

Reading Borough Local Plan Partial Update Reading Borough Council response to initial questions (part 1)

July 2025

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Introduction

This document relates to the examination of the Reading Borough Local Plan Partial Update (LPPU) and contains Reading Borough Council's response to the initial questions in the letter from the Inspector of 19 June 2025. It excludes answers to IQ46, IQ47, IQ51 and IQ52 which will be provided in a document to follow by 28th July 2025.

The scope and extent of the LPPU

IQ1. Could the Council provide me with a list of all the policies and supporting text etc of the LPPU which are either new or amended as part of the LPPU? Please provide this in a table and make it clear which individual parts of the LPPU the Council considers are or are not in scope and why. Where site allocations are listed as having changed in any way (i.e. deleted, altered site capacity or requirements, or a new allocation), any previous numbers and names by which the site was known in evidence base documents should be listed.

This table is provided in Appendix 1.

IQ2. What written advice did the Council provide to representors with regard to the scope of the LPPU Regulation 19 consultation? Were there set parameters for what representors could respond to or not within the LPPU? Reference should be made to any relevant parts of the evidence base, including document, page and paragraph numbers as necessary.

A Local Plan Partial Update Pre-Submission Draft Covering Document was published as part of the list of main documents to inform Regulation 19 representors. This document is now included as an additional document reference EX007. This clearly states within paragraphs 1.2 and 2.2 which policies are within the scope of the Partial Update, but it does not explicitly state that representations on other parts of the plan would not be accepted. The Covering Document also specifies in paragraph 3.7 that representations should focus on soundness, legal compliance and compliance with the duty to co-operate.

IQ3. If representations were made to parts of the LPPU which were not subject to change, were these representations accepted by the Council as being duly made? If they were, could the Council please indicate which representor/representations these were?

All representations received during the consultation period were accepted by the Council and considered duly made. Representors that made comments on policies not within the scope (or whose representations contained some elements that were not within the scope) of the LPPU are listed below:

- AWE (H13)
- Berkshire Gardens Trust (Figure 4.1, EN1)
- BOC Limited (EN17)
- Bracknell Forest Council (H13, RL5)
- Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (OU1, WR1, WR2, CA2)
- Caversham and District Residents Association (RL1)
- CBRE Investment Management (EM4)
- Drukker, Mark (CR9)

- Ellis, Liz (WR2)
- Environment Agency (EN11, EN16, H13, CA2)
- Historic England (EN1)
- National Highways (OU4)
- Reading Friends of the Earth (CC5, CC8, EN15)
- Sharpe, John (EN15)
- Sport England (OU1, WR1, WR2)
- Thames Water (EN16)
- The Woodland Trust (EN3)
- University of Reading (H12)
- Watkin Jones Group (H12)
- West Berkshire District Council (H13)
- Wokingham Borough Council (EN15, OU1)

IQ4. Are policies in the LPPU capable of being sustained over the plan period to 2041?

Yes. New or amended policies have been drafted to be capable of being sustained over the entire plan period. Policies which are not being updated are in most cases development management policies where no need for an update or amendment to reflect potential changes over the plan period has been identified.

There are of course potential changes that could affect the ability of any policy in the plan, whether or not updated, to be sustained over the whole plan period. This was the case with the adopted plan, for instance changes to the Use Classes Order that affected the ability to apply parts of policies relating to town centres. Such changes would need to be identified at the review stage within five years of adoption, and policies amended accordingly.

IQ5. Has the List of Changes to Submission Draft [LP002] been subject to any public consultation? If so, what were the dates of consultation?

No consultation was undertaken on these changes, as they were not considered to be main modifications.

Main modifications

IQ6. In the event that I find main modifications to be necessary, does the Council wish me to recommend modifications to make the LPPU legally compliant and sound?

Yes, the Council requests that the Inspector please recommend any main modifications that would be necessary to make the LPPU legally compliant and sound.

Procedural and legal compliance

IQ7. Were all key supporting evidence base documents made available alongside the LPPU during the whole of the Regulation 19 consultation period? A list of all evidence base documents and the dates on which they were made publicly available on the Council's website should be provided to me.

The following supporting evidence base documents were published alongside the LPPU during the Regulation 19 process from 6th November 2025.

- Duty to Cooperate Statement (November 2024) (earlier version of EV001)
- Statement of Consultation following Regulation 18 (November 2024) (LP010)
- Housing and Economic Land Availability Assessment, November 2024 (HELAA) (EV015 and EV016)
- Housing Needs Assessment (EV011)
- Housing Provision Background Paper (EV012)
- Draft Infrastructure Delivery Plan (November 2024) (earlier version of EV005)

The following supporting evidence base documents were published during the consultation period, although key findings emerged and were known to the Council prior to publication (see response to IQ10).

Table 1: Publication dates of evidence during consultation

Document	Publication date
Reading Commercial Needs Assessment Volume A (Interim Draft, November 2024)	11 November 2024
Local Plan Self-Assessment Toolkits	12 November 2024
Reading Strategic Flood Risk Assessment (November 2024) Reading Strategic Flood Risk Assessment Appendices 1-8	4 December 2024
Sustainable Connectivity and Vehicle Trip Distribution Study	11 December 2024
Local Plan Viability Testing Report Draft (December 2024)	13 December 2024

IQ8. Was suitable opportunity allowed for representors to comment on the content of such evidence base documents as relevant to the policies in the LPPU during the Regulation 19 consultation?

Yes. The majority of the evidence base documents referred to above were made available for the entirety of the consultation period.

It is accepted that some documents were published towards the end of the consultation period. In the case of the Strategic Flood Risk Assessment, the most significant consultee, the Environment Agency, was provided with a draft version for their comments on 11th October, which fed into the final version.

In the case of the Local Plan Viability Testing Report, a draft version was shared with the Home Builders Federation on 5th December, giving somewhat longer for the content to be taken into account.

In the case of the Local Plan Transport Modelling, a draft of which was produced after the Regulation 19 consultation, this was shared in draft form with neighbouring authorities (South Oxfordshire District Council, Oxfordshire County Council, West Berkshire District Council, Wokingham Borough Council and Bracknell Forest Borough Council) and National Highways and an opportunity given for comment prior to it being finalised. This is detailed in the Duty to Co-operate Statement (EV001).

IQ9. Is further public consultation required prior to any Matters, Issues and Questions being issued?

No. In the Council's view further public consultation is not necessary for the reasons stated above.

IQ10. Given that parts of the evidence base were not completed and available to the Council or representatives during the Regulation 19 consultation, how has the evidence influenced the development of the LPPU?

Although some key pieces of evidence were not published in a final form until during or after the Regulation 19 consultation, the Council ensured that either a draft or initial findings from the work being undertaken would be available prior to the consultation to inform the draft of the LPPU.

- Draft conclusions from the Commercial Needs Assessment (EV006) were provided to the Council by Lambert Smith Hampton on 12th September 2024 (for retail needs) and 20th September (for employment needs). The need figures were unchanged in the draft version published on 11th November and the final version from February 2025.
- A draft Whole Plan Viability Assessment (EV004) was provided to the Council by BPS on 5th November 2024, and emerging conclusions of the report had been discussed since early October.
- A first draft of the Strategic Flood Risk Assessment (EV027) was provided to the Council by Wallingford Hydro on 27th September 2024, and a revised draft following comments provided on 10th October, which was then subsequently shared with the Environment Agency.
- The sequential approach set out in the Sequential and Exception Test (EV026) was integrated with the HELAA, which was finalised prior to the Regulation 19 consultation. It was prepared on the basis of flood risk information available at the time. Key national flood risk information on surface water and river flooding was published early in 2025 so the Sequential and Exception Test does not reflect the exact information at the time of the HELAA, but this is unavoidable.
- Initial outputs from transport evidence were provided to the Council by Stantec on 18th September 2024. This included the sustainable transport improvements identified in the Sustainable Connectivity and Vehicle Trip Distribution Study (EV017), and also noted that the initial results from the trip generation and distribution exercise indicate that it is unlikely that the level of vehicle trips generated by developments would have a severe impact or require significant highway improvements.

Therefore, the emerging outputs from these key pieces of evidence was able to inform the drafting of the LPPU.

IQ11. When does the Council intend to adopt the more recent Statement of Community Involvement?

The Statement of Community Involvement was adopted on 9th June 2025. A copy can be added to the examination library if required, but there was only one change made to the draft version already in the library (PP003), to add that the Council will notify consultation bodies of an application for neighbourhood area status (paragraph 6.24) which is not relevant to the LPPU.

Duty to co-operate

IQ12. Has the Council engaged constructively, actively and on an ongoing basis with all relevant organisations on strategic matters of relevance to the LPPU's preparation, as required by the Duty to Co-operate? What mechanisms or formal agreements have been established between authorities on cross-boundary strategic matters? Are these up to date?

Yes, the Council has engaged constructively, actively and on an ongoing basis with relevant organisations on strategic matters of relevance to the LPPU. The Duty to Co-operate Statement (EV001) demonstrates this in more depth.

The formal mechanisms and agreements on cross-boundary strategic matters are Statements of Common Ground. These have most recently been agreed with Wokingham Borough Council, West Berkshire District Council, Bracknell Forest Borough Council and South Oxfordshire District Council/Vale of White Horse District Council, which are included as appendices to the Duty to Co-operate Statement. These were up-to-date at the time of submission, and the only significant change that has happened since is the adoption of the West Berkshire Local Plan (containing the main modifications identified in the SoCG).

There has also been a wider Statement of Common Ground covering the West of Berkshire area (West Berkshire, Reading, Wokingham and Bracknell Forest) in place since 2018 and most recently updated in August 2021. This covered all cross-boundary strategic matters, but as plans within all four authorities have progressed since that time it has become increasingly out-of-date in terms of matters such as housing numbers and plan progress, and was not therefore included as part of the evidence base for the LPPU. Nevertheless, it demonstrates that the four authorities have longstanding cross-boundary joint working arrangements.

IQ13. Could the Council provide evidence relating to how the requirements of the Duty to Co-operate have been met with regard to prescribed bodies other than local authorities? Please include details of the strategic matters the Council needed to address, what was done to discharge the Duty, what was agreed and what matters, if any, are outstanding.

The Duty to Co-operate Statement (EV001) sets out how the Council has complied with the duty for all relevant bodies.

There is a long list of prescribed bodies for the purposes of Section 33A of the Planning and Compulsory Purchase Act 2004. Given the scope of the LPPU, the following were considered the main prescribed bodies of relevance to the proposed updates, with the relevant strategic matter in brackets:

- Environment Agency (strategic flooding considerations)
- Historic England (historic environment)
- Homes England (housing needs and provision)
- Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board/NHS England (strategic healthcare infrastructure needs and provision)
- National Highways

Environment Agency

Fulfilling the duty to co-operate with the Environment Agency has been around the evidence base on flood risk. A draft of the Strategic Flood Risk Assessment (EV027) was shared with the Environment Agency for their comment on 11th October 2024 and comments were received on 19th November 2024 which were then almost all factored into the final version, and a response to individual points was provided to the EA on 4th December.

Historic England

A duty to co-operate meeting was held with Historic England on 2nd July 2024 which covered a variety of matters relating to the update including the interplay of heritage and sustainability policies, heritage issues of certain sites and design matters. A further meeting was held on 24th June 2025 to discuss the potential for a Statement of Common Ground, and a draft of this Statement was sent to Historic England for their comment on 10th July.

Homes England

The Council sought to engage Homes England in the work around need for housing in Reading. Homes England were invited to the stakeholder workshop that was held on 19th March 2024 to discuss the methodology and emerging findings from the Housing Needs Assessment but did not attend. A copy of the draft Housing Needs Assessment was sent to Homes England among other stakeholders for comment on 25th July 2024, but again no comments were received.

Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board/NHS England

In terms of the NHS, the Council has generally liaised with the main bodies dealing with services in the local area, i.e. the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board for primary care and the Royal Berkshire Hospital Foundation Trust for acute care. Extensive engagement has been carried out with these bodies and this is detailed in paragraphs 2.7.2 to 2.7.5 of the Duty to Co-operate Statement. Outcomes included the inclusion of policy CC10 on health impact assessments, the identification of opportunities for primary care provision on sites CR11d, CR12a and CR13c and the changes to policy ER3 on the Royal Berkshire Hospital.

National Highways

National Highways were provided with a draft of the Transport Modelling report (EV018) as soon as it was available, on 14th April 2025. Comments were received on 30th April, and these were factored into the final version of the modelling. Further comments were received on 22nd May relating the Junction 11 of the M4 (see Appendix 5), and the Council is working

with its consultants to address these comments with a view to preparing a Statement of Common Ground.

No representations have been received that suggest that the Council has failed to comply with the duty to co-operate with any prescribed bodies other than local authorities.

IQ14. With regard to housing need, requirement and supply, who has the Council engaged with and how has this been undertaken? What inter-relationships are there with other authorities in respect of the housing market, commuting, migration, and infrastructure provision? How have the above matters been addressed through co-operation, including the housing requirement? What specific outcomes are there? Please make specific reference to any relevant documents, such as Statements of Common Ground.

With regard to housing need, the engagement with duty to co-operate bodies took place primarily through the production of the Housing Needs Assessment. An online workshop was held on 19th March 2024 to which all duty to co-operate partners for which housing needs and provision was identified as a strategic matter were invited. Eight authorities attended¹. The workshop presented the methodology and draft conclusions of the HNA. The full draft report was also shared with the same bodies that were invited to the workshop, for their comment.

Housing provision was based on the HELAA, which used a methodology agreed jointly with other former Berkshire authorities (other than Bracknell Forest, which uses its own similar methodology). As such, the figure that emerged was informed by co-operation with neighbouring authorities.

Identified housing needs and the approach to provision, including the emerging capacity figure from HELAA work, was also discussed in duty to co-operate meetings held with authorities closest to Reading, including all immediately adjoining authorities. Relevant meetings are listed in Appendix 2 of the Duty to Co-operate Statement.

The Berkshire (including South Bucks) Strategic Housing Market Assessment 2016 that informed the adopted Local Plan considered the functional relationship of the area in order to define housing market areas. It came to the conclusion that Reading sat within a Western Berkshire Housing Market Area together with West Berkshire, Wokingham and Bracknell Forest. This is shown in Figure 1.

¹ Bracknell Forest Borough Council, Buckinghamshire Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, South Oxfordshire District Council, Vale of White Horse District Council, Wokingham Borough Council

HMA's

- Eastern Berks and South Bucks
- Western Berks

- 75-78% self-containment of migration flows (excluding long distance moves)
- 69-70% self-containment of commuting flows; and
- House price analysis showing a clear link between the four Western Berkshire authorities.

It was identified that Reading had both statistically significant commuting relationships and migration relationships with Wokingham and West Berkshire. These are the two authorities with which Reading has the closest relationship, unsurprisingly given that these two authorities cover part of the wider Reading urban area.

In terms of infrastructure provision, the strongest relationships are with Reading's three immediate neighbours, including on cross-boundary transport provision including park and ride and cross-Thames travel, given the need for facilities serving Reading to be outside the

Borough boundaries, and on education, particularly secondary education as there are significant cross-boundary movements, and higher education as the University of Reading main campus straddles the boundary between Wokingham and Reading.

The specific outcomes of the duty to co-operate are that the authorities with which Reading has the closest relationship (Wokingham, West Berkshire, South Oxfordshire and Bracknell Forest) raise no fundamental concerns with the LPPU approach to key strategic matters, and in particular to housing need and supply. This is set out in the relevant statements of common ground as follows:

- South Oxfordshire District Council/Vale of White Horse District Council (Appendix 5 of EV001) – paragraph 4.14
- Wokingham Borough Council (Appendix 6 of EV001) – paragraph 4.8
- West Berkshire District Council (Appendix 7 of EV001) – paragraph 4.9
- Bracknell Forest Borough Council (Appendix 8 of EV001) – paragraph 4.9

IQ15. Have signed Statements of Common Ground now been secured between the Council and all relevant parties? Are there any significant concerns expressed by interested parties regarding the Duty to Co-operate which remain a matter of dispute?

The Council prioritised Statements of Common Ground with adjoining authorities, which were signed prior to submission and are contained in the Duty to Co-operate Statement (EV007).

The only additional Statements of Common Ground that are intended to be progressed with duty to co-operate partners are with Historic England and National Highways.

The Council met with Historic England on 24th June and discussed the content of a potential SOCG. A draft was prepared and provided to HE on 10th July for comment and amendment. It is expected to be signed during July.

The status of a SOCG with National Highways is set out in answer to IQ38.

There are no significant concerns from duty to co-operate partners regarding discharge of the duty that remain a matter of dispute.

There are concerns from other parties, namely the Home Builders Federation, Gladman and USS Investment Management Ltd, summarised in paragraphs 3.1.4 to 3.1.6 of the Duty to Co-operate Statement, which the Council does not consider constitutes a failure of the duty and therefore remain a matter of dispute.

Sustainability appraisal

IQ16. Please provide the Sustainability Appraisal Scoping Report (2014) and explain why a new separate scoping report was not published as part of the LPPU process.

The Sustainability Appraisal Scoping Report (September 2014) is provided as EX008. Section 3 of the Sustainability Appraisal of the Local Plan Partial Update Pre-submission Draft (LP005) explains why a new scoping report was not needed as part of the LPPU process due to the fact that Scoping Report remains reasonably up-to-date. Paragraph 3.4 considers elements which have changed since the Scoping Report and considers their implications in turn.

IQ17. Has the Sustainability Appraisal adequately addressed all changes made to the LPPU, particularly in respect of site allocations?

Yes. The Sustainability Appraisal considered each site and policy change in turn against the 20 objectives. The proposed changes to specific sites are assessed, as well as a “retain as existing” option alongside reasonable possible alternatives.

Habitat Regulations Assessment

IQ18. Can the Council confirm how the recommendations of the Habitats Regulations Assessment have been taken into account in the LPPU?

The Habitat Regulations screening assessment process is integrated into the Sustainability Appraisal process. As detailed in paragraph 5.16 of the Sustainability Appraisal of the Local Plan Partial Update Pre-Submission Draft (LP005), Objective 8 screens each policy and site for a Habitat Regulations Assessment. A summary of the impacts on the designated sites of each policy is included in Appendix 4. A Full Habitat Regulations Screening Table Reg 19 (LP012) includes a full screening assessment, a summary of the findings and a brief discussion of implications (paragraphs 8 – 12). This has been included as a separate item as it was not included within the published Sustainability Appraisal report at Regulation 19 stage, although a summary of the impacts was included.

In short, there would be no significant effects on internationally-designated wildlife sites from any of the options that make up part of the LPPU that needed to be taken into account. One alternative option (not to update policy TR2) did result in a potential significant effect, but this is not the proposed plan approach.

Housing

Housing need and requirement

IQ19. What efforts have been made to address unmet need using the relevant standard method in line with the Framework?

The Council's considers that there is no unmet housing need.

Even if the standard method in the December 2023 NPPF were used, at the time of submission and at the current time there is no unmet housing need, as set out in the Housing Provision Background Paper Addendum (EV013), as the December 2023 standard method results in a figure of 822 per year compared to the figure of 825 per year in policy H1.

At the point of publication of the Pre-Submission LPPU, the standard method would have resulted in a figure of 878 per year, which if it formed the basis for the LPPU would have meant an overall unmet need of 954 dwellings in total over the plan period.

Reading is one of the 20 cities and urban centres to which the urban uplift in the standard method applied at the time. Paragraph 62 of the NPPF states that

“This uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework”

Once it had been established that there was no scope for increased housing supply within the Borough (which is examined in section 5 of the HELAA, EV015), there would therefore have been a need to seek voluntary cross boundary redistribution arrangements or demonstrate conflict with policies in the Framework.

As summarised in the Duty to Co-operate Statement (EV001), on 23rd August 2024 the Council wrote to all local planning authorities within 10 km of the Borough boundaries to understand the scope for accommodating a theoretical unmet need should the plan rely on the standard method. Eight of the nine authorities contacted responded, and no scope was identified to accommodate any of this potential need. It is therefore considered highly unlikely that a voluntary cross boundary redistribution arrangement would have been possible.

As a result, the Council would have needed to demonstrate how accommodating the full need for housing would have conflicted with policies in the Framework. This is evidence which would have need to be provided at submission stage, but the HELAA would have formed the basis for it, as it would need to be a site by site consideration. There are only a limited number of options for accommodating higher levels of residential development in Reading, mainly including increasing densities, using employment land or remaining undeveloped land or developing on areas at higher risk of flooding. The likely content of such evidence would have therefore included demonstrating that:

- Further loss of employment land would prevent Reading from meeting its assessed needs for employment uses (including NPPF paras 11 a), 85-86);
- There would be unacceptable loss of remaining undeveloped land, which mainly consists of recreational public open space, allotments, important habitats and land at high risk of flooding (including paras 102-103, 180 a), 185 b)).
- There would be development within areas at the highest risk of flooding, including Flood Zone 3b (including para 165).
- The increase in densities would have an unacceptable impact on the surrounding local character (including para 135).

IQ20. Could the Council explain what the exceptional circumstances are for deviating from the standard method for calculating housing need?

The exceptional circumstances for deviating from the standard method are set out in the Housing Provision Background Paper (EV012). They are summarised briefly below.

The principal exceptional circumstance identified is a demographic one in that the standard method produces results that are particularly flawed for Reading. This is set out in detail in Appendix A of the Housing Needs Assessment (EV011). There was a particularly high level of Unattributable Population Change (UPC) in Reading between 2001 and 2011, the fourth highest level outside London, which led the 2014-based household projections underestimating the level of migration to Reading and therefore the projections being too low. This means that applying the first three stages of the standard method creates a result that is too low for Reading, and that application of the urban uplift that creates a result that is too high, a situation which is an exceptional circumstance.

The other exceptional circumstance relates to the particular circumstances of Reading in the list of urban uplift authorities, in that it is by some distance the smallest authority outside

London both in terms of spatial area and population to which the uplift applies, and as a result it is the authority for which the largest proportion of its urban area falls outside its boundaries, which restricts the ability to meet uplifted need within Reading's boundaries, and due to the wording of the NPPF requiring voluntary cross-boundary agreements makes delivery of the standard method need highly unlikely.

IQ21. What is the justification for taking a capacity-based approach to the housing requirement?

Reading can only deliver the amount of homes which there is capacity to deliver. This is the approach that was taken in the adopted Local Plan, and continues to be the approach.

Since Reading is a geographically small, compact authority that is already heavily built up and where potential development sites are limited, it is possible to formulate a robust understanding of how many homes Reading has the capacity to deliver. This is achieved through the HELAA (EV015). The Council is confident that the HELAA is reflective of the true capacity for residential development in Reading.

It is understood that, although Reading's own locally-assessed needs are being met, national policy aims to significantly boost the supply of housing (NPPF paragraph 60). Reading contains brownfield sites that are highly accessible by public transport, walking and cycling, and therefore if Reading is in a position to deliver housing over and above its locally-assessed need that can make a contribution to boosting supply, it should do so. This is the reason that the housing requirement is based on the capacity figure rather than the locally-assessed need figure.

IQ22. Given that the sites within the LPPU have a minimum and maximum capacity range, what assurance can the Council provide that the housing requirement would be met?

The allocated sites in the LPPU include a range which relates to the indicative capacity of the site. Relevant parts of the supporting text make clear that this will need to be addressed at application stage depending on detailed design and layout.

The approach to allocated sites is a reflection of how development frequently takes place in Reading. Particularly on large town centre sites, sites can go through a variety of changes with significant alteration of the number of homes before development actually begins. On complicated brownfield sites, issues may arise when the site is considered in more detail at application stage that also affect the capacity. Too inflexible a figure would in many cases potentially provide an obstacle to development taking place.

As the housing requirement is based on the total of sites identified in the HELAA, the alternative would be to use the HELAA figure (generally the midpoint of the range, as the ranges are generally arrived at by using +/- 20% of the HELAA figure) as a minimum. However, this would be unduly inflexible as these are often complex brownfield sites and it is not possible for the HELAA methodology to have picked up every issue that will inform the design, layout and ultimately capacity of the site. Applying the HELAA figure as a minimum could therefore actually create an obstacle to the site being delivered.

The above is why the HELAA has variance rates built into it, to reflect the possibility of sites not coming forward or being delivered with a dwelling number that differs from the allocation. Paragraphs 3.33 to 3.27 of the HELAA (EV015) set out how these have been arrived at for different types of site, but for allocations that do not already have a planning permission, a

36% or 42% reduction on the assumed delivery of the site is applied depending on whether or not the site is in the town centre. This is based on previous experience of the rate of allocations coming forward over a plan period, using allocations that were identified on a similar basis to the current allocations, with an indicative dwelling range. This means that the potential for some sites to deliver at the lower end of the range specified is already factored into the housing requirement calculations.

It is the Council's experience in Reading that developers generally seek to deliver towards the higher end of the range as a starting point. This can be seen in the responses of landowners to sites at Regulation 19 stage. The same approach has been used for housing allocation since the adoption of the Reading Central Area Action Plan in 2008, including in the adopted Local Plan, and the Council has not so far encountered the kind of consistent under-provision against set ranges that would impact the ability to deliver the housing requirement.

If every site for which a range has been specified, excluding those where permission or a resolution to grant permission exists, total delivery over the plan period would reduce from 14,850 to 13,667 homes, which equates to 759 homes annually. Therefore, even in this extreme scenario that is almost inconceivable, housing delivery would remain above the locally-assessed need.

Should such under-delivery on allocated sites become a regular occurrence, it should be picked up as part of the five-yearly review of the plan, and policies would need to be amended accordingly.

IQ23. Should the LPPU set out any requirement for designated neighbourhood areas in line with paragraph 67 of the Framework?

There are no designated neighbourhood areas in Reading, and there are no current proposals to establish such areas. Whilst there is a small possibility of such areas being established during the plan period, as Reading contains no towns or parishes it is not possible to anticipate which areas they would cover or what their boundaries would be. As such the LPPU cannot set a housing requirement for neighbourhood areas.

Housing supply, including site selection process

IQ24. Were all sites in the 2017 HELAA where development has not been completed reassessed fully using the 2024 methodology?

Yes.

IQ25. What underpinning work informed the change in the site capacity ranges for the majority of site allocations within the LPPU?

Appendix 2 includes a table setting out the main reasons for the change in dwelling ranges for every relevant site allocation.

Frequently, the changes in site capacity ranges are due to changes in assumptions made within the HELAA, based on most up-to-date information on planning permissions.

Paragraphs 3.3 to 3.13 of the HELAA (EV015) describe how development potential was assessed, and this is in most cases the reason for the change, albeit some sites were adjusted through the suitability stage in particular based on individual conditions on the site.

Appendices 3 and 4 of the HELAA includes all the sites that have been taken into account to arrive at these updated assumptions. Some of these were also taken into account in arriving at the 2017 HELAA assumptions, but clearly there had also been several years of new permissions to take into account.

The difference in the assumptions between the 2017 and 2024 versions of the HELAA are set out in table 2 below.

Table 2: Comparison of assumptions in 2017 and 2024 version of the HELAA

Assumption	HELAA 2017	HELAA 2024
Pattern book density – town centre	325 dph	327 dph
Pattern book density – town centre fringe	200 dph	N/A
Pattern book density – urban	74 dph	112 dph
Pattern book density – suburban	42 dph	43 dph
Pattern book – conversion to residential (floorspace per 1 dwelling)	57 sq m	64 sq m
Site-by-site calculation – new-build floorspace per 1 dwelling	94 sq m	90.4 sq m
Site-by-site calculation – plot ratio for larger sites	43%	43%
Site-by-site calculation – plot ratio for smaller sites	66%	64%

Most assumptions are relatively similar. However, there is a substantial increase in the pattern book density for urban sites due to the densities that have been achieved in such locations in recent permissions. In addition, the town centre fringe figure was removed, and instead a town centre figure applied to all such locations. This is because the information on densities achieved in permissions set out in table A3.1 in Appendix 1 of the HELAA did not justify such a distinction, with town centre fringe sites such as 115 Chatham Street and Thames Quarter achieving among the highest densities. Therefore, allocations in urban and town centre fringe locations have among the larger increases in the LPPU.

There are also a number of other reasons that frequently inform the changes, including:

- New planning permissions or resolutions to grant permission on all or part of the site that demonstrate that the site can accommodate a larger or smaller number of dwellings;
- The changing character of surroundings informing an amended approach, either through applying a different pattern book density or through changes to the site-by-site assessment;
- Removal of areas for a treed corridor (as identified in the 2020 Tree Strategy) often reducing the dwelling total.

The HELAA itself contains the full evidence for why each dwelling range has been arrived at. The table in Appendix 2 identifies how the allocations correspond to sites in the HELAA.

IQ26. What evidence is there to substantiate the deliverability and/or developability of the sites comprising the housing supply and the estimated timeframes for their completion?

Paragraphs 3.39 of the HELAA (EV015) summarise how the conclusions on deliverability and developability have been reached.

As explained in paragraph 3.19 of the HELAA, the Council wrote to most landowners of HELAA sites in August 2024 to gain an understanding of availability and achievability of development. The questions asked at this point covered the following:

- Likelihood of site becoming available
- Any additional land required
- Need to relocate any uses
- Landowner willingness to develop or sell site
- Legal or ownership constraints
- Approximate timescale for site becoming available
- Approximate residential build out rates
- Known abnormal development costs
- Issues outside the landowner's or developer's control
- Any reliance on external funding
- Particular viability issues
- Prospect of the site being delivered for proposed uses in the plan period.

Where a response has been received, the information provided is summarised in the Availability and Achievability tabs of the HELAA Detailed Tables (EV016).

As noted in the HELAA, the response rate is low, at around 20%. It is not unusual that a limited response is received from such contacts, but it does mean that the Council has often had to rely on other information. For a large number of sites, there is information available that can guide a judgement on deliverability or developability from one or more of the following sources:

- A current or recent planning application;
- An ongoing or recent pre-application enquiry;
- The response to the call for sites;
- Internal discussions for Council-owned sites, of which there are a number;
- Land auctions.

The Council has sought to link all the evidence around development timescales together – i.e. the HELAA, implementation chapter of the LPPU, housing trajectory and five year housing land supply. For this reason, the Council has borne in mind the definition of 'deliverable' in the glossary to the NPPF, and in general it is only sites with full planning permission, or a resolution to grant full planning permission subject to Section 106, that are included in the deliverable category and the first five years of supply (2024-2029). Some sites with hybrid permission (i.e. part in full, part in outline) are also included as 'deliverable', although only those elements that are permitted in full are included in the first five years of delivery in the trajectory.

In terms of 'developable' sites, these are generally those where it is known that the site is likely to be available for development in the plan period (either through a response through the HELAA process or from other discussions around the site) and there are no known achievability issues.

A number of sites are considered 'potentially developable'. These are often sites where landowner intention is less clear, but the information known to the Council indicates that development has a realistic prospect of occurring during the plan period.

Experience in Reading is that landowner intention can change quite quickly, and sites can come forward unexpectedly quickly or can remain undeveloped for much longer than expected, or can come forward for an entirely different use than anticipated. In addition, a limited specific response to contacts about availability and achievability of sites is not a new issue in Reading. This is why it is important here that the evidence builds in non-implementation rates, which are referred to as variance rates in the HELAA to also encapsulate changes in the amount of homes that sites ultimately deliver. For sites without a permission or resolution to grant permission and where there is no confirmation of the intention to develop, these rates are quite significant, at 42% in the town centre and 36% outside the town centre, based on evidence of past delivery over a plan period. This means that the Council can have some confidence that changes on individual sites should be accounted for in the overall numbers.

IQ27. Why are confidential sites assessed in the HELAA and how does this comply with the requirement of the Planning Practice Guidance that the assessment is made publicly available in an accessible form? How can I as the examining Inspector reasonably consider such sites if they are unmapped and given only opaque names without site addresses?

The confidential sites are those that we are only aware of because a pre-application enquiry, undertaken on the basis that it would be confidential, has been made. These are assessed in order to give as thorough a picture of capacity in Reading as possible. As shown in the HELAA, the vast majority of confidential sites were not considered suitable, which is why in many cases they were not taken further to a planning application. It was not therefore considered appropriate to identify the sites. This approach was also used in the 2017 version of the HELAA, and no concerns were raised at the examination regarding this matter at that time. Although Planning Practice Guidance states that "The assessment will need to be made publicly available in an accessible form", the Council considered that this relates to the assessment as a whole not to every possible site.

However, if it is considered necessary the Council can go through the list and ascertain in each case whether it is possible to name the site and give further details, taking into account the view of the pre-applicant if the organisation still exists where necessary.

IQ28. Please supply any further supporting information/technical work available relating to the suitability, availability and deliverability of the proposed allocations, for example, draft masterplans, technical reports and other evidence.

There is very limited additional technical work that has been used to support these conclusions, and no masterplans or specific technical reports other than what has already been submitted. The reasoning for the conclusions on development capacity and suitability of the sites is set out within the HELAA itself. Information on deliverability is discussed in answer to question IQ26.

However, there are some additional pieces of information that were taken into account in relation to the sites that have been nominated for development.

Firstly, the responses that were submitted to the call for sites exercise that was undertaken in April 2023 are available. These have been added to the Examination Library as EX005. These sometimes cover existing allocations where information has been submitted at call for sites stage.

Secondly, the site visit information forms completed by officers for all sites nominated during the call for sites or through the consultation process are now included in the Examination Library as EX006. It is worth noting that these forms do not represent the entire consideration of suitability under the HELAA, and were an input to the desk-based suitability assessment. Other issues and considerations were often identified as part of the suitability assessment.

IQ29. Provide a list of all housing sites (for all types of housing) submitted by representors which have not been included in the LPPU ('omission' sites). The list of omission sites should be provided with a plan of each site with it clearly outlined and seen in the context of named roads.

Seven sites within Reading Borough were submitted during the call for sites exercise and are not draft allocations in the LPPU. These were all included in the Consultation on Scope and Content document under Regulation 18 (LP008) as potential allocations and further detail including plans is contained in Appendix 2 of that document. For ease of reference, a summary is included below including HELAA references, and plans are in Appendix 4.

Table 3: Housing omission sites

Site	Nominated use	Reg 18 ref	HELAA ref
Crowne Plaza Reading, Richfield Avenue	Mix of uses through the full or partial redevelopment for hotel (Class C1) with ancillary food and beverage offering (Class E), major residential (Class C3), care home (Class C2) and/or electric vehicle charging station/garage (Sui Generis).	Cen4	TH030
Royal Court, Kings Road	<i>[As part of same site as Sapphire Plaza which is proposed to be allocated]</i> Residential development of 250-400 dwellings (215-365 net gain) and around 3,000 sq m of commercial space.	Cen9	AB085
Tunbridge Jones. Cradock Road	Residential development of 72-96 dwellings	Sou2	KA034
Site at Green Park Village, Flagstaff Road	Residential development of 50 dwellings including affordable housing	Sou4	WH053
2 Hexham Road	Residential development	Sou5	RE019
Land west of Millford Road	Residential development of around 70 dwellings	Wes1	TH040
Land at 9 Upper Crown Street	Residential development of around 46 dwellings	Eas1	KA033

Of the sites above, at the time of preparing the Regulation 19 draft, 2 Hexham Road and Land at 9 Upper Crown Street had planning permission or a resolution to grant permission

and are included in the LPPU in the relevant lists under paragraphs 6.3.17 and 9.3.6. They were not taken forward as allocations for that reason. 2 Hexham Road is now under construction.

Two adjacent sites within South Oxfordshire District were submitted at the call for sites stage for residential development for a North Reading Extension with potential for 800 to 1,200 homes, as follows:

- Land east of Caversham Park Road, Playhatch
- Land off Peppard Road.

These out-of-Borough sites were not consulted upon as part of Regulation 18 as it is not within the LPPU remit to allocate sites outside Reading. Details of these sites can be found in the representation of their promoter, Gladman, in the Regulation 19 responses (LP007).

No sites that were proposed through the Regulation 18 or 19 consultations have been omitted from the LPPU.

IQ30. Would at least 10% of the housing requirement be accommodated on sites no larger than one hectare? If so, how would that be achieved?

Yes. 35% of the total housing requirement would be accommodated on sites of less than 1 hectare.

The full basis for this calculation is in Appendix 3.

The following has been assumed in making this calculation:

- The figure for each site is the final figure from the HELAA (EV015) after variance rates are applied, which almost always equates to the mid-point of the range expressed in the draft policy. The HELAA figures were the basis for calculating the housing requirement.
- A sub-area in a Major Opportunity Area is considered a 'site' for these purposes but not the full Major Opportunity Area (unless it has no sub-areas, as for SR2 and SR3).
- All small-site windfalls are assumed to be under 1 ha.
- All other allowances (i.e. the local authority new build allowance) are assumed to be over 1 ha – in practice, some of these sites are also likely to be under 1 ha.

If the calculation is restricted to site-specific supply only (i.e. excluding small site windfalls and other allowances), 22% of the requirement would be on sites of less than 1 hectare.

IQ31. To assist with my consideration of housing supply, I require a detailed housing trajectory over the plan period which takes account of all sources of supply. This should be in an Excel format.

This has been added to the examination library as EX003.

Student accommodation

IQ32. Please can the Council explain how student accommodation needs would be met over the plan period?

The adopted Local Plan was examined at a time that the University of Reading had stated intentions for significant expansion that would have resulted in 5,000 additional students

between 2018 and 2028. However, the only recognised need for purpose-built student accommodation (PBSA) in the adopted Local Plan is the 1,000 bedspace shortfall in meeting the first year guarantee, and this remains the case. Reference to the 5,000 students not housed in PBSA in the supporting text was not considered part of the need because there has never been any evidence on how many of these students would want or need to be in such accommodation and how many would wish to continue living independently.

The Housing Needs Assessment (EV011) examined the issue of need for student accommodation but came to the conclusion that there is no clear evidence that any further provision of PBSA is required in Reading over and above the 1,000 bedspaces. The expansion plans that were in place during the Local Plan examination in 2018 were related to government policy on higher education at the time and no longer appear to be part of the UoR's plans. The Council has been awaiting the final publication of a new Estates Strategy for the UoR, but nothing in recent information provided by the UoR suggests significant growth plans.

In the absence of firm expansion plans by the UoR, the Council examined Higher Education Statistics Authority (HESA) data as part of the Local Plan Review (LP011, see paragraphs 3.462 to 3.469). It showed that student numbers at the UoR had grown by 14% between 2017 and 2022, but that this was driven by postgraduate part-time students with full-time student numbers slightly decreasing. It is full-time students that are far more likely to require accommodation, and there is therefore no indication of an increasing need for PBSA since the Local Plan was adopted.

In terms of meeting the need, the Council's position is that this should be met on or adjacent to existing campuses or as an extension or reconfiguration of existing student accommodation, as set out in Policy H12.

Looking specifically at the figures, the allocated site at St Patrick's Hall (ER1e), on UoR land, would deliver an additional 450-500 bedspaces. In addition, 38 bedspaces of PBSA were completed in 2024/25 on the former Woodley Arms on Waldeck Street, whilst 34 bedspaces at 177 Basingstoke Road remain under construction.

This would mean a remaining need of 428 to 478 bedspaces, and the Council considers that there is considerable scope for making better use of the existing Whiteknights Campus to provide such accommodation. The UoR undertook a Campus Capacity Study in September 2018 which identified scope for 25,000 sq m of academic floorspace and 1,281 new student bedrooms² on university land, mainly on Whiteknights Campus. The Council's view at the time based on looking at the individual sites considered was that this was likely to be something of an overestimate of total capacity, but also that the UoR had prioritised the delivery of academic floorspace, with there being no clear reason why most of the sites identified as suitable for academic floorspace might not also be suitable for student accommodation. In any case, the information clearly demonstrated more than adequate potential to deliver PBSA to meet the remainder of the 1,000 bedspace need. Very little development has occurred on the UoR campuses since the Local Plan was adopted other than the new School of Art, which in any case is on a site not identified in the Campus Capacity Study, and so it is not considered that this conclusion would have changed.

² The study found a capacity of 1,935 bedrooms, but 654 of these were on St Patrick's Hall, so these have been excluded to avoid double-counting.

Provision for Gypsies, Travellers, and Travelling Showpeople

IQ33. Has the Council produced any relevant up-to-date evidence base for gypsies, travellers and travelling showpeople's accommodation needs? If this exists, it should be provided to me. If not, I require an explanation as to why no evidence base has been produced and why no provision has been made within the LPPU.

The most recent evidence is the Gypsy, Traveller, Traveling Showpeople and Houseboat Dweller Accommodation Assessment of June 2017 which is referred to in paragraph 4.4.108 of the LPPU.

The Local Plan Review (LP011) in March 2023 considered each policy in turn and identified whether there was a need for an update. It came to the conclusion that policy H13 and the associated identified need did not require an update, and as such the policy was not part of the scope of the LPPU. It is not identified as being in scope within the LDS (PP001). As such no update of the assessment has been carried out.

The circumstances around gypsies and travellers in Reading have not changed significantly since the Local Plan was adopted. Other than a planning application by the Council for a transit site to meet the identified transit needs, which received planning permission on 10 March 2023 (ref PL/21/2037), but is not expected to be built out due to the costs and technical difficulties of the site, there have been no applications or pre-application enquiries for gypsy, traveller and travelling showpeople accommodation since the Local Plan was adopted. No sites were nominated for development as part of the call for sites or during consultation that would have included gypsy, traveller or travelling showpeople accommodation.

The Council has continued work on identifying possibilities for gypsy and traveller provision using its own land, but no additional potential sites have been identified beyond the 80 Council-owned sites that were assessed as part of the background evidence for the now adopted Local Plan, and none of the sites assessed at the time have become potentially available for this use. Given the lack of private land available for such a use, there is not considered a realistic likelihood that a site would be able to be identified in an updated plan at this stage.

IQ34. Do the changes made to the definition of gypsies and travellers set out in the PPTS have any implications for the Council's most recent needs assessment?

The 2017 Assessment resulted in identification of a permanent need (10 pitches) and a cultural need (17 pitches) for new accommodation. The cultural need as modelled in that assessment was based on those identifying as a gypsy and traveller ethnicity, including those in bricks and mortar accommodation, that would prefer to live on a pitch.

Changes in the PPTS since 2017 were made in December 2023 and December 2024 that affected the definition of gypsies and travellers.

The 2023 change reverted to the definition of gypsies that predated PPTS 2015, i.e. including in the definition those who had ceased to travel permanently on grounds of their own or their family's or dependants' educational or health needs or old age.

The 2024 change further widened the definition to include all other persons with a cultural tradition of nomadism or of living in a caravan.

The changes would have impacted the conclusions of the assessment in that the PPTS need of 10 permanent pitches would not be relevant. However, the 'cultural need' of 17 pitches which forms the upper extent of need would still be relevant. Although the identification of those identifying as a gypsy and traveller ethnicity in the Assessment is not an exact match for the culturally-based definition as of December 2024, in practice for the purposes of identifying households with which to conduct interviews it is unlikely to make a significant difference to the overall conclusions.

The Council therefore considers that an amendment to the first bullet point of paragraph 4.4.108 to note that the 2017 assessment found a cultural need of 17 permanent pitches and removing reference to 10 pitches would be a factual update and potentially therefore a minor modification.

IQ35. Has the Council undertaken any assessment of the needs of houseboat dwellers? If no assessment has been undertaken, why is this the case?

The most recent assessment is the Gypsy, Traveller, Traveling Showpeople and Houseboat Dweller Accommodation Assessment of June 2017, which found no emerging need from houseboat families and made no recommendation to seek additional moorings based on evidence available. There are no known significant changes since that date that would indicate a need for a new assessment at this stage.

Employment

IQ36. Provide a list of all employment sites submitted by representors which have not been included in the LPPU ('omission' sites). The list of omission sites should be provided with a plan for each omission site with the site outlined and seen in the context of named roads.

No sites that were proposed for employment development at call for sites, Regulation 18 or Regulation 19 stage have been omitted from the LPPU other than Royal Court, Kings Road, which formed part of a larger site for which a mixed use residential and commercial allocation was proposed. Please see the answer to IQ29 and Appendix 4.

The site at 132-134 Bath Road, forming draft allocation WR3u, was initially submitted at call for sites stage for either a residential development or a mixed use commercial and residential development. Subsequent discussions with the promoter identified that residential development was the preference, and the site is proposed to be allocated for that purpose given its location a significant distance from any Core Employment Areas and adjoining residential land.

Transport

IQ37. Did National Highways have access to transport modelling documents [EV018 – EV022] during the Regulation 19 consultation? If not, why not?

No. National Highways were provided with the transport modelling documents for their comment as soon as they were provided to the Council, which was on 14th April 2025. This was after the Regulation 19 consultation. As set out in the Duty to Co-operate Statement (EV001), the Council gave two weeks for comment but also National Highways (and others) to let the Council know whether further time would be required. National Highways'

comments were provided on 30th April, and the modelling document was revised to address these comments.

IQ38. What progress has been made on production of a Statement of Common Ground with National Highways?

After production of the final Transport Modelling, which had taken initial comments from National Highways into account, National Highways provided further comments on 22nd May, which are included as Appendix 5.

Although these comments identify that there are no concerns about the impacts on Junctions 10 and 12 of the M4, there are still some outstanding issues related to Junction 11, arising particularly towards the end of the plan period. These comments have been provided to the Council's consultants Stantec to consider further, and the Council's intention is to seek a Statement of Common Ground with National Highways when these points have been further addressed.

IQ39. What consideration has been given to previously allocated housing sites with increased capacities, new site allocations, and employment provision in the modelling? What will the implications of the LPPU's spatial strategy be for the strategic road network?

The Transport Modelling takes into account all allocated sites for residential and for other uses including employment in the LPPU, and this covers both new site allocations and any changes on existing site allocations, together with an allowance for windfall development. Appendix B to the transport modelling report (EV020) sets out the differences between the Local Plan scenario and the reference case, and it shows both new sites and net change on existing sites. These figures are taken from the HELAA.

The strategic road network in and around Reading consists of the M4 motorway including the junction with the A329(M) (Junction 10). Implications in terms of changes in flow between the reference case and the Local Plan are shown in the Transport Modelling report (EV018) on figure 4.1 (for the AM peak) and 4.2 (PM peak) in overall terms.

For the AM peak increases in flows on the M4 are identified as follows:

- 41 trips westbound from Junction 11
- 29 trips eastbound from Junction 11

For the PM peak increases in flows on the M4 are identified as follows

- 55 trips eastbound from Junction 11

Table 4.1 in the Transport Modelling identifies those junctions that are over capacity in either the reference case or Local Plan scenarios. The only junction identified as being over capacity that is part of the strategic road network is the M4 Junction 11 westbound onslip, which has a volume-capacity ratio in the PM peak of 101% in the reference case, slightly increasing to 102% in the Local Plan scenario. This is considered to be a marginal increase.

Detailed flows within the three M4 junctions are shown in Appendix C of the modelling (EV021). On the basis of these diagrams, as set out in the e-mail from 22nd May included as Appendix 5, National Highways do not have concerns with the impacts on Junctions 10 and 12, but have some concerns with the impact on Junction 11 towards the end of the plan period. These concerns relate specifically to both the westbound and eastbound off-slip.

The Council is seeking to address these concerns as part of a Statement of Common Ground.

IQ40. Is the Stantec Technical Note dated 29 April 2025 [EV022] the relevant final version of that note?

Yes. It is noted that there is a comment that has been accidentally left within the document, but there has been no revised version.

IQ41. Could the Council provide the most recent Local Transport Plan and Local Cycling and Walking Infrastructure Plan for my reference?

This has been added to the Examination library as EX004, with its various appendices listed as EX004a to EX004j.

Infrastructure and viability

IQ42. Could the Council explain how the Draft Infrastructure Delivery Plan (May 2025) [EV005] has influenced the LPPU's development and how it relates to Table 10.2 within the LPPU?

The Draft Infrastructure Delivery Plan (IDP, EV005) provides a narrative to explain the projects listed within Table 10.2 of the LPPU. The detail within the report summarises joint working between planning policy officers, internal RBC consultees (such as transport or adult social care) and external consultees (such as Thames Water and Thames Valley Police). The IDP was drafted iteratively, reflecting on-going discussions with infrastructure providers as the LPPU emerged beginning in April 2023. Officers explained the level of development expected within the Borough and providers made specific suggestions for infrastructure delivery based on both the cumulative effect of housing delivery anticipated within the plan period and consideration of specific sites. For example, following continued discussions with the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB ICB), the LPPU was amended to require consideration of ground-floor doctors surgeries within the town centre on specific allocated sites.

Table 10.2 reflects Section 6 of the IDP and simply illustrates the specific projects needed to support sustainable growth within the plan period.

IQ43. The Council should provide a Gantt chart showing the delivery of overall growth over the plan period (including commitments, windfall etc). It should also show each housing, employment, mixed-use and other allocations and the infrastructure necessary to bring forward each site with timescales and phasing, so I am able to see when key strategic items of infrastructure are required to unlock specific development.

A Gantt chart to accompany the Infrastructure Delivery Plan is included in Appendix 6. It is important to note that due to the nature of proposed development within the Borough, the very high level of infrastructure that Reading already provides and the fact that most sites already have an existing use it is very rarely the case that individual sites are directly dependent on the delivery of specific infrastructure projects. The projects listed aim to account for the cumulative effects of housing delivery across many sites, particularly within the town centre.

IQ44. What evidence is there to confirm that any likely infrastructure requirements have been taken into account in assessing the effect of LPPU policies on the viability and phasing of development?

Section 3.2 of the LPPU describes the spatial strategy for Reading and highlights that 59% of the development proposed within the plan period will occur within the central area. This will be achieved primarily by increasing densities on previously developed land. Because the vast majority of development will occur in highly accessible locations that are already located close to services and infrastructure, it is very unlikely that specific developments would be rendered unviable or see delayed phasing due to a lack of infrastructure. Virtually no developments proposed within the Borough are at such a scale that they would proceed or fail based on specific infrastructure schemes. Rather, the Plan aims to deliver on-going infrastructure improvements that will mitigate the cumulative effects of development across the Borough, particularly within the central area.

IQ45. The Council should provide full clarification of what policy costs have been considered in the Local Plan Viability Testing Report [EV004].

Appendix 5 of the Viability Testing Report (EV004) (page 72) identifies the building regulations and policy allowances which have been considered in the viability assessment.

In identifying construction costs used to inform the appraisals (Appendix 3, page 65) a range of individual allowances have been made to arrive at the overall construction cost total stated in £/psm. A generic allowance of 15% of base BCIS costs has been included under the heading of “sustainability” and refers to a range of construction and policy allowances.

Appendix 5 sets out the findings of the research regarding specific cost allowances which have been identified from a range of sources including other Local Plan viability assessments and industry studies. In most cases a range of figures or cost percentages has been identified. These are location and house type specific in some instances. Other allowances cover a wider range. The research therefore requires judgement as to the level of overall allowance which should be included and this is reflected in overall allowance of 15% applied to BCIS 15-year sample data rates.

The cost assessment took an overview on each of these inputs and proposed an aggregated total representing the cost allowance for a range of cost items including Part L (Zero Carbon), Part F (Ventilation), Part O (Overheating) and Part S (Infrastructure for Electric Vehicles). Costs considered also include provision of green infrastructure, biodiversity net gain, accessibility and adaptability requirements of the building regulations (M4(2), M4(3a) and M4(3b)) and delivery of electric vehicle charging points in line with LPPU Policy TR5.

Climate change

Questions IQ46 and IQ47 will be answered in a separate response to be submitted by 28th July.

IQ48. Could the Council clarify how Policies CC2 and H5 would be used together?

The general principles of Policy CC2 apply to all residential and non-residential development in the Borough, and as such form part of the cross-cutting policies section. Additional requirements for new-build residential development are stated in Policy H5, which includes

sustainability requirements that are specific to housing and a range of other housing standards such as accessibility and adaptability.

IQ49. As drafted, are Policies CC2 and H5 clearly written and unambiguous?

Yes. Policies CC2 and H5 have been carefully written to ensure that applicants can clearly ascertain requirements for specific types of development. The language in each policy reflects the adopted policies of other local authorities, including [Cornwall Council](#) and [Central Lincolnshire](#).

IQ50. Have the requirements of Policies CC2 and H5 been fully viability tested?

Yes. The Local Plan Viability Testing Report (EV004) considers the financial implications of the policies' requirements as detailed in Appendix 5. The testing applies a 15% additional cost allowance associated with the requirements of the Local Plan (including CC2 and H5). The proportion of the 15% that pertains to zero carbon requirements and is discussed in detail in paragraphs 1 – 6 of Appendix 5.

Urban greening factor

Questions IQ51 and IQ52 will be answered in a separate response to be submitted by 28th July.

IQ53. Have Urban Greening Factor requirements been fully viability tested?

Yes. The 15% additional cost allowance includes all the policies of the Local Plan as described in Appendix 5. Moreover, the requirements of the proposed Urban Greening Factor policy reflect the adopted approach of the London Plan, accompanied by a full [viability assessment](#) which discusses the specific implications of urban greening requirements in Annex 4. The requirements allow for a range of urban greening types to be applied in order to ensure flexibility.

General questions

IQ54. Is it necessary to have this cross-referencing of policies?

The general approach in policy drafting has been to avoid cross-referencing within policies themselves wherever possible, and that any cross-referencing necessary should be in the supporting text.

Most of the cross-references within both the policies and supporting text are carried over from the adopted Local Plan and are not new. However, there are two new cross-references within the policies themselves, as follows:

- H5 – cross-reference to CC2 – this is considered necessary to make clear how the two policies operate alongside one another, and not to include this cross-reference is likely to lead to confusion.
- H15 – cross-reference to H3 – this makes clear that purpose-built shared living (co-living) is a form of residential that is subject to affordable housing requirements, which is considered necessary to avoid misunderstanding.

In general, in both the existing plan and proposed updates, cross-references have only been included, usually in the supporting text, where they are considered necessary to make clear

how a policy interacts with other policies. There are exceptions, in particular policy H8 on house extensions which is likely to be read in particular by those who are less familiar with the planning system and in this instance it is intended to make clear that policies cannot be read in isolation.

IQ55. Does the Council envisage any potential issues with requiring development to be in accordance with all other policies?

The only locations where this wording is used is in the supporting text to the general site allocation policies (CR14 – 5.4.33, SR4 – 6.3.14, WR3 – 7.3.13, CA1 – 8.3.2 and ER1 – 9.3.2). This wording is unchanged from the adopted Local Plan, and no issues have arisen in applying the policies since it was adopted in 2019. The Council does not envisage any likelihood that this will cause particularly significant issues in the application of the policies as the intentions of the statement are generally understood.

It is considered particularly important to have some reference in the supporting text in these locations to the need for other policies to be applied to avoid any impression that allocation overrides policies that should be applied to all developments.

Nevertheless, the Council accepts that this may not be the clearest wording, and that case law has moved on, and considers that a modification to paragraphs 5.4.33, 6.3.14, 7.3.13, 8.3.2 and 9.3.2 as follows may be appropriate:

“need to ~~comply with all other~~have regard to relevant policies in the local plan”

Appendix 1: List of policies and parts of the plan that have been amended

Table A1.1 below lists all policies, allocations and sections of the LPPU that represent amendments to the adopted Local Plan, and whether the Council considers them to be within the scope of the examination in answer to IQ1.

Table A1.1: List of policies and parts of the plan that have been amended

Policy or part of the updated plan	Parts amended	In scope?	Reason not in scope	Other references ³
Section 1: Introduction	Text	Yes	N/A	None
Section 2: Vision and objectives	Text	Yes	N/A	None
Section 3: Spatial strategy	Text and diagrams	Yes	N/A	None
CC1: Presumption in favour of sustainable development	Supporting text	No	Minor factual update	None
CC2: Sustainable design and construction	Policy and supporting text	Yes	N/A	None
CC3: Adaptation to climate change	Policy and supporting text	Yes	N/A	None
CC4: Decentralised energy	Policy and supporting text	Yes	N/A	None
CC5: Waste minimisation and storage	Supporting text	No	Minor factual updates	None
CC6: Accessibility and the intensity of development	Supporting text	No	Minor factual update	None
CC7: Design and the public realm	Policy and supporting text	Yes	N/A	None
CC8: Safeguarding amenity	Supporting text	No	Minor factual updates	None
CC9: Securing infrastructure	Policy and supporting text	Yes	N/A	None
CC10: Health impact assessment	New policy and supporting text	Yes	N/A	None
Section 4.2 introductory text (4.2.1-4.2.11)	Text	No	Minor factual updates	None
EN1: Protection and enhancement of the historic environment	Supporting text	No	Minor factual updates	None

³ **HELAA** – Housing and Economic Land Availability Assessment (EV015 and EV016); **Reg18** – LPPU Consultation on Scope and Content (LP008)

Policy or part of the updated plan	Parts amended	In scope?	Reason not in scope	Other references ³
EN3: Enhancement of conservation areas	Supporting text	No	Minor factual updates	None
EN4: Locally important heritage assets	Policy and supporting text	Yes	N/A	None
EN5: Protection of significant views with heritage interest	Policy and supporting text	No	Minor factual updates	None
EN7: Local green space and public open space	Policy and supporting text	Yes	N/A	None
EN9: Provision of open space	Supporting text	No	Minor factual update	None
EN12: Biodiversity	Policy and supporting text	Yes	N/A	EN12: Biodiversity and the green network (<i>adopted plan</i>)
EN13: Major landscape features and national landscapes	Policy and supporting text	Yes	N/A	EN13: Major landscape features and areas of outstanding natural beauty (<i>adopted plan</i>)
EN14: Trees, hedges and woodlands	Policy and supporting text	Yes	N/A	None
EN15: Air quality	Supporting text	No	Minor factual updates	None
EN18: Flooding and sustainable drainage systems	Policy and supporting text	Yes	N/A	None
EN19: Urban greening factor	New policy and supporting text	Yes	N/A	None
Paragraph 4.3.3	Introductory text	No	Minor update	None
EM1: Provision of employment development	Policy and supporting text	Yes	N/A	None
EM2: Location of new employment development	Supporting text ⁴	Yes	N/A	None
H1: Provision of housing	Policy and supporting text	Yes	N/A	None
H2: Density and mix	Policy and supporting text	Yes	N/A	None
H3: Affordable housing	Policy and supporting text	Yes	N/A	None

⁴ The actual updates are very minor, but this policy is fundamentally linked to the level of employment need in EM1 so needs to remain in scope.

Policy or part of the updated plan	Parts amended	In scope?	Reason not in scope	Other references ³
H4: Build to rent schemes	Policy and supporting text	Yes	N/A	None
H5: Standards for new housing	Policy and supporting text	Yes	N/A	None
H6: Accommodation for vulnerable people	Policy and supporting text	Yes	N/A	None
H7: Protecting the existing housing stock	Policy and supporting text	Yes	N/A	None
H8: Residential conversions	Policy and supporting text	Yes	N/A	None
H9: House extensions and ancillary accommodation	Supporting text	No	Minor factual update	None
H12: Student accommodation	Supporting text	No	Factual update that does not affect the need or strategy, Deletion of 4.4.102 is consequential from other changes that are within scope.	None
H14: Renewal and regeneration of residential areas	Policy and supporting text	Yes	N/A	H14: Suburban renewal and regeneration (<i>adopted plan</i>)
H15: Purpose-built shared living accommodation	New policy and supporting text	Yes	N/A	None
TR1: Achieving the transport strategy	Policy and supporting text	Yes	N/A	None
TR2: Major transport projects	Policy and supporting text	Yes	N/A	None
TR4: Cycle routes and facilities	Policy and supporting text	Yes	N/A	None
TR5: Car and cycle parking and electric vehicle charging	Policy and supporting text	Yes	N/A	None
RL2: Scale and location of retail, leisure and culture development	Policy and supporting text	Yes	N/A	None
RL3: Vitality and viability of smaller centres	Policy and supporting text	Yes	N/A	None
RL4: Betting shops and payday loan companies	Policy and supporting text	Yes	N/A	None

Policy or part of the updated plan	Parts amended	In scope?	Reason not in scope	Other references ³
OU1: New and existing community facilities	Supporting text	No	Minor factual update	None
OU2: Hazardous installations	Policy and supporting text	Yes	N/A	None
OU3: Telecommunications development	Policy and supporting text	Yes	N/A	None
OU5: Shopfronts and cash machines	Supporting text	No	Minor factual update	None
Section 5.1: Area context	Text	No	Minor factual update	None
Section 5.2: Strategy for Central Reading	Text and diagrams	Yes	N/A	None
CR1: Definition of Central Reading	Supporting text	No	Minor factual update	None
CR2: Design in Central Reading	Policy and supporting text	Yes	N/A	None
CR6: Living in Central Reading	Policy and supporting text	Yes	N/A	None
CR7: Primary frontages in Central Reading	Policy and supporting text	Yes	N/A	None
CR10: Tall buildings	Policy and supporting text	Yes	N/A	None
CR11: Station/River Major Opportunity Area	Policy. supporting text and diagrams	Yes	N/A	None
CR11a: Friar Street and Station Road	Policy	Yes	N/A	AB001-AB011 (<i>HELAA</i>)
CR11b: Greyfriars Road Corner	Policy	Yes	N/A	AB012, AB013 (<i>HELAA</i>)
CR11c: Station Hill and Friars Walk	Policy	Yes	N/A	AB015-AB017 (<i>HELAA</i>)
CR11d: Brunel Arcade and Apex Plaza	Policy	Yes	N/A	AB057, AB058 (<i>HELAA</i>)
CR11e: North of Station	Policy	Yes	N/A	TH001-TH003 (<i>HELAA</i>)
CR11f: West of Caversham Road	Policy	Yes	N/A	TH004, TH005 (<i>HELAA</i>)
CR11g: Riverside	Policy	Yes	N/A	TH006, TH007 (<i>HELAA</i>)
CR11i: Napier Court	Policy	Yes	N/A	TH008, TH009 (<i>HELAA</i>)

Policy or part of the updated plan	Parts amended	In scope?	Reason not in scope	Other references ³
CR12: West Side Major Opportunity Area	Policy. supporting text and diagrams	Yes	N/A	None
CR12a: Cattle Market	Policy	Yes	N/A	AB018 (<i>HELAA</i>)
CR12b: Great Knollys Street and Weldale Street	Policy	Yes	N/A	AB019-AB031 (<i>HELAA</i>)
CR12c: Chatham Street, Eaton Place and Oxford Road	Policy	Yes	N/A	AB044-AB049 (<i>HELAA</i>)
CR12d: Broad Street Mall	Policy	Yes	N/A	AB033-AB038 (<i>HELAA</i>)
CR12e: Hosier Street	Policy	Yes	N/A	AB039-AB042 (<i>HELAA</i>)
CR13: East Side Major Opportunity Area	Policy. supporting text and diagrams	Yes	N/A	None
CR13a: Reading Prison	Policy	Yes	N/A	AB043 (<i>HELAA</i>)
CR13b: Forbury Retail Park	Policy	Yes	N/A	TH011-TH013 (<i>HELAA</i>)
CR13c: Forbury Business Park and Kenavon Drive	Policy	Yes	N/A	TH014-TH018 (<i>HELAA</i>)
CR13d: Gas Holder	Policy	Yes	N/A	TH019 (<i>HELAA</i>)
CR14: Other sites for development in Central Reading	Supporting text	Yes	N/A	None
CR14a: Central Swimming Pool, Battle Street	Policy	Yes	N/A	AB050 (<i>HELAA</i>) Land at Battle Street (<i>Trajectory</i>)
CR14b: Former Reading Family Centre, North Street	Policy (deleted site)	Yes	N/A	None
CR14c: 17-23 Queen Victoria Street	Policy (deleted site)	Yes	N/A	None
CR14d: 173-175 Friar Street and 27-32 Market Place	Policy	Yes	N/A	AB052, AB053 (<i>HELAA</i>)

Policy or part of the updated plan	Parts amended	In scope?	Reason not in scope	Other references ³
CR14e: 3-10 Market Place, Abbey Hall and Abbey Square	Policy (deleted site)	Yes	N/A	AB054 (<i>HELAA</i>) 173-175 Friar Street (part of site) (<i>Trajectory</i>)
CR14f: 1-5 King Street	Policy (deleted site)	Yes	N/A	None
CR14g: The Oracle Riverside East	Policy	Yes	N/A	Part of CR14g: The Oracle Extension, Bridge Street and Letcombe Street (adopted plan) AB055, AB097 (<i>HELAA</i>)
CR14h: Central Club, London Street	Policy	Yes	N/A	KA002 (<i>HELAA</i>)
CR14i: Enterprise House, 89-97 London Street	Policy	Yes	N/A	KA003 (<i>HELAA</i>)
CR14j: Corner of Crown Street and Southampton Street	Policy	Yes	N/A	KA004 (<i>HELAA</i>)
CR14k: Corner of Crown Street and Silver Street	Policy (deleted site)	Yes	N/A	None
CR14l: 187-189 Kings Road	Policy	Yes	N/A	TH020 (<i>HELAA</i>)
CR14n: Reading Central Library, Abbey Square	Policy (new site)	Yes	N/A	AB061 (<i>HELAA</i>) Cen2 (<i>Reg18</i>)
CR14o: 100 Kings Road	Policy (new site)	Yes	N/A	AB095 (<i>HELAA</i>)
CR14p: Queens Wharf, Queens Road	Policy (new site)	Yes	N/A	AB103 (<i>HELAA</i>)
CR14q: Havell House, 62-66 Queens Road	Policy (new site)	Yes	N/A	RE016 (<i>HELAA</i>)
CR14r: John Lewis Depot, Mill Lane	Policy (new site)	Yes	N/A	Part of CR14g: The Oracle Extension, Bridge Street and Letcombe Street (adopted plan) KA001 (<i>HELAA</i>) Cen3 (<i>Reg18</i>)

Policy or part of the updated plan	Parts amended	In scope?	Reason not in scope	Other references ³
CR14s: 20-22 Duke Street	Policy (new site)	Yes	N/A	AB099 (HELAA)
CR14t: Aquis House, 41-59 Forbury Road	Policy (new site)	Yes	N/A	AB082 (HELAA) Cen1 (part) (Reg18)
CR14u: 33 Blagrove Street	Policy (new site)	Yes	N/A	AB083 (HELAA) Cen1 (part) (Reg18)
CR14v: 2 Norman Place	Policy (new site)	Yes	N/A	TH054 (HELAA) Cen5 (Reg18)
CR14w: Reading Bridge House, George Street	Policy (new site)	Yes	N/A	TH055 (HELAA) Cen6 (Reg18)
CR14x: Part of Tesco Car Park, Portman Road	Policy (new site)	Yes	N/A	TH022 (HELAA) Cen7 (Reg18)
CR14y: Kennet Place, Kings Road	Policy (new site)	Yes	N/A	TH056 (HELAA) Cen8 (Reg18)
CR14z: Sapphire Plaza, Watlington Street	Policy (new site)	Yes	N/A	AB084 (HELAA) Cen9 (part) (Reg18)
CR14aa: Part of Reading College, Kings Road	Policy (new site)	Yes	N/A	TH057 (HELAA) Cen10 (Reg18)
CR14ab: 160-163 Friar Street	Policy (new site)	Yes	N/A	AB076 (HELAA)
CR15: The Reading Abbey Quarter	Policy and supporting text	Yes	N/A	None
Section 6.1: Area context	Text	Yes	N/A	None
Section 6.2: Strategy for South Reading	Text and diagrams	Yes	N/A	None
SR1: Island Road Major Opportunity Area	Policy, supporting text and diagram	Yes	N/A	None
SR1a: Former Landfill, Island Road	Policy	Yes	N/A	WH001 (HELAA)
SR1b: North of Island Road	Policy (deleted site)	Yes	N/A	None

Policy or part of the updated plan	Parts amended	In scope?	Reason not in scope	Other references ³
SR1c: Island Road A33 Frontage	Policy	Yes	N/A	WH002 (<i>HELAA</i>)
SR2: Land North of Manor Farm Road	Policy. supporting text and diagram	Yes	N/A	WH003-WH005, WH009, WH010 (<i>HELAA</i>)
SR3: South of Elgar Road	Policy. supporting text and diagram	Yes	N/A	KA005-KA008 (<i>HELAA</i>)
SR4: Other sites for development in South Reading	Supporting text	Yes	N/A	None
SR4a: Pulleyn Park, Rose Kiln Lane	Policy	Yes	N/A	KA009, KA010 (<i>HELAA</i>)
SR4b: Rear of 3-29 Newcastle Road	Policy	Yes	N/A	RE001 (<i>HELAA</i>)
SR4c: 169-173 Basingstoke Road	Policy	Yes	N/A	KA011 (<i>HELAA</i>)
SR4d: 16-18 Bennet Road	Policy	Yes	N/A	WH011 (<i>HELAA</i>)
SR4e: Part of former Berkshire Brewery site	Policy	Yes	N/A	WH012 (<i>HELAA</i>)
SR4f: Land south west of Junction 11 of the M4	Policy (deleted site)	Yes	N/A	WH013 (<i>HELAA</i>)
SR4g: Reading Link Retail Park, Rose Kiln Lane	Policy (new site)	Yes	N/A	CO005 (<i>HELAA</i>) Sou1 (<i>Reg18</i>)
SR4h: 11 Basingstoke Road	Policy (new site)	Yes	N/A	KA046 (<i>HELAA</i>)
SR4i: 85-87 Basingstoke Road	Policy (new site)	Yes	N/A	KA045 (<i>HELAA</i>)
SR4j: Land at Warwick House, Warwick Road	Policy (new site)	Yes	N/A	RE010 (<i>HELAA</i>)
SR4k: Former Sales and Marketing Suite, Drake Way	Policy (new site)	Yes	N/A	WH048 (<i>HELAA</i>) Sou3 (<i>Reg18</i>)
SR4l: Land at Drake Way	Policy (new site)	Yes	N/A	WH018 (<i>HELAA</i>)
SR5: Kennet Meadows	Policy and supporting text	Yes	N/A	SR5: Leisure and recreation use of the Kennetside Areas (<i>adopted plan</i>)
Section 7.1: Area context	Text	No	Minor factual update	None

Policy or part of the updated plan	Parts amended	In scope?	Reason not in scope	Other references ³
Section 7.2: Strategy for West Reading and Tilehurst	Text and diagram	Yes	N/A	None
WR2: Park Lane Primary School, The Laurels and Downing Road	Supporting text	No	Minor factual update	TI001-TI004 (<i>HELAA</i>)
WR3: Other sites for development in West Reading and Tilehurst	Supporting text	Yes	N/A	None
WR3a: Former Cox & Wyman Site, Cardiff Road	Policy (deleted site)	Yes	N/A	None
WR3b: 2 Ross Road and Part of Meadow Road	Policy	Yes	N/A	TH022, TH023 (<i>HELAA</i>)
WR3c: 28-30 Richfield Avenue	Policy (deleted site)	Yes	N/A	TH024 (<i>HELAA</i>)
WR3d: Rivermead Leisure Centre, Richfield Avenue	Policy (deleted site)	Yes	N/A	None
WR3e: Yeomanry House, Castle Hill	Policy (deleted site)	Yes	N/A	CO001 (<i>HELAA</i>)
WR3f: 4 Berkeley Avenue	Policy	Yes	N/A	CO002 (<i>HELAA</i>)
WR3g: 211-221 Oxford Road	Policy	Yes	N/A	CO003 (<i>HELAA</i>)
WR3h: Rear of 303-315 Oxford Road	Policy	Yes	N/A	BA001 (<i>HELAA</i>)
WR3i: Land at Portman Way	Policy	Yes	N/A	BA002 (<i>HELAA</i>)
WR3j: Land at Moultsford Mews	Policy	Yes	N/A	BA003 (<i>HELAA</i>) Land at 362 Oxford Road (<i>Trajectory</i>)
WR3k: 784-794 Oxford Road	Policy	Yes	N/A	BA004 (<i>HELAA</i>)
WR3l: 816 Oxford Road	Policy	Yes	N/A	BA005 (<i>HELAA</i>)
WR3m: 103 Dee Road	Policy (deleted site)	Yes	N/A	NO002 (<i>HELAA</i>)
WR3n: Amethyst Lane	Policy	Yes	N/A	SO001 (<i>HELAA</i>)
WR3o: The Meadway Centre, Honey End Lane	Policy	Yes	N/A	NO003 (<i>HELAA</i>)
WR3p: Former Alice Burrows Home, Dwyer Road	Policy	Yes	N/A	SO002 (<i>HELAA</i>)

Policy or part of the updated plan	Parts amended	In scope?	Reason not in scope	Other references ³
WR3q: Norcot Community Centre, Lyndhurst Road	Policy (deleted site)	Yes	N/A	None
WR3r: Former Charters Car Sales, Oxford Road	Policy	Yes	N/A	KE001 (<i>HELAA</i>)
WR3s: Land at Kentwood Hill	Policy	Yes	N/A	KE002 (<i>HELAA</i>)
WR3t: Land at Armour Hill	Policy	Yes	N/A	KE003 (<i>HELAA</i>)
WR3u: 132-134 Bath Road	Policy (new site)	Yes	N/A	SO009 (<i>HELAA</i>) Wes3 (<i>Reg18</i>)
WR3v: Former Southcote Library, Coronation Square	Policy (new site)	Yes	N/A	SO012 (<i>HELAA</i>) Wes4 (<i>Reg18</i>)
WR3w: Part of Tesco Car Park, Portman Road	Policy (new site)	Yes	N/A	BA025 (<i>HELAA</i>)
WR3x: 1-15 St George's Road	Policy (new site)	Yes	N/A	NO006 (<i>HELAA</i>)
SR3y: 72 Berkeley Avenue	Policy (new site)	Yes	N/A	CO013 (<i>HELAA</i>) Wes2 (<i>Reg18</i>)
Section 8.1: Area context	Text	No	Minor factual updates	None
Section 8.2: Strategy for Caversham and Emmer Green	Text and diagram	Yes	N/A	None
CA1: Sites for development in Caversham and Emmer Green	Policy and supporting text	Yes	N/A	CA1: Sites for development and change of use in Caversham and Emmer Green (<i>adopted plan</i>)
CA1a: Reading University Boat Club, Thames Promenade	Policy	Yes	N/A	TH026 (<i>HELAA</i>)
CAR1b: Part of Reading Golf Course, Kidmore End Road	Policy (deleted site)	Yes	N/A	None
CA1c: Land at Lowfield Road	Policy	Yes	N/A	EG002 (<i>HELAA</i>)

Policy or part of the updated plan	Parts amended	In scope?	Reason not in scope	Other references ³
CA1d: Rear of 200-214 Henley Road, 12-24 All Hallows Road & 7 & 8 Copse Avenue	Policy	Yes	N/A	CA1d: Rear of 200-214 Henley Road, 12-24 All Hallows Road & 4, 7 & 8 Copse Avenue (<i>adopted plan</i>) EG003 (<i>HELAA</i>)
CA1e: Rear of 13-14a Hawthorne Road & 284-292 Henley Road	Policy	Yes	N/A	EG004 (<i>HELAA</i>)
CA1f: Rear of 1 & 3 Woodcote Road and 21 St Peters Hill	Policy	Yes	N/A	CH001 (<i>HELAA</i>)
CA1g: Land west of Henley Road Cemetery	Policy (deleted site)	Yes	N/A	None
CA1h: Hemdean House School, Hendean Road	Policy	Yes	N/A	CA007 (<i>HELAA</i>)
CA2: Caversham Park	Policy	No	Minor factual update	EG005 (<i>HELAA</i>)
Section 91: Area context	Text	No	Minor factual updates	None
Section 9.2: Strategy for East Reading	Text and diagram	Yes	N/A	None
ER1: Sites for development in East Reading	Supporting text	Yes	N/A	None
ER1a: The Woodley Arms, Waldeck Street	Policy (deleted site)	Yes	N/A	KA012 (<i>HELAA</i>)
ER1b: Dingley House, 3-5 Craven Road	Policy	Yes	N/A	RE002 (<i>HELAA</i>)
ER1c: Land rear of 8-26 Redlands Road	Policy	Yes	N/A	RE003 (<i>HELAA</i>)
ER1d: Land adjacent to 40 Redlands Road	Policy	Yes	N/A	RE004 (<i>HELAA</i>)
ER1e: St Patrick's Hall, Northcourt Avenue	Policy	Yes	N/A	RE005 (<i>HELAA</i>)
ER1f: Hamilton Centre, Bulmershe Road	Policy (deleted site)	Yes	N/A	None
ER1g: Alexander House, Kings Road	Policy (deleted site)	Yes	N/A	PA001 (<i>HELAA</i>)
ER1h: Arthur Hill Swimming Pool, 221-225 Kings Road	Policy (deleted site)	Yes	N/A	None

Policy or part of the updated plan	Parts amended	In scope?	Reason not in scope	Other references ³
ER1i: 265-271 London Road	Policy	Yes	N/A	PA003 (<i>HELAA</i>)
ER1j: Palmer Park Stadium Area	Policy (deleted site)	Yes	N/A	None
ER1k: 131 Wokingham Road	Policy	Yes	N/A	PA004 (<i>HELAA</i>)
ER1l: Princes House, 53a London Road	Policy (new site)	Yes	N/A	RE017 (<i>HELAA</i>)
ER1m: Land adjacent to 17 Craven Road	Policy (new site)	Yes	N/A	RE007 (<i>HELAA</i>)
ER1n: 51 Church Road, Earley	Policy (new site)	Yes	N/A	PA008 (<i>HELAA</i>)
ER2: Whiteknights Campus, University of Reading	Policy and supporting text	Yes	N/A	None
ER3: Royal Berkshire Hospital	Policy and supporting text	Yes	N/A	RE006 (<i>HELAA</i>)
Section 10: Implementation	Text	Yes	N/A	None
Section 11: Monitoring	Text	Yes	N/A	None
Section 12: Glossary	Text	Yes	N/A	None
Appendix 1: Housing trajectory	Text and diagrams	Yes	N/A	None

Appendix 2: Reason for changes in dwelling range in allocations

The table below summarises the change in dwelling range of allocations between the adopted Local Plan and the LPPU and the reason for that change, to assist with the answer to IQ25. Please be aware that these are summaries of the main reasons only, as on some sites the HELAA process is complex and there may be a considerable number of reasons why a final calculation differs from the 2017 assessment.

Table A2.1: Reason for changes in dwelling range on existing allocations

Allocation	HELAA ref	Local Plan 2019	LPPU 2024	Change	Summary of main reason(s) for change
CR11a: Friar Street and Station Road	AB001-AB011	150-270	120-190	-30/-80	Splitting of site into constituent elements allows a more fine-grained analysis, and this includes assuming part of site for a hotel as per now-lapsed planning permission.
CR11b: Greyfriars Road Corner	AB012, AB013	90-140	160-230	+70/+90	Granting of a planning permission for 135 dwellings on part of site (now lapsed).
CR11c: Station Hill and Friars Walk	AB015-AB017	380-570	490-934	+110/+664	Based on Station Hill planning permissions, bearing in mind the wide dwelling range in the outline permission for Phase 3.
CR11d: Brunel Arcade and Apex Plaza	AB057, AB058	250-380	280-420	+30/+40	Site-by-site calculation is based on an increased height of the non-tall building element from six to eight storeys.
CR11e: North of Station	TH001-TH003	640-960	1,190-1,790	+550/+830	New outline planning permissions granted on most of the site for 620 dwellings (80 Caversham Road) and 1,000 dwellings (Vastern Court, but illustrative scheme used to calculate range).

Allocation	HELAA ref	Local Plan 2019	LPPU 2024	Change	Summary of main reason(s) for change
CR11f: West of Caversham Road	TH004, TH005	75-115	94-140	+19/+25	Granting of planning permission for 60 dwellings on part of site, and increase in urban pattern book density on remainder.
CR11g: Riverside	TH006, TH007	250-370	250-380	0/+10	Granting of planning permission for 209 dwellings on part of site, use of town centre rather than town centre fringe density on remainder, but removal of part of site for treed corridor on Vastern Road.
CR11i: Napier Court	TH008, TH009	210-310	250-370	+40/+60	Use of town centre rather than town centre fringe density on most of site.
CR12a: Cattle Market	AB018	330-490	560-840	+230/+350	Removal of retail part of allocation, allowing a town centre pattern book density to be applied rather than a site-by-site calculation.
CR12b: Great Knollys Street and Weldale Street	AB019-AB031	280-510	260-380	-20/-130	Granting of planning permissions on three parts of site and removal of some completed dwellings under one of those permissions, and use of town centre rather than town centre fringe density on remainder.
CR12c: Chatham Street, Eaton Place and Oxford Road	AB044-AB049	180-260	190-280	+10/+20	Use of town centre rather than town centre fringe density, granting of permission on part of site for 54 dwellings, removal of completed dwellings.
CR12d: Broad Street Mall	AB033-AB038	280-420	420-600	+140/+180	Granting of planning permissions on parts of site for 422 and 48 dwellings.
CR12e: Hosier Street	AB039-AB042	500-750	650-970	+150/+220	Assumed slightly greater height in site-by-site calculation (8 vs 7 storeys) to reflect surrounding increase in height in particular Broad Street Mall permission.

Allocation	HELAA ref	Local Plan 2019	LPPU 2024	Change	Summary of main reason(s) for change
CR13b: Forbury Retail Park	TH011-TH013	1,230-1,840	870-1,300	-360/-540	Removal of dwellings that are already completed
CR13c: Forbury Business Park and Kenavon Drive	TH014-TH018	190-285	320-490	+130/+205	Previously based on urban density, now based on mixed urban and town centre density to reflect changed character of surroundings
CR13d: Gas Holder	TH019	46-70	46-130	0/+60	Granting of planning permission for 130 dwellings.
CR14a: Central Swimming Pool, Battle Street	AB050	80-120	56-120	-24/0	Granting of planning permission for 56 dwellings.
CR14d: 173-175 Friar Street and 27-32 Market Place	AB052, AB053	36-54	34-54	-2/0	Granting of planning permissions that would total 34 dwellings.
CR14h: Central Club, London Street	KA002	8-12	14-20	+6/+8	Resolution to grant planning permission for 17 dwellings
CR14i: Enterprise House, 89-97 London Street	KA003	8-12	9-13	+1/+1	Based on pattern book for conversion rather than old lapsed permission
CR14l: 187-189 Kings Road	TH020	22-33	11-17	-11/-16	Previous allocation was based on old pre-app advice for student studios, proposed amendment based on general housing
SR2: Land North of Manor Farm Road	WH003-WH005, WH009, WH010	680-1,020	1,000-1,490	+320/+470	Increase in urban pattern book density and removal of an allowance for a school, but removal of part of site recently developed for district centre uses
SR3: South of Elgar Road	KA005-KA008	330-500	360-540	+30/+40	Increase in urban pattern book density but assumption of development of part of site at suburban density due to major landscape feature

Allocation	HELAA ref	Local Plan 2019	LPPU 2024	Change	Summary of main reason(s) for change
SR4a: Pulleyn Park, Rose Kiln Lane	KA009, KA010	70-100	80-120	+10/+20	Increase in urban pattern book density but inclusion of a set 20m buffer to commercial
SR4b: Rear of 3-29 Newcastle Road	RE001	18-27	14-22	-4/-5	Existing allocation did not account for demolition of homes to provide access.
SR4c: 169-173 Basingstoke Road	KA011	50-80	72-110	+22/+30	Increase in urban pattern book density
WR3b: 2 Ross Road and Part of Meadow Road	TH022, TH023	39-60	41-61	+2/+1	Increase in urban pattern book density but inclusion of a set 20m buffer to industrial
WR3f: 4 Berkeley Avenue	CO002	10-14	11-17	+1/+3	Figure from lapsed permission is now mid-point of range rather than maximum
WR3g: 211-221 Oxford Road	CO003	6-10	9-13	+3/+3	Reduction in site boundary to remove completed development, and inclusion of dwelling potential on Tesco site
WR3h: Rear of 303-315 Oxford Road	BA001	14-20	10-16	-4/-4	Resolution to grant planning permission for 13 dwellings
WR3i: Land at Portman Way	BA002	160-240	18-26	-142/-214	The vast majority of the site has been built out and the allocation boundary amended to a small remaining part of the site.
WR3j: Land at Moultsford Mews	BA003	10-16	21-31	+11/+15	Granting of planning permission for 26 dwellings
WR3k: 784-794 Oxford Road	BA004	14-22	18-26	+4/+4	Increase in urban pattern book density but reduction in site for treed corridor on Oxford Road
WR3l: 816 Oxford Road	BA005	13-20	20-30	+7/+10	Increase in urban pattern book density
WR3n: Amethyst Lane	SO001	32-48	16-24	-16/-24	Granting of planning permission for 20 dwellings and inclusion of respite care as in permission.

Allocation	HELAA ref	Local Plan 2019	LPPU 2024	Change	Summary of main reason(s) for change
WR3o: The Meadway Centre, Honey End Lane	NO003	0	Up to 231	+231	To reflect application that had resolution to grant subject to S106 (now disposed)
WR3p: Former Alice Burrows Home, Dwyer Road	SO002	18-26	24-36	+6/+10	Granting of planning permission for 30 dwellings
WR3r: Former Charters Car Sales, Oxford Road	KE001	12-18	8-12	-4/-6	Reflect treed corridor on Oxford Road
WR3s: Land at Kentwood Hill	KE002	41-62	32-48	-9/-14	Reduction in site area to remove area of greatest biodiversity significance.
WR3t: Land at Armour Hill	KE003	12-18	10-14	-2/-4	Reduction in site area to remove area of greatest biodiversity significance.
CA1a: Reading University Boat Club, Thames Promenade	TH026	16-25	18-28	+2/+3	Increased urban pattern book density, but applied to smaller area of site outside Flood Zone 3
CA1c: Land at Lowfield Road	EG002	24-36	21-31	-3/-5	Inclusion of buffer to Local Wildlife Site
CA1e: Rear of 13-14a Hawthorne Road & 284-292 Henley Road	EG004	9-13	8-12	-1/-1	Reduction in site boundary to remove completed development
CA1f: Rear of 1 & 3 Woodcote Road and 21 St Peters Hill	CH001	8-12	11-17	+3/+5	Use of pattern book density rather than using existing Symeon Place density
ER1b: Dingley House, 3-5 Craven Road	RE002	15-22	30-46	+15/+24	Assumed development of non-locally listed land at urban density rather than a two-storey development
ER1c: Land rear of 8-26 Redlands Road	RE003	12-20	14-20	+2/0	Use of suburban density rather than 33 dph
ER1d: Land adjacent to 40 Redlands Road	RE004	23-35	25-37	+2/+2	Increase in urban density, but assumed western part of site at suburban density
ER1i: 265-271 London Road	PA003	10-16	10-14	0/-2	Reflect treed corridor on London Road

Allocation	HELAA ref	Local Plan 2019	LPPU 2024	Change	Summary of main reason(s) for change
ER1k: 131 Wokingham Road	PA004	8-12	10-14	+2/+2	Assumed increased plot ratio in line with town centre sites

Appendix 3: Full basis for calculation of proportion of housing requirement that is on sites of less than 1 hectare

Table A3.1 lists the sites of more than 1 hectare (including both allocations and permissions) and the contribution that they make to the housing requirement according to the HELAA.

Table A3.1: Sites of more than 1 hectare

Site	LPPU Ref	HELAA Ref	Area (ha)	Dwellings
Friar Street and Station Road	CR11a	AB001-AB011	1.36	129
Station Hill and Friars Walk	CR11c	AB015-AB017	2.17	585
Brunel Arcade and Apex Plaza	CR11d	AB057, AB058	1.51	202
North of the Station	CR11e	TH001-TH003	6.71	1,169
Riverside	CR11g	TH006, TH007	1.24	194
Napier Court	CR11i	TH008, TH009	1.84	215
Cattle Market	CR12a	AB018	2.46	593
Great Knollys Street and Weldale Street	CR12b	AB019-AB031	3.02	275
Chatham Street, Eaton Place and Oxford Road	CR12c	AB044-AB049	1.01	193
Broad Street Mall	CR12d	AB033-AB038	2.75	437
Hosier Street	CR12e	AB039-AB042	3.41	595
Forbury Retail Park	CR13b	TH011-TH013	3.98	813
Forbury Business Park and Kenavon Drive	CR13c	TH014-TH018	2.07	347
The Oracle Riverside East	CR14g	AB055, AB097	1.26	264
Land North of Manor Farm Road	SR2	WH003-WH010	12.06	797
Land South of Elgar Road	SR3	KA005-KA008	5.38	239
Pulleyn Park, Rose Kiln Lane	SR4a	KA009, KA010	1.29	64
Reading Link Retail Park, Rose Kiln Lane	SR4g	CO005	2.12	158
11 Basingstoke Road	SR4h	KA046	1.91	143
Dee Park	WR1	NO001	16.4	91
The Meadway Centre, Honey End Lane	WR3o	NO003	2.99	215
Caversham Park	CA2	EG005	38.28	147
St Patrick's Hall, Northcourt Avenue	ER1e	RE005	3.39	101
St Martins Precinct, Church Street, Caversham	N/A	CA001	1.71	37
Chazey Farm, The Warren	N/A	CH007	1.69	29
Wensley Road	N/A	CO014	2.36	46
Part of Reading Golf Course, Kidmore End Lane	N/A	EG001	12.13	223
Great Brighams Mead	N/A	TH031	1.04	110

Site	LPPU Ref	HELAA Ref	Area (ha)	Dwellings
Green Park Village, Longwater Avenue	N/A	WH015	24.41	302
Land at the Madejski Stadium, Shooters Way	N/A	WH022	16.38	575
TOTAL	-	-	-	9,288

As a percentage of site-specific supply

Total dwellings on HELAA sites 2023-2041 after variance rates – 11,887⁵

Dwellings on specific sites of more than 1 ha – 9,288

Percentage on sites of more than 1 ha – 78.1%

Percentage on sites of less than 1 ha – 21.9%

As a percentage of total housing supply

Total housing supply from HELAA – 14,849⁶

Dwellings on specific sites of more than 1 ha – 9,288

Plus “Other Allowances” – 400

Total dwellings on sites of more than 1 ha – 9,688

Percentage on sites of more than 1 ha – 65.2%

Percentage on sites of less than 1 ha – 34.8%

⁵ From table 4.4 of the HELAA (EV015)

⁶ From table 4.4 of the HELAA (EV015)

Appendix 4: Plans of omission sites

Figure A4.1: Crowne Plaza Reading, Richfield Avenue

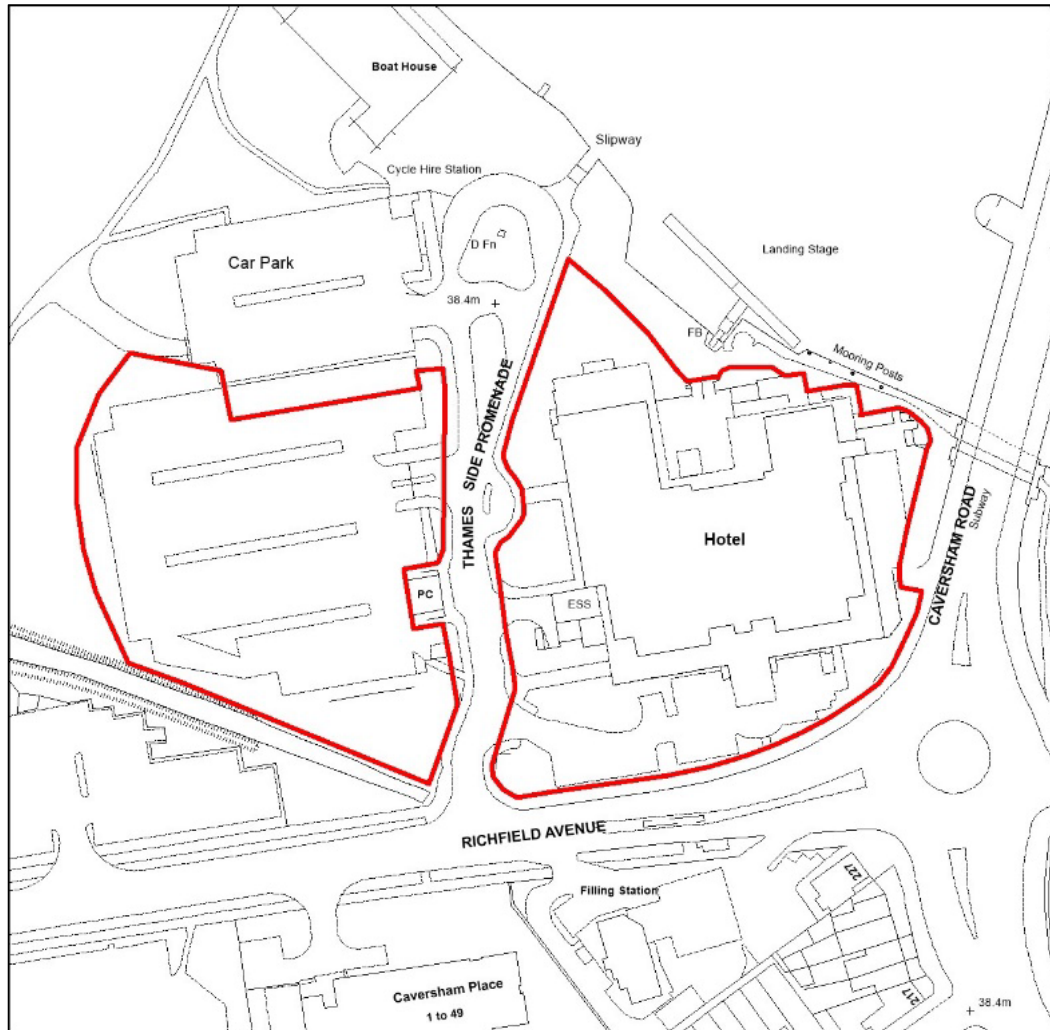
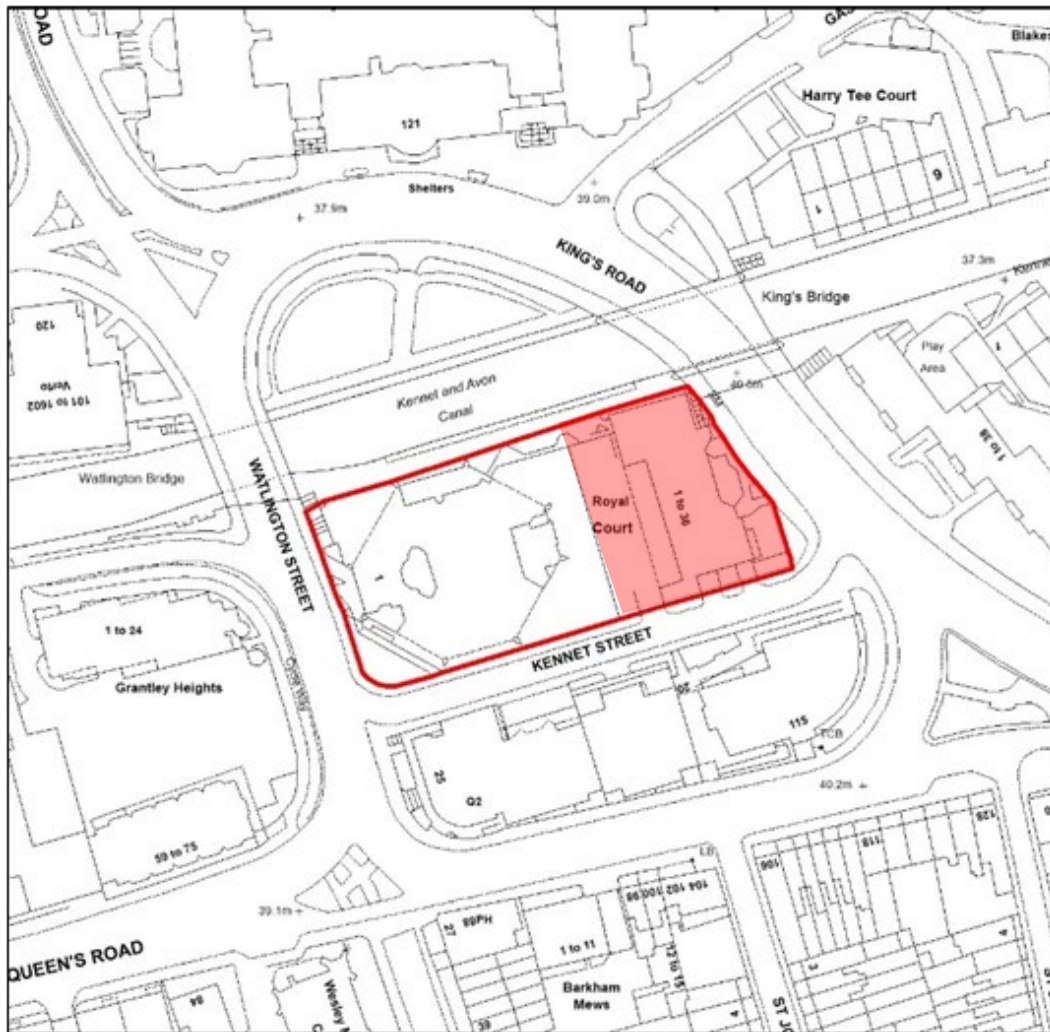


Figure A4.2: Royal Court, Kings Road



NB. The whole nominated site is shown with the red boundary. Royal Court, the area excluded from the draft allocation, is shaded in pink

Figure A4.3: Tunbridge Jones, Cradock Road

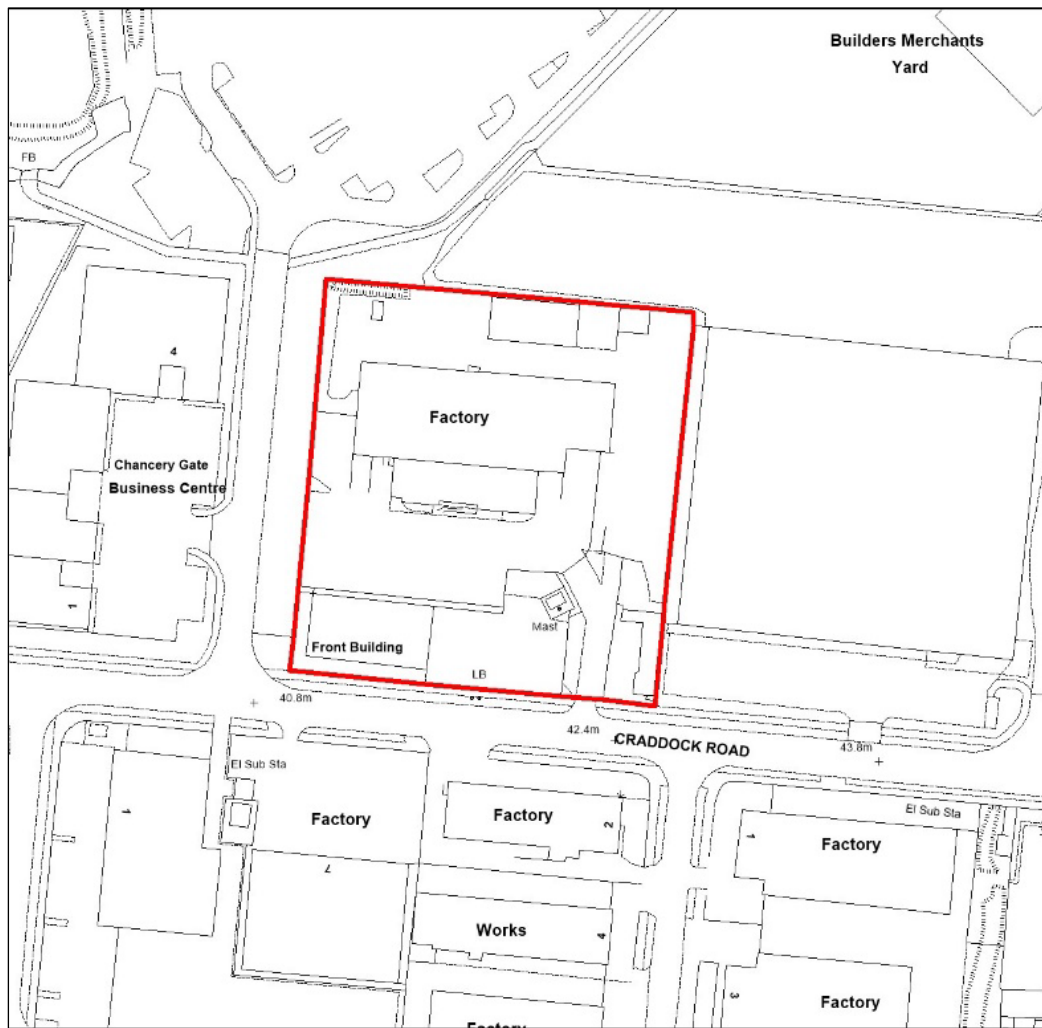


Figure A4.4: Site at Green Park Village, Flagstaff Road

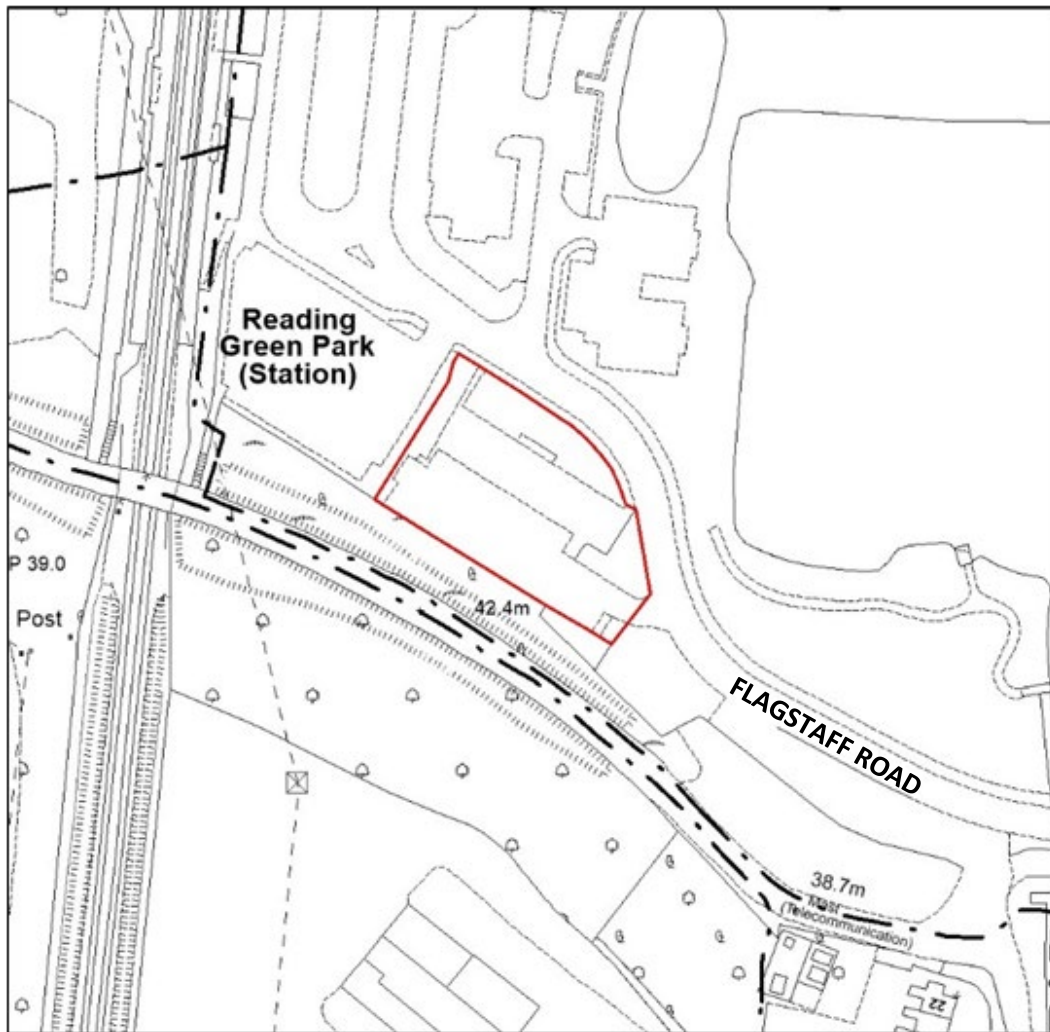


Figure A4.5: 2 Hexham Road

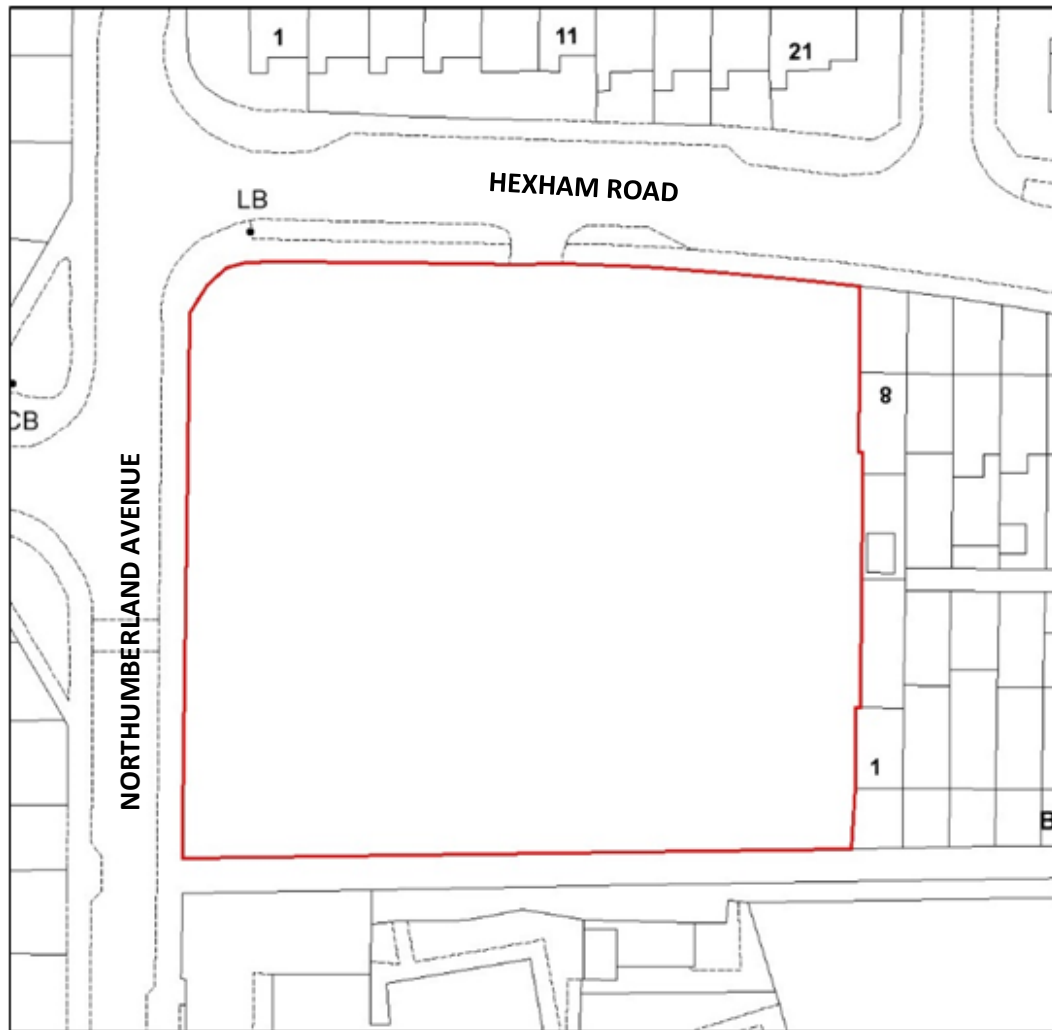
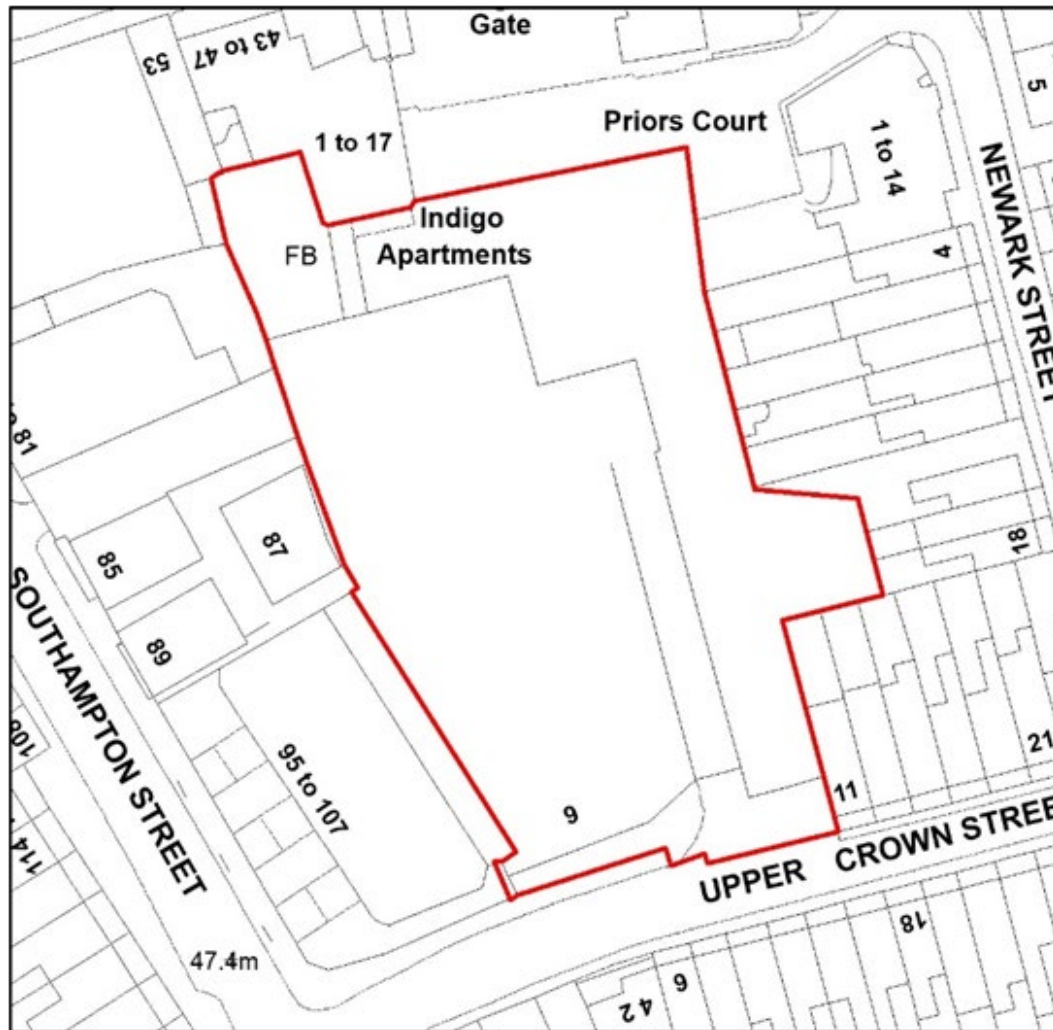


Figure A4.6: Land West of Millford Road



Figure A4.7: Land at 9 Upper Crown Street



Appendix 5: E-mail from National Highways of 22nd May 2025

From: Patrick Blake
To: Worringham, Mark
Cc: Planning-SC, Beale, Glyn, Doyle, Simon, Tackabach, Tom
Subject: 22006 RE: Reading Local Plan Transport Modelling
Date: 22 May 2025 15:37:01

Warning!
For the attention of
RBC, BFC, SC 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

Hello Mark

We have reviewed, please see below:

- updates the comments table (forwarded to Reading BC) to account for Stantec's responses; and
- summarises JSIV's review of traffic flows at M4 Junctions 10, 11 and 12.

The review of traffic flows at M4 Junction 11 accounted for insights gained through the assessment of M4 Junction 11 in connection with the 2040 Wokingham BC Local Plan modelling.

Comment	Stantec Response	Current Status
Figure 2-1 & Table 2-1: Is Junction 4 (Screenline A) correctly identified as 'Bath Road Benyon Court Junction' (rather than 'Bath Road Berkeley Avenue'). If not, traffic flows heading to and from Berkeley Avenue from and to the west via A4 Bath Road are missing.	The figure shows the correct location. The description in Table 2-1 has been updated accordingly.	Resolved.
Tables 2-12 to 2-19: These tables are identical to Tables 2-4 to 2-11. Please provide the correct PM peak hour flow comparison tables.	Tables 2-12 to 2-19 have been updated to provide the correct PM peak hour flow comparison tables.	Resolved.
Table 2-20: Please confirm that this table is correct given Tables 2-12 to 2-19 are identical to Tables 2-4 to 2-11.	Table 2-20 has been updated to reflect the PM numbers. Paragraph 2.7.4 has also been updated accordingly.	Resolved.
Paragraph 2.8.2: It is noted that extensive roadworks were being undertaken in West Reading along the two main corridors of A329 Oxford Road and A4 Bath Road which significantly impacted the model's ability to match the journey times. How would the roadworks have affected traffic demands and traffic routings and therefore the traffic counts?	A comment has been added in paragraph 2.8.3 stating that the counts were undertaken at a different time were unaffected. The following paragraphs explain the extent of the impact by comparing to 2015 data and stating that there are only a couple of small LP sites in this area.	Resolved.
Paragraph 3.2.2: Please forward a copy of 'Sustainable Connectivity and Vehicle Trip Distribution Study Report' (Stantec, December 2024).	Provided by Mark Worringham. No action by Stantec.	National Highways does not appear to have received a copy of 'Sustainable Connectivity and Vehicle Trip Distribution Study Report' (Stantec, December 2024). Please forward.
Table 3-5: The table provides information for IP matrices. However, paragraph 1.2.3 only mentions AM and PM peak hour models. Further, the model verification exercise only presents AM and PM peak hour data. Are there IP models?	All references to the IP have been removed.	Resolved.
Figures 4-1 & 4-2: Please provide more detailed annotated plots showing Reference Case traffic flows and, separately, the Local Plan addition at M4 Junctions 10, 11 and 12 (as shown in Figures 4-1 and 4-2). The plots should be sufficiently detailed (or zoomed-in) so that the flows on each element of each of the three SRN junctions can be easily read.	Plots on all junctions have been provided in Appendix C of the updated Report	See comments below.

M4 Junction 10 – no concerns

- The Local Plan only adds 30-35 trips to total M4 Junction 10 Reference Case flows in the AM and PM peak hours (approximately 0.2% additional traffic). Further, there are no obvious capacity issues at the junction.

M4 Junction 11 – end of plan period issues

- The Local Plan adds significant amounts of traffic to M4 Junction 11 as a whole – approximately 180 trips in the AM peak hour and 110 trips in the PM peak hour. Significantly, only 85 of these trips in both the AM peak hour and the PM peak hour are SRN-related (i.e. use the M4 westbound and eastbound off-slips or on-slips).
- Incidentally, total 2041 Reference Case and Reference Case + Local Plan junction flows are 4%-7% higher overall than the 2040 Reference Case and Reference Case + Local Plan flows associated with the Wokingham Local Plan VISSIM modelling. However, entry flow differences vary significantly – see top table below for comparison. Exit

M4 Junction 11 Inbound Flows: Reading and Wokingham LP traffic flows

Junction Entry	AM Peak Hour						PM Peak Hour					
	Reference Case			Local Plan			Reference Case			Local Plan		
	2040 WBC	2041 RBC	RBC vs WBC	2040 WBC	2041 RBC	RBC vs WBC	2040 WBC	2041 RBC	RBC vs WBC	2040 WBC	2041 RBC	RBC vs WBC
M40 west	1,495	1,972	+32%	1,467	1,977	+35%	1,374	2,111	+54%	1,420	2,121	+49%
A33 north	2,145	2,440	+14%	2,286	2,503	+9%	2,878	3,335	+16%	2,916	3,323	+14%
B3270	1,522	1,170	-23%	1,685	1,321	-22%	1,522	1,277	-16%	1,753	1,314	-25%
M40 east	2,062	2,330	+13%	2,086	2,322	+11%	1,945	1,868	-4%	2,026	1,862	-9%
A33 south	2,916	2,968	+2%	2,955	2,939	-1%	2,285	2,101	-8%	2,337	2,113	-10%
Totals	10,140	10,878	+7%	10,449	11,062	+6%	10,004	10,722	+7%	10,452	10,833	+4%

M4 Junction 11 Outbound Flows: Reading LP traffic flows

Junction Exit	AM Peak Hour						PM Peak Hour					
	Reference Case			Local Plan			Reference Case			Local Plan		
	2040 WBC	2041 RBC	RBC vs WBC	2040 WBC	2041 RBC	RBC vs WBC	2040 WBC	2041 RBC	RBC vs WBC	2040 WBC	2041 RBC	RBC vs WBC
M40 west	Not available	1,724		Not available	1,757		Not available	1,301		Not available	1,313	
A33 north	Not available	3,766		Not available	3,823		Not available	2,987		Not available	3,097	
B3270		1,397			1,355			1,819			1,824	
M40 east		1,829			1,866			1,589			1,594	
A33 south		2,147			2,206			3,006			2,992	
Totals		10,863			11,054			10,712			10,820	

- CD 122 assessments using 2041 Reading Reference Case and Local Plan modelled flows revealed the following potential layout-related issues:
 - The existing M4 westbound merge layout (Layout D) is marginally inadequate (1-2% over-capacity) for both Reference and Reference Case + Local Plan flows in the AM peak hour. Local Plan mainline and merge flows increase by <1% (approximately 40 vehicles). Issues are only likely to start to occur at the end of the Local Plan period, especially given the on-slip flow is likely to be over-modelled (southbound flows on the A33 and Basingstoke Road together towards M4 Junction 11 are over-modelled in the 2024 AM peak hour model).
 - The existing M4 eastbound diverge layout (Layout D Option 2) is marginally inadequate (4% over-capacity) for both Reference and Reference Case + Local Plan flows in the PM peak hour. Local Plan mainline and merge flows increase by <0.1% (5-10 vehicles). Issues are only likely to start to occur towards the end of the Local Plan period, especially given the off-slip flow is likely to be over-modelled (northbound flows on the A33 and Basingstoke Road away from M4 Junction 11 are over-modelled in the 2024 PM peak hour model).
- The first issue was raised as a potential issue in connection with the Wokingham Local Plan.
- VISSIM modelling undertaken to assess the Wokingham BC Local Plan suggested that there could be levels of queuing on the westbound off-slip at M4 Junction 11 in 2040 that will result in an unacceptable safety issue on the M4 westbound mainline without MOVA operations at the M4 Junction 11 roundabout. This is due to the presence of stationary and slow-moving traffic on the main carriageway of the M4. MOVA operations should protect the M4 westbound mainline from unsafe queuing on the westbound off-slip but not without significant implications for the LRN. Reading BC Local Plan traffic flows suggest that a similar issue might develop in connection with the M4 eastbound off-slip.

M4 Junction 12 – no concerns

- The Local Plan only adds 35-40 trips to total M4 Junction 12 Reference Case flows in the AM and PM peak hours (approximately 0.6% additional traffic), almost all of which is LRN rather than SRN -related (i.e. there is little or no additional traffic using the M4 westbound and eastbound off-slips or on-slips).

Conclusions

- The M4 J11 westbound on-slip and eastbound off-slip could need design changes at or towards the end of the plan period without or with Local Plan traffic. The need for design changes depends on how traffic flows change over the next 15 years.
- VISSIM modelling undertaken to assess the Wokingham BC Local Plan suggested that there could be levels of queuing on the westbound off-slip at M4 Junction 11 in 2040 that will result in an unacceptable safety issue on the M4 westbound mainline without MOVA operations at the M4 Junction 11 roundabout. This is due to the presence of stationary and slow-moving traffic on the main carriageway of the M4. MOVA operations should protect the M4 westbound mainline from unsafe queuing on the westbound off-slip but not without significant implications for the LRN. Reading BC Local Plan traffic flows suggest that a similar issue might develop in connection with the M4 eastbound off-slip.

We are happy to discuss.

Kind Regards

Patrick

Patrick Blake, Area 3 Spatial Planner
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Tel: +44 (0) 300 4701043 | Mobile: + 44 (0) 7825 024024
Web: <http://www.nationalhighways.gov.uk>
GTN: 0300 470 1043

From: Worringham, Mark <Mark.Worringham@reading.gov.uk>
Sent: 02 May 2025 12:05
To: Patrick Blake <Patrick.Blake@nationalhighways.co.uk>
Subject: RE: 24982 RE: Reading Local Plan Transport Modelling

Patrick

I have passed your comments below onto our consultants Stantec, and they have responded as set out in the table below

National Highway comments by email 30/4/2025	

Appendix 6: Infrastructure Delivery Gantt Chart



Infrastructure

[illegible]

[illegible]

[illegible]

Residential (dwellings)

Site	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	2034/2035	2035/2036	2036/2037	2037/2038	2038/2039	2039/2040	2040/2041
TOTAL	878	760	575	920	1265	1388	1530	1073	1043	647	631	509	519	519	523	518	518	878
CR11a: Friar Street and Station Road							48	48			7	7	7	7	7	7	7	7
CR11b: Greyfriars Road Corner							15	15	15	15								
CR11c: Station Hill and Friars Walk		184				144	144	144										
CR11d: Brunel Arcade and Apex Plaza											44	43	44	43	44	43	44	43
CR11e: North of Station					183	173	201	319	127	127	127							
CR11f: West of Caversham Road				28	32						7	7	7	7	7	7	7	7
CR11g: Riverside				27	88	94												
CR11i: Napier Court							64	63	63	63								
CR12a: Cattle Market											88	87	87	87	87	87	87	87
CR12b: Great Knollys Street and Weldale Street			166	39	10						14	13	13	13	13	13	13	13
CR12c: Chatham Street, Eaton Place and Oxford Road			54				16	16	15	15	15	15	15	15	15	15	15	15
CR12d: Broad Street Mall				48	148	274												
CR12e: Hosier Street							59	58	58	59	58	58	59	58	58	59	58	58
CR13b: Forbury Retail Park	257	216					176	175	176	175								
CR13c: Forbury Business Park and Kenavon Drive							102	102	102	102								
CR13d: Gas Holder				48	82													
CR14a: Central Swimming Pool, Battle Street				35	21													
CR14d: 173-175 Friar Street and 27-32 Market Place				26														
CR14g: The Oracle Riverside East							78	77	78	77								
CR14h: Central Club, London Street						17												
CR14i: Enterprise House, 89-97 London Street							11											
CR14j: Corner of Crown Street and Southampton Street							4	4	4	4								
CR14l: 187-189 Kings Road								14										
CR14m: Caversham Lock Island, Thames Side							-1											
CR14n: Reading Central Library, Abbey Square							7	7	7	6								
CR14o: 100 Kings Road							13	12	13	12								
CR14p: Queens Wharf, Queens Road							3	3	3	2								
CR14q: Havell House, 62-66 Queens Road							5	4	4	4								
CR14r: John Lewis Depot, Mill Lane							24	24	24	23								
CR14s: 20-22 Duke Street							4	4	4	3								
CR14t: Aquis House, 49-51 Forbury Road											7	6	6	6	6	6	6	6
CR14u: 33 Blagrove Street											4	3	3	3	3	3	3	3
CR14v: 2 Norman Place							40	40	40	40								
CR14w: Reading Bridge House, George Street											24	24	24	24	24	24	24	24
CT14x: Part of Tesco Car Park, Napier Road											9	9	9	9	9	9	9	8
CR14y: Kennet Place, Kings Road							27	26	26	26								
CR14z: Sapphire Plaza, Watlington Street							15	16	15	16								
CR14aa: Part of Reading College, Kings Road											5	5	5	5	5	5	5	4
CR14ab: 160-163 Friar Street							9	9	9	8								
SR2: Land North of Manor Farm Road											156	156	155	156	155	156	155	156
SR3: South of Elgar Road											47	47	47	46	47	47	47	46
SR4a: Pulleyn Park, Rose Kiln Lane											13	12	13	12	13	12	13	12
SR4b: Rear of 3-29 Newcastle Road				-1		9	3	2	3	2								
SR4c: 169-173 Basingstoke Road																		
SR4g: Reading Link Retail Park, Rose Kiln Lane							47	46	46	46								
SR4g: 11 Basingstoke Road											21	21	21	21	21	21	21	21
SR4h: 85-87 Basingstoke Road							4	4	4	3								
SR4i: Land at Warwick House, Warwick Road							3	2	3	2								
SR4j: Former Sales and Marketing Suite, Drake Way							5	5	5	4								
SR4k: Land at Drake Way							7	6	6	6								
WR1: Dee Park			-92			95	95											
WR2: Park Lane Primary School, The Laurels and Downing Road																		
WR3b: 2 Ross Road and Part of Meadow Road											6	7	6	7	6	7	6	6
WR3f: 4 Berkeley Avenue							4	3	4	3								
WR3g: 211-221 Oxford Road																		
WR3h: Rear of 303-315 Oxford Road						13												
WR3i: Land at Portman Way							6	5	6	5								
WR3j: Land at Moulsoford Mews				26														
WR3k: 784-794 Oxford Road																		
WR3l: 816 Oxford Road							7	6	6	6								
WR3n: Amethyst Lane					20													
WR3o: The Meadow Centre, Honey End Lane			-27			58	100	100										
WR3p: Alice Burrows Home, Dwyer Road					15	15												
WR3r: Former Charters Car Sales, Oxford Road							2	3	2	3								
WR3s: Land at Kentwood Hill							10	10	10	10								
WR3t: Land at Armour Hill							3	3	3	3								
WR3u: 132-134 Bath Road							6	5	5	5								

Site	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	2034/2035	2035/2036	2036/2037	2037/2038	2038/2039	2039/2040	2040/2041
WR3v: Former Southcote Library, Coronation Square						19												
WR3w: Part of Tesco Car Park, Portman Road							14	14	14	15								
WR3x: 1-15 St Georges Road											2	2	2	1	2	2	2	1
WR3y: 72 Berkeley Avenue							3	3	3	2								
CA1a: Reading University Boat Club, Thames Promenade							5	6	6	6								
CA1c: Land at Lowfield Road											3	3	3	4	3	3	3	4
CA1d: Rear of 200-214 Henley Rd, 12-24 All Hallows Rd & 7 & 8 Copse Ave							6	5	5	5								
CA1e: Rear of 13-14a Hawthorne Rd & 284-292 Henley Rd							2	3	2	3								
CA1f: Rear of 1-3 Woodcote Road and 21 St Peter's Hill							4	3	4	3								
CA1h: Hemdean House School, Hemdean Road																		
CA2: Caversham Park							39	40	39	40								
ER1b: Dingley House, 3-5 Craven Road							10	9	10	9								
ER1c: Land Rear of 8-26 Redlands Road							4	4	4	5								
ER1d: Land Adjacent to 40 Redlands Road							8	8	8	7								
ER1e: St Patrick's Hall, Northcourt Avenue											14	15	15	15	15	15	15	15
ER1i: 261-275 London Road											1	2	1	2	1	2	1	2
ER1k: 131 Wokingham Road											2	1	2	1	2	1	2	1
ER1l:Princes House, 73A London Road							7	6	7	6								
ER1m: Land adjacent to 17 Craven Road							7	7	7	7								
ER1n: 51 Church Road, Earley											2	2	2	2	2	2	2	2

Non-residential floorspace (sq m) (including retail, employment, hotels and community uses)

Site	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	2034/2035	2035/2036	2036/2037	2037/2038	2038/2039	2039/2040	2040/2041
TOTAL	18851	54020	11407	13037	31339	38125	49236	53464	27946	27946	27125	27125	22897	22897	22897	22897	22897	22897
CR11a: Friar Street and Station Road						1200	1200	1200	1200	1200								
CR11c: Station Hill and Friars Walk		42613				20230	20230	20230										
CR11d: Brunel Arcade and Apex Plaza											188	188	188	188	188	188	188	188
CR11e: North of Station					2817	2817	2817	7045	4228	4228	4228	4228						
CR12e: Hosier Street				1630			158	158	158	158	158	158	158	158	158	158	158	158
CR14m: Caversham Lock Island, Thames Side											125	125	125	125	125	125	125	125
SR1a: Former Landfill, Island Road							8527	8527	8527	8527	8527	8527	8527	8527	8527	8527	8527	8527
SR1b: Island Road A33 Frontage							2426	2426	2426	2426	2426	2426	2426	2426	2426	2426	2426	2426
SR4d: 16-18 Bennet Road					2035													
SR4e: Part of Former Berkshire Brewery Site					15080													
WR3o: The Meadway Centre, Honey End Lane						2471	2471	2471										
ER1i: 261-275 London Road											29	29	29	29	29	29	29	29
ER1k: 131 Wokingham Road											37	37	37	37	37	37	37	37