

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

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Pang Valley Rambler Group of the Ramblers' Association

(Response from webform)

Title: Mr

First name: Henry

Last name: Hatcher

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 TR4

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.

Whilst the promotion of cycling is laudable, we have concerns relating to the safety of pedestrians, particularly in relation to the Thames Path where the status appears to be confused. It's formal classification is a "Footpath" yet it is used extensively by cyclists. We have commented on this at length in the past especially in regard to the Council's former proposal to convert it to a joint use path. If the current situation is to continue we request that Notices similar to those displayed by Remenham Parish Council are erected at intervals along the Thames Path within RBC area. A photograph of such a notice is attached.

Please upload any supporting information (if necessary).

https://reading.govocal.com/uploads/f737bddd-6c0f-4be6-a1e3-c28dfb45dbf4/idea_file/file/d3475fc2-30c8-4a8b-b3b6-d867d0083952/IMG_20241108_114439675_BURST000_COVER.jpg

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: Henry Hatcher



Reading Friends of the Earth

Reading Borough Local Plan – Reading Friends of the Earth response on Local Plan Pre-Submission Draft Partial Update, November 2024 (Regulation 19)

Introduction:

Reading Friends of the Earth is a local voluntary group of environmental campaigners. We are licenced to use the name 'Reading Friends of the Earth' by the national 'Friends of the Earth' organisation but we are independent and do not represent them.

Contact details etc.: website – www.readingfoe.co.uk; e-mail – info@readingfoe.co.uk; 'phone - ; surface mail – C/o Mr. J Booth,

Reading's Local Plan Partial Update Pre-Submission Draft, November 2024, is a significant improvement on the previous Plan but there are a number of areas where we believe it is not 'sound' and should be improved to make it more justified, effective and consistent with national policy.

We will be pleased to submit more detailed comments and to participate in hearing sessions if the Inspector sees fit.

Context and general comments:

1/. The Plan addresses 15 years but new development must be suitable for a much longer period. Not only addressing short-term needs and current standards but allowing for likely future changes to sustainability constraints and opportunities to cope with harsher environmental impacts - to local conditions, supply chains, demographic change and including a growth in numbers of 'climate migrants'.

2/. Retro-fit of insulation, heating/cooling systems, waste disposal, flood management, energy supply, transport infrastructure, green spaces etc. etc. will be expensive and inconvenient – and sometimes unachievable. So developers must be set extremely high standards and be required to design in opportunities for future improvement such as heat networks, grey water recycling etc., if they are not to be fitted initially.

3/. The options for off-site compensation – such as biodiversity net gain, energy generation, and payment to the local authority - must be designed, specified and enforced rigorously.

4/. NPPF (2023 version) section 8 c) specifies “**an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

5/. The UK government is committed to achieving 'Net Zero' by 2050 and has committed to an 68% reduction in emissions by 2030, as part of its Nationally Determined Contribution towards the Paris Agreement. At present its strategy is under revision after legal challenges from Friends of the Earth and others.

<https://researchbriefings.files.parliament.uk/documents/CBP-9888/CBP-9888.pdf> and

<https://friendsoftheearth.uk/latest/landmark-high-court-judgment-finds-governments-climate-plan-unlawful-again> .

Comments on Specific Policies:

CC2: SUSTAINABLE DESIGN AND CONSTRUCTION

It is good to see that BREEAM has been replaced by policies with more emphasis on carbon emissions during both construction and use. We strongly support the ideals expressed in the first two paragraphs.

Renewable Energy:

We expect many developments – particularly in multi-storey buildings and dense developments favoured to optimise land-use and transport hubs – will be unable to generate enough solar electricity on-site to meet the 'net zero' policy aim. So the policy should be revised with more detail of how this aim – to fund development of renewable electricity supply - can be achieved in practice.

Because use of electricity for heating and lighting is likely to be greatest during months when generation of solar energy is expected to be low, and significantly at night-time when generation is zero, the requirement to generate the same amount as the demand over the course of the year should be qualified. Energy storage is inherently inefficient – less comes out than goes in; long-term (seasonal) storage will be costly; at times of peak demand

expensive sources will be used such as gas backup with or without carbon capture and storage or use of biogas. So simply comparing solar electricity generated with annual electricity demand is a useful benchmark but not sufficient.

Additionally developers must ensure that the mains supply to the development will be more than capable of meeting the peak demand, or give undertakings to restrict the peak demand.

The requirement to address energy demand for heating in terms of kWh/m²/year could be refined in the interest of optimising insulation and therefore minimising emissions. Heat loss occurs through floors, ceilings and walls so will be less in e.g. a multi-storey block than in a single-storey structure with the same floor area. So the former may be tempted to reduce wall insulation while keeping within the limit when it could achieve better performance than the limit by better wall insulation, probably at little extra cost.

Embodied Carbon:

Requirement for embodied carbon assessment should be altered to require a 3000m² lower limit for an embodied carbon assessment and a lower limit for embodied carbon.

Drewniak et al published in October 2023 mapped embodied carbon in UK developments which were all less than 800 kg/m² so this does not serve as an aspirational target. Construction for most multistorey build typologies had found 400 kg/m² was achievable though a limit of 500kg/m² could be set as a reasonable target for a high level of compliance.

Drewniak quoted weighted averages of current relevant UK typologies were all less than 500 kg/m². As such it is recommended that the floorspace limit is reduced to 3000m² and the embodied carbon limit reduced to less than 500 kg/m². To encourage compliance with net-zero onsite installation the embodied carbon limit could consider exemption of contributions stemming from renewable energy infrastructure and selected high-efficiency measures such as the embodied carbon for materials to enable integration with a heat network.

<https://www.sciencedirect.com/science/article/pii/S0921344923001921>

Exceptional basis clause:

Criteria must be very strictly set and enforced. Alternative uses for the site must be investigated. Must not allow developments where future running demand for energy leading to carbon emissions will continue for decades.

Would like it explained how the financial contribution to the LPA will be calculated given future uncertainties on carbon pricing and electricity pricing.

BREEAM is not an appropriate measure because high scores can be obtained for relatively energy- and carbon-intensive developments. (See 4.1.3 in the document).

Ideally financial contributions as an alternative should be removed (or a 'last resort') as developers are said to exploit this type of mechanism to erect buildings that will continue to require high energy use – 'fabric first' must be the way forward. Connection to a heat network does not automatically provide compliance with a net-zero requirement and should still require total offset.

As such it is recommended that the exceptional basis clause is altered so all options are required rather than only one option of the three (without LPA finance as an option).

Use of potentially contaminating materials:

Use and waste of perfluorinated alkyl substances (PFAS) should be prohibited with zero tolerance since alternatives are available and can be required in all refurbishments and new builds. See CC5 for more discussion).

LETI:

We welcome the reference in 4.1.5 to the LETI Climate Emergency Retrofit Guide. We would like to see it promoted by the Council and other bodies for wider use in Reading.

CC3: ADAPTATION TO CLIMATE CHANGE

Some form of air conditioning or forced cooling may well be necessary or desirable to maintain comfort in future summers in many buildings. Even if not fitted initially retro-fit should be designed in and allowance made in calculations of future summer electricity demand.

Multi-stage heat-exchanger implementation with air handling in/out-take (MVHR) should be encouraged to mitigate heating/cooling requirements for fresh-air intake.

Since harsher storms are expected to become much more frequent within the design life for any new building then suitable tolerance to higher category storms should be considered with a minimum category 2 hurricane tolerance suggested and category 3 hurricane tolerance to be strongly considered.

As well as improving design of the drainage system we would like to see a policy to reduce hard standing - both by design in new developments and by people paving over gardens for car parking – which prevents rainfall being absorbed into the soil. This should reduce the flow into drains.

CC4: DECENTRALISED ENERGY

We support decentralised energy if it can be shown to be compatible with ‘zero-carbon’ aims – so not making unmitigated use of fossil fuels or bioenergy.

We are not aware of any recent studies showing how much of likely future demand can be met from local sources of renewable heat at reasonable financial and environmental cost. We are aware of a paper-study of potential of ground source heat from the aquifer below Reading that can be accessed by bore-holes and heat pumps which looks very promising and that RBC has commissioned studies of decentralised energy. It is important that any technologies adopted have been thoroughly investigated and shown to be long-term sustainable at the proposed scale.

CHP and Biomass:

We have concerns about proposed use of CHP – assuming it involves burning some hydrocarbon (not necessarily ‘fossil’) fuel – on grounds of CO2 emissions and air quality.

If hydrogen is proposed as a fuel we are concerned about the economics and environmental implications of ‘green hydrogen’ supply for this purpose.

Also the likelihood that unmitigated natural gas backup may be proposed in case of problems with the primary energy source. The chances of effective carbon capture and storage in Reading are remote.

The use of biomass is not sustainable and must be disqualified within the definition of renewable-based energy schemes. With the changes in land use expected through national tree cover policies and food security, developers are right to worry about future fuel supply if dependent upon biofuels. Providing adequate safe storage of fuel at scale on site to cover problems in supply isn’t realistic for Reading with limited (and expensive) land available. Developers would want to be sure that there will be a local supplier of biofuel pellets or similar.

The prospect of fuel supply interruption may be used as a reason for not providing CHP-driven community energy systems if significant local fuel storage is not made available.

CC5: WASTE MINIMISATION AND STORAGE

Maceration:

Where relevant for wastewater transport from sites, developments without onsite composting capability should be encouraged to utilise macerators implemented with suitable building wastewater system design.

PFAS:

Use and waste of perfluorinated alkyl substances (PFAS) should be prohibited with zero tolerance since alternatives are available and can be required in all refurbishments and new builds. This will be essential to avoid significant further environmental contamination of local waterways. PFAS are often used in surface sealers, paint, adhesives, tile, grout, concrete, carpets, textiles, and within refrigerants as well as various types of insulation however alternatives to all of these exist.

For wider context, the European Chemicals Agency is planning a ban on nearly all PFAS expected to be published in 2025 with restrictions effective as early as 2026.¹ This detail in the Reading Local Plan is important to ensure persistent organic pollutant (POP) waste/effluent is minimised which does not currently fall under POP UK-EU regulatory alignment.

Prohibition of PFAS for refurbishment and new build also falls under CC10 however has been considered here as PFAS waste to landfill is reasonably expected to contaminate groundwater as well as local exposure due to ageing and use of such articles.

Rather than requiring Health Impact Assessments (HIA) for any permitted use the complete ban of PFAS is recommended which is much more feasible to implement than defining a new means to consider PFAS within HIA.

Perhaps the local plan needs to identify the need for storage or processing areas/ recovery and recycling areas to deal with the flow of new materials needed within these new systems. This would include biofuels but also reprocessing of batteries and solar panels etc. to recover valuable materials.

Waste from Sustainable Technologies:

Over time there is going to be a significant increase in waste solar panels, batteries, heat exchangers etc., all of which will contain rare (and valuable) metals and be of different generations so require skill to identify and disassemble. The present facility at Smallmead (re3) is unlikely to be suitable as it stands.

The current re3 contract should be reviewed in view of future needs and new facilities should be provided to support moves to a sustainable 'circular economy'.

CC7: DESIGN AND THE PUBLIC REALM

'Built Form': should include reference to accessibility by bicycles including bicycles with trailers to transport children or goods.

'Nature': should include a requirement that new plantings and/or new natural features are actively managed – by developer or new owners/tenants and checked after perhaps 5 years and replaced if necessary. Many planted trees seem not to survive.

CC8: SAFEGUARDING AMENITY

New developments must not result in increased air pollution beyond current WHO thresholds. This should be added to the list – many pollutants cannot be smelled and are not in the form of visible dust and fumes.

Developers should address expected performance against specific sections of this policy in the planning application. See also EN15.

EN7: LOCAL GREEN SPACE AND PUBLIC OPEN SPACE:

Fobney Meadow / Fobney Marsh

We support calls for the Fobney Meadow / Fobney Marsh area to be designated as a Local Green Space. This area is often flooded and as a result becomes a hot spot within Berkshire for bird life especially during the autumn and winter months. It is a green lung with proximity to other wildlife habitats including Fobney Island Nature Reserve EN7Sb (to the south) which it complements.

Because it floods and is a useful holding area for flood water it is not suitable for development but LGS status would give it enhanced status. Ideally it should be adopted by the Council and a management plan put in place.

Reading Old Cemetery

We support calls for Reading Old Cemetery to be designated as a Public Open Space.

The land lies adjacent to one of the most densely populated areas of Reading, Newtown, and between two roads that are designated as part of an Air Quality Management Action area. It offers a welcome respite to the urban environment and is supported by friends of Reading Old Cemetery who manage part of it as chalk grassland habitat.

¹ https://echa.europa.eu/documents/10162/2082415/2023-02-07_pfas+media+briefing_en.pdf/1661579d-353a-2fb0-1062-38fc3eb4bd78?t=1675849038730

EN12: BIODIVERSITY

b) Biodiversity net Gain

Biodiversity is threatened everywhere and we are concerned that cumulative effects of a number of developments may be underestimated.

Biodiversity net gain and its measurement is a relatively new and uncertain area – ecosystems are very complicated - so we would like to see a target of 20% rather than 10% in the hope that it will be effective as a strategy to at least achieve some net gain.

Off-site improvements to the 'Green Network' should be very useful.

EN15: AIR QUALITY

Reading's Air Quality is very much worse than the WHO targets for NO₂, PM₁₀ and PM_{2.5} - and UK government targets are not keeping up with the WHO. PM_{2.5} is thought to have the most serious impacts on human health – see latest AQ Action Plan.

The Reading Plan refers to Reading's Air Quality Action Plan 2015 but this has now been replaced by '2024 – 2029 Air quality action plan' <https://www.reading.gov.uk/climate-and-pollution/air-quality-action-plan/> but this is likely to be replaced before the end of the Local Plan term.

While much of the PM_{2.5} will be of external origin local emissions from vehicles (braking, clutches and tyres as well as exhaust pipes) will both increase local concentrations and add to the national burden. So reduction in use of vehicles in the Borough should be required.

The proposed criteria to require an AQA is not sound because in the context of both air quality and congestion 100 extra car parking spaces per development may well prove excessive ... especially if many of them were to be used by peak hour traffic ... because congestion has a non-linear response to traffic density, and air quality probably has a non-linear response to congestion and traffic density. All development within the AQMA should be subject to an Air Quality Assessment if parking for motor vehicles is to be provided.

H5: STANDARDS FOR NEW HOUSING

c). Energy use and supply.

We would like to see the average space heating demand requirement reduced – in accordance with 'fabric first' principle. PassivHaus standard is 15 kWh/m² so this should be the standard.

There is a widely recognised "performance gap" between design and delivery of buildings. The PassivHaus design and testing approach has been shown to reliably deliver measured in use outcomes that match those predicted by the design. Developers should either use the Passivhaus methodology or explain how the method that they propose to use will reliably deliver in use energy demands that their design predicts.

In addition as mentioned in our discussion of CC2:

We expect many developments – particularly in multi-storey buildings and dense developments favoured to optimise land-use and transport hubs – will be unable to generate enough solar electricity on-site to meet the 'net zero' policy aim. So the policy should be revised with more detail of how this aim – to fund development of renewable electricity supply - can be achieved in practice.

Because use of electricity for heating and lighting is likely to be greatest during months when generation of solar energy is expected to be low, and significantly at night-time when generation is zero, the requirement to generate the same amount as the demand over the course of the year should be qualified. Energy storage is inherently inefficient – less comes out than goes in; long-term (seasonal) storage will be costly; at times of peak demand expensive sources will be used such as gas backup with or without carbon capture and storage, or use of biogas. So simply comparing solar electricity generated with annual electricity demand is not sufficient to address the requirements of the development.

Additionally developers must ensure that the mains supply to the development will be more than capable of meeting the peak demand, or give undertakings to restrict the peak demand.

The requirement to address energy demand for heating in terms of kWh/m²/year could be refined in the interest of optimising insulation and therefore minimising emissions. Heat loss occurs through floors, ceilings and walls so will be less in e.g. a multi-storey block than in a single-storey structure with the same floor area. So the latter may be tempted to reduce wall insulation while keeping within the limit when it could do better. But better wall insulation should reduce energy use and emissions probably at little extra cost.

We would like to see incentives to reduce electricity consumption by the use of ground- or air-sourced heat pumps and mechanical ventilation with heat recovery. As well as reducing running costs these techniques will help to reduce demand on the local and national electricity supply to reduce the risks of blackouts on cold, still winter evenings.

Exceptional basis clause:

Must not allow developments where future running demand for energy dependent on carbon emissions will continue for decades, or where demand for electricity will be exceptionally high.

The 'either/or' approach seems to supply a lot of options – if developments require 'exceptional basis' consideration they should all be required to produce an energy statement.

As above, it is important that infrastructure is in place to meet peak demand when renewable generation is low. How the financial contribution to the LPA will be calculated given future uncertainties on carbon pricing and electricity pricing should be explained in more detail. Energy demand will continue for the life of the building and £15k per dwelling may be too low.

4.4.46 the Climate Emergency Strategy has been revised.

TR1: ACHIEVING THE TRANSPORT STRATEGY:

TR1 and the Transport Strategy itself offer many great aspirations but in some respects is unclear on what it will actually expect to 'achieve':

- Section 9.3 of the Reading Transport Strategy 2040 says the CO₂ performance indicator (point 11) is to halve emissions to 54 kt CO₂e in 2040. We do not think this is compatible with Reading's net zero aspirations.
- Also that document gives no performance indicators for either time lost to congestion, vehicle-km driven on the roads or modal shift.

We would like to change the word 'should' to 'must' in the first line of this policy and the last line of 4.5.3.

4.5.2 The predicted growth in trips presents a major challenge unless modal shift to active travel and/or public transport can be achieved.

TR2: MAJOR TRANSPORT PROJECTS

East Reading Bus Rapid Transit:

We are disappointed that East Reading Bus Rapid Transit seems to still be promoted. A scheme on this route was rejected by Wokingham Borough Council because of impact on the Thames-side environment (used by people of East Reading) in that Borough, including bridge over River Kennet. It was not predicted to have significant impact on air quality or congestion. It would reduce local green space. This scheme should be abandoned and no further funding directed towards it.

While bus rapid transit from Wokingham Borough is valuable the new bus lane on London Road (already implemented) provides that option.

Cross Thames Travel:

Measures to be assessed should prioritise road user charging and de-prioritise an additional road bridge which would have very high environmental and financial cost and encourage more and longer road-trips.

We are very keen to supply additional supporting evidence to the Council on the advantages of road user charging and the disadvantages of providing additional roadspace.

END - Final Version 18th December 2024

Reading Heights Ltd and MYCO Ltd

Model Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	Ref: (For official use only)
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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

Please return to Reading Borough Council by 18th December 2024 at 5:00 p.m.

Personal data is collected according to the Council's Data Protection Policy. The Council will hold the personal information provided for the purpose of planning policy consultations and may be published at the end of the consultation.

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	Mr	Mr
First Name	Conal	Andrew
Last Name	Long	Somerville
Job Title (where relevant)		Associate Director
Organisation (where relevant)	Urban High	Nexus Planning
Address Line 1		Apex Plaza
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Line 3		
Line 4		
Post Code		RG1 1AX

Telephone
Number

07584 471 897

E-mail Address
(where relevant)

a.somerville@nexusplanning.co.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 **Policy H1** 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"/>	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.

Please see enclosed sheet

(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.

Please see enclosed sheet

(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)

☐ Y

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:

To further explain to the Inspector why the policy is unsound

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.

Background

1. These representations, on behalf of Reading Heights Ltd and MYCO Ltd, are made to the 'Local Plan Partial Update – Pre-Submission Draft (Regulation 19) Consultation' ("**the draft Local Plan**") being carried out by Reading Borough Council ("**the Council**") as local planning authority.
2. Reading Heights and MYCO's interest in the draft Local Plan is as respective freehold owner and prospective developer of land on the corner of Queens Road / Watlington Street, Reading (adjacent to the Inner Distribution Road) ("**the Site**") that has significant potential for a residential led scheme.

Policy H15 – Provision of Housing

3. Draft Local Plan Policy H1 proposes a housing requirement of 825 dwellings per annum (dpa), below the Council's Local Housing Need of 878 dpa, calculated via the Standard Method under the National Planning Policy Framework, 2023 ("**the 2023 Framework**"), as would apply due to the draft Local Plan being progressed under the transitional provisions of the National Planning Policy Framework, 2024 ("**the 2024 Framework**").
4. Rather than the Council's starting point for calculating Local Housing Need being the Standard Method, as the 2023 Framework considers it 'should be', it seeks to rely on an alternative, local assessment, purporting a lower need of 735 dpa.
5. For such an alternative approach to be justified, the 2023 Framework requires there to be 'exceptional circumstances', relating to the particular 'demographic characteristics' of an area. That policy test is incredibly high – indeed it is the highest bar of justification set by the 2023 Framework, the same (to provide context) as that to alter Green Belt boundaries where such boundaries are intended to be permanent.
6. Against this test, the Council presents a 'Housing Provision Background Paper' (November 2024) with two arguments as to why it considers 'exceptional circumstances' exist: that the 2014 household projections are unreliable and an underestimation housing need for Reading; and that the urban uplift should not be applied given Reading's population size and geographic extent.
7. The Council's alternative approach is to start with the 2018 based household projections, with adjustments to reflect the local circumstances, but excluding the

urban uplift, to arrive at a housing need figure of 735 dpa. This is significantly below the 2023 Framework Standard Method figure of 878 dpa. In response, significant issues of soundness are identified:

- the Government has previously considered but ruled out the use of 2018 household projections to inform the Standard Method, with fundamental issues identified:
 - that it would fail to result in anywhere near the 300,000 net additional homes target across England (notwithstanding that it may increase housing need in Reading); and
 - that it would be limited in its ability to address affordability challenges, reinforcing a feedback loop of undersupply in some of the least affordable and undersupplied housing markets in the country; and
 - that the Council cannot choose to disapply the urban uplift – it is an inherent part of the Standard Method calculation. The urban uplift was introduced in 2021 with clear and strong justification¹ to deliver more homes on brownfield land and in areas considered to be most sustainable in terms of existing transport and social infrastructure (such as Reading); to drive structural changes to urban environments, requiring creative and most effective use of brownfield land; and to underpin a sustainable pattern of development that reduces the need for unnecessary high carbon travel.
8. Whilst the ‘Housing Provision Background Paper’ (November 2024) seeks to present Reading as an outlier, a statistical anomaly when compared to other major urban areas across the country, as a reason to disapply the urban uplift, that loses sight of the purpose of the urban uplift as an important policy tool to drive the most sustainable forms of development nationwide.
9. Accordingly, and where the Government recognise that the urban uplift is designed to be challenging (requiring structural and creative solutions), the Council should seek to meet its Local Housing Need, to deliver at least 878 dpa.

¹ Government response to the local housing need proposals in “Changes to the current planning system” (April 2021)

10. This calculation of need should be separate to how Reading's constrained supply might influence any requirement. The position of housing need is important, as if it cannot be accommodated within Reading itself, neighbouring authorities should be required to positively to work through the Duty to Cooperate to provide for that unmet need. Artificially reducing housing need (which might include any unmet need) would materially affect the ability of the Government's planning policies to provide for sufficient housing in accordance with paragraph 1 of the 2023 Framework.
11. The Council's reporting that neighbouring authorities consider there is no scope to meet any unmet housing needs from Reading is not considered a robust or justified approach to lowering the starting point of Reading's housing need should be.
12. Accordingly, the Council's alternative approach to calculating housing need, and accordingly Local Plan Policy H1, cannot be considered an appropriate strategy on which to progress the draft Local Plan, failing the tests of soundness.
13. By way of further context, no example of where another local planning authority has had accepted at Examination an alternative approach to calculating is housing need, meeting the bar of 'exceptional circumstances', is identifying. Indeed, most recently Oxford City Council's attempts to increase its housing need (above Local Housing Need) was rejected (despite the aim of the Framework to boost the supply of houses), emphasising the extremely high evidential test.
14. Accordingly, the draft Local Plan should be reconsidered and revised, based on a Local Housing Need starting point and spatial strategy to deliver as much of that housing as possible.

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

Policy H15

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

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.

Please see enclosed sheet

(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.

Please see enclosed sheet

(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)

☐ Y

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:

To further explain to the Inspector the reasoning of why the policy and its justification is unsound

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.

Background

1. These representations, on behalf of Reading Heights Ltd and MYCO Ltd, are made to the ‘Local Plan Partial Update – Pre-Submission Draft (Regulation 19) Consultation’ (“**the draft Local Plan**”) being carried out by Reading Borough Council (“**the Council**”) as local planning authority.
2. Reading Heights and MYCO’s interest in the draft Local Plan is as respective freehold owner and prospective developer of land on the corner of Queens Road / Watlington Street, Reading (adjacent to the Inner Distribution Road) (“**the Site**”) that has significant potential for a residential led scheme.
3. The Site is known to the Council with planning permission (reference 18/0909) granted in February 2019 for a nine storey residential building and rooftop extension to Clarendon House following the conversion of that existing building to apartments. Whilst that planning permission has been implemented via construction of the rooftop extension (as a defined phase of development), the larger, new building construction (as phase 2) has not progressed due to significant issues of viability / deliverability.
4. As an alternative to phase 2 of the extant planning permission, Reading Heights and MYCO intend to progress a co-living scheme on the Site

Policy H15 – Purpose-Built Shared Living Accommodation

Context

5. Reading Heights and MYCO are supportive in principle of a specific co-living policy, but consider revisions are necessary for it to be positively prepared (in respect of making effective use of land, to meet the need for homes) and consistent with the National Planning Policy Framework, 2023 (“**the 2023 Framework**”), as would apply with the draft Local Plan being progressed under the transitional provisions of the National Planning Policy Framework, 2024 (“**the 2024 Framework**”).
6. The 2023 Framework requires that the needs of groups with specific housing requirements are addressed (paragraph 60); and when establishing housing need different groups in the community should be considered (paragraph 63). Such groups include younger people, people who wish to rent their homes, people who may live in a

location for only work related reasons, and people who seek more affordable accommodation.

7. The need of these particular groups is already understood by the Council, as reflected by Policy H8 (Residential Conversations) of the draft Local Plan – that the conversion of buildings (primarily large dwellinghouses) to houses of multiple occupation have an important role to play in Reading, providing:

“valuable supply of reasonably low cost private rented accommodation, meeting a need in the market” and recognising that “generally, conversions provide for a market need for small, flexibly let accommodation reflecting household formation trends in the population and the more transient nature of parts of the labour market.”¹

8. For co-living, the draft Local Plan defines this as being “A form of communal residential accommodation in which individuals live under a single management regime and which offers more communal facilities and amenities and is usually on a larger scale than a House in Multiple Occupation (HMO)”². Co-living too should make a significant or valuable contribution to meeting the housing need of Reading’s communities.
9. This contribution is reinforced by the Planning Practice Guidance (“**the PPG**”)³, stating that additional communal accommodation should count towards the Housing Delivery Test:

“Communal accommodation will be accounted for in the Housing Delivery Test by applying adjustments in the form of two nationally set ratios. These are based on England Census data. The ratios for both net student and net other communal accommodation are found in the Housing Delivery Test measurement rule book.”

10. The Housing Delivery Test measurement rule book (July 2018)⁴ confirms that for ‘communal accommodation’, not student accommodation, the ratio to be applied is

¹ Draft Local Plan paragraph 4.4.59

² Glossary of the Local Plan Partial Update Consultation

³ Paragraph 041 Reference ID: 68-041-20190722: *How does the HDT account for delivering communal housing?*

⁴ Housing Delivery Test measurement rule book, paragraph 11

based in the average number of adults in all households, with a ratio of 1.8. I.e. every 18 co-living bedroom spaces equates to 10 dwellings.

11. In term of raising the quality of accommodation, co-living is also important. Unlike the disbenefits that the draft Local Plan identifies with existing HMO accommodation – the subdivision of larger, older buildings, the loss of family housing, disruption of the character of existing neighbourhoods, and provision of poor amenities for residents (internal conditions, open space, bin and cycle storage) – purpose built and professionally managed co-living development in appropriate locations would avoid such impacts.
12. Co-living in suitable central locations would also significantly reduce the pressure on the existing stock of larger family houses in more suburban parts of the borough. Such larger homes are better suited for family accommodation, with the draft Local Plan presenting that securing family accommodation in the town centre environment is extremely challenging.
13. In respect of demographic and other influences on the type of housing required, there is a significant demand in the town centre for co-living tenures, which has a different attraction and population profile from other parts of the Borough. The ‘Reading Local Housing Needs Assessment’ (July 2024) recognises that a third of household growth will be for single people⁵.
14. Beyond this demographic approach, demand for co-living tenures is driven by Reading’s resilient economy, attracting a labour workforce from across the country and internationally, as well as retaining students who have recently graduated from Reading University. The Council’s ‘Commercial Needs Assessment’ (November 2024) highlights larger lettings of office space within the town centre at One Station Hill to PepsiCo, PwC and NewFlex, totalling 115,000 sq ft⁶. Consistent with 2023 Framework paragraphs 85 and 86, available co living accommodation will help create the conditions in which these and other businesses can invest, expand and adapt, including to address barriers of a lack of suitable housing.

⁵ Paragraph 4.33, Reading Local Housing Needs Assessment (July 2024)

⁶ Paragraph 65, Commercial Needs Assessment (November 2024)

15. By way of further context to co-living accommodation, Reading Heights and MYCO present that:

- it is a purpose-built, flexible, rented, large-scale housing model, with residents having access to their own self-contained apartments (of varying sizes) and shared amenity space within the building in the form of living areas, workspaces, as well as perhaps gym facilities and cinemas;
- whilst co-living is a relatively new concept, demand and planning applications for bed spaces have surged since the Covid-19 pandemic in 2020. Residents find co-living an enticing / attractive offer due to the associated social and interactive lifestyle; and
- co-living includes longer term accommodation, promoting a more stable community, where residents would have an assured short term tenancy agreement, often with a minimum length of stay.

16. In Reading, there is a clear and growing demand / need for co-living, with people preferring this model as opposed to renting poor quality HMO space, often having to deal with unreliable landlords.

Proposed Policy

17. With regard to Policy H15 itself: the supporting text (paragraph 4.4.116) presents a minimum size threshold of 20 bedrooms for co-living development. Reading Heights and MYCO consider this threshold too low to viably achieve a sufficient range / standard of communal facilities and level of management necessary to ensure a high quality development. Instead, a minimum 40 bedroom size is more appropriate for development to successfully operate with the facilities and standards expected.

18. Reading Heights and MYCO support the minimum private (18sqm) and communal space standards (3sqm or 4sqm depending on number of residents) in the policy, as well as a minimum three-month tenancy period.

19. Likewise, there is support for the preferred spatial limitation, for co-living to be provided only in more accessible locations in Reading, where there is greatest access to employment, amenities and public transport.

20. However, Reading Heights and MYCO is fundamentally concerned that the preferred policy seeks to exclude co-living development on sites that are “*identified for general residential, as allocations or extant permissions*”. This approach is too blunt without provision to be able to consider matters that may be highly relevant as to whether or not a specific site is suitable for co-living development. For instance, on a site that may have been promoted for Class C3 housing, there could be a range of reasons why such development has not been delivered, even if extant (say because a first phase has been delivered, such as the Site) – including financial viability; rapid changes to the urban context; and / or Reading’s dynamic socioeconomic and demographic influences.
21. It is also the case that many sites in central Reading have already been promoted for residential development, at very least through the Council’s call for sites exercise.
22. Where co-living development would contribute towards the Council’s housing supply as well as meeting a demonstrable need, the current preferred policy wording unnecessarily risks sterilising an otherwise suitable site. Consequentially, the policy wording would prohibit the ability to regenerate and make effective use of previously developed land, such as the Site contrary to paragraphs 123 – 126 of 2023 Framework.
23. Co-living accommodation is a form of housing and should not be considered instead of the more traditional model of dwellings, but as a complementary form of accommodation to meet the growing demand from people who would choose not to live in self-contained homes and are deterred from traditional HMOs because of their poor standards.
24. For the Policy H15 to meet the tests of soundness the criterion prohibiting co-living development from where there is a legacy of a site being promoted for Class C3 residential should therefore be deleted or at the very least amended to:

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 [that are extant and deliverable](#)), unless the purpose-built shared living accommodation element would be in addition to the planned residential;*

Ribbons, Carolyn

(Response from webform)

Title: Mrs

First name: Carolyn

Last name: Ribbons

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 (WR3s)/
Armour Hill (WR3t)

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.

As a local resident, I feel strongly that the designation of only part of the land at Kentwood Hill /Armour Hill as Local Green Space is unsound. I feel all of it should be included. If The Local 'so called ' charity are allowed to build on this land, we will lose the allotments and parking in Armour Hill , as recently illustrated when Dudley Close was closed, will be an absolute nightmare. The road is too narrow . In addition, the wildlife will be lost (the charity at present refuse access for a survey but as an allotment holder, I see and have evidence of much wildlife in this area. It would be lost forever.

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: Carolyn Ribbons

Ridgepoint Homes

(Response from webform)

Title: Miss

First name: Emma

Last name: Runesson

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

To which part of the Local Plan does this representation relate?: Site Allocation WR3w - specific comments on the draft allocation

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.

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: To provide comment on the draft allocation at WR3w - Part of Tesco car park, Portman Road

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: Emma M Runesson

RIDGEPOINT HOMES

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

16th December 2024

Dear Sir/Madam,

**Re: Representations - Local Plan Pre-Submission Draft Partial Update Consultation
WR3w Part of Tesco Car Park, Portman Road**

We are writing to provide a representation to Reading's Local Plan Pre-Submission Draft Partial Update Consultation to specifically comment on the draft housing allocation WR3w in relation to the above site. This covering letter sets out a brief background to the site and provides comments on the proposed dwelling numbers, the draft requirements that any future development should adhere to, the site area, the Proposals Map and the anticipated timescales for delivery.

Background

The site is currently under the single ownership of Tesco Stores Limited and Ridgepoint Homes have a legal option to purchase the land.

A full planning application for residential development comprising 80 apartments was submitted by Ridgepoint Homes to Reading Borough Council in July 2023 and is currently pending determination (ref: 231041/FUL). An amendment to the scheme with a revised application boundary, based on the Site Boundary Plan appended to this letter, is currently being negotiated with Officers.

Dwelling Numbers

The site at "part of Tesco car park, Portman Road" has now been included in the Draft Partial Local Plan Update as a housing allocation under WR3w for 46-68 dwellings based on a site area of 0.59ha.

The inclusion of the site as a draft allocation is welcomed however as noted above, the current full planning application is based on a scheme of 80 apartments. Whilst an amendment to the scheme is currently being negotiated, in the interest of making the most efficient and effective use of a brownfield site as required by national planning policy, it is considered that the site should be capable of accommodating more units than the minimum of 46 units as stated in the draft allocation.

Site Allocation Requirements

WR3w sets out 7 site specific requirements that any development proposal should adhere to. This representation provides comments on two of the site allocation requirements. The specific site allocation



Registered Office: Ridgepoint Homes Ltd, Terriers House, 201 Amersham Road,
High Wycombe, Buckinghamshire, HP13 5AJ
Registered in England and Wales - 05907559
Website: www.ridgepointhomes.co.uk



RIDGEPOINT HOMES

requirements are set out below in italics with commentary to follow. All other requirements included in WR3w are noted and no comment is provided.

Requirement point 1 - Contribute towards an extension and bifurcation of the BUZZ18 bus route, with an increase in daytime, evening and weekend frequency.

The site is sustainably located in Reading West, adjoining the Oxford Road District Centre to the south. There are several bus stops within walking distance of the site, including the Portman Road Tesco bus stop adjoining the petrol station within 50m and the Wantage Road bus stop along Oxford Road to the south within 600m. These bus stops provide ease of access to several local bus routes, including the BUZZ18 bus route, providing connectivity between Central Reading & Reading West, Tilehurst, Theale, Calcot, Basildon, Pangbourne and local schools. A summary of the bus services, routes and frequency is set out below.

Bus Stop	Service	Route	Frequency
Portman Road Tesco	Buzz18	Tilehurst – Central Reading	From 20 minutes
Wantage Road	Purple 17	Tilehurst – Central Reading	From 8 minutes
Wantage Road	Sky Blue 15 / 15a	Central Reading – Theale & Calcot	From 20 minutes
Wantage Road	Sky Blue 16	Central Reading	From 20 minutes
Wantage Road	Route 85	Little Heath School	Once per day
Wantage Road	Route 88	Theale Green School	Once per day
Wantage Road	Route 91	Reading Girls School	Once per day
Wantage Road	Route 93	Reading – Basildon / Pangbourne	From 100 minutes

Comments have been received from Transport Development Control in relation to the pending full planning application (dated 5th September 2023 and appended for reference). These confirm that the site is well connected to the local bus network, ensuring that residents will be offered frequent and realistic opportunities to travel to/from the site to a range of destinations including Central Reading, Tilehurst and Calcot. The comments continue to state that four of the bus services along Oxford Road operate at less than hourly frequencies, whilst the number 17 service operates at an 8-minute frequency throughout a typical weekday.

Transport Development Control has not requested any contribution towards the extension and bifurcation of any bus routes as part of the full planning application discussions which have been ongoing since July 2023.

In light of the sustainable location of the site which is well connection to the local bus network and the fact that this request has not been raised as part of the current full planning application, it is considered that the requirement to contribute towards an extension and bifurcation of the BUZZ18 bus route is not necessary to make the development in acceptable in planning terms and this requirement should be deleted from WR3w.



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High Wycombe, Buckinghamshire, HP13 5AJ
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RIDGEPOINT HOMES

Requirement point 2 - Be accessed from the existing car park access.

The scheme submitted pursuant to the pending full planning application proposes access to the residential development from the western site boundary and not through the existing Tesco car park. This arrangement seeks to separate traffic associated with the Tesco store and the residential parcel in the interest of enhancing the living environment for future residents and to avoid conflicts between residential and retail traffic.

The proposed access from the western boundary has been assessed and designed by professional highways engineers to ensure that the proposed arrangements are safe and adhere to the required standards.

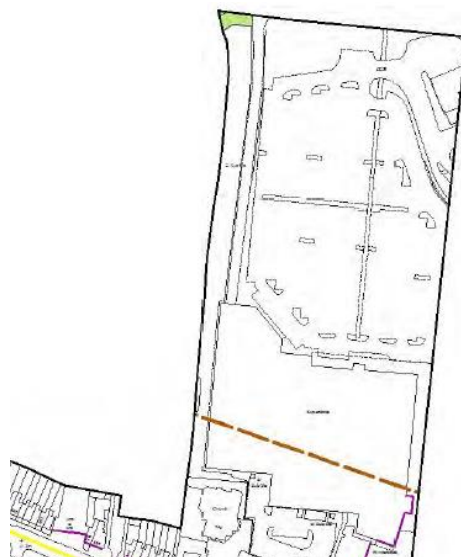
This requirement should therefore be deleted from WR3w.

Site Size: 0.59 ha

The Draft Partial Local Plan Update states that the site area is 0.59ha. As noted in relation to the Background to the site, an amendment to the current planning application is being negotiated based on a revised application boundary reflective of the Site Boundary Plan appended to this letter. The resultant site area would be 0.6 ha and WR3w should therefore be updated to reflect this.

Local Plan Partial Update Proposals Map

The site location is shown on Sheet C and Oxford Road West Inset of the Proposals Map. However, the Partial Update Map has not been updated to show the site allocation as would be denoted by grey shading (extract of the site as shown on the draft Oxford Road West Inset below). The Proposals Map should therefore be updated to denote the site allocation, reflective of the Site Boundary Plan appended to this letter.



RIDGEPOINT HOMES

Delivery Timescales

Figure 10.1 of the Local Plan Partial Update Pre-Submission Draft sets out the overall timescales for site proposals to be delivered. Site WR3w is expected to be delivered in the medium term (2028 – 2033).

As a full planning application is currently pending determination and the site is under single ownership with a legal option for the sale of the land, there are no constraints to the delivery of the site. It is therefore considered that the site is deliverable in the short term and Figure 10.1 should be updated to reflect this.

Summary

Overall, the draft site allocation under WR3w at “Part of Tesco car park, Portman Road” is welcomed and supported. However, we politely request that the requirements for any future development should be amended to delete points 1 & 2 as highlighted in this letter and that the proposed dwelling numbers, site area and Proposals Map are updated.

Yours sincerely



Emma Runesson MRTPI
Planning Manager
T - 01494 781968
M - 07727 146784
E - emma.runesson@Ridgepointhomes.co.uk



Registered Office: Ridgepoint Homes Ltd, Terriers House, 201 Amersham Road,
High Wycombe, Buckinghamshire, HP13 5AJ
Registered in England and Wales - 05907559
Website: www.ridgepointhomes.co.uk



Rodda, Matt (MP)



Matt Rodda MP
House of Commons, London, SW1A 0AA

18/12/24

To whom it may concern,

RE: Pre-Submission Draft of the Partial Update to the Local Plan

I am writing to share my thoughts on the Pre-Submission Draft of the Partial Update to the Local Plan. This is a significant piece of work that has been undertaken by the council, and I am writing to express my support for the draft changes, which will set the course for future development in Reading to ensure that it remains a wonderful place to live, work, study and visit whilst facing the challenges of the future.

Housing

I am glad to see that the plan recognises Reading's growing population and that it puts emphasis on the importance of building new high-quality homes, including council owned and social homes, as well as houses to buy and rent to help families get on the housing ladder.

The plan responds to the findings of the Housing Needs Assessment (HNA), which was finalised in 2024 and identifies the local housing needs for Reading up to 2041, including the current and future need for affordable housing, housing for older people and those with disabilities. Whilst the HNA identified a need for 735 new dwellings each year to meet demand, the Local Plan will aim for the higher annual figure of 825 homes, as was deemed achievable by the Housing and Economic Land Availability Assessment (HELAA) published in 2024. I am glad that the council is being ambitious in its approach to ensuring that Reading's housing needs are met.

The plan recognises that there is a limited amount of land in the borough to develop, and that some land will not be suitable for the purpose due to a number of factors, including the risk of flooding or the rightful protections afforded to parks and green spaces. I am therefore glad that the plan emphasises the importance of development on brownfield sites and making efficient use of the land that is available to boost the delivery of new homes. I am also pleased the plan recognises the importance of both protecting existing housing stock and reusing existing buildings, with tasteful and environmentally friendly modernisation.

History and Heritage

I am glad that the Local Plan recognises Reading's unique heritage and that new development will be in keeping with the existing built environment.

Residents will be pleased that the historic, built and natural environment of the Borough is due to be maintained and enhanced. Furthermore, it is positive that areas of special interest, character and architecture - such as those in designated Conservation Areas - will be conserved and protected.

I am also very pleased to see that the historical significance of Reading Gaol is remarked upon in the plan. The plan states that the site should be put to a use compatible with its heritage, which should include a cultural, leisure or heritage element, that draws on its significance and provides wider benefits to the town centre. Furthermore, it is reassuring that any proposals for additional development must demonstrate that they would not have a detrimental impact on the significant archaeological interest of the site.

Nature and the environment

I am pleased that high environmental standards are being set, with an emphasis on buildings generating renewable energy and on recycling and energy saving. Developments will be required to regard the need to improve air quality and to mitigate the impact that they may have on local biodiversity.

The plan acknowledges that a significant area of land within Reading is at risk of flooding, and that flooding is expected to worsen with the effects of climate change. The plan therefore stipulates that development will be directed to areas at lowest risk of flooding in the first instance and planning permission will only be granted where proposals have fully considered the effects of flooding from all sources.

I am pleased that Reading's waterways and waterside spaces will be protected and enhanced, so that they can continue to contribute to local and regional biodiversity and ecology, flood mitigation, local character, heritage and visual amenity, and provide leisure and recreational opportunities.

I am pleased that the plan mentions Kennet Meadows, which is identified as the largest concentration of areas of biodiversity significance in Reading, and as one of its most significant landscapes. I want the meadows to be preserved as a wildlife habitat and for leisure use and I am pleased the plan recognises their importance of this wonderful green space recreation, such as residents walking in the meadows.

Transport

I am glad that the Local Plan recognises that new development should contribute appropriately to meeting the objectives of the Reading Transport Strategy, or any successor documents, and achieving the council's objectives of: creating a clean and green Reading, supporting healthy lifestyles, enabling sustainable and inclusive growth, connecting people and places, and embracing smart solutions.

The ambition has been set for Reading to achieve a net zero carbon status by 2030, and measures to improve active travel provisions and public transport will play a vital role in this. I am therefore pleased to note the emphasis that will be placed on the enhancement of walking, cycling and public transport facilities, often through integration into new developments, and that priority is due to be given to the implementation of major transport projects across the town.

Employment, recreation and leisure

The plan highlights Reading's important role as the largest population and employment centre in Berkshire, which is one of the economic powerhouses of the UK. It rightly identifies scope to strengthen the role of Reading as the hub for the Thames Valley, providing an accessible focus for the development of employment, housing, services and facilities.

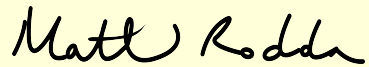
I am pleased that the plan supports the continued strong economic growth that is expected in our area with a proposed net increase of office floorspace, warehouse space, and research development space across the borough.

An emphasis is also placed on the need for a range of types and sizes of units to ensure a healthy and balanced local economy. Efforts will also be made to ensure the continued viability and vitality of the town centre and the network of district and local centres in Reading.

I am glad that leisure, cultural and tourism uses that would attract a wide range of people into the town will be promoted in the plan, and innovative solutions to leisure provision will be encouraged.

I would like to once again state my support for the ambitions outlined in the Partial Update to the Local Plan; this is a plan that reconciles the need for development with the need to protect the natural and historic environment and presents a positive vision for Reading's future.

Yours sincerely,

A handwritten signature in black ink that reads "Matt Rodda". The script is cursive and fluid, with the first letters of "Matt" and "Rodda" being capitalized and prominent.

Matt Rodda MP

Royal Borough of Windsor and Maidenhead

Lucinda Pinhorne-Smy
Planning Policy
Lucinda.Pinhorne-Smy@rbwm.gov.uk
01628 796200



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18 12 2024

To:

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

Dear Planning Policy Team,

Reading Borough Local Plan - Local Plan Pre-Submission Draft Partial Update, November 2024 (Regulation 19)

Thank you for consulting the Royal Borough of Windsor & Maidenhead on the Reading Local Plan Pre-Submission draft Partial Update. Please find below the Royal Borough's response to the Regulation 19 consultation.

The Royal Borough of Windsor & Maidenhead supports the intentions of your ambitious Climate Change and biodiversity policies. The Royal Borough is also supportive of Reading Borough Council's intentions in regard to requiring Health Impact Assessments.

We note that you do not propose to meet your full housing need figure, which you will seek to justify at examination stage. However, if the outcome of the examination is to increase your housing target beyond that stated in the Local Plan Pre-Submission Draft Partial Update, the Royal Borough would not be in a position to assist with meeting any unmet need as per our previous correspondence on this matter.

This response has been approved by Councillor Bermange, Cabinet Member for Planning, Governance and Asset Management and the Council's Assistant Director of Planning, Adrien Waite.

Royal Borough of Windsor & Maidenhead
Town Hall, St. Ives Road, Maidenhead, SL6 1RF

www.rbwm.gov.uk customer.service@rbwm.gov.uk **01628 683800**

@rbwm search: rbwm

Yours Faithfully

I.D. Motuel

Ian Motuel

Planning Policy Manager

Samuel Smith Old Brewery (Tadcaster)

(Response from webform)

Title: -

First name: -

Last name: Samuel Smith Old Brewery (Tadcaster)

Would you like to include the contact details of an agent(s)?: Yes

Agent's Title (if applicable): Mr

Agent's First Name (if applicable): Craig

Agent's Last Name (if applicable): Stewart

Agent's Job Title (if applicable):

Agent's Organisation (if applicable): MRPP

Agent's Address Line 1 (if applicable):

Agent's Address Line 2 (if applicable):

Agent's Address Line 3 (if applicable):

Agent's Address Line 4 (if applicable):

Agent's Telephone Number (if applicable):

Agent's Post Code (if applicable):

Agent's E-mail Address (if applicable): craigstewart@mrpp.co.uk

To which part of the Local Plan does this representation relate?: CR14s

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.

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

Author name: Craig Stewart

Our Ref: 3216/CS/LT20241209

18th December 2024

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Dear Sir/Madam,

REPRESENTATIONS TO THE READING BOROUGH LOCAL PLAN PARTIAL UPDATE CONSULTATION UNDER REGULATION 19 (NOVEMBER 2024)

On behalf of our client, Samuel Smith Old Brewery (Tadcaster), we hereby submit representations to the above emerging Plan.

These representations concern the proposed allocation of the site at 20-22 Duke Street, Reading, under Policy CR14s. In particular, while the allocation for residential development is supported, the specifications of Policy CR14s should be updated to fully maximise the capacity and deliverability of the site.

Allocation under Policy CR14s: 20-22 Duke Street

The draft Plan is clear that there is, and will continue to be, an acute need for new housing within the Borough, and that owing to the nature of the Borough, brownfield land will need to be identified and optimised to deliver as much housing as possible to meet this need. This is reflective of the direction of travel in national planning policy. For this reason the allocation of 20-22 Duke Street for residential development is strongly supported.

However in light of the above, it is considered that the allocation set out at draft Policy CR14s relating to the site at 20-22 Duke Street would fail to optimise the site's opportunity and would thus not be positively prepared.

Policy CR14s sets out that the site would be capable of accommodating 12-18 dwellings. This figure appears to have been derived through the HELAA process with the blanket application of an 'urban density' of 112 dwellings per hectare (dph). Policy H2, however, sets out a minimum density for residential development within the Town Centre of 260dph, and no justification has been provided so as to explain the substantial reduction from this figure.

Further, the HELAA appears to have further reduced the site area and thus the total capacity through the assumption that a 10m buffer to the river would be applied. Matters of this specificity would be dealt with at application stage, and such assumptions should

not be applied to cap the amount of development that can be delivered on this site through the allocation.

It is therefore considered that the site capacity set out within the Policy's text should be substantially increased to reflect the capability of the site to accommodate up to 30 dwellings.

Further, Figure 10.1 denotes that CR14s would be delivered in the 'medium term' (2028-33). The site would not suffer from any significant planning, legal or ownership constraints, and would thus be capable of delivering homes within the early part of the plan period.

Finally, the criteria within the Policy relating to the scheduled ancient monument and heritage assets should be amended so as to align with the development management tests for assessing any harms that may arise. I.e. the criteria should reference "unacceptable impact" (our emphasis) as the assessment criteria for compliance with the allocation. This would ensure that the allocation remains deliverable but that any impacts are fully assessed and taken into account in the assessment of a planning application on the site.

To conclude, while the principle of the site's allocation for residential uses is strongly supported, the allocation's site capacity and other criteria should be amended so as to maximise the potential and deliverability of the site.

We trust that these representations will assist the Council in the continued preparation and development of the Local Plan Partial Update, and are willing to discuss the content of any of these representations.

Yours sincerely,



Martin Robeson

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SEGRO plc



Response to Reading Borough Local Plan Partial Update (Pre- Submission Draft)

Island Road, Reading

December 2024

Prepared for:
SEGRO plc

Prepared by:
Scarlett Lambeth / Mark Sitch

Project Number:
333100992

Response to Reading Borough Local Plan Partial Update (Pre-Submission Draft)

Revision	Description	Author	Date	Quality Check	Date	Independent Review	Date
A	Final	SL / JP	Dec 2024	BDC	Dec 2024	MXS	Dec 2024



Response to Reading Borough Local Plan Partial Update (Pre-Submission Draft)

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Prepared by: Scarlett Lambeth / Jonathan Protheroe

SL / JP

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BDC

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MXS



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1 Introduction

- 1.1.1 Stantec is instructed by SEGRO plc ('SEGRO' hereafter) to prepare a response to the Reading Local Plan Partial Update, Regulation 19 Consultation (the 'Pre-Submission Draft').
- 1.1.2 This representation is made in respect of the Reading Local Plan, and with reference to SEGRO's land interests at Island Road, Reading (the 'Site'). A Site Location Plan (Drawing No. 30487/FE/076) is included at Appendix 1. The Site forms part of the strategic employment allocation at Policy SR1 (Island Road Major Opportunity Area) and in particular Policy SR1a of the Pre-Submission Draft Plan. This is an update to Policy SR1 (Island Road Major Opportunity Area) in the adopted Reading Local Plan.
- 1.1.3 In terms of updates to the Site allocation at Policy SR1, the Local Plan Partial Update seeks to update the policy to take account of the latest development position of the wider Island Road Major Opportunity Area allocation. This is particularly relevant given Policy SR1 is formed of three sub-area allocations (SR1a, SR1b and SR1c) and SR1b has been built out. Policy SR1a has also been updated to take account of the extension to the Detailed Emergency Planning Zone (DEPZ) at AWE Burghfield.
- 1.1.4 We have previously made representations to the Reading Local Plan process on behalf of SEGRO, to both the now adopted Reading Local Plan and the Regulation 18 consultation for the Reading Local Plan Partial Update.
- 1.1.5 SEGRO supports the continued allocation of the Site through Policy SR1: Island Road Major Opportunity Area and remain committed to the delivery of the largest employment allocation in the adopted Reading Local Plan and as proposed in this Reading Local Plan Partial Update.
- 1.1.6 SEGRO welcomes the opportunity to comment on this Reading Local Plan Partial Update.
- 1.1.7 This representation follows the structure and order of the Pre-Submission Draft Local Plan and comments on relevant policies.
- 1.1.8 This representation has the underlying aim of ensuring that all policies are legally compliant and align with the 'tests of soundness' as outlined at Paragraph 35 of the NPPF. These include the following:
- a. Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b. Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c. Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d. Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

1.2 SEGRO

- 1.2.1 SEGRO is a leading owner, asset manager and developer of modern warehousing and logistics, light industrial and data centre property. SEGRO aim to champion low carbon growth, invest in local communities and environments, and nurture talent.



2 National Planning Policy Framework (December 2023)

2.1.1 Paragraph 35 of the National Planning Policy Framework ('NPPF') sets out the tests which Local Plans are assessed against at examination.

2.1.2 Plans are 'sound' if they are:

'35(a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

35(b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

35(c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

35(d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.'

2.1.3 Planning Practice Guidance (PPG) provides further advice on Plan making and how these tests can be met. Throughout these representations, we set out whether we consider each policy complies with the tests of soundness as set out above.

2.1.4 As the Council will be aware, a draft new NPPF was published for consultation in summer 2024 and it is anticipated that the new NPPF will be finalised shortly and before the end of this year. We recognise the Council are currently preparing this Local Plan under the current framework (December 2023).

2.1.5 It should be noted that the proposed new NPPF continues to support economic growth through the provision of appropriate sites for commercial development (including freight and logistics) to meet the needs of a modern economy.



3 Viability Assessment

- 3.1.1 The PPG clarifies that the role for viability assessment is primarily at the plan making stage and that 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. It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers (Paragraph: 002 Reference ID: 10-002-20190509).
- 3.1.2 SEGRO are concerned that the Policies in the Pre-Submission Draft of the Local Plan Partial Update are not 'justified' in accordance with paragraph 35(b) of the NPPF. They have not been tested for viability and thus the plan cannot be considered to have met the test of 'soundness' as detailed in paragraph 35 of the NPPF and consequently proceed to examination having not been prepared in accordance with legal and procedural requirements.
- 3.1.3 The Sustainability Appraisal provided as part of the evidence base of the Local Plan Pre-Submission Draft Partial Update summarises the Council's position in relation to the viability testing of their policies which details that the Whole Plan Viability Assessment is "emerging", and it has been commissioned to ensure that the plan is deliverable and that individual policies do not have the effect of rendering development unviable.
- 3.1.4 The Whole Plan Viability Assessment has not been included as part of Regulation 19 Consultation. No other viability testing of the updated policies of the Draft Local Plan has been provided as part of the evidence base. Until this evidence has been submitted and is made public the Council have not demonstrated the viability of the updated or new Policies in the Draft Local Plan.
- 3.1.5 SEGRO consider that a number of the updated and new policies in the Draft Local Plan are not realistic and will undermine the deliverability of the plan. Given the lack of viability evidence provided by the Council at this stage SEGRO have reviewed the Policies of the Draft Local Plan and requested a number of changes to be made to some of the Policies in order for the plan to be deliverable and proceed towards examination. These requested changes are set out below.



4 Policy CC2: Sustainable Design and Construction

- 4.1.1 SEGRO are committed to tackling climate change with the aim of being net-zero carbon by 2030. SEGRO is committed to playing their part in tackling climate change and have their own corporate commitments in the 'Responsible SEGRO' Framework. Through this, SEGRO will play a leading role in their industry's response to the low carbon imperative by setting demanding targets and is committed to working with their customers and suppliers to reduce their emissions.

4.2 Net Zero Requirement

- 4.2.1 SEGRO note that a number of new requirements have been added to Policy CC2 in the Pre-Submission Draft which non-residential development proposals must comply with. The feasibility and viability of the proposed changes within the policy have not been tested and SEGRO consider that these requirements would make the plan undeliverable.

- 4.2.2 For example, the Policy has been amended to state that:

"All major non-residential developments or conversions to residential are required to achieve net-zero development 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."

- 4.2.3 The Council will be aware of the Written Ministerial Statement entitled '*Planning – Local Energy Efficiency Standards Update*' dated 13th December 2023 ('the WMS') which states:

"The Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
- The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).

- 4.2.4 To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one."

- 4.2.5 This WMS was subject a legal challenge on several grounds, but primarily that the WMS unlawfully sought to restrict local planning authorities of their statutory powers (specifically the ability to set policies in their development plans seeking energy efficiency standards which exceed building regulations, as allowed by the Planning and Energy Act 2008). This challenge which was dismissed at the High Court in June 2024 in *R (Rights Community Action) v Secretary of State for Levelling Up, Housing And Communities* [2024] EWHC 1693 (Admin).



- 4.2.6 This Judgment provides helpful clarification that the Written Ministerial Statement does not prevent local authorities proposing local energy efficiency standards that go beyond current planned building regulations as long as they present a well-reasoned and robustly costed rationale that ensures development remains viable.
- 4.2.7 The Council have not provided a viability assessment of the amendment to this Policy and in accordance with this Written Ministerial Statement the Council should not be proposing local energy efficiency standards for buildings that go beyond current or planned buildings regulations.

Requested Changes

- 4.2.8 Based on the above, for the policy to be considered to be 'justified' and 'consistent with national policy' in accordance with NPPF paragraphs 35(b) and 35(d), the policy should be revised so that the requirement for development to be net zero is aspirational. This change would not prevent net zero development from coming forward, but also ensures that development remains viable and aligns with the prevailing government-led standard.
- 4.2.9 The requested policy change is set out below:

“All major non-residential developments or conversions to residential ~~are required~~ **should aspire** to achieve net-zero development 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.”

4.3 Water Efficiency Requirement

- 4.3.1 The policy requires that:

“All non-residential development or conversions to residential must be designed to be water efficient and reduce water consumption in accordance with the ‘fittings approach’ detailed within the Building Regulations. Proposals that achieve water neutrality will be particularly supported. Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy- and cost-effective.” [emphasis added]

- 4.3.2 SEGRO consider that it is beyond the scope of planning policies to prescribe specific Building Regulations that development must comply with. There are many ways for a non-residential building to be designed to be water efficient beyond just the ‘fittings approach’ and consider that the policy should be amended to reflect this reality, particularly as it will not be a feasible requirement for all developments.

Requested Changes

- 4.3.3 For the policy to be considered to be 'justified' and 'consistent with national policy' in accordance with NPPF paragraphs 35(b) and 35(d), the policy should remove the requirement for non-residential development to comply with specific Building Regulations:

“All non-residential development or conversions to residential must be designed to be water efficient and reduce water consumption ~~in accordance with the ‘fittings approach’ detailed within the Building Regulations.~~ Proposals that achieve water neutrality will be particularly supported. Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy- and cost-effective.”



4.4 BREEAM Requirement

- 4.4.1 SEGRO support the requirement for major development to meet BREEAM 'Excellent', but would be concerned if this was only 'Outstanding'. This is currently difficult to achieve. The requirement is an 'or' and therefore we do not object to this wording.

4.5 Exceptional Basis Clause

- 4.5.1 SEGRO support the flexibility provided by the exceptional basis clause which states that in cases where the points in Policy CC2 cannot be met, the highest possible standards are required. For clarity, SEGRO request that the wording of this clause is amended to reflect that the highest realistic standards are required, as the highest possible standard implies that the technical, viability or other policy reasons for not meeting the points are not taken into consideration when assessing whether these standards have been met.

Requested Changes

- 4.5.2 For the policy to be considered to be 'justified' in accordance with NPPF paragraph 35(b), the clause should be amended to reflect the highest realistic standards:

"Exceptional basis clause: In cases where the above points cannot be met for technical, viability or other policy reasons (such as heritage), the highest realistic possible standards are required."



5 Policy CC3: Adaption to Climate Change

- 5.1.1 Policy CC3 states that all development will demonstrate how they have been designed to mitigate the risks of overheating, flooding and extreme storms.

5.2 First Bullet Point to Policy CC3

- 5.2.1 SEGRO consider that the first bullet point in Policy CC3 is too prescriptive in its requirements and does not allow for individual development sites to be considered on a site-by-site basis.
- 5.2.2 Firstly, the text 'wherever possible' in regard to new buildings being orientated to maximise opportunities for both natural heating and ventilation and reducing exposure to wind and other elements, should be reinstated as worded in the adopted Reading Local Plan. This is because as currently drafted in the Pre-Submission Draft, the policy puts maximising opportunities for natural heating and ventilation and reducing exposure to wind and other elements at the highest priority when determining the orientation of a new building. When deciding on the orientation of a new building there are a range of factors to consider and such a prescriptive policy requirement when designing a scheme will ultimately lead to bad design. The policy does not allow for site specific circumstances to be taken into consideration and other design considerations are automatically pushed lower down the order of priorities when determining the orientation of a new building.
- 5.2.3 Secondly, the measures required for new buildings are not feasible for the erection of all new buildings and places too heavy a burden on the operational requirements of that building. In many cases it would not be possible for a new building to deliver all of the measures prescribed in the policy, for example, not all buildings would be able to sustain a green or brown roof. Consequently, SEGRO request that the wording of Policy CC3 and the proposed strategies include sufficient flexibility to allow targets and requirements to be negotiated on a site-by-site basis. This would ensure that consideration towards the feasibility and viability of proposed climate change mitigation measures would have regard to a site's context.

Requested Changes

- 5.2.4 Based on the above, for the policy to be considered to be 'justified' in accordance with NPPF paragraph 35(b), additional flexibility should be afforded to the policy so it does not prevent otherwise sustainable, policy compliant development from coming forward:

"Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements. Proposals involving both new and existing buildings ~~must~~ shall where practical be designed to maximise resistance and resilience to climate change by including the following measures depending on the suitability for that specific development:

- Solar shading,
- Thermal mass,
- Appropriate heating and ventilation of the building,
- Appropriately coloured materials in areas exposed to direct sunlight,
- Green and brown roofs, and
- Green walls."



5.3 Third Bullet Point to Policy CC3

- 5.3.1 SEGRO consider that it is beyond the scope of planning policies to prescribe a single specific measure to address the risks of overheating that development must comply with. There are many ways for a non-residential building to be designed to address the risks of overheating beyond just the passive cooling measure. This specific measure will not be the most effective measure for all developments and thus the policy should be amended to reflect that other measures may be more effective.

Requested Changes

- 5.3.2 For the policy to be considered to be 'justified' and 'consistent with national policy' in accordance with NPPF paragraphs 35(b) and 35(d), the policy should remove the requirement for non-residential development to use the passive cooling measure:

"All development must address the risks of overheating through appropriate ~~passive cooling and~~ energy efficiency measures in the first instance;"

5.4 Fourth Bullet Point to Policy CC3

- 5.4.1 SEGRO do not support the proposed amendment to the fourth bullet point of the policy and suggest the Council revert to the previous wording of this bullet point from the adopted Reading Local Plan.

Requested Changes

- 5.4.2 For the policy to be considered to be 'justified' in accordance with NPPF paragraph 35(b), the policy should be reflective of development scenarios where it is not possible to incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change:

"All development shall ~~must~~ minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change."



6 Policy CC4: Decentralised Energy (Strategic Policy)

6.1 Decentralised Energy Provision for Non-Residential Development over 1,000 sqm

- 6.1.1 Policy CC4 requires non-residential development of over 1,000 sqm to include decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable.
- 6.1.2 SEGRO support the flexibility within the policy. This will ensure that the feasibility and viability of including decentralised energy can be considered on a site-by-site basis, subject to the necessary testing and evidence.



7 Policy CC7: Design and the Public Realm (strategic policy)

7.1 Off-site Public Realm Improvements and Maintenance

7.1.1 Policy CC7 states that:

“Applications for major developments should be accompanied by a design and access statement that deals with all matters listed above and may be expected to improve and maintain the public realm of the surrounding area. For minor applications, the issues above should be addressed within a planning statement.

In instances where on-site provision is not sought, applicants may be required to make financial contributions towards public realm improvements.”

7.1.2 Paragraph 57 of the NPPF states that:

“Planning obligations must only be sought where they meet all of the following tests²⁴:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.”

7.1.3 SEGRO support good design and public realm improvements onsite for major development proposals. However, SEGRO considers that the policy which suggests developers improve and maintain the public realm of the surrounding area is an inappropriate planning policy. Requiring applicants for major developments to improve and maintain the public realm of the surrounding area to the application site is a particularly onerous and impractical policy requirement given the likelihood of relying on third-party land to deliver improvements and maintenance to the public realm of the offsite surrounding area to a site development proposal. This also raises further concerns in respect of site deliverability.

7.1.4 SEGRO do not object to the principle of financial contributions towards offsite public realm improvements but only where it is feasible, necessary and practical to do so.

Requested Changes

7.1.5 For the policy to be considered to be 'justified' in accordance with NPPF paragraph 35(b) the Policy should remove the onerous requirements for applications to deliver off-site public realm improvements and maintenance and should be worded so that off-site public realm improvements are delivered where feasible, necessary and practical:

“Applications for major developments should be accompanied by a design and access statement that deals with all matters listed above ~~and may be expected to improve and maintain the public realm of the surrounding area~~. For minor applications, the issues above should be addressed within a planning statement.

7.1.6 In instances where on-site provision is not sought, applicants may be required to make financial contributions towards public realm improvements **where feasible, necessary and practical.**”



8 Policy EM1: Provision of Employment Development (Strategic Policy)

- 8.1.1 Paragraph 85 of the NPPF informs 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.

8.2 Off-site Public Realm Improvements and Maintenance

- 8.2.1 Paragraph 31 of the NPPF states the following in relation to preparing and reviewing plans:

“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”

- 8.2.2 SEGRO support that the amendment to Policy EM1 which increases the Borough's employment need over the Plan period to 167,000 sqm of industrial, warehouse and/or research and development space. This is broadly in-line with the Council's estimate that there has been an increase in industrial and warehouse space of around 20,000 sqm since the Reading Local Plan was adopted. However, this still leaves a substantial amount of industrial and warehouse space to be delivered over the Plan period. Since the evidence base prepared for the now adopted Plan was prepared market conditions have changed whereby industrial and warehouse occupiers are now seeking modern space, often with larger footprints and taller buildings than existing stock. These factors should be reflected in Policy EM1.

Requested Changes

- 8.2.3 In order for the Policy to be 'positively prepared' and so that takes into account relevant market signals in-line with Paragraphs 35(a) and 31 of the NPPF it should recognise the demand in the market which has led to occupiers seeking increasingly taller buildings and larger footprints.

“A Commercial Development Needs Assessment (CDNA) for Reading was carried out in 2024, which identified the level of need for additional office, industrial, warehouse or research and development space between 2023 and 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 2023 and 2041 are:

- 85,803 of office floorspace; and
- 167,113 sq m of industrial, warehouse and research and development floorspace.”

- 8.2.4 Figures are rounded in Policy EM1, as such an assessment can never be entirely precise. The levels of need identified above are before application of a safety margin and an allowance for future losses. In terms of the allowance for future losses, it is not appropriate to incorporate this within the policy for two reasons. Firstly, as for housing, the Local Plan requirement should be based on net change. Many of the allocations in this plan will result in either a loss or gain of employment floorspace, and should be considered in net terms. Secondly, it is within the power of the LPA to prevent much (although not all) of this floorspace loss if it is appropriate to do so. In terms of the safety margin (which is applied to industrial, warehouse and research and development only), which equates to two years' supply, the limited nature of available sites and the high levels of need for other uses, including housing, means that there is not scope to provide this additional allowance in Reading over the plan period. **It is recognised that since the adoption of the Reading Local Plan the operational requirements of employment buildings has**



changed due to evolving market conditions whereby industrial and warehouse occupiers are increasingly seeking modern spaces and facilities often with larger footprints and taller buildings than existing stock.”



9 Policy EN19: Urban Greening Factor

- 9.1.1 SEGRO objects to the introduction of Policy EN19 in the Pre-Submission Draft.
- 9.1.2 The rigid requirements to deliver a certain percentage score of Urban Greening Factor for different types of development places a significant burden on development.
- 9.1.3 In relation to introducing Urban Greening Factors into Planning Policies for industrial and warehouse development there is a well-documented precedent for this via the examination of the London Plan in 2019, with Paragraph 451 of the Inspector's Report stating:
- “...the scope to undertake most of the Urban Greening Factors for industrial and warehouse development is limited and would therefore be difficult to achieve. A green roof is the most likely option with additional construction costs, loading and maintenance issues. The evidence on viability is not convincing. The Mayor seeks to address this by means of a further suggested change to the reasoned justification which recognises the challenges and indicates that this can be considered on a case by case basis with further guidance to be developed. However, the policy would take effect once the Plan is published and would be liable to inhibit development within use classes B2 and B8. Until further evidence has been produced about the practical implications for development of this kind it should be excluded from the policy.”
- 9.1.4 In addition, the viability of this new policy has not been tested and SEGRO consider that this constraint on development would make the plan undeliverable and prevent otherwise sustainable development that accords with the other policies of the Draft Local Plan from coming forward.
- 9.1.5 For the Plan to be 'justified' in accordance with Paragraph 35(b) of the NPPF, SEGRO strongly recommend Policy EN19 and consequently Appendix 3: Urban Greening Factor are removed entirely.



10 Policy SR1: Island Road Major Opportunity Area (Strategic Policy)

- 10.1.1 SEGRO recognise the strategic nature of the Site and its ability to deliver high-quality employment which will contribute towards Reading Borough's employment needs and the provision of a significant number of jobs. SEGRO support the continued allocation of the Site and its recognition as a major opportunity area.

10.2 Figure 6.2

- 10.2.1 SEGRO agree with the update to Figure 6.2 of the adopted Local Plan which reflects the latest position of development on the Site (with the removal of SR1b as the development has been completed).

10.3 Range of Floorspace for Policy SR1

- 10.3.1 SEGRO support the removal of the identification of approximately 120,000 sqm to 150,000 sqm of new business space from Policy SR1 given it would be more appropriate to identify achievable amounts of floorspace on a site-specific basis, particularly now that sub-area SR1b of the Island Road Major Opportunity Area has been completed. Whilst reference to the figures of 120,000 sqm to 150,000 sqm have been removed from Policy SR1, SEGRO note that the indicative floorspace requirements for sub-area SR1a have been updated. Policy SR1a is now required to provide an indicative floorspace of 90,000 sqm – 133,000 sqm (this was previously 95,000 sqm – 116,000 sqm) of industrial / warehouse / Research and Development uses. SEGRO support the increased indicative potential of the floorspace for the Site and consider that this provides further flexibility in the range of floorspace brought forward on site.

10.4 Uses Identified in Policy SR1

- 10.4.1 Paragraph 31 of the NPPF states the following in relation to preparing and reviewing plans:

“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”

- 10.4.2 SEGRO note the identification of research and development uses for the Site, as set out at Policy SR1a. However, SEGRO requests that the policy avoids requiring all the uses identified (industrial, warehouse and research and development) to be present as part of an application on the SR1a allocation. It is considered that a mix of uses or a single use is proposed for the Site which responds to market needs and demand within the area. Thus, SEGRO support additional flexibility in the wording of the policy to ensure that an appropriate mix of uses can come forward in response to employment market demand and the policy does not require the delivery of all uses identified in the allocation to be proposed for an acceptable allocation.

Requested Changes

- 10.4.3 For the policy to be considered to be 'justified' and so that takes into account relevant market signals in-line in accordance with Paragraphs 35(a) and 31), the policy should ensure that an appropriate mix of uses can come forward on the Council's largest employment allocation:

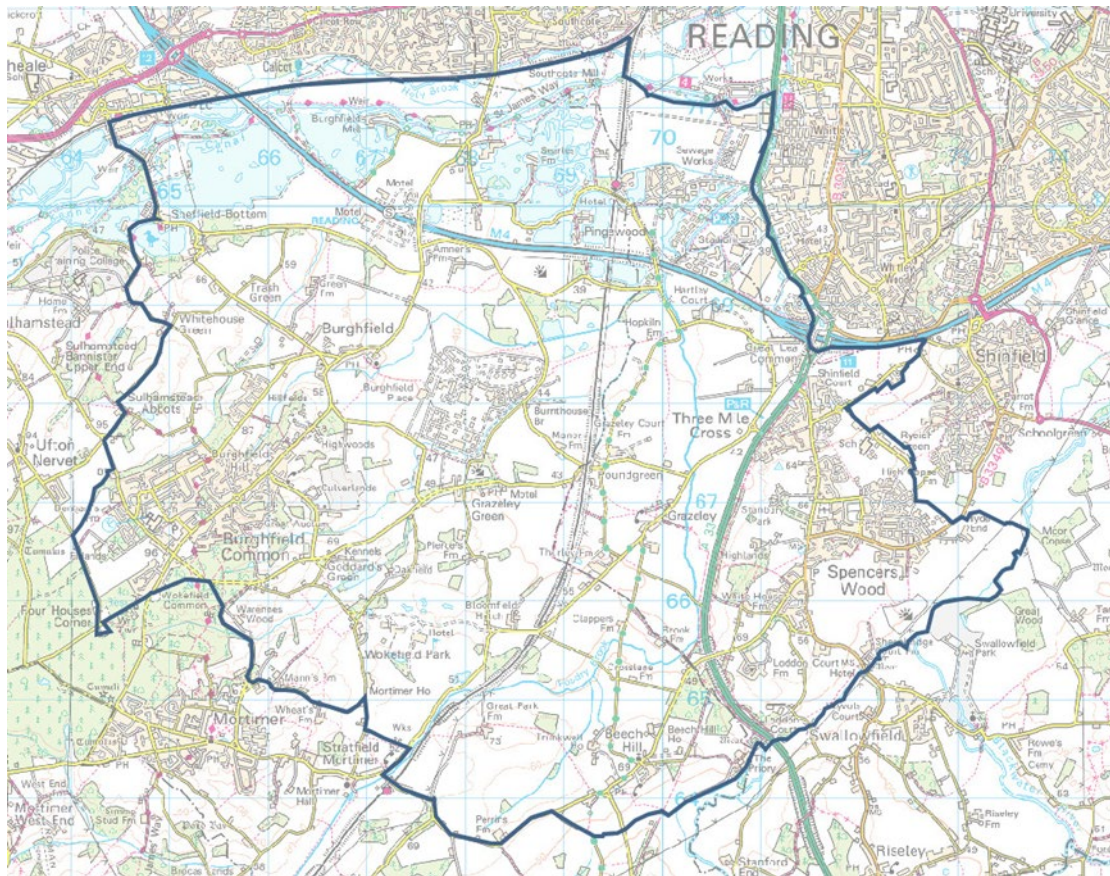
“SR1: ISLAND ROAD MAJOR OPPORTUNITY AREA (Strategic policy)

Development in the Island Road Major Opportunity Area will provide new business space comprising **an appropriate mix of** mainly industrial and, warehouse and research and development uses, with some supporting office uses.”



10.5 Detailed Emergency Planning Zone (DEPZ) of Atomic Weapons Establishment (AWE) Burghfield

- 10.5.1 SEGRO note the change to the Detailed Emergency Planning Zone (DEPZ) around the AWE Burghfield which is reflected in the Local Plan Partial Update. In 2020, the DEPZ around AWE Burghfield was extended and now includes additional parts of Reading. The DEPZ includes the Site and its allocation as the Island Road Major Opportunity Area in the adopted Local Plan. The extension to the DEPZ has arisen as a result from changes in the relevant legislation. Under the Radiation (Emergency Preparedness and Public Information Regulations) (REPPiR) (2019), a DEPZ must be determined by the local authority where the nuclear site is situated. This process was undertaken in 2019 and reviewed in 2023. Under legislation, formal reviews of the DEPZ are required to be undertaken at least every three years or as a result of a material change in work with ionizing radiation. The below plan illustrates the extent of the AWE Burghfield DEPZ following its review and update in 2023.



AWE Burghfield – Updated Detailed Emergency Planning Zone

- 10.5.2 SEGRO consider that the extent of the DEPZ will need to be weighed against other factors such as the allocation of the Site in an adopted Local Plan and the Council's expectation it will be developed to deliver significant investment, jobs, and rates for the Borough. It is considered that the delivery of the Site and its ability to meet substantial employment need is a significant factor weighing in favour of its redevelopment and this should be considered when a planning application for the Site is submitted. This is particularly relevant when noting the urban nature of Reading and the limited space available within the Borough to deliver a strategic employment development which can significantly contribute towards the local economy.
- 10.5.3 However, SEGRO request that additional wording and clarity is included within the policy to acknowledge that planning applications on the allocation that are in accordance with the necessary requirements of the DEPZ should be approved without delay.

Requested Changes

- 10.5.4 For the policy to be considered to be 'justified' in accordance with NPPF paragraph 35(b) the Policy needs to acknowledge that planning applications on the allocation that are in accordance with the necessary requirements of the DEPZ should be approved without delay:
- 10.5.5 Therefore, paragraph 6.3.6 of the Pre-Submission Draft Local Plan should be amended to read "Planning applications that are in accordance with the necessary requirements of the DEPZ and Policy SR1 should be approved without delay".



11 Policy TR5: Car and Cycle Parking and Electric Vehicle Charging

11.1 Electric Vehicle Charging Points

- 11.1.1 SEGRO note the increase of the requirement in the Pre-Submission Draft for non-residential developments of at least 10 spaces to provide 20% of spaces with an active electric vehicle charging point which has risen from the 10% provision in the adopted Reading Local Plan.
- 11.1.2 SEGRO consider that the requirement for 20% of spaces to be provided with an active electric vehicle charging point is without sufficient evidence or viability testing. We therefore consider the 10% requirement in the adopted Reading Local Plan to be appropriate. SEGRO recognise the Council's desire to see additional electric vehicle charging infrastructure delivered to meet climate change and sustainability objectives and therefore suggest an alternative of providing provision for future connections for electric vehicle charging points for all spaces.

Requested Changes

- 11.1.3 Based on the above, for the policy to be considered to be 'justified' and 'consistent with national policy' in accordance with NPPF paragraphs 35(b) and 35(d) the Policy should be aspirational, so it does not prevent otherwise sustainable, policy compliant development from coming forward:

“• Within communal car parks for residential or non-residential developments of at least 10 off-road parking spaces, 10% ~~20%~~ of spaces should provide an active electric vehicle charging point and ducting provided for future connections for electric vehicle charging points for all spaces.”

and

“Therefore, for non-residential car parks with at least 10 spaces, at least 10% ~~20%~~ of spaces should provide an active charging point.”



12 Policy OU2: Hazardous Installations (Strategic Policy)

12.1.1 SEGRO note the requirements to review the extent of the DEPZ as required by legislation and the need for developments located within the zone to be capable of being accommodated within the Offsite Emergency Plan for AWE Burghfield. West Berkshire Council are responsible for preparing the Offsite Emergency Plan which sets out protective actions which would be implemented without delay to mitigate the likely consequences of a radiation emergency, along with the other agencies involved in the plan. It is noted that the Offsite Emergency Plan is not a public plan. As such, whilst the proposed updates to Policy SR1 note that proposals must be capable of being accommodated within the Offsite Emergency Plan for AWE Burghfield, it is considered that further information on what this constitutes and the measures proposals located within the DEPZ must seek to provide appropriate protective actions.

12.1.2 In addition to the above, Policy OU2 goes on state that:

“Any proposal for development within the Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield (AWE B), shown on the Proposals Map or as subsequently amended, that would increase the residential or non-residential population and level of activity will not be acceptable unless:

- it does not prejudice the security and future of AWE B; and
- any increase in population within the DEPZ can be accommodated in the context of the AWE B Off-Site Emergency Plan (or any successor).”

12.1.3 Given the Site is the largest employment allocation in the adopted Local Plan and Local Plan Partial Update, SEGRO consider that the geographical extent and amount of floorspace should not be restricted or limited by the DEPZ and request that reference to this is made within the policy. This is particularly relevant given the Site forms one of the only available spaces for development within the urban area of Reading that can accommodate a strategic quantum of employment space.

12.1.4 It is recognised that a significant employment need remains in Reading and its neighbouring authorities, as evidenced by the existing demand and supply for employment and logistics space. It is considered that recognition needs to be given to existing allocations identified in the adopted Local Plan Partial Update.

12.1.5 Therefore, it is requested that Policy OU2 has regard to the existing allocations within the adopted Local Plan and the proposed floorspace delivered by these proposals is not restricted, and reviewed on a site-specific basis.



13 Summary

- 13.1.1 These representations are made on behalf of SEGRO in response to the Reading Local Plan Partial Update (Regulation 19) Consultation (the 'Pre-Submission Draft') in respect of their land interests at Island Road, Reading (Policy SR1: Island Road Major Opportunity Area).
- 13.1.2 SEGRO acknowledges the work the Council has undertaken in relation to updating the Reading Local Plan and continue to support the allocation of the Site through Policy SR1: Island Road Major Opportunity Area. SEGRO remain committed to the delivery of the largest employment allocation within the adopted Reading Local Plan and the Local Plan Partial Update, and wish to emphasise the importance of the Site's allocation in meeting employment needs and promoting economic growth within Reading. To ensure that the Site can come forward as expected without delay, a number of changes have been requested to the Plan to ensure its compliance with the tests of soundness, as detailed in the NPPF, and its subsequent procedure to examination and adoption.
- 13.1.3 We trust that the above comments will be taken into consideration as part of the ongoing preparation of the Local Plan Partial Update. As set out in recent discussions, we would continue to welcome the opportunity to meet and discuss our responses with you in more detail.
- 13.1.4 We look forward to being included in the next steps of the consultation process. Subject to the Council's consideration and response to the above, SEGRO requests the opportunity to participate in the Examination hearings.
- 13.1.5 In the meantime, if you require any further information or wish to discuss this matter in more detail, please do not hesitate to contact us in the first instance.
- Mark Sitch, Planning Director at Stantec - mark.sitch@stantec.com
 - Scarlett Lambeth, Senior Planner at Stantec - scarlett.lambeth@stantec.com



Appendix A Site Location Plan





NOTES:

SUBJECT TO STATUTORY CONSENTS

SUBJECT TO SURVEY

BASED ON OS MAP REPRODUCED BY PERMISSION OF
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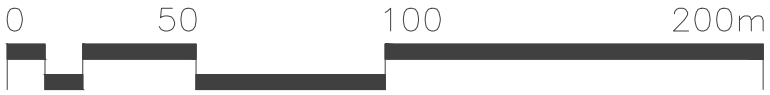
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MICHAEL SPARKS ASSOCIATES OF ANY DISCREPANCIES

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SITE PLAN

1:2000



-	25/11/2024	First issue	GZ	AC
REV	DATE	NOTE	DRAW	CHK



SEGRO

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TITLE
ISLAND ROAD, READING
DRAWING
SITE PLAN

CLIENT
SEGRO

DATE NOVEMBER 2024	SCALE 1:2000 @ A1	DRAWN GZ
STATUS FEASIBILITY	CHECKED AC	

DRAWING NUMBER
30487 / FE / 076

SH Reading Master LLP

DM/KG/DP4815
17th December 2024

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Dear Sir/Madam

REPRESENTATIONS ON THE READING BOROUGH COUNCIL LOCAL PLAN PARTIAL REVIEW (REGULATION 19) ON BEHALF OF STATION HILL READING MASTER LLP

Thank you for providing us with the opportunity to comment on the Regulation 19 Draft Local Plan Partial Update of the Reading Borough Council Local Plan. These representations have been submitted on behalf of SH Reading Master LLP (a joint venture between Lincoln Property Company and MGT Limited) in relation to their land ownership at Station Hill, Reading.

Background

There is a long planning history to Station Hill (the “Site”) with various different owners bringing forward development proposals since the early 2000s. These previous owners did not unlock the Site and secure the delivery of much needed regeneration. SH Reading Master LLP then acquired the Site in 2018 and brought forward a series of revised planning permissions between 2019-2022. This ultimately led to new development coming forward on this critically important Site in the centre of Reading Town Centre. To date, Phase 1 (residential and commercial) has been delivered and now occupied. Phase 2 (office) has recently completed and will be occupied in 2025. Together, these phases have consisted of a landmark £750 million investment into the Borough and delivery of up to 1,300 new homes, 95,000 sq ft of activated lifestyle-led retail, leisure and amenity space, 625,000 sq ft of office space and 2 acres of public realm. The scheme has delivered substantial areas of new high quality public realm with a carefully curated landscape and arts strategy.

SH Reading Master LLP is now seeking to bring forward the Phase 3 part of the hybrid consent (Ref: 192032), which sits to the west of Phase 2 and is bounded by Greyfriars Road, Garrard Street and Station Hill. Phase 3 benefits from outline planning permission and SH Reading Master LLP is looking forward to developing proposals for this land and engaging with the Council in 2025 and submitting Reserved Matters applications. Phase 3 will be the final part of transformational redevelopment that is known as Station Hill.



Representations on draft updated Local Plan

General Comments

We support the renewed vision of the draft Local Plan that continues to encourage regeneration and deliver the uses and needs of Reading, particularly the Town Centre. We note that the revised NPPF was adopted in December 2024 and sets out increased housing targets for Reading. It also further emphasises the importance of optimising the use of brownfield land for new homes. It is noted and supported that the draft updated Local Plan seeks to update the housing target to align with the new standard methodology for housing need published in December 2024, which highlights a need for 825 homes per year.

It should be noted that the outline planning consent at Station Hill allows for up to 750 new residential homes to be delivered within Phase 3, and we look forward to bringing forward the residential Reserved Matters applications in 2025. It is important that the draft Site Allocation fully allows for up to 750 residential to be delivered.

We further emphasise that any new requirements introduced by the updated Local Plan should apply only to new full applications submitted after the plan's adoption and should not be retrospectively applied to Reserved Matters Applications being brought forward under existing outline consents. This ensures certainty for developments already in progress while maintaining alignment with established planning principles.

We raise comments in relation to specific draft policies below.

Policy EN19 URBAN GREENING FACTOR:

We note the proposed new policy requires development to demonstrate how an appropriate proportion of green cover will be delivered on site through an Urban Greening Factor (UGF) assessment. We support the principle of enhancing urban greening within developments in Reading. The Station Hill development has already adopted many Urban Greening principles. However, the policy should highlight that the requirement applies to new full planning applications only. As explained, Phase 3 of Station Hill benefits from an outline planning consent that includes parameter plans, a Development Specification and a Design Code. These already include the need for generous open space and the landscape design that will be developed in consultation with RBC planning and design officers. It is inappropriate for new policy to be applied to past outline planning consents where a detailed Design Code has already been approved. It is therefore requested that it is clearly stated that the requirement for a UGF assessment applies only to new full or outline planning applications (and not apply retrospectively to RMAs).

Policy CC2 SUSTAINABLE DESIGN AND CONSTRUCTION:

Policy CC2 now states that: *'all non-residential developments are required to achieve net-zero development 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." Net zero building status must be achieved through the application of the following energy hierarchy:*



- *Minimise and manage operational energy demand through building design, fabric performance and servicing measures;*
- *Use local low carbon energy resources (such as secondary heat) wherever possible to meet residual demands;*
- *Meet remaining residual energy demands by producing, storing and using renewable energy on-site; and*
- *Monitor and report on energy performance'*

The hybrid planning application for Station Hill was extensively and robustly tested by both Reading Borough Council and the applicant during the determination of the application. The associated Section 106 agreement secured the approach to Carbon offsetting and the relevant calculation with a specified formula within the Agreement. The draft policy should be updated to clarify that the requirements will only apply to new detailed planning applications.

Furthermore, Policy CC2 states that: *'The demolition of an existing building should be accompanied by a full justification for demolition and demonstrate how 95% of all construction waste will be diverted away from landfill²³. For non-listed buildings, demolition will 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.'*

The hybrid planning consent secured the principle for demolition. The draft policy text should again confirm that the requirement only applies to new detailed planning applications.

Policy CC7 DESIGN AND THE PUBLIC REALM:

We strongly support Policy CC7 and its emphasis on achieving high-quality design, enhancing physical character, fostering a sense of community, and addressing environmental issues such as climate change. The comprehensive framework outlined—covering context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan—is fundamental to delivering developments that sustainable. Station Hill Reading exemplifies these principles embedded within Policy CC7, as demonstrated through its phased development approach. Phases 1 and 2 have already delivered transformative results, creating a vibrant, high-quality urban environment that aligns with the policy's objectives:

- **Context and Identity:** Station Hill integrates into Reading's urban fabric, respecting its cultural and historical context while providing distinctive architecture and public spaces that reflect contemporary and future ways of living.
- **Built Form and Movement:** The development features compact, walkable streets and spaces, prioritising pedestrian and public transport accessibility. These design choices promote safety, ease of navigation, and inclusivity for all users.
- **Nature and Public Spaces:** Station Hill incorporates significant green spaces, landscaping, and tree planting that enhances biodiversity and climate resilience, creating multifunctional areas for relaxation, interaction, and environmental sustainability.
- **Uses and Homes:** The mix of residential, retail, office, and leisure uses delivers a thriving, inclusive community, with a range of housing options to meet diverse needs.



- **Resources and Lifespan:** With sustainability at its core, Station Hill leverages modern technologies and high-quality materials to ensure energy efficiency, resilience, and adaptability over time.

The delivery of these policy objectives is already evident in the completed and ongoing works at Station Hill, making it a prime example of how high-quality design and public realm improvements can be achieved in Reading. As such, Station Hill not only aligns with, but actively champions, the vision set out in Policy CC7.

We welcome the continued emphasis on high-quality design and public realm improvements through this policy and look forward to ensuring Station Hill remains a benchmark for urban regeneration in Reading.

Policy CC10 HEALTH IMPACT ASSESSMENT:

We acknowledge the importance of ensuring developments contribute positively to health and wellbeing, and we support the principle of Policy CC10. Station Hill was subject to an outline planning consent where health-related impacts were considered as part of the Environmental Statement (ES) and supporting documents approved with the application. This assessment provided a robust review of potential health-related impacts and their mitigation, proportionate to the scale and nature of the development. Requiring a separate Health Impact Assessment (HIA) for Reserved Matters Applications would therefore be unnecessary and result in duplication of work. It is therefore requested that this new policy includes supplementary text that highlights the requirement is needed for new full detailed planning applications only.

To ensure clarity and consistency, we request that Policy CC10 explicitly states that its requirements will not apply to Reserved Matters Applications proceeding under an existing outline consent where health considerations have already been assessed and agreed.

Policy EN12 BIODIVERSITY:

We acknowledge the importance of enhancing biodiversity and support measures that aim to achieve a 10% Biodiversity Net Gain (BNG) in line with the principles of sustainable development. However, the policy needs to be implemented in accordance with existing legislation and does not impose additional requirements.

The Biodiversity Gain Requirements (Exemptions) Regulations 2024, as referenced in the draft policy, explicitly states that RMAs under an existing outline planning consent are exempt from the mandatory requirement to achieve a 10% BNG. This exemption reflects the legislative recognition that RMAs are bound by the parameters and conditions of their outline consent, which could not have anticipated the introduction of these new requirements.

We therefore request that the policy text is revised to explicitly state that RMAs submitted pursuant to an outline consent granted before the mandatory BNG requirements came into effect are exempt. This will ensure consistency with the Biodiversity Gain Requirements (Exemptions) Regulations 2024 and avoid unnecessary challenges during the determination of RMAs.



Policy EN14 TREES, HEDGES AND WOODLANDS:

We support the principle of increasing tree coverage across Reading and welcome the principle of protecting existing vegetation, enhancing biodiversity, and improving canopy cover to achieve environmental, social, and climate-related benefits. However, this policy requirement does need to be considered and balanced against other policy requirements, such as public realm. To ensure the policy is effective and flexible for urban developments, we request that the policy includes supplementary text which highlights that these urban greening initiatives are considered in the context of the wider public realm and benefits of a development. The priorities should be delivered unless there are clear public benefits that justify an alternative approach.

We support the policy's flexibility to integrating tree planting within the public realm improvements and street frontages, where it can contribute meaningfully to urban design, placemaking, and the long-term sustainability of the area. It is vital, however, to ensure that increased tree coverage works cohesively with the public realm, avoiding conflicts with other policy objectives relating to accessibility, active use of spaces, and the maintenance of a high-quality urban environment.

Station Hill exemplifies these principles in practice. Through Phases 1 and 2, we have delivered a significant net gain in tree coverage, contributing meaningfully to the enhancement of Reading's urban environment:

- Phase 1: Delivered a net gain of trees, focused on creating tree-lined streets and improving biodiversity; and
- Phase 2: Further delivered a net gain of trees, including high-quality public realm enhancements and landscaping that aligns with the objectives of Policy EN14.

These contributions have not only increased canopy coverage but also created vibrant, multifunctional spaces that integrate green infrastructure with the built environment. Station Hill demonstrates how developments can achieve biodiversity enhancements and environmental resilience while complementing high-quality design and public realm improvements.

Policy H1 PROVISION OF HOUSING:

We support the principle of Policy H1, which seeks to address Reading's urgent housing needs through the provision of a significant number of new homes during the plan period. The proposed target of 15,847 homes (equating to 825 homes per annum) reflects both the scale of local housing need and the borough's capacity to deliver.

Phase 3 of the Station Hill development has the potential to deliver a substantial number of new homes, making a meaningful contribution to the borough's housing target. This phase will build upon the success of Phases 1 and 2, which have already delivered high-quality housing, commercial space, and public realm improvements in the heart of Reading.

The applicant looks forward to engaging constructively with the Council in 2025 as plans for Phase 3 progress. This will allow us to collaborate on ensuring that the homes delivered align with the borough's strategic priorities, including affordability, sustainability, and high design standards.



Policy H2 DENSITY AND MIX:

We support the overarching approach of Policy H2, particularly the emphasis on achieving minimum density levels for residential developments, as this aligns with the objective of making efficient use of land. Station Hill, located within the central area, is well-suited to meeting and exceeding the minimum density requirement of 260 dwellings per hectare, given its urban character and exceptional accessibility by public transport, walking, and cycling.

We acknowledge and appreciate that the policy explicitly sets these densities as minimums, ensuring flexibility to deliver higher densities where appropriate. The policy does not place an upper limit on density, which is crucial to ensure that highly accessible brownfield land, such as Station Hill, can be optimised for housing in a design-led approach to density and housing delivery.

Policy H5 STANDARDS FOR NEW HOUSING:

We acknowledge and support the intent of Policy H5 to ensure high standards for new housing across Reading Borough, particularly in relation to sustainability, energy performance, and accessibility.

Phase 3 of the Station Hill development benefits from an outline consent that included an approved energy framework that aligned with the sustainability objectives of the adopted Local Plan. The energy framework will ensure that the Phase 3 development will deliver sustainable housing aligned with high environmental standards. This includes commitments to energy efficiency, renewable energy integration, and carbon reduction measures, consistent with the strategic objectives outlined in Policy H5. It is therefore requested that Policy H5 is updated to include supplementary text that confirms the new policy requirement will only be applied to new detailed planning applications.

Policy CC11c STATION HILL & FRIARS WALK (Site Allocation)

We acknowledge that the Site Allocation CR11c, Station Hill & Friars Walk, has been updated to reflect the development specification for Phase 3. This is welcomed. The Site Allocation now refers to the overall indicative potential of 490-934 dwellings, 64,000-95,000 sq m of office space, and 3,900-5,900 sq m of retail and leisure space. These adjustments align with the evolving plans for Station Hill and we broadly support the updated Site Allocation as the figures are stated as being indicative only and not a cap on development that can be brought forward. We would request that the site allocation boundaries are made clearer with defined plans and maps.

Conclusion

SH Reading Master LLP continues to welcome the opportunity to provide comments on the Pre-Submission Draft Regulation 19 Local Plan Partial Update. We trust the above comments are helpful in informing the next stage of the Local Plan Partial Update process.

We wish to reiterate the importance of ensuring that any new requirements introduced through the updated Local Plan apply only to new full applications submitted after the plan's adoption and are not applied to Reserved Matters Applications being progressed under existing outline consents. The distinction is crucial to provide clarity and certainty for developments already in progress while supporting the objectives of the updated Local Plan.



We welcome the continued engagement with the council as it progresses the review of the Local Plan.

Yours faithfully

DP9 Ltd.

DP9 Ltd.

Sharpe, John

Reading Borough Local Plan — notes toward Reading FoE response v1 on

Local Plan Pre-Submission Draft Partial Update, November 2024 (Regulation 19)

Comments from John Sharpe

Policies:

CC2: SUSTAINABLE DESIGN AND CONSTRUCTION

1/. Introduction:

RBC documents are at <http://www.reading.gov.uk/localplanupdate>

Draft of RBC documents to be submitted to Inspector are near the bottom of that page.

Scope of representations at this stage:

Note particularly that right at the bottom of RBC page it says “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). ~~But that should have said Paragraph 36 I think.~~”

For a more user friendly explanation see Wokingham’s note:

<https://www.wokingham.gov.uk/sites/wokingham/files/2024-09/LPU%20Proposed%20Submission%20Plan%20Guidance%20for%20making%20representations.pdf>

Consultation closes 18th December. Suggest we respond by emailing a .pdf to planningpolicy@reading.gov.uk

2/. Review of RBC Sustainability Appraisal document — points to note:

RBC Climate Emergency Strategy updated since appraisal!

RBC Transport strategy 2024 — proposes only to about halve CO2 emissions

Housing strategy: “using funds raised through the zero carbon approach in policy H5, it will be used to support the retrofit of carbon reduction measures to existing housing”

Census results — growth impacts on water and energy over time.

Housing numbers:

878 homes per year up to 2041, up from 689. Future NPPF will increase to 1023 if it goes ahead. But note Wokingham and parts of W Berks house people who work, shop, and enjoy recreation in Reading?

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Reading's Housing Numbers Assessment concluded that Reading's locally-based need housing figure for the plan period is 735 dwellings per annum. Is 'Standard Method' useful?

What is 'sustainable housing'?

5.16 The Council has decided to incorporate the screening stage of the Habitat Regulations Assessment process within the sustainability appraisal.

Appendix for significant effects

Policies vs Objectives: Objectives (2024) are Page 20.

Do proposals accord with NPPE?

EN12 — potential negatives on ob 13 (housing targets) especially if 20% target for on-site improvement. **But it can be off-site!!!**

3/- Review of Partial Update: some cut'n-paste from "Marked up copy" — some points to consider responding to.

Trying to identify proposed policies worth looking at in more detail

2.2.2 The objectives for the Local Plan are as follows:

1. Respond to the climate emergency by contributing to achieving a net zero carbon Reading by 2030;

Figure 3.1 sets out the overall spatial context for the area, including major areas of development outside Reading's boundaries. Of particular significance for Reading are the strategic development locations (SDLs) in Wokingham due to their proximity to our boundary, including the South of the M4 SDL (much of which has already been completed and is not therefore shown), and the proposed Loddon Valley Garden Village SDL comprising phased delivery of 3,930 homes that forms part of Wokingham's Proposed Submission Local Plan Update. Developments on this scale will be expected to deliver a significant improvement in infrastructure, and transport links into Reading in particular by public transport will be of vital importance

4.1.5 refers to LETI Climate Emergency Retrofit Guide - which is very good advice. To practically assist property owners, it would be useful if there was a commitment to helping residents to adopt the principles in this guide, through the development of a local advice service like Carbon Co-op in Manchester or Cosy Homes in Oxfordshire.

Policies:

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

CC2: SUSTAINABLE DESIGN AND CONSTRUCTION

(Non-residential not BREEAM) embodied carbon?

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~~Allow demolition and rebuild if 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.~~

Timing of renewable energy infrastructure as option?
performance of new-build homes in terms of emissions are set out in policy H5 on housing standards.

CC3: ADAPTATION TO CLIMATE CHANGE

"All development shall must minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change."

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It would be useful to explicitly restrict the conversion of gardens to car parking, without adequate provision for on site drainage. In established areas such as East Reading increase runoff is due largely to gardens being paved over for car parking not new development.

~~CC4: DECENTRALISED ENERGY – Electricity Supply?~~

~~Data Centres? CHP 4.1.15 etc.?~~

~~CC5: WASTE MINIMISATION AND STORAGE~~

~~CC6: ACCESSIBILITY AND THE INTENSITY OF DEVELOPMENT~~

~~CC7: DESIGN AND THE PUBLIC REALM~~

"Built Form – exhibits a coherent pattern of development that is compact and walkable, accessible by public transport, services and facilities with distinctive and legible streets and other spaces that are easy to navigate, safe and accessible."

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To be sound this paragraph should also include cycling explicitly

"Nature – enhances and optimises nature by integrating existing and new natural features into a multifunctional network to support quality of place, biodiversity, water management and climate change mitigation. Schemes should retain existing trees and aim to establish new"

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To be realistic plans should include a specific requirement for post development i.e. define how many trees are surviving in good condition after 5 years not just how many are planted as many are poorly planted, not watered and die in early years as a result.

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EN7: LOCAL GREEN SPACE AND PUBLIC OPEN SPACE

The plan is unsound because it fails to include the Fobney Meadow / Fobney Marsh area as a Local Green Space. This area is often flooded and as a result becomes a hot spot within Berkshire for bird life, especially during the autumn and winter months. The photograph below shows the list of birds recorded at this location during November 2024.

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Figure 1 View over Fobney Marsh



Figure 2 Indication of proposed extent of the Local Green Space

Reading Old Cemetery

The plan is unsound as it fails to offer the protection offered by policy **EN7: LOCAL GREEN SPACE AND PUBLIC OPEN SPACE** to Reading Old Cemetery as a Public Open Space. Other church yards in Reading such as St Giles and St Lawrence are included but it seems an omission that the Reading Old Cemetery is not included. The land lies adjacent to one of the most densely populated areas of Reading, Newtown and between two roads that are designated as part of an Air Quality Management Action area. It offers a welcome respite to the urban environment and is supported by friends of Reading Old Cemetery who manage part of it as chalk grassland habitat.

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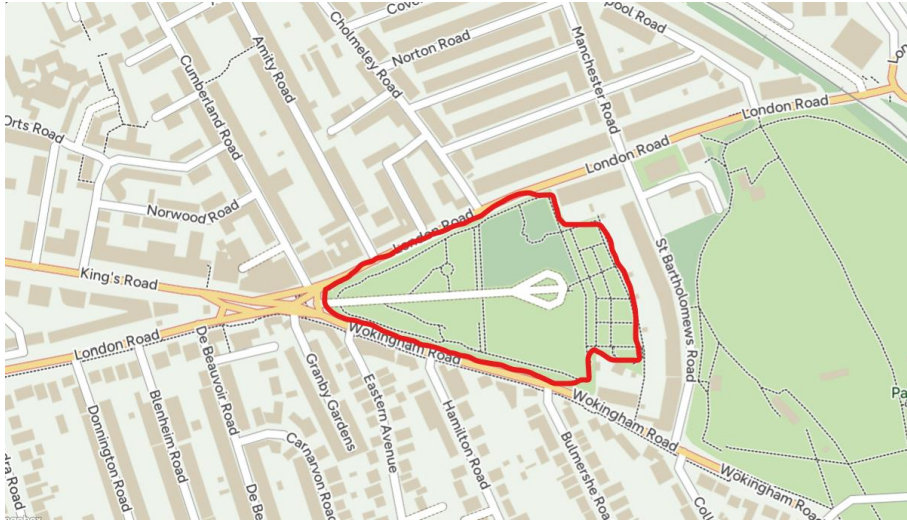


Figure 3 Map showing location of Reading Old Cemetery Public Open Space

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EN12: BIODIVERSITY (includes Green Network and BDN)

B Opp. Areas gone?

EN15: AIR QUALITY

There is a requirement for the UK to attain a national exposure target for PM_{2.5} of 15% reduction between 2010 and 2020.

"4.2.91 Other particles include PM_{2.5}, and, again there is no 'safe' levels of these particles, although there are World Health Organisation guideline levels. There is a requirement for the UK to attain a national exposure target for PM_{2.5} of 15% reduction between 2010 and 2020. The Council is monitoring these levels,"

This policy fails the soundness test as the target for reduction is in the past. It should refer to a target for reduction in the future. DEFRA provides the following guidance:

Interim Planning Guidance on the consideration of the Environment Act PM_{2.5} targets in planning decisions

The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 set two new targets for fine particulate matter (PM_{2.5}):

- A maximum annual mean concentration target of 10µg/m³ to be achieved by 2040 (the AMCT); and
- A population exposure reduction target of 35% compared to 2018 to be achieved by 2040 (the PERT).

EN16: POLLUTION AND WATER RESOURCES

EN18: FLOODING AND SUSTAINABLE DRAINAGE SYSTEMS

EN19: URBAN GREENING FACTOR

~~4/. Notes on (current) NPPF policies to compare Draft with:
https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF_December_2023.pdf~~

~~NPPF paragraph 20 requires plans to make sufficient provision for infrastructure for transport. Paragraph 73 requires new developments to be supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Paragraph 152 says planning should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions.~~

~~NPPF Paragraph 152 says planning should help to: shape places in ways that contribute to radical reduction~~

~~Chapter 14. Meeting the challenge of climate change, flooding and coastal change
Paras 157 to 164 etc.~~

~~Chapter 15. Conserving and enhancing the natural environment~~

~~5/. Start at working on responses—headlines:
Some areas to look at from environmental perspective. Slight re-working of 3/. Above for addition to 11th December meeting agenda,~~

~~Policy CC2 Sust. Des. & Constr.—abandons BREEAM—Good!]~~

~~CC3—Adaptation—generally good~~

~~CC4 Decentralised Energy—good? Rowing back on previous—probably unrealistic—policies for CHP~~

~~“must include decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable”~~

~~—Viability test? Still supports CHP—but where does heat come from?~~

H5: STANDARDS FOR NEW HOUSING (Strategic policy)

“New build housing should be built to the following standards, unless it can be clearly demonstrated that this would render a development unviable:”

~~The a~~Allowable heating demand is too high – site average of 15-20 kWh/m²~~Δ2-2~~ PassivHaus is 15 kWh/m²

The LETI Climate Emergency Retrofit Guide suggests that the average Space heating demand (kWh/m2/yr) for 2021 allowing for the performance gap is 85. The space heating demand in order to fit the “realistic” criteria should allow for the widely recognised “performance” gap between design and delivery of buildings.

The PassivHaus design and testing approach has been shown to reliably deliver measured in use outcomes that match those predicted by the design. Developers should either use the Passivhaus methodology or explain how the methodology that they propose to use will reliably deliver in use energy demands that their design predicts.

~~“On-site renewable energy generation to match total energy use over the course of a year – Solar PV”~~

~~Not technically possible for dense sites. Still a viability test!~~

~~“offsetting”? “using funds raised through the zero-carbon approach in policy H5, it will be used to support the retrofit of carbon reduction measures to existing housing”~~ To what extent? How calculated?

Policy EN12

? Nature impact of high housing targets and whether Biodiversity Net Gain should be 10% or 20% ? Preferred option is 10% Biodiversity Net Gain (BNG) requirement with off-site compensation mechanism. Less impact on housing supply targets than 20% without off-site

Policy TR1: Transport Strategy:

But transport strategy 2023 version (Section 9.3) the CO2 target was to less than halve emissions to 54 kt in 2040. So still substantial.
East Rdg MRT seems to still be there.

Missing point? Don't think there is anything on reinforcing electricity supplies anywhere.

End 12th December revision

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Sims, Hazel

(Response from webform)

Title: Mrs

First name: Hazel

Last name: Sims

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 tilehurst

Do you consider the Local Plan is legally compliant?:

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: No

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.

The LGS status should be given to all of the land as requested and not just the small change to site WR3s. All of the space meets the LGS criteria (in reasonably close proximity to the community it serves; is demonstrably special to a local community and holds a particular local significance because of the richness of its wildlife; and is local in character and is not an extensive tract of land)

It is unsound of RBC Officers to take the view of the landlord TPLC and their agents who want to develop the land when LGS is about allowing local communities to protect green space that's important to them

It ignores all the evidence submitted of the variety of wildlife found across all of the land (over a 100 different species) and expert opinions from CPRE England, BBOWT, Badgers Trust and Rural England

All of the land is vital to support the wildlife for hunting, breeding, foraging and refuge so it's flawed environmental reasoning to suggest that small areas of land of 'greatest importance for wildlife' would not be adversely affected by development of broader hunting, foraging grounds. Some species - bats and birds - identified predominantly in skies around the builders yard and on Armour Hill

There is also a stark contrast between what is expected to be provided for granting LGS designation to these sites compared to that of previous designations (like the Victoria Rec and the allotments) and the new additional proposed LGS in this partial plan update of the Ibis Sports Club (a private club with playing fields adjacent to RBC owned Rivermead centre)

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: Hazel Sims

Rejwerska, Marcelina

From: Hazel Sims
Sent: 18 December 2024 09:30
To: Planning Policy
Subject: Re partial update to local plan Kentwood Tilehurst

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 Sirs

In response to questions 15 to 75 (regulation 19) I believe that the councils designation of only part of the land at Kentwood Hill WR3s and Armour Hill WR3t as local green space is unsound. This land, in my view, should ALL be granted local green space status as it all satisfies the criteria.

I hope you can also reach thus conclusion for the sake of the wildlife in this area

Many thanks

Hazel Sims

Solly, George and Katherine

Rejwerska, Marcelina

From: George Solly
Sent: 12 December 2024 15:47
To: Planning Policy
Cc: Globe Tilehurst
Subject: Draft Local Plan ref: Kentwood Hill / Armour Hill

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 Planners,

We would like to add these comments to our previous submission via the official form regarding Kentwood Hill /Armour Hill in Tilehurst:

The area under discussion is a wildlife refuge which contains important animal, invertebrate and environmental diversity;

It provides a valuable wildlife corridor between it and nearby public parks (Arthur Newbury & McIlroy), gardens, allotments in Armour Hill and Oaktree Road) and open spaces (Tilehurst Recreation Ground);

To build on any part of the 'brown or grey" part of the site would be increase the possibility of flooding to housing beneath it on Kentwood Hill due to its considerable elevation and steepness. Additionally, there has been considerable local

subsidence in Armour Hill, Armour Hill junction with Westwood Rd and Oaktree Road, Dudley Close / Armour Hill and Westwood Road.

In summary, any building on or change to this site would be unsound and detrimental to the local community.

Yours sincerely,
Kathryn & George Solly

Sorbon Estates Ltd

Representations to the Reading Borough Local Plan Partial Update

**Regulation 19 (Pre-Submission) Consultation
(November 2024)**

Sorbon Estates Ltd

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Executive Summary

- i. These representations have been prepared on behalf of Sorbon Estates Ltd in relation to the current Regulation 19 Pre-Submission consultation for the Reading Borough Local Plan Partial Update (LPPU).
- ii. Sorbon Estates Ltd are in control of Reading Link Retail Park ('the Site') which is allocated for residential development under draft LPPU Policy SR14g (Reading Link Retail Park, Rose Kiln Lane). The Site has previously been promoted for residential development, on behalf of Sorbon Estates Ltd, in response to the Call or Sites (June 2023) and LPPU Regulation 18 consultation (January 2024).
- iii. Our response to the current Regulation 19 Pre-Submission consultation is based on details contained within previous representations and seeks to assist in informing the final stages of the LPPU.
- iv. It is welcomed that the Reading Link Retail Park is allocated for residential development under Policy SR14g of the draft LPPU. The Site comprises brownfield land in a sustainable location which provides an opportunity for an appropriate high-quality, landscape-led and attractive gateway development to contribute towards the aims and aspirations of the LPPU. The accompanying Vision Document (Appendix XX) with Illustrative Masterplan demonstrates how development could be accommodated on the site and how the proposed allocation could be delivered.
- v. Notwithstanding this, a number of changes are recommended to draft LPPU Policy SR14g and other draft LPPU policies in order to ensure the soundness of the Plan, with reference to paragraph 35 of the NPPF (2023).

1. Introduction to Representations

1.1. Introduction

- 1.1.1. These representations have been prepared on behalf of Sorbon Estates Ltd in response to the current Regulation 19 Pre-Submission consultation for the Reading Borough Local Plan Partial Update (LPPU).
- 1.1.2. This Statement sets out our response to the consultation focused on relevant draft policies and the supporting evidence base.

1.2. Context

- 1.2.1. Sorbon Estates Ltd are in control of Reading Link Retail Park ('the Site') which is allocated for residential development under draft LPPU Policy SR14g (Reading Link Retail Park, Rose Kiln Lane).
- 1.2.2. The Site has previously been promoted for residential development, on behalf of Sorbon Estates Ltd, in response to the Call or Sites (June 2023) and LPPU Regulation 18 consultation (January 2024).
- 1.2.3. Our response to the current Regulation 19 Pre-Submission consultation is based on details contained within previous representations and seeks to assist in informing the final stages of the LPPU.

1.3. Report Structure

- 1.3.1. This report is structured as follows based on relevant draft policies contained within the Regulation 19 Pre-Submission consultation document (November 2024) and the supporting evidence base.
- 1.3.2. Responses are set out under each relevant draft policy with proposed changes set out as necessary to ensure the soundness of the Plan based on paragraph 35 of the National Planning Policy Framework (NPPF) (2023). It is noted that paragraph 35 of the NPPF (2023) is unchanged in the new NPPF (December 2024) (paragraph 36).
 - Policy H1: Provision of Housing;
 - Policy H2: Density and Mix;
 - Policy H3: Affordable Housing;
 - Policy RL2: Scale and Location of Retail, Leisure and Culture Development; and
 - Policy SR4: Other Sites for Development in South Reading.

2. Policy H1 (Provision of Housing)

2.1. Introduction

- 2.1.1. Policy H1 states that provision will be made for at least 14,850 new homes (825 homes per annum) during the Plan period 2023 to 2041. The supporting text to Policy H1 explains that the proposed housing requirement has been identified having regard to two different assessments of future housing need – 878 homes per year based on the standard methodology (including 35% urban uplift) or 735 homes per year based on a local Housing Needs Assessment (HNA) (2024).

2.2. Response

- 2.2.1. The NPPF (2023) is clear that the purpose of the planning system is to contribute towards the achievement of sustainable development (paragraph 7), including through the provision of a sufficient number and range of new homes (paragraph 8). Paragraph 60 outlines the Government's objective to significantly boost the supply of homes.
- 2.2.2. To achieve this objective, Paragraph 61 of the NPPF (2023) is clear that, *'To determine the **minimum number of homes needed**, strategic policies should be informed by a local housing need assessment, **conducted using the standard method** in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area'* [our emphasis].
- 2.2.3. Paragraph 61 of the NPPF (2023) adds that, *'There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need...'*
- 2.2.4. The supporting text to Policy H1 and the LPPU evidence seek to explain that there are exceptional circumstances (relating to demographic issues and the required urban uplift) which justify using the Housing Needs Assessment (HNA) (2024) as an alternative approach to the use of the standard method.
- 2.2.5. The Housing Provision Background Paper (November 2024) (para 3.6) explains that the current standard method is 'flawed' with regards to demographic issues as it is based on 2014-based household projections. The Council consider that this is a 'sufficiently strong argument on its own' for an alternative approach (para 3.7). Notably however, the Background Paper (November 2024) (para 3.5) adds that the 2014-based household projections are a 'particularly significant underestimate for Reading' and the HNA (2024) (para 5) states that the Standard Method (if the urban uplift is excluded) is therefore an 'under-estimate' of local housing need on this basis.

- 2.2.6. The draft LPPU and Housing Provision Background Paper (November 2024) argue that the urban uplift is 'inappropriate' to apply in Reading based on its geographical area and existing population. Whilst it is acknowledged that the urban uplift does not take into account specific local needs and characteristics, the NPPF (2023) (paragraph 62 / footnote 27) and Planning Practice Guidance (PPG) are clear that the overall purpose of the urban uplift is rather to prioritise the use of brownfield sites within urban centres and to promote the most efficient use of land (PPG Paragraph: 035 Reference ID: 2a-035-20201216). The size and population of Reading are therefore not considered to be reasons for not applying the urban uplift and the efficient use of brownfield land; and to do so would undermine the Government's emphasis (through applying the urban uplift) of making efficient use of brownfield land.
- 2.2.7. Given the draft LPPU (para 4.4.1) acknowledges the 'pressing need' for 'strong delivery of new housing' and seeks to meet objectives to 'strengthen the role of Reading' and 'ensure that as many new homes as possible are delivered' (Objectives 2 and 3), it is considered that the Council should aim to deliver a housing requirement that matches or exceeds the requirement provided by the standard method. To deliver less than the standard methodology of 878 homes per annum, as proposed by Policy H1, conflicts with these objectives.
- 2.2.8. Furthermore, it is notable that the new NPPF (December 2024) and accompanying new standard method include a further strengthening of Government support for overall housing delivery and the development of brownfield land. The proposed standard method would also further increase local housing needs in Reading to 1,028 homes per annum. Whilst the draft LPPU is intended to be examined under the current NPPF (2023), based on the transitional arrangements which were set out in the draft NPPF (July 2024), the Government's objectives and focus for the planning system moving forwards are clear: that the Council must plan positively to accommodate a significant increase in housing.

2.3. Summary

With reference to paragraph 35 of the NPPF 2023, Policy H1 as currently worded and evidence based does not meet the tests of soundness.

Accordingly, in order to ensure the soundness of the Plan, it is important that the Council identifies a housing requirement that matches or exceeds the requirement provided by the standard method.

3. Policy H2 (Density and Mix)

3.1. Introduction

- 3.1.1. Draft Policy H2 requires residential developments to meet minimum density targets based on location, including: 260 dwellings per hectare (dph) for town centre sites, 100dph for urban sites and 42dph for suburban sites, subject to exceptions. The policy also requires that developments of 10 or more dwellings in district/local centres, outside the central area, provide a housing mix that includes at least 20% three-bedroom or larger homes.

3.2. Response

Density

- 3.2.1. The increase in minimum density targets for urban sites – from an indicative range of 60-120 dph in the adopted Local Plan (2019) to a minimum density of 100dph in the draft LPPU – is welcomed and aligns with the overall aims of the NPPF (2023).
- 3.2.2. It is noted however that draft Policy H2 allows for a number of exceptions to meeting the minimum density targets, including where development would cause a ‘detrimental effect’ on important landscapes or ‘prevent’ the minimum proportion of 3-bedroom homes being achieved.
- 3.2.3. The NPPF (2023) (paragraphs 123, 129 and 135) states that planning policies should ‘*promote an effective use of land in meeting the need for homes*’ and that development should optimise the use of land to meet identified housing needs, in particular town centres and other locations that are well served by public transport. Paragraph 129 and 130 further encourages the use of ‘minimum’ density standards and ‘significant uplifts’, unless ‘*the resulting built form would be wholly out of character with the existing area*’.
- 3.2.4. Whilst the NPPF (2023) is therefore clear that other factors should be taken into consideration, the overall aims are to optimise the use of land and to support increased housing delivery including through the use of brownfield land. This has been further strengthened in the new NPPF (2024). This is also reflected in the draft LPPU objectives, which include objective 2 to, ‘*Make the most efficient use of Reading’s limited land, particularly previously developed land, to ensure that as many new homes as possible are delivered to meet identified needs...*’.
- 3.2.5. The exceptions detailed in the policy therefore have the potential to conflict with the wider stated objectives of the Plan as well as the overall aims of national policy. Further, many of the matters covered by the exceptions are dealt with under other policies in the LPPU (e.g. relating to housing mix, heritage, open space requirements etc) and should be considered as part of the overall planning balance in the consideration of planning applications.
- 3.2.6. On this basis, and to support meeting the Government’s overall aims and the LPPU objectives, it is recommended that the emphasis of draft Policy H2 should be amended and the exceptions deleted.

- 3.2.7. It is noted that the supporting text to Policy H2 (paragraph 4.4.10) states that *‘Even above the minimum density, there is still significant scope for a range of densities.’*
- 3.2.8. This flexibility is welcomed and aligns with our view that the appropriate density should take into account site-specific circumstances and the opportunities and benefits of development, based on the minimum density targets. Each site will have unique characteristics, such as its location and accessibility to public transport, which will influence the appropriate density. It is important therefore that the minimum density requirements are applied as a guide with the precise density determined through detailed design and technical assessment. The acknowledgement for development to ‘significantly exceed’ these requirements should also be included in the policy wording itself.

Mix

- 3.2.9. Part 2 of draft Policy H2 states that, *‘Wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.5, and in particular should maximise the provision of family homes of three or more bedrooms.’* It is assumed that the draft policy wording is incorrectly referring to Figure 4.4 (not 4.5) which sets out ‘Estimated size of accommodation type required in Reading’ based on the Reading Housing Needs Assessment (HNA) (2024). Notably Figure 4.4 sets out a need for 65.6% 3-bed market homes and a need for 44.9% 3-bed homes overall.
- 3.2.10. However, draft Policy H2 continues to state that, *‘As a minimum, new development for 10 or more dwellings outside the central area will comply with the following, unless it can be clearly demonstrated that this would render a development unviable:*
- *In district and local centres, at least 20% of dwellings will be of three bedrooms or more;*
 - *In other locations, at least 67% of dwellings will be of three bedrooms or more...*
- 3.2.11. The specific requirement for major development outside the central area and district / local centres to provide at least 67% 3-bedroom homes appears to be at odds with the overall identified need for 44.9% 3-bed homes across the borough. Whilst it is acknowledged that different areas of the borough are identified to deliver different proportions of 3-bedroom homes to meet overall needs; it is not clear how the proposed breakdown between the central area, district / local centres and other areas has been derived. The breakdown of different proportions for these areas also fails to acknowledge highly accessible urban sites on the edge of the central area, such as Reading Link Retail Park, which are more akin to town centre sites but fall within the broad definition of ‘other locations’ identified to deliver a significant proportion of 3-bed homes.
- 3.2.12. Whilst it is envisaged that development at Reading Link Retail Park can accommodate a mix of homes, including 3 or more bedrooms, it is considered that 67% 3-bed or more homes for an apartment-led scheme in this highly accessible urban location would not be appropriate.
- 3.2.13. Further, whilst it is acknowledged that the HNA (2024) (Figure 6) highlights an overall need for 3-bed units, the borough’s overall housing needs are diverse and there are a number of more detailed factors arising from the HNA which should also be taken into account.

- 3.2.14. Notably, the HNA (2024) (Figure 6) shows that the overall mix of affordable housing needed is focused more towards smaller 1-bed units. In addition, the HNA (2024) (Figure 29) projects significant increases in smaller households, including both 'single person households' and 'couples without dependent children', which are each projected to increase by over 4,000 during the Plan period and to become the largest household groups in the borough. The HNA (2024) (Figure 51) states that the majority (62%) of dwellings occupied by households aged 75+ are 3-bedrooms or more. It is clear therefore that housing needs in the borough are more nuanced and are likely to change during the Plan period and across the borough, based on demographic changes and household formation for instance.
- 3.2.15. It is important that specific mix requirements are therefore not strictly applied and that the LPPU is sufficiently flexible to take into account site-specific circumstances, viability considerations and changing needs, particularly in light of the borough's overall increasing housing needs.
- 3.2.16. The LPPU should also recognise all forms of housing provision which can contribute to 'family' needs, including for instance the contribution of larger 2-bed units which can provide for families of up to 4 people and be of a similar size to 3-bed units, contributing to the borough's housing needs in a way the policy does not fully recognise. Indeed it is notable that the minimum gross internal floor areas for 2-bed 4-person dwellings (70sqm) and for 3-bed 4-person dwellings (74sqm) are very similar based on nationally described space standards (NDSS).
- 3.2.17. Accordingly it is recommended that reference to specific mix requirements is deleted from Policy H2.

3.3. Summary

With reference to paragraph 35 of the NPPF 2023, Policy H2 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy H2 in order to ensure the soundness of the Plan.

"1. Density

Residential development will be expected to achieve at least the following minimum densities:

- *Town centre sites: 260 dwellings per hectare*
- *Urban sites: 100 dwellings per hectare*
- *Suburban sites: 42 dwellings per hectare.*

Exceptions to the minimum densities will apply where achieving that density would:

- ~~*Cause unacceptable harm to a designated heritage asset or its setting;*~~
- ~~*Cause a detrimental effect on important landscapes;*~~
- ~~*Create unacceptable impacts on amenity of existing or new residents;*~~
- ~~*Prevent an appropriate conversion of an existing building or buildings;*~~
- ~~*Prevent policy requirements on the minimum proportion of family homes of three or more bedrooms from being achieved; or*~~
- ~~*Prevent policy requirements on the provision of open space or other necessary on-site facilities from being achieved.*~~

~~Subject to the above, the appropriate density of residential development will be informed by:~~ **The appropriate density of residential development will be informed by:**

- ~~the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;~~ **the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;**
- ~~its current and future level of accessibility by walking, cycling and public transport;~~ **its current and future level of accessibility by walking, cycling and public transport;**
- ~~the need to achieve high quality design;~~ **the need to achieve high quality design;**
- ~~the need to maximise the efficiency of land use; and~~ **the need to maximise the efficiency of land use; and**
- ~~the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.~~ **the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.**

~~The circumstances of the site may allow for a density that significantly exceeds the minimum specified.~~ **The circumstances of the site may allow for a density that significantly exceeds the minimum specified.**

2. Mix of sizes

~~Wherever possible, residential development should contribute towards meeting the needs for the a mix of housing based on an up-to-date assessment of local needs and site-specific circumstances set out in figure 4.5, and in particular should maximise the provision of family homes of three or more bedrooms. As a minimum, new development for 10 or more dwellings outside the central area will comply with the following, unless it can be clearly demonstrated that this would render a development unviable:~~ **Wherever possible, residential development should contribute towards meeting the needs for a mix of housing based on an up-to-date assessment of local needs and site-specific circumstances set out in figure 4.5, and in particular should maximise the provision of family homes of three or more bedrooms. As a minimum, new development for 10 or more dwellings outside the central area will comply with the following, unless it can be clearly demonstrated that this would render a development unviable:**

- ~~In district and local centres, at least 20% of dwellings will be of three bedrooms or more;~~ **In district and local centres, at least 20% of dwellings will be of three bedrooms or more;**
- ~~In other locations, at least 67% of dwellings will be of three bedrooms or more.~~ **In other locations, at least 67% of dwellings will be of three bedrooms or more.**

4. Policy H3 (Affordable Housing)

4.1. Introduction

- 4.1.1. Draft Policy H3 requires developments of 10 or more dwellings to provide 30% affordable housing with provision made on site in the first instance. The proposed updates included within the policy include a specific tenure mix (at least 62% Reading Affordable Rent and up to 38% affordable home ownership products, including First Homes) and requirements relating to 'later viability review'.

4.2. Response

- 4.2.1. The tenure requirements set out at part 4 of draft Policy H3 are based on details set out within the Affordable Housing SPD (2021). However, given that affordable housing needs are likely to change across the borough over the course of the Plan period, it will be important that affordable housing is provided to meet local needs at the time of development coming forward and taking into account site-specific circumstances. Accordingly, it is recommended that a specific tenure mix is deleted from Policy H3.

- 4.2.2. Furthermore, as part 4 of the Policy is currently drafted, the LPPU proposes to retain 62% of the affordable housing mix as 'Reading Affordable Rent' (rental levels capped at 70% of market values) and the remaining 38% of 'other affordable ownership' (i.e. shared ownership) incorporating 25% to be secured as 'First Homes'. However by providing First Homes within the 38% 'other affordable ownership', the level of potential shared ownership is effectively reduced to 13% of the overall tenure mix. This is contrary to the approach set out in the PPG, which prioritises the provision of 25% First Homes, and then states that the remaining proportion of affordable provision should be split by a tenure mix identified in the Plan:

*"How should **the remaining** 75% of affordable housing be secured through developer contributions?"*

Once a minimum of 25% First Homes has been accounted for....the remainder of the affordable housing tenures should be delivered in line with the proportions set out in the local plan policy" (paragraph: 015 Reference ID: 70-015-20210524) (our emphasis).

4.3. Summary

With reference to paragraph 35 of the NPPF 2023, Policy H3 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy H3 in order to ensure the soundness of the Plan.

*"...In determining residential applications the site size, suitability, ~~and type~~ **and tenure** of units to be delivered in relation to the current evidence of identified needs will be assessed. ~~The following tenure mix will be sought:~~*

- ~~• At least 62% of the affordable housing to be provided as Reading Affordable Rent;~~*
- ~~• A maximum of 38% of the affordable housing to be provided as affordable home ownership products, which may include First Homes and shared ownership...."~~*

5. Policy RL2: Scale and Location of Retail, Leisure and Culture Development

5.1. Introduction

- 5.1.1. Draft Policy RL2 states that provision will be made for retail, leisure and related facilities in Reading sufficient to maintain the vitality and viability of the network and hierarchy of centres.

5.2. Response

- 5.2.1. It is noted and supported that Policy RL2 is proposed to be updated to remove reference to a specific quantum of additional retail floorspace, based on the Commercial Development Needs Assessment (CDNA) (November 2024).

- 5.2.2. As referred to at LPPU paragraph 4.6.9, the CDNA (2024) highlights an overprovision of comparison goods floorspace with a small positive need for convenience goods floorspace up to 2041.

- 5.2.3. It should be noted that Reading Link Retail Park, whilst currently in retail use is neither allocated nor being promoted for these purposes. The buildings are old and the use is no longer making efficient use of the land. The Site is out of the town centre, where sequentially, retail uses would generally be avoided.

- 5.2.4. Therefore, the retail strategy should continue to focus on allocated retail uses in the town centre and not prejudice the redevelopment of out-of-centre sites. This would be consistent with Paragraph 126 of the NPPF (2023), which requires policies to reflect changes in the demand for land. In addition paragraph 127 of the NPPF (2023) identifies that a positive approach should be taken for proposed alternative uses of land which are currently developed, but not allocated for a specific purpose in the plan. In particular, Paragraph 127 b) identifies that proposals should be supported to:

“use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres and would be compatible with other policies in this Framework”

- 5.2.5. It is considered that given the clear and identified need for more housing in Reading, and the identified overprovision of comparison goods floorspace, Reading Link Retail Park presents a significant opportunity to deliver proposed alternative residential use, in accordance with the provisions of the NPPF (2023) above.

6. Policy SR4 (Other Sites for Development in South Reading)

6.1. Introduction

- 6.1.1. Draft Policy SR4 identifies sites for development in South Reading, including a new allocation at Reading Link Retail Park, Rose Kiln Lane (SR4g).
- 6.1.2. Draft Policy SR4g sets out requirements and principles for development at the Reading Link Retail Park site as follows:

“SR4g READING LINK RETAIL PARK, ROSE KILN LANE

Development for residential.

Development should:

- *Contribute towards an improved Sunday bus service to and from the town centre;*
- *Avoid adverse effects on important trees including those protected by TPO;*
- *Avoid adverse effects on the Major Landscape Feature by ensuring that development does not present a hard urban edge to the Kennet Meadows;*
- *Ensure that development is set back at least 10m from the top of the bank of the adjacent watercourse to provide a buffer for biodiversity;*
- *Take account of potential archaeological significance;*
- *Address any contamination on site;*
- *Address air quality impacts on residential use;*
- *Address noise and light impacts on residential use; and*
- *Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.*

*Site size: 2.12 ha
150-220 dwellings”*

6.2. Response

- 6.2.1. The overall identification of the Reading Link Retail Park site (SR4g) as a proposed site allocation for residential development is supported.
- 6.2.2. The Site is in a highly sustainable location on the edge of the town centre, approximately 650m south of the boundary of the Central Reading Area, within close proximity of public transport nodes and key local services and facilities within the town centre. The Site is not subject to any significant planning policies or constraints to redevelopment.

- 6.2.3. Whilst the Site is currently in retail use, the Site is not protected for these purposes and the buildings occupying the Site are old and no longer making efficient use of the land. The NPPF (2023) (paragraph 127) provides clear support for the principle of redeveloping retail land for homes in areas of high housing demand.
- 6.2.4. The Site therefore has substantial redevelopment potential to bring forward a high-quality and sustainable residential development to provide an attractive gateway to Reading and to contribute towards the aims and aspirations of the LPPU. This aligns with the aims of current and emerging national policy, including the NPPF (2023) and new NPPF (2024), which explicitly encourage the redevelopment and intensification of brownfield land to increase housing supply.
- 6.2.5. Notwithstanding the above, below we set out comments in relation to the detailed requirements of Policy SR4g in order to ensure the soundness of the Plan.

Quantum of development

- 6.2.6. Draft Policy SR4g identifies the site for residential development of '150-220 dwellings'. It is however unclear how this exact range has been calculated and there are different references within the supporting evidence base, e.g. the SA (November 2024) which considers options for development of 100-150 or 200 dwellings at the site.
- 6.2.7. It is noted that draft Policy H2 sets out a 'minimum' density of 100 dwellings per hectare for urban sites, which would equate to a minimum capacity of 212 dwellings at the Site. It is therefore not clear or consistent with how the lowest end of the range (150 dwellings) has been derived in the draft policy. The supporting text to Policy SR4 is also clear that the dwelling figures are 'indicative...based on an initial assessment' and are 'intended as a guide'. Draft LPPU paragraph 6.3.14 adds that, *'the capacity of sites will ultimately depend on various factors that need to be addressed at application stage, including detailed design and layout.'*
- 6.2.8. In this regard it is notable that the accompanying Vision Document demonstrates the capacity for at least 240 homes, including a range of housing, based on consideration of the site constraints and opportunities. It is important the Vision Document (which has been informed by further design and assessment work), as well as the supporting LPPU evidence base, is also taken into account in defining a quantum of development within Policy SR4g.
- 6.2.9. Notably, the assessment of the highest capacity option (200 dwellings) in the SA (November 2024) is identical to the lower capacity option (100-150 dwellings), aside from a statement that, *'it is likely that a development that comprises a smaller urban density would be more appropriate to the surrounding townscape and location...'*. It is however clear from the brief reference to 'it is likely' that this assessment has not been informed by any detailed assessment.

- 6.2.10. The lower capacity option 4 (100-150 dwellings), considered in the SA (November 2024) is also assessed to have a *'significant effect...if it has a specific focus on family housing'*. However, as set out in the accompanying Vision Document, the increased capacity of 240 dwellings could include approximately 50% 3-bed homes and therefore also provide significant and likely greater benefits in the amount of family housing sought.
- 6.2.11. Accordingly, whilst the quantum of development set out in Policy SR4g is only intended as a guide, it is clear that this should be significantly increased based on the SA (November 2024) and the additional design and assessment work undertaken to inform the accompanying Vision Document.
- 6.2.12. It is noted that the supporting text to Policy H2 (as referred to above) is also clear that *'Local Plans should set minimum densities for residential development'*, and that, *'Even above the minimum density, there is still significant scope for a range of densities.'* (paragraphs 4.4.8 to 4.4.10). As referred to above, the approach to setting minimum densities reflects the provisions of the NPPF (2023), and the acknowledgement that the density of town centres site may exceed the minimum density is welcomed. It is however, important that clarification is included to this effect in Policy SR4 itself, along with clarification that the ranges are indicative and intended as a guide.

Development requirements

- 6.2.13. Policy CR14r sets out a list of criteria for development at the Site to address relating to transport, trees, landscape, biodiversity, archaeology, contamination, air quality, noise and water.
- 6.2.14. Notably Paragraph 16 of the NPPF (2023) states that Plans should avoid 'unnecessary duplication' of policies. It is therefore questioned whether these criteria are necessary as part of SR4g given that these matters are covered by other LPPU policies.
- 6.2.15. Notwithstanding this, below we set out comments in relation to each of the relevant criteria listed under CR14r.

'Contribute towards an improved Sunday bus service to and from the town centre'

- 6.2.16. The draft LPPU (Policy TR2) and draft Infrastructure Delivery Plan (IDP) identify a number of major transport schemes for delivery in South Reading, based on the Reading Transport Strategy 2040, including Bus Rapid Transit for example and other wider public transport improvements. The IDP and Transport Strategy do not however refer specifically to Sunday bus services in this area or in the borough.
- 6.2.17. It is acknowledged that the Site is located in close proximity to public transport nodes and routes along the A33 and Rose Kiln Lane. The proposed development therefore has the opportunity to integrate the new community with the public transport network and support wider accessibility. However, the need to contribute towards Sunday bus services should be determined based on the scale and impact of proposed development.

6.2.18. It will be important however that any planning obligations sought to support wider infrastructure meet all of the tests set out in paragraph 57 of the NPPF (2023), which states that, *'Planning obligations must only be sought where they meet all of the following tests:*

- *necessary to make the development acceptable in planning terms;*
- *directly related to the development; and*
- *fairly and reasonably related in scale and kind to the development.'*

6.2.19. Based on the above, it is considered that the criteria should be amended to refer to contributing towards improved Sunday bus services as appropriate.

'Avoid adverse effects on important trees including those protected by TPO'

6.2.20. The Site and its immediate context includes some high-quality green infrastructure including mature trees and TPOs along much of the northern and western site boundaries.

6.2.21. As explained in the accompanying Vision Document, the proposed development of the Site will seek to retain and integrate with existing green infrastructure. The Illustrative Masterplan, included within the Vision Document, includes proposed development stepped back from Holy Brook and from the Kennet Meadows to seek to allow for the retention of existing important trees along these two key boundaries and avoid adverse effects.

Avoid adverse effects on the Major Landscape Feature by ensuring that development does not present a hard urban edge to the Kennet Meadows

6.2.22. The Site is located adjacent to the east of the Holy Brook / Kennet and Meadows which is designated as a 'Major Landscape Feature' and identified 'Area of Biodiversity Interest'.

6.2.23. It is not anticipated redevelopment of the Site would adversely affect this land and would rather provide opportunities for conservation, links to the green and blue network and biodiversity enhancement. Indeed given Sorbon's control over the adjacent land, the Site also represents a unique opportunity for residential development on the edge of the town centre to link into and 'open up' areas of the green open space to the local community; with footpath connections and increased connectivity into the existing Public Right of Way (PRoW) network.

6.2.24. The Illustrative Masterplan, included within the Vision Document, illustrates development stepped back and angled from the site boundary in order to create a 'soft' edge in line with the policy aims.

Ensure that development is set back at least 10m from the top of the bank of the adjacent watercourse to provide a buffer for biodiversity

6.2.25. The Site is located adjacent to Holy Brook where the design of proposed development will seek to provide an appropriate response.

- 6.2.26. This criteria however requires further clarity and evidence regarding the required set back distance sought and the definition of ‘development’ and ‘top of the bank’. It is recommended that the criteria is updated to include reference to ‘built development’ and to delete a specific set back distance which should be determined instead through further detailed design and technical assessment work.

Take account of potential archaeological significance

- 6.2.27. The requirement for development of the Site to take account of or address matters relating to archaeology, contamination, air quality, noise, light and water are acknowledged.

- 6.2.28. However, as referred to above, based on paragraph 16 of the NPPF (2023), it is questioned whether these criteria are necessary as part of SR4g given that these matters are covered by other LPPU policies.

6.3. Summary

With reference to paragraph 35 of the NPPF 2023, the following changes are recommended to Policy SR4 in order to ensure the Plan meets the tests of soundness.

*“The following sites will be developed according with the principles set out in this policy. **The dwelling or floorspace figures stated are minimums and are intended as a guide....***

“SR4g READING LINK RETAIL PARK, ROSE KILN LANE

Development for residential.

Development should:

- *Contribute towards an improved Sunday bus service to and from the town centre **as appropriate**;*
- *Avoid adverse effects on important trees including those protected by TPO;*
- *Avoid adverse effects on the Major Landscape Feature by ensuring that development does not present a hard urban edge to the Kennet Meadows;*
- *Ensure that **built** development is set back ~~at least 10m~~ from the ~~top of the bank of the adjacent~~ watercourse to provide a buffer for biodiversity;*
- *Take account of potential archaeological significance;*
- *Address any contamination on site;*
- *Address air quality impacts on residential use;*
- *Address noise and light impacts on residential use; and*
- *Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.*

Site size: 2.12 ha

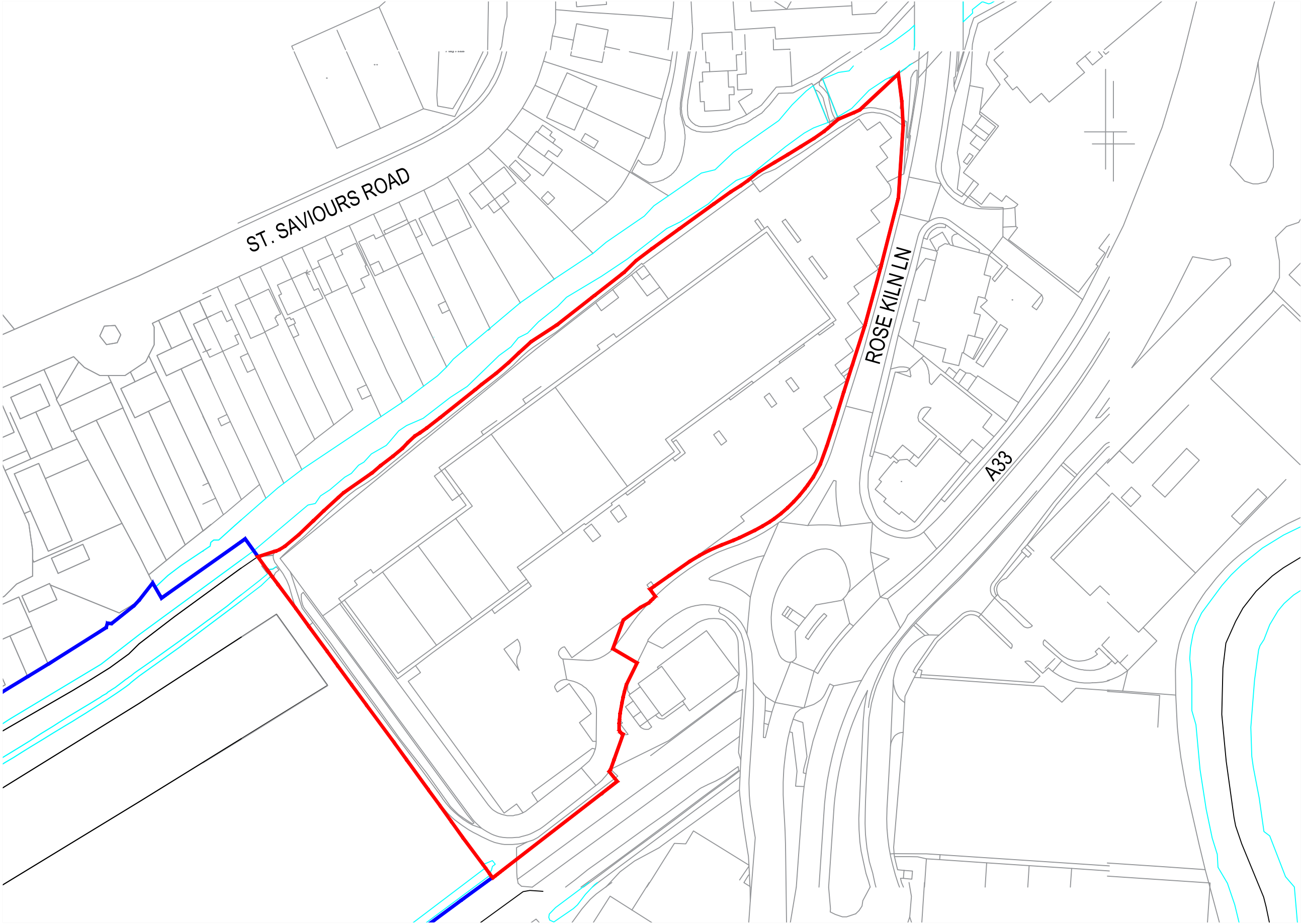
*~~150-220~~ **240** dwellings”*

7. Conclusion

7.1. Summary

- 7.1.1. These representations have been prepared on behalf of Sorbon Estates in relation to the current Regulation 19 Pre-Submission consultation for the Reading Borough LPPU. Comments have been provided based on key policies and supporting text within the draft Regulation 19 draft Local Plan, as well as the supporting evidence base documents, to assist in informing the final stages of the LPPU.
- 7.1.2. Sorbon Estates Ltd are in control of Reading Link Retail Park which is allocated for residential development under draft LPPU Policy SR14g (Reading Link Retail Park, Rose Kiln Lane).
- 7.1.3. It is welcomed that the Reading Link Retail Park is allocated for residential development under Policy SR14g of the draft LPPU.
- 7.1.4. The Site comprises brownfield land in a sustainable location which provides an opportunity for an appropriate high-quality, landscape-led and attractive gateway development to contribute towards the aims and aspirations of the LPPU. The accompanying Vision Document (Appendix XX) with Illustrative Masterplan demonstrates how development could be accommodated on the site and how the proposed allocation could be delivered.
- 7.1.5. Notwithstanding this, a number of changes are recommended to draft LPPU Policy SR14g and other draft LPPU policies in order to ensure the soundness of the Plan, with reference to paragraph 35 of the NPPF (2023).

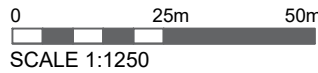
Appendix 1 – Site Location Plan



Legend

Reading Link Gateway Boundary

Wider Ownership - Sorbon Estates



Site Location Plan - 1.1250@A3

Reading Link Gateway

Sorbon Estates

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drawing no.	DWG04
revision	-
drawn by	ML
date	30.01.23

drawing title	Site Location Plan
scale	1:1250@A3
checked by	-
job no.	SNUD418688



URBAN
DESIGN
STUDIO

savills

Appendix 2 – Vision Document

READING LINK GATEWAY

A VISION FOR A NEW SUSTAINABLE RESIDENTIAL NEIGHBOURHOOD



JANUARY 2024

Urban
Design
Studio

savills

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SORBON

— ESTATES —

This Vision Document demonstrates and explains how a sensitively designed residential-led development can create a sustainable and integrated new neighbourhood at the gateway of Reading.

Sorbon Estates are committed to creating meaningful social and environmental value and are excited to set out their vision for a high-quality and thriving new neighbourhood at Reading Link Gateway.

The land to the west of Rose Kiln Lane has the potential to deliver a range of housing typologies for at least 240 homes, with capacity for more, depending on the scale and housing mix provided. The development can also unlock strategic connections, integrate high-quality contextual blue and green networks and provide landscape-led play and public spaces.



...CAN DELIVER A **TRANSFORMATIVE**
INCLUSIVE COMMUNITY
AND BE

...CAN BE A PLACE WITH **A VARIETY OF**
OPPORTUNITIES FOR STUDENTS

...CAN HAVE **A WELCOMING AND**
ENVIRONMENT, WITH A STRONG

...CAN PROVIDE **NEW CONNECTIONS**
THE EXISTING ESTABLISHED **LANDS**
MOVEMENT NETWORK

...CAN ACT AS **A HIGH-QUALITY**
GATEWAY INTO READING

READING LINK GATEWAY...

THRIVING, SUSTAINABLE AND
COMMUNITY FOR THE 21ST CENTURY
BEYOND.

TY OF CHOICES TO LIVE AND
SOCIAL INTERACTION.

ND SENSITIVELY DESIGNED
STRONG SENSE OF IDENTITY.

CTIONS TO
SCAPE AND
ARK.

LITY
G.



OUR VISION FOR READING LINK GATEWAY

A placemaking and landscape-led design approach will ensure the development responds positively to the context and opportunities of the surrounding area and The Site. This early concept design has been developed to bring new site-specific ideas into play, as well as drawing on best practice.

The vision is driven by the objective of creating a strong sense of place which seamlessly fits within the wider connectivity structure/aspirational routes and the established green and blue networks.

The new neighbourhood can provide the opportunity for high-quality development at a key gateway location for Reading. The key aims and objectives are:

- **To implement a design which embeds net zero carbon strategies with a focus on active and healthy living;**
- **To design a landscape-led masterplan that utilises unique environmental qualities of The Site and surrounding context to enhance the on-site biodiversity.**
- **To design a neighbourhood that delivers a wide range of housing choices to meet local needs, including affordable and family homes;**
- **To design for greater diversity of activity and streets as attractive places;**
- **To provide open spaces which encourage social interaction - a selection of places for people to meet, socialise and play;**
- **To encourage people to walk and cycle to nearby destinations by connecting existing key routes and contextual landscape assets, such as Holy Brook Meadow and Holy Brook.**



Figure 1: Concept Illustration



Figure 2: *Concept Sketch*

SUSTAINABILITY & DESIGN PRINCIPLES

Our central design guiding principles for good placemaking are set out below. Residential neighbourhoods such as these should be designed to be resilient, self-sustaining and help to enhance the local area by adding value.

A SUSTAINABLE NEIGHBOURHOOD

A sustainable neighbourhood is a place that is based on health, liveability and thriving communities. It is a well-connected place that focuses on promoting active travel modes and quality of the public realm to support this. The design should facilitate easy access to facilities and services.

The neighbourhood should accommodate a range of households and tenures, with a variety of housing types, sizes and levels of affordability. Residents of the neighbourhood will have easy access to a variety of green spaces and better air quality.

There are various site specific strategies that will embed sustainable development at Reading Link Gateway, these are:

1 A Well Connected Place:

Encouraging active travel will be essential to create a sustainable community. Design strategy can promote a modal shift towards public transport and active travel methods by utilising the existing movement network and, where possible, provide additional connections.

Cycle and Pedestrian routes are integrated through all movement routes and pathways and lanes will link into adjoining residential areas, into landscape features and the wider movement network.

2 Biodiversity Net Gain & Ecology Enhancement:

Unique landscape features will be retained and integrated into the public realm and shared spaces. Green-blue streets and spaces throughout The Site will help to enhance the local biodiversity and ecology. Biodiversity net gain must and will be carefully considered from the scale of the courtyard, back garden, doorstep, and street-through to major open spaces.

3 Water Sensitive Urban Design:

A nature-based design approach is an integral aspect to the vision for delivering a unique neighbourhood. Integrating any necessary SuDs, swales, rain gardens into the design framework will provide opportunities for play, ecological enhancement, biodiversity gain and beauty into the neighbourhood.

4 Mixed Tenure High Quality Homes:

The key to achieving sustainable neighbourhoods is to create a wide choice of housing types and tenures for a range of age groups and family profiles. Mixing tenures on individual developments will help to establish a thriving and connected community and meets the required demand.

5 Sustainable Place-Shaping:

Delivering resilience will focus on achieving a future proofed, high-quality development across the environmental, social and economic strands of sustainability.

Prioritising the delivery of carbon neutral homes will facilitate the Government's Net Zero targets by 2030. This will be achieved by minimising whole life carbon emissions through a fabric-first approach to reduce energy demand combined with the specification of low carbon & renewable technologies; whilst new proposals should consider future reuse and recycling, reducing waste and supporting a circular economy.

COMPONENTS OF SUSTAINABLE & HEALTHY NEIGHBOURHOOD



**A WELL CONNECTED
PLACE**



**BIODIVERSITY &
ECOLOGY
ENHANCEMENT**



**WATER SENSITIVE
URBAN DESIGN**



**MIXED TENURE HIGH
QUALITY HOMES**



**SUSTAINABLE PLACE -
SHAPING**



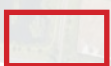
02

THE SITE





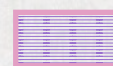
Figure 3: Site Location Plan



Reading Link Gateway Boundary



Sorbon Estates Wider Ownership



Reading Central Area
(CR1-10)

PLANNING CONTEXT & KEY POLICIES

The Reading Borough Local Plan was adopted on 4 November 2019 and sets out policies and proposals for Reading up to 2036. The Local Plan Partial Update (LPPU) consultation, on Scope and Content (under Regulation 18) (November 2023) sets out how the Council propose to update the existing adopted Local Plan (2019), for new development up to 2041” “The Site was submitted to the Reading Borough Council (RBC) ‘Call for Sites’ consultation in June 2023. Subsequently, The Site has been included within the consultation document as a ‘potential allocation’ in South Reading. This document sets out a vision of how this site could deliver new high-quality homes, aligned with the Aims and Objectives of the LPPU.

The Site comprises of several large and dated retail warehouse units permitted in the 1980s to the north of the site; with a large parking forecourt to the south. More recently, planning permission was granted for a Starbucks drive-through (application reference 201558), which has been built in the north-east corner of The Site.

The Site is in a highly sustainable location on the edge of the town centre, approximately 650m south of the boundary of the Central Reading Area, west of the junction of Rose Kiln Lane and the A33. It is located in close proximity to public transport nodes, with bus stops located only 100m from the site to the north, on Rose Kiln Lane. The bus stops serve the centre of Reading and Reading Train Station, which is only 2.7km from the site (a 7-minute cycle or 25-minute walk). It is also served by the strategic road network, with Junction 11 of the M4 located 3.6km to the south.

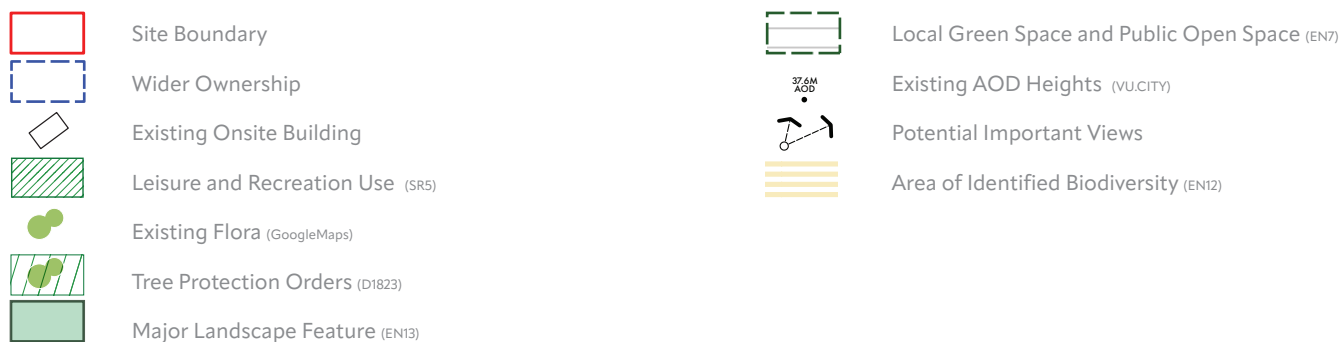
Immediately to the north-west of The Site is Coley Park, a predominantly residential area; with local shops; a recreation ground and amenities. Immediately to the north on Rose Kiln Lane, there are several residential apartment blocks, three to four storeys in height, lining the road frontage. Immediately to the east opposite The Site on Rose Kiln Lane, there is a two-storey apartment building (converted from offices).

To the north-east, on the west side of the A33, are several car dealerships and a builder’s yard (Pulleyn Park, Rose Kiln Lane), which is allocated in the adopted Local Plan 2019 for 70 to 100 dwellings (Site SR4a). To the north of this site, is ‘Riverside View’, a development comprising apartment blocks up eight storeys in height, originally permitted on appeal in 2008 for 112 apartments (appeal reference APP/E0345/A/07/2049497).

The Site is not subject to any significant planning policies or constraints that would limit the redevelopment potential. It is not within a designated Employment Area, Retail frontage or within the setting of any Heritage Assets.



Figure 4: Landscape and Topographic Constraints





KNOWING THE CONSTRAINTS

Our vision for Reading Link Gateway demonstrates how the land is suitable for delivering a sustainable, well connected and attractive new neighbourhood. The Site presents a range of constraints. However, these constraints are not considered to limit the vision for The Site and many of these in return offer plenty of opportunity to create a unique place. They include:

EXISTING VEGETATION

The Site is occupied by a variety of flora which includes Tree Preservation Orders along much of The Site's western and northern boundaries. These are valuable ecological and placemaking elements and wherever possible vegetation will be retained and integrated into the developments green infrastructure network.

GREEN - BLUE INFRASTRUCTURE

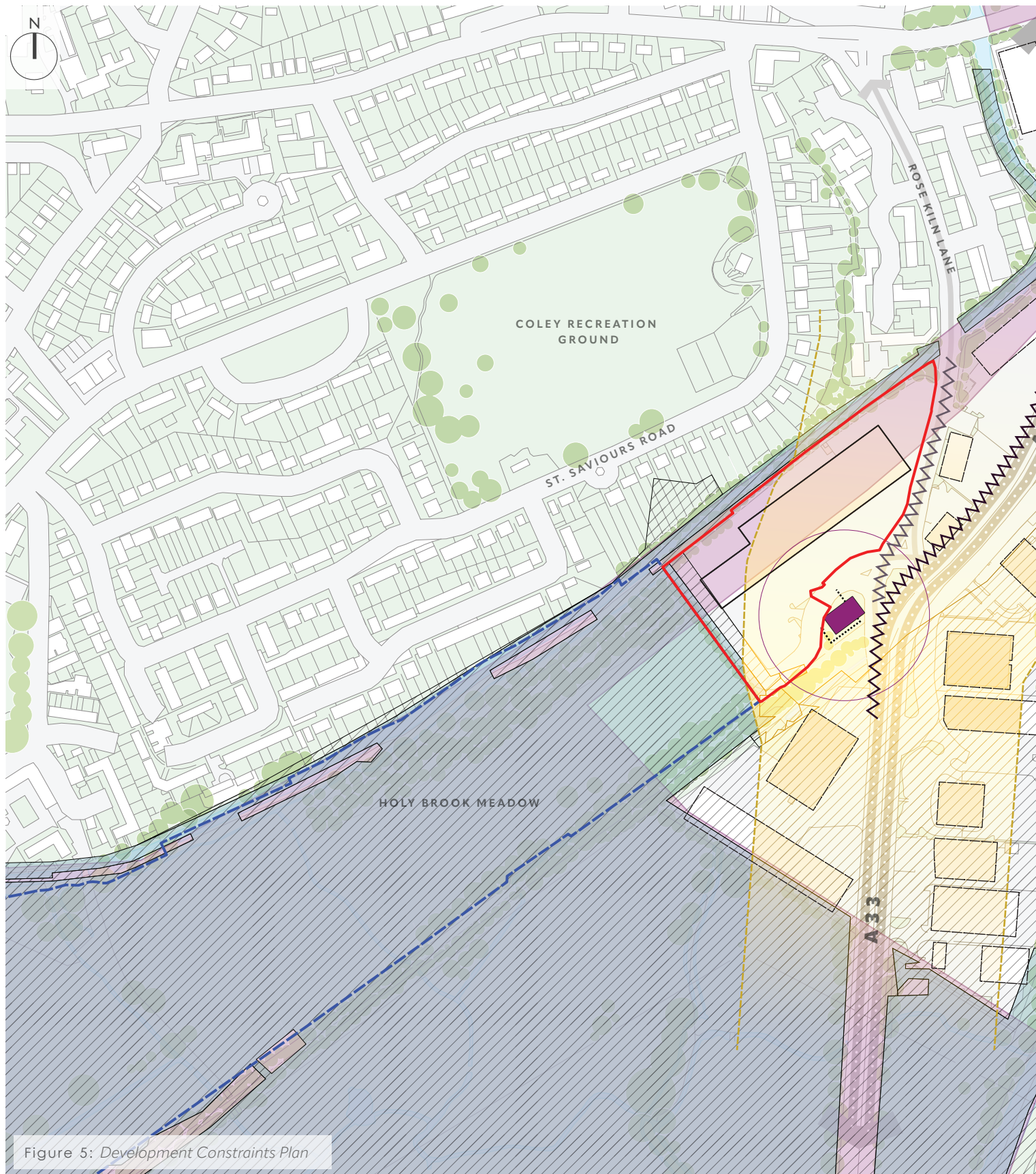
The Site and its immediate context contain high-quality blue and green infrastructure. For example, Holy Brook, mature trees and major landscape/biodiversity features, such as Holy Brook Meadow. The design strategy should respect, connect, integrate and utilise these fantastic elements.












TOPOGRAPHY & VIEWS

St. Saviours Road is c.8m higher than The Site. The level change is taken up within the backgardens of the properties to the north. Proposed development should respond to and respect the level changes and existing views.

The north-eastern corner of The Site is in a prominent location when travelling along the A33 from the south towards Reading. Development should respond appropriately in form and scale given its gateway location and visibility.

The Site is visible from Holy Brook Meadow in the west. Development should respond appropriately to draw the landscape into The Site and maintain a feeling of openness.



- | | | | |
|---|------------------------------------|---|---|
|  | Reading Link Gateway Boundary |  | Flood Zone 3 |
|  | Sorbon Estates Wider Ownership |  | Flood Zone 2 |
|  | Existing On-site Building |  | Area of Archaeological Potential Policy (EN2) |
|  | Existing Petrol Station & Access |  | Potential Noise Source |
|  | Air Quality Management Area (EN15) | | |
|  | Existing Flora (GoogleMaps) | | |
|  | Commercial Buildings (EN7) | | |



KNOWING THE CONSTRAINTS CONTIN.

FLOOD ZONE AND DRAINAGE:

Much of The Site's developable area is within Flood Zone 1, whilst the northern boundary (adjacent to Holy Brook) and western boundary (adjacent to Holy Brook Meadow) are Flood Zone 2/3.

Where necessary, Sustainable Drainage Systems and surface water management features can be incorporated throughout the green infrastructure. Such an approach can enhance biodiversity and create attractive playful spaces.

SITE CONTEXT:

The Site's existing context and boundary conditions are contrasting in nature. To the north and southwest, the blue and green network dominate. While the south and east boundaries have harder conditions, such as A33, Rose Kiln Lane, Petrol Station and commercial buildings.

The design should respond appropriately to the boundary and contextual conditions, movement/access requirements and any potential adverse (e.g. noise) or positive impacts they could have on development.

AIR QUALITY MANAGEMENT:

It is noted that part of The Site is located within an Air Quality Management Area. The development should seek to minimise air pollution through promotion of sustainable transport modes.

AREA OF ARCHAEOLOGICAL POTENTIAL:

It is noted that part of The Site is located within an Area of Archaeological Potential, this is not considered as a constraint at this stage and would be investigated further as the design evolves.



Figure 6: Opportunities Plan

- | | | | |
|--|--------------------------------|--|---|
| | Site Boundary | | Existing or Proposed Green Link (EN12) |
| | Wider Ownership | | Existing Footpath (Open Street Maps) |
| | Existing Flora (GoogleMaps) | | Contextual Cycle Routes (RBC-Cycling-Map) |
| | Tree Protection Orders (D1823) | | Promote Foot and Cycle Connection |
| | Key Views | | Strengthened Foot and Cycle Connection |
| | Allocated Development Sites | | Potential Landscape Connections |
| | Riverside View Development | | Gateway Building(s) |



Integrate Landscape and Blue Network

Existing Bus Network

REALISING THE STRATEGIC OPPORTUNITY

The Site presents a range of constraints, however, many offer the opportunity to create a unique place and contribute to wider strategic development. The main opportunities include:

CHANGING CONTEXT:

The Site's existing context to the east is changing with various sites allocated for development (Policy SR4A & SR3) and others having been developed (Riverside View).

The Site therefore presents an opportunity to positively add to the changing nature of the location.

GREEN-BLUE INFRASTRUCTURE

The Site presents the opportunity to (re)connect the major high-quality landscape features in the south and west for the benefit of the immediate community and Reading.

CREATING CONNECTIONS

The Site presents the opportunity to strengthen and create new connections, such as:

- Landscape foot and cycle route along Holy Brook
- Promote foot and cycle connections along Rose Kiln Lane which connect into the wider movement network.
- Potential additional landscape connections across Holy Brook Meadow within Sorbon Estates' wider ownership which connect into the existing footpath network.
- Integrate the new community with the existing bus, wider public transport network and cycle routes.

GATEWAY TO READING

The Site presents a opportunity to redevelop previously developed land and enhance the public realm and connectivity network as part of the gateway to Reading.

The Site is prominent when travelling from the south and therefore is a fantastic opportunity for a gateway building(s) to terminate important views.

03

THE CONCEPT



GREEN & BLUE NETWORK

The Site and the wider ownership contain high-quality ecological assets, such as Holy Brook and Holy Brook Meadows. There is therefore a fantastic opportunity for a landscape-led masterplan which includes the following:

1. Landscape Led Streets and Spaces

Draw the major blue and green networks through the streetscape and public spaces.

2. Reconnect with the Landscape

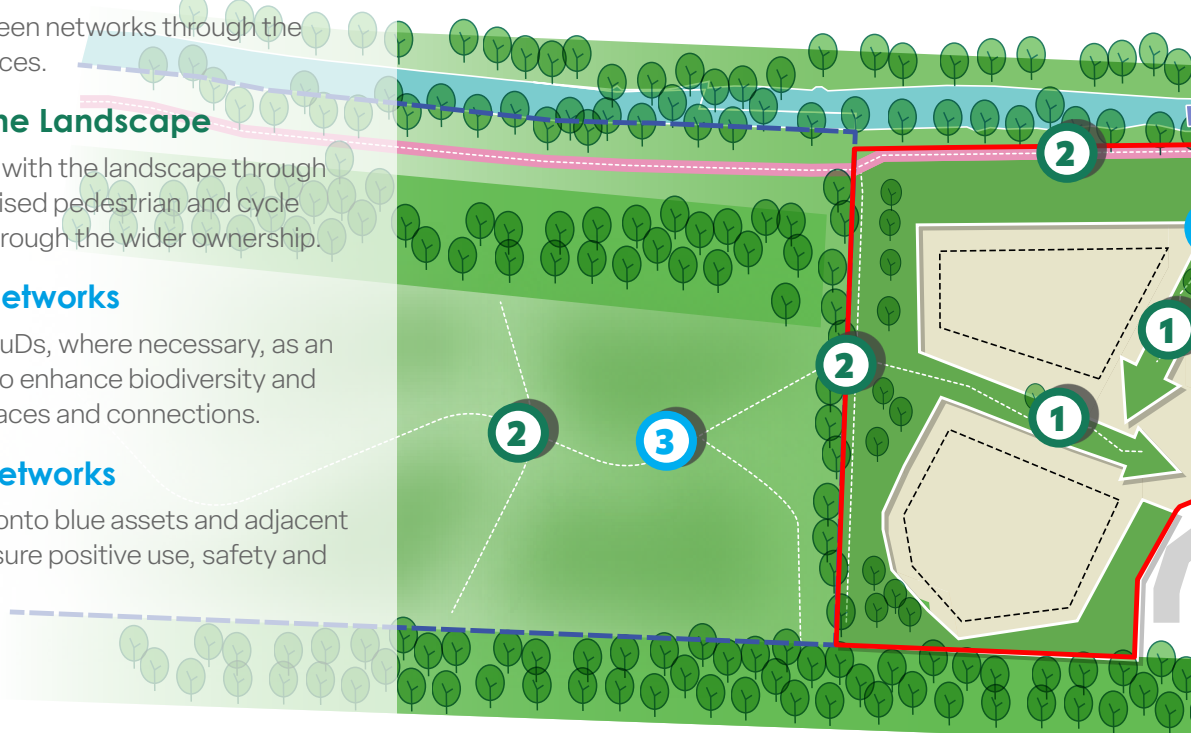
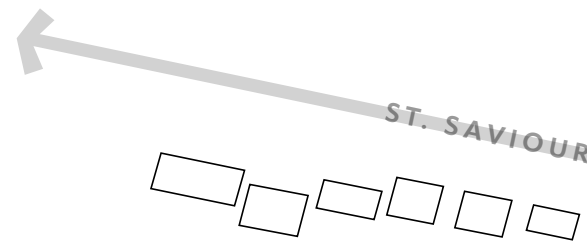
Reconnect the community with the landscape through the provision of new/revitalised pedestrian and cycle networks on the site and through the wider ownership.

3. Integrated Blue Networks

Integrate blue assets and SuDs, where necessary, as an integral part of the design to enhance biodiversity and create attractive playful spaces and connections.

4. Activating Blue Networks

Provide sensitive frontage onto blue assets and adjacent movement networks to ensure positive use, safety and surveillance.



1. Landscape Led Streets and Spaces

4. Activating Blue Networks



3. Integrated Blue Networks



2. Reconnect with the Landscape



DIVERSE BUILDING TYPOLOGIES

The Site's location and context provide a unique opportunity for a diverse housing mix, including larger family maisonnettes over two storeys. The Site presents the opportunity for the following:

1. Appropriate Typologies:

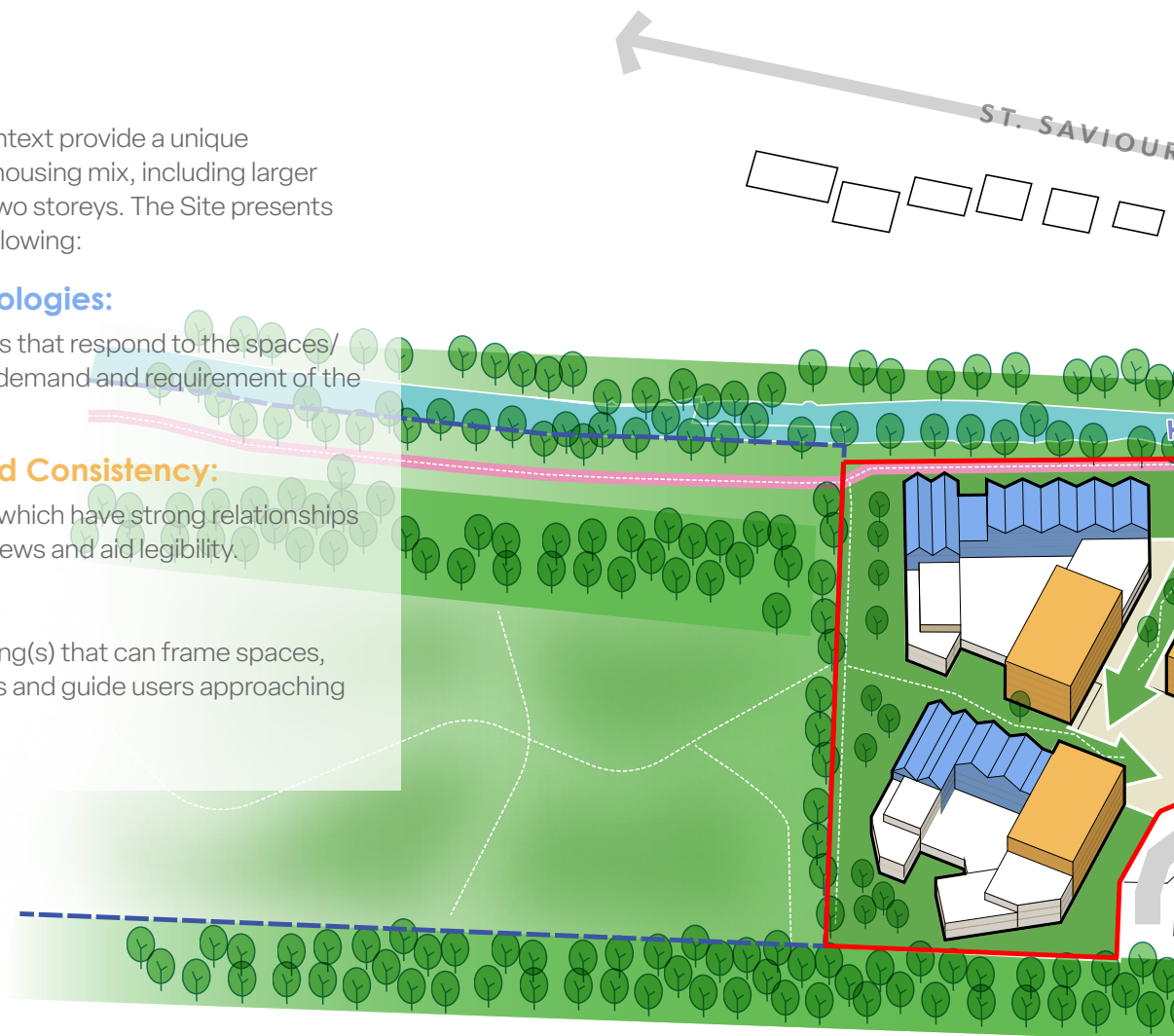
Diverse building typologies that respond to the spaces/routes they front and the demand and requirement of the area.

2. Relationships and Consistency:

Pragmatic building forms which have strong relationships to define spaces, frame views and aid legibility.

3. Marker Buildings

High-quality marker building(s) that can frame spaces, terminate important views and guide users approaching a gateway.



1. Appropriate Typologies



3. Marker Buildings



2. Relationships and Consistency



HEIGHT STRATEGY

The Site's location, context and varied boundary conditions provide a unique opportunity for a range of building heights. The Site presents the opportunity for the following:

1. Low:

Low scale intimate typologies/forms fronting onto major landscape features, blue networks and adjacent existing housing provide an appropriate response to sensitive edges.

2. Mid:

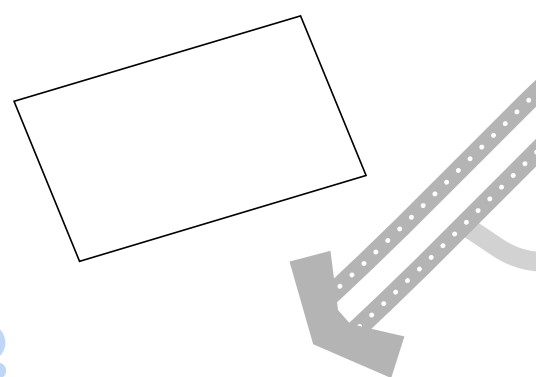
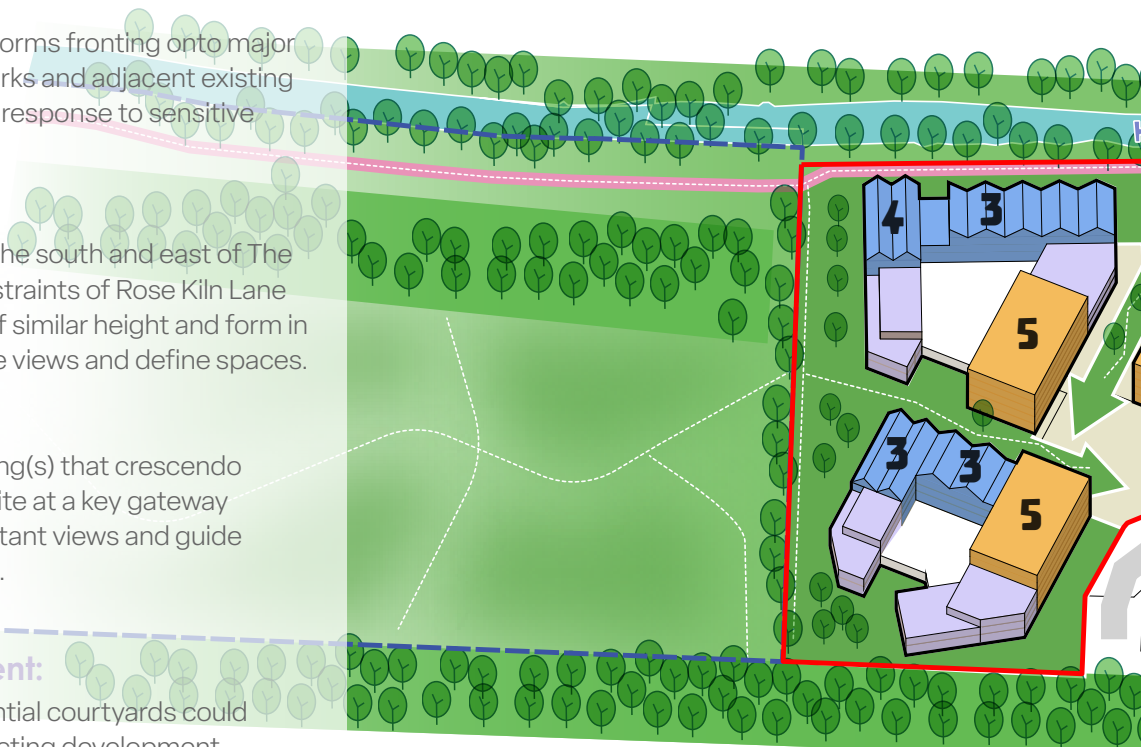
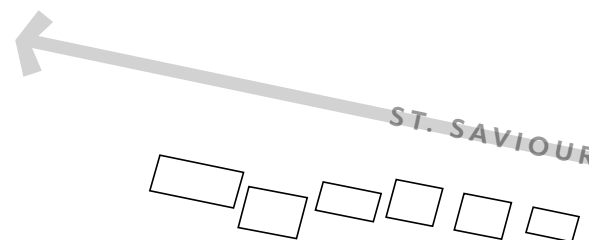
Mid height linear typologies to the south and east of The Site fronting onto the hard constraints of Rose Kiln Lane and A33. Clustering buildings of similar height and form in this location help formally frame views and define spaces.

3. Upper:

Taller high-quality marker building(s) that crescendo towards the northeast of The Site at a key gateway location would terminate important views and guide users approaching the gateway.

Connecting Development:

In addition to the above, residential courtyards could contain small, 1-3 storey connecting development which partly closes the residential courtyards. This typology largely sits to the south of each parcel to reduce overshadowing of residential courtyards and units.



1. Low



3. Upper



2. Mid



PUBLIC, SEMI-PRIVATE AND PRIVATE SPACES

The Site's development form and landscape-led approach allows for a diverse variety of public, semi-private and private open spaces and play spaces.

1. Landscape Led Streets

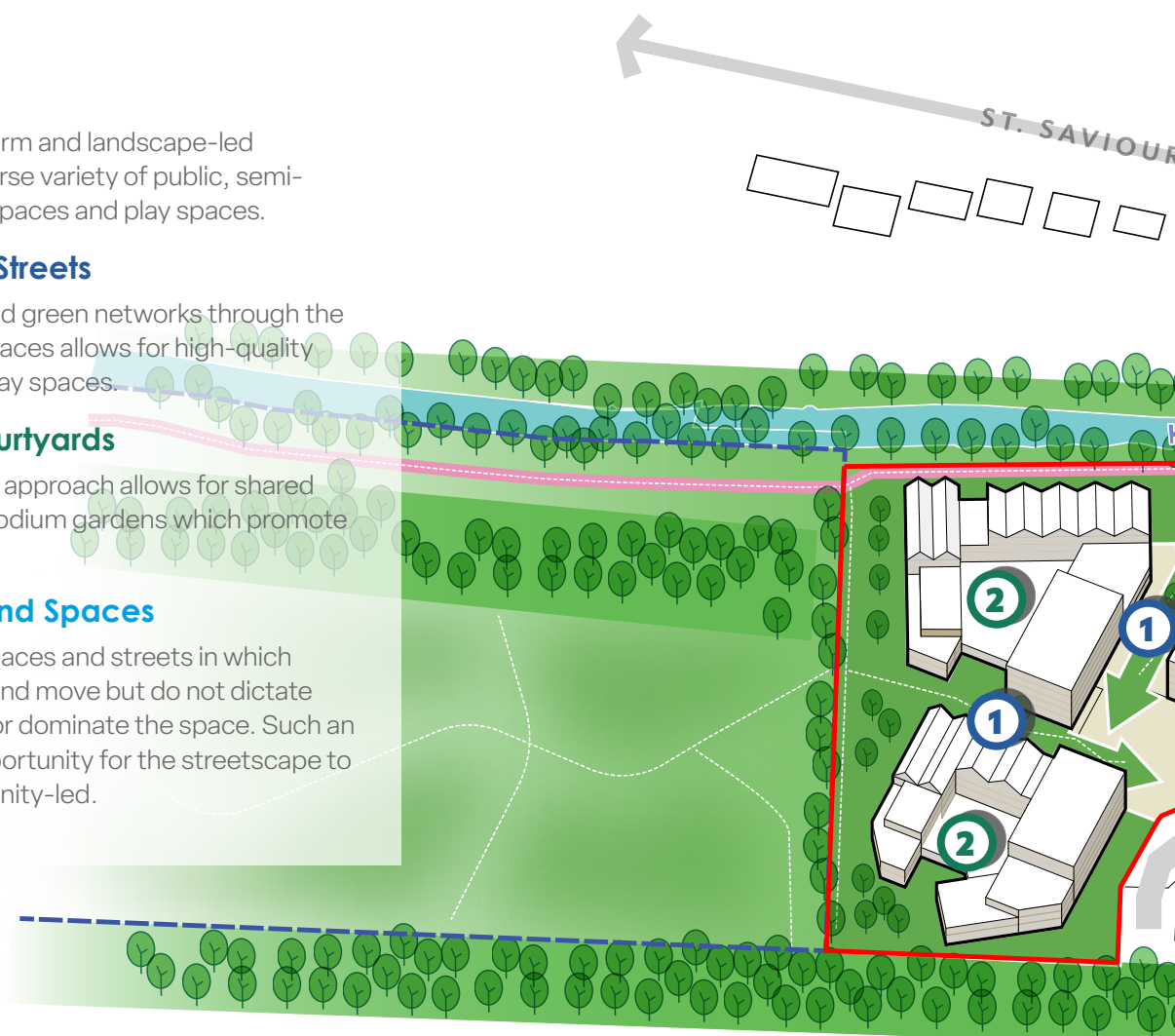
Drawing the major blue and green networks through the streetscape and public spaces allows for high-quality shared open space and play spaces.

2. Semi-Private Courtyards

A courtyard based design approach allows for shared semi-private residential podium gardens which promote community interaction.

3. Shared Streets and Spaces

Opportunity for shared spaces and streets in which vehicles are able to pass and move but do not dictate the movement hierarchy or dominate the space. Such an approach provides an opportunity for the streetscape to be landscape and community-led.



1. Landscape Led Streets



3. Shared Streets and Spaces



2. Semi-Private Courtyards





04

THE MASTERPLAN



ILLUSTRATIVE MASTERPLAN

The Concept Masterplan demonstrates one option how The Site is suitable for the delivery of a sustainable gateway development. It demonstrates the capacity for at least 240 high-quality new homes, including approximately 50% family homes (3 Bed +) in the form of maisonettes.

The Concept Masterplan delivers the following features:

1. Holy Brook landscape corridor which connects Holy Brook Meadow to Rose Kiln Lane and the wider connectivity network. Development fronting this corridor fluctuates in distance but maintains a formal frontage to ensure activation and safe use of the space.

2. Informal western frontage facing Holy Brook Meadow. The varied facade angle and lower scale development form respects and softens views of the development when viewed from Holy Brook Meadow.

3. Landscape fingers draw the high-quality blue and green networks surrounding The Site into the development and its open spaces. These landscape-led spaces are pedestrian and cycle priority and can contain SuDs features where necessary.

4. Shared open space to the south of the development allows vehicular and cycle movement to access the parking podium.

5. Podium level residential courtyards within each development plot provides the opportunity for private and semi-private community open space and play space.

6. Potential Footpath connections within Sorbon Estates' wider ownership would allow the development to connect into the existing footpath network and the community to benefit from this feature.

General:

Development orientation layout, scale and form has been designed in such a way to ensure high-quality climatic conditions within the units, within residential courtyards and public open spaces.





ates Wider Ownership

Indicative Site Access

ILLUSTRATIVE VIEWS

The Concept Illustrations demonstrates one option how The Site is suitable for the delivery of a sustainable gateway development. It demonstrates how the following features could be integrated:

- ① Holy Brook landscape corridor
- ② Informal western frontage
- ③ Landscape fingers
- ④ Shared open space
- ⑤ Podium level residential courtyard
- ⑥ Potential footpath connections
- ⑦ Gateway buildings within the silhouette of Reading

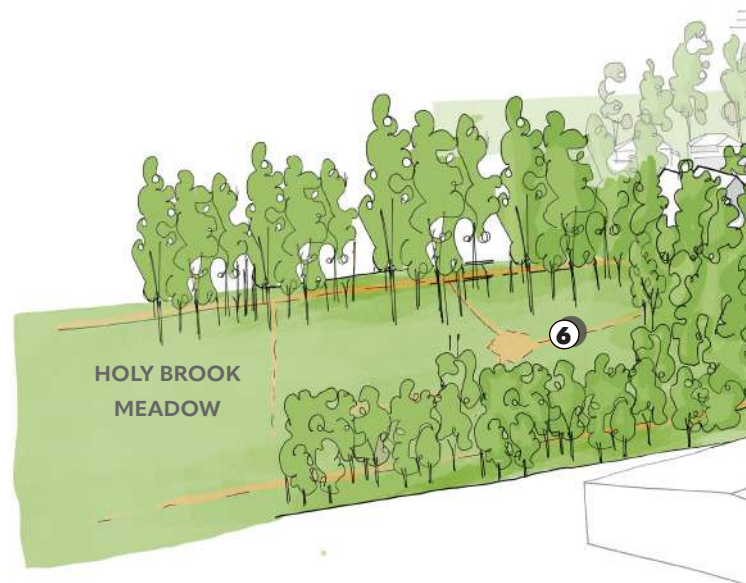


Figure 8: Concept Illustration 1

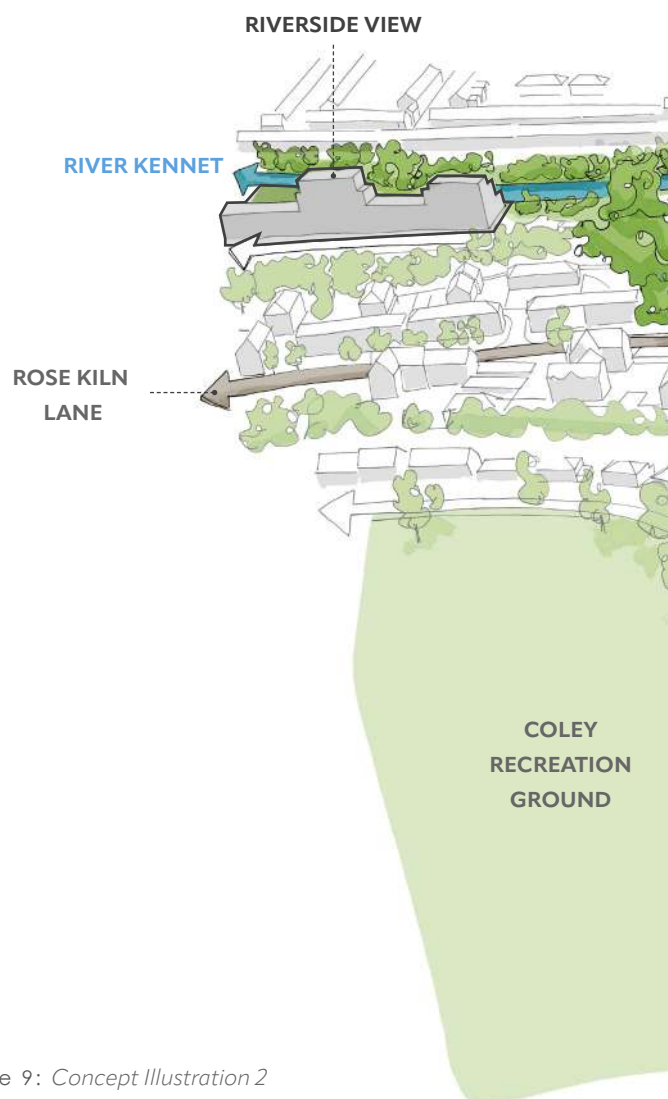
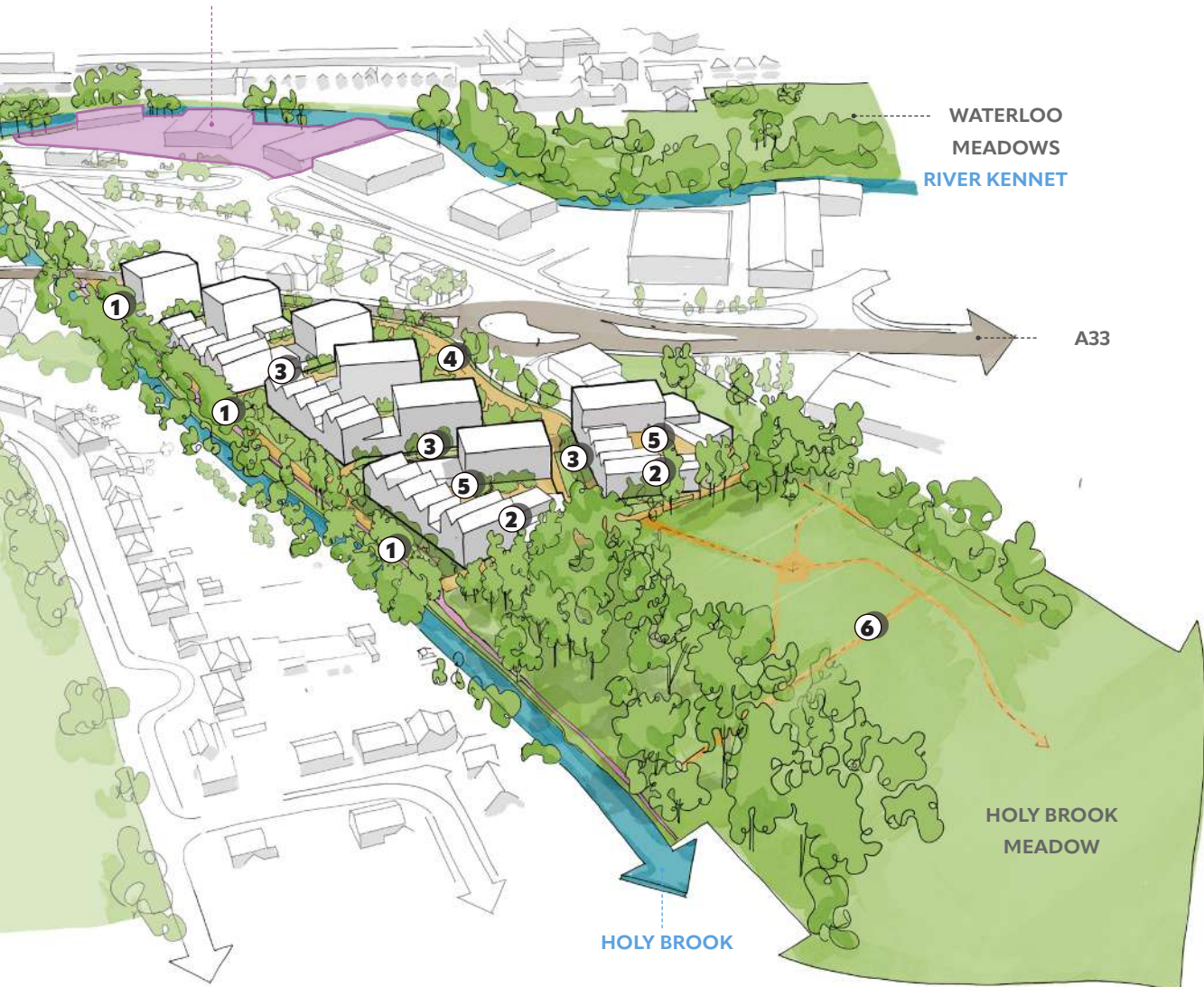


Figure 9: Concept Illustration 2

STATION HILL DEVELOPMENT



POLICY AREA SR4A



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South Oxfordshire District Council and Vale of White Horse District Council

(Response from webform)

Title: Mrs

First name: Emma

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?: Multiple policies

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

Do you consider the Local Plan is sound?:

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). 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)?:

Author name: Emma Baker

Policy and Programmes

HEAD OF SERVICE: Tim Oruye



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Civic Offices
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RG1 2LU

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Abbey House, Abbey Close, Abingdon,
OXON, OX14 3JE

17 December 2024

Dear Planning Policy Team

We're grateful for the opportunity to participate in the Regulation 19 Consultation for the [Reading Local Plan partial update](#).

We note that you are partially updating the December 2019 Reading Local Plan, which will soon be over five years old. The plan's end date will be extended from 2036 to 2041. We see the partial update affects approximately half of the policies within the 2019 Local Plan, and that other policies are to be carried forward.

Vision and Strategic Objectives

We generally believe the proposed themes and the Reading Local Plan vision are sound. The updated policies' ambitious climate and environmental vision, aiming for net-zero carbon emissions in Reading by 2030 to combat the climate emergency, has our support.

Spatial Strategy

We support the proposed spatial strategy updates, which remain focused on Central Reading and remain an appropriate sound strategy for Reading. Likewise, the South and Vale spatial strategy in our emerging Local Plan does not focus development near Reading.

Climate Change

A new objective targeting climate change issues has been added to the local plan's partial update: *'Respond to the climate emergency by contributing to achieving a net zero carbon Reading by 2030'*.

Policies in the Plan are then enhanced to help achieve this objective.

We support the focus in the cross cutting policies on seeking to achieve the net zero carbon Reading by 2030 objective.

However, policies CC2 and H5 require all new build housing to be built to the optional water efficiency standard (under Regulation 36(3) of the Building Regulations) to achieve water neutrality 'where possible'. We think you would be justified in going further and making your policies more effective, given the area is under serious water stress as per the [Environment Agency classification](#), and the general population growth that remains higher than the national average. By way of example, in our Joint Local Plan which we recently submitted for examination, we have proposed a higher water efficiency standard in JLP Policy CE7 of water use not exceeding 100 litres per person per day, or any future tighter standard that may replace this. We have also produced a Water Efficiency Topic Paper, available [here](#).

Housing Need and Requirements

The Government sets out in the NPPF/PPG that it expects all authorities to follow the standard method to determine the number of homes needed, unless exceptional circumstances justify an alternative approach, which also reflects current and future demographic trends and market signals (December 2023 National Planning Policy Framework paragraph 61).

We support Reading's proposed housing requirement and believe it to be sound. Reading Borough Council has a revised Housing Needs Assessment (July 2024) which has identified a local housing need of 735 homes per year to 2041, which is lower than the standard method. We support the exceptional circumstances that justify the alternative approach to the standard method proposed by the Council in the Housing Provision Background Paper (November 2024).

Reading has a Housing and Economic Land Availability Assessment confirming the ability to meet needs in full to 2041, delivering 825 homes per year. This means that there is no expectation of unmet housing need needing to be planned for by neighbouring local authorities.

Employment Need and Supply

Reading Borough Council identifies the need for additional office and industrial floorspace. Existing allocations and as yet un-implemented permissions, plus windfall employment sites will contribute towards meeting this employment need. We believe the employment strategy to be sound.

Infrastructure

The strategy outlined in the Plan for the provision of strategic infrastructure to facilitate the proposed development is detailed in section 10.3 of the Plan, along with the corresponding Table 10.2. This table summarises the Council's Infrastructure Delivery Plan (IDP) and the necessary components to support anticipated growth.

Table 10.2 identifies the Third Thames Crossing as a north-south route across the River Thames via a new road, public transport and active travel bridge and associated mitigation measures on the road network. You will be aware that there has not been enough work undertaken on the impact that this new road bridge would have on the Oxfordshire road network or the necessary mitigation measures needed. It is also not clear how the bridge and suitable road connections would be funded.

Table 10.2 also identifies a series of Park and Ride Mobility Hubs, and corridors where these hubs would be proposed - including three routes crossing the boundary with South Oxfordshire, although no sites are identified. Further work is needed to understand how these hubs could reduce car dependency and effective use of land.

Figure 8.1 in the Plan contains an Emmer Green area strategy, showing route arrows and park and ride symbols inside South Oxfordshire. This is not appropriate, given our adjoining district is not covered in the scope of Reading's Local Plan, and we ask that you amend the diagram. There is no evidence of the financial viability of these proposals and further work would be needed on the impacts on surrounding areas.

For these reasons we believe Section 10 currently to be unsound because it is not justified, not consistent with national policy, nor is it effective.

Duty to Co-operate

On 23 August 2024 Reading Borough Council communicated with local planning authorities within a 10km radius regarding housing need. The purpose of this communication was not to announce an unmet housing need, but rather to explore the potential for accommodating any unmet need should the Partial Update be informed by an alternative (the standard method). This unmet need was projected to total 954 homes to 2041.

Out of the nine authorities contacted, eight provided responses, with most indicating an inability to meet the identified need. Furthermore, the majority expressed that addressing this need at this stage was premature, as the standard method does not reflect the evidenced housing demand.

South and Vale consider that:

- The policies on housing need and employment need in the Reading Local Plan update have met the Duty to Cooperate legal test;
- Reading has collaborated closely throughout the process with South Oxfordshire and Vale of White Horse on potential strategic planning matters during the preparation of the Local Plan partial update and the Joint Local Plan for South and Vale;
- There are cross-boundary matters and 'live' issues that require continuous engagement with Reading Borough Council.

Yours sincerely



Emma Baker
Planning Policy Team leader

Sport England

From: Bob Sharples <Bob.Sharples@sportengland.org>
Sent: 11 December 2024 07:36
To: Planning Policy
Cc: Stanesby, Ben
Subject: Reading Local Plan - Partial Update - Sport England ref: SP/23/00005849

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 morning,

Thank you for inviting Sport England to comment on the Reading Local Plan – Partial Update.

The following are our comments on the plan:

4.1.32 We are disappointed that the reference to Active Design has been struck out. There are other local plans where Active Design is referenced. We would be grateful if it could be explained why it has been removed.

4.1.30 – the link to the Council's open spaces strategy does not work. However, the playing pitch strategy, which is dated November 2021, is considered by Sport England to be coming to the end of its life as it has not been kept up to date.

OU1: NEW AND EXISTING COMMUNITY FACILITIES

Sport England is supportive of this policy as it aligns with the National Planning Policy Framework Paragraph 103 and our own planning policies to protect playing fields.

However, should the bullet points not be a, b, and c which are struck through and not b, c and d. there is no a.

WR1: DEE PARK – Sport England is supportive of this policy however the requirement any new sports facilities need to be based on a robust evidence base e.g an up to date robust built facility strategy, (BSF) and playing pitch strategy, (PPS). The current Reading PPS is coming to the end of its life, whereas there is no BFS.

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

This policy is weak and could be considered to be contrary to National Planning Policy Framework. The current PPS is coming to the end of its life, and we do not think it justifies the loss of the playing fields. Secondly the NPPF does not allow for *Improvements to pitches elsewhere will be necessary to help to offset the loss of playing fields*. This should be omitted and replaced by the loss of playing field should be replaced to bring into line with the NPPF paragraph 103.

ER2: WHITEKNIGHTS CAMPUS, UNIVERSITY OF READING – Sport England is supportive of the principles of this policy but would seek to have clear justification for any new sports facilities and would seek to have them accessible by the local community, via a community use condition.

Table 10.2 Summary Infrastructure Delivery Schedule

Sport England is very supportive of RBC's desire for the *updating and improving Reading's indoor and outdoor sports provision*. However, this need to be done by having a robust evidence basis such as a built facilities strategy, (BFS) and playing pitch strategy, (PPS). The current Reading PPS is coming to the end of its life, whereas there is no BFS.

Once these strategies are in place they need to be kept up to date, unlike what has happened with the current PPS.

Please feel free to contact me if you require any clarification.

Kind regards

Bob

Bob Sharples RIBA ARB MRTPI Principal Planning Manager - South Team Planning & Active Environments

M: 07830315030

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org

St Edward Homes Limited

16th December 2024

Our Ref: 333100737/A3/EE/KC

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

Dear Sir/Madam

**LOCAL PLAN PARTIAL UPDATE: PRE-SUBMISSION DRAFT CONSULTATION
REPRESENTATIONS SUBMITTED ON BEHALF OF ST EDWARD HOMES LIMITED**

We write on behalf of our client, St Edward Homes Limited (St Edward), in response to Reading Borough Council's consultation on Pre-Submission Draft Local Plan Partial Update.

As background, St Edward own land at Green Park Village which is promoted for residential development as set out in the representations below.

These representations comment on the proposed Local Plan Partial Update and its associated evidence base, focusing upon the Council's proposed approach to addressing housing needs in the Borough and responding to the risks posed by hazardous installations.

Spatial Strategy

We support the continued reference within the Spatial Strategy to South Reading as a location for meeting much of the development needs other than those provided for in Central Reading, as set out at paragraph 3.2.1 of the consultation document. South Reading presents opportunities for highly sustainable development which benefits from connectivity to Central Reading and the wider area via a range of sustainable modes including train and bus.

As detailed further below, land at Green Park Village in South Reading presents an opportunity for sustainable development which would contribute towards meeting housing needs in a manner consistent with the proposed spatial strategy.

Policy EN19: Urban Greening Factor

We support the Council in seeking to achieve green coverage in the Borough, however it will be important that Policy EN19 does not unnecessarily inhibit development, especially when considered alongside biodiversity net gain requirements.

The provision of a 10% biodiversity net gain will result in additional green coverage, unless a site is exempt. The evidential basis for imposing, as opposed to encouraging, additional provision is therefore unclear. We therefore do not consider the policy to be sound.

If a policy requiring urban greening is considered necessary, to ensure that the policy does not inhibit development, it will be important that the score required is based on a realistic understanding of what can feasibly be delivered by development. We consider that additional work is necessary to establish scores

that can feasibly be provided (on all potential types of development) before a policy requirement is imposed. In the absence of sufficient evidence, the soundness of the policy as drafted is questioned.

Policy should also recognise that there will be some circumstances where the provision of a sizeable quantum of additional green coverage may be unachievable, for example on small, high-density developments. In the context of the development needs of the Borough, there is therefore a need for flexibility so that the land available for development can be used efficiently. Such flexibility is afforded in respect of biodiversity net gain, for example by enabling off-site provision where necessary, and so not having any flexibility in Policy EN19 could lead to development being inhibited.

Policy H1: Provision of Housing

We note that Policy H1 proposes the provision of 825 dwellings per annum. Whilst we welcome the increase in proposed housing provision compared to that proposed at Regulation 18 stage (800dpa), we question whether this figure is based on robust evidence and therefore sound.

Paragraph 4.4.2 outlines that the current standard methodology calculates a need of 878 homes, stating that 'the methodology includes a 35% uplift which makes a significant difference to the level of homes proposed, but which is not based on actual levels of local need'.

Paragraph 4.4.3 goes on to establish that the 2024 Housing Needs Assessment identifies a housing need of 735dpa and there are considered to be exceptional circumstances justifying using this assessment rather than the standard methodology. This is explained to be because 'Reading is in the unusual situation that the standard methodology (if the urban uplift is excluded) would result in a housing need that is too low, whilst the inclusion of the urban uplift results in a housing need that is too high' and Reading is the smallest of the authorities affected by the urban uplift 'which makes the application of an arbitrary urban uplift that applies only to the biggest cities inappropriate'.

In paragraph 4.4.4 it is explained that in the context of national policy supporting significant boosting of housing delivery, housing delivery has been considered and the assessed capacity of 825dpa is proposed to be used as the annual requirement.

We welcome the consideration of available capacity within the Borough and decision to pursue a greater level of housing delivery that the local assessment of need has identified as required. However, it is considered that there are opportunities for additional housing delivery, as we discuss further below, which would support an increased housing requirement in Policy H1.

Moreover, it is considered that housing need is greater than the Local Plan and its evidence base suggests. Changes to the standard methodology introduced on 12th December 2024 result in a substantially greater housing need figure for Reading of 1,028dpa.

In our view, the Local Plan should reflect the latest understanding of housing need and plan to meet that need in its entirety if it is to be positively prepared and sound. Planning for the identified housing need in full now is the only way to ensure that needs will be properly addressed and a significant boost to the supply of homes achieved, in line with the Government's objective as stated at paragraph 60 of the NPPF (December 2023).

Additional sites are available which could support the provision of additional housing to meet needs, for example Land at Green Park Village, as we discuss further below.

Policy H5: Standards for New Housing

The Berkeley Group are highly sustainable in terms of the homes and places they create, the way they build, and the way they run their company. This is evident in their climate action and nature recovery programmes, which started many years before legislation required them to act.

The Berkeley Group's 'Our Vision 2030' is an integrated and holistic strategy to maximise their positive impact through 10 strategic priorities, including climate action and nature.

Within this context, St Edward welcome and support the Council's efforts to promote high levels of sustainability.

However, a statement given in the House of Commons (on 13th December 2023) has outlined that the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. Moreover, it has advised that any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale. It is unclear what evidence has been prepared to justify the proposed requirements within Policy H5. In this context, the soundness of the policy is questioned.

Policy OU2: Hazardous Installations

We note that changes are proposed to reflect the updated Detailed Emergency Planning Zone (DEPZ) prepared in 2020, including an additional clause which deals specifically with development in the DEPZ for AWE Burghfield. The proposed text makes it clear that proposals will be judged in terms of their impact on the security and future of AWE B and whether the impact of increases in population within the DEPZ can be accommodated within the Burghfield Off-Site Emergency Plan (or its successor).

When applying the policy, it will be important that the scale of development proposed, its location, the population distribution of the area and the impact on public safety, including the impact of development on blue light services and the Off-Site Emergency Plan in the event of an emergency are considered. This will allow proper consideration of the risks posed.

The recent decision in the redetermined appeal at The Hollies in West Berkshire¹ has demonstrated that while there are very real risks, these are small, and development can also bring many benefits. This case proves that there are available sites which are capable of being developed safely with the DEPZ, delivering many benefits including the provision of housing. In this regard, if it is to be sound, it is vital that Policy OU2 takes account of the benefits that development could deliver as well as the risks that it could pose, allowing for an appropriate balance to be achieved.

We welcome the reference to the Plan or its successor and consider reference to potential future alternative plans is important for soundness given the potential for future updates or changes.

However, development sites may be able to demonstrate that any risks they generate are mitigated through other measures including sufficient alerting and shelter arrangements which will alleviate the potential impact on the authorities responding to the off-site consequences of an incident at AWE Burghfield.

In this regard, by focusing only on the Off-Site Emergency Plan rather than also allowing for alternative routes to demonstrating safety, the proposed policy wording will potentially inhibit development which could otherwise be safely occupied. The benefits which could be delivered by development, including much needed homes, could be unnecessarily foregone as a result. In the context of an identified need for housing in the Borough, we do not therefore consider that the policy is positively prepared or sound.

We therefore recommend that the policy is worded so as to allow for such circumstances by requiring that increases in population within the DEPZ will not be acceptable unless appropriate emergency plans are in place. The policy could also require pre-application engagement with Emergency Planners to ensure that safety measures are appropriately considered.

St Edward are working with Emergency Plan specialists to ensure that development at land at Green Park Village could be supported by appropriate safety measures. This will ensure that measures are in place to secure the safety of residents of the site, without adversely affecting the safety of residents of other areas of the DEPZ. We note that the Statement of Consultation following the Regulation 18 consultation

¹ Appeal Ref: APP/W0340/W/22/3312261, allowed 18th November 2024

identifies that the site is located within the DEPZ and would lead to an increased population in this area which is not considered likely to be supportable by the Off-Site Emergency Plan. However, it may be possible to develop the site in a manner which can be accommodated within the Emergency Plan. Moreover, the provision of appropriate safety measures may mean that development can be provided without creating an undue safety risk.

Policy SR4: Other Sites for Development in South Reading

Further to our comments above in relation to the spatial strategy, we support South Reading being a focus for development. South Reading is well connected to the town centre and surrounding area, with connectivity enhanced through the opening of Green Park train station in 2023. The area offers an opportunity to provide for development needs in an accessible location. Land at Green Park Village is promoted by St Edward as a site suitable for residential development in this area for inclusion in Policy SR4.

Land at Green Park Village, Flagstaff Road (Sou4)

Land at Green Park Village is a 0.24ha site that has been promoted through the Council's Call for Sites exercise. The site, shown on the submitted Location Plan (drawing reference 27429-Phase-003 Rev P1) forms part of Green Park Village located in South Reading for which planning consent was granted for a mixed-use development comprising housing, community uses, offices, retail, a primary school, health surgery, nursery, sports pitches, children's play and associated infrastructure and engineering works in 2009 (application reference 07/01275/OUT). A revised scheme was approved in 2011 (application reference 10/01461/OUT). The development is nearing completion.

The land, in the south-west of Green Park Village, was originally permitted for a multi-storey car park use associated with the recently opened Green Park train station and interchange. It has recently been confirmed by the Council that the multi-storey car park use is no longer required. As such, alternative uses for the site have been considered.

The enclosed plans (drawing references 27429-Phase-003 and 27429-Phase-003a) illustrate a residential development on the site comprising up to 50 new homes (including affordable homes), community space, open space and associated parking and infrastructure. The development will form an addition to the established and growing community at Green Park Village, benefitting from easy access to the amenities and facilities already in place as well as good transport connections to the wider area.

St Edward will utilise their unique set of placemaking and placekeeping skills to deliver a high-quality development which will complement and enhance the wider Green Park Village, helping to cement the legacy of the development.

The site is currently in use as construction compound. Development will enable a positive use of brownfield land, contributing to the wider Green Park Village and community as well as delivering much needed housing for Reading.

The site is located within Flood Zone 2 and development proposals will be designed to address the risk of flooding on site.

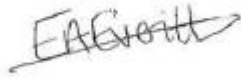
The site is located within the DEPZ. As noted above, St Edward are working with Emergency Plan specialists to ensure that any development would be supported by appropriate safety measures.

We look forward to engaging further with the Council as the Local Plan Partial Update progresses, including through participating in the examination hearing sessions.

We would be grateful for confirmation that these representations have been received and registered as having been duly made.

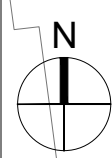
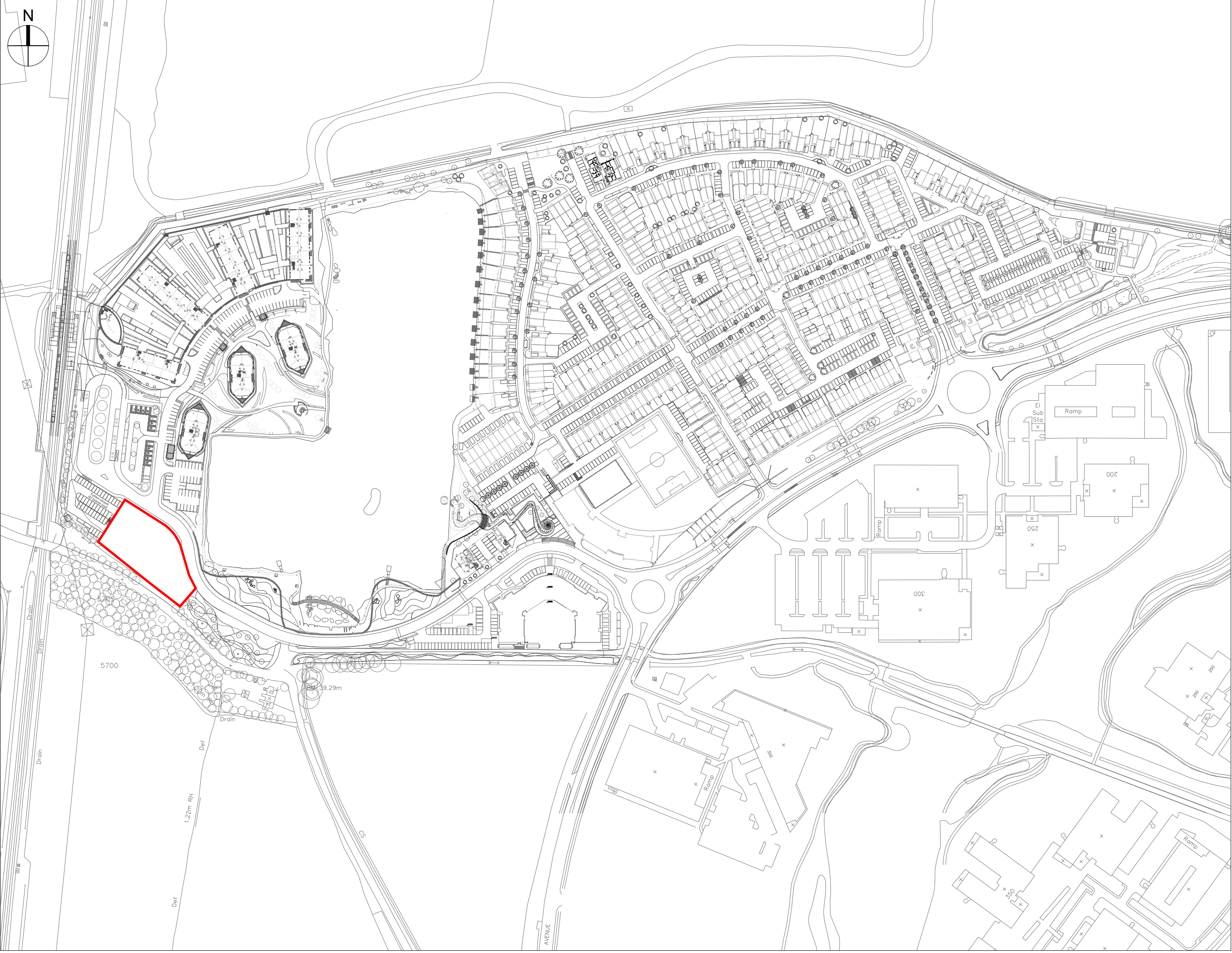
If you require any additional information or have any queries please do not hesitate to contact me at emily.everitt@stantec.com.

Yours faithfully



EMILY EVERITT
Planning Associate
STANTEC UK LIMITED

Encs: Location Plan (drawing reference 27429-Phase-003 Rev P1)
Proposed Masterplan (drawing reference 27429-Phase-003)
Proposed Masterplan - Plot Detail (drawing reference 27429-Phase-003a)



Contractors are not to scale dimensions from this drawing

The internal layouts within apartments will be subject to design development.
The precise location of walls and internal doors will be subject of non-material changes and may vary from the internal layouts set out in these plans.
These minor alterations will not affect the position and arrangement to external doors and windows nor will they affect the relative relationship between habitable rooms and windows.

The survey information shown on this drawing is based on a topographical survey prepared by a third party and Broadway Malayan Limited accept no responsibility for the accuracy or completeness of the survey.

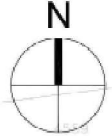
GPV

GREEN PARK VILLAGE

St Edward

Designed for life

Client		St. Edwards Homes	
Project		Green Park Village	
Description		Location Plan - MSCP Land	
Status		Preliminary	
Scale	1:2500 @A3 vp	Date	Sept 23
Site number	27429	Drawing number	Phase-003
		Revision	P1



Contractors are not to scale dimensions from this drawing

The internal layouts within apartments will be subject to design development.
The precise location of walls and internal doors and the detailed layout of bathroom and kitchen areas will be subject of non-material changes and may vary from the internal layouts set out in these plans.
These minor alterations will not affect the position and arrangement of external doors and windows nor will they affect the relative relationship between habitable rooms and windows.

The survey information shown on this drawing is based on a topographical survey prepared by a third party and Broadway Malayan Limited accept no responsibility for the accuracy or completeness of the survey.



- Key:**
- Residential (Up to 50 Homes)
 - Community Use
 - Communal Amenity
 - Play Space
 - Car Parking

GPV
GREEN PARK VILLAGE

Client
St. Edward Homes

Project
Green Park Village

Description
Proposed Masterplan

Status	Preliminary	Drawn	30 Jan 24
Scale	1:1000@A0	ML	Revision
Job number	27429	Drawing number	
	Phase - 003		

LANDSCAPING SHOWN IS INDICATIVE
SEE 'FABRIK' LANDSCAPE PROPOSALS FOR DETAILS & PBA PROPOSALS FOR INFORMATION ON LEVELS
(FULL DETAILS OF HARD & SOFT MATERIALS WITHIN 'FABRIK' DRAWINGS AND DESIGN AND ACCESS STATEMENT)





Contractors are not to scale dimensions from this drawing

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Key:

- Residential (Up to 50 Homes)
- Community Use
- Communal Amenity
- Play Space
- Car Parking

GPV
GREEN PARK VILLAGE

Client
St. Edward Homes
Project
Green Park Village

Description
Proposed Masterplan - Plot Detail

Status	Preliminary	Date	30 Jan 24
Scale	1:200@A0	Drawn	ML
Job number	27429	Drawing number	Phase - 003a
		Revision	-

Surrey County Council

Tel: 03456 009 009

Email: planning.consultations@surreycc.gov.uk

Your Ref:

Mr. James Crosbie
Assistant Director – Planning, Transport and Regulatory Services
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

By email only:
planningpolicy@reading.gov.uk



Quadrant Court
35 Guildford Road
Woking
Surrey GU22 7QQ

18 December 2024

Dear Mr. Crosbie,

**TOWN AND COUNTRY PLANNING ACT 1990
READING BOROUGH LOCAL PLAN: PRE-SUBMISSION PLAN DRAFT PARTIAL
UPDATE (REGULATION 19)**

Thank you for consulting Surrey County Council as Minerals and Waste Planning Authority (MWPA) regarding the Pre-Submission Draft Partial Update to the Reading Borough Council Local Plan.

The MWPA have no comments to make at this stage.

I trust the above is self-explanatory and helpful. However, should you have any questions or require further information please do not hesitate to contact me.

Yours sincerely,

Dustin Lees

Dustin Lees
Minerals and Waste Policy Team Leader

Swifts Local Network: Swifts and Planning Group

(Response from webform)

Title: Mr

First name: Michael

Last name: Priaux

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

To which part of the Local Plan does this representation relate?: EN12 Biodiversity (Strategic Policy)

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.

Strategic Policy EN12 Biodiversity (c) (Wildlife Friendly Design - page 58) is very welcome to implement NPPG 2019 Natural Environment paragraph 023 which specifically highlights the importance of "swift bricks", and NPPF December 2024 Paragraph 187 (d) (page 54) which states: "planning policies should... incorporate features which support priority or threatened species such as swifts";

however, there are some typos which affect clarity, and also bat bricks are mentioned - a term usually used for bat access bricks for existing buildings (e.g. search on nhbs.com to see this) - rather than the much clearer "integrated bat boxes" for new build development; also it is not currently sound because there is insufficient detail about best-practice guidance to be effective and ensure suitable location and numbers of swift bricks.

In more detail, further reasons for these changes are as follows:

Swift bricks are a universal nest brick as already stated in the Local Plan but a little further information about that would help for clarity.

Swift bricks are excluded from the DEFRA Biodiversity Net Gain metric so need a separate clear policy.

Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind.

Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>)).

Many other local authorities are including detailed swift brick requirements in their Local Plan, such as the majority of London boroughs in their draft or adopted plans including Tower Hamlets Local Plan Regulation 19 stage (Policy B04 paragraph 18.72, <https://talk.towerhamlets.gov.uk/local-plan>),

which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020,

and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a

minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;"

<https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19>),

and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4,

<https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/>),

so such an enhanced level should also be considered.

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.

There is a typo in EN12 (c) with an extra bracket - please remove the extra bracket from "(such as wildlife ponds",

and please add "and" to amend the wording to "ponds, and bird nesting and bat roosting" to make clear that the requirement to be integral within new buildings applies to bird nesting opportunities as well as bat roosting - I believe this is what it means, which would be consistent with NPPG 2019 and the reference to swift bricks, but it's currently unclear.

Please amend "bat bricks" to the much clearer "integrated bat boxes".

Please add to Strategic Policy EN12 (c): Swift bricks are a universal nest brick for small bird species and should be installed in new-build developments including extensions in accordance with best-practice guidance such as BS 42021 or CIEEM.

Also please add for information: Swift bricks are a significantly better option than external nest boxes as they are a permanent feature of the building with no maintenance requirements, improved thermal regulation, and aesthetic integration with the design.

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?: Paragraph 5.3.10.

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.

Paragraph 5.3.10. of section 5 General Policies for Central Reading (page 158) is not sound as the reference to swift boxes rather than swift bricks is inconsistent with policy EN12 (c) and also with NPPG 2019 Natural Environment paragraph 023.

Please 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 amend paragraph 5.3.10. of section 5 General Policies for Central Reading (page 158) to refer to "swift bricks" rather than "swift boxes".

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: To provide further information, if required.

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: Michael Priaulx