

READING BOROUGH LOCAL PLAN PARTIAL UPDATE CONSULTATION ON THE PRE- SUBMISSION DRAFT (REGULATION 19)

STATEMENT OF CONSULTATION

May 2025

Contents

Contents	2
1. Introduction	3
2. Details of Consultation	4
Figure 1: Approach to Development Plan Documents from Statement of Community Involvement	4
Table 1: RBC Comms Plan	5
Table 2: Engagement information for posts on X and Facebook.....	6
3. Results of Consultation: Drop-in Events.....	7
4. Results of Consultation: Written Responses.....	8
5. Evaluation of Consultation.....	9
Appendix 1: List of Those Consulted on the Pre-Submission Draft.....	10
Appendix 2: Consultation Email Text	25
Appendix 3: Council’s Press Release.....	26
Appendix 4: Press Articles.....	28
Appendix 5: Exhibition Boards for Drop-In Events	29
Appendix 6: Social Media Assets	33
Appendix 7: Selection of Social Media Posts	34
Appendix 8: Consultation Responses	36
General comments	37
Comments on specific sections of the plan.....	41
Comments on Evidence documents	229
Appendix 9: Summary of responses to social media promotion.....	235

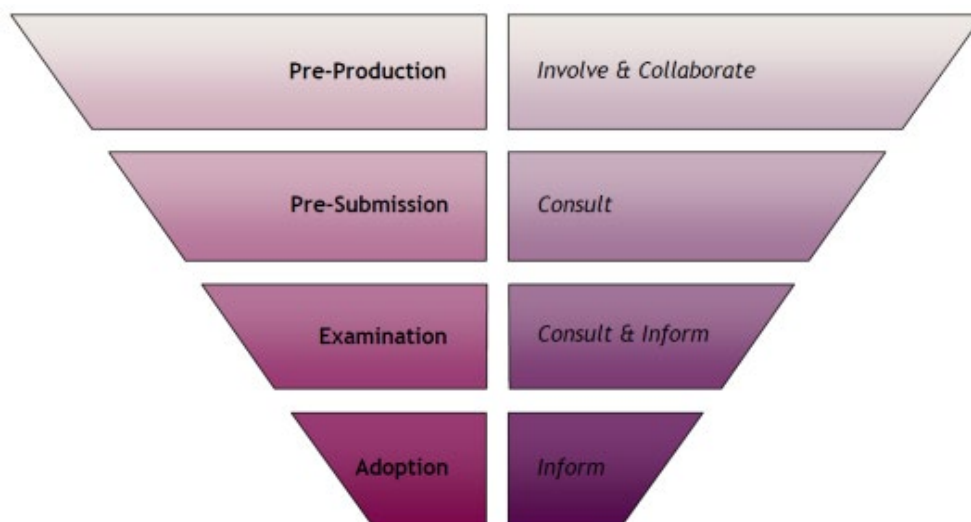
1. Introduction

- 1.1. The Regulation 19 consultation that took place between November 2024 and December 2024 related to the Local Plan Partial Update (LPPU) for Reading. It was decided to proceed with a Partial Update following the Local Plan Review (published in March 2023) which identified the need to update 45 of the 90 policies in the plan. Updates for certain policies were required for a variety of reasons, including new national policy and legislation, changes in circumstances and monitoring of the effectiveness of policies.
- 1.2. The first consultation stage on Scope and Content took place from November 2023 to January 2024. This document described the approach that will be taken to updating each policy but did not contain a draft update. The Scope and Content document was informed by the Council's own evidence to understand what the need for homes would be using alternative methodology. The Scope and Content identified all sites that had been put forward for inclusion in the draft plan. Supporting documents such as the Infrastructure Delivery Plan and the Sustainability Appraisal were also made available for comment.
- 1.3. The Regulation 19 consultation related to the Pre-Submission Draft of the LPPU. This document was a full draft, after taking into account representations received during the Scope and Content consultation as well as other emerging information. Supporting documents such as the Proposals Map and Sustainability Appraisal were also made available for comment.
- 1.4. The Strategic Environment, Planning and Transport Committee approved the Pre-Submission Draft for consultation on 15th October 2024 and it was published on 6th November 2024 alongside supporting documents mentioned above. The Consultation ran until 5pm on 18th December 2024.

2. Details of Consultation

- 2.1 Consultation on the Pre-Submission Draft begun on Wednesday 6th November 2024 and lasted until 18th December 2024 at 5pm, a period of 8 weeks. The Sustainability Appraisal, Proposals Map and Background Paper were also made available online for public consultation during this period.
- 2.2 In terms of an approach, the consultation on planning policy documents need to be undertaken in line with the Council's adopted Statement of Community Involvement (SCI). The latest version of Readings SCI was adopted in March 2014.
- 2.3 The SCI sets out some general guidelines for how consultations on the local plan should take place, with the main principle being involving stakeholders at the earliest stage. Figure 1 shows the general approach to each stage of consultation:

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



- 2.4 The SCI gives some examples of the types of exercise that might be appropriate at the Regulation 18 stage, which include:
- Interactive workshops;
 - Questionnaires;
 - Leaflet drops across a defined area;
 - Exhibitions, particularly in locations and at times which would maximise the number of people not previously involved in planning matters attending, e.g. shopping centres;
 - Online resources, including interactive webpages or questionnaires;
 - Forum discussions, which could include specific groups such as developer/landowner forums.

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

2.6 The consultation consisted of the following elements:

- Directly emailing over 2,068 contacts on the Council's consultation lists, including statutory consultees, adjoining local authorities, Parish Councils, community and voluntary groups, commercial organisations, businesses and interested individuals. The full list of those consulted is in Appendix 1, the text of the email is set out in Appendix 2.
- Documents (including the Local Plan Partial Update, Sustainability Appraisal and Infrastructure Delivery Plan) were made available on the Council's website;
- Physical copies of the Pre-Submission Draft, Proposals Map, Sustainability Appraisal and Background Paper were made available at Reading Borough Council local libraries and in the reception of the Reading Borough Council Civic Offices;
- Social media assets were created and posted to online platforms such as Facebook and X (formerly Twitter) via RBC's main social media account. Table 1 shows the comms plan which includes dates the consultation was promoted on social media, as well as the platform and general content contained within the post. Table 2 provides details on the engagement for each post on X and Facebook. For a summary of the comments received in response to these posts, please see Appendix 9.
- A press release was prepared and distributed (see Appendix 3). From this, articles on the Local Plan appeared in the local press (see Appendix 4),
Two drop-in events, where members of the Planning team were on hand to discuss issues arising together with exhibition boards (see Appendix 5) and copies of the Pre-Submission Draft document, Proposals Map and Background Paper, was held at Reading Civic Offices on Tuesday 26th November 2024 between 1-6pm and Wednesday 13th December 2024 between 2-7pm.

Table 1: RBC Comms Plan

DATE	EVENT	COMMS
6 Nov	Launch of consultation	<ul style="list-style-type: none"> • Web page live • Press release • Social media – X, FB
21 Nov	Advising dates of consultation drop in	<ul style="list-style-type: none"> • Social media
25 Nov	Reminder about consultation drop in	<ul style="list-style-type: none"> • Social Media
26 Nov	Consultation drop in	<ul style="list-style-type: none"> • Drop in event at the Civic Offices
8 Dec	Reminder about consultation drop in	<ul style="list-style-type: none"> • Social media
13 Dec	Consultation event hosted in person by Tilehurst GLOBE	<ul style="list-style-type: none"> • Arranged by the group directly with the Planning Policy Team

13 Dec	Consultation drop in	<ul style="list-style-type: none"> Drop in event at the Civic Offices
17 Dec	Reminder of consultation closing	<ul style="list-style-type: none"> Social media

Table 2: Engagement information for posts on X and Facebook

Date	X	Facebook
6 Nov	14 clicks 4 shares 714 reach	10 clicks 1 share 1 like 731 reach
21 Nov	2 clicks 3 shares 396 reach	2 clicks 1 likes 498 reach
25 Nov	6 clicks 379 reach	3 clicks 1 like 1 comment 562 reach
8 Dec	4 clicks 3 shares 550 reach	5 clicks 1 share 3 likes 1 comment 714 reach
17 Dec	11 clicks 1 share 365 reach	63 clicks 11 shares 3 likes 3.2k reach

3. Results of Consultation: Drop-in Events

- 3.1. The two drop-in events were not particularly well-attended, perhaps reflecting the continued reliance on accessing information online. However, the low number of attendees in person allowed for in-depth discussions on specific sites and their indicative densities that were included within the Pre-Submission Draft document.

4. Results of Consultation: Written Responses

- 4.1. The Council received 113 comments from different individuals and groups in response to the Scope and Content consultation. The format in which the responses were submitted comprised the following:
 - 27 persons completed the online questionnaire
 - 86 comments were received via email
- 4.2. The responses came from a number of individuals (such as local residents), statutory consultees, planning agents (on behalf of landowners), local groups and organisations, community associations, the NHS, and more.
- 4.3. A summary of each individual representation is included in Appendix 8 to this document.

5. Evaluation of Consultation

- 5.1. Generally, the approach to the consultation on the Pre-Submission Draft was reasonably productive in view of the resource constraints for carrying out such a consultation, particularly in terms of officer time. Given that the consultation was in relation to a Partial Review only, rather than a full update of each policy contained within the existing Local Plan, the number of responses received is considered to be adequate.
- 5.2. Attendance at the drop-in events was low compared to previous years. This is likely to be a result of more people accessing information on the internet. However, it may still be worth continuing to offer this facility in future years for those who do not have web access or who want to discuss matters in detail to ensure our approach is equitable.

Appendix 1: List of Those Consulted on the Pre-Submission Draft

1 Right Plan	Purcell	Andrew Edwardson
Ian and Ruth Wallace	Berkeley Group (Oxford & Chiltern) Ltd	Council Andrew Hornsby-Smith
Anna and John Beasley	Macniven Quays	Andrew Mather
Andrew Scott	Pegasus Group	Andrew Beard Planning
The Launchbury Family	Rapleys LLP	Sykes Capital Ltd
Adrian Keal, Nexus Planning	AFA Ltf	Wargrave Design Consultancy Ltd
Nexus Planning	Aspire Architectural Services Ltd	Woods Whur
Pangbourne Beaver Investments	Reddaways	Mr Andrew Clayfield
A1 Planning Portal	Alex Hill	Mr & Mrs Cooper
Adam Masters	Alexander Petin	Andrew Tudor
Mr Aaron Collett	Alexandra Hemming	Mr Andrew Somerville
ABA Chartered Surveyors	Dr Alexandra Skeaping	TEW Design
Abay Architecture	Councillor Alice Mpofu-Coles	AM2 Planning
Julia Abbott	Darrington Architects	Bluesketch Studio
Angela Castleton	Alice Cochrane	Philip Wadge Architecture
CAN Structures	The JTS Partnership LLP	Andrew Cresswell
Briony and David Downey	Alison Hicks	Andrew Taylor
Adam Boulding	Amy Ireson	Angela Macdonald
Adam Conchie	Alison Foster, Royal Berkshire Hospital	Angela Wright
Councillor Adele Barnett-Ward	Alistair Appelton	Angus Irvine, Rapleys
Arcci Designs	Alison McNamara	AK Draughting
Art Consultants (UK) Ltd	Rentplus	Anita Soulsby
Edward Mather	Paul Allcock	Mr Paul Morris
CPL Chartered Architects	Mr Allen Sinclair	Ann Wells
Extension Plans UK	A MacGregor	Ann Roughan
Hives Architects LLP	Alistair Lucocq	Anna Stott, Indigo Planning
Lydia Unwin-Parker	Alan Penton	Anna Tomkins
Rowberry Morris	Councillor Ama Asare	Mrs Ann Briers
Studio 136 Architects Ltd	A M Andrews	Councillor Anne Thompson
T2 Architects	Mrs Anna Ellis	Anne Davis
Woodley Town Council	AK Dave	Anne Pink
WS Planning & Architecture	Turley	Mrs Anne Atkinson
Earley Town Council	Amersham Road Estate Neighbourhood Association	Annette Jukes
Artichoke: Architectural Consultancy	Future PD	Annie Gedy
Mr Adrian Windisch	Amir Langhaei	Ann Morrow
Dr Adrian Tompkins	Keenan Project Designs Ltd	Anthony Reeve
Adrian Clarke	Councillor Amjad Tarar	EA Town Planning Ltd
Rapleys	Engineers Associates	Design Coalition Ltd
Anna Gargan	Amritha Sahajan	Dr Antony Cowling,
Pik Sin Leung	Signcraft	Greater Reading
Civil Aviation Authority	Amy Hambleton	Environmental Network
Tahira Kulsoom	ABDA	Mr Alan Overton
Alan Wells	Andrew Bennellick	Patricia Appelton
Mr Alan Rutter	Andrea Grashoff	Inception Planning Limited
Alan Green	Andrew Crabtree	Janice and Tony Walker
Mr Alan Beardmore		ARCDS
Alan & Pat McMahon		ArchDezine Limited

Mr Richard Fenn, Richard
Fenn Designs Ltd
Stephen Alderdice Studio
Arsen Architecture
Pro Planning Solutions
Mr Barras
Arthur op den Brouw
Maria Theresa Molner
Art R Miller
AsB Architecture Ltd
Ann Jenkin
Ashleigh MacFarlane
Ashley Pearce
International Sign
Association UK
Andrea Sharpe
Jackie Astley
Jim Dunkley and Susie
Downer
Aves Architectural
AW Architecture Ltd
Akira Yamanaka
Architects
Ann Ayers
Space-Q Studio Ltd
Andrew Ballsdon
Barbara Goodbun
Barbara Harding
Barbara Garden
Fiona Kavanagh
Barnaby Wheeler
Barrie P Smith Ltd
Chart Plan (2004) Ltd
Jon Barber
Scott Versace
Richard and Linda
Beakhouse
Rebecca Curtayne
Eileen Willans
Ben Burfoot (RBC
Sustainability)
Ben Fox, Planware Ltd
Ben Neo
Ben Stanesby (RBC
Leisure)
Andy Paterson Architects
Ltd
TPO Design + (The
Planning Office Limited)
Absolute Architecture
Benjamin Hill Designs
Richard Bennett, Reading
Civic Society
Globe – Newtown
Berkshire Gardens Trust

Studio Charrette
Bernard and Haydee
Hagger
Freeths LLP
Beth Pywell, CBRE
Dr Beth Green
Ms Beth Scott
Mr B Garvie
Mr Biddle
W Treadwell
Rob Bishop
Redlands GLOBE
Carol Morton
Bhupinder Mann
Sport England
Bob Tarling
Planning and Design
Group
Robert Ayers
Rob White
BOB ICB
R Sharples & Associates
Robert and Debra
Wheeler
Robert Young Associates
Bonney Architecture
John Booth, Reading
Friends of the Earth
Eric Bowes
A Brackenridge
Mr Brendan Ridge
Brendan Naughton
Charlotte Brendan Byrne
Brian Grady (RBC
Education)
Brian Jamieson
Mr Brian Oatway
Stoneway Church
Mr Brian Warren
Bridget Hickey (RBC
Parks)
Bridget Fox, Woodland
Trust
Miss Britt Bjoro
M Brooks
Davistate
The Market Design and
Build
Mr Lyttle
Mr Barry Blewitt
Rick Thompson, BT
Peter Tilbury
RBC Building Control
Michael Burgess
Isabel Burn

Busby K Architect
Ms Caroline Anscombe
Thames Properties Ltd
Carolyn Michaels
Gravitas Contracts
Colin Ponting
Carolyn Ribbons
Michael Smith
Dr Carol Brickley
Procter & Gamble UK
Barton Willmore now
Stantec
Dr Abigail Macleod
Reading Gardeners Club
Bastion
Cantley Drawing Services
Reading Rowing Club
Harwood Savin Ltd
McCarthy and Stone
Retirement Lifestyles Ltd
Gavin Carley
Milhouse Films Ltd
Bramhall Town Planning
Ltd
Mrs Carol Froud
Caroline Aubrey
Caroline Nash
Faithorn Farrell Timms
LLP
Caroline Hall
Dr Caroline Charles
JCNAS
Catherine Durham
Langdale Planning
Limited
Catherine Wood
Ms Cath Moffat
Cathy Szklar
Caversham Traders
Association
ECE Planning Limited
Climate Change Centre
Reading Borough Council
CCTV, TVP
Gillots School
Mr Chris Webster
Conservation Area
Advisory Committee
Friends of Caversham
Court Gardens
Mr Craig Anderson
Charlene Chetty
Mr Charlie Clare
Cleaver Property
Management

Charlotte Hayward
Quod
Bluestone Planning
Charlotte Markey, Green
Blue Urban
Charlotte Wilshire
Hunters
Chiara
Rebecca Sherbird
Christopher Hinton
Chin Wey Yee
Geo Green Power
Moorgath
RBC Streetscene
Management
RBC Transport
C M Markin
Tetra Tech
Owens Galliver Architects
LLP
Apollo Interiors
Dr Chris Howlett
CG Architects
Christopher James
Architecture
HSR Design
ICost Advisory Limited
The Keen Partnership
Christopher Lack
Chris Whitehead
Chesters Place Limited

Yateley Drawing Service
Ltd
Mr Chris Wood
Mrs Ida McVetis
Holmes
Chris Knox
Christopher Lovell
Mr Christopher Bedford
RBC Culture
Christian Brailey
Architects
Christian Brailey
Architects
Mrs Christine Northway

Christine Williams
Christine Lalley
David Salisbury Joinery
Chris Tong
Weston & Co Architects
Ltd
Chris Guy
Christo & Sons

Ciaran Coughlan
Cindy Goslar
Pegasus Planning Group
Miss Coral Cissewski
Firstplan
Clair Drever
Claire Kurowski-Ford
Claire Smart
Chapman Lily Planning
Ltd
Councillor Clarence
Mitchell
Clare Powell
Eye And Dunsden Parish
Council
Holybrook Parish Council
Kidmore End Parish
Council
Purley On Thames Parish
Council
Shinfield Parish Council
Sonning Parish Council
Tilehurst Parish Council
Mrs Claire Gulliver
Reading Climate Action
Network
Powell Skeete Associates
Limited
Spencer Architecture
Limited
Clive Orr
Clive Bedford
Cllr Tony Jones
Age UK Reading
Mr Napier Munro-Faure

Coley Park Community
Association
Colin Calder
Network Rail
Archytas Ltd
Tilehurst Poor's Land
Charity
Colin and Christine
Robinson
Colston Estates Limited
Ambulance Service
John Connell
Stantec
Gardens Trust
The Gardens Trust
Tetlow-King
Marine Management
Organisation
Natural England

Squires Planning
Francesca Wray
The Sirius Group
Consumer Protection
All About Lofts Ltd
Baker Street Area
Neighbourhood
Association
Berkshire Muslim Arab
Community Assoc
Thames Valley Police
CPRE Berkshire Branch
Craig Lamden
Craig Patchett
Optical Express
Reiss
Crossrail
Srdjan Culafic
Ms Judith Cullen, Globe
Tilehurst
Miss Susan Curd
Loftplan Designs
Mrs Christine
Cuthbertson
Cyrus Goodall
Dr David Sutton
David Copley, Kennet &
Avon Canal Trust
Reading Climate Change
Partnership
Hicks Bakers Ltd
CVS Designs Ltd
Mr David Cole
David Griffiths
Jacqueline Fisher
Mr Damian Bell
Dan Blake, DHA Planning
Dan Fundrey
Daniel Andrews
Indigo Planning
ROK Planning
Trees - Parks
Daniel Jones Planware
Ltd
Abri Build
Aura
D Rose Planning LLP
Elstree Land
Daniel Chandler
Danny Wozny
ATP Group Partnership
Shaun Tanner
Architecture and Planning
Darren Cook RBC
Mr Darren Lovelock

STUDIO BAD
ARCHITECTS
Mr David Earnshaw
Mr Dave Kenny
Councillor Dave McElroy
Mr David Patterson
G Brown
Dave Cash
Dave Dymond Redlands
& University
Neighbourhood NAG
The Ramblers
Association - Berkshire
Area
Mr David Scull
David Burdon,
Environment Agency
WSP
Portakabin Ltd
David Newnham
David Parsons, Reading
Gospel Hall Trust
David Tarr
Access Architects
Armstrong Planning
David Neale
David Morley
Filbert Designs
Mr Bates
David Honour
Holtham Newman
Architects
Richard Max & Co LLP
Superstrukt
David Brewster
David Cox
David Cooksley
Associates
David and Susan Bailey

DMD Architecture Ltd
David Riddle
The Thackery Estate
Miss Dawn Halpin
Oxford Architects
Gray Baynes + Shew
Deanna Wells
Mr And Mrs Stone
D Brewer
Debbie Cowen
Deborah Dadd
Councillor Deborah
Edwards
Mr Declan Doherty
Declan Smith Architect

Mr & Mrs Sirisena
Delphine Pellenc
Derek Robinson
Mr Derek Bertin
All Design Matters
Taylor and Co Architects
Design Two Seven
Thames Water
Wokingham Borough
Council
Kings Property of Royal
County of Berks Limited
Mr Derek North
David Clarke
SusTrans
DHPUK
Diane Honey
Llisa Digweed
Defence Infrastructure
Organisation
MOD - Defence
Infrastructure
Organisation
Spratley & Partners
DK Design
Denis King And Gillian
King
DLA Town Planning Ltd
Mr Lumbroso
David Rowley
Mr Darren Mulcahy
Magdi Dahroug
Mrs Dorothy Gibert
Dominic Thirlwall
Donna Pentelow (RBC)
Mr G Goodall
Nova Planning
Charlotte Burrowes
Dorothy Bugeja
Councillor Doug
Cresswell
DPDS Consulting Group
Deighton Peter Raeburn-
Ward
David Roberts
David Capstick
David Richmond
Mr Omkar Adhikari,
Everest Tandoori
D J Bailey
Mr DS Dunlop, D2
Planning Ltd
David Taylor Design
Services
Mr Browne

Campbell Gordon
Mr Duncan Wooldridge

Mrs Deirdre Wells, Red
Kite Developments
Mrs Mavis Hallett
My Planning Drawings
DOT Surveying
Martin & Pole
Eamonn O'Donnell
A H Eberst
Eleanor Pitts
Arup
Colony Architects
Eddie Street
Edmund Bradley
Mr Edward Hammond
Lichfields
Elaine Fullbrook
Emmer Greens
Association
Mr Edward Wild
Eileen Brooks
Elaine Dobkowski
Mrs Elaine Warwick
Elaine Mountford
Danks Badnell Architects
Ltd
Conor Elliott-Walker
Bolt Services UK Limited
Mrs Elizabeth Blair
Mrs Elizabeth Parsons

Green Retreats Ltd
CBRE
Councillor Ellie Emberson
Brocklehurst Architects
Ltd
Mr William Pocock
David Hewitt
Mr Paul Harrison
West Berkshire District
Council's Emergency
Planning
Vodafone and O2
Barton Willmore
Evans Jones Ltd
Reynolds Design Ltd
UPP Architects + Town
Planners
Pinnacle Architecture
Limited
Kier Construction
Ridgepoint Homes
Mrs Emma Card

Emma Green
 Emma Fletcher
 Emma Rawlinson
 E&F Engineering
 Bureau Veritas
 Adcock Associates
 Fusion Architecture
 Stuart Henley & Partners
 Sheppard Robson
 Barclays Bank Plc
 The Crown Estate
 Architectural Drawing
 Services
 Environmental Protection
 Mr Eric Bolton, Creative
 Design and Structure Ltd
 Historic England
 Euan Sarson
 Eurohaus Ltd
 Evelyn Williams
 Explosives Inspectorate
 Aisha Pervaiz
 Bailey Partnership
 Abu Fahad Design &
 Build Limited
 Debra King
 F A Planning Services
 Forward Planning and
 Development
 Friends, Families and
 Travellers
 Councillor Finn
 McGoldrick
 Ms Fiona Loughlin
 Berkshire Archaeology
 Fiona Kinnison
 Food4Families
 Mary Ford
 Mr Colin Ford
 National Quarries
 Inspection Team
 Swindon Borough Council
 Forrest Property Services
 France Gerard
 Mrs F Hyman
 Francis Brown
 Gillian Varley
 Phillips Planning Services
 Limited
 Miss Freda Hyatt
 Friends of Caversham
 Court Gardens
 I Rivers
 Fiona Watson

Mr and Mrs G Breadmore
 Malgorzata Starzynska
 Gabriele Alese
 Mapeley Estates Limited
 WSP
 CBRE
 Gareth Warwick
 Gareth Bertram Ltd
 Gareth Rees
 Gary Evans
 Gary Pearce Associates
 T.J.Morris Ltd
 Gavin Jackson Architects
 Gavin Jones Architecture
 Limited
 Mr Gavin Moyse
 Mrs Gillian Wilson
 Joan And Graham Clark
 Jonathan And Gemma
 Matthews
 Mr Geoff Armstrong,
 Armstrong Rigg Planning
 Geoffrey Foley
 RBC Children's
 playgrounds - Parks
 George Daugherty
 RBC Community Safety
 Kendall Kingscott
 Jerzy Nowacki
 Asbri Planning
 JDRM Architects
 George Bickerstaffe
 Carney Sweeney
 Gerry Wall
 Graham Brown
 Life-U Design
 Giles Lunn
 Trace Architects
 Gillian Makin
 Gillian and Denis King
 Andrew Clifton And
 Annette McCartney
 Julie and Gary Robbins
 Councillor Glenn Dennis
 RBC Cllr
 Glen Slade
 G Moffett
 Geeta Nath
 Gordon Battle
 Mr Stuart Gould

Councillor Graeme
 Hoskin
 RBC Open Spaces
 Graeme Powell
 Denton And Gibson Ltd
 EwanGrahamDesign
 Graham Griffiths
 Graham Holt
 Mr Graham Jerome
 EAAS
 Mr and Mrs Booth
 Granville Orange
 Mrs Janet Gray
 Michael Elliott
 Green Economics
 Institute Trust
 Greenshadows Arch
 Services
 Greg Farrell
 G J Grashoff And A B
 Grashoff
 Greg Lewis
 Architecture & Interior
 Design Ltd
 Ashleigh Signs
 Kalsi Designs
 Hudson Hives
 Partnership Limited
 G Walker
 Westbuild Homes Limited
 Mrs Hazel Matthews
 Helen Poynter
 Jessica Hammett
 K2 Developments
 Mr Johannes Hersbach
 Paul Harper
 HAC
 Harry Manners
 Montagu Evans
 Cosy Homes Oxfordshire
 Harlen Caisido Catering
 Ltd
 Ian Campbell
 Hayley Brommell
 Hayley Thomas
 HSE on Hazardous
 Substance Consents
 Helen Bryant
 Mr And Mrs C.R. And
 H.E. Hanshaw
 Colin Hatcher Pang
 Valley Group of the
 Ramblers
 Mr And Mrs C K Neo

Planning Potential
Mrs Heidi Anderson
Walsingham Planning Ltd
Disabled Access Group
Helen Clark, NHS ICB
Property Services
Hampshire County
Council
Verve Planning Ltd
CEMEX - National
Reserves Department
Helen and Steve
Goodchild
Miss Helen Gibson
Mrs Helen Lambert,
CADRA
Extension Plans UK
Nigel And Helen Dodd

Hives Architects LLP
Nicholas Hill Thompson
Mrs Linda McCauley
Private Sector Housing
(previously known as
Housing Environmental
Protection (HEP)
Herbert Monteith
Vijay Thamman
Hazel Andrews
HMO team
Harvey Smith
Mr John Hoggett
LSG Ltd
Ms JM Langford
James Harris
Howard Thomas
Marta O'Brien
A&Q Partnership
Mr Hugh Saunders
K S Hughes limited
Edward Mather
Ms Catherine Hutchison

Collins & Coward
Ian Macro
Ian Howard
Ian Sullivan Architectural
Design
Ian Lasseter
Mr Ian Mackinder
Mr Ian Knock
Ian Hunt Associates Ltd
Ian Duddle
Ian Lloyd
Ian Sutherland

Ian Watsham
Spec
Mr Ian Cuthbert
Integrated Research and
Dev Centre
Miss I Bradshaw
Ak Design and
Architectural
Laureus Developments
A2Dominion Group
Abu Bakr Masjid
Abstract Plans
Adapt Architecture
Architectural Designs
Services (UK) LTD
ADSJ Associates Ltd
Age UK Reading
Arcadia Design
ArchiGrace Limited
Archi-tekt Partnership
Armstrong Rigg Planning
Avan Plans
Avanti Cycling CIC
BBOWT
BJD Designs
Chair, Reading Chamber
Of Commerce
Bell Tower Community
Association
Berkshire Archaeology
Bluebird Design Services
Blueprint.Vista
Brighter Steps Ltd
Caversham and District
Association
Canopy Planning
Services Ltd
Carter & Son (Thatcham)
Ltd
Mr And Mrs Taylor
Caversham GLOBE
CABE
Circle-Z Limited
Cohanim Architecture
Connect Reading
Mr Alan Barnes
Creative Design
and Structure Ltd
Design and Plan
Consultants Ltd
Cresta First Raleigh
Define Space Ltd
Design Board
Architectural Services
Dunster And Morton

Econet
Efficient Signs & Print Ltd
Excel Planning
Express Planning
Extension Plans
Architects
Fields In Trust
Fineline Architects
Fordingbridge Plc
FORM Design Group
Get Berkshire Active
Go To Professional
Services
Groundwork Thames
Valley
Worton Grange Industrial
Limited
Planning & Building
Drawings
JCEng Solutions Ltd
James Taylor
La Vaastu Ltd
Livarch Ltd
LMAD Architectural
M Architecture Planning
Ltd
M C S Design
Architectural Services
MJD Architecture Limited
MM Planning and
Architecture
Mosaic Building Design
MUGA UK Ltd
Conservatory Design
MZM associates
The National Federation
Of Gypsy Liaison Groups
OPS Chartered
Surveyors
Orange Key Limited
Outsmart
Parkinson Holt LLP
ADS Property Services
Munnings Pitch Architects
Limited
Planning Potential Ltd.
PMV Planning
Pro Arkitekts
Readibus
Friends Of The Earth
RenewableUK
Reading Food Growing
Network
RG Spaces
Riarch Planning Solutions

Reading Voluntary Action
 SAM Planning services
 Samson Space
 Sara Batting Estate
 Agents
 SASi Architecture Ltd
 Sean Payne Arch Design
 Jonathan Irvine
 Town Planning Bureau
 Transition Town Reading
 Thames Valley Air
 Ambulance
 Whitley Community Dev
 Assoc
 Wren Architecture and
 Design
 Civil Aviation Authority
 Ingeborg Ellison
 Architectural Planning
 Irene Lindsay
 Royal Berkshire Fire And
 Rescue Service
 BeforeBricks Limited
 Ms Isla Geddes
 Councillor Isobel Ballsdon
 Devonshires
 Ms Isobel Ballsdon,
 Caversham GLOBE
 Ivan & Pam Rushton
 Izvorski Ltd
 Izzy and Val Williams
 Mr James Cook
 Broadway Malyan
 Maiden Erlegh School in
 Reading
 J Pritchard
 WoodKraft Ltd
 Dr Julia Waters
 Bailey Partnership
 Dr John Partington
 JE Architecture
 Jackie McKie
 Planning Potential Ltd
 Jack Casserley
 JMS Planning &
 Development Ltd
 SRH Architecture
 Quadrant Design
 Councillor Jacopo
 Lanzoni
 White Rock Development
 Ltd
 London Proprietors
 Limited
 Surface Planning

Planning Potential Ltd.
 FCC Environment
 James Ford
 Papyrus Group
 Councillor James Moore
 James Rose
 James Sutton
 James Vale
 Contingency Networks
 Ltd
 James Williamson
 Architects
 JETArch Design Limited
 JL Architects
 McConnell Planning
 Mrs Janet White
 James and Carole
 Russell
 Mr James Walsh
 Sleep Design Studio
 StudioCBD
 Jamie Harcourt
 Faithorn Farrell Timms
 LLP
 Councillor Jan Gavin
 Jan Steele
 Mr Jan Steele
 Ms Hitchcock And Mr
 Watts
 Dr Mani Karim
 Mrs Elizabeth Steele
 Jane Chesterfield
 Jane Harrison
 Jane Hennell, The Canal
 & River Trust
 Jane Hobden and Phil
 Shelley, R Collard Ltd
 Cube Design
 Jane Purnomo
 Jane Bickerstaffe
 Mr And Mrs W Courtnage
 Ms Janet Sherbourne
 Ms J Maher
 Mrs Jan Temperley
 Nancy Jarakana
 Ekon
 RBC Community Centres
 Mr Jason Harper
 Jason Lai
 Mr Jason Pyke
 Danescroft
 Jayantha Ranjith
 Senanayake Rallage
 Garcha Property Group
 LTD

Jason Muir
 Joseph Baker
 Mr And Mrs J Colbourn
 Mr John Wilkins
 Ms Jean Heward
 John Nicholls
 Jeannine Summers
 Bluebird Engineering Ltd
 Jeff Taylor
 Jeff and Jane Thorne
 James Eibisch
 Miss Jenna Polak
 Jennie Newnham
 Jenni Shabani
 Jenny Elliot
 Mrs Jenny Hicks
 Mrs Jenny Cottee, Globe-
 Tilehurst
 Jeremy Acton
 Bluestone Planning Ltd
 J Butterworth Planning
 Jeremy Peter Associates
 Mr R W Embling
 Shinfield Ms Union
 Reading Transport Ltd
 Mr John Mullaney
 Jhahanger Zaman
 Mr Johann Wain
 Mrs Jill Jones
 Kirsten Verran
 Barry and Jill King
 Jim Cushley
 Jiri Brejcha
 Vail Williams LLP
 Wimshurst Pelleriti
 Joseph and Kathryn
 Rigler
 John Adley
 Mr John Holland
 Councillor Jo Lovelock
 Jo Unsworth Smiths
 Gore
 Hone Edwards
 Associates
 Pavilion Youth Club
 Coley Primary School
 RBC Education
 Miss Joanna Bottiglieri

 Mr P Alan
 Joanne Da Silva
 Jodie Brown
 Joe Maphosa Metis
 Homes
 Joseph Parr

Charlesgate Homes
limited
Ministry of Justice
HMCTS
Great Plans
Technical Design
Solutions
John Craggs
Councillor John Ennis
Imperial Properties
(Reading) Ltd
Cognatum
Ashton Architecture Ltd
Elegant Build Ltd
JI Architects
North Shore Living
Transport 2000 Berkshire
Local Representative
John Berry
John Goodall
Mr John Hayes
Caversham Bridge
Garden Centre
Mr John Hendy
John And Meg Vought
First Home Improvements
Ltd
Mr John J Frake
Joanne Hales
Ex-Army Builders Ltd
Pegasus Group
Heineken (UK) Ltd
Jonathan Sebbage,
Savills
HCC Property Services
Jon Spires Architects Ltd.
Highdown Avenue
Management Association
Limited
Jonathan Meek
Mr Jonathan Green
Davies Murch
Mr Jonathan Sutton
Greater London Authority
- Development,
Enterprise and
Environment
Councillor Josh Williams
RBC Cllr
Josh Ng
Ampersand Associates
Ltd.
Ms Marie Percival
Jane Lawson-Mudge
Mr Joseph Provino

LaSalle Investment
Management
Drivers Jonas Deloitte
Judith Oliver
Judy Reddy
Mr John Hall
Julia Mountford
Savills
Julia Toovey
Julia Simkins Architects
Julia Branson
Julia and Steve Farey
Julian Rowley
JTDA
Norma and Julian Ansell
TA Fisher & Sons
Harrison Solicitors
Englefield Estate
Emergency Planning
Jonathan Jones
Joan Walker
James Moore
Pentangle Design Group
Karin Lesnik-Oberstein
Selectaglaze Ltd
Kadambari Michaels
Kalani Seymour
CarneySweeny Planning
Akaal Architecture Ltd
Councillor Karen
Rowland
Ms Karen Rumbol,
Globe-Newtown
Karen Blofield
Miss Karen Reeves
GTH Architects
Kate Corder
Open Spaces Society
Kate Bayley, Bewley
Homes
Katesgrove Community
Assoc
Katherine Slater
Jigsaw Planning
Councillor Kathryn
McCann
KEW Planning
Katherine Abram
Katia Major
Fineline Architects
Karen Hogendoorn
Katie Saunders
Richborough Estates
Katrina Parker
KAW Design

Solve Planning Ltd
Stanhope PLC
Abbots Farm Workshop
Kathleen Fraser-Harding

Mr Keith Downer
Berkshire County Blind
Society
Keith Mack
Mr Keith Weaver
Keith Elliott
Reading Cycle Campaign
Keith & Elaine Faulkner
Mr and Mrs KA Hutt
Mrs Kelly Tatam
Ken Macrae
Sue and Ken Dyson
Mr Kenneth Morris
K H Scott
Kenya Hill, Indigo
Planning
The Noble Consultancy
Ltd
Jones Lang LaSalle
Kevin Bee
Kevin Eustace
Kevin McQueen
Kevin Blackburn
Kevin Rapson
Tollet UK Ltd
Mr Kevin Griffiths
Halsom Mackley
Partnership
UR Architects Ltd
CGL - Child Graddon
Lewis
Lewis Hickey Ltd
Merry and Co
Kieron Gregson
Carter Jonas
Randall Shaw Billingham
Kim Hutt
Amazing Investments UK
Limited
Kirsti Wilson
KG Plan & Design Ltd
KJC CAD & Draughting
Services Ltd
Reverend Keith Knee-
Robinson
Firstplan
K Moore
Bridges Associates
Architects LLP

Oakley Green
Conservatories
Blackdog
Katie Dean
Kim Morley
Kvl Designs Ltd
KVS DESIGN
Keith Faulkner
Kyle Seeley Associates
Louise Turner
Adam Lake
Shaun Langley
Lantern Hill
Larry Watson
Stewart Ross Associates
Laura and Alistair
Johnson
Studio Lolly
Laura De Moxom
Laura Close
Inkspace Ltd.
Lawrie Lee
D and P Solutions Ltd
Ian Lawson
Oxford City Council
Larissa Davis-Wall
Fryer Planning Ltd
Lee Norris Design
Scott Planning
Robert Leeks
Lee And Brian Waite
Leon Collyer
Mr Leon Dowling
Louise Bancroft
Leslie Gibson
Leslee Hopper
Mark and Leslie George
Mr Leslie Chubb
Mr Leslie Burrow
Lewis Daniel Harding
Lesley Heenan
Savills
Liam Hamilton
Whitfield Design
Licensing
Katu Architects
Lime Tree Designs
Lin Godfrey
Women's Learning
Centre
RBC Post 16 FE
Reading Gaol Hug
Society
Lindsay Braine
Lindsey McConnell

Lindsey Brown
Peter and Linda Rendell
Line Design Limited
Lisa Bullock Network
Rail
Lisa Probyn Country
Estates
Lisa Smith
Lis Clayton
Mrs Lis Howlett
Councillor Liz Terry
Ms Liz Ellis
Lizzie Angove (RBC)
RBC Adult Social Care
The Arquitect
Lin Godfrey
LRJ Planning Ltd
Lloyd Pople
James Lloyd
Willowside Homes
Laurence Newman
Mr Nigel Haines
Basingstoke & Deane
Borough Council
Local and Neighbourhood
Plans, CEMHD5
Abbie Griffiths Plainview
Planning
The Loft Conversion
Company (Rdg)
Mr Logan Morris
Feilden+Mawson LLP
Morley Fund
Management Ltd
London Plan
Lorna Andrew And Jed
Ellerby
Lotta Ridgley
Charlotte Steyn
Louise Fenner
Councillor Louise Keane
Louise Acreman
Louise Shah
Stuart Lowe
Wokingham Borough
Council (Local Plan
Update)
Charlie Biss Architect
Createspace Design
Lucy Bureau
Luke Farmer
Union4Planning
Luke Bangs
Ridge & Partners

Northcourt Avenue s
Association
HSE Land Use Planning
Advice Enquiries
Lynda Carroll Architects
Ltd
Lynda Chater
Lynette Hughes
Oxfordshire County
Council - E & E
Lynn Rankin
Mrs Lynn Eggleton
Ms Lynne Lemon
Cllr Mohammed Ayub
Faris Meelad
Mr Mark Young
Majid Mohammad Yunus
Muslim Ladies Club
Mr Magnus Smyly
Abbey Baptist Church
BDS Surveyors Ltd
Davis Planning
Elaine Bloomfield
Jeremy Johnson-Marshall
Ryan Taggart
Sparrow & Trieu
Solicitors
Rachel Hudson
Mr & Mrs Maitland
Dalgleish And Co
Boyes Turner
PCSO Marion Ryall
Ms Amanda Day
Mr Martin Wagner
Dee Park Residents
Assoc
Margaretta Watkins
Gundry and Ducker
Architecture
iPlans
Marie De Viell
Marie-Dominique Meunier
Miss Marissa Tsoukas
MVH Design House Ltd
Mr Mark Ashfield
Home Builders
Federation
Cushman & Wakefield
Councillor Mark Keeping
Redman Timbers
Partnership
Mark Summers
Mark Barratt
Aylward Town Planning
Ltd

Borthwick DBM
The Butler Partnership
FPHS
Floor Plans Express
Mr Richard Goldup
Umaa Architecture LTD
Widbrook Developments Ltd
Mr Mark Drukker
Mark Eveleigh
Helix Contracts Ltd
Mark Leedale Planning
Mr Mark Roach
Marta O'Brien
Purcell
Mr Martin Brommell
Bennett Construction Ltd
JCDecaux UK Limited
Inchcape Estates Limited
Martin Bishop
Martina Brejcha
Mr Winter Martin F.
Winter Chartered
Engineers
Mr Martyn Jones
Sonic Star Properties Ltd
Tennant Support Ground Floor
Mrs Mary Matchwick
Mrs Mary Waite
Mary Bartlett
Mary Cook
Dr Maria Pletnikova
Reading University
Momina Ahmed
Urbanspace Planning Ltd
Rapeys
Mr Matt Richardson
Sovereign
MP Matt Rodda
Councillor Matt Yeo
Architecture Design Limited
Mr And Mrs M Gulliford
Oakleaf Building
Surveyors Ltd
Matthew Roe
Museums, Archives And Libraries
Coffee Avenue
Mrs Susan McCready
Mr Matt Shaw
Gamut Building Solutions
Max Goode Carter
Jonas

Ms Dawn Whipp
Mayfair Reading
Architects
Martin Butler Partnership Ltd.
Mr M Barrett
Matthew Carter
Mark A Chadd Ltd
Architectural Services
Kim Pearce CADRA
Mr John McLeod
Mark Chapman
MCM Consultants
Mohan Everett Ashill
Country Land and Business Association
SkyLofts Ltd
Dr Megan Aldrich
Meghan Rossiter
Abri
Mekkara Architectural Consultants
Melanie Sutherland
Berkshire Conservation Volunteers
Iceni Projects
Councillor Meri O'Connell
Ridge And Partners
MBH Design Studio
Reading Ex British
Gurkha Association
Stantec UK Limited
Michael Payne
Mike Steen (BFFC) RBC Education
Dakota House Of Design
Planning By Design
HTA
Michael Burnet Smith
Michael Geater
Watlington House
Management Committee
Margaret and Michael Pocock
Mr Michael Wellock
Clarke Telecom Limited
Wilders Associates
Mr and Mrs Griffin
Michele Page
Heritage Fusion
MP Architecture
Boyer Planning
Miss Michelle Sleaford
Councillor Micky Leng
Mike Brammer

Mike Merrick
BW Architects Ltd
FRC Consultants Ltd
HCH LLP
ISIS Planning and Design
Milton Architects Ltd
Michael Parker
Mr Michael Thomas
M Maarij
Bellway Homes
David And Gaylene Shepherd
Mahesh Jayaraman
Martin Juckes
Councillor Mohammed Ayub
Motik Consulting Associates
Monika Bulmer (RBC)
RE3
Joan Moore
Morgan Architectural Designs
Moxie Gibson
Consultancy and Training Ltd
Reynolds Associates
Mr David Harris
Jacks Fish and Chips
Mr Richard Mallett
Paul Goddard
Mr Tony Martin
The Ruddick Partnership
Marco Zuppone
Miss Melanie Tether
Mary Phelan
Victoria Park Community Group
Jane Field
Cookham Design Partnership
Murielle Brugoux
Elaine Murray
Mr And Mrs A Murray
Murray Hyden
Reading Muslim Council
IKEA Investment Properties Ltd
Maria and Winston Wainwright
Paul Myerscough
The Plan Hub
Mulalley
Professor Nigel Bell

Dr And Mrs Caithness
University Of Reading
Raja Sekhar Nemani
A. Maan Architectural
Services Ltd
Napier Architects
Auto Solutions
Natalie Pryor
Natalie Horner
Architectural Design
Technical Signs
Planning By Design
Deloitte
SGN and/or British Gas
SGN
National Grid
A&N Architects Ltd
Bell Cornwell Chartered
Town Planners
Spen Hill Developments
P R Eley
Dr Neil Buchan
Neil Denham
White Young Design
Limited
Chillingham Limited
Reading Chronicle
Kennet and Brunel
Community Assoc
Nicolas Everitt
Brook Morton
Architecture
Farrell & Clark LLP
Sherborne Windows Ltd
Lichfields
Nick Read
Environment Agency
Nick Thompson
Reading Rep Theatre
Mrs Zoe Page-Smith
Mr Nick Clark
Nick Hutsteiner
Nick Lamb
FDF Architecture
Ms Nicky Simpson
Miss Nicola Hamblin
Nicky Bradley
Mapledurham Community
Energy
Mrs Nicola Tipler
Nicole Fox
Nigel Horton-Baker
REDA
Mr Derek Chapman

Creative Design and
Structure Limited
ART @ Rooshika
Woolhampton Design
Centre
Nick Hunter
Noelia Cabello-Moreno
National Police Air
Service
Norman Bullock
Savills
Reading Buses
Daniel Watney LLP
HSE Nationally
Significant Infrastructure
Projects (NSIPs) and
Development of National
Significance (DNS)
N. Turner Designs Ltd
Jim and Margaret Nutley
Oasis Planning
Steve Ayers
Access Loft Conversions
ADrawings Ltd
EA Town Planning Ltd
ET Planning
De Jager Consultancy TA
Maidenhead Planning
Michael Pagliaroli
Architects Ltd
Saunders Boston
Taylor Design Architects
Limited
Oliver Robertson
Oliver Maitland
Mr And Mrs Christopher
O'Malley
Office of Nuclear
Regulation
Pont + Wils Architects Ltd
Oxford Road Safer
Neighbourhood Forum
Oisin Lynch
Peter and Linda Smith
Pamela Mills Design
Studio
Pam Reynolds
A1 Space Design
Mr Parmod Sharma
Berkshire Van Hire
Kayode Adekola
Laurence and Patricia
Callan
Patricia Burt
Highways England

Bonney Architecture
Andrew Neil Associates
Ltd
Pat Watson
Fastsigns
PHD Building Advisory
Limited
Mr Paul Elford
Councillor Paul Gittings
Turnkey Design
Partnership Ltd
Mr Paul Turnock
Councillor Paul
Woodward
Paul Edwards
Architecture
PSD Architectural
Services Ltd
Professor Paul Bardos
R3 Environmental
Technology Ltd
Paul Broderick
Paul Buck
Paul Butt Planning Ltd
Pauline Monks
Paul Hammond
Mr Paul Raynsford
Mr Paul Rylands
Paul Hamilton
Paul Williams
Philip Brown Savills
Richard Purkis
Penelope Baldwin
P Townsend
Mr Peter Hempstead
Development In Design
Goadsby Planning &
Environment
Peter & Jacqueline
Charles-Jones
Turley
Peter Redman NHS ICB
Rider Levett Bucknall
Mr Peter Wood
Mr And Mrs Peter &
Jennie West
Peter Bowles
Nascot Homes
Mr Peter Hallbery
Stanway Little Associates
Mr Peter Weaver
Mr And Mrs Halter
Mr Paul Higginbotham

Mr Phil Baines Baines
Builders
PHILIP Norfolk Planning
and Property Consultants
Ltd
PJH Design
Mrs Eileen Uden
Projects Team - Reading
Borough Council
Herbert J. Stribling &
Partners
Miss Davies
Reading and Mid Berks
CAMRA
Peter Morris
Pioneer Designs Ltd
Bellway Homes (Thames
Valley)
Pip Waite
Peter J Vallance
Mr Peter Woodbridge
Plan Ahead Drawing
Services
Rushmoor Borough
Council)
C/O Ian Hunt Associates
Limited
West Berkshire Council
West Berkshire DC
Sara de Barros
Mr Piers Caswell
Planinfo Research Team
Alder King Planning
Consultants
Surrey County Council
Wokingham Borough
Council
Trees
Hampshire County
Council
Royal Borough Of
Windsor And Maidenhead
South Oxfordshire and
Vale of the White Horse
Surrey Heath Borough
Council
Mark Owen Barton
Willmore
Sport England
Israel Lieberman
Amico Design Limited
British Waterways
Canal and River Trust
Chilterns Conservation
Board

Cohanin Architecture
Green Retreats Ltd
HCL Architects
Peacock & Smith
Resi
Richard Clark Chartered
Architects
Savoys Properties
South Oxfordshire DC
SR Signs
Syzygy Consulting
TCB Architecture
The Theatres Trust
Clare Droog Watkin
Jones Group
Wyeth Projects
XMO Strata Ltd
Environment Agency
Planning Additions
Active Travel England
CAMRA
Butterfield Signs Ltd
Global
The Coal Authority
Oxfordshire County
Council
Forestry Commission
HSE Fire Safety
Oxfordshire County
Council
Plans 4 U Ltd
Hart District Council
Test Valley Borough
Council
Tony Clayton
Fast Plans
Peter Asquith
M D Howlett Associates
Ltd
Mr Peter Moran
Archimode Architects
Wokingham Borough
Council (Planning Policy)
Ms Susan Grover
Neville Turner
Mr Colin Lee
Sharmila Perera
Patrick Bingley
David & Jane Eyre
Phil Smith
JWPC Ltd
Alex Jackman EE -
Corporate and Financial
Affairs Department
Frances Hill

Mrs Rosemary Porter
Enliven Solutions Limited
Mr Meyrick Price
Gladman
Dr Rebecca Aylward
Zeman
Provision Planning
Ruth Ponting
Ruth Shaffrey
Blue Architecture Limited
Green Retreats Ltd
Councillor Rachel Eden
Whitley
Mr Craig Round
Hammerson Plc
Mrs Rachel Ruchpaul
Carney Sweeney
Creative Design and
Structure Ltd
Rahul Taheem
Councillor Raj Singh
Mrs Karen Close
RG Butler Associates
Dr Ranald Stuart
Savills
Raymond Bishop
Giles Sutton GS
Ecology
Reading Cycle Campaign
Miss Rachel Blissett-
Lynne
Reading Caribbean
Cultural Group
Ruth Child
Cutler Architects
Broadway Malyan
Kevin Webb
Prospect Estate Agents
Greater Reading
Nepalses Community
Assoc
Reading Real Estate UK
LTD
Reading Sustainability
Centre
Reading Swahili
Speakers
Rowan Read
Rebecca Gibson (BFFC)
RBC Early Years
Eden Verandas
Stantec
Environmental Protection
(Reading Borough
Council)

Rebecca Tappin
 Rebecca Chiazzese
 Russell Chant
 Richard Fenn Designs
 Limited
 Mr Robert O'Neill
 Globe-Lower Caversham
 Ramona Bridgman
 Reading Green Wellbeing
 Network
 Ruth Case
 ECE Planning Limited
 Holder Mathias Architects
 Richard Earle
 Urbanissta
 Richard Davey Design
 Councillor Richard Davies
 Richard and Doreen
 Jones
 Benchmark Planning
 RJ Architectural Design
 RMA Surveyors Limited
 Mr Richard Riley
 Richard Carr Transport
 for London
 Dr Richard Croft
 Katrina Richards
 Rich and Sarah Globe -
 Newtown
 Mr And Mrs R Buzza
 RML Architecture Ltd
 Ricky Chumber
 Mrs Sheila Lines
 RISC
 RJE Planning &
 Developments Ltd
 Ryan Shook
 Bell Cornwell Partnership
 Leary Architecture
 Rob Dunbar
 Bellway Homes (Thames
 Valley) Ltd
 Rob Page
 Councillor Rob White
 AJT Design Services ILtd
 Robert Markus Gyselynck
 & Mya Davis
 Mr Robert Prescott
 Shrimplin Planning &
 Development
 Robert Dimmick
 Flamingos Vintage
 Reading Limited
 Mr Robert Constance
 Robert Sherwood

Robert Mountford
 Robin Akers Ltd
 Peter Robinson
 Robin Thomas
 Robert Mitchell
 Robyn Milliner ET
 Planning
 Easy Home Plans
 Taylor Wimpey West
 London
 Bellway Homes Limited
 (Thames Valley Division)
 Cumming Anderton
 Architects
 Freshwater Group
 Roger Williams
 Roger Ebbett
 R G Fairgrieve
 Ronald Hooper
 Mr Ronald Cutting
 Rupesh Kumar
 Alan Place Residents
 Association
 Hilary & Rosalind Nas
 Rosemary Braine
 Ross Brereton Indigo
 Planning
 Ross Jarvis (RBC) RBC
 Air Quality
 R P Arch Services
 Richard Pearson
 Rosemary Jones
 Mr Ross Thomson
 Ruby Wilkinson
 Image Technique Ltd
 Councillor Ruth McEwan
 Ruth Steggle
 Ruth Brooks
 Ruth Thomas
 Andrew Palarczyk
 S Brown Woolf
 Bond Planning
 Streetspace Ltd
 Ingram Architecture and
 Design
 Cllr Sophia James
 Sarah Judge
 Community Action Ark
 Project
 Steve Watson
 Sara Fulbrook
 Chair Homes Ltd
 St Marks Hospital
 Robin Scott
 Sally Beales

Reading Hydro CBS Ltd
 Sally Roark
 Sally Archer
 Sally Ellis
 SY Design Studio
 Reading Football Club
 Councillor Sam Juthani
 Sam Shean RBC
 Highway & Traffic
 Services
 Montagu Evans LLP
 Dowley & Co. Ltd
 LSD architects
 SRH Architecture
 Zack Design
 Sam Grasshoff
 Sam Harmer
 Dr Samantha Coates
 Samuel Brian
 San Corporation limited
 Mrs Sandie Rimmer
 Sandra Ilsley
 Inhabitat Design Studios
 Ltd
 Roger & Sandra Beavis
 Sara Baker
 Sara Dutfield Turleys
 Thames Valley Surveying
 Councillor Sarah-Jane
 HackerBattle
 Integrated Youth
 Development Service
 Councillor Sarah Magon
 RBC Cllr
 Ms Sarah Waite
 Sarah Horne
 Sarah Gould Architects
 Sarah Nelson
 Sarah Robinson
 Baily Garner
 Brackenwood Windows
 Stephen Cook
 Allen Associates
 Architects Limited
 Left City
 Sara Degortes
 The Royal Society For
 The Protection Of Birds
 RMV Architecture
 Sean Fleming
 Sean Pembroke
 Associates
 Greater Reading
 Environmental Network
 Reading Cycle Campaign

Reading Golf Club Ltd
 Lions Club
 Sarah Eden-Jones
 Mrs S Elston
 Alistair Lloyd Abracad
 Legal
 Mr Sunil Gandhi
 Mr Stephen Gould
 British Islamic Gardens
 Mr Shahid Rafiq
 Ms Sharon Kiely
 Sharon Fitton
 Sharon Oldham
 Tim Sharpe
 SK Design Consultant
 Sheila Harris
 Sheilah Higginson
 Ms S Sheikh
 Shonagh Brunnen
 Sue Blanco White
 Turley
 Sigi Teer
 SA Associates
 Outset Think
 Thames Valley Police
 Mr Simon Ede
 Parkes Poole Architects
 Mr Simon Riley
 Dr Simon Rowe
 Simon Dimmick
 Blandy And
 Blandy
 Simona Kermavnar
 LOM architecture and
 design
 Simone Illger
 S.Gurd Property
 Solutions Ltd
 Simon Elliott Associates
 Simpatico Town Planning
 Simple Plans
 Siobhan Woodgate
 Sara Kopp
 Sarah Roy
 Sarah McCullough
 West Berkshire Council
 Paul Smith
 Dr Andrew Smith
 Design Team (Self
 Employed)
 Stonegate Homes
 (Reading) Ltd
 Ms Sonia Law
 Brinkworth
 Zhuobin He

Miss Charlotte Hopley
 Walsingham Planning
 Sophie Fenwick-Paul
 Crest Nicholson Ltd
 Sustrans
 South Sudanese
 Association in Reading
 Space Create
 Retail Design Solutions
 Colin Calder
 Mr Steve Higgs
 Mr Steve Luckcock
 Globe-Tilehurst
 AJ Plans Ltd
 Mr Ruminder Jutla
 Euro Link Property
 Services
 Bell Cornwell
 Pegasus Planning Group
 Ltd
 P Reynolds
 Caroline Starkey
 Dr S Lauria
 Resonate Interiors
 Stephanie Hendley
 Stephanie O'Callaghan
 Quod
 Stephen Cousins
 Councillor Stephen Goss
 Mr Stephen Young
 Mr Stephen Biddle S
 Biddle Ltd
 Stephen Cox
 S E Tucker And J Calcutt
 Rachael Aberly
 Steve Atkins (SSE) SSE
 Office Principles Ltd
 Hicks Developments Ltd
 Mr Steve Hicks,
 Valuations
 (Environment\Developme
 nt) Flo 3
 Mrs Julie Gould
 Vistry Thames Valley
 MG Signs Limited
 Steve Waite
 P4BA Architecture
 Mr S Kendrick SK-tec Ltd
 VJS Projects Limited
 Julie Hicks
 Stephen Birch
 BHFT
 Stephanie Oldfield
 Mr Ross
 Sylvia Tompkins

Street Care
 Stuart Hylton
 Stuart Ward
 SKDdesign Ltd
 Freeman
 John Taylor Architects
 Ltd
 Matthew T. Young,
 Architects
 STL Architecture Ltd
 Reading Sudanese
 Community
 Sue Lunn
 Bracknell Forest Council
 Sue Ronay
 Susan Tait
 Sung Kang
 Rammurti Design Limited
 Mr Sunil Fernandes
 Cornerstone
 Telecommunications
 Mr S Mangat
 Hualin Sun
 Mr David Elliott
 Planify Limited
 The Children's society
 Mr Surinder Puri
 Ms Susan Knight
 Mrs Susan Johnston
 Susan Spires
 Mrs Susan Alexander
 Mrs Susan Baker
 Mr & Mrs S D'Cruz
 Sustainability Team
 Suzanne and Nick Bailly
 Reverend Suzanne
 Knight
 Homes England
 PRP
 First Home Improvements
 Ltd
 Mr & Mrs A Holland
 Tanya Day
 Miss Tanya Rosenberg
 Mrs Tanya Rae
 Tanya TraynerHarris
 Partnership
 Mrs Tina Barnes
 Icen Projects
 TCS-Engineering
 Isaac Cherrie
 Gladman Developments
 Mr Terry Alway
 Mr Terry Mills
 Terry & Sue Drayton

Mr Hora Tevfik
 Mrs Francis Mitchell
 Robert Cort Properties
 Raglan Housing
 Association
 Thames Water
 Ms Ruth Perkins
 Thebap Rading Ltd
 Sarah Coole
 Trevor Haynes
 Ms Joanna Stewart
 Therese Wicks
 The Way Ministry
 Reading
 Mr Tom Hutchinson
 Wiltshire Council
 Thomas Boyd
 John Heaps
 St Edward Homes
 Tilehurst Allotments
 Society
 Tilehurst Residents and
 Community Association
 Tilehurst GLOBE
 Adonia Architectural Ltd
 Forum Architecture
 Limited
 DTZ Piedad Consulting
 Berkeley St Edwards
 TMP Planning Ltd
 Assael Architecture Ltd
 Tim Cook
 Feilden and Mawson LLP
 4 CAD Services
 David Tingle D.Tingle
 Building Design
 Mr Trevor Keable
 Ridge And Partners
 Tuhin Miah
 Toby Scammell
 Tom Lynch
 Thomas Lake
 Mr Tom Stagles
 Mr Tom Winchester
 Path Design
 Mr Tom Robinson
 Mrs Theresa Robinson
 Emperus Limited
 Tom Evans Globe-
 Tilehurst
 Rolfe Judd Planning
 Mr Thomas Sinclair
 Allen Planning Ltd

Mr Anthony Ford
 ARD Chartered Architect
 Reading Communiy
 Energy Soc
 About Homes Limited
 Mr B Fostekew
 Dr Anthony Goodchild
 BDS Surveyors Limited
 Tony Thorpe
 GBS Architects
 Network Rail Network
 Rail
 UBS Global Asset
 Management (UK) Ltd
 Tracey Essery
 Tonik Associates
 Mrs Tracey Dunk
 Melling Ridgeway and
 Partners Ltd
 Transport
 Caversham Baptist
 Church
 Ayles & Associates
 Mrs Patricia Woodcock
 Kempton Carr Croft
 Tristan Plum
 Lucie Twivey
 Bell Tower Community
 Association
 Giorgi Chitidze
 Amy Unsworth
 Elizabeth Unsworth
 Mrs Azka Desousa
 Mrs Virginia Day
 Reading Enterprise
 Centre
 Susan Sheppard
 Valerie Gardiner
 Ms Veronica Chapman
 Globe-Battle
 Veronica Leeke
 Mrs V Munro
 Victoria Park Community
 Group
 Mr Victor Koroma
 Acre
 Victoria Blades
 H&T Properties Ltd
 Victoria ChaseIndigo
 Planning
 DP9
 VIDi Designers
 Mrs Violet Hurn

Viren Sharma
 Vivien Cunningham
 Vladislava Maskova
 Launchpad Reading
 Ms Vickie Abel
 Vail Williams LLP
 Mr W S G Macphee
 Maskan Architect
 Mr David Warren
 Waste Operations
 The Walking Bus
 Reading Schools
 L Jackson Michael
 Aubrey Partnership
 Limited
 Weijie He Oxford
 Planning at Strutt &
 Parker
 Anthony Warrell
 Councillor Wendy Griffith
 Kathleen Somerville
 Royal Berkshire Fire and
 Rescue
 Broadway Malyan
 Logan Whale
 Anne and Derek White
 Omega Signs
 Tor & Co
 Councillor Will Cross
 Planning Potential Ltd.
 Mr William Bray
 Berkeley St Edward
 Arrow Planning Ltd
 Margaret Wilson
 FPD Savills
 SGN plc
 Women's Concerns
 Mrs Pamela Webb
 Chi-kwong David Lau
 Woodridge Deisgn
 Louize Bovey
 South East Water
 R May
 Yann Guillet
 RPS
 Yoyo Ting Yiu Dixon
 Mr M Zamir
 Zenoida Ustinov
 Zoe Lewis Architects Ltd
 Zoe Brown
 Mr Mohammad Zaheer
 Zamir

Appendix 2: Consultation Email Text

Reading Borough Local Plan – chance to comment on the Local Plan Pre-Submission Draft Partial Update, November 2024 (Regulation 19)

Reading Borough Council is now consulting on the Local Plan Pre-Submission Draft Partial Update, November 2024 until 18th December 2024.

The Local Plan is a crucial Council planning document which will help inform decisions on planning applications up to 2041. The existing Local Plan was adopted in November 2019. We are in the process of updating the Local Plan to take account of recent changes to legislation, address the urgent need for more homes (including affordable homes), plan for associated infrastructure and ensure that sustainable development will help Reading achieve its net zero carbon ambitions. Once adopted, the Local Plan will be the main document that informs how planning applications are determined and covers a wide variety of strategic matters, policies and specific sites for development.

We are seeking comments until the 18th December 2024 during a period of public consultation. The Local Plan Pre-Submission Draft Partial Update document and supporting documents are on the Council's website at: <http://www.reading.gov.uk/localplanupdate>. Hard copies of the main documents can also be viewed at the Civic Offices, Bridge Street, Reading, RG1 2LU (between 9 am and 5 pm on weekdays) and in all Council libraries (during normal opening hours).

We welcome any comments that you have. Please provide written responses to the consultation by 5 p.m. on Wednesday 18th December 2024. You may complete the [online questionnaire](#) to answer specific questions. Alternatively, you may respond more generally in writing by email or post. A model representation form is attached. These responses should be sent to: planningpolicy@reading.gov.uk or Planning Policy Team, Reading Borough Council, Civic Offices, Bridge Street, RG1 2LU.

You may also wish to attend one of our drop-in events to talk about the Local Plan to a planning officer in more detail. There is no need to let us know if you wish to attend beforehand. These will be held at the Civic Offices, Bridge Street, RG1 2LU in main reception on Tuesday 26th November from 13:00 to 18:00 and Wednesday 11th December from 14:30 to 19:30.

At this stage, representations should focus on whether the plan is legally compliant, fulfils the duty to co-operate and meets the 'tests of soundness', as set out in paragraph 35 of the National Planning Policy Framework (NPPF). Following the public consultation, officers will take some time to consider the public's feedback before the Local Plan is to be submitted to the Secretary of State for examination.

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

Regards,

Planning Policy Team

Appendix 3: Council's Press Release

[Final Chance to Have Your Say on Reading's Local Plan | Reading Borough Council News](#)

Final Chance to Have Your Say on Reading's Local Plan

- **Last chance for the public to have their say on Reading's refreshed Local Plan before it goes to the Secretary of State for approval next year**
- **People can feedback at www.reading.gov.uk/localplanupdate**

THE final round of public consultation on a refreshed planning blueprint for Reading up to 2041 is now open.

Reading's Local Plan is a crucial Council planning document which will help inform decisions on planning applications over the next 17 years. It outlines Council policies on key issues like future housing need, affordable homes, associated infrastructure, and how sustainable developments will help Reading drive towards its net zero carbon ambitions. Reading Council is updating the Local Plan to make sure it is fit for purpose for the future.

Following a previous phase of public consultation last year, residents, businesses and local organisations now have a final opportunity to input into the Local Plan before a final draft goes on to the Secretary of State for approval next year. A public examination led by an independent inspector will also follow during 2025.

People can have their say online at www.reading.gov.uk/localplanupdate.

The Council is additionally hosting two drop-in sessions where planners will be on hand to answer any questions. These will take place at the Civic Offices on Tuesday 26 November, between 13:00 and 18:00, and Wednesday 11 December between 14:30 and 19:30. The deadline for comments is December 18.

Adopted five years ago in 2019, Reading's Local Plan has been updated through consultation to consider changes in national planning legislation and the need for more homes to tackle a national housing shortage, which is exacerbated by the high cost-of-living.

Every council needs to review its Local Plan by law within five years of adoption and, as a result of this review, the Council has decided to undertake what is known as a 'partial update'.

Locally in Reading, there is a specific focus on more affordable homes, more family-sized homes and more energy efficient housing. In relation to the level of housing need in Reading borough, the adopted Local Plan provides for 825 new homes a year.

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

The consultation document also includes additional sites for development for a variety of uses, but particularly for housing.



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

"This is the final opportunity for people to feedback on what is a key document for our town which will have a material impact on how it looks and develops up to 2041.

"Changes have been made from the previous version, including a substantial increase in the creation of family-sized homes by developers outside of Central Reading. It also continues to demand high standards from developers in terms of creating

genuinely sustainable and energy efficient homes, which also help to drive down costs for struggling households.

"Aside from steering the type of development the town needs, it is also important to say that the Local Plan plays a key role in the protection of land and changes in national law and policy which mean that greater protection must also be afforded to biodiversity, wildlife and existing habitats.

"I'd urge residents, businesses and organisations across Reading to take some time over the coming weeks to take a look at our intended direction of travel and feed into our town's Local Plan."

Appendix 4: Press Articles

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

[Residents invited to have their say for final time on council's local plan – Reading Today Online](#)

[Have your say on Reading masterplan for thousands of new homes | Reading Chronicle](#)

Appendix 5: Exhibition Boards for Drop-In Events



Welcome to the Local Plan Partial Update Consultation

*Have Your Say on the future
development of Reading*

Local Plan Pre-Submission
Draft Consultation

   @ReadingCouncil
reading.gov.uk/localplanupdate



Local Plan Consultation

Where We Are in the Process



We are at the third stage of the process: the *Pre-Submission Draft* consultation. This document sets out the draft wording for the proposed policy updates including housing numbers per year and sites that have been put forward for development in response to the 'Call for Sites' exercise held earlier this year.

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

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



What is this consultation about?

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

The Local Plan includes all of the planning policies for Reading, and deals with how much development there should be, where it should be, what form it should take, and what should be protected from development. The Partial Update would update about half of the policies in the plan.

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

Some of the headlines are:

- Planning for 825 new homes per year;
- Updates on the type of affordable housing to meet latest needs;
- A 10% mandatory biodiversity net gain on development sites;
- Greater provision of family-sized dwellings across the borough;
- Strengthening policies that deal with climate change mitigation, for example, provision of low and no carbon energy sources for new development;
- New policies on co-living, health impact assessments and urban greening
- Identifying what key pieces of strategic infrastructure will be required up until 2041 to accommodate for planned growth; and
- Delivering office, retail and industrial use based on up-to-date data.

How can I get involved?



The consultation runs until Wednesday 18th December 2024. We welcome any comments that you have.

You can respond at the link below:

www.reading.gov.uk/localplanupdate

You do not need to answer every question.

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

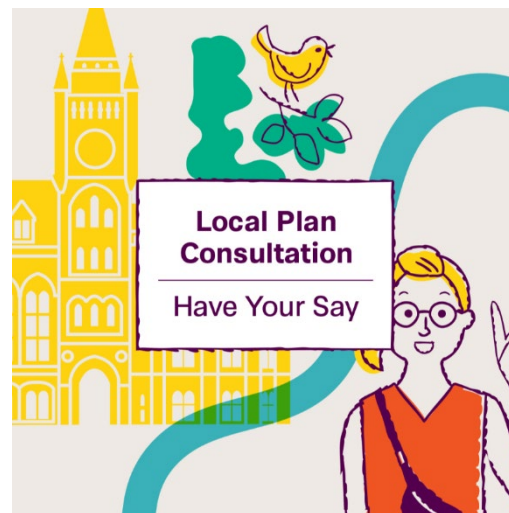
planningpolicy@reading.gov.uk

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

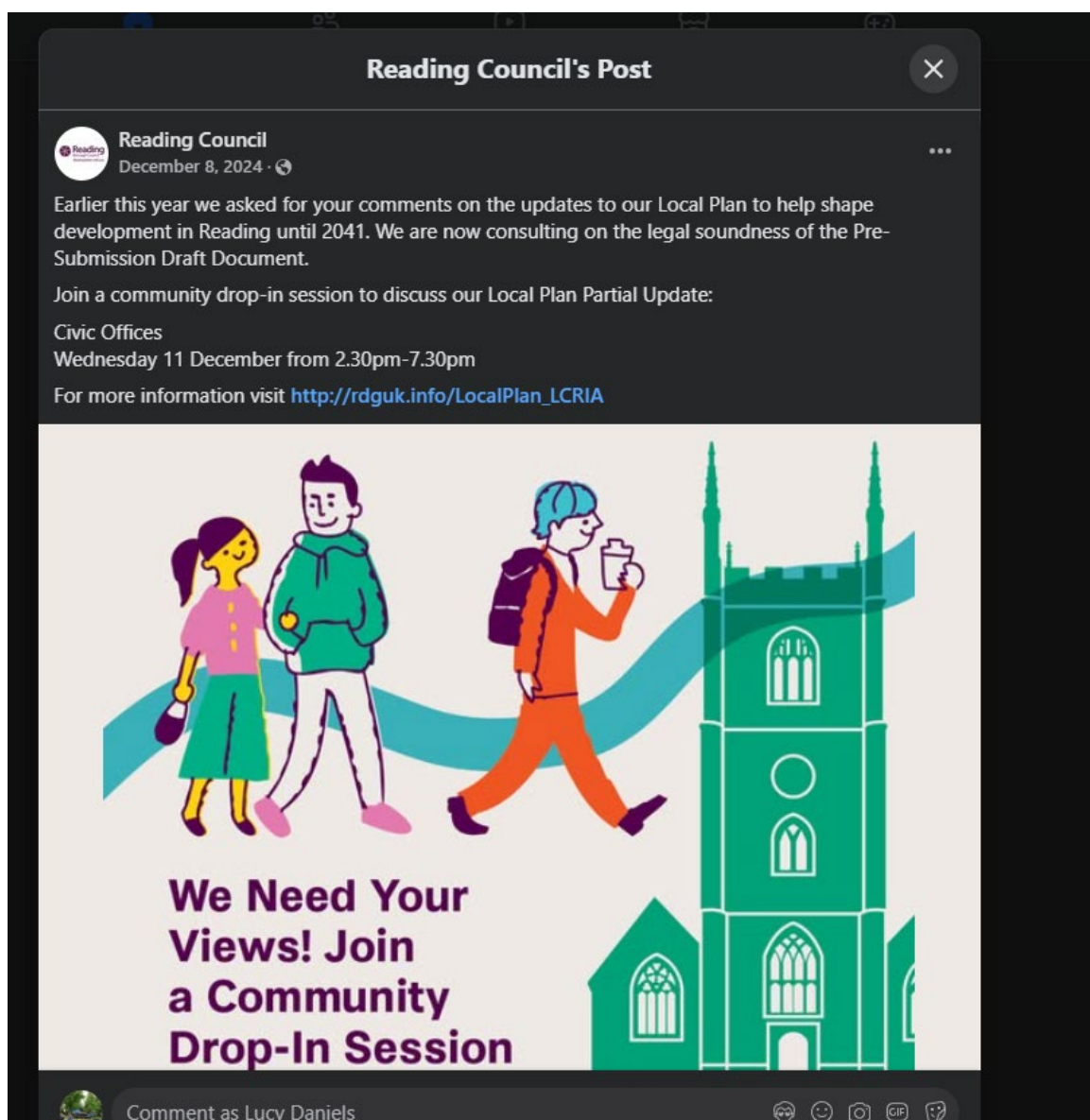


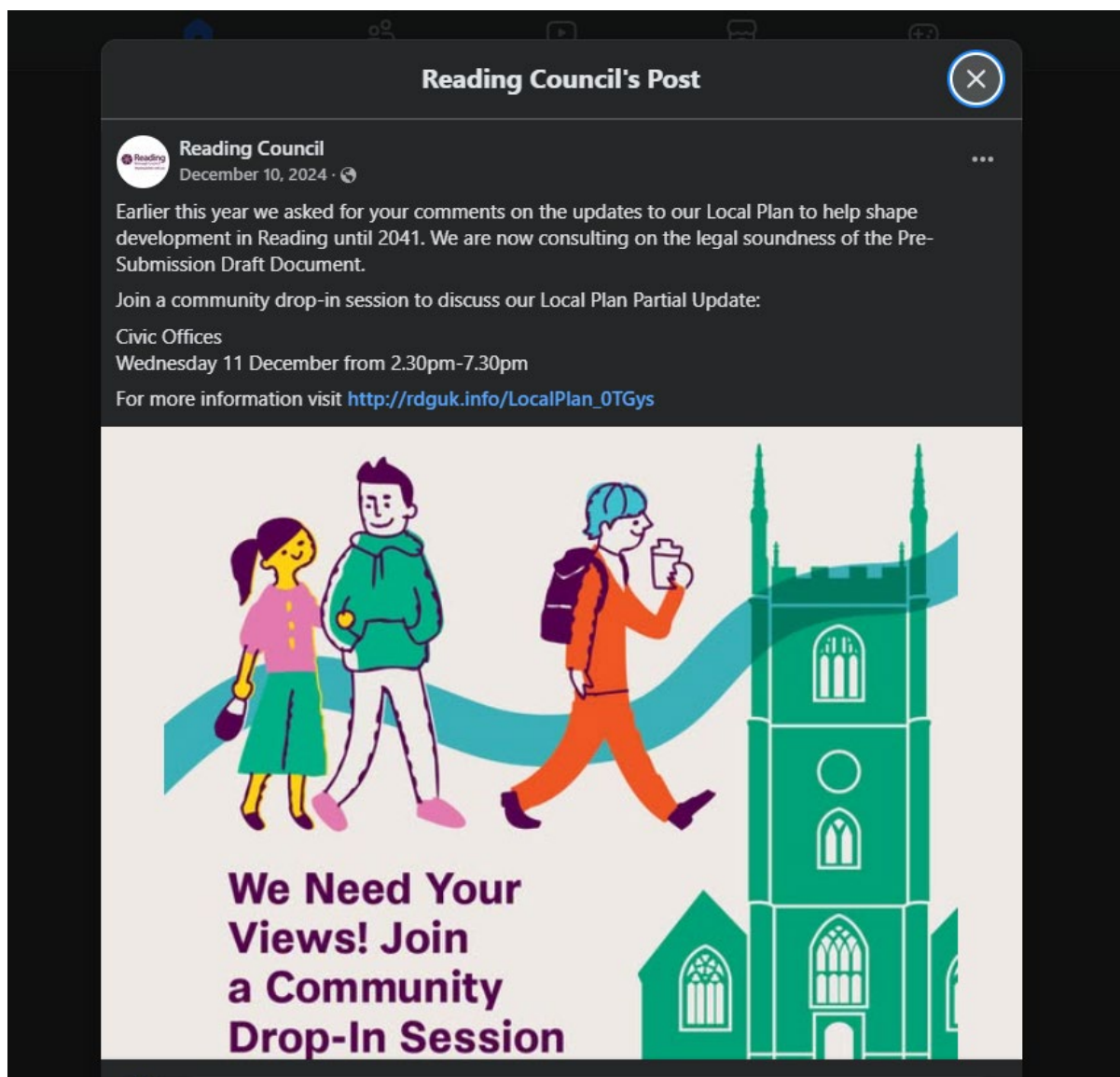


Appendix 6: Social Media Assets



Appendix 7: Selection of Social Media Posts





Appendix 8: Consultation Responses

The following pages list each response to the online questionnaire and representations submitted via email/post. Many of the comments have been summarised. It also includes the officer response to these comments. The full responses are available as part of the evidence base.

Generally, this appendix is categorised such that each representation is categorised in order of the policies contained within the Pre-Submission Draft. As such, some representations received which provide comments on various policies have been separated for the sake of consistency. A table at the beginning of this section contains general comments that do not relate to any specific topic, question or policy, which were received by email/post.

General comments

Respondent	Comments	RBC Officer Response
Natural England	Natural England has no further comments to make on the REG 19 Local Plan. After commenting on specific matters at the Regulation 18 stage, Natural England are satisfied that these comments have been addressed in this version of the local plan.	Noted. No change required.
DP9 Ltd on behalf of SH Reading Master LLP	<p>We support the renewed vision of the draft Local Plan that continues to encourage regeneration and deliver the uses and needs of Reading, particularly the Town Centre. We note that the revised NPPF was adopted in December 2024 and sets out increased housing targets for Reading. It also further emphasises the importance of optimising the use of brownfield land for new homes. It is noted and supported that the draft updated Local Plan seeks to update the housing target to align with the new standard methodology for housing need published in December 2024, which highlights a need for 825 homes per year.</p> <p>It should be noted that the outline planning consent at Station Hill allows for up to 750 new residential homes to be delivered within Phase 3, and we look forward to bringing forward the residential Reserved Matters applications in 2025. It is important that the draft Site Allocation fully allows for up to 750 residential to be delivered.</p> <p>We further emphasise that any new requirements introduced by the updated Local Plan should apply only to new full applications submitted after the plan's adoption and should not be retrospectively applied to Reserved Matters Applications being brought forward under existing outline consents. This ensures certainty for developments already in progress while maintaining alignment with established planning principles.</p>	No change required. Reserved matters will be considered in line with the principles in the existing outline as is usual practice.
The Warren and District Residents Association (WADRA)	<p>We are very concerned at the very large number of apartments being constructed and planned for the near future in Reading, without the necessary infrastructure, such as doctors surgeries and health centres to support this being incorporated into the plans.</p> <p>Additionally these additional homes will undoubtedly significantly increase the population and this in turn will have severe implications for traffic movements across the Town.</p>	Noted. No change proposed. Policy CC9 seeks to ensure that development is required to contribute to infrastructure provision. Additionally, many site allocations specifically require the consideration of establishing doctors surgeries on-site, for instance. The

		vehicle trips generated by new development have been modelled through a full transport assessment and applicants will be required to mitigate effects. Moreover, the policies in the Local Plan emphasise the importance of active transport and public transport to help reduce congestion within the town.
Mrs Rebecca Lagden	<p>20.(d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.</p> <p>Destroying the local natural environment, it's wildlife (flora and fauna) does not show that RBC is addressing the loss of wildlife and the potential impact to the area. With climate change being such an important issue, RBC has a duty of care to all current residents and future residents. Once destroyed this cannot be replaced. There are many species at risk and this is not something the local residents want.</p> <p>RBC claims to be committed to conservation and protection yet is considering allowing this to be irreversibly ruined for future generations.</p>	No change proposed. Policies within the Local Plan, particularly EN12: Biodiversity, as well as national legislation regarding Biodiversity Net Gain will ensure that impacts on flora and fauna are mitigated, and where possible, biodiversity is enhanced on development sites. The vast majority of development proposed is on previously developed land.
Miss Sara Fulbrook	<p>there is very little local consultation rather than this option to rubber stamp council ideas. actually ask residents to input their opinions in proper localised consults.</p> <p>Transport -- In particular the terrible disjointed access to the bus network. Years ago we were promised that once the station had been upgraded the public space would be returned. However it has been sold off to private developers. The allocated public space is now part of a private development. The links between bus routes is dire as a disabled person who has to visit hospital a lot I find it difficult to walk to the nearest hospital stops. Most modern large towns cities have transport service hub at the station, not spread out over a large part of the train centres is no</p> <p>There has been zero consultations with residents prior to the draft plan being set up either with individuals or stakeholders which lead to the disastrous 1 way system in Caversham. In particular there is a lack of crossings in Caversham that discourages active travel Peppard Road is the worst.</p>	<p>At this stage (Regulation 19), the scope of the consultation is more narrow when compared with earlier stages and asks for residents' views on proposed policy language. Consultation on issues and various options was held in 2023.</p> <p>It is unclear what change is requested with regard to the transport interchange at the station.</p> <p>There has been previous consultation during the Local Plan Partial Update and Regulation 18 stage with corresponding events online and in person. A one way</p>

	<p>I don't feel that the voice of older or residents who rely on public transport due to lack of mobility is considered. Or that Reading is properly addressing pollution and air quality. Reading is in favour of cars over pedestrians particularly North of the river. They also fail to address any conflict between cyclists and pedestrians on shared paths.</p>	<p>system within Caversham is not within the scope of the Local Plan.</p> <p>The importance of addressing pollution, air quality and prioritising the mobility of older residents is noted. Policies within the Local Plan with regard to design, air quality and transport seek to address these issues. Each application will be considered on a case-by-case basis and opportunities for improvement will be considered. Addressing conflict between cyclists and pedestrians is not within the scope of the Local Plan.</p>
<p>AWE plc and AWE plc on behalf of the Ministry of Defence (MOD)</p>	<p>AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) welcome the references throughout the plan to the importance of protecting public safety and the acknowledgment of the importance of the AWE sites to the delivery of defence capabilities. The plan has clearly taken account of these constraints within the spatial strategy and AWE and MOD endorses and supports the approach not to allocate any new residential development sites within the Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield. The MOD does have concerns about allocations for non-residential development within the DEPZ. Representations are made in respect of these policies. The inclusion of policy OU2 is also supported, subject to suggested amendments set out in further representations.</p> <p>The strength of the plan is founded upon extensive discussion between all the parties affected by and with interests in the derivation and management of the DEPZ. For these reasons the MOD and AWE are supportive of the overall plan but there are certain parts of the relevant policies that are not as effective in terms of providing clarity and certainty as they should be and therefore potentially unsound. AWE and the MOD have, therefore made some relatively limited amendments which if adopted would render the plan sound.</p>	<p>Noted. AWE's specific comments are dealt with below.</p>
<p>Surrey County Council</p>	<p>The MWPA have no comments to make at this stage.</p>	<p>Noted. No change required.</p>
<p>Helen Goodchild</p>	<p>With the greatest respect, is there any point giving an opinion as 4500 objected to the Reading Golf Course development, they cut down loads of trees (not very carbon neutral), there will be a high increase in cars in an already pollution high Caversham.</p>	<p>Consultation on development sites is not a vote, rather an opportunity for members of the public to highlight</p>

		planning matters for the consideration of officers. As development has occurred on the site, this is not within the scope of the Local Plan Partial Update.
--	--	---

Comments on specific sections of the plan

Respondent name	Section of the plan	Comments	RBC Officer Response
Gladman	Section 2: Vision and Objectives	<p>RBC are proposing a plan period of 2023 to 2041. The NPPF suggests that strategic policies should look forward over 15 years from the date of adoption. The Council currently aim to adopt the plan in October 2025 this would allow for a 16 year plan period from the point of adoption. The timescales for adoption are currently optimistic, the Council should consider extending the plan period the timescale to allow for any delay within the adoption in the plan.</p> <p>The HELAA, which assesses the housing capacity uses a base date of 1st April 2024, and at the land availability going forward. The Council should consider amending the plan period to reflect the base date of 2024.</p> <p>Gladman recommends the following policy wording based upon the Bedford Local Plan review policy is inserted into the plan to ensure that the plan remains up to date and in line with national policy.</p> <p><i>Policy XX: Reviewing the Local Plan Update</i> <i>The Council will undertake an immediate review of the Local Plan Update. An updated plan will be submitted for examination no later than 30 months after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies relating to the supply of land will be deemed out of date in accordance with paragraph 11d) of the National Planning Policy Framework. The reviewed plan will secure levels of growth that accord with the Standard Method and any growth deals that have been agreed.</i></p>	<p>No change. The LDS has been amended to reflect an adoption date towards the end of 2025. Even if the plan were adopted in 2026, this would still meet the requirement to plan for 15 years from adoption.</p> <p>There would be no particular benefits in amending the base date to 2024, as the 2023-24 completions are already taken into account in the HELAA, and doing so would require the evidence to be refreshed.</p> <p>It is not clear why an immediate review would be required.</p>
University of Reading	Section 2: Vision and Objectives	RBC and the University have organisational commitments and action plans to achieve net zero carbon by 2030. Therefore, the University supports the changes to the vision and objectives, as they are aligned with existing Plans and Strategies.	Noted. No change required.
Reading Conservation Area Advisory Committee	Section 2.1: Vision	On page 14 we are described as Conservation Area ACTION Committee when we are the READING Conservation Area ADVISORY Committee.	Noted, but no change required. This change was made previously following the Reg 18 consultation.

Helen Kemp	Section 3: Spatial Strategy	Totally understand the need to provide more housing, but one would hope it would be considered and empathetic not cramming new developments into already densely populated areas such as the Oxford Road. It seems that Reading Borough Council is determined to turn Reading into a dormitory town, which serves commuters from Monday to Friday with these same commuters going elsewhere at the weekends because the town offered so little in the way of enjoyment for leisure such as culture and entertainment.	No change proposed. Intensification of existing brownfield sites near transport nodes is considered to be the most efficient use of land and is in line with national policy. This aims to address the significant need for homes within the Borough and to make homes more affordable. Policies within the Local Plan aim to increase the leisure offer of the town.
Stantec on behalf of St Edwards Homes Limited	Section 3: Spatial Strategy	We support the continued reference within the Spatial Strategy to South Reading as a location for meeting much of the development needs other than those provided for in Central Reading, as set out at paragraph 3.2.1 of the consultation document. South Reading presents opportunities for highly sustainable development which benefits from connectivity to Central Reading and the wider area via a range of sustainable modes including train and bus.	Noted. No change required.
Wokingham Borough Council	Section 3: Spatial Strategy Section 3: Spatial Strategy Para 3.1.3	WBC suggest paragraph 3.1.3 is modified to remove reference to the South of the M4 Strategic Development Location. This is currently referenced as being of particular significance to Reading Borough, however at 1 April 2024, only 138 dwellings had not been completed. At least a further 10 dwellings have been completed in the period since. Given the limited scale of remaining completions and the modest development proposed in the area under the Wokingham Borough Council Local Plan Update Proposed Submission Plan (circa 360 dwellings), WBC do not believe the SDL is of particular cross boundary significance that justifies reference in the Plan. As you will be aware, the SDL allocation is not carried forward in the Wokingham Borough Council Local Plan Update Proposed Submission Plan due to its advanced stage of delivery. It is accepted that the Loddon Valley Garden Village proposal is of significance and should be referenced.	Change proposed to modify the reference to remove “particular significance” and to highlight recent completions. Language remains to emphasise the importance of infrastructure improvements.
Wokingham Borough Council	Section 3: Spatial Strategy Figure 3.1	WBC do not object to Figure 3.1 but note that whilst the AWE Detailed Emergency Planning Zone is shown, the associated supporting text does not include reference. Given the AWE DEPZ has not been referred to in the Plan up to this point, it is suggested that a brief explanation is added to preceding text to assist the reader.	Agreed. Change proposed to refer to the DEPZ in the supporting text.
Wokingham Borough Council	Section 3: Spatial Strategy	WBC suggests that Figure 3.2 is modified to remove the South of the M4 Strategic Development Location for the reasons referred to in the response to paragraph 3.1.3	See previous comment

	Figure 3.2		
Wokingham Borough Council	Section 3: Spatial Strategy Para 3.2.12	<p>WBC suggest paragraph 3.2.12 is modified to remove reference to the South of the M4 Strategic Development Location for the reasons set out above in response to paragraph 3.1.3.</p> <p>It is accepted that the Loddon Valley Garden Village proposal is of significance and should be referenced within the paragraph text. Notwithstanding, the text referring to Reading inevitably being the main town the development will rely on for higher order infrastructure is unclear.</p> <p>Whilst WBC accepts that Reading town centre is a higher order centre for comparison retail, the Loddon Valley Garden Village will include primary schools, a secondary school and a district centre, and is in proximity to key employment destinations within Wokingham Borough. There are also a number of conveniently located supermarkets within Wokingham Borough to support more local food shopping, the likely use of which by residents is supported by retail survey information.</p>	<p>It is considered that the South of the M4 SDL is appropriately labelled as being partly complete in the key. It is also the case that parts of the Major Opportunity Areas within Reading are also now complete, but they continue to be shown on the map.</p> <p>No change proposed. RBC strongly believes that LVGV will rely on Reading for certain high order services and facilities, including some retail but also major transport connections, and this reference should be retained. RBC will continue to work closely with WBC and welcomes the commitment to providing local services within the Loddon Valley GV. The higher order</p>
Berkshire Gardens Trust	Section 4: Built and Natural Environment	Figure 4.1 omits to plot the five Registered parks and gardens in Reading. These are of national significance and make a key contribution to the historic value of Reading. They are more significant than the title 'former parks and estates' already plotted. The plotting of some non registered parks and estates is however welcomed.	No change proposed. The purpose of the map is to give a broad overview of this historic context not to map existing heritage assets. Registered parks and gardens are shown on the Proposals Map.
Historic England	Section 4: Built and Natural Environment Para 4.2.10, 4.2.11	<p>We suggest amending terminology to Scheduled Monuments to align with the NPPF.</p> <p>Also, we suggest referring to Registered Parks and Gardens (RPGs) when that is meant rather than historic parks that are not on the national register.</p>	<p>Minor change accepted to refer to Scheduled Monuments.</p> <p>Minor change accepted to refer to Registered Park and Gardens.</p>
Historic England	Section 4.2: Built and Natural Environment	We recommend amending the title of this section to align with paragraph 8 of the NPPF and recognise that the built environment is not synonymous with the historic environment. "Built, Historic and Natural Environment"	No change proposed. It is unclear what additional benefit this change would bring.

DP9 Ltd on behalf of SH Reading Master LLP	CC2	<p>The hybrid planning application for Station Hill was extensively and robustly tested by both Reading Borough Council and the applicant during the determination of the application. The associated Section 106 agreement secured the approach to Carbon offsetting and the relevant calculation with a specified formula within the Agreement. The draft policy should be updated to clarify that the requirements will only apply to new detailed planning applications.</p> <p>The hybrid planning consent secured the principle for demolition. The draft policy text should again confirm that the requirement only applies to new detailed planning applications.</p>	No change proposed. This is already the case.
Friends of the Earth	CC2	<p>We expect many developments – particularly in multi-storey buildings and dense developments favoured to optimise land-use and transport hubs – will be unable to generate enough solar electricity on-site to meet the ‘net zero’ policy aim. So the policy should be revised with more detail of how this aim – to fund development of renewable electricity supply - can be achieved in practice.</p> <p>The requirement to address energy demand for heating in terms of kWh/m²/year could be refined in the interest of optimising insulation and therefore minimising emissions. Heat loss occurs through floors, ceilings and walls so will be less in e.g. a multi-storey block than in a single-storey structure with the same floor area. So the former may be tempted to reduce wall insulation while keeping within the limit when it could achieve better performance than the limit by better wall insulation, probably at little extra cost.</p> <p>Requirement for embodied carbon assessment should be altered to require a 3000m2 lower limit for an embodied carbon assessment and a lower limit for embodied carbon.</p> <p>Criteria must be very strictly set and enforced. Alternative uses for the site must be investigated. Must not allow developments where future running demand for energy leading to carbon emissions will continue for decades.</p> <p>Would like it explained how the financial contribution to the LPA will be calculated given future uncertainties on carbon pricing and electricity pricing.</p> <p>BREEAM is not an appropriate measure because high scores can be obtained for relatively energy- and carbon-intensive developments. (See 4.1.3 in the document).</p> <p>Ideally financial contributions as an alternative should be removed (or a ‘last resort’) as developers are said to exploit this type of mechanism to erect buildings that will continue to require high energy use – ‘fabric first’ must be the way forward. Connection to a heat</p>	<p>Noted. No change proposed. It is considered that setting a requirement without specifying how this must be achieved will provide flexibility and ensure viability of schemes.</p> <p>Noted. No change proposed. The policy clearly states a fabric first approach. Moreover, it would be extremely difficult for applicants to achieve the required figures without particular attention to insulation.</p> <p>No change proposed. The figure used is a nationally recognised figure considered to be best practice among Local Authorities.</p> <p>Noted. The policy seeks to give development management officers to tools to require the most ambitious energy efficiency standards.</p> <p>It is considered that an overly specific charging regime would not be properly future-proofed. The financial contribution must be “equivalent to at least offsetting the additional energy requirements.” This allows for changes in technologies and costs.</p>

		<p>network does not automatically provide compliance with a net-zero requirement and should still require total offset.</p> <p>As such it is recommended that the exceptional basis clause is altered so all options are required rather than only one option of the three (without LPA finance as an option).</p> <p>Use and waste of perfluorinated alkyl substances (PFAS) should be prohibited with zero tolerance since alternatives are available and can be required in all refurbishments and new builds. See CC5 for more discussion).</p>	<p>Noted. BREEAM or other certification method will only be pursued under the exceptional basis clause (where requirements cannot be met due to technical or viability reasons).</p> <p>No change proposed. By omitting financial contributions as an option under exceptional circumstances, development could be unviable.</p> <p>It is considered that prohibiting the use of specific substances is not within the scope of the Local Plan.</p>
Home Builders Federation	CC2	<p>This policy will require new housing to achieve net zero. This is defined as a scenario where the quantity of anthropogenic greenhouse gas emissions arising from energy use on an annual basis is zero or negative. The HBF recognise that the Planning and Energy Act 2008 allows Council's to set standards that exceed the energy requirements of building regulations. However, the Written Ministerial Statement from December 2023 requires such policies to be framed on the basis of Building Regulations and use the Target Emission Rate and this need to be reflected in CC2 to ensure consistency with national policy, HBF would recommend that the policy amended to read:</p> <p>“... to achieve net-zero development as assessed using the Target Emission Rate as specified in the Standard Assessment Procedure. defined as “a scenario in which the quantity of anthropogenic greenhouse gas emissions arising from the development's operational energy use on an annual basis is zero or negative, and where whole life emissions are reduced through sustainable design measures.”</p>	<p>No change proposed. It is considered that the WMS is subservient to statute and that Local Plans are required under the Climate Change Act 2008 to address climate change. The proposed approach represents the adopted approach of many other Local Planning Authorities and aims to help meet Reading's ambitious 2030 Net Zero target. The policies proposed do not seek to duplicate the Building Regulations. Continued reliance on Target Emissions Rate (TER) results in a performance gap and will continue to contribute to climate emissions within the Borough. The requirements of the policy have been tested for impacts of viability and are considered to be deliverable.</p>
John Sharpe	CC2	<p>Refers to LETI Climate Emergency Retrofit Guide - which is very good advice. To practically assist property owners, It would be useful if there was a commitment to helping residents to adopt the principles in this guide, through the development of a local advice service like Carbon Co-op in Manchester or Cosy Homes in Oxfordshire.</p>	<p>No change proposed. This is not within the scope of the Local Plan Partial Update.</p>

<p>Lichfields on behalf of Mapletree Investments Pte Limited</p>	<p>CC2</p>	<p>Whilst supportive of the ambitions of the Regulation 19 draft their experience of development schemes means that they are aware that there will be some types of development proposals where not all criteria will be achievable under the current requirements identified.</p> <p>As a formatting point and for ease of reference, it is suggested that the multiple requirements set out under policy CC2 are allocated to a specified criteria (i.e. number or letter), as has been done for other policies in the plan (such as Policy H5: Standards for New Housing). For now, these representations refer to the main 'items' set out in Policy CC2.</p> <p>They generally support Policy CC2's 'Exceptional basis clause' which states that "where the above points cannot be met for technical, viability or other policy reasons (such as heritage), the highest possible standards are required. In these cases, an applicant must demonstrate the extent to which the requirements can be met." However, they consider that (i) the word "feasibility" should be added to this clause to recognise the wider circumstances and for consistency with the wording of draft Policy CC3.</p> <p>Finally, as drafted Policy CC2 requires the demolition of existing buildings to be "accompanied by a full justification for demolition and demonstrate how 95% of all construction waste will be diverted away from landfill..." This requirement is very high, and it is not clear where this percentage has been sourced, as no technical standards have been referred to in the policy. For technical and good practice standards, the EU Taxonomy is often used as a classification framework designed to determine whether an economic activity is environmentally sustainable. Specifically, when examining the climate change mitigation objective within the Technical Screening Criteria for the economic activities 'Construction of new buildings' and 'Renovation of existing building,' it sets the following requirement for waste: "At least 70% (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material) generated on site is prepared for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials." Although the UK has now left the EU the EU Taxonomy still sets a mechanism for assessing good practice in a context where the LPPU does not identify a technical source for the 95 % figure. To ensure the policy is more aligned and consistent with industry standards, Mapletree suggest that the percentage is reduced from 95% to at least 70%.</p>	<p>Noted. No change proposed. This is the purpose of the exceptional basis clause.</p> <p>No change proposed. It is unclear what benefit alternative formatting would provide.</p> <p>No change proposed. It is unclear what additional benefit would be afforded by the word "feasible."</p> <p>This figure is the adopted policy of the Greater London Authority and is recognised by the UK Green Building Council. Change proposed to include footnote containing technical reference.</p>
--	------------	---	--

Lichfields on behalf of USS Investment Management Limited	CC2	The current wording of policies CR14t and CR14u accommodates the site's development and demolition of the existing building(s). Policy CC2 should be amended to clarify that the requirement for 'full justification for demolition' should not apply where a site's development is allocated by another policy in the Plan, such as Policies CR14t and CR14u.	Change proposed to clarify that presumption against demolition will not apply to sites allocated within the Plan.
Stantec on behalf of SEGRO plc	CC2	<p>The Council will be aware of the Written Ministerial Statement entitled '<i>Planning – Local Energy Efficiency Standards Update</i>' dated 13th December 2023 ('the WMS'). This WMS was subject a legal challenge on several grounds, but primarily that the WMS unlawfully sought to restrict local planning authorities of their statutory powers (specifically the ability to set policies in their development plans seeking energy efficiency standards which exceed building regulations, as allowed by the Planning and Energy Act 2008). This challenge which was dismissed at the High Court in June 2024 in <i>R (Rights Community Action) v Secretary of State for Levelling Up, Housing And Communities [2024] EWHC 1693 (Admin)</i>. This Judgment provides helpful clarification that the Written Ministerial Statement does not prevent local authorities proposing local energy efficiency standards that go beyond current planned building regulations as long as they present a well-reasoned and robustly costed rationale that ensures development remains viable. The Council have not provided a viability assessment of the amendment to this Policy and in accordance with this Written Ministerial Statement the Council should not be proposing local energy efficiency standards for buildings that go beyond current or planned buildings regulations.</p> <p>Based on the above, for the policy to be considered to be 'justified' and 'consistent with national policy' in accordance with NPPF paragraphs 35(b) and 35(d), the policy should be revised so that the requirement for development to be net zero is aspirational. This change would not prevent net zero development from coming forward, but also ensures that development remains viable and aligns with the prevailing government-led standard.</p> <p>SEGRO consider that it is beyond the scope of planning policies to prescribe specific Building Regulations that development must comply with. There are many ways for a non-residential building to be designed to be water efficient beyond just the 'fittings approach' and consider that the policy should be amended to reflect this reality, particularly as it will not be a feasible requirement for all developments.</p>	<p>The Viability Assessment has been completed and determines that the requirements of the policy do not detrimentally affect viability. In case where requirements would render development unviable, the exceptional basis clause intends to provide flexibility in order to enable development while ensuring the highest energy efficiency standards possible. This approach reflects the adopted policy approach of many other Local Authorities (such as Central Lincolnshire and Cornwall) and is considered to be a critical tool to fulfilling the Council's legal duty under the Climate Change Act 2008 to address and mitigate the effects of climate change.</p> <p>No change proposed. An aspirational net zero policy would result in dwellings that continue to contribute to carbon emissions within the Borough and create the need to for costly retrofit in the future.</p> <p>No change proposed. The 'fittings approach' is specifically outlined in the Building Regulations for water-stressed areas (which Reading is</p>

		<p>For the policy to be considered to be 'justified' and 'consistent with national policy' in accordance with NPPF paragraphs 35(b) and 35(d), the policy should remove the requirement for non-residential development to comply with specific Building Regulations.</p> <p>SEGRO support the requirement for major development to meet BREEAM 'Excellent', but would be concerned if this was only 'Outstanding'. This is currently difficult to achieve. The requirement is an 'or' and therefore we do not object to this wording.</p> <p>SEGRO support the flexibility provided by the exceptional basis clause which states that in cases where the points in Policy CC2 cannot be met, the highest possible standards are required. For clarity, SEGRO request that the wording of this clause is amended to reflect that the highest realistic standards are required, as the highest possible standard implies that the technical, viability or other policy reasons for not meeting the points are not taken into consideration when assessing whether these standards have been met.</p>	<p>within) and the policy has been drafted cooperatively with Thames Water.</p> <p>Noted. No change required.</p> <p>No change proposed. It is unclear what additional benefit the word "realistic" would bring. The policy clearly states that technical, viability or other policy reasons will be taken into consideration.</p>
Thames Water	CC2	<p>We support the amendments to Policy CC2 in relation to water efficiency as they are in line with our previous response.</p> <p>It is our understanding that the water efficiency standards of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.</p> <p>We therefore support the amendments to Policy CC2 in relation to water efficiency as they are in line with our previous response.</p>	Noted. No change proposed.
University of Reading	CC2	<p>The draft policy now requires design to be water efficient, as opposed to achieving water neutrality as previously proposed. Proposals that achieve water neutrality will be particularly supported. A footnote has been added to clarify 'water neutrality' as that where</p>	Noted. No change required.

	<p>the demand on the public water supply is the same after development as it was before'. This amendment is in line with the University's earlier response and is supported.</p> <p>The University considers that there is a need to create a single policy dealing with operational energy for all development types as opposed to the targets being split between two policies (CC2 for non-residential and H5 for residential). This would allow for greater clarity in policy wording and application.</p> <p>The proposed policy states that all non-residential development proposals must achieve energy efficiency targets for space heating, total heating demand and to achieve on site net zero by the provision of on site renewable energy for the residual energy demand. Currently the wording is broad and therefore could be interpreted to include change of use and extensions as well as new non-residential development.</p> <p>For new non-residential development, the targets for space heating are comparable to those set out by the Low Energy Transformation Initiative (LETI) Climate Emergency Design Guide and the RIBA 2030 Climate Challenge for commercial offices and schools. The site average total demand is slightly more relaxed than the LETI requirements (as defined for Commercial Offices and Schools, Total Energy Consumption). The targets are considered in line with LETI best practice however LETI does not provide best practice targets for other use types such as retail and industrial, the University therefore supports the "exceptional basis clause" for cases where the targeted performance cannot be met for technical, viability or other policy reasons.</p> <p>To improve effectiveness, the University proposes two amendments. Firstly, that the proposed policy is explicit in stating that the requirements to achieve energy targets are applied to new buildings only. Secondly, that that the proposed policy is developed to include energy targets for different development types within the overall categorisation of new non-residential, due to the differing requirements for building typologies and users. For example, Leeds City Council Local Plan update (Regulation 19, October 2023) put forward targets by type (housing, commercial, leisure, industry, research facility). Alternatively, Central Lincolnshire provide guidance on how proposals will be considered in the context of different building uses and where a particular building type may not be able to achieve the stated targets. The proposed wording should be accompanied by the exceptional basis clauses, and clarification on offsetting as covered in the following section.</p> <p>The achievement of energy targets and net zero carbon through renewables for change of use and extensions is likely to be challenging to achieve and, in some cases, will not be</p>	<p>No change proposed. CC2 is intended to provide guidance for all development, whereas H5 provides additional guidance for housing.</p> <p>The policy is intended to apply to changes of use and new non-residential development. In cases where the criteria cannot be achieved, the highest possible standards will be sought.</p> <p>Noted. No change required.</p> <p>Noted, but no change proposed. The differing requirements for various building typologies and users will be considered on a case-by-case basis and it is not considered necessary to prescribe many different targets for so many different types of buildings as this could be overly prescriptive or change over time as technology improves.</p> <p>Change proposed as above.</p> <p>It is considered that that the offsetting mechanism for residual carbon emissions will be considered on a case-by-case basis. Because the cost of delivering renewable energy infrastructure fluctuates over time, it is not considered effective to dictate a static cost. The policy aims to ensure that applicants pursuing the exceptional basis clause will demonstrate the extent to which the requirements can be met and clearly illustrate that a financial contribution or</p>
--	---	---

		<p>practicable. For example, achievement of on-site renewable energy generation to balance demand may not be feasible or viable depending on the scope for reducing energy demand through fabric improvements combined with the availability of space for new renewable energy generation technology. It is not considered that the policy should apply fully to all change of use applications or proposed extensions.</p> <p>The potential energy offsetting mechanism proposed by RBC is different to a carbon offset scheme as it requires financial contribution for any operational energy demand which is expected to be met by the national grid, irrespective of associated carbon emissions. For example, the draft Warwick Net Zero Carbon DPD proposes a carbon offset price of £245 per tonne CO₂, where the price is linked to the annual Treasury Green Book BEIS projections. Allowance is made for the national grid decarbonisation trajectory, so that the amount of carbon to offset in year 30 will be significantly lower than year 1, reducing the total cost of the carbon offset payment. No such allowance is made within the draft policy text proposed by RBC. The University does not support this policy, and considers that financial contributions should be linked to residual carbon emissions, and not energy demand.</p> <p>The requirement for provision of a justification for demolition should be accompanied by guidelines to indicate what would constitute a satisfactory justification, including specifying a methodology for assessment, quantification and reporting to enable effective and consistent decision-making. The requirement that 95% of construction waste will be diverted from landfill is reasonable. It should be noted that construction waste is a specific waste type, as distinct from demolition and excavation waste types.</p> <p>The embodied carbon target for new build commercial floorspace (less than 800kgCO₂/sqm for schemes of 5000m² or more) is slightly more relaxed than LETI Climate Emergency Design Guide for office and retail buildings and is in line with planning precedent elsewhere, and therefore the University is supportive of this policy. It is best practice to specify a methodology, and the University welcomes the specification of the RICS Professional Standard Whole life carbon as the preferred methodology for the assessment of embodied carbon and whole lifecycle emissions.</p>	<p>off-site infrastructure is equivalent to any unmet energy requirements. An upper and lower limit for financial contributions has been specified to provide certainty within a particular range.</p> <p>Change proposed as above.</p> <p>No change proposed. Linking financial contributions to energy demand rather than emissions is now considered best practice due to the ease of calculation. This is the approach recommended by LETI and is the adopted policy position of many other Local Authorities.</p> <p>No change proposed. It is considered that this level of detailed guidance with regard to waste is not within the scope of the Local Plan. Nonetheless, this may be satisfied by the additional footnote proposed as a result of comments from Mapletree Investments as described above.</p> <p>Noted. No change required.</p>
Stantec on behalf of Aviva Life & Pensions UK Ltd	CC2	<p>Aviva does not support the revised wording to Policy CC2. The removal of the requirement for all non-residential developments to meet BREEAM standards and replacing it with a requirement to achieve 'net zero development' is not supported. This change will place significant additional burden on the viability of all development schemes (note: it does not just apply to major schemes) and have the consequence of stifling development. Further, the policy includes requirements to meet other unduly onerous requirements for renewable</p>	<p>No change proposed. This approach reflects the adopted policy position of many other Local Authorities, reflects industry best practice and is expected to have no detrimental effects on viability. In cases where viability is</p>

		<p>energy generation, heating demand, water usage, demolition waste, and embodied carbon, with further financial penalties if these standards cannot be met. The general approach and detailed wording of the policy is inconsistent with the governments stated aims and objectives and has not been appropriately justified. As a result, the policy as currently worded is not sound. It should revert to the previous wording of Policy CC2.</p> <p>As an aside, the policy is over two pages long, wordy and unwieldy, and contains definitions within it. It needs to be substantially redrafted and the supporting text needs to be redrafted accordingly.</p>	<p>affected, applicants can pursue the exceptional basis clause whereby the highest possible standards are required. The Council has a duty to plan for and mitigate the effects of climate change and the built environment is a key part of meeting Reading's Net Zero 2030 target.</p> <p>No change proposed. It is considered that until the Building Regulations are improved to the extent that they deliver homes that are zero carbon, planning policies must provide detailed guidance.</p>
Turley on behalf of CBRE Investment Management	CC2	<p>CBRE IM support the LPU objective to contribute to the UK's legally binding target of net zero carbon by 2050, and achieving net zero carbon Reading by 2030. However, it is considered the requirement to go above and beyond BREEAM (an accepted industry practice) requirements for developments to be unjustified and onerous in terms of viability of developments given no viability evidence has been provided through this consultation to establish how a blanket requirement of policy to above and beyond industry standards to be untested and unjustified.</p> <p>It is noted that Developers only have the ability to influence the regulated energy demand of buildings through design and specification of materials and systems, and renewable energy technologies. The unregulated energy consumption, (often referred to as 'plug in load') is ultimately the function of the end operator use of the building, which cannot be influenced by the developer and therefore the requirement on the developer to offset emissions from unregulated energy use is not appropriate.</p>	<p>No change proposed. It is considered that many developments in Reading can too easily achieve high BREEAM scores due to the fact that they are sited in highly-accessible urban areas. This approach reflects the adopted policy position of many other Local Authorities, reflects industry best practice and is expected to have no detrimental effects on viability. In cases where viability is affected, applicants can pursue the exceptional basis clause whereby the highest possible standards are required.</p> <p>No change proposed. Language is proposed to ensure that unregulated energy consumption is accounted for using "reasonable estimates."</p> <p>Unregulated emissions are significant and therefore, all efforts must be made to reduce such emissions from the earliest stages of development.</p>

Environment Agency	CC3	<p>The information about fluvial flood risk could be expanded upon when discussing adapting for climate change (CC3).</p> <p>The policy states that “all development shall incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change”. This is welcomed, however, there is no reference to the climate change allowances which should be used when assessing flood risk for new development. We acknowledge that these allowances, and the linked gov.uk page, are included as a footnote in policy EN18. However, it would help if the information was also included with regards to policy CC3.</p> <p>Paragraph 4.1.6 states that applicants should refer to the “Reading Climate Change Emergency Strategy”. We would also suggest that the SFRA (mentioned in 4.1.11) could be included as a relevant document for completeness, as this includes key information about climate change and resilience measures.</p> <p>In paragraph 4.1.10 there is reference to the 2007 and 2008 floods with a footnote to The Pitt Review in this section. For completeness, it would be of benefit to include other flood events that have affected Reading (2013/14, Jan 2024 etc) in this section, with reference to Section 19 reports where available.</p> <p>Within paragraph 4.1.12 the sentence “Ultimately, raising the height of flooring above the predicted flood levels is a better alternative” is somewhat true, but to be clear this is not at the expense of reducing floodplain storage by raising ground levels. We would ask you to consider rewording “predicted flood levels” to “design flood level” or similar to be consistent with the wording of the SFRA.</p>	<p>No change proposed. It is unclear what additional benefit this would provide as it is sufficiently covered within EN18.</p> <p>No change proposed. It is unclear what additional benefit this would provide as it is sufficiently covered within EN18.</p> <p>Change proposed to refer to additional flooding events and relevant reports.</p> <p>Change proposed to refer to “design flood level.”</p>
Friends of the Earth	CC3	<p>Some form of air conditioning or forced cooling may well be necessary or desirable to maintain comfort in future summers in many buildings. Even if not fitted initially retro-fit should be designed in and allowance made in calculations of future summer electricity demand.</p> <p>Multi-stage heat-exchanger implementation with air handling in/out-take (MVHR) should be encouraged to mitigate heating/cooling requirements for fresh-air intake.</p> <p>Since harsher storms are expected to become much more frequent within the design life for any new building then suitable tolerance to higher category storms should be considered with a minimum category 2 hurricane tolerance suggested and category 3 hurricane tolerance to be strongly considered.</p> <p>As well as improving design of the drainage system we would like to see a policy to reduce hard standing - both by design in new developments and by people paving over gardens for car parking – which prevents rainfall being absorbed into the soil. This should reduce the flow into drains.</p>	<p>No change proposed. Forced cooling and future electricity demand is not within the scope of this policy.</p> <p>No change proposed. This is within the scope of the Building Regulations.</p> <p>Noted. Requirements to reduce hardstanding are within EN18 and EN19.</p>

Historic England	CC3	Note there is a typo: “colling”	Change proposed.
John Sharpe	CC3	It would be useful to explicitly restrict the conversion of gardens to car parking, without adequate provision for on site drainage. In established areas such as East Reading increase runoff is due largely to gardens being paved over for car parking not new development.	Noted. Requirements to reduce hardstanding are within EN18 and EN19. Although, in some cases, householders are permitted under national Permitted Development Rights to lay hard surfacing incidental to residential use and therefore, this is out of the control of the Council.
Lichfields on behalf of Mapletree Investments Pte Limited	CC3	<p>They therefore support the flexibility within the policy stating allowing divergence from the policy where “it can be demonstrated that requirements are not suitable, feasible or viable.”</p> <p>Mapletree are also concerned that, in assessing detailed proposals, the provisions of Policy CC3 may on occasion be internally inconsistent or conflict with emerging Policy CC2. One example is where the requirements of draft Policy CC3 to prioritise sustainable design measures (including green and brown roofs) could compromise the requirements of draft Policy CC2 to “meet remaining residual energy demands by producing, storing and using renewable energy on-site.” Effectively both these elements may be competing for finite roof space. They consider that in these circumstances on site energy generation should be prioritised given wider sustainability objectives.</p> <p>Whilst there is some recognition that these requirements may not always be “suitable, feasible or viable” Mapletree consider some acknowledgement of the limitations arising from site characteristics and development types is inserted into draft Policy CC3. This would increase the flexibility in how the policy is applied by the Council to allow scope to address such contradictions through at the planning application stage through development management processes</p>	<p>Noted.</p> <p>Noted. No change required. It is considered that each application will be considered on as site-by-site basis. In many cases, green or brown roofs can be established in tandem with rooftop PV.</p> <p>No change proposed. It is considered that “unless suitable, feasible or viable” sufficiently acknowledges limitations that may arise.</p>
Lichfields on behalf of USS Investment Management Limited	CC3	Our client concurs with the aspiration of Policy CC3 which seeks adaption to climate change. However, our client considers that it is important to ensure that any requirements set out in Policy CC3 do not render delivery of developments impracticable, unfeasible or unviable as this could impede the delivery of development to meet the borough’s development needs.	Noted. No change required. The policy clearly states “unless it can be demonstrated that requirements are not suitable, feasible or viable.”

		<p>RBC commissioned a Local Plan Viability Testing Report (dated 4th December 2024) in relation to the LPPU19 and this was only made publicly available on RBC's LPPU19 consultation website less than a week prior to the conclusion of the consultation period. Whilst this timing has allowed insufficient time for it to be reviewed and responded to in detail at the Regulation 19 stage it does not appear to assess the implications of draft Policy CC3.</p> <p>Our clients support the important caveat that the measures sought should be provided “unless it can be demonstrated that requirements are not suitable, feasible or viable”.</p>	<p>The Viability Testing Report does consider the financial impacts of the sustainability requirements of policies within the Partial Update. Nonetheless, where viability would be affected, the clause above would help to enable development.</p> <p>Noted.</p>
Stantec on behalf of SEGRO plc	CC3	<p>SEGRO consider that the first bullet point in Policy CC3 is too prescriptive in its requirements and does not allow for individual development sites to be considered on a site-by-site basis.</p> <p>Firstly, the text ‘wherever possible’ in regard to new buildings being orientated to maximise opportunities for both natural heating and ventilation and reducing exposure to wind and other elements, should be reinstated as worded in the adopted Reading Local Plan. This is because as currently drafted in the Pre-Submission Draft, the policy puts maximising opportunities for natural heating and ventilation and reducing exposure to wind and other elements at the highest priority when determining the orientation of a new building. When deciding on the orientation of a new building there are a range of factors to consider and such a prescriptive policy requirement when designing a scheme will ultimately lead to bad design. The policy does not allow for site specific circumstances to be taken into consideration and other design considerations are automatically pushed lower down the order of priorities when determining the orientation of a new building.</p> <p>Secondly, the measures required for new buildings are not feasible for the erection of all new buildings and places too heavy a burden on the operational requirements of that building. In many cases it would not be possible for a new building to deliver all of the measures prescribed in the policy, for example, not all buildings would be able to sustain a green or brown roof. Consequently, SEGRO request that the wording of Policy CC3 and the proposed strategies include sufficient flexibility to allow targets and requirements to be negotiated on a site-by-site basis. This would ensure that consideration towards the feasibility and viability of proposed climate change mitigation measures would have regard to a site's context. SEGRO consider that it is beyond the scope of planning policies to prescribe a single specific measure to address the risks of overheating that development must comply with. There are many ways for a non-residential building to be designed to address the risks of overheating beyond just the passive cooling measure. This specific</p>	<p>Do not agree. Individual developments proposals should include these elements “unless it can be demonstrated that requirements are not suitable, feasible or viable.”</p> <p>No change proposed. “Wherever possible” is effectively replaced by the clause stated above. The list of requirements is not intended to be read as an order of priority.</p> <p>Noted. This is addressed by “unless it can be demonstrated that requirements are not suitable, feasible or viable.” The fourth bullet clearly states “passive cooling AND energy efficiency measures.”</p>

		measure will not be the most effective measure for all developments and thus the policy should be amended to reflect that other measures may be more effective. SEGRO do not support the proposed amendment to the fourth bullet point of the policy and suggest the Council revert to the previous wording of this bullet point from the adopted Reading Local Plan.	
University of Reading	CC3	The University supports the amendment of policy CC3 to provide greater alignment with other existing and relevant documentation. RBC recognise the greater emphasis placed on the need for new developments to adapt to the effects of climate change by the NPPF is also reflected RBC guidance including the Reading Climate Emergency Strategy (2020) and in current and forthcoming Supplementary Planning Documents (SPDs). The changes proposed to this policy through the LPPU Pre-Submission Draft document are primarily to incorporate references to relevant documents, including the RBC Sustainable Design and Construction SPD (2019), the Reading Climate Change Adaptation Plan and to amend language to give greater weight to climate change mitigation. The proposed amendments to policy CC3 are supported and the policy is considered to be sound.	Noted. No change required.
Woodland Trust	CC3	We support this policy, in particular the wording encouraging use of trees to cool the urban environment and help connect habitat. This is in line with para 136 of the NPPF (December 2024): trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.	Noted. No change required.
Stantec on behalf of Aviva Life & Pensions UK Ltd	CC3	As per our comments in relation to Policy CC2 above, the suggested amended wording of Policy CC3 is not supported. Its requirements place significant additional burden on the viability off all development schemes (note: it does not just apply to major schemes) and will have the consequence of stifling development. The general approach and detailed wording of the policy is inconsistent with the governments stated aims and objectives and has not been appropriately justified. As a result, the policy as currently worded is not sound. It should revert to the previous wording of Policy CC3.	Do not agree. Individual developments proposals should include these elements “unless it can be demonstrated that requirements are not suitable, feasible or viable.”
Historic England	CC3	Para 4.1.7 Climate change also effects the historic environment. We suggest this is acknowledged in this paragraph.	No change proposed. The built environment includes the historic environment and it is unclear what additional benefit this proposed change would bring.
Historic England	CC4	Para 4.1.20 While we welcome this paragraph on archaeological remains, might it be expanded also to refer to the need to consider potential impacts on the setting of heritage assets? We suggest possible wording for consideration.	No change proposed. This is best addressed by EN2 and other heritage policies.

Friends of the Earth	CC4	We support decentralised energy if it can be shown to be compatible with ‘zero-carbon’ aims – so not making unmitigated use of fossil fuels or bioenergy. We have concerns about proposed use of CHP – assuming it involves burning some hydrocarbon (not necessarily ‘fossil’) fuel – on grounds of CO2 emissions and air quality. If hydrogen is proposed as a fuel we are concerned about the economics and environmental implications of ‘green hydrogen’ supply for this purpose. Also the likelihood that unmitigated natural gas backup may be proposed in case of problems with the primary energy source. The chances of effective carbon capture and storage in Reading are remote.	Change proposed to remove all reference to CHP and to emphasise the use of non-fossil fuel sources.
Stantec on behalf of SEGRO plc	CC4	Policy CC4 requires non-residential development of over 1,000 sqm to include decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable. SEGRO support the flexibility within the policy. This will ensure that the feasibility and viability of including decentralised energy can be considered on a site-by-site basis, subject to the necessary testing and evidence.	Noted. No change required.
University of Reading	CC4	<p>The proposed amendments to Policy CC4 are supported and the policy is considered to be sound, however amendments are required to the supporting text. The inclusion of references to CHP is inconsistent, and does not align with the policy sentence on schemes being renewable based. A paragraph (4.1.15) on CHP has been deleted. We assume that this is because CHP is no longer considered to be a suitable technology in the net zero transition, given the local impacts of on site fossil-fuel combustion. Therefore, we propose that all references to CHP are removed from the policy context to provide clarity and support the policy intent of CC4. Specifically, references to CHP should be removed from draft paragraphs 4.1.13 and 4.1.14.</p> <p>With regards to the heat networks aspect specifically, previous comments still stand regarding identification of new heat networks. It is recognised that work is ongoing to explore suitable locations for heat networks in the District, including through new Government requirements for heat network zoning. The University notes that work is ongoing to designate areas for new heat networks and develop local authority mechanisms to enforce requirements. The University would welcome the opportunity to contribute to the shaping of requirements in terms of location and performance as members of the Reading Climate Action Partnership.</p>	<p>Change proposed to remove all reference to CHP and to emphasise the use of non-fossil fuel sources.</p> <p>Noted. No change required.</p>
Stantec on behalf of Aviva Life & Pensions UK Ltd	CC4	As per our comments in relation to Policy CC2 and CC3 above, the suggested amended wording of Policy CC4 is not supported. Its requirements place significant additional burden on the viability of all development schemes (note: it does not just apply to major schemes) and will have the consequence of stifling development. The general approach and detailed wording of the policy is inconsistent with the governments stated aims and objectives and has not been appropriately justified. As a result, the policy as currently	Do not agree. Individual developments proposals should include these elements “unless it can be demonstrated that requirements are not suitable, feasible or viable.” This

		worded is not sound. It should revert to the previous wording of Policy CC4 insofar as the requirements 'shall consider' their inclusion.	will ensure that development is not prevented from coming forward.
Friends of the Earth	CC5	<p>Maceration: Where relevant for wastewater transport from sites, developments without onsite composting capability should be encouraged to utilise macerators implemented with suitable building wastewater system design.</p> <p>PFAS: Use and waste of perfluorinated alkyl substances (PFAS) should be prohibited with zero tolerance since alternatives are available and can be required in all refurbishments and new builds. This will be essential to avoid significant further environmental contamination of local waterways. PFAS are often used in surface sealers, paint, adhesives, tile, grout, concrete, carpets, textiles, and within refrigerants as well as various types of insulation however alternatives to all of these exist. Rather than requiring Health Impact Assessments (HIA) for any permitted use the complete ban of PFAS is recommended which is much more feasible to implement than defining a new means to consider PFAS within HIA. Perhaps the local plan needs to identify the need for storage or processing areas/ recovery and recycling areas to deal with the flow of new materials needed within these new systems. This would include biofuels but also reprocessing of batteries and solar panels etc. to recover valuable materials.</p> <p>Waste from Sustainable Technologies: Over time there is going to be a significant increase in waste solar panels, batteries, heat exchangers etc., all of which will contain rare (and valuable) metals and be of different generations so require skill to identify and disassemble. The present facility at Smallmead (re3) is unlikely to be suitable as it stands. The current re3 contract should be reviewed in view of future needs and new facilities should be provided to support moves to a sustainable 'circular economy'.</p>	<p>No change proposed. It is considered that prescribing specific technologies limits flexibility in how the policy aims can be achieved.</p> <p>No change proposed. It is considered that prohibiting the use of certain substances is not within the scope of the Local Plan. Nonetheless, policy EN18 aims to ensure that pollution or contamination and associated risks to human health are avoided.</p> <p>No change proposed. This is not within the scope of the Local Plan.</p>
Sport England	CC7	<p>4.1.32 We are disappointed that the reference to Active Design has been struck out. There are other local plans where Active Design is referenced. We would be grateful if it could be explained why it has been removed.</p>	Noted. No change proposed. This specific sentence on Active Design was struck out because it referred to an out-of-date URL. The policy has been significantly expanded to include the elements of Active Design.

DP9 Ltd on behalf of SH Reading Master LLP	CC7	We strongly support Policy CC7 and its emphasis on achieving high-quality design, enhancing physical character, fostering a sense of community, and addressing environmental issues such as climate change. The comprehensive framework outlined—covering context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan—is fundamental to delivering developments that sustainable. Station Hill Reading exemplifies these principles embedded within Policy CC7, as demonstrated through its phased development approach. We welcome the continued emphasis on high-quality design and public realm improvements through this policy and look forward to ensuring Station Hill remains a benchmark for urban regeneration in Reading.	Noted.
Friends of the Earth	CC7	'Built Form': should include reference to accessibility by bicycles including bicycles with trailers to transport children or goods. 'Nature': should include a requirement that new plantings and/or new natural features are actively managed – by developer or new owners/tenants and checked after perhaps 5 years and replaced if necessary. Many planted trees seem not to survive.	Noted. No change required. These elements are best addressed through policies TR4 and EN12/EN14 respectively.
John Sharpe	CC7	Built form - To be sound this paragraph should also include cycling explicitly. Nature - To be realistic plans should include a specific requirement for post development i.e. define how many trees are surviving in good condition after 5 years not just how many are planted as many are poorly planted, not watered and die in early years as a result.	Noted. No change required. These elements are best addressed through policies TR4 and EN12/EN14 respectively.
Stantec on behalf of SEGRO plc	CC7	SEGRO support good design and public realm improvements onsite for major development proposals. However, SEGRO considers that the policy which suggests developers improve and maintain the public realm of the surrounding area is an inappropriate planning policy. Requiring applicants for major developments to improve and maintain the public realm of the surrounding area to the application site is a particularly onerous and impractical policy requirement given the likelihood of relying on third-party land to deliver improvements and maintenance to the public realm of the offsite surrounding area to a site development proposal. This also raises further concerns in respect of site deliverability. For the policy to be considered to be 'justified' in accordance with NPPF paragraph 35(b) the Policy should remove the onerous requirements for applications to deliver off-site public realm improvements and maintenance and should be worded so that off-site public realm improvements are delivered where feasible, necessary and practical. SEGRO do not object to the principle of financial contributions towards offsite public realm	Do not agree. The policy does not require off-site delivery of public realm improvements. It focusses on on-site provision and where there is not sought, applicants may be required to make a financial contribution. The elements of the policy are clearly aligned with the National Model Design Code referred to in the NPPF itself. Noted.

		improvements but only where it is feasible, necessary and practical to do so.	
Thames Valley Police Designing Out Crime	CC7	<p>The previous wording of Policy CC7 provided reference to the wording within the NPPF, requiring developments to ensure that they: <i>Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion</i>. This wording has now been removed from the redrafted policy CC7. It is noted that there is inclusion of the word “safe” under some of the proposed subheadings within the policy. However, to be consistent with national policy and to be effective, it is considered that the creation of safe and secure environments should be an overarching theme of policy CC7 and should be referred to in the first paragraph.</p> <p>Policy CC7 is a strategic design policy within the Local Plan and should include clear and direct reference to the NPPF, and reference the role of design in both reducing crime, and reducing the fear of crime.</p> <p>In any case, where the wording “safe” has been used within the policy, it is considered that for clarity it would be more appropriate to include the words “safe and secure”.</p>	<p>Change proposed.</p> <p>No change proposed. It is unclear what additional benefit specific reference to the NPPF within the policy would bring.</p> <p>Change proposed.</p>
University of Reading	CC7	<p>The University supports the principle of good design to comply with the requirements of chapter 12 of the NPPF. It supports updating policy CC7 to reflect the principles set out in the National Design Guide and National Model Design Code. This will ensure consistency with national policy and provide clarity on the design standards for proposed development. Bullet point 1 (context) of the policy advises that the development will need to ensure that it makes a contribution towards enhancing its surroundings. The policy is not effective and is unrealistic, requiring proposals to enhance its surroundings. While development should seek to avoid any detrimental impact on its surrounding, it may not be practicable or possible for all proposed development to enhance the surrounding of a site whilst meeting the needs of development. The wording of the policy should be amended as follows to make it effective and consistent with national policy:</p> <p>“Context – enhances the surroundings where possible based on a sound understanding of the features of the site and its surroundings and is responsive to local history, culture and heritage.”</p> <p>Bullet point 5 (nature) of the policy advises that the development will need to ensure that it makes a contribution towards and enhancing and optimising nature. The policy is not effective and is unrealistic, requiring proposals to enhance and optimise ‘nature’. While development should seek to avoid any detrimental impact on such considerations, it may not be practicable or possible for all proposed development to enhance or optimise ‘nature’ whilst meeting the needs of development. The term ‘nature’ is ambiguous and should be replaced with a more appropriate term.</p>	<p>Do not agree. No change proposed. The language is clearly aligned with the National Model Design Code and the NPPF. Each case will be considered on a site-by-site basis and the policy clearly states “where on-site provision is not sought, applicants may be required to make a financial contribution.” This will provide sufficient flexibility.</p> <p>Do not agree. No change proposed. The language is clearly aligned with the National Model Design Code and the NPPF. Moreover, under Biodiversity Net Gain requirements, applicants will be required to enhance nature. The use of the word “nature” is employed in an effort to align the Local Plan with the language used in national guidance.</p>

		<p>Bullet point 5 (nature) further states that schemes should 'retain existing trees and aim to establish new trees'. This part of the policy is too onerous, is unrealistic and therefore not effective as no distinction has been made regarding the value of existing trees. It indicates all trees have to be retained and protected. The policy would be effective and consistent with national policy if it seeks to retain trees that make positive contribution to visual or residential amenity, heritage or nature conservation value. This part of the policy is in conflict with the policy wording set out in Policy EN14 'Trees, Hedges and Woodlands' which states that 'Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance' (our emphasis).</p> <p>The wording of the policy should be amended as follows to make it effective and consistent with national policy: "Nature – enhances and optimises nature the natural environment where possible by integrating existing and new natural features into a multifunctional network to support quality of place, biodiversity, water management and climate change mitigation. Schemes should retain existing trees where they are of importance by virtue of their contribution to visual or residential amenity, heritage or nature conservation value and aim to establish new trees."</p>	Do not agree. "Should" retain existing trees is not as onerous as "must" and each case will be considered on a site-by-site basis under EN14.
Woodland Trust	CC7	We support this policy, particularly the wording encouraging a positive contribution to nature, retaining existing trees and aiming to establish new trees. This is in line with para 136 of the NPPF (December 2024): trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.	Noted. No change required.
Stantec on behalf of Aviva Life & Pensions UK Ltd	CC7	As per our comments in relation to the earlier CC policies, the suggested amended wording of Policy CC7 is not supported. Its requirements will place significant additional burden on the viability of all development schemes (note: it does not just apply to major schemes) and have the consequence of stifling development. Indeed, the requirement for major proposals to 'improve and maintain the public realm of the surrounding area' or 'make financial contributions towards public realm improvements' presumably beyond the application site is unlikely to be in the applicant's control and in many cases will not be justified. The general approach and detailed wording of the policy is inconsistent with the governments stated aims and objectives and has not been appropriately justified. As a result, the policy as currently worded is not sound. It should revert to the previous wording of Policy CC7.	Do not agree. No change proposed. The language is clearly aligned with the National Model Design Code and the NPPF. Each case will be considered on a site-by-site basis and the policy clearly states "where on-site provision is not sought, applicants <i>may</i> be required to make a financial contribution." This will provide sufficient flexibility.

Friends of the Earth	CC8	New developments must not result in increased air pollution beyond current WHO thresholds. This should be added to the list – many pollutants cannot be smelled and are not in the form of visible dust and fumes. Developers should address expected performance against specific sections of this policy in the planning application. See also EN15.	No change proposed. Amendments to Policy EN8 are not within the scope of the Local Plan Partial Update.
Environment Agency	CC9	The information about fluvial flood risk could be expanded upon when discussing adapting for infrastructure (CC9). The only reference to flood risk in this section is in the summary, which lists “flood mitigation and prevention measures” as a low priority (i.e., “where a specific need is identified and justified”) when considering provisions or financial contributions to secure infrastructure for new development. We are not aware of any currently planned flood alleviation schemes or flood defences in this area.	Do not agree. It is considered that information about fluvial flood risk is best addressed by policy EN18.
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	CC9	The ICB welcomes and supports the proposed changes to Policy CC9, which healthcare provision is now under the highest priority list when securing infrastructure.	Noted. No change required.
Mr Tom Clarke MRTPI, Theatres Trust	CC9	We support this policy as it better articulates that funding will be sought for theatres within cultural infrastructure, and that cultural infrastructure is rightly considered as important in contributing to sustainable development.	Noted. No change required.
University of Reading	CC9	The University supports the principle of development funded infrastructure where infrastructure is required in order to make a development acceptable. The University welcomes the recognition within the policy that infrastructure, services, resources, amenities or other assets will be provided either through direct provision or financial contributions. This policy is considered to be sound and no amendments are required.	Noted. No change required.
University of Reading	CC10	The first sentence of the policy states that ‘Development that would detrimentally affect health will not be permitted unless it can be demonstrated that negative effects are mitigated’. While the University agrees that development should seek to promote healthy places and reduce the impacts of development on health wherever possible, it is considered that this part of the policy wording as drafted is too broad, and overly restrictive. It is therefore not considered that the policy as drafted is effective, and will	Do not agree. It is considered that due to the significant strain the NHS and GP surgeries are experiencing, addressing the need for health

		<p>constrain development. Chapter 8 of the NPPF seeks to achieve healthy, inclusive and safe places. However, it does not address the direct impacts of development on health. To make the policy sound, it is considered this part of the policy should be amended to read:</p> <p>“Development must consider impacts on the health of existing and future residents that would detrimentally affect health will not be permitted unless it can be and where applicable, demonstrated that negative effects are mitigated”</p> <p>It also requires that proposals for ‘major development or for proposals for accommodation for vulnerable people must be accompanied by an HIA’ which includes certain elements. This part of the proposed policy is supported.</p> <p>It is considered that the amendments above are required to ensure that policy CC10 effective and in accordance with national policy and therefore is sound.</p>	infrastructure from a very early stage is of paramount importance.
DP9 Ltd on behalf of SH Reading Master LLP	CC10	<p>We acknowledge the importance of ensuring developments contribute positively to health and wellbeing, and we support the principle of Policy CC10. Station Hill was subject to an outline planning consent where health-related impacts were considered as part of the Environmental Statement (ES) and supporting documents approved with the application. This assessment provided a robust review of potential health-related impacts and their mitigation, proportionate to the scale and nature of the development. Requiring a separate Health Impact Assessment (HIA) for Reserved Matters Applications would therefore be unnecessary and result in duplication of work. It is therefore requested that this new policy includes supplementary text that highlights the requirement is needed for new full detailed planning applications only. To ensure clarity and consistency, we request that Policy CC10 explicitly states that its requirements will not apply to Reserved Matters Applications proceeding under an existing outline consent where health considerations have already been assessed and agreed.</p>	No change required. It is already the case that applications already approved would not be retroactively subject to the requirements of a new policy.
John Wilkins	CC10	<p>The plan identifies three areas of Reading where high rise buildings are being encouraged. Why? This style of building is out of kilter with much of Reading. I gather that there would be no need for car parking spaces in such buildings and it is not clear to me that any amenity space will be provided. This seems to be the sort of development which used to be found in Eastern Europe and some UK cities where such blocks now seem to be being demolished as unsuitable. Is this part of the plan encouraging the slums of the future? Do many people really want this type of development? Is it really just the developers which want such developments as a way of making more profit?</p>	No change proposed.
Royal Borough of Windsor and Maidenhead	CC10	<p>The Royal Borough is also supportive of Reading Borough Council's intentions in regard to requiring Health Impact Assessments.</p>	Noted. No change required.

AWE plc and AWE plc on behalf of the Ministry of Defence (MOD)	CC10	<p>AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield. AWE and MOD are concerned that the importance of policy OU2 and its application to ALL policies and proposed development within the DEPZ should be restated wherever directly relevant to policies included in the update. Given one of the key objectives of OU2 is to protect public safety, the effectiveness of OU2 could be undermined if not considered within any HIA. This raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by including the following text within policy CC10: <i>“Any development proposals within the Detailed Emergency Planning Zone for AWE Burghfield</i></p> <p><i>and AWE Aldermaston with the potential to increase the population within the DEPZ must be accompanied by an HIA which complies fully with policy OU2”.</i></p>	No change proposed. The plan seeks to avoid repetition and unnecessary cross-references wherever possible. Policy OU2 applies to all development, and repeating elements of it in other policies is not necessary.
Churchill Living	CC10	<p>For the future plan to be in line with national policy and effective, the following wording should be included to Policy CC10 to recognise the health benefits of older persons housing: <i>“Proposals for major development or for proposals for accommodation for vulnerable people (excluding older persons housing) must be accompanied by an HIA which includes (but is not limited to)”</i></p>	Do not agree. No change proposed. The HIA would capture any consideration of said benefits. Due to the particular needs of older residents and possible vulnerabilities, a full picture of health impacts is deemed necessary.
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	CC10	The ICB welcomes and supports this new Policy CC10 related to the requirement of a Health Impact Assessment (HIA).	Noted. No change required.
Historic England	EN1	We are approaching reference to historic parks and gardens in this policy as applying to RPGs and other historic parks and gardens of local or regional interest. If the policy is intended to focus only on those parks and gardens on the register maintained by Historic England, these two references in the policy should be changed to Registered Parks and Gardens.	No change proposed. EN1 is not within the scope of the Local Plan Partial Update.

Berkshire Gardens Trust	EN1	We are pleased with the inclusion and wording of EN1: Protection and Enhancement of the Historic Environment and its inclusion as a Strategic policy. We assume that this policy refers to Registered Parks and gardens and that locally important parks and gardens would be covered in the later EN4: Locally Important Heritage Assets.	Noted. No change proposed. These policies are not within the scope of the Local Plan Partial Update.
Woodland Trust	EN3	We support this policy, in particular the wording encouraging protecting and encouraging the maintenance of green spaces and important trees, particularly where they are intrinsic to the history and character of the area. This is in line with para 136 of the NPPF (December 2024): trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change	Noted, although these policies are not within the scope of the Local Plan Partial Update.
Berkshire Gardens Trust	EN4	<p>EN4 is heavily biased towards the built environment so that a wide range of locally important historic parks and gardens within the Borough which are not being recognised. We raised this point in January and are very disappointed to see no action has been taken within the latest update. We therefore refer you to NPPF 195: <i>Heritage assets range from sites and buildings of local historic value</i>; 196: <i>Plans should set out a positive strategy for the conservation and enjoyment of the historic environment</i> [ie including local assets]; and 209: <i>The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset</i>. This gives weight to the need to conserve and enhance all local non-designated assets which includes historic parks and gardens. EN4 is not therefore sound and needs redrafting to cover local non-designated parks and gardens, in accordance with national policy.</p> <p>We understand that a list of locally important buildings and elements such as statues is ongoing but there is no evidence of recording or assessing the historic value of open spaces throughout the Borough. By way of example in the Reading Historic Area Assessment: the historic value of the open setting of St Mary's Church is ignored, with only the trees and open space deemed to be of value. Whereas this is an important historic space in its own right as well as the setting of a Grade I listed building and an important positive contributor. Similarly the historic value for graveyard to the rear of the town hall receives no mention at all and is not identified as a positive contributor. In Figure 46 even the Registered Park and Garden at Forbury is not recognised as an important positive contributor. This needs urgently addressing as the Plan provides no substantive protection for the several historic non-designated parks and gardens across the Borough which are small jewels and make a significant contribution to the quality and character of the town. We see that some local historic non-designated parks and gardens</p>	<p>No change proposed. The language in EN4 is intended to sufficiently cover all assets, not simply buildings or elements of the built environment. There is already one garden (Kings Road Garden) on the local list.</p> <p>Noted. It is not considered that assessing locally important buildings or elements is relevant to the changes being made under the Local Plan Partial Update. These spaces are afforded protection under EN4 whether or not they are listed specifically. Current resources constraints have limited the ability of the Council to dedicate officer time to this specific area, but the policy aims to protect these sites nonetheless. Moreover, sites included under policy EN7, are afforded additional consideration by virtue of being either Public Open Space or Local Green Space.</p>

		<p>are mentioned in the Historic Environment Background Paper 2018: <i>number of local parks and gardens have also been identified as containing historic interest, including Whiteknights (University of Reading), St Mary's and St Laurence's Churchyards and the Abbey Ruins/Chestnut Walk</i>. However, there is no further analysis of these or other parks in the Borough. We urge the Council to embark on creating a database of historic non-designated parks and gardens. A good starting point is the list of open spaces under Policy EN7. Through our own research we have to date identified the following publicly accessible parks as another starting point (but this omits graveyards which are to be reviewed under a separate BGT project):</p> <ul style="list-style-type: none"> • Cintra Park • King George V Gardens • Kings Road Garden • Palmer Park • Chestnut Walk • Maiden Erlegh Nature Reserve • Possibly Coley Park <p>To which might be added privately owned gardens such as:</p> <ul style="list-style-type: none"> • Whiteknights • Acacias • MERL • Foxhill House • Highdown School 	
University of Reading	EN4	<p>The University agrees that the wording of this policy should be updated as proposed to be consistent with national policy regarding non-designated heritage assets to ensure that it is clear and robust.</p> <p>However, it is considered that the proposed wording is inconsistent with paragraph 209 of the NPPF. The proposed policy wording, which refers to substantial harm and substantial public benefits, elevates the test for non-designated heritage assets to that applied to heritage assets. This is not consistent with the wording in paragraph 209 of the NPPF.</p>	Noted. It is not agreed that the approach conflicts with paragraph 209 which requires a balanced judgement. It is considered that requiring substantial public benefits that outweigh the harm or loss provides this balance.
Historic England	EN4	<p>Para 4.2.21</p> <p>While we are comfortable with policy EN4, we are not entirely clear about paragraph 4.2.21, relating to the scope of policy EN4. We had interpreted policy EN4 as having a relatively wide scope. Regrettably, we are unclear about its scope in light of paragraph 4.2.21. Surely when identifying buildings of townscape merit, the expectation is that they are locally important?</p>	No change proposed. Buildings of townscape merit are a key part of the character of a conservation area, recognised as such in the relevant conservation area appraisal, and are therefore part of a designated heritage

		We believe that either the text of paragraph 4.2.21 or the title of policy EN4 needs to change, perhaps both.	asset, and best protected through other policies in the plan such as EN1 and EN3.
Adrian Lawson	EN7	I would like to suggest that the Local plan makes reference to the opportunities provided by the Kennet meadows shown in the attached map. Specifically their potential for recreation, access to open space, floodwater storage and biodiversity enhancement.	Noted. No change proposed as this is best covered by SR5: Kennet Meadows.
Friends of the Earth	EN7	<p><u>Fobney Meadow / Fobney Marsh</u> We support calls for the Fobney Meadow / Fobney Marsh area to be designated as a Local Green Space. This area is often flooded and as a result becomes a hot spot within Berkshire for bird life especially during the autumn and winter months. It is a green lung with proximity to other wildlife habitats including Fobney Island Nature Reserve EN7Sb (to the south) which it complements.</p> <p>Because it floods and is a useful holding area for flood water it is not suitable for development but LGS status would give it enhanced status. Ideally it should be adopted by the Council and a management plan put in place.</p> <p><u>Reading Old Cemetery</u> We support calls for Reading Old Cemetery to be designated as a Public Open Space. The land lies adjacent to one of the most densely populated areas of Reading, Newtown, and between two roads that are designated as part of an Air Quality Management Action area. It offers a welcome respite to the urban environment and is supported by friends of Reading Old Cemetery who manage part of it as chalk grassland habitat.</p>	<p>No change proposed. It is unclear why additional protection for an area that is frequently flooded is necessary or in need of enhanced status. It is not within the scope of the Local Plan Partial Update to adopt the space or prescribe a management plan.</p> <p>No change proposed. Reading Old Cemetery is a Registered Park and Garden and is sufficiently protected by its listed status. It is unclear what additional benefit would be provided by its designation as Public Open Space.</p>
John Sharpe	EN7	<p>The plan is unsound because it fails to include the Fobney Meadow / Fobney Marsh area as a Local Green Space. This area is often flooded and as a result becomes a hot spot within Berkshire for bird life, especially during the autumn and winter months. The photograph below shows the list of birds recorded at this location during November 2024.</p> <p>The plan is unsound as it fails to offer the protection offered by policy EN7: LOCAL GREEN SPACE AND PUBLIC OPEN SPACE to Reading Old Cemetery as a Public Open Space. Other church yards in Reading such as St Giles and St Lawrence are included but it seems an omission that the Reading Old Cemetery is not included. The land lies adjacent to one of the most densely populated areas of Reading, Newtown and between two roads that are designated as part of an Air Quality Management Action area. It offers a welcome respite to the urban environment and is supported by friends of Reading Old Cemetery who manage part of it as chalk grassland habitat.</p>	<p>No change proposed. It is unclear why additional protection for an area that is frequently flooded is necessary or in need of enhanced status. It is not within the scope of the Local Plan Partial Update to adopt the space or prescribe a management plan.</p> <p>No change proposed. Reading Old Cemetery is a Registered Park and Garden and is sufficiently protected by its listed status. It is unclear what additional benefit would be provided by its designation as Public Open</p>

			Space. Other churchyards are included because they are not listed by Historic England.
Savills on behalf of British Oxygen Company	EN7	<p>Policy EN7 is a strategic policy that protects Local Green Space and Public Open Views from future development. BOC supports the principle of protecting open space for public enjoyment and the site is adjacent to one of these locations – EN7Si: Waterloo Meadows. However, part of the policy wording states that:</p> <p><i>...Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted. ...</i></p> <p>At the previous examination, the Policy was found to be sound. No proposed amendments are suggested for this Policy as part of this consultation. As such, BOC does not object to this policy however, it is curious whether any future development on an established Industrial site (such as BOC) would not fall in this category of 'insensitive' development. BOC would therefore like to highlight that this policy may impact or restrict future growth on their site due to noise implications (when assessed with draft policy EN17).</p>	It is not possible to comment on whether or not future development on the adjacent site would be considered 'insensitive' until such time as detailed proposals are put forward.
Susan Gray	EN7	<p>I would like to raise my concern that Fobney Marsh is not mentioned in the Local plan, this is an important area within Reading acting as a natural green space for the residents to walk and be within the natural environment. This is a uniquely open natural space (not a park or manicured area.) It provides clean air and a space away from the town.</p> <p>Fobney Marsh provides a flood control area and any development or drainage of this land would therefore cause issues in other areas. It frequently floods in Autumn and Winter, and with rainfall expected to rise in the future it is important to maintain these areas for flood protection. As part of Reading's response to the climate emergency and biodiversity crisis the land should also be treated as a carbon sink and unique nesting site for birds in the area</p> <p>This area provides the utmost importance to our town, Reading is densely populated and intensely urban and Fobney Marsh provides an accessible area for the residents who do not have private transportation.</p>	No change proposed. Although the Council notes the important role that Fobney Meadows play in terms of flood control and biodiversity, the NPPF is clear that Local Green Space should not be an extensive tract of land. Fobney Meadows is, by Reading standards, very extensive and in the Council's view it would not qualify as LGS. It is subject to a number of other designations around its biodiversity and landscape, as well as being mainly within the functional floodplain.
The Warren and District Residents Association (WADRA)	EN7	Mapledurham Playing Fields is listed as one of these LGS's and is referenced as EN7Nm on page 49 of the document and is shown on Plan A on page 3 of the draft. We welcome these inclusions in the plan and would expect Reading Borough Council to fully honour these commitments in perpetuity.	Noted. No change proposed. Based on our measurements, we have determined this figure to be accurate

		It is also noted at page 49, at 4.2.25 of the draft update, that the size of Mapledurham Playing Fields, has been reduced from 10.86 to 10.35 Hectares, however, we question the accuracy of this figure.	and we note that no alternative measurements have been provided.
Berkshire Gardens Trust	EN7 and EN8	The policies under EN7 and EN8 provide no protection to the historic value of open space.	Do not agree. Local Green Space status specifically recognises “historic significance” in many cases.
Environment Agency	EN11	<p>We are of the opinion that the wording of Policy EN11 could further be strengthened to ensure the water environment in Reading is protected and enhanced as required by NPPF paragraph 187. We therefore do not consider that the local plan is sound as it is not consistent with national policy. In our previous comments in response to the consultation at the Regulation 18 stage, we suggested some amendments to policy EN11 to ensure it achieves maximum protection and enhancement of the water environment in Reading.</p> <p>These amendments have not been made in relation to policy EN11. We reiterate our previous comments and in addition, we make the following additional comments.</p> <p>The local plan should include information (in paragraph 4.2.48) to ensure that buildings next to the river may need to be limited in height such that they do not cause over shading of the river, as this can be detrimental to any vegetation which is planted within the riparian zone or the river channel, banks, etc.</p> <p>Paragraph 4.2.51 should be strengthened to state that there must be a buffer zone provided, unless there is a valid reason not to provide one and they have shown robust evidence of this. It should also mention that buffer zone should be at least 10m wide and wider where possible. Bullet point 6 of policy EN11 should be changed to omit “wherever practicable and appropriate.”</p> <p>There should be a bullet point about BNG that should highlight that statutory biodiversity net gain metric with regard to the watercourse must be completed. It must also include literature to show how enhancement will be achieved and secured for 30 years. Whilst we appreciate that EN12 includes the BNG req., it is important for this to be emphasised as a requirement for water environment enhancement.</p>	<p>Do not agree. It is considered that EN11 when read in tandem with EN12 is consistent with national policy for the reasons given below. Changes to EN11 are not within the scope of the Local Plan Partial Update.</p> <p>Due to nature of urban densities, it is unlikely to be practical to ban buildings of height alongside watercourses within the town centre. Nonetheless, the effects of daylight and shading would be considered in terms of ecological impacts and biodiversity net gain on a case-by-case basis.</p> <p>Do not agree. Paragraph 4.2.51 and bullet point 5 already emphasises the importance for providing a buffer. It is impractical to specify a wider buffer where possible, but a wider buffer may be encouraged through an applicant's efforts to meet BNG requirements.</p> <p>Do not agree. No change proposed. This is sufficiently covered by EN12.</p>

DP9 Ltd on behalf of SH Reading Master LLP	EN12	<p>We acknowledge the importance of enhancing biodiversity and support measures that aim to achieve a 10% Biodiversity Net Gain (BNG) in line with the principles of sustainable development. However, the policy needs to be implemented in accordance with existing legislation and does not impose additional requirements. The Biodiversity Gain Requirements (Exemptions) Regulations 2024, as referenced in the draft policy, explicitly states that RMAs under an existing outline planning consent are exempt from the mandatory requirement to achieve a 10% BNG. This exemption reflects the legislative recognition that RMAs are bound by the parameters and conditions of their outline consent, which could not have anticipated the introduction of these new requirements. We therefore request that the policy text is revised to explicitly state that RMAs submitted pursuant to an outline consent granted before the mandatory BNG requirements came into effect are exempt. This will ensure consistency with the Biodiversity Gain Requirements (Exemptions) Regulations 2024 and avoid unnecessary challenges during the determination of RMAs.</p>	<p>Do not agree. No change proposed. It is not necessary to restate the exemption within local policy.</p>
Environment Agency	EN12	<p>We are of the opinion that the wording of Policy EN12 could further be strengthened to ensure the important wildlife habitats including woodlands, grasslands and wetlands in are protected and enhanced as required by NPPF paragraphs 192 to 195. Whilst we agree with the findings/conclusion of the Sustainability Appraisal and support the adoption of a revised policy (option EN12 (i)), we advise that the policy wording is strengthened further. We therefore do not consider that the local plan is sound as it is not consistent with national policy.</p> <p>Within bullet point b) of policy EN12 it should be set out that there needs to be 10% BNG in all sections of the metric and they cannot be used interchangeably. It should also be set out that if there is a small site which would otherwise be eligible for the small site metric, but it has a watercourse in or next to the red line boundary, it still has to use the statutory metric.</p> <p>Within bullet point c) of policy EN12 it should refer to providing new native tree planting. All references to wildlife friendly species should be changed to native as a priority rather than preferably native.</p> <p>It may be useful not to provide specific examples of ecological enhancements, as people may see these as the only options when there are many more possible, most of which are very site specific, so this could restrict the enhancements which are provided.</p> <p>Within bullet point d) of policy EN12, reference to buffer zones being all least 10m wide and left free from any development and formal landscaping, and be managed for the benefit of wildlife in the river and the riparian zone (an ecological buffer), should be made.</p>	<p>Do not agree. No changes proposed for the reasons stated below.</p> <p>Do not agree. No change proposed. It is not considered necessary to re-state detailed requirements of the statutory metric here.</p> <p>No change required. Bullet point c) refers explicitly to native planting. It is unclear that there would be any additional benefit with use of the work “priority” rather than “preferably.” CC3 and EN19 also emphasise the importance of native planting.</p> <p>Do not agree. No change proposed. The Local Plan aims to be concise and provide flexibility for applicants to deliver the stated requirements.</p> <p>Do not agree. No change proposed. This is sufficiently addressed by EN11.</p>

		<p>This should be another bullet point as it ensures the provision of native and wildlife friendly landscaping next to waterbodies.</p> <p>Within bullet point 3, relating to re-naturalising the banks of waterbodies, the emphasis should be that this is done over the use of a hard bank, and if a hard bank has collapsed, a softer and more ecologically friendly alternative should be looked at to replace the hard bank.</p> <p>Paragraph 4.2.66 should mention that there needs to be a net gain in Hedgerow and Watercourse Units, as well as Habitat Units, as they are separate.</p>	<p>Do not agree. No change proposed. The use of hard banks is effectively discouraged by EN11, EN12 and EN19.</p> <p>Do not agree. No change proposed.</p> <p>Change proposed.</p>
Friends of the Earth	EN12	<p>b) Biodiversity net Gain</p> <p>Biodiversity is threatened everywhere and we are concerned that cumulative effects of a number of developments may be underestimated.</p> <p>Biodiversity net gain and its measurement is a relatively new and uncertain area – ecosystems are very complicated -so we would like to see a target of 20% rather than 10% in the hope that it will be effective as a strategy to at least achieve some net gain.</p> <p>Off-site improvements to the 'Green Network' should be very useful.</p>	<p>Do not agree. No change proposed. This option was considered in detail and rejected for the reasons outlined in the Background Paper, namely that it was determined that 20% BNG would be very difficult to achieve on most sites. To ensure that all sites include a proportion of green cover, applicants will be expected to also comply with EN19.</p>
Home Builders Federation	EN12	<p>Clause b sets out the statutory requirement to deliver a 10% Biodiversity Net Gain and that this should be applied on the basis of the Biodiversity Hierarchy that is set out in PPG. HBF would therefore question whether the policy is necessary given that is simply reiterating the statutory requirement for BNG. If the policy is to be included, we would suggest the penultimate sentence should be deleted as it is not relevant to the decision maker where offsite provision is delivered. Paragraph 74-008 of PPG is clear that the biodiversity hierarchy includes enhancement of existing habitats on site, creation of new habitats on site, allocation of registered offsite gains and final purchase of credits. The proximity of gains to the site is not necessary for consideration of whether a development has implemented the hierarchy. As the council will be aware the spatial multiplier within the metric already imposes unit penalties the farther the purchased units are from the original development site. As such if development is already incentivised to deliver offsite BNG as close to the development as possible making this sentence an unnecessary additional step.</p>	<p>No change proposed. This part of the policy does significantly more than simply restating national legislation and guidance. The Council considers that it is of relevance to the decision maker where off-site provision is provided, despite this already being reflected in the multiplier, as otherwise this could lead to deterioration of Reading's environment with off-site improvements only secured a long way away.</p>
John Sharpe	EN12	<p>Biodiversity opportunity areas gone?</p>	<p>Biodiversity Opportunity Areas are referred to in the policy, but a Local Nature Recovery Strategy is in production that will provide more up-to-</p>

			date information for planning policy purposes,
Royal Borough of Windsor and Maidenhead	EN12	The Royal Borough of Windsor & Maidenhead supports the intentions of your ambitious Climate Change and biodiversity policies.	Noted. No change required.
Swifts Local Network: Swifts & Planning Group	EN12	<p>Strategic Policy EN12 Biodiversity (c) (Wildlife Friendly Design - page 58) is very welcome to implement NPPG 2019 Natural Environment paragraph 023 which specifically highlights the importance of "swift bricks", and NPPF December 2024 Paragraph 187 (d) (page 54) which states: "planning policies should... incorporate features which support priority or threatened species such as swifts";</p> <p>However, there are some typos which affect clarity, and also bat bricks are mentioned - a term usually used for bat access bricks for existing buildings (e.g. search on nhbs.com to see this) - rather than the much clearer "integrated bat boxes" for new build development;</p> <p>Also it is not currently sound because there is insufficient detail about best-practice guidance to be effective and ensure suitable location and numbers of swift bricks. In more detail, further reasons for these changes are as follows: Swift bricks are a universal nest brick as already stated in the Local Plan but a little further information about that would help for clarity. Swift bricks are excluded from the DEFRA Biodiversity Net Gain metric so need a separate clear policy. Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind. Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/)). Many other local authorities are including detailed swift brick requirements in their Local Plan, such as the majority of London boroughs in their draft or adopted plans including Tower Hamlets Local Plan Regulation 19 stage (Policy B04 paragraph 18.72, https://talk.towerhamlets.gov.uk/local-plan), which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020, and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the</p>	<p>Noted. No change required.</p> <p>Change proposed to refer to "integrated bat boxes."</p> <p>No change proposed to include further detail. The policy itself aims to be concise and provide flexibility for applicants in how they can achieve the requirements. The location and number of swift bricks must be assessed on a case-by-case basis. The policy clearly states that "unless there are clearly justifiable reasons for not doing so, development must: [...] universal swift bricks."</p> <p>Change proposed.</p>

		<p>following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;"</p> <p>https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19), and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4, https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/), so such an enhanced level should also be considered. Also please add for information: Swift bricks are a significantly better option than external nest boxes as they are a permanent feature of the building with no maintenance requirements, improved thermal regulation, and aesthetic integration with the design.</p> <p>There is a typo in EN12 (c) with an extra bracket - please remove the extra bracket from "(such as wildlife ponds", and please add "and" to amend the wording to "ponds, and bird nesting and bat roosting" to make clear that the requirement to be integral within new buildings applies to bird nesting opportunities as well as bat roosting - I believe this is what it means, which would be consistent with NPPG 2019 and the reference to swift bricks, but it's currently unclear.</p>	
University of Reading	EN12	<p>The University supports the policy which requires a 10% Biodiversity Net Gain (BNG) in accordance with the mandatory levels (10%) set out in the Environment Act 2021. It is considered that this level is appropriate for an urban authority such as Reading. Robust evidence would be required to justify the inclusion of any higher requirement.</p> <p>The University acknowledges that clear guidance is required for the provision of off-site delivery of biodiversity net gain where on-site delivery is not possible. It is clear that not all sites within Reading will be able to deliver on-site BNG and so the Council must ensure it has a clear strategy and robust guidance for developers on this matter. The reference to the upcoming Natural Environment SPD and Berkshire Local Nature Recovery Strategy is welcomed and it is important that these documents are progressed quickly to ensure certainty on off-site BNG provision. The University supports the updating of the policy to reflect current guidance and legislation. This policy should reflect the provisions of the Environment Act 2021 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024 as well as the NPPF.</p> <p>The policy is not consistent with national policy as drafted and should be amended as follows:</p>	<p>Noted. No change required.</p> <p>It is not agreed that the text on irreplaceable habitats require an amendment to reflect NPPF text exactly, in part because such irreplaceable habitats are a particular rarity in an authority such as Reading, and in part because the wholly exceptional reasons in the NPPF such as nationally significant infrastructure projects are highly unlikely to arise in Reading.</p>

		“Notwithstanding the above development that results in the loss or deterioration of ‘irreplaceable habitats’ will not be permitted, unless there are wholly exceptional reasons and a suitable compensation strategy exists.”	
Woodland Trust	EN12	We welcome the inclusion of reference to the emerging Berkshire Local Nature Recovery Strategy, and support for Reading’s Green Infrastructure network, in line with NPPF paras 187 and 192. We note that the requirement for BNG meets the statutory minimum requirements of 10% but would urge consideration of a higher BNG target. By setting a more ambitious target, the Local Plan increases the chances that an average net gain of at least 10% will be delivered across the Plan area, given the possibility that some sites may not be able to deliver net gain within Reading or that initiatives intended to deliver such gain may fall short in practice. High land values and house prices in the South East mean that setting higher levels of BNG would be viable, as seen in adopted policies in other urban LPAs in the London commuter zone, including Guildford, Worthing, and Maidstone.	Do not agree. No change proposed. Although high land values are present in Reading, the area is largely urbanised and therefore significant increases to biodiversity will be very difficult to achieve in practice. According the national policy, a local BNG requirement of 20% would require clear and robust justification which the Council does not feel it can demonstrate at this time.
DP9 Ltd on behalf of SH Reading Master LLP	EN14	We support the principle of increasing tree coverage across Reading and welcome the principle of protecting existing vegetation, enhancing biodiversity, and improving canopy cover to achieve environmental, social, and climate-related benefits. However, this policy requirement does need to be considered and balanced against other policy requirements, such as public realm. To ensure the policy is effective and flexible for urban developments, we request that the policy includes supplementary text which highlights that these urban greening initiatives are considered in the context of the wider public realm and benefits of a development. The priorities should be delivered unless there are clear public benefits that justify an alternative approach. We support the policy’s flexibility to integrating tree planting within the public realm improvements and street frontages, where it can contribute meaningfully to urban design, placemaking, and the long-term sustainability of the area. It is vital, however, to ensure that increased tree coverage works cohesively with the public realm, avoiding conflicts with other policy objectives relating to accessibility, active use of spaces, and the maintenance of a high-quality urban environment.	Do not agree. No change proposed. This is already the case as applications will be considered on a case-by-case basis to ensure that the requirements of this policy are considered in tandem with other policies and that development is not rendered unviable.
Historic England	EN14	We welcome many of the proposed changes and suggest a minor amendment to the reference to heritage impacts from planting, which does not fully recognise the potential to harm archaeological remains, nor fully align with supporting paragraph 4.2.84. The level of impact of new tree planting on archaeology should be assessed on a case-by-case basis.	Do not agree. No change proposed. It is considered that “consider the historic environment” includes consideration of the potential to harm archaeological remains.
Mark Drukker	EN14	No mention of closeness of trees to buildings/ Trees should not be too close to, and damage, buildings, and should be monitored for damage.	Agree, but this is not within the scope of the Local Plan. It is not possible to

			prescribe a standard requirement for distance between trees and structures as each site is unique.
University of Reading	EN14	The University is supportive of the retention of existing trees, hedges and woodlands, and in principle the updating of this policy in line with the Reading Borough Council Tree Strategy and NPPF.	Noted. No change required.
Woodland Trust	EN14	We strongly support this detailed and robust policy on protection and provision of trees, hedges and woodland, and the improved policy wording from earlier versions of the draft plan. In particular, we support the explicit protection for ancient woodland, ancient & veteran trees; the incorporation of tree canopy targets from the Reading Tree Strategy, targeting areas of under provision and of high treescape value; integration with BNG and Local Nature Recovery Strategies; and upholding biosecurity in tree procurement. This approach is in line with the NPPF; it will also make a positive contribution to statutory requirements for net gain and nature recovery and reflects the aspirations of the England Trees Action Plan and National Model Design Code.	Noted. No change required.
Berkshire Gardens Trust	EN14	We welcome EN14: Trees, Hedges and Woodlands as a Strategic policy. We reiterate our request for the inclusion of historically significant tree, hedge and woodland planting under item 1. These can be identified through assessments.	Do not agree. No change proposed. It is difficult to imagine a situation whereby a “historically significant tree, hedge or woodland planting” would not be considered already under the requirements of the policy.
Friends of the Earth	EN15	<p>Reading’s Air Quality is very much worse than the WHO targets for NO₂, PM₁₀ and PM_{2.5} - and UK government targets are not keeping up with the WHO. PM_{2.5} is thought to have the most serious impacts on human health – see latest AQ Action Plan. The Reading Plan refers to Reading’s Air Quality Action Plan 2015 but this has now been replaced by ‘2024 – 2029 Air quality action plan’ https://www.reading.gov.uk/climate-and-pollution/air-quality-action-plan/ but this is likely to be replaced before the end of the Local Plan term.</p> <p>While much of the PM_{2.5} will be of external origin local emissions from vehicles (braking, clutches and tyres as well as exhaust pipes) will both increase local concentrations and add to the national burden. So reduction in use of vehicles in the Borough should be required. The proposed criteria to require an AQA is not sound because in the context of both air quality and congestion 100 extra car parking spaces per development may well prove excessive ... especially if many of them were to be used by peak hour traffic ... because congestion has a non-linear response to traffic density, and air quality probably has a non-linear response to congestion and traffic density. All development within the</p>	<p>Change proposed to update reference to the most recent AQAP.</p> <p>Agree and no change required. The policies of the Local Plan are drafted to discourage private car use and provide opportunities for active travel and public transport for residents. The vast majority of development will occur in the town centre with no or very little car parking provided.</p>

		AQMA should be subject to an Air Quality Assessment if parking for motor vehicles is to be provided.	
John Sharpe	EN15	<p>This policy fails the soundness test as the target for reduction is in the past. It should refer to a target for reduction in the future. DEFRA provides the following guidance:</p> <p>Interim Planning Guidance on the consideration of the Environment Act PM2.5 targets in planning decisions The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 set two new targets for fine particulate matter (PM2.5):</p> <ul style="list-style-type: none"> •A maximum annual mean concentration target of 10µg/m3 to be achieved by 2040 (the AMCT); and •A population exposure reduction target of 35% compared to 2018 to be achieved by 2040 (the PERT). 	No change proposed. It is considered that re-stating specific targets from the Environmental Act is not necessary within the Local Plan.
Wokingham Borough Council	EN15	Policy EN15 suggests that “Development should have regard to the need to improve air quality...” This narrow definition omits situations when transport ‘proposals’, intended to reallocate road-space to deliver bus priorities, contribute to additional congestion or result in longer fossil fuelled trips. Whilst WBC will generally support proposals to deliver more sustainable travel patterns, Policy EN15 should be changed to “Proposals should....” so that all proposals are required to achieve the same policy objective.	No change proposed. It is unclear what additional benefit this change would provide.
Environment Agency	EN16	<p>We have reviewed policy EN16 Pollution and Water Resources. From a water resource perspective, we are pleased to see that any new development will have water neutrality in mind and will therefore be built to the specifications shown in Table 2.2 Part G of the Building Regulations. Furthermore, we endorse the encouragement the local plan gives for developers to utilise the environmental incentives offered by Thames water. These steps are particularly important as Reading is located in a water stressed area – a fact that included in the local plan.</p> <p>We are of the opinion that the wording of Policy EN16 could further be strengthened to ensure the quality of the water environment in Reading is protected and enhanced as required in NPPF paragraphs 187 and by the Water Framework Directive. For these reasons given above, we therefore consider that the local plan is not sound as it is not justified, effective and consistent with national policy. The policy must explicitly refer to ensuring that development will not lead to a deterioration of the Water Framework Directives and ensure that adequate infrastructure is in place to support additional growth.</p> <p>Although we consider the aspects of Policy EN16 which relates to water quality and resources to be adequate, we note that the evidence to back this policy where the protection of the water environment from proposed growth and development is concerned, is not available. An up-to-date water cycle study would drastically increase our confidence</p>	<p>Noted. No change required.</p> <p>No change proposed. Policy EN16 was not identified for review within the Local Plan Partial Update and it is unclear what additional benefit the suggested changes would bring in practice.</p> <p>A Water Quality Assessment has been completed. It concluded that for wastewater treatment capacity the projected development within the Local Plan Partial Update can be accommodated in the area</p> <p>No changes proposed. Policy EN16 was not identified for review within the Local Plan Partial Update and it is unclear what additional benefit the</p>

		<p>that the plan has been written with the best evidence and understanding of the local water situation that the proposed growth can be accommodated where water provision and wastewater disposal is concerned. Without this evidence further development and growth in Reading would have a detrimental impact on the water environment which is contrary to NPPF paragraph 187. The updated evidence would also help strengthen any future policies and decisions made by the council. The Water Cycle Study will demonstrate if there is enough wastewater capacity for new development. The state of the Reading STW could result in significant environmental damage. The assessment made by RBC of the remaining headroom at Reading STW is inaccurate and there is a risk that capacity issues at the Reading STW could impact growth during the Local Plan period.</p> <p>Policy EN16 on pollution prevention should be reworded as follows:</p> <ul style="list-style-type: none"> • By adding reference to land quality and groundwater in the policy itself; • By adding reference to contamination of land and/or controlled waters) in the policy itself. • Various changes to the supporting text to further clarify terms (see full representation). 	suggested changes would bring in practice.
Thames Water	EN16	<p>As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the Reading Borough. We generally support the reference to water and wastewater infrastructure, but it is such an important issue that it should be covered in a separate 'Water Resources and Wastewater Infrastructure' policy in the new Local Plan.</p> <p>Our response to this consultation, as part of the planning process, does not seek to address the compliance concerns raised by the Environment Agency during the Reg 18 consultation on a line by line basis. In our view, the planning process is not the appropriate forum for regulatory concerns to be addressed, because the planning process should look at "preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability" [Paragraph 187 NPPF, December 2024]. We are, and will, continue to address any regulatory concerns raised by the Environment Agency directly and within the appropriate forums.</p> <p>In light of the above comments and Government guidance we consider that the New Local Plan should include a specific policy on the key issue of the provision of 'Water Resources/Supply and Sewerage/Wastewater Infrastructure' to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We therefore recommend</p>	<p>Do not agree. It is unclear what additional benefit a separate policy would bring.</p> <p>Noted. No change required.</p> <p>It is unclear why the current proposed policy would prevent identification of infrastructure.</p>

		that there is a separate policy to cover both 'Water Resources & Wastewater Infrastructure'.	
Savills on behalf of British Oxygen Company	EN17	<p>The wording of Policy EN17 is as follows:</p> <p><i>"Where noise generating equipment is proposed, the noise source specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor."</i></p> <p>Whilst the wording of Policy EN17 has not been changed in this draft Local Plan update, BOC is concerned that with nearby proposed site allocations (SR2, SR3, and SR4c) having their indicative dwelling capacity increased from their previous agreed value, this could lead to an increase in noise mitigation required and an expectancy from noisier commercial/ industrial businesses to change their operations to respect newer residential units.</p> <p>While BOC does not object to the densification of the allocations, this could restrict BOC's operations more if there is an increased number of units that have the potential to be impacted by existing businesses. Restricting any of BOC's future development for noise-generating equipment to be "at least 10dBA below the existing background", would significantly impact the potential business growth of the site.</p> <p>To prevent Policy EN17 from potentially hindering BOC's ability to grow its business and operations at this site, any nearby planning application that would be impacted by noise generation should include noise mitigation to reduce this impact as part of the proposed development.</p> <p>As such, for this policy to be justified, it should be amended to have a consistent approach to noise-generating equipment and to allow for reasonable alternatives or variations for the provision of new noise-generating equipment. The wording of Policy EN17 should therefore be changed to the below:</p> <p><i>"Where noise generating equipment is proposed, the noise source specific level (plant noise level) should be (where possible) at least 10dBa below the existing background level as measured at the nearest noise sensitive receptor."</i></p> <p>Where new residential allocations are proposed nearby, such as SR2, which if built could potentially become the nearest 'noise sensitive receptor' to BOC's site at Rose Kiln Lane, BOC believe that, as an existing use, the onus should instead be on the developers of the new residential sites to provide enough noise mitigation to prevent noise pollution from existing uses impacting the amenity of any future residents.</p>	<p>Do not agree. No change proposed. EN17 was not identified for review under the Partial Update. Moreover, due to the significant negative impacts of noise or residential amenity and health, it is not considered appropriate to amend the policy as suggested. Under the Building Regulations Part E, developers are required to consider and mitigate noise in order to create comfortable environments for residents.</p>

Environment Agency	EN18	<p>We acknowledge the updates to policy EN18 and are pleased that the policy has taken into account all of our comments from our letter dated 30th September 2024. We welcome that paragraph 4.2.112 clearly states when a Flood Risk Assessment (FRA) will be required. We also welcome the policy summary that states that an FRA shall consider all sources of flood risk, and the requirement for the application of the sequential and exception tests. We welcome the wording of paragraph 4.2.114 which clearly states the development that is permissible within Flood Zone 3b (the functional floodplain), including its reference to the redevelopment of brownfield sites. We welcome that climate change, an important consideration for all development, is included throughout the policy. We welcome the clear requirements for developments to ensure that they do not result in a loss of floodplain storage and, where possible, seek to increase floodplain storage. We also welcome the requirement for developments to ensure that flood flows are not impeded. Both of these are required to ensure that the exception test can be passed, which is a requirement of the NPPF. We welcome the wording of paragraph 4.2.112 and the policy summary which states that developments must be demonstrated (via a site-specific FRA) that they are safe for their lifetime and will ensure the safety of the occupant, with particular reference to resilient design and the raising of floor levels. We welcome paragraph 4.2.115 which clarifies the need for regeneration being compared against flood risk. We are particularly pleased that the sequential and exception tests are considered in this section. We welcome that a new Level 1 SFRA has been prepared.</p> <p>For the purpose of clarity, the strength of the wording in paragraph 4.2.113 could be improved. We suggest that the sentence “...different allowances should be taken into account...” is worded more strongly: “the appropriate allowance must be taken into account in the developer’s FRA”.</p> <p>Whilst Policy EN18 is adequate, the evidence supporting the policy is not up to date. We have therefore had to raise a soundness point in regard to this policy. As set out within our policy and allocation-specific representations, a sequential test (which assess sites against all sources of flooding (not just fluvial)) will be required to support the SFRA Level 1 and demonstrate that the sites allocated for development in the local plan are deliverable/developable. Sites which pass the sequential test and are allocated in the local plan would then need to pass the exception test through the production of the Level 2 SFRA. Please refer to our comments in the representation form.</p>	<p>Noted. No change required.</p> <p>Change proposed.</p> <p>An SFRA Level 2 has now been published.</p>
Matt Rodda MP	EN18	<p>The plan acknowledges that a significant area of land within Reading is at risk of flooding, and that flooding is expected to worsen with the effects of climate change. The plan therefore stipulates that development will be directed to areas at lowest risk of flooding in the first instance and planning permission will only be granted where proposals have fully considered the effects of flooding from all sources.</p>	Noted. No change required.

		I am pleased that Reading's waterways and waterside spaces will be protected and enhanced, so that they can continue to contribute to local and regional biodiversity and ecology, flood mitigation, local character, heritage and visual amenity, and provide leisure and recreational opportunities.	
Thames Water	EN18	In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". We therefore support the new reference to sewer flooding in Policy EN18	Noted. No change required.
Woodland Trust	EN18	We support this policy, in particular that SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. This is in line with NPPF para 164a.	Noted. No change required.
Churchill Living	EN19	To ensure the requirements of this policy are in line with national legislation, and do not come to as a detriment to the delivery of specialist housing, we recommend the following addition to Policy EN19: "Applications that can demonstrate a +10% BNG, in line with national legislation and Policy EN12, as well as incorporate SUDs features in accordance with Policy EN18, achieving the appropriate Urban Greening Factor will be supported by the Council."	It is unclear what is meant by this recommendation. UGF is an additional requirement to BNG and will be considered separately.
DP9 Ltd on behalf of SH Reading Master LLP	EN19	We note the proposed new policy requires development to demonstrate how an appropriate proportion of green cover will be delivered on site through an Urban Greening Factor (UGF) assessment. We support the principle of enhancing urban greening within developments in Reading. The Station Hill development has already adopted many Urban Greening principles. However, the policy should highlight that the requirement applies to new full planning applications only. As explained, Phase 3 of Station Hill benefits from an outline planning consent that includes parameter plans, a Development Specification and a Design Code. These already include the need for generous open space and the landscape design that will be developed in consultation with RBC planning and design officers. It is inappropriate for new policy to be applied to past outline planning consents where a detailed Design Code has already been approved. It is therefore requested that it is clearly stated that the requirement for a UGF assessment applies only to new full or outline planning applications (and not apply retrospectively to RMAs).	Noted. No change proposed. Reserved matters applications will be determined against the principles in the outline consent as is usual practice. Nothing in this policy implies that it should differ from other plan policies in terms of how it is applied to existing outlines.
Stantec on behalf of SEGRO plc	EN19	SEGRO objects to the introduction of Policy EN19 in the Pre-Submission Draft. The rigid requirements to deliver a certain percentage score of Urban Greening Factor for different types of development places a significant burden on development.	Do not agree. This policy and all sustainability policies within the draft were subject to testing in the Whole

		In addition, the viability of this new policy has not been tested and SEGRO consider that this constraint on development would make the plan undeliverable and prevent otherwise sustainable development that accords with the other policies of the Draft Local Plan from coming forward. For the Plan to be 'justified' in accordance with Paragraph 35(b) of the NPPF, SEGRO strongly recommend Policy EN19 and consequently Appendix 3: Urban Greening Factor are removed entirely.	Plan Viability Study. The UGF is reflective of adopted policy within London and based on best-practice guidance from Natural England.
Stantec on behalf of St Edwards Homes Limited	EN19	We support the Council in seeking to achieve green coverage in the Borough, however it will be important that Policy EN19 does not unnecessarily inhibit development, especially when considered alongside biodiversity net gain requirements. The provision of a 10% biodiversity net gain will result in additional green coverage, unless a site is exempt. The evidential basis for imposing, as opposed to encouraging, additional provision is therefore unclear. We therefore do not consider the policy to be sound. If a policy requiring urban greening is considered necessary, to ensure that the policy does not inhibit development, it will be important that the score required is based on a realistic understanding of what can feasibly be delivered by development. We consider that additional work is necessary to establish scores that can feasibly be provided (on all potential types of development) before a policy requirement is imposed. In the absence of sufficient evidence, the soundness of the policy as drafted is questioned. Policy should also recognise that there will be some circumstances where the provision of a sizeable quantum of additional green coverage may be unachievable, for example on small, high-density developments. In the context of the development needs of the Borough, there is therefore a need for flexibility so that the land available for development can be used efficiently. Such flexibility is afforded in respect of biodiversity net gain, for example by enabling off-site provision where necessary, and so not having any flexibility in Policy EN19 could lead to development being inhibited.	Do not agree. This policy and all sustainability policies within the draft were subject to testing in the Whole Plan Viability Study. The UGF is reflective of adopted policy within London and based on best-practice guidance from Natural England.
Turley on behalf of The Oracle Limited Partnership Group	EN19	It is requested that Policy EN19 Urban Green Factor is reviewed to ensure the requirements are not unduly onerous upon large scale and brownfield / urban development, thereby rendering them undeliverability in already challenging viability climate.	Do not agree. This policy and all sustainability policies within the draft were subject to testing in the Whole Plan Viability Study. The UGF is reflective of adopted policy within London and based on best-practice guidance from Natural England.
University of Reading	EN19	The University supports the principle of improving the provision of green infrastructure within the Borough, however it is important that policy EN19 does not unnecessarily constrain development. There are several other related policies in the plan which have similar and connected aims including policies on green space, open space, biodiversity, trees, hedges and woodland. It is important that the inclusion of this policy requirement is considered alongside the cumulative requirements of these policies. The mandatory	Do not agree. This policy and all sustainability policies within the draft were subject to testing in the Whole Plan Viability Study. The UGF is reflective of adopted policy within

		<p>provision of a 10% biodiversity net gain (apart from sites that are exempt) will result in the provision of additional green infrastructure in order to achieve BNG. The evidential basis for imposing the provision of additional green infrastructure is therefore unclear. The supporting text at paragraph 4.2.125 that clarifies that “requirements of UGF are not to be used in place of other policy requirements, such as the requirements for mandatory BNG or any requirements through Policy EN12 is welcomed and this is an important distinction that should be absolutely clear in the supporting text.</p> <p>The UGF score required for different development types needs to be appropriately evidenced and justified. No evidence for the different types of development or target scores has been identified. The scores must be based on an understanding of what can feasibly be delivered by development and must be tailored to different types of development. It is not considered that there is sufficient evidence for the scores required for different development types within the proposed policy. For example, the requirement to achieve a score of 50% on non-householder applications that are BNG exempt is very onerous. There are very clear reasons why certain developments are BNG exempt, one of which being that not all development can feasibly provide green infrastructure to provide BNG on site. In the absence of sufficient evidence, it is not considered that the policy as drafted is justified and therefore sound.</p> <p>The policy should recognise that the provision of a sizeable quantum of additional green infrastructure may be unachievable on certain sites, for example on small, urban, high-density developments or applications for changes of use. There is therefore a need for flexibility so that the land available for development can be used efficiently. Such flexibility is afforded in respect of BNG, for example by enabling off-site provision where necessary, and policy EN19 should incorporate reasonable flexibility to ensure that development is not constrained. It is considered that the UGF should therefore only apply to major development.</p> <p>The Natural England Report notes that the majority of existing UGF planning policies provide target scores for major development only. In order for the policy to be effective and not constrain delivery of development, it is considered that the policy should be amended as below to reflect this:</p> <p>“Proposals for major development must demonstrate how an appropriate proportion of green cover will be delivered on site through an Urban Greening Factor (UGF) assessment. This may include both existing and newly established landscaping.”</p>	<p>London and based on best-practice guidance from Natural England.</p> <p>If the policy were limited to major development only it would miss many potential opportunities for introduction of urban greening in Reading.</p>
Woodland Trust	EN19	<p>We strongly support this policy, which is a welcome addition to the plan from earlier drafts. Supplying a local metric for more urban/brownfield sites is an effective complement to</p>	Noted. No change required.

		BNG requirements: such sites may already have an extremely low level of biodiversity and therefore a percentage increase may not in practice deliver significant enhancements. Urban Greening Factors have been successfully adopted in other LPAs including the London Plan. Such policies are line with NPPF 125 encouraging the use and remediation of brownfield sites.	
Berkshire Gardens Trust	EN19	We very much welcome policy EN19: Urban Greening Factor. The need for adequate open space was raised in our letter in January 2024. This policy will contribute towards providing adequate open space for new residents and take the increasing pressure off the existing, often fragile, historic open spaces.	Noted. No change required.
Stantec on behalf of Aviva Life & Pensions UK Ltd	EN19	As per our comments in relation to the earlier CC policies, the suggested new Policy EN19 is not supported. Its requirements will place significant additional burden on the viability of all development schemes (note: it does not just apply to major schemes) and have the consequence of stifling development. The general approach and detailed wording of the policy is inconsistent with the governments stated aims and objectives, overlaps with other landscaping and ecology policies within the Plan, and has not been appropriately justified. As a result, the policy as currently worded is not sound and should be deleted.	Do not agree. This policy and all sustainability policies within the draft were subject to testing in the Whole Plan Viability Study. The UGF is reflective of adopted policy within London and based on best-practice guidance from Natural England.
Turley on behalf of CBRE Investment Management	EN19	Whilst in principle CBRE IM support the aspirations of this policy, further clarification and guidance is necessary around the requirements the policy and justification for 25% increase for major commercial developments, or in scenarios where more than 60% of the land is hard surfacing. And as such object to the drafting in the current form. These are onerous requirements that will impact on development densities and at this time do not appear evidence based and justified. Flexibility and clarification is therefore required, particularly noting that other authorities, such as Wycombe District Council, adopted similar requirements in their local plans and they have had significant negative implications on deliverability and viability of developments.	Do not agree. This policy and all sustainability policies within the draft were subject to testing in the Whole Plan Viability Study. The UGF is reflective of adopted policy within London and based on best-practice guidance from Natural England.
Matt Rodda MP	EM1	The plan highlights Reading's important role as the largest population and employment centre in Berkshire, which is one of the economic powerhouses of the UK. It rightly identifies scope to strengthen the role of Reading as the hub for the Thames Valley, providing an accessible focus for the development of employment, housing, services and facilities.	Noted. No change required.

		<p>I am pleased that the plan supports the continued strong economic growth that is expected in our area with a proposed net increase of office floorspace, warehouse space, and research development space across the borough.</p> <p>An emphasis is also placed on the need for a range of types and sizes of units to ensure a healthy and balanced local economy. Efforts will also be made to ensure the continued viability and vitality of the town centre and the network of district and local centres in Reading</p>	
Stantec on behalf of SEGRO plc	EM1	<p>SEGRO support that the amendment to Policy EM1 which increases the Borough's employment need over the Plan period to 167,000 sqm of industrial, warehouse and/or research and development space. This is broadly in-line with the Council's estimate that there has been an increase in industrial and warehouse space of around 20,000 sqm since the Reading Local Plan was adopted. However, this still leaves a substantial amount of industrial and warehouse space to be delivered over the Plan period. Since the evidence base prepared for the now adopted Plan was prepared market conditions have changed whereby industrial and warehouse occupiers are now seeking modern space, often with larger footprints and taller buildings than existing stock. These factors should be reflected in Policy EM1.</p>	No change proposed. The need figure is derived from a new Commercial Development Needs Assessment which takes account of up to date requirements.
West Berkshire Council	EM1	<p>As RBC are aware, WBDC has unmet employment floorspace needs over the LPR plan period to 2041. We note that whilst the LPU proposes to meet the identified needs for office and industrial / warehouse in full, the levels of need identified within the LPU are before the application of a safety margin and an allowance for future losses. It is also noted that there is no scope for unmet needs from other authorities to be accommodated.</p>	Noted. No change required.
Wokingham Borough Council	EM1	<p>WBC notes the statement within paragraph 4.3.5 that there is scope to accommodate the full level of employment need within Reading Borough.</p>	Noted. No change required.
Bracknell Forest Council	EM1	<p>Policy EM1 is now proposed as a strategic policy, with the net need for office floorspace being reduced to between 30,000 to 86,000 sqm (N.B. there is a typo in 30.000), and the net need for industrial, warehousing and/or research/development floorspace increasing to 167,000 sqm by 2041. The evidence to support these figures is in the updated 'Commercial Development Needs Assessment' (N.B. a reference remains to the EDNA in paragraph 4.3.4). Changes proposed to the Monitoring Framework are consistent with this latest evidence. Paragraph 4.3.5 confirms that there is scope to accommodate all identified needs, and the proposed deletion of the 'calculating employment need figures' box is consistent with other proposed changes in the supporting text.</p>	<p>Change proposed to correct typo.</p> <p>Change proposed to remove reference to the EDNA is 4.3.4.</p>

Stantec on behalf of Aviva Life & Pensions UK Ltd	EM1	Aviva supports Policy EM1, however notes that the figures quoted within the Policy relating to office floorspace is inconsistent with the floorspace figure quoted at paragraph 3.2.4.	No change required. The figures stated in 3.2.4 refer only to Central Reading.
Turley on behalf of CBRE Investment Management	EM1	<p>It is noted that the above findings, categorised into respective use classes, are not fully translated into Policy EM1 of the LPU. CBRE IM consider that this breakdown of requirements is critical to the soundness of this Policy insofar as it identifies measurable targets and monitoring objectives that would deliver an identified need. At present the wording of Policy EM1 seeks to combine industrial warehouse and research and development uses without a greater appreciation of the requirements of each respective use class, the market requirements (including operational standards for such buildings), their locality, functionality, and allowance for growth of start up and 'maker units' respectively.</p> <p>Noting that this document remains in draft CBRE IM reserve the right to respond to further evidence as and when it becomes available.</p>	It is not agreed that this needs to be broken into individual use classes. The reality of permissions for new employment development in Reading are that they are often flexible permissions involving B2, B8 and some classes within E. These sites can therefore move between these use classes as required without further permission, and monitoring progress against the levels of specific use class would be almost impossible.
National Highways	EM2	M4 Junction 11 has limited capacity to accommodate increasing amounts of vehicular travel. National Highways can only comment on the proposed new employment development after modelling including M4 Junction 11 has been undertaken. Flow, and potentially delay and queuing changes, through M4 Junctions 10 and 12 should also be supplied.	Noted. The transport modelling, which was provided to National Highways as a draft for comment, forms part of the submission evidence.
West Berkshire Council	EM2	It is recognised that two of the Core Employment Areas are existing designations in the RBC Local Plan – EM2a Green Park and EM2b North of M4. When originally designated these two employment areas were not located within the Detailed Emergency Planning Zone for the AWE, Burghfield, however, since the Zone has been expanded, they are now located within it. The Council has concerns that any development within this area may lead to additional 'population' and intensification in an area in close proximity to the AWE sites, placing more stress on the AWE Off-Site Emergency Plan which is already significantly under stress. There is therefore an inherent tension in the Plan regarding development within the DEPZ which we consider needs to be addressed.	No change proposed. Core Employment Areas have two purposes – protecting existing land and a focus for further development. Retaining existing land will still be of great importance. However, all development, whether or not in a CEA, will require compliance with OU2.
Turley on behalf of CBRE Investment Management	EM2	The wording of this policy remains unchanged. CBRE IM do not wish to make any comments on this policy other than to support its underlying principle in directing major employment uses (non-office), including industrial and storage and distribution will be located in the A33 corridor or in the Core Employment Area.	Noted. No change required.
Turley on behalf of CBRE	EM4	The wording of this policy remains unchanged. CBRE IM do not wish to make any comments on this policy other than to support its underlying principle that range of types	Noted. No change required.

Investment Management		and sizes of units should be present in the Borough and that the amendments to Policy EM1 be revised to account for the identified respective needs of certain Class E uses to support the effectiveness of this policy as currently written.	
Bracknell Forest Council	H1	<p>The current plan covers the period 2013-2036. Policy H1 includes a requirement for 689dpa over the plan period. The updated Plan covers the plan period 2023-2041. Updated Policy H1 includes a housing requirement of 825dpa (14,850 total over the plan period), which relates to the capacity of sites in the 'Housing and Economic Land Availability Assessment' (2024). The updated Policy H1 is less than the local housing need based on the national standard method of 878dpa (15,804 over the plan period, including a 35% urban uplift, based on the December 2020 guidance). However, Reading Borough Council has undertaken its own housing needs assessment (ORS, July 2024) which identifies a need for 735dpa (13,230 total over the plan period). The NPPF (para. 61, December 2023 version) allows for exceptional circumstances for a local assessment of need. The local assessment uses alternative population and growth assumptions which are more applicable to local circumstances. BFC has no objection to the approach proposed for deriving the local housing need figure, as it is agreed that the 35% uplift for Reading results in a figure which does not fully relate to local need. Furthermore, Policy H1 identifies a greater requirement than set out in the ORS local assessment of housing need (difference of +1,620 dwellings), with the aim of boosting housing delivery.</p> <p>However, BFC has concerns about how the remaining need (once existing commitments have been deducted) will be addressed in the Plan. The table at para. 4.4.5 (page 100) identifies a remaining need of 6,428 homes. However, the same table (page 101) sets out that sites identified in the plan amount to a capacity of 5,110-7,470 homes. Whilst there is no objection to the principle of identifying a capacity range for each site, if only the minimum range for each allocated site is achieved, this would result in a shortfall of 1,318 homes against Policy H1. Some assurance is sought that the identified sites will meet the requirement in Policy H1 to avoid the issue of unmet need.</p> <p>BFC notes that there are supporting policies on increasing densities of development in locations which are highly accessible by public transport, as well as walking and cycling.</p>	<p>Noted. No change required.</p> <p>In terms of the range and the consequences of this for paragraph 4.4.5, the main assessment of the likely capacity for the site is the HELAA, which is the basis for the 825 dwellings per year figure. The HELAA therefore provides this reassurance. The ranges are applied to the capacity figure that emerges from the HELAA to give some flexibility within the policy. In the Council's experience, developers generally seek to deliver towards the higher end of the range as a starting point, and it is almost inconceivable that every site would be brought forward at the low end of the range. However, at an individual site level some flexibility is required otherwise the wording of the relevant policy may prevent a site being brought forward where there are particular circumstances.</p>
DP9 Ltd on behalf of SH Reading Master LLP	H1	We support the principle of Policy H1, which seeks to address Reading's urgent housing needs through the provision of a significant number of new homes during the plan period. The proposed target of 15,847 homes (equating to 825 homes per annum) reflects both the scale of local housing need and the borough's capacity to deliver.	Noted. No change required.
Gladman	H1	Whilst it is then acknowledged that the number of homes which the updated plan provides for has been uplifted to 825 dpa to reflect capacity (see further analysis of this below),	This figure is not intended to address unmet need from neighbouring

		thereby indirectly dealing with some of the unmet need from surrounding authorities, it is considered that this figure is still too low, noting that it is derived from RBC's commissioned assessment of housing need. It will be necessary to test this figure through the Examination process, to ensure that it is appropriately evidenced, taking account of cross-boundary housing and other development needs.	authorities. It is not considered that the figure is still too low, as set out in the Housing Needs Assessment.
Home Builders Federation	H1	<p>The Council are proposing to increase the housing requirements to 825 dpa across the period 2023 to 2041. This requirement is a capacity constrained requirement and is 52 homes short of the 878 dpa arrived at using the standard. The HBF recognises that Reading is a highly constrained with the Council's boundary being drawn close to the urban edge. In setting a housing requirement of 825 dpa the Council would appear to be basing its plan on the 878 dpa arrived at using the standard method the Council claims at paragraph 4.4.3 that the actual need in the area is 735 dpa and there are exceptional circumstances for in Reading that justify using the local assessment need rather than the standard method. HBF do not disagree with the Council's premise the baseline housing need is higher than the standard method without the urban uplift. However, the Council's position for using an alternate method would appear to be based principally on the point that it does not agree with the use of the urban uplift was this results in a housing need figure that is too high.</p> <p>Firstly, it is important to acknowledge that the changes being proposed to the standard method would see local housing needs increase to 1,023 dpa – significantly higher than either the current standard method or the Council's own assessment of needs and an indication as to the level of delivery expected in Reading by the Government. It also gives an indication as to the level of unmet housing needs that will need to be addressed in neighbouring areas.</p> <p>Secondly, the application of the urban uplift is not meant to be directly related to the needs of Reading. It is applied to increase delivery in urban areas in order to ensure that more homes were built on previously developed land and focus more new development where there are existing infrastructure and services. It was therefore about increase delivery in these areas rather than about meeting the specific needs or those urban areas. Therefore, the HBF would argue that just because identified needs are lower there is no justification for using an alternate method in these specific circumstances and would recommend that paragraph 4.4.3 is deleted as it is unjustified.</p> <p>As to whether the Council's requirement reflects supply capacity over the plan period the HBF cannot comment as it does not promote sites. However, Council must ensure that it has left no stone unturned as to potential sites or whether there is capacity on allocated sites to do more than is being proposed.</p>	<p>No change proposed</p> <p>The case for exceptional circumstance with regard to the urban uplift with the Housing Provision Background Paper, but the principal reason is around the effects of the demographics for Reading.</p> <p>It is worth noting that, since April 2025 affordability figures were produced, the standard method actually now results in a figure (822) that is slightly lower than the intended delivery (825).</p> <p>The Council recognises that the new December 2024 NPPF results in an increased need for housing, but under transitional arrangements this does not apply to this Partial Update.</p> <p>The underlying intention of the urban uplift is understood, but it fails to grasp that there is not unlimited capacity within those 20 urban areas to make up for the rest of the country, and the Council considers it has demonstrated that there is a limit to the capacity that exists within Reading. The plan seeks to deliver over and above its locally-assessed need.</p>

		<p>HBF would also have expected further information to be provided on the expectations for each site in order for all parties to properly consider whether the rate of delivery on each site is justified. It is our experience that where site by site trajectories are not provided, they are asked for by inspectors in order to ensure effective scrutiny of the local plan. For more information on what is expected we would refer the Council to the Preliminary Questions published recently by the inspector examining the Bristol Local Plan. Question 62 and Appendix 1 provide some indication of the detail required. Rather than wait to be asked we would suggest that such a trajectory as part of the evidence supporting the submitted local plan.</p> <p>There also appears to be an inconsistency between the windfall allowance included in the housing trajectory and the council's evidence. Delivery on small scale unidentified sites (commonly referred to as windfall) in housing trajectory in Appendix 1 does not reflect the evidence in the HELAA which recommends at paragraph 4.8 that over the plan period this level of supply will deliver around 1,500 homes. It is not clear why a different figure has been used and the trajectory should be updated to reflect the Council's own evidence.</p> <p>Turning to the period over which homes are to be delivered, the Council are proposing to amend this to 2023 to 2041. As set out earlier in our representations the HBF do not consider this to be sound. While the Council are setting a capacity constrained figure this is based on an assessment of housing needs with a base period 2024 to 2034. It is the HBFs' position that the period over which housing needs should be considered should start from the year in which needs are assessed. This approach reflects the fact that the standard method is a forward-looking assessment of housing need that takes into account past under or over delivery through the affordability adjustment. H1 should therefore be amended accordingly. As the Council requirement is constrained by supply this will reduce the total number of homes to be delivered and also the annual requirement. Using the housing trajectory in appendix 1 annual delivery using a sound plan period would be 813 dpa and total delivery reducing to 13,818 home – subject to no further sites being added or capacity on other sites being amended.</p>	<p>A full site by site housing trajectory is included in the Housing Implementation Strategy.</p> <p>It is noted that there is an error in the Housing Trajectory in Appendix 1. The trajectory has been corrected in the submission version. This error does not affect figures and expectations elsewhere.</p> <p>The Council's housing needs have been assessed on the basis of the period 2023-2041 in the Housing Needs Assessment, not the 2024-2034 period which is relevant to the standard method.</p>
Lichfields on behalf of Tilehurst People's Local Charity	H1	<p>In summary, our clients consider the list of reasons given by RBC within the Housing Provision Background Paper (November 2024) does not in any way demonstrate that there are "ECs" that justify deviating from the SM (as per NPPF December 2023) for the purposes of assessing housing need in Reading. RBC's key issue with the SM (as per NPPF December 2023) appears to be an "in principle" objection to the urban uplift on the basis of whether it can realistically be achieved, but its evidence does not support this case. A simple comparative analysis shows the rate of growth in Reading under the SM (as per NPPF December 2023) is 1.2%, which is entirely reasonable (in the context of</p>	<p>Do not agree. This ignores the main part of the exceptional circumstances case which is around UPC, as made clear in the Housing Provision Background Paper. Nonetheless, the case in relation to the urban uplift,</p>

		<p>historic delivery in Reading itself and other similar urban areas), and this sits comfortably amongst the ‘average’ rate of growth for the other top 20 urban areas. Our client’s position is that ECs have not been demonstrated, and the LPPU19 should plan for at least a housing need aligned with the SM (as per the NPPP December 2023). This creates the need to identify further sites to meet this shortfall across the plan period (954 homes). It also increases the importance of ensuring that the delivery of residential development at site allocations such as our client’s sites at Land at Kentwood Hill (Policy WR3s) and Land at Armour Hill (Policy WR3t) is not unduly fettered. Irrespective of the conclusion regarding ECs, Policy H1 should plan for a housing requirement higher than the currently assessed capacity figure of 825 dpa in order to realise the Council’s aims to “address the housing crisis and to reflect national policy” (LPPU19, para. 4.4.4).</p>	<p>detailed in full in that paper, remains robust in our view.</p>
<p>Lichfields on behalf of USS Investment Management Limited</p>	<p>H1</p>	<p>For the reasons outlined, our client considers that the LPPU19 is unsound and not legally compliant for the following key reasons:</p> <ul style="list-style-type: none"> • RBC has not demonstrated ECs to justify deviating from the SM (as per NPPF December 2023) in determining its housing need. The proposed approach to plan for a level of housing lower than the SM figure (as per NPPF December 2023) is inconsistent with NPPF (December 2023) para. 8b, 11a, 11b, 61 and 62 and thus not considered sound. The plan is not positively prepared as it does not provide “a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs” (NPPF (December 2023) para. 35) and is therefore unsound. In the absence of ECs to justify deviating from the SM (as per NPPF (December 2023)), RBC should adopt, as a minimum, a housing requirement figure based on the SM figure (incorporating the 35% urban uplift). Even if the ECs presented are considered sufficient to justify deviation from the SM (as per NPPF (December 2023)) to plan for a level of housing lower than the SM figure (which our client does not accept), RBC should seek every opportunity to plan for a housing requirement higher than the currently assessed capacity figure of 825 dpa in order to realise the Council’s aims to “address the housing crisis and to reflect national policy” (LPPU19, para. 4.4.4). • RBC has failed to comply with the legal duty-to-cooperate given the absence of effective engagement with SODC and VoWH over, and agreement of accommodating unmet needs from Reading should this arise. This is contrary to the approach set out by paragraph 26 of the NPPF (December 2023) and represents a failure to work effectively with neighbours on strategic matters, and a failure of the duty-to-cooperate. The failure to comply with the 	<p>Do not agree. The exceptional circumstances case is set out in the Housing Provision Background Paper and the Council considers that this is robust.</p> <p>It is not clear why it is contended that the duty to co-operate has been failed. The duty to co-operate is not a duty to agree. The Duty to Co-operate Statement sets out the measures undertaken to comply with the duty and it is worth noting that the Council made a formal duty to co-operate request to SODC regarding unmet needs should the standard method be used.</p> <p>These sites are discussed further in responses with regard to specific site allocations.</p>

		<p>Duty to Cooperate cannot be addressed retrospectively. RBC should seek to plan for the level of housing need identified based on the SM (as per NPPF (December 2023)) and fully explore the development potential of brownfield sites to accommodate this level of housing need so that no agreement with neighbouring authorities over unmet needs is necessary.</p> <p>One such opportunity is provided by our client's sites at Aquis House (Policy CR14t) and 33 Blagrove Street (Policy CR14u), which are located opposite Reading Railway Station, represent such exceptionally accessible brownfield sites. They have the potential to deliver a substantially higher quantum of development than the LPPU19 considers, for the reasons set out in our responses to Policies H2, CR10, CR14t and CR14u.</p>	
Martin Robeson Planning Practice on behalf of Tesco Stores Ltd	H1	<p>While the Partial Update does appear to recognise that there is a significant need for housing, Strategic Policy H1 sets out that provision will be made for 825 dwellings per year over the plan period, significantly below the 1,028 figure set out above. This appears to lie marginally above the threshold for transitional arrangements set out within Annex 1 of the National Planning Policy Framework (NPPF). However, it is not considered that the reduced housing need figure of 825 homes per year, and its significant departure from the objectively assessed Local Housing Need calculated by the standard method (1,028), has been sufficiently justified.</p> <p>While Policy H1 and its underlying evidence base attempt to justify the reduction by reference to the constraints and limited capacity in the Borough (and the urban uplift formerly applied), it is considered that this limited capacity arises from the failure of the Plan to maximise density on proposed allocated sites, particularly in the Central Reading Area. The Plan recognises that Central Reading “represents the most significant opportunity to accommodate new development” and that there is “undoubted physical capacity within the centre to incorporate a significant level of new development, by efficient use of underused land through carefully developing at higher densities” (5.2.15). However, this positive strategy does not appear to have been carried forward in the determination of development capacities at proposed allocated land, particularly in terms of the way in which the site capacities have been calculated through the HELAA process.</p>	Do not agree. It is considered that the HELAA makes robust assumptions about density in relevant locations including the town centre. It is not clear what the changes sought to densities are and on what they would be based, other than that they should simply be higher.
Matt Rodda MP	H1	The plan responds to the findings of the Housing Needs Assessment (HNA), which was finalised in 2024 and identifies the local housing needs for Reading up to 2041, including the current and future need for affordable housing, housing for older people and those with disabilities. Whilst the HNA identified a need for 735 new dwellings each year to meet demand, the Local Plan will aim for the higher annual figure of 825 homes, as was deemed achievable by the Housing and Economic Land Availability Assessment (HELAA)	<p>Noted. No change required.</p> <p>Noted. No change required.</p>

		<p>published in 2024. I am glad that the council is being ambitious in its approach to ensuring that Reading's housing needs are met.</p> <p>The plan recognises that there is a limited amount of land in the borough to develop, and that some land will not be suitable for the purpose due to a number of factors, including the risk of flooding or the rightful protections afforded to parks and green spaces. I am therefore glad that the plan emphasises the importance of development on brownfield sites and making efficient use of the land that is available to boost the delivery of new homes. I am also pleased the plan recognises the importance of both protecting existing housing stock and reusing existing buildings, with tasteful and environmentally friendly modernisation.</p>	
Nexus Planning on behalf of Reading Heights Ltd and MYCO Ltd	H1	<p>The Council's alternative approach is to start with the 2018 based household projections, with adjustments to reflect the local circumstances, but excluding the urban uplift, to arrive at a housing need figure of 735 dpa. This is significantly below the 2023 Framework Standard Method figure of 878 dpa. In response, significant issues of soundness are identified.</p> <p>The Government has previously considered but ruled out the use of 2018 household projections to inform the Standard Method, with fundamental issues identified:</p> <ol style="list-style-type: none"> 1) that it would fail to result in anywhere near the 300,000 net additional homes target across England (notwithstanding that it may increase housing need in Reading); and 2) that it would be limited in its ability to address affordability challenges, reinforcing a feedback loop of undersupply in some of the least affordable and undersupplied housing markets in the country. <p>The Council cannot choose not to apply the uplift – it is an inherent part of the Standard Method calculation. The urban uplift was introduced in 2021 with clear and strong justification to deliver more homes on brownfield land and in areas considered to be most sustainable in terms of existing transport and social infrastructure (such as Reading); to drive structural changes to urban environments, requiring creative and most effective use of brownfield land; and to underpin a sustainable pattern of development that reduces the need for unnecessary high carbon travel.</p>	<p>Do not agree.</p> <p>The Housing Needs Assessment deals with the issues around the demographic basis for the plan. It is noted that the reasons the Government did not use the 2018 projections are nothing to do with their robustness as a projection of household growth.</p> <p>The Council is not 'choosing not to apply the uplift'. It is applying an alternative method due to exceptional circumstances, as provided for in the NPPF.</p> <p>The calculation of need is separate to any consideration of capacity. The Housing Needs Assessment does not consider capacity. This is why the actual provision figure is higher than the housing need identified in the HNA.</p> <p>Neighbouring authorities' response to the duty to co-operate request has had no influence whatsoever over the</p>

		<p>Whilst the 'Housing Provision Background Paper' (November 2024) seeks to present Reading as an outlier, a statistical anomaly when compared to other major urban areas across the country, as a reason to disapply the urban uplift, that loses sight of the purpose of the urban uplift as an important policy tool to drive the most sustainable forms of development nationwide.</p> <p>This calculation of need should be separate to how Reading's constrained supply might influence any requirement. The position of housing need is important, as if it cannot be accommodated within Reading itself, neighbouring authorities should be required to positively to work through the Duty to Cooperate to provide for that unmet need. Artificially reducing housing need (which might include any unmet need) would materially affect the ability of the Government's planning policies to provide for sufficient housing in accordance with paragraph 1 of the 2023 Framework.</p> <p>The Council's reporting that neighbouring authorities consider there is no scope to meet any unmet housing needs from Reading is not considered a robust or justified approach to lowering the starting point of Reading's housing need should be.</p>	<p>establishment of housing needs. The HNA was produced in July 2024 and the DtC request was made in August 2024.</p>
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	H1	<p>The ICB notes that the pre-submission draft sets out that provision of housing will be made for at least an additional 14,850 homes in Reading Borough within the plan period, which is equivalent to averaging 825 homes per annum). The ICB does not raise objection to the revised housing number but would urge the Local Plan to ensure primary healthcare provision and capacity can be adequate to accommodate to the population growth.</p>	<p>Noted. No change required. The Local Plan emphasises the importance of primary healthcare facilities, particularly through proposed changes to CC9 and site allocations which identify opportunities for primary care provision on specific sites.</p>
Oxfordshire County Council	H1	<p>We note that the old Standard Method included a 35% uplift added for some urban areas in England including Reading. Without that, the Standard Method calculation would have been lower than the proposed requirement of 825 dpa. Reading is the smallest of the authorities affected by the urban uplift outside of London. The new Standard Method calculations do not include 35% uplifts.</p> <p>It is our understanding that the 825 dpa figure is based on capacity within the Reading boundary. If the requirement was higher than 825 dpa, we expect that Reading Borough Council might be unable to meet that, and there would be unmet housing need. There is no agreement with any adjoining local planning authority, including those within Oxfordshire, to provide for any unmet housing need from Reading. The duty to cooperate</p>	<p>Noted. No change required.</p>

		<p>statement which accompanies this Regulation 19 consultation includes recent responses from eight local planning authorities close to Reading, including South Oxfordshire and the Vale of White Horse, on the potential to accommodate unmet housing need. The responses are summarised at para 2.3.3 of that statement and none of them offered to meet any unmet needs.</p> <p>Reading Borough Council's Regulation 19 Local Plan position on housing numbers is different from that in the South and Vale Regulation 19 Joint Local Plan (JLP) and the Wokingham Regulation 19 Local Plan which propose a requirement equal to the old Standard Method calculation.</p> <p>Oxford City Council's Regulation 19 Local Plan, submitted in March 2024, proposed a higher housing requirement than the old Standard Method calculation. Oxford City Council received a letter from the Planning Inspectorate in September 2024 recommending withdrawing their Regulation 19 Local Plan. The letter followed examination hearings, attended by Oxfordshire County Council and others, which discussed concerns about their assessment of housing need and the resulting housing requirement and level of additional unmet need for which there was no agreement with other local authorities to address.</p> <p>This letter does not comment on whether Reading Borough Council's housing need assessment of 735 dpa and its proposed requirement of 825 dpa are soundly based, as it would require a level of interrogation into the evidence that we do not have the resource for. However, Oxfordshire County Council remains interested in the issue of housing numbers in accordance with the duty to cooperate. The fact this Regulation 19 Local Plan does not give rise to unmet need, means we do not need to consider proposals for addressing that unmet need and whether that results in additional infrastructure implications. We note that the proposed level of housing at 825 dpa contained within Reading does not give rise to new strategic infrastructure implications that we need to address.</p>	
Royal Borough of Windsor and Maidenhead	H1	We note that you do not propose to meet your full housing need figure, which you will seek to justify at examination stage. However, if the outcome of the examination is to increase your housing target beyond that stated in the Local Plan Pre-Submission Draft Partial Update, the Royal Borough would not be in a position to assist with meeting any unmet need as per our previous correspondence on this matter.	Noted. No change proposed.
Savills on behalf of John Lewis Partnership	H1	With reference to paragraph 35 of the NPPF 2023, Policy H1 as currently worded and evidence based does not meet the tests of soundness. Accordingly, in order to ensure the soundness of the Plan, it is important that the Council identifies a housing requirement that matches or exceeds the requirement provided by the standard method.	Do not agree. The Council considers that H1 does indeed meet the tests of soundness, and has sought to

			<p>demonstrate that this is the case in its evidence.</p> <p>It is worth noting however, that since April 2025 affordability information was published, the 2023 NPPF standard method is now slightly lower than the proposed H1 figure.</p>
Savills on behalf of Sorbon Estates Ltd	H1	<p>With reference to paragraph 35 of the NPPF 2023, Policy H1 as currently worded and evidence based does not meet the tests of soundness. Accordingly, in order to ensure the soundness of the Plan, it is important that the Council identifies a housing requirement that matches or exceeds the requirement provided by the standard method.</p>	<p>Do not agree. The Council considers that H1 does indeed meet the tests of soundness, and has sought to demonstrate that this is the case in its evidence.</p> <p>It is worth noting however, that since April 2025 affordability information was published, the 2023 NPPF standard method is now slightly lower than the proposed H1 figure.</p>
Savills on behalf of Viridis Real Estate	H1	<p>With reference to paragraph 35 of the NPPF 2023, Policy H1 as currently worded and evidence based does not meet the tests of soundness. Accordingly, in order to ensure the soundness of the Plan, it is important that the Council identifies a housing requirement that matches or exceeds the requirement provided by the standard method.</p>	<p>Do not agree. The Council considers that H1 does indeed meet the tests of soundness, and has sought to demonstrate that this is the case in its evidence.</p> <p>It is worth noting however, that since April 2025 affordability information was published, the 2023 NPPF standard method is now slightly lower than the proposed H1 figure.</p>
Stantec on behalf of St Edwards Homes Limited	H1	<p>We note that Policy H1 proposes the provision of 825 dwellings per annum. Whilst we welcome the increase in proposed housing provision compared to that proposed at Regulation 18 stage (800dpa), we question whether this figure is based on robust evidence and therefore sound. Paragraph 4.4.2 outlines that the current standard methodology calculates a need of 878 homes, stating that ‘the methodology includes a 35% uplift which makes a significant difference to the level of homes proposed, but which is not based on actual levels of local need’. Paragraph 4.4.3 goes on to establish that the 2024 Housing Needs Assessment identifies a housing need of 735dpa and there are</p>	<p>Noted. No change required.</p> <p>The housing figures are considered to be based on robust evidence which is available in the Housing Needs Assessment, Housing Provision Background Paper and HELAA.</p>

		<p>considered to be exceptional circumstances justifying using this assessment rather than the standard methodology. This is explained to be because 'Reading is in the unusual situation that the standard methodology (if the urban uplift is excluded) would result in a housing need that is too low, whilst the inclusion of the urban uplift results in a housing need that is too high' and Reading is the smallest of the authorities affected by the urban uplift 'which makes the application of an arbitrary urban uplift that applies only to the biggest cities inappropriate'. In paragraph 4.4.4 it is explained that in the context of national policy supporting significant boosting of housing delivery, housing delivery has been considered and the assessed capacity of 825dpa is proposed to be used as the annual requirement. We welcome the consideration of available capacity within the Borough and decision to pursue a greater level of housing delivery that the local assessment of need has identified as required.</p> <p>However, it is considered that there are opportunities for additional housing delivery, as we discuss further below, which would support an increased housing requirement in Policy H1. Moreover, it is considered that housing need is greater than the Local Plan and its evidence base suggests. Changes to the standard methodology introduced on 12th December 2024 result in a substantially greater housing need figure for Reading of 1,028dpa. In our view, the Local Plan should reflect the latest understanding of housing need and plan to meet that need in its entirety if it is to be positively prepared and sound. Planning for the identified housing need in full now is the only way to ensure that needs will be properly addressed and a significant boost to the supply of homes achieved, in line with the Government's objective as stated at paragraph 60 of the NPPF (December 2023).</p>	<p>The plan is submitted under transitional arrangements in the 2024 which would mean examination under the December 2023 NPPF, and as such the most recent version of the standard method will not apply. In any case, this will not result in any greater level of housing delivery in the Borough, as the capacity of Reading to deliver homes is assessed in detail in the HELAA and is the basis for the 825 figure.</p>
Turley on behalf of The Oracle Limited Partnership Group	H1	<p>The plan does not reflect the updated local housing need figure derived from the standard methodology, published within the NPPF in December 2024. Additional site allocations, or increased capacity of proposed allocations should be considered to ensure Readings housing land requirement is sufficient met over the plan period.</p>	<p>Do not agree. It is considered that the HELAA has considered each and every site within the Borough and determined capacity based on robust assumptions. Moreover, the Council seeks to pursue transitional arrangements in the latest NPPF, which state that as long as the plan has reached Regulation 19 by 12th March 2025 and meets at least 80% of housing need, it will be judged against the Dec 2023 NPPF.</p>
West Berkshire Council	H1	<p>WBDC acknowledges RBC's position with regards housing needs over the LPU period 2023 to 2041. WBDC also notes that Reading Borough Council's position is that its Partial Update to the Local Plan will meet its housing needs in full as identified through an</p>	<p>Noted. No change required.</p>

		<p>alternative approach to calculating housing need rather than the Local Housing Need (LHN) identified under the standard methodology. It welcomes the intention that under this approach the Regulation 19 version of the Partial Update plans for the provision of 825 dwellings per annum compared to the identified need of 735 dwellings per annum, and therefore it is not intended that there will be any unmet needs to be accommodated in neighbouring authorities. However, WBDC acknowledges that the approach proposed to be taken will come under scrutiny and under the current standard methodology the identified housing need for the Borough over the plan period 2023 – 2041 would be higher. In the event that the current standard methodology was to be used to identify housing need within Reading Borough, WBDC acknowledges there would be a shortfall in provision. As you are aware WBDC is currently at examination with its Local Plan Review (LPR). A Post Hearing Letter was published by the Inspector on 31 July 2024 (IN30) setting out some interim findings and further action points for WBDC. In his letter the Inspector identified that there could be a shortfall in housing provision over the plan period of around 850 dwellings. As such the Inspector requested WBDC consider how the LPR could be modified to boost the housing land supply in light of the possible shortfall identified. WBDC has identified additional provision, and this forms part of the consultation on the proposed Main Modifications which is running from 6 December 2024 until 31 January 2025. Given the current circumstances WBDC is not currently in a position to assist Reading with any unmet need that might arise within Reading Borough over the plan period to 2041. WBDC is committed to an early review of the Local Plan and can, if necessary, consider this request again as part of this work. We will continue to work closely with Reading Borough Council and other neighbouring authorities in considering strategic planning issues in the area.</p>	
Wokingham Borough Council	H1	<p>Subject to the outcome of the transport assessment, WBC supports in principle Policy H1 in setting a housing requirement which equates to an average of 825 dwellings per annum.</p> <p>It is noted that this exceeds the scale of housing need identified within the Reading Housing Needs Assessment July 2024 (735 dwellings per annum). It is further noted that whilst lower than the scale of housing need calculated by the national standard method under the NPPF 2023 (878 dwellings per annum), the proposed requirement exceeds the outcome before the additional step of the urban uplift is applied (650 dwellings per annum). Reading Borough Council have not defined any unmet housing need. Whilst RBC are promoting the Reading Housing Needs Assessment July 2024 as the appropriate assessment of housing need, it is likely that other parties will promote the use of the national standard method.</p> <p>For the avoidance of doubt, housing delivery in Wokingham Borough is highly dependent</p>	<p>Noted. No change required. It has now been confirmed that WBC is content with the outcome of the transport assessment.</p>

		on developing greenfield land. Exporting any proportion of housing need required by the urban uplift to Wokingham Borough would require further significant greenfield land to be utilised. This would be in clear conflict with the intended purpose of the urban uplift and national planning policy, and our view be inappropriate.	
Churchill Living	H2	<p>The wording of Policy H2 is commendable as its emphasis is on higher densities within the main urban areas, with the policy setting out minimum standards. For developers, such as Churchill Living, this is welcomed given flatted development on smaller brownfield sites often produces higher densities that many Councils are not willing to accept.</p> <p>Whilst we support the wording of Policy H2, we must recommend that further text is added regarding the need for older persons housing given the policy specifically discussed the number and type of bedrooms to be developed within the borough.</p> <p>We suggest adding the following regarding the need for older persons housing. This is following the demonstrable need for older persons housing in the borough, as set out in the Housing Needs Assessment (2024).</p> <p>“The provision of older persons housing, in accordance with the requirements of Policy H6, will be encouraged.”</p>	No change proposed. It is unclear what additional benefit this cross-reference would bring, as the needs of older persons are best addressed in Policy H6.
DP9 Ltd on behalf of SH Reading Master LLP	H2	We support the overarching approach of Policy H2, particularly the emphasis on achieving minimum density levels for residential developments, as this aligns with the objective of making efficient use of land. Station Hill, located within the central area, is well-suited to meeting and exceeding the minimum density requirement of 260 dwellings per hectare, given its urban character and exceptional accessibility by public transport, walking, and cycling. We acknowledge and appreciate that the policy explicitly sets these densities as minimums, ensuring flexibility to deliver higher densities where appropriate. The policy does not place an upper limit on density, which is crucial to ensure that highly accessible brownfield land, such as Station Hill, can be optimised for housing in a design-led approach to density and housing delivery.	Noted. No change required.
Historic England	H2	<p>We note the Council is proposing a significant increase in density – especially in the town centre. While we do not dispute the merits of intensifying development in the most sustainable locations, we do have a concern about the degree to which these minima figures take account of impacts on the historic environment. Mitigating these concerns, we welcome the proposed exception clause, and thus we do not object:</p> <p>“Exceptions to the minimum densities will apply where achieving that density would:</p> <ul style="list-style-type: none"> • Cause unacceptable harm to a designated heritage asset or its setting;” 	Noted. No change required.
Lichfields on behalf of Tilehurst	H2	Our client supports the aim of the LPPU19 to provide more family housing in Reading and concurs that there is “a particular onus on those sites outside the town centre to help to meet the needs for family homes” (LPPU19, para. 4.4.12).	Do not agree. The amendments to these sites have been made to reflect

People's Local Charity		<p>However, this aim of the LPPU19 is not supported by the proposed strategy within the draft Plan. In particular, the LPPU19's proposed changes to Policy WR3s (Land at KentwoodHill) and WR3t (Land at Armour Hill) would undermine RBC's ability to provide family housing within the borough. This is inconsistent with the aim of the LPPU19 including policy H2 and the NPPF's (December 2023) requirement "to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community" (para. 60) and to ensure that "a sufficient number and range of homes can be provided to meet the needs of present and future generations" (para. 11b). The LPPU19 is not consistent with national policy and therefore not considered sound.</p>	<p>the findings of the prospective developer's own ecological work, and as a result it is unlikely that a higher number of dwellings could be delivered in practice – but this is an indicative range only and would need to be established at planning application stage.</p>
Lichfields on behalf of USS Investment Management Limited	H2	<p>Based on the analysis above, our client considers that the LPPU19 is unsound for the following key reasons:</p> <ul style="list-style-type: none"> • RBC's calculation of the existing average residential density is a significant underestimate. RBC's assessment of the existing average residential density neglects prominent existing high density town centre developments. There is also no justification for the LPPU's failure to pursue a significant uplift in average residential density, as required by NPPF (December 2023) para. 129a. The LPPU19 is therefore not consistent with national policy and thus not considered sound. • RBC fails to fully consider the potential of exceptionally accessible brownfield sites, such as our client's sites at Aquis House (Policy CR14t) and 33 Blagrove Street (Policy CR14u) which are located directly opposite Reading Station, to accommodate higher density development to meet the development need of the borough. This is inconsistent with NPPF (December 2023) para. 8c which requires "making effective use of land", para. 123 which requires strategic policies to make "as much use as possible of previously-developed or 'brownfield' land" and para. 109 which states that "significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes". The LPPU19 is therefore inconsistent with national policy and thus not considered sound. RBC's proposed approach is also inconsistent with the LPPU19's objective to "Make the most efficient use of Reading's limited land, particularly previously developed land, to ensure that as many new homes as possible are delivered to meet identified needs, particularly needs for 	<p>Do not agree.</p> <p>No evidence is presented as to why the RBC assessment of existing average density is an underestimate, and no alternative figures for existing residential density is provided. The full workings of the existing density analysis can be provided if necessary.</p> <p>As such, it is not agreed that 260 dwellings per hectare does not represent a significant uplift over existing residential density. The requirement is not that an uplift over recently achieved average densities should be applied as a minimum, particularly since Reading has been making efforts to develop at high density wherever appropriate for some years in the town centre.</p> <p>The reasons why Aquis House and 33 Blagrove Street (the latter of which is within a conservation area) are proposed to be allocated with the respective dwelling ranges are set out in the HELAA, but as stated</p>

		<p>affordable housing” (LPPU19, para. 2.2.2). The LPPU19 does not propose an appropriate strategy, it is therefore not justified and thus not considered sound.</p> <p>The LPPU19 proposes a minimum residential density in the town centre (260 dph) which does not represent a significant uplift in average density as required by NPPF (December 2023) para 129a. This proposed minimum residential density also remains substantially lower than the average residential density achieved between 2013-2023 (334 dph).</p> <p>Policy H2 therefore needs to be amended to further increase the proposed minimum density for town centre residential development significantly above the currently proposed standard of 260 dph in order to make effective of use land as required by the NPPF (December 2023).</p> <p>The LPPU19 should seek to make an effective use of exceptionally accessible brownfield sites as such required by the NPPF (December 2023), such as our client’s site at Aquis House (Policy CR14t) and 33 Blagrove Street (Policy CR14u), by increasing the quantum of development allocated in the Plan to meet the growing need within the borough. Further commentary on these locations is set out in our comments on these policies.</p>	<p>elsewhere, this is an indicative dwelling range for monitoring purposes, and if an ability to develop for a higher number of dwellings can be satisfactorily demonstrated at planning application stage, the dwelling ranges in the policy will not be an impediment.</p>
Ms Funmi Alder	H2	<p>I think more houses should be built rather than flats. Families prefer to live in houses that have their own private gardens. They also contribute to wellbeing. There has been much research over the decades to show that this is preferable.</p>	<p>Noted. No change required. Both flats and houses play an important role in meeting the needs of different groups. The proposed changes seek to increase the amount of family housing sought on sites outside the town centre.</p>
Ms Sarah Jones	H2	<p>The number of homes being requested to be built each year is far too high. The infrastructure, services, NHS and land available cannot support this high density living. There is evidence to support that high density developments increase pollution, overcrowding, strain on public infrastructure and traffic congestion. Without an increase in green outdoor space it can also lower the quality of life of existing and new residents putting further pressure on limited council & NHS resources.</p>	<p>Do not agree. The number of homes proposed has been informed by a local need assessment and an assessment of capacity within the Borough. There is a pressing need for housing within Reading. Other policies within the Plan, notably CC9, aim to require developers to deliver or help to fund the necessary infrastructure to support new housing. High density</p>

			developments do not increase pollution or traffic congestion, particularly because the highest density areas will be located in areas that are accessible to public transport and walkable, thereby reducing private car use. Developments are also required to comply with EN9: Provision of Open Space.
Savills on behalf of John Lewis Partnership	H2	<p>With reference to paragraph 35 of the NPPF 2023, Policy H2 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy H2 in order to ensure the soundness of the Plan.</p> <p>“1. Density Residential development will be expected to achieve at least the following minimum densities:</p> <ul style="list-style-type: none"> • Town centre sites: 260 dwellings per hectare • Urban sites: 100 dwellings per hectare • Suburban sites: 42 dwellings per hectare. <p>Exceptions to the minimum densities will apply where achieving that density would:</p> <ul style="list-style-type: none"> • Cause unacceptable harm to a designated heritage asset or its setting; • Cause a detrimental effect on important landscapes; • Create unacceptable impacts on amenity of existing or new residents; Prevent an appropriate conversion of an existing building or buildings; • Prevent policy requirements on the minimum proportion of family homes of three or more bedrooms from being achieved; or • Prevent policy requirements on the provision of open space or other necessary on-site facilities from being achieved. <p>Subject to the above, t The appropriate density of residential development will be informed by:</p> <ul style="list-style-type: none"> • the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas; • its current and future level of accessibility by walking, cycling and public transport; • the need to achieve high quality design; • the need to maximise the efficiency of land use; and • the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers. 	Do not agree. The NPPF allows for the considerations listed, including heritage, landscape, amenity, etc and the policy is right to increase the number of family homes sought as there is pressing need for family homes within the Borough.

		<p>The circumstances of the site may allow for a density that significantly exceeds the minimum specified.</p> <p>2. Mix of sizes Wherever possible, residential development should contribute towards meeting the needs for the a mix of housing based on an up-to-date assessment of local needs and site-specific circumstances set out in figure 4.5, and in particular should maximise the provision of family homes of three or more bedrooms...</p>	
Savills on behalf of Sorbon Estates Ltd	H2	<p>The specific requirement for major development outside the central area and district / local centres to provide at least 67% 3-bedroom homes appears to be at odds with the overall identified need for 44.9% 3-bed homes across the borough. Whilst it is acknowledged that different areas of the borough are identified to deliver different proportions of 3-bedroom homes to meet overall needs; it is not clear how the proposed breakdown between the central area, district / local centres and other areas has been derived. The breakdown of different proportions for these areas also fails to acknowledge highly accessible urban sites on the edge of the central area, such as Reading Link Retail Park, which are more akin to town centre sites but fall within the broad definition of 'other locations' identified to deliver a significant proportion of 3-bed homes.</p> <p>The LPPU should also recognise all forms of housing provision which can contribute to 'family' needs, including for instance the contribution of larger 2-bed units which can provide for families of up to 4 people and be of a similar size to 3-bed units, contributing to the borough's housing needs in a way the policy does not fully recognise. Indeed it is notable that the minimum gross internal floor areas for 2-bed 4-person dwellings (70sqm) and for 3-bed 4-person dwellings (74sqm) are very similar based on nationally described space standards (NDSS).</p> <p>Accordingly it is recommended that reference to specific mix requirements is deleted from Policy H2.</p>	<p>Do not agree. No changes proposed.</p> <p>As evidenced in the 2023 Local Plan Review, Reading falls a long way short of delivering the required amount of family housing in large part because of the high reliance on high density town centre development. Whilst more family housing will also be sought in these locations, this places a much greater reliance on sites outside the centre to contribute to meeting these needs.</p> <p>The contribution of larger 2-bed units is recognised, and will be important given that delivering the overall level of need for 3-bed homes will continue to be challenging, but given that the standards are relatively similar it should not be too onerous to provide the required 3-bed units in place of larger 2-bed units.</p>
Savills on behalf of Viridis Real Estate	H2	<p>With reference to paragraph 35 of the NPPF 2023, Policy H2 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy H2 in order to ensure the soundness of the Plan.</p> <p>"1. Density Residential development will be expected to achieve at least the following minimum densities:</p>	<p>Do not agree. The NPPF allows for the considerations listed, including heritage, landscape, amenity, etc and the policy is right to increase the number of family homes sought as</p>

		<ul style="list-style-type: none"> • Town centre sites: 260 dwellings per hectare • Urban sites: 100 dwellings per hectare • Suburban sites: 42 dwellings per hectare. <p>Exceptions to the minimum densities will apply where achieving that density would:</p> <ul style="list-style-type: none"> • Cause unacceptable harm to a designated heritage asset or its setting; • Cause a detrimental effect on important landscapes; • Create unacceptable impacts on amenity of existing or new residents; • Prevent an appropriate conversion of an existing building or buildings; • Prevent policy requirements on the minimum proportion of family homes of three or more bedrooms from being achieved; or • Prevent policy requirements on the provision of open space or other necessary on-site facilities from being achieved. <p>Subject to the above, the appropriate density of residential development will be informed by:</p> <ul style="list-style-type: none"> • the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas; • its current and future level of accessibility by walking, cycling and public transport; • the need to achieve high quality design; • the need to maximise the efficiency of land use; and • the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers. <p>The circumstances of the site may allow for a density that significantly exceeds the minimum specified.</p> <p>2. Mix of sizes Wherever possible, residential development should contribute towards meeting the needs for the a mix of housing based on an up-to-date assessment of local needs and site-specific circumstances set out in figure 4.5, and in particular should maximise the provision of family homes of three or more bedrooms...</p>	there is pressing need for family homes within the Borough.
University of Reading	H2	<p>The University does not object to the proposed amendment to this policy, however, would emphasise that the 'wherever viable and achievable' wording is retained to ensure that this requirement is applied on a case-by-case basis.</p> <p>The proposed amendments to policy H2 are supported and the policy is considered to be sound.</p>	Noted. No change required.
Churchill Living	H3	<p>We strongly recommend that for this policy to be considered justified and accurate that the Viability Study is run for sheltered and extra-care housing using the assumptions recommended below and the affordable housing policy amended accordingly.</p>	No change proposed. The evidence to support the plan needs to be

		<p>Sales and marketing costs As detailed within the RHG Briefing Note sales and marketing costs for older persons housing schemes are typically 6% of GDV and this should be used within the older persons modelling rather than the 2.75% used.'</p> <p>Sales periods As discussed in the RHG Briefing Note, sales periods of older persons' housing schemes are typically longer for retirement and extra care housing than general needs housing. There is a typical 18 month build period before sales can commence. Sheltered and Extra care schemes cannot be phased but must be fully operational and completed from month 1 of sales / occupation. As detailed within the RHG Briefing Note, once sales commence a rough guide is that 40% of units will be sold at the end of the first year of sales, 30% during the second year of sales and 30% during the third period. This should be considered within the viability modelling and amended accordingly. These longer sales periods should therefore be incorporated into the Viability Assessment, especially for sheltered housing, rather than the 2 sales per month indicated which would for example show that the 30 unit scheme modelled would sell out in just 15 months. A 40 month sales period for an extra care scheme seems more appropriate.</p> <p>Empty property costs It is recommended that a standard allowance of £5,000 per unit is assumed as a typical average empty property cost - to cover Council Tax liability on unsold units and service charges (which will be applicable to the whole building from day first resident moves in). This increases to £10,000 for extra care accommodation to reflect higher costs particularly in maintaining care, communal and catering facilities, staff, and services and reflecting a slower sales rate than Retirement Living. We note that no allowance for empty property costs appears to have been made in the report.</p> <p>Developer Return PPG sets out that 'For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers. However, for specialist housing for older people there is a clear precedent for a return of not less than 20% of gross development value primarily because of the risks associated with such developments. This is consistent with the Inspector's conclusions for appeals such as McCarthy Stone proposal at Redditch (Appeal Ref: 3166677), Churchill Retirement Living proposal at Cheam (Appeal Ref: 3159137) and the Churchill Retirement Living scheme at West Bridgford (Appeal Ref: 3229412) in 2019. 20% profit should therefore be assumed for specialist housing for older people rather than the 17.5% base position used within the</p>	<p>proportionate, and therefore the Viability Study has focused on general needs housing which forms the vast majority of the identified need and allocations within the plan. The Council recognises that there will be developments that will have particular viability circumstances, and these will need to be demonstrated at planning application stage through a submitted viability assessment if the level of affordable housing is to be reduced below policy compliant levels, as recognised in clause 2 of the policy.</p> <p>In terms of the review mechanisms, it is considered appropriate to seek to secure a contribution towards much needed affordable housing in the area should viability conditions improve. As referenced in policy H6, a particularly large proportion of the older persons housing needs are for affordable housing, and to try to meet these needs the Council must utilise the tools available to it.</p>
--	--	--	--

		<p>Report. Given the significant change needed to the Viability Study, we would like to be kept informed as to when the hearings will be held so we can attend.</p> <p>Review Mechanisms:</p> <p>As previously identified, Policy H3 is seeking to require a review mechanism as part of the S106 Agreement. We consider this to burden development which has already been found to not be viable, this is considered to be wholly inappropriate and inflexible. Housing for older people, being specialist in nature as defined by Paragraph: 010 Reference ID: 63-010-20190626 of the PPG on Housing for Older and Disabled people, is often delivered on small brownfield sites separate to housing allocations or other development sites of around 0.5 hectares. Schemes tend to be high-density flatted developments located near town centres that have around 35 to 40 units. They tend to be delivered as a single phase. Sheltered housing and extra care development differ from mainstream housing and there are a number of key variables that affect viability. These include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods. Once planning permission for specialist housing for older people is granted given the small size and single phase of schemes the objective is to commence the build and complete all units within one single phase. The build period usually takes around 18 months. Older person's housing, given its specialist nature and being built in one phase, then has a much longer sales period often up to 36 Months with 50% of the scheme often not being sold until year 2 of sales, despite being completed some years earlier. Given the completion of the whole scheme on the first flat occupation, empty property costs are then charged on properties that have not yet sold, this includes costs such as council tax and service charges.</p> <p>For a large or multi-phase development which will be delivered over a long period it makes sense to check whether the scheme's viability has changed with market movements. However, for a small single phased site the Inspectorate have repeatedly noted that review mechanisms are unnecessary. For example, under Appeal decision reference APP/C4235/W/120/3256972 dated 14 April 2021, the Inspector noted in paragraph 17 that <i>'as the development would almost certainly be completed in a single phase with an estimated build time of 12-18 months, it is not the sort of large multi-phased scheme where stronger arguments for a review/clawback mechanism may otherwise exist'</i>.</p> <p>RECOMMENDATIONS</p> <p>The following text should be added to point 3 of Policy H3: <i>"In the event that a policy-compliant affordable housing contribution cannot be secured at application stage, a deferred contribution mechanism will be included in a Section 106 agreement that, based on the conclusion of a later viability review, secures an appropriate proportion of any</i></p>	
--	--	--	--

		<i>increased profits over and above those identified at application stage as a financial contribution towards affordable housing This requirement will only be applicable to developments of 100+ units and therefore does not apply to smaller single phased schemes."</i>	
Home Builders Federation	H3	<p>The policy is being amended to include a new clause 3 which requires a viability review of schemes where policy compliance with H3 is not possible. HBF recognise that such policies are consistent with national policy but consider it inappropriate for this to be applied to all development that makes a contribution. The principal, as reconsider the Councils SPD is most applicable to phased development where there can be considerable change over time.</p> <p>As such HBF would suggest that this only be applied to phased development in order to avoid unnecessary viability assessments for development to come forward soon after securing planning permission.</p>	Do not agree. Developments which are recognised as phased through the permission are not common in Reading, and applying this clause to phased developments only will result in significant levels of development delivering less than policy-compliant levels of affordable housing without any mechanism to allow an increase in contribution if viability circumstances improve.
Savills on behalf of John Lewis Partnership	H3	<p>With reference to paragraph 35 of the NPPF 2023, Policy H3 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy H3 in order to ensure the soundness of the Plan.</p> <p>"...In determining residential applications the site size, suitability, <u>and</u> type and tenure of units to be delivered in relation to the current evidence of identified needs will be assessed. The following tenure mix will be sought:</p> <ul style="list-style-type: none"> • At least 62% of the affordable housing to be provided as Reading Affordable Rent; • A maximum of 38% of the affordable housing to be provided as affordable home ownership products, which may include First Homes and shared ownership...." 	Do not agree. The NPPF allows for the considerations listed, including heritage, landscape, amenity, etc and the policy is right to increase the number of family homes sought as there is pressing need for family homes within the Borough.
Savills on behalf of Sorbon Estates Ltd	H3	<p>The tenure requirements set out at part 4 of draft Policy H3 are based on details set out within the Affordable Housing SPD (2021). However, given that affordable housing needs are likely to change across the borough over the course of the Plan period, it will be important that affordable housing is provided to meet local needs at the time of development coming forward and taking into account site-specific circumstances. Accordingly, it is recommended that a specific tenure mix is deleted from Policy H3.</p> <p>Furthermore, as part 4 of the Policy is currently drafted, the LPPU proposes to retain 62% of the affordable housing mix as 'Reading Affordable Rent' (rental levels capped at 70% of market values) and the remaining 38% of 'other affordable ownership' (i.e. shared ownership) incorporating 25% to be secured as 'First Homes'. However by providing First Homes within the 38% 'other affordable ownership', the level of potential shared ownership is effectively reduced to 13% of the overall tenure mix. This is contrary to the approach set out in the PPG, which prioritises the provision of 25% First Homes, and then</p>	<p>Do not agree. It is considered that recognition of the required tenure mix in the policy itself as opposed to just the SPD is important to provide clarity on what will be sought and give sufficient policy weight.</p> <p>It is recognised that the proposed approach does not exactly reflect the PPG regarding First Homes. However, First Homes is not a product that meets Reading's most pressing affordable housing needs, nor is it one</p>

		states that the remaining proportion of affordable provision should be split by a tenure mix identified in the Plan.	that developers in Reading have regularly sought to provide, and the Council does not consider that it should therefore reduce the amount of Reading Affordable Rent that is sought, particularly since the 25% First Homes requirements are no longer part of national policy. The policy allows for the provision of up to 38% shared ownership as currently worded and would not require any First Homes.
Savills on behalf of Viridis Real Estate	H3	<p>With reference to paragraph 35 of the NPPF 2023, Policy H3 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy H3 in order to ensure the soundness of the Plan.</p> <p>“...In determining residential applications the site size, suitability, and type and tenure of units to be delivered in relation to the current evidence of identified needs will be assessed. The following tenure mix will be sought:</p> <ul style="list-style-type: none"> • At least 62% of the affordable housing to be provided as Reading Affordable Rent; • A maximum of 38% of the affordable housing to be provided as affordable home ownership products, which may include First Homes and shared ownership.... 	Do not agree. The NPPF allows for the considerations listed, including heritage, landscape, amenity, etc and the policy is right to increase the number of family homes sought as there is pressing need for family homes within the Borough.
University of Reading	H3	The proposed amendments to policy H3 are supported and the policy is considered to be sound.	Noted. No change required.
Savills on behalf of John Lewis Partnership	H4	The proposed requirement for a further three-year tenancy to be offered is acknowledged and supported.	Noted. No change required.
Stantec on behalf of Aviva Life & Pensions UK Ltd	H4	<p>The general thrust of Policy H4 is supported. However, the suggested additional wording that has been added to criterion 2 is not supported. The requirement to offer a further three-year tenancy period at the end of the first 3-year tenancy period is unduly onerous and goes way beyond established industry practice.</p> <p>As a consequence, and in the absence of detailed justification, the policy as currently worded is not sound. The additional text added to criterion 2 should be deleted.</p>	Do not agree. No change proposed. The proposed change aims to increase security for tenants and is not considered to be unduly onerous.

Watkin Jones Group	H4	<p>Part 1 of draft Policy H4 states that BTR is “secured in single ownership providing solely for the rental market for a minimum 20-year term with provision for clawback of affordable housing contributions should the covenant not be met”. Whilst WJG supports the principle of the proposed approach, it can find no explanation as to why the covenant period is 20 years. The Council recognises that BTR is institutionally funded. Those funds rely on established investment assumptions. One of these is that BTR is covenanted to remain as a rental product for a period of 15 years. This is an approach established more widely across the UK, for example within Policy H11 of the London Plan. WJG is not aware of any policy which has a covenant period of greater than 15 years. Whilst it may appear to be a minor point, a longer covenant period of 20 years will deter investment in BTR. To ensure that the policy is effective in delivering BTR and supports the borough in being attractive to BTR investors, WJG suggests that the covenant period is reduced to 15 years.</p>	<p>Do not agree. The 20 year period has been part of H4 since it was introduced in the adopted Local Plan and is not proposed to be changed. It has not appeared to deter BTR investment in Reading in that period. A BTR proposal benefits from matters such as a different approach to affordable housing tenure, and in return it provides a high degree of on-site facilities of management, so 20 years maintains this balance for a longer period.</p>
Akira Yamanaka Architects	H5	<p>Policy H5 4.4.44 -i 'Minimum floor to ceiling height is 2.3m' We consider this too low. The recommended minimum height in London is 2.5m. There is no reason Reading should adopt a lower standard than London.</p>	<p>No change. This reflects the Nationally Described Space Standard.</p>
Churchill Living	H5	<p><i>"The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan"</i> (Paragraph: 002 Reference ID: 10-002-20190509)</p> <p>Therefore, as the requirements stipulated within the wording of Policy HS have not been tested appropriately within the Viability Report (2024), we must consider the Local Plan to be unsound on the grounds the renewable energy targets are not justified, positively prepared or effective.</p> <p>RECOMMENDATIONS: We must request that the older persons housing typology is accurately tested and considered within a revised Viability Study</p> <p>Wheelchair Accessible Standards Policy HS also sets out space standards at point F), with the requirement that all developments of 20 or more new dwellings to provide 10% of all dwellings to meet M4(3) wheelchair adaptable. M4(3) standards place large additional costs on retirement housing over general market housing as the extra communal areas, fixtures and fittings, services</p>	<p>Please see comments in response to Churchill Living relating to policy H3.</p> <p>As stated, the Viability Study makes an allowance for compliance with policy H5. The evidence needs to be proportionate, and this was considered the best approach as set out in the Study. However, policy H5 does clearly allow for consideration of viability when complying with this policy, and this will be taken into account at planning application stage.</p>

		<p>and controls and increased room dimensions and layout, include up to 30% more floorspace with corresponding reduction in density, sales values, and affordability of such housing. While some value may be secured for larger units this is unlikely to mitigate the overall loss of units across the proposal as a result of the requirement. It is rare in our experience that requirements set out in Adaptable & Accessible policies are accurately assessed within plan wide viability studies and it is inappropriate for any such policy to be brought forward without first accurately assessing actual costs including costs of larger buildings overall. In the Viability Study it is recognised that a generic 15% additional costs allowance has been adopted to cover the requirements of Policy HS. However, this is coupled with the knowledge that the older persons housing typology has not been accurately tested and therefore, we consider the requirement for 10% M4(3) wheelchair adaptable to be unviable. Furthermore, the Viability Study only tests a 5% requirement, whereas the Local Plan is now seeking to require 10%, doubling what has been tested at plan stage.</p> <p>RECOMMENDATIONS</p> <p>Given the position that the requirement for 10% of dwellings to be M4(3) Wheelchair Adaptable has not been accurately tested within the Viability Study, we must request that this is undertaken. We consider that once these additional costs have been incorporated into the viability assessment, along with an accurate test to the older persons housing typology, this will inevitably render older persons housing to be unviable.</p>	
DP9 Ltd on behalf of SH Reading Master LLP	H5	We acknowledge and support the intent of Policy H5 to ensure high standards for new housing across Reading Borough, particularly in relation to sustainability, energy performance, and accessibility.	Noted. No change required.
Environment Agency	H5	We have reviewed policy H5 Standards for Housing and are satisfied regarding paragraph 4.4.45 (mislabelled as 4.4.44) of policy H5.	Noted. No change required.
Friends of the Earth	H5	<p>We would like to see the average space heating demand requirement reduced – in accordance with ‘fabric first’ principle. PassivHaus standard is 15 kWh/m² so this should be the standard.</p> <p>There is a widely recognised “performance gap” between design and delivery of buildings. The PassivHaus design and testing approach has been shown to reliably deliver measured in use outcomes that match those predicted by the design. Developers should either use the Passivhaus methodology or explain how the method that they propose to use will reliably deliver in use energy demands that their design predicts.</p>	<p>No change proposed. The proposed level is based on LETI figures and widely used among other Local Planning Authorities. It is considered that reducing the figure further would affect viability.</p> <p>No change proposed. By employing energy use and total heating demand</p>

		<p>We would like to see incentives to reduce electricity consumption by the use of ground- or air-sourced heat pumps and mechanical ventilation with heat recovery. As well as reducing running costs these techniques will help to reduce demand on the local and national electricity supply to reduce the risks of blackouts on cold, still winter evenings. It is important that infrastructure is in place to meet peak demand when renewable generation is low. Must not allow developments where future running demand for energy dependent on carbon emissions will continue for decades, or where demand for electricity will be exceptionally high.</p> <p>The 'either/or' approach seems to supply a lot of options – if developments require 'exceptional basis' consideration they should all be required to produce an energy statement.</p> <p>How the financial contribution to the LPA will be calculated given future uncertainties on carbon pricing and electricity pricing should be explained in more detail. Energy demand will continue for the life of the building and £15k per dwelling may be too low.</p>	<p>metrics, the proposed policy seeks to address the performance gap. Specifying that all development be Passivhaus unfairly privileges one certification system and does not provide sufficient flexibility.</p> <p>Agree, but no change required. Reduced energy consumptions is required by the policy and heat pumps are referenced within the plan. It is not considered helpful to specify technologies in great detail, as more general language helps to future-proof the plan and provide flexibility for developers.</p> <p>Agree, but no change required.. Energy Statements are already required in order to assess whether or not the requirements have been met.</p> <p>Do not agree. This reflects the approach used by other Local Authorities and aims to avoid impacts on viability and deliverability of schemes. The pricing minimum and maximum is a range to allow for the contribution to be determined on a case-by-case basis.</p>
Home Builders Federation	H5	<p>Clause b would require all new build residential development to achieve water neutrality where possible. This should be deleted. HBF would agree that the lower optional technical standard of 110 l/p/d is justified on the basis that Reading is in an area of water stress, but it is not sound to require development to show that is not possible to go below what is the minimum applicable standard.</p> <p>The approach proposed by the Councils based on energy use is inconsistent with the approach set out in the WMS and as such is unsound. It should be noted that the Government have considered whether it was appropriate to use a delivered energy metric</p>	<p>Do not agree. No change proposed. It is considered that aiming for water neutrality is an important approach for addressing demand and this policy has been drafted based on input from Thames Water. In any case, "where possible" will prevent impacts on viability.</p>

		<p>such as the one being proposed in the policy position paper and have concluded that these do not offer any additional benefits to those being taken forward by Government. Therefore, if the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate and not as an energy use target in order to avoid fragmentation of the standards with different requirements being set in different areas which it must be recognised was not only an expectation of the WMS but also of the legislation that permits council to adopt higher standards in local plan in the first place. As such the HBF do not consider the council to be justified in departing from either the WMS or the Planning and Energy Act (2008) and the section of the policy under the heading “All New Residential Development” and paragraph 4.27 and 4.28 should be deleted.</p> <p>While HBF do not consider the policy to be consistent with national policy we are also concerned that the Councils has not considered the impact on viability, or the deliverability of development given that no viability assessment has been included in the evidence base. Without this evidence it is not possible for the council to introduce these as it has no understanding of the impact on development in Reading. The Council will need to ensure the costs and deliverability of this policy are fully and robustly tested. In preparing its viability assessment HBF suggest the Council consider costs published by the Future Homes Hub (FHH) as part of their work to support and inform the implementation of the Future Homes Standard. The costs for similar standards to those being proposed can be found in the FHH report ‘Ready for Zero’. This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Councils.</p> <p>HBF also note that where net zero cannot be achieved for technical reasons the council will require applicants to provide offsite renewable energy, provide a payment of between £5,000 and £15,000 per dwelling to the council demonstrate a building will be connect to a heat network or demonstrate compliance with Passivhaus plus. With regard to the payment, it is not clear from the local plan or evidence base how the council will use this offset any carbon emissions and how this is directly and fairly related to the scale of the development. Without the necessary evidence it should be deleted.</p>	<p>Do not agree. The WMS does not preclude Local Authorities from setting their own energy standards. By employing energy use and total heating demand metrics, the proposed policy seeks to address a widely-acknowledged ‘as-built’ performance gap. By relying on a percentage uplift of TER using SAP, the Council cannot adequately fulfil its duties under legislation to combat and mitigate climate change. This approach is based on LETI guidance and reflects the adopted policy approach of various local planning authorities including Central Lincolnshire and Cornwall.</p> <p>Do not agree. A full viability assessment has now been published which considers the costs associated.</p> <p>Do not agree. Each application will be assessed on a case-by-case basis to ensure that receipts are used to provide renewable energy.</p>
John Sharpe	H5	<p>The Allowable heating demand is too high – site average of 15-20 kWh/m² while PassivHaus is 15 kWh/m².</p> <p>The LETI Climate Emergency Retrofit Guide suggests that the average space heating demand (kWh/m²/yr) for 2021 allowing for the performance gap is 85. The space heating</p>	<p>Do not agree. This approach is based on LETI guidance and reflects the adopted policy position of other local planning authorities such as Cornwall and Central Lincolnshire. A range is</p>

		<p>demand in order to fit the “realistic” criteria should allow for the widely recognised “performance” gap between design and delivery of buildings.</p> <p>The PassivHaus design and testing approach has been shown to reliably deliver measured in use outcomes that match those predicted by the design. Developers should either use the Passivhaus methodology or explain how the methodology that they propose to use will reliably deliver in use energy demands that their design predicts.</p>	<p>included to provide some limited flexibility.</p> <p>It is unclear what is meant by this comment.</p> <p>Do not agree. No change proposed. The policy intentionally avoids prescription of one certification method in order to allow for flexibility.</p>
Mark Drukker	H5	Little emphasis of the need for gardens. Every house should have front and back gardens.	No change required. This matter is addressed in H10.
Stantec on behalf of Aviva Life & Pensions UK Ltd	H5	As per our comments in relation to the earlier CC policies, the suggested amendments to Policy H5 are not supported. Its requirements will place significant additional burden on the viability of all development schemes and have the consequence of stifling development. The general approach and detailed wording of the policy is inconsistent with the governments stated aims and objectives, overlaps with other policies within the Plan, and has not been appropriately justified. As a result, the policy as currently worded is not sound and should revert to how it was previously drafted.	Do not agree. This approach reflects the adopted policy position of various other local planning authorities and is supported by a growing evidence base. The exceptional basis clause is intended to ensure that no significant additional burden will result.
Stantec on behalf of St Edwards Homes Limited	H5	Within this context, St Edward welcome and support the Council's efforts to promote high levels of sustainability. However, a statement given in the House of Commons (on 13th December 2023) has outlined that the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. Moreover, it has advised that any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale. It is unclear what evidence has been prepared to justify the proposed requirements within Policy H5. In this context, the soundness of the policy is questioned.	Do not agree. The WMS does not preclude Local Authorities from setting their own energy standards. By employing energy use and total heating demand metrics, the proposed policy seeks to address a widely-acknowledged 'as-built' performance gap. By relying on a percentage uplift of TER using SAP, the Council cannot adequately fulfil its duties under legislation to combat and mitigate climate change. This approach is based on LETI guidance and reflects the adopted policy approach of various local planning authorities including Central Lincolnshire and Cornwall.

University of Reading	H5	<p>Whilst clarification is required over the scope and definition of water consumption neutrality in order to support this proposed policy, the alternative approach to achieve the Building Regulations Part G optional target is with the specification of low flow fittings is supported.</p> <p>The balancing of total energy demand through provision of on-site renewable energy production may not be feasible or viable in all cases and therefore flexibility should be maintained with use of the “exceptional basis clause”. The inclusion of the exceptional basis clause is welcomed. The University supports the approach to operational energy efficiency.</p> <p>In line with comments on non-residential targets, further information should be provided on the exceptional basis mechanisms. Minimum and Maximum financial contributions per plot are indicated (minimum of £5k and maximum of £15k) however justification for the identification of the sums is not provided. In addition, the policy is proposing energy-based metrics however there are no established precedents for performance offsetting based on energy-based metrics. Therefore, clarification is required to understand if the offsetting is to be assessed against energy-based performance or another aspect of performance (carbon, for example) and if so what the related targets are. Any mechanism for offsetting should provide additional detail on the legal arrangement, the pricing mechanism, assessment methodologies and offsetting periods.</p> <p>The policy does not include the text previously proposed through the LPPU Scope and Content consultation relating to requirements for Embodied Carbon Assessments and the requirement of a particular score.</p>	<p>Noted. No change required.</p> <p>Noted. No change required.</p> <p>Do not agree. No change proposed. This approach reflects the approach employed by other local planning authorities, such as Central Lincolnshire. It is not considered necessary to provide significant clarification with regard to offsetting as this will be determined on a case-by-case basis. The range provided is simply intended to limit impacts to viability which generating financial contributions that would enable offsetting.</p> <p>Embodied carbon assessments are addressed by Policy CC2.</p>
Churchill Living	H6	<p>The delivery of a suitable level of specialist older persons' housing will be a substantial undertaking over the Local Plan period and unless action is urgently taken the Council will struggle to address this need. The inclusion of a dedicated policy which is supportive of the need to deliver specialist older persons' housing at suitable locations is commendable and supported accordingly.</p> <p>Furthermore, unlike many Councils, emerging Policy H6 does include specific figures on the need for older persons housing, as set out in the Housing Needs Assessment (2024), this again is commendable. However, Point IV specifically highlights the need for affordable older persons housing, which is demonstrated within the Housing Needs Assessment. Whilst we can appreciate there is a need for this type of housing, we also revert to our previous comments and recommendations that the older persons housing typology must be accurately and appropriately tested within the viability study. In the case of older persons housing typology being unviable, like the conclusions of many other</p>	<p>Noted.</p> <p>Please see response to Churchill Living comments on policy H3 regarding the Viability Study.</p> <p>In terms of clause vi, it is not clear what amendments are requested to this clause. It is considered appropriate that, given the high level of need identified, affordable housing for older people would count towards the affordable housing contribution.</p>

		<p>Council's up and down the country, we must request this element of the policy is amended. Affordable older persons housing tenures are typically brought forward and managed by registered providers who tend to prefer having control over management of the block so that service charges may be controlled rather than as part of a mixed management S106 block. We would encourage the council to create a policy basis which restrict the delivery of older persons housing in general. We would very much like to work with the council to enable this policy basis to come forward as part of this plan.</p>	
<p>NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board</p>	H6	<p>The ICB notes that Policy H6 indicates that developments will, where possible, locate accommodation close to, or incorporate, relevant community facilities, such as healthcare services. The ICB would like to reinstate our comments in the previous Regulation 18 consultation that developers should be required to provide robust evidence to identify appropriate mitigation measures to accommodate the demand for healthcare services, including NHS GP services. This is to ensure that any new specialist housing developments will not have a material impact on the local GP services. If potential developers are planning to deliver an onsite clinical space which will provide NHS primary care services, it is important for developers to have an early engagement with the ICB to discuss the provision. This is particularly important as the ICB has the delegated responsibility to ensure any new GP provision is financially and operationally viable. Therefore, this requirement should be included in the Policy. This applies to both developments for specialist accommodation for vulnerable people and development catering for people with limited mobility. Therefore, the ICB suggests the bullet point related to healthcare services in the proposed paragraph (ii) should be provided in a standalone paragraph which covers the entire Policy H6.</p> <p>The ICB has the following suggestion on the wording of Policy H6 to strengthen the requirements for developers to provide robust evidence to demonstrate appropriate primary care mitigation(s) are agreed and provided for any new residents:</p> <p><i>H6: ACCOMMODATION FOR VULNERABLE PEOPLE (Strategic policy)</i></p> <p><i>(i) Provision will be made for at least an additional 915 specialist older person housing units between 2023 and 2041, comprising 188 units of housing with care, 477 units of housing with support and up to 250 residential care bedspaces. This forms part of the overall need identified in policy H1. Other specialist accommodation for vulnerable people will address the identified needs, which are primarily for accommodation that enables occupants to live as independently as possible, particularly for older people and people with physical disabilities, accommodation for people of all ages with complex needs, or for accommodation that replaces existing aging properties.</i></p>	<p>Do not agree. It is unclear what additional benefit these changes would bring. It is considered that impacts on healthcare are best dealt with for all types of development within a single policy rather than being referred to individually for every type of development.</p>

		<p>(ii) Where development would provide an onsite healthcare provision which will deliver NHS primary care services, developers are required to engage with NHS Buckinghamshire, Oxfordshire, and Berkshire Integrated Care Board (BOB-ICB) or such appropriate body at an early stage if developments comprise any onsite clinical provision which will deliver NHS primary care services. Subject to the agreement with BOB-ICB, the provision and associated infrastructure must be operationally and financially viable. Developers are expected to carry out any required pre-project work at their own expenses to justify the provision and identify the required size of the provision. Developers are expected to construct and deliver the built facility and its associated infrastructure including but not limited to parking and landscaping to the BOB-ICB. Any healthcare mitigations must refer to Policy OU1A of this document.</p> <p>(iii) Where development would not provide any onsite healthcare provision but would result in an implication to local primary care services, developers will be required to provide robust evidence including the submission of a health impact assessment (HIA) or other relevant documents to demonstrate that the developments would not have any implications to local primary care services. Developers are expected to engage with BOB-ICB or such appropriate body at an early stage to discuss any offsite primary care mitigations if required. Developers are expected to carry out any required pre-project work at their own expenses to identify the primary care estates project(s) in accordance with the preproject works. A contribution should be made to provision of offsite primary care mitigations in the form of an offsite financial contribution.</p> <p>(iv) Development for specialist accommodation for vulnerable people will fulfil the following criteria:</p> <p>• Developments will, where possible, locate accommodation close to, or incorporate, relevant community facilities, such as healthcare services, or day care for elderly people.</p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	
University of Reading	H12	<p>Policy H12 is unchanged from the existing policy set out in the adopted Reading Borough Local Plan. However, there are some changes proposed to the supporting text. This includes paragraphs 4.4.104 to 4.4.107 (previously 4.4.97 to 4.4.102). Comments are provided on some of the text relating to The University of Reading.</p> <p>At paragraph 4.4.104 the text refers to the 2024 Housing Needs Assessment (HNA) and its conclusions on the need for additional purpose-built student accommodation. The University supports the acknowledgement that the need for student accommodation is dependent on the growth plans of the University. However, the supporting text should be</p>	<p>Do not agree. Although the Local Plan period is longer than the 10 year Estate Strategy, any necessary changes would be assessed in the five-yearly review of the Local Plan.</p> <p>Although alterations sought to the supporting text about the shortfall in</p>

		<p>amended to further acknowledge that there are likely to be changing circumstances and priorities for the University which may lead to the need for additional new built development in the medium to longer term, and the Local Plan time horizon is longer than its 10 year Estate Strategy, which it likely to be reviewed prior to the end of the Local Plan period.</p> <p>The information within paragraph 4.4.104 regarding the shortfall in bed spaces for first year students is taken from The University's response to the draft Reading Borough Local Plan (adopted in 2019), which is quoted in the HNA. This is therefore out of date and should be updated. The figure relating to the number of students across all years of study in rented accommodation other than university or private halls in 2021/22 is taken from figures from Higher Education Statistics Agency (HESA) data. Policy H12 is considered to be sound, however minor amendments are sought to the supporting text as set out above.</p>	<p>meeting student housing need are relatively minor on the face of it, and the Council would be content with its deletion, these were the subject of considerable debate at the Local Plan examination and it is considered that changes to these references would constitute a main modification.</p>
Watkin Jones Group	H12	<p>Whilst WJG appreciates that the Council does not propose to amend Policy H12 through the partial update, WJG does not support Policy H12 as currently drafted. This is because it only allows new PBSA to be located within or adjacent to existing campuses, and no justification to support this approach is provided. Students require access to many facilities, not just to university campuses. This may include shops, services and public transport interchanges. This explains why PBSA is typically located within town and city centres, even when university campuses are located out of centre (as illustrated in Bath and Bristol). Sites within Central Reading may provide suitable locations for PBSA and may more efficiently and effectively house students than in lower density locations around the university campus. Policy H12 should be updated to reflect this. Many appeal decisions (e.g. 3211004, 3264641, 3264642, 3303205) also recognise that the provision of additional PBSA frees up HMOs, which may provide a valuable source of additional housing for Reading's residents. The Council should adopt a more positive policy approach to the provision of PBSA, allowing it to be provided in Central Reading as well. WJG requests that Policy H12 is replaced with the following: "New student accommodation will be provided on or adjacent to existing further or higher education campuses, within Central Reading or as an extension or reconfiguration of existing student accommodation. There will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites".</p>	<p>Do not agree. The provision of student accommodation needs to be balanced against other types of housing. Although purpose built student housing can help to free up existing HMOs for use as family homes, it should not be sited in locations which could be used to help meet the more pressing need for general housing, particularly affordable housing.</p>

AWE plc and AWE plc on behalf of the Ministry of Defence (MOD)	H13	<p>AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of first: the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield; and secondly the possible increased risk to occupiers of more temporary structures characteristic of gypsy and travellers sites. AWE and MOD are concerned that the importance of policy OU2 and its application to ALL policies and proposed development within the DEPZ should be restated within policy H13 to avoid any confusion and to avoid any suggestion that a proposal that complies with these policies but not OU2 is otherwise compliant with the plan as a whole such that a decision to grant planning permission is in accordance with the development plan. This could undermine the effectiveness of OU2 in protecting the current and future operations at AWE Burghfield and public safety and therefore raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by including the following text within policy H13:</p> <p><i>“Any development proposals within the Detailed Emergency Planning Zone for AWE Burghfield must comply fully with policy OU2”.</i></p>	Do not agree. Policy OU2 will apply to all developments in Reading, including sites for gypsies and travellers. The Local Plan seeks to avoid repetition and duplication of policy.
Bracknell Forest Council	H13	<p>There are no changes proposed to the wording of Policy H13 ‘Provision for Gypsies and Travellers’. Policy H13 is a criteria based development management policy, with the supporting text setting out the local need. Paragraph 108 states there is a need (based on a Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment 2017) for 10-17 permanent pitches, a transit site of 5 pitches and 2 travelling showpeople plots. It is made clear in paragraph 109 that these needs cannot be met in Reading Borough and is stated that the Council is exploring options for meeting permanent needs outside the Borough.</p> <p>No update is provided on whether any progress has been made on meeting needs. However, a change to the target is proposed to the Monitoring Framework in Figure 11.1 from ‘TBC’ to ‘None’. It is not clear why the target does not match the identified need in paragraph 108, even though no sites are allocated.</p>	Agreed that the monitoring framework should be changed to match the need.
Environment Agency	H13	To ensure proposals for new sites or extensions to existing sites for gypsies, travellers and traveling show people are safe in regard to flood risk, we require policy H13 to include the need for the users of these types of development classified as highly vulnerable according to the NNPF Annex 3 to be safe ‘in an event of a flood’. This is supported by paragraph 179 in the NPPF. We previously at the Regulation 18 stage asked for the policy to be	Do not agree. No change proposed. The policy states “be located in line with national and local policy on flood risk, and not involve location of caravans in Flood Zone 3.”

		<p>amended to include this element. We note this has not been applied. In that regard we do not consider the plan to be sound as it is not consistent with national policy.</p> <p>Bullet point i) of policy H13 should be amended to state 'Have safe and convenient access onto the highway network and to an area of safe refuge in the event of a flood.'</p>	
West Berkshire Council	H13	<p>WBDC notes that there are existing needs identified, and that no sites have been identified which could meet the permanent or transit need. We support the inclusion of policy H13 which supports proposals for Gypsies and Traveller accommodation subject to certain criteria. WBDC needs to deliver 20 permanent Gypsy and Traveller pitches in the period to 2038. There is no requirement to identify a site for transit pitches, however WBDC's 2021 Gypsy, Traveller and Travelling Showpersons Assessment recommends that tolerated stopping places or negotiated stopping places should be provided. The allocations included within WBDC's existing Local Plan are being rolled forward into the LPR and no additional sites are proposed. WBDC has commenced work on a Gypsy and Traveller Accommodation Development Plan Document (DPD) which will contain policies and allocations to meet the Gypsy and Traveller accommodation needs. At this point in time, WBDC are unable to accommodate any of RBC's unmet needs. Nonetheless, as part of the Duty to Cooperate, WBDC will continue to liaise with RBC as work on the DPD progresses and will advise whether it will be possible to meet needs within West Berkshire district or not.</p>	Noted. No change required.
Akira Yamanaka Architects	H14	<p>Policy H14 'loss of parking areas or garages' It would be good if this included a definition of 'loss of garages'. When garages have not been in use for a prolonged period, they should not be counted as garages. The lack of clarity on this causes an additional burden to designers and developers.</p>	Do not agree. No change proposed. Even when a garage is not in use for a prolonged period, it is still considered to be a garage. The policy does not aim to prevent all loss of garages, but rather to prevent any possible negative impacts on the highway network.
AWE plc and AWE plc on behalf of the Ministry of Defence (MOD)	H14	<p>AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of first: the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield; and secondly that this policy could, if sites are located within the DEPZ, lead to an increase in population within the DEPZ. AWE and MOD are concerned that the importance of policy OU2 and its application to ALL policies and proposed development within the DEPZ should be restated within policy H14 to avoid any confusion and to avoid any suggestion that a proposal that complies with this policy</p>	Do not agree. Policy OU2 will apply to all developments in Reading, including suburban renewal proposals (which are highly unlikely to be within the DEPZ in any case as the only substantial residential area within the DEPZ has only recently been developed). The Local Plan seeks to avoid repetition and duplication of policy.

		but not OU2 is otherwise compliant with the plan as a whole such that a decision to grant planning permission is in accordance with the development plan. This could undermine the effectiveness of OU2 in protecting the current and future operations at AWE Burghfield and public safety and therefore raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by including the following text within policy H14: <i>“Any renewal and/or regeneration proposals within the Detailed Emergency Planning Zone for AWE Burghfield must comply fully with policy OU2”</i> .	
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	H14	<p>The ICB would like to reinstate our comments in the previous Regulation 18 consultation that any regeneration or renewal projects should not exacerbate the capacity of the nearby existing healthcare provisions. The proposed wording remains the same as the one proposed under the previous Regulation 18 consultation. While the ICB understands that supporting text 4.4.112 to Policy H14 refers to Dee Park regeneration, which is covered by a dedicated policy WR1 in the local plan, the purpose of this policy is to cover other potential regeneration or renewal projects across Reading Borough. There is a need to ensure this policy provides clear guidance for developers for any forthcoming renewal and regeneration projects.</p> <p>While the ICB agrees that any new renewal and regeneration development of residential areas will need to ensure adequate community facilities to serve the resulting community, there is a lack of clarification in the policy to set out how this can be achieved. The ICB has no dedicated capital funding in delivering any new or extended estates projects to accommodate any new population generated from those developments. Developer contributions or Community Infrastructure Levy (CIL) fundings will be required to support those projects. The policy should ensure that developer contributions or CIL fundings will be in place to help support the delivery of the relevant facilities. The agreed mitigations should also be subject to the agreement of relevant infrastructure providers. In terms of healthcare provision, it would be the ICB.</p> <p>The ICB has the following suggestion on the wording of Policy H14 to elaborate how developers can ensure adequate community facilities are provided to serve the resulting community:</p> <p><i>H14: RENEWAL AND REGENERATION OF RESIDENTIAL AREAS (Strategic policy)</i></p> <p><i>Where development would fulfil the above aims, it would generally be supported, subject to other policies in this plan and provided that:</i></p> <ul style="list-style-type: none"> <i>• There would be adequate community facilities to serve the resulting community, subject to the agreement with relevant infrastructure providers, including but not limited to the</i> 	Do not agree. It is unclear what additional benefit these changes would bring. It is considered that impacts on healthcare are best dealt with for all types of development within a single policy rather than being referred to individually for every type of development.

		<p><i>funding, contractual and delivery arrangement of the facilities. Developers are required to engage with NHS Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board (BOB-ICB) or such appropriate body at an early stage to discuss any offsite primary care mitigations if required.</i></p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	
Nexus Planning on behalf of Reading Heights Ltd and MYCO Ltd	H15	<p>Reading Heights and MYCO are supportive in principle of a specific co-living policy, but consider revisions are necessary for it to be positively prepared (in respect of making effective use of land, to meet the need for homes) and consistent with the National Planning Policy Framework, 2023 (“the 2023 Framework”), as would apply with the draft Local Plan being progressed under the transitional provisions of the National Planning Policy Framework, 2024 (“the 2024 Framework”).</p> <p>With regard to Policy H15 itself: the supporting text (paragraph 4.4.116) presents a minimum size threshold of 20 bedrooms for co-living development. Reading Heights and MYCO consider this threshold too low to viably achieve a sufficient range / standard of communal facilities and level of management necessary to ensure a high quality development. Instead, a minimum 40 bedroom size is more appropriate for development to successfully operate with the facilities and standards expected.</p> <p>Reading Heights and MYCO support the minimum private (18sqm) and communal space standards (3sqm or 4sqm depending on number of residents) in the policy, as well as a minimum three-month tenancy period.</p> <p>Likewise, there is support for the preferred spatial limitation, for co-living to be provided only in more accessible locations in Reading, where there is greatest access to employment, amenities and public transport.</p> <p>However, Reading Heights and MYCO is fundamentally concerned that the preferred policy seeks to exclude co-living development on sites that are “identified for general residential, as allocations or extant permissions”. This approach is too blunt without provision to be able to consider matters that may be highly relevant as to whether or not a specific site is suitable for co-living development. For instance, on a site that may have been promoted for Class C3 housing, there could be a range of reasons why such development has not been delivered, even if extant (say because a first phase has been delivered, such as the Site) – including financial viability; rapid changes to the urban context; and / or Reading’s dynamic socioeconomic and demographic influences. It is also the case that many sites in central Reading have already been promoted for</p>	<p>Noted. No change required.</p> <p>No change proposed. The minimum would not prevent schemes of at least 40 bedrooms coming forward. It simply represents that minimum amount of bedrooms that would be considered co-living by the Council.</p> <p>Noted. No change required.</p> <p>Noted. No change required.</p> <p>Do not agree. No change proposed. The provision of co-living accommodation needs to be balanced against other types of housing. Although co-living can help provide accommodation for specific groups, it should not be sited in locations which could be used to help meet the more pressing need for general housing, particularly affordable housing. If provision of general housing or affordable housing has not been delivered due to the reasons listed, this will be considered on a case-by-case basis.</p>

		residential development, at very least through the Council's call for sites exercise. Where co-living development would contribute towards the Council's housing supply as well as meeting a demonstrable need, the current preferred policy wording unnecessarily risks sterilising an otherwise suitable site. Consequentially, the policy wording would prohibit the ability to regenerate and make effective use of previously developed land, such as the Site contrary to paragraphs 123 – 126 of 2023 Framework. Co-living accommodation is a form of housing and should not be considered instead of the more traditional model of dwellings, but as a complementary form of accommodation to meet the growing demand from people who would choose not to live in self-contained homes and are deterred from traditional HMOs because of their poor standards.	
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	H15	<p>The ICB would like to reinstate our comments in the previous Regulation 18 consultation that this type of residential accommodation will inevitably have an impact to the nearby GP services, though this type of accommodation is defined as temporary in nature. Any prospect residents will still create a new demand to the nearby GP services, where most of the GP practices in Reading are already at or over capacity.</p> <p>From the draft policy, the ICB notes that this type of accommodation may not be suitable to deliver any onsite healthcare provision due to the nature of the prospect residents. The ICB considers that securing an offsite primary care mitigation will be more appropriate in this type of accommodation.</p> <p>The ICB has the following suggestion on the wording of Policy H15 to ensure developer contributions are made to support any primary care estates projects in the local area to serve the new population:</p> <p><i>H15: PURPOSE-BUILT SHARED LIVING ACCOMMODATION</i></p> <p><i>Development for purpose-built shared living accommodation will meet all of the following criteria:</i></p> <p><i>10. Developers are required to engage with NHS Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board (BOB-ICB) or such appropriate body at an early stage to discuss any offsite primary care mitigations if required. Developers are expected to carry out any required pre-project work at their own expenses to identify the primary care estates project(s) in accordance with the pre-project works. A contribution is made to provision of offsite primary care mitigations in the form of a financial contribution.</i></p> <p>The ICB also has the following suggestion on the supporting text to Policy H15. The ICB considers that the way of calculating the offsite primary care mitigation can follow the</p>	Do not agree. It is unclear what additional benefit these changes would bring. It is considered that impacts on healthcare are best dealt with for all types of development within a single policy rather than being referred to individually for every type of development.

		<p>proposed methodology of working out offsite affordable housing contribution. For example, a development of 80 co-living units would equate to 20 dwellings, and would generate 48 new population:</p> <p><i>4.4.121 This form of community living accommodation will generate new patients to the local healthcare provisions where they are already at or over capacity. Given the nature of this type of accommodation, an onsite healthcare provision is not considered to be suitable. On this basis, an off-site financial contribution towards primary care mitigations is generally required. The appropriate level of offsite primary care mitigation should be calculated by assuming that one dwelling equates to four units of accommodation.</i></p> <p>Unless the policy and the supporting text are reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	
Savills on behalf of Elder	H15	<p>Proposed amendments:</p> <p>Development for purpose-built shared living accommodation will meet all of the following criteria:</p> <p>1. It is located on a site that has not been identified for general residential (as plan allocations or extant permissions), unless any application is supported by viability evidence demonstrating that residential development would not be viable on the site, or the purpose-built shared living accommodation element would be in addition to the planned residential, it can be demonstrated that the purpose-built shared living development would:</p> <p>a. meet an identified housing need; b. contribute towards mixed and inclusive communities; and c. deliver the same or better quantum of housing delivery or would be in addition to the anticipated residential.</p> <p>2. It is located within the town centre or a 15-minute walk of the town centre, unless a clear justification for an alternative location is provided;</p> <p>3. It provides units for rent with minimum tenancy lengths of no less than three months;</p> <p>4. High quality, and well-placed on-site communal facilities and services are provided that are sufficient to meet the requirements of, and available to and easily accessible by, all residents of the proposal. At least 4 sq m of internal communal space will be provided per resident, decreasing to 3 sq m per resident where there would be more than 100 residents, which includes common work areas but excludes circulation space such as corridors and stairways. On-site communal facilities will offer at least:</p>	<p>Do not agree. No change proposed. The provision of co-living accommodation needs to be balanced against other types of housing. Although co-living can help provide accommodation for specific groups, it should not be sited in locations which could be used to help meet the more pressing need for general housing, particularly affordable housing. If provision of general housing or affordable housing has not been delivered due to the reasons listed, this will be considered on a case-by-case basis.</p>

		<ul style="list-style-type: none"> • Communal kitchen and dining facilities • Laundry and drying facilities • A concierge • Cleaning, maintenance and security services <p>5. The private units have an internal size of at least 18sqm, include a bathroom with shower, and are not capable of being used as self-contained dwellings;</p> <p>6. It is under a single management regime;</p> <p>7. The proposal is accompanied by a management plan, secured by Section 106 agreement, which demonstrates how the development, including the communal facilities, will be managed and maintained over its lifetime;</p> <p>8. The proposal is accompanied by a security strategy, provided at planning application stage and secured by condition or Section 106 agreement, setting out how crime and anti-social behaviour will be mitigated through design and management measures; and</p> <p>9. A contribution is made to provision of affordable housing at an equivalent level to policy H3.</p> <p>Justification on the type of contribution towards affordable housing should be provided with any application. This will The affordable housing contribution should take the form of either:</p> <ul style="list-style-type: none"> • an off-site financial contribution, unless • provision of on-site self-contained affordable dwellings can be provided that do not rely on, and operate independently from, the internal communal facilities, or • provision of on-site discounted market rent purpose-built shared living units. 	
Watkin Jones Group	H15	<p>Whilst WJG is largely supportive of draft Policy H15, it objects to Part 1 which requires that co-living is not located on sites identified for Class C3 residential (e.g. allocations or extant permissions), unless the co-living is in addition to the planned C3 residential. There may be scenarios where the development of an identified housing site for co-living may present a better option (e.g. the physical characteristics of a site does not lend itself to Class C3, co-living would make a more efficient redevelopment of a site, proximity to places of employment). NPPG, within the Housing Delivery Test Measurement Rule Book (2018) also confirms 1.8 co-living bedrooms equates to one Class C3 home. The delivery of co-living within the borough will also contribute towards housing delivery.</p>	<p>Do not agree. No change proposed. The provision of co-living accommodation needs to be balanced against other types of housing. Although co-living can help provide accommodation for specific groups, it should not be sited in locations which could be used to help meet the more pressing need for general housing, particularly affordable housing. If provision of general housing or</p>

		<p>To ensure that Part 1 of Policy H15 is effective, WJG requests that it is replaced with the following:</p> <p>“It is located on a site that has not been identified for general residential (as plan allocations or extant permissions), unless the purpose-built shared living accommodation element would be in addition to the planned residential, or unless the applicant has robustly demonstrated that the site would be better used for co-living or demonstrates that any existing or proposed Class C3 housing is not deliverable or viable”.</p>	affordable housing has not been delivered due to the reasons listed, this will be considered on a case-by-case basis.
Friends of the Earth	TR1	<p>TR1 and the Transport Strategy itself offer many great aspirations but in some respects is unclear on what it will actually expect to ‘achieve’:</p> <p>Section 9.3 of the Reading Transport Strategy 2040 says the CO2 performance indicator (point 11) is to halve emissions to 54 kt CO2e in 2040. We do not think this is compatible with Reading’s net zero aspirations. Also that document gives no performance indicators for either time lost to congestion, vehicle-km driven on the roads or modal shift.</p> <p>We would like to change the word ‘should’ to ‘must’ in the first line of this policy and the last line of 4.5.3.</p> <p>4.5.2 The predicted growth in trips presents a major challenge unless modal shift to active travel and/or public transport can be achieved</p>	<p>No change proposed. It is unclear what change to the plan is recommended by this comment.</p> <p>No change proposed. Changes to the Reading Transport Strategy 2040 are not within the scope of the Local Plan Partial Update.</p> <p>No change proposed. This is best addressed by text within the policy itself and under CC7.</p> <p>Agree, but no change required. The policy’s primary aim is to promote and improve sustainable transport within the Borough.</p>
Matt Rodda MP	TR1	<p>I am glad that the Local Plan recognises that new development should contribute appropriately to meeting the objectives of the Reading Transport Strategy, or any successor documents, and achieving the council’s objectives of: creating a clean and green Reading, supporting healthy lifestyles, enabling sustainable and inclusive growth, connecting people and places, and embracing smart solutions. The ambition has been set for Reading to achieve a net zero carbon status by 2030, and measures to improve active travel provisions and public transport will play a vital role in this. I am therefore pleased to note the emphasis that will be placed on the enhancement of walking, cycling and public transport facilities, often through integration into new developments, and that priority is due to be given to the implementation of major transport projects across the town.</p>	Noted. No change required.

Stantec on behalf of SEGRO plc	TR1	SEGRO note the increase of the requirement in the Pre-Submission Draft for non-residential developments of at least 10 spaces to provide 20% of spaces with an active electric vehicle charging point which has risen from the 10% provision in the adopted Reading Local Plan. SEGRO consider that the requirement for 20% of spaces to be provided with an active electric vehicle charging point is without sufficient evidence or viability testing. We therefore consider the 10% requirement in the adopted Reading Local Plan to be appropriate. SEGRO recognise the Council's desire to see additional electric vehicle charging infrastructure delivered to meet climate change and sustainability objectives and therefore suggest an alternative of providing provision for future connections for electric vehicle charging points for all spaces.	Do not agree. This approach has been tested in the Viability Testing Report and is not expected to affect viability.
Wokingham Borough Council	TR1	Policy TR1, alongside Policies TR5 and CC7, outline aspirations for sustainable transport but the Plan focuses on walking, cycling and public transport. The NPPF includes ultra-low and zero emission vehicles in its definition of sustainable forms of transport. Given that many trips to Reading originate beyond the borough, it is important that supporting infrastructure serves all forms of sustainable transport.	Noted. No change required.
Network Rail	TR1	Network Rail support the LPAs objectives in para 4.5.4 for transport and the need to consider the impact upon the rail Network and the need to maintain access to our assets both during and post construction. Para 4.5.5 makes reference to CIL contributions towards transport improvements. Under this objective we would look to seek contributions to stations impacted by commercial development such as increases in passenger footfall.	Noted. No changes required.
Transport for London	TR2	We welcome the changes made to paragraph 4.5.10 which sets out the position regarding Crossrail safeguarding as well as the intention to consult TfL regarding any applications within the safeguarding zone while safeguarding remains in place.	Noted. No change required.
Friends of the Earth	TR2	<u>East Reading Bus Rapid Transit:</u> We are disappointed that East Reading Bus Rapid Transit seems to still be promoted. A scheme on this route was rejected by Wokingham Borough Council because of impact on the Thames-side environment (used by people of East Reading) in that Borough, including bridge over River Kennet. It was not predicted to have significant impact on air quality or congestion. It would reduce local green space. This scheme should be abandoned and no further funding directed towards it. While bus rapid transit from Wokingham Borough is valuable the new bus lane on London Road (already implemented) provides that option. <u>Cross Thames Travel:</u> Measures to be assessed should prioritise road user charging and de-prioritises an additional road bridge which would have very high environmental and financial cost and encourage more and longer road-trips.	Do not agree. RBC has clarified its position in support of East Reading Bus Rapid Transit and the Third Thames Crossing and more information can be found in the Local Transport Plan (2040). Should an application come forward for either scheme, impacts on air quality and local green space would be further assessed.

Kidmore End Parish Council	TR2	Whilst my Council agrees that the Thames is a barrier to movement, it question how an additional Thames crossing east of Reading will mitigate congestion in Caversham. The Council remains opposed to an additional bridge crossing the Thames.	Do not agree. RBC has clarified its position in support of the Third Thames Crossing and more information can be found in the Local Transport Plan (2040).
Mark Drukker	TR2	There should be extra railway stations to reduce road traffic. Add a Southcote railway station on Burghfield Road, and support the addition of a railway station at Thames Valley Business Park. BRT does not stop at the right places. BRT should have extra stops where it passes shops, offices and sports grounds, and connect with local buses	Additional railway stations or additional BRT stops are not within the scope of the Local Plan.
Mr Sam D'Arcy-Darling	TR2	<p>I remain concerned that the council has failed to consider the localised passenger rail potential available to the local authority area particularly in terms of making provision for how BRT could interact with Tilehurst, Reading West, Reading Green Park, and Reading Stations.</p> <p>I am also deeply concerned that the plan demonstrates limited vision on the provision of link-services infrastructure as Reading station's on-ward travel capacity by bus and taxi is nearing operational limitations (in terms of buses exceeding sometimes) due to failure of the LA previously to plan for intermodal mass transit. This must be taken into consideration PRIOR to further developments occurring around the Station, and its surrounding link roads. I'm concerned that failure of RBC to recognise this may render the council further disadvantaged in planning application appeals, especially for land adjacent to the railway station, which could otherwise be put to public transport use, for instance, by creating a more dedicated bus infrastructure with further capacity for Reading Buses and others to operate from.</p>	<p>Additional railway stations are not within the scope of the Local Plan.</p> <p>Bus capacity is not within the scope of the Local Plan, but transport impacts of new developments will be assessed in detail on a case-by-case basis.</p>
National Highways	TR2	An additional crossing over the Thames can only help LRN and potentially the SRN too.	Noted. No change proposed.
Oxfordshire County Council	TR2	Reading Borough Council's Reg 18 statement of consultation report records the concerns we have raised and notes: 'RBC is aware of OCC's preferences and is currently undertaking joint working on this matter'. However, no changes to Reading Borough Council's Local Plan were made in response to our comments on the Regulation 18 consultation. The Regulation 19 Local Plan refers to 'Cross-Thames Travel' in Policy TR2 and shows an indicative crossing location (outside of Reading) on figure 4.6. Oxfordshire County Council's Local Transport and Connectivity Plan (LTCP), adopted in July 2022, outlines our vision to deliver a net-zero transport system, reduce car trips and	No changes proposed. As set out in the Local Transport Plan (2040), RBC remains aware of OCC's position and will continue to undertake joint working on the matter. Cross-Thames travel remains an issue of great significance

		<p>make walking, cycling, public and shared transport the natural first choice. These principles will guide our partnership working on cross-boundary transport matters moving forward. We also note that there was an approved motion by Oxfordshire County Council on 10th September 2019 in respect of a third Reading Thames crossing saying:</p> <ul style="list-style-type: none"> • Should a new bridge be built, it should be restricted to public transport, cyclists and pedestrians. • The bridge and necessary mitigation measures must not be considered as two separate projects, but as one project. <p>For further detail about our views on the objectives and major transport projects identified in the Reading Transport Strategy 2040, please see our response to the Reading Transport Strategy 2040 consultation.</p> <p>Oxfordshire County Council has not sought safeguarding for Cross-Thames Travel in the Regulation 19 South & Vale Joint Local Plan, and therefore supports there being no such safeguarding. We encourage a holistic approach to the issue and a review of options. We expect that Oxfordshire County Council will continue to be engaged on the Cross-Thames Travel Group and any future work. Given that this matter can be addressed outside of the Local Plan, and we continue to have a working relationship with Reading Borough and the other councils to address this, we do not think the text of the Reading Local Plan will have any material effect on what happens in Oxfordshire. However, if the Planning Inspectorate considers that there is a need for modifications in respect of any of the transport provisions in Policy TR2 which may affect Oxfordshire, we may make comments at the modifications consultation stage and seek to be heard on them.</p>	for Reading that needs to be reflected in the Local Plan.
Wokingham Borough Council	TR2	<p>Policy TR2 supports the expansion of the Bus Rapid Transit (BRT) network. The policy references proposals for the southern (A33) and eastern (A4) corridors, identified on the Proposals Map. Limited evidence has been provided to inform proposals which is an essential part of the Sustainability Assessment / Strategic Environmental Assessment process to remove, reduce or mitigate adverse effects. The adopted RBC Local Plan was supported by proposals to expand the network of Park & Ride sites in Wokingham Borough, serving destinations in Reading (generally retained in Figure 4.6). The Inspector's Examination Report (paragraph 77) considered these as necessary. The Plan suggests these might be replaced with mobility hubs, but these proposals are not supported by evidence to explain what form these hubs might take, how many might be necessary, where they might be located or any supporting infrastructure to enable longer range trips to shift mode to more sustainable alternatives. Whilst WBC are considering mobility hubs these are unlikely to be delivered until much later in the Plan period therefore RBC might need to support accelerated delivery close to the borough boundary.</p>	<p>Noted. No change proposed. The exact form of park and ride mobility hubs are not specified in the Local Plan or the Transport Strategy, but the Transport Strategy suggests that over time park and rides might evolve to become green mobility hubs that could include:</p> <ul style="list-style-type: none"> • Travel information station • Parcel collection • Recycling and waste point • Household goods refill station • Food share-house / community fridge

			<ul style="list-style-type: none"> • Repair café • Reuse shop / library of things <p>RBC will continue to work with neighbouring authorities including WBC to deliver these proposals over time.</p>
Mark Drukker	TR4	Little thought is given to visitors who live in villages outside Reading with little public transport, at times when there is no park and ride. There should be an electric car hire scheme, like the former bike hire, to reduce people having their own cars.	This is not within the scope of the Local Plan, although transport policies aim to support car hire schemes or bike hire schemes where possible within Reading. Outside of Reading's boundaries, this is out of the control of RBC.
Pang Valley Rambler Group of the Ramblers' Association	TR4	Whilst the promotion of cycling is laudable, we have concerns relating to the safety of pedestrians, particularly in relation to the Thames Path where the status appears to be confused. Its formal classification is a "Footpath" yet it is used extensively by cyclists. We have commented on this at length in the past especially in regard to the Council's former proposal to convert it to a joint use path. If the current situation is to continue we request that notices similar to those displayed by Remenham Parish Council are erected at intervals along the Thames Path within RBC area. A photograph of such a notice is attached.	This is not within the scope of the Local Plan.
Akira Yamanaka Architects	TR5	Policy TR5 4.5.22 'Parking Standards and Design Supplementary Planning Document (SPD). ', 'It will continue to apply until it is superseded by any more up-to-date version.' We consider that The SPD is out-of-date. In section 7.0, Car Parking Layout and Dimensions, "Parking spaces are recommended to be designed at 5000mm long x 2500mm wide, however..." The Council should consider the 'Manual for Street' standards of 4800mm long x 2400mm wide as an alternative to larger standards in their SPD. Larger cars are generally less sustainable, and minor differences in standards cause a lot of additional work for everyone involved, so we would recommend Reading revise its parking standards to align with the national standard described in 'Manual for Streets'.	Changes to the Parking Standards and Design SPD are not within the scope of the Local Plan.

John Wilkins	TR5	I have noted that RBC often want to restrict off road car parking spaces in new developments apparently as a way of reducing car use. Is there any evidence this works or does it just result in more cluttering of streets with parked cars?	There is significant evidence that reducing car parking results in reduced car journeys and reducing parking within town and city centres is widely considered to be one of the most effective ways to reduce traffic congestion.
University of Reading	TR5	<p>The University supports the updates proposed to this policy to reflect that EV charging for residential developments is generally now covered by the Building Regulations (Approved Document S). It is also supportive of the expansion of the policy to include a presumption in favour of charging infrastructure.</p> <p>However, the University has some concerns regarding increasing the EV charging requirement for non-residential developments where there are at least 10 spaces from 10% to 20%. It is not considered that there is sufficient justification for a requirement that goes beyond current buildings regulations (Approved Document S). It could quickly become redundant given the advancement of technology in this area and could place a considerable strain on electricity supplies. The demand for 'at-work' charging facilities is likely to plateau as increasing numbers of dedicated EV charging facilities come forward, as the speed of EV chargers increases and as more and more people have charging facilities at home. The Statement given in the House of Commons (on 13th December 2023) sets out the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. It is considered that this principle could also be applied to the provision of EV charging points. The approach taken for EV charging for residential developments should also be applied to non-residential development - the policy should be silent as requirements are now covered by the Building Regulations (Approved Document S). The policy is not considered to be sound as it not considered consistent with national policy, nor justified.</p>	<p>Noted. No change required.</p> <p>Do not agree. No change proposed. There is no government guidance to prohibit local authorities from setting requirements for EV charging. This proposed approach has been tested within the Local Plan Viability Testing report to ensure no negative effects on viability.</p>
Wokingham Borough Council	TR5	The densification of central Reading is generally supported. Policy TR5 places a requirement on developments to "...provide car and cycle parking are appropriate to accessibility..." Most of the proposed development locations are in high accessibility areas, as such WBC anticipate the car parking provision will be minimal. With an increased reliance on active travel, WBC assumes that the Infrastructure Delivery Plan (IDP) will deliver significant cycleway improvements – extending into Wokingham Borough. Whilst RBC has published a Local Cycle Walking Infrastructure Plan it is important that investment and infrastructure delivery are mutually conducive to exploiting the potential for active travel, requiring some refinement of the IDP.	Noted. The Transport Modelling report has now been provided to WBC and other partners demonstrating that there would not be significant cross-boundary impacts.

		Limited evidence has been provided suggesting development travel demands, with the exception of hotels, are forecast to be comparable with city locations. Table 3.1-4 suggests traffic demands are much lower than comparable land uses within 1.2km of town centres/stations elsewhere in England. Given the scale of development planned, the forecasts in Table 3.5 and Figure 3.2-5 suggest that material changes would occur to the WBC network that require further examination and mitigation. If the development forecasts form part of a wider 'Decide & Provide' approach to manage travel demand, it might be practical to reduce parking provision and/or align other parts of the IDP for non-car infrastructure/services. Until further evidence is provided, WBC is unable to support these plans.	
Caversham and District Residents Association	RL1	A significant proportion of the Borough's population live north of the River Thames. They have a need for retail provision, beyond what can be accommodated in the Local and District Centres. Many specialist retail outlets are unsuitable for town centre sites. With increasing development around the town centre, large retail outlets continue to close or relocate. The loss of Aldi and The Range will be keenly felt with the loss of more affordable and accessible retail. Access to the retail areas around the A33 corridor is essentially only possible by car and adds to cross town traffic. Flexibility in allocating sites for retail should reflect this.	No change required. The policy provides sufficiently flexibility for assessing proposals for retail. It should be noted, however, that the Commercial Development Needs Assessment found an overprovision of comparison goods floorspace.
Bracknell Forest Council	RL2	<p>Policy RL2 is now proposed as a strategic policy and the amount of floorspace required has been removed. This follows the results of an updated Commercial Development Needs Assessment which found an overprovision of comparison goods floorspace and only a very small need for convenience floorspace. No gaps in provision were identified for leisure. Changes proposed to the Monitoring Framework are consistent with this latest evidence.</p> <p>Further clarity would be helpful on the uses listed in paragraph 4.6.16 which lists 'general business uses (E use)' as 'non-centre uses'. In both the Partial Update Plan's glossary (Chapter 12) and in Annex 2 of the NPPF, offices are listed as a main town centre use, and so support for their location in designated centre is implicit (i.e. the sequential test would not be applicable).</p>	<p>Noted. No change required.</p> <p>The 'non-centre uses' in relation to this policy is not intended to reflect the NPPF or the need for the sequential approach, hence why different language is used, it is intended to clarify how the policy will operate in practice. Ground floor offices, unless open to the public in the financial and professional category, do not bring particular viability to smaller centres and are not generally appropriate in the key shopping frontages.</p>
Savills on behalf of Sorbon Estates Ltd	RL2	It is noted and supported that Policy RL2 is proposed to be updated to remove reference to a specific quantum of additional retail floorspace, based on the Commercial Development Needs Assessment (CDNA) (November 2024). As referred to at LPPU paragraph 4.6.9, the CDNA (2024) highlights an overprovision of comparison goods floorspace with a small positive need for convenience goods floorspace up to 2041.	<p>Noted. No change required.</p> <p>Noted. No change proposed.</p>

		<p>It should be noted that Reading Link Retail Park, whilst currently in retail use is neither allocated nor being promoted for these purposes. The buildings are old and the use is no longer making efficient use of the land. The Site is out of the town centre, where sequentially, retail uses would generally be avoided.</p> <p>Therefore, the retail strategy should continue to focus on allocated retail uses in the town centre and not prejudice the redevelopment of out-of-centre sites. This would be consistent with Paragraph 126 of the NPPF (2023), which requires policies to reflect changes in the demand for land. In addition paragraph 127 of the NPPF (2023) identifies that a positive approach should be taken for proposed alternative uses of land which are currently developed, but not allocated for a specific purpose in the plan. In particular, Paragraph 127 b) identifies that proposals should be supported to:</p> <p>“use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres and would be compatible with other policies in this Framework.” It is considered that given the clear and identified need for more housing in Reading, and the identified overprovision of comparison goods floorspace, Reading Link Retail Park presents a significant opportunity to deliver proposed alternative residential use, in accordance with the provisions of the NPPF (2023) above.</p>	<p>Noted. No change required. Reading Link Retail Park is identified in the Partial Update for residential development (SR4g).</p>
Mark Drukker	RL4	<p>To make walking attractive, and for walkers to feel safe, the current poor LED street lighting must be improved. Streets are too dark at night. The only good LED street lights are in Broad Street. To make walking more inclusive, there should be alternatives to bridges for those who suffer from heights.</p>	<p>This is not within the scope of the Local Plan.</p>
Bracknell Forest Council	RL5	<p>The supporting text to Policy RL5 (paragraph 4.6.28) lists impacts that are of particular significance to Reading. It is considered that there should also be a reference to centres outside Reading Borough, where appropriate.</p>	<p>No change proposed. The criteria do not specify centres inside or outside Reading, and impact on centres outside Reading are considered where appropriate under the existing policy.</p>
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	OU1	<p>Paragraph 4.7.2 of the supporting text to Policy OU1 sets out that health facilities are classified as community facilities. Policy OU1 also sets out that proposals for new, extended or improved community facilities will be acceptable, where this will involve co-location of facilities on a single site. The ICB welcomes the concept of co-location of facilities on a single site, but it is not clear from the Policy or the supporting text how this can be achieved, such as how the buildings can be co-shared with other service providers if they have different timeframe of their service contracts. While the ICB appreciates that the level of details will be discussed at the planning application stage, the Policy should at</p>	<p>Noted. No change proposed. It is not considered necessary to provide further detail with regard to co-location suitability for GP services as this will be assessed on a site-by-site basis.</p> <p>Noted. No change required. The support for intensification on existing</p>

		<p>least provide further details about this co-location proposal. The ICB considers that this can be covered by a supplementary planning document to further explain the concept of co-location and how to coordinate the provision of services with different service providers. The ICB is delighted to work with the Councils to ensure that any co-location proposal is suitable for the provision of GP services.</p> <p>Policy OU1 also sets out that proposals for onsite intensification of healthcare facilities will be supported. However, onsite intensification of existing GP premises to provide additional clinical capacity is not always achievable as it is subject to the physical context of the site and whether GP providers agree to have this intensification. Any intensification of existing GP premises will have rent implications to the ICB. The ICB will need to make sure any works will be financially and operationally viable. Importantly, the feasibility of this intensification work will need to be professionally assessed prior to the commencement of any intensification works where this piece of work will need to be funded.</p> <p>The ICB has attempted to explore other sources of fundings to support this, which includes engaging with the Council to explore the potential to use CIL fundings to financially support primary care estates projects. However, the ICB understands that the Council has no plan to allocate any CIL fundings towards primary care estates projects. In an absence of the commissioning of any technical feasibility work, the ICB would raise serious concerns regarding the practicability of having the proposed onsite intensification of healthcare facilities.</p> <p>Due to the complexity of the system of how GP NHS contracts are funded by the ICB, the ICB considers that there is a need to have a dedicated healthcare provision policy in the draft Local Plan instead of incorporating into the community facility policy. The ICB proposes to create a new dedicated Policy OU1A for healthcare provision. The new policy can set out clearly how healthcare provision should be delivered including onsite and offsite mitigations and developers will need to work with the ICB at an early stage to ensure the mitigation(s) to be provided must be agreed, financially and operationally viable.</p> <p>The wording related to healthcare in Policy OU1 should be removed and the ICB has the following recommendation as follows:</p> <p><i>OU1: NEW AND EXISTING COMMUNITY FACILITIES (Strategic policy)</i></p> <p><i>Proposals for new, extended, or improved community facilities will be acceptable, particularly where this will involve co-location of facilities on a single site. Proposals for on-site intensification of important facilities, such as schools, will be supported, subject to</i></p>	<p>GP premises does not mean that this will be appropriate in all cases. This would be assessed individually should the surgery put forward a proposal. It is not within the scope of the Local Plan to consider rent implications for the ICB.</p> <p>The Council has been working closely to discuss opportunities for CIL spending with regard to primary care projects. The Council agrees with the ICB that there is an urgent need for fit-for-purpose GP premises within the Borough and the Local Plan has highlighted opportunities in various allocations, particularly on the ground floor of town centre uses.</p> <p>Do not agree. It is unclear what additional benefit a new policy would provide. As stated earlier, it is considered that impacts on healthcare are best dealt with for all types of development within a single policy (CC9) and in individual allocations rather than across many policies. Each element of the proposed text in the ICB's proposed policy OU1A is addressed within the Partial Update, including viability, means of travel, scale, quality of life, etc. Our experience of reorganisation within primary healthcare suggests that it would also be unwise for a plan with a 15 year lifetime to rely so heavily on a single named organisation.</p>
--	--	---	--

		<p><i>other policies in the plan. Proposals for additional development for further and higher education will only be acceptable where it can be demonstrated that it would not lead to a material increase in the need for student accommodation, or that it will be supported by an appropriate increase in existing or planned student accommodation.</i></p> <p><i>On-site intensification of some facilities, particularly schools, may result in some loss of open areas. This may be acceptable where the impact on open areas is minimised, and the area has no specific use, or where that use can satisfactorily be accommodated elsewhere on the site, subject to other policies in the plan. The above does not include loss of sports pitches and playing fields, which should only be developed where:</i></p> <p><i>A) an assessment clearly shows the area to be surplus to requirements; or</i></p> <p><i>B) the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i></p> <p><i>C) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</i></p> <p><i>New community facilities should be located where there is a choice of means of travel (including walking and cycling), and in existing centres where possible. Where a proposal for a new school meets a clear need, and it would otherwise accord with national and local policy, it will be acceptable on sites identified for residential or other development.</i></p> <p><i>Proposals involving the redevelopment of existing community facilities for non-community uses will not be permitted, unless it can be clearly demonstrated that there is no longer a need to retain that facility.</i></p> <p>The ICB has the following suggestions on the new Policy OU1A related to healthcare provision:</p> <p>OU1A: HEALTHCARE PROVISION (Strategic policy)</p> <p><i>Proposals for improving, extending or upgrading existing healthcare provisions will only be supported if it is agreed by the NHS Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board (BOB-ICB) or such appropriate body. Developers are expected to carry out a pre-project work at their own expenses, subject to the agreement with BOB-ICB, the identified estate project(s) would be able to support the existing GP surgeries in the local area to support the new population growth. Subject to the scale of the project(s), they may need to be co-funded by developments in the local area.</i></p>	
--	--	---	--

		<p><i>New GP surgeries will only be supported with associated supporting infrastructure, such as parking and landscaping and it is agreed by the BOB/ICB. Developers are expected to carry out a pre-project work at their own expenses, subject to the agreement with BOB-ICB to identify the required size of the facility. Subject to the agreement with BOB-ICB, the provision and associated infrastructure must meet the following criteria:</i></p> <p><i>a) Must be operationally and financially viable;</i></p> <p><i>b) Must be delivered in accordance with the agreed pre-project work and in line with the Department of Health Building Note 11-01 (or any successor documents); and</i></p> <p><i>c) Should be located where there is a choice of means of travel (including walking and cycling), and in existing centers where possible.</i></p> <p><i>d) Developers are expected to build and deliver the completed (i.e., “turnkey”) facility including its associated infrastructure to BOB-ICB.</i></p> <p><i>e) Subject to the scale of the project(s), they may need to be co-funded by developments in the local area.</i></p> <p><i>Proposals involving the redevelopment of existing healthcare facilities for non-healthcare uses will not be permitted, unless it can be clearly demonstrated that there is no longer a need to retain that facility, and an appropriate mitigation is identified to ensure there is no material impact to the local GP services.</i></p> <p>The ICB also has the following suggestions on supporting text to the new Policy OU1A related to healthcare provision:</p> <p><i>1. Quality of life for the residents of Reading is one of the key elements of the vision for the borough. A good quality of life is not only desirable, but also ensures that Reading remains attractive to investment. The provision of sufficient high quality healthcare provision is crucial to ensuring that Reading is a place in which people want to live and continue living. Reading Borough Council and NHS Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board (BOB-ICB) are within the same Buckinghamshire, Oxfordshire and Berkshire Integrated Care System (ICS). The aim of an ICS is to improve health and care services, with a focus on prevention, better outcomes and reducing health inequalities. The ICS would allow both the Council and BOB-ICB to work together in partnership to continue to support local social and economic development, including to ensure the adequate provision of healthcare services to residents of Reading.</i></p>	
--	--	--	--

		<p><i>2. As a primary care commissioner, BOB-ICB has the delegated responsibility to ensure all primary care provisions are operationally and financially viable as those services are funded by BOB-ICB through reimbursement of rents and business rates based on the existing ONS population data. The District Valuer will formally assess the level of rent as required and BOB-ICB will reimburse the Valuer approved rent. However, it is important to note that BOB-ICB has no dedicated capital funding for any primary care estates development, including the commissioning of any pre-project works and the projects for any new population grown and development.</i></p> <p><i>3. The range and quality of healthcare facilities serving Reading's communities should be improved. Retaining important facilities will be essential. The provision of a mix of compatible community services including healthcare services on a single site (or known as co-location) will be encouraged but subject to the agreement among the Council, BOB-ICB, relevant healthcare service providers and other service providers. The Council is expected to produce a supplementary planning document to further elaborate how this co-location can be delivered in detail.</i></p> <p>Unless the policy and the supporting text are reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	
Sport England	OU1	<p>Sport England is supportive of this policy as it aligns with the National Planning Policy Framework Paragraph 103 and our own planning policies to protect playing fields.</p> <p>However, should the bullet points not be a, b, and c which are struck through and not b, c and d. there is no a.</p>	Change proposed to correct bullet points.
Wokingham Borough Council	OU1	<p>WBC supports the proposed general reliance on existing mainstream education provision in the Plan but notes that the proposals carry a low-level risk of insufficient school places being achieved within Reading Borough. Most local authorities with education responsibilities are managing the effects of a falling birth rate on school rolls. Conversely, new housing development will bring additional children (credible child yield rates for new homes are set out in the Plan). However, this impact on demand may be localised, and at a borough level may not offset the roll reductions created by the falling birth rate. Moreover, in the context of new communities can rely on existing education provision either within walking distance of their homes or that is accessible by sustainable modes of travel. If the borough child population were to increase (or capacity be reduced) in the period to 2041 beyond borough school capacity, a risk of overflow to schools within Wokingham Borough would arise. Currently there is some capacity in two key accessible areas (Earley and Woodley, but not Shinfield) but if birth numbers had risen across the west of Berkshire area, there would be a risk that some families from Wokingham Borough</p>	Noted. The Infrastructure Delivery Plan has not identified any need for additional general primary and secondary capacity as a result of planned levels of development. Education place planning is generally undertaken on a five year cycle, and if this were to change we would expect a five-yearly review of the Local Plan to highlight this matter, which might lead to a need to update this or other policies. New education capacity can also be brought forward outside the Local Plan process, as was the case

		being unable to secure local places. WBC therefore seeks reassurance and wishes to understand the measures which would be activated to ensure that availability of increased capacity, should these circumstances arise.	with the recently opened River Academy.
Environment Agency	OU2	We have reviewed policy OU2 Hazardous Installations and are happy with the proposed wording of this strategic policy.	Noted. No change required.
Lichfields on behalf of Mapletree Investments Pte Limited	OU2	<p>They have no comments on the majority of emerging Policy OU2 (much of which is consistent with the current policy) but consider that part of the provisions of the additional text, relating to DEPZ being “subsequently amended” within the draft policy is not appropriate and inconsistent for the reasons amplified below.</p> <p>As drafted Policy OU2 contradicts a very recent appeal decision issued by the Planning Inspectorate (PINS) after the Regulation 19 consultation process began. The appeal decision, issued on 18th November 2024 permitted a residential proposal for 32 homes in West Berkshire (PINS Ref: APP/W0340/W/22/3312261) (the ‘West Berkshire appeal’) following the earlier refusal of planning permission by West Berkshire Council on a site within the DEPZ of AWE Burghfield.</p> <p>In their report the Inspector identified adopted West Berkshire Core Strategy Policy CS8 and noted West Berkshires suggestion that the subsequent change to the DEPZ (in 2020) required a change to the way that Policy CS8 applied. He rejected the Councils view stating (paragraph 21):</p> <p>“I consider the suggested substitution of the DEPZ for the ICZ would alter the wording of that development plan policy to such an extent that it would fundamentally change its meaning and intent. It would greatly expand the area within which development proposals are likely to be refused and would result in a far more restrictive development plan policy than that which was intended at the time of adoption. It would also result in considerable uncertainty as to the approach the Council is likely to take to development within the DEPZ.”</p> <p>Importantly the appeal discussed highlights that the DEPZ restrictions on this site are in the form of a planning ‘material considerations’ rather than an ‘embargo’.</p> <p>The West Berkshire appeal decision indicates that any changes to the DEPZ should not effectively be automatically imported into adopted Local Plan policies given the adverse reasons identified in the recent West Berkshire appeal.</p>	Do not agree. The issue appears to be that the adopted West Berkshire policy did not anticipate that changes to the ICZ/DEPZ could occur. The proposed update to OU2 seeks to address this issue by allowing for such changes to be considered as and when they occur, to reflect the importance of the constraint and the important legislative underpinnings of the change that did recently occur to the DEPZ.

		Mapletree consider that the wording of draft Policy OU2 should be amended to delete the reference that the scope and content of the policy is directly “or as subsequently amended” between Local Plan cycles	
ONR	OU2	<p>ONR supports the soundness of overall plan and policies as it relates to its approach towards not allocating residential sites in the Detailed Emergency Planning Zone (“DEPZ”) of AWE Burghfield (“AWE(B)”).</p> <p>Your neighbouring local authority, West Berkshire District Council (“WBDC”), hosts the nuclear sites of AWE Aldermaston and AWE Burghfield. The West Berkshire Local Plan Review 2022-2039 (Submission Draft January 2023) (LPR) was submitted for Examination on 31 March 2023. WBDC has not allocated any sites in the DEPZ for residential development and did not carry forward an existing allocation in the DEPZ (HSA16).</p> <p>The examining Inspector published some interim findings and further action points on the 19 July 2024. In these interim findings, the examining inspector recognised that the AWE sites represent a constraint on development. The Inspector wrote, “The AONB, areas of flood risk and the two Atomic Weapon Establishments, along with other constraints, mean that opportunities to identify further sites that are suitable for housing development are limited having regard to national policy and the Plan’s spatial strategy.”</p> <p>Your approach to residential site allocation ensures that there is a consistent development management approach across the entirety of the AWE(B) DEPZ.</p> <p>To provide clarity in making planning decisions for applications within the DEPZ and consistency with neighbouring local authorities, it would be helpful to include a paragraph similar to that discussed below in Policy SP4 of the West Berkshire District Council – Local Plan Review stating that ‘Development within the DEPZ is likely to be refused planning permission where the ONR, as regulator of the nuclear licensed sites, advises against the proposed development.’</p>	<p>Noted.</p> <p>It is considered that the ONR recommendation will need to be accorded weight on the basis of the policy criteria.</p>
Stantec on behalf of SEGRO plc	OU2	<p>Given the Site (SR1) is the largest employment allocation in the adopted Local Plan and Local Plan Partial Update, SEGRO consider that the geographical extent and amount of floorspace should not be restricted or limited by the DEPZ and request that reference to this is made within the policy. This is particularly relevant given the Site forms one of the only available spaces for development within the urban area of Reading that can accommodate a strategic quantum of employment space.</p> <p>It is recognised that a significant employment need remains in Reading and its neighbouring authorities, as evidenced by the existing demand and supply for employment</p>	<p>Do not agree. The importance of this site to delivering employment needs is recognised. However, the importance of the DEPZ and associated issues with the Off-Site Emergency Plan is also recognised, and it is not considered appropriate for the allocation policy to ignore the issue, as</p>

		<p>and logistics space. It is considered that recognition needs to be given to existing allocations identified in the adopted Local Plan Partial Update.</p> <p>Therefore, it is requested that Policy OU2 has regard to the existing allocations within the adopted Local Plan and the proposed floorspace delivered by these proposals is not restricted, and reviewed on a site-specific basis.</p>	to do so could put those working in the area at risk as well as contribute to overwhelming the OSEP.
Stantec on behalf of St Edwards Homes Limited	OU2	<p>We welcome the reference to the Plan or its successor and consider reference to potential future alternative plans is important for soundness given the potential for future updates or changes. However, development sites may be able to demonstrate that any risks they generate are mitigated through other measures including sufficient alerting and shelter arrangements which will alleviate the potential impact on the authorities responding to the off-site consequences of an incident at AWE Burghfield.</p> <p>In this regard, by focusing only on the Off-Site Emergency Plan rather than also allowing for alternative routes to demonstrating safety, the proposed policy wording will potentially inhibit development which could otherwise be safely occupied. The benefits which could be delivered by development, including much needed homes, could be unnecessarily foregone as a result. In the context of an identified need for housing in the Borough, we do not therefore consider that the policy is positively prepared or sound.</p> <p>We therefore recommend that the policy is worded so as to allow for such circumstances by requiring that increases in population within the DEPZ will not be acceptable unless appropriate emergency plans are in place. The policy could also require pre-application engagement with Emergency Planners to ensure that safety measures are appropriately considered.</p>	Do not agree. In the event of an incident at AWE Burghfield, it is important that emergency plans are co-ordinated and complementary, and this is achieved through the Off-Site Emergency Plan. Sheltering is likely to be part of any approach to emergency measures in the DEPZ, but it is not likely to be a long-term solution, and at some point residents would need to leave their homes, likely whilst emergency measures are still in place.
West Berkshire Council	OU2	<p>The principles and intention of this policy are strongly supported. There are concerns that the policy and supporting information is not as clear as it could be though. In this context, WBDC suggests the policy and its supporting text would benefit from some clarity, including additional specifics in relation to ONR land use policy criteria and associated commentary where there are gaps and tightening required as follows:</p> <p>Policy text:</p> <p>Overall, it is considered that having the information in relation to hazardous substances concerns, hazardous sites or pipelines with a separate paragraph in relation to AWE Burghfield matters in the same policy is confusing, not least since there is a separate heading in the explanatory notes in relation to AWE Burghfield. It is therefore recommended that they are split to make clear the distinction such that hazardous</p>	<p>Partially agreed. Changes proposed.</p> <p>It is agreed that changes should be made to refer to the ONR land use planning consultation procedures and to clarify the consultation processes.</p> <p>It is not agreed that the policy needs to be split, as it does not cause any particular confusion.</p> <p>In terms of point b, the change to and/or would result in a development proposal only needing to fulfil one of</p>

		<p>substances concerns, hazardous sites or pipelines in the main relate to Control of Major Accident Hazard Regulations 2025 (COMAH) sites and Major Accident Hazard Pipelines 1996 (MAHP) as defined by the Health and Safety Executive. It is recommended the additional policy paragraph in relation to AWE in the strategic policy, regardless of splitting it into a new separate policy, is changed for the following reasons:</p> <p>a. There is no mention of the consultation zones referred to and used in the ONR land use planning process so the Outer Consultation Zone, 12km zone and special cases as detailed in their website: Land use planning Office for Nuclear Regulation.</p> <p>b. in that the first bullet point at the end is amended to be and/or relating to the second bullet point.</p> <p>c. As regulator, should the ONR recommend refusal, the policy should make clear that this recommendation will be given significant weight in the decision making process.</p> <p>d. Reference needs to be made that the 'zones' size may change overtime as a result of legislation, guidance or operational changes on the AWE site.</p> <p>Supporting text:</p> <p>4.7.14. - this paragraph appears to relate mainly to the COMAH sites and therefore the additional commentary relating to 'and, for nuclear licensed sites, the Office for Nuclear Regulation (ONR), acting jointly with.....' is incorrect for COMAH sites, appears to contradict itself later in the same paragraph and is generally confusing. As a result, as a minimum the paragraph needs to be reworded to be clearer, and if not, the elements relating to nuclear sites removed and placed in a separate policy for clarity.</p> <p>Para 4.7.15 - it is correct to remove inner/middle and outer zones however as detailed above the full details of the ONR land use planning consultation criteria should be referred to, noting these can change and therefore reference to their website is advised to allow for these changes.</p> <p>Para 4.7.16 - this paragraph could be clearer and reworded for accuracy in that the process is that Emergency Planning within RBC will be consulted, who along with WBDC, who are the responsible Council for the AWE Off-Site Emergency Plan (OSEP), along with the AWE Off-Site Emergency Planning Group, as necessary, are best placed to judge how</p>	<p>these criteria, which is surely not the intention.</p> <p>The ONR recommendation will need to be accorded weight on the basis of the policy criteria.</p> <p>The supporting text already states that the DEPZ boundary may change over time.</p> <p>The text preceding the AWE Burghfield heading is general and not specific to COMAH sites.</p> <p>Paragraph 4.7.17 is a reflection of a continued commitment to work together to monitor development levels, as is already the case.</p>
--	--	--	--

		<p>the proposal will impact the OSEP and therefore the health, safety and wellbeing of the community.</p> <p>The second sentence in paragraph 4.7.16 should also relate to the ONR land use planning process and website.</p> <p>Para 4.7.17 - it is unclear as to the reason for this paragraph.</p>	
Wokingham Borough Council	OU2	<p>WBC welcomes the recognition of AWE Burghfield within Policy OU2 and the approach to development proposals within the Detailed Emergency Planning Zone (DEPZ). It is noted however that the policy makes no reference to the other consultation zones identified by the Office for Nuclear Regulation (ONR) and as a result is considered unsound. WBC suggest the policy and supporting text is modified to include reference to the consultation zones surrounding AWE Burghfield set by ONR and proposals for development within all these zones being managed in the interests of public safety, emergency response, and national security and defence requirements. Such a modification would be consistent with the emerging policies in both the Wokingham Borough Council Local Plan Update Proposed Submission Plan and West Berkshire District Council Local Plan Review, which is currently at examination.</p>	<p>Change proposed. The supporting text should be amended to refer to these other consultation zones and refer to the ONR website.</p>
Woolf Bond Planning Ltd	OU2	<p>a) It is not positively prepared as the approach hinders the ability of the plan as a whole to address the areas assessed needs;</p> <p>b) It is not justified since it is not supported by proportionate evidence;</p> <p>c) It is not justified as no evidence is provided indicating that either the existing off-site plan cannot accommodate additional residents/people within the vicinity of AWE;</p> <p>d) It is not justified as the potential for other measures as refinements to the current plan which would also provide further capacity to enable it to be activated to focus on the locations where sheltering could be necessary as the solution. Such further measures could entail installation of sensors providing continual information on the weather conditions and a dynamic illustrative of the associated zones within which any off-site plan needs to be activated. Such a dynamic real time solution to identifying the activation of any off-site plan would reflect the clear approach in REPIR to avoiding the worry and harm to people regarding the unnecessary inclusion of zones following the unlikely incident.</p>	<p>It is not agreed that the proposed amendments fail these tests.</p> <p>In the event of an incident at AWE Burghfield, it is important that emergency plans are co-ordinated and complementary, and this is achieved through the Off-Site Emergency Plan. Sheltering is likely to be part of any approach to emergency measures in the DEPZ, but it is not likely to be a long-term solution, and at some point residents would need to leave their homes, likely whilst emergency measures are still in place.</p> <p>RBC is not responsible for the definition of the DEPZ, and cannot change its boundaries to reflect the Urgent Protection Zone.</p>

		<p>e) It is also not justified as the approach does not take account of reasonable alternatives.</p> <p>f) It is not effective as it is not deliverable.</p> <p>g) The approach is also inconsistent with national policy in failing to comply with paragraph 38 of the NPPF as it is not supported by a proportionate up to date evidence base.</p> <p>h) It is also inconsistent with national policy as the approach to defining the zones around AWE does not accord with the guidance in REPPiR, especially regarding avoiding the inclusion of too many people within the remit of an off-site plan.</p> <p>Amendments proposed to the policy are omitted, alongside a reduction in the extent of the DEPZ so it directly reflects the Urgent Protective Actions Zone</p>	
AWE plc and AWE plc on behalf of the Ministry of Defence (MOD)	OU2, Para 4.7.15, 4.7.16, 4.7.17	<p>AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) strongly support the principle of Policy OU2 and its intention to ensure the effective management of development located within the Detailed Emergency Planning Zones (DEPZ) for AWE Burghfield. The policy clearly recognises the land use implications of these licensed nuclear installations for future development within the Local Plan area. The policy also recognises the critical importance of land use decisions being managed in the interests of public safety, emergency response, and national security and defence requirements.</p> <p>However, AWE and MOD consider that there are a number of key matters which are only addressed in the supporting text rather than the policy itself and that this risks undermining the effectiveness of the policy. Modifications are therefore required in order to ensure soundness over the plan period.</p> <p>Paragraph 4.7.15 explains that the DEPZ is subject to change. This is entirely correct. However, given that the point is of critical importance to the proper operation of Policy OU2 AWE and MOD consider that this fundamental point should be reflected in the wording of the policy itself. The wording should also refer to all the consultations zones and consultation criteria associated with AWE B safety zones. Furthermore, although paragraph 4.7.16 states that the emergency planners, Office for Nuclear Regulation, AWE and MOD should be consulted on all development proposals within the DEPZ which could result in a population increase AWE and MOD consider that the policy should explicitly state this requirement for</p>	<p>Partially agreed. Change proposed.</p> <p>Agreed that the policy should change to reference the OSEP at the time of the application and that the wording should reflect the current and future operations and defence capabilities.</p> <p>Also agreed that reference should be made to the other consultation zones, although as the guidance may change during the plan period, this is best done as a cross-reference to the ONR website.</p> <p>A number of comments suggest that matters that are in the supporting text should instead be in the policy. This is not agreed as it risks lengthening and therefore diluting the clear statements in the policy. These matters are best dealt with in the supporting text.</p>

		<p>ANY development located within the DEPZ, consultation zones and which satisfies the relevant consultation criteria.</p> <p>AWE and MOD strongly support Policy OU2, which states that development proposals shown on the Proposals Map which lead to an increase in population will not be acceptable unless specified criteria are met. However, AWE and MOD consider that a further criterion should be added which makes clear that proposals will be refused unless the Office for Nuclear Regulation (ONR) does not advise against the proposals. This will ensure that appropriate weight is given to the ONR's views as the expert consultee on nuclear safety issues. If the ONR advises against the development proposals then that should result in a refusal.</p> <p>It is important to AWE and MOD that the policy reflects not just the potential impact of development proposals upon the security and future of the AWE sites but be more specific about the need to protect current and future overall defence capability. The most recent Government announcement within the Strategic Defence review published in July 2024 restates the vital importance of ensuring that nothing jeopardises or limits AWE's unique role. AWE and MOD believe it is important to reflect this in the policy and so suggests that is amended as set out below.</p> <p>AWE and MOD suggest that the reference to the "AWE B Off-Site Emergency Plan" should include text to (a) make clear that the relevant plan is the one that is in place at the time the decision on the application is made and (b) reflect any future change in statutory requirements which results in the plan being called something different.</p> <p>AWE and MOD consider that MOD's views on any particular development proposals should also be referred to in the policy.</p> <p>AWE and MOD proposed modifications are consistent with the approach that has been taken by Inspectors on a number of recent appeal decisions for residential development within the DEPZs for AWE A and AWE B. In addition, AWE and MOD have been mindful of the approach taken by the Inspector into the West Berkshire District Council Local Plan which requires modifications to address soundness issues. The suggested modifications are consistent with the strengthening of the policy protection for AWE.</p> <p>1. Delete paragraph 4.7.16 and insert the following into the policy as an additional paragraph:</p> <p>"In determining applications, emergency planners, the Office for Nuclear Regulation and AWE plc/Ministry of Defence will be consulted on all development proposals:</p>	<p>The ONR recommendation will need to be accorded weight on the basis of the policy criteria.</p>
--	--	---	--

		<p>a) within the Detailed Emergency Planning Zone (DEPZ) for AWE Aldermaston and AWE Burghfield as defined under the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (as may be amended or replaced from time to time);</p> <p>b) within the Outer Consultation Zone (OCZ) for AWE Aldermaston and AWE Burghfield;</p> <p>c) within the 12km consultation zone for AWE Aldermaston and AWE Burghfield;</p> <p>d) within any other land use planning consultation zones for AWE Aldermaston and AWE Burghfield which may be specified by the Office for Nuclear Regulation (or any successor body) from time to time, and which in each case meet the Office for Nuclear Regulation's (or any successor body's) land use planning consultation criteria for the relevant zone as may be updated from time to time. The geographic extent of the DEPZ and OCZ shall be that which is applicable at the date the relevant application is determined."</p> <p>2. An additional criterion should be inserted in the policy in relation to acceptability of development within the DEPZ which reads: "the Office for Nuclear Regulation (or any successor body), as regulator of the nuclear licensed sites at AWE Aldermaston and AWE Burghfield and the relevant regulator under Radiation (Emergency Preparedness and Public Information) Regulations 2019 (as may be amended or replaced from time to time), does not advise against the proposed development." Alternatively, a new Policy could be inserted which reads: "Development proposals will be refused where the Office for Nuclear Regulation (or any successor body) advises against the proposal."</p> <p>3. Delete "future of AWE B" in the policy and insert "current and future operations and defence capabilities";</p> <p>4. Delete the reference to "AWE B Off-Site Emergency Plan" in the policy and replace with: "the Off-Site Emergency Plan(s) for AWE Aldermaston and AWE Burghfield that is/are in place pursuant to the requirements of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (as may be amended or replaced from time to time) at the time the application is determined (or such alternative plan serving materially the same purpose).</p>	
National Highways	OU4	<i>'Highways England'</i> should be replaced with <i>'National Highways'</i> .	Change proposed.
NHS Buckinghamshire, Oxfordshire and	Section 5: Central Reading	The ICB notes that 8,700 new homes will be delivered on or before 2041 and initially the Council is proposing only 7,600 new homes to be delivered before 2036. Deducting 749	Noted. No change required.

Berkshire West Integrated Care Board	<p>homes which are already completed, there is a total of 7,951 new homes to be delivered before 2041.</p> <p>As all existing GP Practices are already at or over capacity in Central Reading, the ICB is currently working closely with our local GP providers and relevant stakeholders to identify a long-term solution to support the increasing demand on primary care services in Central Reading with the proposed housing growth. The ICB considers that there is an opportunity to deliver new primary healthcare facilities in Central Reading to support the increasing demand for primary healthcare services generated from the new housing growth in the area. This is important to ensure that primary care mitigation is agreed and provided in any forthcoming developments to ensure adequate capacity is provided to accommodate new patients generated from those new homes. Primary care mitigations can be provided through making a financial contribution towards primary care to support an identified project to expand or reconfigure the existing premises if they have the potential to do so or to provide a new onsite healthcare provision, where any onsite or offsite proposals must be discussed with the ICB at an early stage to ensure that the provision to be delivered is agreed and importantly is operationally and financially viable to the ICB. This also reinstates the importance of having a standalone Policy OU1A related to healthcare provision in this Local Plan. The ICB considers that there is a need to outline the current situation of primary healthcare services in Central Reading in this Local Plan. The ICB has the following suggestions on the main text to Section 5.1 Area Context:</p> <p><i>5.1.8 All existing GP Practices are at or already over capacity in central Reading. The ICB, as a primary care commissioner, is currently working closely with our local GP providers and relevant stakeholders to identify a long-term solution to support the increasing demand on primary care services in Central Reading with the proposed housing growth. The ICB considers that there is an opportunity to deliver new primary healthcare facilities in Central Reading to support the increasing demand for primary healthcare services generated from the new housing growth in the area. This is important to ensure that primary care mitigation is agreed and provided in any forthcoming developments to ensure adequate capacity is provided to accommodate new patients generated from those new homes. Primary care mitigations can be provided through making a financial contribution towards primary care to support an identified project to expand or reconfigure the existing premises if they have the potential to do so or to provide a new onsite healthcare provision, where any onsite or offsite proposals must be discussed with the ICB at an early stage to ensure that the provision to be delivered is agreed and importantly is operationally and financially viable to the ICB.</i></p>	<p>Agree. No change required as these issues are all clearly addressed within other areas of the Local Plan and in detail with the accompanying Infrastructure Delivery Plan. Please also see above response with regard to OU1. It is considered that the supporting text of the introduction to this section is the appropriate place to highlight the important need to increase primary care provision.</p>
--------------------------------------	--	---

		Unless the Section is amended as suggested, the ICB would like to raise objection in this regard.	
Stantec on behalf of Aviva Life & Pensions UK Ltd	Section 5: Central Reading	<p>As a general point, Aviva wish to highlight that since the adoption of the previous Local Plan, Central Reading has seen a significant amount of development, and a number of further large-scale planning permissions have been issued. These have and will continue to change the context of the central area. However, the changing circumstances and current position has not been updated or incorporated into the LPPR. This has meant that the overall strategy for Area Strategy for Central Reading (set out at Figure 5.1) and within the subsequent policies has not been updated to reflect recent developments or recently permitted schemes. This is a missed opportunity, is potentially misleading, and means that the strategy is already out-of-date.</p> <p>Additionally, we note that there are a number of references in the LPPR to the Reading Station Area Framework (RSAF) adopted in December 2010. The status of this document remains unclear (particularly given the statement in Paragraph 1.1.3 of the LPPR). We therefore believe that the LPPR should confirm that the RSAF is rescinded and delete any references to it from the LLPR on the basis that it is 14 years old, out-of-date, and isn't representative of the position on the ground though built out schemes or those with planning permission.</p>	<p>Do not agree. The Local Plan Partial Update has been significantly amended throughout to account for changing circumstances. Although a significant amount of development has occurred within the central area, this is clearly aligned with the aims of the existing Local Plan and with proposals moving forward.</p> <p>The RSAF is not out of date. The relevance of paragraph 1.1.3 is not clear as the RSAF is an SPD. There is nothing in the Partial Update that renders the RSAF out of date, and it is a strategy that is part way through implementation,</p>
Historic England	CR2	Note typo: "prioritised" in the final sentence.	Change proposed.
Swifts Local Network: Swifts & Planning Group	CR2	Paragraph 5.3.10. of section 5 General Policies for Central Reading (page 158) is not sound as the reference to swift boxes rather than swift bricks is inconsistent with policy EN12 (c) and also with NPPG 2019 Natural Environment paragraph 023. Please amend paragraph 5.3.10. of section 5 General Policies for Central Reading (page 158) to refer to "swift bricks" rather than "swift boxes".	Change proposed.
Savills on behalf of John Lewis Partnership	CR6	<p>With reference to paragraph 35 of the NPPF 2023, Policy CR6 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy CR6 in order to ensure the soundness of the Plan.</p> <p>"...All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided based on an up-to-date assessment of local needs and site-specific circumstances. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-</p>	Do not agree. The proposed changes to the policy are based on an up-to-date assessment of local needs as illustrated in the Housing Needs Assessment. In any case, each site is considered on its own merits at such time that an application comes forward.

		bed/studios, and a minimum of 15% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable....”	
Savills on behalf of Viridis Real Estate	CR6	<p>With reference to paragraph 35 of the NPPF 2023, Policy CR6 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy CR6 in order to ensure the soundness of the Plan.</p> <p>“...All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided based on an up-to-date assessment of local needs and site-specific circumstances. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/studios, and a minimum of 15% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable....”</p>	Do not agree. The proposed changes to the policy are based on an up-to-date assessment of local needs as illustrated in the Housing Needs Assessment. In any case, each site is considered on its own merits at such time that an application comes forward.
Watkin Jones Group	CR6	<p>Part 1 of Draft Policy CR6 requires that all proposals for residential development within Central Reading provide at least 15% three-bed homes. Central Reading is likely to be the principle focus for BTR apartment developments, as demonstrated by the Thames Quarter scheme delivered by WJG. The housing mix within BTR schemes is different from other forms of homes (e.g. for sale) and the requirement for 15% three-bedroom homes is not consistent with the requirements of occupiers of BTR homes. This is evidenced by research by the British Property Federation (BPF) ‘Who Lives in BTR (2024)’ which analysed data from 32,000 renters living in BTR apartments.</p> <p>To reflect this difference and ensure that policy is effective in delivering rental homes in the borough, WJG recommends that Part i. of Policy CR6 is changed to state:</p> <p>“All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/studios, and a minimum of 15% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable, or where a BTR development is proposed as these typically have smaller unit sizes”.</p> <p>WJG recommends that Policy H4 is similarly amended to reflect the difference in housing mix in BTR developments.</p>	Do not agree. Much of the residential development that is proposed in the town centre is now build to rent and to exclude such developments from the mix targets would mean that delivering family housing in the town centre would be even more difficult. As demonstrated by the statistics provided, BTR is capable of delivering some family housing.

Watkin Jones Group	CR6	<p>The BPF's data demonstrates BTR apartments are typically occupied by the following:</p> <ul style="list-style-type: none"> • Single – 35% of occupiers • Couples/ sharers – 59% of occupiers • Families – 6% of occupiers • 75% of renters are under 34 years old. <p>This results in most apartments within BTR multi-family developments being studios or one-bedroom apartments (for single occupiers and couples) and two-bedroom apartments (for couples, sharers and small families). A small proportion of apartments (no more than 5%) are provided with three bedrooms for larger families. No four-bedroom apartments are provided.</p> <p>To reflect this difference and ensure that policy is effective in delivering rental homes in the borough, WJG recommends that Part i. of Policy CR6 is changed to state:</p> <p>“All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/studios, and a minimum of 15% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable, or where a BTR development is proposed as these typically have smaller unit sizes”.</p> <p>WJG recommends that Policy H4 is similarly amended to reflect the difference in housing mix in BTR developments.</p>	See above
Mark Drukker	CR9	<p>Questionable need for tall buildings. My former employers (in the IT industry) left Reading to other towns with easier car parking. Tall buildings are unsuitable for family housing - they tend to be used for occasional use by short-term workers from abroad.</p>	<p>Do not agree. Tall buildings in strategic locations are in line with national policy to increase densities around sustainable transport hubs. Flats provide an important element of the housing mix and the policies seek to</p>

			achieve a balance of different sized units for different types of residents.
Historic England	CR10	<p>We support the Council's efforts to determine where in Reading is more suitable, less suitable and unsuitable for tall buildings. We would be interested to see the evidence underpinning the areas of less suitability. Having introduced such areas, we take this opportunity to raise a proposal with the Council: the area north of King's Road is not an optimal area for tall buildings. In our detailed comments, we suggest recategorizing that subsection of the eastern cluster as an area of less suitability for tall buildings.</p>	<p>Noted. No change proposed. The evidence for the approach is within the original Tall Buildings Strategy and is explained in the Tall Buildings Strategy Update Note (2025). This considered that some areas north of Kings Road remain potentially suitable for tall buildings, although it is worth noting that the existing text relating to the Eastern Grouping makes clear that there are limits on the number that would be appropriate.</p>
Lichfields on behalf of USS Investment Management Limited	CR10	<p>Based on the analysis above, our client considers that the LPPU19 is unsound for the following key reasons:</p> <ul style="list-style-type: none"> • The proposed changes to Policy CR10 (Tall Buildings) in designating “areas of less suitability for tall buildings” remains unduly restrictive. It would not sufficiently promote the delivery of higher density development in the town centre, including brownfield sites with exceptional accessibility such as our client's sites at Aquis House (Policy CR14t) and 33 Blagrove Street (Policy CR14u). The plan is therefore not positively prepared as it does not provide a strategy, or therefore devise policies, which, as a minimum, seeks to meet the area's objectively assessed need. • This policy approach to ‘areas of less suitability for tall buildings’ is also inconsistent with the NPPF (December 2023) which seeks to make “as much use as possible of previously-developed or ‘brownfield’ land” (para. 123), “optimise the use of land in their area and meet as much of the identified need for housing as possible” (para. 129a) and requires that “significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes” (para. 109). The Plan is therefore not consistent with national policy and thus not considered sound. 	<p>Do not agree. The sites at CR14t and CR14u have been subject to a detailed assessment to determine suitability for tall buildings and more information can be found in the HELAA. Due to negative impacts on the surrounding area, particularly on the Conservation Area, a tall building would not be appropriate. The NPPF clearly allows for consideration of these impacts and seeks to strike a balance with optimizing the use of land and impacts on nearby heritage assets.</p>

		<ul style="list-style-type: none"> • RBC's proposed approach is also inconsistent with the LPPU19's objective to "Make the most efficient use of Reading's limited land, particularly previously developed land, to ensure that as many new homes as possible are delivered to meet identified needs, particularly needs for affordable housing" (LPPU19, para. 2.2.2). The LPPU19 does not propose an appropriate strategy, it is therefore not justified and thus not considered sound. <p>Policy CR10 should be updated to designate Aquis House (Policy CR14t) and 33 Blagrove Street (Policy CR14u) as part of a reworded policy for "areas of potential for tall buildings".</p>	
Mark Drukker	CR10	The railway station should not be surrounded by tall buildings. It is difficult to walk to the station entrances when the tall buildings magnify the wind. All bus routes should stop by the station.	Do not agree. Tall buildings in strategic locations are in line with national policy to increase densities around sustainable transport hubs. Applications for tall buildings are subject to assessment of wind impacts. Bus routes are not within the scope of the Local Plan.
Savills on behalf of John Lewis Partnership	CR10	<p>With reference to paragraph 35 of the NPPF 2023, Policy CR10 as currently drafted does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy CR10 in order to ensure the soundness of the Plan.</p> <p>'In Reading, tall buildings are defined as 10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres tall) or above. Tall buildings will meet all the requirements below.</p> <p>i) Within Reading Borough, tall buildings will only be appropriate within the 'areas of potential for tall buildings' as defined on the Proposals Map, other than as set out in criterion v). These areas are as follows: CR10a: Station Area Cluster CR10b: Western Grouping CR10c: Eastern Grouping...</p> <p>v) Outside of these identified clusters, but elsewhere within the defined town centre, In addition to the three clusters, 'areas of less suitability for tall buildings' are shown on the Proposals Map, within which tall buildings will not may be suitable unless where it can be demonstrated a clear case can be made that the cluster approach would not be</p>	

		<p>undermined when all significant views are taken into account and that all of the other aspects of this policy are complied with.</p> <p>vi) Outside the three clusters and the 'areas of less suitability for tall buildings', tall buildings will not be permitted....'</p>	
Savills on behalf of Viridis Real Estate	CR10	<p>With reference to paragraph 35 of the NPPF 2023, Policy CR10 as currently drafted does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy CR10 in order to ensure the soundness of the Plan.</p> <p>CR10: TALL BUILDINGS In Reading, tall buildings are defined as 10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres tall) or above. Tall buildings will meet all the requirements below.</p> <p>i) Within Reading Borough, tall buildings will only be appropriate within the 'areas of potential for tall buildings' as defined on the Proposals Map, other than as set out in criterion v). These areas are as follows: CR10a: Station Area Cluster CR10b: Western Grouping CR10c: Eastern Grouping</p> <p>v) Outside of these identified clusters, but elsewhere within the defined town centre, In addition to the three clusters, 'areas of less suitability for tall buildings' are shown on the Proposals Map, within which tall buildings will not may be suitable unless where it can be demonstrated a clear case can be made that the cluster approach would not be undermined when all significant views are taken into account and that all of the other aspects of this policy are complied with.</p> <p>vi) Outside the three clusters and the 'areas of less suitability for tall buildings', tall buildings will not be permitted.</p>	Do not agree. The evidence points towards parts of the town centre being inappropriate for tall buildings, and the cluster approach has been successfully implemented for a number of years.
DP9 Ltd on behalf of SH Reading Master LLP	CR11c	<p>We acknowledge that the Site Allocation CR11c, Station Hill & Friars Walk, has been updated to reflect the development specification for Phase 3. This is welcomed. The Site Allocation now refers to the overall indicative potential of 490-934 dwellings, 64,000-95,000 sq m of office space, and 3,900-5,900 sq m of retail and leisure space. These adjustments align with the evolving plans for Station Hill and we broadly support the updated Site Allocation as the figures are stated as being indicative only and not a cap on development that can be brought forward.</p>	<p>No change required.</p> <p>It is unclear how the allocation boundaries could be more defined on the proposals map than are currently.</p>

		We would request that the site allocation boundaries are made clearer with defined plans and maps.	
Savills on behalf of Elder	CR11	<p>We support the Council's continued allocation for the Station/River Opportunity Area as an area presenting significant potential for redevelopment centred around Reading Station for a mix of commercial and residential uses.</p> <p>In particular, the site lies within the Greyfriars Road Corner sub-area, covered by policy CR11b. It is noted that the indicative development potential has increased from 90-140 dwellings to 160-230 dwellings. We are supportive of the increase in development potential and acceptable density in this highly sustainable, town centre location.</p> <p>The current pending planning application proposes 266 co-living units, which according to the Government's ratio of 1.8 units in communal accommodation being equivalent to 1 traditional C3 unit, would equate to 147 C3 units. In March 2018, planning permission was granted for the redevelopment of 52-55 Friar Street for a mixed-use development comprising 135 dwellings under reference number 162210. Although this consent has now lapsed and not been implemented, the combination of the two permissions shows that the indicative development potential as set out within CR11b can be met and exceeded.</p>	Noted. No change required.
Stantec on behalf of Aviva Life & Pensions UK Ltd	CR11	<p>Aviva supports the continued allocation of the Reading Station Shopping Park for mixed use redevelopment (under Policy CR11e).</p> <p>However, as mentioned above and in the introduction section of this letter, there have been a number of development proposals that have received planning permission since the adoption of the current Local Plan (November 2019). This includes the grant of planning permission on the Reading Station Shopping Park at appeal by the Secretary of State in March 2024, and on other adjacent sites including the Royal Mail Sorting Office (80 Caversham Road) (LPA Ref: 182252) and the Scottish and Southern Energy Site (55 Vastern Road) (LPA Ref: 200188).</p> <p>Despite these permissions effectively making up the whole of the CR11e North Station Area none of the planning permissions are referenced and the only amendment to the applicable policy relates to an update of the indicative potential of the Site (to presumably reflect the permissions). However, this is insufficient, as the planning permissions have established the acceptability of alternative development schemes that would not be considered wholly in accordance with the policy as drafted.</p> <p>For example, the Council now propose the inclusion of the word 'Direct' in criterion ii) in relation to the north-south link through the area and specifically in Policy CR11e. This seeks to impose a more onerous position on the location and directness of the link despite the fact that the link has now been fixed by the planning permissions detailed above. Indeed, whilst the Council objected to the routing of the link in relation to both the 55</p>	<p>Do not agree.</p> <p>The proposed policy text does not alter the position in terms of what already has planning permission.</p> <p>The directness of the link between the station and river is a matter of critical policy importance. The appeals, particularly for 55 Vastern Road, highlighted that the existing policy text has a degree of scope for interpretation that was never intended. Should there be further applications on the site, the route sought should be direct.</p> <p>The policy does not require sites in different ownerships to be developed in parallel. This is recognised in paragraph 5.4.10.</p>

		<p>Vastern Road and Reading Station Retail Park appeals, both the Appeal Inspectors and the Secretary of State agreed that the routes proposed were justified and acceptable. This should be reflected in the Policy wording rather than the Council seeking to arbitrarily impose a more onerous position. The word 'Direct' should be deleted from the Policy at criterion 2 and within Policy CR11e.</p> <p>Further, the policy should explicitly acknowledge that there is potential to subdivide allocated sites. Whilst Reading Station Retail Park and the former Royal Mail site form part of the Policy CR11e allocation, they are in different ownerships, and as such it would be inappropriate to require these sites to be redeveloped in parallel. This is evidenced by the Council granting planning permission for the former Royal Mail site ahead of a permission being granted on the Reading Station Retail Park site.</p> <p>Policy CR11 (viii) already includes the requirement for developments to avoid preventing neighbouring sites from fulfilling the policy aspirations. We therefore suggest that the policy is amended to provide greater clarity, such that it is explicit that individual sites within an allocation, can come forward, provided they do not prevent neighbouring sites from fulfilling the aspirations of the policy. The policy should also make clear that the Reading Station Retail Park and the former Royal Mail sites can be delivered separately, while still satisfying the policy requirement for comprehensive development.</p>	
Turley on behalf of The Oracle Limited Partnership Group	CR11	The introduction of additional areas with potential for tall buildings is supported but consideration should be given to the terminology used in the policy to avoid misinterpretation.	It is unclear what is meant by this comment.
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	CR11, CR11d	<p>The ICB notes the proposed changes to Policy CR11 to include healthcare as one of the uses to be acceptable part of the mix and the proposed changes to the CR11d paragraph to include an onsite fitted-out primary healthcare facility. The ICB does not consider the CR11d site would be the preferred location for a new onsite healthcare facility. Instead, Developer contributions should be sought from all allocated sites in this Policy to co-fund the proposed healthcare facility in central Reading. The ICB has the following suggestions to Policy CR11:</p> <p><i>CR11: STATION/RIVER MAJOR OPPORTUNITY AREA (Strategic policy)</i></p> <p><i>Development in the Station/River Major Opportunity Area will:</i></p>	Do not agree. It is unclear why CR11d is not considered to be an appropriate site for a primary healthcare facility. Given the urgent need for GP premises in light of high levels of development, it is considered that ground floor primary care uses should be sought on various sites throughout the centre.

		<p>i) Contribute towards providing a high-density mix of uses to create a destination in itself and capitalise on its role as one of the most accessible locations in the south east. Development for education and healthcare will be an acceptable part of the mix.</p> <p>ii) Make financial contributions to co-fund the proposed primary healthcare provision in Central Reading or to support any identified estates projects within the existing GP practices in Central Reading to provide additional clinical capacity.</p> <p>CR11d, BRUNEL ARCADE AND APEX PLAZA</p> <p>This area will be developed for a mix of uses at high density, including residential and/or offices. Retail and/or leisure uses will activate the ground floor facing the southern station square. Development should seek to enhance the setting of nearby heritage assets, and views from within the conservation area and Forbury Gardens should be carefully considered. Development should deliver a fitted-out primary healthcare facility where this is viable and where there is a realistic prospect that an occupier to operate the facility can be found.</p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	
Historic England	CR11b	We recommend integrating reference to the Grade I church opposite this site, noting the potential for the site's development to affect this highly designated listed building.	Change proposed.
Network Rail	CR11d	Whilst the majority of the wording for the allocation is similar to what was previously suggested for the local plan, it is noted this now includes a primary healthcare facility as part of the development site. We are supportive of this allocation albeit with the healthcare facility being located on land not within Network Rail's ownership.	Noted. No change required.
Environment Agency	CR11e	<p>FZ2</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW).</p> <p>Currently the Reading STW require upgrades to accommodate further growth in Reading. Sequential test is required.</p> <p>This site is within FZ2 and more vulnerable development is included (residential). Flood Risk Standing Advice therefore applies, the exception test is not required, but the site should be included in Level 2 SFRA.</p>	<p>Noted.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>This site has been included in the Level 2 SFRA. A Water Quality Assessment has been produced.</p>

		A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.	
Environment Agency	CR11f	<p>FZ2</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW).</p> <p>Currently the Reading STW require upgrades to accommodate further growth in Reading. Sequential test is required.</p> <p>This site is within FZ2 and more vulnerable development is included (residential). Flood Risk Standing Advice therefore applies, the exception test is not required, but the site should be included in Level 2 SFRA.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Noted.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>This site has been included in the Level 2 SFRA. A Water Quality Assessment has been produced.</p>
Environment Agency	CR11g	<p>This site is within FZ3b where the Thames runs adjacent. The site is also within the design flood event (1% Annual exceedance probability (AEP)+ 35% climate change (CC)).</p> <p>Atlantic Salmon migratory route. Mitigation for impacts to the watercourse will be required. A proposed buffer zone with appropriate management plan will be required, as well as ensuring that buildings are not too high so there is minimal overshading and if sheet piling can be removed, it is. It is welcomed that development would be set back from the river, but it needs to be specified that it is an ecological buffer zone and be managed as such. The residential should not be too high to not over shade the river and any planting.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading</p> <p>Sequential test is required.</p> <p>A level 2 SFRA is required and the exception test must be passed before this site is allocated.</p> <p>The policy states that Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from the top of the bank of the</p>	<p>Noted. No change required.</p> <p>Noted. This migratory route, buffer zone and overshading is best considered under EN11 and EN12.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>This site has been included in the Level 2 SFRA.</p> <p>Noted. No change required.</p> <p>A Water Quality Assessment has been produced.</p>

		<p>river. Development should continue the high-quality direct route including green link from the north of the station to the Christchurch Bridge, with an area of pen space at the riverside. The main use of the site should be residential, although some small-scale leisure and complementary offices will also be acceptable. Development should take account of mitigation required as a result of a Flood Risk Assessment.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	
Environment Agency	CR11i	<p>Site is within FZ3a and the 1% AEP + 35% climate change extent</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required. A level 2 SFRA is required and the exception test must be passed before this site is allocated.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Noted.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>A sequential test and exception test has been completed and this site has been subject to Level 2 SFRA.</p> <p>A Water Quality Assessment has been produced.</p>
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	CR12, CR12a	<p>The ICB welcomes the proposed changes to Policy CR12 to include healthcare as one of the uses to be acceptable part of the mix. As a primary care commissioner, the ICB has the delegated responsibility to ensure any proposed healthcare provision must be operationally and financially viable. The ICB considers that Policy CR12 should make a reference to the ICB's suggested policy OU1A in this regard.</p> <p>The ICB notes the proposed changes to the CR12a paragraph to include an onsite fitted-out primary healthcare facility. The ICB welcomes the proposed changes as it will ensure that this opportunity area will have the opportunity to provide an onsite fitted-out primary healthcare facility in Central Reading. Instead of referencing to CR12a Cattle Market site, the ICB considers that this wording should be within the main text of Policy CR12. The exact location of the fitted out primary healthcare facility will need to be discussed with the Council and the developers. There is also an opportunity to allow all identified allocated sites within this opportunity area to co-fund this fitted-out primary healthcare facility. The ICB has the following suggestions to Policy CR12:</p>	<p>Noted. No change required. Please see responses above with regard to OU1A.</p> <p>Do not agree. It is considered that identifying a specific site is a more effective approach. Moreover, the main text of CR12 also references healthcare uses. Any co-funding of a healthcare facility is best addressed through CC9.</p>

		<p><i>CR12: WEST SIDE MAJOR OPPORTUNITY AREA (Strategic policy)</i></p> <p><i>Development in the West Side Major Opportunity Area will:</i></p> <p><i>i) Contribute towards providing a mix of uses including residential. Development for education and healthcare will be an acceptable part of the mix;</i></p> <p><i>ii) Provide a fitted-out primary healthcare facility where this is operationally and financially viable or make financial contributions to co-fund the proposed primary healthcare provision in Central Reading or to support any identified estates projects within the existing GP practices in Central Reading to provide additional clinical capacity.</i></p> <p><i>CR12a, CATTLE MARKET</i></p> <p><i>This site will be developed for primarily residential development, It must be designed to reflect the urban grid layout and built form of the centre. Development should take account of mitigation required as a result of a Flood Risk Assessment. Development should include the delivery of a fitted-out primary healthcare facility where this is operationally and financially viable and where there is a realistic prospect that an occupier to operate the facility can be found. Where the onsite provision of a facility in accordance with this policy is not viable, developers are expected to make financial contributions to co-fund the proposed primary healthcare provision in Central Reading.</i></p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	
Environment Agency	CR12a	<p>Site is within FZ2 and the 1% AEP + 35% CC predominately in the east.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>This site is within FZ2 and more vulnerable development is included (residential). Flood Risk Standing Advice therefore applies, the exception test is not required, but the site should be included in Level 2 SFRA.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Noted.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>A sequential test has been completed.</p> <p>This site has been subject to Level 2 SFRA.</p> <p>A Water Quality Assessment has been produced.</p>

Environment Agency	CR12b	<p>Site is within FZ2 and the 1% AEP + 35% CC extent</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>Whilst Flood Risk Standing Advice is applicable to more vulnerable development in FZ2, we note there is no mention of flood risk in this policy in the Local Plan. This must be considered for development on this site. This site is within FZ2 and more vulnerable development is included (residential). Flood Risk Standing Advice therefore applies, the exception test is not required, but the site should be included in Level 2 SFRA.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Noted.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>A sequential test has been completed.</p> <p>This site has been subject to Level 2 SFRA.</p> <p>A Water Quality Assessment has been produced.</p>
Historic England	CR12d	Reference should be made to the (many) heritage assets nearby, including the Grade I Church of St. Mary. We recommend wording for consideration.	No change proposed. It is not clear what additional benefit this would provide as the presence of the Church would be best addressed under heritage policies, particularly EN1 and EN6.
Historic England	CR12e	Reference should be made to the (many) heritage assets nearby, including the Grade I Church of St. Mary. We recommend wording for consideration.	No change proposed. It is not clear what additional benefit this would provide as the presence of the Church would be best addressed under heritage policies, particularly EN1 and EN6.
Mr Tom Clarke MRTPI, Theatres Trust	CR12e	<p>We support revision to this policy reflecting investment into the expansion of the Hexagon, and removing potential for the venue's loss.</p> <p>We welcome that this allocation directs retention of servicing access and parking for the Rep, and also includes the need to address noise impacts on residential use. It is essential new homes on the site are sensitively located and designed so as not compromise the theatre's future operations, and to provide acceptable living standards for</p>	Noted. No change required.

		future occupants. This will ensure compliance with the principles of 'agent of change' set out in paragraph 200 of the NPPF (2024).	
Historic England	CR13	<p>Para 5.4.28</p> <p>Given the sensitivity of the site, we recommend the local plan explicitly refers to proportionate heritage impact assessment, which provides the mechanism through which proposals can be considered.</p>	No change proposed. It is not clear what additional benefit this would provide as a heritage impact assessment would be required by policy EN1.
Historic England	CR13	<p>Criterion v would benefit from several minor amendments:</p> <ul style="list-style-type: none"> referring to the assets' significance (rather than risk focusing solely on their fabric), referring to a Scheduled Monument (rather than scheduled ancient monument) to align with the NPPF; also, we assert adding "Reading Abbey" could be a helpful identifier, connecting its multiple sites in the area; and Forbury Registered Park and Garden to acknowledge that it is on the national Register. 	<p>Partially agree. Change proposed to refer to Scheduled Monument. It is considered that an asset's significance, as well as Reading Abbey is sufficiently addressed by EN1 and CR15.</p> <p>It is not considered necessary to acknowledge that Forbury Garden is on the national register.</p>
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	CR13, CR13b, CR13c	<p>The ICB welcomes the proposed changes to Policy CR13 to include healthcare as one of the uses to be acceptable part of the mix. As a primary care commissioner, the ICB has the delegated responsibility to ensure any proposed healthcare provision must be operationally and financially viable. The ICB considers that Policy CR13 should make a reference to the ICB's suggested policy OU1A in this regard.</p> <p>The ICB notes the proposed changes to the CR13c paragraph to include an onsite fitted-out primary healthcare facility. The ICB welcomes the proposed changes as it will ensure that this opportunity area will have the opportunity to provide an onsite fitted-out primary healthcare facility in Central Reading. Instead of referencing to CR13c Kenavon Drive & Forbury Business Park site, the ICB considers that this wording should be within the main text of Policy CR13. The ICB is still working with our GP providers to confirm the location of the fitted-out primary healthcare facility. There is also an opportunity to allow all identified allocated sites within this opportunity area to co-fund this fitted-out primary healthcare facility. The ICB has the following suggestions to Policy CR13:</p> <p><i>CR13: EAST SIDE MAJOR OPPORTUNITY AREA (Strategic policy)</i></p> <p><i>Development in the East Side Major Opportunity Area will:</i></p>	<p>Noted. No change required. Please see responses above with regard to OU1A.</p> <p>Do not agree. It is considered that identifying a specific site is a more effective approach. Moreover, the main text of CR13 also references healthcare uses. Any co-funding of a healthcare facility is best addressed through CC9.</p>

		<p><i>i) Contribute towards the provision of a new residential community at the eastern fringes of the central area. Development for education and healthcare will be acceptable within the site;</i></p> <p><i>ii) Provide a fitted-out primary healthcare facility where this is operationally and financially viable or make financial contributions to co-fund the proposed primary healthcare provision in Central Reading or to support any identified estates projects within the existing GP practices in Central Reading to provide additional clinical capacity.</i></p> <p>CR13b, FORBURY RETAIL PARK</p> <p><i>Development should include the delivery of a fitted-out primary healthcare facility where this is operationally and financially viable and where there is a realistic prospect that an occupier to operate the facility can be found. Where the onsite provision of a facility in accordance with this policy is not viable, developers are expected to make financial contributions to co-fund the proposed primary healthcare provision in Central Reading.</i></p> <p>CR13c, KENAVON DRIVE & FORBURY BUSINESS PARK</p> <p><i>This site would be residential in nature, although opportunities to create an area of open space close to the Kennet should be sought. Development will link into the existing pedestrian link under the railway to Napier Road. Development should include the delivery of a fitted-out primary healthcare facility where this is operationally and financially viable and where there is a realistic prospect that an occupier to operate the facility can be found. Where the onsite provision of a facility in accordance with this policy is not viable, developers are expected to make financial contributions to co-fund the proposed primary healthcare provision in Central Reading.</i></p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	
Canal & River Trust	CR13, CR14	The Trust have reviewed the document/policies contained within the document and based on the information available we wish to advise that the Kennet & Avon Canal is misnamed in many sections of the document by the use of 'and'. Please amend to Kennet & Avon Canal.	Change proposed.
Historic England	CR13a	We welcome the heritage-led approach being taken by the Council and encourage the Council to consider requiring a heritage-led development brief for the site. Our main outstanding concern relates to what 10,000m2 of mixed use means in practice in terms of massing, form and density. Without a clear idea of what this means, we cannot be confident in what will be achieved, including the Council's heritage aspirations. Within our comments, we recommend the policy requires early engagement with Historic England.	Noted. Detailed proposals will be assessed at application stage and subject to close scrutiny as required by EN1 and other heritage policies. It is considered that the policy as worded

			already highlights the importance of heritage at the earliest stage.
Historic England	CR13a	In CR13a, we recommend referring to Reading Abbey Scheduled Monument, rather than a scheduled ancient monument. This roots the wording in the local context and connects with the NPPF terminology.	Change proposed.
Savills on behalf of Viridis Real Estate	CR13c	<p>With reference to paragraph 35 of the NPPF 2023, the following changes are recommended to Policy CR14 in order to ensure the Plan meets the tests of soundness.</p> <p>CR13c: KENAVON DRIVE & FORBURY BUSINESS PARK</p> <p>This site would be largely residential in nature, although opportunities to create an area of open space close to the Kennet should be sought. Development will link into the existing pedestrian link under the railway to Napier Road. Development should deliver a fitted-out primary healthcare facility where this is viable and where there is a realistic prospect that an occupier to operate the facility can be found.</p> <p>Site size: 2.07 ha</p> <p>Indicative potential: 320-490 450 – 540 dwellings primary healthcare</p>	Do not agree. No change proposed. The dwelling range specified (320 – 490) is considered to be appropriate based on detailed analysis of constraints outlined in detail in the HELAA. It is also considered that delivery of a primary healthcare facility where viable is required to ensure infrastructure is provided to enable the level of development within the town centre. This is further outlined in CC9.
Environment Agency	CR13d	<p>River Kennet main river adjacent.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>Any increase in built footprint must be able to be compensated. Level 2 SFRA required.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Importance of the Kennet is highlighted in the text of the policy.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>A sequential test has been completed.</p> <p>This site has been included in the Level 2 SFRA.</p> <p>A Water Quality Assessment has been produced.</p>
Historic England	CR14	<p>Para 5.4.37</p> <p>We recommend expanding the opening of paragraph 5.3.37 as suggested.</p> <p>“It is vital that, given their prominence and the potential for them to impact on the setting of heritage assets, new tall buildings are of the highest architectural quality...”</p>	Agree that new tall buildings must be of the highest architectural policy, but a change is not required. This is best addressed by other policies, including CC7, CR2, EN1 and EN5.

<p>NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board</p>	<p>CR14</p>	<p>The ICB would like to reinstate our comments in the previous Regulation 18 consultation that the ICB has no particular concern about the proposed changes to some of the sites to reflect the latest developments but considers that new population generated from those identified sites will inevitably have additional pressure to the existing primary healthcare provision.</p> <p>Any residential developments identified in this Policy are expected to make financial contributions to either co-fund the proposed healthcare facility in Central Reading or to support any estates projects within the existing GP practices in Central Reading to provide additional clinical capacity. Relevant wording should be included in the Policy. The ICB also points out in the previous Regulation 18 consultation that the proposed wording related to community use provision. Given the complexity of how primary healthcare is funded and operates, if the Council is mindful to consider primary healthcare provision is one of the potential community uses in some of the sites, relevant wording should be included in the Policy to ensure that developers engage with the ICB at an early stage to ensure any provision is financially and operationally viable and deliverable.</p> <p>The ICB has the following suggestions to Policy CR14:</p> <p>CR14: OTHER SITES FOR DEVELOPMENT IN CENTRAL READING</p> <p><i>The following sites will be developed according with the principles set out in this policy:</i></p> <p><i>All allocated sites within this Policy are expected to make financial contributions to co-fund the proposed primary healthcare provision in Central Reading or to support any identified estates projects within the existing GP practices in Central Reading to provide additional clinical capacity.</i></p> <p><i>Developers must engage with NHS Buckinghamshire, Oxfordshire, and Berkshire Integrated Care Board (BOB-ICB) or such appropriate body at an early stage if it is intending to include primary healthcare as one of the potential community uses of the site. Developers are expected to carry out a pre-project work at their own expenses to work out the detailed specification of the provision. Any onsite provision must refer to Policy OU1A of this document. Subject to the agreement with BOB-ICB, any primary care mitigations including but not limited to an onsite provision or an offsite mitigation, will be secured through planning obligations.</i></p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	<p>Noted. Alongside meeting the urgent need for new and affordable housing in the area, the Local Plan seeks to ensure that the appropriate infrastructure is provided to meet the needs of new residents, particularly in the town centre.</p> <p>Noted, but it is not considered necessary to re-state this within the policy itself as this is best addressed by CC9 and OU1.</p> <p>Please see response above with regard to recommended policy OU1A.</p>
--	-------------	---	---

Environment Agency	CR14aa	<p>Superficial Secondary A aquifer and Bedrock Principal aquifer. Desk study at a minimum required here owing to location and because of the aquifer designation. Shallow depths to groundwater are a possibility which will need to be carefully considered.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>The policy current does not mention addressing contamination.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Partially agreed. Change proposed to refer to the aquifers.</p> <p>The Council's records do not indicate any identified contaminated land issue on this site.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Thames Water	CR14aa	<p>Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s</p>	<p>Noted. No changes proposed.</p>
Historic England	CR14ab	<p>The site is sensitive from a heritage perspective, especially noting its proximity to the Town Hall (Grade II*). This should be acknowledged in policy.</p>	<p>It is not considered necessary to cite specific heritage assets. This is best addressed by EN1.</p>
Thames Water	CR14ab	<p>Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination</p>	<p>Noted. No changes proposed.</p>

		for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	
Historic England	CR14d	We recommend a slightly revised formulation of wording that more explicitly picks up the need to consider listed buildings (plural) within the site and also nearby buildings (which include the Grade I Church of St Laurence).	It is not considered necessary to cite specific heritage assets. This is best addressed by EN1.
Environment Agency	CR14g	<p>Site is within FZ3b as the River Kennet main river runs through it.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>Site is within FZ3b as the River Kennet runs through it. While this appears to be restricted to the river channel, a Level 2 SFRA is required and any development must pass the exception test.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Noted.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>Sequential test has been completed.</p> <p>This site has been included in the Level 2 SFRA.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Historic England	CR14g	We recommend referring to “harm” rather than “detrimental effects” to align with the terminology in the NPPF.	Change proposed.
Turley on behalf of The Oracle Limited Partnership Group	CR14g	<p>The proposed site allocation CR14g is considered to provide a fantastic opportunity to support the sustainable growth of central Reading. The allocation reflects the current direction of development on this site at the Oracle and the Partnership’s commitment to delivering transformational change at the eastern end of the Oracle. This representation confirms that in accordance with the NPPF the Site is deliverable, being suitable, available and achievable for allocation in the emerging Local Plan Update.</p> <p>It is requested that amendments are made to the policy wording to ensure the site’s full potential is realised in terms of site capacity and mix of uses, as well as ensuring that the allocation boundary accurately reflects site ownership. Amendments should be made to increase the development capacity of the site to 440 and recognise the appropriateness of footfall generating town centre uses as part of any redevelopment proposals.</p>	<p>Noted.</p> <p>No change proposed. The indicative dwelling range (250-370) has been determined by detailed analysis of constraints through the HELAA. Specific proposals can be considered at application stage. The policy clearly recognises the potential of retail or leisure uses on the ground floor.</p> <p>The Council would be content with a change to the boundary to reflect the red line boundary of the application</p>

			site, much of which is made up of the highway and adjoining public realm. However it is considered that this would represent a main modification.
Historic England	CR14i	We advise a slightly revised formulation of wording that more explicitly picks up the need to consider listed buildings (plural) within the site and also nearby buildings. We recommend referring to “harm” rather than “detrimental effects” to align with the terminology in the NPPF.	Changes proposed.
Historic England	CR14l	We recommend referring to “harm” rather than “detrimental effects” to align with the terminology in the NPPF. Also, we recommend referring to listed buildings plural, noting the potential to affect the setting of nearby listed buildings.	Changes proposed.
Environment Agency	CR14m	<p>Site is within FZ3b and the River Thames runs adjacent on all sides of the site.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>Development is proposed to be water-compatible leisure. A Level 2 SFRA is required and the exception test must be passed.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Noted.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>Sequential test has been completed.</p> <p>This site has been included in the Level 2 SFRA.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Environment Agency	CR14n	<p>Site is within FZ3b where the Holy Brook Main River runs under the site.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>Residential development is proposed which is an increase in vulnerability from the current less vulnerable state (library). This would be a policy objection as more vulnerable development in FZ3b is inappropriate, and increasing vulnerability on a developed site in FZ3b is also grounds for in-principle objection. The draft policy states they will avoid</p>	<p>Noted.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>Sequential test has been completed. Only a very proportion (less than 5%) of the site is within Flood Zone 3b or Flood Zone 3 and this consists of the</p>

		<p>development in FZ3. This should be demonstrated in a Level 2 SFRA and the development must pass the exception test before the site is allocated.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>actual Holy Brook that runs through the site and would not be subject to any development. On this basis the Council applied the sequential test and did not consider that the exception test is required.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Historic England	CR14n	<p>We assert that the policy is unsound because it appears to rely solely on archaeological investigation as a way to avoid harm to the Scheduled Monument. This is unlikely to be effective, because it omits reference to archaeological desk-based assessment, and fails to connect with the potentially positive role of development in heritage terms. Rather than simply aiming to avoid harm, this is the opportunity to set out a positive strategy for the conservation and enjoyment of the historic environment, as required by the NPPF.</p> <p>We recommend reference to heritage impact assessment as the mechanism through which place-shaping can most effectively be delivered. This site provides a rare opportunity for enhancement, with the potential to foster greater appreciation of the Holy Brook, the Abbey Quarter (which currently it turns its back on) and any archaeological remains associated with the Abbey. This needs careful handling, which the current policy does not fully articulate. We suggest revised wording for consideration, including reinforcing the need for Scheduled Monument Consent and the need for early engagement with Historic England.</p> <p>To better align with the NPPF, we advise referring to a Scheduled Monument, rather than a scheduled ancient monument, and “harm” rather than “detrimental effects.”</p>	<p>Partially agreed. Change proposed. The reference to archaeological investigation should be deleted.</p> <p>However, in general, it is considered that the site allocation criteria is not the right place to provide detail on the approach to archaeology in this location. Therefore, a more general reference should be included and reference instead made to policy EN2.</p>
Thames Water	CR14n	<p>Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.</p>	<p>Noted. No change required.</p>

Thames Water	CR14o	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided modelling may be required to understand the impact of development	Noted. No change required.
Thames Water	CR14p	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Noted. No change required.
Thames Water	CR14q	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Noted. No change required.
Historic England	CR14r	We recommend referring to “harm” rather than “detrimental effects” to align with the terminology in the NPPF.	Change proposed.
Savills on behalf of John Lewis Partnership	CR14r	With reference to paragraph 35 of the NPPF 2023, the following changes are recommended to Policy CR14 in order to ensure the Plan meets the tests of soundness. CR14: OTHER SITES FOR DEVELOPMENT IN CENTRAL READING	

		<p>The following sites will be developed according with the principles set out in this policy:</p> <p>CR14r JOHN LEWIS DEPOT, MILL LANE Development for residential and flexible community / commercial use</p> <p>Development should:</p> <ul style="list-style-type: none"> • Avoid detrimental effects on the setting of listed buildings and the Conservation Area; • Take account of potential archaeological significance; • Address noise impacts on residential use; • Address air quality impacts on residential use; and • Address any contamination on site. <p>Site size: 0.37 0.44 ha 76-110 200-215 dwellings...</p>	<p>It is unclear how 0.44 ha has been determined, as our records calculate the allocated site to be 0.37 ha.</p> <p>The inclusion of community uses within a residential development is recognised for all sites within paragraph 5.4.36, but a specific need on this site has not been identified and does not therefore form a requirement.</p> <p>The site has been assessed as suitable for the range proposed through the HELAA.</p>
Thames Water	CR14r	<p>Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided modelling may be required to understand the impact of development.</p>	Noted. No change required.
Environment Agency	CR14s	<p>Site is partly within FZ3b. There is no mention of flood risk in this Local Plan policy.</p> <p>River Kennet main river adjacent</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>A Level 2 SFRA is required, and development must pass the exception test.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Change proposed to reference flood risk.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>Sequential test has been completed.</p> <p>This site has been included in the Level 2 SFRA.</p>

			The Water Quality Assessment forms part of the submission background evidence.
Historic England	CR14s	We recommend referring to avoiding or minimising “harm” rather than preventing “detrimental effects” to align with the terminology in the NPPF. To better align with the NPPF, reference should be made to a Scheduled Monument, rather than a scheduled ancient monument.	Changes proposed.
Martin Robeson Planning Practice on behalf of Samuel Smith Old Brewery	CR14s	<p>The draft Plan is clear that there is, and will continue to be, an acute need for new housing within the Borough, and that owing to the nature of the Borough, brownfield land will need to be identified and optimised to deliver as much housing as possible to meet this need. This is reflective of the direction of travel in national planning policy. For this reason the allocation of 20-22 Duke Street for residential development is strongly supported.</p> <p>However in light of the above, it is considered that the allocation set out at draft Policy CR14s relating to the site at 20-22 Duke Street would fail to optimise the site’s opportunity and would thus not be positively prepared. Policy CR14s sets out that the site would be capable of accommodating 12-18 dwellings.</p> <p>This figure appears to have been derived through the HELAA process with the blanket application of an ‘urban density’ of 112 dwellings per hectare (dph). Policy H2, however, sets out a minimum density for residential development within the Town Centre of 260dph, and no justification has been provided so as to explain the substantial reduction from this figure.</p> <p>Further, the HELAA appears to have further reduced the site area and thus the total capacity through the assumption that a 10m buffer to the river would be applied. Matters of this specificity would be dealt with at application stage, and such assumptions should not be applied to cap the amount of development that can be delivered on this site through the allocation.</p> <p>It is therefore considered that the site capacity set out within the Policy’s text should be substantially increased to reflect the capability of the site to accommodate up to 30 dwellings.</p> <p>Further, Figure 10.1 denotes that CR14s would be delivered in the ‘medium term’ (2028-33). The site would not suffer from any significant planning, legal or ownership constraints, and would thus be capable of delivering homes within the early part of the plan period.</p>	<p>Noted. No change required.</p> <p>The plan is clear that, as for other sites, the figures are an indicative capacity for monitoring purposes and that a different capacity may be justified.</p> <p>Although in the ‘development potential’ stage of the HELAA a redevelopment pattern book approach is used, at the suitability stage the figure is adjusted to assume a conversion of the existing building plus an extension and adjusted upwards. It is considered that the existing building which contributes to the character of the conservation area should be retained and therefore a redevelopment at simple town centre densities is not appropriated.</p> <p>Matters of specificity such as the 10m buffer are entirely relevant to the capacity of the site and, given that they are a policy requirement, were they not taken into account, there would no doubt be criticism of the approach. Once again, these matters can be reconsidered at application stage as is normal practice.</p>

		<p>Finally, the criteria within the Policy relating to the scheduled ancient monument and heritage assets should be amended so as to align with the development management tests for assessing any harms that may arise. I.e. the criteria should reference “unacceptable impact” (our emphasis) as the assessment criteria for compliance with the allocation. This would ensure that the allocation remains deliverable but that any impacts are fully assessed and taken into account in the assessment of a planning application on the site.</p>	<p>It is noted that there is no planning application on the site yet, and full delivery in the short term cannot be assumed at this stage.</p> <p>The main policy approach for dealing with the heritage assets is set out in EN1 to EN6. Where existing policy applies, the purpose of these criteria is to flag these issues for ease of reference. Trying to make all of these criteria fully reflective of the wording of national and local policy would substantially lengthen the plan.</p>
Thames Water	CR14s	<p>Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s</p>	Noted. No change required.
behalf of USS Investment Management Limited	CR14t	<p>Based on the analysis above, our client considers that the LPPU19 is unsound for the following key reasons:</p> <ul style="list-style-type: none"> • The modest quantum of development proposed for Aquis House (Policy CR14t) would impede the delivery of higher density development at an exceptionally accessible brownfield site. This would be misaligned with the NPPF (December 2023) which seeks to make “effective use of land” (para. 8c), make “as much use as possible of previously-developed or ‘brownfield’ land” (para. 123), “optimise the use of land in their area and meet as much of the identified need for housing as possible” (para. 129a) and the NPPF’s (December 2023) requirement that “significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and 	<p>Do not agree. The evidence for the approach in relation to this site is set out in the HELAA, and this has resulted in an approximate capacity figure. The full reasoning for the approach is in the HELAA document. However, there are limitations to this approach which is why the range is framed as an indicative range, with scope to justify an alternative figure at application stage.</p>

		<p>offering a genuine choice of transport modes” (para. 109). The Plan is therefore inconsistent with national policy and thus not considered sound.</p> <ul style="list-style-type: none"> • Additionally, the modest quantum of development envisaged for Aquis House within Policy CR14t is misaligned with Policy CR10, which recognises the potential of Aquis House (Policy CR14t) to accommodate tall building(s) and thus greater quantum of development. The misalignment represents a failure of the Plan to propose an appropriate strategy. The Plan therefore is not justified and thus not considered sound. • The conclusion in the SA that there are less positive sustainability effects for the Option 14t(i) (i.e. Tall Building Option) than Option 14t (iii) (i.e. Non-Tall Building Option) is undermined by RBC not considering the potential for the redevelopment proposals of Aquis House (Policy CR14t) to address the purported tendency for negative effect with regard to landscape/townscape (if any). The proposed strategy in the LPPU19 for Aquis House (Policy CR14t) is based on inadequate evidence. The Plan does not propose an appropriate strategy and is not based on proportionate evidence, on this basis it is not justified and thus not considered sound. <p>Policy CR14t (Aquis House) should be updated to substantially increase the proposed quantum of development of the site including through the provision of tall building(s).</p> <p>Flexibility should be introduced to the policy to allow for residential-led or mixed-use development comprising residential and offices to enable proposals to reflect the prevailing market context.</p>	
Historic England	CR14t	We recommend referring to “harm” rather than “detrimental effects” to align with the terminology in the NPPF.	Change proposed.
Thames Water	CR14t	<p>Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided modelling may be required to understand the impact of development.</p>	Noted. No change required.

behalf of USS Investment Management Limited	CR14u	<p>Based on the analysis above, our client considers that the LPPU19 is unsound for the following key reasons:</p> <ul style="list-style-type: none"> • The modest quantum of development proposed for 33 Blagrove Street (Policy CR14u) would impede the delivery of higher density development at an exceptionally accessible brownfield site. This is misaligned with the NPPF (December 2023) which seeks to make “effective use of land” (para. 8c), make “as much use as possible of previously-developed or ‘brownfield’ land” (para. 123), “optimise the use of land in their area and meet as much of the identified need for housing as possible” (para. 129a) and the NPPF (December 2023) requirement that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes” (para. 109). The Plan is therefore not consistent with national policy and thus not considered sound. The LPPU19 does not propose an appropriate strategy, it is therefore not justified and thus not considered sound. • The conclusion in the SA that there is less positive sustainability effects for the Option 14u (i) (i.e. Tall Building Option) than Option 14u (iv) (i.e. Conversion Option) is unsubstantiated. The proposed strategy in the LPPU19 for 33 Blagrove Street (Policy CR14u) is based on inadequate evidence. The Plan does not propose an appropriate strategy and is not based on proportionate evidence, on this basis it is not justified and thus not considered sound. <p>Policy CR14u (33 Blagrove Street) needs to be updated to substantially increase the proposed quantum of development of the site including through the provision of tall building(s).</p>	<p>Do not agree. The evidence for the approach in relation to this site is set out in the HELAA, and this has resulted in an approximate capacity figure. However, there are limitations to this approach which is why the range is framed as an indicative range, with scope to justify an alternative figure at application stage.</p> <p>It is worth noting that this site is heavily constrained by its location within the Market Place/London Street conservation area, which will limit the development capacity of the site.</p>
Historic England	CR14u	<p>We encourage the Council to be more demanding and clearer in the design contribution that this site should make to the conservation area, using the language used in policy EN3. Reference should be made to the nearby Town Hall (Grade II*).</p>	<p>It is unclear what additional benefit this would bring, as it is best addressed by EN3 itself. It is not considered necessary to refer to specific heritage assets.</p>
Thames Water	CR14u	<p>Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan</p>	<p>No changes required.</p>

		includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s	
Environment Agency	CR14v	<p>Site is within FZ3a and River Thames adjacent.</p> <p>Atlantic Salmon and European Eel migratory route. Mitigation for impacts to the watercourse will be required. A proposed buffer zone with appropriate management plan will be required, as well as ensuring that buildings are not too high so there is minimal overshading and if sheet piling can be removed, it is. The policy states that Development should: Avoid a detrimental impact on, and where possible enhance, the biodiversity value of the River Thames, and set buildings back at least ten metres from the top of the bank of the river. It should be specified that this must be an ecological buffer zone.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>Level 2 SFRA is required and the exception test must be passed before the site can be allocated.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Noted. This is stated in the policy itself.</p> <p>The migratory route, buffer and consideration of shading is best addressed under EN11 and EN12.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>Sequential test has been completed.</p> <p>This site has been included in the Level 2 SFRA.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Environment Agency	CR14v	<p>River Kennet main river running adjacent.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>This site is in FZ1 but has main river running adjacent. A minimum 10m buffer zone would need to be incorporated into any built development on these sites, which is not clearly stated in the Local Plan policy.</p>	<p>Noted. No change required.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>No change required. The need for a 10m buffer is stated within policy EN11.</p>

		A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.	The Water Quality Assessment forms part of the submission background evidence.
Thames Water	CR14v	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s, STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided modelling may be required to understand the impact of development.	No changes required.
Environment Agency	CR14w	<p>Site is within FZ3b where River Thames runs adjacent.</p> <p>Atlantic Salmon and European Eel migratory route. Mitigation for impacts to the watercourse will be required. A proposed buffer zone with appropriate management plan will be required, as well as ensuring that buildings are not too high so there is minimal overshading and if sheet piling can be removed, it is. The policy states that Development should: Avoid a detrimental impact on, and where possible enhance, the biodiversity value of the River Thames, and set buildings back at least ten metres from the top of the bank of the river. It should be specified that this must be an ecological buffer zone.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>Level 2 SFRA is required and the exception test must be passed before the site can be allocated.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Noted. No change required.</p> <p>The migratory route, buffer and consideration of shading is best addressed under EN11 and EN12.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>Sequential test has been completed.</p> <p>This site has been included in the Level 2 SFRA.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Thames Water	CR14w	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames	No changes required.

		<p>Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided modelling may be required to understand the impact of development.</p>	
Environment Agency	CR14x	<p>Site entirely in FZ2 and almost entirely within the 1% AEP + 35% CC extent.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>There is no current built footprint (currently car parking) and this is a proposed residential development so any increase in built footprint would unlikely be able to be compensated on site, i.e., level for level. It would therefore be difficult for a development to pass the exception test or comply with the NPPF which presents a soundness issue if this site is allocated.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Noted. No change required.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>Sequential test has been completed.</p> <p>The site has been subject to Level 2 SFRA which confirms that a residential development is possible but makes a number of recommendations. The exception test is not required as the site is in Flood Zone 2.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Martin Robeson Planning Practice on behalf of Tesco Stores Ltd	CR14x	<p>While the site's proposed allocation for residential development is supported, it is considered that the seemingly reduced site capacity of 57-85 dwellings would fail to optimise the site's opportunity, and has not been satisfactorily justified.</p> <p>The site itself is an area of surplus car parking land identified by our client, which forms part of Reading's Central Area, and is located approximately a 10 minute walk from the town centre via the Napier Road underpass.</p> <p>..while it is recognised that the Borough's boundaries are such that it is challenging to identify greenfield land for development, this does not justify the Council's reduction of the Local Plan's housing targets so substantially below its Objectively Assessed Need of</p>	<p>Noted. The evidence for the approach in relation to this site is set out in the HELAA, and this has resulted in an approximate capacity figure. However, there are limitations to this approach which is why the range is framed as an indicative range, with scope to justify an alternative figure at application stage. It is not a cap or a maximum.</p>

	<p>1,028 dwellings per year. Rather, this situation highlights the necessity of maximising the density on suitable brownfield sites, of which Napier Road / CR14x is one.</p> <p>Despite the site's relative lack of constraints and central location, the proposed allocation would promote the site for the delivery of only 57-85 dwellings. With the site allocation being approximately 0.88ha in size, this would result in a site density of 65-97 dwellings per hectare (dph). While it is noted that the HELAA (November 2024) reduced the site size to reflect the areas protected by TPO and the adjacent priority habitat, this site is evidently not a typical "urban residential new-build" site whereby a typical 112dph figure (set out within the HELAA's methodology) can be applied across the remainder of the site. The site's reasonable density for development is substantially higher.</p> <p>The site is adjacent to the town centre, is presently under-utilised brownfield land, and is accessibly located via the Napier Road underpass (noting that improvement of this route is identified within the Area Strategy for Central Reading (Figure 5.1 of the draft Plan). For the draft allocation to therefore cap the residential density at 97dph, below the proposed minimum density for urban area sites set out in Policy H2, and far below the minimum density of 260dph for town centre sites, would therefore not be appropriate. The site was promoted on the basis of delivering approximately 150 dwellings at previous stages of the Local Plan's preparation, and no satisfactory justification has been given to indicate that this figure should be so substantially reduced, either within the draft Plan or its underlying evidence base.</p> <p>Indeed, the imposition of a maximum quantum of dwellings that is so significantly lower than the site's true capacity may serve to frustrate the delivery of affordable housing, and potentially of any development on this site. This would render the current allocation ineffective in relation to the objectives of the Plan, and the site capacity should be adjusted to align with more typical urban centre densities. The need to optimise density at this site would only be enhanced through the delivery of the East Reading Bus Rapid Transit Corridor, which appears to remain a core ambition of the Council's Transport Strategy and is referenced under Policy TR2 of the draft Plan.</p> <p>Further, the site at Napier Road has been denoted for the delivery in the 'long term' (2033-41) under Figure 10.1 of the draft Plan. The site is under the single, freehold ownership of our client and is relatively free of constraints, and thus the site is capable of being developed and delivering residential units significantly earlier within the plan period (short to medium term).</p> <p>Finally, it is considered that the allocation's requirement relating to the BUZZ18 bus route</p>	<p>Regarding housing need, please see response to comments under H1.</p> <p>Whilst this is within the defined town centre, it is not a site that is within the town centre character, being some distance outside the core of the centre and adjacent to the Thames and the Coal Woodland. It is considered that an urban density is an appropriate assumption, but that as set out above the range is indicative.</p> <p>There is nothing to prevent a site being brought forward ahead of the indicative timing in the implementation section, which is intended to paint a realistic picture given that no planning application has yet been submitted for this site.</p> <p>The Buzz 18 bus route is identified as an improvement scheme in the Sustainable Connectivity and Vehicle Trip Distribution Study to enhance public transport accessibility, and this site forms one end of the route.</p>
--	---	---

		would be overly specific and thus restrictive, which may risk adding unnecessary challenges to the site coming forward. The most appropriate mitigation in terms of highways/transport impact of the development would be assessed at the time of a planning application coming forward, and it would not be appropriate to prescribe this method at this stage. This requirement should thus be removed.	
Thames Water	CR14x	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided modelling may be required to understand the impact of development.	No changes required.
Thames Water	CR14y	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided modelling may be required to understand the impact of development.	No changes required.
Environment Agency	CR14z	<p>Kennet and Avon Canal Main river running adjacent.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>This site is in FZ1 but has main river running adjacent. A minimum 10m buffer zone would need to be incorporated into any built development on these sites, which is not clearly stated in the Local Plan policy.</p>	<p>Noted. No change proposed.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>EN11 states the need for a 10m buffer.</p>

		A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.	The Water Quality Assessment forms part of the submission background evidence.
Opus Works on behalf of Mapledurham Properties Limited	CR14z	<p>As identified in our Regulation 18 submission, Royal Court is in significant need of refurbishment and provides little by way of architectural and/or visual merit in what is a prominent 'island' location.</p> <p>The nature of Royal Court, which is now 40 years old, means that it would be uneconomic to refurbish the flats to bring them up to date with required EPC standards. Additionally, redevelopment of Royal Court in isolation would lose the opportunity for a comprehensive scheme with Sapphire Plaza to come forward at a time when both the National Planning Policy Framework (NPPF) (as amended December 2024) and the LPU are clear on the need to identify and deliver much-needed housing to alleviate an acute, long-standing crisis in terms of supply and affordability.</p> <p>The HELAA assessment of Royal Court was undertaken separately from Sapphire Plaza, which we contend is an erroneous start point for the site assessment; both the Call for Sites and Regulation 18 submissions made it clear that it was intended to redevelop the whole site. this including Royal Court and Sapphire Plaza. Indeed, the Regulation 18 Local Plan Consultation recognised the potential allocation for residential development of c. 250 – 400 units across the site.</p> <p>By considering Royal Court separately, constraining the development potential to within its own red line and taking proximity to the canal and buildings to the south into account, the HELAA concluded that only 43 dwellings could be provided on site and the site was therefore discounted from further assessment.</p> <p>The due diligence undertaken to support our submission clearly robustly identifies that the site is suitable, available and deliverable and that a whole-site redevelopment will provide significant benefits that could not be achieved simply through allocation of Sapphire Plaza – no development will come forward on the basis of one of the two sites coming forward in isolation for the reasons set out in this document.</p> <p>The proposals represent a uniquely sustainable scheme that will also transform an area subject to poor urban greening and tree cover, anti-social behaviour and urban blight. most sustainable solution and one that will rejuvenate the site and provide lasting benefits within the locality.</p>	<p>No change proposed.</p> <p>It is considered the most robust approach to divide up potential development sites in the HELAA to allow the most detailed assessment, which has been done for a great many sites including many existing ones. Royal Court and Sapphire Plaza in their current form are very different sites and the assessment needs to be different. This does not prevent sites from being combined in any allocation.</p> <p>It is unlikely that any combined assessment in the HELAA would have come to a different conclusion on the capacity of the two sites given that the starting point is a pattern book density approach. Proximity to the canal and buildings to the south would have been taken into account in a combined assessment as well, and it is important that such factors are taken into account to avoid giving an unrealistic picture of likely development capacity.</p> <p>The Council continues to believe that the likely uplift in dwellings on Royal Court is not sufficient for it to be identified as an allocation. However, that would not prevent it from being considered through the planning application process.</p>

		A comprehensive approach has been taken to the development, which has been subject to local engagement and consequent refinement to ensure that it meets a series of competing wants. In particular, this scheme focusses on how to deliver meaningful affordable housing to the groups that can benefit from it the most, key workers, in turn this benefitting the town through the attraction and retention of this part of the workforce.	
Thames Water	CR14z	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided modelling may be required to understand the impact of development.	Noted. No change required.
Historic England	CR15	We recommend the policy refers to avoiding unacceptable harm to the historic environment and requires early engagement with Historic England.	No change required. This is best addressed by EN1, although the policy itself also states that the Council will seek to remove features that harm the asset.
Matt Rodda MP	CR15	I am also very pleased to see that the historical significance of Reading Gaol is remarked upon in the plan. The plan states that the site should be put to a use compatible with its heritage, which should include a cultural, leisure or heritage element, that draws on its significance and provides wider benefits to the town centre. Furthermore, it is reassuring that any proposals for additional development must demonstrate that they would not have a detrimental impact on the significant archaeological interest of the site.	Noted. No change required.
Berkshire Gardens Trust	CR15	We would request that Forbury Gardens are included as part of <i>the cluster of heritage interest and cultural setting of The Abbey Quarter</i> under CR15: <i>The Reading Abbey Quarter</i> final text; and not just left to the explanatory note at the end.	Do not agree. It is unclear what additional benefit this would provide, particularly since Forbury Gardens
Reading Conservation Area Advisory Committee	CR16	Response re: City Centre Framework 'published in 2002'. The copy on RBC's website seems to date from March 2008. https://images.reading.gov.uk/2019/12/City-Centre-Framework-2008.pdf	It is unclear what is meant by this comment as the City Centre Framework is not cited within CR16.

AWE plc and AWE plc on behalf of the Ministry of Defence (MOD)	Section 6: South Reading Para 6.2.1	<p>AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of first: the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield; and secondly that there is either an absence of reference to policy OU2 or wording which only addresses part compliance with policy OU2. AWE and MOD are concerned that the importance of policy OU2 and its application to ALL policies and proposed development within the DEPZ should be restated within policy area specific policies, particularly when located within or close to the DEPZ, in order to avoid any confusion and to avoid any suggestion that a proposal that complies with this policy but not OU2 is otherwise compliant with the plan as a whole such that a decision to grant planning permission is in accordance with the development plan. This could undermine the effectiveness of OU2 in protecting the current and future operations at AWE Burghfield and public safety and therefore raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by:</p> <ol style="list-style-type: none"> 1. The inclusion of an additional key principle recognizing the constraint imposed by the AWE B DEPZ and that any development located within the DEPZ must comply fully with policy OU2; 2. The inclusion of the following text within policy SR1 and SR4e: “Any development proposals within the Detailed Emergency Planning Zone for AWE Burghfield must comply fully with policy OU2”. 	No change proposed. The Council would be content with the recognition of the issue of the DEPZ for AWE Burghfield as a key principle, but consider that an additional such principle is a change that would need to be a main modification. In terms of the individual policies, policy OU2 will apply in any case.
Mark Drukker	Section 6: South Reading Para 6.2	<p>6.2.1 c South Reading is not accessible by the BRT, which goes down the A33. There would have to be more orbital bus routes that link with BRT.</p> <p>Fig 6.1. BRT should not go round the estates. BRT should go through the estates, serving traffic objectives.</p>	No change proposed. This is not within the scope of the Local Plan.
Wokingham Borough Council	Section 6: South Reading Figure 6.1	<p>Figure 6.1 illustrates aspirations for the A33 to become a Bus Rapid Transit (BRT) route into Reading. Historically this was the basis for changes to B3031 Basingstoke Road corridor when the A33 was opened. If these proposals are intended to support greater levels of modal shift via the Mere oak Park & Ride which is situated within Wokingham Borough, these should be supported by transport evidence to inform effects on the wider transport network.</p> <p>Figure 6.1 also illustrates that the BRT would extend towards the A327 corridor, into the highway network within Wokingham Borough. The basis for BRT proposals contrasts with the Superbus network depicted in Figure 4.7, again highlighting the limitations of</p>	<p>The A33 has long been identified as a corridor for Mass Rapid Transit, now known as Bus Rapid Transit, and many of the physical works to accommodate this are now complete.</p> <p>The Council would be content with an alteration to figure 6.1 to bring it into line with figure 4.6 but considers that</p>

		supporting evidence. Indeed, paragraphs 4.5.8 attempt to expand of BRT and Park & Ride sites, which might incorrectly reference Figure 4.9 (instead of 4.6), but supporting text for Mobility Hubs, suggests that Figure 4.9 might have been omitted.	this would likely be a main modification. The reference to figure 4.9 is incorrect, and this is proposed to be corrected.
John Wilkins	SR1	I note that parts of what appear to be the closed landfill in Island Road are identified for commercial development. Is this land really suitable for this purpose?	Any proposals will be assessed in detail to ensure “it will not cause any negative impacts on human health or on the wider environment.”
Savills on behalf of Foudry Properties Ltd	SR1	With reference to paragraph 35 of the NPPF 2023, Policy SR1 as currently worded does not meet the tests of soundness. Accordingly, in order to ensure the soundness of the Plan, it is important that the Council includes waste activities requiring enclosed industrial premises in the list of acceptable uses within the MOA, within the main body of Policy SR1.	Do not agree. The policy as stated does not prohibit this use and any proposal would be considered in detail at application stage. It is not necessary to specify “waste activities requiring enclosed industrial premises.”
Stantec on behalf of SEGRO plc	SR1	SEGRO recognise the strategic nature of the Site and its ability to deliver high-quality employment which will contribute towards Reading Borough’s employment needs and the provision of a significant number of jobs. SEGRO support the continued allocation of the Site and its recognition as a major opportunity area. SEGRO agree with the update to Figure 6.2 of the adopted Local Plan which reflects the latest position of development on the Site (with the removal of SR1b as the development has been completed). SEGRO support the removal of the identification of approximately 120,000 sqm to 150,000 sqm of new business space from Policy SR1 given it would be more appropriate to identify achievable amounts of floorspace on a site-specific basis, particularly now that sub-area SR1b of the Island Road Major Opportunity Area has been completed. Whilst reference to the figures of 120,000 sqm to 150,000 sqm have been removed from Policy SR1, SEGRO note that the indicative floorspace requirements for sub-area SR1a have been updated. Policy SR1a is now required to provide an indicative floorspace of 90,000 sqm – 133,000 sqm (this was previously 95,000 sqm – 116,000 sqm) of industrial / warehouse / Research and Development uses. SEGRO support the increased indicative potential of the floorspace for the Site and consider that this provides further flexibility in the range of floorspace brought forward on site. SEGRO note the identification of research and development uses for the Site, as set out at Policy SR1a. However, SEGRO requests that the policy avoids requiring all the uses identified (industrial, warehouse and research and development) to be present as part of	Noted. No change proposed. The policy does not intend to require that all the uses listed are present on site. It is agreed that a decision on this site will need to weigh the importance of meeting identified needs with the considerations around the DEPZ and other matters. It is not considered necessary to explicitly state that proposals that meet policy requirements be approved without delay.

		<p>an application on the SR1a allocation. It is considered that a mix of uses or a single use is proposed for the Site which responds to market needs and demand within the area. Thus, SEGRO support additional flexibility in the wording of the policy to ensure that an appropriate mix of uses can come forward in response to employment market demand and the policy does not require the delivery of all uses identified in the allocation to be proposed for an acceptable allocation.</p> <p>SEGRO consider that the extent of the DEPZ will need to be weighed against other factors such as the allocation of the Site in an adopted Local Plan and the Council's expectation it will be developed to deliver significant investment, jobs, and rates for the Borough. It is considered that the delivery of the Site and its ability to meet substantial employment need is a significant factor weighing in favour of its redevelopment and this should be considered when a planning application for the Site is submitted. This is particularly relevant when noting the urban nature of Reading and the limited space available within the Borough to deliver a strategic employment development which can significantly contribute towards the local economy. However, SEGRO request that additional wording and clarity is included within the policy to acknowledge that planning applications on the allocation that are in accordance with the necessary requirements of the DEPZ should be approved without delay.</p>	
Thames Water	SR1	<p>In relation to the site currently allocated as SR1c, Island Road A33 Frontage Thames Water continues to support the flexible commercial uses proposed in this allocation. Since the allocation was made over five years ago the need for and importance of storage and distribution has increased. This was reflected in the Council's intention in its recent Call for Sites to review policies SR1 and EM1 responding to the NPPF para 83 (now 87) requiring planning policy to consider the need 'for storage and distribution operations at a variety of scales and in suitably accessible locations'. The SR1c site is able to operate at a viable scale for a storage and distribution operation and is in a highly sustainable and accessible location adjacent to the A33.</p> <p>The addition of storage and distribution to the allocation is considered to be compatible to the neighbouring uses including the A33 and Sewage Treatment Works. The site remains deliverable in the Local Plan period with no known deliverability constraints. The extant allocation demonstrates the acceptability of employment uses including industrial and warehousing. Storage and distribution is considered to have similar impacts to general industrial uses so would therefore not require any further assessment. Thames Water otherwise has no comments to make on the proposed changes and supports the continued allocation.</p>	Noted. No change required.

West Berkshire Council	SR1, SR4	Both of these overarching policies include specific allocations to meet the employment requirements over the plan period. As outlined above some of these allocations are now within the DEPZ (SR1a / SR1c and SR4e) which creates an inherent tension with policy OU2. WBDC has significant concerns about the inclusion of allocations within this area and their potential impact on the OSEP. As such, WBDC would welcome further discussions relating to their inclusion and would welcome the opportunity to enter into a short Statement of Common Ground in this regard.	Noted. A Statement of Common Ground is in preparation to cover these matters. However, retaining the allocations in these policies (which pre-date the extension of the DEPZ) is the only way in which RBC can meet any significant proportion of its industrial and warehouse needs within its boundaries. Removal of these allocations would result in unmet needs. It is also worth noting that site SR1c has an extant permission for a significant office development which would likely result in a significantly greater population on site than the industrial and warehouse allocation.
Environment Agency	SR1a	<p>Site is within FZ3b and FZ2 extents are significant across the site. Main river adjacent. Authorised landfill sites Smallmead farm and Burghfield Site A, Historic landfill site Burghfield area D, Superficial and Bedrock Secondary A aquifers.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>Local Plan policy mentions a 10m buffer from the main river but does not discuss flood risk further. Level 2 SFRA is required and development must pass the exception test.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Noted. No change required.</p> <p>Noted. No change proposed.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>A sequential test has been undertaken.</p> <p>EN11 states the need for a 10m buffer.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Environment Agency	SR1c	There is a small FZ2 and 3 extent in the southwest corner of the site, but it is unclear from the allocated sites shapefile the exact extent of the site boundary. It is possible this site is within FZ1, in which case we would have no comments, but if the site boundary does extend to reach FZ2/3, a Level 2 SFRA is required.	This site is entirely within Flood Zone 1.

		<p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>A sequential test has been undertaken.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Savills on behalf of Foudry Properties Ltd	SR1c	<p>With reference to paragraph 35 of the NPPF 2023, Policy SR1c as currently worded does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy SR1c in order to ensure the soundness of the Plan.</p> <p>SR1c, ISLAND ROAD A33 FRONTAGE:</p> <p>This site will be developed for commercial use. Proposals for industrial, or warehouse or research and development use will therefore be appropriate, as will offices in line with the existing permission. Related commercial uses including small scale waste recycling requiring enclosed industrial premises, car showrooms and trade counter uses as part of the mix may also be appropriate, although proposals that would involve main town centre uses (excluding offices) will only be appropriate where there is no significant adverse impact on existing centres. Temporary uses that would not effect the long term development potential of the site may also be appropriate prior to the redevelopment of the site. The frontage to the A33 will be of high visual and incorporate tree planting to enhance the A33 as a treed corridor as far as practicable taking account of highways safety and highways infrastructure requirements, and an alignment for a mass bus rapid transit route through the site in a north-south direction will be a requirement.</p> <p>Site size: 9.7 ha</p> <p>Indicative potential: 25,000 - 38,000 45,000 sqm of industrial/warehouse/R&D uses, or alternative commercial uses.</p>	<p>No change proposed. There is not considered to be a need to be so specific around uses on the site, as facilities such as small scale recycling will fall within the overall mix of uses identified. Temporary uses do not require reflection in the policy.</p> <p>Inclusion of tree planting along the boundary of this extensive site should generally be achievable alongside highways infrastructure requirements, and this will be considered at application stage.</p> <p>The figures are for indicative potential, and it may be possible to demonstrate that a greater quantum of space can be accommodated. However, the Council has not seen any alternative site capacity work and does not therefore agree that the figure should be increased.</p>
Environment Agency	SR2	<p>Please note that for each of these sites, the site itself is mapped as being within flood zone 1. However, there are unmodelled Ordinary Watercourses (OWCs) in the vicinity of these sites and therefore a FRA will be required as the allocations will increase the</p>	<p>Noted. This will be addressed at planning application stage. As no sources of flood risk are identified for</p>

		vulnerability of the sites, and flood risk from the OWCs will need to be assessed. At planning application stage each respective applicant is likely to need to carry out detailed flood modelling themselves. This should also be considered within the Level 2 SFRA.	this site, it does not form part of the Level 2 SFRA.
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	SR2	<p>The ICB notes that there is a proposal to create a new residential community in this Major Opportunity Area, which will provide 1,000 to 1,490 dwellings. The ICB welcomes the proposed wording of the Policy related to healthcare provision and considers that there may be a potential to support an onsite primary healthcare facility in this new community. Any provisions should refer to the proposed Policy OU1A related to healthcare. The ICB has the following suggestions to Policy SR2:</p> <p><i>SR2: LAND NORTH OF MANOR FARM ROAD MAJOR OPPORTUNITY AREA (Strategic policy)</i></p> <p><i>Redevelopment of the Manor Farm Road site will primarily be for housing enhancement and potential extension to the Whitley District Centre, and open space and public realm improvements. Education and healthcare provision as well as other community uses will also be appropriate uses within a wider development</i></p> <p><i>Development will:</i></p> <p><i>Deliver a fitted-out primary healthcare facility where this is operationally and financially viable and where there is a realistic prospect that an occupier to operate the facility can be found. Any healthcare mitigations must refer to Policy OU1A of this document.</i></p> <p><i>Where development would not provide any onsite healthcare provision but would result in an implication to local primary care services, developers will be required to provide robust evidence including the submission of a health impact assessment (HIA) or other relevant documents to demonstrate that the developments would not have any implications to local primary care services. Developers are expected to engage with BOB-ICB or such appropriate body at an early stage to discuss any offsite primary care mitigations if required. Developers are expected to carry out any required pre-project work at their own expenses to identify the primary care estates project(s) in accordance with the pre-project works. A contribution should be made to provision of offsite primary care mitigations in the form of an offsite financial contribution.</i></p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	No change proposed. Please see previous comments with regard to suggested policy OU1A. The policy does include the potential to accommodate a healthcare facility.

Savills on behalf of British Oxygen Company	SR2	<p>Draft Policy SR2 'Land North of Manor Farm Road Major Opportunity Area' is a 12.06 ha allocation with an indicative potential of 1,000 – 1,490 dwellings and potential net gain in retail and leisure. This allocated site would be located approximately 170 m south of the existing BOC site at Rose Kiln Lane. Whilst BOC does not object to the principle of new residential development in Reading, it is imperative that these developments are sustainably and appropriately located and that adverse impacts to future residential amenity are avoided through mitigation measures, especially in respect of noise impacts. Draft policy SR2, Part v. states that <i>“Development will: v. Provide an appropriate buffer along the frontage of Manor Farm Road to reflect the commercial nature of land to the south and to avoid introducing new homes into an area where existing commercial activities could detract from the amenities of future residential occupants;”</i> The current wording ignores the potential impacts from the commercial and industrial uses to the north of the draft allocation, including those within Core Employment Area EM2e, which includes BOC's site north of Rose Kiln Lane. Therefore, it is suggested that the wording of draft policy SR2 includes acoustic mitigation/soft boundary treatment along the northern boundary of Manor Farm Road Major Opportunity Area.</p> <p>Furthermore, BOC objects to the undefined description of <i>“Provide an appropriate buffer”</i>. The draft policy is not justified or effective in stating what an “appropriate buffer” would consist of between the proposed residential units and existing commercial/industrial activities. It is unclear and undefined, and more certainty is required as to the specifications of “the buffer” to reduce the adverse impacts of the existing employment uses to the north and south. The previous wording of <i>“include transitional non-residential uses”</i> is unambiguous and would offer a greater level of separation and protection for both the residential and employment areas.</p> <p>In light of this, the draft policy wording for the draft site allocations SR3 and SR4c is more comprehensive and inclusive of noise implications. We therefore recommend that the draft site allocation SR2 should include similar wording to replace the existing, such as the below:</p> <p><i>v. “...Ensure that there are measures in place ... to ensure that there are no adverse effects on residents as a result of noise and disturbance and the visual impact of business uses”,</i></p>	<p>Noted. In general terms, the Council would be content with the proposed changes to criterion v, but consider that this is likely to constitute a main modification.</p> <p>As a general point, the Core Employment Area north of Rose Kiln Lane (including the BOC site) is some distance from the proposed allocation, and there is a retail park located between the BOC site and the allocation. It is considered more likely that there will be impacts arising from the service access of the retail park than from the BOC site or the remainder of the CEA.</p>
NHS Buckinghamshire, Oxfordshire and Berkshire West	SR3	<p>The ICB notes that there is a proposal to provide 360 to 540 dwellings, and this will inevitably have additional pressure to the existing primary healthcare provision. Given the scale of the proposed development, it would not be sufficient to support a new onsite healthcare facility.</p>	<p>No change proposed. It is unclear what additional benefit this would provide as financial contributions are best addressed under CC9.</p>

Integrated Care Board		<p>The ICB is expecting financial contributions are made to either co-fund the proposed healthcare facility in South Reading or to support any estates projects within the existing GP practices in South Reading to provide additional clinical capacity. Relevant wording should be included in the Policy.</p> <p>The ICB has the following suggestions to Policy SR3:</p> <p><i>SR3: SOUTH OF ELGAR ROAD MAJOR OPPORTUNITY AREA (Strategic policy)</i></p> <p><i>Development of the South of Elgar Road site will be for residential), with potential for supporting community uses. The potential for commercial uses to be part of any future mixed-use development hinges on whether a layout can be created that allows the relationship between residential and commercial to be effectively managed.</i></p> <p><i>Development will:</i></p> <p><i>Make financial contributions towards primary healthcare, either co-funding the proposed healthcare facility in South Reading or supporting any estates projects within the existing GP practices in South Reading to provide additional clinical capacity.</i></p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	
National Highways	SR4	<p>This site is close to M4 Junction 11. M4 Junction 11 has limited capacity to accommodate increasing amounts of vehicular travel. National Highways can only comment on this proposed re-development site after modelling including M4 Junction 11 has been undertaken. Flow, and potentially delay and queuing changes, through M4 Junctions 10 and 12 should also be supplied.</p>	<p>Noted. The Transport Modelling report demonstrating no significant impacts on the junction has now been provided to National Highways.</p>
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	SR4	<p>The ICB has no particular concern about the proposed changes to some of the sites to reflect the latest developments but considers that new population generated from those identified sites will inevitably have additional pressure to the existing primary healthcare provision.</p> <p>Any residential developments identified in this Policy are expected to make financial contributions to either co-fund the proposed healthcare facility in South Reading or to support any estates projects within the existing GP practices in South Reading to provide additional clinical capacity. Relevant wording should be included in the Policy. The ICB has the following suggestions to Policy SR4:</p> <p><i>SR4: OTHER SITES FOR DEVELOPMENT IN SOUTH READING</i></p>	<p>No change proposed. It is unclear what additional benefit this would provide as financial contributions are best addressed under CC9.</p>

		<p><i>The following sites will be developed according with the principles set out in this policy:</i></p> <p><i>All allocated sites within this Policy are expected to make financial contributions towards primary healthcare, either co-funding the proposed healthcare facility in South Reading or supporting any estates projects within the existing GP practices in South Reading to provide additional clinical capacity.</i></p> <p><i>Developers must engage with NHS Buckinghamshire, Oxfordshire, and Berkshire Integrated Care Board (BOB-ICB) or such appropriate body at an early stage if it is intending to include primary healthcare as one of the potential community uses of the site. Developers are expected to carry out a pre-project work at their own expenses to work out the detailed specification of the provision. Any onsite provision must refer to Policy OU1A of this document. Subject to the agreement with BOB-ICB, any primary care mitigations including but not limited to an onsite provision or an offsite mitigation, will be secured through planning obligations.</i></p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	
Savills on behalf of Sorbon Estates Ltd	SR4	<p>Draft Policy SR4g identifies the site for residential development of '150-220 dwellings'. It is however unclear how this exact range has been calculated and there are different references within the supporting evidence base, e.g. the SA (November 2024) which considers options for development of 100-150 or 200 dwellings at the site.</p> <p>In this regard it is notable that the accompanying Vision Document demonstrates the capacity for at least 240 homes, including a range of housing, based on consideration of the site constraints and opportunities. It is important the Vision Document (which has been informed by further design and assessment work), as well as the supporting LPPU evidence base, is also taken into account in defining a quantum of development within Policy SR4g.</p> <p>Notably, the assessment of the highest capacity option (200 dwellings) in the SA (November 2024) is identical to the lower capacity option (100-150 dwellings), aside from a statement that, 'it is likely that a development that comprises a smaller urban density would be more appropriate to the surrounding townscape and location...'. It is however clear from the brief reference to 'it is likely' that this assessment has not been informed by any detailed assessment.</p> <p>The lower capacity option 4 (100-150 dwellings), considered in the SA (November 2024) is also assessed to have a 'significant effect...if it has a specific focus on family housing'.</p>	<p>No change proposed. The approach to calculating a range for all sites is to apply 20% above and below the figure calculated in the HELAA. The HELAA is the main place in which the capacity of a site is considered.</p> <p>The dwelling range in the policy is indicative and based on the best information available at the time. It may be that a greater number of dwellings can be accommodated based on more detail, which will need to be considered at planning application stage.</p> <p>The criteria in the policy are not intended to duplicate policy elsewhere but flag up known issues and constraints.</p>

		<p>However, as set out in the accompanying Vision Document, the increased capacity of 240 dwellings could include approximately 50% 3-bed homes and therefore also provide significant and likely greater benefits in the amount of family housing sought.</p> <p>Accordingly, whilst the quantum of development set out in Policy SR4g is only intended as a guide, it is clear that this should be significantly increased based on the SA (November 2024) and the additional design and assessment work undertaken to inform the accompanying Vision Document.</p> <p>It is noted that the supporting text to Policy H2 (as referred to above) is also clear that 'Local Plans should set minimum densities for residential development', and that, 'Even above the minimum density, there is still significant scope for a range of densities.' (paragraphs 4.4.8 to 4.4.10). As referred to above, the approach to setting minimum densities reflects the provisions of the NPPF (2023), and the acknowledgement that the density of town centres site may exceed the minimum density is welcomed. It is however, important that clarification is included to this effect in Policy SR4 itself, along with clarification that the ranges are indicative and intended as a guide.</p> <p>Policy CR14r sets out a list of criteria for development at the Site to address relating to transport, trees, landscape, biodiversity, archaeology, contamination, air quality, noise and water. Notably Paragraph 16 of the NPPF (2023) states that Plans should avoid 'unnecessary duplication' of policies. It is therefore questioned whether these criteria are necessary as part of SR4g given that these matters are covered by other LPPU policies.</p> <p>The draft LPPU (Policy TR2) and draft Infrastructure Delivery Plan (IDP) identify a number of major transport schemes for delivery in South Reading, based on the Reading Transport Strategy 2040, including Bus Rapid Transit for example and other wider public transport improvements. The IDP and Transport Strategy do not however refer specifically to Sunday bus services in this area or in the borough. It is acknowledged that the Site is located in close proximity to public transport nodes and routes along the A33 and Rose Kiln Lane. The proposed development therefore has the opportunity to integrate the new community with the public transport network and support wider accessibility. However, the need to contribute towards Sunday bus services should be determined based on the scale and impact of proposed development. Based on the above, it is considered that the criteria should be amended to refer to contributing towards improved Sunday bus services as appropriate.</p> <p>It is not anticipated redevelopment of the Site would adversely affect this land and would rather provide opportunities for conservation, links to the green and blue network and</p>	<p>The improved Sunday bus service was an improvement identified in the Sustainable Connectivity and Vehicle Trip Distribution Study.</p> <p>In terms of the criterion relating to the watercourse, this reflects the approach applied to sites in the vicinity of watercourses and policy EN11.</p>
--	--	--	--

		<p>biodiversity enhancement. Indeed given Sorbon's control over the adjacent land, the Site also represents a unique opportunity for residential development on the edge of the town centre to link into and 'open up' areas of the green open space to the local community; with footpath connections and increased connectivity into the existing Public Right of Way (PRoW) network.</p> <p>The Site is located adjacent to Holy Brook where the design of proposed development will seek to provide an appropriate response. This criteria however requires further clarity and evidence regarding the required set back distance sought and the definition of 'development' and 'top of the bank'. It is recommended that the criteria is updated to include reference to 'built development' and to delete a specific set back distance which should be determined instead through further detailed design and technical assessment work.</p>	
Stantec on behalf of St Edwards Homes Limited	SR4	<p>Land at Green Park Village is a 0.24ha site that has been promoted through the Council's Call for Sites exercise. The site, shown on the submitted Location Plan (drawing reference 27429-Phase-003 Rev P1) forms part of Green Park Village located in South Reading for which planning consent was granted for a mixed-use development comprising housing, community uses, offices, retail, a primary school, health surgery, nursery, sports pitches, children's play and associated infrastructure and engineering works in 2009 (application reference 07/01275/OUT). A revised scheme was approved in 2011 (application reference 10/01461/OUT). The development is nearing completion. The land, in the south-west of Green Park Village, was originally permitted for a multi-storey car park use associated with the recently opened Green Park train station and interchange. It has recently been confirmed by the Council that the multi-storey car park use is no longer required. As such, alternative uses for the site have been considered.</p> <p>The enclosed plans (drawing references 27429-Phase-003 and 27429-Phase-003a) illustrate a residential development on the site comprising up to 50 new homes (including affordable homes), community space, open space and associated parking and infrastructure. The development will form an addition to the established and growing community at Green Park Village, benefitting from easy access to the amenities and facilities already in place as well as good transport connections to the wider area.</p> <p>St Edward will utilise their unique set of placemaking and placekeeping skills to deliver a high-quality development which will complement and enhance the wider Green Park Village, helping to cement the legacy of the development. The site is currently in use as construction compound. Development will enable a positive use of brownfield land,</p>	<p>This site is not proposed to be included as an allocation due to its location within the DEPZ. There is not considered to be a realistic prospect that additional residential development can be accommodated in the emergency plan and therefore, an allocation is not considered to be suitable or deliverable.</p>

		<p>contributing to the wider Green Park Village and community as well as delivering much needed housing for Reading.</p> <p>The site is located within Flood Zone 2 and development proposals will be designed to address the risk of flooding on site.</p> <p>The site is located within the DEPZ. As noted above, St Edward are working with Emergency Plan specialists to ensure that any development would be supported by appropriate safety measures.</p>	
Environment Agency	SR4a	<p>The site is within FZ3b where main rivers (Holy brook and River Kennet) run adjacent and through it. Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>The Local Plan policy mentions a buffer zone to the main rivers and that there shall be no development in FZ3. This allocation should be included in the Level 2 SFRA and the exception test must be passed.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>A sequential test has been undertaken.</p> <p>This site has been included in the Level 2 SFRA.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Environment Agency	SR4b	<p>Please note that for each of these sites, the site itself is mapped as being within flood zone 1. However, there are unmodelled Ordinary Watercourses (OWCs) in the vicinity of these sites and therefore a FRA will be required as the allocations will increase the vulnerability of the sites, and flood risk from the OWCs will need to be assessed. At planning application stage each respective applicant is likely to need to carry out detailed flood modelling themselves. This should also be considered within the Level 2 SFRA.</p>	<p>Noted. This will be addressed at planning application stage. As no sources of flood risk are identified for this site, it does not form part of the Level 2 SFRA.</p>
Environment Agency	SR4g	<p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>This site is in FZ1 but has main river running adjacent. A minimum 10m buffer zone would need to be incorporated into any built development on these sites, which is not clearly stated in the Local Plan policy.</p>	<p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p>

		A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.	A 10m buffer zone is clearly stated within EN11. The Water Quality Assessment forms part of the submission background evidence.
Thames Water	SR4g	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided modelling may be required to understand the impact of development	Noted. No change required.
Thames Water	SR4h	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary.	Noted. No change required.
Turley on behalf of TT Group	SR4h	In terms of the policy wording, we respond in turn to each of the bullet points listed in the draft policy wording. • Site Access - TT Group support the suggestion that access into the site should be accessed from Christchurch Gardens. This would involve the retention of the existing access and is therefore considered the most appropriate solution from a highways perspective. However, it is important to note that existing access also exits from Basingstoke Road, and as a result we would suggest that the potential for Basingstoke Road to be used as a secondary / emergency access is safeguarded.	Noted. In terms of access, it is agreed that the policy wording should be amended to refer to access primarily being from Christchurch Gardens. Use of a secondary access would need to be considered in more detail at application stage.

		<p>We would suggest that the policy wording in respect of this bullet it updated to state “Primary access should be from Christchurch Gardens, with options for secondary / emergency access from Basingstoke Road”</p> <ul style="list-style-type: none"> • Green link – TT support the aspiration of creating a landscape-led biodiverse site and therefore support the provision of a green link as a matter of principle. It is noted that the proposed green link (as identified on the draft policies map) runs adjacent to the eastern boundary of the site, this is broadly supported as it allows for the best utilisation of the site and maximising brownfield land. We note that this route is indicative on the proposal map at present, however it will be important to ensure that this route is sensitively designed not only for ecology, but to ensure safety of users and is adequately lit at night and subject to natural surveillance. As a result TT Group will actively work with the Council during pre-application discussion to ensure the route achieves the relevant aspirations from the Council, whilst ensuring the safety of users. • Trees - TT Group are aware of the number of TPO trees that are located within the site boundary and would ensure that as part of any development proposal these trees are sensitively considered as part of a wider landscape strategy to avoid any adverse impacts from future development. This would be managed through a robust Arboricultural Impact Assessment prepared through the planning application process. • Conservation Area - TT Group note that any development proposed would need to contribute towards enhancing the setting of the Christ Church conservation area. The site at present is an old sui generis telephone exchange, in a largely residential area. There are clear opportunities for any redevelopment proposal to not only respect but enhance the setting of the conservation area with a more sympathetic design, which responds to its surrounding context. TT will ensure that the proposals are prepare in conjunction with a heritage consultant to ensure the design of any scheme has considered the surrounding heritage context. • Air Quality - the site falls within an Air Quality Management Area as identified on the draft policies map. The use of the site for residential purposes is more akin to its surrounding environment and the location of residential uses in sustainable locations such as the site, directly relates to reducing vehicle movements on the surrounding network and inherently manages air quality impact within the Borough. Any application would be supported by a detailed air quality assessment which would consider the potential air quality mitigation such as a detailed Travel Plan and EV charging spaces. 	<p>In terms of inclusion of residential care, there is general wording in paragraph 6.3.16 as in practice the majority of residential allocations would also potentially be suitable for residential care.</p> <p>Regarding the dwelling range, this is noted, but this is an indicative range for monitoring purposes only, and the extent of the range is consistent with the approach to other allocation policies.</p> <p>The remainder of the points are noted.</p>
--	--	---	--

		<ul style="list-style-type: none"> • Back to back – In relation to design and back to back separation distances, TT would ensure that these are appropriate to the context and would be supported by daylight and sunlight assessment where required. • Thames Water - TT Group notes the Council's requirement to engage with Thames Water in terms of potential impacts on water and wastewater infrastructure. A drainage consultant would be instructed as part of preparation of an application. Thames Water would be a statutory consultee as part of any application and we would proactively work with them to ensure any scheme could be appropriately delivered. • Quantum - We note that the Council have stated a range of between 130-200 dwellings that could be delivered on the site. TT Group would welcome a narrower range to be listed such as 175-200, as it is considered the site can accommodate the higher number of dwellings. A more tightly defined range at the higher end would more appropriately reflect the guidance set out at paragraph 123 of the National Planning Policy Framework which states "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land." In support of seeking a more tightly defined quantum, TT Group have undertaken initial capacity studies which highlight that the site is capable of delivering 179 units in a manner sensitive to its surroundings. This initial capacity study is appended to these representations and represents a minimum baseline position. <p>In addition, as set out by our clients Regulation 18 representations in January 2024, TT Group have explored a variety of suitable uses for the Site and have sought advice received from local agents and property experts. This advice suggests that there is a substantial demand from retirement operators for more housing for older people in the local area. As a result TT Group would like to promote some flexibility in the site allocation to allow for both C2 and C3 uses, and enable the Site to deliver traditional residential dwellings as well as housing for older people if the demand remains. We would ask therefore that this element of the site allocation policy is amended to state: "Development for residential (Use Class C3) and/or care home use (Use Class C2) 130-175 Approximately 175-200 dwellings or bedspaces"</p>	
Thames Water	SR4i	<p>Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to</p>	Noted. No change required.

		being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	
Thames Water	SR4j	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Noted. No change required.
Environment Agency	SR4k	<p>European Eel migratory route, site boundary includes southern end of large pond. Based on the site allocation shapefile, the site boundary is >8m from the bank of the river but unclear how accurate this boundary is. Any new development at this site must incorporate a 10m buffer zone from the river and this is mentioned for biodiversity reasons in the LP.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Based on the site allocation shapefile, the site boundary is >8m from the bank of the river but unclear how accurate this boundary is. Any new development at this site must incorporate a 10m buffer zone from the river and this is mentioned for biodiversity reasons in the LP.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Noted. This migratory route and buffer zone is best considered under EN11 and EN12.</p> <p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>A Water Quality Assessment has been produced.</p>
Thames Water	SR4k	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to	Noted. No change required.

		being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	
Environment Agency	SR4	Paragraph 6.3.17 details that the site at 2 Hexham Road already has planning permission (resolved to grant permission subject to signing of S106 agreement). We have been unable to locate any evidence that we have been consulted on this application. Our findings from our constraints screening of the site is that with regards to contaminated land, a desk study and some form of site investigation at a minimum are required here owing to unknown former uses, and the location of the site upon unproductive bedrock aquifer. Therefore, we would highlight that any permission or inclusion of the site within the Local Plan will need to ensure that any contamination at this site is addressed.	This is not within the scope of the Local Plan as the site is not included as a draft allocation.
Mr Sam D'Arcy-Darling	SR5	I believe the plan accurately details the significant biodiversity impact of Kennet Meadows and associated areas. However, I feel there could be some work done to add information about the natural floodplain that exists here and how that further contributes to the climate and strategic reliance of the town.	Noted. No change proposed. Climate resilience is best addressed by EN12 and other environmental policies.
Matt Rodda MP	SR5	I am pleased that the plan mentions Kennet Meadows, which is identified as the largest concentration of areas of biodiversity significance in Reading, and as one of its most significant landscapes. I want the meadows to be preserved as a wildlife habitat and for leisure use and I am pleased the plan recognises their importance of this wonderful green space recreation, such as residents walking in the meadows.	Noted. No change required.
Liz Ellis	Section 7: West Reading and Tilehurst	<p>My comment re the above section 7.2.4:</p> <p>The total number of new buildings suggested in the Reading Borough Local Plan Update in the Tilehurst area is 395. In particular the Park Lane and Downing Road sites would accommodate 75 dwellings. Overall the number of new houses in the area would probably be 1900 as stated in paragraph 7.2.4. This would mean that the number of children who would require infant and junior education in the area would rise significantly. Yet the council are proposing knocking down or reusing a perfectly acceptable junior school (ie Park Lane Junior School) and to build on its playing field in Downing Road. The logic of this proposal seems to be totally unacceptable. Since the plan does not mention any increase in the provision of nursery or infant or junior schools.</p> <p>My comment re section 7.3.6:</p> <p>If all this rebuilding and shuffling around of the junior and nursery education facilities takes place, then it is imperative that the Blagrove nursery site be returned to Blagrove Recreation ground. Reading Borough Council are the custodians of the Recreation Ground and have a duty of care to look after it as a Recreation Ground for the children of</p>	<p>No change proposed. The Infrastructure Delivery Plan that accompanies the Submission Draft details pupil numbers and projected impacts. Many schools within the town are undersubscribed or are expecting pupil numbers to fall in the coming years, alongside national trends.</p> <p>No change proposed. It appears that the Blagrove Nursery School is still in active use.</p>

		Tilehurst. The same is true of the other Parks and Recs in Tilehurst. The council has a duty of care to protect all the Parks and Recs in Tilehurst.	
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	WR1	<p>The ICB considers that new population generated from Dee Park development area will continue to have additional pressure to the existing primary healthcare provision in the local area.</p> <p>Any further residential developments within Dee Park development area are expected to make financial contributions to either support any estates projects within the existing GP practices in West Reading and Tilehurst to provide additional clinical capacity. Relevant wording should be included in the Policy. The ICB has the following suggestions to Policy WR1:</p> <p><i>WR1: DEE PARK</i></p> <p><i>The Dee Park area, as identified on the Proposals Map, will continue to be regenerated to provide a sustainable community including the following:</i></p> <p><i>Financial contributions towards primary healthcare supporting any estates projects within the existing GP practices in West Reading and Tilehurst to provide additional clinical capacity.</i></p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	It is unclear what additional benefit this would bring as financial contributions are best addressed through CC9.
Sport England	WR1	Sport England is supportive of this policy however the requirement any new sports facilities need to be based on a robust evidence base e.g an up to date robust built facility strategy, (BSF) and playing pitch strategy, (PPS). The current Reading PPS is coming to the end of its life, whereas there is no BFS.	Noted. The existing Playing Pitch Strategy dates from 2021 and covers the period to 2036.
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	WR2	<p>The ICB understands that the school site will be redeveloped including the provision of a replacement Tilehurst Clinic. The ICB would recommend the Council to consult with NHS Berkshire Healthcare Foundation Trust for the reprovision in this regard.</p> <p>The ICB notes that the site will have a potential to deliver 15 to 55 dwellings. Given the limited scale of the development, it is not likely to support an onsite healthcare facility.</p> <p>Any residential developments within the school site are expected to make financial contributions to either support any estates projects within the existing GP practices in West Reading and Tilehurst to provide additional clinical capacity. The ICB has the following suggestions to Policy WR2:</p>	It is unclear what additional benefit this would bring as financial contributions are best addressed through CC9.

		<p><i>WR2: PARK LANE PRIMARY SCHOOL, THE LAURELS AND DOWNING ROAD</i></p> <p><i>Financial contributions towards primary healthcare supporting any estates projects within the existing GP practices in West Reading and Tilehurst to provide additional clinical capacity.</i></p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	
Sport England	WR2	<p>This policy is weak and could be considered to be contrary to National Planning Policy Framework. The current PPS is coming to the end of its life, and we do not think it justifies the loss of the playing fields. Secondly the NPPF does not allow for improvements to pitches elsewhere will be necessary to help to offset the loss of playing fields. This should be omitted and replaced by the loss of playing field should be replaced to bring into line with the NPPF paragraph 103.</p>	<p>No change proposed. This policy is not proposed to be updated. The Playing Pitch Strategy does not indicate that the playing field should be lost, which is why the policy continues to refer to a need for this to be justified in relation to local and national policy. This justification will need to include the relevant clauses in the NPPF. The mention of improvements only states that this will help to offset the loss, not that it should be the full approach to this offset.</p>
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	WR3	<p>The ICB has no particular concern about the proposed changes to some of the sites to reflect the latest developments but considers that new population generated from those identified sites will inevitably have additional pressure to the existing primary healthcare provision.</p> <p>Any residential developments identified in this Policy are expected to make financial contributions to support any estates projects within the existing GP practices in West Reading and Tilehurst to provide additional clinical capacity. Relevant wording should be included in the Policy. The ICB has the following suggestions to Policy WR3:</p> <p><i>WR3: OTHER SITES FOR DEVELOPMENT IN WEST READING AND TILEHURST</i></p> <p><i>The following sites will be developed according with the principles set out in this policy:</i></p> <p><i>All allocated sites within this Policy are expected to make financial contributions towards primary healthcare supporting any estates projects within the existing GP practices in West Reading and Tilehurst to provide additional clinical capacity. Subject to the</i></p>	<p>It is unclear what additional benefit this would bring as financial contributions are best addressed through CC9.</p>

		<p><i>agreement with BOB-ICB, any primary care mitigations will be secured through planning obligations.</i></p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	
Environment Agency	WR3b	<p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>Level 2 SFRA required</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>A sequential test has been undertaken.</p> <p>This site has been included in the Level 2 SFRA.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Turley on behalf of CBRE Investment Management	WR3b	<p>This representation has been prepared by Turley on behalf of CBRE IM and is provided in response to the Council's consultation on Local Plan Update (Regulation 19) and specifically in relation to CBRE IM's interest in relation to land at Meadow Road, Reading.</p> <p>The Site is considered to provide a fantastic opportunity to support the economic prosperity within growth of Reading, complimenting the direction of development and existing context of the Site.</p> <p>The following benefits would result from the development of the Site</p> <ul style="list-style-type: none"> • Redevelopment and efficient use of land within an identified Core Employment Area to meet the sustainability and modern institutional requirements for flexible employment uses. • Flexible commercial uses that respect surrounding residential uses and allows for 'start-up' and 'maker' units. • A layout that provides a balance of industrial floor space to office content, extent of service area, ancillary parking, external areas and building height 	<p>Do not agree. The site has significant constraints in terms of being identified as part of a Core Employment Area where industrial and warehouse uses are focused, not least its close proximity to dwellings, including some relatively newly built dwellings along Addison Road. The Employment Area Analysis includes a more detailed assessment. The inclusion of this site in the adopted plan was intended to allow for an improvement of the relationship between employment and residential in this location and the development of this site for employment would undermine this.</p>

		<ul style="list-style-type: none"> • The potential to create biodiversity enhancements through new tree planting, SuDS features and enhanced areas of public realm; and • Direct, indirect and induced jobs created through the construction of the development, stimulating the local economy; <p>However, it is noted that, at the time of writing CBRE IM do not consider the plan to be found sound as measured against the tests of soundness set out in the Framework at Paragraph 35.</p> <p>The ongoing allocation of the eastern half of the site for residential purposes is not supported by the landowner. The site has not been brought forward for residential uses since the adoption of the current Local Plan (since 2019).</p> <p>This is despite the site having never been actively pursued or promoted by the landowner for this use and indeed is contrary to the landowners own aspirations for the site to be redeveloped for employment uses in line with extant lawful use of the site.</p> <p>We consider that modifications are required to remove the site as a residential allocation and to re designate the site as part of the core employment area.</p> <p>CBRE IM would be very happy to discuss these representations further with the Council and provide any additional detail that may be helpful, as part of ongoing engagement.</p>	
Thames Water	WR3i	<p>Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.</p>	Noted. No change required.
Environment Agency	WR3k	<p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Level 2 SFRA required.</p>	Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.

		<p>Sequential test is required.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>This site has been included in the Level 2 SFRA.</p> <p>A sequential test has been undertaken.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Environment Agency	WR3I	<p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p> <p>This site lies entirely within FZ2 and the 1% AEP + 35% CC extents. Therefore, it would not be feasible to compensate the loss of floodplain storage any increase in built footprint the proposed development would bring. This is contrary to policy EN18. This site must be included in the Level 2 SFRA and the exception test must be passed.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>A sequential test has been undertaken.</p> <p>The site is 17% within Flood Zone 2. An exception test is not required according to the NPPF.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Lichfields on behalf of Tilehurst People's Local Charity	WR3s	<p>For the reasons outlined, our client considers that the LPPU19 is unsound for the following key reasons:</p> <ul style="list-style-type: none"> • RBC's proposed changes to existing allocation at our client's site at Kentwood Hill (Policy WR3s) could prejudice much needed development at the site. This would undermine the LPPU19's ability to meet its aims "to continue to address the housing crisis and to reflect national policy" (para. 4.4.4). This is also inconsistent with the NPPF (December 2023) requirement to "meet as much of an area's identified housing need as possible" (para. 60) and to ensure that "a sufficient number and range of homes can be provided to meet the needs of present and future generations" (para. 11b). The proposed strategy relating to our client's site is not appropriate, therefore is not justified and the LPPU19 thus is not considered sound. • RBC's proposed approach to Policy WR3s would constrain RBC's ability to provide 	<p>Do not agree. Although the boundary of the site has been reduced due to its identified biodiversity value, the remainder of the site will still be able to deliver much needed housing, including family housing.</p> <p>It is only proposed to designate the part to be removed from the existing allocation as Local Green Space, not as identified biodiversity interest. If the site is identified as a Local Wildlife Site (outside the Local Plan process) this</p>

		<p>family housing within the borough. This is inconsistent with the NPPF (December 2023) which sets out the requirement “to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community” (para. 60). The LPPU19 is not consistent with national policy and therefore not considered sound.</p> <ul style="list-style-type: none"> • RBC’s proposed approach to predicate the allocation of Policy WR3s on it not being designated as an LWS, and the failure to introduce flexibility to the policy text of WR3s to allow for the implementation of mitigation measures is inconsistent with NPPF (December 2023) para. 11b, 185 and 186. The LPPU19 is inconsistent with national policy, therefore is not considered sound. • RBC’s proposed approach to land stability which does not accommodate reference to mitigation measures is inconsistent with NPPF para. 189 and is therefore not sound. 	<p>latter designation would apply because all LWSs are covered.</p> <p>As Reading is a primarily urban Borough, small parcels of important habitat have particular significance, and as such, in line with EN12, where they exist they should be preserved wherever possible.</p> <p>The wording of the bullet points is not intended to set out the full policy position in relation to the main issues, rather to flag up these issues. In the case of land stability, adequate mitigation will ensure that there is no detrimental impact on the site or nearby areas.</p>
Deborah Dadd	WR3s WR3t	<p>Please add my comments that I fully believe that all of sites WR3s and WR3t meet the criteria to become designated away from residential to being protected as Local Green Space(LGS) whilst I am pleased to see some movement in RBC’s acceptance of the importance of the land as special for wildlife.</p> <p>All of it meets all of the 3 criteria laid out as being essential to designate LGS status. As LGS is defined by Government as “a way to provide special protection against development for green areas of particular importance to local communities”, one of the criteria for designation is where those spaces are “demonstrably special to the local community”. It should not be decided upon based on the view of the landowner or their agents over and above the view of the local community which it appears to have been done given the developer’s ecologist’s admittance of badger setts is cited in feedback on comments to the last consultation. This is unsound - putting one group’s view over another (developer v local community) especially given the importance of community not developers in the LGS designation. This reasoning not to grant LGS across both sites is also unsound reasoning from an ecological perspective. Badgers given protection of main sett but not all setts; ignores the fact that other protected species have been evidenced</p>	<p>Do not agree. A significant amount of the wider area outside the designation is already identified as Local Green Space and it is proposed to add the areas with the greatest wildlife value to that. The remaining land proposed to be designated for residential consists of the builders yard and its surroundings and an area at Armour Hill, and the Council’s view is that they are not of a sufficient level to qualify as Local Green Space. It is not simply a case of the Council taking one side over another.</p> <p>Do not agree. The site at EN7Ww serves an important recreational and</p>

		<p>across all of the 2 sites (total of 28 protected or notable species from TVERCs published lists); ignores the fact that animals including badgers need an area to find food in not just somewhere to sleep; appears to consider that retaining and avoiding detrimental impacts (as cited as a condition of development in the proposed wording) can be met whilst simultaneously reducing the space available to wildlife for breeding, refuge, hunting and foraging from the area they are currently surviving in of 1.88 ha (1.43 + 0.45) to just 0.46 ha – a 75% loss of available space.</p> <p>I also would like to draw attention to the unsoundness of the different approaches to this LGS compared to the newly adopted LGS EN7Ww. EN7Ww are playing fields, privately owned with no general public access associated with a private sports club. Only 4 members of the public agreed with the designation of LGS (compared to nearly 70 for WR3s and t), there is no campaign of local people, no local meetings held so no evidence that the qualitative “demonstrably special” LGS criteria has been met at all. Given the facilities are near adjacent to the RBC owned Rivermead Sports Centre it is hard to count this as special at all and there are many recreation grounds across all of RBC compared to the minimal LWSs that are offered protection. In the wording of questions for the Regulation 18 consultation there is a marked difference between the 2 proposed LGS areas - the author asks people to feedback whether they think EN7Ww qualifies as LGS as with WR3s and WR3t but with RBC leading the responses to say EN7Ww should be LGS. EN7Ww is just de facto accepted as LGS in the partial update put forward for Regulation 19 consultation and onwards submission to the Planning Inspector.</p>	<p>leisure role and clearly meets the criteria defined for LGS within the NPPF. It was identified as requiring retention within the Playing Pitch Strategy. It is important to note that the size of a local campaign is not a planning consideration, rather the purpose of the campaign is to raise planning matters to be considered by decision makers. Public consultation is not intended to tally votes for or against a proposal, but rather to ensure that all factors are taken into view for a balanced decision.</p>
Alex Foxon	WR3s, WR3t	<p>I believe the Council's designation of only part of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) as Local Green Space is unsound. I believe that ALL the land should be granted Local Green Space status as it all satisfies the criteria.</p>	<p>Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity.</p>
Anna Iwaschkin	WR3s, WR3t	<p>I write to support the submission of Keep Kentwood Green to ensure that the full woodland on Kentwood and Armour Hills is definitively designated as 'Local Green Space' so that any proposals for development on it are denied.</p>	<p>Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now</p>

		<p>Firstly, The woodland is and protects the habitat of rich local wildlife: small mammals, trees , wild flowers, insects and invertebrates. The once rare beautiful Jersey Tiger Moth has chosen this site for colonies. The land connects with and is part of a long green corridor from the Thames stretching across parks and green spaces right over to the Kennet. Thus it provides a vast stretch of land for biodiversity. Equally, the area is part of a substantial green lung for a busy congested urban area. Also, to take it away would be to deny the local community a sense of peace and tranquility.</p> <p>Part of Reading's much loved unique local architecture are the characterful Victorian painted brick row cottages, houses and special buildings of which there are a number in the area of Kentwood and Armour Hills. A modern housing development there in among the historic properties would be a very unfavourable, messy,look.</p> <p>This piece of land has been fought over for many years by the local community and, every time, they have managed to conserve it to their great joy. Please help them to conserve nature and also their local identity.</p>	<p>included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity.</p> <p>Air quality and design are best addressed by policies EN15 and CC7, respectively. At such time an application is made, these matters will be considered in detail.</p>
Bernard Fyans	WR3s, WR3t	<p>I believe the Council's designation of only part of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) as Local Green Space is unsound. As a local resident, I believe that ALL the land should be granted Local Green Space status as it all satisfies the criteria.</p>	<p>Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity.</p>
Dave Newnham	WR3s, WR3t	<p>I am writing express my views on the areas Kentwood Hill and Armour Hill (WR3s and WR3t) should be designate as local green space and not just the 0.46 HA that has been added since the last version of the plan.</p> <p>I don't believe the plan in its current form reflects views of the local residents.</p> <p>The local green space designation should be applied to all this land as it meets the criterion for this. It has been demonstrated also that there is an abundance of wildlife.</p> <p>It is unfair to recognize this for development in any way as TPLC and their agents refuse to allow for an independent wildlife survey and continue to ignore completely the views</p>	<p>Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity.</p>

		<p>and of evidence of wildlife submitted by the local residents and expert opinions of CPRE England and BBONT the Badgers trust and Rural England.</p> <p>All of the land is a vital habitat for a diverse range and wildlife for hunting, breeding and refuge, and planning consideration is completely flawed and unjustifiable. This is also a wildlife corridor which would suggest also that other nearby areas would be impacted also.</p> <p>Please help to preserve these spaces for generations of us and also wildlife.</p>	Any further information provided by TVERC will be considered in detail as it emerges.
Hazel Sims	WR3s, WR3t	<p>I believe that the councils designation of only part of the land at Kentwood Hill WR3s and Armour Hill WR3t as local green space is unsound. This land, in my view, should ALL be granted local green space status as it all satisfies the criteria.</p> <p>The LGS status should be given to all of the land as requested and not just the small change to site WR3s. All of the space meets the LGS criteria (in reasonably close proximity to the community it serves; is demonstrably special to a local community and holds a particular local significance because of the richness of its wildlife; and is local in character and is not an extensive tract of land)</p> <p>It is unsound of RBC Officers to take the view of the landlord TPLC and their agents who want to develop the land when LGS is about allowing local communities to protect green space that's important to them.</p> <p>It ignores all the evidence submitted of the variety of wildlife found across all of the land (over a 100 different species) and expert opinions from CPRE England, BBOWT, Badgers Trust and Rural England.</p> <p>All of the land is vital to support the wildlife for hunting, breeding, foraging and refuge so it's flawed environmental reasoning to suggest that small areas of land of 'greatest importance for wildlife' would not be adversely affected by development of broader hunting, foraging grounds. Some species - bats and birds - identified predominantly in skies around the builders yard and on Armour Hill.</p> <p>There is also a stark contrast between what is expected to be provided for granting LGS designation to these sites compared to that of previous designations (like the Victoria Rec and the allotments) and the new additional proposed LGS in this partial plan update of the Ibis Sports Club (a private club with playing fields adjacent to RBC owned Rivermead centre).</p>	<p>Do not agree. No change proposed.</p> <p>LGS criteria within the NPPF is not intended to protect allotment sites. The area identified as LGS does have richness of wildlife and has been designated as such.</p> <p>Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity. Any further information provided by TVERC will be considered in detail as it emerges.</p> <p>Each LGS site is assessed on a case-by-case basis according to the criteria within the NPPF and is detailed within the evidence base.</p>
Jennie Newnham	WR3s, WR3t	<p>I am writing with regards to the future of the land at Kentwood Hill and Armour Hill in Tilehurst. I believe all of the land at Kentwood Hill and Armour Hill (WR3s and WR3t)</p>	<p>Do not agree. No change proposed.</p> <p>Detailed evidence provided by</p>

		<p>should be designated as local green space - and not just the 0.46ha that has been added since the last version of the plan. I don't believe this is sound and goes against the views of the local residents.</p> <p>All of the space meets the criteria for Local Green Space not just some parts of it. There is plenty of evidence to show wildlife in and around the entire space which makes it therefore unsuitable for development. TPLC and their agents are underhand by refusing an independent wildlife survey and ignore the views and evidence submitted by local residents and experts.</p> <p>I am an allotment holder on this site and personally love the fact that whenever I go to my allotment I see wildlife, whether it's foxes, deer, slow worms, beautiful birds. I don't even mind when the badgers eat my sweetcorn and dig holes on my plot!</p> <p>All of the land should be classed as Local Green Space for this reason. We need to protect the wildlife around us and not destroy their homes just to make more homes for us.</p>	<p>ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity.</p>
Jennifer Cottee	WR3s, WR3t	<p>I think the current wording regarding the future of allotment land should be more tightly worded so that throughout the life of the plan the intention to protect the allotments currently owned by TPLC is totally unambiguous. Regarding the site WR3t LAND AT ARMOUR HILL, I support the proposed changes with one exception. I suggest that bullet point 2 should be clarified further changing it to "Ensure that as a result of the development there is no reduction in vehicle access to, parking for and security of the allotments or any reduction in the area of land used as allotments."</p> <p>Regarding the site WR3s LAND AT KENTWOOD HILL</p> <p>Unlike WR3t the land WR3s has not been subject to planning application under a Reading Borough Local Plan. Consequently, possible effects of development of site WR3s on the allotments have not been aired widely. It is within the bounds of possibility that a future application would include an additional entrance to the allotment site from Kentwood Hill, and in the process some land/plots might be taken out of use as allotment plots. In the search for clarity, I suggest similar wording should be used to protect the allotments as suggested for WR3t. Thus I request an additional bullet</p> <p>Ensure that as a result of the development there is no reduction in vehicle access to, parking for and security of the allotments or any reduction of the area of land used as allotments.</p>	<p>Noted. In terms of the proposed amendment to refer to the area of land used as allotments, the Council would be content with this amendment but consider it would likely constitute a main modification.</p> <p>There is no existing access to the allotments from WR3s, and whilst it is conceivable that such an access could be created, it is not considered sufficiently likely to require an additional clause in the policy.</p>

Joe Baker	WR3s, WR3t	<p>I would like to express my support for the charitable Trust in their efforts to raise money from the development of this site.</p> <p>The Tilehurst Poor's Land Trust is a very good landlord and are not threatening the cultivated land.</p> <p>The woodland is inaccessible to people, being overgrown and unmanaged. Thus, the woodland provides no benefit to the community.</p> <p>Our community needs more affordable housing. This small area should be developed to provide benefits for the TPLC and residents.</p> <p>At the present time, the woodland is unmanaged overgrown, intimidating to any who may enter it and probably dangerous.</p> <p>I wholeheartedly support the TPLC in their plan to sell the land for development.</p> <p>Sadly, there is an atmosphere of antagonism expressed by the allotment tenants towards the landlord. I know no reason behind this antagonism. It seems completely unwarranted. Although I have witnessed it myself at meetings of the Tilehurst Allotments Association.</p> <p>It is a privilege to be able to rent an allotment. Not a right. And the woodland area adds nothing to the enjoyment of the, very large, area being cultivated.</p> <p>I would gladly give up my allotment to allow the building of affordable homes in the area. But I am not even being asked to give up my allotment. I am not even being asked to give up use of the woodland, because no-one can use the woodland. The woodland is an overgrown, intimidating mess.</p> <p>I think I have said enough.</p>	Noted. No change required.
Julia Waters	WR3s, WR3t	<p>All of the land at Kentwood Hill and at Armour Hill (WR3s and WR3t) undoubtedly qualifies as Local Green Space on the same grounds as the already designated areas (the Withies, an additional 0.46ha of WR3s, the allotments and Victoria Rec). The land satisfies the LGS criteria, since "it is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance because (in particular) of the richness of its wildlife; and it is local in character and is not an extensive tract of land." The local community has demonstrated the special value that the entirety of the land holds for them by joining the Keep Kentwood Green local action</p>	Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity. Any

		<p>group (659 members of the Facebook group alone) and support of its activities, by signing the petition against the development of the land (over 1000 signatures in a month), by attending a public meeting to oppose the development of the land, by submitting comments to the original Local Plan, and by petitioning our local councillors and MP. None of these local residents has, as far as I am aware, ever distinguished between different sections of what is already a small site when asserting its local significance. To divide the land up in the way proposed in the Partial Update would have a detrimental effect on the biodiversity of the whole area, on the visual integrity of the site (as part of the West Reading Wooded Ridgeline) and goes against the expressed preferences of the local community. I believe that according LGS status to just a small additional part of the land (0.46ha) is environmentally unsound, because it fragments an already small but thriving wildlife refuge that is unique in an otherwise largely built-up urban area.</p> <p>The entirety of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) also already meets the criteria for being classed a Local Wildlife Site, based on evidence - wildlife camera footage, echolocator, audio and photographic recordings - gathered from across the whole area and verified by Thames Valley Environmental Records Centre (TVERC) and by RBC's own ecologist. The only reason that LWS designation has not already been granted for all of the land is because the Trustees of the Charity that owns the land will not grant access for an independent ecology survey to be carried out. It is thus unsound reasoning for RBC to accord LGS status only to the area identified as of 'greatest importance for wildlife' by the Charity's ecologist. The entirety of WR3s and WR3t is of importance for wildlife: without the necessary foraging grounds provided by WR3s and WR3t (plus the allotments, nearby parks and gardens), the value of the land already given LGS status would be greatly diminished. It is also environmentally unsound to accord greater value to one protected species (badgers) over the other 99+ species, including several protected and notable species which live, hunt, forage, nest and root across all of the land, as has been verified by TVERC, based on evidence provided by local residents.</p> <p>It is my informed view that, while the addition of a further 0.46ha of WR3s as LGS is welcome, LGS status should rightly be accorded to the entirety of the land at WR3s and WR3t. There is verified existence of over 100 species of wildlife, including several protected and notable species, living, hunting, nesting and roosting across the entire area and beyond, meaning that it all meets the criteria for designation as a Local Wildlife Site.</p>	<p>further information provided by TVERC will be considered in detail as it emerges.</p> <p>It is important to note that the size of a local campaign is not a planning consideration, rather the purpose of the campaign is to raise planning matters to be considered by decision makers. Public consultation is not intended to tally votes for or against a proposal, but rather to ensure that all factors are taken into view for a balanced decision.</p>
--	--	--	--

		The local community's wish that the entire area be protected, as Local Green Space and a valuable wildlife refuge, has also been amply proven. There are however other compelling reasons why the whole site should be accorded LGS status, beyond the proven presence of rich and varied wildlife and numerous trees, protected by a blanket TPO.	
Kathryn & George Solly	WR3s, WR3t	<p>We would like to add these comments to our previous submission via the official form regarding Kentwood Hill /Armour Hill in Tilehurst:</p> <p>The area under discussion is a wildlife refuge which contains important animal, invertebrate and environmental diversity;</p> <p>It provides a valuable wildlife corridor between it and nearby public parks (Arthur Newbury & McIlroy), gardens, allotments in Armour Hill and Oaktree Road) and open spaces (Tilehurst Recreation Ground);</p> <p>To build on any part of the 'brown or grey' part of the site would be increase the possibility of flooding to housing beneath it on Kentwood Hill due to its considerable elevation and steepness. Additionally, there has been considerable local subsidence in Armour Hill, Armour Hill junction with Westwood Rd and Oaktree Road, Dudley Close / Armour Hill and Westwood Road.</p> <p>In summary, any building on or change to this site would be unsound and detrimental to the local community.</p>	<p>Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity.</p> <p>Run-off rates will be considered in detail at application stage to ensure no effects on surface water flooding in the area. This is detailed within policy EN18.</p>
Katie Jenks	WR3s, WR3t	<p>At the moment, I understand that LGS has been granted to some of the site but not all (at present). As a local resident and also a joint founder of the community group Wild Tilehurst (a BBOWT supported Wilder scheme), I feel that LGS should be granted to all of the land and am aware that it is a proposed Local Wildlife Site - which cannot be confirmed until the owners allow surveys on the land, which is unlikely to happen.</p> <p>The scrub and bramble in the spaces not yet granted LGS are a vital source of protection and food for many animals including migratory birds which use the bramble to nest (E.g. Common Whitethroat, Chiffchaff, Blackcap). Deer, badger, hedgehog, fox and birds use the scrub as a corridor between other areas and also use it to forage. Many of these animals will be dependent on this land for survival. There is also the potential for dormice to be present, as bramble is one of the main nest-supporting shrubs.</p> <p>My opinion is that it is vital to protect such a valuable habitat for wildlife and the community of Tilehurst. Granting the whole land LGS is an opportunity to manage it properly and protect and increase its biodiversity.</p>	<p>Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity. Any further information provided by TVERC will be considered in detail as it emerges.</p>

Keep Kentwood Green	Wr3s, WR3t	<p>We do consider that all the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) should qualify as Local Green Space (LGS). As local residents, we assert that the entirety of the land on Kentwood and Armour Hills (WR3s and WR3t on the Local Plan) is of value to us and should be protected as LGS.</p> <p>While we welcome the redesignation of approximately 0.46ha of WR3s as LGS, on the basis of its importance for wildlife, we assert that the same designation should be granted to the entirety of the land (WR3s and WR3t), for the same reason and because the entirety of the land is demonstrably special as green space to the local community.</p> <p>We believe the reasons given for designating only part of the land as LGS to be unsound, on the following grounds:</p> <ol style="list-style-type: none"> 1) <u>All</u> of the land meets the criteria for LGS designation: it is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance because (in particular) of the richness of its wildlife; and it is local in character and is not an extensive tract of land. 2) In referring to the information provided by the ecologist for the Charity's development partners, RBC Officers have privileged the interested and therefore selective view of the landlord TPLC and their agents, who want to develop the land, over the views of the majority of local residents, who want all the land to be protected as LGS. 3) LGS is defined by Government as "a way to provide special protection against development for green areas of particular importance to local communities" hence one of the criteria for designation is where those spaces are "demonstrably special to the local community". The <i>Keep Kentwood Green</i> Facebook group has over 650 members; a petition against the sale and development of the land gained over 1000 signatures in a month; a public meeting called at short notice to discuss the future of the land was attended by over 120 local residents, all keen to protect the land from development; over 70 responses were received by RBC from members of the public to the Regulation 18 consultation in support of the LGS status compared to the 1 member of public against. The importance of this land to the local community as Local Green Space is overwhelmingly proven. 4) In addition to local residents' direct support for a LGS designation for all of the land, the changes were unanimously approved by their elected representatives at the RBC Strategic Planning Committee in August 2024. At the full Council meeting, the land protection was also supported by all 3 parties, with local councillors speaking in favour on behalf of their wards: indeed, the Liberal Democrats declined to approve the Partial Plan Update purely on the basis that 	<p>Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity. Any further information provided by TVERC will be considered in detail as it emerges.</p> <p>Do not agree. The site at EN7Ww serves an important recreational and leisure role and clearly meets the criteria defined for LGS within the NPPF. It is important to note that the size of a local campaign is not a planning consideration, rather the purpose of the campaign is to raise planning matters to be considered by decision makers. Public consultation is not intended to tally votes for or against a proposal, but rather to ensure that all factors are taken into view for a balanced decision.</p>
---------------------	------------	--	---

		<p>full LGS had not been given to this land. The MP for Reading West and Mid Berkshire is also fully supportive of protecting this land as LGS, based on the expressed views of her constituents.</p> <ol style="list-style-type: none"> 5) In privileging the evidence provided by the landowner's ecologist, RBC have ignored the substantial amount of evidence, submitted by local residents and verified by TVERC, of the presence of rich, diverse wildlife (over 100 different species, including several protected and notable species) across <u>all</u> of the land, not just the 0.46ha deemed to be of greatest importance. 6) RBC have ignored the expert opinions of TVERC, CPRE England, BBOWT, Badgers Trust and the Woodland Trust, all of whom support the designation of the entirety of WR3s and WR3t as LGS and/or Local Wildlife Site. 7) As confirmed by the Badgers Trust and local evidence, badgers forage over a wide area to obtain sufficient food. It is therefore flawed environmental reasoning to suggest that small, fragmented areas of land of the 'greatest importance for wildlife' would suffice to support the diversity of wildlife that lives, hunts, forages and shelters across the entirety of the land on Kentwood and Armour Hills (and the adjoining allotments, nearby parks and private gardens). As protected species, sensitive to human activity, badgers need better protection than that afforded by an additional 0.46ha buffer allocated as LGS. 8) It is also unsound environmental reasoning to favour one protected species (badgers) over the many others, such as bats and birds, which have been regularly sighted (with evidence submitted to TVERC) in and around the builders yard and remaining sections of WR3s and WR3t, where they predominantly nest and roost. 9) We assert that the designation of the builders yard as brownfield land is unsound, given that the various structures there - sheds and lock-ups - are all temporary in nature; none has proper foundations, mains electricity or planning permission. There are veteran trees with TPOs in this area and sightings of numerous animal species. It would be relatively straightforward to rewild this area, to enhance the existing foraging and roosting habitat for wildlife. 10) There is also a striking and, we argue, unsound disparity between the evidence required to justify a LGS designation for WR3s and WR3t, compared with that required for the proposed new LGS designation of the Ibis Sports Club (EN7Ww). EN7Ww are playing fields, privately owned and with no general public access. Only 4 members of the public have written in to support the designation of EN7Ww as LGS, compared with nearly 70 for WR3s and WR3t; nor has there been any campaign of local people or local public meeting. It is hard to see how the "demonstrably special" LGS criterion has been met for EN7Ww, when compared with WR3s and WR3t. Whereas playing fields exist elsewhere in the 	
--	--	---	--

		<p>vicinity of EN7Ww, sites WR3s and WR3t are the only fully protected refuge sites for wildlife in an otherwise largely built-up area.</p> <p>11) Local Wildlife Site designation. On the basis of trail camera, echolocator, audio, photographic and other evidence provided by local residents, both TVERC's Berkshire Biodiversity Officer and RBC's own ecologist agreed in early 2023 that the criteria for WR3s and WR3t being designated as a Local Wildlife Site have been met. TPLC, the landlords, have to date refused TVERC access to the land, to complete the verification process which would confirm its status – and consequent protection - as a Local Wildlife Site.</p> <p>12) The Charity's refusal of access to an independent ecologist also means that no survey of flora has been conducted, meaning there may well be important plant as well as wildlife species across the land. While LWS status would without doubt confirm the significance of the whole area for wildlife and thereby afford protection from development, this should not preclude Local Green Space status being granted in the meantime, in recognition of the land's 'demonstrably special' importance to the local community.</p> <p>All of the land at WR3s and WR3t is demonstrably special to the local community, on the basis of the richness of its wildlife and flora inter alia, and we assert that it should therefore be protected from residential development in its entirety. A representative of <i>Keep Kentwood Green</i> would like to speak, on behalf of the local community and in favour of the LGS designation, at the Public Hearing when the Partial Update of RBC's Local Plan will be debated.</p>	
Lichfields on behalf of Tilehurst People's Local Charity	WR3s, WR3t	<p>Our client considers that the LPPU19's proposed changes to Policy WR3s and WR3t to make the allocations "subject to the site not being identified as a Local Wildlife Site" are wholly unjustified and inconsistent with the NPPF (December 2023) for the reasons set out in these representations – specifically in response to these policies.</p> <p>The wording within the proposed allocation, as drafted in the LPPU19 could constrain or prevent delivery of much needed residential development (including family housing) at sustainable site(s) unnecessarily which is inconsistent with the NPPF (December 2023). This serious concern is compounded by the wider context of the LPPU19 failing to plan for its objectively assessed need.</p>	Do not agree. Although the boundary of the site has been reduced due to its identified biodiversity value, the remainder of the site will still be able to deliver much needed housing, including family housing.
Louise Corderoy	WR3s, WR3t	<p>This area is vital for wildlife and as a 'breathing space' for our world. I wholly support KKG and urge you to listen to their appeals as they will explain far more eloquently than I will how vital it is that we protect our increasingly limited green spaces!</p>	Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have

			identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity
Mr M G Facer and Miss G Davies	WR3s, WR3t	<p>This decision is totally unsound as any development would cause harm to the numerous protected species of wildlife living there.</p> <p>The whole of this land should be granted Local Green Space status, as it all satisfies the criteria for listing as such.</p> <p>Also, the space is probably unsuitable for building on, due to the very real possibility of unstable ground, as evinced by the recent collapses of roads in Westwood Road and Dudley close.</p>	<p>Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity.</p> <p>No evidence of unstable ground has been provided at this time, but this will be considered in detail at such time an application is made.</p>
Mr Mark Hazelton	WR3s, WR3t	<p>The LGS (Local Green Space) status should be given to all of the land as requested and not just the small change to site WR3s. All of the space meets the LGS criteria (in reasonably close proximity to the community it serves; is demonstrably special to a local community and holds a particular local significance because of the richness of its wildlife; and is local in character and is not an extensive tract of land)</p> <p>I feel it is unsound of RBC Officers to take the view of the landlord TPLC and their agents who want to develop the land when LGS is about allowing local communities to protect green space that's important to them</p> <p>It ignores all the evidence submitted of the variety of wildlife found across all of the land (over a 100 different species) and expert opinions from CPRE England, BBOWT, Badgers Trust and Rural England</p>	<p>Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity. Any further information provided by TVERC will be considered in detail as it emerges.</p>

		<p>All of the land is vital to support the wildlife for hunting, breeding, foraging and refuge so it's flawed environmental reasoning to suggest that small areas of land of 'greatest importance for wildlife' would not be adversely affected by development of broader hunting, foraging grounds. Some species - bats and birds - identified predominantly in skies around the builders yard and on Armour Hill</p> <p>There is also a stark contrast between what is expected to be provided for granting LGS designation to these sites compared to that of previous designations (like the Victoria Rec and the allotments) and the new additional proposed LGS in this partial plan update of the Ibis Sports Club (a private club with playing fields adjacent to RBC owned Rivermead centre</p> <p>The site adjacent to Kentwood Hill/Armour Road is an important local green space that provides refuge to disappearing English wildlife, and should be classed as LGS not suitable for residential development.</p> <p>The LGS (Local Green Space) status should be given to all of the land as requested and not just the small change to site WR3s. All of the space meets the LGS criteria (in reasonably close proximity to the community it serves; is demonstrably special to a local community and holds a particular local significance because of the richness of its wildlife; and is local in character and is not an extensive tract of land)</p> <p>It is unsound of RBC Officers to take the view of the landlord TPLC and their agents who want to develop the land when LGS is about allowing local communities to protect green space that's important to them</p> <p>RBC must consider the evidence submitted of the variety of wildlife found across all of the land (over a 100 different species) and expert opinions from CPRE England, BBOWT, Badgers Trust and Rural England. The site owners are not allowing a separate wildlife audit.</p>	<p>Do not agree. The site at EN7Ww serves an important recreational and leisure role and clearly meets the criteria defined for LGS within the NPPF. Each LGS is assessed on its own merits according to the criteria within the NPPF and can be found in the evidence base. It is important to note that the size of a local campaign is not a planning consideration, rather the purpose of the campaign is to raise planning matters to be considered by decision makers. Public consultation is not intended to tally votes for or against a proposal, but rather to ensure that all factors are taken into view for a balanced decision.</p>
Mrs Carolyn Ribbons	WR3s, WR3t	<p>As a local resident, I feel strongly that the designation of only part of the land at Kentwood Hill /Armour Hill as Local Green Space is unsound. I feel all of it should be included. If The Local 'so called ' charity are allowed to build on this land, we will lose the allotments and parking in Armour Hill , as recently illustrated when Dudley Close was closed, will be</p>	<p>Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of</p>

		<p>an absolute nightmare. The road is too narrow . In addition, the wildlife will be lost (the charity at present refuse access for a survey but as an allotment holder, I see and have evidence of much wildlife in this area. It would be lost forever.</p>	<p>greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity.</p> <p>Any impact of parking or road safety is best addressed by other policies within the plan and will be assessed in detail at such time an application is made.</p>
Mrs Cynthia Oben	WR3s, WR3t	<p>The LGS ,needs to be left as it is ,it is an area that has existed for years, the local community benefits from it ,eg allotments, which also has wildlife that we see daily as we walk through the spaces, please save the area for the kentwood area.</p> <p>The allotment to me has been therapeutic and help with wellbeing for all of people in the area.</p> <p>Am a strong supporter of KKG.</p>	<p>Noted, but not change proposed. The allocation seeks to strike a balance between preserving areas of wildlife and providing much needed housing, including affordable and family housing.</p>
Mrs Rebecca Lagden	WR3s, WR3t	<p>I believe the Council's designation of only part of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) as Local Green Space is unsound. As a local resident, I believe that ALL the land should be granted Local Green Space status as it all satisfies the criteria.</p> <p>There are a number of flora and fauna who depend on this land for survival and many residents feel the same.</p> <p>As our council you are responsible for protecting these areas for the wildlife and for future generations. Once lost it will not return.</p>	<p>Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity.</p>
Sarah Latcham	WR3s, WR3t	<p>I believe that the Council's designation of only part of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) as Local Green space is unsound. All of this land should be granted Local Green Space as it all satisfies the criteria.</p> <p>In addition, all of the evidence submitted on the variety of wildlife across this land seems to have been ignored. All of the land is vital to support this wildlife for hunting breeding, foraging and refuge.</p>	<p>Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including</p>

		Finally, I feel that it unsound of RBC Officers to take the view of the landlord TPLC and their agents, who want to develop the land when LGS is about local people protecting the green space that is important to them.	affordable housing and family housing, while protecting biodiversity.
Stan Gamester	WR3s, WR3t	<p>I am responding to your development proposals for area WR3s and WR3t on your map, the areas between Kentwood Hill and Armour Road. I am a resident of Tilehurst and have always been concerned about the quality of the environment around me and as a keen gardener know the importance of biodiversity.</p> <p>The two areas referred to have long been known as rich in flora and fauna. Although once allotments the land has been left to nature for at least three decades and has become a home for wildlife. This is rare in an urban neighbourhood. Many species of animal have been identified there and recognised as significant by CPRE England, the Badgers Trust, Rural England and BBOWt.</p> <p>Portioning the land into possible development sites either side of a patch that is designated Local Green Space and of Biodiversity Interest would, if realised, essentially kill the isolated LGS since the ecosystem and the corridor that supports it will have been turned into tarmac and brick. Animals would have very little room to roam and forage. Wildlife is dependent on land for insects, vegetation and a place to live. Parcelling the land up into ever smaller patches will endanger and possibly kill off that wildlife. It would seem this factor has been ignored in the planning process.</p> <p>Therefore, to preserve the LGS and its biodiversity the whole area including WR3s, WR3t should be retained as wild green space. This would fit with another of the Council's much praised positions of being on a Climate Action A list. It also has an aspiration to giving its residents a "Healthy Environment" and "where people feel the benefits of clean air". Green spaces help to filter, oxygenate and cool air, much needed in an era of climate and environmental crisis.</p> <p>Please revise the plan to suit the needs and interests of the people who actually live there now, recognise our wishes in that neighbourhood and leave the land to nature.</p>	Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity.
Steve Hicks	WR3s, WR3t	<p>As regards the Partial Update to the Local Plan (Regulation 19), in response to questions 15 and 75, I believe the Council's designation of only part of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) as Local Green Space is unsound.</p> <p>For the reasons set out in my letter of 30/01/2024 and sent again by email yesterday I believe that ALL the land should be granted Local Green Space status.</p>	Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of

		This is because it satisfies all the qualifying criteria and is the only way to ensure all the valid reasons for protecting the habitat and valuable green space can be ensured.	much need housing, including affordable housing and family housing, while protecting biodiversity. For detailed comments on the letter sent 30/01/2024, please see the Reg 18 Statement of Consultation.
Tanya Talbot-Butler	WR3s, WR3t	<p>In response to Questions 15 and 75, I believe that the Council's designation of only part of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) as Local Green Space is unsound. As a local resident I believe that all the land should be granted Local Green Space status as it satisfies the criteria.</p> <ul style="list-style-type: none"> • It is in reasonably close proximity to the community it serves • It is demonstrably special to a local community and holds a particular local significance because of the richness of its wildlife (badgers, deer, foxes, hedgehogs, bats, etc. all seen within the area) • It is local in character • It is not an extensive tract of land. <p>Suggesting that small areas of land of 'greatest importance to wildlife' would not be adversely affected by the development of broader hunting and foraging grounds is not environmentally sound reasoning.</p> <p>We should be protecting the remaining green space and support what wildlife we have left in this district otherwise we will wind up as another barren London suburb.</p>	Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity.
Trevor and Alison Hayes	WR3s, WR3t	This has been an open space for many years and should remain so. I believe the Council's designation of only part of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) as Local Green Space is unacceptable for many reasons. ALL the land should be granted Local Green Space status as it satisfies the criteria and is an important space for wild life the environment and the community. There are not enough green spaces in Tilehurst as it stands.	Do not agree. No change proposed. Detailed evidence provided by ecologists monitoring the site have identified the 0.46 ha area now included as LGS as the area of greatest importance for wildlife. This approach will allow for the delivery of much need housing, including affordable housing and family housing, while protecting biodiversity.

Lichfields on behalf of Tilehurst People's Local Charity	WR3t	<p>The LPPU19 proposes changes to Policy WR3t (Land at Armour Hill) which are similar to those amendments proposed to Policy WR3s (Land at Kentwood Hill discussed previously). We note LPPU19 Policy WR3t requires no “reduction of the allotments themselves as a result of the development” and our client does not raise any concerns with this.</p> <p>The key difference within LPPU19 Policy WR3t is that the LPPU19 reduces the quantum of development to 10-14 dwellings, from 12-18 dwellings (as per the adopted local plan).</p> <p>The LPPU19 Policy WR3t states a site area of 0.45ha which is the same as that in the adopted local plan. The HELAA informs the proposed quantum of development stated in the LPPU19 Policy WR3t and explains that the reduced quantum of development results from consideration of perceived constraints at the site, including those related to ecology.</p> <p>However the HELAA applies its consideration of constraints to a site area of 0.41 ha, without explaining why a smaller area is used to that in the adopted plan, and stated within LPPU19 Policy WR3t. It is possible that using a greater site area of 0.45 ha would allow the assumed quantum of development to be higher.</p> <p>Our client considers that the potential quantum of residential capacity should be reassessed on the basis of the 0.45 site area – although ultimately the appropriate capacity of the site will evolve through the planning application process.</p> <p>Our responses to Policy WR3s, apart from those relating to “area of identified biodiversity interest” and LGS designation, are equally applicable to Policy WR3t. Please refer to our response to Policy WR3t for our detailed analysis of the reasons the policy is not sound.</p>	No change proposed. The site as proposed to be allocated and as was considered in the HELAA has been remeasured and it is 0.41 ha in size. The extent of the adopted allocation has also been remeasured and is also 0.41 ha. It is not clear why the adopted Local Plan says 0.45 ha, but this appears to have been an error.
Environment Agency	WR3u	Please note that for each of these sites, the site itself is mapped as being within flood zone 1. However, there are unmodelled Ordinary Watercourses (OWCs) in the vicinity of these sites and therefore a FRA will be required as the allocations will increase the vulnerability of the sites, and flood risk from the OWCs will need to be assessed. At planning application stage each respective applicant is likely to need to carry out detailed flood modelling themselves. This should also be considered within the Level 2 SFRA.	Noted. This will be addressed at planning application stage. The site is covered by a Level 2 SFRA due mainly to the extent of assessed surface water flooding.
Thames Water	WR3u	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment	Noted. No change required.

		stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	
Environment Agency	WR3v	<p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Desk study and some form of site investigation at a minimum required here owing to unknown former uses. The policy does not refer to addressing contamination.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>The Council's records do not indicate any identified contaminated land issue on this site.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Thames Water	WR3v	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Noted. No change required.
Martin Robeson Planning Practice on behalf of Tesco Stores Ltd	WR3w	<p>It is first relevant to note that the draft Plan, as well as recently revised national planning policy, recognises the scale of the housing need faced by the Borough and the need for land to be identified within the Borough to meet this need. Further, there is specific support for the use of brownfield and under-utilised land to meet these needs (e.g. at paragraph 125 of the NPPF). For this reason, the allocation of the surplus car parking land at Tesco, Portman Road is supported.</p> <p>However, in light of the clearly evidenced need for housing and density, it is considered that the dwelling range of 46-68 dwellings set out within the draft allocation is insufficient.</p>	<p>Noted.</p> <p>The dwelling range is indicative and it may be possible to demonstrate a higher number of dwellings can be accommodated at application stage.</p> <p>The HELAA needs to anticipate potential issues and reflect this in a</p>

		<p>It is understood that the HELAA's calculation of dwelling numbers has reduced the site size to allow for a buffer to Tesco's servicing access. This would be a matter to be assessed within the planning application, and should not serve to set an unreasonable 'cap' on the amount of development that can be delivered on the site. Certainly, given the site's nature as an under-utilised brownfield site in a very accessible location, delivery of only 46 dwellings would be unsatisfactory. It should further be noted that the planning application that is presently waiting to be determined was submitted on the basis of delivering 80 dwellings (with 35% affordable), albeit that the site layout is presently under discussions with development management officers.</p> <p>Further to this, Figure 10.1 of the draft Plan sets out indicative timescale for delivery of its allocations, and WR3w is denoted for the medium term (2028-33). The site is under single, freehold ownership and is the subject of a planning application that is awaiting determination by the Local Authority. On this basis, and given the aforementioned acute need for housing sites to be identified, the site is capable of delivering residential units within the short term (first five years of the plan period).</p> <p>In terms of the allocation criteria imposed, it is not considered that extension and/or bifurcation of the Buzz18 bus route would be necessary to make the development acceptable, and it may not necessarily be the most preferred way to ensure that any impacts of the development are mitigated. The site is in a particularly accessible location, both in terms of public transport and facilities available within walking distance, and thus this overly restrictive criterion should be deleted.</p> <p>Finally, the access arrangements are subject to ongoing discussions between the developer and the Local Authority, and are a matter to be considered in the assessment of a planning application. This criterion provides an overly prescriptive and unnecessary restriction to development that would come forward at this site, and should therefore be removed.</p>	<p>robust and realistic calculation of capacity, even if the detail of matters such as servicing access needs to be addressed at application stage.</p> <p>The timeline is noted, but in general terms, in line with the approach to 5 year housing land supply, it is difficult to assume delivery within the short term (2023-2028) where there is no permission in place.</p> <p>The Buzz 18 bus route has substantially increased public transport accessibility along the corridor on which this site sits, and the improvement of this route is identified as an improvement scheme in the Sustainable Connectivity and Vehicle Trip Distribution Study.</p> <p>It is not agreed that the access references should be removed, as the alternative would involve creation of a new access on a classified road or use of the service access. It would be for a planning application to demonstrate that an alternative arrangement is appropriate.</p>
Ridgepoint Homes	WR3w	<p>The inclusion of the site as a draft allocation is welcomed however as noted above, the current full planning application is based on a scheme of 80 apartments. Whilst an amendment to the scheme is currently being negotiated, in the interest of making the most efficient and effective use of a brownfield site as required by national planning policy, it is considered that the site should be capable of accommodating more units than the minimum of 46 units as stated in the draft allocation.</p> <p>In light of the sustainable location of the site which is well connection to the local bus network and the fact that this request has not been raised as part of the current full planning application, it is considered that the requirement to contribute towards an</p>	<p>Noted.</p> <p>The dwelling range is indicative and it may be possible to demonstrate a higher number of dwellings can be accommodated at application stage.</p> <p>The Buzz 18 bus route has substantially increased public transport accessibility along the corridor on</p>

		<p>extension and bifurcation of the BUZZ18 bus route is not necessary to make the development in acceptable in planning terms and this requirement should be deleted from WR3w.</p> <p>The scheme submitted pursuant to the pending full planning application proposes access to the residential development from the western site boundary and not through the existing Tesco car park. This arrangement seeks to separate traffic associated with the Tesco store and the residential parcel in the interest of enhancing the living environment for future residents and to avoid conflicts between residential and retail traffic. The proposed access from the western boundary has been assessed and designed by professional highways engineers to ensure that the proposed arrangements are safe and adhere to the required standards. This requirement should therefore be deleted from WR3w.</p> <p>The Draft Partial Local Plan Update states that the site area is 0.59ha. As noted in relation to the Background to the site, an amendment to the current planning application is being negotiated based on a revised application boundary reflective of the Site Boundary Plan appended to this letter. The resultant site area would be 0.6 ha and WR3w should therefore be updated to reflect this.</p> <p>The site location is shown on Sheet C and Oxford Road West Inset of the Proposals Map. However, the Partial Update Map has not been updated to show the site allocation as would be denoted by grey shading (extract of the site as shown on the draft Oxford Road West Inset below). The Proposals Map should therefore be updated to denote the site allocation, reflective of the Site Boundary Plan appended to this letter.</p> <p>Figure 10.1 of the Local Plan Partial Update Pre-Submission Draft sets out the overall timescales for site proposals to be delivered. Site WR3w is expected to be delivered in the medium term (2028 – 2033). As a full planning application is currently pending determination and the site is under single ownership with a legal option for the sale of the land, there are no constraints to the delivery of the site. It is therefore considered that the site is deliverable in the short term and Figure 10.1 should be updated to reflect this.</p>	<p>which this site sits, and the improvement of this route is identified as an improvement scheme in the Sustainable Connectivity and Vehicle Trip Distribution Study.</p> <p>It is not agreed that the access references should be removed, as the alternative would involve creation of a new access on a classified road or use of the service access. It would be for a planning application to demonstrate that an alternative arrangement is appropriate.</p> <p>It is agreed that the site should be shown on the Oxford Road West inset. This was an error and would need to be covered in a main modification.</p> <p>The timeline is noted, but in general terms, in line with the approach to 5 year housing land supply, it is difficult to assume delivery within the short term (2023-2028) where there is no permission in place.</p>
Thames Water	WR3w	<p>Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination</p>	Noted. No change required.

		for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided modelling may be required to understand the impact of development.	
Thames Water	WR3x	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Noted. No change required.
Environment Agency	WR3y	<p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Desk study and some form of site investigation at a minimum is required here owing to unknown former uses. The policy does not refer to addressing contamination.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>The Council's records do not indicate any identified contaminated land issue on this site.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Thames Water	WR3y	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Noted. No change required.

Kidmore End Parish Council	Section 8: Caversham and Emmer Green	<p>The Council supports 8.2.1c, proposed mobility hub capacity on A4155, A4074 and B481, and 8.2.1e which aims at preserving areas of landscape, including the edge of the Chilterns National Landscape.</p> <p>On 8.2.5, the Council acknowledges that Caversham does not possess adequate infrastructure to support additional development, particularly regarding transport, education and healthcare. The Council does not agree with the wording of your Council's policy, which does not reflect the current opinions of councils north of Reading.</p>	<p>Noted. No change required.</p> <p>Noted. No change proposed. RBC's intention to work towards an additional crossing have been made clear and the Council will continue to work constructively with its neighbours.</p>
The Warren and District Residents Association (WADRA)	Section 8: Caversham and Emmer Green	<p>We note that in Section 8.2, Strategy for Caversham and Emmer Green, the document states that there will be enhanced pedestrian and cycle links between Caversham and Reading town Centre, but no details have provided for these routes. This section also states that a mobility hub (park and ride) will be sought on the A4074, but no possible location, or timescale has been provided for this facility.</p> <p>We note in clause 8.2.1.d that the document states the Council will continue to work with neighbouring authorities towards the provision of a crossing of the Thames east of Reading, but no location or timescale has been given for this crossing in the document.</p>	<p>It is not within the scope of the Local Plan to provide detailed plans for enhanced pedestrian and cycle links. Any improvements will be pursued through the Local Transport Plan and the Local Plan is drafted in order to enable planning officers the opportunity to improve routes as applications arise in the area. A site for a mobility hub on the A4074 has not yet been identified.</p> <p>RBC's intention to work towards an additional crossing have been made clear and the Council will continue to work constructively with its neighbours. A location or timescale has not been identified at this time.</p>
Wokingham Borough Council	Section 8: Caversham and Emmer Green Para 8.2.1	<p>WBC supports Paragraph 8.2.1 which states RBC will continue to work with other local authorities towards the provision of a crossing of the River Thames, east of Reading. To realise air quality goals, RBC acknowledge this will require mitigation on the road network on either side of the crossing. WBC continue to work with RBC on this Major Road Network (MRN) improvement but note that if achieved it will ultimately link the M4, A329(M), A3290 and A4155, supporting some redistribution of traffic in the wider area. Through the preparation of the Wokingham Borough Council Local Plan Update Proposed Submission Plan, WBC note that several parts of the local highway network are likely to require complementary improvements into the 2030's. If the Thames Crossing is delivered other improvements will be necessary in Wokingham Borough to support these plans affecting the eastern (A4) corridor.</p>	<p>Noted. No change required.</p>

The Warren and District Residents Association (WADRA)	CA1	<p>Page 245 at 8.3.5 refers to Chazey Farm, the Warren and to the possible development of a 78 bed nursing home at this location. The listed buildings at this site must be preserved at all times should this development proceed sometime in the future. Additionally access for construction vehicles etc. would need to be improved in the interests of safety.</p>	Noted. This will be best addressed by EN1. Access for vehicles and road safety will be considered at such time an application is made.
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	CA1	<p>Several small major development sites are identified and the ICB considers that they will continue to have additional pressure to the existing primary healthcare provision in the local area.</p> <p>Any residential developments identified in this Policy are expected to make financial contributions to either support any estates projects within the existing GP practices in Caversham and Emmer Green area to provide additional clinical capacity. Relevant wording should be included in the Policy. The ICB has the following suggestions to Policy CR1:</p> <p><i>CA1: SITES FOR DEVELOPMENT IN CAVERSHAM AND EMMER GREEN</i></p> <p><i>The following sites will be developed according with the principles set out in this policy:</i></p> <p><i>All allocated sites within this Policy are expected to make financial contributions towards primary healthcare supporting any estates projects within the existing GP practices in Caversham and Emmer Green to provide additional clinical capacity.</i></p> <p><i>Developers must engage with NHS Buckinghamshire, Oxfordshire, and Berkshire Integrated Care Board (BOB-ICB) or such appropriate body at an early stage if it is intending to include primary healthcare as one of the potential community uses of the site. Developers are expected to carry out a pre-project work at their own expenses to work out the detailed specification of the provision. Any onsite provision must refer to Policy OU1A of this document. Subject to the agreement with BOB-ICB, any primary care mitigations including but not limited to an onsite provision or an offsite mitigation, will be secured through planning obligations.</i></p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	It is unclear what additional benefit this would bring as financial contributions are best addressed through CC9.
Environment Agency	CA1a	<p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to accommodate further growth in Reading.</p> <p>Sequential test is required.</p>	Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be

		<p>It would not be feasible to compensate the loss of floodplain storage any increase in built footprint the proposed development would bring. This is contrary to policy EN18. This site must be included in the Level 2 SFRA and the exception test must be passed.</p> <p>A Water cycle study must be produced to take account of discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.</p>	<p>monitored closely and considered in detail at application stage.</p> <p>A sequential test and exception test has been undertaken.</p> <p>This site has been included in the Level 2 SFRA. This concluded that a residential development would face a number of challenges, but the allocation restricts development to the parts of the site in Flood Zone 3 only which should be possible to accommodate.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
University of Reading	CA1a	The University supports the continued inclusion of CA1a Reading University Boat Club, Thames Promenade as an allocation for residential development. The University does not object to the amended wording. The proposed amendments to policy CA1a are supported and the policy is considered to be sound.	Noted. No change required.
Historic England	CA1c	We welcome the proposed changes to this policy. For extra clarity, we recommend flagging that Caversham Park is a Registered Park and Garden	It is unclear what additional benefit this would bring and is best addressed by EN1.
The Warren and District Residents Association (WADRA)	CA1f	As the only access to this area of land is from the A4074 via Symeon Place, measures should be incorporated into the plan in the interests of road safety, at this location.	This will be a matter to be considered in detail at planning application stage.
Caversham and District Residents Association	CA1f	This area has the potential to impact the Chilterns escarpment and the views across the Thames from Thames Prom. Additional conditions should be included to protect the green canopy and views from the Prom. This is necessary to comply with policies EN13 and EN14 as well as EN1 as set out in more detail for St Peters Conservation Area.	It is unclear what additional benefit this would bring as it is best addressed through EN1, EN3 and EN13.
Thames Water	CA1h	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of	Noted. No change required.

		the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	
The Warren and District Residents Association (WADRA)	CA1h	The draft states that if this site is not required for a school, a change of use and development for residential purposes is possible. We would recommend this site be retained for educational use only.	The site will only be permitted for residential use if there is sufficient evidence to demonstrate that education use is no longer required. An alternative is a vacant building, which is not considered to be appropriate.
Caversham and District Residents Association	CA1h	<p>This site is the subject of a Local Listing Application which has still to be presented to the Planning Applications Committee. The school buildings are important for their architectural heritage and also for their significance for girls' education and for local history. Please see the Local Listing application for more detail - see EN1 and EN4.</p> <p>Large areas of the site are wooded so there is significance for habitat and biodiversity as well as for individual trees – see EN 12 and EN 14. The condition should be expanded to reflect this.</p> <p>There is a severe shortage of educational places for SEN and this site provides a rare opportunity which would be hard to replicate elsewhere. A condition should therefore be added giving explicit priority for educational use, in line with OU1. Educational use should be fully explored before other plans are considered.</p>	<p>Noted. No change required.</p> <p>It is unclear what additional benefit this would bring as it is best addressed through EN12 and EN14.</p> <p>Noted. No change required. The policy clearly states that residential use would only be acceptable where education use was no longer needed.</p>
Environment Agency	CA2	Please note that for each of these sites, the site itself is mapped as being within flood zone 1. However, there are unmodelled Ordinary Watercourses (OWCs) in the vicinity of these sites and therefore a FRA will be required as the allocations will increase the vulnerability of the sites, and flood risk from the OWCs will need to be assessed. At planning application stage each respective applicant is likely to need to carry out detailed flood modelling themselves. This should also be considered within the Level 2 SFRA.	This site has secured a resolution to grant permission subject to Section 106 agreement, and relevant flood risk issues were dealt with through that process. This policy is not proposed to be updated.
NHS Buckinghamshire, Oxfordshire and	CA2	The ICB notes that the site will deliver up to 40 to 45 dwellings and they will continue to have additional pressure to the existing primary healthcare provision in the local area.	It is unclear what additional benefit this would bring as financial contributions are best addressed through CC9.

Berkshire West Integrated Care Board		<p>Any residential developments within Caversham Parks are expected to make financial contributions to either support any estates projects within the existing GP practices in Caversham and Emmer Green area to provide additional clinical capacity. Relevant wording should be included in the Policy. The ICB has the following suggestions to Policy CA2:</p> <p>CA2: CAVERSHAM PARK</p> <p><i>The following sites will be developed according with the principles set out in this policy:</i></p> <p><i>Conversion of the house from offices to residential and/or a cultural, community or heritage use, or other suitable use compatible with its heritage, will be acceptable if it sustains the significance of the listed building. It is currently estimated that up to 40-45 dwellings could be accommodated, but the figure will be dependent on more detailed historic assessment of the building and the precise mix of uses.</i></p> <p><i>All allocated sites within this Policy are expected to make financial contributions towards primary healthcare supporting any estates projects within the existing GP practices in Caversham and Emmer Green to provide additional clinical capacity.</i></p> <p><i>Developers must engage with NHS Buckinghamshire, Oxfordshire, and Berkshire Integrated Care Board (BOB-ICB) or such appropriate body at an early stage if it is intending to include primary healthcare as one of the potential community uses of the site. Developers are expected to carry out a pre-project work at their own expenses to work out the detailed specification of the provision. Any onsite provision must refer to Policy OU1A of this document. Subject to the agreement with BOB-ICB, any primary care mitigations including but not limited to an onsite provision or an offsite mitigation, will be secured through planning obligations.</i></p> <p>Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.</p>	
Environment Agency	Section 9: East Reading	<p>We do not consider all sites within the East Reading allocations in the local plan to be deliverable and developable. This is because;</p> <ul style="list-style-type: none"> - of the lack of a sequential test to support the site allocations and selection, the Level 1 SFRA and Local Plan partial update in general. - of the lack of evidence of a suitable assessment of capacity for foul water/wastewater from all proposed developments in Reading to be adequately treated at Reading Sewage Treatment Works (STW). 	<p>Thames Water is aware of the need for upgrades to accommodate further growth and capacity will continue to be monitored closely and considered in detail at application stage.</p> <p>A sequential test has been undertaken.</p>

		<p>In summary we do not consider these sites to be deliverable due to a number of constraints and therefore the allocations and site policies do not meet NPPF section 14 and 15 requirements. We therefore find the plan to be unsound as it is not justified, effective and consistent with national policy.</p> <p>For clarity, the above issues refer to all sites within the East Reading allocations, however we do not have any additional comments relating to individual sites.</p> <p>A water cycle study is required to provide evidence that there is suitable capacity for foul water treatment of Reading STW.</p>	<p>This site has been included in the Level 2 SFRA.</p> <p>The Water Quality Assessment forms part of the submission background evidence.</p>
Historic England	Section 9: East Reading	<p>This reference should be tightened to clarify that this refers to historic parks and gardens on the Register maintained by Historic England, rather than other historic parks and gardens not on that register. I have added an explanatory sentence in the suggested wording, in case that is useful.</p>	<p>It is unclear from the representation where this suggested wording is best placed.</p>
Environment Agency	ER1	<p>Paragraph 9.3.6 details that the site at 9 Upper Crown Street already has planning permission (resolved to grant permission subject to signing of S106 agreement). We have been unable to locate any evidence that we have been consulted on this application. Our findings from our constraints screening of the site is that with regards to contaminated land, a desk study and some form of site investigation at a minimum are required here owing to unknown former uses, and the location of the site is upon secondary superficial aquifer A, secondary bedrock aquifer A. Therefore, we would highlight that any permission or inclusion of the site within the Local Plan will need to ensure that any contamination at this site is addressed.</p>	<p>This is not within the scope of the Local Plan, particularly since planning permission has already been granted.</p>
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	ER1	<p>Several small major development sites are identified and the ICB considers that they will continue to have additional pressure to the existing primary healthcare provision in the local area.</p> <p>Any residential developments identified in this Policy are expected to make financial contributions to either support any estates projects within the existing GP practices in East Reading area to provide additional clinical capacity. Relevant wording should be included in the Policy. The ICB has the following suggestions to Policy ER1:</p> <p><i>ER1: SITES FOR DEVELOPMENT IN EAST READING</i></p> <p><i>The following sites will be developed according with the principles set out in this policy:</i></p>	<p>It is unclear what additional benefit this would bring as financial contributions are best addressed through CC9.</p>

		<i>All allocated sites within this Policy are expected to make financial contributions towards primary healthcare supporting any estates projects within the existing GP practices in East Reading to provide additional clinical capacity.</i>	
University of Reading	ER1c	The University supports the continued inclusion of ER1c Land Rear of 8-26 Redlands Road as an allocation for residential development with potential for student accommodation.	Noted. No change required.
University of Reading	ER1e	The University supports the continued inclusion of ER1e St Patrick's Hall, Northcourt Avenue as an allocation for student accommodation.	Noted. No change required.
Historic England	ER1i	For complete clarity we suggest using the phrase "Registered Park and Garden" to align with the NPPF.	Change proposed.
Thames Water	ER1l	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Noted. No change required.
Thames Water	ER1m	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Noted. No change required.
Thames Water	ER1n	Network Waste RAG Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s. STW RAG Assessment - Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment	Noted. No change required.

		stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat. Our final funding determination for the next five-year period is due on 19th Dec 2024. Network Waste Assessment - On the information provided we do not envisage infrastructure concerns in relation to this development/s	
Berkshire Gardens Trust	ER2	<p>We are in support of policy ER2: Whiteknights Campus, University of Reading (Strategic Policy) but reiterate the need to include</p> <ul style="list-style-type: none"> <i>Development will accord with the following criteria:</i> The conservation and enhancement of the historic non-designated but locally important parks and gardens at Whiteknights which extend into Wokingham Borough Council. <p>[That part of Whiteknights in Wokingham is already locally listed]</p>	Whilst the Council agrees that there is a need to retain the overall character of the campus, and conserve and enhance those areas of greatest significance, the concern would be that the wording as proposed would be inflexible and would not give sufficient flexibility for important university-related development to take place which may include use of greenfield land in some instances.
Historic England	ER2	Acknowledging the listed buildings within the site and the connection of the site to a wider historic landscape, we recommend referring to the historic environment in the policy. We suggest wording for consideration.	It is unclear what additional benefit this would bring as it is best addressed by policy EN1.
Sport England	ER2	Sport England is supportive of the principles of this policy but would seek to have clear justification for any new sports facilities and would seek to have them accessible by the local community, via a community use condition.	This is not within the scope of the Local Plan.
University of Reading	ER2	<p>The University supports strategic policy ER2 relating to its Whiteknights Campus. The University strongly supports and welcomes the continued inclusion of a policy for Whiteknights campus which will continue to be a focus for development associated with the University of Reading. The University welcomes the proposed updates to policy ER2 and supporting text to reflect the University's current plans and strategy. The University's needs and objectives are constantly evolving, and it is important that the planning policy for Whiteknights Campus reflects this.</p> <p>Whilst the University considers the policy to be sound, it seeks a minor amendment to Paragraph 9.3.10 to acknowledge that there are likely to be changing circumstances and priorities for the University which may lead to the need for additional new built development in the medium to longer term, and the Local Plan time horizon is longer than its 10 year Estate Strategy, which it likely to be reviewed prior to the end of the Local Plan period. The supporting text to policy ER2 should reflect that the University's priorities and plans will change in the medium and long term as set out above. However, the University</p>	<p>Noted. No change required.</p> <p>It is not considered necessary to highlight elements of an unknown estate strategy. Any changes would be accounted for during the five-yearly review of the Local Plan.</p>

		is satisfied that the proposed wording of policy ER2 provides sufficient flexibility with regards to University related development on the Whiteknights Campus, including specific reference to student accommodation being acceptable on the campus.	
Wokingham Borough Council	ER2	WBC supports Policy ER2 Whiteknights Campus University of Reading. With the Whiteknights Campus straddling the administrative boundary, we are pleased to note it broadly aligns with Policy SS9 Whiteknights Campus of the Wokingham Borough Council Local Plan Update Proposed Submission Plan.	Noted. No change required.
Mark Drukker	ER3	Royal Berks Hospital has site problems. The current Royal Berks Hospital suffers from subsidence due to the chalk mines below.	Noted. No change required. This is not within the scope of the Local Plan and the decision to relocate the Hospital or remain onsite is not within the powers of the Council.
Sport England	Section 10: Implementation Para 10.2	Sport England is very supportive of RBC's desire for the updating and improving Reading's indoor and outdoor sports provision. However, this need to be done by having a robust evidence basis such as a built facilities strategy, (BFS) and playing pitch strategy, (PPS). The current Reading PPS is coming to the end of its life, whereas there is no BFS. Once these strategies are in place they need to be kept up to date, unlike what has happened with the current PPS.	This is not fully within the scope of the Partial Update, but Reading's Playing Pitch Strategy dates from 2021 and covers the period to 2036.

Comments on Evidence documents

Name of respondent	Relevant document	Comments	
Bracknell Forest Council	Sustainability Appraisal	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.	The screening was carried out for all sites and policies and no significant effects were identified for the options that were taken forward into the plan. However, the Regulation 19 Sustainability Appraisal did not contain the full matrix of policies and sites that was in the Regulation 18 version to inform this assessment. This is now included as a separate document (Full Habitat Regulations Screening Tables Regulation 19).
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	Infrastructure Development Plan	<p>The ICB welcomes the Council to include primary care in the Infrastructure Delivery Plan (IDP). Providing additional clinical capacity can be achieved either through expanding or reconfiguring existing GP premises to provide additional clinical spaces or delivering a new purpose-built healthcare facility onsite, either a standalone building or one of the uses within a community hub. The ICB considers that it would be appropriate to have a standalone column for new provision.</p> <p>The ICB notes that the Council includes Community Infrastructure Levy (CIL) as one of the potential capital funding. The ICB has proactively engaged with the Council and expresses our interests to explore the use of CIL funding to provide an annual funding to support primary care estates projects. The understands that the Council currently has no plan to allocate any CIL fundings towards primary care. From the document, it appears that the Council is now considering allocating CIL funding towards primary care estates development. The ICB fully supports and would like to have a detailed discussion with the Council in this regard.</p>	<p>Noted, but no change proposed. It is unclear what additional benefit a separate column would bring.</p> <p>Noted. The Council is committed to working closely with the ICB to ensure primary care projects are delivered to support the level of housing growth within the Plan period. We will continue to work closely with the ICB to identify opportunities and work with developers to ensure the proper infrastructure is sought.</p>
Turley on behalf of CBRE	Viability	As a generic point, CBRE IM have significant concerns regarding the Local Plan Update and the lack of viability evidence that supports the proposed changes sought to planning policies and the subsequent impact this is likely to have on already constrained town centre	Noted. A Viability Testing Report has now been completed and illustrates that energy efficiency standards and

Investment Management		<p>sites, in particular with regard to energy efficiency standards through redevelopment and gains in biodiversity. The difficulties of viability and the redevelopment of brownfield sites is well-versed. It is important that the Council do not further restrict the deliverability of sites with such a restrictive approach to development management, including where the proposals have the opportunity to provide a significant betterment to existing building stock.</p> <p>CBRE IM reserve the right to respond to viability evidence as and when it becomes available.</p>	<p>biodiversity requirements will not prevent development from coming forward. Moreover, an exceptional basis clause is included within Sustainable Design and Construction policies (notably CC2 and H5) which aims to ensure that the standards will not render development unviable. In terms of Biodiversity Net Gain, this is required by law and is not within the scope of the Local Plan. Nonetheless, its impacts have been considered within the assessment.</p>
Home Builders Federation	Viability	<p>The Council did not publish its viability evidence until the two week prior to the consultation closing and did not extend the consultation period as suggested by the HBF. This gave us insufficient time to properly consider the evidence and as such the HBF reserve the right to comment on the viability evidence through the examination in public.</p>	<p>Noted. No change required.</p>
Home Builders Federation	Duty to Co-operate	<p>The Council outline in their Duty to Co-operate Statement that no statements of common ground (SoCG) have been signed but there is an intention to prepare one for each of the three neighbouring planning authorities. It is disappointing that these have not been prepared for this consultation and does not point to a particularly active or ongoing approach to co-operation. SoCGs should not just be one off documents that are prepared prior to submission of the local plan but on-going statements of co-operation that are regularly updated to indicate progress, or lack of it, with regard to strategic cross boundary issues. These will need to be agreed and signed off prior to submission and HBF reserves the right to comment on these through the examination in public.</p> <p>From the evidence presented it would appear that the Council has engaged with its neighbours on the strategic issue of housing need. However, HBF disagree with the premise of this co-operation that there are unmet needs and there are the exceptional circumstances present to justify the use of alternative method, a point we return to below. Clearly the approach taken by the council has limited the scope of any co-operation and despite the Council writing to neighbouring authorities in August 2024 asking for comments</p>	<p>The timing of Statements of Common Ground is clearly highly dependent on respective local plan content and it is not always possible to have statements signed at the point of consultation. It is worth noting that there is an existing general Statement of Common Ground across the West of Berkshire area that was most recently updated in 2021. The Council does not agree that the duty to co-operate approach has not been active or ongoing. The Council also disagrees that the premise of the co-operation has rendered the engagement ineffective.</p>

		should they choose to use the standard method we are concerned that the engagement has not been effective on this issue.	
Gladman	Sustainability Appraisal	<p>The SA is flawed as it does not consider the potential for accommodating unmet housing need from nearby local authorities, in particular South Oxfordshire. The options considered in relation to housing provision are limited to:</p> <ul style="list-style-type: none"> • Option H1(i) Housing provision figure to be amended to reflect available capacity to 2041 (825 homes per year). • Option H1(ii) Retain existing approach, do not update the housing provision figures. • Option H1 (iv) Housing provision of 878 homes per year (need based on national standard methodology). • Option (v) Housing provision of 735 homes per year (based on latest locally based need figure). <p>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.</p>	<p>There is no identified unmet need from South Oxfordshire, or any authorities within the housing market area, and therefore no need to test an option of accommodating that need.</p> <p>The scores identified in the sustainability appraisal do not always allow for a noticeable difference between options, which is why it is important to cross reference to the supporting commentary, which in this case clearly states why the option was chosen.</p>
Gladman	Duty to Cooperate	RBC have historically looked within the West Berkshire HMA to meet their unmet housing needs however, going forward the West Berkshire HMA as a whole is likely to have an unmet need, and RBC will likely need to look to SODC, as well to Wokingham or West Berkshire. RBC have identified that there is a strong functional relationship with the southern area of SODC2, with many of the towns and villages within the south of the District looking towards Reading for services and facilities. Gladman do not believe that opportunities to resolve the strategic needs of neighbouring authorities have been fully met and whilst RBC has been more proactive in promoting co-operation and dialogue this has	It is not agreed that the Council has not effectively engaged with neighbouring authorities prior to the Regulation 19 consultation. This is outlined in the Duty to Co-Operate Statement. Authorities within the Western Berkshire HMA are planning

		<p>not been reciprocated and therefore its impact has been limited. Duty to Cooperate is not something that can be done retrospectively and so this is an important matter to address during the preparation of the plan.</p> <p>The approach taken to Duty to Cooperate is not sound given that RBC has not effectively engaged with neighbouring authorities, and vice versa, ahead of the regulation 19 consultation.</p>	to meet their housing needs within their own boundaries,
Gladman	HELAA	<p>The HELAA does not give enough evidence to provide the assurance that the capacity within the Borough would deliver the types of homes actually needed within the Borough.</p> <p>Gladman have concerns regarding the deliverability of the claimed capacity. Gladman have undertaken a capacity review to gain an understanding of the capacity, its deliverability and the type of dwellings that are potentially being delivered. The capacity review has looked at the 'deliverable', 'developable' and the 'potentially developable' sites.</p> <p>Gladman have concerns with including the 'potentially developable' sites which have very little evidence as to whether they would be deliverable over the plan period, furthermore a number of the 'developable sites' need further evidence as to their deliverability. The main concerns have been raised through the review are where sites currently have functioning businesses on with no evidence of moving the business. Gladman's assessment reduced the capacity by 2,005 units. This would reduce the total supply to 12,844. This supply would reduce the capacity to below the identified need of 13,230 and result in a delivery of 713 dpa.</p> <p>At the very least the 'potentially developable' sites should not be included within the capacity. Gladman do not believe there is adequate capacity within the borough to meet the identified need, and therefore the Council do need to be engaging with surrounding Local Authorities to help deliver the identified need.</p> <p>Over the previous 13 years a total of 5680 dwellings have been delivered within RBC, with an average of 406 units. RBC have not once over the past 13 years delivered in the region of the claimed housing need of 735dpa let alone the capacity of 825dpa. Gladman consider that these historic trends should be taken into account within the capacity review, as it seems unlikely that RBC will be able to achieve the proposed housing requirement. RBC should be engaging within neighbouring Local Authorities to help meet the needs identified.</p>	<p>The HELAA is a detailed assessment of the likely capacity to deliver new homes, and reasons for its approach are set out in full within the document itself.</p> <p>The approach reflects the reality of how sites come forward in Reading. Sites with functioning businesses do regularly come forward for redevelopment for housing without significant prior evidence of deliverability, and to not take this into account would be to understate the ability of Reading to meet its needs. The HELAA seeks to address this through tools such as variance rates, based on past rates of allocated sites coming forward.</p> <p>The figures for past delivery quoted in this response are incorrect. The Council monitors and publishes information on housing delivery annually in its Residential Commitments documents, and the average annual delivery over the 13 year period up to 2024 shows average annual delivery of 657. In five of those</p>

			years (including the most recent three years) delivery exceeded the need level of 735 and in four of those years (again including the three most recent) also exceeded the H1 proposed delivery level of 825.
National Highways	Statement of Consultation on Scope and Content	National Highways would like to receive a copy of the modelling assessment documentation	A draft of the Transport Modelling has now been provided to National Highways prior to its finalisation.
National Highways	Infrastructure Deliver Plan	An additional crossing over the Thames can only help LRN and potentially the SRN too.	Noted. No change required.
National Highways	Sustainability Appraisal	National Highways would like to receive a copy of the modelling assessment documentation	A draft of the Transport Modelling has now been provided to National Highways prior to its finalisation.
Wokingham Borough Council	Duty to Cooperate	Unfortunately, in the absence of a transport assessment to show the Plan is effective, WBC has felt it necessary to state that at this time the Duty to Cooperate has not been discharged and the plan is unsound. As we have discussed, WBC wish to work proactively with RBC with a view to being able to confirm the Duty to Cooperate has been met and the broad soundness of the Plan in due course and before the Plan is submitted for examination.	Noted. The Transport Modelling report did not identify significant cross-boundary impacts, and the draft report has now been provided to Wokingham Borough Council and other relevant duty to co-operate partners. As a result, WBC withdrew the duty to co-operate objection on 1 st May 2025.
Wokingham Borough Council	Sustainability Appraisal	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.	Noted. Please see response above.
Stantec on behalf of SEGRO plc	Viability	SEGRO are concerned that the Policies in the Pre-Submission Draft of the Local Plan Partial Update are not 'justified' in accordance with paragraph 35(b) of the NPPF. They	The Viability Testing Report has now been completed.

		have not been tested for viability and thus the plan cannot be considered to have met the test of 'soundness' as detailed in paragraph 35 of the NPPF and consequently proceed to examination having not been prepared in accordance with legal and procedural requirements.	
Environment Agency	IDP Delivery Schedule	<p>We welcome changes to the IDP Draft Infrastructure Delivery Plan Schedule (at Section 6) with regards to Biodiversity Action Plan and Local Nature Recovery Strategies, which takes into account our previously made comments.</p> <p>We previously at Regulation 18 stage (letter with reference WA/2006/000005/PO04/PO1-L01, dated 9 February 2024) made comments about the Water and Wastewater Infrastructure section of the schedule. The IDP schedule now states that there are a number of areas within the Borough including some parts of west and south Reading where Thames Water has identified potential capacity issues with water and wastewater. For these areas, detailed investigations and modelling will be required to determine if local infrastructure upgrade is required.</p> <p>As we have reflected within our representations on policy EN16 and the allocations policies, suitable evidence that capacity issues have been addressed by a water cycle study in order to inform the local plan update, has not been provided.</p>	<p>Noted. No change required.</p> <p>Noted. No change required. RBC will continue to work closely with Thames Water to ensure that the proper infrastructure is in place to ensure delivery of the Local Plan. Thames Water has stated: Thames Water plan to increase the capacity of Reading STW and to improve the performance of the treatment process as part of our business plan for the period 2025-2030. Our plan includes over £100 million worth of proposed investment across the main treatment stream as well as the sludge management stream. This proposed investment is subject to being awarded funding by our economic regulator, Ofwat."</p> <p>A Water Quality Assessment has now been completed.</p>

Appendix 9: Summary of responses to social media promotion

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

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

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