

LOCAL PLAN PARTIAL UPDATE BACKGROUND PAPER

**Information to support the Submission
Reading Borough Local Plan Partial Update**

May 2025

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1. Introduction

- 1.1 The Local Plan Partial Update and Proposals Map will, once adopted, set out the planning policies for Reading Borough to 2041. The National Planning Policy Framework (NPPF) (December 2023) states that the preparation and review of Local Plans should be:

“Underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.” (paragraph 31)

In order to be found sound (see paragraph 3.6.1), a Local Plan will need to be justified, which involves being based on proportionate evidence.

- 1.2 Planning Practice Guidance (PPG) provides further detail on assembling an appropriate evidence base to support a Local Plan. Paragraph 038 states that:

“Policies need to be justified. Evidence to underpin policies can be taken from a wide variety of sources, including the Authority Monitoring Report and planning application and appeal decisions. Strategic policy-making authorities will need to consider carefully the need to commission evidence that will add delay and cost to plan production. Wherever possible, authorities may wish to prepare evidence in-house or jointly to speed up the process and obtain best value for the taxpayer. Strategic policy-making authorities may wish to seek advice on this, for example, from the Planning Advisory Service as part of their ongoing plan-making support.

The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. Strategic policy-making authorities may wish to consider ensuring that their assessment of and strategies for housing, employment and other uses are integrated, and that they take account of relevant market signals.”

- 1.3 This paper is therefore a key part of the Council’s evidence base and addresses the matters above, fulfilling the requirements of section 19 (2) of the Planning and Compulsory Purchase Act 2004.
- 1.4 This paper makes references to the December 2023 version of the NPPF in line with the requirements set out in the 2024 version of the NPPF, which states in the paragraph 230 that the updated version applies from 12 March 2025, unless plans reach Regulation 19 stage on or before 12 March 2025. As such, in accordance with Annex 1 of the NPPF, this plan is assessed on the basis of the December 2023 version of the NPPF.
- 1.5 This paper does not represent the complete evidence base. The full evidence base comprises a wide range of documents which have been submitted alongside the Local Plan Partial Update and Proposals Map, and this Paper should be read in conjunction with those documents. Cross-references to the documents on that list are made throughout. The purpose of this paper is to both provide an overview of how procedural steps have been complied with, key facts and figures about Reading, and broadly set out how the evidence has led to the policies that are contained within the Local Plan Partial Update.

Structure of the Paper

- 1.6 This paper is divided into three sections. Section 2 sets out some of the key basic information that has influenced the Local Plan Partial Update and presents some overall facts and figures. Section 3 contains the procedural background, which seeks to demonstrate that the Council's procedures have complied with a raft of regulations and guidance. Section 4 summarises the background to each policy in the Local Plan Partial Update (including a discussion of policy options and thresholds, where applicable) and includes reference to more detailed documents where appropriate.

2. Key Facts about Reading

2.1 General

- 2.1.1 Reading is a primarily urban authority situated within the South East region and the former county of Berkshire. It is within the economically buoyant M4 corridor, situated adjacent to the M4 motorway itself. It is also on the Great Western main rail line, Crossrail (The Elizabeth Line) and has good connections to Heathrow airport. It borders three other local authorities: Wokingham Borough Council, West Berkshire Council and South Oxfordshire District Council, as well as Oxfordshire County Council. The urban area centred on Reading extends beyond the Borough's boundaries into West Berkshire and Wokingham.
- 2.1.2 These sections provide a brief overview of some of the key facts around Reading which have informed the development of the Local Plan. It is not comprehensive. More detail is available in the relevant background evidence and aims to justify how specific issues are dealt with.

2.2 Living in Reading

- 2.2.1 The population of the Borough at the 2021 Census was 174,224, an increase of approximately 12% since 2011. As stated above, the urban area centred on Reading extends significantly beyond the Borough boundaries. There are various ways to define the extent of the urban area, which under some definitions could encompass the towns of Wokingham and Bracknell, but the previous Berkshire defined this as "the contiguous built-up area centred on Reading' and including settlements contiguous with Reading located north of the M4 motorway. Although this document is superseded, this definition is still accurate. The population of this area in the 2021 Census was estimated to be around 233,000. However, this is not exact, because it relies on ward boundaries which do not necessarily equate exactly to the above definition.
- 2.2.2 Table 2.1 sets out the key demographic characteristics of the Borough from the 2021 Census and compares each figure to the South East and England figures. Although this information is now four years old, the key messages remain the same. Compared to the South East and England, Reading is characterised by:
- An extremely high population density, consistent with its primarily urban nature;
 - A high proportion of black and ethnic minority inhabitants;
 - An average percentage of single-person households, although with slightly higher household sizes overall;
 - A high proportion of households living in flats;
 - Relatively low levels of owner occupation compared to the South East;
 - A high proportion of residents who travel to work by more sustainable modes;
 - A high proportion of well-qualified inhabitants, but with a significant proportion of the population who have no qualifications; and

- Relatively high proportion of households without car access compared to the South East.

Table 2.1: Key Demographic Characteristics of Reading at 2021 (Source: Census 2021)

	Reading	South East	England
Population	174,200	9,278,065	56,489,800
Population Density (people per sq km)	4,312.6	486.5	433.5
People who are over 65 (%)	12.1%	19.4%	18.3%
Average household size	2.57	2.43	2.41
Single person households (%)	28.5%	28.4%	30.1%
Owner occupied households (%)	51.7%	67.1%	62.3%
Households which live in flats of maisonettes (%)	26.9%	17.1%	16.8%
Working age population who are economically active (%)	67%	62.2%	60.9%
People who usually travel to work by foot or bicycle (%)	14.1%	9.7%	9.5%
People who usually travel to work by public transport (%)	10.3%	4.9%	8.2%
People who usually travel to work by car or van (%)	31.4%	44.5%	44.2%
Households without a car or van (%)	28.4%	16.9%	23.5%
People with no qualifications (%)	15.8%	15.4%	18.1%
People with level 4 or 5 qualifications (%)	40.4%	35.8%	33.9%
People with a limiting long-term health problem or disability (%)	6.2%	7.5%	6.2%

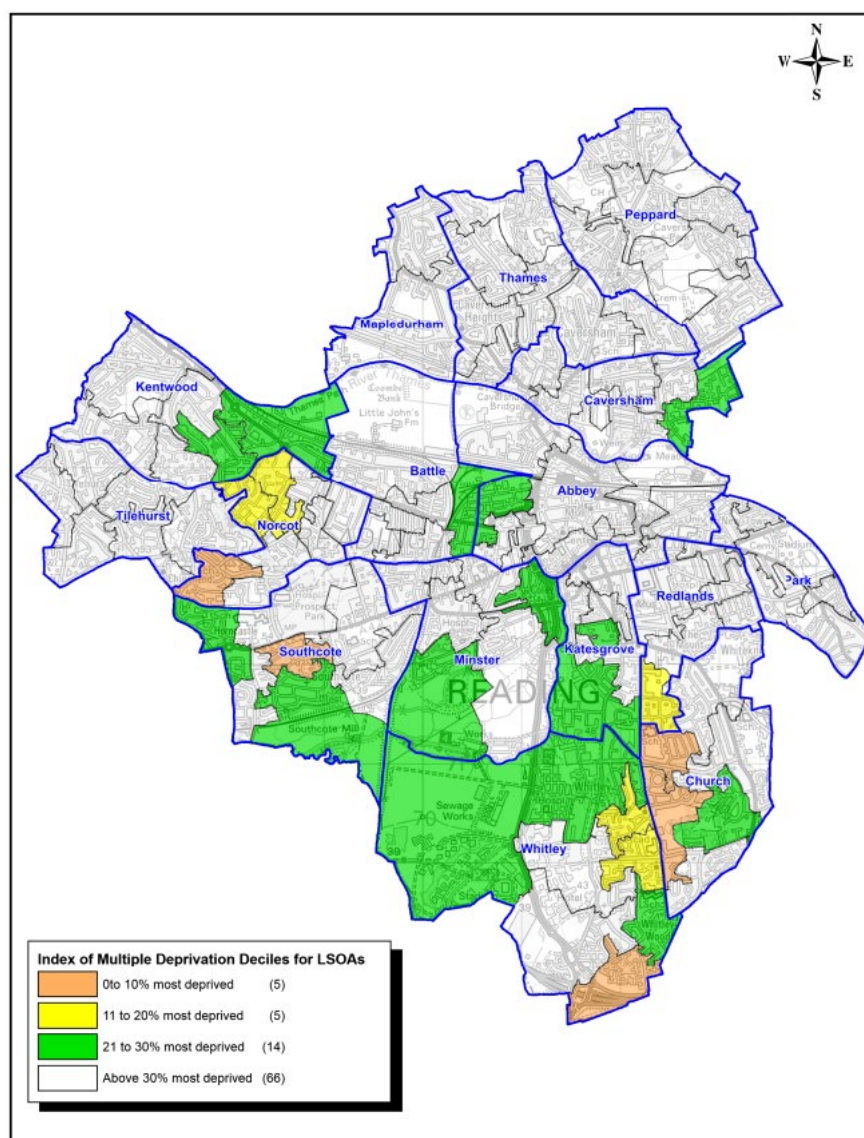
2.2.3 Compared to average for Great Britain, earnings of Reading residents are generally high. Residents in full-time work in 2023 had an average gross weekly pay of £855.10, compared to £869.10 for the South East and £811.10 for Great Britain¹.

2.2.4 As of December 2023, 3.5% of the economically active population in Reading were unemployed. This was slightly higher than the South East average (2.9%) and slightly lower than the UK average (3.7%).

¹ [Earnings and hours worked, place of residence by local authority: ASHE Table 8 - Office for National Statistics](#)

- 2.2.5 Unemployment across Great Britain rose slightly in the year proceeding December 2023 but fell slightly across the South East during the same period. Unemployment levels in Reading rose slightly during 2023 from 3.3% at the end of 2022².
- 2.2.6 Despite the relatively high wages and low unemployment by national standards, in 2019 Reading Borough contained some of the most deprived areas of the South East, including five Super Output Areas (SOUs) within the Borough that are in the 10% most deprived nationally. The majority of these areas are in South Reading, with some located in West Reading.

Table 2.2: Rank of Index of Multiple Deprivation (2019)



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Department for Communities and Local Government, Indices of Deprivation 2020

- 2.2.7 The indices of deprivation can also be broken down into their various components. Education, skills and training are a particular issue.

² [Reading's employment, unemployment and economic inactivity - ONS](#)

- 2.2.8 Three Lower Layer Super Output Areas (LSOAs) (Dee Road, Coronation Square and parts of Church Ward) fall within the 10% most deprived wards in terms of income. One LSOA (Swallowfield Drive) is in the 10% most deprived for employment, and one Reading LSOA falls within the top 10% most deprived in terms of health and disability (Dee Road). Eight LSOAs are within the top 10% most deprived in terms of access to Housing and Services. These LSOAs are located across the Borough.
- 2.2.9 Crime is one of the most significant issues for Reading, with five LSOAs within the top 10% most deprived in England and Wales, concentrated in West and South Reading.
- 2.2.10 House prices in Reading are well above the national average. In October 2024, the Reading average house price was £332,000, compared to an average of £295,000 for Great Britain. However, house prices are still lower than the South East average, which was £382,000 in October 2024.

Table 2.3: Annual changes in house prices in Reading Borough

Annual change in house prices in Reading

House price annual inflation, Reading, January 2005 to December 2024



Source: UK House Price Index from Office for National Statistics and HM Land Registry

- 2.2.11 Table 2.3 shows house price changes in Reading. Between December 2023 and December 2024, a 3.8% increase was shown. This is a lower increase than the South East (4.3%) and Great Britain overall, where prices rose 4.6% over the same period. High house prices within Reading Borough make it increasingly difficult for low wage earners to find accommodation they can afford, including key workers, whose labour is essential to the local economy.
- 2.2.12 Following the recovery of falling house prices as a result of the 2009 recession, prices have increased at a substantial rate, in particular for larger detached homes. In contrast, flats saw the weakest price rise, particularly after the Covid-19 pandemic³. This trend has a significant impact on Reading, which has limited land available for development and sees most of its residential development in the form of high density housing.

³ [Halifax UK | House Price Index | Media Centre](#)

- 2.2.13 Reading house prices remain slightly lower than for the South East as a whole. Affordable housing is a key issue. The Local Housing Needs Assessment (HNA) (EV011, July 2024) identifies an overall affordable housing need of 7,301 households over the plan period, equating to 405 per annum. This comprises a significant proportion of the total number of homes proposed to be delivered (825 per annum) and indicates a continuing overwhelming local need for affordable housing.

2.3 Working in Reading

- 2.3.1 Thames Valley remains one of the most economically buoyant areas in the UK and is often recognised as an area that is a key driver of the national economy. Gross Value Added (GVA) measures the contribution to the economy and is a key component in the calculation of gross domestic product (GDP). Gross Value Added per head within Reading was estimated to be £46,607 in 2019⁴, rising year-on-year over the last decade. In 2020, GVA was estimated to be £43,387 likely due to the impacts of the Covid-19 Pandemic.
- 2.3.2 The area has been very successful in attracting key investment in sectors such as computing, research and development, business and financial services, telecommunications, pharmaceuticals, logistics and the automotive industry. Reading itself has seen a dramatic change in the structure of its economy over the last 35 years from its 'bulb, biscuits and beer' focus to that of a compact and highly productive service economy specialising in business services. It serves as the service and financial centre of the Thames Valley and has a large number of business parks and industrial areas, as well as several others just outside its boundary in adjoining districts.
- 2.3.3 In terms of employment, the sectors which are particularly strongly represented include information and communication (17.2% in 2022 compared with 5% across England), professional, scientific and technical activities (15.5%), wholesale and retail trade including repair of motor vehicles and motorcycles (12%). The fastest growing sector within Reading is transportation and storage⁵.
- 2.3.4 At 2023, there were approximately 121,700 employee jobs based in Reading, according to the ONS Business Register and Employment Survey, compared to an economically active population of 102,400. Much of this importing of labour comes from surrounding areas that make up the greater urban area of Reading but are outside of the Borough boundaries. This has resulted in increasing commuting distances, car use and pressure on the housing market. The vast majority of workers have particularly short commutes (less than 5km), and the proportion of very long commutes (over 40km) has reduced since the Covid-19 pandemic and the increasing opportunity for homeworking.
- 2.3.5 At the time of the last census in 2021, commuter data was heavily influenced by the Covid-19 pandemic, during which many workers did not commute due to national lockdowns or furlough measures. At this time, 39.3% of individuals within Reading

⁴ <https://www.thamesvalleyberkshire.co.uk/getfile/Business%20in%20Berkshire%2021-22.pdf>

⁵ [Reading Economy | Labour Market & Industries](#)

surveyed as part of the census reported working mainly from home. Therefore, it is difficult to accurately determine commuting relationships with neighbouring areas to the same extent as the 2011 Census. In 2011, the largest commuting flows into Reading were from West Berkshire and Wokingham and this is likely to still be the case, as the urban area of Reading extends into these authorities. There is also a strong flow of commuters into London and a smaller flow of in-commuting from London. The balance of in- and out- commuting with South Oxfordshire was largely even in 2011.

- 2.3.6 Economic growth in Reading is expected to remain strong. A report by PWC⁶ which looks at the economic growth prospects of cities across the country listed Reading within the Top 10 cities by annual GVA growth rate and highlighted its “strong social, environmental and economic performance that can act as a prelude to strong economic growth in the future.”

2.4 Environment in Reading

- 2.4.1 Although much of Reading Borough is urbanised in nature, Reading retains a rich variety of natural landscapes and habitats, such as major water meadows and areas of ridged woodland and grassland. Reading is situated on the edge of the Chilterns and at the confluence of the River Thames and River Kennet. This has a prominent visual impact on the town.
- 2.4.2 Reading’s waterways create corridors throughout the town centre and offer opportunities for biodiversity and recreation within the urban environment. The River Thames lies to the north of the centre and is separated from the town by the railway line. Much of the Thames is accessible to the public and there are eight parks within the Borough along the riverside. The River Kennet runs through the town centre itself, and its riverside is largely developed. The Holy Brook also runs through the town centre but much of it is built over, however, glimpses of the Holy Brook can still be seen to the rear of Castle Street, Gun Street and Abbey Square. The Foundry Brook lies to the south of the town centre along the A33 relief road alongside Kennet Island.
- 2.4.3 In addition to its waterways, Reading contains a number of green areas which provide opportunities for informal recreation and wildlife. Whilst the Borough has no wildlife sites of national or regional significance, it does have many sites that are important locally and within Berkshire, including several Local Nature Reserves and Local Wildlife Sites. Trees and hedges are also an important part of the townscape, which has some substantial tree belt and ancient woodlands and hedgerows, some dating back to the 17th century.
- 2.4.4 However, these features continue to experience pressure from development both directly and indirectly, through pressure for development of land within urban areas in line with Government policy to protect the wider countryside, and to focus development on previously developed land. Existing habitats, which have evolved on remnants of land that have not been developed are increasingly fragmented. Despite

⁶ [Good Growth for Cities: Delivering Devolution - PwC UK](#)

this, there is a reasonable diversity of wildlife in Reading. However, many are in very small populations and are scattered across Reading.

- 2.4.5 Much of the undeveloped land within the Borough is heavily constrained, primarily due to the likelihood of flooding. The larger open spaces within the Borough are generally within Flood Zone 3 (as defined by the Strategic Flood Risk Assessment, EV027), defined as being at high risk of flooding. Many of the other larger areas are covered by biodiversity designations or are recognised as historic parks and gardens.
- 2.4.6 Reading's built environment reflects its distinct social, political and economic history and contains examples of buildings from medieval Abbey ruins to the present day. It is well known for its Victorian buildings and associated brick and tile-making industries. The local building style is characterised by patterned red, grey and cream brickwork with red tiles and distinctive terracotta features. Most recent developments, particularly those built within the 1960s and 70s are not as attractive and contribute less to the character of the town centre. Development from this era is reflective of the growth of car use.
- 2.4.7 There are over 800 listed buildings in Reading, two scheduled ancient monuments, five historic parks and gardens and fifteen Conservation Areas. These vary in character from Victorian suburbs at The Mount to village centres at Horncastle and St Peter's, and formal Georgian/Regency townscape at Eldon Square.

2.5 Development in Reading

- 2.5.1 A great deal of development has taken place over the recent years in Reading. Table 2.4 sets out the development that has taken place for residential, commercial, industrial and storage and distribution for each use class in the 5-year period from 2019 to 2024 in square meters, or in number of dwellings for housing.

Table 2.4: Completed development 2019-24 (sq m unless specified)

Use	2019-20	2020-21	2021-22	2022-23	2023-24	Total 2019-24
Commercial (E)	-15,170 ⁷	-8,560	24,316	-7,115	-1,159	-7,688
General industrial (B2)	0	-4,025	-1,087	-586	-3,294	-8,992
Storage and distribution (B8)	-699	-10,237	586	-3,213	-859	-14,422
Residential (C3) (dwellings)	521	408	850	888	1,021	3,688

- 2.5.2 Over the last five years, completions involving commercial (class E), general industrial (class B2) and storage and distribution (B8) have all shown a net loss. The pattern for B2 and, to a lesser extent, B8 uses has been a year on year loss, whilst commercial uses involve a net loss overall but can in individual years have a significant increase (usually where there is delivery of a substantial new office, as

⁷ This was prior to the new E use class being introduced. This figure is an approximate equivalent comprised of the totals of former use classes A1, A2, A3, B1 and D2.

there was in 2021-22 at Green Park). This net loss is in part due to conversions to residential under permitted development rights.

- 2.5.3 Over the five year period, an average of 738 homes per year have been completed. This can vary quite substantially from year to year, mostly because Reading is quite dependent on the delivery of large flatted blocks which are generally completed in one go rather than a steady flow of new houses. The most recent year saw the highest level of residential completions in around two decades.
- 2.5.4 Monitoring of development progress for 2024-25 has not yet been carried out, but the results are expected to be published in summer 2025 and be available to support the examination.
- 2.5.5 Some of the more significant developments and ongoing schemes in the Borough over this period have included:
- Green Park Station – newly opened railway station on the Reading to Basingstoke line.
 - Kennet Island – large residential development of over 1,000 homes now completed since the last Local Plan submission.
 - Station Hill – a major mixed-use redevelopment of the area around the Reading train station where first occupation has now taken place, including a number of affordable Build to Rent units.
 - Broad Street Mall – major residential development of towers on top of the existing shopping mall was recently granted planning permission.
 - Vastern Court – major mixed use redevelopment adjacent to the station that could include up to 1,000 homes granted in outline by the Secretary of State following an appeal.
 - 55 Vastern Road – major residential development allowed at appeal and now under construction.
 - Kenavon Drive – major redevelopment for 767 dwellings recently completed.
 - Reading Golf Club, Kidmore End Road – major residential development of 223 dwellings currently under construction.

2.6 Getting Around in Reading

- 2.6.1 Reading is in a unique location situated along the M4 corridor with excellent infrastructure links and in close proximity to major transport nodes, allowing easy access to national and international destinations. Both Heathrow Airport and London are within a 40-minute drive. Nearly 20 million passengers arrive or depart at Reading Station per year, and it is the second busiest interchange station outside of London, second only to Birmingham New Street, with nearly four million passengers a year changing trains at Reading Station. In the last year, Reading Buses have completed more than 19.5 million customer journeys and has the third highest number of bus passengers per head in England outside of London. Reading's prominence as a commercial location and major transport hub places considerable pressure on its transport infrastructure. Public transport is well-used, but high levels

of private car use contribute significantly to congestion and pollution, especially at peak times.

- 2.6.2 Major brownfield development to the north and south of the station continues, creating new high-quality mixed-use extensions to the centre. This represents a significant boost to Reading's economy, townscape and public realm, and will create more housing and jobs in accessible locations.
- 2.6.3 Other major transport schemes which are underway or being developed include a series of new Bus Rapid Transit routes and Mobility Hubs, such as improvements throughout South Reading to connect to Mere Oak Park and Ride, and a new National Cycle Network route connecting Newbury to Ascot via Reading and Wokingham. All these schemes are vital to the continued growth and economic success of Reading and the wider Thames Valley.

2.7 Key Messages

- 2.7.1 In summary, there are a number of key messages as follows:
 - The constrained boundary of the Borough means that much of the area is likely to see continued development on previously developed land, with very little opportunity to develop greenfield land;
 - Despite the relative affluence of the Borough, there are significant pockets of deprivation, particularly in South Reading and parts of West Reading;
 - Reading is the main settlement providing IT and professional services within the area, one of the main drivers of the national economy;
 - There is good reason to believe that Reading will continue to be one of the most economically successful areas with significant levels of development;
 - There is a strong need for additional housing, particularly affordable housing;
 - Low levels of car ownership mean that access to services in smaller centres accessible by public transport or active travel is crucial; and
 - There is a very high level of public transport use, particularly to and from the centre, and significant proposed improvements which could make areas accessible for future development.

3. Procedural Background

3.1 Introduction

- 3.1.1 There are a number of requirements in producing a Local Plan as outlined in the (NPPF), including tests of soundness, legal requirements and the Duty to Co-operate. Most of these are an integral part of producing a planning document in any case, but in some cases, Local Planning Authorities are obliged to demonstrate how these requirements have been met. This section therefore outlines some of the key elements of the procedures involved with the production of the Local Plan Partial Update.
- 3.1.2 Broadly, this section deals with three main aspects. Firstly, it looks at key issues in how the Local Plan Partial Update and Proposals Map have been prepared, including the Local Development Scheme (PP001), Statement of Community Involvement (PP002, PP003) and the Sustainability Appraisal (LP005). Secondly, it examines the internal consistency of the documents and their conformity with other layers of planning policy and strategies. Finally, it highlights existing policies which will be replaced by the Local Plan Partial Update.
- 3.1.3 The Council has also completed the Soundness Self-Assessment Toolkit and the Legal Compliance Checklist (EV003) provided by the Planning Advisory Service. A Duty to Co-operate Statement (EV001) has also been prepared. These documents help to demonstrate compliance with procedural requirements, and this section should be read alongside those documents.
- 3.1.4 This section treats the Local Plan Partial Update and the Proposals Map as essentially the same document, as the map is merely the spatial representation of policies in the plan (along with baseline information and existing adopted policies). Therefore, they are examined together.

3.2 How the Local Plan Partial Update has been developed

- 3.2.1 The broad timetable for how the Local Plan Partial Update and Proposal Map have been developed is set out in section 3.3 in relation to the Local Development Scheme. The decision to produce a Local Plan Partial Update was taken in March 2023.
- 3.2.2 The production of the documents has followed the process set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Overall Process

- 3.2.3 The broad timetable for the Local Plan Partial Update and Proposals Map have been developed is set out in Section 3.3 in relation to the Local Development Scheme.
- 3.2.4 The Reading Borough Local Plan was adopted on 4th November 2019 and sets out the planning policies and proposals for Reading up to 2036.
- 3.2.5 The need for a partial update of the existing Local Plan in Reading arises from the legal requirement for Local Authorities to review local plans within five years of

adoption, as set out in Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

- 3.2.6 A Local Plan Review (LP011) was carried out and was published in March 2023. This identified the need to update 45 of the 90 policies of the Local Plan. As such, the Partial Update covers those identified policies and their associated parts (such as the spatial strategy and infrastructure delivery plan) rather than the plan in its entirety.
- 3.2.7 The first formal stage was to undertake a call for sites, which took place in April – May 2023. This resulted in 17 sites in Reading in addition to those already identified.
- 3.2.8 The first stage of consultation was on the Consultation on Scope and Content (LP008) (under Regulation 18) from November 2023 to January 2024. This document consulted on proposed changes to each policy within the scope of the partial update. It described the proposed approach for each policy, but did not contain draft language. It also consulted on new sites nominated for inclusion as a result of the call for sites. A summary of the consultation and representations received is set out in the Statement of Consultation on Scope and Content (LP010).
- 3.2.9 The final consultation stage was on the Pre-Submission Draft Partial Update (under Regulation 19) (LP003), which took place from November 2024 to December 2024. Much of this content reflected the proposals in the Regulation 18 document, however, there were two additional policies, specifically CC10: Health Impact Assessment and EN19: Urban Greening Factor. In addition, there were a number of changes to existing policies and more defined site allocations. A summary of the consultation and representations received is set out in the Statement of Consultation on the Pre-Submission Draft Partial Update (LP006).
- 3.2.10 After the close of the consultation under Regulation 19, the need for any changes was considered. It was decided that only minor wording changes, corrections and clarifications were required, which meant that the plan could proceed directly to submission under Regulation 22. A Schedule of Minor Changes before submission (LP002) is included within the evidence base. The Local Plan Partial Update and Proposals Map were submitted on 9th May 2025.

Proposals Map

- 3.2.11 The Proposals Map presents designations from the Local Plan Partial Update. Alongside this, important contextual information is also presented. Versions of the Proposals Map were subject to consultation alongside the Pre-Submission Draft Partial Update (LP004), and this version is unchanged and therefore submitted as final. It would replace the adopted Proposals Map from November 2019 (PP006).
- 3.2.12 In terms of content, Regulation 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) specify that a policies map must:
 - a) be reproduced from, or be based on, an Ordnance Survey map;
 - b) include an explanation of any symbol or notation which it uses; and
 - c) illustrate geographically the application of the policies in the adopted development plan.

3.2.13 Any policies with a spatial definition are shown on the Proposals Map, in line with the Regulations, but there are also other contextual matters that are also shown:

- **Areas of protection, such as nationally protected landscapes and internationally, nationally and locally-designated areas and sites;** because Reading Borough is primarily urban in nature, there are few nationally or internationally designated areas to show. However, scheduled ancient monuments and historic parks and gardens are national designations, and are therefore shown. In addition, Local Wildlife Sites and Local Nature Reserves are designated locally and recognised by Natural England, so are shown (as part of the Green Network);
- **Areas at risk from flooding;** This has been a difficult designation to show on the Map. Flood areas cover huge swaths of land and often coincide with other designations. It is very difficult to show it without it being a solid fill, and this would dominate the whole map. Therefore, only the boundary of the area at risk of fluvial flooding (i.e. Flood Zone 2) is displayed on the main Proposals Map. More detail is available in the Strategic Flood Risk Assessment (EV027, EV028).
- **Minerals and waste matters;** The Central and Eastern Berkshire Joint Minerals and Waste Plan (OP005) was adopted in January 2023.
- **The geographical area covered by any inset maps;** there are 19 inset maps on the Proposals Map, which are the designated centres.

3.2.14 In addition to this, it is necessary to show other information to successfully apply the policies within the Local Plan. For instance, there is much reference to the Air Quality Management Area, and it is therefore essential that this information is shown.

Translating Needs into Development Provision

3.2.15 The main development needs were set out in the HNA (EV011), published in July 2024, and Commercial Development Needs Assessment (CDNA), (EV006-EV009) published in February 2025.

3.2.16 The main tool for translating these needs into a figure to be provided for within the Local Plan is the Housing and Economic Land Availability Assessment (HELAA) (EV015 and EV016). The HELAA operated in tandem with the Sequential and Exceptions Test (EV026). These tests are integrated with the HELAA methodology but are presented separately to demonstrate compliance with national policy.

3.2.17 The full description of the HELAA methodology and process is set out in the HELAA report itself, together with the full set of tables for all sites. As well as providing the main evidence base for the overall capacity of the Borough, it also provides the main evidence base for individual sites. Where a site in the HELAA was identified as contributing towards meeting the identified development needs and did not already have a planning permission, or a resolution to grant permission, for that use, it was generally brought into the Local Plan as a development allocation.

3.2.18 The HELAA did not identify sufficient land to fully meet the needs for industrial and warehouse. However, in part, this is because the HELAA process, whilst it had examined the potential for housing intensification, had not focused on intensification of employment areas for industrial and warehousing, nor had it allowed for the

flexibility of the town centre retail sites to accommodate additional retail should the market support this. The Employment Area Analysis (EV010) demonstrates that there is scope within the Core Employment Areas for intensification of industrial and warehousing to make up the shortfall.

- 3.2.19 There is no unmet need arising from the HELAA because the Local Plan Partial Update bases its level of housing need on the findings of the HNA, which can be fully met within Reading's boundaries. It was nonetheless considered necessary to make a request to neighbouring authorities under the duty to co-operate to understand the position if the Partial Update were to be based on the outcome of the standard methodology. The standard methodology at the time (2024) produced a level of need of 878 homes per year for Reading, whilst the assessed capacity at the time was 825 homes per year, which would mean that there would be an unmet need of 954 homes over the plan period to 2041. This is covered in detail in the Duty to Co-operate Statement (EV001).

3.3 Compliance with the Local Development Scheme

- 3.3.1 Section 19 (1) of the Planning and Compulsory Purchase Act 2004 states that Local Development Documents must be prepared in accordance with the local development scheme (LDS). This section demonstrates that this requirement has been fulfilled for the Local Plan Partial Update and Proposals Map.
- 3.3.2 The LDS sets out the intentions for the role and scope of the Local Plan, key milestones and then resources required to prepare it. The last version of the Local Development Scheme (LDS) was published in June 2024 (PP001).

Milestones

- 3.3.3 The milestones in the LDS for the production of the Local Plan Partial Update and accompanying proposals map have been amended in the LDS each year. Table 3.1 below shows the milestone dates.

Table 3.1: Progress against milestones in the LDS

	LDS June 2024	Actual
Scope and Content	Nov 2023 – Jan 2024	Nov 2023 – Jan 2024
Pre-submission	Nov 2024 – Jan 2025	Nov – Dec 2024
Submission	End of Feb 2025	May 2025
Adoption	Sept/Oct 2025	-

- 3.3.4 Dates have broadly accorded with the milestones set out in the most up-to-date LDS, with the exception of delay in the submission of the final draft of the Local Plan Partial Update. This was due mainly to personal circumstances within the team.

Scope

- 3.3.5 In the July 2013 LDS, the Council set out the scope of the 2019 Local Plan. It defined the geographic coverage as being the whole Borough, and set out the broad coverage as being:

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

- 3.3.6 A review of the Local Plan was undertaken and reported in March 2023 (LP011) and this determined that an update of certain policies was required in light of new national policy and legislation, changes in circumstances and monitoring the effectiveness of policies. It was determined that a full update was not required, however, 45 of the 90 policies were identified as requiring an update.

Conclusion

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

3.4 Compliance with the Statement of Community Involvement

- 3.4.1 Section 19(3) of the Planning and Compulsory Purchase Act 2004 states that, in preparing a Local Development Document, a local authority should comply with their Statement of Community Involvement (SCI). This section fulfils the need for a statement of compliance, detailing how the local planning authority has complied with the SCI.
- 3.4.2 The current adopted version of the SCI dates from 2014. A review was carried out in 2019 which concluded that the SCI required an update due to its approach to neighbourhood planning being out of date. A consultation on an update was undertaken, but an updated version was not progressed to adoption due to there being, at the time, a proposal for a wider review of consultation approaches across the Council. This wider review did not occur in the end, but the updated SCI was not progressed.
- 3.4.3 A further review was carried out and reported to full Council in October 2024 alongside the Regulation 19 Local Plan Partial Update consultation document. This came to the same conclusions as the previous review, which is that the SCI is out of date only in terms of neighbourhood planning. Council agreed to progress an update, but also importantly agreed that the SCI remains up to date for the purposes of consultation on the Local Plan Partial Update.

- 3.4.4 A consultation version of the SCI (PP003) was published in January 2025. Three responses were received to the consultation. None of these were substantive or required significant changes to the SCI. The new version of the SCI is due to be adopted at the Council's Policy Committee on 8th June 2025.
- 3.4.5 Both the existing and the proposed new SCI are based around seven key principles. Figure 3.2 below illustrates how the Council has complied with these principles.

Table 3.2: Compliance with SCI principles

SCI guidance	Compliance with guidance
Accessibility and Choice	
<p>The Council will maintain a list of individuals, groups and organisations that have expressed an interest in being involved in consultations on planning matters and will consult them on all relevant planning matters.</p> <p>Measures to involve and consult the community will be appropriate to the type, scope and stage of the policy or plan, and to the community itself.</p> <p>The Council will clearly state the methods for responding, and the timescales, at the beginning of the process. This will be on the website, as well as any consultation material, letters and e-mails produced.</p> <p>The Council is emphasising the importance of working at a neighbourhood level. In consulting on planning documents, the Council will use existing neighbourhood networks and structures to consult and involve, where those networks and structures are representative of the neighbourhood, and this may mean a differing approach in different neighbourhoods.</p> <p>The materials, documents and methods of community involvement will be designed to maximise accessibility insofar as is possible.</p>	<p>A list has been maintained, and consultation on all stages of the Local Plan Partial Update was sent to the entire list.</p> <p>Measures were appropriate to the stage of the plan, with the widest community involvement being held at the earliest stages as set out in the SCI.</p> <p>The methods and timescales for responding were clearly placed on the website and on consultation material at each stage.</p> <p>The Council has tapped into existing neighbourhood networks to assist in engaging on stages of the Local Plan, for instance, groups such as Tilehurst GLOBE and the groups that make up the Conservation Area Advisory Committee.</p> <p>Materials and documents were designed to balance ease of understanding with the need to communicate some quite complex issues. Consultation events were held in different locations at different times and days of the week to broaden accessibility.</p>
Timeliness	
<p>Community involvement on policies and proposals will be front-loaded. This means that the most wide-ranging and open involvement will take place at the earliest stage, when the opportunity to shape the outcome is greatest. As policies and proposals develop further, consultations should become more focussed and seek views on more detailed matters.</p>	<p>The widest community involvement took place at Scope and Content stage, where the opportunity to shape the outcome was greatest. This included an online webinar, questionnaire, drop-in events etc. The focus of consultation events narrowed at later stages.</p> <p>All consultation stages were at least six weeks.</p>

SCI guidance	Compliance with guidance
<p>Any community involvement stage for a planning policy document will last for a minimum of six weeks.</p> <p>The Council will avoid consulting over Christmas and New Year insofar as is possible. Where consultations over these periods are inevitable, consultation periods will be extended to take account of this. Where consultation is necessary in other holiday periods, consideration will also be given to extending deadlines.</p> <p>Events designed to publicise the community involvement (e.g. public exhibitions) will be held at a time within the community involvement period which allows time for responses afterwards, e.g. not within the last ten days before the period closes.</p>	<p>The Consultation on Scope and Content took place over Christmas and was therefore extended to a period of just over 9 weeks.</p> <p>Public exhibitions were generally held early in the process.</p>
Inclusiveness and Equity	
<p>All groups will have equal opportunities to get involved in the process, and this will include the selection of venues and timing of events.</p> <p>Whilst enabling all groups to be involved in the process, the Council will make particular efforts to reach groups that have typically been difficult to involve in past planning policy consultation exercises in Reading. These include: Younger people (under 40); Black and minority ethnic populations; and residents of less affluent communities, including much of South Reading and parts of West and Central Reading</p>	<p>Events were timetabled to try to maximise access for all, and venues were generally accessible.</p> <p>There has continued to be a difficulty in reaching the communities identified in the SCI. Although the age and ethnicity of respondents has not been recorded, the location of residents has tended to reflect past consultations, with greater numbers of responses from the west and north. The job has been made more difficult with the removal or weakening of some of the bodies that had previously been used, e.g. Council forums and the Sakoma group, representing ethnic minority groups. However, the Local Plan Partial Update process stages were each accompanied by an online communications strategy which attempted to reach people online.</p>
Transparency and Honesty	
<p>Where background evidence is vital to an understanding of the decisions to be made, this will be made available on the Council's website and on request and will be highlighted within the consultation documents themselves.</p>	<p>The Council has sought to publish the main pieces of background evidence wherever available during consultation processes. This has not been achieved across the board as resource constraints have made it difficult to progress a significant number of documents at the same time, but those documents that affect</p>

SCI guidance	Compliance with guidance
<p>The Council will highlight any significant constraints that prevent the pursuit of certain options and will not consult on options that are not realistic or achievable.</p>	<p>key matters such as the scale and distribution of development have been published earlier in the process.</p> <p>The publication documents have highlighted constraints on these matters where they exist. For instance, spatial options around housing numbers sought to make clear the implications of certain development levels for e.g. employment areas and undeveloped land.</p>
Respect and Listening	
<p>All responses received in writing within the specified consultation period will be taken into account.</p> <p>When publishing consultation results, the Council will publish only the name of the respondent and no other personal details.</p>	<p>The Council has taken all responses received during the consultation period into account, and the Statements of Consultation set out how each point has been considered.</p> <p>Only names have been published when reporting responses, and no other personal details.</p>
Accountability	
<p>In reporting on the community involvement, the Council will respond to each individual point made, stating what action, if any, the Council will be taking to address the point. Where the number of responses is reasonably low, for example under 50, this may be done individually for each respondent.</p> <p>However, where a significant number of responses have been received, where the same point has been made by a number of different respondents, these may be grouped together with a single Council response.</p> <p>A report of consultation will be published which summarises the consultation undertaken, and summarises the representations received and the Council response to those representations. This will be published at the next stage of the document at the latest and will be available on the website and in hard copy in Reading Borough libraries and the Civic Offices.</p> <p>The Council will contact anyone who made representations on planning policy to notify them of the next stage of that policy production. In doing so, the Council will highlight the availability of the report of consultation.</p>	<p>The Council has taken all responses received during the consultation period into account, and the Statements of Consultation set out how each individual point has been considered.</p> <p>A Statement of Consultation has been published covering each consultation stage, summarising the methods and responses, and containing a schedule of the individual points made and the Council responses. These have been published at the latest at the time of the next consultation.</p> <p>All respondents have been added to the consultation list and have therefore been notified of the next consultation stage.</p>

SCI guidance	Compliance with guidance
Flexibility and Evolution	
<p>The Council will welcome any comments on the community involvement processes used, and will take account of them in future exercises, and will ask for feedback on specific events, e.g. workshops and exhibitions.</p> <p>Lessons learned from individual community involvement stages will be reported on within the Report of Consultation and will be taken into account in future exercises.</p>	<p>There have been some comments on the processes, and these have been taken into account where possible and reasonable.</p> <p>The Statements of Consultation include an evaluation section which picks up on lessons learned from the consultation exercises.</p>

- 3.4.6 Statements of Consultation have been published which describe in more depth the actions taken at each stage of consultation and demonstrate how the exercises have complied with the SCI (LP006, LP010).
- 3.4.7 Therefore, the Local Plan, together with the Proposals Map, comply with the Council's Statement of Community Involvement, and meet this legal requirement in the Planning and Compulsory Purchase Act 2004.

3.5 Sustainability Appraisal of the Local Plan Partial Update

- 3.5.1 It is a requirement under the Strategic Environmental Assessment Regulations 2004 for Strategic Environmental Assessment to be carried out for plans and policies. For local plans, this takes the form of Sustainability Appraisal, as detailed in Section 19(5) of the Planning and Compulsory Purchase Act 2004. This states that each Local Planning Authority should carry out an appraisal of the sustainability of the proposals in each document and prepare a report of the findings of the appraisal.
- 3.5.2 Each stage of the Local Plan Partial Update and the accompanying Proposals Map was accompanied by a Sustainability Appraisal report, which utilised the framework and sustainability objectives set out in the Sustainability Appraisal Scoping Report. The Scoping Report was published in September 2014 (PP004) in order to inform the development of the Local Plan. These reports were drawn up in a way that informed the production of each respective stage of the document. Therefore, the following reports have been published:
- Sustainability Appraisal of the Scope and Content Local Plan Partial Update (Reg 18), November 2023 (LP009); and
 - Sustainability Appraisal of the Local Plan Pre-Submission Draft Partial Update (Reg 19), November 2024 (LP005).
- 3.5.3 The Sustainability Appraisal Process has also incorporated the requirement to undertake two other more detailed, screening level assessments: Habitat Regulations Assessment and Equality Impact Assessment.
- 3.5.4 Where plans have a significant effect on a Special Area of Conservation (SAC) or Special Protection Area (SPA), plans are subject to a Habitat Regulations Assessment, in accordance with statutory requirements. The screening level

assessment was undertaken in appraising objective 8, and each report sets out more detail in appendices of how this has been considered.

- 3.5.5 The Equality Impact Assessment looks at how a policy or function will affect people from different groups, and in turn, whether it has a negative impact on groups or individuals with particular regard to race, gender, disability, sexual orientation, age or religious belief. The screening level assessment was undertaken in appraising objective 16, and each report sets out more detail in appendices of how this has been considered.
- 3.5.6 This section briefly summarised the scope of each Sustainability Appraisal and highlights the key results.

Sustainability Appraisal of the Scope and Content Local Plan Partial Update, November 2023 (LP009)

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

Sustainability Appraisal of the Local Plan Pre-Submission Draft Partial Update, November 2024 (LP005)

- 3.5.10 This document was a Sustainability Appraisal of the policies and sites set out in the Pre-Submission Draft Partial Update. It took each option for a policy or site, in turn, and examined it against the environmental, social and economic objectives.
- 3.5.11 As this was the first stage with draft policies in place, the appraisal covered a wider range of matters compared with the Sustainability Appraisal of the Scope and Content. It was therefore more extensive and in-depth, and provided an overall impression of the likely effects. The additional policies added to the Pre-Submission Draft were also assessed.
- 3.5.12 The proposed development management policies showed overwhelmingly positive sustainability effects, for instance making the best use of previously-developed land, improving the environment and providing much needed housing.
- 3.5.13 For all development options, there were some environmental costs, such as carbon dioxide emissions, energy use and waste generation. Mitigation of effects is a constant feature and can be partially achieved through compliance with other

policies. Certain potentially negative effects requiring mitigation regularly appeared. These include the following:

- Air quality issues: The Air Quality Management Area is extensive and covers the most accessible parts of the Borough. There will clearly be a need to consider measures to mitigate the effects on residents from the local air quality, and on the quality of the air from additional traffic;
- Other pollution effects: sites which may be subject to noise or have potential contamination will require mitigation measures;
- Education and healthcare infrastructure: certain areas of the Borough are under pressure in terms of education and healthcare capacity. This is an issue which has been considered in drawing up the Local Plan; and
- Flood risk: allocations must consider the extent to which new development in the floodplain puts potential residents at risk and affects flood risk elsewhere. Clearly, where effects cannot be mitigated, allocations on such sites should not be pursued.

3.5.14 During the consultation on the Pre-Submission Draft Partial update, there were four representations submitted which related to the Sustainability Appraisal. The Council's response to these comments is contained within the Statement of Consultation on the Pre-Submission Draft (LP006), and are also set out below:

1. Bracknell Forest Council: Potential impacts on designated sites appear to have been identified for several policies but the assessment is taken no further. It should show what policies (and sites) have been screened in for Appropriate Assessment (AA) and an AA should be undertaken for these policies and sites.

2. Gladman: RBC has limited its options assessment to meeting only its own needs. There has been no assessment of meeting the needs of adjoining authorities in the wider housing market area. Whilst the chosen housing number of 825 is based on 'capacity' rather than the standard method figure, tested options have been limited. As a general observation, we would also note that Options H1(i) and (iv) perform the same in the scoring matrix provided on page 75 of the Pre-Submission SA report, meaning that is unclear why the former has been chosen in preference to the latter in SA terms. Whilst the supporting commentary to the assessment reasons that H1(i) is the preferred choice, as this would be in line with the borough's capacity, avoids unnecessary over-development and provides housing for current and future generations, the results of the SA do not appear to support its selection in preference to all the stated alternatives.

3. Wokingham Borough Council: As noted under 'Spatial strategy and transport' above, given the limitations of the transport evidence, it is not possible to understand whether the impacts of the spatial strategy have been suitably assessed. Indeed, paragraph 3.4 of the sustainability appraisal acknowledges this issue. Even with additional evidence provided by Stantec

(Dec'24) it will be necessary to align other parts of the plan before the Plan is submitted for examination.

4. National Highways: Requesting a copy of the transport modelling assessment.

- 3.5.15 In appraising the proposed options, no significant adverse effects that would require a full Equality Impact Assessment were identified. A full Habitat Regulations Screening Assessment was produced (LP012) in response to comment by Bracknell Forest Council.

Habitat Regulations Assessment

- 3.5.16 Article 6 of the Habitats Directive 92/43/EEC deals with the management of Natura 2000 sites, which includes Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Where land use plans may have a significant effect on a Natura 2000 site, plans are subject to appropriate assessment, in accordance with statutory requirements. The Sustainability Appraisal process incorporates the screening level Habitat Regulations Assessment for the Local Plan Partial Update and Proposals Map. A full Habitat Regulations Screening Assessment was produced (LP012) for submission.
- 3.5.17 In all but a small number of cases no impacts are shown, which is unsurprising given the distance of Reading from designated sites and the relatively minor transport implications as highlighted in the Transport Modelling. Potential increases in road traffic were among the most likely impacts on designated sites through effects such as poorer air quality, noise, disturbance and vibration, but with traffic impacts outside Reading expected to be limited, this is also unlikely to result in significant impacts on designated wildlife sites.

Equality Impact Assessment

- 3.5.17 An Equality Impact Assessment stems from the Equality Act 2010. This looks at how a policy or function will affect people from different groups, and in turn, whether it has a negative impact on groups or individuals, with particular regard to race, gender, disability, sexual orientation, age or religious belief. The Sustainability Appraisal process incorporates the screening level Equality Impact Assessment for the Local Plan Partial Update and Proposals Map. In summary, no significant adverse impacts on protected characteristics were identified, and as such the full Equality Impact Assessment was not deemed necessary.

3.6 Soundness and Legal Compliance

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

Positively Prepared

- 3.6.2 According to the NPPF, the plan should “provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from the neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development” (paragraph 35).
- 3.6.3 In general, the headline objectively assessed developments needs between 2023 and 2041 can be summarised as:
- 13,230 additional homes (735 per annum)
 - 86,000 sq m of office floor space
 - 167,000 sq m of industrial, warehouse and research and development floorspace
 - No identified need for retail and built leisure facilities
- 3.6.4 The scope to accommodate this need has been assessed through the HELAA (EV015 and EV016), although in the case of accommodating additional need for industrial and warehouse space, this is supplemented through the Employment Area Analysis (EV010). The HELAA balances the capacity to accommodate needs with the degree to which doing so would achieve sustainable development, by considering issues highlighted in the NPPF such as heritage, biodiversity, character, flood risk and many more.
- 3.6.5 In the case of residential, office and industrial and warehouse needs, the Local Plan makes provision to meet the full objectively assessed needs.
- 3.6.6 The only instance where there is an identified need that the plan is not able to meet is the need for gypsy and traveller provision. Evidence supporting the adopted Local Plan identified a need for 10-17 permanent pitches for gypsies and travellers, a transit site of 5 pitches and 2 plots for travelling showpeople. The Local Plan seeks to meet the travelling showpeople need within the Borough, and a permission was granted that would meet the transit site need (albeit this is not expected to be delivered), but the need for permanent pitches remains unmet. This remains the case in the Partial Update, as there are no sites upon which this can be accommodated. The policy on gypsy and traveller provision is not proposed to be updated.
- 3.6.7 In terms of unmet needs from other authorities, since adoption of the Local Plan the Council (together with other local authorities) has received four requests to help meet unmet needs from elsewhere. These relate to housing need (from Elmbridge), employment uses (Bracknell Forest and West Berkshire) and gypsies and travellers (Wokingham). The situation with these requests is described in more detail in the Duty to Co-operate Statement (EV001), but broadly Reading does not have scope to meet any more than its own needs for employment, and continues to have its own unmet needs for gypsies and travellers, so is not in a position to accommodate any of these unmet needs. In terms of housing, Elmbridge is around 30 km from Reading, and a letter from the inspector in September 2024 indicates that the plan is currently unsound in part because it is undertaken on a brownfield only basis and does not consider the release of Green Belt land. As such, contributing to Elmbridge’s unmet need is not considered appropriate.

- 3.6.8 The Local Plan Partial Update is therefore considered to be positively prepared in that it seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified

- 3.6.9 To be justified, a plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- 3.6.10 The Local Plan Partial Update, together with the accompanying Proposals Map, has been founded on a robust and credible evidence base. This document forms part of the evidence base.
- 3.6.11 The Local Plan Partial Update contains the most appropriate strategies when considered against the reasonable alternatives. Section 4 of this background paper lists the reasonable alternatives for each policy, including a discussion of thresholds where applicable, and summarises why they were rejected. These reasonable alternatives have all been subject to the Sustainability Appraisal of the Pre-Submission Draft Partial Update (LP005).

Effective

- 3.6.12 The Local Plan Partial Update is effective. To be effective, a plan should be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 3.6.13 The Local Plan Partial Update is deliverable. Section 11 of the Local Plan Partial Update details how the plan can be delivered, including a summary of the Infrastructure Delivery Plan. A Local Plan Viability Testing Report (EV004) has been undertaken and confirms that the requirements do not present a burden to developers that will stifle deliverability. In addition, the HELAA looks at delivery of individual development sites, and these have led to realistic assumptions in the site specific and overall development figures.
- 3.6.14 The plan is based on effective joint working on cross-boundary strategic priorities. There has been particular joint working on accommodating development needs and planning for strategic infrastructure needs. The Duty to Co-operate Statement (EV001) looks at this joint working in much more detail and demonstrates how this requirement has been fulfilled, and this includes the Statements of Common Ground that have been prepared with neighbouring authorities.

Consistent with National Policy

- 3.6.15 The plan should enable the delivery of sustainable development in accordance with the requirements of the NPPF and other statements of national planning policy. Section 19(2)(a) of the Planning and Compulsory Purchase Act 2004 states that, in preparing a Local Development Document, the local planning authority must have regard to national policies and advice contained in guidance issued by the Secretary of State.

- 3.6.16 The Local Plan Partial Update, together with the Proposals Map, is consistent with national policy. The completed Soundness Self-Assessment Toolkit (EV003) goes through elements of the NPPF (including new requirements contained within the 2024 version) and other national policy documents and sets out how those individual elements have been complied with, and as such there is no need to list individual aspects of that guidance here. However, it is worth briefly considering the requirements for plan-making in Section 3.

Legally compliant

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

Duty to Co-operate

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

3.7 Internal Consistency

- 3.7.1 It is important that there is internal consistency within the Local Plan, if the policies and proposals are to be effectively delivered. In general, it is considered that policies are consistent with each other. However, the list below discussed any identified issues which require further scrutiny on whether there is genuine consistency.
1. CC2 (Sustainable Design and Construction) seeks improved sustainability performance of buildings. There is a potential tension with some of the heritage policies, notably EN1 (Protection and Enhancement of the Historic Environment), EN3 (Enhancement of Conservation Areas) and EN4 (Locally Important Heritage Assets), in that upgrades to environmental performance can come into conflict with the historic integrity of the building. Ultimately, this will be a balancing act that needs to be struck on a case-by-case basis, as the significance of each individual asset is different.
 2. CC3 (Adaptation to Climate Change) sets out requirements for all development to demonstrate adaptability to climate change, as flooding is expected to worsen. There are a number of sites allocated for development in Flood Zones 2 or 3, however, the allocated sites have passed a sequential test in line with the NPPF and are therefore considered appropriate in terms of national policy. This analysis was based on the Strategic Flood Risk Assessment (EV027), which took account of worsening conditions with climate change.
 3. CC9 (Securing Infrastructure) sets out increased priority for healthcare infrastructure, supported by the new policy CC10 (Health Impact Assessment), and the requirement to provide healthcare facilities has been

incorporated into some site allocations. This is likely to lead to land use conflicts in developments where less residential units may be provided if the requirement for healthcare facilities was not sought. However, this is necessary to support the growing population of Reading.

4. EN14 (Trees, Hedges and Woodland) is proposed to reference the impact of trees on historic buildings. This is an area where there may be existing conflict from tree roots damaging the foundations and overall structural integrity of historic properties, and therefore the proposed updated policy will support planners in resolving such conflicts.
5. The policies that propose significant levels of development, notably EM1 (Provision of Employment), H1 (Provision of Housing) and RL2 (Scale and Location of Retail, Leisure and Culture Development) may have impacts on amenity of existing residents, as safeguarded by CC8 (Safeguarding Amenity). However, this has been considered through the individual allocations, and new development will need to meet the CC8 requirements in any case.
6. CR10 (Tall Buildings) identifies a number of locations in the centre where tall buildings may be appropriate, and this will mean tall buildings in close proximity to heritage assets protected by EN1 (Protection and Enhancement of the Historic Environment). However, the effect on heritage assets of each location has been considered through the Tall Buildings Strategy Update (EV024) and has therefore been factored into the policy.
7. As for 7 above, the focusing of development on Central Reading means development is likely to take place in identified Areas of Archaeological Potential (EN2). Many allocated sites across the Borough have identified archaeological potential. This is an unavoidable aspect of development in an established urban area, but policy EN2 and the relevant site allocation policies highlight the issue.
8. A small number of sites would lead to the loss of some space that would be covered by EN8 (Undesignated Open Space). The acceptability of loss of this land, which is not generally in any case open to public use, has been considered in developing the site allocations, in particular through the HELAA process, and is considered to be justified.
9. A number of the development allocations would place residents in areas where there could be an increased risk of exposure to noise or air pollution, and there is therefore a relationship with EN16 (Pollution and Water Resources) and EN15 (Air Quality). Some allocations include specific measures to manage this issue, whilst on other sites this will need to be managed on a case-by-case basis as highlighted in the relevant policies.
10. There are high levels of need identified for both employment (EM1) and housing (H1) over the plan period. There are therefore competing demands for scarce available land in Reading, and one particular pressure is for loss of employment areas for residential, which is the subject of EM3 (Loss of

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

11. Whilst policy H2 seeks additional family-housing of more than 3 bedrooms, H8 allows, under some circumstances, conversion of larger accommodation to flats. This is because blocking all conversions would be unreasonable and inflexible, and could prevent some needs being met (which, in the urban areas are sometimes for smaller flats). This is addressed to an extent by clause (h) in policy H8, which requires the retention of at least one 2-bed (or larger) flat within any conversion.
- 3.7.2 Therefore, policies within the Local Plan Partial Update and Proposals Map are considered to be consistent with one another and, in many cases, help achieve each other's aims. Where there is a potential tension, it is generally resolved within the Plan itself.

3.8 Flexibility to Deal with Changing Circumstances

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

Changes to the Planning System

- 3.8.4 The most significant change to the planning system is the recent publication of a new NPPF in December 2024. The completed Form and Content Self-Assessment Toolkit (EV003) goes through elements of the NPPF including comments on how the Local Plan Partial Update aligns with the new requirements contained within the 2024 version. It is not considered that proposals in the new NPPF present a particular issue for the Local Plan Partial Update in terms of consistency.
- 3.8.5 The Government refers to a standard methodology for the calculation of housing need within the new NPPF. The methodology stated within the December 2024 NPPF, if applied, using most up-to-date figures, would result in an increase of Reading's housing need to 1,028 dwellings per annum. As the Local Plan has undergone the Regulation 19 Consultation prior to March 2025, the plan is to be examined against the December 2023 version of the NPPF.

- 3.8.6 Changes to the plan-making system were introduced through the Levelling Up and Regeneration Act 2024. This includes the introduction of a streamlined basis for local plans, the replacement of Supplementary Planning Documents with Supplementary Plans and the introduction of national development management policies. These changes require secondary legislation to take effect, and this has not yet been produced.
- 3.8.7 The changes to SPDs will affect how the Local Plan operates because those existing SPDs referred to in the plan will need to be replaced or will cease to have effect. However, transitional arrangements are expected to allow SPDs that relate to a plan prepared under the old arrangements to last for at least the first five years of the plan period, so this change would be addressed in the next five-year review of the plan.
- 3.8.8 National development management policies would have a substantial impact, as it is expected that they would supersede a number of the more general development management policies in the plan. It is not possible at this stage to be certain which of the policies would be affected, but if this were to happen then those policies would largely cease to be applied. It would be for the five-year review of the plan to identify updates necessary as a result of these policies.
- 3.8.9 In terms of other changes above those that have already been anticipated, there is always a chance that there may be changes that affect how part of the plan can be implemented. In a worst-case scenario, this may mean the need to carry out a further partial review of the Local Plan. In other cases, such as further liberalisation of changes of use, it may mean that parts of policies cannot be implemented. This will have to be addressed in future reviews.

Issues with Delivery of Housing Targets

- 3.8.10 The Local Plan Partial Update makes provision in H1 (Provision of Housing) to deliver 825 dwellings per year. The Housing Trajectory shows how this will be accommodated, through a mix of allocated sites, existing permissions and an allowance for delivery of small sites (less than 10 dwellings). This figure is expected to be challenging but is ultimately deliverable.
- 3.8.11 Within development allocations, other than where there are specific sensitivities that demand a different approach, the Local Plan Partial Update offers a flexible approach in terms of the number of dwellings and form of development on site insofar as is possible, ensuring that the plan is deliverable.
- 3.8.12 In overall terms, the Housing Implementation Strategy (EV014) looks in depth at the maintenance of a five-year housing land supply across the plan period. However, in general, any issues are most likely to arise towards the end of the plan period, and throughout this time there will have been opportunities within the five-yearly Local Plan reviews, based on updated land supply and housing figures within the Council's Annual Monitoring Report, to address this.

Heathrow

- 3.8.13 The Government announced its intention to expand Heathrow Airport in January 2025 following a 2018 parliamentary vote in favour of the scheme. An application for

development consent is expected in the next year, and works could theoretically begin before 2030. However, large infrastructure schemes in the past have been subject to very considerable delays due to legal challenges, so this may be subject to substantial change.

- 3.8.14 The HNA on which Reading's Local Plan Partial Update is based did not make any allowance for Heathrow. Although Reading would not be directly affected by physical works in the vicinity, there is little doubt that expansion at Heathrow would be likely to increase the need for housing and employment space in a wide area around the site, including Reading. It is estimated that the project would create 100,000 jobs in the area.
- 3.8.15 Such changes do not necessarily make a significant difference to how Reading plans to develop within its boundaries. The Local Plan Partial Update already seeks to accommodate as much development as Reading has the physical capacity for. Whilst there may be scope for specific changes to the overall strategy on specific sites, a large increase in the need for housing or employment is likely to result in a need that Reading has to meet outside its boundaries. The impacts on physical planning within Reading may be around infrastructure provision for any new urban extensions, particularly transport infrastructure, and ensuring that the type of employment provision is aligned with needs arising from Heathrow.
- 3.8.16 Development at Heathrow is unlikely to occur before 2030. At such time, the Council will be considering another five-yearly Local Plan review, and a matter of this significance is one that the review would need to address.

Delivery of Transport Infrastructure

- 3.8.17 Another potential set of changing circumstances is within the Local Transport Plan (LTP) (OP002). This document covers the period to 2040 and many of the schemes proposed are medium- to long-term projects.
- 3.8.18 The schemes that are particularly important to the delivery of the Local Plan Partial Update are set out in policy TR2 and/or the Infrastructure Delivery Plan. However, it is also important to bear in mind that the LTP was always intended to be a package of transport measures, allowing some flexibility in the exact schemes that came forward. The LTP and the Local Plan Partial Update do not therefore fail in the event that one or two small schemes do not come forward.

Changing Economic Circumstances and Viability

- 3.8.19 Recovery since the 2008 recession in Reading has been strong. In 2020, the Covid-19 Pandemic combined with other global factors such as the war in Ukraine, brought upon a period of high inflation with knock-on effects to development viability. These impacts are considered in the Local Plan Viability Testing Report (EV004).
- 3.8.20 One of the aims of the Local Plan Partial Update is to help ensure that the economy of Reading is not overly reliant on one particular sector. The Plan therefore seeks to maintain a sufficient supply of employment land to support a variety of uses, particularly industrial and warehousing space that is often squeezed out by higher

value uses. This approach is set out in the employment section and will provide flexibility in the face of possible economic change.

- 3.8.21 Viability of individual development sites is affected by policy requirements within the Local Plan Partial Update. The Local Plan Viability Testing Report (EV004) looks at current levels of viability and establishes that the requirements of the Local Plan Partial Update together with the Council's Community Infrastructure Levy (CIL) rates can be viably delivered at the current time. Policies usually include reference to viability considerations being taken into account. The Council is always open to discussions of viability where requirements would genuinely prevent a viable scheme coming forward.
- 3.8.22 The five-yearly Local Plan reviews will include re-testing of viability considerations to ensure that policies are not set at a level that stymies development. In addition to this, the amendment of CIL rates can take place outside, and quicker than, the Local Plan review process and can be used as a mechanism to take account of changing viability considerations. Rates may be revised upwards or downwards.

Climate Change

- 3.8.23 The effects of climate change are increasing and will continue to do so throughout the Local Plan period. Reading will continue to experience increasing overheating and flooding, as well as greater frequency and intensity of storm events. This will bring disruptive social and economic impacts. The Local Plan Partial Update identifies these risks and outlines various mitigation measures.
- 3.8.24 The likely impacts of climate change on flooding have been identified in the Strategic Flood Risk Assessment (EV027 and EV029) and the implications of this on the Local Plan Partial Update have informed the Sequential and Exceptions Test (EV026), so that sites which would become part of Flood Zone 3a are assessed on that basis.
- 3.8.25 Developments will need to be designed to be adaptable to the effects of climate change, as well as reduce their contribution to climate change. The Local Plan Partial Update includes the following policies to directly address this:
- CC2: Sustainable Design and Construction
 - CC3: Adaptation to Climate Change
 - CC4: Decentralised Energy
 - EN12: Biodiversity
 - EN14: Trees, Hedges and Woodlands
 - EN19: Urban Greening Factor
 - H5: Standards for New Housing

In addition to these policies, a number of other policies within the document should have a beneficial effect.

- 3.8.26 In terms of water shortages, all residential development within the Borough will need to comply with policy H5 (Standards for New Housing), which requires compliance with the most stringent water efficiency measures in the Building Regulations.

Council Devolution

- 3.8.27 The government published the English Devolution White Paper, Power and Partnership: Foundations for Growth on 16 December 2024, which states that the government wants all remaining two-tier areas in England to be eventually restructured into single-tier unitary authorities. Reading is a unitary authority neighbouring the two-tier Oxfordshire County Council. On 25 March 2025, Reading Borough Council set out a case for an expanded “Greater Reading” in a letter to the government, which follows West Berkshire Council’s intention to form part of Oxfordshire’s reorganisation proposals.
- 3.8.28 An increased Greater Reading area would result in new challenges and opportunities and would require a re-assessment of development and economic needs, based on a potentially larger land area forming part of the borough.

Conclusion

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

4. Background to Specific Policies

- 4.0.1 This section takes each policy updated during the Local Plan Partial Update in turn and summarises the relevant background to how the policy has been formulated, including national policy, facts and figures and other considerations. In each case, the following sections describe why reasonable alternative options (which correspond to those options assessed through the Sustainability Appraisal process) have been rejected. It also includes justification of any thresholds, where relevant.
- 4.0.2 In some cases, much of the background is in another document that forms the evidence base, and where this is the case, the sections below do not seek to repeat information. This is particularly the case for site allocations, where the HELAA (EV015 and EV016) looks at each site in depth in terms of its suitability, availability and achievability, and generally sites that are identified as being deliverable, developable or potentially developable in the HELAA are brought forward as allocations, unless they are already covered by a planning permission that is expected to be implemented.

4.1 CC2: Sustainable Design and Construction

Key Considerations

- 4.1.0 The NPPF states that one of the three overarching objectives of the planning system is environmental – “to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy” (paragraph 8). It states that Local Planning Authorities should “help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure” (paragraph 152).
- 4.1.1 New development has an important role in reducing environmental harm. The amount of proposed development in Reading has the potential to significantly increase emissions and energy consumption. These impacts must be minimised by requiring developments to meet the highest possible environmental standards in terms of materials, energy, water use, waste and emissions.
- 4.1.2 A Climate Change Emergency Strategy was prepared in 2020 (OP004) to cover the period to 2025. This notes good progress in terms of reducing Reading’s carbon footprint since 2005. The document outlines the path for Reading to achieve net zero by 2030 in line with the ambitions of the Council. It includes the following aims:
- Ensure that new properties are built to a net zero standard;
 - Reduce energy demand in existing buildings through deep retrofit;
 - Increase local renewable capacity;
 - Increase the adaptive capacity of the built environment;
 - Consider embodied energy in building materials; and

- Continue to develop planning policies towards these ends.
- 4.1.3 The existing policy CC2: Sustainable Design and Construction in the 2019 Local Plan requires specific standards that have secured significant improvements within the Borough but are now considered out-of-date. It relies on BREEAM standards when more ambitious standards could be achieved. Moreover, the Building Regulations have since been significantly updated. For example, BREEAM Very Good has now been superseded by updates to Part L. Additionally, some applicants have expressed that they are experiencing difficulty securing a BREEAM assessment. Building to very high standards of sustainability is now a common expectation within the development industry and many occupiers expect this.
- 4.1.3 Although updates to Part L are a welcome improvement, all development built to Part L standards is not zero carbon and therefore will contribute to emissions within the Borough. Local Planning Authorities are permitted to implement standards improving on the limits set in the Building Regulations in order to drive proportionate local response to local and national climate action targets. High sustainable design and construction standards also help to prevent the need for costly retrofit projects in the future.
- 4.1.5 Across the industry, best practice is now considered to be measurement of total energy use and space heating demand, rather than relative to the Building Regulation, and this is reflected in the proposed changes to the policy. Policy H5 (Standards for New Housing) proposes sustainable design and construction requirements for new-build residential development, and specific standards for housing are dealt with in H5, although the general principles of CC2 will be applied to residential development as well.
- 4.1.6 The specific figures required in the policy for site average space heating demand, site average total energy demand and per unit maximum total energy demand are based on the figures recommended by LETI's Climate Emergency Design Guide⁸ but are expressed either with as a range or an absolute value with a modest increase from the LETI figures in order to provide flexibility. The figures within the LETI guide were developed in collaboration with the UK Green Building Council and the Better Buildings Partnership and with the support of the Good Homes Alliance, RIBA and CIBSE. The figures within the proposed policy option are reflective of adopted Local Plan policies elsewhere, such as Central Lincolnshire⁹. Specific thresholds for embodied carbon assessment (5000 m² and the corresponding score required) are also reflective of best practice elsewhere, such as Bath and Northeast Somerset¹⁰.
- 4.1.7 An existing Sustainable Design and Construction Supplementary Planning Document (SPD) (PP012) is in place and the general principles, where in compliance with the overall policy, will continue to apply.

⁸ [Climate Emergency Design Guide | LETI](#)

⁹ [Energy Efficiency Design Guide](#) – Central Lincolnshire

¹⁰ [Sustainable Construction Checklist SPD \(PDF\).pdf](#) – Bath and Northeast Somerset

Policy Options

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

- **CC2 (i) Proposed updates to require the highest possible level of sustainability per local and national guidance, based on best-practice method of measuring total energy demand and space heating demand, including justification for demolition of buildings and subject to viability considerations – PROPOSED OPTION**

The proposed changes will significantly contribute to achieving Reading's zero carbon target, as well as help to mitigate the local effects of climate change and reduce occupant costs. Given the anticipated level of growth in the Borough in the coming years, it is imperative that new development is as environmentally sustainable as possible. This approach reflects the adopted policies of many other Local Planning Authorities. The proposed "exceptional basis clause" will ensure that these requirements do not prevent development coming forward for reasons of viability.

- **CC2(ii) Continue with existing policy – REJECTED**

This option would contribute to reducing emissions, but not to the extent necessary to prevent the need for costly retrofit in the future or meet Reading's net zero goal. Because the BREEAM standards give high scores to development in urban areas that use previously developed land are close to facilities and transport, it is possible under this option for development in Reading to achieve BREEAM 'very good' without making a significant effort to reduce waste or emissions. Other elements of the policy are now out-of-date. This approach does not provide flexibility for applicants who wish to use certification schemes other than BREEAM.

- **CC2(iii) No policy – REJECTED**

This approach would rely on Part L of the Building Regulations. The Building Regulations represent the legally allowable poorest values and do not represent best practice. This would result in carbon emissions across the Borough and increase the need for future retrofit. Furthermore, there is uncertainty regarding timescales for forthcoming updates the Building Regulations. The current proposed definition for the Future Buildings Standard as proposed by government is "net zero ready" rather than net zero. This will require an estimated 75% emissions reduction relative to the 2021 regulations as it is dependent on the full decarbonisation of the electricity grid. Additionally, there is also often a as-built energy performance gap whereby development falls short of meeting emissions targets post-occupancy.

- **CC2(iv) Update the policy, but with less ambitious target emissions rate requirements – REJECTED**

This could require, for instance, a minimum improvement past the stated carbon emissions rate, usually expressed as a 35% improvement of the target emissions rate. This would result in an improvement but would not go far enough to achieve net zero aims.

4.2 CC3: Adaptation to Climate Change

Key Considerations

- 4.2.1 The NPPF states in paragraph 154 that “new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.”
- 4.2.2 Adaptation measures help to improve the quality of life for residents in the face of climate change and address the effects of intense rainfall, flooding, heatwaves, droughts and subsidence. These impacts will increasingly affect homes and businesses, essential services such as transport, healthcare, water supply and energy and the natural environment.
- 4.2.3 The Strategic Flood Risk Assessment (EV027 and EV028) examines scenarios for flood risk and finds a number of areas, particularly around Central Reading, where flood risk is expected to worsen due to climate change.
- 4.2.4 There is an existing policy CC3: Adaptation to Climate Change that applies to all development. This policy has been implemented effectively to ensure that measures are designed into developments from the outset.
- 4.2.5 Changes are required in order to address the greater emphasis on adaptation afforded within recent national planning policy, as well as local guidance that has been published since 2019, such as the Reading Climate Change Emergency Strategy (2020), the Sustainable Design and Construction SPD (2019) and the Reading Climate Change Adaptation Plan (2019). Changes are also proposed to restructure the policy around the three most significant climate risks to Reading (overheating, flooding and extreme storms).
- 4.2.6 This policy should be applied in tandem with other policies detailing adaptability, such as CC2: Sustainable Design and Construction and EN18: Flooding and Sustainable Draining Systems.

Policy Options

- 4.2.7 The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below:
 - **CC3(i)** – Proposed updates to refer to up-to-date local and national guidance, strengthen the language to give greater weight to climate change adaptation-
PROPOSED OPTION
This option relies on the existing policy position, but with greater emphasis on the importance of adaptation measures in line with the increased weight affording in the NPPF. It will bring more positive effects to address local impacts of climate change and requires developers to consider measures which are not considered under other sustainability policies. This policy will allow officers to consider refusal if measures are not appropriately incorporated and will help to ensure that adaptation measures are considered from the outset.
 - **CC3(ii)** – Continue with existing policy – **REJECTED**

This would result in a policy that does not refer to the most up-to-date strategies in place and does not give appropriate weight to adaption measures, particularly given the urgency of the climate emergency.

4.3 CC4: Decentralised Energy

Key Considerations

- 4.3.1 Reading adopted the Climate Emergency Strategy in 2020 which identifies a number of actions across a number of partners to address the climate emergency. This includes an action (E11) to work with developers to maximise district energy solutions in line with the Local Plan policies on decentralised energy, including establishing district heat, investigating the potential of rivers, ground and aquifers in Reading for renewable heat and implementing heat pump schemes. Although work has been undertaken on identifying options for district heat networks in the town centre, this has not yet progressed to the establishment of such networks. This is an evolving issue, and the policy should be considered for update to ensure that it is as robust and up-to-date as possible.
- 4.3.2 New Government requirements for heat network zoning are forthcoming. These will require that all buildings within specific heat network zones are required to connect to a heat network within a prescribed timeframe. Following the work by the Council working with Heat Network Delivery Unit in the Governments department of Energy Security and Net Zero, a heat-mapping and master-planning study was produced by Element Energy and subsequently two feasibility studies for the North of Station and Minster Quarter areas. These represent the two main opportunity areas in the Town Centre. Schemes which fall in these areas are considered to be strategically significant to enable the viability of town centre heat network(s). Potential for heat networks continues to be explored across the town centre, much of which is expected to fall within a Heat Network Zone in the upcoming Heat Network Zoning Regulations.

Policy Options

- 4.3.3 **CC4(i)** – Incorporate references to the Climate Emergency Strategy and progress on establishing district heat networks, add reference to Heat Network Zoning and local energy storage - **PROPOSED OPTION**

This option would promote the Council's ongoing work on Heat Network Zoning and ensure the policy is up to date with the latest Government requirements while meeting the ambitions and goals of the Climate Emergency Strategy.

- 4.3.4 **CC4(ii)** – No changes proposed - **REJECTED**

This would result in a policy that does not refer to the most up-to-date strategies in place and the ongoing work in the borough in relation to heat networks, particularly given the urgency of the climate emergency.

4.4 CC7: Design and the Public Realm

Key Considerations

- 4.4.1 Updates to the NPPF in recent years have placed a greater emphasis on the role of design within the planning system. It states that "good design is a key aspect of

sustainable development, creates better places in which to live and work and helps to make development more acceptable to communities (paragraph 126).” Recent legislation and the updated NPPF also state the requirement for local authorities to establish local design codes consistent with the principles set out in the National Design Guide and National Model Design Code in order to provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design (paragraph 128).

- 4.4.2 The existing policy applies to all development and has been well-used in influencing design across the Borough but is now out-of-date as it is not aligned with emerging national design guidance. Changes are proposed that will provide the basis for forthcoming design code(s) in Reading in the coming years.
- 4.4.3 Policy CR2: Design in Central Reading outlines more detailed requirements for applications within Central Reading as this area contains the highest concentration of heritage assets, the highest density of residents and a mix of uses.

Policy Options

- 4.4.4 **CC7(i)** – Amendments to provide the basis for the forthcoming design code requirements and to align objectives with those stated in the National Model Design Code - **PROPOSED OPTION**

This option would promote high-quality design outcomes and update the policy to account for the increasing weight given to design considerations in national policy. It will future-proof the policy for forthcoming design code(s).

- 4.4.5 **CC7(ii)** – No changes proposed - **REJECTED**

This option would continue to deliver high-quality design outcomes to an extent but is more limited in its scope and does not refer to the most up-to-date national design guidance.

4.5 CC9: Securing Infrastructure

Key Considerations

- 4.5.1 The NPPF emphasises provision of infrastructure as a key part of building a strong economy, as well as making growth sustainable. It states that “strategic policies should [...] make sufficient provision for [...] infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); community facilities (such as health, education and cultural infrastructure); and [...] green infrastructure (paragraph 20).”
- 4.5.2 The Local Plan Partial Update includes an updated Infrastructure Delivery Schedule (Figure 10.2) which outlines the infrastructure necessary to support growth throughout the plan period. The schedule is accompanied by an Infrastructure Delivery Plan (EV005) that explains each category of infrastructure in turn and describes the strategy, existing provision, capacity issues, impact of future growth and priorities for meeting need. Development Proposals are expected to mitigate all relevant impacts in accordance with criteria and rate of contribution and/or levy, taking account of levels of development that have already been accepted and any mitigation measures agreed or implemented. In some cases, it will not be possible for

reasons on viability for development to mitigate all relevant impacts. Thus, the Council will take into account the priorities listed in Policy CC9.

- 4.5.3 The Community Infrastructure Levy (CIL) allows local authorities to raise funds from owners or developers of land undertaking new building projects in the area. CIL was implemented in Reading on 1 April 2015, and the CIL Charging Schedule makes up part of the evidence base (PP007). The Infrastructure Funding Statement (PP009) sets out the full range of infrastructure items that will be funded by CIL. The Annual Monitoring Report, published in December each year, details collection, spend and retention of CIL. A Supplementary Planning Document on Section 106 agreements (PP013) was introduced to accompany CIL in 2015, and this continues to have effect in relation to this policy. This provides more information on the scale and form of obligation, the financial contribution sought, the role of pooled payments, maintenance payments and charges for preparing agreements.
- 4.5.4 Existing Policy CC9: Securing Infrastructure has been implemented successfully to require developer contributions for infrastructure but contains out of date references to limits on pooling S106 payments which no longer apply. Additionally, it does not refer to Infrastructure Funding Statements. Finally, due to the increasing strain experienced by the NHS, the proposed policy increases the priority level for healthcare facilities. It also refers to “digital connectivity” to address the growing importance of information technologies for economic development.
- 4.5.5 In terms of employment development, Reading’s tight labour market means that there is a gap between the numbers of economically active people in the job market and the numbers of jobs in the area. Further employment development that is not already accounted for within the figures that underpin both the HNA (EV011) and the Commercial Development Needs Assessment (EV006-EV009) will add to that gap, leading to pressure on local housing from employees moving to the area to be near to their jobs, and therefore on the affordability of housing, and/or long distance commuting. Such development is not therefore sustainable unless it is appropriately mitigated. The Council has therefore long, and successfully, sought contributions from major employment development towards affordable housing, dating back to at least 2000 and will continue to do so.

Policy Options

- 4.5.6 **CC9(i)** – Added reference to digital infrastructure, increased priority for healthcare infrastructure and amendments to the supporting text, including incorporation of elements of the Employment and Skills Training SPD - **PROPOSED OPTION**

This option will help to deliver much needed healthcare infrastructure and bring the policy up-to-date with regard to changes to S106 pooling restrictions, Infrastructure Funding Statements and digital connectivity.

- 4.5.7 **CC9(ii)** – Continue with existing policy - **REJECTED**

Although most spending priorities (with the exception of healthcare) would remain unchanged, the policy would be out-of-date for the reasons outlined above.

4.6 CC10: Health Impact Assessment

Key Considerations

- 4.6.1 The NPPF states that “planning policies should aim to achieve healthy, inclusive and safe places which [...] enable and support healthy lifestyles, especially where this would address identified local health and well-being needs” (paragraph 92).
- 4.6.2 A new policy requiring health impact assessments (HIA) would require that developers consider impacts on the health of local residents from an early stage. This will identify and negative health impacts arising from development and require that these are mitigated.
- 4.6.3 It is proposed that this policy apply to all major developments and any development for accommodation for vulnerable people, due to the specific sensitivities and needs of these populations. An HIA should include an assessment of identified population groups, key health issues in the local area and an analysis of the health impacts of the built environment on the site and its surrounding area. The level of detail within the HIA should be proportionate to the development and should refer to guidance from Public Health England, as cited in the policy itself.
- 4.6.4 By addressing health impacts from an early stage, development can reduce the burden on healthcare providers within the Borough by encouraging physical activity and healthy lifestyles.

Policy Options

- 4.6.5 **CC10(i)** – Include new policy to require HIA for major developments and accommodation for vulnerable people - **PROPOSED OPTION**

This option will help to deliver healthy communities which improve the wellbeing of residents and reduce the burden on healthcare providers. It will help to mitigate any negative health effects of development and ensure that health is considered at a very early stage.

- 4.6.6 **CC10(ii)** – No policy - **REJECTED**

This option would fail to address health and may result in poor designs that discourage physical activity, worsen local health inequalities and increase the burden on healthcare providers.

4.7 EN4: Locally Important Heritage Assets

Key Considerations

- 4.7.1 This policy deals with buildings and structures that are a significant part of Reading's built environment, but which are not so significant as to qualify for national designation. Although a local list is not required by the NPPF, it can be used as a tool to extend protection to assets. Without a policy, any local assets that are not formally listed are vulnerable to loss or degradation.
- 4.7.2 Small changes are proposed to this policy to bring it in line with paragraph 201 of the NPPF. The existing policy could be argued to go even further than the approach to designated assets, as it states that benefits should “significantly outweigh harm or loss.” Additionally, it is proposed to be amended to refer to “the decision-maker”

rather than “the Council” so as to apply in the instance of appeal. Finally, the supporting text is proposed to be amended to specify that the policy does not apply to assets with a national designation, as the aim of this policy is to provide protection for those assets which do not benefit from national designation.

Policy Options

4.7.3 **EN4(i)** – Proposed changes to bring the policy in line with paragraph 201 of the NPPF - **PROPOSED OPTION**

This option will reduce uncertainty and address issues that have arisen during appeal decisions. It will help to preserve elements of Reading’s historic environment that do not benefit from national designation.

4.7.4 **EN4(ii)** – Continue with existing policy - **REJECTED**

This option will continue to help prevent loss of local heritage assets but fails to address uncertainty about how to apply the policy in the context of national policy.

4.8 **EN7: Local Green Space and Public Open Space**

Key Considerations

4.8.1 This policy defines areas that should be protected from development as either Local Green Space (LGS) or Public Open Space (POS).

4.8.2 In general, the overall policy context remains valid. The NPPF still emphasises the need for open spaces to be assessed to support local plans and updates proposed to this policy aim to reflect changes that have occurred on the ground since the last Local Plan was adopted. The following changes have affected defined areas of Local Green Space and Public Open Space and therefore, it is considered necessary to revise the boundaries of these areas to reflect existing conditions:

- A new primary school has been constructed at Mapledurham Playing Fields (EN7Nn). Therefore, an amendment is proposed to remove the area of the school from the existing designation, reducing the total area from 10.86 ha to 10.35 ha.
- A new leisure facility has been constructed at Palmer Park with part of a new car park located on land designated as LGS. Moreover, land that was previously car park is now public space. Therefore, a change is proposed to remove the area that is now car park and add the area that was previously car park. This would reduce the total area very slightly from 16.07 ha to 16.06 ha.
- Two developments have been completed at Rivermead and Thameside Promenade (EN7Wp). This is mainly on an area that was previously car park but includes a small area that was designated as LGS. Demolition of some existing buildings has created new public space. Additionally, a new secondary school has been built on site which results in the loss of a small area of LGS. Therefore, a change is proposed to amend the boundaries, reducing the area slightly from 16.83 ha to 16.08 ha.

- 4.8.3 Although a small scout hut has been constructed at Kensington Park (EN7Wi), it is not considered necessary to amend the boundary of the designation as the scout hut replaced an existing scout hut.
- 4.8.4 The Call for Sites exercise resulted in a proposal to add two existing development allocations (WR3s: Land and Kentwood Hill and WR3t: Land at Armour Hill) to the adjoining designated Local Green Space (EN7Wu). This would result in the removal of the development allocation. Therefore, the land at WR3s and WR3t have been assessed under the criteria for LGS within the NPPF (paragraph 102). Upon assessment, it was determined that a very small area of the allocations do meet the criteria. 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.
- 4.8.5 Additionally, a Playing Pitches Strategy (OP007) has been adopted since the last Local Plan. It recommended a number of site-specific protections for certain pitches within the Local Plan. Whilst some of these pitches fell within areas protected under EN7, there were several that did not. Upon assessment, it was determined that many of these are covered by OU1, which aims to protect school playing feeds and as such, it is not considered that additional protection is needed. Other sites were covered by existing site-specific policies within the Plan that address the loss of any existing open space. Only one site recommended for protection under the Playing Pitch Strategy was not covered by existing policies (Scours Lane and Ibis Club). Therefore, a change is proposed to designate this area as LGS due to its recreational value in line with the criteria of the NPPF.

Policy Options

- 4.8.4 **EN7(i)** – Alter boundaries to account for changes on the ground on some existing LGS sites, include small areas of Land at Armour Hill and Land at Kentwood Hill within the Victoria Recreation Ground LGS designation, inclusion of Ibis Club and Scours Lane – **PROPOSED OPTION**

This option would bring the policy up-to-date given changes on the ground since the adoption of the Local Plan. It would also protect the most wildlife rich areas of Land at Armour Hill and Kentwood Hill and protect an additional playing pitch that is not covered by other policies.

- 4.8.5 **EN7(ii)** – Retain existing LGS boundaries – **REJECTED**

This option would result in boundaries that are out-of-date.

- 4.8.6 **EN7(iii)** – Identify two additional sites (WR3s and WR3t) as LGS - **REJECTED**

This option would designate areas that do not meet the specific criteria for LGS outlined in the NPPF. It would also result in the loss of two sites allocated for housing.

4.9 EN12: Biodiversity

Key Considerations

- 4.9.1 This policy aims to ensure that biodiversity in Reading is protected and enhanced. It includes protection of sites of identified importance, establishment of a green network across the town and requiring a net gain of biodiversity.
- 4.9.2 The NPPF states that “planning policies and decisions should contribute to and enhance the natural environment by: protecting and enhancing [...] sites of biodiversity [...] and soils (in a manner commensurate with their statutory status or identified quality in the development plan) and [...] minimise impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures” (paragraph 174).
- 4.9.3 The existing policy takes a proactive approach by providing strategic direction on biodiversity issues in Reading and attempts to link fragmented habitats together into a network. Reading does not contain any internationally designated sites for wildlife or nationally designated sites, but does contain locally-designated sites such as Local Wildlife Sites (LWS), Local Nature Reserves (LNRs) and Biodiversity Opportunity Areas (BOAs).
- 4.9.4 The national policy context with regard to Biodiversity has changed significantly since the adoption of the Local Plan. The Environment Act 2021 introduced a mandatory 10% biodiversity net gain (BNG) on development sites from January 2024 (major sites) and April 2024 (all sites). It also requires the establishment of Local Nature Recovery Strategies and introduces conservation covenants to secure improvements. In addition, the Council has produced a Biodiversity Action Plan (2021, OP008) to accompany the Reading Climate Emergency Strategy (OP004) both of which contain actions relevant to planning policy.
- 4.9.5 Although there is some local support for requiring BNG at levels above 10%, the PPG states that plan makers should not seek a higher percentage unless justified. Given the urban nature of the Borough, a higher increase is likely to present difficulties in delivery and may affect viability. Therefore, the proposed policy aims to require BNG at levels in line with legislation.
- 4.9.6 The proposed policy generally expects that BNG will be delivered on-site, where possible. Where this is not possible, the urbanised nature of Reading may make off-site delivery within the Borough difficult. Therefore, a language is included to ensure that delivery off-site is still occurring within Borough, where possible, in areas identified within the Council’s Natural Environment SPD. In the longer term, Local Nature Recovery Strategies (LNRS) will guide opportunities for biodiversity improvement.
- 4.9.7 Because the biodiversity net gain metric excludes ‘irreplaceable habitat,’ it is proposed that the policy ensure it is protected in its own right. Additionally, because some sites within Reading will have zero existing value under the metric, it is proposed that all sites seek BNG where possible. A new policy (EN19: Urban Greening Factor) will also help to address this gap.

4.9.8 Changes are also proposed to refer to actions within the Reading Climate Emergency Strategy (OP004) and the Biodiversity Action Plan (OP008) such as:

- identifying wildlife corridors and assessing their quality;
- managing the impact of development areas on wildlife corridors;
- considering the impact on soils;
- ensuring development does not increase light spillage over watercourses;
- ensure new landscaping adjacent to watercourses is native and wildlife friendly; and
- require the re-naturalisation of the river bank when new development is adjacent to it.

Policy Options

4.9.9 **EN12(i)** – 10% Biodiversity Net Gain (BNG) with off-site compensation mechanism, specific consideration for soils, light spillage, native planting, and wildlife friendly design, no spatial requirements for off-site BNG – **PROPOSED OPTION**

This option would bring the policy up-to-date given changes nationally since the adoption of the Local Plan and ensure that biodiversity in Reading is protected and enhanced. It would provide clarity for applicants and officers in applying BNG locally, as well as improve biodiversity on sites where BNG is not required.

4.9.10 **EN12(ii)** – Do not update the policy – **REJECTED**

This option would fail to account for new national biodiversity Net Gain requirements and would lead to confusion and uncertainty.

4.9.11 **EN12(iii)** – Increase the BNG requirement to 20% - **REJECTED**

Although this option would bring greater positive effects with regard to biodiversity, it may impact viability. At this stage, the Council has limited experience with new BNG requirements and it is considered preferable to implement the policy at statutory level at this time. A 20% increase is likely to be difficult to deliver in practice, given the urban nature of the Borough.

4.10 EN14: Trees, Hedges and Woodlands

Key Considerations

4.10.1 The NPPF states that “when determining planning applications, local planning authorities should refuse development resulting in the loss or deterioration or irreplaceable habitats (such as ancient woodland and ancient or veteran trees) unless there are wholly exceptional reasons and a suitable compensation strategy exists” (paragraph 180). It also states that “trees make an important contribution to the quality of urban environments and can also help mitigate and adapt to climate change” (paragraph 131). National policy emphasises that trees should be incorporated into new development and existing trees should be retained.

4.10.2 This policy aims to protect existing trees, hedges and woodlands where they are of importance and ensure that new tree planting takes place on development sites. It also refers to the changes within the 2021 Environment Act and the Council's

updated Tree Strategy which was adopted in 2021 (OP003). The proposed policy increases canopy cover ambitions, gives spatial direction for planting, refers to preference for tree-lined streets, emphasises protection for veteran and ancient trees and refers to BNG and LNRS.

Policy Options

- 4.10.3 **EN14(i)** Update the policy to refer to Tree Strategy, changes to NPPF, BNG and consideration of impacts on the historic environment – **PROPOSED OPTION**

This option will bring the policy up-to-date and increase tree cover within the Borough by referring to ambitious goals for canopy cover, as well as protecting existing trees. It reflects a proactive approach that seeks additional planting in new developments and aims to rectify deficiencies identified in Reading. It will help to deliver beneficial effects in terms of quality of life, adaptation to climate change, biodiversity, air quality, landscape and townscape.

- 4.10.4 **EN14(ii)** Do not update the policy – **REJECTED**

This option would fail to incorporate important elements of the Tree Strategy or refer to recent changes in national policy. It would fail to maximise its potential to address the Climate Emergency.

- 4.10.5 **EN14(iii)** Require a minimum canopy level – **REJECTED**

Because sites are extremely varied within Reading and much of the Borough is urbanised, this is not considered appropriate. For instance, many sites within the town centre are developed at high plot coverage and little room is left for planting without affecting viability.

4.11 EN18: Flooding and Sustainable Drainage Systems

Key Considerations

- 4.11.1 National policy emphasises the growing risk of flooding and the importance to consider flood risk and mitigate impacts at a very early stage. The NPPF states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future) (paragraph 159).” It requires that “strategic policies are informed by a strategic flood risk assessment, and should manage flood risk from all sources [...] including considering cumulative impacts (paragraph 160).”
- 4.11.2 In preparing local plans, local planning authorities are required to produce a Strategic Flood Risk Assessment (SFRA). Allocations of sites should accord with the sequential and exception test and should be based on the SFRA.
- 4.11.3 A Strategic Flood Risk Assessment to support the Local Plan has been prepared (EV027) and was published in November 2024. This considered which areas are at risk of flooding and from which sources. It maps the functional floodplain, within which most development will be unacceptable, and considers scenarios for worsening flood risk due to climate change. The SFRA will be a key tool for the development management process where sites are at risk of flooding.

- 4.11.4 Much of the floodplain within Reading remains undeveloped, but there are built-up areas at significant risk of flooding, such as Lower Caversham, north of the Thames, parts of central Reading between the railway and the Thames, areas around the Kennet, commercial land within South Reading and parts of West Reading nearest the Thames. The fact that most of the land available for development is within central and south Reading makes it likely that some locations will be in areas at increased risk of flooding.
- 4.11.5 Since 2015, national policy has required sustainable urban drainage systems (SuDS) on major developments. The proposed policy aims to require SuDS on all sites, where possible, and refers to the Government's Technical Standards¹¹. It specifies that surface water cannot drain to foul sewer as this is a major cause of flooding. Other changes proposed within the policy are proposed following comments from the Environment Agency.

Policy Options

- 4.11.6 **EN18(i)** – Update policy to reflect national changes, refer to the updated SFRA, include reference to various types of flooding and strengthen support for SuDS – **PROPOSED OPTION**

This would bring the policy up to date by referring to recent changes in national planning policy and legislation, particularly with regard to worsening flood risk due to climate change. This option will continue protect residents and property from flooding.

- 4.11.7 **EN18(ii)** – Retain existing policy – **REJECTED**

This option would fail to refer to the most up-to-date guidance and may result in inappropriate development. It may also miss opportunities to ensure that surface water runoff is reduced as much as possible, leading to cumulative effects within the Borough.

4.12 EN19: Urban Greening Factor

- 4.12.1 Although BNG will result in significant protection and enhancement of biodiversity in the Borough, many potential development sites have no existing green space or vegetation and as such there will be no mandatory requirement for BNG under national guidance. Therefore, a new policy is proposed to ensure that all sites make a contribution, where possible. Urban Greening Factor (UGF) cannot be used in place of any other policy requirements, such as mandatory BNG or other requirements within EN12 (Biodiversity).
- 4.12.2 The policy aims to employ a simple method for the Council to assess how much green cover is provided on site and can include a wide range of green infrastructure, including green roofs, trees, modified grassland, semi-natural vegetation (e.g. woodland) and garden planting. This is intended to give applicants multiple ways to deliver green cover and reduce impacts on viability.

¹¹ [Sustainable drainage systems: non-statutory technical standards - GOV.UK](https://www.gov.uk/guidance/sustainable-drainage-systems-non-statutory-technical-standards)

- 4.12.3 A UGF calculation tool is included in Appendix 3 of the Local Plan Partial Update. It is based on guidance from Natural England¹² and the London Plan¹³, and has been amended to suit the local context in Reading.

Policy Options

- 4.12.4 **EN19(i) – New policy to require proposals to demonstrate how an appropriate proportion of green cover will be delivered on sites through UGF – PROPOSED OPTION**

This option will increase the amount of green cover in Reading, which contributes to urban cooling, reduced water runoff, well-being for residents and biodiversity. It will help to obtain biodiversity improvements on sites that are not subject to BNG under national legislation.

- 4.12.5 **EN19(ii) – No policy – REJECTED**

This option would result in sites that are not subject to BNG being subject to no requirement for increased green cover. This would miss an opportunity to provide the benefits listed above, particularly in light of the climate emergency.

- 4.12.6 **EN19(iii) – Do not include new policy but refer to UGF in existing policies – REJECTED**

This option would likely result in increased green cover across the Borough, but would not give the proper weight or consideration to green cover. A separate policy aims to draw attention to the issue and give development management officers an additional tool to secure improvements.

4.13 EM1: Provision of Employment Development

Key Considerations

- 4.13.1 The NPPF places significant importance on the role of local planning policies to “support economic growth and productivity, taking into account both local business needs and wider opportunities for development” (paragraph 81).
- 4.13.2 The existing policy aims to identify the level of employment development required and address impacts on the demand for housing. The existing policy is based on the Central Berkshire Economic Development Needs Assessment (October 2016) which identified employment floorspace needs based on three scenarios (labour demand, past completion rates and labour supply).
- 4.13.3 The evidence on which figures in the existing policy is based is now more than six years old and pre-dates the Covid-19 pandemic, which has significantly affected working patterns and the need for additional space. Therefore, a Commercial Development Needs Assessment (EV006-EV009) for Reading was carried out in 2024. The proposed policy revises the assessed level of need for different floorspace types. It determines that there is scope to accommodate the full level of need within

¹² [Urban Greening Factor for England – Development and Technical Analysis - NERR132](#)

¹³ [Urban Greening Factor \(UGF\) guidance | London City Hall](#)

Reading Borough, dependent on not including the safety margin or allowance for future losses.

Policy Options

- 4.13.4 **EM1(i)** – Revised policy to refer to updated needs for office, industrial and warehouse floorspace based on the latest data – **PROPOSED OPTION**

This will bring the policy up-to-date and ensure that applications are decided in a way that correctly allocates commercial floorspace according to evidence-based economic needs within Reading.

- 4.13.5 **EM1(ii)** – Do not update the policy – **REJECTED**

This would result in an out-of-date policy that could negatively impact the ability of the Borough to accurately plan for floorspace and could impair economic development. It would also fail to take account of changes that have occurred since the Covid-19 Pandemic.

4.14 H1: Provision of Housing

- 4.14.1 The NPPF states that “strategic policies should, as a minimum, provide for objectively assessed needs for housing [...] as well as any needs that cannot be met within neighbouring areas, unless i. the application of policies in the Framework that protects areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.” (paragraph 11).
- 4.14.2 According to paragraph 61 of the NPPF, “strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.” This serves as an advisory starting point for determining the housing requirement. The PPG sets out the standard method. A Housing Provision Background Paper (EV012) details application of the standard method for Reading. It also illustrates a case for exceptional circumstances to justify an alternative approach to housing need.
- 4.14.3 Due to a combination of factors such as identified in the Housing Provision Background Paper (EV012), Reading is in a unique position amongst other Local Authorities. As such, a local HNA (EV011) was commissioned to objectively assess local needs. This considered the basis for the standard method in Reading, identified exceptional circumstances and undertook an alternative approach. It determined a figure of 735 homes per year.
- 4.14.4 Following the assessment of local housing need, the HELAA (Nov 2024, HELAA) identified the amount of housing that can be delivered within the Borough during the plan period. This work resulted in an annual figure of 825 dwellings.
- 4.14.5 Therefore, capacity exists to exceed the identified need determined by the HNA. The Local Plan Partial Update therefore bases the housing provision figure in policy H1 on capacity, at 825 dwellings per annum.

- 4.14.6 The Local Plan Partial Update aims to deliver sufficient homes to exceed the local housing need of the area based on the findings of the HNA. However, it is considered necessary to understand the implications in terms of unmet need should the plan rely on the need calculated under the standard method. Therefore, in August 2024, the Council wrote to nine local planning authorities within 10 km of the Reading Borough boundary under the Duty to Co-operate to understand the scope to meet any unmet needs from Reading in the event that the Local Plan Partial Update was to be based on figures from the standard method. A Duty to Co-operate Statement (EV001) sets out the request and the responses to it, however, in summary, there was no scope identified to meet any unmet housing needs from Reading should they arise. This identified an unmet need of 954 dwellings over the plan period.

Policy Options

- 4.14.7 **H1(i) – housing provision of 825 homes per year (based on capacity) – PROPOSED OPTION**

This option would provide housing exceeding local needs according to the capacity of the Borough. It would also avoid giving rise to unmet need that would be required to be accommodated within other authorities, and would make a contribution to significantly boosting housing supply above identified needs.

- 4.14.8 **H1(ii) – do not update the policy – REJECTED**

This option would fail to comply with national policy.

- 4.14.9 **H1(iii) – housing provision of 878 homes per year (based on standard methodology) – REJECTED**

This option would provide for the full level of need calculated under the standard methodology. However, the HELAA indicates that based on capacity in Reading this would not be possible to accommodate in full. This would create a level of unmet need to be met elsewhere. This option would also fail to take account of exceptional circumstances within Reading.

- 4.14.10 **H1(iv) – housing provision of 735 homes per year (based on local need as determined in the HNA) – REJECTED**

This option would provide for the locally-assessed housing need. However, capacity analysis has indicated that there is an opportunity to substantially boost housing provision above this level.

4.15 H2: Density and Mix

- 4.15.1 The NPPF states that “planning policies and decisions should support development that makes efficient use of land (paragraph 124).” It also states in paragraph 62 that “the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.”
- 4.15.2 This policy sets out guidance for residential density in different areas within the Borough. It also requires that larger developments outside the centre deliver family housing to help meet need. It also requires consideration of self-build homes.

- 4.15.3 The existing policy H2 states indicative density ranges for different area types (town centre, urban and suburban). The existing policy ranges were derived from national policy that has now been superseded. Paragraph 125 of the NPPF now states that there should be minimum density standards for city and town centres and other areas well served by public transport, and that these should seek a significant uplift in density of residential areas unless there are strong reasons this would be inappropriate. It also states that minimum standards should be considered for other areas.
- 4.15.4 Stating density ranges can be challenging as densities vary widely across the Borough and some areas have more constraints than others, such as a concentration of heritage assets within the town centre. This means that minimum densities either need to be set at a relatively low level to account for impacts, or they need to be caveated where there are particular sensitivities.
- 4.15.5 In recent years, town centre densities have substantially exceeded the minimum set out in the existing policy. Urban densities have been delivered at the upper end of the range stated within the policy, while suburban density has occurred at exactly the mid-point of the range. Therefore, changes are proposed to increase town centre minimum densities substantially and also increase urban densities. It is proposed that indicative densities for suburban areas will remain largely the same, which is still an increase over existing densities.
- 4.15.6 Changes are also proposed to include a set of criteria for considering exceptions, as required by national policy. These include the presence of heritage assets, sensitive landscapes or townscapes, impacts on amenity and impacts on delivering the necessary mix of sizes of dwellings.
- 4.15.7 In terms of size and type, the existing policy H2 has not delivered the needed number of family homes of three or more bedrooms. This is difficult within Reading due to the emphasis on high density town centre sites, but changes are proposed to increase the proportion of family housing sought across the board in order ensure that sites in all locations make a contribution and that those outside the centre are genuinely family housing-led. Therefore, changes are proposed to increase the minimum proportion of 3- or more bed homes required on major sites outside the centre to 67% unless this is not achievable. The proposed policy also states that the number of 3- or more bed dwellings on sites of all sizes should be maximised and that a minimum percentage of 20% of 3- or more bed homes in district and local centres be applied. Policy CR6: Living in Central Reading also aims to increase the provision of family housing. Finally, the proposed policy explicitly states that where there is conflict between meeting indicative densities and delivery of family housing, the delivery of family housing will be prioritised.
- 4.15.8 With regard to self-build housing, changes are proposed to strengthen the policy, stating that major developments “should” make provision for self-build wherever viable, rather than “will consider.” Currently, the policy is not currently meeting the statutory duty to grant enough permissions to meet the level of need identified on its register. Securing new self-build homes within Reading is difficult because so much of the new-build development occurring is flatted, and in the most recent AMR the Council is failing its statutory duty to grant sufficient permissions (with a shortfall of 2

permissions), but proposed changes aim to increase the level of self-build permissions. This approach is preferred to stating a minimum proportion of self-build, for example 10%, as this would likely be difficult to achieve on many sites.

Policy Options

- 4.15.9 **H2(i)** – Minimum densities specified and subject to exemptions, increased proportion of 3+ bed dwellings, family housing to be prioritised, strengthened wording with regard to self-build – **PROPOSED OPTION**

This option would help to increase the number of family dwellings across the Borough, and particularly outside the centre. It would ensure that housing is being delivered at appropriate densities, especially in accessible locations, while considering specific sensitivities.

- 4.15.10 **H2(ii)** – Do not update indicative densities – **REJECTED**

This approach would fail to comply with national policy.

- 4.15.11 **H2(iii)** – Increase densities in line with average achieved – **REJECTED**

Increasing the minima would fail to take account of site-by-site circumstances and may result in negative effects to local character.

- 4.15.12 **H2(iv)** – 3+ bed dwellings req. remains at existing level – **REJECTED**

This approach would fail to address the need for family housing in full. It would continue the existing position which has resulted in delivery of family dwellings at a rate significantly below need.

- 4.15.13 **H2(v)** – Further increase provision of family accommodation outside the centre (up to 100%) – **REJECTED**

This may result in increased delivery of 3- or more bed dwellings, but it would be limited by the fewer number of sites occurring outside the town centre. This approach is also less flexible and may affect viability.

- 4.15.14 **H2(vi)** – Do not update wording in reference to self-build – **REJECTED**

This approach would continue to fail to meet the statutory duty to deliver sufficient self-build permissions.

- 4.15.14 **H2(vii)** – Specify minimum level of self-build dwellings (e.g. 10%) – **REJECTED**

This would likely lead to an over-provision of self-build dwellings and is likely to be difficult to achieve on very small sites.

4.16 H3: Affordable Housing

- 4.16.1 This policy aims to ensure that housing development delivers high levels of affordable housing, either on-site for larger sites or through financial contribution on smaller sites. Insufficient affordable housing can hamper economic growth and lead

to homelessness and households in unsuitable accommodation. Therefore, it is critical that all new residential development makes a contribution.

4.16.2 The HNA (EV011) has identified a critical need for affordable housing, approximately 406 additional affordable homes per year in Reading. This represents the majority of housing required. The NPPF states that affordable housing should not be sought from developments of 10 dwellings or less, but national policy cannot override local policies where there is evidence of exceptional need. The policy approach proposed continues to see affordable housing on sites of 10 dwellings or less and is supported by the Local Plan Viability Testing Report (EV004).

4.16.3 Representations to the Local Plan Partial Update have highlighted the fact that the affordable housing policy is contrary to government policy on the provision of affordable housing for sites of 10 or less dwellings. The Council has argued this point in many appeals and appeal decisions now consistently accept the Council's claim that local circumstances justify seeking such provision. While there are a small number of cases where the council's approach was not supported and for which there are good explanations, it is clear that inspectors have accepted the case and associated evidence demonstrating that circumstances in Reading should be treated as an exception to national policy. That remains the position, and the Council remains of the view that the policy needs to be retained in full.

4.16.4 The existing policy delegates the specific tenures of affordable housing sought to the Affordable Housing SPD. An updated Affordable Housing SPD (PP010) was adopted in 2021, which sets expectations as follows:

- Affordable rented accommodation at 'Reading affordable rent' levels¹⁴ to be at least 62% of the affordable housing provided; and
- Affordable home ownership (shared or other product) at a maximum of 38%.

Changes are proposed to the policy to incorporate these figures in order to give them full weight under policy and maximise clarity for applicants.

4.16.5 A Written Ministerial Statement (WMS) of 24th May 2021 introduced First Homes as a new affordable housing product. First homes are discounted homes for sale to first time buyers. The minimum discount must be at least 30%. The WMS stated that a minimum of 25% of on-site affordable units secured by Section 106 should be First Homes. It also stated that a minimum of 25% of off-site financial contributions secured should be used for providing First Homes.

4.16.6 The existing policy pre-dates the First Homes requirement and therefore is not compliant with national policy. The Council's strong view is that First Homes should not result in reducing the delivery of homes at "Reading Affordable Rent" levels, because this product best addresses the extensive need within the Borough. Therefore, the proposed policy requires that the 25% of First Homes are delivered as part of the 38% for affordable home ownership. The Council intends to apply a 30% discount for First Homes in order to avoid effects on viability that would reduce the overall number of affordable homes.

¹⁴ Reading affordable rent means rental levels capped at 70% of market rates.

- 4.16.7 The baseline eligibility requirement is that those eligible for first homes should have a combined household income below £80,000 but allows local authorities to set a lower income cap. It is not considered likely that Reading's first time buyer incomes will be lower than the national average. Therefore, the proposed policy does not seek to set a lower income cap.
- 4.16.8 As allowed under national guidance, the Council also intends to prioritise key workers and require a local connection test to ensure that the need being addressed is truly local. The Council does not intend to apply requirements with regard to employment status.
- 4.16.9 With regard to the timing of Affordable Housing contributions, the proposed policy seeks to reflect the Council's current practice of seeking deferred contributions as set out in the adopted Affordable Housing SPD (PP010). This allows for a deferred contribution mechanism to be included in S106 agreements to ensure that, if market conditions change that make a greater contribution viable, a proportion of increased profits are secured for affordable housing.
- 4.16.10 Where on-site provision cannot be made, such as when developers are unable to identify a Registered Provider (RP) to take on on-site affordable housing units (usually a small number) the units should be offered to the Council in the first instance and a financial contribution made as a last resort. The proposed policy seeks to incorporate this position.

Policy Options

- 4.16.11 **H3(i)** – Updates to tenure split, 25% First Homes with 30% discount, local connection test and priority for key workers, deferred contribution mechanism, cascade mechanism where no RP can be found – **PREFERRED OPTION**

This option will most effectively address the significant need for affordable housing within the Borough through a combination of different tenures in order to provide flexibility while still ensuring the highest level possible is secured. It prioritises key workers in order to support the local economy.

- 4.16.12 **H3(ii)** – Rely on Affordable Housing SPD, do not incorporate First Homes – **REJECTED**

By relying on the SPD, there is a risk that less weight is applied to these elements. It would also fail to comply with national policy because it does not include First Homes.

- 4.16.13 **H3(iii)** – Incorporate First Homes according to the approach suggested in national guidance – **REJECTED**

This would mean 25% First Homes, 47% Reading Affordable Rent and 28% other affordable home ownership. This would result in less than half of affordable housing meeting Reading's most pressing needs (for rented accommodation).

- 4.16.14 **H3(iv)** – Do not include First Homes within the specified tenure – **REJECTED**

This would not comply with national policy. It would require evidence that Reading is an exceptional case in terms of greater need for other affordable home ownership products than First Homes.

4.16.15 **H3(v)** – To include First Homes at a greater discount of 40 or 50% --
REJECTED

Although national guidance makes this possible, doing so is likely to significantly alter the viability of provision and lead to lower on-site delivery overall.

4.17 H4: Build to Rent Schemes

Key Considerations

- 4.17.1 Private renting (i.e. dwellings that are not rented from the Council or an RP) makes up around 32% (see Figure 10 of the HNA, EV011, July 2024) of the housing market in Reading. In the main, Private Rented Sector (PRS) housing is owned by small private landlords. It is a sector that has grown significantly in recent years with the growth in Buy to Let Investments. It has served growing markets such as the student sector, young professionals and those who cannot afford to buy market price housing in Reading. It also serves households who cannot afford to buy but who also cannot access public sector social and affordable housing, the stock of which has been significantly affected by sales of housing under the Right to Buy, the fall in grant funding for providing new housing in this sector, and other measures and regulations that have detrimentally affected investment in this sector.
- 4.17.2 The Council continues to see many applications for schemes designed specifically for purpose-built private rented developments held in single ownership. This policy provides the basis for determining these schemes and for securing Affordable Private Rent as a form of affordable housing. Build to rent will continue to play an important role in housing development in Reading and the existing policy has successfully secured a mix of units, secure tenancies, high design standards, and affordable housing.
- 4.17.3 As one of the main benefits of build to rent is the security of tenure, the existing policy requires minimum three-year tenancies with a six-month break clause in the tenant's favour. The Council would like to increase security of tenure even further, by proposing that tenancies are able to be rolled forward for a further three-year tenancy period. This would be secured by S106 agreement.

Policy Options

- 4.17.4 **H4(i)** – amendment to state that a further three-year tenancy be offered at the end of the tenancy to increase security – **PROPOSED OPTION**

This option will continue to deliver the benefits of the existing policy while increasing security for tenants.

- 4.17.5 **H4(ii)** – Do not update the policy – **REJECTED**

While this option would continue to operate reasonably well, it would miss an opportunity to maximise security of tenure.

4.18 H5: Standards for New Housing

Key Considerations

- 4.18.1 The NPPF states that the planning system should “support the transition to a low carbon future [...] and shape places in ways that contribute to radical reductions in greenhouse gas emissions” (paragraph 152). It also states that “the needs of groups with specific housing requirements are addressed (paragraph 60).”
- 4.18.2 In 2015, the Government introduced new additional optional Building Regulations on water and access and a new national space standard. These are applied in the existing policy and are proposed to remain in place and have been successfully implemented without affecting viability in recent years.

Water Efficiency

- 4.18.3 In terms of water efficiency, there remains clear evidence from the Environment Agency that the Thames River Basin is a water-stressed area. Given this, the highest possible standards are proposed to continue to be applied in order to meet demand management aims. It is considered that this is best achieved through a fittings approach as recommended by liaison with Thames Water and opting-in to the optional standards within the Building Regulations (110 L/person/day). The Environment Agency and Thames Water have supported the Council’s stance throughout consultation.

Nationally Described Space Standard

- 4.18.4 With regard to the nationally described space standard, this is proposed to continue to apply to all new-build housing outside the town centre. Sufficient internal space is critical for the wellbeing of residents, but in the centre this may not always be possible. It can be seen that in a majority of cases, development outside the centre meets the space standards. This is true across a range of densities. Therefore, it is clear that there is no fundamental issue in continuing the current policy approach in this regard.

Accessibility and Adaptability

- 4.18.5 The current policy applies two separate standards under part M4(2) and M4(3) of the Building Regulations which states that “Local authorities should identify the proportion of dwellings in new developments to comply with these categories based on the likely future need for older and disabled people, while taking account of viability.”
- 4.18.6 The HNA (EV011) identifies that the need for wheelchair adapted housing is likely to increase by 730 over the 18-year plan period due to an increasing number of households with members over age 75. It states: “In market housing, the evidence supports at least 4% of all market housing being fully (and simply) adaptable to the needs of a wheelchair occupant. However, since the Council cannot allocate market wheelchair homes, it is likely that some of these dwellings may be occupied by households that do not contain a wheelchair user. To avoid there being insufficient market homes that are fully wheelchair adaptable to meet the needs of the wheelchair using population, it is reasonable to plan for a higher proportion of fully

wheelchair adaptable homes, (e.g. 10%), subject to viability and similar constraints.” Therefore, the proposed policy increases the level of dwellings for wheelchair users in line with M4(3) on developments of 20 or more dwellings to at least 10%.

- 4.18.7 The proposed policy continues the existing requirement for all new build housing to be accessible and adaptable in line with M4(2). The requirements of M4(2) are a relatively simple set of design measures to enable dwellings to be adapted over time as the needs of residents change and the cost for developers is estimated to be very low.

Energy Efficiency

- 4.18.8 Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. Under the Climate Change Act 2008, the UK has committed to legally binding greenhouse gas emission reduction targets of at least 34% by 2020 and at least 80% by 2050. The Council has declared a climate emergency with an ambitious target of achieving net zero emissions by 2030. The sustainable design and construction requirements of the Local Plan Partial Update are a critical tool used to drastically reduce the emissions of development within the Borough and to avoid the need for costly retrofitting in the future.
- 4.18.9 The existing policy approach has provided an effective tool and employs requirements exceeding the Building Regulations, resulting in a large proportion of all development being built to a net zero carbon standard as defined in the 2019 Local Plan. From 1st April 2023 to March 31st 2024, 100% of major new-build residential developments were permitted at the existing zero carbon homes standard (2024 Annual Monitoring Report, PP008). This suggests that the existing policy approach does not present an undue burden and that there may be scope to increase standards further.
- 4.18.10 The Government has announced its intention for all new build homes to be highly energy-efficient and zero carbon ready through updates to the Building Regulations. However, the existing interim standards fail to meet industry best practice for building performance and do not address the energy performance gap (whereby as-built units assessed under the Standard Assessment Procedure (SAP) do not meet the standards approved at application stage). Moreover, “zero carbon ready” as defined in the Building Regulations relies on the full decarbonisation of the electricity grid, which is not expected to occur for many years. Therefore, it is considered appropriate that the Council continue to apply stringent energy efficiency standards exceeding those of the Building Regulations and in line with industry best practice. Industry best practice no longer relies on SAP assessment but rather measuring total energy use and total space heating demand to encourage a fabric first approach which reduces overall energy use. Energy metrics are seen to be more technically robust and lead to better building outcomes, while the standards prescribed in the Building Regulations simply represent the legally allowable poorest values.
- 4.18.11 The Council is aware of objections to this approach citing the restrictions set out in a Written Ministerial Statement (WMS) published 13 December 2023 which states the Government’s decision to restrict the ability of local authorities to set

energy performance standards other than through the limited approach of a Target Emissions Rate (TER) measured through SAP. This WMS ignores the fact that many Local Authorities have been working collaboratively to establish consistent policies relying on absolute energy metrics based on the advice of LETI. This approach has been accepted by Planning Inspectors and forms the adopted policies of various local authorities, such as Bath and North East Somerset, Cornwall and Central Lincolnshire. The WMS also fails to recognise the primacy of local authorities' powers under the Climate Change Act 2008 to reduce greenhouse gas emissions. Until such time that the Building Regulations achieve truly net zero buildings, the Council intends to adopt policies exceeding the requirements of the Building Regulations.

- 4.18.13 The proposed policy aims to achieve zero carbon homes where viable. The Local Plan Viability Testing Report (Nov 2024, EV004) includes discussion of costs associated with compliance. It has not been found to have an adverse effect on overall development viability. Nonetheless, an exceptional basis clause is proposed in order to ensure that the requirements do not prevent development from coming forward due to viability concerns or present an undue burden for developers. The exceptional basis clause may result in financial contributions where requirements cannot be achieved on-site. Any financial contribution will be calculated on a case-by-case basis within the limits per dwelling stated within the policy. To provide flexibility, applicants can also demonstrate the proposal is compliant with an accredited third-party assessor, such as Passivhaus Plus or Passivhaus Premium.

Policy Options

- 4.18.15 **H5(i)** – Net zero carbon homes with specific limits for space heating demand and total energy use, specific requirements with regard to water efficiency, accessibility and adaptability – **PROPOSED OPTION**

This option would deliver net zero dwellings and help meet Reading's 2030 net zero target.

- 4.18.16 **H5(ii)** – Do not update the policy – **REJECTED**

This option would result in dwellings that are not truly zero carbon and would not require on-site renewables to match total energy use. This may create the need for retrofit in the future.

- 4.18.17 **H5(ii)** – Omit policy and rely on forthcoming updates to the Building Regulations – **REJECTED**

This option would create uncertainty for applicants and fail to address the urgency of reducing emissions within the Borough. Moreover, the proposed changes to the Building Regulations are unlikely to result in net zero emissions as they rely on the decarbonisation of the grid.

- 4.18.18 **H5(ii)** – Update the policy, but with less ambitious requirements for TER – **REJECTED**

This would improve standards but is unlikely to result in a drastic reduction or eventual elimination of emissions within the Borough.

4.19 H6: Accommodation for Vulnerable People

Key Considerations

- 4.19.1 Since the adoption of the 2019 Local Plan, national policy has been strengthened to emphasise the importance of providing accommodation for older people and Reading, like many other areas, has an ageing population. The HNA (EV011) assesses the needs of particular groups requiring housing, including vulnerable people, older people and people with disabilities. Changes to the policy are proposed to update the level of need identified.
- 4.19.2 As there has been substantial provision of extra care housing in recent years, there is now considered to be an over-supply and there is no identified need for further extra care at this time. However, some existing facilities are in need of replacement as they no longer meet modern standards of care.
- 4.19.3 Changes are proposed to increase the age of eligibility from 55 to 65. Although there are certainly some individuals in need of care at age 55 and it is appropriate that these needs are met, the age threshold is considered relatively low. This may result in residential developments that simply act to exclude younger people and fail to establish a mixed community. Therefore, the change proposed states that ages of eligibility below 65 will need to be robustly justified.
- 4.19.4 Changes are also proposed to highlight that the large majority of need for specialist older person housing units (other than residential care) is for affordable units.

Policy Options

- 4.19.5 **H6(i)** – Changes proposed to increase the age requirement and state the need for affordable units as well as update the level of need on HNA findings – **PROPOSED OPTION**

This option will help to address the growing need for accommodation for vulnerable people, particular older persons in light of Reading's aging population. It will also prevent age restrictions lower than 65 which may fail to create mixed communities.

- 4.19.6 **H6(ii)** –Do not change policy – **REJECTED**

This would fail to properly address the growing need, particularly in light of Reading's aging population. It may also unfairly exclude younger residents due to a relatively low age threshold.

- 4.19.7 **H6(iii)** – Move to a criteria-based policy without identifying specific needs – **REJECTED**

This would not be compliant with national policy as it would fail to meet the housing needs of specific groups.

4.20 H7: Protecting the Existing Housing Stock

Key Considerations

- 4.20.1 This policy aims to ensure that existing housing stock is not lost as a result of development in a way that would result in a net loss of homes. The cumulative effect of individual proposals that result in a net loss could have a significant negative effect on housing. Therefore, this policy continues to provide an important tool.
- 4.20.2 However, in some circumstances this policy has not been sufficiently flexible. For instance, a proposal to convert two existing flats into a large family home would increase family-sized accommodation but also result in a net loss. This presents a conflict with the aims of other housing policies. In order to ensure specific flexibility, changes are proposed to allow the consideration of exceptional circumstances.

Policy Options

- 4.20.3 **H7(i)** – Change proposed to ensure that applies exceptional circumstances to the entire policy – **PROPOSED OPTION**

This option will ensure that exceptional circumstances will be considered in order to allow creation of a new family dwelling, where appropriate.

- 4.20.4 **H7(ii)** – Do not change policy – **REJECTED**

This option would conflict with other housing policies to encourage family housing and may prevent such units from coming forward.

4.21 H8: Residential Conversions

Key Considerations

- 4.21.1 This policy sets out criteria for considering conversions from houses to flats or to houses in multiple occupation (HMOs). Residential conversions play an important role in housing supply in Reading, but conversions can result in adverse effects. Proposed changes to the policy seek to address issues that have arisen during implementation, particularly to clarify how the threshold approach should be applied.
- 4.21.2 Since the adoption of the 2019 Local Plan, a new Residential Conversions SPD (March 2023, PP011) was adopted which addresses many of these issues. Therefore, changes are proposed to bring the main points from the SPD into the updated policy. The SPD discusses the evidence-based formulation of the threshold approach and therefore, it is not considered necessary to repeat here.
- 4.21.3 In addition to incorporating elements of the SPD, other changes are proposed which clarify that within applications:
- Residential dwellings sandwiched between two HMO's should be avoided;
 - Bathrooms should not be located above habitable rooms; and
 - The loss of family accommodation cannot be mitigated through the provision of a dwelling within the development unless it has three bedrooms or as many bedrooms as the existing dwelling, whichever is lesser.

Policy Options

- 4.21.4 **H8(i)** – Changes to incorporate elements of the SPD, consideration of sandwiching, stacking and protection against loss of family housing – **PROPOSED OPTION**

This option will address issues that have arisen during implementation and ensure that principles in the SPD are given full weight.

- 4.21.5 **H8(ii)** – Rely on the SPD, do not update policy – **REJECTED**

This would miss an opportunity to give principles in the SPD full weight.

- 4.21.5 **H8(iii)** – Apply the same threshold approach outside Article 4 direction areas – **REJECTED**

Although this would create consistency, it would not address the fact that there tend to be more conversions to flats outside the Article 4 areas.

- 4.21.5 **H8(iv)** – Apply a lower threshold outside Article 4 direction areas – **REJECTED**

This would create a more restrictive policy outside the areas where there is most concern about negative effects and may unduly restrict conversions.

- 4.21.6 **H8(v)** – Criteria based approach outside the Article 4 direction areas -- **REJECTED**

This is likely to create a sense of uncertainty for applicants as to whether a proposal for conversion is likely to be acceptable.

4.22 H14: Renewal and Regeneration of Residential Areas

- 4.22.1 This policy sets out the aims and expectations for developments relating to renewal and regeneration of Reading's residential areas. Reading has a number of older housing estates, many of which are still primarily within the Council's ownership. Proposed changes relate to the inclusion of updated information regarding specific opportunities, and a rewording of the title of the policy itself. The policy is also proposed to identify that renewal and regeneration projects present an opportunity to deliver a net gain of around 400 homes over the plan period.

- 4.22.2 The Council's Housing Strategy 2020-2025 identifies that, in terms of residents of Council-owned housing estates, although there is satisfaction with the quality of homes, improvements to wider neighbourhoods are required. This accords with the policy ambition in H14 to improve the local built environment.

Policy Options

- 4.22.3 **H14(i)** – Amendment of the policy name, identifying specific opportunities for suburban renewal and regeneration to be identified once the work has been undertaken – **PROPOSED OPTION**

The proposed amended wording of the policy will avoid confusion with use of the term 'suburban' in other parts of the Local Plan, especially as the intent of this policy is broader than the definition of the term 'suburban'. This option will bring the policy up to date with changes on the ground and recent work within the Council to determine opportunities for estate regeneration within the Borough.

4.22.4 **H14(ii)** – Proposals for renewal and regeneration of Reading’s suburban residential areas but no specific locations identified – **REJECTED**

This would miss an opportunity to identify specific locations and may make it more difficult for schemes to come forward because the approach is too broad.

4.22.5 **H14(iii)** – To identify detailed proposals for areas including housing provision figures – **REJECTED**

Although this would highlight aims to deliver a net increase in dwellings, particularly affordable housing, this approach may be overly specific at an early stage.

4.23 **H15: Purpose-Built Shared Living Accommodation**

4.23.1 This is a new proposed policy which is required due to anticipated planning applications for ‘co-living’ proposals, which requires set criteria in place to adequately assess proposals against. This type of housing differs from self-contained housing or HMOs, for example, due 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.

4.23.2 Due to the specific requirements which will arise from the anticipated proposals, a specific standalone policy is required to ensure those requirements are properly assessed.

4.23.3 The inclusion of this policy was generally supported by individuals and planning agents/landowners within the Local Plan Partial Update consultation on the Scope and Content (Regulation 18).

Policy Options

4.23.4 **H15(i)** – No policy – **REJECTED**

Not creating a specific policy which addresses ‘co-living’ schemes would fail to respond to the emerging new type of accommodation which is not adequately covered within any other existing policy. It would be a missed opportunity to set out locally relevant requirements to ensure appropriate assessment of such proposals.

4.23.5 **H15(ii)** – Create a new policy – **PROPOSED OPTION**

This would ensure the Local Plan will respond positively to diversifying trends in residential accommodation and allow anticipated future planning applications to be assessed against specific requirements that ensure ‘co-living’ schemes respond positively to the locally identified needs and requirements.

4.23.6 **H15(iii)** – Criteria-based policy to omit any preference in terms of location – **REJECTED**

Although this option could address the specific requirements for the assessment of such schemes, it could have a negative effect on the overall delivery of housing in

the borough due to increased pressure and competition with other much needed and scarce sites in the borough, hence the need to identify appropriate locations for such development.

4.23.7 H15(iv) – Negative approach to discourage co-living proposals – PROPOSED OPTION

This would be a missed opportunity to respond to the diversifying trends in residential accommodation and would limit the flexibility of housing opportunities for younger people in particular.

4.23.8 H15(v) – Positive approach to encourage co-living proposals – REJECTED

This option risks an over-provision of ‘co-living’ schemes and competition of limited developable land in the borough.

4.24 TR1: Achieving the Transport Strategy

4.24.1 This policy aims to ensure that developments meet the objectives of the transport strategy and contribute towards sustainable transport measures. The Local Transport Plan 2040 (LTP4) was adopted in 2024. It contains a range of objectives and policies which are of fundamental importance to this policy. As such, the policy is proposed to be brought up to date in response to this.

Policy Options

4.24.2 TR1(i) – Incorporate new objectives from the latest Transport Strategy – PROPOSED OPTION

This will bring the policy up-to-date and ensure that references to healthy streets, smart solutions and cross-references to the climate emergency are incorporated.

4.24.3 TR1(ii) – No change to the existing policy – REJECTED

This would result in an out-of-date policy that could negatively impact its efficiency and relevance.

4.25 TR2: Major Transport Projects

4.25.1 This policy identifies the major transport projects from the Local Transport Plan and prioritises their implementation. The Reading Transport Strategy 2040 (LTP4) was adopted in 2024. This contains a range of schemes and initiatives that differ in part from the previous Local Transport Plan and therefore this policy, meaning that the contents of LTP4 will need to be reflected in an update to this policy.

4.25.2 Some of the major transport schemes listed in the policy have been delivered, and there is now no need to refer to, or (where applicable) safeguard land for them. These schemes include:

- Cow Lane Bridges (completed in April 2019);
- Green Park Station and Interchange (completed and opened in May 2023);
- The elements of the National Cycle Network Route 422 were (completed in 2020).

- 4.25.3 The stretch of the M4 Smart Motorway within Reading Borough, referred to in the supporting text, opened in December 2021. Reference to this can be removed from the plan.
- 4.25.4 In terms of safeguarding for Crossrail, Elizabeth Line services began running to Reading in 2022. There is not known to be any further need for the land in Reading covered by the safeguarding direction to be used.

Policy Options

- 4.25.5 **TR2(i)** – Update the list of completed projects and add new projects to the policy – **PROPOSED OPTION**

This will bring the policy up-to-date and support the delivery of forthcoming transport projects within the borough.

- 4.25.6 **TR2(ii)** – No change to the existing policy – **REJECTED**

This would result in an out-of-date policy that could negatively impact its efficiency and relevance.

4.26 TR4: Cycle Routes and Facilities

- 4.26.1 This policy aims to ensure that opportunities are taken to improve cycling access, and identifies cycle routes that should be maintained, enhanced or extended; linking to the most recent Cycling Strategy. Although the 2012 version of the NPPF did support the promotion of cycling (and walking), this has been substantially strengthened in the December 2023 version. The 2021 version recognises the importance of building walking and cycling into design to creating healthy communities. It also contains a clear statement that plans should “provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans)”. For planning applications, the NPPF 2023 (paragraph 112) now also prioritises movement for pedestrians and cyclists over access to high quality public transport.
- 4.26.2 The Local Cycling and Walking Infrastructure Plan (LCWIP) was published in March 2020 and was developed in partnership with Wokingham Borough Council and West Berkshire District Council. The LCWIP forms a sub-strategy to the transport strategy aiming to help deliver plans to increase walking and cycling usage. The LCWIP identifies a network of cycle routes, with five particular categories: town centre routes, strategic routes, orbital routes, local routes and leisure routes. Each of these categories has different measures associated with it and is geared towards different levels of cyclists. This network extends across the whole Reading urban area including areas outside Reading Borough. The network differs significantly from the identified network on the Proposals Map derived from the previous Cycling Strategy. Although TR4 allows for changes to the specific routes identified, there is still a need to update the policy to reflect the different measures included within the LCWIP.

Policy Options

- 4.26.3 **TR4(i)** – Update the Proposals Map to show the cycle network from the LCWIP, policy updated to outline different requirements for the five types of cycle routes and cross-referencing to LCWIP and any successor document – **PROPOSED OPTION**

This will bring the policy up-to-date and support the design and delivery of cycle routes and facilities projects within the borough.

- 4.26.4 **TR4(ii)** – No change to the existing policy – **REJECTED**

This would result in an out-of-date policy that could negatively impact its efficiency and relevance.

4.27 TR5: Car and Cycles Parking and Electric Vehicle Charging

- 4.27.1 This policy aims to ensure that car and cycle parking appropriate to the level of accessibility of the site is provided as part of new developments and that electric vehicle (EV) charging is provided for specified developments. The 2023 NPPF includes a statement that maximum parking standards should only be set in specific circumstances, namely where there is a “clear and compelling justification” in terms of managing the local road network or optimising density in accessible locations. Although the policy wording itself is not expressed in terms of maximum standards, it does rely on an SPD which is based on such standards. As such, this will need to be considered as part of an update.

- 4.27.2 Another change is that the NPPF now discusses the importance of ensuring adequate spaces for charging and ultra low-emission vehicles. Although this is covered in the existing policy, the continued take-up of such vehicles requires an update to the policy.

- 4.27.3 In addition, the NPPF now talks about the importance of providing adequate overnight lorry parking facilities, something that is not currently addressed in the Local Plan.

- 4.27.4 The Reading Transport Strategy 2040 (LTP4) was adopted in 2024. It will need to cover ultra low-emission vehicles alongside other modes of sustainable transport, and as such its content will need to be reflected in updates to this policy.

Policy Options

- 4.27.5 **TR5(i)** – Remove residential EV requirements, increase non-residential EV provision to 20%, introduce the presumption in favour for charging infrastructure – **PROPOSED OPTION**

This will bring the policy up-to-date and support the design and delivery of cycle routes and facilities projects within the borough.

- 4.27.6 **TR5(ii)** – No additional EV charging contributions – **REJECTED**

This could result in an insufficient supply of EV charging points, in particular for businesses and local services, making mobility in Reading more challenging.

4.27.7 **TR5(iii)** – Seek a higher proportion of non-residential parking to include charging points – **REJECTED**

This could result in difficulty achieving viability/deliverability on non-residential development sites.

4.28 **RL2: Scale and Location of Retail, Leisure and Culture Development**

4.28.1 This policy aims to identify the amount of retail, leisure and culture development that will be planned for and sets out the approach to where this development should be located. There is a need to reassess needs for retail and leisure development to take account of changes to shopping patterns, and in particular, to take the impact of Covid-19 into account.

4.28.2 The Commercial Development Needs Assessment (CDNA) (EV006-EV009), which was completed in 2024 found that, within the borough there was :

- An overprovision of 5,467 sq m of comparison goods floorspace up to 2041;
- A small positive need of 428 sq m of convenience goods floorspace by 2041;
- No positive overall need for retail floorspace; and
- No need for any specific facilities.

4.28.3 Monitoring data also shows a net loss of retail floorspace compared to the gain that the policy seeks, which requires the policy to be updated.

Policy Options

4.28.4 **RL2(i)** – Update needs according to the most up-to-date information – **PROPOSED OPTION**

This will bring the policy up-to-date and support the provision of retail space in Reading.

4.28.5 **RL2(ii)** – No update to policy – **REJECTED**

This could result in an under provision of retail space.

4.29 **RL3: Vitality and Viability of Smaller Centres**

4.29.1 This policy aims to manage the uses within the identified district and local centres, and in particular, ensure that retail, financial and professional uses do not fall below a certain level, that takeaways do not over-concentrate, that there would be no ground floor loss of town centre uses, and that additional town centre uses are provided where possible.

4.29.2 On 1st September 2020, changes to the Use Classes Order came into force. This had significant implications for use classes within centres. In particular, a number of formerly separate use classes were combined within a new Use Class E (Commercial, Business and Service). This includes shops (formerly A1), financial and professional services (A2), restaurants and cafes (formerly A3), offices, light industrial and research and development (formerly B1) as well as a number of

community and leisure uses formerly within the D1 and D2 use classes. Changes of use within a single use class are not classed as development, and do not therefore require planning permission. In addition, drinking establishments (formerly A4) and hot food takeaways (formerly A5) are now classed as sui generis uses.

4.29.3 These changes substantially affect policy RL3, which makes specific reference to some of these use classes. In the case of the reference to A5 takeaways in criterion b), the updates required would be simply to change the reference, as the need for planning permission is not affected. However, in the case of the approach to A1 and A2, the changes are much more significant. The policy can no longer effectively retain those uses, because they could change to a wide range of other uses, including some such as office and light industrial that are not considered 'centre uses' at all according to the list in paragraph 4.6.16, without requiring planning permission. There is no scope to control such changes through an Article 4 direction, because those changes are not classed as development. Therefore, large parts of this policy can no longer be implemented, and an update is required.

4.29.4 Changes to the General Permitted Development Order (GPDO) have also been made since adoption of the plan, to extend permitted development rights. In particular, the new permitted development right to convert class E uses to residential that came into force on 1st August 2021 has potential implications for policy RL3. It allows for much more scope for conversion of ground floor town centre uses than previously existed, by, for instance:

- Expanding the right to uses not formerly affected such as restaurants and cafes and medical facilities;
- Raising the size threshold that previously applied to retail and financial and professional uses from 150 sq m to 1,500 sq m; and
- Removing safeguards in the conditions such as around the sustainability of the shopping area.

4.29.5 These changes therefore also potentially significantly impact the application of this policy, because many changes of 'centre uses' to 'non-centre uses' controlled by criterion b) would now be permitted development.

Policy Options

4.29.6 **RL3(i)** – Update policy to reflect new use classes and Article 4 Direction – **PROPOSED OPTION**

This will bring the policy up-to-date and support the provision of retail space in Reading.

4.29.7 **RL3(ii)** – No update to policy – **REJECTED**

This option would fail to refer to the most up-to-date guidance and may result in inappropriate development.

4.29.8 **RL3(iii)** – Seek to retain a minimum proportion of use class E – **REJECTED**

Use class E as amended is sufficiently broad that most town-centre uses are now included within this use class and therefore this option is not considered an effective way to deliver the aims of this policy.

4.30 RL4: Betting Shops and Payday Loan Companies

- 4.30.1 This policy aims to prevent clustering of betting shops and payday loan shops. The policy as existing does not include adult gaming establishments. Reading has seen an increase in adult gaming establishments and has seen the negative effects of clustering of such establishments within the Central Core.
- 4.30.2 The threshold within Policy RL4 was established within the evidence base for the 2019 Local Plan. The proposed changes do not introduce a new threshold but rather propose to include gaming establishments as these uses have the potential to bring negative effects in similar ways to betting shops and payday loan companies.

Policy Options

- 4.30.3 **RL4(i)** – Extend policy to cover all gaming establishments and clarification that where there are already three establishments within 150 sq m no further increase will be permitted – **PROPOSED OPTION**

This will help to prevent the negative effects of proliferation of gaming establishments and support other retail uses within the town.

- 4.30.3 **RL4(ii)** – No update to policy – **REJECTED**

This option would allow for adult gaming centres to continue to proliferate in areas where such uses are concentrated and bring negative effects to the town.

- 4.30.4 **RL4(iii)** – Set an alternative threshold – **REJECTED**

The existing threshold has been effective in striking a balance between preventing negative effects while still allowing for these uses to occur within the town.

4.31 OU2: Hazardous Installations

- 4.31.1 This policy aims to ensure that proposals that would involve hazardous substances, or development in the vicinity of hazardous sites, would not pose adverse health and safety risks. There has been a significant change in the legislation around sites that handle radioactive material in the form of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPIR 2019). These changes had implications for development in the vicinity of the Atomic Weapons Establishment (AWE) Burghfield, which sits in West Berkshire just over 1.5 km from the boundary with Reading.
- 4.31.2 These changes did not result in any changes to operations on the site, but instead changed how risk is taken into account. As a result, the Detailed Emergency Planning Zone (DEPZ) around AWE Burghfield was significantly extended, and it now includes areas within Reading west of the A33 and south of the Kennet and Avon Canal. Within that area, the key consideration is whether any new development can be accommodated within the Off-Site Emergency Plan. This presents a

substantial constraint on new development in the DEPZ, particularly residential development.

Policy Options

- 4.31.3 **OU2(i)** – Additional clause to make specific reference to development within the revised DEPZ, new boundary added to Proposals Map, supporting text updated with regards to AWE Burghfield – **PROPOSED OPTION**

This will bring the policy up-to-date and prevent inappropriate development within the revised DEPZ.

- 4.31.4 **OU2(ii)** – No update to policy – **REJECTED**

This option would fail to refer to the most up-to-date guidance and may result in inappropriate development.

4.32 OU3: Telecommunications Development

- 4.32.1 This policy aims to set out criteria for assessing proposals for telecommunications development. The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022 came into force on 4th April 2022. This made a number of changes to permitted development rights related to development for telecommunications.
- 4.32.2 There have been some subtle changes to national policy on telecommunications infrastructure that would need to be considered as part of any update. The 2021 NPPF makes specific reference to 5G technology as well as technology necessary for the roll-out of smart cities, and states that planning policies should support the expansion of electronic communications networks. In addition, the 2023 NPPF states that, when considering the need to keep masts to a minimum, this should take into account “providing reasonable capacity for future expansion”, which is not referred to in the 2012 version.
- 4.32.3 The Thames Valley Berkshire Recovery and Renewal Plan, published in 2020, strongly emphasises the importance of digital connectivity in long term renewal of the area. Whilst not all of this will be provided by development which falls within this policy, it nonetheless underlines the need for further telecommunications development.
- 4.32.4 Lastly, roll-out of 5G telecommunications infrastructure has begun in Reading since the Local Plan was adopted. Masts and infrastructure tend to be larger and more conspicuous, and there are new requirements in terms of location of infrastructure. This has represented a particular challenge in Reading, with many proposals having been refused due to the impacts of these proposals on the local area. Although many of the general principles in policy OU3 are likely to continue to be important, there is nevertheless a need to incorporate this into any update of the policy.

Policy Options

- 4.32.5 **OU3(i)** – Remove references to outdated technology, strengthen requirement for careful siting and design of masts – **PROPOSED OPTION**

This will bring the policy up-to-date and express the Council's requirement for careful siting and design to ensure there is no adverse impact on amenity, heritage, trees and highways safety.

4.32.6 **OU3(ii)** – No update to policy – **REJECTED**

This option would be a missed opportunity to strengthen this policy and bring the wording up to date.

4.33 **CR2: Design in Central Reading**

4.33.1 This policy aims to set out additional policy requirements further to policy CC7 regarding design in Central Reading. There have been significant changes to national policy relating to design, including the introduction of design codes and the publication of the National Design Guide and the National Model Design Code. These are examined in detail in relation to policy CC7. Policy CR2 is not a comprehensive design policy for the centre, instead reflecting on some specific elements that are of particular relevance for the centre. Nonetheless, if CC7 is to be part of an update as a result of these changes, it makes sense for CR2 to also be incorporated into this update.

4.33.2 This policy was relevant to two appeal decisions since the plan was adopted. One decision had particular implications for policy CR2. One part of the decision focused on the use of the term 'existing grid' and therefore the fact that the existing grid shows considerable fragmentation from the original grid was of relevance. The intention of the policy is to reinstate the grid where possible, and therefore the wording 'existing grid' does not entirely accord with what the policy is trying to achieve, which should be addressed in an update.

4.33.3 The same decision highlighted another issue where the conditions of the site meant that two important aspects of town centre policy – provision of active frontages and providing a direct north-south link from the station – were in conflict. An update to the policy could make clear how these instances should be dealt with.

Policy Options

4.33.5 **CR2(i)** – Re-establish an urban grid, add reference to designing biodiversity net gain, clarify how conflict should be dealt with – **PROPOSED OPTION**

This updated wording will clarify the aims behind this policy and resolve the confusion arising from the existing wording. It will also align this policy with the significant changes to policy EN12 (Biodiversity) and the relevant national legislation. Clarifying how conflicts are dealt with will allow planning officers to consider which elements will bring the greatest public benefit where it is not possible to achieve all points of the policy.

4.33.6 **CR2(ii)** – No update to policy – **REJECTED**

This option would be a missed opportunity to strengthen this policy and clarify conflicting matters raised in a previous appeal decision.

4.34 CR6: Living in Central Reading

- 4.34.1 This policy aims to deal with specific matters that affect residential proposals in the centre of Reading, including the mix of unit sizes, noise and air quality issues, specific requirements for affordable housing tenure and the issue of serviced apartments. There has been an increasing emphasis in the NPPF on delivering homes at higher densities within locations which are particularly accessible by public transport. The 2023 NPPF highlights an expectation that there will be minimum densities for city and town centres and other locations that are well-served by public transport, and that these should seek a significant uplift in the average density of residential development. Although policy CR6 does not currently deal with density, an increase in town centre densities will bring additional considerations that should be reflected in an update to policy CR6.
- 4.34.2 In general the delivery of larger 3-bed homes has not been too far away from the policy targets in CR6. However, there are significantly higher levels of 1-bed accommodation being delivered compared to the CR6 policy targets. Much of this may be down to residential prior approvals which are not required to comply with those targets and tend to be dominated by studio or 1-bed dwellings. The Article 4 direction now in place may mean that the delivery profile of town centre accommodation may be brought more into line with what is sought by CR6.
- 4.34.3 However, monitoring data set out in relation to policy H2 demonstrates the degree to which the delivery of housing across the Borough has failed to reflect the needs for larger dwellings of 3 or more bedrooms. This is still true and H2 is proposed to be updated accordingly

Policy Options

- 4.34.4 **CR6(i)** – Increase the minimum proportion of family homes of three or more bedrooms expected on town centre sites from 5% to 15% – **PROPOSED OPTION**

The 15% figure attempts to strike a balance in delivering the supply of 3+ bed units without affective viability/deliverability of sites

- 4.34.5 **CR6(ii)** – Developments of 15+ homes to include 5% of dwellings at three or more bedrooms – **REJECTED**

This option would fail to meet the demand over the plan period.

- 4.34.6 **CR6(iii)** – Increase the minimum proportion of three-bedroom homes to 20% – **REJECTED**

This option would present potential viability/deliverability issues on sites within Central Reading.

4.35 CR7: Primary Frontages in Central Reading

- 4.35.1 This policy aims to ensure that the main shopping frontages across Central Reading provide active users with a shopfront, and that a proportion of retail or financial and professional use is retain within each frontage. On 1st September 2020, changes to the Use Classes Order came into force that were particularly relevant to town centre

uses, in particular the establishment of a new use class E (commercial, business and service). This is explored fully in relation to policy RL3 (see section 4.29), and the implications for CR7 of the removal of the A1 and A2 use classes and replacement by a wider E use class will be similar to RL3. An update is therefore required.

Policy Options

- 4.35.5 **CR7(i)** – Update the policy to comply with updates to the Use Class Order, with corresponding changes to the existing and proposed frontages within the Proposals Map – **PROPOSED OPTION**

This option will allow the policy to be applied under recent changes to the Use Class Order.

- 4.35.6 **CR7(ii)** – No update to policy – **REJECTED**

This option would make application of the policy difficult as it would continue to refer to former and outdated use classes.

- 4.35.7 **CR7(iii)** – Retain a minimum proportion of Use Class E – **REJECTED**

This option would have little effect in practice given that uses under Use Class E are now very wide-ranging.

4.36 CR10: Tall Buildings

- 4.36.1 This policy aims to set out comprehensive approach to tall buildings in Reading. It identifies three clusters where tall buildings may be appropriate; outside of which tall buildings will not be appropriate. While this policy was not initially included in the list of policies to be updated, there was a general demand from developers/landowners to review this policy, due to increasing emphasis on increasing densities within town and city centres.

- 4.36.2 The Local Plan Partial Update is supported by a Tall Buildings Strategy (TBS) Update Note (2025) (EV024) which, among other matters, provides an update on the identified permissions and completions for tall buildings since the original Tall Buildings Strategy. The following represents the updated position in March 2025:

- Although planning policy documents have changed, the overall approach of local and national policy remains broadly equivalent;
- One major contextual change is the approach to housing needs and maximising density in major town centres, however, tall buildings are far from the only way of delivering high density development;
- A number of new tall buildings have been constructed or are planned, and as a result Reading has physically changed substantially in places. However, all of these are in areas that the TBS considered appropriate locations for tall buildings, and many were planned in some form or another at the time of the TBS;
- Analysis of the various sub-areas of the centre for their townscape character has concluded that the same areas still have potential for tall buildings;

- There have been some changes to matters such as flood risk and sustainable travel across the centre, which particularly serve to emphasise the suitability of areas around the station;
- The sensitivity of key views remains largely as originally assessed, other than in three cases.

Policy Options

- 4.36.3 **CR10(i)** – Amend wording to identify ‘areas of less suitability for tall buildings’ and specify that tall buildings will not be permitted outside the three identified clusters and areas of less suitability – **PROPOSED OPTION**

This will bring the policy up to date with the TBS Update Note (2025) and provide more flexibility for high density developments in appropriate areas, while ensuring that the character of the identified locations is enhanced.

- 4.36.4 **CR10(ii)** – No update to policy – **REJECTED**

This option would be a missed opportunity to respond to the changing character of Reading, and the pressures faced from the need to provide more housing through high density developments.

5. Approach to site allocations

- 5.1.1 This section briefly summarises the approach to deciding on site allocations in the Partial Update. It does not include detailed background to individual sites, but rather includes a short narrative of the overall process.
- 5.1.2 The starting point is the existing Local Plan adopted in 2019 which included site allocations. The Local Plan Review (March 2023) examined these existing sites to determine which sites should be retained (subject to more detailed assessment) and which were no longer required. Generally, those sites that were no longer required were those that had already been completed or were under construction, or sites which had been developed for an alternative use. Sites with planning permission were not identified for removal as there would still be a chance that such sites could come forward for an alternative development, other than for sites under construction.
- 5.1.3 After the Local Plan Review was carried out, the first stage of plan making was a call for sites to be nominated for development or other designations which took place between April and June 2023. This resulted in 17 additional sites being nominated for development within Reading, as well as a number of changes to existing allocated sites. Almost all of these were for residential. These sites were all subsequently included within the Regulation 18 Consultation on Scope and Content document as potential inclusions.
- 5.1.4 The main tool for considering which sites should be included and for what development is the Housing and Economic Land Availability Assessment (HELAA). This is included within the evidence base as a separate document (EV015 for the methodology and covering report, EV0-16 for the detailed tables), and a full description of the approach is within that document, but it is briefly summarised below.
- 5.1.5 The first matter to make clear is that the intention is to identify sites that are capable of accommodating 10 dwellings or more (or equivalent) only within the plan. Below this level predicting which sites in Reading will become available over a 15 year period becomes too difficult, meaning that the actual capacity would likely be understated, and it is better dealt with by way of a small site windfall allowance. For the HELAA itself a lower threshold of 5 dwellings is set to allow a deeper analysis of whether a site is actually capable of accommodating more, but the intention was always that 10 dwellings would be the cut-off.
- 5.1.6 Stage 1 of the HELAA involved the identification of sites. Sources of potential sites included the following:
- Existing allocated sites (these were sometimes broken down into smaller elements where, for instance, there are multiple ownerships such as many of the major opportunity areas)
 - Existing planning permissions or sites with a resolution to grant permission subject to Section 106
 - Call for sites nominations
 - Sites put forward during the Regulation 18 consultation

- Undetermined, refused or withdrawn planning applications
 - Sites subject to pre-application discussions
 - Sites considered in the previous HELAA
 - All significant existing employment areas (corresponding to the plots identified in the Employment Area Analysis)
 - All undeveloped land outside the urban area
 - Other sites including those owned by the Council
- 5.1.7 This stage also involved excluding those sites where development would clearly be unsuitable. A variety of significant constraints were considered here, but most do not apply in Reading. The only grounds on which sites were excluded at this stage in practice was being located in the functional floodplain.
- 5.1.8 Stage 2 involved the assessment of sites. The first part of that was identifying the development potential of the site. For most sites, a pattern book approach was used applying a general density depending on the character of the site (town centre, urban, suburban) and the land use. However, for many sites in the town centre that could be appropriate for a mix of uses a more site specific approach was used, including estimating appropriate height, plot coverage etc. The estimation of development potential was not set in stone at this point, and the approach allowed for this to be adjusted later if grounds were identified.
- 5.1.9 The next part of Stage 2 was the suitability assessment. Each site was considered against a wide range of considerations under the following broad headings.
- General location
 - Existing use
 - Environmental and open space designations and issues
 - Heritage issues
 - Health and safety issues
 - Flood risk
 - Design and amenity
 - Utilities issues
 - Other considerations
- 5.1.10 On the basis of that assessment, it was concluded whether the site was suitable for development for 10 dwellings or more (or the equivalent for another land use). Sites were categorised as 'suitable', 'potentially suitable', 'suitability unknown' or 'unsuitable'. Only sites that were considered 'suitable' or 'potentially suitable' were taken further. At this point, the overall capacity of the site could be adjusted based on the suitability assessment, for instance if this had identified an important area of trees within the site that should be excluded from the developable land.
- 5.1.11 The third part of Stage 2 was the availability assessment. This was informed by writing to the landowners and/or developers of sites to enquire about availability. However, it is worth noting that the response rate was low, and there had to be some

reliance on other information about sites to come to a conclusion. Sites were categorised as 'available', 'potentially available', 'availability unknown' or 'not available'. Only sites that were considered 'available' or 'potentially available' were carried forward to the next stage. Again there was an opportunity to adjust development capacity based on availability, albeit this was not applied in practice.

- 5.1.12 Finally in Stage 2 was an assessment of achievability, which considered whether there were such matters as legal, market or viability issues that would affect achievability. This was in part informed by the responses of landowners referred to above. Sites were categorised as 'achievable', 'potentially achievable', 'achievability unknown' or 'not achievable'.
- 5.1.13 At this point, the HELAA continued onto additional stages, but those are not relevant to determining the individual site allocations. The important outcome was a list of sites that were or could be suitable, available and achievable. Where these sites did not already have planning permission or a resolution to grant permission subject to Section 106 at the point of the Pre-Submission Draft Partial Update, these formed the basis for the site allocations. There were only two exceptions where it was not considered appropriate to allocate for particular sensitivities around the site, but these were relatively small sites and were not sites which landowners or developers were promoting for inclusion.
- 5.1.14 In some cases, HELAA sites were combined to form a larger site in the allocation. This was the case for many of the major opportunity areas (all of which were existing allocations in any case) but it was also the case for a site such as CR14g (The Oracle Riverside East) which combined two adjacent sites in the same ownership.
- 5.1.15 The potential allocations also included some sites that were considered suitable but where availability and/or achievability were unknown, where it was considered important to set expectations for those sites. An example of this is Hemdean House School, where the school use recently ceased. This is because over a 15 year Local Plan period such sites may well come forward. However, the overall HELAA figures did not assume any delivery from these sites.
- 5.1.16 The matters identified as important during the suitability assessment were generally those referred to in the bullet points for the site allocations, including matters such as flood risk, important trees or relevant heritage assets. In some cases these bullet points also reflect matters raised during consultation.
- 5.1.17 The final capacity figure from the HELAA (before variance rates were applied) formed the basis for the indicative capacity within the policy. This number reflects the capacity of the site that had not already been delivered at 1 April 2024. However, it is important to reflect that the HELAA is not an exact process, and the quite specific figure that emerges from it would be too prescriptive to include within the policy as it is. For this reason, a range was specified which in almost all cases represents 20% less than the HELAA figure at the bottom and 20% higher than the HELAA figure at the top. In the case of very large allocations, these figures are also rounded. However, it is important to note that, as set out in the Local Plan Partial Update itself, this process cannot fully design out the sites, and the ranges are therefore intended

to be indicative only. At planning application stage it may well be possible on the basis of detailed design to demonstrate that an alternative figure is appropriate.

- 5.1.18 The process outlined above resulted in a significant number of new site allocations as well as adjustments to existing sites, often reflecting a change to the assessed capacity of those sites, based on the same process that informed the level of development for which the strategic policies such as H1 are planning, ensuring that the plan remains consistent.