

Pre-Submission Draft Local Plan Partial Update – full copies of representations received (A to E)

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Alder, Funmi

(Response from webform)

Title: Ms

First name: Funmi

Last name: Alder

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: All - the types of buildings

Do you consider the Local Plan is legally compliant?:

Do you consider the Local Plan is sound?:

Do you consider the Local Plan complies with the Duty to co-operate?:

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary:

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Author name: Funmi Alder

Aviva Life & Pensions UK Ltd

17 December 2024

Our Ref: 17127/A3/PN

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

planningpolicy@reading.gov.uk

Dear Sir/Madam,

**READING BOROUGH COUNCIL LOCAL PLAN PARTIAL UPDATE PRE-SUBMISSION DRAFT
(REGULATION 19) CONSULTATION
REPRESENTATIONS ON BEHALF OF AVIVA LIFE & PENSIONS UK LTD**

We act on behalf of Aviva Life & Pensions UK Ltd (Aviva), the owners of Reading Station Retail Park. As a major stakeholder in Reading town centre, Aviva welcome the opportunity to comment on the Local Plan Partial Review (LPPR) Regulation 19 consultation. Our comments build upon those set out in our letter dated 31st January 2024 responding to the Regulation 18 Draft Plan.

The Council will be aware that since the publication of the Regulation 18 Draft Plan planning permission was granted (on 21 March 2024) by the Secretary of State for the comprehensive redevelopment of the Reading Station Retail Park site for a mixed residential and commercial scheme (LPA Ref: 2003258, PINS Ref: APP/E0345/W/21/3289748). It is therefore important that any policies that relate to the Site pay careful attention to and are consistent with the principles established by that planning permission.

National Planning Policy Framework (NPPF)

Further, it is worth noting that since the publication of the Regulation 19 draft document (in November 2024) a new version of the National Planning Policy Framework (NPPF) has been published (12 December 2024). The Council will clearly need to consider how they progress the Partial Update based on the transitional arrangements set out in Annex 1 of the NPPF. However, and for the avoidance of doubt the comments set out in these representations have been prepared in the context of the previous December 2023 NPPF.

General Comments

In general, Aviva is supportive of the Council's approach set out in the LPPR, subject to our detailed comments within these representations.

However, Aviva is concerned that a number of the suggested policy amendments and new policies (notably Policies CC2-CC4) will introduce further significant financial burdens on developments which will undoubtedly impact their viability and deliverability. As currently worded, we believe these policy requirements have the potential to stifle rather than encouraged development and it will therefore be

important for the Council to strike the right balance between (largely) environmental considerations and the wider benefits that stem from development. In the absence of significant development within the Borough over the plan period, the Council's Vision and Objectives (as set out in Section 2 of the LPPR) will not be delivered.

Moving forward the Council should ensure that policies are carefully worded to ensure that they are sufficiently flexible to respond to changing circumstances and to allow flexibility in the application of policies, such that planning applications can genuinely be considered on their own merits, and not simply against policy compliance. In this regard, viability testing of all policy requirements of the plan, taken together, is essential to ensure that these requirements do not result in implications on scheme viability, such that development cannot come forward.

It is also worth noting here that the draft Plan currently contains a number of typo's and superseded/outdated text (see paragraphs 3.2.3 and 3.2.4 for example). Prior to the publication of the next iteration of the Plan a full and careful review should be undertaken.

Our detailed comments are provided below.

Objectives

Aviva generally supports the 10 stated objectives for the Local Plan (at paragraph 2.2.2). However, as trailed above they are concerned by the inclusion of Objective 1 which seeks to achieve a net zero carbon Reading by 2030. Whilst this is a laudable aim, it goes well beyond the Governments stated objectives and will undoubtedly place greater onerous requirements (and associated costs) on development. This in turn is likely to adversely impact the delivery of the other Objectives set out in the LPPR. We therefore believe Objective 1 should be amended so that it is more reflective of the Governments stated policy position.

Policy CC2: Sustainable Design and Construction

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 off 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 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.

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.

Policy CC3: Adaption to Climate Change

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.

Policy CC4: Decentralised Energy

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 worded is not sound. It should revert to the previous wording of Policy CC4 insofar as the requirements 'shall consider' their inclusion.

Policy CC7: Design and the Public Realm

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.

Policy EN19: Urban Greening Factor

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.

Policy EM1: Provision of Employment Development

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.

Policy H4: Build to Rent Schemes

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.

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.

Policy H5: Standards for New Housing

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.

Section 5: Central Reading

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.

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.

Policy CR11: Station/River Major Opportunity Area

Aviva supports the continued allocation of the Reading Station Shopping Park for mixed use redevelopment (under Policy CR11e).

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).

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.

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 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.

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.

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.

Summary

In summary, Aviva supports the continued allocation of the Reading Station Retail Park site for mixed use redevelopment in the plan period. This is increasingly important in the context of the Council's increased housing requirement and need to prioritise the redevelopment of brownfield sites in the town centre to meet the Council's development needs in accordance with the NPPF.

However, it is important that the site specific policy is updated to reflect the planning permission that has been granted on the Site and to reflect the planning permissions on adjacent sites which make up the wider north of station allocation.

In addition, Aviva is concerned with a number of the new development management policies proposed and the significant amendments to some policies particularly where they relate to sustainability objectives. Whilst Aviva support the general thrust of these policies they are concerned that they introduce yet another burden on delivering development over and above current government standards/expectations. This will, in Aviva's view lead to development stalling or not being delivered contrary to the Visions and Objectives of the Plan.

Policies need to be carefully worded to ensure that any amendments are sufficiently flexible to respond to changing circumstances and priorities and to allow flexibility in their application alongside viability testing of all policy requirements of the plan, taken together, to ensure that development remains viable and therefore can be realised in the plan period.

We trust that due consideration will be given to these representations as part of the plan review process, and look forward to engaging with the Council as the plan review progresses.

We would be grateful if the Council would keep us up to date on arrangements for the Examination process.

Yours faithfully,



PAUL NEWTON
Planning Director

Direct: +44 2074466870
Mobile: 07802 284913
paul.newton@stantec.com

STANTEC UK LIMITED

AWE plc and AWE plc on behalf of the Ministry of Defence

Reading Borough Local Plan Partial Update to 2041

Consultation on Pre-Submission Draft (Regulation 19) November 2024

Representations made by:

**AWE plc and AWE plc on behalf of the Ministry of Defence
(MOD)**

Part A - Personal details

Part B - Representations made on the following parts of the LP Partial Update:

- B.1 Overall Plan and Proposals Map**
- B.2 Policy CC10**
- B.3 Policies EM2, EM2a, EM2b and EM4**
- B.4 Policy H13**
- B.5 Policy H14**
- B.6 Policy OU2**
- B.7 Policies SR1 and SR4e**

Part A.1 - personal details

Please enter your details here.

If an agent is appointed, please enter the client details here. The details of the agent should be completed in Part A.2.

First name

Bryan

Surname

Lyttle

Job title

Estate Planning and Development Lead

Organisation (where relevant)

AWE plc

Email address

Bryan.Lyttle@awe.co.uk

Telephone number

n/a

Address line 1

AWE

Address line 2

Reading Road

City/town

Reading

Postcode

RG7 4PR

Are you represented by an agent? Please put a X against in the appropriate box.

Yes	X
No	

Part A.2 –agent details

First name

Camilla

Surname

Fisher

Job title

Technical Director - Planning

Organisation

Tetrattech

Email address

Camilla.Fisher@tetrattech.com

Telephone number

n/a

Address line 1

20 Western Avenue

Address line 2

Milton Park

City/town

Abingdon

Postcode

OX14 4SH

Part B.1

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

Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map

Overall Plan and Policies Map

2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

3. Please give details of why you consider the Plan is not legally compliant. If you wish to support the legal compliance of the Plan, please also use this box to set out your comments.

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4. Do you consider that the Plan complies with the Duty to Cooperate? Please put a X against in the appropriate box.

Yes	X
No	

5. Please give details of why you consider the Plan fails to comply with the duty to cooperate. If you wish to support the Plans compliance with the duty to cooperate, please also use this box to set out your comments.

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6. Do you consider that the Plan is sound? Please put a X against in the appropriate box.

Yes	
No	X

7. Please give details of why you consider the Plan is unsound. If you wish to support the soundness of the Plan, please also use this box to set out your comments.

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.

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.

AWE and MOD have submitted separate representations on specific policies within the plan. However, the following paragraphs provide a high-level explanation of AWE's operations and the overarching context in which AWE and MOD make their specific representations and seek to participate in the Local Plan examination hearings.

AWE's Role and National Security Function

AWE is a Non-Departmental Public Body (NDPB) wholly owned by the MOD and operator of two licensed nuclear sites at Aldermaston (AWE A) and Burghfield (AWE B). AWE is responsible for the safe and secure running of these sites and for the delivery of the warhead contribution to the nationally and internationally significant UK nuclear deterrent. The AWE A and AWE B site are owned by the Secretary of State for Defence and are Crown Land.

The AWE sites are unique and irreplaceable components of the UK's defence nuclear enterprise, which is collectively responsible for the development, build, maintenance and delivery of the UK's nuclear Continuous at Sea Deterrent (CASD). MOD has consistently sought to ensure that constraints on delivering this capability are minimised. The success of the UK's defence nuclear enterprise remains a critical national endeavour, requiring significant and sustained investment and support from Government.

MOD requires AWE to deliver the whole life-cycle of nuclear warheads from concept design to disassembly, and meet stringent safety requirements in doing so. These are all essential elements of CASD capability. AWE A and AWE B are the only locations in the UK that can provide these capabilities.

The need for AWE A and AWE B is not static. The risks that CASD must respond to are dynamic, and the sites must be capable of responding to MOD's evolving requirements of them. The Government's commitment to investing in AWE has been consistently set out since 2005 and this position has not changed, being reiterated most recently in the Integrated Review Refresh 2023 and the Defence Nuclear Enterprise Command Paper March 2024.

The Secretary of State for Defence also announced on 25 February 2020 confirmation of the programme to replace the UK's nuclear warheads. The investment programme at AWE B includes, but is not limited to, new builds along with refurbishment, consolidation and modernisation of existing key facilities.

The criticality of CASD, and the irreplaceable nature of AWE A and AWE B in delivering it inform the precautionary approach that must be applied at both the plan-making and decision-making stages of the planning system.

Regulation of AWE's Activities

AWE is regulated by the Office for Nuclear Regulation (ONR) and holds two nuclear site licences issued under the Nuclear Installations Act 1965. AWE warhead aspects are also regulated by the defence nuclear safety regulator (DNSR) by way of an authorisation granted to AWE. Both sites also have explosives licences under the Explosives Regulations 2014 and hold various environmental permits under the Environmental Permitting (England and Wales)

Regulations 2016. AWE is further regulated for security matters by the defence nuclear security regulator (DefNucSyR).

In addition, AWE is required to meet the requirements of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPIR 2019). REPIR 2019 impose on AWE the duty to identify the hazards arising from working with ionising radiation which have the potential to cause a radiation emergency and to advise West Berkshire District Council (WBDC) of the same. WBDC is the emergency planning authority for AWE A and AWE B for the purposes of REPIR 2019.

AWE B is not currently a registered site under the Control of Major Accident Hazards Regulations 2015 (COMAH) but it may become registered in the future as a result of legislation changes and / or operational changes.

AWE is exempt from the requirement to hold Hazardous Substances Consent.

Local Plan and Relationship with AWE B.

AWE B is not located within the administrative area of Reading Borough Council (RBC). At the time of adoption of RBC's current local Plan in 2019, the DEPZ for AWE B did not materially impact RBC's area. However, following the introduction of REPIR 2019, the DEPZ around AWE B was extended in May 2020 (with a smaller extension in January 2023). This brought significant parts of RBC's southern area to the north of the M4 at junction 11 within the DEPZ.

AWE responded to the consultation on Scope and Content of the Local Plan Partial Update under Regulation 18 in November 2023 and welcomes the inclusion of many of the representations. As indicated above, however it is imperative that RBC's partial update to the Local Plan includes further refinements to the planning policies that properly reflect and respond to the DEPZ and AWE's operations.

For REPIR 2019 classification purposes, parts of the RBC's administrative area falls within three distinct protective zones around AWE B, as follows:

- 1. Urgent Protective Action (UPA)** radial distance. REPIR 2019 requires AWE to determine the UPA distance to define the minimum area where the urgent protective action of sheltering is required in case of a radiation emergency with offsite impact from AWE B. The UPA for AWE B is 3,160m; and extends into RBC's administrative area.
- 2. The DEPZ:** This is the area designated by WBDC in 2020 in accordance with REPIR 2019. The minimum geographical extent of the DEPZ is based on the UPA distance. The purpose of this zone is to set an area around a site where it is proportionate to pre-define protective actions which can then be implemented without delay in the event of a radiation emergency. It is there for the purposes of public safety. These protective actions are required to be set out in an offsite emergency plan which is principally prepared and administered by WBDC as the emergency planning authority for AWE A and AWE B, in cooperation with a wide range of other stakeholders. The word 'planning' in the term DEPZ is used in the sense of planning to deal with the immediate consequences of a potential radiation emergency, in order to mitigate the radiological risk to members of the public, rather than in the sense of land use planning. However, the DEPZ is a material consideration to land use planning plan-

making and decision-making. As noted above, the DEPZ extends into RBC's administrative area;

- 3. The Outline Planning Zone (OPZ).** The OPZ is a larger (12km) zone set by MOD where protective actions are identified at a regional/national level. While this zone requires a lower level of emergency planning, it covers considerations that enable emergency responders to provide arrangements for extremely unlikely but more severe events. The OPZ extends into RBC's administrative area.

REPPIR 2019 Monitoring and Review

The extension to the DEPZ for AWE B in 2020 was required due to changes in the evaluation and assessment required under REPPIR 2019 compared to the predecessor legislation REPPIR 2001, not because of changes to the inventory of materials or operations at AWE B. These changes were introduced by REPPIR 2019 to improve public protection standards. One of the key changes as between REPPIR 2001 and REPPIR 2019 is the requirement to risk assess and plan for events which have a low likelihood of occurrence, but a high impact if they occur. Overall REPPIR 2019 takes a more precautionary approach to public safety matters in line with updated international standards. Consistent with the position to date, AWE and MOD expect the regulatory environment to get more, not less, stringent over time.

REPPIR 2019 requires a review of the DEPZ to take place every 3 years, starting from 2019 or where there is a material change. The DEPZ was most recently reviewed by WBDC in January 2023. The outcome of this review was to amend the DEPZ for AWE B to clarify two previously ambiguous areas to the east of the DEPZ (the Six Bells, Shinfield and near Basingstoke Road, Swallowfield). These changes help illustrate WBDC's ongoing duty to keep the DEPZ and offsite emergency plan under review. These changes support the requirement for a precautionary approach to locating new development in the DEPZ.

A judicial review was brought in 2020 challenging WBDC's determination of the DEPZ for AWE B. The High Court dismissed the claim and upheld the determination of the DEPZ and refused leave to appeal (*Crest Nicholson & Ors v West Berkshire District Council* [2021] EWHC 289 (Admin)).

AWE Offsite Emergency Plan

REPPIR 2019 requires AWE to assess the likelihood and impact of a radiation emergency to the public and provide West Berkshire District Council (WBDC) (as the competent local authority with the statutory responsibility under REPPIR for off-site emergency planning for AWE A and AWE B) with the required information to establish the Detailed Emergency Planning Zones (DEPZ) around AWE A and AWE B. The DEPZ is the area where WBDC is required to have planned in detail how they, the emergency services and other organisations would respond in the unlikely event of a radiation emergency arising from AWE.

A key principle of REPPIR is that the emergency plan should 'so far as possible' avoid the occurrence of serious physical injury. In line with REPPIR, new development should where possible be located outside of the DEPZ. This is supported by the precautionary approach and is also in line with the nuclear safety concept of 'Defence-in-Depth'. While

WBDC currently has an adequate OSEP in place, the Office for Nuclear Regulation (ONR), as the statutory regulator responsible for the enforcement of REPPiR as it applies to UK nuclear sites, is concerned the OSEP is under strain. ONR wrote to WBDC in November 2023 informing them that the ONR will carry out a series of “targeted formal regulatory interventions” to ensure the necessary improvements to the OSEP are made. Enforcement action against WBDC is possible if improvements are not effectively achieved and sustained. If improvements are not able to be achieved by WBDC and the OSEP is deemed inadequate, ONR may look to AWE to restrict operations until such time that WBDC can address their concerns or, in an absolute worst-case scenario, stop AWE from working with ionising radiation.

An adequate offsite emergency plan is required to enable AWE to work with ionising radiation at AWE A and AWE B (see Regulation 10(4) REPPiR 2019).

The AWE offsite emergency plan for AWE A and AWE B has been prepared by WBDC in conjunction with the ‘AWE Off-Site Planning Group’. It sets out a multi-agency response in order to meet the following objectives (paragraph 1.2):

“To provide:

- (a) Information about the sites and their hazards
- (b) The roles and responsibilities of each responding agency
- (c) The activation, command & control and coordination procedures
- (d) Protective actions to implement
- (e) Warning and Informing, including communication procedures
- (f) Information about recovery
- (g) Where to find more information.”

The principles to which offsite emergency plans must have regard are set out in Schedule 7 Part 1 of REPPiR 2019. This includes but is not limited to:

“(b) the necessity to optimise protection strategies to ensure that the proposed response, as a whole, is predicted to do more to mitigate the radiation emergency and facilitate transition from that emergency to an existing exposure situation than to increase its duration or consequences, taking into account—

(i) the health risks arising from exposure to ionising radiation as a result of the radiation emergency, in both the long and the short term;

(ii) the economic consequences of the radiation emergency;

(iii) the effects of the disruption, both on the premises and the area immediately surrounding it, and on the public perception of the effects of the radiation emergency;

(c) the necessity of avoiding, so far as possible, the occurrence of serious physical injury to any person”.

8. Please set out the modification(s) you consider necessary to make the Plan legally compliant and sound, in respect to the matters you have identified above. You will need to say why each modification(s) will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Modifications to specific policies are set out in separate representations.

Part B.2

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

Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map

Policy CC10 – Health Impact Assessment
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2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

3. Please give details of why you consider the Plan is not legally compliant. If you wish to support the legal compliance of the Plan, please also use this box to set out your comments.

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4. Do you consider that the Plan complies with the Duty to Cooperate? Please put a X against in the appropriate box.

Yes	X
No	

5. Please give details of why you consider the Plan fails to comply with the duty to cooperate. If you wish to support the Plans compliance with the duty to cooperate, please also use this box to set out your comments.

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6. Do you consider that the Plan is sound? Please put a X against in the appropriate box.

Yes	
No	X

7. Please give details of why you consider the Plan is unsound. If you wish to support the soundness of the Plan, please also use this box to set out your comments.

See below.

8. Please set out the modification(s) you consider necessary to make the Plan legally compliant and sound, in respect to the matters you have identified above. You will need to say why each modification(s) will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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:
“Any development proposals within the Detailed Emergency Planning Zone for AWE Burghfield 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”.

Part B.3

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

Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map

Policy EM2: Location of New Employment Development
EM2a: Green Park
EM2b: North of the M4
EM4: Maintaining a Variety of Premises

2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

3. Please give details of why you consider the Plan is not legally compliant. If you wish to support the legal compliance of the Plan, please also use this box to set out your comments.

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4. Do you consider that the Plan complies with the Duty to Cooperate? Please put a X against in the appropriate box.

Yes	X
No	

5. Please give details of why you consider the Plan fails to comply with the duty to cooperate. If you wish to support the Plans compliance with the duty to cooperate, please also use this box to set out your comments.

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6. Do you consider that the Plan is sound? Please put a X against in the appropriate box.

Yes	
No	X

7. Please give details of why you consider the Plan is unsound. If you wish to support the soundness of the Plan, please also use this box to set out your comments.

See below

8. Please set out the modification(s) you consider necessary to make the Plan legally compliant and sound, in respect to the matters you have identified above. You will need to say why each modification(s) will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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 focus for new employment land to be located to the south of Reading close to or possibly within the AWE B 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 each of the policies EM2, EM2a, EM2b and EM4 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 the overall policy EM2 and EM4: *“Any development proposals within the Detailed Emergency Planning Zone for AWE Burghfield and must comply fully with policy OU2”*.

Part B.4

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

Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map

Policy H13: Provision for Gypsies and Travellers
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2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

3. Please give details of why you consider the Plan is not legally compliant. If you wish to support the legal compliance of the Plan, please also use this box to set out your comments.

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4. Do you consider that the Plan complies with the Duty to Cooperate? Please put a X against in the appropriate box.

Yes	X
No	

5. Please give details of why you consider the Plan fails to comply with the duty to cooperate. If you wish to support the Plans compliance with the duty to cooperate, please also use this box to set out your comments.

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6. Do you consider that the Plan is sound? Please put a X against in the appropriate box.

Yes	
No	X

7. Please give details of why you consider the Plan is unsound. If you wish to support the soundness of the Plan, please also use this box to set out your comments.

See below

8. Please set out the modification(s) you consider necessary to make the Plan legally compliant and sound, in respect to the matters you have identified above. You will need to say why each modification(s) will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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
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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: *“Any development proposals within the Detailed Emergency Planning Zone for AWE Burghfield must comply fully with policy OU2”*.

Part B.5

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

Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map

Policy H14: Renewal and Regeneration of Residential Areas

2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

3. Please give details of why you consider the Plan is not legally compliant. If you wish to support the legal compliance of the Plan, please also use this box to set out your comments.

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4. Do you consider that the Plan complies with the Duty to Cooperate? Please put a X against in the appropriate box.

Yes	X
No	

5. Please give details of why you consider the Plan fails to comply with the duty to cooperate. If you wish to support the Plans compliance with the duty to cooperate, please also use this box to set out your comments.

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6. Do you consider that the Plan is sound? Please put a X against in the appropriate box.

Yes	
No	X

7. Please give details of why you consider the Plan is unsound. If you wish to support the soundness of the Plan, please also use this box to set out your comments.

See below

8. Please set out the modification(s) you consider necessary to make the Plan legally compliant and sound, in respect to the matters you have identified above. You will need to say why each modification(s) will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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
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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 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: *“Any renewal and/or regeneration proposals within the Detailed Emergency Planning Zone for AWE Burghfield must comply fully with policy OU2”*.

Part B.6

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

Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map

Policy OU2: Hazardous Installations Paragraphs 4.7.15, 4.7.16 and 4.7.17

2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

3. Please give details of why you consider the Plan is not legally compliant. If you wish to support the legal compliance of the Plan, please also use this box to set out your comments.

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4. Do you consider that the Plan complies with the Duty to Cooperate? Please put a X against in the appropriate box.

Yes	X
No	

5. Please give details of why you consider the Plan fails to comply with the duty to cooperate. If you wish to support the Plans compliance with the duty to cooperate, please also use this box to set out your comments.

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6. Do you consider that the Plan is sound? Please put a X against in the appropriate box.

Yes	
No	X

7. Please give details of why you consider the Plan is unsound. If you wish to support the soundness of the Plan, please also use this box to set out your comments.

<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>
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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 ANY development located within the DEPZ, consultation zones and which satisfies the relevant consultation criteria.

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.

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.

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.

AWE and MOD consider that MOD's views on any particular development proposals should also be referred to in the policy.

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.

8. Please set out the modification(s) you consider necessary to make the Plan legally compliant and sound, in respect to the matters you have identified above. You will need to say why each modification(s) will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The suggested modifications are set out below:

1. Delete paragraph 4.7.16 and insert the following into the policy as an additional paragraph:

“In determining applications, emergency planners, the Office for Nuclear Regulation and AWE plc/Ministry of Defence will be consulted on all development proposals:

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);

b) within the Outer Consultation Zone (OCZ) for AWE Aldermaston and AWE Burghfield;

c) within the 12km consultation zone for AWE Aldermaston and AWE Burghfield;

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.”

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.”*
3. Delete “future of AWE B” in the policy and insert *“current and future operations and defence capabilities”*;
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).”*

Part B.7

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

Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map

Section 6: Strategy for South Reading
Paragraph 6.2.1
SR1: Island Road Major Opportunity Area
SR4e: Part of Former Berkshire Brewery Site

2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

3. Please give details of why you consider the Plan is not legally compliant. If you wish to support the legal compliance of the Plan, please also use this box to set out your comments.

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4. Do you consider that the Plan complies with the Duty to Cooperate? Please put a X against in the appropriate box.

Yes	X
No	

5. Please give details of why you consider the Plan fails to comply with the duty to cooperate. If you wish to support the Plans compliance with the duty to cooperate, please also use this box to set out your comments.

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6. Do you consider that the Plan is sound? Please put a X against in the appropriate box.

Yes	
No	X

7. Please give details of why you consider the Plan is unsound. If you wish to support the soundness of the Plan, please also use this box to set out your comments.

See below

8. Please set out the modification(s) you consider necessary to make the Plan legally compliant and sound, in respect to the matters you have identified above. You will need to say why each modification(s) will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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:

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”*.

Participation in hearing sessions

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in the examination hearing sessions? Please put a X against in the appropriate box

Yes, I wish to participate in the hearing session(s).	X
No, I do not wish to participate in the hearing session(s) / I am not seeking modifications to the plan	

If you wish to participate at the examination hearing session(s), please outline why you consider this to be necessary.

AWE Aldermaston and AWE Burghfield are unique and irreplaceable components of the UK's defence nuclear enterprise. MOD has consistently sought to ensure that constraints on delivering this capability are minimised.

AWE and MOD are increasingly concerned with the potential for additional development within the vicinity of these two nuclear sites, and in particular the strain that additional population will place on an already-stretched off-site emergency plan in respect of which the Officer for Nuclear Regulation has raised concerns and begun formal regulatory interventions.

It is therefore critically important that AWE and MOD's position in respect of protecting the defence capability and security of AWE sites is fully recognised and understood as part of any examination of the Local Plan. AWE and MOD consider that they should have the opportunity to explain fully how increases in population within the AWE DEPZs could directly, significantly and adversely affect AWE site operations and capability, and consequently, national security.

Whilst AWE and MOD are overall strongly supportive in principle of the approach taken by RBC to protecting AWE's operations, it is considered that there are a number of areas where specific policies are not as effective as they could be in protecting AWE's operations, which in turn raises soundness concerns. However, AWE and MOD consider that a number of straightforward modifications can be made to the drafting of key policies in order to ensure they are robust and effective over the plan period, thereby addressing any soundness concerns.

Baker, Joe

(Response from webform)

Title: Joseph

First name: Joseph

Last name: Baker

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: Kentwood Hill

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: Yes

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary:

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Author name: Joseph Baker

From: Joe Baker [REDACTED]
Sent: 12 December 2024 18:59
To: Planning Policy
Subject: Kentwood Hill

Warning!
For the attention of
RBC, BFC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Dear sir,

I am aware that your local plan, with regard to the woodland adjacent to Kentwood Hill, is receiving opposition from a number of people, particularly those who rent allotments from the charitable trust.

I would like to express my support for the charitable Trust in their efforts to raise money from the development of this site.

The Tilehurst Poor's Land Trust is a very good landlord and are not threatening the cultivated land.

The woodland is inaccessible to people, being overgrown and unmanaged. Thus, the woodland provides no benefit to the community.

Our community needs more affordable housing. This small area should be developed to provide benefits for the TPLC and residents.

At the present time, the woodland is unmanaged overgrown, intimidating to any who may enter it and probably dangerous.

I wholeheartedly support the TPLC in their plan to sell the land for development.

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.

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.

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.

I think I have said enough.

Yours truly

Joe Baker- [REDACTED]

Sent from [Outlook for Android](#)

Berkshire Gardens Trust



Reading Borough Council
planningpolicy@reading.gov.uk

Submitted by email from BerksGTplanning@gmail.com

5 December 2024

Dear Sir/Madam,

Reading Local Plan Pre-Submission Draft Partial Update November 2024

Comments from Berkshire Gardens Trust

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to the proposed Reading Local Plan Update as it affects sites listed by Historic England (HE) on their Register of Parks and Gardens and those locally listed. The Berkshire Gardens Trust (BGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of historic sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations within Berkshire.

One of the key activities of the Berkshire Gardens Trust (BGT) is therefore to help conserve, protect and enhance designed landscapes within Berkshire, an important part of the history of Reading. We are therefore grateful for the opportunity to comment on the Reading Local Plan Pre-Submission Draft Partial Update November 2024. The comments contained in this letter follow on from those in our letter dated 22 January 2024.

We would like to make the following comments.

1. 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.
2. 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.
3. However, this is not the case. 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: *Heritage assets range from sites and buildings of local historic value*; 196: *Plans should set out a positive strategy for the conservation and enjoyment of the historic environment [ie including local assets]*; and 209: *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.* 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.

4. 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 are mentioned in the Historic Environment Background Paper 2018: *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.* 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):

- Cintra Park
- King George V Gardens
- Kings Road Garden
- Palmer Park
- Chestnut Walk
- Maiden Erlegh Nature Reserve
- Possibly Coley Park

To which might be added privately owned gardens such as:

- Whiteknights
- Acacias
- MERL
- Foxhill House
- Highdown School

5. The policies under EN7 and EN8 provide no protection to the historic value of open space.

6. 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.
7. We would request that Forbury Gardens are included as part of *the cluster of heritage interest and cultural setting of The Abbey Quarter* under *CR15: The Reading Abbey Quarter* final text; and not just left to the explanatory note at the end.
8. 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.
9. We are in support of policy ER2: Whiteknights Campus, University of Reading (Strategic Policy) but reiterate the need to include
 - *Development will accord with the following criteria:* The conservation and enhancement of the historic non-designated but locally important parks and gardens at Whiteknights which extend into Wokingham Borough Council.[That part of Whiteknights in Wokingham is already locally listed]

In conclusion, we consider that policy EN4 does not comply with national policy and is therefore not sound. We ask that the other comments above are also taken on board in the final update.

Yours sincerely,

Bettina Kirkham

Bettina Kirkham DipTP BLD CMLI (retired)
BGT Chair and Planning Advisor

cc: The Gardens Trust; Reading Civic Society

BOC Limited

(Response from webform)

Title: Mrs

First name: G

Last name: Jenkins

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: Policy EN7

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: Yes

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see representation letter.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Please see representation letter.

Please upload any supporting information (if necessary). See separate representation

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: Yes

To which part of the Local Plan does this representation relate?: Policy EN17

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see representation letter.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Please see representation letter.

Please upload any supporting information (if necessary). See separate representation

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: Yes

To which part of the Local Plan does this representation relate?: Policy SR2

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see representation letter.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Please see representation letter.

Please upload any supporting information (if necessary). See separate representation

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary:

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Author name: Emma Ralphs

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

BOC Limited
The Forge
43 Church Street West
Woking
Surrey
GU21 6HT

Date 18 December 2024

Dear Sir / Madam,

BRITISH OXYGEN COMPANY REPRESENTATION TO READING BOROUGH COUNCIL'S LOCAL PLAN PARTIAL UPDATE PRE-SUBMISSION DRAFT CONSULTATION

The British Oxygen Company (BOC) submit this representation in respect of the Reading Borough Council's Local Plan Partial Update Pre-Submission Draft Consultation.

Introduction

BOC's site at Rose Kiln Lane primarily functions as a retail outlet for industrial gases. The site is also a 24/7 transport operation which includes multiple HGV vehicle movements and the loading and unloading of gas canisters. These activities generate noise which, whilst not out of character for an industrial/employment area, could adversely impact residential properties situated in inappropriately close proximity; especially if noise mitigation measures in new dwellings are not implemented, or are not implemented sufficiently.

Planning Policy & Guidance

National Policy & Guidance

Paragraph 200 of the National Planning Policy Framework (NPPF, 2024) should be adhered to in respect of BOC's operations. This paragraph sets out that planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and that existing businesses should not have unreasonable restrictions placed on them as a result of development permitted after they were established. This is known as the 'Agent of Change' principle.

This 'agent of change' principle should protect existing users, such as BOC, from unreasonable restrictions being placed upon them as a result of new development, such as residential development, and associated impacts on residential amenity. This includes appropriate mitigation on new development, should they require it.

Planning Practice Guidance relating to Noise further elaborates on the application of the 'agent of change' principle, setting out that:

"Development proposed in the vicinity of existing businesses, community facilities or other activities may need to put suitable mitigation measures in place to avoid those activities having a significant adverse effect on residents or users of the proposed scheme."

In these circumstances the applicant (or 'agent of change') will need to clearly identify the effects of existing businesses that may cause a nuisance (including noise, but also dust, odours, vibration and other sources of

pollution) and the likelihood that they could have a significant adverse effect on new residents/users. In doing so, the agent of change will need to take into account not only the current activities that may cause a nuisance, but also those activities that businesses or other facilities are permitted to carry out, even if they are not occurring at the time of the application being made.

The agent of change will also need to define clearly the mitigation being proposed to address any potential significant adverse effects that are identified.” (Paragraph: 009 Reference ID: 30-009-20190722)

Additionally, Paragraph 198 and footnote 72, of the December 2024 NPPF refers to the Noise Policy Statement for England (NPSE) (Department for Environment, Food & Rural Affairs, 2010). From the outset, the NPSE states:

“1.2 The Government recognises that the effective management of noise requires a co-ordinated and long term approach that encompasses many aspects of modern society.”

The Professional Practice Guidance on Planning and Noise (‘ProPG’, 2017) also provides guidance encouraging better acoustic design for new residential development. This guidance advocates for full consideration of the acoustic environment from the earliest possible stage of the development control process. The guidance acknowledges that there are sometimes opportunities to incorporate effective design interventions that will enable residential development to proceed, whilst in other situations it might not be appropriate to build new dwellings at a site.

In consistency with the “long term approach” supported in the NPSE and ProPG it is important to manage the impacts of noise upon development at an early stage of the planning process. Rather than relying on the implementation of noise mitigation measures at the planning application stage, it would be more effective to address these issues at the allocation and policy design stage.

Representation to Consultation

This consultation amends the Reading Borough Local Plan adopted In November 2019. As this consultation only relates to the amendments, this representation will focus on the proposed changes. This representation now discusses specific points from the Reading Borough Local Plan (Partial Update).

Policy EN7

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:

...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. ...

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).

Policy EN17

The wording of Policy EN17 is as follows:

“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.”

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.

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.

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.

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:

“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.”

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.

SR2: Land North of Manor Farm Road Major Opportunity Area

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

“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;”

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.

Furthermore, BOC objects to the undefined description of *"Provide an appropriate buffer"*. 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 *"include transitional non-residential uses"* is unambiguous and would offer a greater level of separation and protection for both the residential and employment areas.

Ensuring that there are no adverse effects on residential amenity as a result of noise from nearby industrial uses will be a challenge and noise mitigation measures are likely to be required. Therefore, BOC believes that the wording of Policy SR2 should be amended to specifically require the mitigation of any noise impacts from nearby employment/commercial uses.

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:

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",

Conclusion

Whilst BOC do not oppose the principle of new residential development in Reading, this development should be sustainably and appropriately located. Development should include sufficient noise mitigation measures where necessary to protect future residents from adverse amenity and health impacts associated with noise pollution from existing nearby industrial uses such as BOC. Implementing sufficient noise mitigation measures will also act to protect BOC and other existing industrial users of the Core Employment Area from the risk of future noise restrictions. Therefore, we respectfully ask that draft policies EN7, EN17 and draft allocation SR2 be amended according to the points raised above.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Glen Jenkins', with a stylized flourish at the end.

Mrs Glen Jenkins FRICS

Head of Estates

Email glen.jenkins@boc.com

Tel 07392 120 348

Bracknell Forest Council



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

By email to: planningpolicy@reading.gov.uk

17th December 2024

Dear Planning Policy Team,

Regulation 19 consultation on Reading Borough Local Plan Partial Update

With reference to the above consultation, I enclose comments from Bracknell Forest Council (BFC).

HOUSING NEEDS

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.

PLACE, PLANNING AND REGENERATION DIRECTORATE

Bracknell Forest Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD

T: 01344 352000 www.bracknell-forest.gov.uk

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.

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. 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.

Whilst not raising any point of soundness on approach to how site specific policies are set out, it is felt that the policies themselves (such as SR3) could be clearer if the indicative capacity was referred to within the main policy wording rather than as a footnote, for example (changes shown underlined):

Development of the South of Elgar Road site will be allocated for 360-540 residential units, with potential for supporting community uses.

GYPSY AND TRAVELLER NEEDS INCLUDING TRAVELLING SHOWPEOPLE

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.

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.

EMPLOYMENT NEEDS

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. It is noted that Policies EM2 and EM3 are proposed to be strategic.

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Bracknell Forest Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD

T: 01344 352000 www.bracknell-forest.gov.uk

RETAIL AND LEISURE NEEDS

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.

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).

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.

TRANSPORT

The measures outlined in the Infrastructure Delivery Plan are supported by BFC in that they seek to enhance public transport services and continue to promote a third Thames Crossing. This support is on the basis that improvements to Public Transport includes existing and possible future cross boundary routes travelling to and from Bracknell.

SUSTAINABILITY APPRAISAL (SA)

A partial Habitats Regulations Screening Assessment has been undertaken as part of the Sustainability Appraisal of the Local Plan Pre-Submission Draft Partial Update (Regulation 19) (November 2024). This is included in Appendix 4 of the Sustainability Appraisal (SA) and is summarised in section 5.

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.

CONCLUSION

In conclusion, whilst it is considered that certain policies and supporting text might benefit from some revisions, the main area of concern relates to the fact that the potential capacity of allocated sites (if the lower figures are achieved) may not meet the outstanding need in the table on pages 100/101.

Concern is expressed that this could prejudice the following tests of soundness:

- Justified (not an appropriate strategy)
- Effective (not deliverable over the plan period)

If you have any queries regarding this letter, please contact the Development Plan Team:
development.plan@bracknell-forest.gov.uk.

PLACE, PLANNING AND REGENERATION DIRECTORATE

Bracknell Forest Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD

T: 01344 352000 www.bracknell-forest.gov.uk

Yours faithfully,



Jo Male

Assistant Director: Planning

PLACE, PLANNING AND REGENERATION DIRECTORATE

Bracknell Forest Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD

T: 01344 352000 www.bracknell-forest.gov.uk

Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board

Reading Borough Council
Consultation on the Local Plan Partial Update Pre-Submission Draft (Regulation 19)
Representation

NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
December 2024

1. Introduction

Independent Investigation of the National Health Service in England

- 1.1. The recent-published independent investigation report of national health service in England, produced by the Lord Darzi¹ critically set out the primary care estates is “not fit for purpose” (paragraph 37, Chapter 5 of the report). While the report only indicates a national picture of the GP estates, it is noted that 20% of the GP estates predates the founding of the NHS in 1948 and more than 50% is more than 30 years old. Though the focus of the report is to call for a reform to the capital framework for primary care of the NHS, the report also indicates **the challenges of securing sufficient fundings to support primary care estates development and to ensure primary care estates are financially and operationally viable.**

National Planning Policies

- 1.2. The National Planning Policy Framework (NPPF)² sets out the Government’s planning policies for England and how these should be applied. Paragraph 2 sets out that **the NPPF must be taken into account in preparing the development plan.** Paragraph 20 of the NPPF clearly sets out that strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking) and **make sufficient provision for community facilities such as health.** Paragraph 34 also sets out that plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, **health**, transport, flood and water management, green and digital infrastructure). Health is clearly a material planning consideration in the planning system.
- 1.3. The Planning Practice Guidance (PPG)³ sets out that strategic policy-making authorities are required to cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters. Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board is one of the statutory duty-to-co-operate statutory bodies which is responsible for primary healthcare matters.

Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board

- 1.4. The Integrated Care Board is a statutory NHS organisation, which was established on 1 July 2022 by the Integrated Care Boards (Establishment) Order 2022 and replaces all Clinical Commissioning Groups (CCGs) under the Health and Care Act 2022. The ICB has the delegated function of commissioning primary care services. According to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Strategy dated March 2023⁴, primary care is the first point of contact into health and care services. Currently, Buckinghamshire, Oxfordshire and Berkshire West Inte

¹ <https://assets.publishing.service.gov.uk/media/66e1b49e3b0c9e88544a0049/Lord-Darzi-Independent-Investigation-of-the-National-Health-Service-in-England.pdf>

² https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf

³ Paragraph: 009 Reference ID: 61-009-20190315

⁴ <https://www.bucksoxonberks.west.icb.nhs.uk/media/2933/integrated-care-strategy.pdf>

grated Care Board (ICB) covers Buckinghamshire, Oxfordshire and Berkshire West⁵ areas with nearly 2 million population, including 51 Primary Care Networks (PCNs) covering 157 GP practices in total.

- 1.5. Primary healthcare estates including GP premises are funded through reimbursement of rents and business rates by the ICB based on the existing population data. The rent will then be assessed by the District Valuer, given that the ICB will reimburse that rent. As a primary care commissioner, the ICB therefore has a responsibility to ensure that any primary care provision is financially affordable and operationally viable. **The ICB has no dedicated funding for any primary care estates development in their annual budgets.**
- 1.6. Reading Borough Council (the Council) has implemented Community Infrastructure Levy (CIL) charging. However, by the time of writing this letter, no CIL contribution was used towards health facilities. Given that there are no CIL contributions towards healthcare, any necessary mitigation to avoid an unacceptable impact on primary healthcare would need to be secured by a Section 106 planning obligations.

Primary Care Networks in Reading

- 1.7. GP practices are working together with community, mental health, social care, pharmacy, hospital and voluntary services in their local areas in groups of practices known as PCNs. While all GP practices have joined a Primary Care Network (PCN) with other practices, these PCNs will bring together a wider range of professionals to work collaboratively to provide high quality support to people when they need it. Currently, there are 8 Primary Care Networks (PCNs) in Reading and a total of 28 premises in total.

2. ICB Comments

Vision and Objectives

- 2.1. The ICB agrees and supports the objective for the Local Plan is to improve the quality of life by creating good access to services and facilities to meet identified needs. However, the ICB considers that a good access to services and facilities including healthcare services is not enough to improve the quality of life. This also requires there is adequate provision of primary care services to support health and wellbeing of residents of Reading Borough. The ICB considers that this objective should be reworded to include the adequate provision of primary care services.

Policy CC9: Securing Infrastructure

- 2.2. The ICB welcomes and supports the proposed changes to Policy CC9, which healthcare provision is now under the highest priority list when securing infrastructure.

Policy CC10: Health Impact Assessment

- 2.3. The ICB welcomes and supports this new Policy CC10 related to the requirement of a Health Impact Assessment (HIA).

⁵ Berkshire West area includes Reading, Wokingham and West Berkshire

Policy H1: Provision of Housing

- 2.4. 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.

Policy H6: Accommodation for Vulnerable People

- 2.5. 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.
- 2.6. 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.
- 2.7. 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:

H6: ACCOMMODATION FOR VULNERABLE PEOPLE (Strategic policy)

- (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.*
- (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.

- (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 pre-project works. A contribution should be made to provision of offsite primary care mitigations in the form of an offsite financial contribution.*
- (iv) Development for specialist accommodation for vulnerable people will fulfil the following criteria:*
 - ~~• Developments will, where possible, locate accommodation close to, or incorporate, relevant community facilities, such as healthcare services, or day care for elderly people.~~

- 2.8. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

Policy H14: Renewal and Regeneration of Residential Areas

- 2.9. 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.
- 2.10. 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.

- 2.11. 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:

**H14: RENEWAL AND REGENERATION OF RESIDENTIAL AREAS
(Strategic policy)**

Where development would fulfil the above aims, it would generally be supported, subject to other policies in this plan and provided that:

- 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 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.*

- 2.12. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

Policy H15: Purpose-Built Shared Living Accommodation

- 2.13. 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.
- 2.14. 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.
- 2.15. 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:

H15: PURPOSE-BUILT SHARED LIVING ACCOMMODATION

Development for purpose-built shared living accommodation will meet all of the following criteria:

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.

- 2.16. 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 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:

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.

- 2.17. Unless the policy and the supporting text are reworded as suggested, the ICB would like to raise objection to this draft Policy.

Policy OU1: New and Existing Community Facilities

- 2.18. 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 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.
- 2.19. 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.
- 2.20. 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.
- 2.21. 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.

- 2.22. The ICB notes that a co-location of community services is proposed and encouraged. The ICB welcomes the concept of this co-location, but it is not clear from the policy or the supporting text how this can be achieved, including how buildings can be co-shared with other community service providers if they have different length of service contracts. While the ICB appreciates that the level of details will be discussed at the planning application stage, it would be reasonable for the Council to produce a supplementary planning document to further elaborate how co-location of community services can be delivered in detail. It should be included in the supporting text to the draft Policy. The ICB is delighted to work with the Council and developers to ensure that any forthcoming co-location proposals are suitable for the delivery of healthcare services, including GP services.
- 2.23. The wording related to healthcare in Policy OU1 should be removed and the ICB has the following recommendation as follows:

OU1: NEW AND EXISTING COMMUNITY FACILITIES (Strategic policy)

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 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.

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:

- A) an assessment clearly shows the area to be surplus to requirements; or*
- B) the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- C) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

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.

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.

- 2.24. The ICB has the following suggestions on the new Policy OU1A related to healthcare provision:

OU1A: HEALTHCARE PROVISION (Strategic policy)

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.

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:

- a) Must be operationally and financially viable;*
- 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*
- c) Should be located where there is a choice of means of travel (including walking and cycling), and in existing centers where possible.*
- d) Developers are expected to build and deliver the completed (i.e., “turnkey”) facility including its associated infrastructure to BOB-ICB.*
- e) Subject to the scale of the project(s), they may need to be co-funded by developments in the local area.*

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.

- 2.25. The ICB also has the following suggestions on supporting text to the new Policy OU1A related to healthcare provision:

- 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.

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 growth and development.*
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.*

- 2.26. Unless the policy and the supporting text are reworded as suggested, the ICB would like to raise objection to this draft Policy.

Central Reading

- 2.27. 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 homes which are already completed, there is a total of 7,951 new homes to be delivered before 2041.
- 2.28. 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:

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.

- 2.29. Unless the Section is amended as suggested, the ICB would like to raise objection in this regard.

Station/River Major Opportunity Area

- 2.30. 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:

CR11: STATION/RIVER MAJOR OPPORTUNITY AREA (Strategic policy)

Development in the Station/River Major Opportunity Area will:

- 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.*
- 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.*

CR11d, BRUNEL ARCADE AND APEX PLAZA

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.~~

- 2.31. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

West Side Major Opportunity Area

- 2.32. 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.
- 2.33. 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:

CR12: WEST SIDE MAJOR OPPORTUNITY AREA (Strategic policy)

Development in the West Side Major Opportunity Area will:

- i) Contribute towards providing a mix of uses including residential. Development for education and healthcare will be an acceptable part of the mix;*
- 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.*

CR12a, CATTLE MARKET

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.

- 2.34. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

East Side Major Opportunity Area

- 2.35. 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.
- 2.36. 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:

CR13: EAST SIDE MAJOR OPPORTUNITY AREA (Strategic policy)

Development in the East Side Major Opportunity Area will:

- 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;*
- 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.*

CR13b, FORBURY RETAIL PARK

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.

CR13c, KENAVON DRIVE & FORBURY BUSINESS PARK

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.

- 2.37. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

Other Sites for Development in Central Reading

- 2.38. 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.
- 2.39. 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.
- 2.40. 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.
- 2.41. The ICB has the following suggestions to Policy CR14:

CR14: OTHER SITES FOR DEVELOPMENT IN CENTRAL READING

The following sites will be developed according with the principles set out in this policy:

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.

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.

- 2.42. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

South Reading

Land North of Manor Farm Road Major Opportunity Area

- 2.43. 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:

SR2: LAND NORTH OF MANOR FARM ROAD MAJOR OPPORTUNITY AREA
(Strategic policy)

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

Development will:

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.

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.

- 2.44. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

South of Elgar Road Major Opportunity Area

- 2.45. 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.
- 2.46. 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.
- 2.47. The ICB has the following suggestions to Policy SR3:

SR3: SOUTH OF ELGAR ROAD MAJOR OPPORTUNITY AREA (Strategic policy)

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.

Development will:

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.

- 2.48. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

Other Sites for Development in South Reading

- 2.49. 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.
- 2.50. 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:

SR4: OTHER SITES FOR DEVELOPMENT IN SOUTH READING

The following sites will be developed according with the principles set out in this policy:

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.

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.

- 2.51. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

West Reading and Tilehurst

- 2.52. 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.

- 2.53. 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:

WR1: DEE PARK

The Dee Park area, as identified on the Proposals Map, will continue to be regenerated to provide a sustainable community including the following:

Financial contributions towards primary healthcare supporting any estates projects within the existing GP practices in West Reading and Tilehurst to provide additional clinical capacity.

- 2.54. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

Park Lane Primary School, The Laurels and Downing Road

- 2.55. 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.
- 2.56. 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.
- 2.57. 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:

WR2: PARK LANE PRIMARY SCHOOL, THE LAURELS AND DOWNING ROAD

Financial contributions towards primary healthcare supporting any estates projects within the existing GP practices in West Reading and Tilehurst to provide additional clinical capacity.

- 2.58. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

Other Sites for Development in West Reading and Tilehurst

- 2.59. 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.

- 2.60. 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:

WR3: OTHER SITES FOR DEVELOPMENT IN WEST READING AND TILEHURST

The following sites will be developed according with the principles set out in this policy:

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 agreement with BOB-ICB, any primary care mitigations will be secured through planning obligations.

- 2.61. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

Caversham and Emmer Green

- 2.62. 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.
- 2.63. 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:

CA1: SITES FOR DEVELOPMENT IN CAVERSHAM AND EMMER GREEN

The following sites will be developed according with the principles set out in this policy:

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.

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.

- 2.64. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

Caversham Park

- 2.65. 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.
- 2.66. 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:

CA2: CAVERSHAM PARK

The following sites will be developed according with the principles set out in this policy:

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.

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.

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.

- 2.67. Unless the policy is reworded as suggested, the ICB would like to raise objection to this draft Policy.

East Reading

- 2.68. 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.
- 2.69. 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:

ER1: SITES FOR DEVELOPMENT IN EAST READING

The following sites will be developed according with the principles set out in this policy:

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.

Infrastructure Delivery Plan

- 2.70. 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.
- 2.71. 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.
- 2.72. The ICB has the following suggestions to the table:

<i>Location</i>	<i>Type</i>	<i>Scheme</i>	<i>Need for Scheme</i>	<i>Scheme Requirements</i>	<i>Capital Cost and Funding</i>	<i>Timescale (where known)</i>	<i>Lead Delivery Agency</i>
<i>Borough-Wide</i>	<i>Social and Community</i>	<i>Primary Care</i>	<i>Additional clinical capacity at existing surgeries associated with development through expanding or reconfiguring the existing premises</i>	<i>The commissioning of pre-project works and the commencement of the identified project(s) from the pre-project works</i>	<i>Developer contributions and CIL</i> <i>The following costs per sqm to be used to work out the cost estimate of the identified project(s):</i> <ul style="list-style-type: none"> <i>New build and extensions (involving land purchase) - £6,310 psm</i> <i>Extensions (no land purchase) - £5,692 psm</i> <i>Internal refurbishments/reconfigurations - £3,750 psm</i> 	<i>Ongoing</i>	<i>BOB-ICB, RBC</i>
<i>Borough-Wide</i>	<i>Social and Community</i>	<i>Primary Care</i>	<i>Relocation of existing surgeries to larger fit-for-purpose healthcare facilities</i>	<i>The commission of pre-project works, and the “turnkey” facilities should be delivered by developers with the provision of the subsidised rental arrangement (if the facility is provided under a leasehold arrangement)</i>	<i>Developer contributions and CIL</i> <i>The following costs per sqm to be used to work out the cost estimate of the identified project(s):</i> <ul style="list-style-type: none"> <i>New build and extensions (involving land purchase) - £6,310 psm</i> 	<i>Ongoing</i>	<i>BOB-ICB, RBC</i>

<i>Central Reading</i>	<i>Social and Community</i>	<i>Primary Care</i>	<i>Relocation of existing surgeries to larger fit-for-purpose healthcare facilities</i>	<i>The commission of pre-project works, and the “turnkey” facilities should be delivered by developers with the provision of the subsidised rental arrangement (if the facility is provided under a leasehold arrangement)</i>	<i>Developer contributions and CIL</i> <i>The following costs per sqm to be used to work out the cost estimate of the identified project(s):</i> <ul style="list-style-type: none"> <i>New build and extensions (involving land purchase) - £6,310 psm</i> 	<i>Ongoing</i>	<i>BOB-ICB, RBC</i>
<i>South Reading</i>	<i>Social and Community</i>	<i>Primary Care</i>	<i>Relocation of existing surgeries to larger fit-for-purpose healthcare facilities</i>	<i>The commission of pre-project works, and the “turnkey” facilities should be delivered by developers with the provision of the subsidised rental arrangement (if the facility is provided under a leasehold arrangement)</i>	<i>Developer contributions and CIL</i> <i>The following costs per sqm to be used to work out the cost estimate of the identified project(s):</i> <ul style="list-style-type: none"> <i>New build and extensions (involving land purchase) - £6,310 psm</i> 	<i>Ongoing</i>	<i>BOB-ICB, RBC</i>
<i>Borough-</i>	<i>Social and</i>	<i>Primary</i>	<i>Relocation of</i>	<i>The</i>	<i>Developer contributions and CIL</i>	<i>Ongoing</i>	<i>BOB-ICB,</i>

<i>Wide</i>	<i>Community</i>	<i>Care</i>	<i>existing surgeries to co-locate with other community services within a community hub/centre</i>	<i>commission of pre-project works and the provision of subsidised rental arrangement of the premises</i>			<i>RBC</i>
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3. Glossary

- 3.1. The ICB considers that it would be appropriate to have a legal definition of the ICB under the Glossary section and sets out that we are the primary care commissioner. The ICB has the following suggestion:

NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB): A statutory NHS organisation which was established on 1 July 2022 by the Integrated Care Boards (Establishment) Order 2022 and has the delegated function of commissioning of primary care services.

4. Community Infrastructure Levy

- 4.1. The ICB welcomes an opportunity to discuss being a recipient of Community Infrastructure Levy (CIL) contributions towards Primary Care developments with Reading Borough Council.

Canal & River Trust



**Canal &
River Trust**

Making life better by water

planningpolicy@reading.gov.uk

Your Ref

Our Ref CRTR-POL-2024-43087

Monday 16 December 2024

Dear Case Officer,

Reading Borough Local Plan – Draft Partial Update

Thank you for your consultation on the above document.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.

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.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Jane Hennell MRTPI
Area Planner

Jane.Hennell@canalrivertrust.org.uk
07747 897793

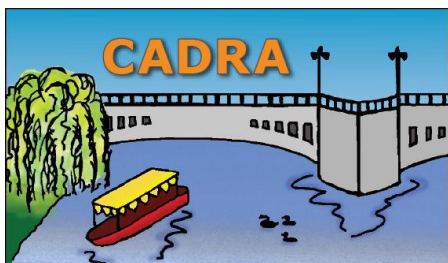
<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk W: canalrivertrust.org.uk T: 0303 040 4040

Patron: King Charles III. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792. Registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW

Caversham and District Residents Association (CADRA)



**Caversham
And District
Residents
Association**

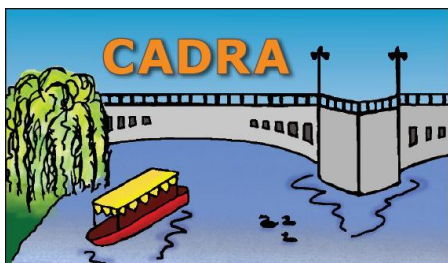
CADRA Comments on Local Plan partial update

FAMILY ACCOMMODATION IN READING TOWN CENTRE

As set out in the CADRA response to the previous consultation, we remain very concerned about the facilities and outdoor space for families living centrally.

RETAIL

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.



**Caversham
And District
Residents
Association**

CA1f REAR OF 1 & 3 WOODCOTE ROAD AND 21 ST PETER'S HILL

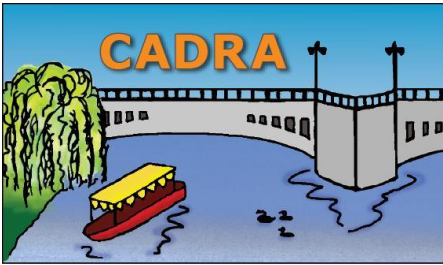
This area has the potential to impact the Chilterns escarpment and the views across the Thames from Thames Prom. Additional conditions should be included to protect the green canopy and views from the Prom. This is necessary to comply with policies EN13 and EN 14 as well as EN1 as set out in more detail for St Peters Conservation Area.

CA1h HEMDEAN HOUSE SCHOOL, HEMDEAN ROAD

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

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.



**Caversham
And District
Residents
Association**

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.

Helen Lambert

CADRA Chair

17 Dec. 24

CBRE Investment Management

Reading Borough Council Local Plan Update Regulation 19 Consultation

Land at Meadow Road, Reading

December 2024

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1. Introduction

- 1.1 These representations are prepared by Turley on behalf of CBRE Investment Management (“CBRE IM”) in response to the Reading Borough Council Local Plan Update (“LPU”) Regulation 19 consultation with respect of their existing interests at land at Meadow Road, Reading.
- 1.2 The extent of the CBRE IM’s full land control (“the Site”) is demonstrated on **Appendix 1** and extracted in Figure 1 below.

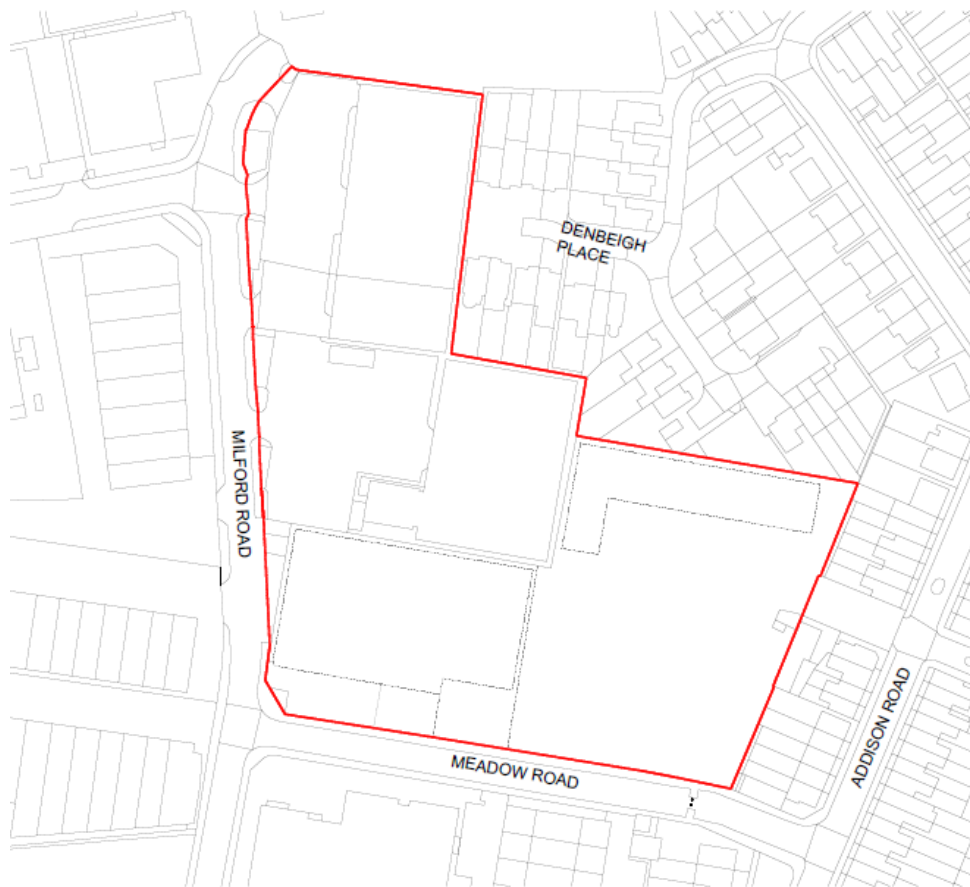


Figure 1 CBRE IM’s full land control

- 1.3 The Site is included within the LPU as a designated site, with one half forming a residential allocation under Policy WR3b 2 Ross Road & Part of Meadow Road, with the remainder comprising part of the Richfield Avenue core employment area.
- 1.4 This representation principally focuses on concerns in relation to the allocation of the eastern portion of the site for residential. The overarching aim of these representations is for land allocated for residential under draft Policy WR3b to be redesignated as part of the Core Employment Area.
- 1.5 These representations also focus on matters within the Regulation 19 consultation documentation that particularly affect the Site.

2. The Opportunity

Site Surroundings

- 2.1 Central Reading is a focus within the adopted Development Plan for considerable regeneration and growth, with a particular focus on delivering residential and employment development redevelopment of a number of brownfield sites.
- 2.2 Reading is widely recognised as the principal regional and commercial centre of the Thames Valley and recognised as a strategic regional growth hub. One of the reasons for Reading's continued success is its excellent regional and national connectivity.
- 2.3 The town is a major transport interchange, continuing to benefit from Reading Station and its strategic location on the M4 corridor and proximity to Heathrow Airport and London.
- 2.4 Reading railway station is located within walking distance to the site and is one of the most important hub railway stations in the UK at the convergence of 4 national lines for both passengers, freight, and the Trans European Network. It provides a range of direct national, regional and local services to key economic centres including London, Birmingham, Bristol, Manchester and Cardiff.
- 2.5 Reading is located immediately north of the M4 and can be easily accessed from 3 junctions (10 to 12) to provide strategic road access west towards Bristol and Wales and wider southwest, as well as facilitating connections eastward towards Heathrow, Gatwick and towards London and the M25.

The Site

- 2.6 The site is located within an established industrial area within central Reading. The site sits in close proximity to Reading Train Station and the central core of Reading Town Centre.
- 2.7 The eastern half of the site includes a large area of hardstanding (which remains in lawful employment use following the demolition of a building), with two storey commercial units sited along the northern boundary, including 8no. roller shutter doors for goods vehicles (Talbot House). Its extant lawful use is employment.
- 2.8 Existing vehicular access to the eastern half of the site is currently achieved via Meadow Road to the south. The northeastern, and eastern boundaries abut residential gardens (including Denbeigh Play Area to the northeast). To the east, residential development comprises 2.5 storey terraced housing. To the south, the site abuts Meadow Road, beyond which lies recently completed Bellway residential development for 96 dwellings and associated car parking, public realm and landscaping (ref. 171814).
- 2.9 The western half of the site comprises a series of 2 storey commercial units (and ancillary uses) that are currently in use, with ornamental landscaping along the western edge. Commercial units front onto Meadow road to the south.

- 2.10 The site is bordered to east and south by residential dwellings, including Former Cox & Wyman Ltd site (redeveloped and occupied residential units). To west and north, the site adjoins commercial units forming part of Richfield Avenue Core Employment Area.
- 2.11 In addition, the site is well served by the strategic highways network, located of the A339 that leads to the A33 and M4 Junction 11 provided strategic links to west and wider South East (including London). It is well suited to facilitate employment uses.

Designations

- 2.12 The adopted Reading Local Plan Policies map shows that eastern half of the site is designated within the Reading Local Plan under Policy WR3b (Other Sites for Development in West Reading and Tilehurst: 2 Ross Road & part of Meadow Road) (Grey Shading in Figure 1), with the western half of the site within the Reading Local Plan under Policy EM2g (Core Employment Area: Richfield Avenue).
- 2.13 The site is within an Air Quality Management Area (indicated by the red line in Figure 1). There are no identified listed heritage assets within or in close proximity to the site nor are there are no landscape, ecology or biodiversity designations or constraints on the site.
- 2.14 The majority of the Site is located within Flood Zone 1, but it is acknowledged that the western half of the site is partly located within Flood Zone 2.

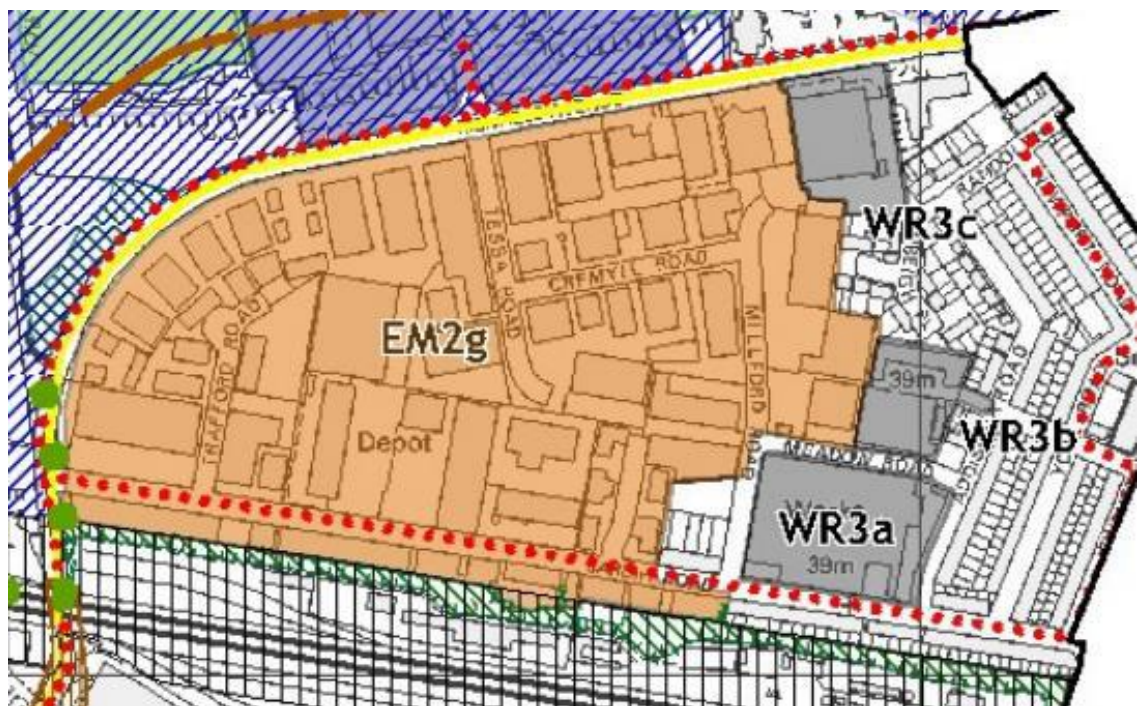


Figure 2 Reading Local Plan Policies Map Extract

Proposed Re-development Opportunity

- 2.15 The site currently sits in extant employment use, with a series of dated buildings that do not meet modern user requirements, or expectations in the market. It sits on the

edge of the Richfield Avenue Employment Area and is heavily influenced by the surrounding employment buildings.

- 2.16 The current proposals for the site, will see the site redevelopment for commercial uses, to provide a modern enhancement to the dated employment stock, contributing to a high quality environment for business use.
- 2.17 In summary the proposed development comprises the following:
- Demolition of existing buildings that are dated and are of limited architectural value that do not meet modern user requirements;
 - Provision of high-quality commercial units of various sizes to accommodate a range of commercial units, including start up and 'maker units' to allow businesses to expand and adapt;
 - Reprovision and intensification of previously developed land for employment generating uses on and adjacent to, a designated Core Employment Area;
 - Provision of additional supplemental landscaping to add visual amenity and biodiversity value; and
 - Enhanced public realm throughout the site, complimenting adjoining uses and the transition nature of the site.
- 2.18 It is accepted that a proportion of the site is allocated for residential uses within the adopted and emerging Local Plan but for the reasons set out in this representation, there is clear and compelling justification for the site to come forward for employment uses in line with its extant use.
- 2.19 CBRE IM are currently undertaking successful and collaborative engagement with Reading Council through pre-application discussions. It is the intention that an application will be lodged in the first half of 2025 for the site to be redevelopment for commercial uses.
- 2.20 The scheme presented at through pre-application submissions is presented at **Appendix 2**.

3. Land at Meadow Road – Site Assessment and Response to the Evidence Base

3.1 This section provides an assessment of the key considerations of the Site, taking into account the documentation within the Council’s evidence base.

Housing and Economic Land Availability Assessment (November 2024)

3.2 Within the Council’s Housing and Economic Land Availability Assessment (November 2024) the Site was assessed under ref. TH022 (northeast), ref. TH023 (south east), and TH048 (west).

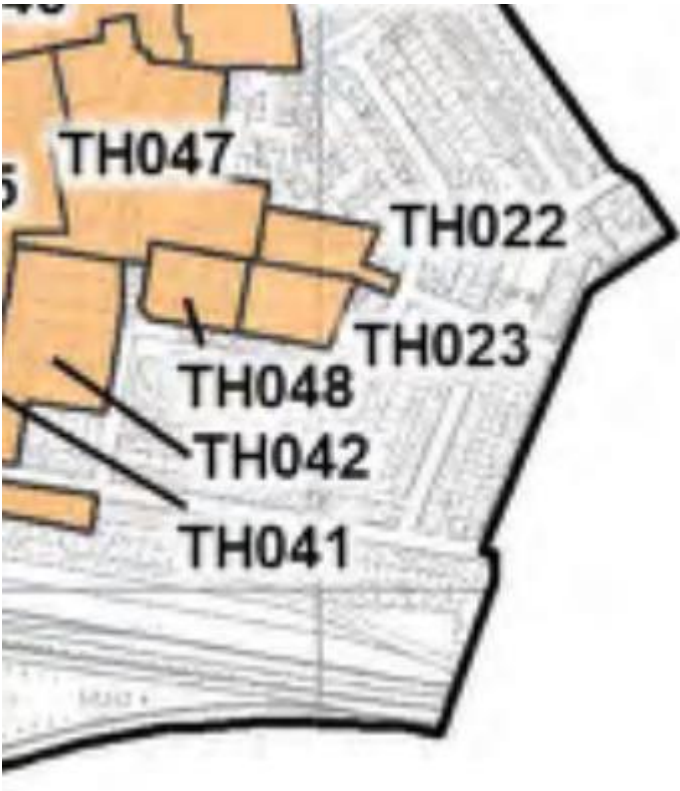


Figure 3 RBC HELAA Map Extract

3.3 The HELAA identified the sites as follows:

Site Code	Name	Area	Suitability	Availability	Achievability	Developable
TH022	2 Ross Road	0.28	Suitable	Potentially Available	Potentially achievable	Potentially Developable
TH023	Cleared Site, Meadow Road	0.32	Suitable	Available	Potentially achievable	Developable (years -10, 10-15)
TH048	Unit 3-5 Meadow Road	0.32	Unsuitable	N/A	N/a	Not Developable within next 15 years

- 3.4 CBRE would reiterate that the Site as promoted through these representations remains within their control and comprises brownfield land within the urban limits of Reading. However, the eastern half of the site is not available for residential use, nor has it been promoted as such to the local planning authority.
- 3.5 We would request on behalf of our client that the site is removed as a residential allocation under the Local Plan and the site re-designated as part of the core employment area.

Reading Local Plan Update: Sustainability Appraisal

- 3.6 The Sustainability Appraisal of the Local Plan Partial Update Regulation 19 version (November 2024) does not include an assessment against each individual allocation proposed through WR3 'Other sites for development in West Reading and Tilehurst', rather it groups the identified sites together. The SA scores the grouping of sites against each SA objective using a rated scale of "very positive impact" to "very negative impact".
- 3.7 The 2024 SA at Paragraph 2.9 sets out that:
- "The Sustainability Appraisal assesses the policies and sites set out within the Local Plan Partial Update."*
- 3.8 Paragraph 2.10 states:
- "Considering the Local Plan Partial Update comprises an update of a select number of policies only, it is not deemed necessary to carry out a full new Scoping Report"*
- 3.9 The options assessed include 'proposed approach option' and 'business as usual' option. As the Site is currently allocated, with no changes proposed to the requirements of this policy, the summary justification for the 'business as usual' for Policy WR3 states
- "The existing policy approach would have similar positive effects in terms of addressing climate change (1,2,3). Retaining capacities on sites as existing would fail to reflect the most up to date needs and capacities information and would not aid in achieving sustainable housing provision nor facilitating economic growth (13,18) and may increase pressure on undeveloped land to meet the provision (4)."*
- 3.10 In this scenario, the SA scores the Site as "Neutral impact" or "Tendency to a positive impact on the sustainability objective" across all SA Objectives with the exception of SA9 (attractive and clean environments) where it scored "unknown" and SA10 (Value, protect and, where possible, enhance the historic environment) where the Site scored unknown "tendency to a negative impact on sustainability objective".
- 3.11 This Proposed Approach SA option for Policy WR3 that includes updates to reflect the status of development on allocated sites. Remove WR3a, WR3c, WR3d, WR3e, WR3m, WR3q. Changes to capacities including residential use for The Meadway Centre

(WR3o), potential for ground floor commercial use at Moultsford Mews (WR3j) and respite care use for Amethyst Lane (WR3n) states:

“There could be positive impacts on addressing climate change (1,2,3) though increasing the density on existing which could also help to avoid building on undeveloped land (4) as well as making appropriate use of resources (5). The possible impact on townscape character and the historic environment (9 and 10) could be negative due to increased capacity and intensification of use and therefore their impact on the surrounding environment. However, it is hoped that the impact on these objectives would be positive as their effect on such should be controlled via other policies contained within the local plan. The impact on housing delivery (13) would be positive due to increased capacities to help to meet the various development needs. The impact on sustainable economic growth (18) could positive in a sense as it would enable more homes within the borough which would help boost the local economy and workforce, and indeed it could be that more office/commercial space is brought forward).”

- 3.12 The matrix is referenced below, along with our comments in response, to, and a suggested updated ‘scoring’ in light of this justification.

- 3.13 The RBC scoring in the matrix below includes the 2024 SA Score and that in the November 2017 SA which assessed the site for residential uses (for which it was later allocated):

There would be the same environmental costs and benefits as for all types of redevelopment on CO2 (1), energy use (3), waste (5) and pollution (6). The site is surrounded by Flood Zone 2, but is not in it itself, so there may be marginal effect on adaptation to climate change (2). Redevelopment of the site would be likely to make a positive contribution to the townscape. It would have a significant positive effect through use of a previously developed site (4), in an accessible town centre fringe location (14), which could provide a significant amount of housing (13). Development would bring residents into an area with potentially low air quality and contamination issues (11), but at the same time would remove a noisy use from near existing residents and eliminate any effects on well-being. Redevelopment of the site could prevent it becoming a target for anti-social behaviour (12). Residential could put pressure on town centre health (15) and education (20) infrastructure, and would result in the loss of a site previously used for employment purposes (18). It would also locate residents closer to town centre leisure uses (17). Failing to address flooding issues would have negative effects with regard to equality (16). Locating residents with in areas of flood risk may disproportionately affect individuals with disabilities and older residents.

- 3.14 The SA 2017 also assessed the site for Office uses, summarising the site as below:

Many of the effects would be the same as for a residential development, but lacking the effects of residents in this location (2, 11, 15, 20) There would be a significant positive effect on the economy through re-provision of employment generating uses (18). An employment development would be likely to make a positive contribution to the townscape, but this is largely dependent on design (9). This alternative would fail to provide housing (13).

- 3.15 Accordingly, CBRE ask that the Sustainability Appraisal be revisited and revised to fully assess the promoted site at Land at Meadow Road, reflecting the commercial and industrial uses as set out through these representations.

SA Obj	Objective	SA 2024	SA 2017 (Resi)	CBRE response	Updated Score
1	To address the climate emergency and its impact by minimising CO2 emissions and other greenhouse gases, through ensuring that development adheres to the specific policies set out in the Local Plan	? ✓	✓X	Supporting technical information submitted alongside any application would the building sustainability measures will be significantly higher than current.	✓ Positive impact
2	Adapt to inevitable climate change in terms of preparedness for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage	? ✓	?X	Any forthcoming application, in liaison with the EA and LLFA can suitably mitigate against climate change	✓ Positive impact
3	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	? ✓	✓X	Appropriate provision can be made to ensure the sustainable construction and operation of the development can be adhered too.	✓ Positive impact
4	Minimise the consumption of, and reduce damage to, undeveloped land	? ✓	✓X	It is unclear how the Council have come to his conclusion noting the site is within town centre limits, and forms brownfield land that can be intensified appropriately	✓✓ Significant positive effect
5	Minimise the generation of waste and promote more sustainable approaches to waste management	? ✓	✓X	Appropriate provision will be made to facilitate refuse and recycling collections within the development.	✓ Positive impact
6	Minimise air, water, soil/ ground and noise pollution, and improve existing areas of contaminated land and poor air and water quality.	○	○	Appropriate provision can be made through any application to ensure the remediation of degraded land and maximise opportunities to improve air and water quality.	✓ Positive impact

7	Value, protect and enhance the amount and diversity of wildlife, habitat and geology, and other contributors to natural diversity, including establishing/enhancing ecological networks, including watercourses and surrounding corridors	○	○	Supporting technical information submitted alongside the application confirms a gain in biodiversity can be achieved and supplemental planting secured.	✓ Positive impact
8	Avoid contributing towards a likely significant effect, either alone or in combination with other plans and projects, that could lead to an adverse effect on the integrity of internationally-designated wildlife sites	○	○	CBRE and V7 agrees with the Council commentary on this matter.	○ Neutral impact on the sustainability objective
9	Create, enhance and maintain attractive and clean environments including protecting and, where appropriate, enhancing landscape and townscape character.	?	? ✓	Any forthcoming design of the site can enhance the profile of the site and wider area through detailed design and hard and soft landscaping	✓ Positive impact
10	Value, protect and, where possible, enhance the historic environment and the heritage assets therein and the contribution that they make to society, the environment and the economy	?X	○	There are no heritage assets that will be impacted by the allocation of the site.	○ Neutral impact on the sustainability objective
11	Protect, promote and improve human health, safety and well-being including through healthy lifestyles.	○	?X	The site is in an accessible location where there is a genuine choice of sustainable transport modes	✓ Positive impact
12	Promote strong and vibrant communities through reduction in crime, and the fear of crime and enhanced community cohesion.	○	? ✓	The development can be designed to be high quality, legible with high quality public spaces in the immediate vicinity and increased overlooking of public spaces	✓ Positive impact
13	Ensure high quality, sustainable housing of a type and cost appropriate to the needs of the area	?✓	✓✓	The site will not have a detrimental impact on the delivery of housing, as no housing	○ Neutral impact on the

				proposals came forward through the existing Local Plan process.	sustainability objective
14	Reduce the need for travel and transport particularly by car or lorry, facilitate and encourage sustainable and active travel choices.	○	✓	CBRE and V7 agree with the Council commentary on this matter.	✓ Positive effect
15	Ensure all essential services and facilities, including healthcare, is physically accessible and adequate for all	○	? X	The site will have no impact on essential services or facilities	○ Neutral impact on the sustainability objective
16	Avoid significant negative effects on groups or individuals with regard to race, age, disability, gender reassignment, pregnancy and maternity, religion or belief, sex or sexual orientation	○	?X	CBRE and V7 agrees with the Council commentary on this matter.	○ Neutral impact on the sustainability objective
17	Value, protect and enhance opportunities for all to engage in culture, leisure, and physical and recreational activity, particularly in areas of open space and waterspace.	○	○	The development of the site will enhance the public realm with positive intervention in to reinvigorate this area.	✓ Positive impact
18	Facilitate sustainable economic growth and regeneration that provides employment opportunities for all and supports a successful, competitive, inclusive and balanced local economy that meets the needs of the area and helps to enable the transition to a low carbon economy	? ✓	? ✓	CBRE and V7 consider the intensification of employment uses on a site allocated for such will have significant positive effects.	✓✓ Significant positive effect
19	Reduce deprivation and inequality within and between communities	○	○	CBRE and V7 agrees with the Council commentary on this matter.	○ Neutral impact on the sustainability objective

20	Maximise access for all to the necessary education, skills and knowledge to play a full role in society and support the sustainable growth of the local economy.	○	?X	The development would not provide direct education skills however there will be opportunities to contribute to the sustainable growth of the local economy through the provision of a variety of commercial and industrial employment uses through the redevelopment of the site.	✓ Positive impact
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4. Representations to Policy WR3b

Policy Context

- 4.1 The National Planning Policy Framework (Framework) is clear at paragraph 85 noting that:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”

- 4.2 In this context, planning policies and decisions should identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period, and be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (Paragraph 86).

- 4.3 Paragraph 125(c) goes on to explain that the planning process should

“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land, ...promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively”

- 4.4 Furthermore, Paragraph 127 is clear in that:

“planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped)”

- 4.5 All of the above is vital to support strong, vibrant economies in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.

- 4.6 The position is reinforced by the vision of the Local Plan Update which states:

“Reading will continue to thrive as an internationally recognised economic centre, and the core of a wider, vibrant urban area and surrounding hinterland within other

authorities, that makes a vital contribution to the UK economy. It will be an environment where new business can start up and flourish. It will continue to adapt to ensure its success continues with economic changes and new working practices. The right infrastructure to enable Reading to continue to fulfil this role will be in place, and people will be able to easily move around the town with a comprehensive network of public transport, walking and cycling. The centre will continue as a regionally important shopping and business location..."

- 4.7 In support of this vision, Paragraph 4.3.2 of the Local Plan recognises that *"Reading is increasingly being seen as a good location for logistics operators"*, with Policy EM1 requiring a net 167,000sqm of industrial and/or warehouse space in Reading Borough for the period 2023 to 2041.
- 4.8 In locating this growth, Policy EM2 recognises that major employment uses including industrial and storage and distribution will be located in the A33 corridor or in the Core Employment Areas. These Core Employment Areas are *"likely to continue to be needed in employment use"*, with *"scope for intensification of employment sites within Core Employment Areas, such as development on surplus parking or servicing space, which will be acceptable subject to other material considerations."*

Comments on Policy WR3b

- 4.9 Despite the above policy context and the fact that the site has not been brought forward for residential uses since the adoption of the current Local Plan (since 2019), the Regulation 19 Local Plan proposes to retain the allocation of the eastern half of the site for residential purposes, taking it out of the core employment area.
- 4.10 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.
- 4.11 For the following reasons it is our client strong view that the site be de-allocated for residential purposes and re-designated as part of the core employment area:
- **Sterilisation of Land** - Paragraph 126 of the Framework sets out that *"Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:*
 - *it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and*
 - *in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area."*

The Local Plan was adopted in November 2019 and as a result has been in place for c.5 years. It is also to be subject to a review in the near future. There has been no progression of the site for residential purposes, despite land around the site coming forward for residential development. Indeed, the landowner does not intend to bring the site forward for residential purposes due to the viability of residential use (and in that regard do not believe they were consulted on the allocation of the site in the Local Plan). Evidence of the viability of the site is to be submitted with the eventual planning application and can be shared with the Inspector as required. In line with paragraph 126 of the Framework the Council should consider alternative uses, such as those proposed by this pre-application request rather than unnecessarily sterilise the development site due to an undeliverable allocation.

- **Impact on Housing Trajectory** - We note that Policy EM1 of the Local Plan sets out that *“Development that would exceed the levels of employment development set out in this policy, after existing permissions and allocations are accounted for, will need to either: (a) demonstrate that it will not result in additional need for local housing; or (b) mitigate its impacts on the need for local housing, which may be through the provision of additional residential development”*

The previous Regulation 18 Local Plan Review documentation at paragraph 3.288 sets out that *“In terms of industrial and warehouse floorspace, there has been a net gain of 19,834 sq m over the plan period so far from 2013 to 2022, compared to the identified need in EM1 of 148,000 sq m. This **is some way behind the rate of development to meet the needs in full over the plan period, although it is at least a positive gain.** In any case, meeting industrial and warehouse needs is particularly dependent on the delivery of one large Local Plan site which has not yet come forward. There were outstanding permissions for industrial and warehouse space totalling 32,297 sq m at 31st March 2022.”*

The current draft Regulation 19 Local Plan document sets out at paragraph 4.3.4 the following amendments:

- 4.3.4 An ~~Economic Development Needs Assessment (EDNA)~~ Commercial Development Needs Assessment (CDNA) for ~~Central Berkshire~~ Reading¹⁰⁰ was carried out in ~~2016~~ 2024, which identified the level of need for additional office, ~~and industrial or~~ warehouse or research and development space between ~~2013-2023~~ and ~~2036~~ 2041. The results of the EDNA are summarised in the box below, but in summary it is considered that the figures that Reading needs to plan for between ~~2013-2023~~ and ~~2036-2041~~ are:
- ~~52,775~~ 85,803 of office floorspace; and
 - ~~148,440~~ 167,113 sq m of industrial ~~and~~ warehouse and research and development floorspace¹⁰¹.

It is clear that the overall need for commercial floorspace has increased.

Further, the latest Annual Monitoring Report 2022 / 2023 notes at Table 7,1 that there was a loss of 6,654 sqm of industrial and warehousing floorspace within that monitoring period.

It is therefore clear that the intensification of the existing employment site, will not result in an additional need for local housing, particularly in consideration of the fact that the Council are significantly behind in the delivery of the stated policy requirements for industrial and warehousing development within Policy EM1.

The Housing Trajectory 2013/14 to 2035/36 as at 31st March 2023 outlined in Table 1 of the Annual Monitoring Report does not envisage the delivery of any residential units on the site within the Plan period.

- **The Existing Use** - The building on the eastern half of the site currently sits within employment use. This is the baseline position and the legal fallback. It is established and obvious law that a fallback position is capable of comprising a material consideration in the determination of a planning application. The Council is obliged to have regard to the fallback position in order to determine what the applicant is lawfully able to do without planning permission being granted for the proposed development. The Courts have held that: (1) it is necessary to consider whether there is a real prospect of the fallback development; (2) in doing so, the Court must resist a prescriptive or formulaic approach and must keep in mind the scope for a lawful exercise of judgement by a decision-maker; and (3) for a prospect to be a real prospect it does not have to be probable or likely, but a possibility will suffice.

As noted above, there is no intention of bringing the site forward for residential purposes. Should this application not proceed, the application will remain in employment use. The legal fall back is therefore a compelling consideration of substantial weight.

- **Requirement for a range of employment units sizes** - Policy EM4 (Maintaining a Variety of Premises) seeks to ensure that a range of types and sizes of units should be present in the Borough, and proposals should maintain or enhance this range. In particular, the overall level of start-up and grow-on space should be maintained and, **where possible, increased**, and any loss of small units should be offset by new provision" and that "*proposals for redevelopment of older industrial units for more flexible employment premises will be acceptable*". The scheme directly responds to these policy aspirations.

- 4.12 In summary, land allocated under Policy WR3b is not available or viable for the use as residential use proposed. Modifications are required to remove the remove the proposed allocation of the site for residential purposes under Policy WR3b and the site re-designated as part of the core employment area in line with its extant use.

5. Representations to Local Plan Update Policies

- 5.1 Within this section, comments are provided by CBRE IM in relation to other policies within the Local Plan Update.
- 5.2 For the avoidance of doubt, some policies within the Reading Local Plan Update are not referenced in this statement as CBRE IM do not wish to make any representations on them at this time. Although some general comments are made with the intention of assisting the authority, the majority are made in the interests of the Site.
- 5.3 To highlight, CBRE IM are supportive of the ambition and objectives of the Local Plan Update, particularly the drive towards ambitious growth to support economic prosperity.

The Plan-Period

- 5.4 The proposed Plan-period is not consistent with national policy and it should be extended for the reasons set out below.
- 5.5 Paragraph 22 of the NPPF states:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.” (our emphasis)

- 5.6 The Planning Practice Guidance (PPG) reiterates this, stating:

“The National Planning Policy Framework is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period.” (our emphasis)

- 5.7 Reading Borough Council’s Local Development Scheme anticipates that the LPU would be adopted in October 2025. Notwithstanding that this is an ambitious timescale (designed), we note that it would fail to provide for a full 15 year period post-adoption, in the scenario where adoption is delayed (beyond 1st April 2026).
- 5.8 We therefore recommend the authority extend the Plan period in order to ensure that it provides for the necessary timeframe post-adoption.

Policy CC2: Sustainable Design and Construction

- 5.9 This Policy seeks to achieve ‘net-zero’ for all non-residential developments 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.”*
- 5.10 Further, the Policy requires full justification for demolition, noting that demolition only be acceptable where:

- The building is in such a poor state that it is not practical or viable to refurbish or re-use;
 - Such refurbishment or re-use would result in a similar amount or a greater amount of embodied carbon generation; or
 - Such refurbishment or re-use would result in a building with poor thermal efficiency resulting in a greater lifetime carbon emissions than would arise from a re-build. All applications for new-build commercial floorspace of 5000m² or more must include an embodied carbon assessment. This assessment must demonstrate that a score of less than 800kg/m² of carbon can be achieved with
- 5.11 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.
- 5.12 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.

Policy EM1 Provision of Employment Development

- 5.13 This Policy has been revised to reflect changes in timing of the plan period, nothing that provision made for a net increase of 30,000-86,000 sq m of office floorspace and 167,000 sqm of industrial warehouse and/or research and development space in Reading Borough for the period 2023 to 2041.
- 5.14 Supporting text at Paragraph 4.3.5 of the LPU notes that there is scope to accommodate *"full level of need within Reading borough. This conclusion has been reached primarily by the Housing and Economic Land Availability Assessment (HELAA) process, supplemented by other evidence where necessary"*. At present the only evidence base available to comment on through this consultation is the Reading Commercial Needs Assessment Volume A (Interim Draft, November 2024) prepared by LSH.
- 5.15 The findings of this report predicts a need of 227,917 sqm (without allowance for loss replacement and margin) to 403,870 sqm (including allowance for loss replacement and margin) of employment space (or 43.7 ha to 80.0ha) in the Borough of Reading, of which:
- 60,805 sqm to 93,450 sqm of E(g)(i) space (2.1 ha to 3.2 ha)
 - 25,638 sqm to 45,508 sqm of E(g)(ii) space (5.2 ha to 9.3 ha)

- 24,261 sqm to 28,274 sqm of E(g)(iii) space (4.9 ha to 5.7 ha)
- -15,390 sqm to 11,679 sqm of B2 space (-3.5 ha to 2.6 ha)
- 132,604 sqm to 224,860 sqm of B8 space (34.9 ha to 59.1 ha)

5.16 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.

5.17 Noting that this document remains in draft CBRE IM reserve the right to respond to further evidence as and when it becomes available.

Policy EM2: Location of New Employment Development

5.18 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.

Policy EM4: Maintaining a variety of premises

5.19 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 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.

EN19 Urban Green Factor

5.20 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.

5.21 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.

5.22 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.

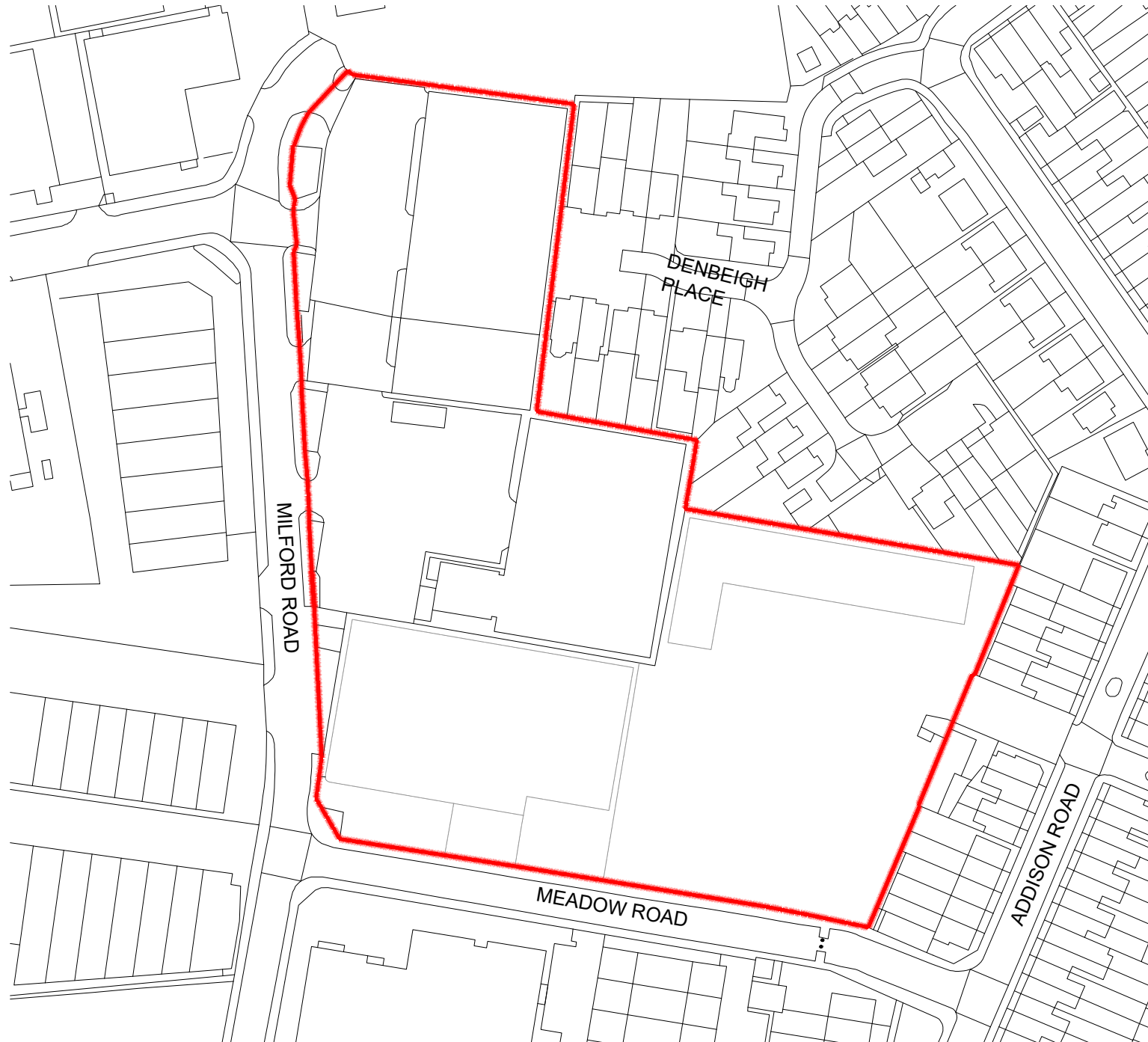
Viability Evidence

- 5.23 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 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.
- 5.24 CBRE IM reserve the right to respond to viability evidence as and when it becomes available.

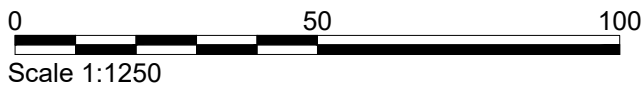
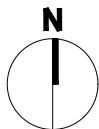
6. Summary

- 6.1 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.
- 6.2 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.
- 6.3 The following benefits would result from the development of the Site
- 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
 - 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;
- 6.4 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.
- 6.5 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).
- 6.6 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.
- 6.7 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.
- 6.8 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.

Appendix 1: CBRE IM Full Land Control



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Offices
Woking
London
Milton Keynes
Warsaw

Architecture
Planning
Master Planning
Urban Design
Interiors
Landscape

12 Warren Yard,
Warren Park,
Milton Keynes,
MK12 5NW
01908 305 246

info@prc-group.com
www.prc-group.com

Revisions:

Drawn/Chkd: Date:

Figured dimensions only are to be used. All dimensions to be checked onsite. Differences between drawings and between drawings and specification or bills of quantities to be reported to the PRC Group. The copyright of the drawings and designs contained therein remains vested in the PRC Group

Client:
V7 ASSET MANAGEMENT

Project:
MEADOW ROAD, READING

Drawing Title:
SITE LOCATION PLAN

Scale @ A3: 1:1250 Checked by: ME Date: OCT 24

Job No: 11677 Stage: FE Drawing No: 001 Rev:

Construction ☐ Preliminary ☐ Information ☐
Approval ☐ Tender ☐

PRC Architecture & Planning



Turley Office
Reading Office
The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 01189022830

Churchill Living

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

18th December 2024

Dear Sirs,

**CHURCHILL LIVING RESPONSE TO THE READING BOROUGH LOCAL PLAN
(REGULATION 19) CONSULTATION.**

Churchill Living is an independent housebuilder specialising in sheltered housing for older people. Please find below our comment on the draft policies within this consultation insofar as they impact the delivery of specialist accommodation for older persons.

CC10: Health Impact Assessment (HIA) (*Strategic Policy*)

Policy CC10 of the Local Plan (Partial Update) requires all major development or for proposals for accommodation for vulnerable people to be accompanied by an HIA.

It is a common misconception that older person's housing places a burden on healthcare infrastructure and therefore, rather than specifically requiring this type of accommodation to be accompanied by an HIA, we encourage Local Planning Authorities to recognise the health benefits that delivering older persons housing can bring to individuals.

In the recently published Older Persons Housing Task Force (dated 26th November 2024) it is highlighted that there is a proficient misunderstanding of the benefits of older persons housing, including the impacts to the NHS. In accordance with this, Extra Care Charitable Trust have commissioned a report which shows the benefits to older persons from improved physical and mental health in retirement communities, resulting in cost savings to the NHS. The independent study undertaken by Aston and Lancaster Universities¹ demonstrates the following findings:

- Annual NHS savings of 38% per person
- 46% reduction in routine and regular GP visits
- Significant improvement in the level of exercise done by residents (75%)
- Reduction in loneliness with 86.5% of residents acknowledging they were 'never or hardly ever' lonely.
- 14.8% reduction in depressive symptoms amongst residents after three years

In addition to this, housing specifically designed for older people offers significant opportunities to enable residents to live independently for longer. The Older Persons Housing Taskforce identifies that most senior citizens (over 90%) live in mainstream housing which is often unsuitable for later living, with only 9% having suitable features

¹ <https://www.extracare.org.uk/news/research-finds-older-people-less-anxious-more-active-and-less-likely-to-fall-in-retirement-communities/>

for individuals with mobility difficulties. It is also identified that 1 in 5 senior citizens live in poverty and in non-suitable housing, which comes at a significant cost to the NHS, estimated to be £1.4billion per year.

Similar findings are also reflected in “*Healthier and Happier: An analysis of the fiscal and wellbeing benefits of building more homes for later living*” by WPI Strategy for Homes for Later Living which explores the savings that the government and individuals could expect to make if more older people in the UK could access specialist forms of accommodation. The analysis shows that:

- Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.’

RECOMMENDATION:

In light of the above, and 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:

“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)”

Policy EN19: Urban Greening Factor

Policy EN19 requires all major developments that are predominantly residential to deliver a score of 25% in the Urban Greening Factor. The requirements of the policy are accompanied by an additional appendix which allows developers to calculate the Urban Greening Factor in line with the set criteria.

The Urban Greening Factor is a relatively new topic, which is predominantly seen within the London Plan (2021). Therefore, many developers will not have taken this into consideration for site viability.

Paragraph 4.2.124 does provide some examples of how the Urban Greening Factor can be achieved, for example through green roofs, trees, modified grassland, semi-natural vegetation (e.g. vegetation) and garden planting. This additional infrastructure often comes to the detriment of achieving suitable densities and can therefore materially affect viability.

When reviewing the Viability Study (2024), it is clear to see that this additional costing has not been considered within the viability calculation. This is not only disappointing to see but narrates that the introduction of the policy into the emerging local plan is premature and has not been duly considered.

It is acknowledged in the justification for Policy EN19 that the reasoning behind this policy is to ensure that sites with limited biodiversity value are able to demonstrate a sufficient increase in the levels biodiversity where BNG fails to do so. However, in

many cases, sites which can demonstrate a +10% in biodiversity net gain, as per national legislation, the requirement to then meet 25% Urban Greening Factor could be burdensome. On that basis, further guidance is required for developers to understand the implications of this additional green infrastructure, which must be considered in line the legislative requirement of achieving 10% gain in biodiversity.

In addition to the above, justification paragraph 4.2.123 states that a main contributing factor in the need for urban greening is to implement soft surfaces to positively impact rainwater storage and promote strategies to protect against climate change. However, soft surfaces are also a requirement as per the SUDs hierarchy, outlined in Policy EN18: Flooding and Sustainable Drainage Systems. Therefore, we question whether Policy EN19 needs to be so stringent given the requirement for SUDs under Policy EN18.

RECOMMENDATIONS:

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.”

Policy H2: Density and Mix (Strategic Policy)

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.

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.

RECOMMENDATIONS:

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).

“The provision of older persons housing, in accordance with the requirements of Policy H6, will be encouraged.”

Policy H3: Affordable Housing

The requirements of draft policy H3 seek 30% affordable housing on all sites of 10 or more dwellings. This further enhanced at point 3 which states any applicant unable to meet the full policy compliant affordable housing contribution will be subject to entering into a viability review mechanism.

This policy applies to older persons housing, as confirmed in Policy H6: Accommodation for Vulnerable People point IV, which states

“71% of the need for specialist older person housing units (other than residential care) is for affordable units. Affordable specialist housing for vulnerable people that meets these needs of, or another need identified in the most up to date Housing Strategy, may will count towards affordable housing provision in line with policy H3.”

Therefore, it is clear from both Policy H3 and H6 that specialist accommodation for older persons will be subject to meeting the full 30% affordable housing requirement or to provide a viability assessment is policy complaint on-site affordable housing was not achievable. This would then be further tested through a review mechanism.

We will begin by discussing the matter of older persons housing and viability. Within the Viability Study produced by BPS Chartered Surveyors on behalf of Reading Borough Council (published in December 2024), paragraph 4.41 identifies that specialist accommodation has the same profit assumptions as market sale residential housing. However, this is wholly inaccurate and therefore specialist accommodation has not been tested appropriately within the viability study.

We would like to direct the Council towards the Retirement Housing Consortium paper entitled ‘A briefing note on viability’ prepared for [Retirement Housing Group by Three Dragons](#), May 2013 (updated February 2016 (‘RHG Briefing Note’). The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables 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 and significantly variable benchmark land values. We are also aware that the RHG Briefing Note is being updated and indeed we are informing that process.

We therefore have the following comments on the assumptions that should be used within the Viability Assessment with respect to extra care and sheltered housing, as defined by the PPG on housing for older and disabled people Paragraph: 010 Reference ID: 63-010-20190626.

If the Viability Assessment was re-run using these assumptions extra-care and sheltered housing would be likely to be shown as less viable in terms of delivering affordable housing and would result in the council needing to consider a variable affordable housing target for specialist housing for older people or exempting it from affordable housing altogether.

We have engaged in considerable local plan representations over the last number of years and can point to a number of recently adopted or emerging local plans where suitable bespoke affordable housing policies have been brought forward.

We would draw the Council’s attention to Paragraph 5.33 of Policy HP5: Provision of Affordable Housing in the now adopted Fareham Borough Local Plan which advises that:

5.33... The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HP5 does not apply to specialist housing or older persons housing.

Furthermore, policy in Swale exempts older persons housing from affordable housing in light of viability constraints and emerging policy in BCP, Birmingham and Charnwood also exempt older persons housing from the provision of affordable housing.

BCP

The Local Plan viability assessment indicates that for greenfield sites we can continue to seek 40% affordable housing provision on site. For brownfield sites we will seek 10-15% affordable housing, but due to viability, this will not apply in Bournemouth and Poole town centres, or for specialist forms of housing (e.g. build to rent, student housing, care/nursing homes (Use Class C2) or for retirement housing (sheltered housing) and extra care (assisted living) housing (both Use Class C3).

Birmingham

Due to specific viability challenges of delivering older person's housing, the evidence suggests on the basis of market research, appraisal inputs and policy requirements, Older Persons Housing is exempted from Affordable Housing provision.

Charnwood

Our viability evidence shows that neither affordable housing nor extra care housing developments are likely to be viable if a contribution towards affordable housing is sought.

It is clear that in this case, a similar exemption should be examined to enable the typology to come forward.

The benefits of specialist older persons' housing extend beyond the delivery of planning obligations as these forms of development contribute to the regeneration of town centres and assist Council's by making significant savings on health and social care as well as the added benefit of enabling housing 'rightsizing'.

It is also worth considering that paragraph 008 of the PPG Viability section requires that when a viability assessment is submitted at the development management stage, reference is taken from the plan wide viability assessment underpinning the policy requirement and the applicant is required to set out what changes have taken place since the plan wide viability assessment was undertaken. In this case it is likely that the plan wide viability assessment would be entirely consistent with the application viability assessment. Therefore, by not adopting a different policy in respect of housing for older people, the policy is adding uncertainty and an unnecessary layer of cost and delay to such proposals.

RECOMMENDATIONS:

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.

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.'

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.

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.

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 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.

Review Mechanisms:

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.

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 1st April 2021, the Inspector noted in paragraph 17 that *'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'*.

RECOMMENDATIONS

The following text should be added to point 3 of Policy H3:

"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 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."

Policy H5: Standards for New Housing (Strategic Policy)

The Councils commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable and detailed at length within Policy H5, with the requirement to for new development to meet net zero emissions. However, the requirements as set out are significantly over the adopted Building Regulations and therefore we would expect to see this being tested within an accompanying Viability Report.

We must highlight that this significant uplift in energy efficiency is at odds to the Government's position on efficiency standards. This is highlighted at paragraph 2.70 of the Viability Report

A Government Ministerial Statement in December 2023 stated that plan-makers should not set local energy efficiency standards for buildings that go beyond current or planned Building Regulations. So local authorities should not set higher energy efficiency standards for new homes in their area if they do not have a well-reasoned and robustly costed rationale that ensures that development remains viable.

Despite the policy highlighting that should the requirements not be viable, then the highest possible standards are reached which should be demonstrated through an Energy Statement. However, PPG guidance requires the viability of policy to be undertaken during the plan making process, of which in this instance has not been undertaken. We would respectfully like to remind the Council of the increased emphasis on Local Plan viability testing in the NPPF and that the PPG states:

"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”(Paragraph: 002 Reference ID: 10-002-20190509).

Therefore, as the requirements stipulated within the wording of Policy H5 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.**

RECOMMENDATIONS:

We must request that the older persons housing typology is accurately tested and considered within a revised Viability Study.

Wheelchair Accessible Standards

Policy H5 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 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 H5. 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.

RECOMMENDATIONS

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.

Policy H6: Accommodation for Vulnerable People (Strategic Policy)

Paragraph 1 of the PPG Housing for Older and Disabled people states:

“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. Offering older people, a better choice of accommodation to suit their changing needs can help them

live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking”.

Paragraph: 001 Reference ID: 63-001-20190626

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.

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, alike the conclusions of many other 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.

Conclusions

The Reading Local Plan (Partial Update) acknowledges that the Reading Borough has an ageing population, and in line with the requirements of the PPG 'Housing for Older and Disabled People', the Council should seek to improve and provide sufficient support in the delivery of this type of housing.

Thank you for the opportunity for comment.

Yours faithfully

A black rectangular box used to redact the signature of Lauren Bishop.

Lauren Bishop
Planner – Planning Issues Ltd.

Conservation Area Advisory Committee (CAAC)

Rejwerska, Marcelina

From: Chair Reading CAAC <chair.readingcaac@gmail.com>
Sent: 12 November 2024 13:02
To: Planning Policy
Subject: chance to comment on the Local Plan Pre-Submission Draft Partial Update, November 2024 (Regulation 19)

Warning!
For the attention of
RBC, BFfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Dear Planning Policy

A couple of comments on the pre-submission draft on behalf of Reading CAAC.

1. **DUTY TO CONSULT** - On page 14 we are described as Conservation Area ACTION Committee when we are the **READING Conservation Area ADVISORY Committee**.
2. **SOUNDNESS (?)** - Q56 p236 - 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>

Best wishes

Evelyn

--

Evelyn Williams
Chair Reading Conservation Area Advisory Committee

@CaacReading
readingcaac.org

Corderoy, Louise

Rejwerska, Marcelina

From: Louise Corderoy [REDACTED]
Sent: 16 December 2024 13:44
To: Planning Policy
Subject: Local plan update for land in Kentwood Hill

Warning ! For the attention of RBC, BfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Good afternoon

As a local resident and allotment holder at the allotment land owned by TPLC I am writing to express my opinion that all of the land owned by TPLC needs to be given protection as local green space (vehicle access to the allotments needs to be maintained too.)

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!

Kind regards

Louise Corderoy
Sent from my iPad

Cottee, Jenny

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
12 December 2024

Dear Sirs,

Comments on Partial Update of Reading Borough Local Plan

I have rented an allotment on the land owned by the TPLC for 27 years. I have contributed to many consultations about two Reading Borough Local Plans at different stages of their development. Among the many things I have learnt in this time is that if the final document is clear and unambiguous money and time is saved.

I write now to contribute to this consultation only hoping to add clarity in a small portion of the plan regarding land use in West Reading. 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.*

Regarding the site **WR3s LAND AT KENTWOOD HILL**

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

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.

Thank you for your attention.

Yours sincerely

Jennifer Cottee

Dadd, Deborah

From: [REDACTED]
Sent: 18 December 2024 10:57
To: Planning Policy
Subject: Re: Reading Borough Local Plan – chance to comment on the Local Plan Pre-Submission Draft Partial Update, November 2024 (Regulation 19)

Warning!
For the attention of
RBC, BFfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Hi

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.

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 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.

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.

Thank you

Deborah Dadd

From: Planning Policy <planningpolicy@reading.gov.uk>

Sent: 06 November 2024 12:22

To: Planning Policy <planningpolicy@reading.gov.uk>

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

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 [\[reading.govocal.com/en-GB/projects/reading-borough-local-plan-pre-submission-draft-partial-update-november-2024\]](http://reading.govocal.com/en-GB/projects/reading-borough-local-plan-pre-submission-draft-partial-update-november-2024)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

Planning, Transport and Public Protection | Directorate of Economic Growth and Neighbourhood Services

Reading Borough Council

Civic Offices

Bridge Street

Reading
RG1 2LU

Tel: 0118 9373337
Email: planningpolicy@reading.gov.uk

[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)



D’Arcy-Darling, Sam

(Response from webform)

Title: Mr

First name: Sam

Last name: D'Arcy-Darling

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: 6.3.18

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: Yes

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: Yes

To which part of the Local Plan does this representation relate?: Rail Passenger Travel

Do you consider the Local Plan is legally compliant?:

Do you consider the Local Plan is sound?:

Do you consider the Local Plan complies with the Duty to co-operate?:

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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.

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.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary:

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Author name: Sam D'Arcy-Darling

De Joux, Alistair

(Response from webform)

Title: Mr

First name: Alistair

Last name: De Joux

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: Central Area and West Reading / Tilehurst; general

Do you consider the Local Plan is legally compliant?:

Do you consider the Local Plan is sound?:

Do you consider the Local Plan complies with the Duty to co-operate?:

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

I wish to comment but am unable to do so by the deadline due to work demands leading up to the Christmas and New Year period. Would it be possible to provide a late submission on aspects of the draft Plan that I have noted above ?

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: Yes

To which part of the Local Plan does this representation relate?: General policies

Do you consider the Local Plan is legally compliant?:

Do you consider the Local Plan is sound?:

Do you consider the Local Plan complies with the Duty to co-operate?:

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

I wish to comment but am unable to do so by the deadline due to work demands leading up to the Christmas and New Year period. Would it be possible to provide a late submission on aspects of the draft Plan that I have noted above ?

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary: I make verbal representations, particularly if it is not possible to accept a late written representation.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Author name: Alistair de Joux

Drukker, Mark

(Response from webform)

Title: Mr

First name: Mark

Last name: Drukker

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: 4.2.76 EN14

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

No mention of closeness of trees to buildings/

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Trees should not be too close to, and damage, buildings, and should be monitored for damage.

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: Yes

To which part of the Local Plan does this representation relate?: 4.4.85 H50

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Little emphasis of the need for gardens

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Every house should have front and back gardens

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: Yes

To which part of the Local Plan does this representation relate?: 4.5.6 TR2

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

There should be extra railway stations to reduce road traffic

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Add a Southcote railway station on Burghfield Road, and support the addition of a railway station at Thames Valley Business Park

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: Yes

To which part of the Local Plan does this representation relate?: 4.5.8

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

BRT does not stop at the right places

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

BRT should have extra stops where it passes shops, offices and sports grounds, and connect with local buses

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: Yes

To which part of the Local Plan does this representation relate?: 4.5.20

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Not enough car parking

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

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.

Please upload any supporting information (if necessary).

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary:

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Author name: Mark Drukker

From: [REDACTED]
Sent: 16 December 2024 20:46
To: Planning Policy
Subject: Local Plan Consultation

Warning!
For the attention of
RBC, BfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Planning Policy,

I have been adding to my responses online to the Local Plan Update consultation. After I added 5 points, the website did not allow me to add any points.

Here are my additional points:

4.6.24 More needs to be said for Walking.

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.

5.3.34 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.

5.3.39 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.

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.

Fig 6.1. BRT should not go round the estates. BRT should go through the estates, serving traffic objectives.

9.3.11 Royal Berks Hospital has site problems. The current Royal Berks Hospital suffers from subsidence due to the chalk mines below.

Regards,

Mark Drukker.

Elder

18 December 2024

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

The Savills logo consists of the word "savills" in a lowercase, red, sans-serif font, positioned on a solid yellow rectangular background.

Mark Thomson
E: mark.thomson@savills.com
M: +44 (0) 7464 675506

By Email: planningpolicy@reading.gov.uk

33 Margaret Street W1G 0JD
T: +44 (0) 20 7499 8644
F: +44 (0) 20 7495 3773
savills.com

Dear Sir / Madam

REPRESENTATION ON BEHALF OF ELDER TO READING BOROUGH LOCAL PLAN PARTIAL UPDATE (REGULATION 19) CONSULTATION

We are instructed by our client, Elder, to submit representations to Reading Borough Council ('the Council') in respect of the Pre-Submission Draft of the Partial Update to the Local Plan at Regulation 19 Stage, which is currently being consulted upon until 18 December 2024. For completeness, we can confirm we submitted representations to the Regulation 18 in January 2024 on behalf of our client, and this representation seeks to supplement the information previously submitted.

Our client, Elder, has an interest in the site known as 20-30 Greyfriars Road, Reading RG1 1NS (hereafter referred to as 'the site'), which has been subject to detailed and on-going discussions with the Council in respect of proposals to deliver a high quality co-living development. Further to this, there is a current pending planning application under reference number PL/24/1501 for the following development:

Demolition of the existing building and the erection of a part-7, part-13 storey co-living building (Sui Generis) and associated communal amenity facilities, refuse storage, cycle parking and plant equipment.

This application is currently being consulted upon until 19 December 2024, with the target determination date being 10 February 2025.

The following section outlines our representations and is structured to respond to policies set out within the Pre-Submission Draft Version of the Local Plan Partial Update.

Representations

Vision, Objectives and Spatial Strategy

Policy H15: Purpose-Built Shared Living Accommodation

In line with our representations made to the Regulation 18 Consultation, our client is strongly supportive of the inclusion of a specific policy relating to Purpose-Built Shared Living Accommodation (hereafter referred to as 'co-living').

We are broadly supportive of the text and criteria that is set out within policy H15. Below, we provide some commentary and justification on a number of suggested minor amendments to be made to specific parts of the policy.

- 1. *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;***

In line with our representations made at Regulation 18 Stage, we acknowledge that the Council is seeking to introduce this criteria to avoid co-living competing with Class C3 uses on allocated sites. However, if the site is located within the town centre, or on an edge-of-centre site (as covered by the criteria 2) then this policy criteria should allow for co-living to be justified on sites with residential allocations or permissions on the basis that it is demonstrated that the co-living development would:

- (i) meet an identified housing need;
- (ii) contribute towards mixed and inclusive communities; and
- (iii) deliver the same or better quantum of housing delivery or would be in addition to the anticipated residential.

Furthermore, in the current market, there are sites that may have traditionally been identified for general residential use, or may have extant permissions dating back several years which may no longer be viable to deliver. In these instances, there may be a possibility that the delivery of a co-living development may be one of the only viable ways for any development to take place on these sites. As such, we also suggest adding that developments on such sites should also be permitted on the basis of providing viability evidence showing that the a residential scheme would not be viable on the site.

- 9. *A contribution is made to provision of affordable housing at an equivalent level to policy H3. This will form an off-site financial contribution, unless on-site self-contained affordable dwellings can be provided that do not rely on, and operate independently from, the internal communal facilities.***

Draft Policy H3 states that residential development will make appropriate contribution towards affordable housing, and on sites of 10 or more dwellings, 30% of the total dwellings will be in the form of affordable housing. It is therefore considered that this policy seeks to secure a financial contribution from co-living developments at the equivalent level of 30% affordable housing. The Affordable Housing SPD (2021) provides more detail on how any financial contribution should be calculated.

In line with our representations made at Regulation 18 Stage, and as included within the submitted application proposals for this site, it is our view that as an alternative to offering a financial contribution for off-site affordable housing, co-living developments should also be allowed to contribute towards affordable housing on-site at a discounted market rent, in the same way as Build-to-Rent developments. This is not currently supported by the draft policy text which only supports on-site affordable housing in the form of ‘*self-contained units that do not rely on, and operate independently from, the internal communal facilities*’, i.e. separate self-contained C3 units. It should be noted that draft Policy H4 provides support for Build-to-Rent developments to provide discounted market rent units on-site.

The NPPF defines Build-to-Rent as ‘*purpose built housing that is typically 100% rented out*’, and that it will ‘*typically be professionally managed stock in single ownership and management control*’. It is considered that co-living can also be defined in the same manner in being 100% rented out, and being retained in single ownership and management control. As such, operationally, there is no reason why the affordable housing provision in a co-living development cannot be delivered as on-site discounted market rent units. In our view, and as supported by other consents, discounted market rent co-living units meet the definition of affordable housing, as defined by the NPPF.

Over the past few years, the co-living market has continued to evolve and mature, and there are now several implemented and operational co-living developments across the UK where on-site discounted market rent co-living units have been promoted and successfully integrated into developments, including:

Scheme	Planning Reference	Discounted Rent	Market	Comments
The Mall, Ealing	210038FUL	35% on-site discounted coliving		Rents at London Living Rent levels Operational and occupied
Folk Earlsfield, Wandsworth	2019/1083	35% on-site discounted co-living		70-90% of market rent Includes 5 homes offered to Children's Services clients. Operational and occupied
Guildford Plaza, Guildford	21/P/01811	40% on-site discounted co-living		Under construction DMR units aimed at key workers who do not qualify for social housing
Folk, Woking	PLAN/2023/0645	10% on-site discounted co-living		Consented 80% of market rent
Olympian, Bristol	23/02827/F	20% on-site discounted co-living		Consented 80% of market rent, linked to LHA rates

Based on the above, it is clear that on-site discounted market rent units can be viably integrated into operational co-living developments. Equally, it demonstrates that discounted market rent co-living is suitable, appropriate and acceptable as a form of housing that can meet affordable housing needs.

The benefits on providing on-site discounted market rent units, particularly in town centre or edge of town centre locations where Policy H15 seeks to direct co-living developments, will be the ability to offer affordable housing units in a central location for single-person households, which is a form of affordable housing that is not commonly offered.

Research produced by Savills included at the end of this letter, and submitted to the Council as part of the planning application, outlines that there are over 27,000 key workers employed within Reading, equating to 30% of the total workforce. Large local employers of key workers include Royal Berkshire Hospital and the University of Reading (both a short distance to the south of the town centre) as well as other various schools and health providers.

The research finds that key workers have seen their pay fall relative to other workers, and this is particularly pertinent when viewed alongside increases in rental values. The increase in rental prices means that homes in Reading are hugely unaffordable for key workers, and that living alone in the private rented sector in Reading is practically impossible for those on lower incomes.

Assuming key workers would spend 35% of their gross income on rent and bills, research finds that an unqualified teacher or pharmacy technician would not be able to afford any studios or 1 beds on the market. By way of illustrating, a community staff nurse would only be able to afford 8% of studios and 2% of 1-bedroom flats on the market. Owing to this, key workers are forced to find lower standard/poor quality housing in HMOs, or living far from their place of work with extra costs associated with travel.

Through the provision of discounted market rent rooms over a range of discount levels, e.g. between 60-80% of market rent, there would be the ability to provide a range of rooms which would be affordable to a range of

key workers across the income scale such as newly qualified nurses at the lower end and experienced paramedics at the higher end of the scale.

In light of the above, it is clear that the provision of on-site discounted market rent co-living units can be suitably integrated and delivered as part of co-living schemes, and can offer significant tangible benefits in delivering single-person accommodation for key workers and other individuals who may otherwise not be able to afford to live in such high-quality and sustainably located accommodation. The quality of the rooms, the flexibility in tenancy lengths and community lifestyle are all well-suited for affordable key worker housing. It is therefore proposed that the policy wording should be amended to include the possibility of providing on-site discounted market rent co-living units.

It is noted that the policy states that the provision of on-site affordable units would only be acceptable where this is in the form of self-contained units that do not rely on, and operate independently from, the internal communal facilities, i.e. separate self-contained C3 units. In practice, depending on the size and nature of the site and development, such as a single building on a constrained town centre site, this could be difficult to implement as self-contained C3 units within the same building would require a separate core, entrance and management, which will adversely impact the efficiency, management and viability of any co-living scheme. However, on a larger multi-block development inclusion of C3 may be more efficient and viable, opposed to a payment in lieu or on-site discounted market rent. Therefore, the policy needs to have flexibility for alternative approaches, which all result in the delivery of much-needed accommodation to meet the variety of needs for affordable accommodation.

Beyond the submitted research, we can confirm that the demand, need and interest for key worker accommodation in Reading is tangible and real. Savills alongside Elder have met with Royal Berkshire Foundation Trust and Berkshire Healthcare NHS Foundation Trust who are supportive and interested in the proposed discounted market rent shared living units included within the application for this site. Discussions to-date have highlighted the need for purpose built high quality accommodation in Reading that can meet their staffs' needs, whilst being flexible and affordable. It has been clear from the discussions that the accommodation will help with staff retention, which is key to the important services provided, as well as helping promote and safeguard the well-being and mental health of their staff.

Based on the above, we therefore include a number of minor amendments to draft Policy H15 in tracked changes form, with changes shown in red:

Development for purpose-built shared living accommodation will meet all of the following criteria:

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:**
 - 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.**
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;
3. It provides units for rent with minimum tenancy lengths of no less than three months;
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:

- Communal kitchen and dining facilities
 - Laundry and drying facilities
 - A concierge
 - Cleaning, maintenance and security services
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;
 6. It is under a single management regime;
 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;
 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
 9. A contribution is made to provision of affordable housing at an equivalent level to policy H3. **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:
 - 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.**

Policy CR11: Station/River Opportunity Area

We support the Council's continued allocation for the Station/River Opportunity Area as an area presenting significant potential for redevelopment centred around Reading Station for a mix of commercial and residential uses.

In 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.

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.

Conclusion


Elder generally supports the Local Plan Partial Update, and the Local Planning Authority's inclusion of a new co-living policy. However, the exact detail and wording of the policy requires amending, and given our experience in the sector, alongside Elder, we would be happy to meet and discuss the potential policy with officers.

We would welcome the opportunity for further discussion and engagement with the Council to discuss the representations in this letter and how the next iteration of the Plan could respond to the requested changes and issues raised.

It would be appreciated if you would acknowledge receipt of this letter of representation. We reserve the right to supplement this letter at a later date, if required. Furthermore, we reserve the right to attend any future examination.

If there are any queries, please do not hesitate to contact me or my colleague Fergus Wong. Please note that as we are currently acting on behalf of Elder in respect of the above site, we request that all future correspondence for matters concerning this site be directed to Savills.

Yours faithfully,

A solid black rectangular box used to redact the signature of Mark Thomson.

Mark Thomson MRTPI
Director

Reading has 27,000 key workers who have seen their pay fall relative to other workers and particularly vs the increases seen in rental values

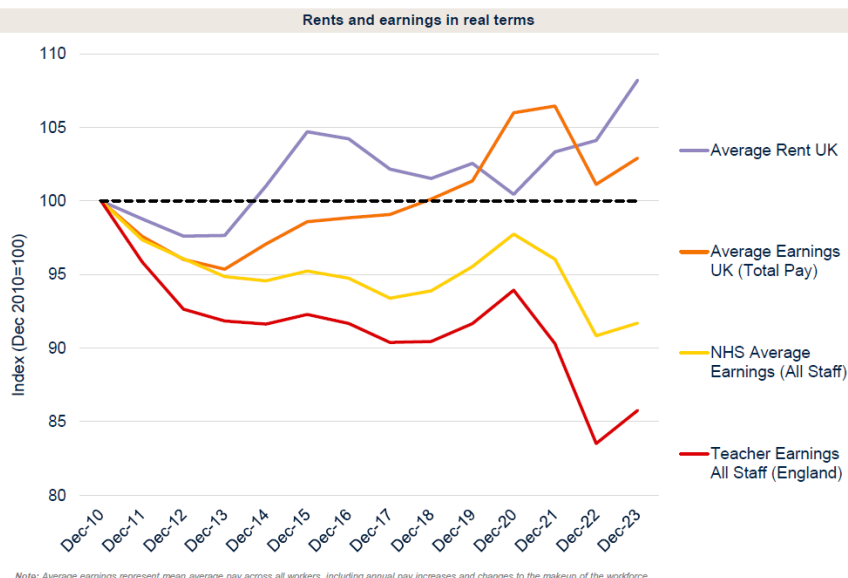


Reading has 27,000 workers employed as key workers. This is equal to 30% of all workers. Large local employers of key workers include Royal Berkshire Hospital and the University of Reading (both a short distance to the south of the town centre) as well as other various schools and health providers.

Across the South East, around half of workers are employed in either health and social care or education and childcare.

For those living in the private rented sector (PRS), they have seen rents rise and earnings fall in real terms. This has squeezed incomes, worsened the cost-of-living crisis and pushed the reality of home ownership further and further away.

Employment sector	% of the total (South East)
Health and social care	27%
Education and childcare	23%
Utilities and communication	19%
Food and necessary goods	12%
Transport	7%
Public safety & national security	6%
Key public services	4%
National and Local Government	2%



Source: Savills Research using data from NHSE, DfE, ONS and Zoopla Rental Index powered by Hometrack

2

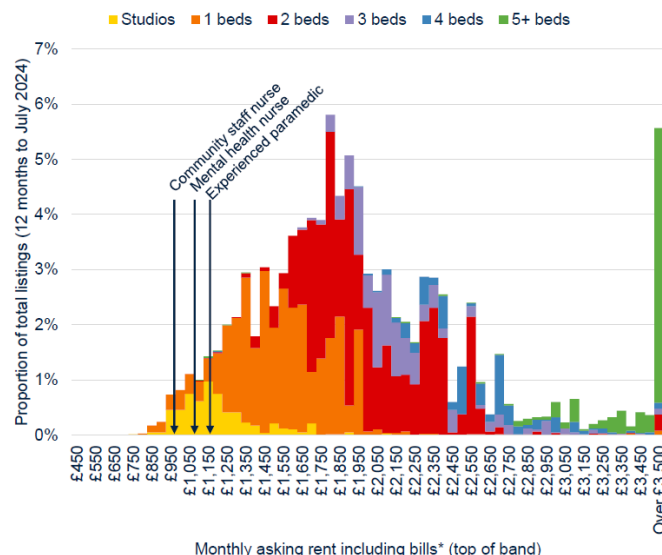
Rental values across Reading mean key workers have little choice and can afford only a small proportion of the market



The stark reality of rental values means homes are hugely unaffordable for key workers. Living on your own in the PRS is therefore difficult for many, particularly those on lower incomes.

We have assumed key workers spend 35% of their gross income on rent and bills, to understand the proportion of the market that would be affordable. For a community staff nurse with an income of £32,324 they would be able to afford £943pcm on rent. This would mean just 8% of studios and 2% of 1 beds would be affordable.

	Annual income	Monthly rent affordable (35% of gross income spent on rent)	% of studios that are affordable	% of 1 beds that are affordable
Community staff nurse	£32,324	£943	8%	2%
Mental health nurse	£36,025	£1,051	29%	4%
Experienced paramedic	£39,404	£1,149	54%	7%



Source: Zoopla, NHS, TES, *includes council tax, gas, electricity, water, wifi, tv licence

3

Ellis, Liz

7. WEST READING AND TILEHURST

7.2.4 It is considered that West Reading and Tilehurst can accommodate around 1,900 homes between 2023 and 2041, around 13% of the total planned for (this includes 45 dwellings that were completed between 2023 and 2041).

Park Lane Primary School, The Laurels and Downing Road
WR2: PARK LANE PRIMARY SCHOOL, THE LAURELS AND DOWNING ROAD

The main Park Lane School Site will be redeveloped for residential purposes (15-20 dwellings) with access off Downing Road and Chapel Hill. Development should address the practicality of retaining elements of the existing building within any new scheme.

My comment re the above section 7.2.4:

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.

7.3.6 As part of a major rationalisation project, it is proposed to build a replacement 2FE primary school on the site of The Laurels incorporating the existing Blagrove Nursery, Tilehurst Library and Tilehurst Health Clinic and utilising, and reconfiguring, part of the existing recreation ground for school playing fields and outdoor play. **The existing Blagrove Nursery school site would be returned to public open space and incorporated into Blagrove Recreation Ground.** The scheme will provide new, bespoke designed school buildings, in conjunction with the required external playing field areas sufficient to meet the minimum requirements for a school of this size along with a new 2-court MUGA hard court provision.

My comment re section 7.3.6 :

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 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.

Environment Agency

Mr Mark Worringham
Principle Planner - LDF
Reading Borough Council
Planning Manager
Civic Offices Bridge Street
Reading
Reading
RG1 2LU

Our ref: WA/2006/000005/PO-
06/SB1-L01
Your ref: Partial update Reg 19
Date: 17 December 2024

Dear Mr Worringham

Reading Local Plan Partial Update – Regulation 19 Consultation

Thank you for consulting the Environment Agency on the Reading Local Plan Partial Update – Regulation 19 Consultation. We understand that Reading Borough Council is partially updating its local plan, therefore parts of the plan are proposed to be updated whilst other parts are not proposed to be updated.

Further to our comments

- provided at Regulation 18 stage, (letter with reference WA/2006/000005/PO04/PO1-L01, dated 9 February 2024)
- in post- regulation 18 discussions around policy EN18 (letter with reference WA/2006/000005/PO05/PO1-L01, dated 30 September 2024, and email RE: Reading Borough Council Local Plan Review, dated 30 September 2024) and
- regarding the Reading Borough Council Strategic Flood Risk Assessment Level 1 (letter with reference A/2006/000005/SF02/IS1-L01 and ENVPAC/1/THM/00736, dated 19 November 2024),

we have been reconsulted on this Regulation 19 stage and the following documents, have been reviewed:

- updated draft Local Plan with tracked changes Local Plan Partial Update (Consultation on the Pre-Submission Draft (Regulation 19), November 2024 which can be found on the council's website here: [Local Plan Partial Update - Reading Borough Council](#))
- Reading Borough Local Plan Partial Update Pre-Submission Draft Proposals Map (November 2024)
- Sustainability Appraisal of the Local Plan Pre-Submission Draft Partial Update (Regulation 19) (November 2024)

Did you know that in the UK, 6.6 million tonnes of household food waste a year is thrown away? Almost three quarters of that is food which could have been eaten. Do your bit to avoid domestic food waste to fight climate change! www.lovefoodhatewaste.com www.wrap.org.uk

- Draft Infrastructure Delivery Plan (Local Plan Pre-Submission Draft Partial Update (Regulation 19 Consultation)) (November 2024)
- Reading Borough Council Reading Level 1 Strategic Flood Risk Assessment version 1.2 (26 November 2024).

At Regulation 18 stage, we provided comments relating to the parts of the Local Plan being updated. We also highlighted other policy areas which would need to be updated to make the plan fit for purpose, namely policies EN11 Waterspaces, EN16 Pollution and Water Resources, EN18 Flooding and Drainage and H13 Provision for Gypsies and Travellers. Amendments have been made to policy EN18 but the other policies have not been updated and therefore we submit separate representations on soundness points regarding policies EN11, EN12, EN16, EN18 and H13.

Therefore, accompanying this letter are specific Environment Representation Forms as follows:

- EA representation Policy EN11
- EA representation Policy EN12
- EA representation Policy EN16
- EA representation Policy EN18
- EA representation Policy H13
- EA representation – Caversham and Emmer Green Allocation Policies
- EA representation – Central Reading Allocation Policies
- EA representation – East Reading Allocation Policies
- EA representation – South Reading Allocation Policies
- EA representation – West Reading and Tilehurst Allocation Policies.

We would also like to provide you with the following comments which are not soundness points but useful for clarity and accuracy purposes. Please refer to the comments below on points other than on issues of soundness.

Policy OU2

We have reviewed policy OU2 Hazardous Installations and are happy with the proposed wording of this strategic policy.

Policy H5 section 4.4

We have reviewed policy H5 Standards for Housing and are satisfied regarding paragraph 4.4.45 (mislabelled as 4.4.44) of policy H5.

Policy EN16

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.

Policy EN18

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.

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"**.

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 assesses 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.

Allocation sites

WR3u (Land at 132-134 Bath Rd), SR2 (Land North of Manor Farm), SR4b (rear of 3-29 Newcastle Road) and CA2 (Caversham Park):

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.

Policy CC3

The information about fluvial flood risk could be expanded upon when discussing adapting for climate change (CC3).

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.

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.

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.

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.

Policy 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.

IDP Infrastructure Delivery Schedule

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.

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.

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.

Sites with existing planning permission

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.

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.

Final comments

We trust that the above and attached comments are useful.

We would like to highlight that our aim is to assist you in preparing and implementing a sound, robust and effective plan that is reflective of national policy so that it may deliver sustainable development in Reading.

We hope to work with you on producing a plan which is sound and fit for purpose and therefore if you have any questions, please do not hesitate to contact me.

Yours sincerely

Sarah Warriss-Simmons
Planning Advisor

Direct dial 0203 025 9855

Direct e-mail Planning_THM@environment-agency.gov.uk

Model Representation Form for Local Plans

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Name of the Local Plan to which this representation relates:

Reading Borough Council
Local Plan Pre-Submission
Draft Partial Update
Regulation 19

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Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Mrs	
First Name	Sarah	
Last Name	Warriss-Simmons	
Job Title (where relevant)	Planning Advisor	
Organisation (where relevant)	Environment Agency	
Address Line 1	Red Kite House	
Line 2	Howbery Park	
Line 3	Benson Lane	
Line 4	Crowmarsh	
Post Code	OX10 8BD	

Telephone
Number

E-mail Address
(where relevant)

planning_THM@environment-
agency.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy **EN11** Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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.

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.

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.

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.

We have provided further comments in box 6 below.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To ensure this policy is robust and fit for purpose and in line with NPPF Framework 15, we ask that the following changes are applied.

Bullet point 6 of policy EN11 should be changed to read; - Be set at least ten metres back from the watercourse ~~wherever practicable and appropriate~~ to protect its biodiversity significance.

The policy justification notes can then highlight that where a/the site is constrained there can be exceptions however it is important to emphasise that the requirement is for a 10-metre buffer in the first instance.

Include a bullet point under policy EN11 about biodiversity net gain. The point should highlight that if there is a watercourse or a river and a riparian zone within the site boundary, then the watercourse part of the statutory biodiversity net gain metric 4.0 [now statutory biodiversity metric] must be completed and an increase of at least 10% biodiversity net gain must be provided. It must also be accompanied with appropriate literature to show how the enhancement will be achieved and how it will be secured for 30 years. Whilst we appreciate that policy EN12 includes BNG requirement, it is important for this to be emphasised as a requirement for water environment enhancement.

Paragraph 4.2.48 should be amended to read:

'Land uses adjoining the watercourses will contribute to the creation of attractive and highly accessible waterside environments, within which people can feel safe and comfortable. Buildings should face onto the water and present active frontages along the Kennet, with ground floor uses designed to enhance activity and life along this corridor. Uses and facilities along the Thames will be diversified, seeking to provide a greater variety of leisure activities and facilitating public use and recreation. 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.'

Paragraph 4.2.51 should be amended to read:

'The wildlife function of the watercourses is also vital. There is also a clear relationship between this policy and EN12 on Biodiversity and the Green Network, as the main watercourses are identified as green links within that policy, vital for wildlife movement. In order to enhance this biodiversity role, development must provide an ecological buffer zone, at least 10m wide (wider if possible) from the top of each bank, unless there is a valid reason and robust evidence as to why this cannot be provided should be set at least ten metres back from the bank where possible and appropriate. In this case, development refers to buildings, fences and walls as well as laying of non-permeable surfaces. Ideally, unless direct access to or along the waterside is of particular significance on a site, a buffer should be maintained as a natural or semi-natural habitat free from built development, parking areas, private gardens and formal landscaping. Additionally, where a watercourse runs through a proposed development, an ecological buffer shall be provided on both banks. There should be a long term landscape and ecological management plan for this buffer'.

Section 4.2.51 [now 4.2.52] states 'Where barriers to fish are present in a watercourse adjacent to development proposals, the design should include measures to allow for the natural movement of fish within the watercourse'. The justification notes should include a hierarchy of options. For example, removing the barrier is what we recommend however where this is not possible, a naturalised bypass channel should be proposed over a technical pass, or similar which should be last option.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

For the opportunity to further explain our reason why we require this policy to apply the changes we have suggested. In summary it is to protect and enhance the water environment in Reading.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Mrs	
First Name	Sarah	
Last Name	Warriss-Simmons	
Job Title (where relevant)	Planning Advisor	
Organisation (where relevant)	Environment Agency	
Address Line 1	Red Kite House	
Line 2	Howbery Park	
Line 3	Benson Lane	
Line 4	Crowmarsh	
Post Code	OX10 8BD	

Telephone
Number

E-mail Address
(where relevant)

planning_THM@environment-
agency.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy **EN12 Biodiversity** Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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.

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.

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.

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.

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. This should be another bullet point as it ensures the provision of native and wildlife friendly landscaping next to waterbodies.

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.

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.

We have provided the required amendments in box 6 below.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The following amendments should be made to policy EN12:

b) *'Biodiversity Net Gain On all development sites, a 10% Biodiversity Net Gain (BNG) must be achieved, except that which is exempt as set out within The Biodiversity Gain Requirements (Exemptions) Regulations 2024. The 10% BNG should be delivered on-site wherever possible. However, if on-site provision is not achievable, or Readings Green Network can be more coherently enhanced through off site provision, off-site gain can be pursued, in accordance with the Biodiversity Gain Hierarchy. Where practicable off-site provision should be directed towards areas within the borough and identified in the Council's Natural Environment SPD, BLNRS (or Biodiversity Opportunity Areas (BOAs) until such a time as the BLNRS and the SPD is in place).*

Notwithstanding the above development that results in the loss or deterioration of 'irreplaceable habitats' will not be permitted. There needs to be 10% in all sections of the metric and they cannot be used interchangeably. Also, 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.'

c) *'Wildlife friendly design*

Unless there are clearly justifiable reasons for not doing so, development must:

- *Protect and enhance features of biodiversity interest on and adjacent to the application site;*
- *Provide new native tree planting;*
- *Provide wildlife friendly landscaping using wildlife-friendly species (native as a priority) as appropriate;*
- *Provide permanent bird and bat boxes wherever practicable;*
- *Provide wildlife friendly landscaping using wildlife-friendly species (native as a priority) as appropriate; and ecological enhancements opportunities integral within new buildings; and*
- *Avoid increasing, and reduce, artificial light at night in particular over trees, hedgerows and waterbodies'.*

d) *'Waterbodies*

Unless there are clearly justifiable reasons for not doing so, development must:

- *Not increase artificial light at night over waterbodies, and reduce it wherever practicable*
- *Provide native and wildlife friendly landscaping corridors adjacent to waterbodies. These buffer zones should be at least 10m wide and be left free from any development and formal landscaping, and be managed for the benefit of wildlife in the river and the riparian zone.*
- *Re-naturalise the banks of waterbodies when new development is adjacent to it wherever possible. – Re-naturalisation must be carried out over the use of hard bank and if a hard bank has collapsed, a softer, more ecologically friendly alternative should be looked at to replace the hard bank.*
- *~~Not cover over watercourses~~ Not culvert watercourses and de-culvert watercourses wherever possible.'*

4.2.66 *'The Statutory Metric is a spreadsheet tool for calculating habitat losses or gains from a project using habitats, measured using Habitat Units as a proxy measure for biodiversity. It is accompanied by an excel spreadsheet calculator that assigns values to habitats before a change and assumed habitat values after the change. Development needs to result in a net gain in Habitat Units as measured with the Statutory Metric. There must be a net gain in Hedgerow and Watercourse Units, as well as Habitat Units, where relevant, as they are all separate.'*

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

For the opportunity to further explain our reason why we require this policy to apply the changes we have suggested. In summary it is to protect and enhance the important wildlife habitats including woodlands, grasslands and wetlands in Reading.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Sarah"/>	<input type="text"/>
Last Name	<input type="text" value="Warriss-Simmons"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Planning Advisor"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Environment Agency"/>	<input type="text"/>
Address Line 1	<input type="text" value="Red Kite House"/>	<input type="text"/>
Line 2	<input type="text" value="Howbery Park"/>	<input type="text"/>
Line 3	<input type="text" value="Benson Lane"/>	<input type="text"/>
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Post Code	<input type="text" value="OX10 8BD"/>	<input type="text"/>

Telephone
Number

E-mail Address
(where relevant)

planning_THM@environment-
agency.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	EN16 Pollution and Water Resources	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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. We have further explained this below.

In regard to the importance of protecting/ensuring water quality over the local plan period, 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.

Water quality/resources

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 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

During the post Regulation 18 stage discussions with Reading Borough Council, we set out that: *wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW.) Currently the Reading Sewage Treatment Works require upgrades to accommodate*

further growth in Reading. It is important for a Water cycle study to be produced to take account of discharges from new development being directed/added to the treatment network. This is in order to ensure that effluent discharge, from sewage treatment into the water environment in Reading does not exceed EA consented levels. The Water cycle study will demonstrate if there is enough wastewater capacity for new development – for example capacity to collect, transport and treat wastewater (both foul and surface water) and ensure there is adequate water supply for new developments. The evidence will then determine the policies the local development plan may need to include requiring; -discharges from new developments and growth that can be accommodated to discharge to the Reading STW which has enough capacity and - higher level of water efficiency for new housing.

We also highlighted in our response at the Regulation 18 stage-partial update to the local plan, the state of the Reading STW and the fact that any additional flows into an under-capacity network can result in situations such as rising main or pumping station failures, which can cause significant environmental damage. There is currently evidence to show that Reading STW discharges into the Foudry Brook which is it is at Poor status overall, and Poor for Phosphate. STW is also a 'Reason for not achieving good' (RNAG) status for the macrophyte element - (<https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039017380>). This highlights the fact that improvements must be made to the network to ensure these events occur before new developments come online. We also added that our main concern is with the performance and compliance of Reading STW. Actions have been identified to resolve those issues, and we expect those to be in place before the STW is put under more pressure from additional development. Similarly, any sewerage networks improvements that have been identified need to be completed as soon as practicable.

Table 3 in 'Wastewater' section of the Infrastructure Delivery Plan states there is room at Reading STW for growth. As stated above, we raised a concern with this at the Regulation 18 stage. Our comments are replicated below.

- 'Reading STW has a maximum permitted flow of 177,725 m³/d. In 2022 the maximum flow was 105,282m³/d and the average 63,752 m³/d. In 2021 (which was a wetter year) the maximum and average recorded flows were 128,663m³/d and 69,339 m³/d respectively. This suggests there is some capacity within the existing discharge permit for new development.

- 'The Environment Agency would like to convert the maximum flow value of the permit to a Dry Weather Flow (DWF). This is the standard and preferred method for Environmental Permits and helps us more accurately measure compliance. It is important that Thames Water engage with the Environment Agency as soon as possible to make this permit alteration.'

We are actively working to convert the maximum permitted flow permit at Reading STW to a Dry Weather Flow (DWF) permit. The assessment made by Reading Borough Council that there is room at Reading STW and it is based on the 177,735m³/d maximum flow permit is an inaccurate view of the remaining headroom at Reading STW. An assessment should be done by Reading Borough Council and Thames Water based on a realistic DWF conversion. There is growth within the Reading STW catchment, and there is less headroom in the permit than is being represented. Without assessing growth based on a reasonable DWF conversion, there is a risk that capacity issues at Reading STW could impact the growth over the Local Plan period.

This emphasises the need for an up to date water cycle study to be undertaken.

We note that no further update to EN16 or its supporting/justification text has been made. We are not aware of any new evidence base in particular a Water Cycle Study which has been undertaken to demonstrate that capacity issues have been assessed and been found to be acceptable.

Pollution prevention

This aspect of the policy should be further strengthened. Please refer to our comments in box 6.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Water Quality/Resources

An up-to-date water cycle study - evidence base is required to inform the proposed policy -EN16.

Evidence should be presented in a water cycle study to highlight the current issues around waste water disposal for current and proposed development and demonstrate the necessary actions to resolve issues including performance and compliance of Reading STW before further development occurs.

Pollution prevention

Policy EN16 on pollution prevention should be reworded as follows:

*Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution; where it would result in no deterioration in, or ideally enhance, **land quality, groundwater** and surface water quality; and where adequate water resources, sewerage and wastewater treatment infrastructure will be in place to support the proposed development prior to occupation.*

Proposals for development that are sensitive to the effects of noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution.

*Development will only be permitted on land affected by contamination where it is demonstrated that the contamination (**of land and/or controlled waters**) and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.*

Paragraph 4.2.102:

*Within the Borough there are a number of sites affected by contamination as a result of previous land uses **as well as land that is suspected of being contaminated in relation to activities or incidents involving hazardous substances**. In order to make the most effective use **and redevelopment** of ~~previously developed land within Reading affected by contamination~~, it will be important to ensure that, where possible, such land is remediated through the development process ~~so that it is suitable for redevelopment~~. **Where a site is affected by contamination, responsibility for securing safe and sustainable development lies with the developer and/or landowner**. Where a **proposed** development is known to be on historic contaminated land or **where** contamination could be an issue, the application will not be approved unless it is supported by proportionate but sufficient site investigation information **to complete a risk assessment. Developers will assess and manage the risks from land contamination following Land contamination risk management (LCRM) Guidance Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)**. The risk assessment should ~~also~~ identify **all of the potential sources, pathways and receptors, and any 'pollutant linkages'** ~~and evaluate the risks~~. This will determine the existence or otherwise of contamination, its nature and extent, ~~the risks it may pose and to whom/what (the 'receptors')~~ so that these risks can be assessed and satisfactorily reduced to an acceptable level. **Developers will be required to show that appropriate measures including remediation proposals, design changes, and controls have been planned or will be taken, to mitigate any adverse impact of potential contamination and/or activities involving hazardous substances, on sensitive receptors such as controlled waters or end-users of the development**. This information will enable the local planning authority to determine whether further ~~more detailed~~ investigation is required, or whether any proposed remediation plan and verification plan ~~report~~ is satisfactory. A risk assessment **for** land affected by contamination should inform an Environmental Impact Assessment if one is required. Some buildings, particularly tall buildings, may require piling. In some instances, due to contamination, piling may not be suitable unless remediation **and monitoring** is carried out to a suitable standard to protect **controlled waters**. Early pre-application engagement with the Council and Environment Agency is strongly advised.*

Paragraph 4.2.105:

*The provision of adequate water, wastewater, and sewerage infrastructure is critical, and needs to be in place prior to occupation. A Utilities Statement is required for all major development at application stage, and this will need to include the outcome of consultation with the sewerage undertaker **and water services provider**. Where there is a capacity constraint and improvements in off-site infrastructure are not programmed, the developer should set out how the infrastructure improvements*

will be completed prior to occupation of the development. The use of private sewage disposal facilities within publicly sewered areas will only be acceptable if the applicant can demonstrate that the additional cost of connecting to the sewer would be unreasonable, connection is not practically feasible or the proposed private sewerage system would provide additional environmental benefits that would outweigh the potential environmental risks.

We recommend that the following sections are added to the supporting text:

Soakaways and discharges: Controlled waters can be polluted by the discharge of solid or liquid pollutants onto land, via soakaways, direct into groundwater or surface water courses, or via other pathways. Good quality groundwater and surface water is crucial for water-dependent ecosystems and animals, and for the use of groundwater can be used as a source of drinking water, agriculture or industry. Drainage strategies must be designed with respect to each site's hydrogeological status, and use sustainable principles where possible. Any proposed site activities and Sustainable Urban Drainage Systems (SuDS) must be appropriate for the site, and designed in accordance with best-practice guidance. Early discussions with the Environment Agency and other appropriate regulators is advisable. Securing environmental permits for any discharges might also be required, and early consultation is recommended.

Groundwater resources protection: It is important that there are controls on developments which pose a risk to groundwater, to ensure an adequate and safe water supply. Groundwater feeds into both public and private water supplies. These supplies may be affected through pollution (or polluting activities) and may be depleted through surface water and drainage systems which do not allow for natural infiltration of water through soils. The most vulnerable groundwater sources are designated as Groundwater Source Protection Zones (SPZ). You can view the Environment Agency's groundwater SPZs on [MagicMap](#) and further information here: [Groundwater source protection zones \(SPZs\) - GOV.UK \(www.gov.uk\)](#). Development proposals located within an inner Source Protection Zone (SPZ1) or at sites where aquifers are sensitive and vulnerable, where there is highest a risk of potential pollution to groundwater, need to be designed appropriately. Early discussion with the Environment Agency and other appropriate regulators is advisable.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

For the opportunity to further explain our reason why we require this policy to apply the changes we have suggested. In summary it is to ensure the quality of the water environment and water resources in Reading are protected and enhanced.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Model Representation Form for Local Plans

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Name of the Local Plan to which this representation relates:

Reading Borough Council
Local Plan Pre-Submission
Draft Partial Update
Regulation 19

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Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Mrs	
First Name	Sarah	
Last Name	Warriss-Simmons	
Job Title (where relevant)	Planning Advisor	
Organisation (where relevant)	Environment Agency	
Address Line 1	Red Kite House	
Line 2	Howbery Park	
Line 3	Benson Lane	
Line 4	Crowmarsh	
Post Code	OX10 8BD	

Telephone
Number

E-mail Address
(where relevant)

planning_THM@environment-
agency.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy **EN18** Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="No"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="Yes"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We agree with the updates that have been made to policy EN18. We consider the policy wording to be adequate. We also support the conclusion of the Sustainability Appraisal regarding updating Policy EN18. However, we unfortunately must raise a soundness point as there is insufficient updated evidence to support this policy as required by national policy – NPPF paragraph 171.

To support the site allocations in the local plan in regard to flood risk, a Sequential Test should have been undertaken which demonstrates how sites have been selected as allocations in the local plan and then a Level 2 SFRA which demonstrates how development on these selected sites would be safe from the impacts of flood risk (which is the exception test). We are not aware that the Sequential Test has been undertaken and that the allocated sites in the updated plan have passed the Sequential Test as required in the NPPF (paragraphs 174-176). Also, we not aware that a level 2 SFRA has been undertaken to demonstrate that the allocated sites are safe in regard to flood risk as required in the NPPF (paragraph 178). We therefore consider the plan to be unsound because it is not justified and is inconsistent with national policy.

We have recently been consulted on the Level 1 SFRA and we have provided comments. We would highlight that the Draft Local Plan has been prepared prior to changes to the Revised Level 1 SFRA having been made. Any changes to the SFRA since the Local Plan was drafted may change the evidence upon which the Local Plan is based.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Local plan policy EN18 update must be supported by evidence of a Sequential Test and a Level 2 SFRA. It is a requirement of Local Plan site allocations that they are subjected to the sequential test before allocation. We note section 4.2.112 of the updated Local Plan states that the sequential test has been applied for the allocated sites. We are not aware that the Sequential Test has been undertaken and that the allocated sites in the updated plan have passed the Sequential Test. There is no documentation of this on the council website. It should be clearly demonstrated that the sequential test has been undertaken and that there are no other feasible sites outside of Flood Zones 2 and 3 before any sites are allocated here.

From our review of the updated local plan, some of the allocated sites listed in the local plan fall within Flood Zones 2 and 3, as well as the design flood event (1% Annual Exceedance Probability plus an appropriate allowance for climate change). The aforementioned Level 1 SFRA states: "If following application of the sequential test, it is found that a number of sites need to be located in Flood Zone 2, Flood Zone 3a and/or Flood Zone 3b a level 2 SFRA will likely be required." (page 29). There is no evidence that a Level 2 SFRA has been prepared as part of the Local Plan update, nor is this document present in the evidence base.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

For the opportunity to further explain our reason why we require the evidence which supports policy EN18 to be up to date. In summary it is to ensure that people and property are safe from the impacts of flood risk in in Reading.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Mrs	
First Name	Sarah	
Last Name	Warriss-Simmons	
Job Title (where relevant)	Planning Advisor	
Organisation (where relevant)	Environment Agency	
Address Line 1	Red Kite House	
Line 2	Howbery Park	
Line 3	Benson Lane	
Line 4	Crowmarsh	
Post Code	OX10 8BD	

Telephone
Number

E-mail Address
(where relevant)

planning_THM@environment-
agency.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph	<div style="border: 1px solid black; width: 100px; height: 80px;"></div>	Policy	H13 Provision for Gypsies and Travellers	Policies Map	<div style="border: 1px solid black; width: 170px; height: 80px;"></div>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div style="border: 1px solid black; width: 80px; height: 20px; text-align: center;">Yes</div>	No	<div style="border: 1px solid black; width: 80px; height: 20px;"></div>
4.(2) Sound	Yes	<div style="border: 1px solid black; width: 80px; height: 20px;"></div>	No	<div style="border: 1px solid black; width: 80px; height: 20px; text-align: center;">No</div>
4 (3) Complies with the Duty to co-operate	Yes	<div style="border: 1px solid black; width: 80px; height: 20px; text-align: center;">Yes</div>	No	<div style="border: 1px solid black; width: 80px; height: 20px;"></div>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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 NPPF 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 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. We have provided you with the proposed amendment to the policy in box 6 below.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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.*'

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐ Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

For the opportunity to further explain our reason why we require this policy to apply the changes we have suggested. In summary it is to ensure the safety of people (residents and emergency services) in the event of a flood.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Mrs	
First Name	Sarah	
Last Name	Warriss-Simmons	
Job Title (where relevant)	Planning Advisor	
Organisation (where relevant)	Environment Agency	
Address Line 1	Red Kite House	
Line 2	Howbery Park	
Line 3	Benson Lane	
Line 4	Crowmarsh	
Post Code	OX10 8BD	

Telephone
Number

E-mail Address
(where relevant)

planning_THM@environment-
agency.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph

Policy

**Central
Reading
Allocation
Policies**

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

Yes

No

4.(2) Sound

Yes

No

No

4 (3) Complies with the
Duty to co-operate

Yes

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We do not consider **all sites** within the Central Reading allocations in the local plan to be deliverable and developable. This is because;

- 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).

In addition to the general points above, we have the following specific comments about specific site allocations. In summary we do not consider these sites to be deliverable due to a number of constraints and therefore the allocations and site polices 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.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See final column of table (site requirements to ensure deliverability).

Site	Allocated dwellings	Site constraints	Site requirements to ensure deliverability
CR11: STATION/RIVER MAJOR OPPORTUNITY AREA			
CR11e (North of Station)	190-790 dwellings, 50,000-80,000 offices, retail and leisure, hotel	FZ2 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.	Sequential test is required. 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. 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.
CR11f (West of Caversham Road)	94-140 dwellings	FZ2 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.	Sequential test is required. 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. 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.

CR11g (Riverside)	250- 380 dwellings, leisure and offices	<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.</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>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 overshadowing and if sheet piling can be removed, it is.</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 river. Development should continue the high quality direct route including a green link from the north of the station to the Christchurch Bridge, with an area of open 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>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>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>
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CR11i (Napier Court)	250- 370 dwellings	<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.</p> <p>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>
CR12: WEST SIDE MAJOR OPPORTUNITY AREA			
CR12a (Cattle Market)	560- 840 dwellings, healthcare	<p>FZ2, including 1% AEP + 35% CC predominantly 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, healthcare). 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>
CR12b (Great Knollys St and Weldale St)	260- 380 dwellings	<p>Site is in 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.</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</p>

			directed/added to the treatment network and demonstrate sufficient capacity for new development.
CR13: EAST SIDE MAJOR OPPORTUNITY AREA			
CR13d (Gas Holder)	46-130 dwellings	<p>Site is within FZ2 and the 1% AEP + 35% CC extent.</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>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>
CR14: OTHER SITES FOR DEVELOPMENT IN CENTRAL READING			
CR14g (The Oracle Riverside East)	250-370 dwellings	<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>
CR14m (Caversham Lock Island and Caversham Weir, Thames Side)	900-1,100 sq m of leisure use	<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>

CR14n (Reading Central Library)	22- 32 dwellings	<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 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>
CR14s (20-22 Duke Street)	12-18 dwellings	<p>Site is partly within FZ3b.</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>There is no mention of flood risk in this Local Plan policy. 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>
CR14v (Norman Place)	130- 190 dwellings	<p>Site is within FZ3a</p> <p>River Thames adjacent.</p> <p>Atlantic Salmon and European Eel migratory route.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the 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>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</p>

		<p>STW require upgrades to accommodate further growth in Reading.</p>	<p>overshading and if sheet piling can be removed, it is.</p> <p>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>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>
CR14w (Reading Bridge House, Norman Street)	150- 230 dwellings	<p>Site is within FZ3b where the River Thames runs adjacent.</p> <p>Atlantic Salmon and European Eel migratory route.</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 required and exception test must be passed before the site can be allocated.</p> <p>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.</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>
CR14x (Part of Tesco Car Park, Napier Rd)	57-85 dwellings	<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</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</p>

		accommodate further growth in Reading.	<p>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>
CR14y (Kennet Place, Kings Rd)	84-126 dwellings	<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>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>
CR14z (Sapphire Plaza, Watlington Street)	50-74 dwellings	<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>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>
CR14aa (Part of Reading College, Kings Road)	31-47 dwellings	<p>Superficial Secondary A aquifer and Bedrock Principal aquifer.</p> <p>Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW). Currently the Reading STW require upgrades to</p>	<p>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. The policy current does not mention addressing contamination.</p> <p>A Water cycle study must be produced to take account of</p>

		accommodate further growth in Reading.	discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.
--	--	--	--

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

For the opportunity to further explain our reason why the allocated sites need to include the listed requirement to make them developable/deliverable to support growth in Reading.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Model Representation Form for Local Plans

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Name of the Local Plan to which this representation relates:

Reading Borough Council
Local Plan Pre-Submission
Draft Partial Update
Regulation 19

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This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Mrs	
First Name	Sarah	
Last Name	Warriss-Simmons	
Job Title (where relevant)	Planning Advisor	
Organisation (where relevant)	Environment Agency	
Address Line 1	Red Kite House	
Line 2	Howbery Park	
Line 3	Benson Lane	
Line 4	Crowmarsh	
Post Code	OX10 8BD	

Telephone
Number

E-mail Address
(where relevant)

planning_THM@environment-
agency.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	South Reading Allocation Policies	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We do not consider **all sites** within the South Reading allocations in the local plan to be deliverable and developable. This is because;

- 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).

In addition to the general points above, we have the following specific comments about specific site allocations. 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.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See final column of table (site requirements to ensure deliverability).

Site	Allocated dwellings	Site constraints	Site requirements to ensure deliverability
SR1: ISLAND ROAD MAJOR OPPORTUNITY AREA			
SR1a (Former landfill, Island Rd)	93,000 – 133,000 sq m of industrial/warehouse/R&D use	<p>Site is within FZ3b and FZ2 extents are significant across the site.</p> <p>Main river adjacent.</p> <p>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>
SR1c (Island Rd, A33 frontage)	25,000 - 38,000 sq m of industrial/warehouse/R&D uses, or alternative commercial uses.	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.	<p>Sequential test is required.</p> <p>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</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>FZ2/3, a Level 2 SFRA 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>
SR4: OTHER SITES FOR DEVELOPMENT IN SOUTH READING			
SR4a (Pulleyn Park, Rose Kiln Lane)	80-120 dwellings	<p>The site is within FZ3b where main rivers (Holy brook and River Kennet) run adjacent and 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>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>
SR4g (Reading Link Retail Park, Rose Kiln Lane)	150-220 dwellings	<p>Holy Brook 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</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>A Water cycle study must be produced to take account of</p>

		further growth in Reading.	discharges from new development being directed/added to the treatment network and demonstrate sufficient capacity for new development.
SR4k (Former sales and marketing suite, Drake Way)	12-23 dwellings	<p>Main River Foudry Brook adjacent to site.</p> <p>European Eel migratory route, site boundary includes southern end of large pond.</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>
(Continue on a separate sheet /expand box if necessary)			

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

For the opportunity to further explain our reason why the allocated sites need to include the listed requirement to make them developable/deliverable to support growth in Reading.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Model Representation Form for Local Plans

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Reading Borough Council
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Draft Partial Update
Regulation 19

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Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Sarah"/>	<input type="text"/>
Last Name	<input type="text" value="Warriss-Simmons"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Planning Advisor"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Environment Agency"/>	<input type="text"/>
Address Line 1	<input type="text" value="Red Kite House"/>	<input type="text"/>
Line 2	<input type="text" value="Howbery Park"/>	<input type="text"/>
Line 3	<input type="text" value="Benson Lane"/>	<input type="text"/>
Line 4	<input type="text" value="Crowmarsh"/>	<input type="text"/>
Post Code	<input type="text" value="OX10 8BD"/>	<input type="text"/>

Telephone
Number

E-mail Address
(where relevant)

planning_THM@environment-
agency.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph

Policy

**West
Reading
and
Tilehurst
Allocations
Policies**

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

Yes

No

4.(2) Sound

Yes

No

No

4 (3) Complies with the
Duty to co-operate

Yes

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We do not consider **all sites** within the West Reading allocations in the local plan to be deliverable and developable. This is because;

- 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).

In addition to the general points above, we have the following specific comments about specific site allocations. In summary we do not consider these sites to be deliverable due to a number of constraints and therefore the allocations and site polices 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.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See final column of table (site requirements to ensure deliverability).

Site	Allocated dwellings	Site constraints	Site requirements to ensure deliverability
WR3: OTHER SITES FOR DEVELOPMENT IN WEST READING AND TILEHURST			
WR3b (2 Ross Road and part of Meadow Road)	41-61 dwellings	<p>Site is within FZ2 and the 1% AEP + 35% CC extent, including all obvious access and escape routes.</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 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>
WR3i (Land at Portman Way)	18-26 dwellings	<p>This site lies entirely within FZ2 and the 1% AEP + 35% CC extents.</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 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</p>

			development being directed/added to the treatment network and demonstrate sufficient capacity for new development.
WR3k (784-794 Oxford Road)	18-26 dwellings	<p>FZ2</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>FRSA applies, Level 2 SFRA required.</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>
WR3v (Former Southcote Library, Coronation square)	12-23 dwellings	<p>Secondary bedrock aquifer A.</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>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>
WR3y (72 Berkley Avenue)	9-13 dwellings	<p>Secondary superficial aquifer A, secondary bedrock aquifer A.</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>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</p>

			treatment network and demonstrate sufficient capacity for new development.
(Continue on a separate sheet /expand box if necessary)			

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

For the opportunity to further explain our reason why the allocated sites need to include the listed requirement to make them developable/deliverable to support growth in Reading.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Model Representation Form for Local Plans

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Local Plan Pre-Submission
Draft Partial Update
Regulation 19

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Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Sarah"/>	<input type="text"/>
Last Name	<input type="text" value="Warriss-Simmons"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Planning Advisor"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Environment Agency"/>	<input type="text"/>
Address Line 1	<input type="text" value="Red Kite House"/>	<input type="text"/>
Line 2	<input type="text" value="Howbery Park"/>	<input type="text"/>
Line 3	<input type="text" value="Benson Lane"/>	<input type="text"/>
Line 4	<input type="text" value="Crowmarsh"/>	<input type="text"/>
Post Code	<input type="text" value="OX10 8BD"/>	<input type="text"/>

Telephone
Number

E-mail Address
(where relevant)

planning_THM@environment-
agency.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph

Policy

**Caversham
and
Emmer
Green
Allocations
Policies**

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

Yes

No

4.(2) Sound

Yes

No

No

4 (3) Complies with the
Duty to co-operate

Yes

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We do not consider **all sites** within the Caversham and Emmer Green allocations in the local plan to be deliverable and developable. This is because;

- 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).

In addition to the general points above, we have the following specific comments about specific site allocations. 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.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See final column of table (site requirements to ensure deliverability).

Site	Allocated dwellings	Site constraints	Site requirements to ensure deliverability
CA1: SITES FOR DEVELOPMENT IN CAVERSHAM AND EMMER GREEN			
CA1a (Reading University Boat Club)	18-28 dwellings	<p>This site is within FZ3b and entirely within the 1% AEP + 35% CC extent.</p> <p>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>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>

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

For the opportunity to further explain our reason why the allocated sites need to include the listed requirement to make them developable/deliverable to support growth in Reading.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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Part A

1. Personal Details*

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2. Agent's Details (if applicable)

Title	Mrs	
First Name	Sarah	
Last Name	Warriss-Simmons	
Job Title (where relevant)	Planning Advisor	
Organisation (where relevant)	Environment Agency	
Address Line 1	Red Kite House	
Line 2	Howbery Park	
Line 3	Benson Lane	
Line 4	Crowmarsh	
Post Code	OX10 8BD	

Telephone
Number

E-mail Address
(where relevant)

planning_THM@environment-
agency.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph

Policy

**East
Reading
Allocations
Policies**

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

Yes

No

4.(2) Sound

Yes

No

No

4 (3) Complies with the
Duty to co-operate

Yes

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We do not consider **all sites** within the East Reading allocations in the local plan to be deliverable and developable. This is because;

- 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).

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.

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.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A sequential test is required to support the selection and allocation of sites within flood zones 2 and 3.

A water cycle study is required to provide evidence that there is suitable capacity for foul water treatment of Reading STW.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

For the opportunity to further explain our reason why the allocated sites need to include the listed requirement to make them developable/deliverable to support growth in Reading.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.