 – 450 dwellings in a mix of open market, affordable and Build to Rent (BTR) units. The new units could be arranged in 4 blocks of development ranging from 4 to 9 storeys in height. It is clear that the site therefore has greater potential to contribute towards delivery of the housing needs of the Borough than the adopted Local Plan would suggest. It will be important for the Council to be robust and accurate in terms of site capacity assessments given the pressure to deliver housing within its administrative boundaries to meet its needs under the Standard Methodology (see previous comments). Development of greater numbers of dwellings at the site could assist in reaching a number of the Local Plan objectives (e.g. objectives 1 and 2). The site is in a highly sustainable location, is not subject to any legal or policy restrictions (save that relating to talk buildings, see above) or significant constraints; it is capable of delivering the scale of development proposed in the recent 'Call for Sites' and Policy CR13c should be amended to reflect this.	Change proposed. It is considered that there is a case for a significant uplift in capacity on this site, and the amended allocation reflects this. The level of homes in any pre-application discussions has yet to be fully tested through the planning application process, but indicatively could fall within the range of the policy.
The Woodland Trust	N/A	No objection to increased density but opportunity should also be taken to increase tree canopy cover	No changes proposed. Tree canopy cover is addressed under policy EN14. Specific details and requirements on tree coverage will be assessed during planning application stage to the Councils satisfaction.
M Langshaw	N/A	Proposals seen so far suggest that the higher number of dwellings is too high for this site. It would be better to stick to the lower number of dwellings, originally proposed.	Do not agree. This site is in an accessible location and can be sensitively development to improve the area and provide much needed housing.

Q. 67 Do you agree with the proposed changes to the existing allocated sites in Central Reading? Do you want to see any other changes? (This question relates to policy CR14)

Respondent name	Y/N/Other	Comments	RBC Officer Response
R K Lambra-Stokes	N	Site Cen1 Aquis House should be largely public space providing a convenient thoroughfare. Site Cen2 Library: although it could benefit with some modification, the building is sufficient, central, easy to get to and its history would be respected if it continues to be occupied by the Library. Site Cen2 full or partial redevelopment of hotel site for hotel only, not for additional uses and its not conveniently located and is best served as a mid-to-high end hotel, spa and sports club. Loss of this hotel would be a loss for Reading and the hotel provision it offers to visitors.	It is considered that Aquis House and the Central Library site are in accessible locations and can be sensitively development to improve the area and provide much needed housing. Developing Aquis House for an open space is not deliverable. The decision to move the library has already been made and permission granted. The hotel site is not proposed to be included within the plan.
Henry Wright	Y	I would like to see King's Road narrowed and turned into an avenue with cycle lane and trees in middle. It lacks green space despite its large width.	This is not within the scope of the Local Plan.

Christian Harris	Other	No high rise buildings	Do not agree, no changes proposed. Due to the urban nature of the borough, high-density development (such as flats/high-rises), in addition to family-sized housing is often required to suit the needs of the residents, as well as to meet housing targets. Policy H2 and H7, which are included within the Partial Update, both seek to allow for increases in family housing delivery across the borough to meet the need.
Karen Doyle	No answer	Crowne Plaza Reading, Richfield Avenue (Cen4): potential full or partial redevelopment of hotel site for hotel with ancillary food and drink, residential use, residential care and/or filling and EV charging station; Keep as a hotel but improve river frontage and make a pleasant place for drinking and eating. No residential.	No change needed. This site is not proposed to be included as a draft allocation.
Montagu Evans (OBO Abrdn)	No answer	The increase from previous density targets combined with the presumption of arbitrary height limits means that there needs to be an urgent review of where tall buildings should be accommodated in Reading not just in the currently defined 'areas of potential for tall buildings' in CR10. This should be based upon an up to date townscape analysis, and will facilitate an alignment of the development framework with the proposed updates to housing policy and densities, also discussed within this letter. Without this townscape review the framework would contradict itself and associated objectives particularly in relation to housing delivery. The plan would not be positively prepared or justified.	Policy CR10 is now proposed to be subject to an update. However, achieving high densities does not necessitate tall buildings, and tall buildings have disproportionate effects on the character of an area. The Tall Buildings Strategy remains an appropriate basis for continuing to implement the strategy that has already been agreed.
Savills (OBO John Lewis Partnership)	No answer	Regarding land at Mill Lane (Cen3) The Site is subject to an existing Local Plan allocation (Policy CR14g). However, for the reasons set out below, this allocation is not deliverable. The LPPU consultation document (paragraph 12.39) acknowledges that there have been changes to a number of sites listed in Policy CR14 and therefore proposes to remove four existing allocations, including CR14b, CR14c, CR14f and CR14k. However, CR14g is not identified. Whilst the John Lewis depot (Cen3) (part of the existing CR14g allocation) is identified as a new allocation (paragraph 12.41), as below, it is recommended that the LPPU clarifies that the existing CR14g allocation is deleted and is replaced by a new allocation.	Noted. The existing CR14g is replaced by a new allocation (Oracle Riverside East) that excludes the Mill Lane site. The Mill Lane site is proposed to be included as a separate allocation (CR14r).
The Woodland Trust	Other	We note the existing trees, including trees subject to TPOs, on the Mill Lane, Richfield Avenue, George Street, Napier Road, and Kings Road sites, and recommend their retention be specified.	Noted. The retention of existing important trees is specified in the relevant policies where appropriate.

Q. 68 Do you have any comments on any of the potential additional allocations to policy CR14?

Respondent name	Y/N/Other	Comments	RBC Officer Response
R K Lambra-Stokes	N/A	Very little in the improvement to culture and leisure assets. Winter sports provision (eg. Ice rink / Snow slope) could be considered in Reading.	Not agreed, no change proposed. Policy CR15, which relates to the Abbey Quarter, is proposed to be updated to emphasise the relationship between itself and the Reading Prison to strengthen the linkages between these two heritage/cultural assets. In addition, policy RL2, which relates to the scale and location of retail, leisure and cultural development, is proposed to be updated to ensure that the latest needs for retail, leisure and cultural uses are referred to. Although specific types of

			development to be brought forward (such as winter sports provision) is not included, if such an application is submitted by a developer in the future, then it can be assessed against these policies.
Henry Wright	N/A	All seem sensible - they should be granted if possible.	Noted. No change needed.
Margaret Ormonde	N/A	My specific comments and observations relate to the Crowne Plaza Hotel proposals. It would be sad to see the demise of a hotel/ restaurant/leisure facilities at this location. The site has been occupied by a hotel on this site for at least 130 years. There are now very few riverside establishments that have riverside frontage and public access. Even the wonderful Thames Lido you would never know was by the river. Pipers Island restaurant closed. Please reject any proposals that might result in the loss of this important historic/current landmark location.	This site is not proposed to be included as a development location.
Nicholas Gumbridge	N/A	Reading Central Library: I would rather such a prime building and location was kept and maintained as a communal space for people to meet and engage in leisure. Tesco Extra, Napier Road: Location doesn't have very good infrastructure for houses, no regular bus route, the walking route isn't pleasant and isn't cyclable resulting in cyclists having to navigate the Vastern road traffic which isn't ideal.	As the library use is to cease, there is no indication that provision of a leisure or community space in its place would be viable or deliverable. There are measures necessary to enhance the accessibility of Napier Road, which will be identified in the policy.
CADRA	N/A	Where possible all such redevelopments, which are close to the river, need to include a good mix of residential and leisure with wide appeal. There should be easy access and routes to the river. Between the bridges the south bank is developed up to the towpath. Developments need to increase the green space along the bank, by the landscaping of the access routes. Specifically: Crowne Plaza Reading, Richfield Avenue (Cen4): potential full or partial redevelopment of hotel site for hotel with ancillary food and drink, residential use, residential care and/or filling and EV charging station. The Crowne Plaza site has considerable historical significance. The current hotel follows the White Hart Hotel and two versions of the Caversham Bridge Hotel. It serves as an important gateway to Caversham and the St Peters Conservation Area. It forms part of the view from the Conservation Area and is highly significant location on the River Thames. The adjacent Council car park is well used, providing access to many riverside activities. It is important that the hotel provides sufficient car parking to support its residents and activities, without putting pressure on the Council car park or neighbouring streets. 2 Norman Place (Cen5): potential redevelopment of office for a residential development of around 240 dwellings The general principles above should apply. Reading Bridge House, George Street (Cen6): potential redevelopment of office building for 300 to 400 dwellings. Reading Bridge House sits directly on to the Locally Listed Reading Bridge which celebrated its centenary in October 2023. This is a highly sensitive site and CADRA has significant concerns over potential demolition and redevelopment. The existing building is of its era and has many merits. Traffic access would be very difficult. Thames Quarter is already impacted by taxis, delivery vans and other vehicles stopping in front of the building, restricting pedestrians. The general principles above should apply.	Noted. Regarding Crowne Plaza, the site is not proposed to be included as an allocation within the Local Plan Partial Update. Regarding 2 Norman Place and Reading Bridge House, the sites are proposed to be included as a residential allocation, but the capacity proposed reflects the sensitivity of the sites alongside the River Thames. Regarding Napier Road, there is no indication that a leisure allocation would be deliverable, and the site is considered to be suitable for a residential allocation, albeit with the capacity reflecting the particular landscape sensitivities of the location.

		<p>Tesco Extra, Napier Road (Cen7): potential development of part of the existing car park for 150-200 dwellings.</p> <p>This is a sensitive site with important natural landscape and links to the important pedestrian route along the riverbank. from multi-story buildings. Some kind of low-rise leisure use would be preferred.</p>	
<p>Montagu Evans (OBO Vintage Capital (No.3))</p>	N/A	<p>Regarding Reading Bridge House (CEN6)</p> <p>The property has reached the end of its economic life and occupational demand is insufficient to meet the cost of ongoing repairs and upgrading works required for the building to remain operational as an office. There is no realistic prospect of continued office use in the long-term and the property will become vacant. The broader context is that Reading suffers from an acute oversupply of office accommodation and has been losing some office stock to alternative uses since adoption of the 2019 Local Plan. Despite losing some office stock, levels of vacant office accommodation have increased, which highlights a lack of demand and a rebalancing of office stock in the Borough.</p> <p>Collectively this shows it is not necessary to insist on a site allocation policy expecting continued office use on the Site and instead it is incumbent on the Council to consider alternative uses. Option 1 should therefore be discounted.</p> <p>Options 2 and 3 propose residential use through conversion or redevelopment at prevailing town centre densities. Our client is supportive of residential use under both options but each are substantially below our client's capacity study which shows that a scheme of between 300-400 dwellings can be achieved. This formed the basis of the recent Call for Sites submission and would help offset the forecasted shortfall in housing over the Plan period. The vision is for a high-quality residential-led scheme at this important gateway to Reading Town Centre.</p> <p>Any future allocation must not be unduly restrictive in placing an arbitrary upper threshold on the Site's capacity, which should fall to be determined at planning application stage where all technical considerations are properly explained and assessed. This flexibility must also extend to the types and tenure of residential that may be found acceptable and enable either conversion or redevelopment proposals to come forward. At this stage both Options 2 and 3 are potential options for the site. As the Plan progresses it is possible that there is greater clarity on this as pre-app discussions with the Council are progressed.</p>	<p>Noted.</p> <p>Reading Bridge House is considered to be potentially suitable for residential either as a conversion or redevelopment and is proposed to be identified as an allocation in the Pre-Submission Draft Local Plan Partial Update.</p> <p>In terms of capacity, the HELAA process has identified that the site is unlikely to be able to support 300-400 dwellings, which would necessitate building at considerable height. However it should be noted that the identified capacities are indicative and this will need to be considered in full at planning application stage, and do not therefore place any arbitrary limit on the capacity.</p>
<p>Louise Acreman</p>	N/A	<p>Crowne plaza- any development should add to the aesthetics along the river, increase the number of trees without affecting those already there. Any development along the river should be low rise and in keeping with the height of buildings north of the river. Any higher and it detracts from the river and becomes imposing. Any development should incorporate the existing number of parking spaces. Any development should not be built on or affect the flood plain.</p>	<p>The Crowne Plaza site is not proposed to be included within the Pre-Submission Draft Local Plan Partial Update.</p>
<p>MRPP (OBO Tesco Stores Ltd)</p>	N/A	<p>Site CEN7: Tesco Extra, Napier Road</p> <p>The first alternative option set out within the consultation document is for no allocation; this is not considered an appropriate response to the opportunity presented by the identified site.</p> <p>As set out within the appended call for sites submission, our client has identified that the area of car parking land could be developed without compromising their operational requirements, arising from changes to the retail climate and greater support for sustainable travel. There is an identified and quantifiable need for land suitable for residential development within the Borough, and there is local and national preference for this land being brownfield in nature and sustainably located. While there are 'constraints' identified within the consultation document, these were addressed within the Call for Sites submission and would be matters for consideration</p>	<p>Noted.</p> <p>Both of the sites, at Napier Road and Portman Road, are considered to be potentially suitable for residential development and are proposed to be identified as allocations in the Pre-Submission Draft Local Plan Partial Update.</p> <p>In the case of the Napier Road site, there remain particular sensitivities with the landscape sensitivity of the area in close proximity to the River Thames and where the Thames has a more rural character</p>

	<p>through design development, and should not deter identification and allocation of the site for the principle of residential development.</p> <p>There is an identified need for land for housing development and the identified Site Cen7 at Napier Road is suitable and available for such development. This constitutes an ideal opportunity for allocation within the emerging Local Plan.</p> <p>The second alternative option identified is for additional retail development at the site. While the site is currently part of the wider foodstore use at the Tesco Extra store and is within the town centre / Central Area, the site does not lie within the Primary Shopping Area as defined by Policy CR1, the Council's preferred location for new retail development. The development of additional retail uses, rather than residential use, is thus not considered to be appropriate.</p> <p>The third alternative option identified is for development at "<i>more typical urban densities</i>", which would be for circa 100 dwellings as opposed to 150-200 dwellings put forward with the site nomination. It is considered that given the identified need for residential development and the particular suitability of this site, development at higher densities should be sought.</p> <p>The site lies within the defined Central Area. There is further support for making effective use of land within the NPPF. This is a particularly important consideration with respect to the preparation of the emerging Partial Update given the significantly increased housing requirement.</p> <p>Indeed, Policy H2 of the emerging Plan document recognises the substantial support in national policy for optimising the use of land.</p> <p>It is therefore considered that alternative option 3 would be inappropriate (and not supported by the emerging Policy H2), and thus the site should be identified and allocated for residential development of a higher density.</p> <p>The nature of the site lends itself to sustainable development as, while it constitutes brownfield land, there is no existing building on the site and its current use (area of foodstore car park) has been identified by our client as being surplus to operational requirements. There would therefore be no loss of any productive use as a result of redevelopment, and no significant barriers to deliverability from the need for cessation of existing operation prior to development.</p> <p>By comparison, several of the sites identified at Appendix 2 within Central Reading are either in use as existing (e.g. for retail, office, or community uses) or are identified for particular other types of development (e.g. within the Primary Shopping Area or Office Core under adopted Policy CR1). Redevelopment of such sites may result in the loss of existing or identified uses, or require the incorporation of other uses within a mixed use proposal, which can raise further constraints or difficulties. These sites may therefore be considered by the Council to be more suitable for continuation of or new development for uses other than residential development.</p> <p>By comparison Site Cen7 represents an ideal opportunity for unhampered delivery of significant residential development. Second, in relation to the above Site Cen7 would not require any substantial loss or demolition of existing buildings or structures given its existing use as car parking land. There is substantial and increasing local and national support for the minimisation of embodied carbon associated with development. This is recognised within the direction set out under emerging Policy CC2 and the "<i>presumption against demolition</i>".</p>	<p>despite its proximity to the town centre. It is considered that urban densities are more likely to be appropriate here, although it should be noted that the identified capacities are indicative and this will need to be considered in full at planning application stage.</p>
--	--	---

		<p>Several of the sites set out at Appendix 2 of the Plan are promoted on the basis of demolition and redevelopment for residential uses. Indeed the conversion of existing office buildings is identified as an 'alternative option' by the Council in relation to several of the sites, but it should be noted that this could result in the delivery of small unit numbers. No such dilemma is applicable to Site Cen7 and it is therefore considered a preferable option for allocation.</p> <p>Third, Site Cen7 benefits from being in a central location with excellent connectivity and access to amenities. However, the site also benefits from being relatively unconstrained in terms of its surrounding existing uses. This would therefore limit the amenity issues which often constrain the development of town centre sites.</p> <p>Many of the other sites identified lie within more densely developed areas containing a wide mix of uses, which may conflict with and/or limit the delivery of the residential accommodation required under the Partial Update. Further it is noted that many of the identified sites will fall within or affect areas of particular heritage sensitivity. Site Cen7's relative separation from existing uses, despite being centrally located and previously developed, further provides preference to other sites identified.</p> <p>Fourth, Site Cen7 constitutes a relatively large site within the Central Area, capable of making a substantial contribution towards the identified housing need, but remains deliverable towards the beginning of the plan period. The site is under the single, freehold ownership of our client and is the subject of substantial historic and current market interest. Many of the other sites identified would be subject to more complex ownership arrangements and require land assembly, or would make a comparatively small contribution to the substantial housing need identified. The relative ease of deliverability of this site despite its size and location further supports its proposed allocation.</p> <p>Site Cen7: Tesco Extra, Napier Road is therefore considered to be suitable and deliverable for a large quantum of residential development, and preferable to many of the other sites identified within the consultation document.</p> <p>Land at Portman Road, Reading On behalf of our client, we would also identify a further site, Land at Portman Road, Reading, RG30 1AW, for identification and allocation for residential development within the emerging Partial Update.</p> <p>The Portman Road site comprises approximately 0.77ha of surplus car parking land identified by our client, and is presently the subject of a full planning application (ref. 231041) for residential development comprising 80 apartments. The application remains under consideration by the Council, and the applicant, Ridgepoint Homes, have also made representations to this consultation to promote this site for allocation.</p> <p>The site is very sustainably located within the existing developed area of Reading, a short distance from Reading West Station and the further transport options and amenities offered by Oxford Road to the south. The site is considered to be relatively free of any constraints to development as supported by the above planning application documentation, and would further contribute towards the local and national objectives of housing delivery and the optimisation of under-utilised and brownfield land. Further, the site is in single ownership by our client with an agreement in place with Ridgepoint Homes for the site's development.</p>	
Savills (OBO Redefine Hotels Reading Ltd)	N/A	<p>Re Cen4 (Crowne Plaza, Richfield Avenue) Our client has a long leasehold interest in the Site and is in an ongoing discussion with the freehold owner about the opportunity for development on the Site. They are supportive of this in principle and subject to the detail as this is developed.</p>	<p>Noted.</p> <p>After consideration of the proposal, it was considered that there was little suitability for any residential development on the site, in particular due to the constraints on the car park area. Whilst</p>

	<p>The existing hotel attracts significant business and is continuing to prove to be a valuable asset within our client's hotel portfolio. In the short-term, it is therefore intended that the hotel will be retained on the Site and continue to operate. However, the car park to the west is available now and provides an opportunity for redevelopment within the next 5-10 years.</p> <p>The existing use of the Site is not protected in policy terms and it is considered a suitable location for development given it comprises existing built form on brownfield land within an existing built up area. It is sustainably located within and on the edge of Reading Centre and just south of Caversham Local Centre, 800m north of the Reading train station. It therefore benefits from good access to town centre facilities and transport links.</p> <p>As noted above, the Site is available, having been identified for partial redevelopment by the owner and not subject to any identified constraints that are considered to preclude the Site from partial redevelopment.</p> <p>See Call for Sites submission for initial appraisal of site</p> <p>Since, and in light of the performance of the hotel itself, our client has been exploring the potential for an electric vehicle charging station / garage on the car park element of the Site supported by complementary commercial / retail and residential uses. From this very initial testing, it would suggest that "Alternative Option 5 as set out at Appendix 2, and with some broadening of uses (as set out under recommendations below), is likely to be the deliverable option on the car park element of the Site.</p> <p>The Site provides an opportunity to contribute to meeting [the] identified housing need [as set out within the latest Housing Needs Assessment].</p> <p>From the data available it seems that in the borough there is a shift towards private renting (from owner occupation), with RBC recognising the role that 'build to rent' developments will play in the Central Reading stock.</p> <p>In response to Question 41 of the consultation document, we agree that this new policy on co-living should be included but in response to Question 42, that this should also be permitted on sites allocated for residential where they met the other relevant criteria of the policy (such as town centre / edge of centre locations like the Site). Alongside, it is outlined that there is an increasing demand for older persons accommodation to provide for the ageing nature of Reading's population. The partial development of the Site has the potential to include the delivery of residential (C3) and/or co-living (Sui Generis) and/or a care home (C2) to meet these needs identified through the LPPU and as appropriate land uses in this sustainable edge of centre location where the focus for housing delivery is proposed to be strengthened.</p> <p>In addition to the above, the Site provides an opportunity to contribute to the changing needs of the borough as recognised in the recent consultation draft of the Electric Vehicle Charging Infrastructure Strategy 2023 and considered further within the consultation document in relation to Policy TR5. Located on the primary existing highway network on the edge of the town centre, the Site, in delivering an electric vehicle charging station /garage could provide essential infrastructure to meet the range of needs that have been identified. This includes residents of Reading, commuters and visitors as well as businesses providing local services. It is therefore considered that this use would be consistent with the objectives and proposed drivers of the amended policy. As such, and in response to Question 47 of the consultation document, we agree with the proposed updates to Policy TR5 which would provide a presumption in favour of charging infrastructure, subject to caveats around areas such as accessibility, amenity, trees and heritage.</p>	<p>there may be some potential for additional hotel floorspace, in particular on the existing footprint, there is no identified need for additional hotel rooms and therefore no need for the Local Plan to identify a site to meet these needs. Such a proposal can be considered through the development management process.</p>
--	--	--

		<p>Finally, the principle of an element of commercial / retail on the Site, as town centre uses, and in support of the above is considered to be acceptable and appropriate across all levels of planning policy.</p> <p>In response to Question 68 of the consultation document, it is agreed that the Site should form an additional allocation within the LPPU.</p> <p>We support the identification of the Site for partial redevelopment under allocation 'Site Cen4' and request that in line with the above, it is taken forward through the next stage of the LPPU. In refining the allocation and proposed uses, it is recommended that "Alternative Option 5" is amended to confirm the Site's suitability for the following:</p> <p>"A mix of uses through the partial redevelopment of the Site, to include retained hotel (Class C1) with ancillary food and beverage offering (Class E) alongside new development on the car park to comprise an electric vehicle charging station/garage (Sui Generis), town centre uses (Class E), residential accommodation (Class C3 or Sui Generis) and/or care home (Class C2)."</p>	
Historic England	N/A	<p>Aquis House, 49-51 Forbury Road and 33 Blagrave Street (Cen1): we would not support the redevelopment of this site to deliver a building 10-15 storeys in height. This would not be in keeping with the character of the conservation area in which this site partially sits, and it would challenge the primacy of the Grade II* Town Hall diagonally opposite. We encourage the consideration of alternative options, potentially options 3 & 4 together. This is an area of good quality townscape. Any new development needs to be of an appropriate scale, with quality detailing. Should the Council focus only on the redevelopment of land outside the conservation area, proposals should still take into account potential impacts of the setting of heritage assets.</p> <p>Site Cen2: Reading Central Library, Abbey Square: the presence of part of the scheduled monument of Reading Abbey should not be considered as a 'do not develop' situation but the approach would have to be very careful. Development should be iterative and heritage-led. Although there have been previous excavations in the 1970s, it is quite possible that an adequate assessment of the archaeological remains would not be achieved until after demolition and further archaeological evaluation by trenching. Design should then be strongly informed by that information so that the impact on the scheduled monument and any further nationally significant remains is beneficial, and allows visitors to the area to appreciate the relationship between outlying Abbey buildings, the main Abbey complex, and the Holy Brook.</p> <p>Site Cen4: Crowne Plaza Reading, Richfield Avenue: should this site be taken forward, the relationship between the site and St. Peter's conservation area should also be considered further, and the heritage assets within the conservation area.</p> <p>Site Cen8: Kennet Place, Kings Road: note also the proximity to Reading Abbey Scheduled Monument. This may provide an opportunity for any redevelopment to connect with and/or be influenced by the history of the nearby Abbey Quarter.</p>	<p>Noted.</p> <p>Regarding Aquis House and 33 Blagrave Street, the sites are included as allocations, but the criteria make clear the heritage considerations and the level of capacity that is identified involves developing at a similar height to existing and do not require a tall building. However, the final capacity of sites will ultimately be a matter to be considered at planning application stage.</p> <p>The importance of the Scheduled Ancient Monument for the Central Library site is noted, and this is reflected in the policy criteria.</p> <p>The Crowne Plaza site is not proposed to be taken forward as an allocation.</p> <p>The Kennet Place site is for a change of use rather than development and opportunities to connect into the Abbey Quarter are therefore likely to be limited.</p>
Opus Works (OBO Mapledurham Properties Ltd)	N/A	<p>Further due diligence has been undertaken on site that has enabled a more considered and wholly deliverable scheme to come forward.</p> <p>See attached with submission a Vision Statement, Daylight and Sunlight report, Heritage, Town and Visual Impact Assessment, Highways and Access Report, and Geothermal technical advice.</p> <p>The resultant proposals are suitable, achievable and deliverable and offer a step-change in accommodation in the immediate locality. Importantly, the proposals:</p>	<p>Noted.</p> <p>Regarding Sapphire Plaza, the site is included as a proposed allocation for residential development. It should be noted that the Council's assessment of the capacity of the site for additional development is lower than the nomination, due to constraints including the relationship to existing residential</p>

	<ol style="list-style-type: none"> 1. Re-address the Kennet Canal, offering substantial improvement to an area that is currently subject to anti-social behaviour and which blights potential for walking and cycling trips from the east of the site into the town centre 2. Offer opportunity to connect to the adjacent public open space, to the north 3. Enable a comprehensive regeneration, which allows for a highly sustainable scheme to come forward 4. Significantly increases urban greening, biodiversity net gain and renewable energy generation, maximising on-site geothermal heating and cooling 5. Provides a range of accommodation to meet all housing needs in a safe, private environment that provides internal and external amenity provision 6. Brings forward space for community and healthcare uses, the intent being to offer some targeted and customisable ground floor space to the hospital for use as a clinic/ imaging centre, in preference to generic office space for which there is a current and recognised lack of demand in the town centre, as the proposed changes to Policy EM1 identify. 7. Puts active uses and frontages around the site, offering opportunity for other local residents to take advantage of new amenities <p>The proposals have been progressed in a manner that reflects the on-site situation; Sapphire Plaza’s tenant is due to leave in 2024 and any future occupancy would be on a year by year contract basis. Royal Court’s leasehold is fairly dilapidated, with long-term vacancy of the non-residential space and the architecture which offers little by way of local benefit.</p> <p>Whole Site Regeneration It is proposed to redevelop the whole site, including Sapphire Plaza and Royal Court. It does not make good planning or commercial sense to retain Royal Court, given the cost of substantially remediating Royal Court by its leaseholders themselves or separately substantially refurbishing through redevelopment at Sapphire Plaza only. The potential improvement realisable through site-wide change is significantly greater than the one third of the site available for redevelopment of Sapphire Plaza only, which is constrained by the shared car park between sites, and allows for many more development driven benefits to be realised, in particular:</p> <ol style="list-style-type: none"> 1. The potential for geothermal heating and cooling, which would substantially reduce the energy costs of incumbents 2. The opportunity to provide community and healthcare uses in the locality 3. The space to create a meaningful co-living destination and to deliver a significantly increased quantum of housing on an island location, rather than having this substantially constrained by existing development 4. The ability to use space to create usable, high-quality open, play and planted spaces within the entire footprint versus that associated with Sapphire Plaza’s constrained geography, which is restricted by the shared car park <p>Combating loss of employment In terms of Sapphire Plaza, the site has previously benefitted from Prior Approval to enable conversion of the property to 85 residential homes. Whilst this has fallen away, the due diligence submitted as part of this process identified that the development was suitable in terms of highways, noise and land contamination issues. Further, submissions at the time identified issues, as seen widely across Reading, with demand for sub-prime Office accommodation. As such, change is required to bring the site into more productive use. It is proposed to create new employment floorspace within the site, which will offset that lost.</p> <p>Protecting existing residents</p>	<p>buildings and to the waterway. Building at considerable height is also unlikely to be suitable due to the proximity of heritage assets. However, as included in the Local Plan, these are indicative capacities rather than policy maxima.</p> <p>In terms of Royal Court, the Council does not consider that the likely capacity would represent a substantial uplift over the existing building, meaning that it is not considered appropriate to include within the allocation.</p>
--	---	---

	<p>It is also understood that the Council would wish to ensure that existing residents at Royal Court are protected from displacement on any whole site development. In this regard, conversations offering opportunity to take space in the new development would take place. In terms of phasing, Sapphire Plaza could be built first, allowing for decanting direct from one property to the other without the need for interim accommodation. Residents of the new development would benefit from accommodation meeting 21st century needs, with this providing access to amenity areas and community uses on-site and benefitting from renewable energy generation and associated lower costs.</p> <p>Proposed Accommodation As identified in drawing no.452-ACG-XX-XX-DR-A-12100, the proposed scheme comprises Build to Rent (BTR) and Co-living accommodation. In this manner, a scheme of 321 dwellings is proposed, alongside 725m2 (NIA) of non-residential uses. Within the residential accommodation, a tenure-blind scheme would come forward to provide affordable housing in line with policy expectations.</p> <p>The ground floor plan identifies how it is intended to locate residential and non-residential uses alongside intervening spaces. It is considered that the approach will maximise activity and surveillance around the site, which is one of the current disadvantages with the layout of buildings and spaces. In this regard consideration is also being given to linking the site directly to the Public Open Space opposite and the Council's views are therefore welcomed.</p> <p>It is currently proposed to provide a split of accommodation, with BTR and Co-living currently favoured. The buildings, however, can be developed in a number of ways, including traditional Private for Sale and Affordable Housing, full BTR or full Co-living.</p> <p>The dual-accommodation BTR/Co-living scheme is proposed for the reasons highlighted above, particularly the benefit that could be afforded to key workers from Royal Berkshire Hospital and those on lower incomes with a desire to live close to Reading's town centre. Therefore the client welcomes discussions with the Council to enable further certainty of this matter ahead of any Regulation 19 submission in support of the site.</p> <p>Given uncertainty regarding the final mix of residential accommodation proposed, it is advisable to retain the indicative range of 250 – 400 units previously mooted.</p> <p>Geothermal Heating and Cooling It is proposed to provide basement parking within the scheme. This will help provide an element of car parking at the location, but more importantly, will allow the relevant building depth to take advantage of geothermal heating and cooling. It is proposed to provide all spaces with EV charging. The structural and technical detail of this element of the proposals remains to be developed, but the submitted materials help to identify the principles of this.</p> <p>It is considered that provision of geothermal heating and cooling provides a significant benefit and case study example for others to use, with this approach very much according with the Council's ambitions in terms of combating climate change and moving towards net zero.</p> <p>Considerations regarding the amount of car parking for the residential and non-residential uses remain open to discussion, with the location of the site warranting a significantly-reduced or car-free scheme. Should this be the Council's preference, the basement space can be re-used or partly re-used as an EV charging facility for cars visiting the town or storage, community or healthcare uses as considered relevant to the location. Discussions with the Council and NHS will be sought in terms of identifying potential and preferable uses for the basement</p>	
--	--	--

	<p>space that will be created, should the Council wish to see geothermal heating and cooling come forward on site in line with stated environmental ambitions.</p> <p>Further to assessment of the site and the proposed development, Ground Source Consult Ltd have summarised that there are no obvious barriers to drilling such as source protection zones or sites of special scientific interest which may require an onerous permitting process.</p> <p>In terms of heat pumps, there are a couple of options; first is a centralized system to distribute domestic hot water and low temperature hot water through the building. The alternative is a shared ground loop which distributes ground energy to each space, with each space having its own heat pump. The advantage of the second type of system is that each owner or occupier of the space pays for the heat they use, they can set their temperatures to what they want, which generally increases efficiency.</p> <p>Assuming a c.30 W/m2 for peak load for a high specification building of the type proposed the system will be developed at 900 kW, a comparison of which below shows estimated CO2 savings against mains gas. The client welcomes the opportunity to discuss the potential for geothermal heating and cooling on this site with the Council's Sustainability Team</p> <p>Tall Buildings Whilst there are currently no proposed changes to Policy CR10, Tall Buildings, it is considered that a small extension to the eastern grouping to accommodate all or part of Site Cen9 is warranted. The rationale for this is as follows:</p> <ul style="list-style-type: none"> • The site is located directly adjacent to the 'Verto' on Kings Road and the Prudential Buildings, which represent the current extent of the Tall Buildings: Eastern Grouping • The island site is bordered on all sides by the local highway network, which combined with site size, provides the necessary separation and opportunity to optimise densities and better deliver upon the challenging quantum, mix and tenure requirements set out in the LPU • The site is adjacent to 10 storey development to the south at Q2 and implemented 9 storey development at Clarendon House to the east, ref: 180909, providing further rationale for height in the intervening area between these buildings and the Tall Buildings zone. • Detailed HTVIA and Daylight and Sunlight Assessment has identified appropriate built form parameters for development on site, enabling more height to come forward without unacceptable impact on the surrounding locality. • The whole-site proposals will help to realise substantial other benefits, as listed above in respect of delivery of more affordable accommodation, opportunity to bring forward healthcare and community uses on site, geothermal heating and cooling and substantial urban greening and visual uplift. <p>More detail in support of our proposals to review Policy CR10: Tall Buildings is set out in the HTVIA that supplements this submission</p> <p>Heritage, Townscape and Visual Impact Assessment (HTVIA) Montagu Evans has undertaken a comprehensive HTVIA to support this stage of the proposals. In respect of the detailed work undertaken, necessary updates to the minimum densities policies as well as Policy CR10 (Tall Buildings) of Reading's Local Plan are identified and it is concluded that it is clear that a scheme of up to 17 storeys would be suitable on Site Cen9: Sapphire Plaza, given the emerging residential character of this part of Reading.</p>	
--	--	--

		<p>Daylight and Sunlight Point2 has considered daylight and sunlight impact on surrounding properties as a consequence of the proposals.</p> <p>The location of the site, which is separated on all sides by the local highway network and is situated to the north of the nearest neighbouring building, benefits this process immeasurably and enables the proposed built form to come forward in high compliance with BRE guidance. Point 2 conclude on this basis that ‘...all properties will retain good daylight levels and...that the proposal relates well with the existing residential context in terms of daylight amenity’, as well as ‘in terms of sunlight amenity, the APSH analysis confirms that a majority of the surrounding receptors orientated within 90 degrees of due south are not noticeably impacted by the proposal. The few impacts present occur primarily as a result of low existing sunlight due to self-obstruction’.</p> <p>Highways and Access Stantec has reviewed the site to consider trip generation, access, servicing requirements and car parking standards. It is concluded further to this assessment that the site is situated in a highly sustainable location with direct access to the pedestrian/cycle network and public transport connections.</p> <p>The principle of access from Kennet Street is currently shown by the existing operation of Sapphire Plaza and Royal Court. This will continue with the redevelopment proposals while improving pedestrian and cycle access to the site.</p> <p>It is considered that the principle of residential-led development meets the transport tests for developments set out in the NPPF (Paragraphs 114–117). The site redevelopment is considered acceptable from a transport and traffic perspective.</p> <p>Please see attached reports/technical notes and/or the full representation for a summary of their contents.</p>	
Savills (OBO John Lewis Partnership)	N/A	<p>The identification of the John Lewis depot at Mill Lane (Cen3) as a proposed site allocation for around 200 build-to-rent dwellings reflects our previous Call for Sites submission and is fully supported.</p> <p>The Site is in a sustainable location on the edge of the town centre in Central Reading, within close proximity of key local services and facilities within the town centre. The use of the existing building has become surplus to JLP’s requirements, with its functions having been transferred to the John Lewis department store at Broad Street, Reading or to its Distribution Centre in Bracknell. The Site is therefore suitable and available for redevelopment.</p> <p>The adopted Reading Local Plan (2019) (Policy CR14g) allocates the Site, together with land opposite across the A329, for public car parking to support an additional 1,600-2,000sqm of retail or town centre uses at The Oracle Shopping Centre. However, in light of recent major changes in the retail sector and reduced demand for additional retail floorspace (and additional car parking) the allocation has not been delivered as the Council previously envisaged. Hammerson (owners of The Oracle) have confirmed to JLP that they do not have any intentions to implement the existing allocation for additional retail provision and that they do not therefore require the use of the Site for car parking. Indeed, Hammerson submitted planning applications (refs. 221916 and 221917) for proposed residential development at The Oracle (including part of the Local Plan allocation) in December 2022 and confirmed that <i>‘there is not considered to be the need to provide additional retail floorspace at The Oracle as per the allocation under Policy CR14(g)’</i> (Planning Statement, paragraph 7.29). It is clear therefore that Hammerson do not intend to provide any additional retail floorspace at The Oracle, nor based on this any car parking at the Site, as envisaged by Policy CR14g. This is also acknowledged in the LPPU</p>	<p>Noted. The allocation CR14g is proposed to be replaced by a mainly residential allocation at the Oracle Riverside East, and the Mill Lane site included as a new allocation, CR14r. The Council considers that the capacity is lower than in the submission, albeit that this is an indicative capacity for monitoring purposes. There is no need to specifically allocate the site for Build-to-rent, as this is not necessary to make development acceptable.</p>

		<p>consultation document (Appendix 2) which states that <i>‘there are no indications that it will be implemented, and the context for new retail has changed substantially in recent years.’</i></p> <p>Instead, as a result of the closure of the existing warehouse building, JLP are seeking to progress proposals for the redevelopment of the Site to accommodate one of its first flagship residential Build to Rent schemes. In this context the Site presents an exciting opportunity for Reading borough, as well as JLP, to deliver a scheme of Build to Rent units that meets market demand, helps to address increasing local market and affordable housing needs (as identified in the LPPU consultation document (November 2023)) and which will make a positive and lasting contribution to Reading town centre from both a social, environmental and economic perspective. The current proposals seek to provide approximately 200 Build to Rent residential units (including affordable housing and a mix of unit sizes including studios and 1, 2 and 3-beds) together with landscaping, amenity space, cycle parking and disable car parking. The proposals incorporate a medium to high density of development appropriate to its town centre location, maximising the efficient use of a brownfield site and ensuring a high quality of development and tangible social benefits.</p> <p>JLP has entered into a Planning Performance Agreement (dated August 2023) with RBC and has undertaken positive pre-application engagement with officers, members and the local community to help inform the design of the current proposals. Alongside this, detailed technical and environmental assessment work has been undertaken which confirms that there are no constraints or other technical reasons which would affect delivery of the site for the proposed development. A full planning application for Build to Rent development is now being prepared and is anticipated for submission in spring 2024.</p> <p>On this basis, the allocation of the John Lewis depot at Mill Lane (Cen3) for around 200 build-to-rent dwellings is fully supported.</p>	
Jo Prune	N/A	<p>Gen 2 -I oppose the relocation of the Central Library and the building of flats on the site. This is an important local resource in a good location at present. It should remain where it is and more town centre flats should be located elsewhere.</p> <p>Gen 7 -I oppose the building of flats in the Tesco Napier Road car park. This is adjacent to the Thames Path and this area should not be built up. The flats should be located elsewhere.</p>	<p>The decision to relocate the Central Library has been made and planning permission granted, and the current site will be surplus. The site is an appropriate location for residential development.</p> <p>Whilst the Napier Road site is adjacent to the Thames Path, it is a brownfield site that is surplus to requirements and is a suitable location for residential development within certain parameters.</p>
The Woodland Trust	N/A	<p>We note the existing trees, including trees subject to TPOs, on the Mill Lane, Richfield Avenue, George Street, Napier Road, and Kings Road sites, and recommend their retention be specified.</p>	<p>Agreed. The relevant allocations should be drafted to ensure that important trees are retained.</p>

Additional representations submitted via email regarding additional allocations to policy CR14

Respondent name	Comments	RBC Officer Response
Reading Rep Theatre	<p>Regarding Reading College Site (CEN10) I am writing to express our deep concern and challenge the recent submission of this site as part of the LPPU. Reading Rep Theatre sits on this site and any redevelopment would adversely affect our charitable activities and as such the well being of the community that we serve.</p> <p>Reading Rep Theatre has existed for twelve years but the theatre building was completed just three years ago and has become the home of Reading Rep’s productions and education and outreach work. The theatre itself was the result of a</p>	<p>Change proposed. The Reading Rep Theatre site should be excluded from any proposed allocation, and any development should be conditional on retaining adequate parking and servicing access for the theatre.</p>

	<p>million pound fundraising effort and has transformed the reach and impact of the charity. Reading Rep Theatre reaches 23,000 people a year and works to break down the barriers of accessing high quality culture and cultural education. We are the largest and most impactful independent arts organisation in the town.</p> <p>We appreciate the Planning Department's dedication to responsible and thoughtful urban development. Our goal is to ensure that the redevelopment does not compromise the mission and services of our charity.</p> <p>There are a number of concerns the inclusion of this site on the partial plan creates for us:</p> <ul style="list-style-type: none"> - Reading Rep, as a lease condition, shares the use of the Reading College car park. Should the full site be redeveloped then no parking would be available. It would also massively reduce the parking available to users of Reading College. - It is likely that construction work on any scale would impact the ability of the theatre and learning studios to operate at full capacity. - Reading Rep's lease renewal would be complicated by redevelopment of the site. Jeopardising our future and potentially making us homeless in the next five years. - The inclusion of our site on the Partial Plan creates a barrier to accessing capital funding. Funders will not look favourably of their investment being a risk in the short or medium term. - It has already had a detrimental impact on our staff team and participants, believing that the future of the organisation is at risk. 	
<p>Katesgrove Community Association</p>	<p>Regarding John Lewis Depot CEN3 This site is adjacent to the conservation area, as well as listed buildings on London Street. It is within an area of archaeological potential. The proximity of the Inner Distribution Road flyover creates noise and air quality issues. Existing trees and hedgerows, particularly along Mill Lane are important and must be retained. Any development at height is likely to result in overlooking of the cemetery/garden at the Reading Friends Meeting House and possibly the shared garden at Townsend House too.</p> <p>This site (CR14g) is allocated for an extension to the Oracle involving retail floorspace to the north of this site and relocation of the car park onto this site. But there are no indications that it will be implemented, the context for new retail has changed substantially in recent years.</p> <p>KCA would support Option 3. A residential use would be very appropriate BUT it needs to be sensitively designed not to dominate or overlook the Friends Meeting House Garden and other residential and listed properties. It needs to present an interesting face to the IDR and not create a canyon with a hostile micro climate for pedestrians and local residents. Also, to display sensitivity to the Black History mural and that site when redeveloped. And to retain and enhance planting around the site.</p>	<p>Noted. The site is proposed as a residential development, albeit the Council considers that the capacity is lower than in the submission, albeit that this is an indicative capacity for monitoring purposes.</p>
<p>ICB</p>	<p>The ICB has no particular concern about the proposed removal to some of the sites from the policy to reflect the latest developments of those sites.</p> <p>Given that the uses and the scale of development are only indicative at this stage, the ICB has no particular concern to the sites identified from the call for sites exercises. Notwithstanding, the ICB considers that those new identified sites will inevitably have additional pressure to the existing primary healthcare provision.</p> <p>The existing supporting paragraph 5.4.36 to Policy CR14 generally sets out that some sites identified for housing may have the potential for community uses including healthcare facility. The ICB considers that the wording of the supporting paragraph is not precise. If the Council is intending to introduce community uses including primary healthcare facilities to some of the sites, the Council should liaise with the relevant providers at a minimum to work out the most appropriate way to place those uses which can be operationally and financially viable.</p> <p>The situation is more complicated in primary healthcare provision as GP practices are privately owned. If the Council is intending to accept the ICB's suggestion as above, the ICB is happy to work with the Council, site promoters and GP</p>	<p>No change proposed. It is not clear which site is intended to be subject to the change, and matters such as mitigating infrastructure impacts unless there are sites specific needs are more appropriately dealt with by a general policy rather than individually from site to site.</p>

	<p>representatives to explore the opportunities for such provisions. The ICB also of the facility. The findings of the studies can help inform the wording of this Policy, including whether an onsite primary healthcare provision can be identified, or an offsite mitigation measure should be provided.</p> <p>The ICB has the following recommendation on the wording of Policy CR14: <i>CR14: Other Sites for Development in Central Reading</i> <i>The following sites will be developed according with the principles set out in this policy:</i></p> <p>Broad Street Mall: <i>The redevelopment of Broad Street Mall to include residential development should include the re-provision of the existing Health Facility at either ground or first floor level (accessible by lift and escalator if on the first floor but otherwise easily accessible to the public) to an equivalent size and to an agreed layout and specification with BOB ICB, at nil capital/rental cost to the ICB/its nominated service providers for a period not less than 40 years. This re-provision extends to not only a permanent facility, but also a temporary facility, if the current facility needs to be vacated in order to facilitate the wider redevelopment of Broad Street Mall.</i></p> <p>General principles for all sites including residential use. Development should:</p> <ul style="list-style-type: none"> • Address the impacts on the existing infrastructural capacity including primary healthcare provision and provide health estates mitigation at nil capital/rental cost to the ICB. <p>The ICB also has the following recommendation on the wording of supporting paragraph 5.4.36 to Policy CR14: The Council should work with relevant infrastructural providers and all developers to identify the onsite provision of community uses, including healthcare or education. Other offsite mitigation measures should be provided where appropriate if onsite delivery is not financially or operationally viable.</p>	
<p>Tony Carr</p>	<p>CEN4 – Crown Plaza: There are footway/cycle routes around the boundary of the site, including the Thames path and routes that would be used by pupils travelling to the new River Academy. The existing paths are relatively narrow and if the site were to be developed, the paths should be improved to make them more useable and attractive for existing and future users.</p> <p>CEN5 - Norman Place: Access to Reading town centre, railway station and other destinations from Caversham via Christchurch bridge is a key traffic-free route in the Reading walking and cycling network. Opportunities for a high quality route immediately south of Christchurch Bridge have not been achieved as part of the SSE site development, but the existing route runs around the Norman Place site. If the site were to be developed, a high quality direct walking and cycling route should be provided as part of any development scheme.</p> <p>CEN6 – Reading Bridge House The northern edge of the site adjoins the Thames path footway/cycleway, which also forms part of National Cycle Network route 5. The route is relatively narrow at this point and provision should be made to widen the path as part of any development scheme.</p> <p>SOU4 – Site at Green Park Village Reading Green Park station has opened with a cycle route around the car park but no safe cycling route to link to other traffic-free cycle routes in the Green Park area. Therefore, any development in the area should make provision for or fund a safe cycle route to fill the missing link in the network.</p>	<p>Noted.</p> <p>Re Crowne Plaza, this is not proposed to be included as a development allocation.</p> <p>Re Norman Place, the appropriate location for the pedestrian cycle link is directly from the bridge via the 55 Vastern Road site. A link has been achieved in the relevant permission, which is now about to be implemented. Whilst the existing public access adjacent to Norman Place should be safeguarded, it is not considered that this should be the primary link.</p> <p>Re Reading Bridge House, the policy criteria would include the need to enhance the footway where possible,</p> <p>Re Green Park Village, this is not proposed to be included as a development allocation.</p>

<p>MRPP (OBO Samuel Smith Old Brewery)</p>	<p>In terms of the opportunities for housing within the town centre, our client owns the site at 20-22 Duke Street on which is located a former public house which has remained vacant for a significant number of years. The site is located adjacent to the river Kennett and is situated on a corner plot which is also adjacent to High Bridge. The surrounding area comprises residential, retail, leisure and office uses.</p> <p>As part of the Scope and Content document, the Council have identified a number of sites which could be taken forward as allocations within the Local Plan. Whilst a number of these are located within the town centre, the site at 20-22 Duke Street also offers a site within the town centre which can provide additional housing units within a sustainable location.</p> <p>The site could deliver circa 30 units which is not within the same scale as other sites which have been put forward (with those sites nominated as achieving between 70 and 400 units). With this in mind, the site at Duke Street thus offers the potential to deliver much needed town centre housing but in the shorter term given the size of the site and the number of units to be delivered. Thus, with respect of Q68, the Duke Street site is identified as another additional allocation to be added to Policy CR14 'Other sites for development in Central Reading'.</p> <p>Whilst not only contributing to housing numbers, the allocation of 20-22 Duke Street for housing also offers a number of other significant benefits, delivering high quality residential development in the town centre, within an extremely sustainable location and a mixed-use area whereby residential development is an appropriate use and whilst also providing the opportunity for improved pedestrian connectivity along the river. This will provide an enhancement to the character and appearance of the area and ensures that new housing development is making efficient use of scarce urban land.</p> <p>The Council in their Scope and Content document have put forward a requirement of 800 new homes per year. The Council identify that there needs to be an even stronger focus on Central Reading if they are going to deliver housing to meet needs, it is thus essential that other developable, deliverable sites are allocated for housing in order to meet these needs. It will be crucial to ensure that delivery of these housing numbers can take place on sustainable sites such as 20-22 Duke Street.</p>	<p>Change proposed. It is agreed that this site should be included as an allocation in the plan, although it is considered that the existing building should be retained and converted, with potential for an extension.</p>
<p>Opus Works (OBO AEW and McLaren (Broad Street Mall))</p>	<p>Broad Street Mall (BSM) constitutes a previously-developed (brownfield) site situated in a highly accessible and well-connected area of Reading within the built urban form of the town. In these respects, proposed development at BSM, which is allocated within the Local Plan and is currently subject to advanced pre-application discussions with Reading Borough Council (the Council) accords with stated objectives to deliver growth in sustainable locations which are, or can be, well-served by existing infrastructure and services.</p> <p>BSM therefore represents a sustainable site allocation and will make a valuable contribution towards helping the Council meet its challenging housing targets (of all tenures and sizes) during the forthcoming Plan period. The partial redevelopment of BSM for a residential-led scheme will also deliver much-needed economic boost to the Council through Community Infrastructure Levy (CIL) contributions and facilitate urban regeneration through drawing in more activity to the town aiding the town's economy and prosperity.</p> <p>Opus Works and its client are resolute in the belief that BSM is suitable, achievable and deliverable and intends to promote this site through the forthcoming Update to the Local Plan in order to bring the site allocation in line with proposed changes to built form, which in themselves respond to updated legislation and the direction of planning policy.</p>	<p>Noted. This existing allocation is retained in the Local Plan Partial Update.</p>
<p>CADRA</p>	<p>Regarding 2 Norman Place (Cen5) exhibition:</p> <ol style="list-style-type: none"> 1. We were disappointed that so little consideration had been given to retaining the existing building, avoiding demolition and addressing the issues of embodied carbon. 2. We oppose any overshadowing of the river on grounds of both biodiversity and appearance. We are concerned that the riverside block by Clearwater Court is taller. 	<p>Noted. These comments relate to current proposals on the site. It is considered that the site is capable of accommodating a development which generally addresses these concerns within the proposed allocation.</p>

	<ol style="list-style-type: none"> 3. The exhibition fails to show the street scene on Vastern Road which will be completely changed by the proposals. The current frontage is green with the buildings set well back from the road. The proposal seems to bring the new building up to the back of footpath, which would be a loss of amenity to this heavily used road. 4. More details are needed of the "Significantly enhanced pedestrian and cycle route through to the river" and how this would related to the consented scheme on the SSE site. 5. There is no analysis of the impact on views between Reading and Caversham. 6. This site has much better access to open space than any of the other central sites. It should therefore be offering much needed family accommodation for which there is considerable unmet need. While there may be commercial demand for one and two bed properties, that does not meet the local need. 7. Enhancements to the riverside and better public access are, in principle, very welcome. To be successful and create a real change to the riverfront, they should provide more than a token outdoor cafe. An indoor facility with outdoor seating is needed. 8. With low levels of car ownership, many residents will rely heavily on taxis and deliveries. It is critical that suitable areas for taxis and delivery vehicles to pull up are provided. We see the absence of this in other developments where drivers pull up on the pavement, blocking pedestrians. It should not be left to Police and the Council take enforcement. 9. Storage facilities on site are important for residents and we hope this will be provided. Storage rental elsewhere is likely to be increasingly distant and is problematic without a car. 	
<p>Lichfields (OBO USS Investment Management Ltd)</p>	<p>Regarding Site Cen1 – Aquis House and 33 Blagrove Street</p> <p>The site represents a suitable location to optimise density and provide a 'Tall Building' to contribute towards Reading's development needs.</p> <p>As summarised above the site occupies an exceptionally accessible location right opposite Reading's Railway station. It is also in immediate proximity to the Station Area Tall Building Cluster (RBLP Policy CR10).</p> <p>Whilst dated, the Reading Station Area Framework also notes that "<i>tall buildings and high density developments are an integral part of the vision for central Reading</i>" (para. 6.6). It is clear that previous strategies relating to tall buildings have sought to deliver the highest density development within Central Reading, including a particular focus on the area surrounding Reading Railway Station. Redevelopment of the site comprising a Tall Building would represent a logical extension of the existing Tall Building Cluster, and be consistent with part of the site originally being identified as a "<i>Preferred Tall Building Location</i>" (TBS, 2008, page 39) within the previous TBS (albeit not progressed within subsequent Local Plans).</p> <p>The site does not comprise any statutory listed building within its boundary nor is immediately adjoining any. Part of the site (33 Blagrove Street) is located within the edge of the Market Place/London Street Conservation Area and the Abbey Quarter, but the building itself is not identified as a building of townscape merit in the Conservation Area Appraisal.</p> <p>No. 33 Blagrove Street lies within the Abbey Quarter as designated by the adopted local plan policy CR15, but Aquis House and its rear parking court are outside of this designation. Policy CR15 states "<i>Development in the vicinity should promote the architectural, archaeological or historic interest of the Abbey and its setting</i>". The feasibility work being undertaken will be underpinned by heritage and townscape assessment. Early analysis highlights there is an opportunity for the site to deliver landmark architectural design and quality, with public realm improvements within proximity of the Abbey Quarter, while promoting sustainable modes of transport, all of which is consistent with policy CR15.</p> <p>Comments on LPPU development options The SA concluded that option CEN1(i) (Redevelop offices for mixed residential and office development of 10-15 storeys) and CEN1(iii) (Redevelopment for mixed use residential and office at below Tall Building threshold (12 storeys) "<i>have the same number of positive and negative effects. A decision on which option should be carried forward would be better assessed</i>"</p>	<p>Noted.</p> <p>The sites are proposed to be included as an allocation for development including for residential and employments, albeit they would be split in two given that they are distinct sites fronting streets of different character.</p> <p>Regarding a tall building, Aquis House immediately adjoins a conservation area and 33 Blagrove Street is within one, and both are in close proximity to a number of listed buildings. It is considered highly unlikely that the sites will be suitable for significant increase in height over the existing buildings. Nevertheless, the proposed allocations do not place any specific limits on height, with this needing to be decided through the development management process.</p>

<p><i>once there is greater detail on how many housing numbers each option could deliver, as well as proposed design.” (SA, p. 156)</i></p> <p>Our client considers the site is suitable for redevelopment, for a range of town centre uses which could comprise mixed residential / office use or potentially solely residential use, within a building in excess of 12 storeys high, subject to detailed design. Appropriate forms of residential development, in addition to market and affordable housing, could include Build to Rent, Collective Living, Student Housing and / or Elderly Persons housing and appropriate flexibility should be maintained at this stage.</p> <p>We outline the below high-level analysis relating to the development options for the site consulted on within the LPPU.</p> <p>(a) Nominator suggested Option: Redevelopment of offices for mixed residential and office development of 10-15 storeys (Option CEN1(i) in the SA)</p> <p>Not surprisingly this option is expected to deliver the highest quantum of development through a Tall Building. It is expected to have the potential to make the greatest contribution towards meeting RBC’s increasing housing needs (both market and affordable housing) in a highly accessible location. There will also be potential for the development to deliver other benefits, including but not limited to enhancements to public realm, the historic environment and other community benefits. Our client concurs with the development’s potential benefits summarised within the SA as follows (recognising that the benefits would vary depending on the form of development ultimately proposed):</p> <ul style="list-style-type: none"> • <i>“ensure the long-term longevity of the site”</i> • <i>“significant positive impacts on undeveloped land”</i> • <i>“significant positive effects on encouraging sustainable travel given its proximity to nearby transport links”</i> • <i>“significant positive effects on meeting housing needs”</i> • <i>“significant positives would still be felt in terms of economic employment as office development would still be retained at the site”</i> • <i>“A mixed-use development that is within a prime town centre location may result in benefits to well-being and health” (SA, p.155-156)</i> <p>We note the SA considers the positive and negative effects of this development option would be equal to development option 2 which would not exceed 11 storeys high. Our clients emerging feasibility analysis indicates a taller building has potential to make a greater contribution towards RBC’s housing need. This feasibility analysis is anticipated to conclude that this development option would result in greater potential than option 2 (as per Appendix 2 in the LPPU) when assessed against the SA objectives.</p> <p>(b) Redevelopment for mixed use residential and office at below tall building threshold (12 storeys) (Potential alternative option 2 in the LPPU Appendix 2 (p.112); Option CEN1(iii) in the SA)</p> <p>Our client concurs that this development option would lead to a number of positive effects although considers that it misses an opportunity to make the most effective and efficient use of the site, optimising its density in line with its exceptional location.</p> <p>(c) Redevelopment or change of use of 33 Blagrave Street only (Potential alternative option 3 in the LPPU Appendix 2 (p. 112))</p> <p>33 Blagrave Street occupies a smaller portion of site area. It is considered the most cohesive development could be achieved when assessing proposals for both site’s comprehensively. As such a comprehensive allocation covering both site areas is preferable.</p>	
---	--

	<p>(d) Redevelopment or change of use of Aquis House only (Potential alternative option 4 in the LPPU Appendix 2 (p. 112))</p> <p>Aquis House occupies a smaller portion of site area although includes a greater proportion of undeveloped land (e.g. the existing car park etc). Consistent with our comments above it is considered the most cohesive development could be achieved when assessing proposals for both site's comprehensively. As such a comprehensive allocation covering both site areas is preferable.</p> <p>(e) Do not allocate (Potential alternative option 1 in the LPPU Appendix 2 (p. 112))</p> <p>The site will be available in the short to medium term, is appropriate for development and could make an important contribution towards RBC development needs. Whilst the sites location and national and current development plan policy would enable the comprehensive development of the site, our clients consider that a failure to allocate the site would be a missed opportunity which is contrary to the provisions of the NPPF (see paragraph 124d).</p>	
<p>Lichfields (OBO Packaged Living)</p>	<p>Site Cen5: 2 Norman Place</p> <p>Since acquisition of the site, Packaged Living have entered into detailed pre application discussions with the Council about the opportunity to redevelop the site to provide a major Build to Rent development including new high quality waterside public realm. These discussions have been supported by various detailed assessments of the site, which provide a more informed basis for assessing the site's potential for redevelopment, than that submitted with the previous call for site's exercise.</p> <p>Loss of employment use The LPPU does not seek to review policy EM3 so it remains the basis for considering the loss of the existing employment floorspace at the site notwithstanding that the LPPU recognises (para 7.4) that whilst the current local plan (EM1) identified a need for a net gain of between 53,000 and 112,000 sq m of office floorspace, since the policy was adopted office space has reduced by around 74,000 sq m.</p> <p>A Market Overview has been prepared by Hollis Hockley and submitted to RBC separately to provide analysis of the relevant consideration of policy EM3 as part of the preapplication engagement with the Council. It identifies that the overall demand for office accommodation is c. 30% down across the South East on the long term average. With the shrinking demand for office space, there is an oversupply in office accommodation in Reading. The vacancy rate in Greater Reading currently stands at 16.8% (i.e. just over 2,000,000 sq ft) which is stated to be the highest since 2002-2004 following the dot.com crash, and is expected to increase to c. 19% in 2024 following the completion of Station Hill. The vacancy rate is significantly higher than the historic long term average vacancy rate of 9% within the South East market over the last 10- 15 years.</p> <p>The Market Overview notes that the commercial core in Reading town centre is centred around the area south of Reading Station which is the prime location for office accommodation. The importance of the commercial core as the location for office space in Reading will be further bolstered with the completion of Station Hill where a considerable amount of high-quality office space will be delivered.</p> <p>While Norman Place is close to Reading Station, the Market Overview explains that its location to the north of the railway line is considered as sub-optimal for employment use for it is being on the "<i>wrong side of the tracks</i>". With an oversupply in office accommodation in Reading where over 90% of the office space currently on the market in the town centre is Grade A, it is highly challenging for Norman Place, a Grade C office accommodation, to compete with Grade A office space within the commercial core. This is illustrated by the absence of leasing transactions for Grade C space in Reading town centre over the last five years as occupiers move towards better suited, sustainable space.</p>	<p>Noted. The site is proposed as a residential development, albeit the Council considers that the capacity is lower than in the submission, with the caveat that this is an indicative capacity for monitoring purposes.</p>

	<p>The Market Overview indicates that it will not be viable or necessary for Norman Place to remain in employment use, and that its redevelopment to residential use would not have an unduly adverse impact on the supply of employment floorspace.</p> <p>Flood Risk Stantec has produced a Flood Mitigation Strategy (submitted separately to RBC during the pre application process) to provide an overview of the site's flood risk classification, and the opportunities that might exist to reduce the site's flood risk.</p> <p>Detailed assessment of the site carried out has concluded that the majority of the site lies within Flood Zone 1. The emerging designs of any redevelopment could accommodate all proposed building footprints within Flood Zone 1 where there is low probability of flooding.</p> <p>The strategy identifies that the patio over the northern end of the site lies partly in Flood Zone 2 and partly within the reference 1 in 100 annual probability +35% climate change allowance flood extent. As such, any redevelopment proposal could avoid built form being located in this part of the site, whilst providing opportunities for improvement in floodplain storage capacity over the site.</p> <p>Any surface water drainage strategy for the scheme will incorporate a range of Sustainable Drainage Systems (SuDS) to manage surface water, improve water quality and reduce peak runoff rates from the site.</p> <p>The strategy concludes that the redevelopment of the site is unlikely to be significantly constrained due to the wider flood risk to the area, and there is an opportunity for a redevelopment to reduce flood risk through measures including additional floodplain storage capacity and sustainable drainage measures.</p> <p>Affordable Housing Packaged Living seeks to deliver progressive levels of affordable housing relative to comparable developments, and subject to viability. In the context of the development options under consideration within the LPPU Reg. 18 consultation, delivering a higher number of overall housing units at the site will provide greater opportunity for delivery of proportionately higher numbers of affordable housing.</p> <p>Massing and Visual Impact considerations The site and surrounding area was predominantly redeveloped in the 20th century and comprises a mix of office, retail warehouses, residential buildings and car parks. The built form is characterised by large urban blocks and medium to large footprint buildings with variable definition to Vastern Road. Buildings predominantly date from the 20th century with considerable variety in their siting, height, massing and architectural style that results in a lack of coherence. The taller building forms include Thames Quarter (11-23 storeys) and Reading Bridge House (11 storeys) fit comfortably with the wider context of tall commercial buildings along Forbury Road (this wider context is illustrated within appendix 1). The townscape is unexceptional and, as noted below, is well separated from surrounding heritage assets. It is a robust townscape with low sensitivity to the introduction of taller and more intensive building forms (as recognised in Reading's Tall Building Strategy, and 2018 update).</p> <p>The existing nondescript 1990's office building lacks distinctiveness and the prominent car parking on Vastern Road detracts from this frontage. A significant opportunity to enhance townscape character through a taller, residential-led mixed use redevelopment exists, including though:</p> <ul style="list-style-type: none"> • Placing buildings to repair the frontage to Vastern Road and positively redefine the street with an active frontage, • Reinforcing the connection to the River through frontage development, • Providing an attractive building that mediates the transition in scale between the river and the town centre and • Creating an opportunity for public space and additional activity along the Thames. 	
--	---	--

	<p>The surrounding townscape character is robust and varied in the scale, form and use of buildings. There is the scope within the site to provide a transition in scale stepping up from the river towards the town centre and the emerging cluster of tall buildings which are starting to form a backdrop to the site in views from the north. Our initial analysis has demonstrated that the site could accommodate a marked increase in the height and massing of development compared to the existing situation and the number of units currently envisaged without any adverse effects on townscape character or visual amenity.</p> <p>Heritage The existing site context has limited heritage designations or historic character with much of the surroundings (which historically were predominantly railway sidings and industrial buildings) having been comprehensively cleared during the 20th-century. The surrounding context is now characterised by large 20th-century detached buildings of various scale and character with a loose grain. Some historic fragments survive: a small (locally listed) two storey red-brick building corner west of the site, likely built in the early 1900s; the original main station building south-west of the site (1865-67, Grade II), and the Kings Meadow Swimming Pool (Reading Lido) (Grade II) to the east of the site. Whilst these two listed buildings are in close proximity to the site, neither are directly adjacent, and their historic settings have been significantly altered by 20th-century development. The locally listed Reading Bridge is also close to the site although views of/ from the bridge are already characterised by the large-scale 20th-century buildings.</p> <p>South of the railway is a high concentration of listed buildings within the town centre as well as Forbury Gardens (Registered Park and Garden) and Reading Abbey Scheduled Monument. The northernmost parts of Market Place/London Street Conservation Area are also within this wider proximity of the site. However, due to the visual and sensory buffer of the railway line, and the distance, these assets do not form an immediate part of the site's setting.</p> <p>The site is well separated from designated heritage assets. Taller elements of any redevelopment proposal may be glimpsed in views towards the listed railway building from Station Hill (subject to detailed design), but would be characteristic of the existing townscape and would not backdrop the listed building. Trees and intervening buildings provide screening of the site in views of and from Kings Meadow Swimming Pool, such that changes related to the site's redevelopment would be minor and be characteristic of the pool's existing setting. From the western part of the Reading Abbey Scheduled Monument and Forbury Garden (Grade II Registered Park and Garden) filtered winter views of taller components of any future redevelopment could be visible above the railway line, but would represent a small, distant change to the existing setting, and would be characteristic of the significant 20th-century development surrounding the railway line. It is expected that it would be possible to accommodate a redevelopment without material change to the setting of these assets.</p> <p>It is expected redevelopment of the site would be visible from Mclroy Park, in views towards Chazey Barn Farm, the Thames meadows and the Chiltern Escarpment' of the Assessment of significant Views with Heritage interest (2018) document. It is expected proposals to redevelop the site could comprise a small change which would be characteristic of the town-centre townscape within this part of the view, and would not have an adverse effect on the view (subject to detailed design and massing). It is not expected that redevelopment of the site would be visible from the from the nearby Market Place/London Steet Conservation Area (subject to detailed design and massing).</p> <p>Due to the limited role that heritage assets play in the setting of the site, the potential to optimise the number of units that can be delivered should be fully explored.</p> <p>Sustainability Our clients would seek to achieve high sustainability standards within redevelopment of the site, through the implementation of a tailored sustainability design brief. Climate change and carbon emissions, overheating, health and wellbeing principles, resources and energy efficiency would be prioritised throughout the design.</p>	
--	--	--

	<p>An Energy Strategy would identify opportunities to reduce carbon dioxide (CO2) emissions and optimise energy efficiency within the redevelopment. An Energy Strategy would be developed using a ‘fabric first’ approach through the ‘Be Lean, Be Clean and Be Green’ energy hierarchy. The first step will be to maximise reduction in energy through passive design measures, before seeking opportunities to deliver energy efficiently, and then maximising the provision of low and zero carbon technologies.</p> <p>A form and fabric first approach would maximise efficiency of the buildings, taking overall building layout and form into consideration, as well as the fabric thermal performance of the buildings’ envelopes. Further efficiency would be achieved through solutions such as low U-values, air permeability and efficient glazing to minimise heat losses in winter and maximise coolth retention in summer months.</p> <p>As part of the form and fabric analysis, overheating studies would be undertaken to ensure that passive measures are adopted in order to help to mitigate the risk of overheating. There would be a strategy in place to ensure that all dwellings comply with Part O of the building regulations. In summary there is an exciting opportunity to introduce a building reflecting modern standards of energy efficiency and design, which are not present in the existing building.</p> <p>Sustainable Transport</p> <p>The site benefits from being located within a highly accessible location to Reading Railway Station (3 minute walk) and Reading Town Centre (10 minute walk), enabling future residents excellent access to amenities and jobs via sustainable modes. Alongside having convenient access to public transport facilities located at the station and throughout the town centre the site is bound by Reading Cycle Route 4 to the west along Norman Place and Nation Cycle Network 5 to the north running along the River Thames.</p> <p>Redevelopment of the site provides the opportunity to enhance the adjacent cycle route through the provision of a shared footway/cycleway located along the western edge of the site to improve connectivity between the IDR/Station and the River Thames (as indicated within Appendix 1). The site is expected to be able to take advantage of its excellent location to support sustainable travel above RBC’s suggested unit levels (240 dwellings) and still reduce the traffic generated by a residential development in comparison to the existing office operation.</p> <p>Enhancement to Public Realm</p> <p>A public realm and pedestrian movement study was undertaken in November 2023. The results (some of which are outlined in appendix 1) identified several issues of the site in its existing condition, ranging from a lack of seating opportunities, poor wayfinding, and lack of amenities such as litter and dog waste bins.</p> <p>Furthermore, the Thames Path is a public footpath and forms part of National Cycle Route No. 5. However, the footpath becomes very narrow in places. This can cause conflict between pedestrians and cyclists when by-passing each other. Long stretches of narrow paths, bounded by private properties, with a lack of public open space can also create an intimidating, and in some cases threatening environment for people, particularly the elderly, the vulnerable and in some cases women and children.</p> <p>Identifying and understanding the main issues surrounding the site is key to developing opportunities which could, in part, solve some of these issues. The careful arrangement of the building footprint at Norman Place offers a unique opportunity to maximise public open space, leading to the creation of a new Waterfront Public Square which will revitalise this underused part of the Thames.</p> <p>It is the aim of Packaged Living to create a sensitively designed space which is respectful to the tranquil setting of the River Thames whilst also creating a new and inclusive community hub for all – whether you’re a resident, a by-passer, cyclists, or visitor.</p>	
--	---	--

<p>Several opportunities are currently being explored which include feedback received via a recent public consultation exercise⁷. They include a flexible space for community-based events and gatherings, places to sit and dwell with integrated terraced seating and café-spill out which overlook the River Thames, a cycle hub with bike repair facilities, and improved cyclist and pedestrian connections along the Thames Path and Norman Place.</p> <p>Ecological Enhancement The Environment Partnership has been appointed by Packaged Living to advise on ecology in respect of the site's redevelopment.</p> <p>The site is not allocated for biodiversity purposes within the Reading Local Plan. The adjacent River Thames is listed as a Major Landscape feature (Thames Valley) in the adopted Local Plan.</p> <p>Our client is exploring the opportunities to achieve a net gain in biodiversity in the redevelopment of the site together with ecological enhancement features.</p> <p>Air Quality Hydrock has been appointed by Packaged Living to advise on air quality issues related to redevelopment of the site. The site is located within the Air Quality Management Area (AQMA) which covers all of the Reading town centre and major arterial routes. An initial assessment of the site suggests that it is not situated within an area of poor air quality and any new developments would not require mitigation to protect future users from poor air quality. Indeed, the current air quality at the site has exhibited an improving trend since 2018 and is below the Air Quality Standards objectives for pollutants of concern.</p> <p>The site is situated in the town centre and would encourage sustainable transportation choices, which would also be advantageous to the existing and future occupants of the area. Considering the location of the site, various sustainable travel options would be available. There are no significant air quality constraints and the site is considered to be suitable for residential use.</p> <p>Acoustic Hoare Lea has been appointed by Packaged Living as acoustic consultants. They have undertaken an environmental sound assessment of the site which establishes the site could provide a suitable acoustic environment for commercial and residential use. The site offers the opportunity to provide excellent living conditions commensurate with local and national planning policy in respect of noise with connection to the adjacent Thames Path.</p> <p>Re-assessment of Norman Place against the Sustainability Objectives Earlier analysis within these representations highlights the increasing importance of the LPPU making an effective use of land, at sites such as Norman Place given their potential to contribute towards RBC's increasing housing need. Section 4 of these representations summarises ongoing detailed assessment work being undertaken and being discussed with the Council via pre application, to accompany a future planning application. This section considers the scoring of the site during the SA accompanying the LPPU. It comments on this scoring and provides a reassessment of the LPPU development options for the site, on the basis of the more detailed emerging information.</p> <p>Assessment of the LPPU development options RBC's SA which accompanies this consultation assesses the four development options (Cen5 (i) – (iv)) for Norman Place against the 20 sustainability objectives (see Appendix 1). The SA states that Cen5 (iv) (Conversion to residential, estimated 70-80 dwellings) <i>"is the preferred option as it would result in the most positive sustainability effects"</i> (p. 171). This section</p>	
---	--

	<p>highlights that this development option would result in a number missed opportunities, and our client’s fundamentally reject that it would result in the most positive sustainability effects.</p> <p>To assist reconsideration of the SA’s conclusions about the preferred development option in the context of the detail submitted within these representations, we now rescore the four development options against the same sustainability objectives.</p> <p>i) Residential development of up to 240 homes This will make the most significant contribution (of the development options considered) towards meeting the significantly increasing need for market and affordable housing within the borough at a sustainable brownfield site. This development option would have greatest potential to deliver enhancements in terms of public realm together with associated enhancements to landscape, ecology, cycle routes and floodplain storage capacity.</p> <p>ii) Residential development at more general town centre or edge of centre densities (110-185 dwellings) With a reduced quantum of development, this development option would make a less meaningful contribution towards the significantly increasing need for market and affordable housing within the borough. This is of particular concern given the NPPF’s requirements outlined previously to make an effective use of land in sustainable urban centres such as this.</p> <p>iii) Conversion to residential, estimated 70-80 dwellings The SA highlights this option to be the highest scoring. However it is of greatest likelihood that this development option would be realised through Permitted Development Rights. Should this be the case the proposal would only make a modest contribution towards market housing need, and would deliver no affordable housing. This would be a fundamental failure on the NPPF’s clear encouragement for optimising site densities and making an effective use of sustainable land in urban centres. Furthermore this development option would miss an opportunity to improve access to the watercourse and deliver a high quality public realm adjacent to the river which can be used by local people. This is something which is valued by existing development plan policy EN11.</p> <p>iv) Do not allocate For the reasons outlined the site provides a sub optimal location for employment use. Not allocating the site for residential development would lead to the building being underutilised and a failure to make an effective use of this sustainable brownfield site, which is especially harmful in the context of RBC’s increasing housing need.</p> <p>Summary of assessment against SA objectives The scoring within table 5.1 highlights that of the assessed development options, redevelopment of the site for 240 units provides the greatest opportunity to achieve the most positive sustainability effects. However for the reasons outlined within these representations, our client is of the view that the site has potential to deliver in excess of 240 units. This would be consistent with the NPPF’s emphasis on making an effective use of land, optimising density and meeting objectively assessed need in urban centres.</p>	
Thames Water	<p>Site Name: Sapphire Plaza, H M Revenue, Watlington Street, Customs, Reading, Berkshire RG1 4TA Net gain to system (/day): 273240 Net foul water increase to system (l/s): 3.16 Net property equivalent increase – waste: 256 Net increase in demand (l/d): 140600 Net increase in peak demand (l/s): 4.88 Net property equivalent increase – water: 402</p> <p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the</p>	Noted. Any site-specific concerns are factored into the proposed policy allocation.

	<p>earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning.</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	
<p>Environment Agency</p>	<p>Site Name: Sapphire Plaza, Watlington Street and Royal Court, Kings Road</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): Small portion of FZ 2 and 3 along north boundary of site. Kennet and Avon Canal approx 5m north of site. Atlantic Salmon and European Eel migratory route. Superficial Secondary A aquifer and Bedrock Principal aquifer.</p> <p>Chosen option and requirements: The red line boundary is on the edge of the 5% AEP and 3.3% AEP extents so development could be considered incompatible with the flood zone. The site is close to the main river so development on this site would likely be flagged as needing a Flood Risk Activity Permit.</p> <p>Opportunities: On the banks of the Kennet and Avon canal, and currently hard bank, so there could be opportunities for river restoration on the river bank. It is currently hard bank in the site area and this would benefit from being a more natural bank, or even some vegetation like floating rafts</p>	<p>Noted. The proposed allocation highlights the need for planting along the riverbank and the need to take flood risk into account.</p>
<p>Thames Water</p>	<p>Site Name: Site Cen1: Aquis House, 49-51 Forbury Road and 33 Blagrove Street</p> <p>Net gain to system (/day): Net foul water increase to system (l/s): 0 Net property equivalent increase – waste: Net increase in demand (l/d): 0 Net increase in peak demand (l/s): 0 Net property equivalent increase – water: 0</p> <p>Water response: 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.</p> <p>Waste response: The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.</p>	<p>Noted. Any site-specific concerns are factored into the proposed policy allocation.</p>

<p>Environment Agency</p>	<p>Site Name: Aquis House, 49- 51 Forbury Road and 33 Blagrove Street</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ 1. Holy Brook approx 325m south of site. Superficial Secondary A aquifer.</p> <p>Chosen option and requirements: Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK (www.gov.uk)</p>	<p>Noted. No change proposed.</p>
<p>Thames Water</p>	<p>Site Name: Site Cen10: Part of Reading College, Kings Road</p> <p>Net gain to system (/day): 48114</p> <p>Net foul water increase to system (l/s): 0.56</p> <p>Net property equivalent increase – waste: 45</p> <p>Net increase in demand (l/d): 15750</p> <p>Net increase in peak demand (l/s): 0.55</p> <p>Net property equivalent increase – water: 45</p> <p>Water response: On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	<p>Noted. Any site-specific concerns are factored into the proposed policy allocation.</p>
<p>Thames Water</p>	<p>Site Name: Site Cen2: Reading Central Library, Abbey Square</p> <p>Net gain to system (/day): 0</p> <p>Net foul water increase to system (l/s): 0</p> <p>Net property equivalent increase – waste: 0</p> <p>Net increase in demand (l/d): 0</p> <p>Net increase in peak demand (l/s): 0</p> <p>Net property equivalent increase – water: 0</p> <p>Water response: 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 xxxxx to discuss the water infrastructure needs relating to the Local Plan.</p> <p>Waste response: The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage</p>	<p>Noted. Any site-specific concerns are factored into the proposed policy allocation.</p>

	<p>treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.</p>	
Environment Agency	<p>Site Name: Reading Central Library, Abbey Square</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ 1. Holy Brook on site (runs under library). Atlantic Salmon and European Eel migratory route. Bredrock Principal aquifer, Superficial Secondary A aquifer. Former warehouse on site - potential contamination.</p> <p>Chosen option and requirements: The Plan refers to this site as being in Flood Zone 3 and our modelling shows the site to be on the boundary of Flood Zone 3b. The proposed development is therefore not compatible with this flood zone. The culverted main river (Holy Brook) runs beneath the site. The culvert poses an issue as building over or extending a culvert is not usually supported by the Environment Agency. Due to the proximity to the main river development on this site would likely be flagged as needing a Flood Risk Activity Permit</p> <p>Opportunities: As the Holy Brook runs under the site, there needs to be the opportunity to de-culvert it in the future. This is in line with current policy EN11, specifically paragraph 4.2.48 which talks about de culverting the Holy Brook for ecological and flood risk benefits</p>	<p>The site falls within Flood Zone 3b purely due to the fact that the Holy Brook passes through it and the existing building spans the brook. The land on which any building would be built falls outside Flood Zone 3. The policy clarifies that development should not take place within Flood Zone 3.</p>
Thames Water	<p>Site Name: Site Cen3: John Lewis Depot, Mill Lane</p> <p>Net gain to system (/day): 134640</p> <p>Net foul water increase to system (l/s): 1.56</p> <p>Net property equivalent increase – waste: 126</p> <p>Net increase in demand (l/d): 70000</p> <p>Net increase in peak demand (l/s): 2.43</p> <p>Net property equivalent increase – water: 200</p> <p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	<p>Noted. Any site-specific concerns are factored into the proposed policy allocation.</p>
Environment Agency	<p>Site Name: John Lewis Depot, Mill Lane</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ 1. River Kennet approx. 90m west of site. Bedrock Principal Aquifer.</p>	<p>Noted. No change proposed.</p>

	<p>Chosen option and requirements: Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK (www.gov.uk)</p> <p>Opportunities: Any option (perhaps in this case option 2 on the alternative development options) which encourages more space on site for biodiversity benefits should be encouraged due to the urbanised nature of the area the site is located</p>	
Thames Water	<p>Site Name: Site Cen4: Crowne Plaza Reading, Richfield Avenue</p> <p>Net gain to system (/day): 0 Net foul water increase to system (l/s): 0 Net property equivalent increase – waste: 0 Net increase in demand (l/d): 0 Net increase in peak demand (l/s): 0 Net property equivalent increase – water: 0</p> <p>Waste response: The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.</p>	Noted. Any site-specific concerns are factored into the proposed policy allocation.
Environment Agency	<p>Site Name: Crowne Plaza Reading, Richfield Avenue</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ 2 and 3. River Thames adjacent. Atlantic Salmon and European Eel migratory route. Historic landfill site (Richfield Avenue) and Bedrock Principal Aquifer and Presence of investigated site</p> <p>Chosen option and requirements: The site is within Flood Zone 3a, and the red line boundary is on the edge of the 5% AEP and 3.3% AEP extents (Flood Zone 3b) so the proposed developments could be considered incompatible with the flood zone. Most of the site is within the 1% AEP plus climate change extent so there could be an increase in risk elsewhere because level for level floodplain compensation may not be achievable. The document refers to the sequential test and the exception test but no parameters of what would be considered suitable development have been provided. The site borders Environment Agency owned land so this should be considered depending on the location of works within the red line boundary. This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use. We would endorse that sites are fully investigated following LCRM guidelines - Land contamination risk management (LCRM) - GOV.UK (www.gov.uk).</p> <p>Opportunities: The site is next to the Thames and the red line boundary goes up to the river bank, therefore there could be a lot of opportunity for re naturalisation of the river bank.</p>	No change proposed. The site is not proposed to be included as development allocation in the plan.
Thames Water	<p>Site Name: Site Cen5: 2 Norman Place</p> <p>Net gain to system (/day): 161568 Net foul water increase to system (l/s): 1.87 Net property equivalent increase – waste: 151 Net increase in demand (l/d): 84000 Net increase in peak demand (l/s): 2.92 Net property equivalent increase – water: 240</p> <p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the</p>	Noted. Any site-specific concerns are factored into the proposed policy allocation.

	<p>earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	
<p>Environment Agency</p>	<p>Site Name: Norman Place</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ 2 and 3 within/around boundary of site. River Thames adjacent. Atlantic Salmon and European Eel migratory route. Bedrock Principal Aquifer and presence of investigated site adjacent.</p> <p>Chosen option and requirements: The site is in Flood Zone 3. The majority of site is outside the 1% AEP plus climate change extent, but the main access road is within the climate change extent so access and egress should be considered for the lifetime of any development. The red line boundary is on the edge of the 5% AEP and 3.3% AEP extents so development could be considered incompatible with the flood zone. This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use. We would endorse that sites are fully investigated following LCRM guidelines. Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</p> <p>Opportunities: The site is next to the Thames, so there is a good opportunity for river restoration and re-naturalisation and we would like to be consulted. More space should be created on the site for biodiversity enhancements.</p>	<p>Noted. The need for flood risk issues to be addressed is highlighted in the policy as is the need to enhance the biodiversity value of the riverbank where possible.</p>
<p>Thames Water</p>	<p>Site Name: Site Cen6: Reading Bridge House, George Street</p> <p>Net gain to system (/day): 269280</p> <p>Net foul water increase to system (l/s): 3.12</p> <p>Net property equivalent increase – waste: 252</p> <p>Net increase in demand (l/d): 140000</p> <p>Net increase in peak demand (l/s): 4.86</p> <p>Net property equivalent increase – water: 400</p> <p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning</p>	<p>Noted. Any site-specific concerns are factored into the proposed policy allocation.</p>

	<p>conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	
<p>Environment Agency</p>	<p>Site Name: Reading Bridge House, George Street</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ 2, small portion of FZ 3 in north of site. River Thames adjacent. Atlantic Salmon and European Eel migratory route. Bedrock Principal Aquifer identified there could be potential contamination.</p> <p>Chosen option and requirements: The red line boundary is on the edge of the 5% AEP and 3.3% AEP extents so development could be considered incompatible with the flood zone. The site is within the 1% AEP plus climate change extent so there could be an increase in risk elsewhere because level for level floodplain compensation may not be achievable</p> <p>Opportunities: The site is next to the Thames, so there is a good opportunity for river restoration and re-naturalisation and we would like to be consulted. More space should be created on the site for biodiversity enhancements.</p>	<p>Noted. The need for flood risk issues to be addressed is highlighted in the policy as is the need to enhance the biodiversity value of the riverbank where possible.</p>
<p>Thames Water</p>	<p>Site Name: Site Cen7: Tesco Extra, Napier Road Net gain to system (/day): 134640 Net foul water increase to system (l/s): 1.56 Net property equivalent increase – waste: 126 Net increase in demand (l/d): 70000 Net increase in peak demand (l/s): 2.43 Net property equivalent increase – water: 200</p> <p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by</p>	<p>Noted. Any site-specific concerns are factored into the proposed policy allocation.</p>

	<p>visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	
<p>Environment Agency</p>	<p>Site Name: Tesco Extra, Napier Road</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ 2. River Thames approx. 45m north of site. Deciduous woodland. Historic Landfill (Napier Road), Bedrock Principal Aquifer and Superficial Secondary A aquifer and Presence of investigated site.</p> <p>Chosen option and requirements: The site is in Flood Zone 2. Most of the site is within the 1% AEP plus climate change extent so there could be an increase in risk elsewhere because level for level floodplain compensation may not be achievable. It should be noted that Napier Road floods and that is the only vehicle access route. The Thames Path to the north and underpass under the railway also floods so all pedestrian routes will also be impacted in a flood. This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use. We would endorse that sites are fully investigated following LCRM guidelines. Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</p> <p>Opportunities: The site is near to the river, so there are good opportunities for river restoration. This will enhance the towpath between the site and the riverbank and it is very well used in that area. There is also a wooded area between the site and the river, which could be ecologically enhanced and aesthetically pleasing.</p>	<p>Noted. The need for flood risk issues to be addressed is highlighted in the policy.</p>
<p>Thames Water</p>	<p>Site Name: Site Cen8: Kennet Place, Kings Road</p> <p>Net gain to system (/day): 47124</p> <p>Net foul water increase to system (l/s): 0.55</p> <p>Net property equivalent increase – waste: 44</p> <p>Net increase in demand (l/d): 24500</p> <p>Net increase in peak demand (l/s): 0.85</p> <p>Net property equivalent increase – water: 70</p> <p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to</p>	<p>Noted. Any site-specific concerns are factored into the proposed policy allocation.</p>

	<p>accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	
Environment Agency	<p>Site Name: Kennet Place, Kings Road</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ 1, River Kennet approx 6m north of the site. Atlantic Salmon and European Eel migratory route. Superficial Secondary A aquifer and Bedrock Principal aquifer and Presence of investigated site.</p> <p>Chosen option and requirements: Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK (www.gov.uk) It is in Flood Zone 1 and close to the main river so development on this site may need a Flood Risk Activity Permit. This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use. We would endorse that sites are fully investigated following LCRM guidelines. Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</p> <p>Opportunities: This is on the banks of the River Kennet and near to the Kennet and Avon canal too, hence there could be opportunities for river restoration on the river bank. It is currently hard bank in the site area and this would benefit from being a more natural bank, or even some vegetation like floating rafts.</p>	Noted. The proposed allocation highlights the need for planting along the riverbank.

Q. 69 Do you have any comments on the proposed changes to policy CR15 regarding the Abbey Quarter?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Friends of Reading Abbey	N/A	<p>We support the proposed changes to CR13a (Reading Prison) to place greater emphasis that a future cultural, heritage and/or leisure use is absolutely essential.</p> <p>We support the proposed changes to CR15 (Reading Abbey) to include the Prison site as part of the Abbey Quarter and that the areas should link into and complement one another.</p> <p>In both respects we would make clear that the Prison site is an integral part of the Abbey Quarter, it is covered by the Abbey's Scheduled Ancient Monument listing, and it is essential that they are planned together in ways which complement the cultural and heritage setting of the Quarter, and open up public linkages between and within all parts of it.</p>	<p>Comments are noted. Partially agreed. The supporting text already makes clear that Reading Gaol is a key feature of the heritage asset that is The Abbey and therefore it is not considered necessary to reiterate this within the policy wording. However, the word 'historic' has been added to highlight its importance.</p> <p>The policy has been extended to emphasise the opportunity to consolidate the cultural setting of The Quarter (in addition to the heritage interest).</p>

			The policy has been expanded to state that the linkages should provide public access where possible.
R K Lambra-Stokes	N/A	Should include public access. Key features of the prison must be preserved and maintained	Policy has been amended to state that public access via linkages should be provided where possible. The policy also requires the protection and enhancement of the historic setting.
CADRA	N/A	CADRA supports the proposed change.	Answer is noted. No changes required.
FCCG	N/A	The prison complex is an integral part of the Reading Abbey Quarter and any development must take account of its historical and heritage role.	Answer is noted. No changes proposed. Policy already sets out requirements for development within the Abbey Quarter (including Reading Gaol) and associated heritage considerations.
Damians Bramanis	N/A	Agree with the proposed change.	Answer is noted. No changes required.
CAAC	N/A	Agree	Answer is noted. No changes required.
Historic England	N/A	We support the proposed change. Links to the prison will require very careful design. Historic England have previously agreed that some gaps in the prison wall could be opened but they will need to be limited, and carefully positioned, both to prevent negative impact on the significance of the listed prison, and to enhance understanding of the Abbey ruins and below-ground remains.	Answer is noted, however, no changes are needed. It is agreed that careful design will be necessary. This, and any detail on building works to the prison, will be dealt with at the planning application stage.
M Langshaw	N/A	Very much agree with the proposal	Comments are noted. No changes required.

Additional representations submitted via email regarding policy CR15

Respondent name	Comments	RBC Officer Response
Berkshire Gardens Trust	We fully support the inclusion of the Prison into the Abbey Quarter which includes the Forbury Gardens. The proposed policy change that the Abbey and prison areas should link into and complement one another should also include the linking and complementing of the Forbury Gardens with the Abbey. These are also two very different heritage assets.	Noted. No change needed.
The Kennet & Avon Canal Trust	Regarding the Gaol development - This is an important site bordering the canal and Abbey Ruins. Discussions on future use is ongoing. KACT considers it essential that these include consideration of the impact of any development on the adjacent waterway. Whatever is decided, integration of visual aspect and access routes with the adjacent waterway is considered essential. This does not necessarily imply an open frontage as insertion of archways into the current prison wall could maintain demarcation between Chestnut Walk and the development. As noted above, Chestnut Walk is an excellent location for short-term boat mooring. The Gaol development could facilitate provision of water and other facilities to boats visiting the town centre.	Noted. The policy should recognise the importance of the waterside environment.

Q. 70 Do you have any comments on the proposed changes to policy SR1 regarding the Island Road area?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Karen Doyle	N/A	Don't think that is a good place to build houses!	Noted. There is no housing proposed on the site.
Thames Water	N/A	In relation to the site currently allocated as SR1c, Island Road A33 Frontage Thames Water continues to support the flexible commercial uses proposed in this allocation. Since the allocation was made over five years ago the need for and importance of storage and distribution has increased. This was reflected in the Council's intention in its recent Call for Sites to review policies SR1 and EM1 responding to the NPPF para 83 (now 87) requiring planning policy to consider the need 'for storage and distribution operations at a variety of scales and in suitably accessible locations'. The SR1c site is able to operate at a viable scale for a storage and distribution operation and is in a highly sustainable and accessible location adjacent to the A33.	Noted. No change proposed.

		The addition of storage and distribution to the allocation is considered to be compatible to the neighbouring uses including the A33 and Sewerage Treatment Works. The site remains deliverable in the Local Plan period with no known deliverability constraints. The extant allocation demonstrates the acceptability of employment uses including industrial and warehousing. Storage and distribution is considered to have similar impacts to general industrial uses so would therefore not require any further assessment. Thames Water otherwise has no comments to make on the proposed changes and supports the continued allocation.	
The Woodland Trust	N/A	This is a significant area of open space. The opportunity should be taken to increase tree canopy cover and explore its potential for nature recovery.	Noted. This will be addressed at application stage and required by other policies within the Local Plan, such as EN12: Biodiversity.

Q. 71 Do you agree with the proposed changes to the existing allocated sites in South Reading? Do you want to see any other changes?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
R K Lambra-Stokes	Other	Wintersports provision (eg. Ice rink / Snow slope) or other leisure facilities could be considered in the Green Park / Reading Football Stadium area.	No changes required. No provision for winter sports was been submitted via the Call for Sites exercise carried out in 2023. As the Green Park / Reading Football Stadium area are privately owned, RBC do not have the power to implement such a use here. Should such an application come forward in the future, it will be assessed against policies RL2 and CR4.
The Woodland Trust	Other	As no longer being allocated for housing, this area should be prioritised for nature recovery and woodland creation, including extending existing wooded areas at Great Lea Common and Grazeley Court (Priority Habitat Inventory - Deciduous Woodland).	Noted. This is outside the scope of the Local Plan, but should an application come forward on this site, it would be considered against existing natural environment policies within the Local Plan.

Additional representations made via email regarding sites in South Reading

Respondent name	Comments	RBC Officer Response
Katesgrove Community Association	Regarding Tunbridge Jones, Craddock Road The area is protected as part of a Core Employment Area and is currently surrounded on all sides by commercial and industrial uses which would have very significant implications for any residents, if development was permitted. Potential contamination across much of the site. This site is NOT appropriate for use as residential. Developing housing in a designated and established industrial/commercial area would create a very poor living environment. KCA would support option 2 as put forward by RBC	Noted. This site does not form a proposed allocation in the Local Plan Partial Update.
Savills (OBO Crest Nicholson)	In the previous Wokingham Regulation 18 Consultation in 2020, Grazeley Garden Town ('GGT') was identified as a preferred option for strategic residential development as a 'Garden Town' of 15,000 houses. As you will be aware subsequently to this decision, a change in legislation resulted in the redetermination and expansion of the Urgent Action Area and the Detailed Emergency Planning Zone ('DEPZ') around AWE Burghfield, leaving Grazeley Garden Town no longer achievable. As a result, CN has been assessing alternative appropriate land uses in the northern part of the site adjacent to Reading and the M4. In light of this, CN promoted the site for I&L development and submitted representations to Wokingham's Regulation 18 Consultation in January 2022 and subsequently to West Berkshire in March 2023. It is considered that, as the site is located within a strategically important economic area, the site could deliver employment land of a scale which would benefit the wider sub-region including adjacent authority areas, such as Reading, in terms of job creation and economic outputs.	Noted. It is agreed that employment evidence needs to be updated, and a new Commercial Development Needs Assessment has been produced which continues to identify a high level of need for industrial and warehouse floorspace. In terms of the Grazeley area, other than a very small area of land which cannot be accessed from

<p>Development on land at Grazeley will be underpinned by a commitment to environmental responsibility and sustainable practices. Guided by overarching placemaking principles, Crest Nicholson are committed to delivering high quality developments and designs that support a thriving community and economy.</p> <p>The UK planning system, via the allocation of enough employment land in the right locations, is critical to facilitating the sector's growth. See NPPF paragraph 85, 86(a), 87</p> <p>The specific mention of storage and distribution operations [within paragraph 87] was long overdue and provides recognition of the recent growth in this sector, which underpins its strategic importance as a consideration within the plan making process. Indeed, to be one of only three sectors explicitly mentioned in the 'Building a Strong, Competitive Economy' chapter is testament to the role that logistics could play in the future economy.</p> <p>See PPG Paragraphs 025 Ref ID: 2a-025-20190220, Paragraph: 026 Reference ID: 2a-026-20190220, 027 Reference ID: 2a-027-20190220, 031 Reference ID: 2a-031-20190722</p> <p>However, the Guidance then fails to translate this sentiment into a clear and robust approach which ensures logistics needs are met.</p> <p>The Berkshire FEMA – 2016 Nathaniel Lichfield and Partners produced a study titled the Berkshire Functional Economic Market Area ('FEMA') Study in February 2016 on behalf of the Thames Valley Berkshire Local Enterprise Partnership ('TVBLEP') and the six Berkshire authorities of Bracknell Forest, Reading, Slough, West Berkshire, Windsor and Maidenhead and Wokingham to investigate economic relationships, linkages and flows which characterise the sub-regional economy. The Berkshire FEMA, is comprised of three core FEMAs that represent a 'best fit' within local authority boundaries; the 'Central Berkshire FEMA', 'Western Berkshire FEMA' and 'Eastern Berkshire FEMA'.</p> <p>A further report was commissioned to consider the objectively assessed economic development needs of the Western Berkshire FEMA – The Economic Development Needs Assessment (EDNA) (2016).</p> <p>The purpose of the EDNA studies was to identify the objectively assessed economic development needs for the authorities within each FEMA over the 2013-36 period. Land and floorspace requirements were quantified, as well as a qualitative assessment of future change for individual employment sectors and uses. RBC relies upon the outputs of the EDNA study to determine employment land need (see paragraph 4.3.3 of Reading Local Plan). Savills disagrees with the reliance on such out of date data.</p> <p>The EDNA, under scenario 3 'labour supply', notes Reading to a gross Industrial Land (B1c/B2/B8) need of 57.9ha and a gross Office (B1a/B1b) need of 24.4ha between 2013 and 2036. This translates to a net increase requirement of 148,000sqm of industrial and/or warehouse space and 53,000-112,000sqm of office floorspace.</p> <p>The FEMA, recognises that Reading is the largest and dominant employment centre in Berkshire and, further, that <i>"there is a big overlap between Wokingham and Reading, and indeed in property market terms the northwest part of Wokingham is considered to be urban Reading"</i> (paragraph 2.57). This relationship is reinforced in the Wokingham Employment Land Needs Review 2023.</p> <p>RBC has not produced an independent employment need review since 2006 and, as such, the Berkshire FEMA and Central Berkshire EDNA findings, as set out above, are considered the most up to date and appropriate local evidence base. Reading Local Plan (adopted 2019)</p>	<p>within Reading, all of the site is outside our area, and the relevant local planning authorities are not proposing to include an allocation at Grazeley in their respective plans. Any identification of land at Grazeley would need to be undertaken jointly in order to be deliverable. It is not therefore proposed to identify employment development at Grazeley in the Local Plan Partial Update.</p>
--	--

<p>In relation to Policy EM1 'Provision of Employment Development', paragraph 7.5 notes that there has been an increase in space of around 20,000sqm since the plan was adopted, but this leaves a substantial amount still to be delivered. The update recognises at paragraph 7.6 that the evidence on which these figures are based on is now more than five years old and, as such, requires updating. RBC notes that this evidence, however, has not yet been collated. CN agrees with both of the proposed changes set out under 7.7; to update the policy to refer to updated needs for office and industrial and warehouse uses, taking account of the most up-to-date information, and that consideration be given to any opportunity to meet unmet need for employment uses from other authorities. CN emphasise the importance that industrial and employment need should be reviewed on a sub-regional level.</p> <p>CN does not consider that the option set out under 7.8 is appropriate, which would mean leaving Policy EM1 reliant on out-dated data, which is contrary to the NPPF and NPPG.</p> <p>Based on the findings set out under the following section, CN considers that an updated evidence base would likely indicate that RBC needs to plan for a greater volume of industrial land. CN considers that the land at Grazeley would present an ideal opportunity to contribute towards this increased need.</p> <p>Savills research indicates that the I&L sector continues to break records as investment volumes top £4.7 billion in 2020. The sector now employs around 3.8 million people in England and represents 14% of the total economy in GVA terms, or £232 billion¹. Arguably, the most important characteristic of the sector is its above average productivity growth estimated to be 29% between 2025-2039 compared to 18% for all other sectors.</p> <p>The I&L sector is facing an era of unprecedented change. The past decade has seen the sector undergo a remarkable transformation, reshaping operating models and occupier requirements in ways that are only starting to become recognisable as an industry-wide phenomenon. Logistics uses in particular have shown strong performance for a number of years, but the Covid-19 pandemic has exacerbated existing trends with primary growth drivers including online shopping, UK freight volume and increased near-shoring and on-shoring.</p> <p>Combined, these growth drivers are resulting in unprecedented demand for I&L premises. Over the course of 2021 Savills Big Shed Briefing² found that gross take-up had reached a new annual record of 55.11 million sq ft – 86% above the annual average. This trend of increased update has continued, with the Savills Big Shed Briefing³ mid-year 2022 report noting a new H1 record of 28.6 sq ft surpassing last year's total of 24.5 sq ft and exceeding the H1 annual average by 90%. The number of transactions nationally was 220, surpassing the previous record of 172 in 2020⁴. A detailed analysis of the I&L market is provided at Section 3 of CN's appended representation to the Regulation 18 Wokingham Borough Council consultation.</p> <p>As set out in CN's representation to Wokingham's Regulation 18 Consultation in January 2022 consultation and West Berkshires Regulation 19 Consultation in March 2023, the site at Grazeley is considered optimal for delivering I&L need across the Berkshire FEMA.</p> <p>A summary of the suitability of Grazeley is provided in the table below which sets out the criteria that Savills believes to be the most influential when determining the site suitability for I&L and the justification for these criteria. Subsequently, it assesses the Grazeley site against the criteria. Savills considers that the site performs well against all criteria and this is considered highly suitable for I&L.</p> <p>It is noted that the existence of a DEPZ should not be a reason for assuming any development is inappropriate as the ONR's consultation processes ensures any proposed development would be judged on its own merits taking into account the details of the proposal and the effects the development would have on the on-site and off-site plans. Examples of I&L development in a DEPZ exist and include the recent outline planning permission at Blacks Lake Track Racing, Paices Hill, Aldermaston (Application No. 20/02527/OUTMAJ) for up to 15,917sqm of flexible commercial floorspace for B8 (Storage or distribution).</p>	
---	--

	<p><i>See PDF response for Table 1 showing Important I&L Site Attributes</i></p> <p>On review of the above, it is considered that Grazeley is exceptionally well placed to cater the sub-regional employment land needs because of its location on the strategic road network and public transport links to Reading and beyond.</p> <p>The development of land at Grazeley will be established on a robust and strong vision, with a commitment from CN as a development partner to create a high-quality, distinctive and sustainable new development with a lasting legacy. The vision for development will focus on key design principles:</p> <ul style="list-style-type: none"> ▪ A robust, clear, and logical movement framework, based on walkable neighbourhoods, that provides direct and easy to understand routes to facilities and services is a key ingredient of a successful and sustainable place. ▪ Providing opportunities for healthy living, personal well-being, investing into a positive collaboration process and delivering a balance of uses to create a long-term sustainable place will be fundamental to the legacy of Grazeley. ▪ Understanding the site and its surroundings to create a responsive design will create a place embedded in its locality and place. ▪ Quality design is fundamental and will be delivered through excellent public spaces, a clear hierarchy of attractive and harmonious streets that are at a human scale and respect the local character. <p>On review of the above, it is considered that Grazeley is exceptionally well placed to cater the sub-regional employment land needs because of its location on the strategic road network and public transport links to Reading and beyond.</p> <p>The development of land at Grazeley will be established on a robust and strong vision, with a commitment from CN as a development partner to create a high-quality, distinctive and sustainable new development with a lasting legacy. The vision for development will focus on key design principles:</p> <p>CN is committed to placemaking and creating attractive communities, which addresses the needs of Local Authorities and the local economy. As such, CN believes that land at Grazeley should be considered positively for development.</p> <p>Attached with the representation is a separate document titled 'Representations to Regulation 18 Preferred Options Consultation Wokingham Borough Council. Grazeley Representations' (Appendix 1)</p>	
<p>Iceni (OBO TT Group)</p>	<p>Regarding 11 Basingstoke Road</p> <p>The Site freehold is wholly owned by one party: Telereal Securitised Property GP Limited, with BT in occupation. The exception to this is the small area at the eastern edge of the development site, highlighted in yellow on the above plan. This area has been sold on a 999-year lease to Hart Housing Association and, as such, would not form a part of any wider site allocation. As part of their business planning, TTG are currently exploring options for the future redevelopment of the entire site.</p> <p>The Site was not previously put forward during the Call for Sites exercise for the Local Plan Partial Review which ran from April - June 2023. As such, it is not currently one of the 20 sites being considered for allocation through the review. Notwithstanding, TTG are currently in the process of reviewing their assets (including this Site) and it is likely that there will be an opportunity in the short-to-medium term for BT to fully vacate the Site. As previously stated, the ZSC is part of the network PSTN that will be switched off in December 2025 and the MSC has already essentially ceased operations. Given the Site's proximity to nearby local centres and the fact that the surrounding area is largely residential in nature, we would be considering a comprehensive residential-led development across the Site.</p> <p>See RBC Local Plan and Proposals Map (2019) for list of designations</p> <p>The Site is also located within the South Reading area as identified in the Local Plan, which is identified for a significant amount of new residential and employment development over the plan period. The Site is within a 'primarily residential area' within the Council's South Reading Area Strategy Map.</p>	<p>Agreed. This site forms a suitable allocation for residential development and is included within the Local Plan Partial Update.</p> <p>It should be noted that the 20% buffer referred to is only necessary under the NPPF where there has been significant under-delivery of housing.</p>

<p>It is therefore considered that there is justification at a local policy level for redevelopment of this key site. This is considered in further detail below in conjunction with other relevant local and national planning policies.</p> <p>Based on our assessment of the Site context, planning policy designations, and the strategic objectives for the area set out within relevant local planning documents, we consider that this Site presents a fantastic redevelopment opportunity which could assist the Council in delivering much needed housing in a sustainable location. Given the longer-term nature of the Site and the various complexities associated with such a constrained urban site, its redevelopment potential would be helped with the provision of a site allocation in the emerging Site Allocations Document.</p> <p>At this stage, TTG have carried out high-level capacity studies of the Site, taking on board the local context as well as market demand to inform what scale and type of development may be appropriate on the Site. Based on these initial exercises, it seems that the Site would be well placed to accommodate a residential-led development in isolation, or a residential-led development alongside housing for older people. As such, we would like to promote the Site for the following quantum of development, the basis of which could be used to inform a site allocation:</p> <ul style="list-style-type: none"> • Erection of 220 residential units comprising a mix of studio, 1-bed, 2-bed and 3-bed dwellings. Potential for dwellings to be split between mix of residential dwellings (Class C3) and care home use (Class C2). The precise configuration and mix of dwellings on the Site would be decided during the application stage of development. • Rationalisation of car parking and access/servicing arrangements across the site as a whole, to deliver a development focused on sustainable and active travel, with appropriate parking to service the new residential uses. • Improved public realm and pedestrian connections, including potential to deliver section of Proposed Green Link, as designated in the Local Plan. • Optimisation of the density, heights and massing of the site while respecting and enhancing the existing townscape and historic environment. Capacity studies and assessment of impact on the Conservation Area and nearby properties suggest development of up to 6-storeys, stepping down to 3 storeys may be appropriate on the Site. <p>It is noted that, as of 2021-2022, according to the Housing Delivery Test, Reading has been able to deliver 1,989 homes against a three-year target of 1,630, and therefore the actual delivery of housing was at 122% of the housing requirement. Paragraph 74 of the NPPF requires the Council's housing targets to be subject to a 20% buffer, to identify further specific deliverable sites to improve the prospect of achieving the planning supply within the Reading Borough Area.</p> <p>There is clear evidence that the Council's housing needs target will be revised upwards during the Local Plan Review, regardless of the calculation methodology selected. As such, there appears to be a need – in the short to medium term – for additional, deliverable sites for new housing within Reading, in order to deliver an adequate supply of new homes and contribute significantly to meeting the anticipated demand for new housing across Reading Borough and the wider Berkshire area. It is considered that a site allocation for residential-led redevelopment represents a strong opportunity to achieve significant residential accommodation and contribute towards meeting the housing need, following the increase anticipated through the Reading Local Plan Review.</p> <p>The NPPF supports the delivery of high quality, well designed housing which meets local needs on sustainable and accessible sites. The introduction and intensification of residential uses in areas with good public transport accessibility and as part of a mixed-use scheme is also a theme which runs through both the NPPF and the Reading Local Plan. In this regard, there is a strong case to support the allocation of the Site for residential use. The Site represents a sustainably located brownfield location, which is well served by public transport and in close proximity to a number of local shops and</p>	
--	--

<p>services. Furthermore, the NPPF and the Reading Local Plan emphasise the importance of meeting housing need through the efficient use of land.</p> <p>With regard to the quantum of residential units proposed, it is noted that Local Plan Policy H2 (Density and Mix) states that the appropriate density of residential development will be informed by aspects such as the character and mix of uses in the area, accessibility by walking and the need to maximise the efficiency of land use. Given the highly accessible and sustainable location of the Site, as well as its large size in the context of the local area and the scale of the buildings currently in situ, it is considered that there is a strong case for the optimisation of the site massing and density.</p> <p>However, at the same time, it is recognised that site constraints do exist, including the nearby Conservation Area and the Listed Buildings. It is therefore considered that any site allocation should include the requirement to enhance the townscape in this part Reading. Taking this on board, our early-stage modelling has indicated that up to 220 residential units could be delivered across a range of housing types and sizes, and with the potential to also provide housing for the elderly as part of this mix. Such an allocation for residential development is considered to provide a suitable level of intensification for this large, accessible site. Setting an allocation for the scale of development set out above allows enough flexibility to deliver a range of homes within the limit, allowing the project to be deliverable within the townscape, heritage and amenity constraints identified.</p> <p>An initial review of development opportunities at the Site has identified the potential for the inclusion of housing for older people. Policy H6 (Accommodation for Vulnerable People) in the adopted Local Plan states that provision will be made for at least an additional 253 residential care bedspaces for elderly people between 2013-2036, in addition to the overall housing need. Development for specialist accommodation is expected to be located close to community facilities, particularly healthcare services or day care for elderly facilities. Developments to accommodate people with limited ability should also be located within 400m of an identified district local centre.</p> <p>This need was identified in the Local Plan due to several factors such as a rising population of over-65s (anticipated to increase by 60% to 2036) and the fact that many people with existing needs are currently housed in poor or unsuitable accommodation. However, the Local Plan review consultation document updates this position, stating that there has been a substantial provision of extra care housing in recent years in Reading, to the extent that there is considered to be an over-supply, and as such there is no current need for further extra care. The document states that this policy should be amended to make this clear.</p> <p>Whilst the Local Plan review document notes that there has been an oversupply of Extra Care facilities, we assume this relates specifically to the Extra Care accommodation only (i.e. accommodation for over-55s with higher levels of support and care provided), and not the wider older persons housing accommodation which can be provided in a variety of forms, including Care Homes. The type of facilities delivered by an Extra Care facility differ to that of a Care Home, and as such, it is unclear if the Local Plan Review is suggesting that there is a reduced need for both types of accommodation, or just Extra Care.</p> <p>Regardless, TTG have explored a variety of suitable uses for the Site and advice received from local agents and property experts suggests that there is still substantial demand from retirement operators for more housing for older people in the local area. As such, TTG would like to promote some flexibility in the site allocation to allow for both C2 and C3 uses, and enable the Site to deliver traditional residential dwellings as well as housing for older people if the demand remains.</p> <p>Due to the quantum of hardstanding, the set back, vacant and secluded character of the Site, as well as hard, inactive frontages, the Site is impermeable and unattractive for people to use to move around. There is currently no pedestrian access through the Site from east to west, with the minor vehicular entrance on Basingstoke Road being obstructed by a gated entry. As a result, it is considered that a site allocation could encourage significant improvements to the permeability of</p>	
--	--

	<p>the Site through a comprehensive public realm and landscaping scheme. The goal would be to allow for increased pedestrian connectivity and therefore an improved urban environment.</p> <p>In addition, the site allocation could encourage increased greening and provision of more soft landscaping. The site allocation would therefore seek to support the walkability, townscape and urban greening aims set out within the Reading Local Plan.</p> <p>The existing ZSC building on the Site is larger in scale and mass than any other buildings in the local area. While there are four storey blocks of flats to the immediate north (Christchurch Court) and south (Avenue Heights) of the Site, the surrounding area is predominantly composed of two-three storey dwellings, with a limited number of exceptions such as nearby schools and places of worship.</p> <p>Notwithstanding, given the presence of nearby flatted dwellings and the current context of the Site, it is considered that there is a strong case to be made for building heights and massing which are at least consistent with the existing buildings within the Site and immediate context. This will result in a similar impact to the adjacent buildings and townscape but allowing for an increase density and intensified use of the Site, in accordance with the NPPF and the Reading Local Plan.</p> <p>Any future development proposal would also be likely to be of a considerably higher standard of design than the existing 1960's buildings, thereby offering an improvement in the townscape and visual amenity of the locality. The development would take full cognisance of nearby heritage assets, including listed buildings and Conservation Areas. Optimised heights and massing will of course lead to an increased number of housing units and homes for older people, thereby an improved contribution towards the Council's targets in those areas, particularly for housing where the need is most pressing and expected to increase.</p> <p>If a site allocation were to be taken forward, the Site owner would be keen to work with the Council to test the options for height and massing to ensure these are suitable, whilst also delivering the much needed housing for the local area. Bearing in mind the existing heights on the Site, it is considered that a high-quality design, and assessment of local context and townscape impact, could result in development of up to 6-storeys being acceptable on the Site.</p> <p>The existing ZSC building is serviced occasionally by engineers so as to remain operational, but there are currently no fixed staff employed within this building. Furthermore, the BT Glasshouse is essentially vacant, with no ongoing employment servicing this building. As such, the existing building provides very little value in terms of employment offer. Furthermore, due to the niche use of the Site as a Switching Centre, it would not be easily converted for alternative employment uses. As such, TTG are exploring options for the demolition and redevelopment of the Site for non-employment generating uses.</p> <p>TTG supports the aim of Policy EM3 which seeks to maintain the level of employment land in the Borough. The Site is not located within a Core Employment Area, and as such, it should be considered acceptable for the existing employment uses to be lost to provide for much needed housing. This is particularly relevant to this Site, as the local area is more suited to residential uses and has been identified as an area in need of substantial housing growth. As such, it is considered that given the lack of employment generated from the existing use, that a new use which generated more housing would be welcomed by the Council.</p>	
--	--	--

Q. 72 Do you have any comments on the potential additional allocations to policy SR4?

Respondent name	Y/N/Other	Comments	RBC Officer Response
-----------------	-----------	----------	----------------------

Adam Boulding	N/A	yes - Kennet Island will need more parking if you increase the housing provision to 23 over the original 15 dwellings on the former marketing suite site	Answer is noted. No changes needed. Parking will be considered in detail at application stage and will be required to meet the Council's standards.
Karen Doyle	N/A	Keep retail!	Noted. No change proposed. Initial findings suggest that retail floorspace needs have decreased within the Borough, while housing needs have risen.
McConnell Planning (OBO Elstree Homes)	N/A	<p>Elstree Land confirms that it supports the nomination of site Sou3 Former Sales and Marketing Suite, Drake Way for a residential development of 23 units under Appendix 2. Elstree Land has an interest in this land and has sought pre-application advice from the Council for a development of the site to provide 23 new residential dwellings with a letter dated 18th December 2023 received from Ethne Humphreys of the Council (Ref 231462/PREAPP) advising on this proposed development. This letter is attached to this submission.</p> <p>Elstree Land has been discussing this site with Ethne Humphreys for some time now. The pre-application response is generally very positive with the letter confirming that the principle of providing residential development at the site is accepted. A temporary planning permission for the sales centre (ref 130623/FUL) expired back in 2019 with the site now having been vacant for several years. There is therefore an excellent opportunity to re-develop this vacant brownfield site, which is in a very sustainable location being close to many amenities and benefitting from very good public transport links.</p> <p>Furthermore, planning permission (ref 180543/FUL) was granted in September 2019 for the redevelopment of the site to provide 12 residential units (not 14 as referred to in the site allocation). However, it is considered that there is an opportunity to deliver more than 12 units on this site, with 23 units the targeted figure. The main reasons for this are that it has been possible to create a slightly larger building footprint than was the case with the 12 unit scheme, which allows for more units per floor and a part-fifth floor has been created within the proposed development whereas the approved scheme concerned a four storey development.</p> <p>It is considered that the proposed development for 23 units can be delivered to relevant standards for new housing with sufficient outlook and daylight, and without causing a material loss in the residential amenity of adjacent residents, notably the development reduces to 4 storeys closer to Drake Way. It supports the existing townscape qualities with the 5 storey component being visible from the A33, which is consistent with the 5 storey height of the adjacent Hilton thereby creating a strong sense of entry to the wider Kennet Island site. The building footprint can be delivered whilst creating a positive landscape setting. The design of the proposed 23 unit scheme has also been reviewed and discussed by the Reading Design Panel, which generally supported the scale and massing of the proposed development.</p> <p>Discussions are on-going with regards to the quantum of parking and the unit mix to be provided within the development. Elstree are confident that these matters can be agreed without impacting upon the quantum of development. The site is located along the A33 with para 6.2.1(e) of the current Local Plan stating that "the environs of the A33 and the Basingstoke Road will be enhanced to provide an attractive entrance into Reading, with densities along the A33 corridor increased to make good use of increased accessibility" whilst the Partial Review is further seeking to promote higher densities in such locations through H2: Density and mix. A development of 23 units will fall in line with this aim for increased densities that reflect the accessibility of the site.</p> <p>Overall then, in assessing the above planning considerations relating to this site, there is a compelling case to support the nomination of site Sou3 Former Sales and Marketing Suite, Drake Way for a residential development of 23 units. Finally, there are not considered to be any issues that would prevent this site from coming forward for development in the short term.</p>	Agreed. This site forms a development allocation in the Local Plan Partial Update, with 23 dwellings forming the upper end of the range.

<p>Savills (OBO BOC)</p>	<p>N/A</p>	<p>Several additional sites in South Reading have been identified as possible allocations. BOC raise concerns regarding nominated site Sou2 'Tunbridge Jones, Cradock Road'. This site would be located approximately 300 m from the existing BOC site at Rose Kiln Lane.</p> <p>The Cradock Road site would be located in a predominantly industrial area and is not therefore likely to be appropriate for residential development. According to adopted policy EM2 'Location of New Employment Development', the Cradock Road site is situated in the North of Basingstoke Road Core Employment Area (EM2e). This policy states that non-employment uses should only be located in such areas if they support the area's economic function and they do not result in a loss of employment land. The proposed residential allocation would therefore be contrary to adopted policy.</p> <p>As part of this consultation, question 25 asks "Do you have any comments on how policy EM2 should be updated?". Consultation documentation states that "there may be boundary changes proposed" to Core Employment Areas however "at this stage, it is not possible to outline what those changes would be". BOC consider that the boundary of the boundaries of site EM2e should not be altered.</p> <p>The Council acknowledge that the site is surrounded on all sides by existing commercial and industrial uses which would have significant amenity implications for any residents. Should allocation SR3 be developed for residential development, the Cradock Road site would still be surrounded by factories on three sides and would therefore form a disconnected 'limb' of residential development in an otherwise industrial area. The Council have also identified contamination as a potential issue / constraint of the site.</p> <p>It is highly likely that residential development at Cradock Road would not comply with adopted Policy CC8 as unacceptable living conditions would arise for new residents in the form of noise pollution from existing nearby industrial developments such as BOC. This development would also likely be contrary to adopted Policy EN16 as residential development is sensitive to the effects of noise pollution and the site will be subject to high levels of such pollution. Given the significant levels of existing noise, it would be a significant challenge to implement "adequate" mitigation measures to ensure no adverse impact.</p> <p>The Council sets out two alternative options for the site at Cradock Road. BOC support these alternative approaches, including development of the site for employment/industrial uses, which would be more appropriate given the site's location in a Core Employment Area.</p> <p>Whilst BOC do not oppose the principle of new residential development in Reading, this development should be sustainably and appropriately located. Development should include sufficient noise mitigation measures where necessary to protect future residents from adverse amenity and health impacts associated with noise pollution from existing nearby industrial uses such as BOC.</p> <p>Given BOC's 24 hour operations at the Rose Kiln Lane site, accompanied by additional noises from other industrial sites in this Core Employment Area, it would be very challenging to fully mitigate against adverse noise impacts on residential development proposed on or directly adjacent to the Core Employment Area. This may result in complaints from future residents. Locating residential development away from this area and implementing sufficient noise mitigation measures will also act to protect BOC and other existing industrial users of the Core Employment Area from the risk of future noise restrictions.</p>	<p>Noted. The Tunbridge Jones site is not included as a development allocation within the Local Plan Partial Update, in part for these reasons.</p>
<p>Stantec OBO St Edwards Homes</p>	<p>N/A</p>	<p>Further to our comments above in relation to the spatial strategy, we support South Reading being a focus for development. South Reading is well connected to the town centre and surrounding area, with connectivity enhanced through the opening of Green Park train station in 2023. The area offers an opportunity to provide for development needs in an accessible location.</p>	<p>Noted. The site is not proposed to be included as an allocation for development within the Local Plan Partial Update. There is not considered to be a realistic prospect that additional residential</p>

		<p>To this end, we welcome the consideration of additional site allocations in South Reading, in particular land at Green Park Village which is promoted by St Edward.</p> <p>Land at Green Park Village, Flagstaff Road (Sou4) The enclosed plans (drawing references 27429-Phase-003 and 27429-Phase-003a) illustrate a residential development on the site comprising up to 50 new homes (including affordable homes), community space, open space and associated parking and infrastructure. The development will form an addition to the established and growing community at Green Park Village, benefitting from easy access to the amenities and facilities already in place as well as good transport connections to the wider area.</p> <p>St Edward will utilise their unique set of placemaking and placekeeping skills to deliver a high-quality development which will complement and enhance the wider Green Park Village, helping to cement the legacy of the development.</p> <p>The site is currently in use as construction compound. Development will enable a positive use of brownfield land, contributing to the wider Green Park Village and community as well as delivering much needed housing for Reading.</p> <p>The site is located within Flood Zone 2 and development proposals will be designed to address the risk of flooding on site. The site is located within the DEPZ. As noted above, St Edward are working with Emergency Plan specialists to ensure that any development would be supported by appropriate safety measures.</p>	<p>development can be accommodated in the Off-Site Emergency Plan and an allocation is not therefore considered to be suitable or deliverable.</p>
<p>Savills (OBO Sorbon Estates Ltd)</p>	<p>N/A</p>	<p>Re Site Sou1 – Reading Link Retail Park</p> <p>Since the submission of the Site as part of the 'Call for Sites' exercise, Sorbon has re-evaluated the site's potential for development.</p> <p>It is considered that in order to optimise and make the best use of this previously developed site, redevelopment of the site for residential development only ('Option 2'), (albeit with a greater number of homes considering a retail use is no longer required).</p> <p>In the context of 'Option 2' set out above, the Site provides an opportunity for an appropriate high-quality, landscape-led and attractive 'gateway' development to contribute towards the aims and aspirations of the LPPU. In particular, responding positively to the adopted Local Plan 2019 Vision and Objectives to utilise previously developed land to deliver as many homes as possible, including affordable housing.</p> <p>The supporting Vision Document [document attached separately with representation, titled 'Reading Link Gateway'] sets out how the Site has the potential to deliver a range of housing for at least 240 homes, with the capacity for more, depending on the scale and housing mix provided. An illustrative masterplan is also included in the document which demonstrates, having regard to the Site's constraints and opportunities, how a high-quality apartment-led scheme of approximately 240 homes, with approximately 50% being family-sized 3+ bedroom maisonettes could be accommodated on the site. However, it is important that any policy wording that would be attached to the allocation in the LPPU in terms of mix and quantity is not set out prescriptively. It needs to be sufficiently flexible to take into account up-to-date sitespecific circumstances and any viability considerations, at the point of the detailed design. This is particularly important in seeking to optimise density, particularly in light of the borough's overall increasing housing need.</p> <p>This illustrative option is provided over a range of building heights and typologies that respond positively to the</p>	<p>Noted. Reading Link Retail Park is proposed to be included as a development allocation within the Local Plan Partial Update for residential development without the commercial element.</p>

		<p>surrounding urban area. It is envisaged that there is an opportunity for lower scale 3 to 4-storey buildings that front onto the blue and green network to the north and west, building to 5 and 5 storeys through the middle, and rising to 7 storeys on the A33/Rose Kiln Lane frontage, as part of this key 'gateway' location. As set out in the Vision Document, a development of this scale would fit well into the surrounding context and respond positively to the grain of other residential developments in proximity along the A33 corridor (such as Riverside View, which is built up to 8 storeys).</p> <p>Given Sorbon's control over the adjacent Holy Brook Meadow, the Site also represents a unique opportunity for residential development on the edge of the town centre to link into and 'open up' areas of the green open space to the local community; with footpath connections and increased connectivity into the existing Public Right of Way (PRoW) network. There would be the opportunity to conserve and enhance the surrounding landscape, drawing green infrastructure into the Site.</p> <p>It is noted in the SA that the Site scores well against the Sustainability Objectives. It is identified as a significant opportunity to meet housing needs by utilising previously developed land and also has significant positive effects on encouraging sustainable travel, acknowledging that the Site is 'on the edge of the town centre'. In this context, the Site is located in a key location to promote and connect to the cycle network. It is located adjacent to the 'strategic' shared surface cycle path adjacent to the A33 serving the Town centre, and also the 'local' route to the north on Rose Kiln Lane. It is also adjacent to the 'leisure' routes that run to the west across the meadows and only 250m south of the 'orbital' National Cycle Network (NCN)(Route 422) at Berkeley Avenue. Therefore, the site is extremely well-placed to promote cycle use and connectivity to the network. It should also be noted that whilst the Site is currently in retail use, it is neither allocated nor being promoted for these purposes. The buildings are old and the use is no longer making efficient use of the land. The Site is out of the town centre, where sequentially, retail uses would generally be avoided. Paragraph 126 of the NPPF requires policies to reflect changes in the demand for land. In addition 127 of the NPPF identifies that a positive approach should be taken for proposed alternative uses of land which are currently developed, but not allocated for a specific purpose in the plan.</p>	
Woodland Trust	N/A	Rose Kiln Lane, Cradock Road, Drake Way and Flagstaff Road could benefit from increased tree canopy cover: as noted in the site constraints, existing trees at Rose Kiln Lane and Hexham Road merit retention.	Noted. This will be required by proposed natural environment policies within the Local Plan. Existing trees at Rose Kiln Lane and Hexham Road are noted within the proposed policies.
M Langshaw	N/A	This is such a good idea, supporting biodiversity and alleviating possible flood risk.	Answer is noted. No changes required.
Iceni (OBO TT Group)	N/A	TTG considers that in addition to the Sites already identified for allocation in the South Reading area, the Site which is the subject of this letter should be taken forward and considered for a site allocation, on the basis of the information included in this letter and the Call for Sites form. [11 Basingstoke Road]	Noted. This site is included within the Local Plan Partial Update.

Additional representations submitted via email regarding Policy SR4

Respondent name	Comments	RBC Officer Response
ICB	<p>The ICB has no particular concern about the proposed removal to some of the sites from the policy to reflect the latest developments of those sites.</p> <p>Given that the uses and the scale of development are only indicative at this stage, the ICB has no particular concern to the sites identified from the call for sites exercises. Notwithstanding, the ICB considers that those new identified sites will inevitably have additional pressure to the existing primary healthcare provision.</p> <p>The existing supporting paragraph 6.3.16 to Policy SR4 generally sets out that some sites identified for housing may have the potential for community uses including healthcare facility. The ICB considers that the wording of the supporting paragraph is not precise. If the Council is intending to introduce community uses including primary healthcare facilities to</p>	<p>No change proposed. It is not clear which site is intended to be subject to the change, and matters such as mitigating infrastructure impacts unless there are sites specific needs are more appropriately dealt with by a general policy rather than individually from site to site.</p>

	<p>some of the sites, the Council should liaise with the relevant providers at a minimum to work out the most appropriate way to place those uses which can be operationally and financially viable.</p> <p>The situation is more complicated in primary healthcare provision as GP practices are privately owned. If the Council is intending to accept the ICB's suggestion as above, the ICB is happy to work with the Council, site promoters and GP representatives to explore the opportunities for such provisions. The ICB also welcomes site promoters to undertake any feasibility studies for the commissioning of the facility. The findings of the studies can help inform the wording of this Policy, including whether an onsite primary healthcare provision can be identified, or an offsite mitigation measure should be provided.</p> <p>The ICB has the following recommendation on the wording of Policy SR4: <i>The following sites will be developed according with the principles set out in this policy:</i> General principles for all sites including residential use. Development should:</p> <ul style="list-style-type: none"> • Address the impacts on the existing infrastructural capacity including primary healthcare provision. <p>The ICB also has the following recommendation on the wording of supporting paragraph 6.3.16 to Policy SR4: The Council should work with relevant infrastructural providers and all developers to identify the onsite provision of community uses, including healthcare or education. Other offsite mitigation measures should be provided where appropriate if onsite delivery is not financially or operationally viable.</p>	
Thames Water	<p>Site Name: Site Sou1: Reading Link Retail Park Net gain to system (/day): 165000 Net foul water increase to system (l/s): 1.91 Net property equivalent increase – waste: 154 Net increase in demand (l/d): 74600 Net increase in peak demand (l/s): 2.59 Net property equivalent increase – water: 213</p> <p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	Noted. Any site-specific concerns are factored into the proposed policy allocation.
Environment Agency	Site Name: Reading Link Retail Park	Noted. The need to take account of flood risk is highlighted within the proposed allocation.

	<p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): Narrow band of FZ2 on west of site. Holy Brook 9m from site, along northern boundary. Coastal and floodplain grazing marsh adjacent to site. Principal bedrock aquifer, secondary superficial aquifer A and Presence of investigated site approx 17m from site</p> <p>Chosen option and requirements: The red line boundary is on the edge of the 5% AEP and 3.3% AEP extents so development could be considered incompatible with the flood zone. The site is just within the 1% AEP plus climate change extent so there could be an increase in risk elsewhere. The site is close to the main river so development on this site would likely be flagged as needing a Flood Risk Activity Permit. This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use. We would endorse that sites are fully investigated following LCRM guidelines. Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</p> <p>Opportunities: There is an opportunity to restore the bank of the Holy Brook at this site.</p>	
Thames Water	<p>Site Name: Site Sou2: Tunbridge Jones, Cradock Road</p> <p>Net gain to system (/day): 64627.2</p> <p>Net foul water increase to system (l/s): 0.75</p> <p>Net property equivalent increase – waste: 60</p> <p>Net increase in demand (l/d): 33600</p> <p>Net increase in peak demand (l/s): 1.17</p> <p>Net property equivalent increase – water: 96</p> <p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	Noted. No change needed, as this site is not to be taken forward in the Local Plan Partial Update.
Environment Agency	<p>Site Name: Tunbridge Jones, Cradock Road</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ1. Secondary bedrock aquifer A. Historic landfill on site and Presence of investigated site</p> <p>Chosen option and requirements: Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK (www.gov.uk)</p> <p>This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use. We would</p>	Noted. No change needed, as this site is not to be taken forward in the Local Plan Partial Update.

	<p>endorse that sites are fully investigated following LCRM guidelines. Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</p>	
Thames Water	<p>Site Name: Site Sou3: Former Sales and Marketing Suite, Drake Way Net gain to system (/day): 24591.6 Net foul water increase to system (l/s): 0.28 Net property equivalent increase – waste: 23 Net increase in demand (l/d): 0 Net increase in peak demand (l/s): 0 Net property equivalent increase – water: 0</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	<p>Noted. Any site-specific concerns are factored into the proposed policy allocation.</p>
Environment Agency	<p>Site Name: Former Sales and Marketing Suite, Drake Way</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ2. Main river Foudry Brook 5m to west of site. European Eel migratory route. site boundary includes southern end of large pond. Secondary bedrock aquifer A. historic landfill 11m from site. Potential contamination from previous sewage works use and Presence of investigated site.</p> <p>Chosen option and requirements: Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK (www.gov.uk) It is in Flood Zone 1 and close to the main river so development on this site may need a Flood Risk Activity Permit. This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use. We would endorse that sites are fully investigated following LCRM guidelines. Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</p> <p>Opportunities: This area has a pretty natural bank and is a frequently used path, next to the Foundry Brook and there could be opportunities for enhancement. There is also an offline pond in that area, which could provide opportunities for enhancements and possibly linking to the river as a backwater.</p>	<p>Change proposed. The opportunities for enhancement of the frontage to the brook should be highlighted in the policy.</p>
Thames Water	<p>Site Name: Site Sou4: Site at Green Park Village, Flagstaff Road Net gain to system (/day): 0 Net foul water increase to system (l/s): 0 Net property equivalent increase – waste: 0 Net increase in demand (l/d): 17500 Net increase in peak demand (l/s): 0.61 Net property equivalent increase – water: 50</p> <p>Water response: On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact</p>	<p>Noted. This site is not proposed to be taken forward as a development allocation in the plan.</p>

	Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
Environment Agency	<p>Site Name: Site at Green Park Village, Flagstaff Road</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ2. Secondary superficial aquifer A, secondary bedrock aquifer A, railway 45m from site. Boundary includes historic landfill and Presence of investigated sites.</p> <p>Chosen option and requirements: It is in Flood Zone 1 and outside the 1% AEP plus climate change extent. We understand this area is currently being used a temporary compound area and with the previous changes of use it is possible ground levels will have changed. This would need to be assessed with the potential for updated modelling needed to consider recent ground levels changes/different flow routes. Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK (www.gov.uk) This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use. We would endorse that sites are fully investigated following LCRM guidelines. Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</p> <p>Opportunities: There is a pond near the site and some ordinary watercourses a bit further away. There could be opportunities to enhance the pond area</p>	Noted. This site is not proposed to be taken forward as a development allocation in the plan.
Thames Water	<p>Site Name: Site Sou5: 2 Hexham Road</p> <p>Net gain to system (/day): 0</p> <p>Net foul water increase to system (l/s): 0</p> <p>Net property equivalent increase – waste: 0</p> <p>Net increase in demand (l/d): 0</p> <p>Net increase in peak demand (l/s): 0</p> <p>Net property equivalent increase – water: 0</p> <p>Water response: 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.</p> <p>Waste response: The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.</p>	Noted. This site now has planning permission and is not therefore included as a development allocation.
Environment Agency	<p>Site Name: 2 Hexham Road</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ1. Unproductive bedrock aquifer.</p> <p>Chosen option and requirements: Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK (www.gov.uk)</p>	Noted. This site now has planning permission and is not therefore included as a development allocation.

Q. 73 Do you agree with the proposed update to policy SR5 to reflect potential proposals at Kennet Meadows?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Reading Climate Action Network	Y	I think there is significant potential to improve the biodiversity at Kennet meadows through these proposals.	Noted. No change needed.
Tricia Marcouse	Y	Very definitely	Answer is noted.
The Woodland Trust	Y	Yes support the inclusion of biodiversity as a goal for the wetland restoration. Riparian trees bring multiple benefits for water quality, natural flood management and biodiversity.	Answer is noted. No changes required.

Additional comments submitted via email regarding updates to policy SR5

Respondent name	Comments	RBC Officer Response
The Kennet & Avon Canal Trust	Details are awaited but the concept is of considerable interest. It is assumed that use of the area will remain quiet, that the area will remain an attractive wildlife habitat during site preparation and that site use will strengthen the objective of keeping the Kennet Meadow as public open space and a viable habitat for wildlife . Upgrading of footpath 06 (and possibly footpath 07) to create an attractive footway/cycleway and/or boardwalk) could facilitate pedestrian and cycle access to such a wetland. It would also reduce the difficulties of reaching the open areas along the canal near Fobney Lock from Coley and Southcote	Noted. These issues will be addressed at application stage and are supported by the policy which states "use of the area for low-intensity leisure and recreation will be supported."

Q. 74 Do you agree with the proposed changes to the existing allocated sites in West Reading and Tilehurst? Do you want to see any other changes?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	Protect green space, provide 5G!	No change needed. Information on sites in West Reading and Tilehurst can be found within chapter 12 of the LPPU Scope and Content document.
Dave Newnham	Other	I don't agree with this, This area should be protected as green space. Not doing so shows no commitment/responsibility to a sustainable future for our dwindling flora and fauna. Taking away green spaces is also bad for the overall well being of local people, it is a fact that having nature around us is good for us.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Dave Wraight	Other	I would advocate that the armour Hill and Kentwood sites are removed from the housing allocation and retained as local green space	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so

			designation of the full area is not considered appropriate.
Jennifer Susan Cottee	N	I have explained in a separate email letter my reasons for saying that site WR3s and WR3t should be removed from the list to sites approved for development. Both have been subject to gross mismanagement and unauthorised changes.	Noted. Please see response to those comments.
The Woodland Trust	Other	As no longer being allocated for housing, this area should be prioritised for nature recovery and woodland creation, including extending existing wooded areas at Great Lea Common and Grazeley Court (Priority Habitat Inventory - Deciduous Woodland).	Noted. This is outside the scope of the Local Plan, but should an application come forward on this site, it would be considered against existing natural environment policies within the Local Plan.
The Woodland Trust	Other	The sites at Portman Road, Moulsoford Mews, and Dee Road could benefit from increased tree canopy cover.	Noted. This will be required by proposed natural environment policies within the Local Plan.

Additional representations submitted via email regarding sites in West Reading and Tilehurst

Respondent name	Comments	RBC Officer Response
Ridgepoint Homes	<p>Re Land at Portman Road, RG30 1AW The site comprises the northernmost section of the Tesco car park which is now surplus to Tesco's requirements. Housing need is calculated based on a national standard methodology which applies a 35% uplift to the local authorities that cover 20 largest urban areas in England, including Reading. This results in a need for 877 homes per year in Reading up to 2041, a substantial increase from the existing plan figure of 689 per year. This increased housing need will therefore require Reading to identify new sites for development.</p> <p>A full planning application for residential development comprising 80 apartments was submitted to Reading Borough Council in July 2023 (ref: 231041) in order to make more efficient use of this parcel of the existing Tesco car park which is now surplus to requirements. The full planning application is currently under consideration and a decision is anticipated in April 2024.</p> <p>As part of this planning, a full suite of assessments and surveys has been undertaken to include ecology, trees, flood risk & drainage, noise, geo-environmental and highways.</p> <p>The development of the site for 80 dwellings is therefore achievable. The site is currently under the single ownership of Tesco Stores Limited and Ridgepoint Homes have a legal option to purchase the land. The site is therefore available for development.</p>	Change proposed. This site is proposed to be included as an allocation for residential development, albeit the identified indicative capacity is lower than proposed here.
Thames Water	<p>Site Name: Site Wes1: Land west of Milford Road Net gain to system (/day): 47124 Net foul water increase to system (l/s): 0.55 Net property equivalent increase – waste: 44 Net increase in demand (l/d): 24500 Net increase in peak demand (l/s): 0.85 Net property equivalent increase – water: 70</p> <p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to</p>	Noted. This site is not proposed to be taken forward as a development allocation.

	<p>accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	
Environment Agency	<p>Site Name: Land west of Milford Road</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ2 55m to railway lines. Principal bedrock aquifer and Presence of investigated sites to west of site.</p> <p>Chosen option and requirements: The site is in Flood Zone 2. The site is within the 1% AEP plus climate change extent so there could be an increase in risk elsewhere because level for level floodplain compensation may not be achievable. This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use. We would endorse that sites are fully investigated following LCRM guidelines. Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</p>	Noted. This site is not proposed to be taken forward as a development allocation.
Thames Water	<p>Site Name: Site Wes2: 72 Berkeley Avenue Net gain to system (/day): 23562 Net foul water increase to system (l/s): 0.27 Net property equivalent increase – waste: 22 Net increase in demand (l/d): 12250 Net increase in peak demand (l/s): 0.43 Net property equivalent increase – water: 35</p> <p>Water response: On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	Noted. Any site-specific concerns are factored into the proposed policy allocation.
Environment Agency	<p>Site Name: 72 Berkeley Avenue</p>	Noted. No change needed.

	<p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ1. Secondary superficial aquifer A, secondary bedrock aquifer A</p> <p>Chosen option and requirements: Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK (www.gov.uk)</p>	
Thames Water	<p>Site Name: Site Wes3: Land at 132-134 Bath Road Net gain to system (/day): 29620.8 Net foul water increase to system (l/s): 0.34 Net property equivalent increase – waste: 28 Net increase in demand (l/d): 15400 Net increase in peak demand (l/s): 0.53 Net property equivalent increase – water: 44</p> <p>Water response: On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	Noted. Any site-specific concerns are factored into the proposed policy allocation.
Environment Agency	<p>Site Name: Land at 132-134 Bath Road</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ1 Ordinary water course (drain) along north of site. Much of site subject to potential contamination. Secondary bedrock aquifer A and Presence of investigated adjacent to East of site.</p> <p>Chosen option and requirements: It is in Flood Zone 1 and outside the 1% AEP plus climate change extent. The site is next to an ordinary watercourse so permission may be required from the Lead Local Flood Authority. There is a very small ditch/drain on the site, which may be culverted. If it is, there needs to be the opportunity to de culvert it in the future provided. Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK (www.gov.uk) This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use. We would endorse that sites are fully investigated following LCRM guidelines. Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</p>	Noted. No change needed.
Thames Water	<p>Site Name: Site Wes4: Southcote Library, 234 Southcote Lane Net gain to system (/day): 0 Net foul water increase to system (l/s): 0 Net property equivalent increase – waste: 0 Net increase in demand (l/d): 0</p>	Noted. Any site-specific concerns are factored into the proposed policy allocation.

	<p>Net increase in peak demand (l/s): 0 Net property equivalent increase – water: 0</p> <p>Water response: 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.</p> <p>Waste response: The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.</p>	
<p>Environment Agency</p>	<p>Site Name: Southcote Library, 234 Southcote Lane</p> <p>Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ1. Secondary bedrock aquifer A</p> <p>Chosen option and requirements: Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK (www.gov.uk)</p>	<p>Noted. No change needed.</p>
<p>TOWN</p>	<p>I write on behalf of the owners of land east of Pincents Lane, Tilehurst, in response to this consultation.</p> <p>Whilst the site (as indicated on the plan attached to this letter) is within the administrative area of West Berkshire Council, it is immediately adjacent to the Greater Reading urban area as shown in grey on Figure 1.1 of the adopted Reading Local Plan 2018. The housing and employment markets do not conveniently follow local authority boundaries in this part of the country and Reading is the dominant attractor in the eastern part of West Berkshire. Planning policy should to work within and across the relevant housing market areas, through the duty to co-operate and collaborate with their neighbours rather than ignoring or actively discourage them. With development, our site could function positively as part of that Greater Reading urban area not taking advantage of its existing infrastructure in both administrative areas but also offering much needed family housing.</p> <p>In preparing these representations, we have assumed that the December 2023 version of the NPPF, and specifically its amendments to Paragraph 11 and Chapter 3, will apply.</p> <p>In our representations on the West Berkshire Local Plan Review (WBLPR), now at Examination, we suggest that the WBLPR ignores the Reading economy and housing market in the eastern part of WB and that this stifles an obvious opportunity for sustainable development as well having a limiting effect on both markets..</p> <p>Similarly, we consider that the Reading Borough Local Plan should recognise the potential of sites which are sustainably located close to, but outside, its borders in an effort to reduce travel time and to support the City's economy. Market housing delivered on sites such as ours would be available to those needing to live in the area - including family homes & gardens which are in such short supply in Reading. Such an approach would reflect the requirements of Paragraph 16a)-c) of the NPPF. The reference at paragraph 3.11 should be strengthened to reflect this symbiotic relationship across local authority boundaries.</p>	<p>Noted. Any site-specific concerns are factored into the proposed policy allocation.</p>

Q. 75 What is your view on the suggested changes to sites WR3s and WR3t?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Katie Jenks	N/A	I strongly oppose such development in an area with recognised protected species using it for breeding.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Luke Dickens	N/A	These sections of land provide vital habitat for local natural wildlife in an otherwise largely urban area of Reading. I believe this important green space is also crucial for mitigating the effects of pollution locally and improving air quality in Tilehurst. I would therefore urge the council to change the designation of the land to local green space	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Jessica Irwin	N/A	It is really important that the designation of this land is changed from 'suitable for residential development' to local green space. It is an area of diverse wildlife in the middle of Tilehurst. It should be protected as such. There are precious few green areas in and around Reading and so it is really important to retain this land to provide a safe and peaceful environment for the animals and birds that live there. It is also so important for the people of Tilehurst to have green spaces to visit and walk in. Whilst I appreciate that new houses are required in Reading, there are other areas which would be more suitable and which would not cause such devastation to the natural environment and wildlife living there.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Heather Harrison Lawrence	N/A	This area should remain green for the environment and local community.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Gillian Andrews	N/A	To reject the proposed housing development of this site, for it's value to the community as an area of natural beauty, enhancing the well-being of the many who enjoy its obvious benefits. I believe it should continue remaining as a Local Green Space, maintaining its established historical significance.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so

			designation of the full area is not considered appropriate.
Louise Corderoy	N/A	These areas MUST be protected against development to maintain the character of the area and provide a green-lung and wildlife haven for future generations. Once developed it can never be reversed and will be to the detriment of everyone however wealthy- or poor in the vicinity.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Debbie Sadler	N/A	It is my firm view that Reading does not need more sites to build houses on. This is a short term aim with negative long term consequences. the current sites (particularly brown sites) need to be repurposed and used for housing so that important green space, with all its health and wellbeing and climate benefits can be maintained. Adding more houses on a green site is simply wrong. More people are working from home so the local green environment is more important than ever. We need to maintain and protect it. The land at Kentwood Hill and Armour Road should be designated Green Space and should not be developed for short term commercial gain. I repeat the destruction of these locally important green spaces is not required to meet housing requirements and will simply lead to other more intractable and significantly detrimental impacts in terms of population health and loss of biodiversity.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Andrew Thompson	N/A	I would very much welcome these sites to be designated as LGS. My reasons are outlined in more detail in my response to question 15. Broadly, my reasons are those of redressing the imbalance of urban development and the decline of nature, building communities not just housing, and giving greater emphasis to peoples' wellbeing.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Tanya Talbot-Butler	N/A	We need to maintain the dwindling green space in our city. WR3s and WR3t should be allocated as Local Green Space and left to the thriving wildlife already present.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Maisey Booth	N/A	We are against the idea of any building taking place on the land surround the allotments on Kentwood and Armour Hill. We walk regularly through this area. This land allows for wildlife to flourish. We have seen numerous birds, insects, hedgehogs and bees on our daily walks. It is not only a haven for wildlife in an already built up area but also provides an area of tranquillity for all ages in our family. We already suffer flooding in our property every winter though overload of water entering the Thames water drainage system...if this land were to be build on that would be more waste water generated and accessing an already overloaded drainage system which is having huge impacts at the bottom of the hill. As a long standing resident of Reading Borough Council, having always paid our council tax and respected the environment around us, we hope RBC put the needs of residents and wildlife living in the area are the forefront of their decision making!	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.

George Albert Solly	N/A	These sites should be redefined as a Local Green Space to give the adjoining land the spatial capacity to be effective as a area of biodiversity central to the needs of the local community, its wildlife and tranquillity.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Kathryn Solly	N/A	This wildlife area has remained untouched until recent interference by the landowners. It should be designated as a Local Green Space or better still become a protected wildlife reserve in order that the wildlife and the community benefit. With such huge increases in house building in Reading such area are going to become the 'lungs' of the local environment and perhaps one of the few places local people will be able to escape their high-rise living with their children. There is lots of research which shows the importance of nature connectedness for children and how it supports their growth into environmentally aware citizens of the future.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
David Pierce	N/A	I agree that they should both be removed from the plan and allocated as green space - please see my answer to Q15. I agree more houses are required in the area and West Berks have already grabbed a load of boundary land in the Sulham area. It would be great if RBC looked after their own where they can. I do wonder how much RBC have assessed whether there is a bulge of home ownership in the Tilehurst area care of the "baby boomers" like my parents who have lived in the same houses for 60 years+ and, sadly, will not be there for much longer. Its's often discussed (however darkly) amongst my generation of 1960s kids that there will soon be a glut of houses on Overdown, Fairford, Pierces Hill, Cotswold, Westwood Road etc when our parents (who have effectively blocked 3 generations out of these houses) start, frankly, dying. I can't recall how many houses were to be built on these sites but if it was, say, 100 I can probably name 100 of my 1970s school cohort who's parents are still in the area and will (in the next 5 years) likely free-up a load of high quality 3 bed homes.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Sally Cooke	N/A	It would be a travesty to build on these areas (Tilehurst allotments - Armour Hill and Kentwood Hill). This land was left to the people of Tilehurst approximately 200 years ago, never to be built upon. The educational advantage this gives to children is immense here and the clean air is self explanatory. The numerous trees and wildlife is definitely something we cannot ignore, together with the numerous protected insects (48 varieties - silk worms, etc..) which have made these allotments their home over the years. It is also an extremely great place for our elderly community to go to for their physical and mental wellbeing, and the young families who have these allotments obtain a wealth of knowledge from them which can continue on through the generations. The surplus produce is also distributed to foodbanks throughout the year together with stalls at local events, fetes, etc., and is ongoing. From this you can see that this is an extremely useful green space for the community and ongoing generations to come and may it continue.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Tilehurst Allotment Society	N/A	The land at Kentwood Hill (WR3s) and Armour Rd(WR 3t) should be given Local Green Space status and thus be protected from development . Any development on the sides of the Tilehurst allotments would: 1. Diminish natural charm / ambience of the allotment site eg spoil splendid view of Thames valley, the setting for Kenneth Graham's 'Wind in the Willows ' . 2. Reduce the aesthetic appeal of the site eg reduction of surrounding trees and bushes and wildlife, especially birds . 3. Tree and plant loss on the perimeter would diminish insulation to the plots and surrounding homes from noise and air pollution.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.

		<p>4. The outskirts of this site have been the green lungs of the area and nearby houses since historical records commenced.</p> <p>5. A important protected area for animals species would be lost eg badgers, hedgehogs, kites, owls, slow worms and bats .</p> <p>6. Covid has shown that residents need somewhere to exercise, refresh and find a sense of belonging in an 'green' environment. Also, the multitude of flats in Reading with 'postage stamp ' gardens and flats without gardens, accentuate this need for green space, not a 'tearing down'.</p> <p>Despite the pressing houses shortage and the pressure of government quotas , this 'jewel in the Reading's crown' should be preserved.</p>	
Fiona Sutherland	N/A	These sites should be kept as local green space. The sites are a valuable wildlife haven. Small wild deer live in this area.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Lucy Bellman	N/A	<p>Do not build on and destroy this piece of land.</p> <p>It should remain a natural habitat and breathing space for endangered species and wildlife. Badgers Bats slow worms</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Bernard Patrick Fyans	N/A	On the basis that the sites become Local Green Space, such changes seem unnecessary.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Anthony Acka'a	N/A	I agree and think redevelopment for family sized homes would be better than keeping it as it is	Change proposed. Most of the allocations are proposed to be retained, albeit that WR3s would be reduced in size to exclude the areas of greatest biodiversity significance.
Carolyn Ribbons	N/A	<p>These areas should be exempt from building because they are vital wildlife areas and provide a wildlife corridor that cannot be replicated if lost.</p> <p>The allotments in Armour Hill provide refuge, not only for people (they really help in helping mental health issues) but they are also refuges for wildlife. The allotments are home to Mountjac deer, badgers, foxes.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so

			designation of the full area is not considered appropriate.
J & G Hiscock	N/A	<p>It is vital that the land at Kentwood and Armour Hills surrounding the allotments is saved and free from any residential development.</p> <p>It should be designated as LOCAL GREEN SPACE and protected from any development.</p> <p>The land has been enjoyed for generations and is still greatly valued and enjoyed by the local community today. Not only for the peace and beauty it offers with wildlife, birds and animals, plants and trees but a place away from the hustle and bustle of traffic and daily life. Children can play safely, people can walk their dogs where for some they may not have gardens of their own so it is their haven.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
Jenny Cottee	N/A	<p>I think neither site WR3s nor WR3t should be allocated for development in the updated local plan. On the contrary both sites should both be designated as Local Green Space</p> <p>The boundaries of both WR3t and WR3s include land currently used as allotments, despite protection under the current Local plan. Site WR3t includes facilities integral to the allotment site: the vehicular access to Armour Hill, the allotment carpark and access track to various plots. Recently the landlord informed plot-holders of their plan to take areas of land out of cultivation as allotments and use this land to replace facilities lost when/if WR3t is developed. This consequential loss of allotment land was not the intent of RBC or the various planning inspectors involved over the years. The planning protection provided to the allotments by the current Local Plan is inadequate.</p> <p>Land in the NW corner of WR3s has been well-cultivated allotment plots for years so only part of WR3s should be legitimately considered for development.</p> <p>To establish discipline in the planning and implementation processes unambiguous boundaries should be securely defined. It would restore trust if the boundaries matched land use.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p> <p>The provisions in WR3t around ensuring that access and parking is not reduced should be strengthened to ensure that allotments are not lost to accommodate facilities displaced from the development site.</p>
KKG	N/A	<p>We wholeheartedly support the suggested change of status of these sites from 'suitable for residential development' to protected 'Local Green Space.'</p> <p>Keeping the land green as opposed to developing it helps RBC towards meeting its Climate Emergency objectives that are the common theme behind the wording changes deemed necessary to central parts of this LPPU.</p> <p>Changing designation is clearly in line with RBC policy EN12 – Biodiversity and the green network. Existing protected Areas of Biodiversity Interest are connected to WR3s and WR3t directly. Whilst the current wording with regards to WR3s and WR3t mentions that wildlife corridors must be provided we believe that WR3s and WR3t as they exist today are crucial for the biodiversity in the area and that they are the land areas where the wildlife actually lives – using the adjacent sites of Arthur Newbery park and the bottom of Armour Hill/ Kentwood Hill solely as foraging and hunting ground, given the extensive use of these sites by people and their dogs during the day. WR3s and WR3t are vital to the life of the West Reading Woodlands, one of only two of RBC's Local Nature Recovery Strategies & Biodiversity Opportunity Areas.</p> <p>Including WR3s and WR3t as LGS is clearly also in line with policy EN14 – Trees, hedges, and woodland. A TPO had been in place since September 2000 (so over 21 years at the time of review) on 12 specific individual trees, 2 groups of trees and 5 areas of trees. Of these, WR3s has Area 1 within it, parts of Area 2 and 3 and 4 of the individual trees. WR3t has one group and one individual within it. The majority of the roadside perimeters of the sites are made up of dense trees and mature hedgerows. Many of the trees within WR3s would be considered veteran; there are sufficient old fruit trees (allowed to grow since allotment plot holders were evicted</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p> <p>In terms of demonstrating the amount of homes that can be delivered elsewhere, the numbers quoted for many of the new and existing sites are well above the capacity of those sites to accommodate development, in some cases (such as Sapphire Plaza and Reading Bridge House) very significantly. In addition, in the case of CR12a and CR13c it is difficult to see how the right hand column is derived from the change in dwelling numbers.</p> <p>In any case, the calculation do not take account of the necessary extension of the plan period by 5</p>

	<p>from WR3s some 40 years ago) that the habitat in WR3s can be counted as mature orchard (including juglans sp. malus spp., prunus spp.), there are also many examples of mature ash trees with no die back.</p> <p>Also to be considered is the impact that any development would have on the Major Landscape feature contained within WR3s, “the West Reading Wooded Ridgeline” recognised for its value and characterised by its amenity value, largely as a result of its collective tree cover. It is hard to imagine how building 80 houses could be done without impacting this Major Landscape Feature even with the most diligent developer and bulldozer operatives. Changing the designation of sites WR3s and WR3t and thus protecting the land in its current state would also help RBC meet some of its objectives within its Sustainability Framework. Objective 4 seeks to minimise consumption of, and reduce damage to, undeveloped land. Sites WR3s and WR3t alongside all other parts of land owned by TPLC have always been green field/ undeveloped as can be evidenced from studying Ordinance Survey maps back to 1870. The only exception to this would be unauthorised development within the Builders Yard but this is in varying states of disrepair and provides evidenced homes for foxes and bats as well as foraging ground for deer and badgers. Objective 7 details valuing, protecting, and enhancing the amount and diversity of wildlife and 8 seeks to avoid adverse effects on designated wildlife sites. 22 of the protected species/ species of special concern listed in RBC’s Biodiversity Action Plan have been officially recorded with TVERC in 2023 from observations purely from the edges of the land. Well over 100 different species have been recorded since we began collecting evidence in 2022.</p> <p>Objectives 1, 2 and 9 could also be helped by turning the sites into LGS. Objective 1 - any house building will reduce the mass of flora absorbing CO2 and other greenhouse gases from Kentwood and Armour Hill. Objective 2 - there are a number of underground streams that run through WR3t, and this area has historically been used to grow watercress. Building here would only increase the flooding seen at the bottom of Armour Hill every time it rains as well as potential landslides from the hill as the gradient on this section is very steep. You only have to compare the aerial footage of the area during the summer to witness the marked difference in colour between the verdant green of WR3s and WR3t compared to the brown grass of Victoria Rec and Arthur Newbery Park to see the value the area provides local wildlife during droughts. Objective 9 relates to clean environments – protection would allow the continued “green lung” to act for local residents as well as being a key future objective for KKG if we’re allowed access to the land to clear it of accumulated litter and fly tipping.</p> <p>We appreciate there is a recognised housing need in Reading. By analysing the volumes included in the Partial Update however this increased need can be met with the additional sites proposed from the latest Call for Sites exercise as well as the included increased volumes in previously nominated sites across all sections of the Reading area.</p> <p>There are also current developments not included in the Local Plan or this Partial Update that will increase dwelling numbers across Reading. Examples in the local news include the proposed use of the Tesco car park on Portman Road, redevelopment of the Curzon Club and the completion of Chesters Place on Downing Road.</p> <p>The table below only includes locations where dwelling numbers were specified (using an average where a range was specified) but there are potentially large-scale developments mentioned in the update that would also meet need (Apex - CR11d; Aquis - Cen1; Central Library - Cen2, Crowne Plaza - Cen4; Hexham Road - Sou5).</p>	<p>years and the need to find an additional 5 years of supply.</p> <p>It is recognised that there are particular sensitivities within the sites, even with the exclusions proposed, but the policy criteria around protecting important trees, views, green links and a landscaped buffer to the main roads are considered to cover this matter.</p>
--	--	--

Site Code	Site Name	Reason for Change	Change in Dwelling Numbers	Vol
CR12a	Cattle Market	volume change	330-490 to 800-1200	705
CR13c	Forbury Business Park	volume change	190-285 to 430-450	339
Cen3	John Lewis	new		200
Cen5	Norman Place	new		240
Cen6	Reading Bridge House	new	300-400	350
Cen7	Tesco Extra	new	150-200	175
Cen8	Kennet Place	new		70
Cen9	Sapphire Plaza	new	250-400	325
Cen10	Reading College	new		45
Sou1	Reading Link	new		200
Sou2	Tunbridge Jones	new	72-96	84
Sou3	Drake Way	new		23
Sou4	Green Park Village	new		50
Eas1	Upper Crown St	new		46
CA1b	Reading Golf Club	volume change	90-130 to 223	113
W	West Reading	Detailed separately		268
			Average Increase	3233

The sites above are brownfield or infills except for the Reading Golf Club and WR3s and WR3t. Councillor David McElroy said, in relation to another greenfield site where planning is proposed, that RBC have identified that 13,000 homes could instead be built on the huge amount of brownfield space available in Reading. Looking specifically within the West Reading and Tilehurst area, we have the updates detailed below:

Site Code	Site Name	Reason for Change	Change in Dwelling Numbers	
WR3c	28-30 Richfield Avenue	change of use	loss of 50 - 80	-65
WR3e	Yemorary House	change of use	possible loss of 10 - 14	-12
WR3j	Moulsford Mews	volume change	max from 16 - 26, plus 10	10
WR3m	103 Dee Road	volume change	max from 50 - 54, plus 4	4
WR3o	The Meadway Centre	change of use	+258 residential	258
WR3s	Land at Kentwood Hill	change of use	41 - 62	-52
WR3t	Land at Armour Hill	change of use	12 - 18	-15
Wes1	Milford Road	new	+70	70
Wes2	72 Berkeley Avenue	new	+20-30 (could be up to 35)	25
Wes3	132-134 Bath Road	new	approx 30 (could be up to 44)	30
Wes4	234 Southcote Library	new	+15	15
			Effect of all changes	268

There is an increase in volumes of dwellings in West Reading and Tilehurst (albeit on a much smaller scale than in other parts of Reading) even with the deselection of WR3c, WR3e, WR3s and WR3t. There are current planning permissions granted by West Berkshire council that will also impact Tilehurst and West Reading numbers.

Obviously actual dwelling numbers will vary and not all sites offered up will be suitable for development however there are large scale movements in both the retail and commercial property markets with the move to hybrid working methods and online retail reliance. This must mean that, within the lifetime of this Local Plan, there will be many more (brownfield) sites becoming vacant and offered up for residential use in future Call for Sites exercises that can deliver the longer-term housing stock.

There has been discussion with respect to precedence for moving land from suitable for residential development to an LGS. This has obviously not happened within RBC as the Local Green Space and Public Open Space Background Paper from March 2018 stated:
"2.3.1 As LGS designation was introduced by Government in 2012, it is absent in existing Reading planning policy documents and is being proposed in this iteration of the Local Plan for the first time."

Logically therefore, as this is the first Partial Update where changes can be included for consideration, there will be no precedent within RBC to deallocate from residential development to LGS. There are however other removals from being suitable for residential development throughout the Partial Update (presumably due to landowner decision): for example, Yeomanry House.

Whilst LGS is a relatively new addition to the NPPF and changes can only be included when Local Plans are being updated, we have found examples of councils at a more progressed stage of their Local Plan updates that have designated LGS for sites that were previously earmarked for residential development. Sheffield County Council has approved the movement of a LWS to LGS away from suitable for residential development at a site

		<p>called Owlthorpe Fields and this is currently with the Planning Inspectorate for imminent final decision. CPRE London cited a case where the local neighbourhood plan was not finalised, but its LGS designations still carried weight. In Caterham, Tandridge, in May 2021, the planning inspector refused a proposed development as it would cause the partial loss of an LGS designated in the emerging neighbourhood plan. He said that “while this emerging plan has not yet been adopted, the identified conflict [with this policy] can be given significant weight”. In a similar vein, the Neighbourhood Plan of Maids Moreton was contested by local residents when the Parish Council declined to give LGS to an LWS. This was contested with the use of a consultancy (Urban Vision Enterprise) and the Examiner ruled in favour of the local residents and granted LGS status overruling the Parish Council.</p> <p>KKG fundamentally believe that WR3s and WR3t form a unique wildlife haven that deserves to be protected from development by being given LGS status. Evidentially the land meets all the criteria laid out in the NPPF guidelines. Movements in residential land availability elsewhere offer the opportunity for RBC to proactively meet their environmental obligations without diminishing their ability to provide adequate housing stock as required by Government.</p>	
Michael George Facer	N/A	<p>The land is a wildlife refuge, principally because of the badger sett, which makes it subject to the Protection of Badgers laws. It would be an act of vandalism to use the space for any other purpose, especially for residential development.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p>
Jennifer Susan Cottee	N/A	<p>I disagree with the sites WR3s and WR3t remaining in the list of sites for development. Their inclusion pose real ongoing risks to the amount of land for cultivation in the neighbouring allotments. Both sites should both be designated as Local Green Space, if the alternative suggested in 6.12 is to be rejected again.</p> <p>The boundary determined for WR3t by the current owner includes the access to the allotment site, the allotment carpark and access track for many plots. It is very unlikely that a new owner of WR3t would retain this use of land since there appears to be no alternative access to WR3t. The most probable outcome is the loss of allotment land available for cultivation to replace access from Armour Hill, car-park and track access to allotment plots. However, the planning conditions on WR3t (bullet 2 and part of bullet 1) are mutually incompatible if access to WR3t is required by the current means. The Local plan must not contain contradictions.</p> <p>The boundary of land WR3s equally would involve loss of currently cultivated allotment land within the main allotment site.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p> <p>The provisions in WR3t around ensuring that access and parking is not reduced should be strengthened to ensure that allotments are not lost to accommodate facilities displaced from the development site.</p> <p>The boundary of WR3s is proposed to be slightly amended to remove areas that are in use as allotments at the north west of the site.</p>
Jean H Rainey	N/A	<p>Remove both sites from the plan, Housing is needed in Reading but so is green space. The housing that will be built here will be expensive high-end because of where it is. What Reading needs is affordable housing which developers won't build here. The site is 100% tailor made for biodiversity enhancement. Build houses on sites which are not.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance</p>

			for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.																																																																																										
Anna Iwaschkin	N/A	I request that the spaces relevant to this question be maintained.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.																																																																																										
Pete Evans	N/A	<p>I think neither site WR3s or WR3t should be allocated for development in the updated local plan. On the contrary both sites should both be designated as Local Green Space</p> <p>I am alarmed by the increasing number of sinkholes in the area. Oak tree road has been closed for months. There have also been sinkholes on Armour Hill, Pierces Hill and Chapel Hill in recent times, probably many more. It is the council that picks up the bill for filling these in. I am concerned that a development at this scale could adjust the water flow and load on the ground in the area and increase the prevalence of sinkholes.</p> <p>The British Geological Survey cites Construction and development as a trigger of sinkholes: [unable to copy link into document, please see original response for URL] "modifying surface drainage or altering the loads imposed on the ground without adequate support can cause sinkholes to develop."</p> <p>Please end this decades old battle once and for all. There is too much local opposition for it to ever get built on.</p>	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p> <p>The point about land stability is noted, and a clause should be added to these policies to highlight that this is a matter that should be addressed at planning application stage.</p>																																																																																										
Steve Hicks	N/A	<p>[The] increased [housing] need can be met with the additional sites proposed from the latest Call for Sites as well as the included increased volumes in previously nominated sites as shown below.</p> <table border="1"> <thead> <tr> <th>Site Code</th> <th>Site Name</th> <th>Reason for Change</th> <th>Change in Dwelling Numbers</th> <th>Vol</th> </tr> </thead> <tbody> <tr> <td>CR12a</td> <td>Cattle Market</td> <td>volume change</td> <td>330-490 to 800-1200</td> <td>705</td> </tr> <tr> <td>CR13c</td> <td>Forbury Business Park</td> <td>volume change</td> <td>190-285 to 430-450</td> <td>339</td> </tr> <tr> <td>Cen3</td> <td>John Lewis</td> <td>new</td> <td></td> <td>200</td> </tr> <tr> <td>Cen5</td> <td>Norman Place</td> <td>new</td> <td></td> <td>240</td> </tr> <tr> <td>Cen6</td> <td>Reading Bridge House</td> <td>new</td> <td>300-400</td> <td>350</td> </tr> <tr> <td>Cen7</td> <td>Tesco Extra</td> <td>new</td> <td>150-200</td> <td>175</td> </tr> <tr> <td>Cen8</td> <td>Kennet Place</td> <td>new</td> <td></td> <td>70</td> </tr> <tr> <td>Cen9</td> <td>Sapphire Plaza</td> <td>new</td> <td>250-400</td> <td>325</td> </tr> <tr> <td>Cen10</td> <td>Reading College</td> <td>new</td> <td></td> <td>45</td> </tr> <tr> <td>Sou1</td> <td>Reading Link</td> <td>new</td> <td></td> <td>200</td> </tr> <tr> <td>Sou2</td> <td>Tunbridge Jones</td> <td>new</td> <td>72-96</td> <td>84</td> </tr> <tr> <td>Sou3</td> <td>Drake Way</td> <td>new</td> <td></td> <td>23</td> </tr> <tr> <td>Sou4</td> <td>Green Park Village</td> <td>new</td> <td></td> <td>50</td> </tr> <tr> <td>Eas1</td> <td>Upper Crown St</td> <td>new</td> <td></td> <td>46</td> </tr> <tr> <td>CA1b</td> <td>Reading Golf Club</td> <td>volume change</td> <td>90-130 to 223</td> <td>113</td> </tr> <tr> <td>W</td> <td>West Reading</td> <td>Detailed separately</td> <td></td> <td>268</td> </tr> <tr> <td colspan="3"></td> <td>Average Increase</td> <td>3233</td> </tr> </tbody> </table> <p>As regards the West Reading and Tilehurst area an <u>increase in volumes of dwellings even with the deselection WR3s and WR3t is still significant</u>, as shown below:</p>	Site Code	Site Name	Reason for Change	Change in Dwelling Numbers	Vol	CR12a	Cattle Market	volume change	330-490 to 800-1200	705	CR13c	Forbury Business Park	volume change	190-285 to 430-450	339	Cen3	John Lewis	new		200	Cen5	Norman Place	new		240	Cen6	Reading Bridge House	new	300-400	350	Cen7	Tesco Extra	new	150-200	175	Cen8	Kennet Place	new		70	Cen9	Sapphire Plaza	new	250-400	325	Cen10	Reading College	new		45	Sou1	Reading Link	new		200	Sou2	Tunbridge Jones	new	72-96	84	Sou3	Drake Way	new		23	Sou4	Green Park Village	new		50	Eas1	Upper Crown St	new		46	CA1b	Reading Golf Club	volume change	90-130 to 223	113	W	West Reading	Detailed separately		268				Average Increase	3233	<p>Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.</p> <p>In terms of demonstrating the amount of homes that can be delivered elsewhere, the numbers quoted for many of the new and existing sites are well above the capacity of those sites to accommodate development, in some cases (such as Sapphire Plaza and Reading Bridge House) very significantly. In addition, in the case of CR12a and CR13c it is difficult to see how the right hand column is derived from the change in dwelling numbers.</p>
Site Code	Site Name	Reason for Change	Change in Dwelling Numbers	Vol																																																																																									
CR12a	Cattle Market	volume change	330-490 to 800-1200	705																																																																																									
CR13c	Forbury Business Park	volume change	190-285 to 430-450	339																																																																																									
Cen3	John Lewis	new		200																																																																																									
Cen5	Norman Place	new		240																																																																																									
Cen6	Reading Bridge House	new	300-400	350																																																																																									
Cen7	Tesco Extra	new	150-200	175																																																																																									
Cen8	Kennet Place	new		70																																																																																									
Cen9	Sapphire Plaza	new	250-400	325																																																																																									
Cen10	Reading College	new		45																																																																																									
Sou1	Reading Link	new		200																																																																																									
Sou2	Tunbridge Jones	new	72-96	84																																																																																									
Sou3	Drake Way	new		23																																																																																									
Sou4	Green Park Village	new		50																																																																																									
Eas1	Upper Crown St	new		46																																																																																									
CA1b	Reading Golf Club	volume change	90-130 to 223	113																																																																																									
W	West Reading	Detailed separately		268																																																																																									
			Average Increase	3233																																																																																									

Site Code	Site Name	Reason for Change	Change in Dwelling Numbers	
WR3c	28-30 Richfield Avenue	change of use	loss of 50 - 80	-65
WR3e	Yemonyary House	change of use	possible loss of 10 - 14	-12
WR3j	Moulsford Mews	volume change	max from 16 - 26, plus 10	10
WR3m	103 Dee Road	volume change	max from 50 - 54, plus 4	4
WR3o	The Meadway Centre	change of use	+258 residential	258
WR3s	Land at Kentwood Hill	change of use	41 - 62	-52
WR3t	Land at Armour Hill	change of use	12 - 18	-15
Wes1	Milford Road	new	+70	70
Wes2	72 Berkeley Avenue	new	+20-30 (could be up to 35)	25
Wes3	132-134 Bath Road	new	approx 30 (could be up to 44)	30
Wes4	234 Southcote Library	new	+15	15
			Effect of all changes	268

There are also developments not included in the Local Plan or Partial Update that will increase housing numbers.

Also as demand cannot be accurately forecasted and the Government has moved away from Local Plan led housing targets it could be argued that fulfilling market demand and policy delivery and are academic. We will never build enough housing as demand is infinite.
See the Councils Local Green Space and Public Open Space Background Paper March 2018

Deallocation a potentially surplus residential development to LGS status would evidence this policy shift and is not without precedent.

Reallocating the sites as LGS helps the Council meet its Climate Emergency objectives, zero carbon policy and biodiversity net gain requirements which all carry planning weight.

Changing designation is in line with RBC policy EN12 – Biodiversity and the green network. Including WR3s and WR3t as LGS is supported by policy EN14 – Trees, hedges, and woodland. A TPO had been in place since September 2000 on 12 specific individual trees, 2 groups of trees and 5 areas of trees and an Area TPO was served in March 2022 to protect all of the trees.

The majority of the roadside perimeters of the sites are made up of dense trees and mature hedgerows. Many of the trees would be considered veteran and there are many examples of mature ash trees with no evident die back.

Also to be considered is the impact that any development would have on the Major Landscape feature contained within WR3s, “the West Reading Wooded Ridgeline” recognised for its value and characterised by its amenity value, largely as a result of its collective tree cover.

Changing the designation of sites WR3s and WR3t meet some of the Councils Sustainability Framework objectives.

Objective 4 seeks to minimise consumption of, and reduce damage to, undeveloped land. Sites WR3s and WR3t are green field

Objective 7 details valuing, protecting, and enhancing the amount and diversity of wildlife and 8 seeks to avoid adverse effects on designated wildlife sites. Well over 100 different species have been recorded

Objectives 1, 2 and 9 are also relevant. Objective 1 - any house building will reduce the mass of flora absorbing CO2 and other greenhouse gases from Kentwood and Armour Hill. Objective 2 - there are a number of underground streams that run through WR3t, and this area has historically been used to

In addition, the necessary change to the plan period means needing to find an additional five years worth of supply within the plan.

National policy has not moved away from Local Plan housing targets, and the need to set housing targets in Local Plans has consistently remained throughout national policy. There have been changes related to the starting point for setting these targets, but not to the need to set targets.

No part of the identified West Reading Wooded Ridgeline is within the proposed development site.

		<p>grow watercress. Objective 9 relates to clean environments and site are not accessible to human activity.</p> <p>All the above points under this Question 75 <u>have material planning policy weight</u> and should be assessed in the <u>planning balance</u> when considering residential deallocation and LGS protection.</p> <p>I hope I have demonstrated that the reallocation of sites WR3s and WR3t from residential development to protected local green space:</p> <ul style="list-style-type: none"> has strong local community support meets the necessary criteria has support from a range of professional organisations and authoritative bodies protects a long established and unique woodland wildlife habitat is not detrimental to housing supply is not without precedent supports other Planning and Council policies 	
Tilehurst People's Local Charity	N/A	<p>For the detailed reasons given elsewhere in this document and in the Lichfields document, neither the 'Development for Residential' designations of WR3s and WR3t, nor the boundary of site WR3t, should be changed in any way.</p> <p>[Please see additional comments in response to Q. 15]</p>	See response to those comments.
Allan Thompson	N/A	<p>I do NOT agree to any development of these sites. The proposed development would: cause significant harm to the coherence of the ecological network cause loss or deterioration of veteran trees and the habitat for numerous wildlife animals. kill or disturb a bat/ dormouse/ greater crested newt or damage/destroy its breeding site or resting place.</p> <p>There are inadequate biodiversity improvements in and around the proposed development, to secure measurable net gains for biodiversity. Any additional traffic onto Armour Hill from this site will cause accidents. There is barely enough space for two cars (let alone vans) to pass and the road is already used as a rat run by speeding cars</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Zara King	N/A	<p>It is a shame that the proposed use of land in an already highly populated area & would mean the removal of the limited green space. The land is being used as mainly for allotments and therefore sustainable and helps build the community. Any development would severely impact the rich wildlife and their habitats in this area. I oppose the plans and hope alternative spaces are considered instead of green land. I visit this space often and it is vital for health & community bonds.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
The Woodland Trust	N/A	<p>As per our response to Q15, would support their designation as Local Green Space on the basis of the presence of woodland (Priority Habitat Inventory - Deciduous Woodland).</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife and the main bulk of any priority habitat. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Simon Shiel	N/A	<p>I would like the whole area, (i.e. WR3s, WR3t, the Victoria Recreation Ground and the allotments), designated as Local Green Space.</p>	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation

			and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Nicky Caton	N/A	They should be protected as local green space	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
David Hargreaves	N/A	The areas should left alone as a Local Green Space.	Change proposed. It is proposed to remove approximately 0.46 ha of the areas of greatest sensitivity from the Land at Kentwood Hill allocation and to add it to the Local Green Space designation, which includes those areas of greatest importance for wildlife. Much of the area makes very little contribution to green space or is brownfield, so designation of the full area is not considered appropriate.
Lichfields (OBO Tilehurst People's Local Charity)	N/A	See response to Q. 15	Noted.

Q. 76 Do you have any comments on the potential additional allocations to policy WR3?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Anthony Acka'a	N/A	Good idea	Noted. No changes required.
Jean H Rainey	N/A	Wes2 - option 4 and save the trees. Other ones I have no strong opinion on.	Noted. Retention of trees is noted within the proposed policy.
Opus Works (OBO British Estates Services Ltd)	N/A	<p>The background planning detail to the site is set out in 'Land at 120 – 134 Bath Road, Reading, RG30 2EU, Call for Sites Submission, June 2023', which is resubmitted for completeness.</p> <p>Further to this initial submission, further due diligence has been undertaken on site that has enabled a more considered and wholly deliverable scheme to come forward.</p> <p>Drawing no. 437-ACG-ZZ-ZZ-SK-A-0005 identifies a 44 unit scheme, which would deliver 50% of all homes as 3 bedroom +. In addition, there are a number of larger 2 bedroom flats proposed. It is considered that the mix is appropriate for the locality, but could also be amended to provide a greater number of 3 bedroom units in line with emerging policy if required (albeit this is likely to come at the expense of some of the larger 2 bed and the 4 bed homes proposed).</p>	Noted. It is agreed that this is a suitable site for allocation in the Local Plan, and it is proposed to be included within policy WR3. The number of dwellings to be accommodated will ultimately be a matter for any planning application stage, with indicative capacity only shown in the policy, although applying the HELAA on a consistent basis with other sites indicates that the capacity may be lower,

	<p>The proposed 44 home scheme would be tenure-blind and, subject to viability (given unknown contamination on site and the lack of detailed due diligence to date) would accommodate policy and tenure-mix compliant affordable housing.</p> <p>The arrangement of built form and spaces around this ensures good separation to adjacent properties and will also enable buildings to be located without loss of trees unless removal of these is deemed to benefit the site (for instance as may be the case of the large leylandii to the rear of Bath Road properties). Where trees are removed, these will be replaced by appropriate, native species to ensure that privacy is maintained and biodiversity and urban greening is uplifted. It is proposed to supplement urban greening and biodiversity net gain on the ground through provision of rooftop planting. It is likely that a brown roof will be proposed as this will also allow for provision of photovoltaics for renewable energy generation.</p> <p>The approach to massing reflects the approach to located built form away from site edges within green space. By taking this approach, three storey built form is located sufficiently separately from adjacent Burcroft Road properties; the land related to which is significantly raised from the proposed allocation site. It is possible to provide further separation and screening in this area if considered necessary.</p> <p>52 car parking spaces are proposed to be provided at a ratio of 1:1.18 with homes, which is considered appropriate for the locality given proximity to local shops, amenities and services and the public transport network which provides high frequency connections to the local area and town centre beyond. It is possible to provide tandem spaces on site for some of the larger units, which in turn would free up some single bays for visitor use. To date, this approach has not been undertaken due to the desire to maximise green space within the development.</p> <p>Stantec has prepared a Technical Note that identifies that appropriate two-way access is readily achievable from Bath Road and that the proposed layout enables efficient waste collection. In terms of trip generation, given current on-site uses, the proposals will result in a similar effect on the local highway network as that currently. It is recognised that use of the site for residential will have an impact upon current employment uses. In this regard, it is noted that the on-site uses, which predominantly comprise car maintenance workshops and associated offices, can be readily accommodated within existing vacant stock in the Borough. If necessary, further assessment of this matter can be undertaken to support any Regulation 19 submission. Taking the above into account, it is clear that the proposals represent a positive use of the site that will benefit neighbouring uses and deliver significant levels of family housing where it is most required.</p> <p>The proposed scheme, whilst still in its infancy, is well-considered in terms of use of space in order to maximise green areas and provide a safe and secure location that will encourage use by the families intended to live there. Every effort has been made to provide centrally-located built form in order to minimise potential for tree removal (unless desirable and to be replaced by native species, details to be discussed with the Council in respect of any application made).</p> <p>The scheme will rejuvenate a currently noisy and contaminated site and provide a more neighbourly use within what is primarily a residential area, whilst delivering much-needed housing, including high levels of family housing within the Borough.</p> <p>It is considered that the potential of the site has been demonstrated by the submissions made and the client welcomes the opportunity for further discussions with the Council to ensure that any outstanding detail considered necessary is submitted by Regulation 19, allowing the site to be allocated within the LPU.</p>	
--	---	--

		See separate Call for Site Submission document also submitted alongside representation regarding land at 120-134 Bath Road. Also see transport note submitted.	
The Woodland Trust	N/A	Milford Road would benefit from increased tree cover: as noted in the site constraints, existing trees at the Berkeley Avenue and Bath Road sites merit retention.	Noted. This will be assessed at application stage and required by natural environment policies within the Local Plan.
M Langshaw	N/A	It would be good for Southcote Library to either remain, or at least to be retained as a community facility.	Southcote Library has already closed on this site and reprovided in another form. It is considered that this represents an appropriate site for development.

Additional representations submitted via email regarding other sites for development in West Reading and Tilehurst

Respondent name	Comments	RBC Officer Response
ICB	<p>The ICB has no particular concern about the proposed removal to some of the sites from the policy to reflect the latest developments of those sites.</p> <p>Given that the uses and the scale of development are only indicative at this stage, the ICB has no particular concern to the sites identified from the call for sites exercises. Notwithstanding, the ICB considers that those new identified sites will inevitably have additional pressure to the existing primary healthcare provision. The existing supporting paragraph 7.3.15 to Policy WR4 generally sets out that some sites identified for housing may have the potential for community uses including healthcare facility. The ICB considers that the wording of the supporting paragraph is not precise. If the Council is intending to introduce community uses including primary healthcare facilities to some of the sites, the Council should liaise with the relevant providers at a minimum to work out the most appropriate way to place those uses which can be operationally and financially viable.</p> <p>The situation is more complicated in primary healthcare provision as GP practices are privately owned. If the Council is intending to accept the ICB's suggestion as above, the ICB is happy to work with the Council, site promoters and GP representatives to explore the opportunities for such provisions. The ICB also welcomes site promoters to undertake any feasibility studies for the commissioning of the facility. The findings of the studies can help inform the wording of this Policy, including whether an onsite primary healthcare provision can be identified, or an offsite mitigation measure should be provided.</p> <p>The ICB has the following recommendation on the wording of Policy WR4: <i>The following sites will be developed according with the principles set out in this policy:</i> General principles for all sites including residential use. Development should:</p> <ul style="list-style-type: none"> • Address the impacts on the existing infrastructural capacity including primary healthcare provision. <p>he ICB also has the following recommendation on the wording of supporting paragraph 7.3.15 to Policy WR4: The Council should work with relevant infrastructural providers and all developers to identify the onsite provision of community uses, including healthcare or education. Other offsite mitigation measures should be provided where appropriate if onsite delivery is not financially or operationally viable.</p>	<p>No change proposed. It is not clear which site is intended to be subject to the change, and matters such as mitigating infrastructure impacts unless there are sites specific needs are more appropriately dealt with by a general policy rather than individually from site to site.</p>

<p>Thames properties (OBO Thames Development Groups Limited)</p>	<p>Regarding Site at Milford Road [Please see full response for various tables/diagrams which cannot be copied into this document]</p> <p>Water Environment was commissioned by Thames Developments Ltd to review the flood risk and possible impacts of a proposed development of approximately 60 dwellings on land west of Milford Road, Reading (RG1 8LL).</p> <p>The site lies within the jurisdiction of the Reading Borough Council (RBC) who also fulfil the role of Lead Local Flood Authority (LLFA).</p> <p>The GOV.UK Flood Map for Planning shows the site to lie within Flood Zone 2 of the River Thames and therefore a Flood Risk Assessment (FRA) is required to support a planning application on the site.</p> <p>This document has been prepared with due consideration of the NPPF (NPPF), the latest planning practice guidance for Flood Risk and Coastal Change and the Environment Agency's (EA) Flood Risk Standing Advice (FRSA). In addition, this FRA will address local requirements for planning (including the RBC Policy EN18:Flooding and Drainage).</p> <p>Site Levels No topographic survey of the site has not been undertaken; as such, the latest LiDAR data has been used to determine ground levels around the location of the site. The LiDAR for the site and surrounding area can be seen in Figure 2.</p> <p>Ground levels are shown to range from 37.52 m Above Ordnance Datum (AOD), adjacent to the residential around the south eastern corner, to 39.25 m in the north western corner of the site.</p> <p>Assessment of Tidal and Fluvial flood risk The site is not at risk of flooding from the sea due to its high elevation above sea level.</p> <p>The published GOV.UK Flood Map for Planning shows the site is located wholly within Flood Zone 2 (Figure 3). At this location, Flood Zone 2 is defined as land having between 1% and 0.1% annual probability (medium probability) of river flooding. No flood storage areas or flood defences are present in the proximity of the site.</p> <p>Flood Zone 3 equates to 'high' risk (which for fluvial sources equates to a greater than 1% Annual Exceedance Probability - AEP). Areas in Flood Zone 1 (not highlighted) equate to less than 0.1% AEP of fluvial or tidal flooding.</p> <p>Probability of flooding Selected hydraulic model results including modelled flood extents for all return periods, flood levels and flood depths for the design event were extracted from the Thames (Pangbourne to Sonning) 2019 – hydraulic model provided by the EA. The extracted model results for the 1% AEP event floodplain matches that of the Flood Zone 3 outline, confirming the validity of the Flood Zone classification at this location. Based on the extracted model results, the probability of flooding on site is less than 1% annually in the present - day scenario.</p> <p>Climate Change</p>	<p>Noted. This site is not proposed to be taken forward as a residential allocation due to the high level of identified need for industrial and warehouse space and the implications of the loss of existing stock.</p>
--	--	---

It is a requirement of the NPPF that climate change is included in the analysis of flood risk. The projected impacts of climate change are likely to result in increased risk of flooding from rivers due to increased intensity and frequency of extreme rainfall events. Climate change allowances are therefore included as part of the assessment.

Revised climate change allowances were defined in July 2021 and are presented within the Environment Agency's 'Flood risk assessments: climate change allowances' guidance available on the GOV.UK website. Management catchment climate change allowances from the peak river flow map should be used for the epoch most appropriate for the lifetime of the development. The expected lifetime for the proposed development scheme is 100 years due to the residential nature of the development.

The application site lies within the Thames and South Chilterns Management Catchment and the allowances presented in Table 1 are for the '2080s' epoch (2070 to 2125).

Table 1: Climate change allowance by management catchment

Management Catchment	Allowance Category	Total potential change anticipated for the '2080s'
Thames and South Chilterns	Upper	76%
	Higher	43%
	Central	31%

The climate change guidance states that assessments should use the central allowance for 'more vulnerable' developments in Flood Zone 2 or 3a. The higher central should only be used where there is a potential for the scheme to impact on essential infrastructure, and the upper end presents a reasonable estimate of the maximum likely flood at any location. An uplift on the peak river flow of 31% will therefore be used in this assessment.

The "design flood"⁵ is a flood event of a given annual flood probability and for river flooding this is generally taken as flooding likely to occur with a 1% annual probability (a 1 in 100 chance each year) plus an appropriate allowance for climate change. In this case, the design flood or design event is the 1% AEP plus 31% uplift for climate change event. As the hydraulic modelling study had not modelled a 31% climate change scenario, the 1% AEP plus 35% uplift for climate change event will be used to assess the 'design event'.

Flood water levels

Modelled flood extents, water levels and flood depths have been extracted from the Thames (Pangbourne to Sonning) 2019 hydraulic model provided by the Environment Agency. The model results include a range of flood events and climate change allowances. As explained above, the climate change allowance used as the 'design event' for this assessment is 35%. The results include flood levels sampled at several locations in the floodplain around the site, providing a representative range of flood levels. The estimated levels from the EA model are presented in Table 2.

Table 2: Modelled floodplain water levels

Flood levels (m AOD)

Sampled point	1% AEP	1% AEP (+25%)	1% AEP (+35%)	1% AEP (+70%)	0.1% AEP
1	No flood	38.77	38.82	39.06	38.87
2	No flood	38.72	38.78	39.03	38.84
3	No flood	No flood	No flood	No flood	No flood
4	No flood	No flood	No flood	38.70	38.51

Modelled extents, shown in Figure 4, detail that the site is not at risk of flooding in the 1% annual probability flood. This confirms that the site is not in the extent of present-day Flood Zone 3. The 0.1% AEP flood water levels confirm that the majority of the site is located in Flood Zone 2. The 1% AEP + 70% cc event would be expected to cause more extensive flooding than that of the 0.1% AEP event.

As previously stated in section 3, the maximum on site ground level is at 39.25 m AOD in the north west corner of the site. The 0.1% AEP flood water levels range between 38.84 - 38.87 m AOD, confirming that the site is only partially located in Flood Zone 2, unlike what is shown in the latest GOV.UK Flood Map for Planning.

The site is within the modelled extent of the 1% annual probability flood event including a 35% allowance for climate change. The modelled flood water level across the site during this event varies marginally, ranging between 38.78 m AOD at sample point no.2, to 38.82 m AOD at sample point no.1.

LiDAR extracted survey data indicates that on-site ground levels at the sampled point location 2 is approximately 38.55 m AOD. The maximum depth of flooding on site is therefore expected to be 0.27m.

The hydraulic model results included a predicted depth of flooding on site in the 1% annual probability flood including a 35% allowance for climate change. The model results show the flood depth at sample point location 2 on the site to be 0.38 m, in the north eastern corner of the site.

Summary of design response to flood risk Raised Finished Floor Levels to make development safe

The proposed development would be at risk of flooding in the design event of 1% AEP plus 35% climate change allowance. In order to comply with EA guidelines, the Finished Flood Level (FFL) of the ground floor (i.e. lowest habitable floor) of the proposed dwelling should be located at least 300 mm above the 1% AEP plus 35% climate change allowance flood level, taken for the site as 38.82 m AOD.

Therefore, the proposed ground floor should set the internal FFL, at a minimum, of 39.12 m AOD. In addition, this is also set above the 0.1% AEP event (Flood Zone 2).

Safe access and egress for safety of future occupants

The Environment Agency has previously stated for new developments that a means of safe access and egress along a route with “very low hazard” should be established to ensure the safety of future site occupants. The provision of such a route provides a final safeguard in the extremely unlikely event that flooding occurs to the level of the design flood event, suddenly, without sufficient warning for evacuation to be performed in advance, and that site occupants experience an emergency that requires evacuation on foot. In practice, this scenario is extremely unlikely to occur.

<p>The site is based in the River Thames Flood Warning Area of Reading and Caversham, while the Flood Alert Area is the River Thames from Mapledurham to Sonning.</p> <p>The site is located within an area with vigorous flood monitoring and forecasting procedures and is subject to the Flood Warning Service operated by the Environment Agency. The mechanism of flooding within the catchment is such that upstream flooding reports and flood gauges provide a substantial level of advance warning of severe flood events.</p> <p>The hydraulic model of the River Thames (Pangbourne to Sonning) includes flood hazard mapping based on the Hazard to People Classification as described in “Supplementary Note on Flood Hazard Ratings and Thresholds for Development Planning and Control Purpose – Clarification of Table 13.1 of FD2320/TR2 and Figure 3.2 of FD2321/TR1” 6.</p> <p>This output is more reliable than using maximum depths and velocities, which will not necessarily occur simultaneously, and may equally not create the greatest hazard. The modelling methodology includes the “conservative” estimate of debris factor and therefore presents the worst-case hazard rating. The output is shown in Figure 5.</p> <p>The flood hazard rating is a combination of depth and velocity, as shown in Table 3, with the results grouped as follows:</p> <ul style="list-style-type: none"> • 0.50 to 0.75: Very low hazard • 0.75 to 1.25: Danger for some (includes children, the elderly and the infirm) • 1.25 to 2.00: Danger for most (including the general public) • > 2.00: Danger for all (including emergency services) <p>The flood hazard mapping indicates that the area of proposed development on site is classified as ‘Danger for some’ and ‘Danger for most’ during the fluvial design event of 1% AEP plus 35% climate change. The ‘Danger for most’ classification includes the general public, only omitting emergency services. Therefore, it may be necessary to raise ground levels around the proposed dwellings to create walkways which have a ‘very low hazard’ and to enable safe access to and from each dwelling.</p> <p>The surrounding roadways around the site however are shown to be classified as ‘Very low hazard’. It would therefore be safe for residents of the proposed development to evacuate the property once the flood event reaches the local area.</p> <p>Figure 5 shows that areas to the north of the site are not expected to experience flooding during the design event. For residents exiting their property from the eastern side of the site, egress along Milford Road would be possible through flood water classified as ‘Very low hazard’. Occupants on the western and southern sides of the site would be able to exit to Weighbridge Row and Cardiff Road, respectively. Both of these roadways are not expected to experience flooding classified as greater than ‘Very low hazard’, apart from two isolated spots of low elevation classified as ‘Danger for Some’. Residents may then walk along Milford Road to areas of higher ground located out of the design event floodplain, where they should remain until the flood event has passed and the flood warning code for the River Thames at this location has been removed. If floodwater crosses the evacuation route, children, the elderly or disabled should be assisted.</p> <p>Floodplain compensation to ensure no increase in flood risk elsewhere Any development that is proposed within the floodplain during the design event must ensure that it does not increase flood risk elsewhere. As the proposed development location has been found to be located with the design event floodplain, the Environment Agency will require the site to undertake a floodplain compensation</p>	
---	--

	strategy on a volume-for-volume and level-for-level basis to determine an acceptable non-floodable footprint on the site, taking into consideration the potential requirement for raised walkways to ensure a safe route of access from individual dwellings. The floodplain compensation strategy could potentially constrain development on the site.	
Opus Works (OBO British Estates Services Ltd)	<p>Re 132-134 Bath Road We have previously submitted detail to support our case for inclusion within the LPU as part of the Council's initial Call for Sites. This detail has been updated and subject to further due diligence to underpin its planning position as a sustainable site on previously-developed land, that is located in a highly accessible and well-connected area of Reading.</p> <p>In these respects, proposed development at 132-134 Bath Road (the site) accords with the Council's objectives to deliver growth in sustainable locations which are, or can be, well-served by existing infrastructure and services.</p> <p>The development of the site, which currently is occupied by a range of light-industrial and <i>sui generis</i> uses that represent poor neighbours in an area of predominantly residential buildings will also deliver much-needed housing, including a significant percentage of larger units, in a location that can best cater for this form of development; being close to local amenities and services and, importantly, open green spaces providing opportunity for leisure, relaxation and play.</p> <p>Opus Works and its client are resolute in the belief that the site is suitable, achievable and deliverable and, through this submission to the Regulation 18 consultation on the LPU, intends to promote this site in order to secure a site allocation for residential development.</p>	It is considered that the site would potentially be suitable for residential development and it is therefore included as a proposed allocation within the Local Plan Partial Update.

Q. 77 Do you agree with the proposed changes to the existing allocated sites in Caversham and Emmer Green? (This question relates to policy CA1)

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Adam Boulding	Other	odd how housing is reducing in only this area and it seems that massive flats and apartments are built and proposed for all south of the river locations	No change needed. It is noted that new housing allocations are principally a result of the submissions via the Call for Sites exercise undertaken in 2023.
Paul Oliver James Melville	Y	see above	See officer response to Q. 76.
CADRA	No Answer	We agree with the updating to reflect planning approvals and developments in progress. Changes in capacity would need to be considered against criteria for considering exceptions, to include matters such as the presence of heritage assets or sensitive landscapes or townscapes, unacceptable impacts on residential amenity and any impacts on delivering the necessary mix of sizes of dwelling.	Noted. These matters would be addressed at application stage and employ other policies within the Local Plan, such as those regarding heritage, landscape, amenity, density and mix.
Stantec (OBO UoR)	Other	The University has no comments regarding the amendments to the wording of this policy to ensure it is up to date. However, it supports the continued inclusion of CA1a Reading University Boat Club, Thames Promenade as an allocation for residential development.	Answer is noted. No changes needed.
Woolf Bond Planning (OBO Fairfax Planning)	N	No. Whilst the allocation at the former Golf Club (CA1b) has planning permission for redevelopment, which has commenced, an allocation is required of the northern part of the site (lying within Reading Borough) to ensure the plan does not hinder development of the surplus parts south of Cucumber Wood within South Oxfordshire District.	No change proposed. In order to be deliverable, an allocation should be consistent with plans of adjoining authorities, and no such allocation is included within the South and Vale plan. The Local Plan does not apply any additional constraints to this location over

			and above any that already exist, and any proposal will need to be considered on its merits.
--	--	--	--

Additional representations submitted via email regarding sites in Caversham and Emmer Green

Respondent name	Comments	RBC Officer Response
<p>Woolf Bond Planning (OBO Fairfax Reading)</p>	<p>Our client (Fairfax (Reading) Ltd) has a controlling interest in land at the former Reading Golf Club, west of Kidmore End Road, Emmer Green, Reading. The former golf course straddles the administrative boundary of Reading Borough and South Oxfordshire District.</p> <p>Outline planning permission was granted in March 2022 for the redevelopment of that part of the golf club within Reading Borough, which allowed for the demolition of the clubhouse building and the erection of up to 223 dwellings (LPA Ref 211843). This permission was varied through application 221312 and reserved matters planning permission 220390. Development of the part of the former Golf Club site in Reading borough is being undertaken by the Vistry Group (“Vistry”) (Bovis Homes).</p> <p>Reading Golf Club has acquired the lease on the Caversham Heath Golf Club and is now operating from this location (within South Oxfordshire District). On the parts of the former Reading Golf Club in South Oxfordshire district, a nine hole family golf is operating as “Fairways Family Golf”.</p> <p>This leaves the remainder of the former, now redundant golf course, within SODC that is available for development.</p> <p>The land extends to approximately 5ha and is located to the north of the area of land under construction by Vistry (paragraph 1.2 refers) (see also footnote 1) and south of Cucumber Wood.</p> <p>The land could be developed for up to 100 dwellings, with access to be taken from Kidmore End Road, and/or through the land Vistry development to the south.</p> <p>Paragraphs 3.5 to 3.12 of the consultation draft Local Plan address the wider spatial context within which the Borough is located, including the difficulties in meeting the qualitative and quantitative housing need. As paragraph 3.5 of the consultation draft Local Plan identifies “the fact that Reading is a geographically small, urban authority means that development relies almost wholly on previously-developed land, and the spatial strategy is to a large extent dictated by where sites are available.”</p> <p>Whilst paragraph 3.8 correctly identifies that the LPPU can only directly influence development within Reading’s administrative boundary, paragraph recognises the “strong interrelationships with those areas immediately outside our boundaries”, noting that “development on one side of the boundary is potentially capable of meeting needs arising on the other.”</p> <p>It is within this context that our representations are submitted, referring to the benefits of the Council in continuing a collaborative approach to the location of development within neighbouring authorities, including SODC.</p> <p>In submitting these representations, which advocate residential development of the parts of the former golf course south of the woodland belt (Cucumber Wood), we highlight the spatial importance of ensuring connectivity from land within Reading Borough to land in neighbouring authorities; thus avoiding the sterilisation of land that could otherwise come forward in helping to meet identified housing needs in a sustainable location.</p>	<p>No change proposed. The Council continues to engage with South Oxfordshire District Council under the duty to co-operate, and recognises the relationships across the boundary. However, it cannot identify land outside its boundaries for development, and whether or not this land is identified for development will be a matter for SODC to lead on. As it stands, the land is not identified for development.</p>

	<p>The land in question can deliver a good mix of house types, including family-sized homes that are otherwise difficult to provide in Reading due to land constraints (paragraph 3.7 of the consultation draft Local Plan refers). Development of the land off Kidmore End Road can also deliver an appropriate mix of affordable homes.</p> <p>Fairfax has a strong belief in the principle of the plan-led system and in setting out our representations upon the draft Local Plan, we hope to be able to work with the Council between now and the formal submission of the draft Local Plan pursuant to Regulation 22 of The Town and County Planning (Local Planning) (England) Regulations 2012 (as amended), to ensure the Local Plan satisfies the tests of soundness at paragraph 35 of the NPPF (“NPPF”).</p> <p>Although our client supports the Council’s approach in seeking to identify sufficient opportunities to meet the Borough’s housing need within its administrative area, due to the acknowledged land constraints, it is important that there is engagement with all its neighbouring authorities and their role through the Duty to Co-operate in seeking to address shortfalls.</p> <p>Given its inherent functional relationship between SODC and Reading Borough, the Councils must cooperate on strategic issues as part of plan-making under the requirements of the Duty to Co-operate.</p> <p>Whilst the northern part of South Oxfordshire has a clear and obvious relationship with the City of Oxford (to its north west), the southern parts of the SODC are just as functionally tied with the Reading zone of influence.</p>	
<p>Woolf Bond Planning (OBO Fairfax Reading)</p>	<p>Policy CA3 details a number of amendments envisaged by the Council to take account of the implementation of the sites currently allocated. Whilst construction has commenced on the former Golf Club site allocated in the current Plan (site ref CA1b) following the grant of planning permission for this and the wider land (see summary in section 1), it is important that the approach of the plan does not hinder further development in the area. This would include an additional phase of development for around 100 dwellings on land within South Oxfordshire, albeit with access from Reading Borough.</p> <p>The Framework Plan submitted illustrates how development on the part of the former Golf Club south of Cucumber Wood within South Oxfordshire District would include access and linkages to adjoining development. These adjoining developments include that approved at the Golf Club together with those along Kidmore End Road and Highdown Hill Road. As detailed in the section regarding the failure to include the land west of Kidmore End Road as an allocation, this should be referenced in the policy.</p> <p>The policy CA1 should be amended to include reference to our clients site on land west of Kidmore End Road. Whilst this is primarily in South Oxfordshire District, it will be important to ensure connectivity with Reading Borough is provided which must be acknowledged in the policy. This connectivity would be for all modes of transport, including walking, cycling together with the private car.</p>	<p>As above, the Council does not propose to endorse particular development in adjoining authorities unless it is a part of a joint approach with those authorities. This land is not identified within the South and Vale Local Plan and it is not considered appropriate for the Local Plan Partial Update to endorse it. However, not identifying land for development does not prevent it coming forward through the planning application route, and the Local Plan Partial Update does not place additional constraints on this land over and above any already in existence.</p>
<p>Woolf Bond Planning (OBO Fairfax Reading)</p>	<p>Omission Site: Land West of Kidmore End Road, Reading</p> <p>Consistent with our comments in this statement, our clients are promoting residential development on the part of the former Reading Golf Club south of Cucumber Wood.</p> <p>The section of the wider site which lies within Reading Borough has detailed planning permission for the erection of 223 dwellings (LPA ref 220390). The approved layout is shown below, with construction underway by Vistry.</p> <p>Whilst our clients have submitted representations to the emerging Joint Local Plan being prepared by South Oxfordshire District and the Vale of White Horse District promoting the land on the former Golf Club (south of Cucumber Wood) for the erection of around 100 dwellings, it is also necessary to simultaneously also advocate its suitability to Reading borough. In doing so, it is noted that it could have an important role in addressing the identified unmet needs of the borough, in a</p>	<p>See previous responses.</p>

	<p>location which is readily accessible to the services and facilities in Reading, as confirmed by the Council's approval of the planning applications.</p> <p>In promoting the land to Reading Borough, the enclosed Development Strategy Plan (Drawing 2209/PR.04 Rev C) (Appendix 2) (below) indicates that a number of connections (vehicular and pedestrian) are proposed into the site, which cross the boundary between the two authorities. Through these submissions, we highlight the need for the emerging Plan to avoid measures that would hinder this connectivity.</p> <p>Although the submissions to South Oxfordshire District will highlight the suitability and sustainability of the land at the former Golf Course in contributing towards meeting their own housing needs, it also has a role towards those arising in Reading Borough.</p>	
<p>Savills (OBO Beechcroft Developments Ltd)</p>	<p>Regarding Policy CA2 – Caversham Park Site</p> <p>Beechcroft disagree with the conclusion of the Review of the RBLP, on the basis that the Planning and Listed Building applications have demonstrated that there are opportunities to accommodate a greater scale of development at Caversham Park than is stated in RBLP Policy CA2. CA2 is also overly restrictive in its present form as it precludes development that, '<i>will negatively affect the significance of heritage assets and their setting</i>', without offering a balancing exercise against public benefits as guidance within the NPPF (2021) states at paragraph 202. In addition, this also makes Policy CA2 inconsistent with the Council's own Adopted Local Plan Policy EN1 (as discussed in detail in the next section of this submission). The Policy must therefore be updated as part of the Review of the RBLP.</p> <p>There is a shortage of housing for the elderly within Reading Borough and with a national background of an aging population. The Site presents an ideal opportunity to deliver new housing for older people with differing levels of care needs through the sensitive conversion and reuse of the main house, a care home adjacent to the Main House, and new development on other areas of the Park and Garden. The area outside of the Park and Garden, adjacent to Peppard Road is well suited to delivering much needed family and affordable housing, both of which are in short supply in the Borough. The detailed work carried out in support of the Planning and Listed Building applications and soon to be submitted amendments (taking account of officer advice given in May 2022), provides robust evidence of the quantum of development that could be delivered at the Site and Policy CA2 should be amended to reflect this. The wording for the Policy and its supporting text should also be revised more generally to take account of the detailed understanding of the House and Park and Gardens as presented in the Heritage and Landscape supporting documents for the Applications. An approach to the re-drafting of Policy CA2 considering the above is recommended in the final section of this submission.</p> <p>See section 70(2) of the Town and Country Planning Act 1990 and 38(6) of the Planning and Compulsory Purchase Act 2004. See NPPF paragraphs 200 and 202 See RBLP Policy CA2. RBLP Policy EN1 relates more generally to the protection of the historic environment with importance placed on the conservation of existing assets.</p> <p>Where harm to a heritage asset is identified, Policy EN1 allows justification of this by identifying associated public benefits in the same way that the NPPF sets out at paragraph 202. This is a very important material consideration in the circumstances.</p> <p>Whilst Policy CA2 does not expressly allow for the weighing of public benefits of a scheme against heritage harm, Policy EN1 does. Policy EN1 adopts an approach that reflects paragraph 202 of the NPPF. This is also consistent with the Court of Appeal Bramshill decision, which states that a policy does not '<i>preclude a balancing exercise as part of the decision-</i></p>	<p>No change proposed. The development at Caversham Park now has a resolution to grant permission subject to S106. This was achieved by careful weighing of considerations for this important asset in line with the policy. Updating the policy is not considered to be necessary given the point in the planning process and the fact that any alternative proposal should correctly need to be considered against the matters outlined in the policy.</p>

<p><i>making process</i> nor does it, <i>override the NPPF policies or prevent the decision-maker from adopting the approach indicated in them</i>.</p> <p>Policy CA2 in its current form is therefore flawed on the basis that it does not expressly allow a balancing exercise between harms and public benefits, instead simply stating that <i>'No development will negatively affect the significance of heritage assets and their Setting'</i>. This creates the conflict with local and national guidance as identified earlier in this submission. To address the conflict Policy CA2 must be reviewed as part of the Local Plan Review and suggested wording for this is set out in the final section of this submission.</p> <p>See PPG Paragraph: 017 Reference ID: 3-017-20190722.</p> <p>Accordingly, below we provide a summary of the suitability, availability and achievability (including economic viability) of the Site to accommodate proposed residential development.</p> <p>The Site has been identified and included in the current adopted Local Plan for development and has been the subject of interest for its development for several years, culminating in the present Planning and Listed Building applications noted in the introduction above. The Site remains sustainably located and is entirely suitable for development, subject to planning and Listed Building approval.</p> <p>As set out above, the use of the existing office building at the Site has become surplus to the needs of the BBC. The Site is therefore available for redevelopment. Owing to the highly sustainable location of the Site within the settlement limits of Reading, close to local services and sustainable transport provision, the Site is well-placed to accommodate a new residential development, to support increasing local housing needs, especially for those with vulnerable needs – meeting the identified shortfall in this type of housing in the Borough.</p> <p>The Site is subject to a number of heritage constraints and the Planning and Listed Building applications submitted to the Council have been carefully developed to demonstrate that a comprehensive scheme for redevelopment of the site is achievable, providing an opportunity to deliver much needed housing for the elderly with differing levels of care offered to meet their needs.</p> <p>The delivery of a high-quality development is therefore achievable now.</p> <p>The Site has been identified for development within the adopted Local Plan (2019) (Policy CA2) and is subject to pending Planning and Listed applications for re-development of the site.</p> <p>The Site has great potential to provide over 150 homes to vulnerable residents to meet their increasing needs as well as providing an onsite care home. The proposals seek to incorporate 30% on-site affordable housing with a mix of unit sizes including 1, 2 and 3-bed houses and apartments. The site would provide a suitable density of the development for the setting of the Registered Park and Garden and Listed Buildings, making the vast majority of the parkland accessible to local residents for the first time.</p> <p>The level of development currently proposed would have a lower impact on local highways infrastructure than the existing lawful office use of the site. Meanwhile, the onsite care provision, including the care home and assisted living units would reduce the impact to local GPs for residents. As such, there are not anticipated to be any negative impacts or abnormal infrastructure costs which would prevent the Site from delivering much needed housing in a timely manner.</p> <p>In light of the above, we request that the Local Plan Review supports the development potential of the Site to accommodate the level of development proposed under the present applications, which has been fully evidenced by the</p>	
---	--

	<p>supporting documentation to the live planning applications (ref 220409 & 220410 respectively). Furthermore, Policy CA2 should be re-drafted in light of the additional knowledge on the history of Caversham Park and to bring it in line with paragraphs 200 and 202 of the NPPF (2019) and existing Policy EN1 of the adopted Reading Local Plan (2019). It is therefore recommended that Policy CA2 is redrafted as follows:</p> <p>CA2: Caversham Park (suggested revised text) <i>Caversham Park and Caversham Park House are key features of the heritage and landscape of Reading. Caversham Park is a Registered Historic Park and Garden, and the site contains a number of listed features. Conversion of the house from offices to residential and/or a cultural, community or heritage use, or other suitable use compatible with its heritage, will be acceptable in principle subject to a more detailed historic assessment of the building and the precise mix of uses. There is scope for additional development on previously developed and/or other land within the site, which will need to be justified at application stage. Any impact on heritage assets should be assessed in accordance with national policy. Any development or conversion proposals should open as much of the park as possible up to public access, including reinstatement of any historic public footpaths where possible and appropriate.</i></p>	
--	--	--

Q.78 Do you agree with the proposed changes to the existing allocated sites in East Reading? Do you want to see any other changes?(This question relates to policy ER1)

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Stantec (OBO UoR)	Other	The University has no comments regarding the amendments to the wording of this policy to ensure it is up to date. However, it supports the continued inclusion of ER1c Land Rear of 8-26 Redlands Road and ER1e St Patrick’s Hall, Northcourt Avenue as allocations for residential development and student accommodation respectively.	Answer is noted. No changes needed.

Q. 79 Do you have any comments on the potential additional allocation to policy ER1?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Anthony Acka’a	N/A	Strongly support, less parking discourages car usage.	Answer is noted. No changes required.
The Woodland Trust	N/A	Upper Crown Street would benefit from increased tree cover	Answer is noted. No changes needed. Tree coverage will be assessed at application stage in accordance with policy EN14 and to the Council’s satisfaction.

Additional representations submitted via email regarding potential additional allocations to policy ER1

Respondent name	Comments	RBC Officer Response
Katesgrove Community Association	<p>Regarding 9 Upper Crown Street, EAS1 Residential use is appropriate, but any development should be proportionate to its location not overlooking adjacent small terraced houses.</p> <p>KCA would support RBC option 2</p>	Noted. This is outside of the scope of the Local Plan as the site has already obtained planning permission.

<p>Woolf Bond Planning</p>	<p>Land at 9 Upper Crown Street, Reading*</p> <p>There is currently a pending application for the erection of 46 dwellings on the site (LPA ref 230814/FUL) which the Council's Planning Applications Committee on 4th October 2023 resolved to approve. As a starting point, the site should be allocated for this level of development as a minimum.</p> <p>The officer's report indicates that the Council accepts a form of residential development on the site which equates to at least 131 dwellings per hectare. This is within the range acknowledged for urban areas in Table 8.1 of the Partial Update.</p> <p>As indicated on the extract of the current Proposals Map (extracted below), the site at 9 Upper Crown Street adjoins the boundary of the town centre (or 'central area'), relevant to the application of Policies CR1-10 in the current Plan.</p> <p>Whilst the Council (paragraph 12.2) indicates that the boundary of the town centre (or central area) is considered up to date, there is logical potential for adjustment in this location. It is noted that five storey development lies directly adjacent to the site's western boundary and further four storey development is now approved adjacent to the site's central western boundary. An amendment to the town centre (or central area) boundary could therefore be undertaken as shown using a dashed red line as illustrated below:</p> <p>The '3' (85 to 89 Southampton Street) and '5' (95 to 107 Southampton Street) annotations refer to the storey heights associated with the buildings immediately west of the 9 Upper Crown Street site. This scale alongside the up to 5 storeys that is subject to a resolution to grant planning permission on the 9 Upper Crown Street site comprises a scale that is commensurate with the heights found within the town centre (or central area) boundary to the immediate north of the site. It is therefore logical to extend the town centre (or central area) boundary in this location to take in the area indicated shown a dashed red line on the above plan. It is therefore suggested that the boundary of the town centre (or central area) is reviewed in this location, where land such as that at 9 Upper Crown Street has been promoted to enable a denser form of development that could be accommodated on the site.</p> <p>The 9 Upper Crown Street site's relationship with adjoining existing and committed development (as illustrated in the internal site elevations for the scheme (below)) indicates that there is scope for a taller building on the site, providing an additional floor of accommodation, especially on proposed buildings 2 and 3.</p> <p>The provision of an additional floor on buildings 2 and 3, alongside reconfiguration of the floorplates to adjust the sizes of dwellings could increase the number of dwellings envisaged from 46 to circa 56 units. As can be viewed on the internal cross section drawing above, such a height would still remain consistent with buildings located immediately to the north and west of the site. In addition, the dwelling mix could be reconsidered to accommodate a slight uplift in the site's development capacity.</p> <p>It is therefore proposed that the Land at 9 Upper Crown Street, Reading site is allocated for circa 56 dwellings in the Local Plan review alongside its inclusion within an adjusted town centre (or central area) boundary. Applying such adjustments to this (and other) sites to increase the overall expected supply from urban sites in the new Local Plan review to meet the local housing need figure and comply with the requirements of the most recent NPPF as referred to in section 2 of this representation above. Such a strategy would reduce the current anticipated housing shortfall and demonstrate how the Council is actively seeking the efficient use of land as required by the NPPF.</p> <p>We endorse the identification of the land at 9 Upper Crown Street as a housing allocation in the Partial Update (Site Ref. Eas1). The Council's resolution to approve pending application 230814/FUL for 46 dwellings is a clear illustration that it can accommodate this level of housing as a minimum.</p>	<p>No change proposed. This site now has a resolution to grant permission subject to S106 and is to be developed at a level that optimises the site's capacity. As it is not considered that additional development is likely to be appropriate, it is considered that the site does not need to be allocated as it will be added to the list of existing permissions.</p> <p>There is no need to extend the town centre boundary in order to achieve a high density development. This boundary does not form a cliff-edge of density, and the appropriate density will depend on the circumstances of individual sites.</p>
----------------------------	--	--

	*Maps, drawings and additional information submitted with representation is found within the original PDF that contained the comments.	
Nexus (OBO Reading Heights Ltd)	Queens Road / Watlington Street For the Site on the corner of Queens Road / Watlington Street, Reading Heights is progressing a coliving scheme that could accommodate 107 private studios plus high quality communal facilities. This would be equivalent to 59 dwellings on the Site (at a ratio of 1.8:1). Following these representations, Reading Heights intends to present a co-living led placemaking / vision for the Site, through further submissions to the plan making process, and to seek an allocation for such development (whilst not excluding an alternative Class C3 scheme) in the emerging Local Plan.	Noted. This site is subject to an outstanding planning permission, and is recognised as such in the table. An alternative proposal will need to be justified on its own merits.
Thames Water	Site Name: Site Eas1: Land at 9 Upper Crown Street Net gain to system (/day): 30967.2 Net foul water increase to system (l/s): 0.36 Net property equivalent increase – waste: 29 Net increase in demand (l/d): 16100 Net increase in peak demand (l/s): 0.56 Net property equivalent increase – water: 46 Water response: On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	No change proposed. This site now has a resolution to grant permission subject to S106 and is not proposed to be taken forward as an allocation.
Environment Agency	Site Name: Land at 9 Upper Crown Street Site Constraints (Flood risk, water environment, biodiversity and ecology, groundwater and contaminated land): FZ1. Secondary superficial aquifer A, secondary bedrock aquifer A Chosen option and requirements: Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK (www.gov.uk	Noted. No change needed. This development now has planning permission.

Q. 80 Do you agree that we should update policy ER2 regarding Whiteknights Campus as described?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
TVCC	Y	In relation to this question, and section ER2, we welcome the proposal to update policy ER2 to reflect the University's current plans and strategy. As one of the region's 'anchor institutions' we understand the University's needs and objectives are constantly evolving, and it is important that the planning policy for Whiteknights Campus reflects this and enables the University to be best placed to continue their investment. We support the University's own submission and refer you to the more detailed points they make - inter alia – we recommend that the supporting text be updated in several areas, including referencing their forthcoming Estates Strategy.	Noted. No change needed.

		We encourage the Council's continued engagement with the University on these matters prior to the next stage of the consultation.	
Stantec (OBO UoR)	Other	<p>The University welcomes the proposal to update policy ER2 to reflect the University's current plans and strategy. The University's needs and objectives are constantly evolving, and it is important that the planning policy for Whiteknights Campus reflects this.</p> <p>The University has published its Net Zero Carbon Plan 2021-2030, and in accordance with this will be pursuing related projects some of which may require planning permission. It is suggested that the scope of policy ER2 includes an allowance for such development relating to the decarbonisation of the University's estate.</p> <p>The supporting text for policy ER2 will therefore need to be updated to refer to the University's current plans and strategies, including the Net Zero Carbon Plan 2021-2030. The text relating to student growth will also need to be updated.</p> <p>The University is in the process of finalising the detailed Estate Strategy which covers the period to 2032. This is a strategy that outlines how the Estate will respond the four University strategic principles set out in the Strategic Plan of Community, Excellence, Sustainability and Engaged University.</p> <p>The Estate Strategy sets out a vision to create 'The University in a Park' and focuses on maximising value from our existing estate. This is achieved by refurbishing the existing estate such that legacy buildings can be re-purposed to deliver the modern academic facilities required to maintain a competitive University experience. Key ideas in the Strategy include the creation of a campus heart to act as the focal point - a magnet drawing activity into the centre of the Whiteknights Campus, the refurbishment of the iconic URS Building to allow the University to grow sustainably and remove short term temporary buildings from campus.</p> <p>There is a strong focus on making the Estate inclusive through a programme of accessibility and boundary improvements. These feed into a wider programme of works considering the campus landscape and open spaces which looks to protect the parkland feel of the University campuses whilst addressing needs around active travel and broader community engagement.</p> <p>The University would suggest that the supporting text refers to the Estates Strategy which will be published in due course. The University is also in the process of preparing updated information and strategic documentation relating to its position on future student numbers and student accommodation. The University looks forward to engaging with the Council on these matters prior to the next stage of consultation on the Local Plan to allow the supporting text to policy ER2 to be updated accordingly.</p>	Agreed. Change proposed. The Estates Strategy has not yet been published, but the supporting text should be amended to refer to the key information about its content in this submission, and the policy should be updated to refer to development for the University's zero carbon ambitions.
The Woodland Trust	Y	Agree that the purposes of meeting sustainability goals should be specifically referenced	Answer is noted. No changes required.

Additional representations submitted via email regarding the University of Reading/policy ER2

Respondent name	Comments	RBC Officer Response
Earley Town Council	ETC notes the comments about the development on the University of Reading campus and has significant concerns that any substantial increase in student numbers, without suitable and sustainable vehicle parking arrangements, would have a concomitant knock-on effect on random on-street parking across roads in Earley, which border the University. Significant problems already exist in Aldbourne Avenue, Falstaff Avenue and Hartsbourne Road.	Noted. No change needed. The policy is not proposed to facilitate any substantial increase in student numbers.

Berkshire Gardens Trust	We ask that policy ER2 development criteria is also updated to include Whiteknights' role as a locally important historic park with a number of listed parkland buildings and structures. We urge the council to consider listing the surviving parts of the parkland as a locally important historic park to match Wokingham's inclusion of their part of the campus as a local heritage asset.	Noted. No change needed. There is a separate process for local listing of heritage assets which is outside the Local Plan.
-------------------------	--	--

Q. 81 Do you agree that we should update policy ER3 regarding Royal Berkshire Hospital as described?

Respondent name	Y/N/Other	Comments	RBC Officer Response
James Ford	Other	Close the hospital, sell the site to Reading FC & relocate it with a view to provide a more resilient environment within which to provide the core service required. Above the new sea level, with staff accommodation, parking, transport links, modular design etc. Throw a match on the museum currently in use.	No changes proposed. The Hospital is not owned by RBC and its sale is beyond the scope of planning policy. Should RBH move elsewhere, there is a strong preference from the Council for the site to continue to meet healthcare needs albeit with some flexibility.
R K Lambra-Stokes	Other	It should be made clear that there is exceptional public service infrastructure supporting the current site. It should also be made clear that the council will support the Hospital should they chose to redevelop the current site. Eg. Staged redevelopment would likely reduce or remove carpark space and the council will support temporary carparking and/or park and ride solutions.	Noted. The proposed policy makes clear that the Council would support the Hospital remaining on-site. It is outside of the scope of the Local Plan to address plans for temporary car parking or temporary park and ride schemes.
Henry Wright	Y	Support the hospital remaining in Reading on a redeveloped site. Free housing should be provided on the new site for trainee doctors and nurses as in the recent past. This would improve recruitment.	Noted. It is outside of the scope of the Local Plan to allocated no-cost housing to residents.
Ofuase Dirisu	Y	Yes I agree with updating this. I strongly believe that the hospital should remain on the original site. A real issue is parking for especially staff and the shuttle bus has not proved to be a great alternative. If the hospital were to move to shinfield, access through public transport would likely to be harder. I think providing better quality and more accommodation to nurses and doctors training at the Royal Berks would help recruit talent from an already competitive deanery.	Noted. The proposed policy seeks to retain the Hospital onsite. Providing accommodation for nurses and doctors is outside the scope of the Local Plan.
Paul Oliver James Melville	Other	there should be a new build modern hospital either by the M4 or at Green Park. The latter has excellent transport facilities.	Noted. No change proposed. The policy identifies considerations for alternative sites if the Hospital is to be relocated.
Nicholas Gumbridge	Y	Strongly agree with keeping the hospital in Reading itself.	Answer is noted. No changes needed.
Louise Acreman	Y	RBH should definitely remain in the centre of Reading on the current site. A hospital should be sited central to the population it serves. Build up if you need to, there is enough land to grow the hospital for future needs on the current site. If the hospital was moved out of town it would become less accessible for lots of people, increase traffov as people could no longer be able to walk or cycle and increase deaths ultimately.	Answer is noted.
Damians Bramanis	Y	This is an important location for community needs	Answer is noted. No changes needed.
Historic England	Other	We support the proposed changes, subject to seeing the detail and would happily discuss this site further as needed to ensure a good outcome for this important building (the main block and flanking wings being Grade II*). We wonder if a development brief might prove a helpful tool in guiding the future of this site, especially if more significant, phased redevelopment is expected.	Noted.
TVCC	Y	We agree. The Royal Berkshire Hospital is on the Government's New Hospital Programme, as a new hospital for the County is required. We know that the ageing estate places a significant strain on requirements of the Hospital	Answer is noted. No changes needed.

	to maintain (existing) and large parts of the site do not currently meet standards for future space requirements to deliver state of the art healthcare. Through this Plan, and its wider policy priorities, the Borough Council, must continue to take every step to enable the Hospital to deliver its priorities for meeting its future needs and ensure Berkshire has a hospital fit for purpose for the 21st century. We support the Royal Berkshire's own submission and refer you to the more detailed points they make.	
--	---	--

Additional representations submitted via email regarding Royal Berkshire Hospital/policy ER3

Respondent name	Comments	RBC Officer Response
Earley Town Council	If RBC considers that the current location of the Royal Berkshire Hospital is the best place for it, then RBH needs to deal with the current parking issues and lack of parking for both staff and visitors urgently. Many out-patients have mobility issues that mitigate against their use of public transport and/or may live in locations poorly served by public transport. ETC would further support RBH and RBC giving future consideration to an alternative site for the hospital.	Noted. No change proposed. It is not within the scope of the Local Plan to remediate existing parking issues. Should the Hospital redevelop onsite or move elsewhere, transportation would be a key consideration.
Berkshire Gardens Trust	We welcome the changes in policy for ER3: Royal Berkshire Hospital and the reference to the heritage value of the area. The historic balance of built form and mature gardens is an important aspect of the surrounding area which should be protected.	Answer is noted. No changes needed. The policy updates will require the site to expand in such a way that does not cause negative impacts to the local area, including local heritage.

13: Infrastructure delivery

Q. 82 Have all the relevant areas of infrastructure been correctly identified?

Respondent name	Y/N/ Other	Comments	RBC Officer Response
Christian Harris	N	Why is there no flyover for cemetery junction	Suggesting specific highway infrastructure is outside the scope of the Local Plan, but the Local Plan has been drafted with significant input from infrastructure providers. There is no proposal for a flyover at Cemetery Junction at this time.
Thames Water	No Answer	<p>We generally support the reference to water and wastewater infrastructure, but it is such an important issue that it should be covered in a separate 'Water Resources and Wastewater Infrastructure' policy in the new Local Plan and that it should be improved in line with the following detailed comments:</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure.</p> <p>See Paragraph 11, 20, 28 and 26 of the revised NPPF (NPPF), 2021, The NPPG includes a section on 'water supply, wastewater and water quality' (Paragraph: 001, Reference ID: 34-001- 20140306).</p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments.</p> <p>Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it</p>	<p>Noted. It is considered that water and wastewater is sufficiently covered by CC9, EN16 and EN18 and it is unclear what additional benefit a new policy would bring. The language in suggested policy text is already included within the draft, albeit under separate policies and site allocations.</p> <p>Throughout the Local Plan, developers are urged to consider water and wastewater demands through discussions with Thames Water at the earliest stages of applications. Significant lead times required have been noted both within the Local Plan Draft and the Draft Infrastructure Delivery Plan.</p>

	<p>is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.</p> <p>As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges. Paragraph 10.70 should therefore be amended accordingly.</p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> • The developments demand for water supply and network infrastructure both on and off site; • The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and • The surface water drainage requirements and flood risk of the development both on and off site and can it be met. <p>Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements.</p> <p>In light of the above comments and Government guidance we consider that the New Local Plan should include a specific policy on the key issue of the provision of ‘Water Resources/Supply and Sewerage/Wastewater Infrastructure’ to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We therefore recommend that there is a separate policy to cover both ‘Water Resources & Wastewater Infrastructure’.</p> <p>PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT: <i>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</i> <i>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</i></p> <p>Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies’ AMP8 Business Plan will be agreed with Ofwat during 2024.</p>	
--	---	--

		<p>Hence, a further text should be added to Policy as follows: “The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”</p> <p>Development within the vicinity of Sewage Treatment Works and Sewage Pumping Stations The new Local Plan should assess impact of any development within the vicinity of existing sewage works/sewage pumping stations in line with the Agent of Change principle set out in the NPPF, paragraph 187. Where development is being proposed within 800m of a sewage treatment works or 15m of a sewage pumping station, 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/pumping station. See paragraph 174 and 185 of the NPPF, February 2021 See PPG paragraph: 005 Reference ID: 34-005-20140306 The odour impact study would establish whether new resident’s amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. On this basis, text similar to the following should be incorporated into a policy of the Local Plan: “When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.”</p>	
Sport England	Other	For clarity on leisure, should this not say built sports facilities and playing Pitches?	It is unclear what additional benefit this would bring.
Historic England	Other	We welcome reference to culture and tourism in this context and the broad thrust of the culture and tourism scheme on page 103. That said, we query if the challenges facing Reading Abbey Scheduled Monument could be recognised in this programme of work, ultimately aiming to see the Scheduled Monument removed from the national Heritage at Risk Register. Given the importance of cultural infrastructure, it would be reasonable to expect the Council’s approach to aim at least to maintain existing levels of cultural assets that exist within the city, and to seek improvements to secure the long-term future of assets classed as ‘at risk’.	Noted. Works address the Reading Abbey are included in the table.
TVCC	Y	<p>We believe so. However, we wish to emphasise the point that, from our direct experience of supporting companies wishing to invest into Reading, and the wider Thames Valley, the ability to provide the right amount of power supply and at the appropriate time is severely restricting, and in some cases damaging, investment capability. In essence the region simply doesn’t have sufficient power (especially electricity) to meet present and future demand.</p> <p>The ability to deliver the power requirements business requires in a timely and efficient manner - that doesn’t restrict slowdown investment – must be paramount focus for the Council / this Local Plan.</p>	Noted. The IDP aims to emphasise the importance of working with electricity providers to ensure that the proper capacity is available to enable and serve development throughout the plan period. This is clearly stated in the table itself and in the accompanying Infrastructure Delivery Plans.
The Woodland Trust	Y	Strongly support the addition of biodiversity to the infrastructure categories. This will be vital for securing the delivery of local nature recovery strategies and addressing the nature and climate crises.	Noted.
M Langshaw	Other	Probably, although there is no allowance for places of worship.....	No change proposed. It is considered that places for worship are not public infrastructure.

Q. 83 Do you have any comments on the draft IDP schedule?

Respondent name	Y/N/Other	Comments	RBC Officer Response
Thames Water	N/A	See response to Q.82	See response to Q 82.
Damians Bramanis	N/A	There is a clear need for expanded GP and urgent care facilities, which are at their breaking point at the moment. Particularly given the dramatic increase of housing in central Reading, this is increasingly important.	Noted. Healthcare provision is proposed to be given the highest priority consideration in Policy CC9 and this plan has been informed with significant and ongoing discussions with the NHS.
Sport England	N/A	We are assuming that there is to be a robust evidence base for the infrastructure requirements. If this is the case, there is a need to complete a built facilities strategy (BFS) and over haul the existing current playing pitch strategy. In the absence of a BFS RBC could use Sport England's Sports Facility Calculator: https://www.activeplacespower.com/reports/sports-facility-calculator	Noted. The requirements listed in the table have been informed by discussions with RBC Leisure. Significant improvements have been made to leisure provision within the Borough in recent years. The current playing pitch strategy was published in Nov 2021 and is considered to be up to date.
The Woodland Trust	N/A	Support inclusion of the Biodiversity Action Plan and Local Nature Recovery Strategies. Suggest adding the Tree Strategy.	Noted. Reference to the Tree Strategy is now included in the IDP draft.
M Langshaw	N/A	Generally ok, but, particularly before there is a design guide in place, there is a need for all the different requirements of the Local Plan to be knitted together in a way that makes Reading a place, not just an agglomeration of sites. To encourage Reading to be a desirable place to be, this knitting together also needs to include walking and cycling routes threaded through the town.	Noted. The IDP table specifies implementation of the Local Walking and Cycling Infrastructure Plan (LWCIP).
Environment Agency	N/A	Schedule - Biodiversity Action Plan and Local Nature reserve Strategies We have reviewed Table 13.1- IDP Schedule, and note the details provided regarding infrastructure relating to the Biodiversity Action Plan and Local Nature reserve Strategies. We advise that the LPA includes details about the eradication of invasive species as part of scheme requirements, as they can be a serious barrier to nature recovery. In addition, information should be included which ensures the promotion of the use of native species to increase diversity. IDP Schedule - Water and wastewater infrastructure We have reviewed Table 13.1- IDP Schedule, and note the details provided regarding infrastructure relating to Water and wastewater infrastructure. At the moment it is assumed that the wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW) and so we have provided comments below for your awareness of the situation at the Reading STW and the need to consider (which will include engagement with Thames Water) the below and how it affects development on the allocated sites in this partial update of the local plan. - Reading STW has a maximum permitted flow of 177,725 m3/d. In 2022 the maximum flow was 105,282m3/d and the average 63,752 m3/d. In 2021 (which was a wetter year) the maximum and average recorded flows were 128,663m3/d and 69,339 m3/d respectively. This suggests there is some capacity within the existing discharge permit for new development.	Noted. Change proposed to encourage the eradication of invasive species and the promotion of native species. Concerns about the capacity at Reading STW are noted and have been passed to Thames Water for comment. Thames Water has reiterated that they are aware of the issues and are currently considering design solutions to be implemented during the next Asset Management Plan Period (AMP8) 2025 – 2030. RBC will continue to liaise with Thames Water to ensure that the proper wastewater infrastructure is in place to enable development.

	<ul style="list-style-type: none"> - The Environment Agency would like to convert the maximum flow value of the permit to a Dry Weather Flow (DWF). This is the standard and preferred method for Environmental Permits and helps us more accurately measure compliance. It is important that Thames Water engage with the Environment Agency as soon as possible to make this permit alteration. - The storm overflow setting (sometimes known as the Flow to Full Treatment (FFT)) at Reading is 1572 l/s. This is likely below the 3PG+iMax+3E (or 3xpDWF) advised minimum standard for overflows for the population served. This means that additional development could increase the risk of storm overflows either in wet or dry conditions. Over the past 3 years Reading STW has been a relatively low spilling site, but we would want assurances from Thames Water that additional development will not cause this site to become a frequent spiller. - The permitted storm tank capacity at Reading is 11,333m³, however a recent compliance assessment report identified the available storm tank on site to be 13,098 m³. Environment Agency guidance states that STW should have storm tank capacity of 68 litres per head of population served. The Population Equivalent at Reading STW for the 2022 compliance year (2023 data not available at time of writing) was 210,585. Therefore, the storm tank capacity available should be around 14,300 m³. This is not significantly more than the available storage on site, however, if the storm tank size is not increased to keep pace with growth within the catchment, the risk of storm discharges that have not benefited from storm tank settlement will increase, which will potentially further deteriorate the receiving waterbody. - The Environment Agency visited Reading STW in June 2023, and the visit resulted in Thames Water being issued a Compliance Assessment Report (CAR) form in which several permit breaches were recorded. Most notably is that Reading STW seems unable to handle incoming flows during wet weather and engages in a practice called 'flow clipping' to ensure compliance with regulatory sampling. This is considered a serious breach of an Environment Permit as it sends incoming flows to the storm tank before the permitted FFT has been reached in order to ease the pressure on the STW process. Until these issues are resolved, any additional flows arriving from new development will increase pressure on Reading STW's process and risk flows being discharged to the storm tanks and/or the environment in breach of the permit. This poses a significant environment risk. The CAR form (which is in the public register) identifies actions for Thames Water to take to come back into compliance at Reading STW. As a minimum the Environment Agency would expect these to be completed before any new developments are connected to the sewerage network. - Other breaches were identified in the CAR form and need to be resolved. - In the documents provided there are comments from Thames Water highlighting capacity issues, particularly in South and West Reading. My assumption is that these capacity issues are with the sewerage network and/or any network pumping stations. Any additional flows into an under-capacity network can lead situations such as rising main or pumping station failures, which can cause significant environmental damage. Improvements must be made to the network to ensure these events occur before new developments come online. 	
--	---	--

Additional representations submitted via email regarding IDP

Respondent name	Comments	RBC Officer Response
National Highways	<p>We have also reviewed the draft IDP document provided. Although none of the schemes mentioned within this directly impact our network, any transport schemes which add or relocate traffic to the SRN should be sent to National Highways for consultation when further details come forward.</p> <p>To ensure that the Local Plan is deliverable, a transport evidence base should be developed and demonstrate the Local Plan impact on the SRN and as necessary identify suitable mitigation. 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 identified growth is planned. Once the transport impacts of the Local Plan sites are understood, the IDP document should set out any SRN mitigation required to deliver the Local Plan development.</p> <p>National Highway supports Reading Borough Council's commitment to work with partners to consult on potential developments coming forward within the borough. We look forward to continuing the ongoing work with all parties to identify and produce a robust transport strategy which would inform the size and scale of development deliverable within Reading up to and beyond the Local Plan process.</p>	Noted. Detailed transport modelling will accompany draft in the next stage of consultation.
Earley Town Council	<p>ETC is concerned with comments under the draft infrastructure delivery schedule on page 101, which states there is "<i>unlikely to be a significant need for additional primary and secondary places</i>" without any evidence. Secondary schools in the eastern side of Reading are already heavily oversubscribed with students from the Reading Borough area being accepted by schools in Wokingham Borough areas, displacing Earley resident's children eastwards, with attendant high transport costs and effects on afterschool activities.</p> <p>In addition, the increase in students with Education, Health & Care Plans (EHCP) seems to be undergoing almost exponential growth.</p>	<p>Do not agree. No change proposed. Admissions policies for individual schools within neighbouring boroughs are not within the scope of the Local Plan. Some cross-boundary attendance is to be expected. RBC's own evidence and analysis of pupil numbers and development projections have determined that demand for secondary places is slowing. Forecasts currently indicate that there are sufficient secondary school places to meet demand to 2029/2030 in all year groups. The opening of River Academy in Sept 2024 has provided a new 8-from entry secondary school within the Borough.</p> <p>The significant increase in SEND needs is noted and is specifically outlined in the IDP table.</p>
OCC	<p>The partial review states that "<i>only infrastructure needed to support sustainable growth has been identified within the following schedule</i>" and provides a table of Infrastructure Delivery Plan schemes. The list includes the Cross Thames Travel scheme which is wholly outside of your local authority boundary, and as such should not be considered as a fundamental infrastructure requirement to deliver RBC's growth.</p> <p>Given our response to the Reading Borough Council's Local Transport Plan 4, dated 20th December 2023, which raised serious concerns about proposed schemes and measures for cross boundary travel, it is further concerning that a third Thames Crossing is listed within the draft Infrastructure Delivery Plan. We would take this opportunity to further repeat our significant concerns around proposed schemes and measures for cross boundary travel.</p>	<p>No changes proposed. As set out in the Local Transport Plan (2040), RBC is aware of OCC's preferences and is currently undertaking joint working on this matter.</p> <p>Although the location for the third Thames crossing is situated outside of the RBC boundary, it is of relevance given that it would significantly affect transport movements within the borough. In addition, a collaborative approach between local authorities is considered to be the best way forward.</p>

Appendix 13: Summary of responses to social media promotion

Comments were received on social media in response to promotional posts regarding the Scope and Content public consultation via RBC's main social media accounts such as LinkedIn, Facebook and X. Comments on such platforms were not in accordance with the representation format set out for this consultation. Nevertheless, a summary of the comments received and the topic area in which it relates to is set out below. In general, comments comprised:

- Reference to the limited infrastructure and capacity to manage growth, in particular establishing sufficient infrastructure before housing comes forward and managing the traffic in the town;
- Both concerns regarding the number of high-rise flats in the town, as well as a desire for additional tall buildings;
- Requests for additional leisure experiences within Reading;
- Comments on how climate change can be addressed through development;

Other comments were received that were outside the scope of the LPPU, including, for example, timings on waste collection and highway/transport matters.