

Examination of the Reading Borough Local Plan Partial Update

Reading Borough Council Hearing Statement for Matter 2: Housing Need and Requirement

October 2025

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Note: In all Council Hearing Statements, references to the Local Plan Partial Update (LPPU) are to the Pre-Submission Draft Local Plan Partial Update showing tracked changes [LP003b] unless otherwise specified.

Issue 1: Is the LPPU positively prepared, justified, effective and consistent with national policy and guidance with regard to housing need and the housing requirement?

2.1 What is the minimum number of new homes needed over the LPPU's plan period as calculated using the standard method and including the cities and urban centres uplift based on the latest available figures at the point the LPPU was submitted? Are the calculations accurate and do they reflect the PPG's methodology and advice?

2.1.1 At the time that the LPPU was submitted (May 2025) the minimum number of new homes needed over the whole plan period using the standard method including the urban uplift was 14,803, equating to **822 per year**. The Council considers that these calculations are accurate and follow the PPG's methodology and advice (as it relates to the standard method in the December 2023 version of the NPPF, against which the LPPU is examined). The Council is not aware of any views to the contrary, although the standard method figure was different at the time of the Regulation 19 consultation due to the publication of the 2024 affordability ratios in March 2025.

2.1.2 Section 3 of the Housing Provision Background Paper Addendum [EV013] sets out how this calculation follows the methodology step-by-step. In summary, the outcome of each step is as follows:

- Step 1 – setting the baseline – 501.1
- Step 2 – an adjustment to take account of affordability – 609.1
- Step 3 – capping the level of any increase – 609.1
- Step 4 – cities and urban centres uplift – 822.4

2.2 Having had regard to the PPG, are there any exceptional circumstances in Reading which justify an alternative approach to following the standard method in its entirety, including the cities and urban centres uplift? If so, what are they, are they supported by robust evidence, and what should the housing requirement for Reading be?

2.2.1 The Council considers that there are exceptional circumstances in Reading that justify an alternative approach to the standard method in line with paragraph 61 of the NPPF. These circumstances are set out in Section 3 of the Housing Provision Background Paper [EV012] and consist of a demographic case and case around the circumstances of Reading in relation to other urban uplift authorities.

2.2.2 The demographic case is the more important of the two, and in the Council's view would be sufficient to justify an alternative approach on its own. Although it is summarised in paragraphs 3.3 to 3.6 of the Housing Provision Background Paper, the full evidence to support it is in Appendix A of the Housing Needs Assessment [EV011].

2.2.3 The demographic case is that the 2014-based sub-national population projections upon which the 2014-based household projections and therefore the standard

method are based, made no allowance for unattributable population change (UPC) in the period 2008-2011. UPC is used in the mid-year population estimates to reconcile with Census data, but the results of the 2011 Census showed a vastly greater increase in population in Reading between 2001 and 2011 than the mid-year population estimates, with only four local authorities outside London showing a larger revision due to UPC than Reading. This meant essentially that the 2014-based population projections, and therefore the demographic basis for the standard method, under-estimates migration to Reading to an exceptional degree compared to other authorities.

- 2.2.4 This leaves Reading in the position of Steps 1-3 of the standard method resulting in a housing need that is too low, and that applying step 4, the urban uplift is what takes the figure into a position of being higher than what the locally-assessed need would be. This is a highly unusual position, and means that the demographic basis for the standard method is particularly flawed for Reading, constituting an exceptional circumstance. This would continue to be the case with the revised standard method figure described in answer to question 2.1, which uses the same demographic basis and is actually lower than the results of the standard method at the time of the HNA.
- 2.2.5 The case around the circumstances of Reading in relation to other urban uplift authorities is that Reading is in a unique position among the cities and urban centres subject to the urban uplift (outside London) in having an unusually high proportion of the urban area that justifies its position on the list outside the core authority. In turn this means that Reading is by far the smallest authority by both area and population outside London among the authorities subject to the uplift. This significantly restricts the ability to meet uplifted need within Reading's boundaries and means a greater reliance on the voluntary agreements identified in NPPF paragraph 62, making delivery of the need as generated by the standard method within the wider urban area highly unlikely. The Housing Provision Background Paper [EV012] sets out this evidence in full.
- 2.2.6 Whilst a number of representations at Regulation 19 stage [LP007] are made relating to the topic of housing need, a very limited number of these specifically challenge the exceptional circumstances themselves.
- 2.2.7 The only representation that appears to the Council to deal with the substance of the demographic case is that from Reading Heights Ltd and MYCO Ltd. This challenges the use of 2018-based population projections as the Government had already rejected them as the basis for the standard method as it would not deliver the net additional homes target, and it would be limited in its ability to address affordability challenges. However, the fact that the Government does not consider that nationwide use of these projections would deliver the national target does not mean that they are an inaccurate measure of need on a local basis, and their use is not restricted in national policy, which requires consideration of current and future demographic trends. The demographic basis would not be able to address affordability challenges on its own, which is why the HNA, taking account of market signals as required by paragraph 62 of the NPPF, includes additional allowances for concealed families and suppressed household formation (see paragraph 2.2.11).

- 2.2.8 Other representations, insofar as they deal with the exceptional circumstances at all, deal with the secondary element only, i.e. the case around the circumstances of Reading in relation to other urban uplift authorities. The main arguments used in representations here are that the circumstances are not exceptional because the intention is to prioritise delivery in large urban centres such as Reading¹, and because it is not exceptional for a large amount of the urban area to fall outside the core authority and the percentage growth in dwellings that would result is not atypical².
- 2.2.9 The Council recognises the purpose of the urban uplift, and shares the aim of delivering homes in large urban centres such as Reading where there is capacity to do so. However, the Housing Provision Background Paper demonstrates why the application of such an arbitrary approach has created a particular set of exceptional circumstances in Reading. This also demonstrates the degree to which Reading differs substantially from the situation of the other authorities outside London, being 28-30% smaller than the next smallest in terms of both area and population, and that this creates a particularly unusual case. It is not disputed that the level of growth under the standard method would be the same as for other urban uplift authorities, which is to be expected as the same method is applied.
- 2.2.10 Where exceptional circumstances have been identified, paragraph 61 of the NPPF allows for an alternative approach to assessing housing need. Such an alternative approach has been used in Reading, and the Council considers that the need for housing in Reading is **735 homes per year** between 2023 and 2041. This is based on the evidence set out in the Housing Needs Assessment.
- 2.2.11 The methodology ORS used to calculate this level of need can be summarised as follows:
1. Based on ONS 2018-based household projections, but using the 10-year migration trend variant of the projections to ensure greater stability.
 2. An adjustment is made to take account of the 2021 Census and mid-year population estimates.
 3. An allowance is made for a certain proportion of new homes to be vacant or second homes.
 4. Growth in the past 20 years in concealed families, i.e. couples or lone parents who would expect to lead their own households living with other households, is considered to be additional need.
 5. An allowance is made for suppressed household formation, i.e. household formation rates for young people will increase progressively towards 2001 levels.
 6. An allowance is made for additional homes needed to support the jobs growth identified in the Cambridge Econometrics forecast.
- 2.2.12 The contribution made by each element above to the final identified level of need is set out in Figure 1.

¹ Home Builders Federation, John Lewis Partnership, Reading Heights Ltd and Myco Ltd, Sorbon Estates Ltd, Viridis Real Estate

² Tilehurst People's Local Charity, USS Investment Management Ltd

Figure 1: Elements of objectively assessed need for Reading 2023-2041 (from Housing Needs Assessment by ORS)

READING	Annual Need
ONS 2018 based household projections: 10-year migration trend	330
Adjustment for Census and Mid-year population estimates 2021	+65
Vacancy rate Applied	+26
C2 Dwelling equivalent	+8
Concealed families	+48
Suppressed household formation/Pent-up demand	+85
Demographic and Backlog of Need Total	562
In-migration to meet Jobs Target	+173
TOTAL	735

2.2.13 Paragraph 61 of the NPPF states that, where an alternative approach is used, it should reflect current and future demographic trends and market signals. In terms of demographic trends, elements 1 and 2 in paragraph 2.2.11 above fulfil this requirement, with the level of migration in the 2018-based projections adjusted to ensure greater stability. The market signals are incorporated in elements 3, 4 and 5, with concealed families and suppressed households being particularly significant detrimental outcomes of the market factors in Reading.

2.2.14 However, based on the Housing and Economic Land Availability Assessment [EV015 and EV016], capacity has been identified for a higher number of homes between 2023 and 2041, consisting of **825 homes per year**. The justification for this number is explored further in answer to question 2.6.

2.2.15 Paragraph 67 of the NPPF states that

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”

2.2.16 Therefore, national policy enables the LPPU to plan for a higher figure than the identified housing need. The reason for this is not based on the two examples given in the NPPF, as provision for neighbouring areas is not included and an allowance for jobs growth is already made in the need figure. Instead, the purpose of this is to reflect Reading’s ability to deliver homes to help to address the overall national need beyond the level of need identified in the HNA, in a location which is highly accessible by sustainable modes of travel and which is already well provided by infrastructure and services. This helps to achieve the Government’s objective of significantly boosting the supply of homes (NPPF paragraph 60), as well as mitigate climate change by making effective use of land in urban areas (paragraph 11 a)).

2.2.17 Therefore, the housing requirement for Reading should be **825 homes per year** between 2023 and 2041, a total of 14,850, reflecting Reading’s assessed capacity.

- 2.3 *The PPG refers to the expectation that the increase in the number of homes to be delivered in cities and urban centres is delivered in those areas, rather than the surrounding areas, unless it would conflict with national policy and legal obligations. Would there be any conflict with national policy and legal obligations if the cities and urban centres uplift was applied?*
- 2.3.1 Application of the cities and urban centres uplift at the time of submission, as set out in answer to question 2.1, would result in a housing need (822 per year) that is slightly below proposed housing provision (825 per year). As such there would not be any conflict with national policy and legal obligations if it were applied, because it would be delivered entirely within Reading's boundaries and the HELAA process has demonstrated that there is capacity to do so after consideration of suitability, availability and achievability.
- 2.3.2 The only situation where there may be a conflict with national policy would be if the standard method calculation at the time that the Regulation 19 consultation was undertaken was applied, although there would still be no conflict with legal obligations. The standard method at the time would have resulted in a need of 878 homes per year. As shown in the HELAA [EV015], Reading's assessed capacity is for 825 homes per year which would have resulted in a shortfall of 954 homes total over the plan period 2023 to 2041.
- 2.3.3 The Council believes that delivering 878 homes per year within Reading's boundaries likely would likely have conflicted with national policy. Since the LPPU has identified exceptional circumstances for use of an alternative need figure, and since the standard method figure at the point of submission was lower than the proposed provision, this has not been explored in depth in the evidence base. However, Section 5 of the HELAA does consider the implications of the most likely alternative approaches to generate higher housing numbers, around flood risk, changing densities and a different balance between office and residential on mixed use sites.
- 2.3.4 In terms of flood risk, the HELAA calculates that making greater use of sites in Flood Zone 3a where the indications are that the Exception Test would not be passed, generally because of the inability to secure safe access to areas outside Flood Zone 3a, would deliver an additional 105 homes over the plan period, a small contribution that could have significant flood risk implications. Therefore, use of these sites would likely be contrary to paragraph 170 b) of the NPPF, which states that:
- "the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."*
- 2.3.5 The HELAA demonstrates that, in order to eliminate the theoretical shortfall of 954, an increase in pattern book densities of around 20% would be required. This is a considerable increase, particularly given that, in town centre locations in particular, density of new development is already high and would likely result in developments that are out of character with their surroundings, contrary to paragraph 130 of the NPPF which states:

“In applying paragraphs 129a and b above to existing urban areas, significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area.”

- 2.3.6 These impacts on character would further conflict with paragraph 135, as would the likely compromises in layout that such an increase in density would result in.

“Planning policies and decisions should ensure that developments:

...

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

...”

- 2.3.7 There would likely be further impacts of density increases that would vary from site to site, and may include:

- harm to the significance of heritage assets and their setting contrary to NPPF paragraphs 206 and 207;
- harm to important landscapes contrary to paragraphs 135 c) and 180 a); or
- detrimental effects on the amenity of existing or future residents through impacts on daylight, sunlight, privacy or overbearing effects, contrary to paragraph 135 f), which would also affect quality of life, conflicting with paragraph 96 b).

- 2.3.8 Rebalancing mixed use sites in favour of residential over offices would result in a failure to meet identified needs for employment development. The LPPU plans to meet the identified office needs, but there is no identified surplus over identified needs, and meeting those needs is also highly dependent on existing permissions coming forward. Changing the general 50/50 residential and office split assumed by the HELAA to a 75/25 split in favour of residential would result in 227 additional dwellings but a reduction of 20,175 sq m office floorspace, which is a very significant reduction in the context of the overall level of need, whilst not even addressing a third of the theoretical shortfall in meeting the former standard method figure.

- 2.3.9 Although not tested in the HELAA, the same would apply to greater use of employment land occupied mainly by industrial and warehousing to provide more housing. The LPPU does not meet the identified industrial and warehouse needs fully on identified sites, and relies upon the potential for intensification to meet those needs. If further employment land were to be lost to housing, this would prevent those identified needs from being met.

- 2.3.10 Failing to meet these identified needs would be contrary to paragraph 11 of the NPPF which states that:

“For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

...

2.3.11 It would also fail to support economic growth and productivity as required by paragraph 85:

“Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.”

2.3.12 Furthermore this approach would also be contrary to paragraph 86:

“Planning policies should:

...

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

...

2.3.13 Any attempt to yield a significant increase in housing supply through use of undeveloped land would also be expected to conflict with the NPPF. There is little undeveloped land in Reading, and that which exists generally falls within one or more of the following categories, development of which would conflict with the listed paragraphs of the NPPF:

- Local Green Space – paragraph 107;
- Other recreational public open space – paragraph 103;
- School playing fields – paragraph 103;
- Priority habitats and local wildlife sites – paragraph 185 b);
- Land within the functional floodplain – paragraph 165;
- Cemeteries – paragraph 97 c);
- Allotments – paragraph 96 c); and
- Land within the Detailed Emergency Planning Zone for AWE Burghfield – paragraph 101 b).

2.3.14 There are no other significant options for uplifting housing supply, as explored in the answer to question 2.5. Therefore, the Council maintains that achieving the results of the standard method at the time of the Regulation 19 consultation, which has now changed in any case, would have conflicted with national policy.

2.4 Do paragraph 11 of the Framework and the policies within footnote 7 of the Framework provide a strong reason for restricting the overall scale, type or distribution of development in the LPPU's area?

- 2.4.1 The Council is not seeking to rely on paragraph 11 b) i of the NPPF (including footnote 7) to restrict the overall scale, type and distribution of general housing and commercial needs because it is planning to meet those needs within its boundaries. This is the case based on the level of need identified in the Housing Needs Assessment [EV011] as well as the result of the standard method at the time of submission. Unmet housing needs only arise if the previous results of the standard method at the time of the Pre-Submission Draft LPPU are used.
- 2.4.2 In terms of paragraph 11 b) i, the areas or assets of particular importance that apply in Reading are limited to:
- Local Green Space;
 - Irreplaceable habitats (ancient woodland and ancient or veteran trees only);
 - designated heritage assets; and
 - areas at risk of flooding.
- 2.4.3 Of these assets, only designated heritage assets and areas at risk of flooding have had any significant impact in terms of affecting the conclusions of capacity on potential development sites. This is quantified to some degree in section 5 of the Housing and Economic Land Availability Assessment [EV015] for flood risk, which demonstrates that the impact of flood risk in terms of Flood Zone 3a sites on overall supply was relatively limited, albeit larger areas of land were excluded from further consideration on the basis of being in Flood Zone 3b. The effect of consideration of harm to the significance of heritage assets has not been quantified, in particular since it is often part of a balance of considerations, but it is likely to have restricted the capacity of some sites particularly in the town centre.
- 2.4.4 In relation to paragraph 11 b) ii, the answer to question 2.3 has already explored how accommodating the level of housing need identified in the standard method at the time of the Pre-Submission Draft LPPU would conflict with policies in the NPPF.
- 2.4.5 It is also worth noting that the LPPU does not seek to restrict the overall scale of development, because relevant policies are not worded in a way that would have that effect. Policy H1 seeks the provision of at least 825 homes per year. If additional dwellings can be delivered over the plan period without conflicting with national or local policies, the LPPU would not prevent this.

2.5 Are there any reasonable alternative spatial strategies for Reading which could result in a material difference with regard to any unmet housing need under the standard method which remains to be positively accounted for?

- 2.5.1 As previously stated, at the point of submission there would be no unmet need under the standard method.
- 2.5.2 Options for alternative spatial strategies to deliver significantly higher levels of housing are limited within Reading due to its restricted boundaries and built-up nature. There are no opportunities for urban extension within Reading's boundaries,

and sites that have been put forward are generally included within the LPPU unless there are strong reasons not to.

2.5.3 At the time of the Housing and Economic Land Availability Assessment (HELAA) [EV015] the standard method would have resulted in a need of 878 homes per year, and the results of the HELAA identified that reliance on the standard method would result in a shortfall of 954 dwellings. Section 5 of the HELAA contains the assessment review, in which the implications of changing approaches or assumptions are considered. This identified the following alternative assumptions together with their implications:

- **Flood risk:** Some sites within Flood Zone 3a were considered unsuitable due to being unlikely to pass the exception test. If this issue were overcome, it would deliver only around 100 additional dwellings.
- **Changing densities:** Differing assumptions about densities within the pattern book approach of the HELAA were tested, and in order to eliminate the theoretical shortfall under the standard method at the time, increases in pattern book densities of around 20% would be required.
- **Residential and office balance – increasing housing:** For those sites where the HELAA (and, as a result, the LPPU) expects a mix of office and residential uses, usually split at 50/50, the potential reduction of office floorspace and corresponding increase in residential was tested. For instance, a 75/25 split in favour of residential would result 227 additional dwellings but a reduction of 20,175 sq m office floorspace. Therefore any significant boost in housing supply from this source would prevent Reading from meeting its identified office needs.

2.5.4 Looking at alternative spatial strategies more broadly, delivering a significant uplift in housing supply within Reading's boundaries would require one or more of the following options to be pursued:

- Redevelopment of employment land;
- Further development of undeveloped land; and
- Significant increase in densities.

2.5.5 **Redevelopment of employment land**

There are approximately 248 hectares of employment land in Reading providing almost 900,000 sq m of floorspace, primarily located in the south and west of the Borough. There is already some use of this land for housing proposed (e.g. sites SR2, SR3, SR4a, SR4c and WR3b). Reallocation and redevelopment of a larger portion of this land could deliver additional homes. However, doing so would prevent Reading from meeting its needs for employment land. The Commercial Needs Assessment [EV006] has identified a significant level of need for industrial and warehouse space, and meeting these needs relies upon retaining existing important land (the Core Employment Areas), new allocations such as those in policy SR1 and scope for intensification within existing employment areas. There is no significant further scope for use of employment land for housing without meaning that Reading cannot meet its employment needs within its boundaries.

2.5.6 Further development of undeveloped land

Undeveloped land in Reading falls mainly into two categories – recreational public open space such as parks, and the flood meadows of the Thames and Kennet rivers. Most recreational public open space in Reading is identified as either Local Green Space or Public Open Space under policy EN7, and provides important facilities for sports, leisure and recreation for local residents, the retention of which is important for the health and well-being of the local community as set out in paragraph 102 of the NPPF. Meanwhile the flood meadows of the Thames and Kennet are almost entirely within the functional floodplain and unsuitable for residential development. Much of the remaining undeveloped land consists of important habitats, school playing fields, cemeteries or allotments. There is also some undeveloped land around Green Park and M4 Junction 11 that falls within the Detailed Emergency Planning Zone for AWE Burghfield and is therefore not considered suitable for residential development. Remaining land generally consists of highways verges and small pieces of amenity land within residential areas. Whilst there is some limited potential for use of undeveloped land (and there are some small sites identified in the LPPU), use of such land as a key element of a spatial strategy would involve significant loss of some of the categories identified. Appendix 1 contains a breakdown of all undeveloped land in Reading.

- 2.5.7 Ultimately, those sites where there could have been significant potential for development (including the whole of the undeveloped Thames and Kennet Meadows other than those areas used for recreational public open space) were all considered through the HELAA process and, where considered suitable, available and achievable, would have been brought forward as site allocations.

2.5.8 Significant increase in densities

The impacts of increasing density assumptions are set out in section 5 of the HELAA and referred to in paragraph 2.5.2 above. It shows that significantly increased densities would be necessary to eliminate the theoretical shortfall in meeting the standard method needs at the time of the Regulation 19 consultation. This is over and above density assumptions that are based on recent development that is already making highly efficient use of available land and developing at high density in the town centre. Further significant increases in these densities would be likely to have significant impacts in terms of the character of Reading, identified heritage assets and important landscapes, the provision of landscaping, open space and urban greening on new developments and/or amenity impacts on existing or new residents through loss of daylight and sunlight, privacy or overbearing effects.

- 2.5.9 The Council will comment on the more specific implications of increasing densities on individual sites or as part of the minimum densities in policy H2 when those matters are discussed.
- 2.5.10 Therefore, the Council does not consider the above broad alternative spatial strategies to be reasonable, as they would inevitably result in significant impacts that would not be capable of mitigation through the LPPU.

2.6 Is the housing requirement figure of 14,850 homes by 2041 (approximately 825 per annum) in Policy H1 justified?

- 2.6.1 The housing requirement figure of 14,850 homes by 2041 is justified.
- 2.6.2 The definition of 'justified' under paragraph 35 of the NPPF has two elements, that it is an appropriate strategy, taking into account the reasonable alternatives, and that it is based on proportionate evidence.
- 2.6.3 In terms of the requirement being **an appropriate strategy**, the Sustainability Appraisal of the Pre-Submission Draft LPPU identifies three reasonable alternatives to the housing requirement figure in policy H1:
- H1(ii) – 689 homes per year: This would carry forward the existing housing requirement. However, it would not have been an appropriate strategy given the changes to national policy including a standard methodology and the new evidence on housing need in the Housing Needs Assessment (HNA) [EV011];
 - H1(iii) – 878 homes per year: This would have used the standard method figure at the time of the Pre-Submission draft. This standard method figure had changed to 822 per year at the time of Submission. This option was not carried forward because, on the basis of the evidence set out in the Housing and Economic Land Availability Assessment (HELAA) [EV015 and EV016] no capacity was identified to accommodate this requirement in full.
 - H1(iv) – 735 homes per year: This approach would have limited the provision figures to the need identified in the HNA. However, with the HELAA having evidenced that further capacity was available, this approach would not have made any contribution to significantly boosting housing supply to support NPPF paragraph 60 and would have artificially restricted supply without being justified by the policies specified in paragraph 11 a) of the NPPF.
- 2.6.4 Within the capacity assessment in the HELAA, the effect of alternative approaches are considered in terms of flood risk, changing densities and an alternative balance of office and residential on mixed use sites. These are summarised in answer to question 2.5.
- 2.6.5 The approach set out in policy H1 is therefore considered to be an appropriate strategy, taking into account the reasonable alternatives.
- 2.6.6 The Housing and Economic Land Availability Assessment (HELAA) EV015 and EV016] provides the **proportionate evidence** to support the housing requirement figure.
- 2.6.7 The HELAA is based on a methodology jointly developed with West Berkshire District Council, Wokingham Borough Council, Slough Borough Council and the Royal Borough of Windsor and Maidenhead, and following the approach set out in Planning Practice Guidance on housing and economic land availability assessment. It is the same broad methodology as used for the existing adopted Local Plan, which also based its housing provision figure on the identified capacity from the HELAA.
- 2.6.8 The full HELAA methodology is set out in the document itself, and does not need to be repeated here. However, it is important to note that it includes all known potential

development sites, and sites assessed in the HELAA cover 18% of the total area of Reading Borough. It is therefore as comprehensive an assessment of capacity as could be undertaken at this stage.

- 2.6.9 The Council is aware that a number of representations have been submitted that challenge the outcome of the HELAA on specific sites and usually argue that more homes can be accommodated on those sites. We will respond to points on individual sites as and when these arise at Stage 2, but it is important to state that the HELAA does not purport to be the final word on what each individual site can accommodate, as that will require a level of technical work that can only reasonably be undertaken at planning application stage. This is why the capacity for each site is expressed as an indicative range in the individual allocations. What the HELAA seeks to do is apply a consistent set of considerations and assumptions across the Borough to arrive at what is in overall terms a challenging but realistic housing capacity figure, even if some individual sites end up delivering more or fewer homes. This is considered to be a proportionate approach to assessing capacity.
- 2.6.10 The Council also notes that there are views that the pattern book densities used should be higher to reflect the statement in paragraph 129 a) that standards should seek a significant uplift in the average density of residential development. The densities used are based on what has been achieved in recent developments, but the context is that developers in Reading already usually seek to maximise what can be achieved on site, and therefore the densities achieved in recent developments already reflect what has been assessed as the maximum that sites can accommodate after consideration of the relevant constraints. In any case, this is already a significant uplift over what is already on the ground.
- 2.6.11 Therefore, the housing provision figures in policy H1 are considered to be based on proportionate evidence.

Issue 2: Is the LPPU positively prepared, justified, effective and consistent with national policy and guidance with regard to provision for Gypsies, Travellers, and Travelling Showpeople?

- 2.7 *Did the Review of the Reading Borough Local Plan 2019 (March 2023) [LP011] consider whether there was a need to update the Council's evidence base (dating from 2017) on the needs of Gypsies, Travellers, and Travelling Showpeople? If not, why not?*
- 2.7.1 The Local Plan Review [LP011] was conducted on the basis of whether individual policies required an update. It therefore considered whether policy H13 (Provision for Gypsies and Travellers) required an update, which, if so, would have entailed an update of the evidence base including a new or updated assessment of need.
- 2.7.2 Paragraphs 3.473 to 3.483 of the Local Plan Review [LP011] in March 2023 sets out the consideration of whether policy H13 required an update, covering legislative changes, national policy changes, other policy changes, monitoring data, appeals and other changes in circumstances, none of which pointed towards a need for the policy and its supporting evidence base to be updated. Following the same approach did identify the need for evidence on general housing need to support policy H1 to be

updated, in particular because national policy on how such needs were to be assessed had significantly changed since the Local Plan was adopted, but this was not the case for Gypsies and Travellers.

2.7.3 There were subsequently changes made to Planning Policy for Traveller Sites (PPTS) in December 2023, as described in answer to IQ34 of the Council's Response to Initial Questions [EX002]. However, as described in that answer, this did not require an update of the existing needs assessment as it already contained an assessment of need that would accord with PPTS in the shape of the 'cultural need' for 17 pitches.

2.7.4 Paragraph 31 of the NPPF states that the evidence to support review of policies should be up-to-date but also proportionate. The level of need for Gypsy and Traveller provision identified in 2017 is modest and was not considered likely to have significantly changed given that it stems from a small number (around 20) households known to the Council who are housed in bricks and mortar accommodation, and applying national assumptions around how many would prefer to live on a site because the households were not able to be contacted. For the purposes of housing need more generally, paragraph 33 of the NPPF states that relevant strategic policies will need reviewing if need has changed significantly, and for the reasons set out above this was considered unlikely to be the case. As a result, policy H13 and its supporting evidence was not considered to be in need of update.

2.8 Does the LPPU provide a supply of specific deliverable sites for Gypsies, Travellers, and Travelling Showpeople sufficient to provide 5 years' worth of sites against locally set targets? Have any recent permissions addressed short-term needs for pitches and plots? What provision is made for years 6 to 10 of the plan period, and, where possible, for years 11 - 15? Have any windfall sites come forward in recent years?

2.8.1 The LPPU does not have a supply of specific deliverable sites for Gypsies, Travellers and Travelling Showpeople to provide 5 years' worth of supply. There are no sites identified in the LPPU and no existing planning permissions for permanent accommodation.

2.8.2 The Gypsy, Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment was finalised in June 2017 and identified the following needs:

- Permanent pitches totalling between 10 (using the Planning Policy for Traveller Sites definition of need) and 17 (using cultural need) pitches;
- A transit site capable of accommodating 5 pitches; and
- 2 additional plots for travelling showpeople.

2.8.3 The Council went to substantial lengths to try to identify sites to meet this need as part of the process of preparing the now-adopted Local Plan. Appendix 2 contains the Gypsy and Traveller Provision Background Paper (2017) which was part of the evidence supporting the submission of the Reading Borough Local Plan, and details this background up to the point of submission. It outlines the following:

- The process undertaken with regard to privately owned sites including the specific requests made for sites for Gypsies and Travellers to be nominated as

part of the Call for Sites in January 2016 and the Draft Local Plan consultation in May 2017, as well as writing to landowners of proposed development sites to enquire about the potential to include Gypsy and Traveller provision, which resulted in no sites being identified.

- The approach to Council-owned land, which involved examining 80 Council-owned sites (excluding sites identified as protected open space, statutory allotments and those occupied by in-use buildings), after which only one potential site at Cow Lane was identified.

2.8.4 The Cow Lane site was subsequently consulted upon in September 2017 as a potential inclusion in the Local Plan, and was included in the Submission Draft in March 2018. However, the proposal was abandoned when it became clear that the site was required for use by Reading Festival, and a main modification deleted the site from the Local Plan. The site now forms the car park for the new River Academy secondary school, so no longer has any development potential.

2.8.5 The above background is included in order to explain the position of the Reading Borough Local Plan in not being able to make provision for the permanent needs. Little has changed since this work was carried out in terms of potential sites. No further sites have been put forward during the LPPU Call for Sites or consultation stages for Gypsy and Traveller provision. There are no additional sites owned by the Council that can be considered, and several of the 80 Council-owned sites considered have now been developed for an alternative use (sites 1, 2, 4 and 75).

2.8.6 In terms of transit needs, a planning permission (PL/21/2037) was granted in March 2023 for the provision of a transit site for 7 pitches on land at Island Road, which would meet the transit needs in full. This was brought forward by the Council on Site 74 of the 80 Council-owned sites identified in the Gypsy and Traveller Provision Background Document in Appendix 2, following further analysis of the transit potential of these sites and feasibility work. This further analysis was undertaken because the initial analysis did not take account of the fact that Annex 3 of the NPPF differentiates in terms of flood risk vulnerability between caravans intended for permanent residential use (highly vulnerable) and sites used for holiday or short let caravans (more vulnerable), meaning that in the Council's view there was potentially a route to developing a transit site in Flood Zone 3 but not a permanent site, albeit the Environment Agency did not agree with this interpretation. However, this permission has not yet been implemented and the Council has no current plans to take it forward.

2.8.7 Even without the Island Road site, transit provision, if it is to be made in a way that would meet the need effectively, would need to be within Reading Borough. This is because the enhanced enforcement powers under section 62a of the Criminal Justice and Public Order Act 1994 (as amended) to remove vehicles only apply if an alternative site is available within the same local authority area.

2.8.8 There is an existing Travelling Showpeople's site on Scours Lane, and paragraph 4.4.109 of the LPPU states that this could be expanded as the need for two plots would be unlikely to support a new site on its own. This site was vacated and placed on the market in 2022, but the permitted use is for a showman's yard and winter

quarters as confirmed through a Certificate of Lawfulness (PL/06/0287) granted in September 2006. There is no other lawful use, and bringing forward an alternative use would be heavily constrained by 98% of the site being located in the functional floodplain. There are some small areas adjacent to the site which are at lower flood risk where limited expansion may be possible.

2.8.9 No recent permissions have addressed the need for permanent pitches, with the only recent permission being for transit pitches. There has only been one planning application for permanent pitches for Gypsies and Travellers within the timeframe of the Council's application records system, which dates back to the 1990s. Application PL/14/1097 for two pitches at land adjacent to 41-43 Brybur Close was refused in 2014 and a house was developed on the site. There are no existing permanent Gypsy and Traveller Sites in Reading, either authorised or unauthorised, no tolerated stopping sites and, given the lack of any history of interest in providing such sites, no realistic likelihood that windfalls will come forward over the plan period.

2.8.10 All of the above illustrates why there is no likelihood that permanent accommodation needs for Gypsies and Travellers would be met in Reading over the plan period, and why this situation was considered to be unchanged at Local Plan Review stage.

2.9 How were the accommodation needs of Gypsies, Travellers and Travelling Showpeople considered through the wider site allocation process within the LPPU? Was the site selection process for allocations robust and consistent? Did the site selection process consider all potential sources of sites?

2.9.1 The LPPU did not seek to address Gypsy, Traveller and Travelling Showpeople needs through site allocations in a way that was distinct from the wider site allocation process.

2.9.2 The site allocation process in the LPPU commenced with a Call for Sites which took place between April and June 2023. Whilst this resulted in 17 sites being nominated for development, none of these were proposed for Gypsy, Traveller or Travelling Showpeople use, and there was very limited suitability among those sites for such a use given that most were town centre sites proposed for high density residential development. No further sites for Gypsy, Traveller or Travelling Showpeople use were suggested for allocation in the subsequent Regulation 18 or Regulation 19 consultations.

2.9.3 The Housing and Economic Land Availability Assessment (HELAA) [EV015 and EV016] was the main tool for assessing potential site allocations. This did not consider sites for Gypsies, Travellers and Travelling Showpeople as a separate category as there had been no sites suggested, permitted or refused for such a use, and because updating policy H13 was not within the scope of the LPPU.

2.9.4 During the production of the now adopted Local Plan, the consideration of sites for Gypsies and Travellers (Travelling Showpeople were distinct as there is an existing site in Reading) was carried out separately from the HELAA. The background to how this was undertaken is described in answer to question 2.8, but it involved consideration of all potential Council-owned sites as well as specific requests to private landowners.

- 2.9.5 This process was not repeated to support the LPPU as the outcome of the search would not have been substantively different. The Council has not acquired any additional land to assess, and none of the 80 Council sites previously considered have become available or suitable in the time since the assessment. No additional privately-owned sites had emerged through the Call for Sites or the HELAA that had any clear suitability for Gypsy and Traveller accommodation. Appendix 3 sets out the additional proposed development sites that have emerged since the 2017 version of the HELAA (other than those covered by planning permissions which are assumed to not be available) and contains a brief comment on their likely suitability for Gypsy and Traveller accommodation.
- 2.9.6 The HELAA process, which, whilst it did not consider sites for Gypsies and Travellers separately, did seek to identify all potential development land, considered all potential sources of site. It covered the following
- Existing development plan allocations;
 - Sites with existing planning permission or resolution to grant permission subject to Section 106;
 - Undetermined planning applications;
 - Expired planning permissions;
 - Refused or withdrawn planning applications;
 - Pre-application enquiries;
 - Sites considered within previous version of the HELAA;
 - Sites nominated as part of the Local Plan process;
 - Sites on the latest Brownfield Land Register;
 - Council-owned sites with development potential;
 - Vacant and derelict sites;
 - All existing employment areas;
 - All undeveloped land outside the urban area; and
 - Sites known for any other reason.
- 2.9.7 In terms of Gypsies, Travellers and Travelling Showpeople, no sources of sites were considered that differed from the site identification process in the HELAA which fed into the site allocations. This is because there are no additional sources of site for those categories. There are, for instance, no tolerated stopping sites or long-term unauthorised encampments. Unauthorised encampments in Reading generally take place in public parks or car parks on land which is already in use.
- 2.9.8 The Council can therefore be very confident that it has not overlooked a site within its boundaries which would be suitable, available or achievable for permanent accommodation for Gypsies and Travellers.

Appendix 1: Breakdown of undeveloped land in Reading

The table below identifies the degree to which undeveloped land in Reading (excluding residential gardens) is constrained or in existing use.

Table A1.1: Breakdown of undeveloped land (excluding residential gardens) in Reading

Type of land	Area (ha) ³	% of undeveloped land
Designated Local Green Space under policy EN7	338.2	31.8
Designated Public Open Space under policy EN7	29.3	2.8
Undeveloped land within Flood Zone 3b (functional floodplain)	316.4	29.8
Local wildlife sites and priority habitats	87.4	8.2
Registered parks and gardens	27.0	2.5
Undeveloped land within DEPZ for AWE Burghfield	58.7	5.5
School playing fields and land within school grounds	69.9	6.6
Undeveloped land within University of Reading campus	18.4	1.7
Cemeteries and churchyards	19.6	1.8
Allotments	12.7	1.2
Other undeveloped land	85.0	8.0
Total	1,062.5	100.0

³ Not including land within a category previously listed in the table, to avoid double counting

Appendix 2: Gypsy and Traveller Provision Background Document, September 2017

**READING BOROUGH COUNCIL
LOCAL PLAN**

**GYPSY AND TRAVELLER PROVISION
BACKGROUND DOCUMENT**

**Information to support the Local Plan and Gypsy and
Traveller Provision Consultation Document**

September 2017

***NB: This is a 'live' document, and may be updated prior to Submission
of the Local Plan to the Secretary of State. Please check the Council's
website for the latest version.***

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1. INTRODUCTION

- 1.1 This report sets out the work that the Council has undertaken in assessing potential sites to meet the identified need for gypsy and traveller provision in Reading up to 2036. As such, it provides background to the consultation on Gypsy and Traveller Provision (September 2017) as well as to the Reading Borough Local Plan as a whole.
- 1.2 The identified need arises from the Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment (GTAA), which was produced by the Council's consultants, arc⁴, in June 2017. The needs identified were as follows:
- Permanent pitches totalling between 10 (using the Planning Policy for Traveller Sites definition of need) and 17 (using cultural need) pitches
 - A transit site capable of accommodating 5 pitches
 - 2 additional plots for travelling showpeople
 - No additional moorings for those dwelling on houseboats.
- 1.3 No needs have been identified for moorings. The need for accommodation for travelling showpeople is small and arises later in the plan period, and options for extending the existing site at Scours Lane may be possible. For that reason, the work undertaken to look at accommodating needs has focused on the need for permanent and transit provision for gypsies and travellers.

2. NON-COUNCIL-OWNED SITES

- 2.1 There are no existing gypsy or traveller sites in Reading. Nor has there been any substantive interest in provision of such sites. Only one application for gypsy and traveller provision has been received by Reading Borough Council in recent years, which involved provision of two pitches on a small site at Brybur Close. The application was refused, and permission has now been granted for a new house on that site.
- 2.2 As the Council was aware that undertaking a GTAA was likely to lead to the identification of some need for new provision, it has explicitly sought the nomination of potential sites for this purpose.
- 2.3 The Council undertook a Call for Sites in January 2014 for all purposes, and no sites were put forward for gypsy and traveller accommodation at this stage. A second call for sites was carried out in September 2015, and, once again, no sites for gypsy and traveller accommodation were nominated.
- 2.4 In consultation on Issues and Options for the Local Plan in January 2016, in view of the lack of sites nominated so far, the Council asked the following specific question (9).
- “Are there any sites that would be suitable for provision for gypsies and travellers?”*
- 2.5 None of the responses to the Issues and Options consultation identified any specific sites.

- 2.6 A Draft Local Plan was produced in May 2017. The Plan included a draft criteria-based policy for gypsy and traveller sites, but was not able to identify a draft allocation for a site to meet needs. At the time, the GTAA had not yet reported on the level of need. Again, the Council asked for sites to be nominated, and paragraph 4.4.87 stated:

“As the GTAA is now being finalised, the Council has not had an opportunity to identify whether a site can be found within Reading Borough, and if so, where that site should be. If a site cannot be found within Reading, the Council will seek to resolve this issue with neighbouring authorities through the duty to co-operate. This issue will need to be resolved by the time of the Pre-Submission Draft of the Local Plan, later in 2017. The Council therefore remains open to suggestions for a site to meet this need.”

- 2.7 Once again, no site was put forward through the consultation. It is important to also note that, at the same time, the Council was considering all potential development sites as part of the Housing and Economic Land Availability Assessment (HELAA), and no obvious sites for gypsies and travellers were emerging through that process.
- 2.8 As a last check, the Council decided to write to all landowners of proposed development sites in the Draft Local Plan to fully satisfy itself that there was no interest in all or part of a site being used for gypsies and travellers. The sites in the Draft Local Plan were those that had been through the HELAA process and been identified as being suitable for development.
- 2.9 Therefore, on 8th August 2017, the Council wrote to relevant landowners, giving a response deadline of 30th August. The only landowners not contacted were landowners of sites in the town centre proposed for high-density development, where there would clearly be no scope to include pitches as part of any mix. The text of the relevant e-mail/letter is set out at Appendix 1. Once again, no landowners suggested that their site would potentially be available.
- 2.10 In allocating a site for a specific use within the Local Plan, the Council must be confident that there is a likelihood of that use taking place. It is clear from the responses to consultation, as well as from the lack of history of planning applications for this use, that there is very little prospect of a site coming forward for gypsy and traveller use on non-Council-owned land.

3. COUNCIL-OWNED SITES

- 3.1 The main bulk of this report deals with the processes that have been undertaken in looking at the Council's own land, in view of the established lack of interest in providing a site for gypsies and travellers, and the lack of identified potential privately-owned sites.

Size thresholds for assessment

- 3.2 The first stage is to identify the likely size of a site needed. In terms of size, there is unfortunately very little guidance available on the size of a pitch for travellers, either permanent or transit. However, there is some good practice guidance available on what each pitch should contain (see

particularly 'Designing Gypsy and Traveller Sites: Guidance by the Welsh Government¹'), and the Council has therefore used this information to create a basic layout that gives an indication of the minimum size needed.

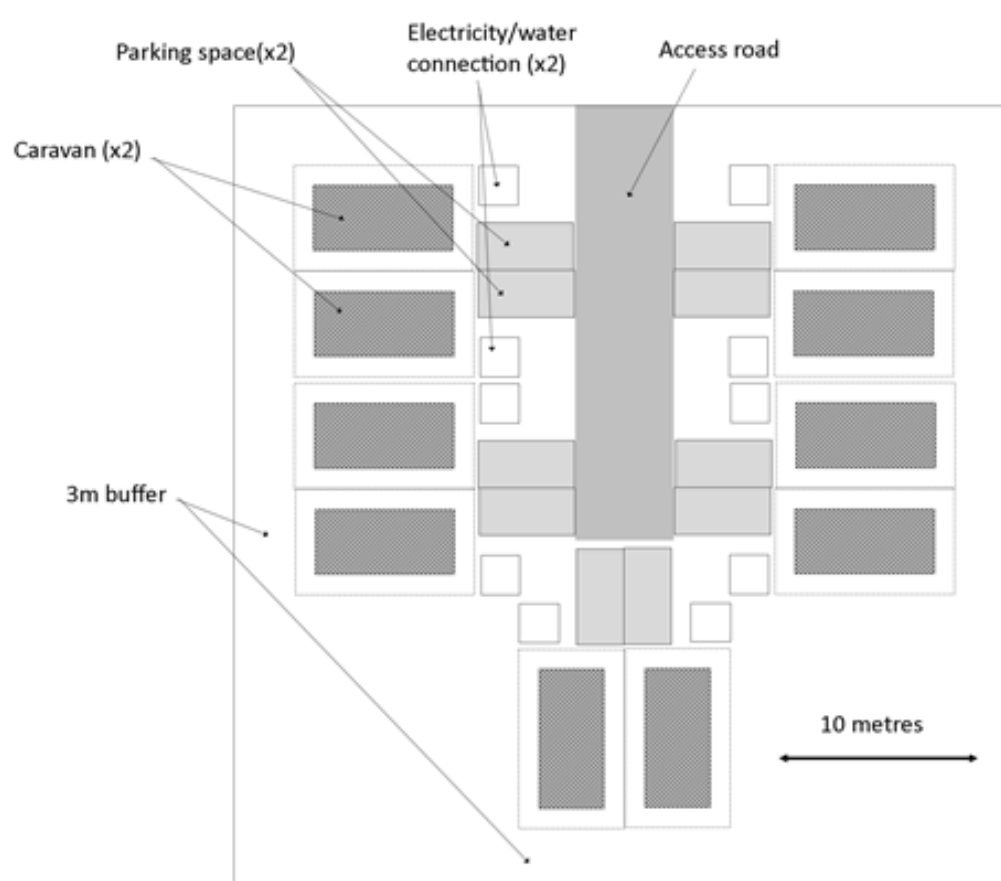
3.3 There will be different size requirements for permanent and transit pitches, and these are discussed below.

3.4 For transit pitches, each individual pitch needs to contain the following:

- Space for two touring caravans
- Two parking spaces
- Water and electricity connections
- A 3m buffer around the boundary

One transit 'pitch' can accommodate two caravans, which means that identifying a site for five pitches will actually accommodate up to ten caravans.

3.5 A basic sketch layout is shown below. At a minimum, a site would need to be around 0.15 ha to accommodate five transit pitches.



3.6 For permanent pitches, each pitch would generally contain the following:

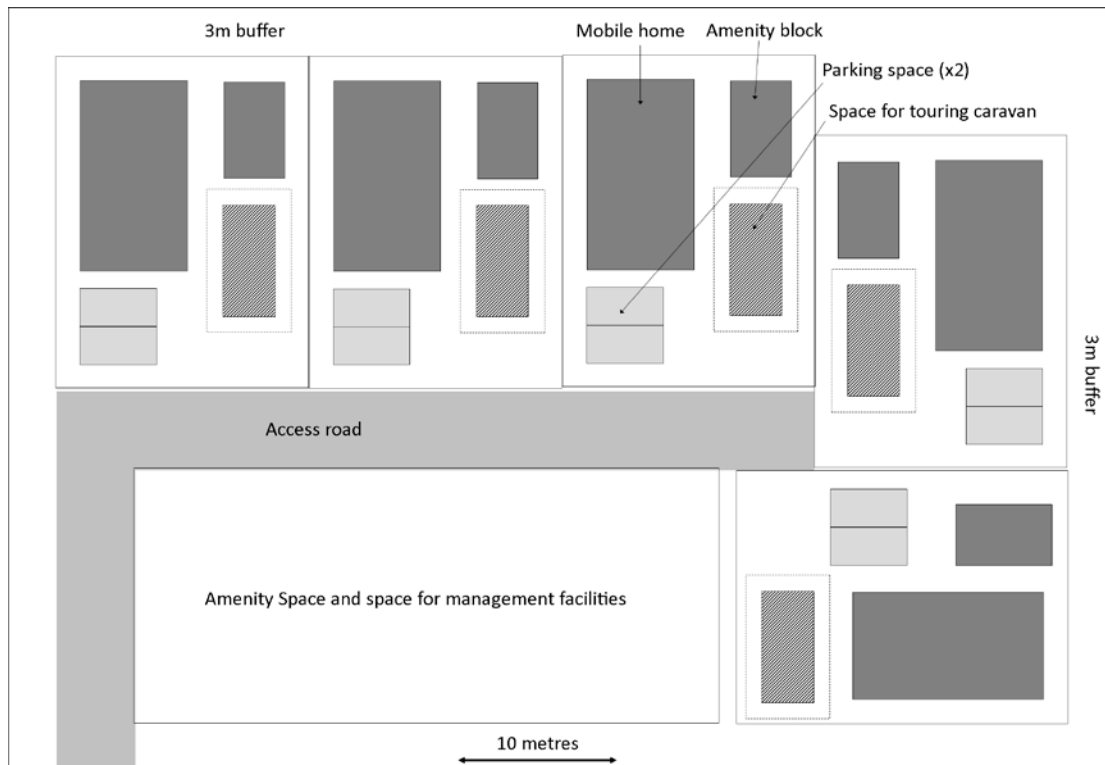
- Space for a mobile home;
- Space for a touring caravan;
- An amenity block (containing WC with sink, bath/shower, store room, kitchen/food preparation area, small dining area);

¹ <http://gov.wales/docs/dsjlg/publications/equality/150528-designing-gypsy-and-traveller-sites-en.pdf>

- Two parking spaces;
- At least six metres between mobile homes; and
- A 3m buffer around the boundary.

There would also need to be space for any on-site management facilities, visitor parking and amenity/play space.

- 3.7 A basic sketch layout is shown below. At a minimum, a site would need to be around 0.34 ha to accommodate five permanent pitches.



- 3.8 Therefore, all potential sites of over 0.15 ha were considered for transit provision, and all sites over 0.34 ha were also considered for permanent provision.

Initial List of Sites

- 3.9 The initial list of Council-owned sites involved identifying all of those sites above the size threshold other than those that:
- a. Are identified as protected open space within the Draft Local Plan (May 2017) or provide statutory allotments;
 - b. Are occupied by an in-use building or buildings.
- 3.10 It is important to emphasise that there was no other assessment carried out at this stage to generate the initial list of 80 sites (as set out in Appendix 2, with maps of all of the sites at Appendix 3). This means that there were some sites within the initial list where there was clearly unlikely to be any potential for use for gypsies and travellers. However, it was important to ensure that the assessment of sites is as thorough as possible, and that the reason for rejection of sites is set out formally.

Assessing the Sites

- 3.11 The Draft Local Plan (May 2017) includes a draft policy on provision for gypsies and travellers, and it was considered that the criteria in this policy form a robust basis for assessing the sites. These criteria are that proposals should:
- i. Meet an identified need for gypsy, traveller or travelling showpeople accommodation within Reading;
 - ii. Have safe and convenient access onto the highway network;
 - iii. Have good access to a range of facilities including education and healthcare by a choice of means of travel, including walking;
 - iv. Not have an unacceptable impact on the physical and visual character and quality of the area;
 - v. Not have an unacceptable impact on the amenity of existing residents in surrounding areas, or on future residents of the proposal; and
 - vi. Not result in the loss of important trees or wildlife.
- 3.12 The Gypsy and Traveller Accommodation Assessment had already established the need for accommodation, so criterion (i) was not applied in this case. However, the remainder were considered within the assessment.
- 3.13 The assessment also considered any other issues that would affect the suitability of the site. This included potential contamination and any issues associated with topography, bearing in mind that sites need to be accessible to caravans. However, arguably the most significant consideration is flood risk, particularly since so much of Reading's undeveloped land is at risk of flooding. National planning policy is clear that any development that would involve people living in caravans and mobile homes is not appropriate in Flood Zone 3 or the functional floodplain, and there is no recourse to the sequential test or exceptions test in these cases.
- 3.14 The availability of the site is also a significant consideration. Many sites are covered by existing leases or covenants, or are in existing uses that are not likely to cease during the plan period. Others are being brought forward to meet other significant identified development needs, such as for housing or industrial.
- 3.15 The following criteria therefore formed the basis of the assessment:
- Highway access
 - Access to facilities
 - Effect on character
 - Effect on amenity
 - Trees and biodiversity
 - Other suitability considerations
 - Availability.
- 3.16 The results of the assessment are set out in Appendix 1. It is important to understand that in some cases, once a clear and unarguable reason for excluding a site had been established, there was often no reason to consider other criteria in depth. This was particularly the case where a site is in Flood Zone 3, or will not be available for gypsy and traveller use. In some cases therefore, the analysis of other criteria is not particularly full.

Results

- 3.17 The results of the assessment were that all but one of the 80 sites were rejected. The remaining site, site 1 at Cow Lane and Richfield Avenue, is included within the Gypsy and Traveller Provision Consultation Document, with a proposal to identify it for transit provision within the Local Plan.

APPENDIX 1: TEXT OF LETTER/E-MAIL TO LANDOWNERS OF DRAFT LOCAL PLAN DEVELOPMENT SITES

Reading Borough Local Plan - potential for traveller provision

We are writing to you as the owner of all or a part of a site identified in the Draft Reading Borough Local Plan (ER1d: Land adjacent to 40 Redlands Road) because we are trying to understand the potential for development sites in Reading to help to meet the identified need for gypsy and traveller provision. Recent work has shown that there is a need for between 10 and 17 permanent pitches for travellers and for 5 transit pitches. As an approximate guide, we estimate that accommodating 5 permanent pitches requires a minimum area of 0.34 ha and 5 transit pitches requires a minimum of 0.15 ha. Given the constraints of Reading, as a mainly urban authority with most of its undeveloped areas constrained by issues such as flood risk, finding land for such sites represents a challenge. We have previously twice asked for sites to be nominated for traveller use, but none have come forward.

We are therefore writing to owners of proposed development allocations in the emerging Local Plan (with the exception of the high density town centre developments) to ask whether there is any potential availability of all or part of their sites for gypsy or traveller use. Please note that this e-mail does not mean that we consider such a use on your site would necessarily be appropriate – no full assessment has been carried out at this stage, and we are simply writing to all landowners to understand what the possibilities are.

If you do consider that there is potential availability of your site for gypsy and traveller provision, please let us know by e-mailing planningpolicy@reading.gov.uk by Wednesday 30th August. If you have any queries, please let me know.

APPENDIX 2: SUMMARY OF ASSESSMENT OF COUNCIL-OWNED SITES

Site no	Ward	Address	Size (ha)	Highway access	Access to facilities	Effect on character	Effect on residential amenity	Trees/ biodiversity	Other suitability	Availability	Conclusions	
1	Abbey	Land at Junction of Cow Lane and Richfield Avenue	1.47	Potentially suitable	Potentially suitable	Potentially suitable	Potentially suitable	Some trees and vegetation on site, but much of site is gravel/ hardstanding	Site in Flood Zone 2 and around 65% of site in FZ3. Part of wider open space but mainly gravelled	Site part of land used for Reading Festival	CONSULT	
2	Abbey	Rivermead overflow parking areas	1.18	Potentially suitable	Potentially suitable	Potentially suitable	Potentially suitable	Potentially suitable	Site in Flood Zone 2. Potential contamination. Landscape issues	Not available, as required for continued car park use.	REJECT	Required for continued use as car park
3	Abbey	Land at Orts Road	0.18	Potentially suitable	Potentially suitable	Removes sole piece of amenity land in housing estate	Adjacent to residential	Significant trees on edge of site	Loss of recreation space	No known restrictions	REJECT	Residential amenity Visual amenity
4	Abbey	County Lock	0.25	No existing access, only potential access in private hands	Potentially suitable	Unacceptably alters character of riverside	Potentially suitable	Waterway has biodiversity importance	Site in Flood Zone 2, small part in Flood Zone 3, loss of public open space	No known restrictions	REJECT	Visual amenity No vehicular access
5	Abbey	Reading Family Centre, North Street	0.22	Potentially suitable	Potentially suitable	Potentially suitable	Adjacent to residential	Potentially suitable		In use for temporary education. Required for alternative use.	REJECT	Required for alternative use
6	Battle	Field at Littlejohn's Farm	2.94	No current vehicular access	Some distance from nearest shops and services	Effect on landscape character	Potentially suitable	Site has biodiversity significance	Site in functional floodplain.	Site part of land used for Reading Festival	REJECT	Flood risk Biodiversity significance Landscape significance
7	Battle	Thames Side Promenade	2.11	No current vehicular access	Some distance from nearest shops and services	Effect on landscape character	Potentially suitable	Site has biodiversity significance	Site in functional floodplain. Loss of recreation space.	Site part of land used for Reading Festival	REJECT	Flood risk Biodiversity significance Landscape significance
8	Caversham	Land at Elliotts Way	0.22	Potentially suitable	Potentially suitable	Loss of open residential amenity land affects character of area	Adjacent to residential	Some trees on site	Site in Flood Zone 2	No particular comments	REJECT	Residential amenity Visual amenity
9	Caversham	Former Caversham Nursery	0.16	Potentially suitable	Potentially suitable	Potentially suitable	Close to residential	Potentially suitable	Site in Flood Zone 3	In temporary education use	REJECT	Flood risk
10	Caversham	Hills Meadow Car Park	1.25	Potentially suitable	Potentially suitable	Affects character of riverside	Potentially suitable	Potentially suitable	Site in Flood Zone 2. Loss of public car park/ site for events. Landscape significance.	In use for parking	REJECT	Required for continued use as car park Visual amenity
11	Caversham	Land west of Deans Farm	0.31	Potentially suitable	Potentially suitable	Effect on landscape character	Adjacent to residential	Potentially suitable	Site in Flood Zone 3	No particular comments	REJECT	Flood risk
12	Caversham	Nire Road	0.5	Potentially suitable	Potentially suitable	Loss of vegetated land in residential street	Adjacent to residential	Site has biodiversity significance	Most of site in Flood Zone 3, remainder not developable alone	No particular comments	REJECT	Flood risk Biodiversity significance

13	Caversham	Land at Charles Evans Way	0.9	No current vehicle access	Potentially suitable	Effect on landscape character	Adjacent to residential	Part of site has biodiversity significance	Within Flood Zone 3	No particular comments	REJECT	Flood risk Biodiversity significance
14	Church	Land at Windermere Road	0.38	Accessed from residential road	Potentially suitable	Removes residential amenity land	Adjacent to residential	A number of significant trees on site	Loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity
15	Church	Land rear of The Lawns	0.14	No current vehicular access	Potentially suitable	Potentially suitable	Adjacent to residential	Some trees on edge of site	Site on margins of being too small	No particular comments	REJECT	No vehicular access
16	Church	Land rear of Monksbarn	0.41	No current vehicular access	Potentially suitable	Effect on landscape character	Adjacent to residential	Site has biodiversity significance	Steep slope will prevent development involving caravans	No particular comments	REJECT	Biodiversity significance Landscape significance Topography
17	Church	Foxhays Road	1.12	Accessed from residential road	Potentially suitable	Removes residential amenity land intrinsic to character of street	Adjacent to residential	Potentially suitable	Loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity
18	Church	Wentworth Avenue	0.29	Accessed from residential road	Potentially suitable	Removes residential amenity land intrinsic to character of street	Adjacent to residential	Some trees on site	Loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity
19	Katesgrove	Canterbury Road	0.24	Accessed from residential road	Potentially suitable	Removes residential amenity land intrinsic to character of street	Adjacent to residential	Some trees on site	Loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity
20	Kentwood	Scours Lane	1.01	Potentially suitable	Potentially suitable	Effect on landscape character, although adjacent to travelling show people site	Potentially suitable	Potentially suitable	Site in Flood Zone 3	No particular comments	REJECT	Flood risk
21	Kentwood	Land north of Scours Lane allotments	3.42	No vehicular access	Some distance from nearest shops and services	Effect on landscape character	Potentially suitable	River and bank has biodiversity significance	Site within functional floodplain	No particular comments	REJECT	Flood risk
22	Kentwood	Land west of Riverside Park	0.4	Potentially suitable	Potentially suitable	Effect on landscape character	Potentially suitable	Site has biodiversity significance	Site mainly within Flood Zone 3	No particular comments	REJECT	Flood risk Biodiversity significance
23	Kentwood	Garages at Rodway Road	0.28	Potentially suitable	Potentially suitable	Potentially suitable	Adjacent to rear of residential	Potentially suitable		Not all Council-owned. Site required for alternative use	REJECT	Required for alternative use
24	Kentwood	Land at Wealden Way	0.47	Accessed from residential road	Potentially suitable	Effect on landscape character	Adjacent to residential	Site has biodiversity significance	Steep slope will prevent development involving caravans. Potential contamination.	No particular comments	REJECT	Biodiversity significance Landscape significance Topography

25	Kentwood	Land between Denby Way and Chelsea Close	0.2	No vehicular access	Potentially suitable	Loss of open residential amenity land affects character of area	Adjacent to residential	Potentially suitable	Public footpaths across site. Potentially contaminated land.	No particular comments	REJECT	Residential amenity Visual amenity Public footpath crosses site
26	Mapledurham	South of Ridge Hall Close	0.44	Access via the Warren would be difficult for caravans	Potentially suitable	Effect on landscape character	Adjacent to residential	Site has biodiversity significance	Steep slope will prevent development involving caravans.	No particular comments	REJECT	Biodiversity significance Landscape significance Topography
27	Minster	East of A33	3.26	No current vehicular access	Potentially suitable	Effect on landscape character	Potentially suitable	Site has biodiversity significance	Site within functional floodplain	No particular comments	REJECT	Flood risk Biodiversity significance Landscape significance
28	Minster	West of A33	6.45	Potentially suitable	Potentially suitable	Effect on landscape character	Potentially suitable	Site has biodiversity significance	Site within functional floodplain	No particular comments	REJECT	Flood risk Biodiversity significance Landscape significance
29	Minster	Land adjacent to water treatment works	4.59	Potentially suitable	Potentially suitable	Effect on landscape character	Potentially suitable	Site has biodiversity significance	Site within functional floodplain	No particular comments	REJECT	Flood risk Biodiversity significance Landscape significance
30	Minster	Rear of 284-290 Wensley Road	0.19	No vehicular access, although potential to create	Potentially suitable	Potentially suitable	Adjacent to residential	Site currently heavily vegetated. Would need further assessment	Steep slope will prevent development involving caravans	No particular comments	REJECT	Residential amenity Topography
31	Minster	South of Coley Park Allotments	0.99	No current vehicular access, and would be very difficult to create to whole site	Potentially suitable	Potentially suitable	Adjacent to residential at one end	Trees and vegetation along Holy Brook	Partly within Flood Zone 3. Shape of site in FZ3 very difficult to develop	No particular comments	REJECT	Flood risk No vehicle access
32	Minster	Land rear of Arbour Close	0.18	No vehicular access	Potentially suitable	Potentially suitable	Adjacent to residential, site too narrow for adequate buffer	Some significant trees on site	Mainly within Flood Zone 3	No particular comments	REJECT	Flood risk No vehicle access Residential amenity
33	Minster	Land at Coley Place	0.18	No vehicular access	Potentially suitable	Potentially suitable	Adjacent to residential	Some significant trees on site	Steep slope will prevent development involving caravans.	No particular comments	REJECT	Topography
34	Minster	Land west of Swallows Croft	0.49	No vehicular access	Potentially suitable	Woodland significant to character of local area	Adjacent to residential	Site has biodiversity significance, significant woodland		No particular comments	REJECT	Biodiversity significance
35	Norcot	Land at Tarlon Court	0.22	Potentially suitable	Potentially suitable	Removes residential amenity land intrinsic to character of street, adjacent to conservation area	Adjacent to residential	Some trees on site	Highway visibility issues, footpaths cross site, loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity Heritage considerations
36	Norcot	Land at The Meadway	0.19	Potentially suitable	Potentially suitable	Completely changes character of whole area and visibility of shops	Adjacent to residential	Significant tree coverage	Number of footpaths cross site. Loss of recreation space	No particular comments	REJECT	Visual amenity

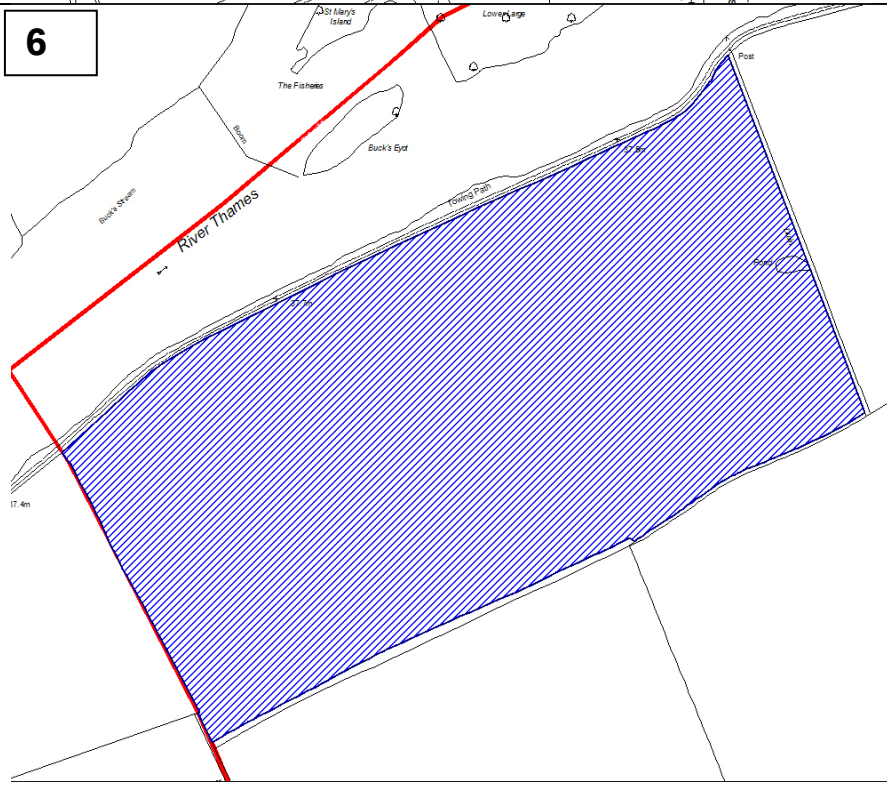
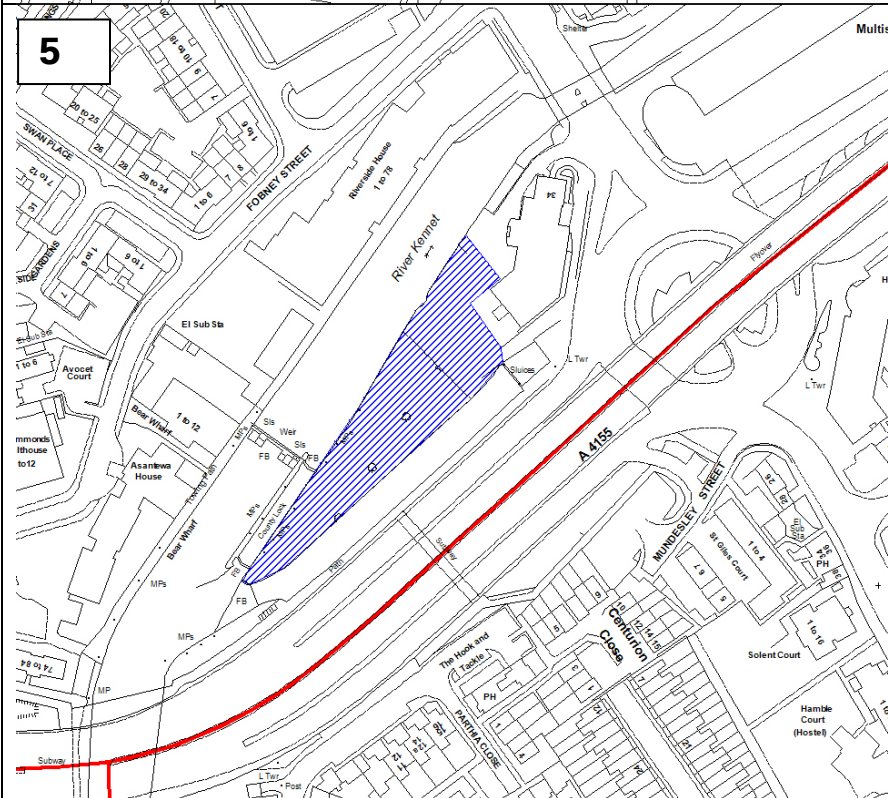
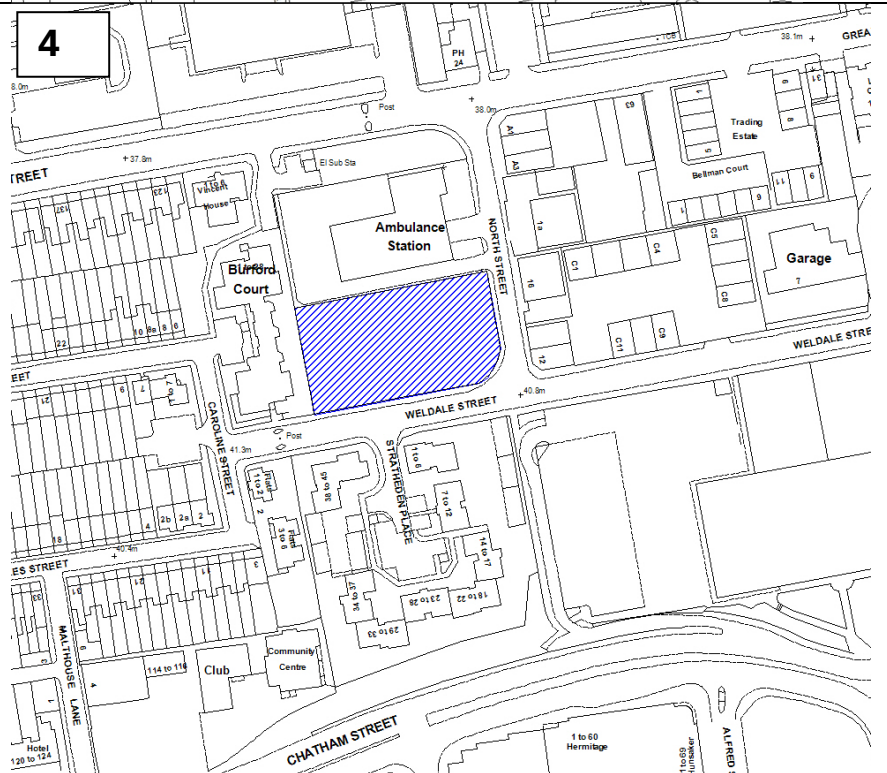
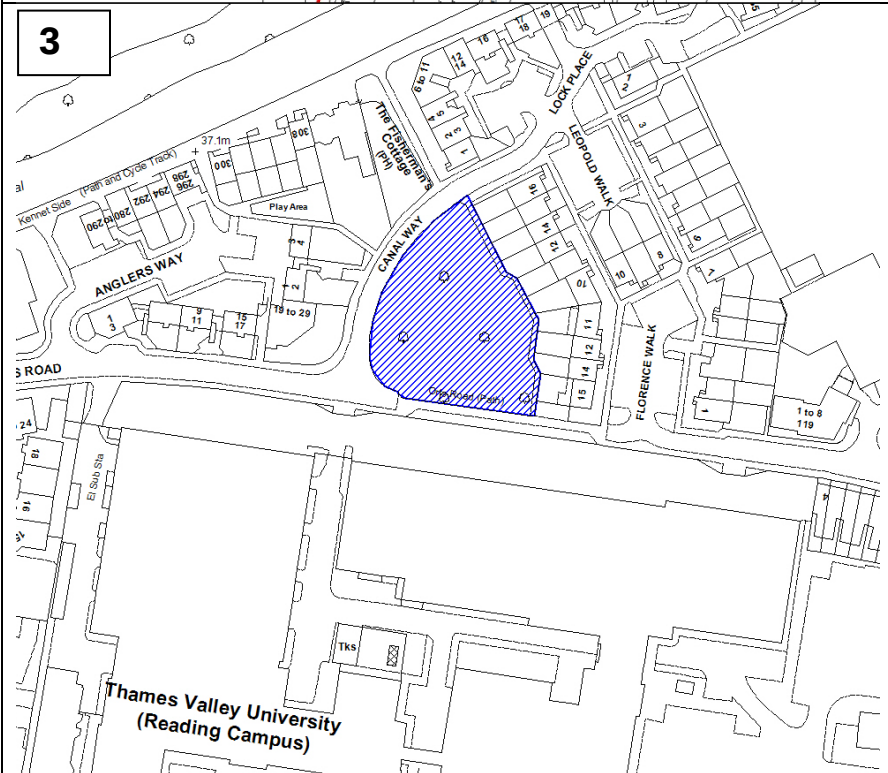
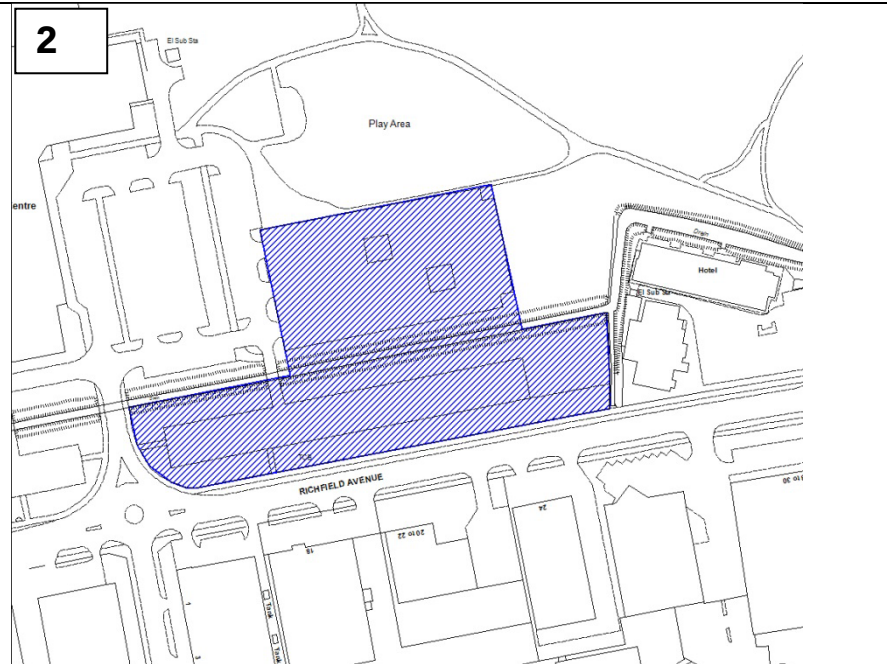
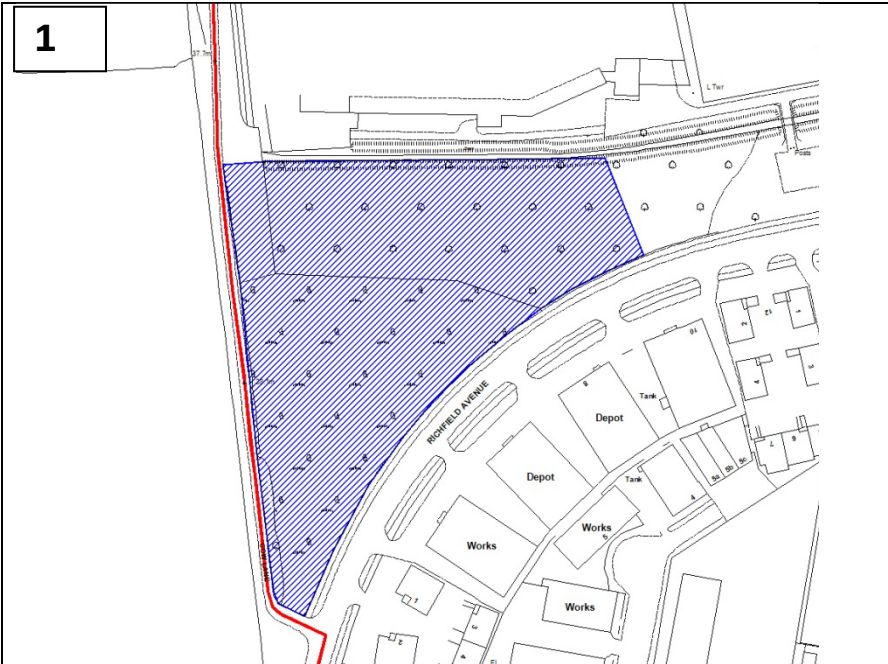
37	Park	Former Tennis Courts, Bulmershe Road	0.51	Access via Bulmershe Road not suitable for caravans	Potentially suitable	Potentially suitable	Close to residential	Potentially suitable		Site required for uses associated with schools	REJECT	Site required for alternative use
38	Park	Land at Green Road	0.49	Potentially suitable	Potentially suitable	Potentially suitable	Close to residential	Potentially suitable		Site required for sports and recreation use	REJECT	Site required for alternative use
39	Park	Mockbeggar Allotments	0.37	Potentially suitable	Potentially suitable	Loss of green area would affect character of area	Adjacent to residential	Some trees on edge of site		In use as allotments, temporary use associated with reservoir works	REJECT	Site required for alternative use
40	Peppard	Land west of Harveys Nurseries and north of Cemetery	0.38	Potentially suitable	Potentially suitable	Effect on landscape character	Potentially suitable	Some trees and vegetation on site		Part of crematorium site and already in use	REJECT	Site required for alternative use Landscape significance
41	Peppard	Grove Road Green	0.23	Potentially suitable	Potentially suitable	Completely changes character of whole area and visibility of shops	Adjacent to residential	Some significant trees on site	Number of footpaths cross site. Loss of recreation space	No particular comments	REJECT	Visual amenity Public footpath crosses site
42	Peppard	Land between Lowfield Road and Milestone Way	0.28	Potentially suitable	Potentially suitable	Loss of open residential amenity land affects character of area	Adjacent to residential	Some trees on site	Loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity
43	Peppard	Car park at the Milestone Centre	0.21	Potentially suitable	Potentially suitable	Site would be highly visible from surrounding area	Adjacent to residential	Potentially suitable		Car park required for community uses and residential	REJECT	Required for continued use as car park
44	Peppard	Land at Lowfield Road	0.73	Potentially suitable	Potentially suitable	Potentially suitable	Adjacent to residential but established mobile homes site and potential to create buffer	Some trees on eastern fringe, could be landscaped buffer		Site to be used for temporary housing, work already underway.	REJECT	Site required for housing use, currently underway
45	Redlands	Land at Hexham Road	0.2	Accessed from residential road	Potentially suitable	Loss of open residential amenity land affects character of area	Adjacent to residential	Site has biodiversity significance		No particular comments	REJECT	Biodiversity significance Residential amenity
46	Southcote	Granville Road verges	2.61	Potentially suitable	Potentially suitable	Site would change character of area as viewed from street and setting of Prospect Park	Adjacent to residential	Large number of significant trees, particularly on Bath Road frontage	Large number of footpaths cross site, access to Bath Rd underpass. Loss of recreation space	Land includes adopted highway	REJECT	Visual amenity
47	Southcote	Devil's Dip, Circuit Lane	0.51	Potentially suitable	Potentially suitable	Woodland intrinsic to character of area	Adjacent to residential	Site has biodiversity significance	Potentially contaminated land	No particular comments	REJECT	Biodiversity significance Visual amenity
48	Southcote	Land at Fawley Road	0.18	Potentially suitable	Potentially suitable	Loss of open residential amenity land affects character of area	Adjacent to residential	Much of site is heavily vegetated	Footpath through site links Fawley Rd to Bath Rd. Loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity Public footpath crosses site

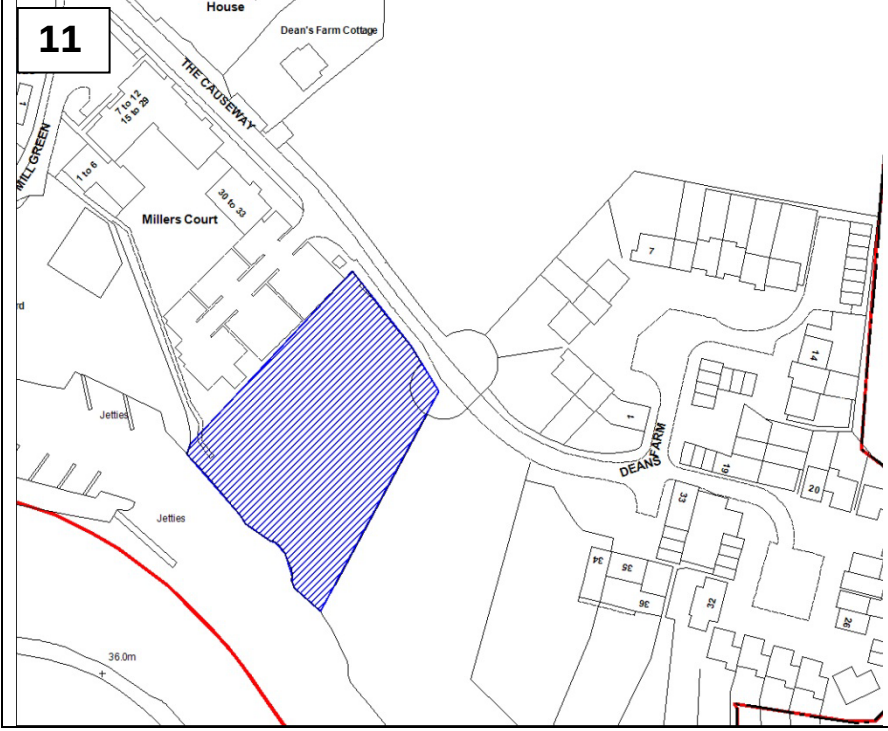
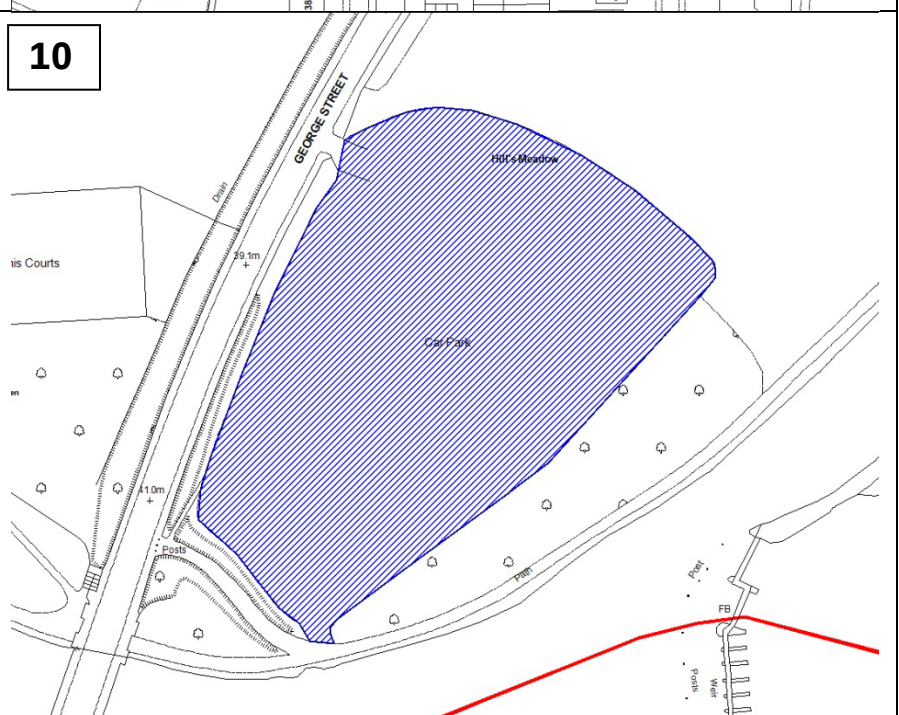
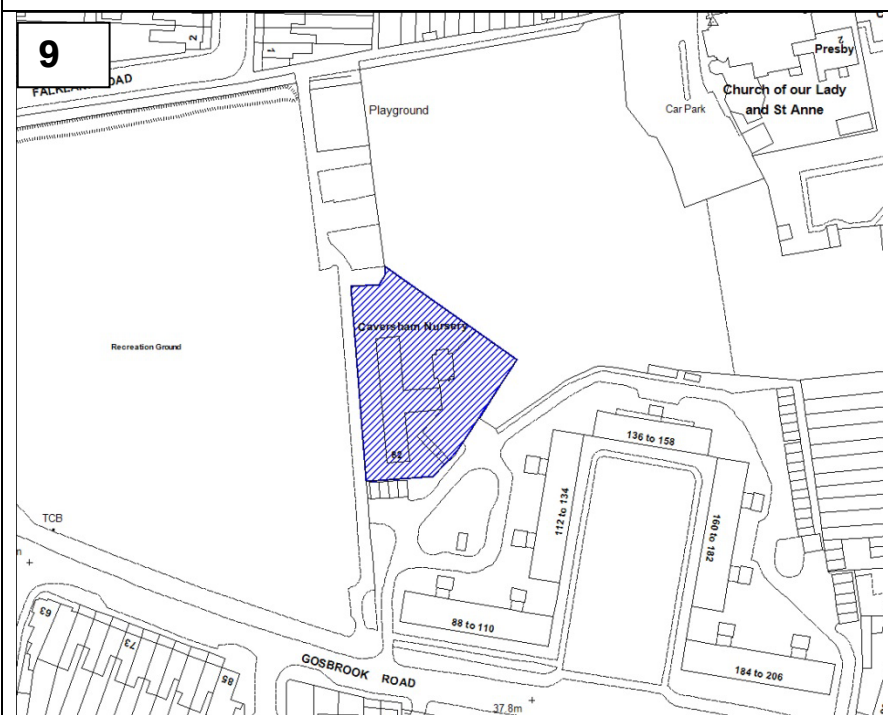
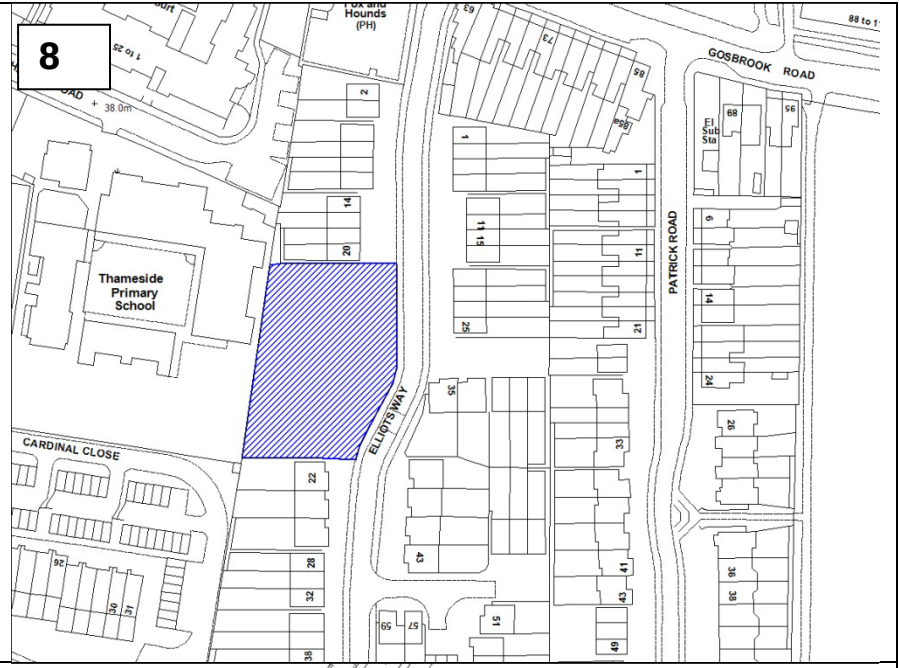
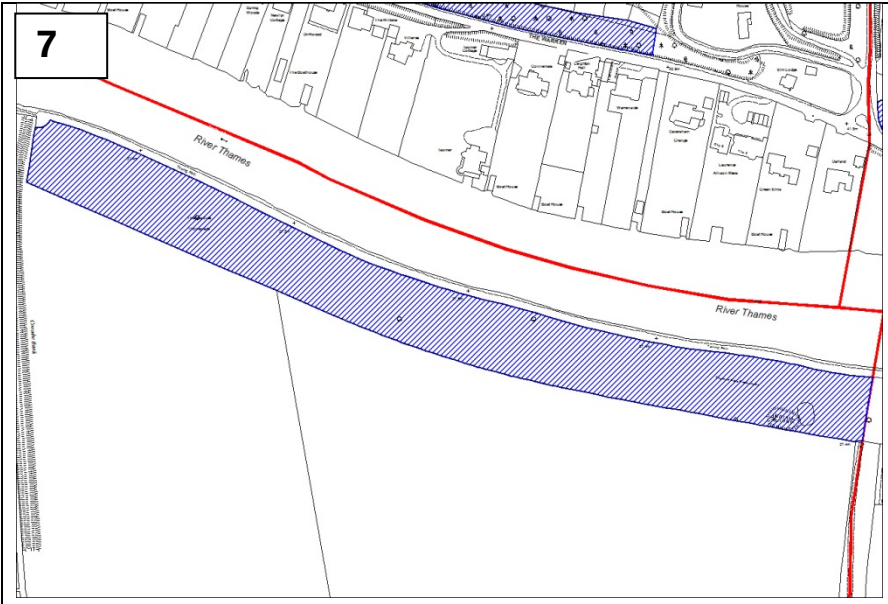
49	Southcote	Alice Burrows Home, Dwyer Road	0.48	Potentially suitable	Potentially suitable	Potentially suitable	Adjacent to residential	TPOs on fringes of site, do not affect overall potential		Required for residential / residential care	REJECT	Site required for alternative use
50	Southcote	Land at Holybrook Crescent	0.26	Potentially suitable	Potentially suitable	Removes residential amenity land intrinsic to character of street	Adjacent to residential	Significant number of trees on site	Potential highways visibility issues. Loss of recreation space.	No particular comments	REJECT	Residential amenity Visual amenity
51	Southcote	Playing Field, Hastings Close	1.46	Potentially suitable	Potentially suitable	Potentially suitable	Adjacent to residential	Significant trees around edge of site		Continued use for playing field required	REJECT	Site required for continued playing field use
52	Southcote	Land east of Brunel Road allotments	2.31	No vehicular access likely to be possible	Potentially suitable	Effect on landscape character	Potentially suitable	Some trees and vegetation on site	Site within functional floodplain	No particular comments	REJECT	Flood risk
53	Southcote	Land south of Hatford Road	2.42	Potentially suitable	Potentially suitable	Effect on landscape character	Adjacent to residential	Site has biodiversity significance	Site within functional floodplain	No particular comments	REJECT	Flood risk Biodiversity significance
54	Southcote	Land west of Florian Gardens	0.22	No vehicular access and no clear means to create access without wider development	Potentially suitable	Potentially suitable	Adjacent to residential	Some trees and vegetation		No particular comments	REJECT	No vehicular access Residential amenity
55	Southcote	Land east of Florian Gardens	0.16	No vehicular access and no clear means to create access without wider development	Potentially suitable	Potentially suitable	Adjacent to residential	Some trees and vegetation		Leased as community allotments	REJECT	No vehicular access Residential amenity
56	Southcote	Coronation Square	0.58	Potentially suitable	Potentially suitable	Would fundamentally alter current character of area	Adjacent to residential	Some trees at northern end	Loss of open space including playing field	No particular comments	REJECT	Visual amenity
57	Southcote	Land at Barn Close	0.34	Access via route to rear of shops, not ideal for caravans	Potentially suitable	Loss of open residential amenity land affects character of area	Adjacent to residential	Potentially suitable	Loss of play area and recreation space	No particular comments	REJECT	Residential amenity
58	Thames	Land at The Warren	1.16	Access via the Warren would be difficult for caravans	Potentially suitable	Effect on landscape character	Adjacent to residential	Site has biodiversity significance	Steep slope will prevent development involving caravans. Potentially contaminated land.	No particular comments	REJECT	Biodiversity significance Landscape significance Topography
59	Thames	Land south of Ammanford	0.34	Potentially suitable	Potentially suitable	Loss of open residential amenity land affects character of area. Effect on landscape character.	Adjacent to residential	Covered by area TPO and has biodiversity significance		No particular comments	REJECT	Protected trees Residential amenity Visual amenity
60	Thames	Land at Gravel Hill	0.17	Gravel Hill is narrow making caravan access difficult	Potentially suitable	Effect on landscape character	Adjacent to residential	TPO at edge of site.		No particular comments	REJECT	Landscape significance Residential amenity

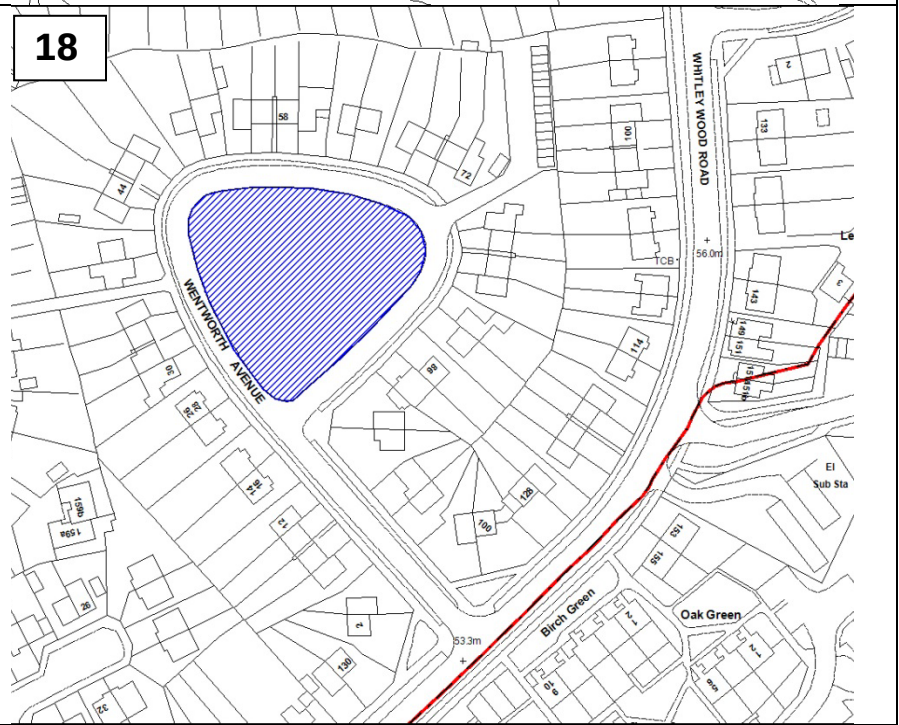
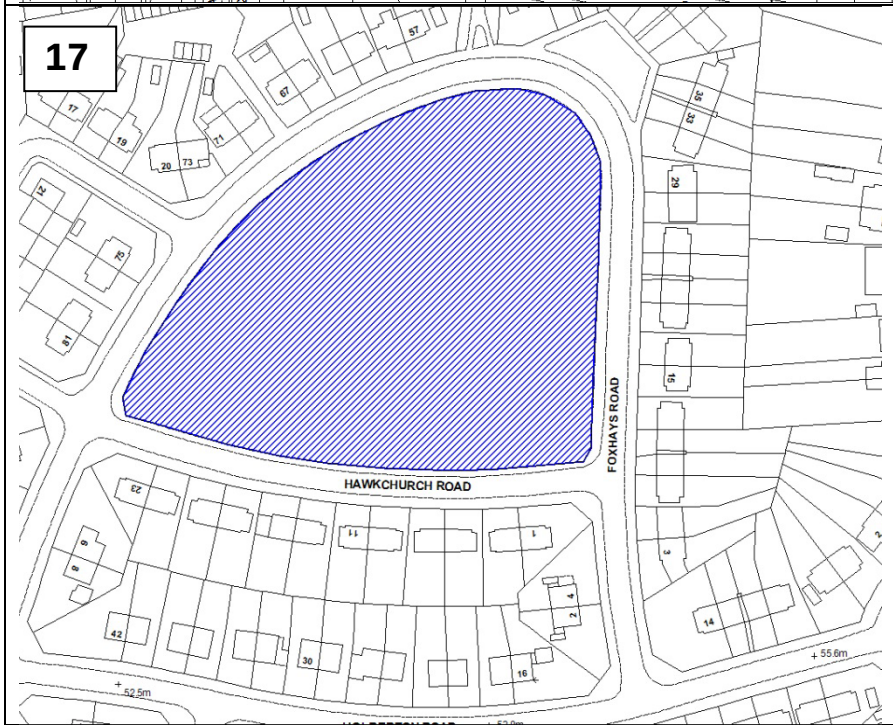
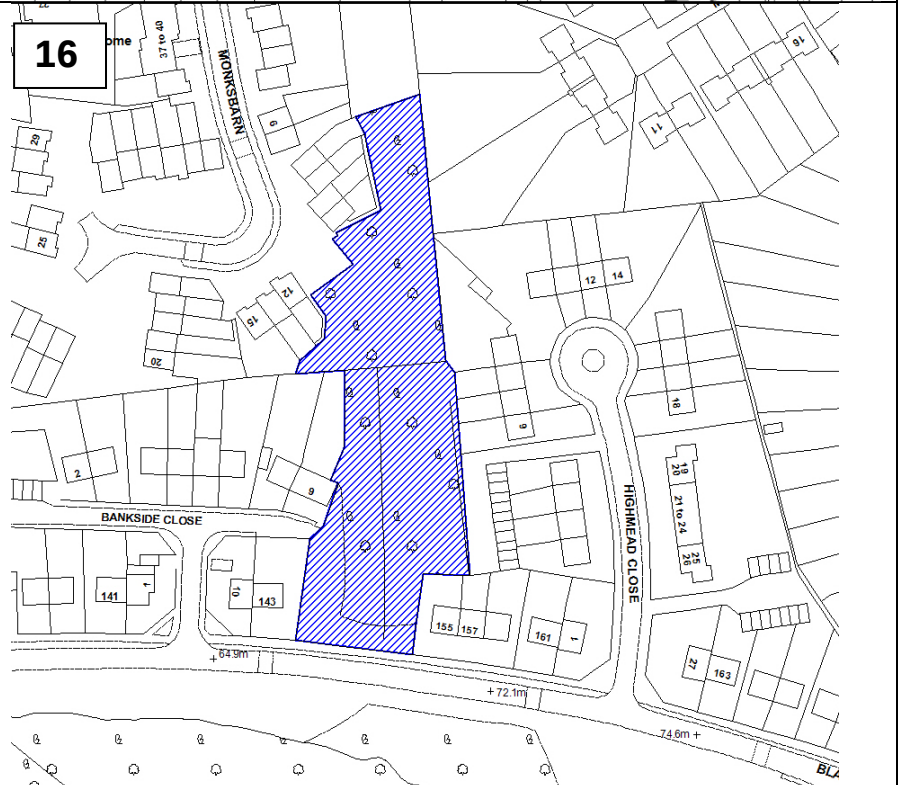
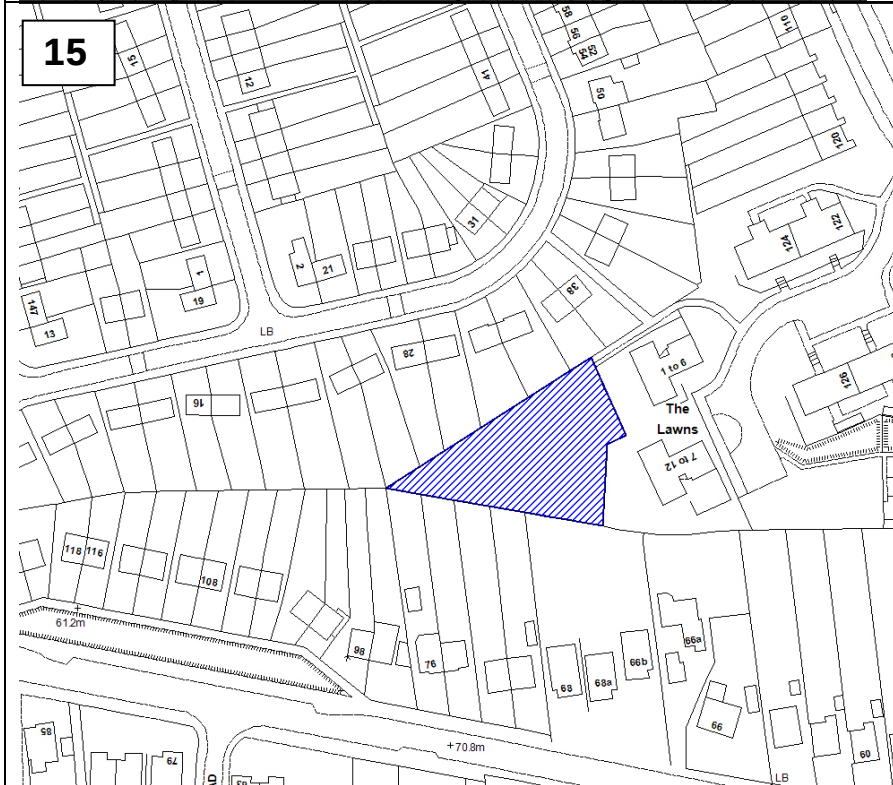
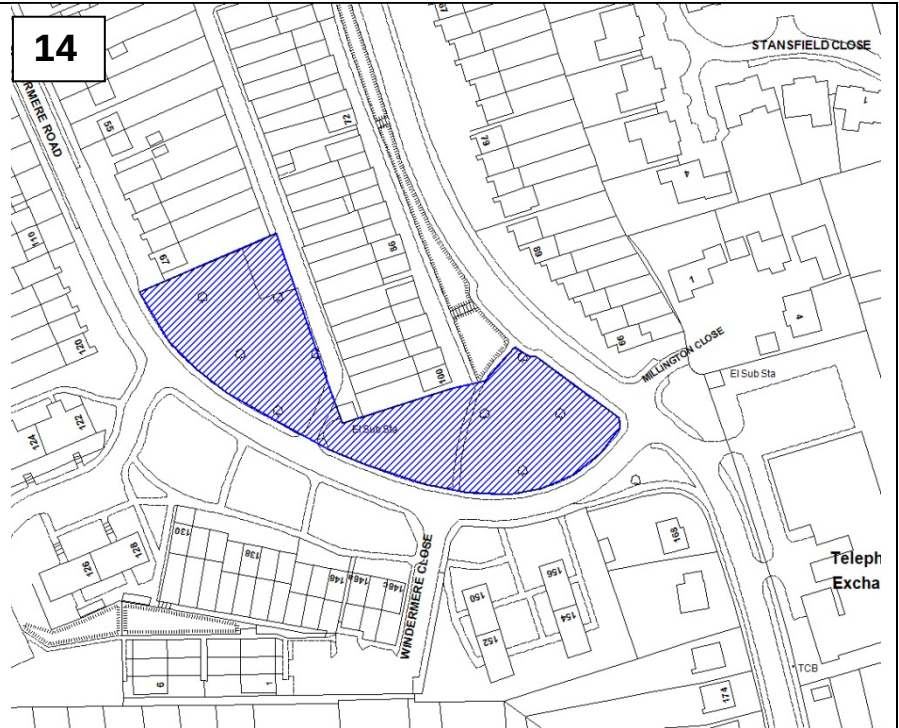
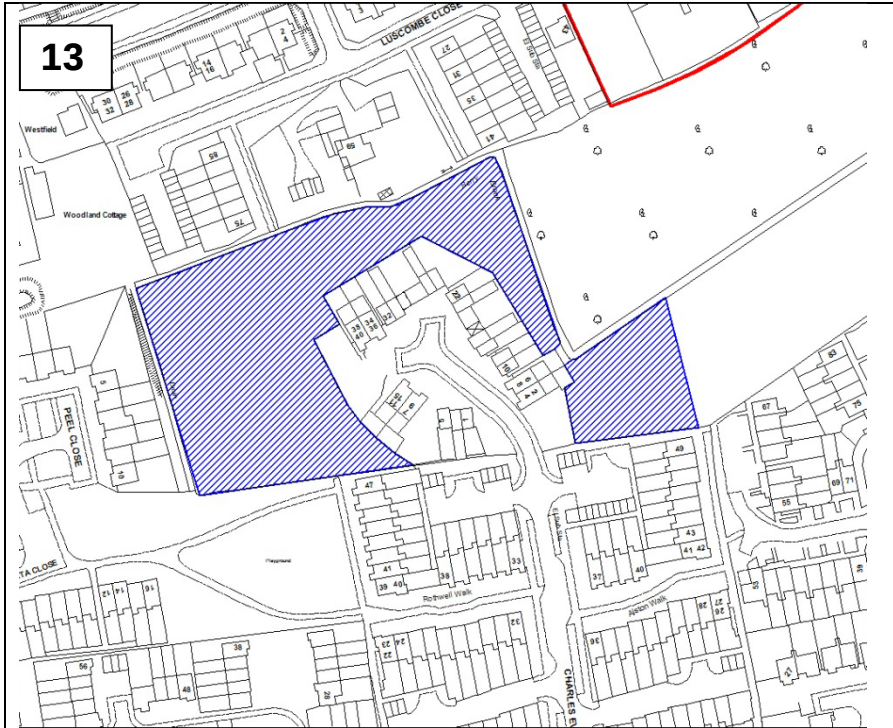
61	Thames	Furzeplat	1.46	No vehicular access	Potentially suitable	Effect on landscape character	Adjacent to residential	Covered by area TPO and has biodiversity significance	Steep slope will prevent development involving caravans.	No particular comments	REJECT	Biodiversity significance Protected trees Topography
62	Tilehurst	Junction of Walnut Way and St Michaels Road	0.21	Difficult site to create new access, would need further investigation	Potentially suitable	Removes residential amenity land intrinsic to character of street	Adjacent to residential	Some significant trees on site	Would affect highways visibility at junction. Loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity
63	Tilehurst	Downing Road Playing Field	1.17	Downing Rd is narrow with on street parking and caravan access would be difficult	Potentially suitable	Would significantly affect character of area	Adjacent to residential, vehicle trips on narrow road	Some trees around edge of site	Loss of playing field	Availability related to Park Lane School proposals as set out in Local Plan	REJECT	Site required for alternative use
64	Tilehurst	Land at Lansdowne Road	0.19	Potentially suitable	Potentially suitable	Removes residential amenity land intrinsic to character of street	Adjacent to residential	Some significant trees on site	Loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity
65	Tilehurst	Land at Portland Gardens	0.39	Potentially suitable	Potentially suitable	Removes residential amenity land intrinsic to character of street	Adjacent to residential	Site has biodiversity significance	Loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity Biodiversity significance
66	Whitley	Wincanton Road	0.6	Potentially suitable	Potentially suitable	Removes residential land intrinsic to character of street	Adjacent to residential	Potentially suitable	Loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity
67	Whitley	Swallowfield Drive	0.35	Potentially suitable	Potentially suitable	Loss of open residential amenity land affects character of area	Adjacent to residential	Potentially suitable	Loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity
68	Whitley	Land at Whitley Wood Lane	0.24	Potentially suitable	Some distance from nearest shops and services	Removes vegetated area which would affect character of street	Adjacent to residential	Overgrown, so potential significance. Would require further investigation.	Not publicly accessible	Not in current use and no public access	REJECT	Residential amenity
69	Whitley	Land at Vernon Crescent	0.5	Potentially suitable	Potentially suitable	Loss of open residential amenity land affects character of area	Adjacent to residential	Number of significant trees across site	Loss of recreation space	No particular comments	REJECT	Residential amenity Visual amenity
70	Whitley	Land at junction of Acre Road and Basingstoke Road	0.16	Potentially suitable	Potentially suitable	Removal of vegetation affects character of junction	Potentially suitable	Large number of significant trees		Includes part of Acre Business Pk site, which is not available. Remainder too small.	REJECT	Part of site in use, remainder too small Visual amenity
71	Whitley	Basingstoke Road verge between Acre and Bennet Road	0.46	Potentially suitable	Potentially suitable	Loss of open residential amenity land affects character of area	Potentially suitable	Number of significant trees across site, particularly south end		No particular comments	REJECT	Visual amenity
72	Whitley	Basingstoke Road verge between Bennet Road and Manor Farm Road	0.99	Potentially suitable	Potentially suitable	Loss of open residential amenity land affects character of area	Potentially suitable	Number of significant trees across site	Number of footpaths cross site	No particular comments	REJECT	Visual amenity

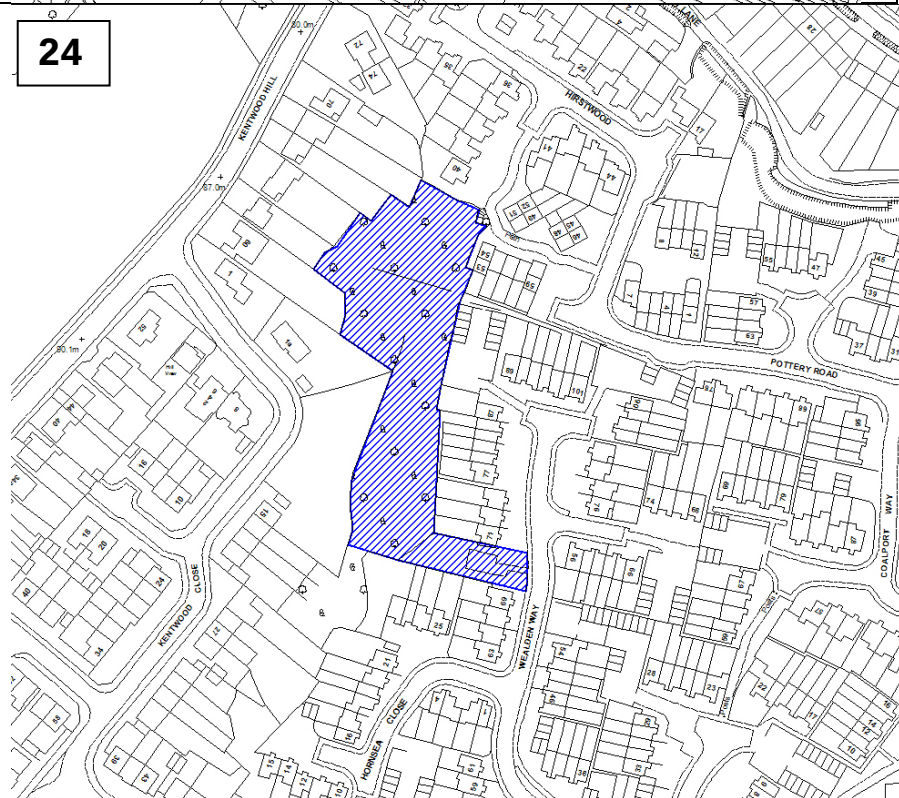
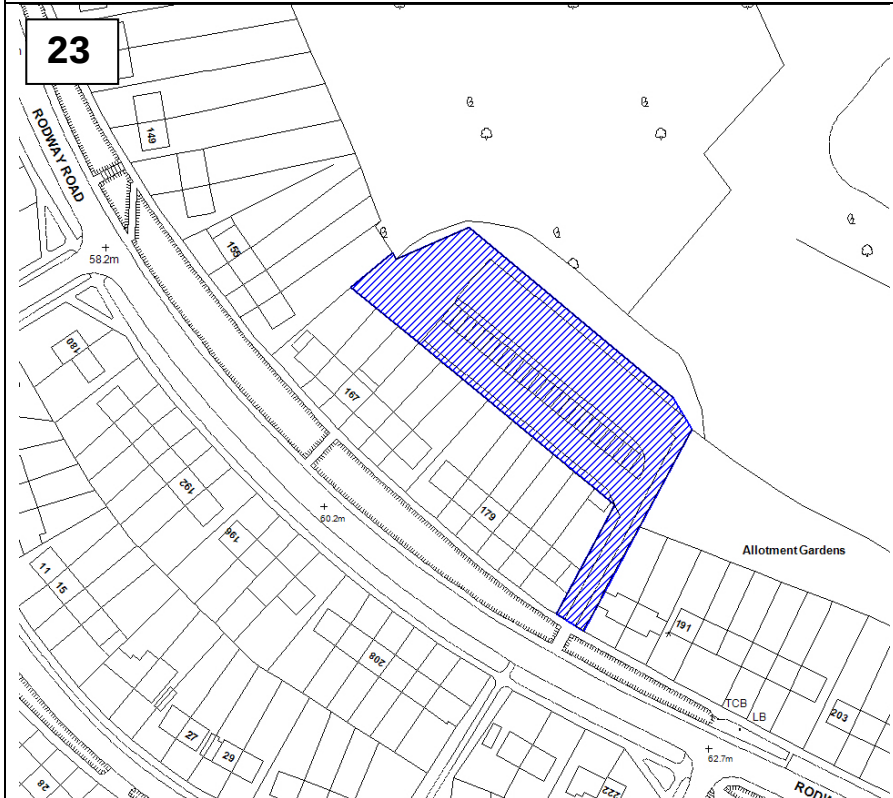
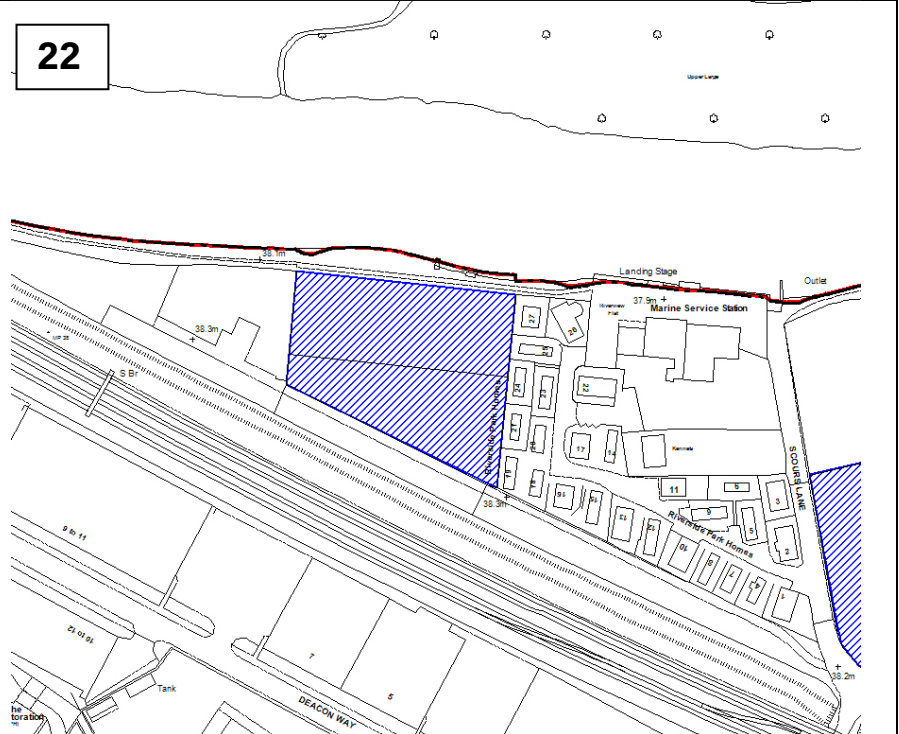
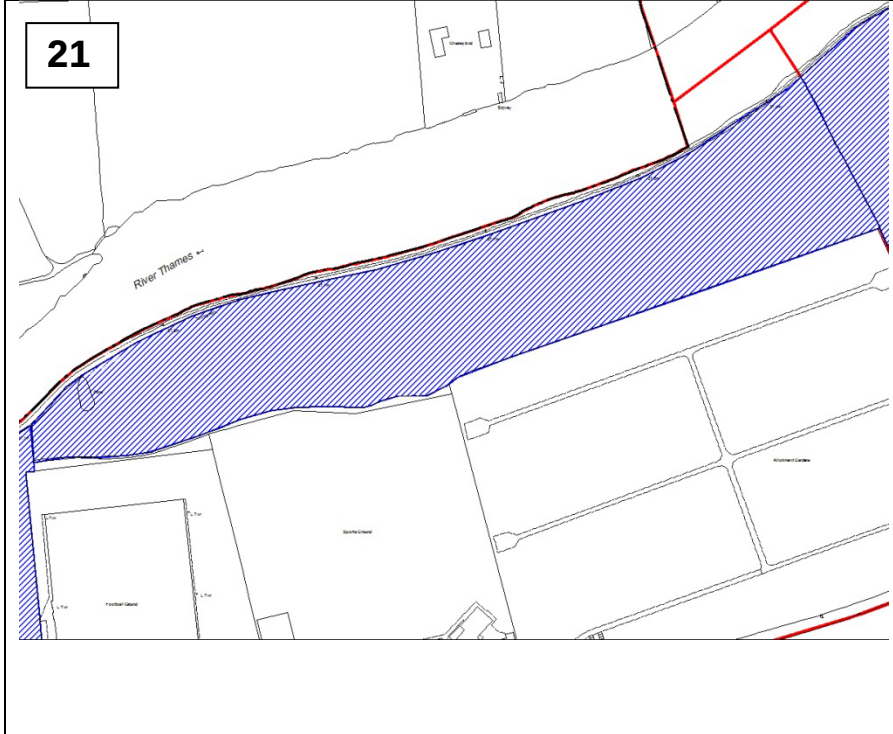
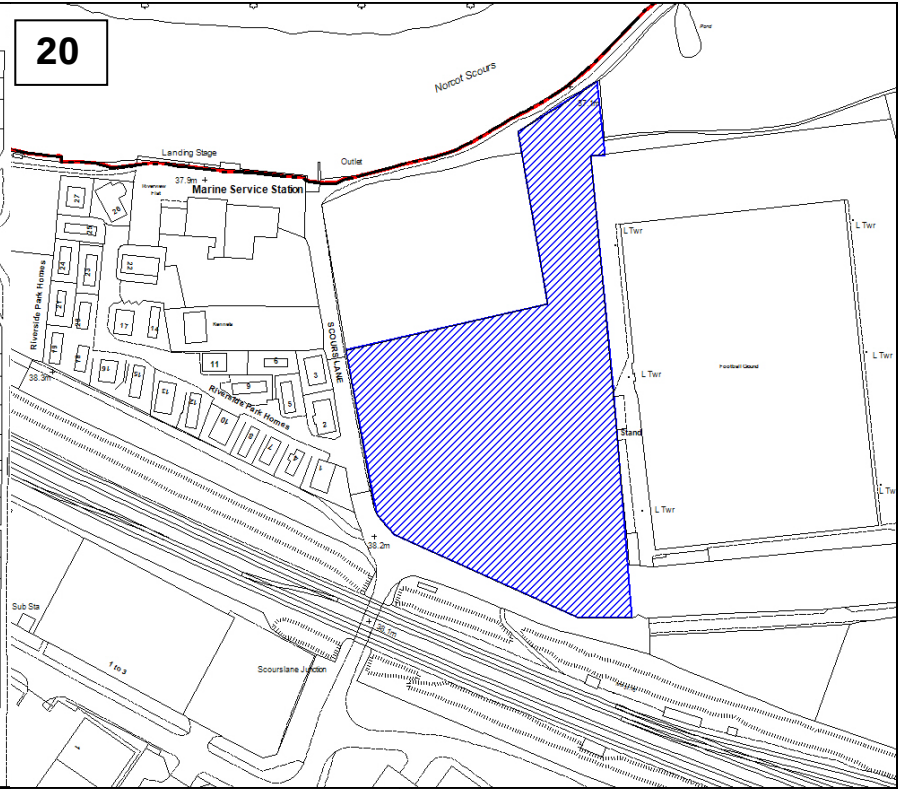
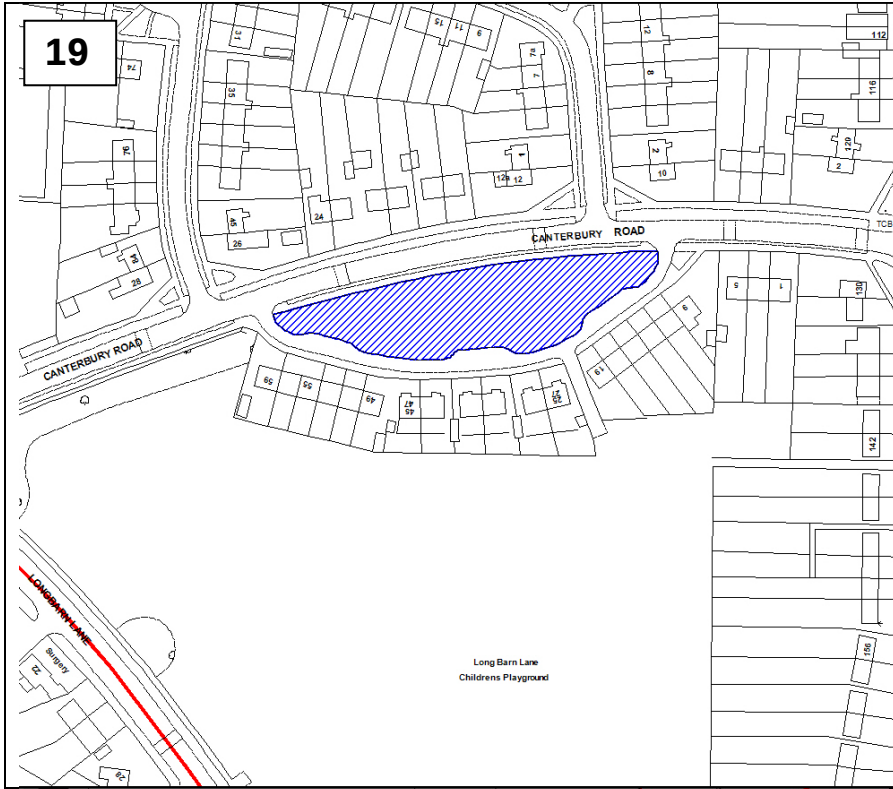
73	Whitley	Southside (former Greyhound/Speedway stadium)	9.7	Potentially suitable	Potentially suitable	Would depend on location and development of wider site	Potentially suitable	Potentially suitable	Most of site in Flood Zone 2. Parts of site subject to potential contamination	Existing ownership arrangements with another party. Planning permission for offices	REJECT	Site required for alternative use
74	Whitley	Land east of Smallmead and south of Island Road	0.25	Potentially suitable	Some distance from nearest shops and services	Island Rd now mainly industrial in character	Effect on potential residents of traveller site through RE3/sewage works	Overgrown site, potential biodiversity significance	In Flood Zones 2 & 3, removing FZ3 land would leave a difficult site to develop	No particular comments	REJECT	Flood risk
75	Whitley	Land north of Island Road	3.18	Potentially suitable	Some distance from nearest shops and services	Island Rd now mainly industrial in character. Northern edge has landscape character.	Potentially suitable	Northern edge has biodiversity significance.	Northern and western edges in Flood Zone 3	Permission now granted for industrial development	REJECT	Site required for alternative use
76	Whitley	Land south of Manor Farm Cottages	1.16	Potentially suitable	Some distance from nearest shops and services	Effect on landscape character	Potentially suitable	Potentially suitable	Site within functional floodplain	No particular comments	REJECT	Flood risk
77	Whitley	South of Kennet and Avon Canal	4.3	Potentially suitable	Some distance from nearest shops and services	Effect on landscape character	Potentially suitable	Potentially suitable	Site within functional floodplain	No particular comments	REJECT	Flood risk Landscape significance
78	Whitley	South of Fobney Pumping Station	0.6	Potentially suitable	Some distance from nearest shops and services	Effect on landscape character	Potentially suitable	Potentially suitable	Site within functional floodplain	No particular comments	REJECT	Flood risk Landscape significance
79	Whitley	South of Smallmead	3.79	No existing access, any access would need to be gained via development of adjacent former landfill site	Some distance from nearest shops and services	Potentially suitable	Effect on potential residents of traveller site through RE3/sewage works	Potentially suitable	Flood Zone 2. Location on former landfill means contamination and instability a major obstacle	Potential RE3 or TWA extension. Allocation for industrial in Draft Local Plan	REJECT	No vehicular access Likely contaminated land
80	Whitley	South of Sewage Treatment Works	1.61	No existing vehicular access	Some distance from nearest shops and services	Potentially suitable	Effect on potential residents of traveller site through sewage works	Potentially suitable	Flood Zone 2. Land subject to potential contamination	Part of wider STW site	REJECT	Site required for alternative use

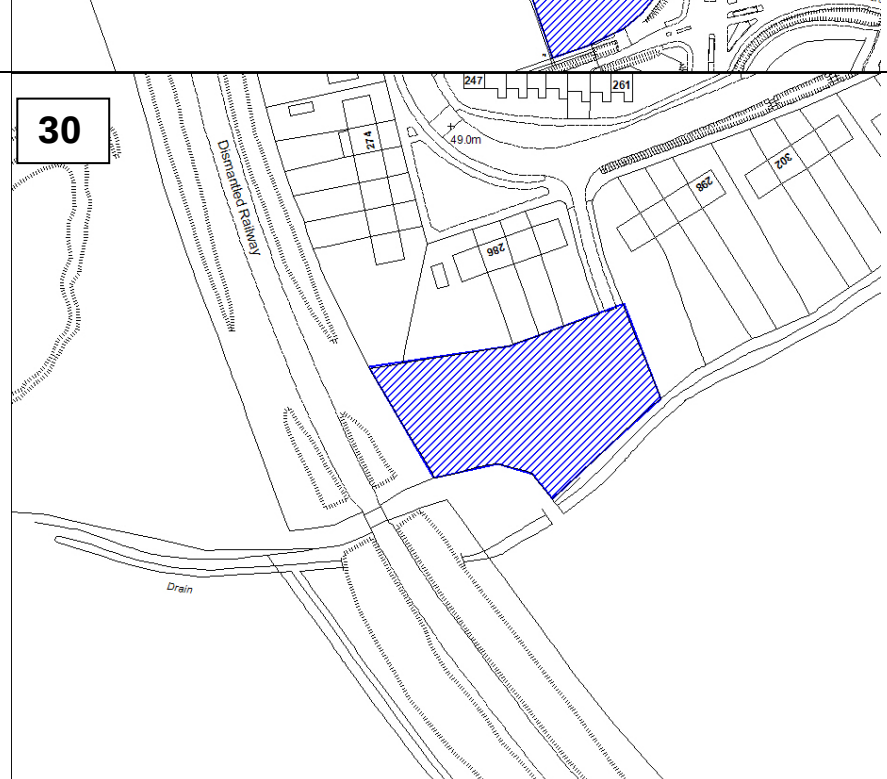
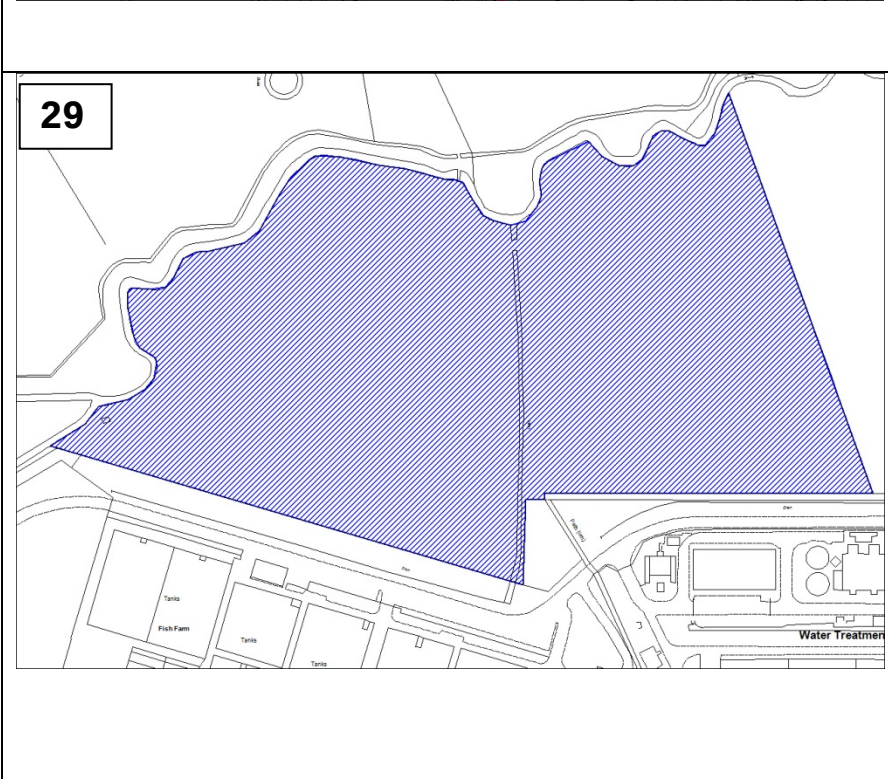
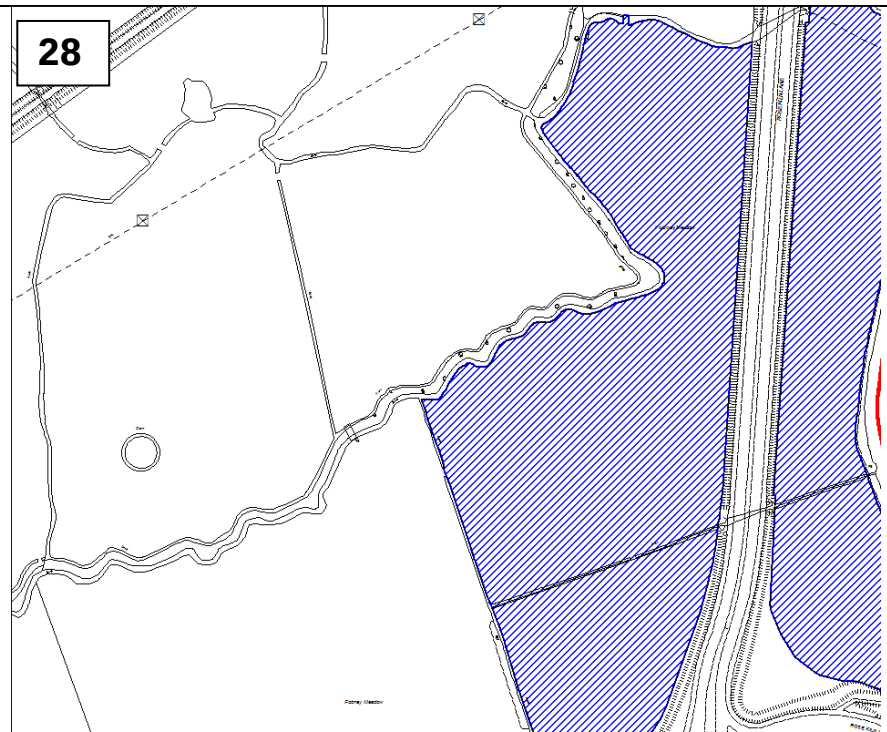
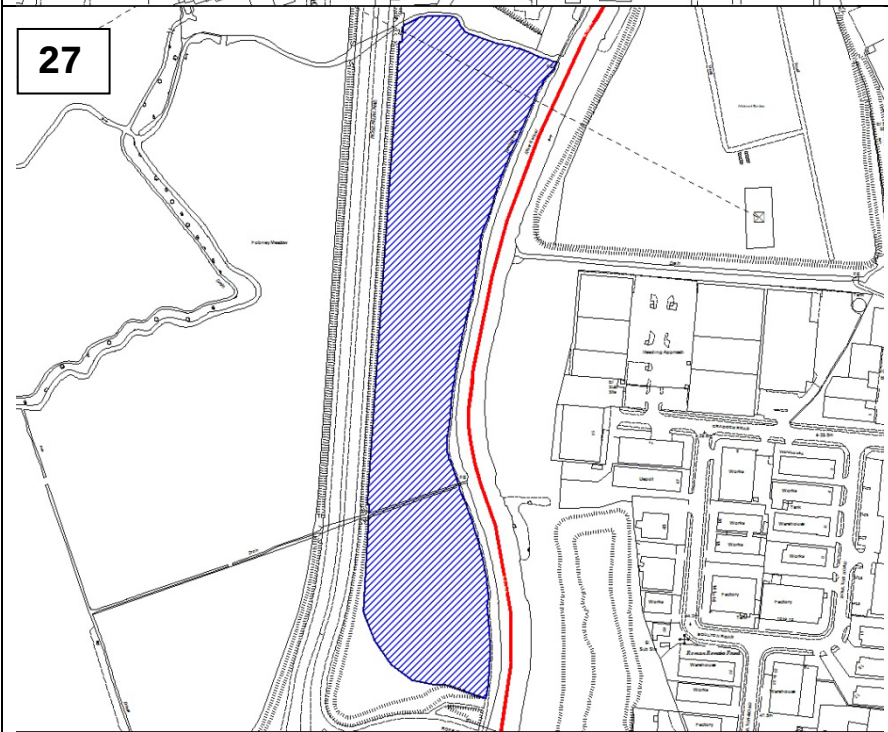
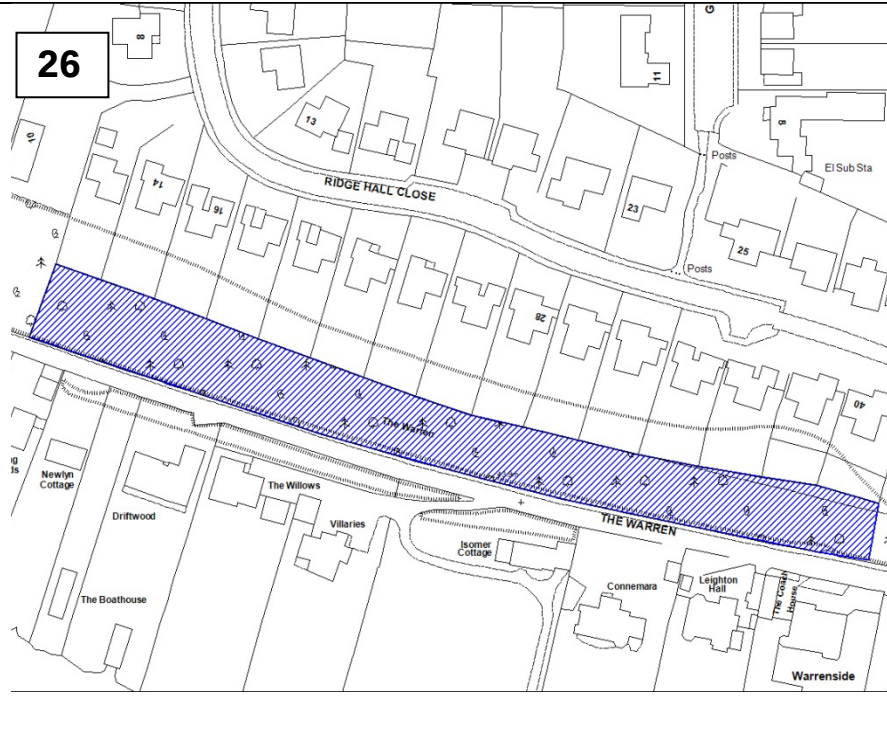
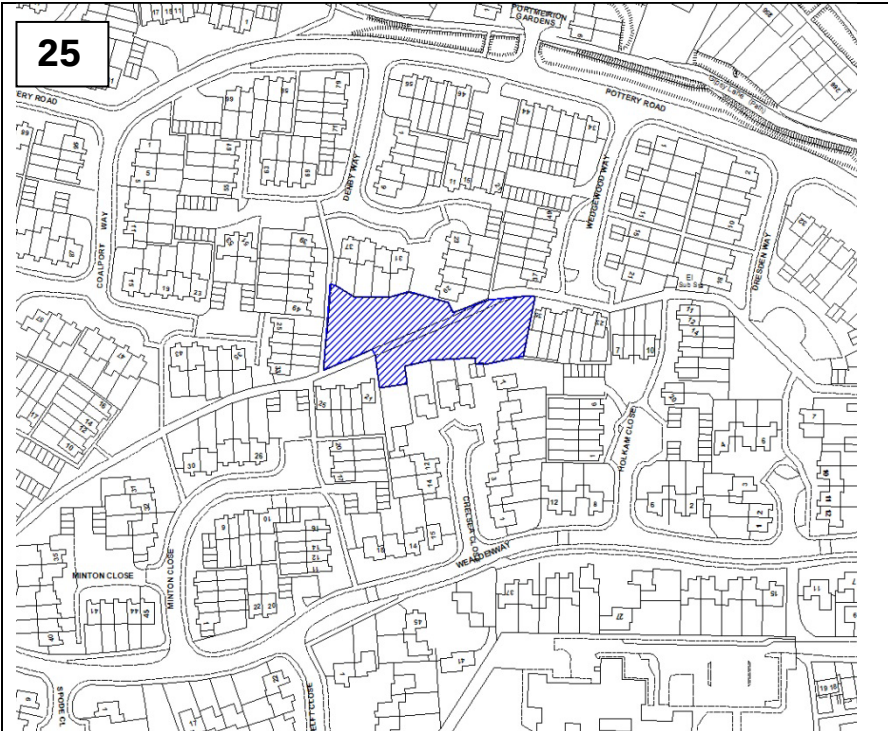
APPENDIX 3: MAPS OF ASSESSED COUNCIL-OWNED SITES

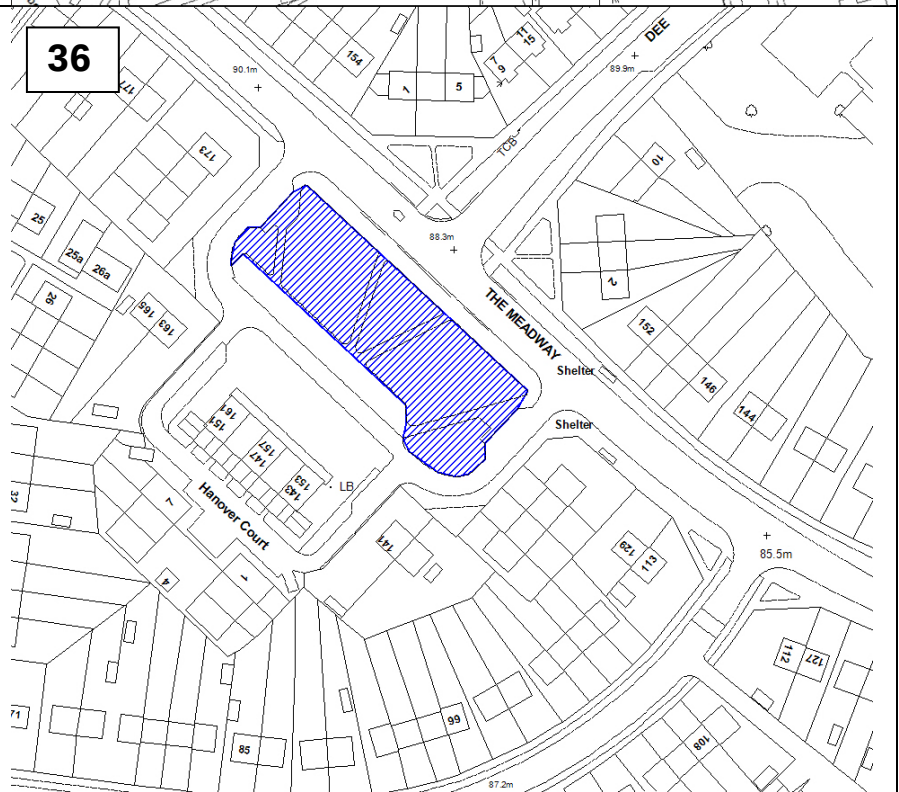
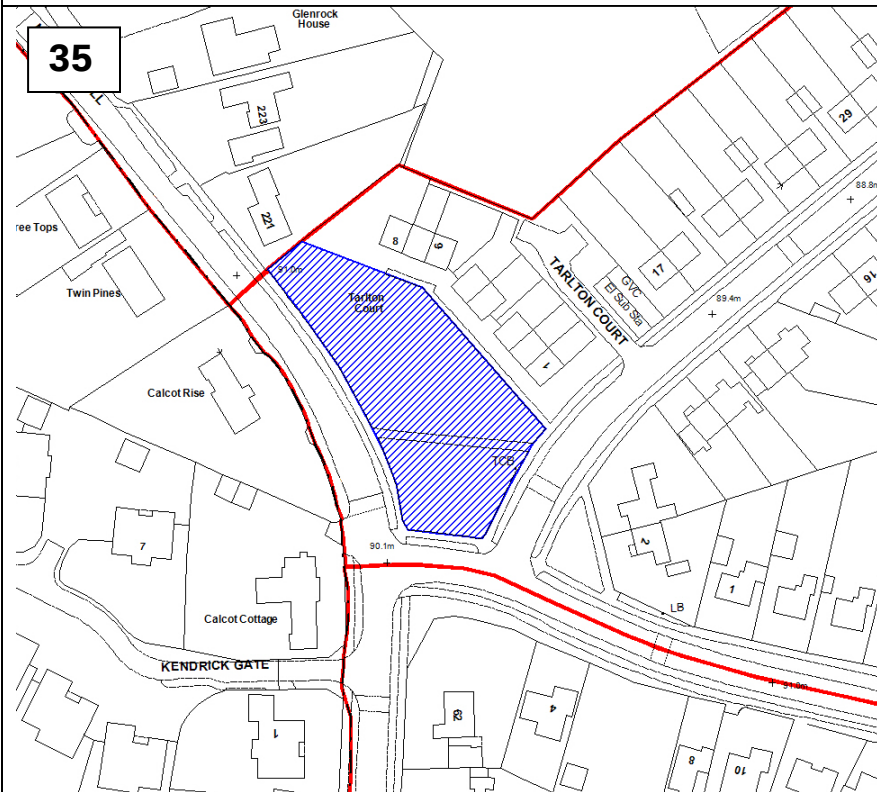
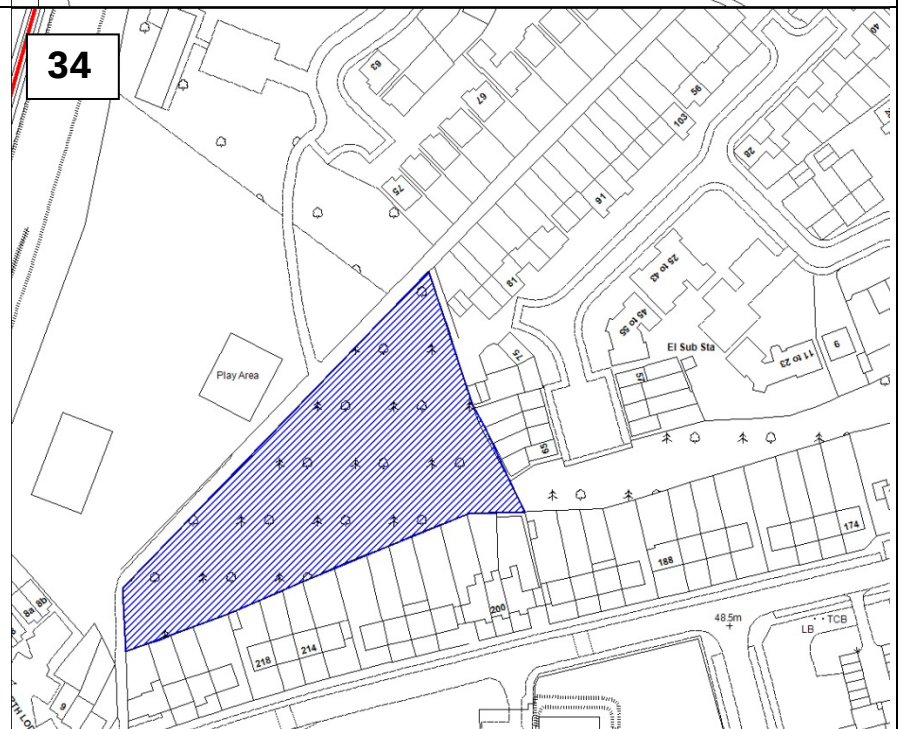
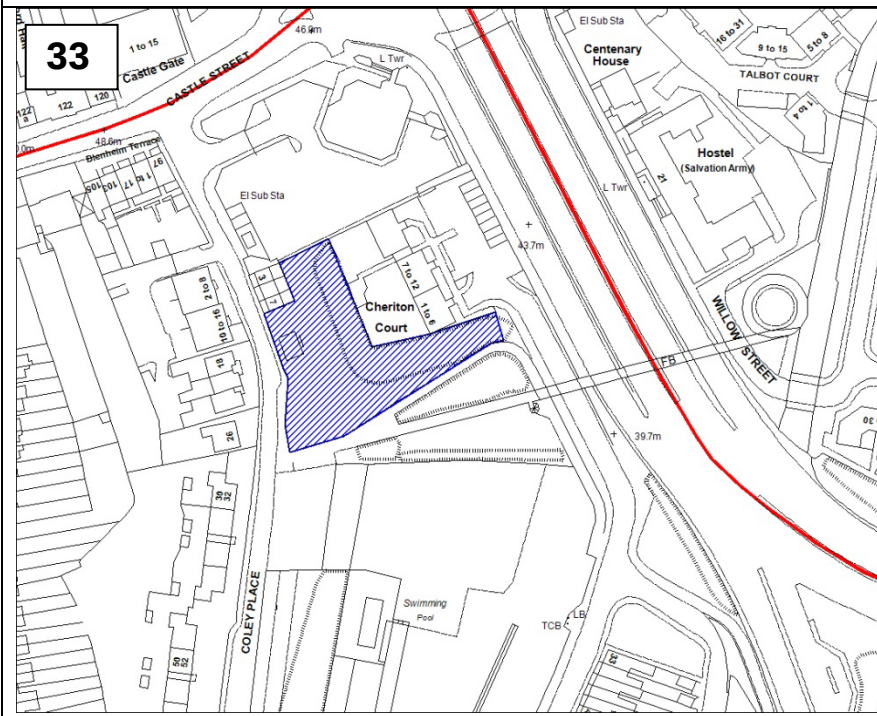
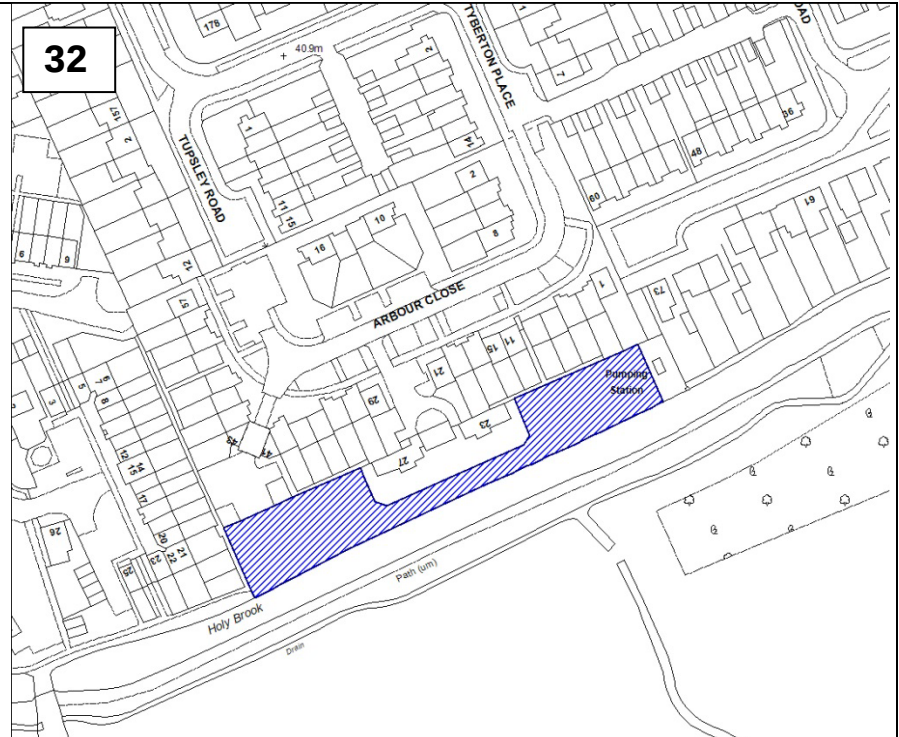
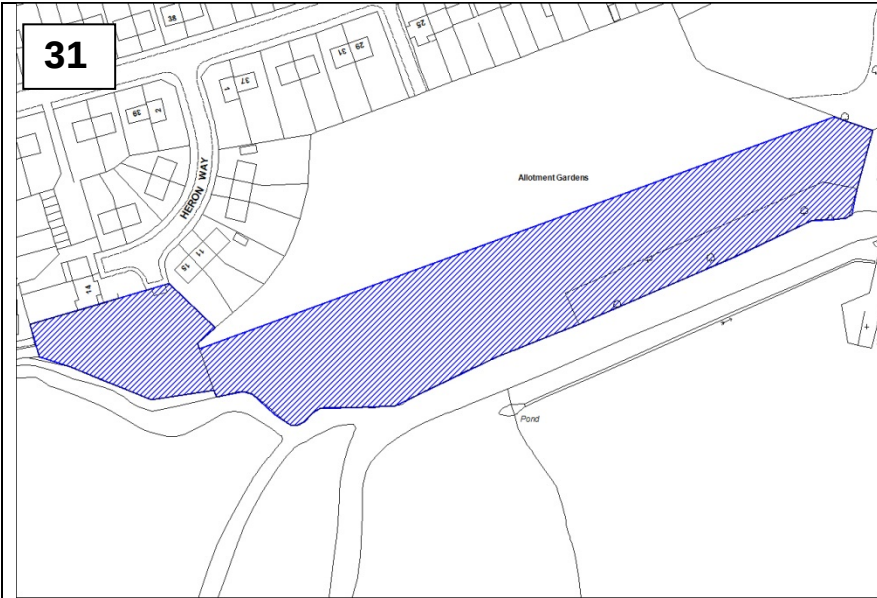


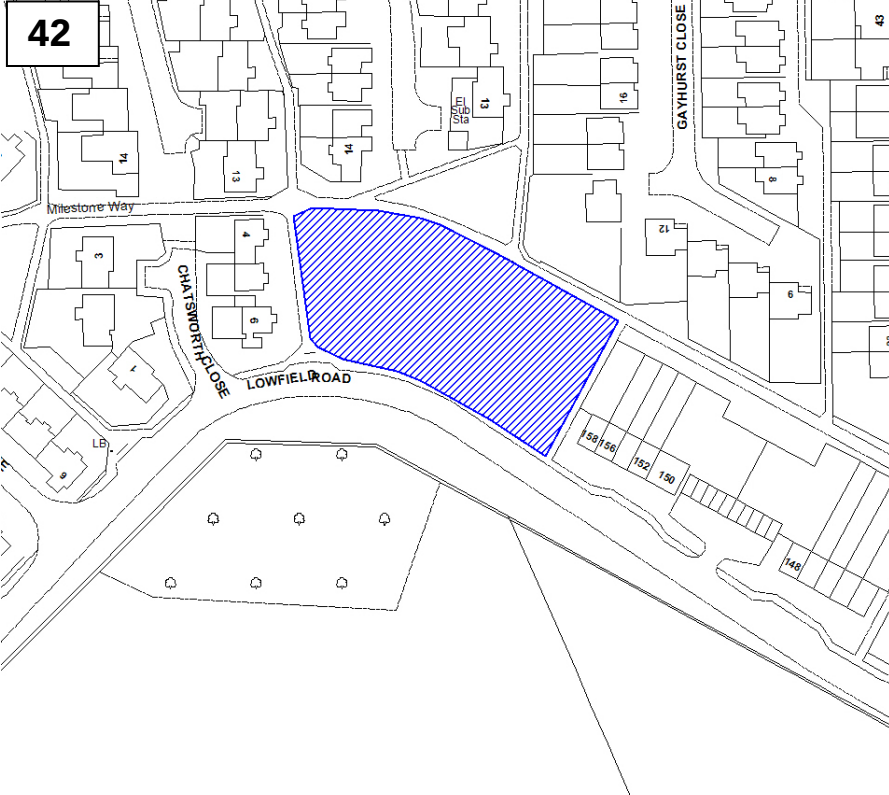
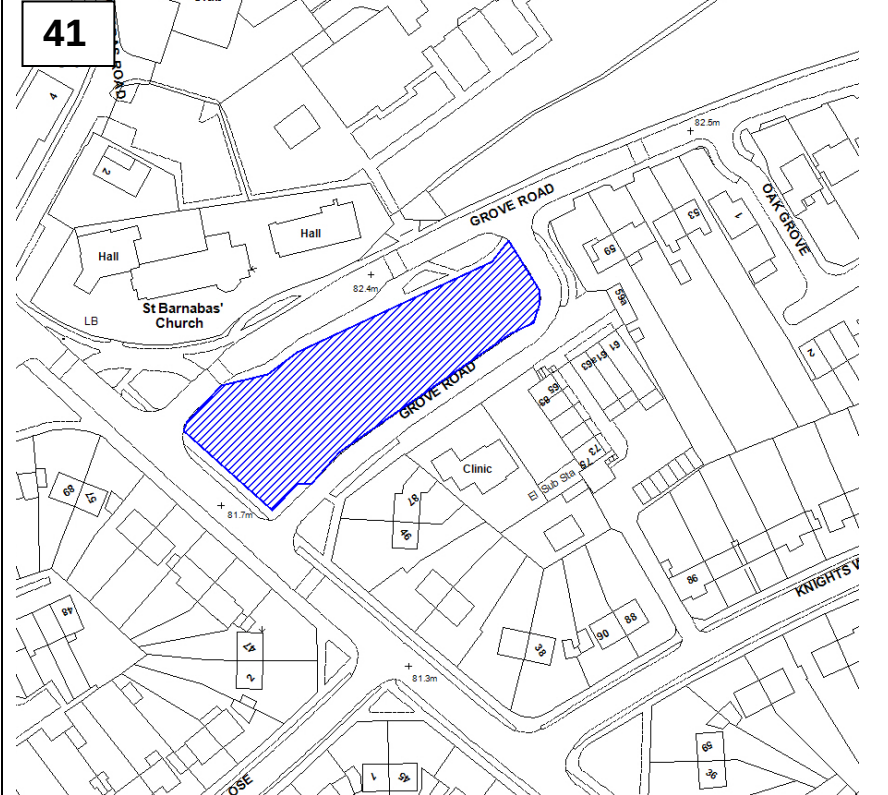
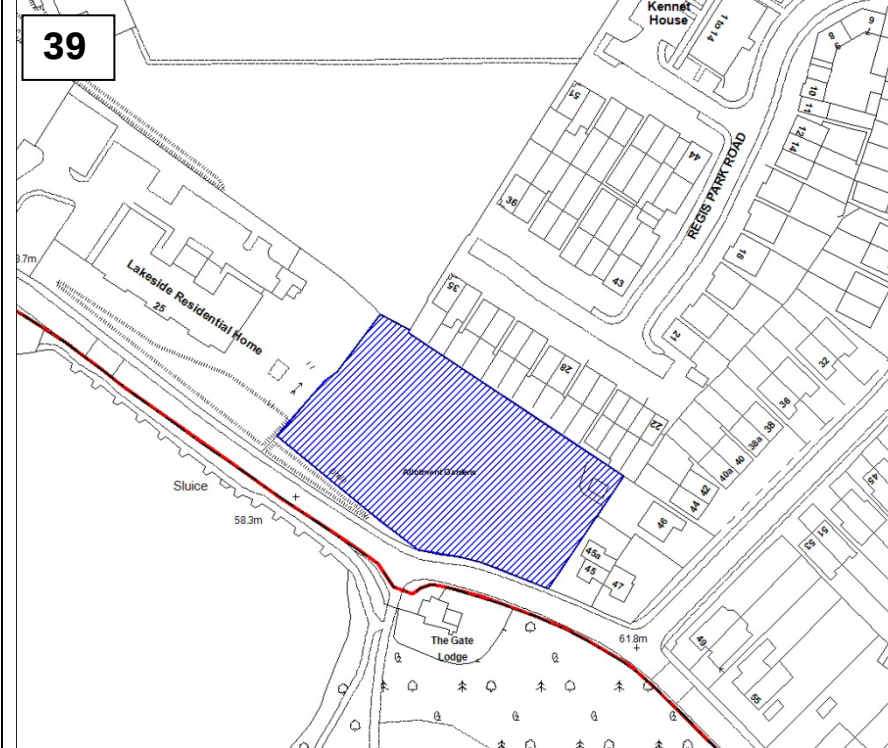
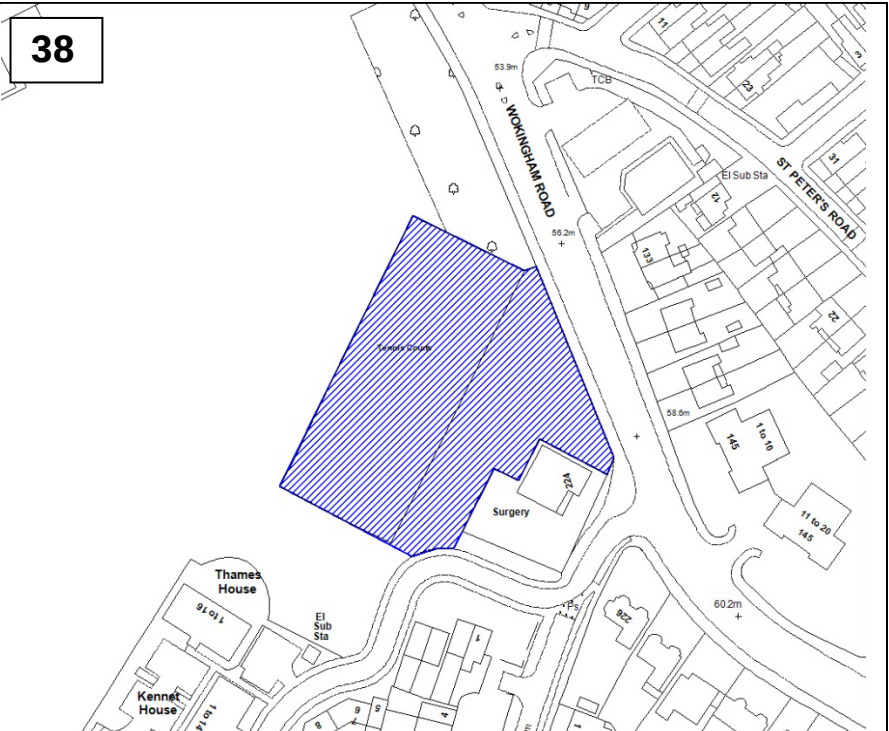
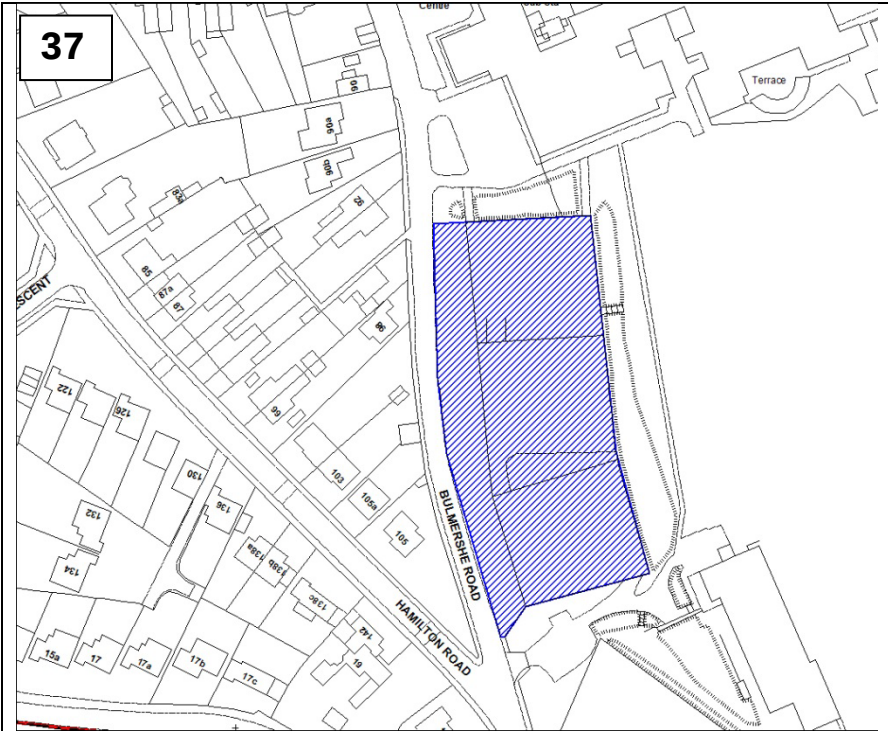


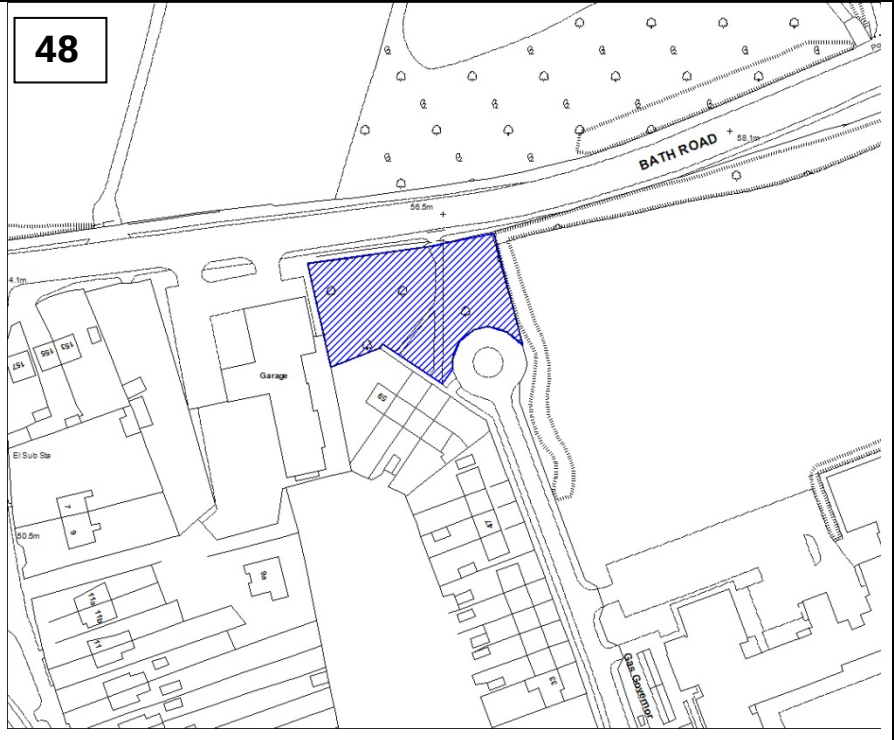
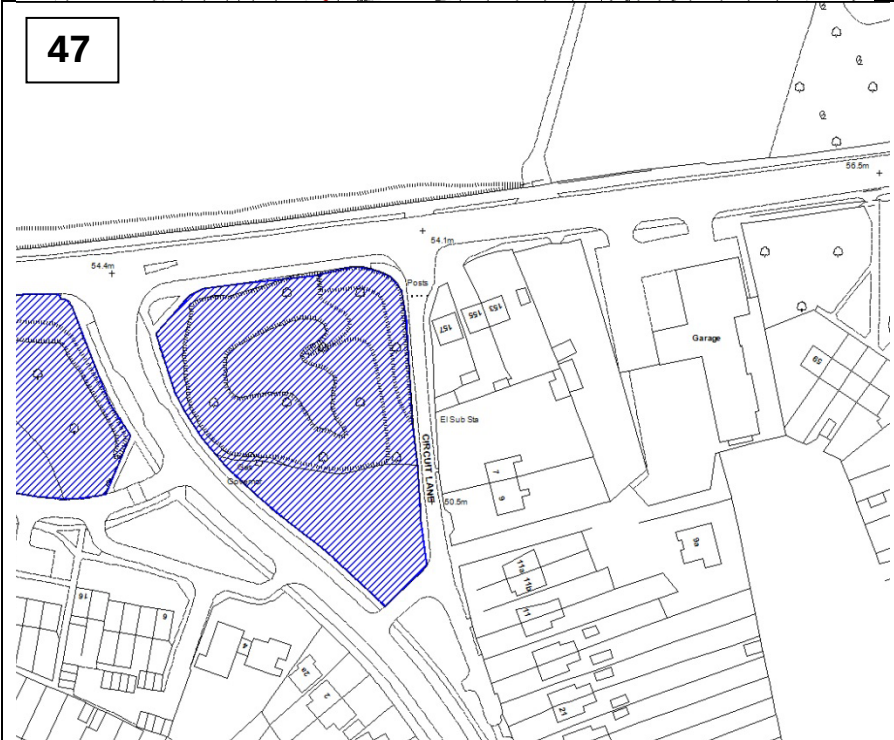
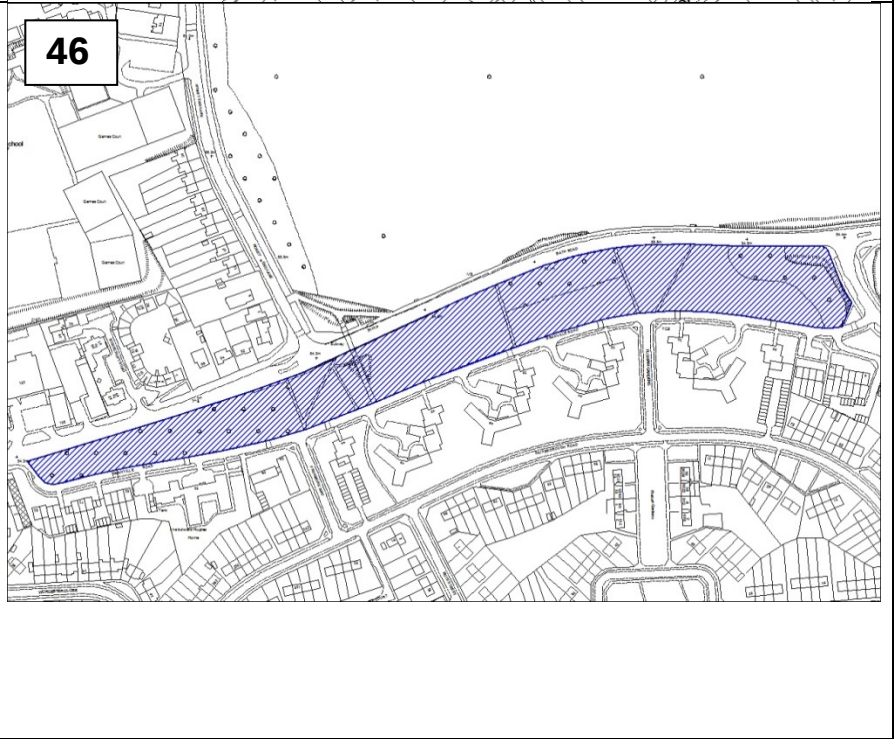
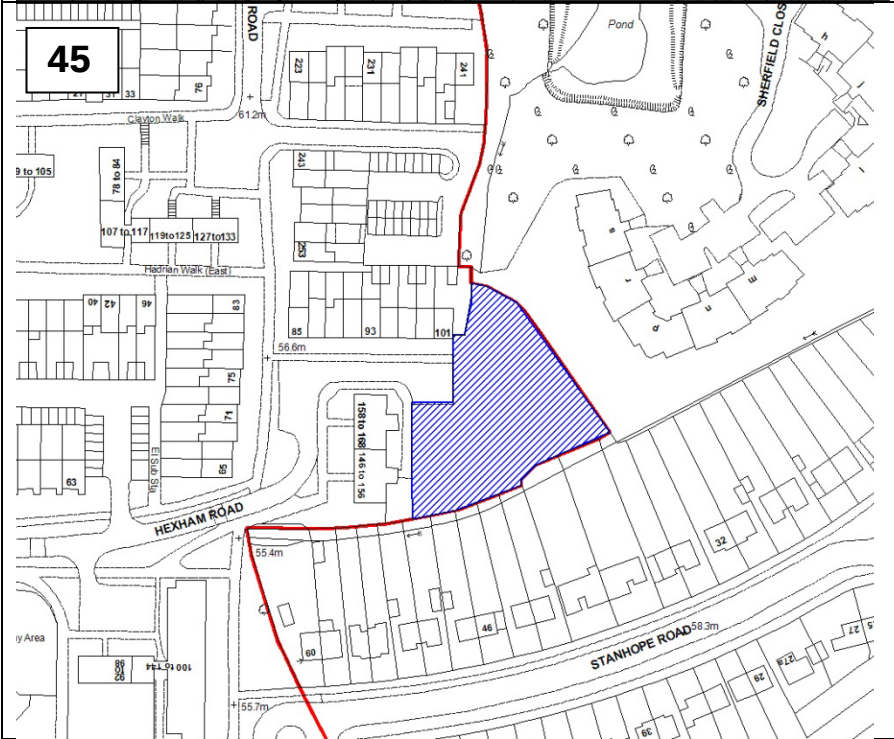
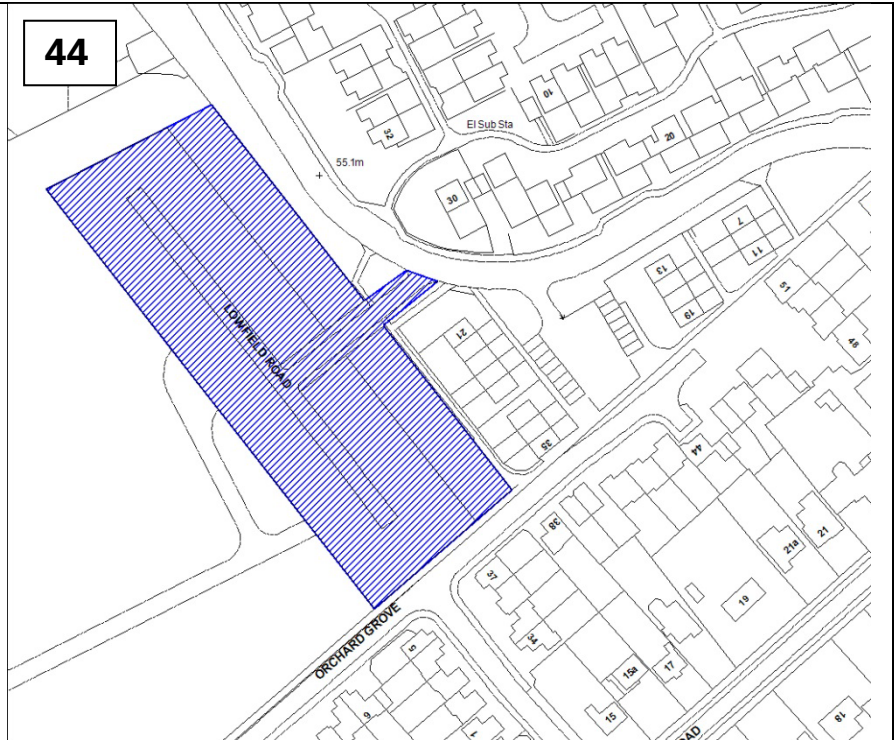
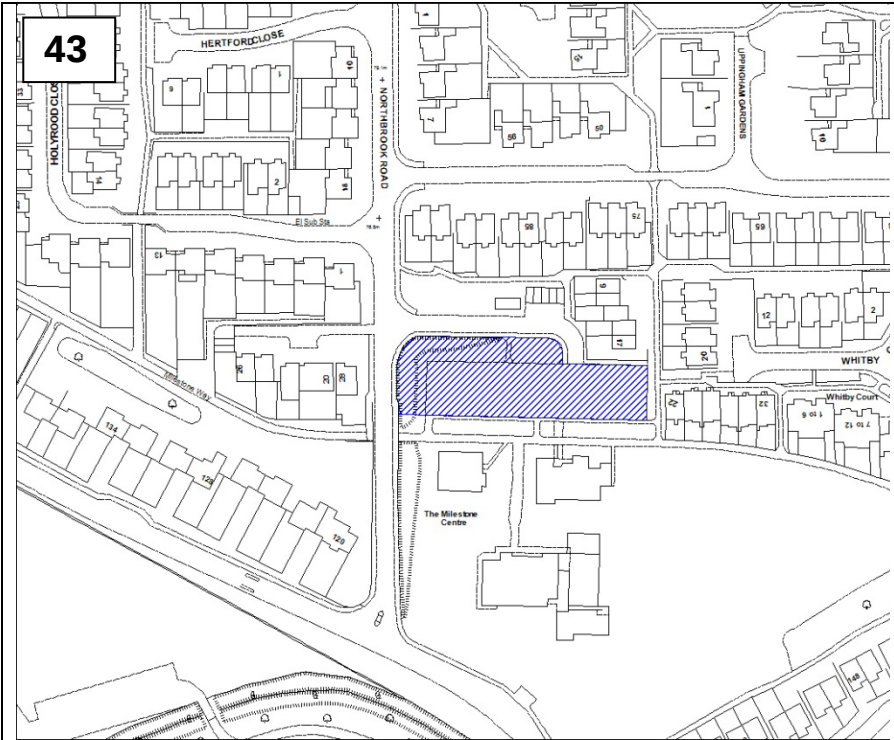


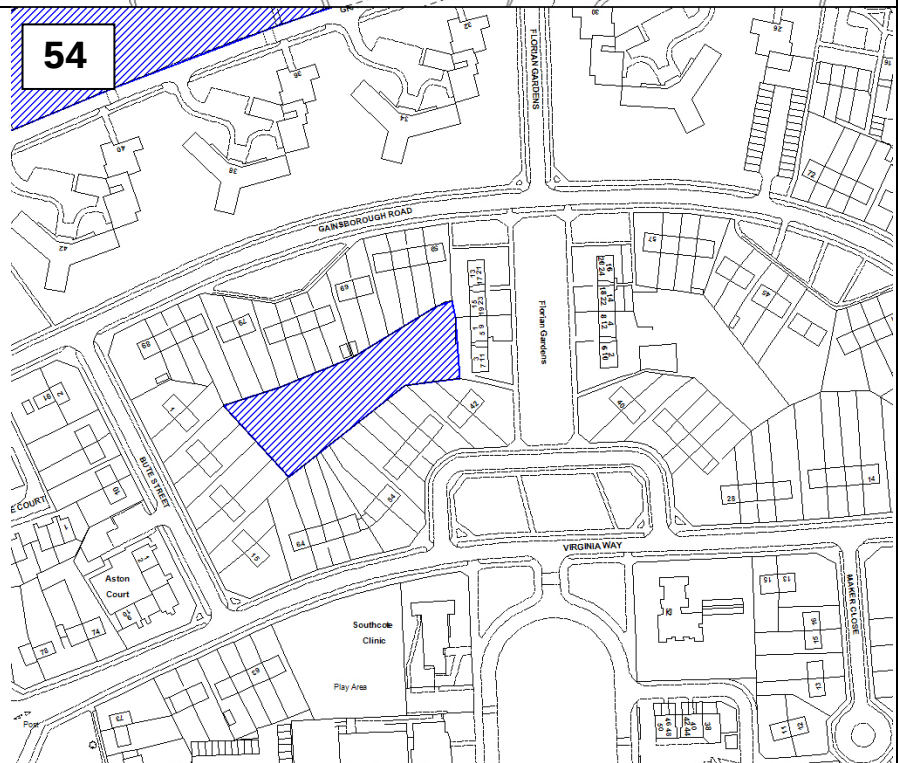
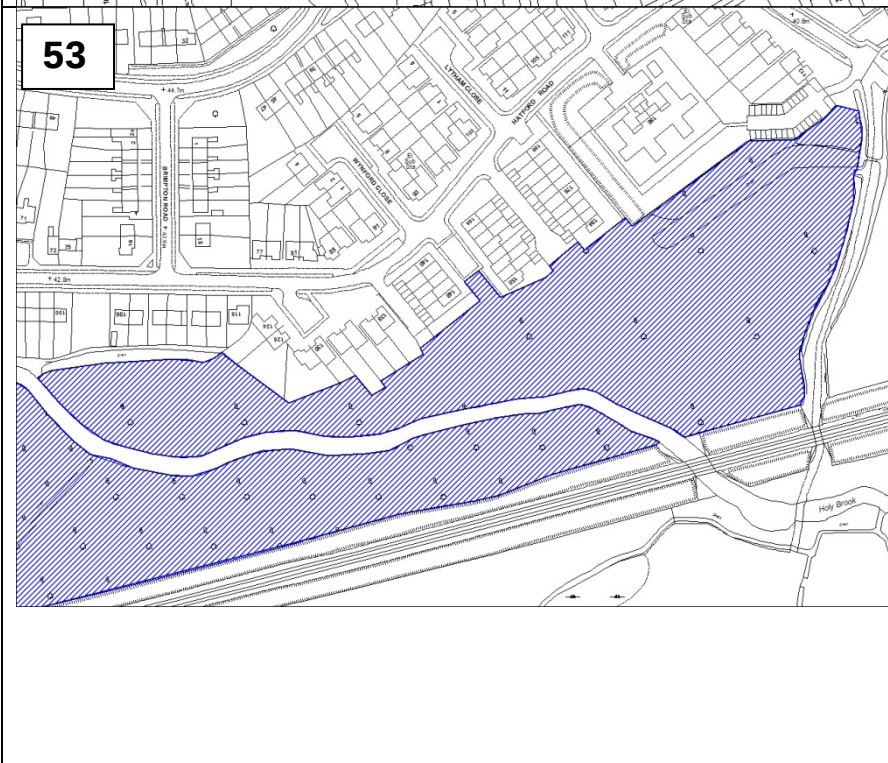
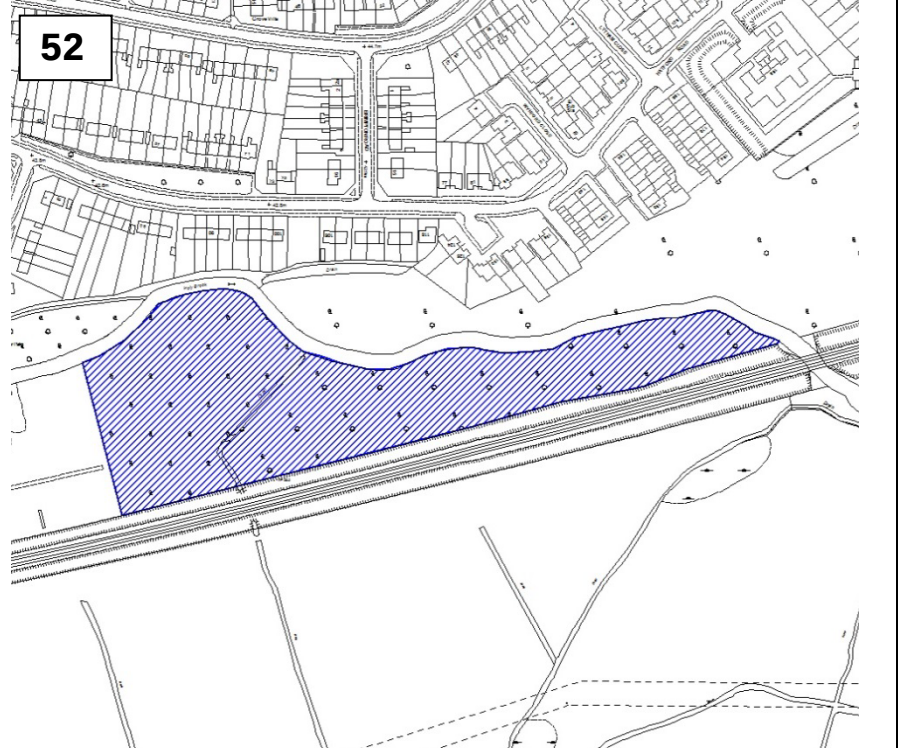
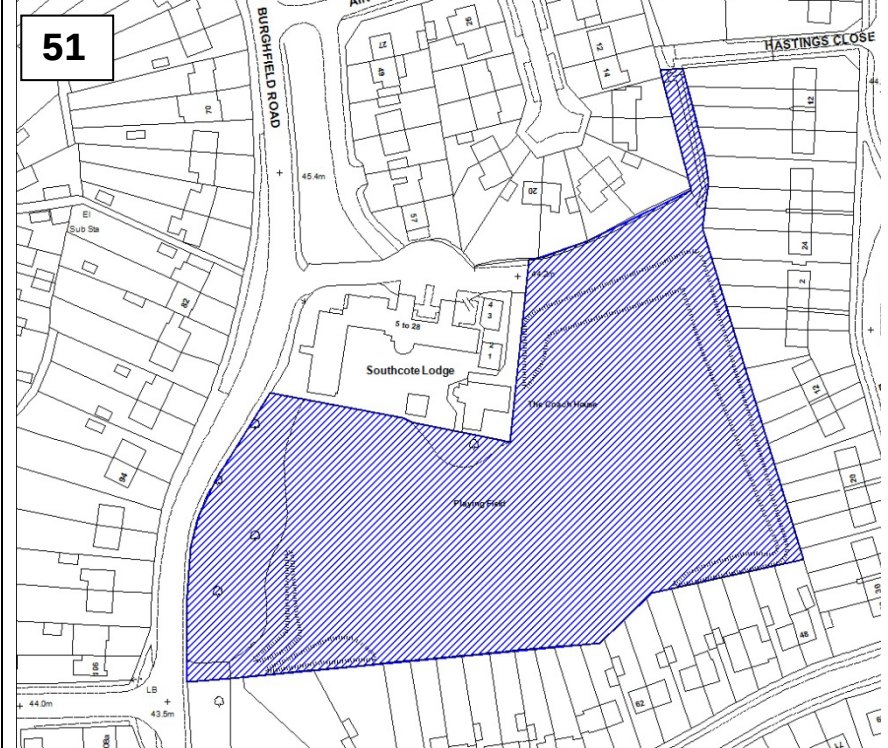
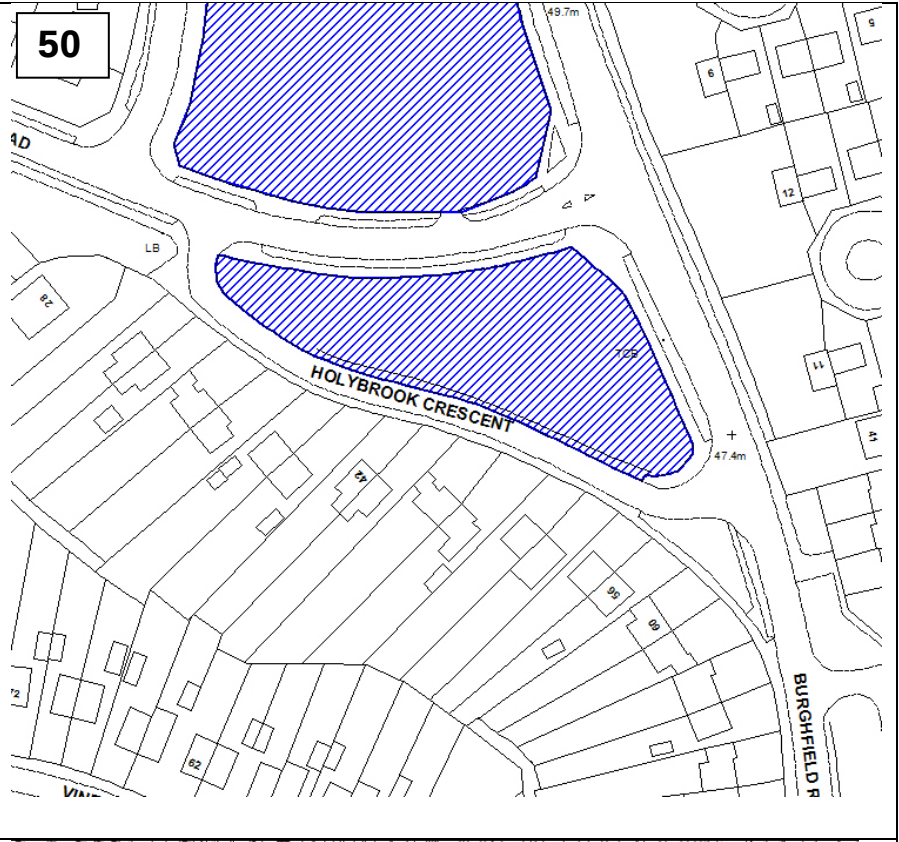
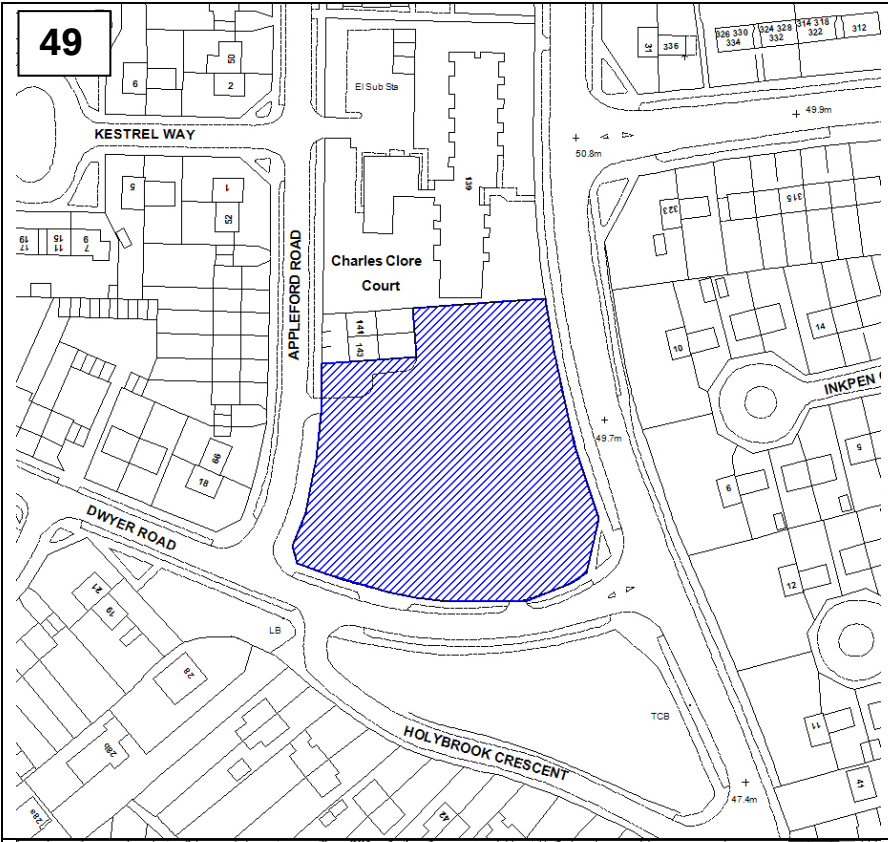


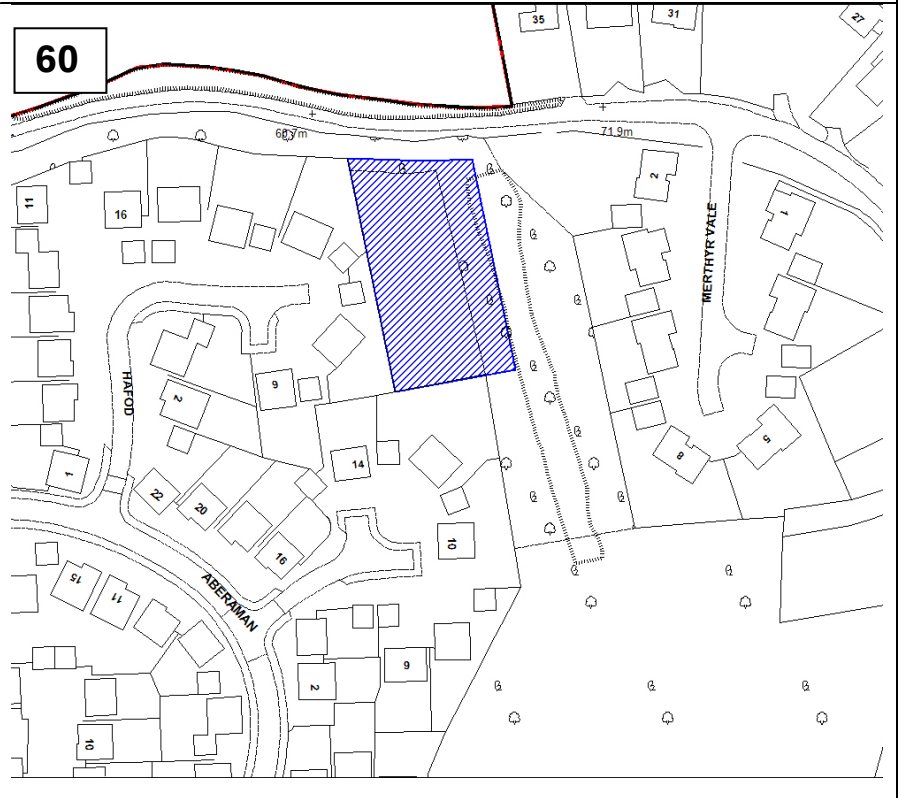
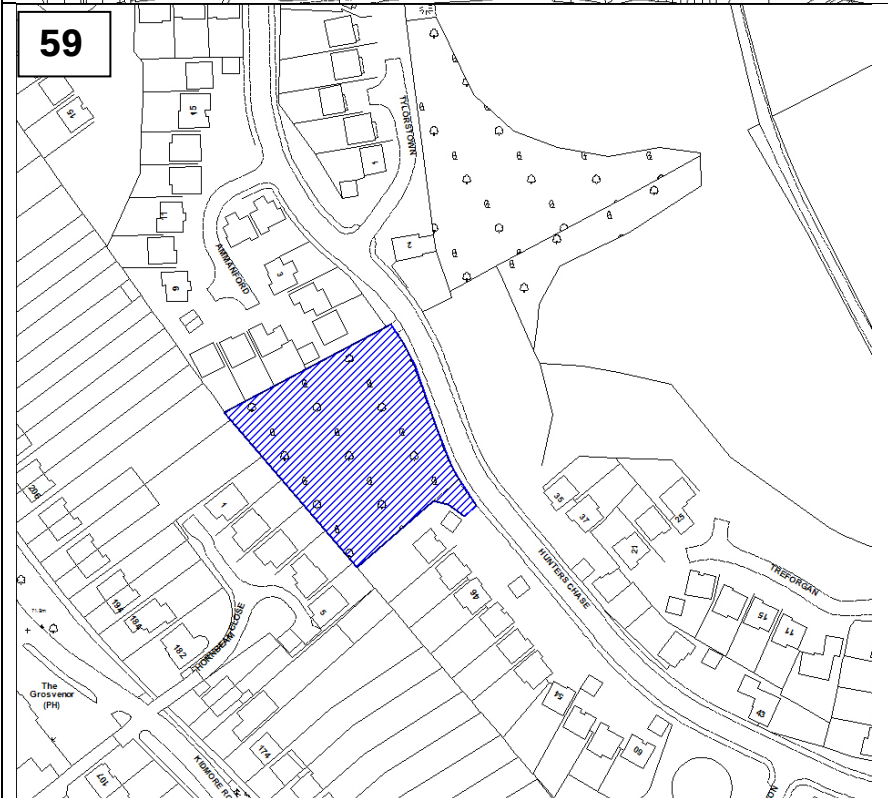
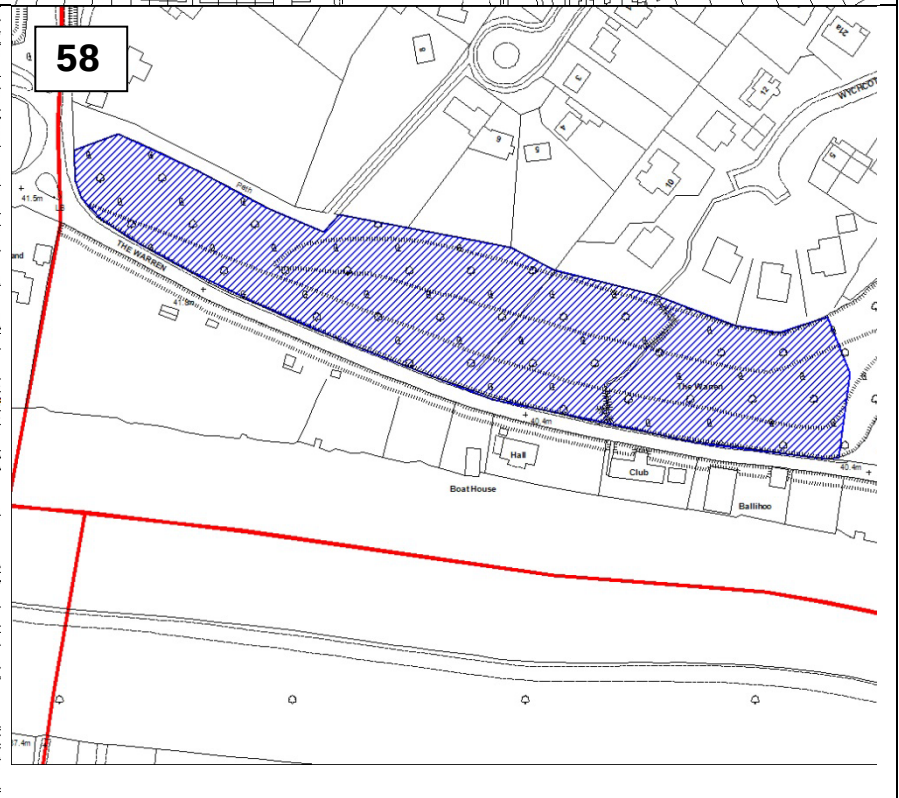
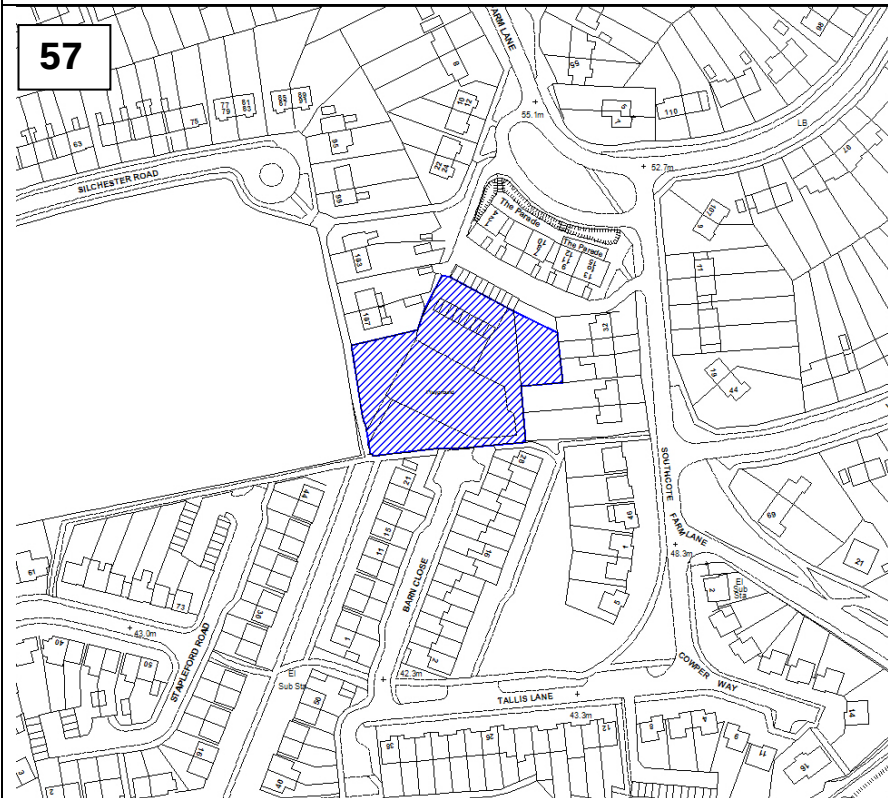
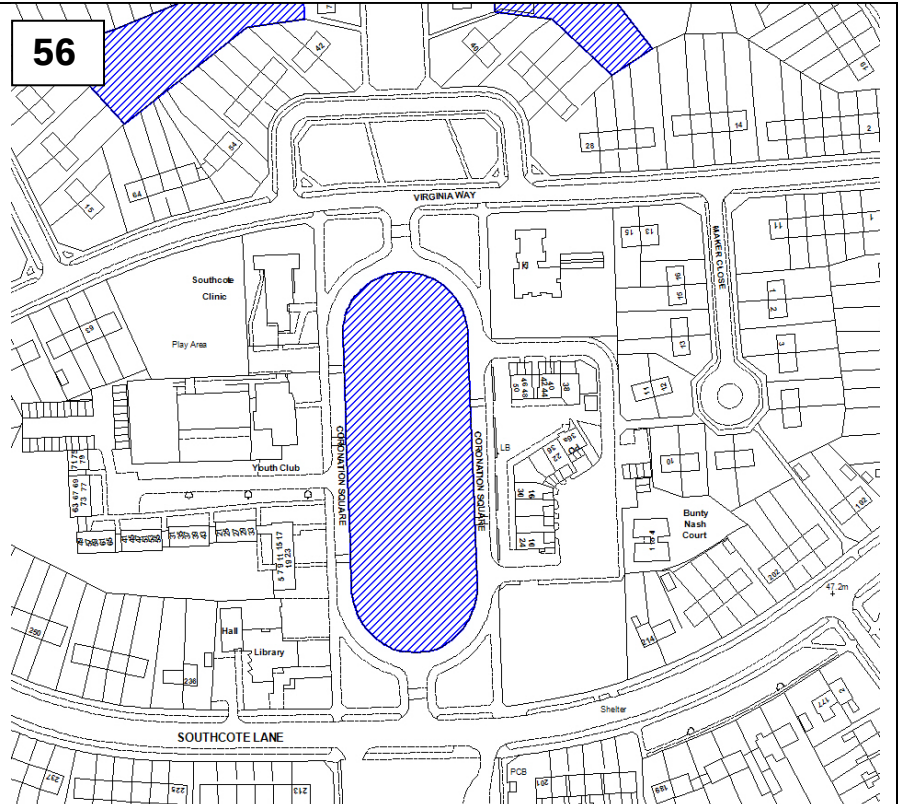
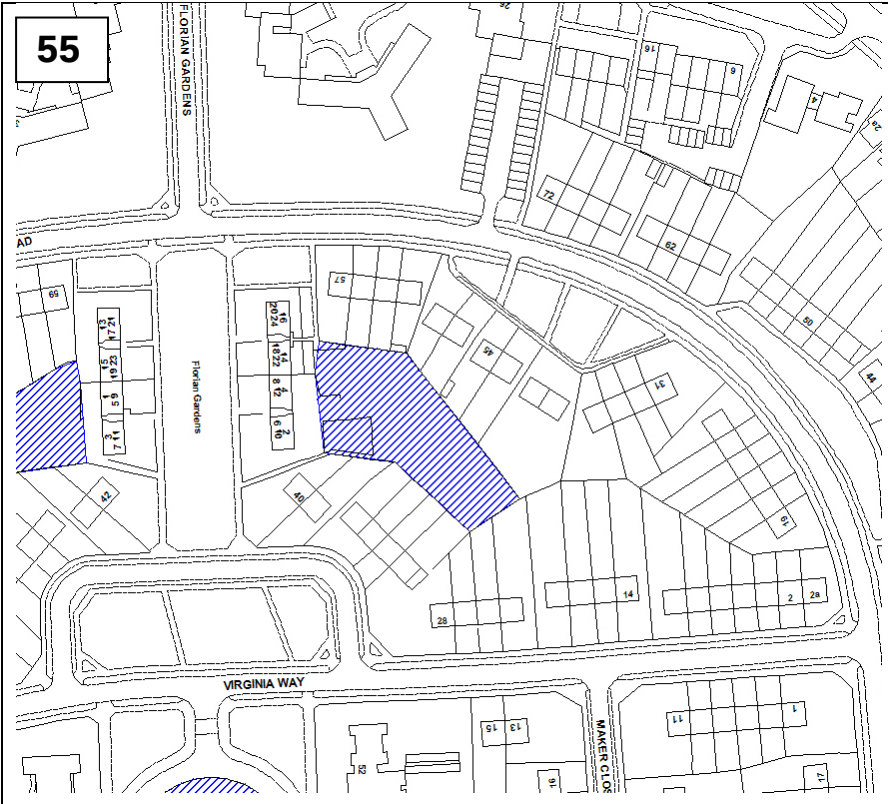


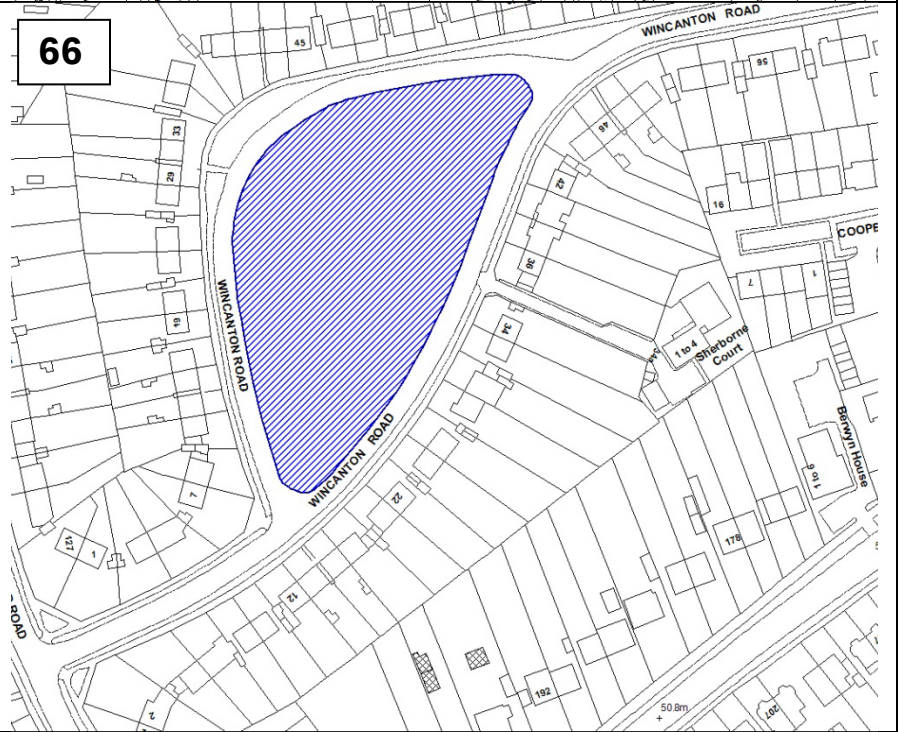
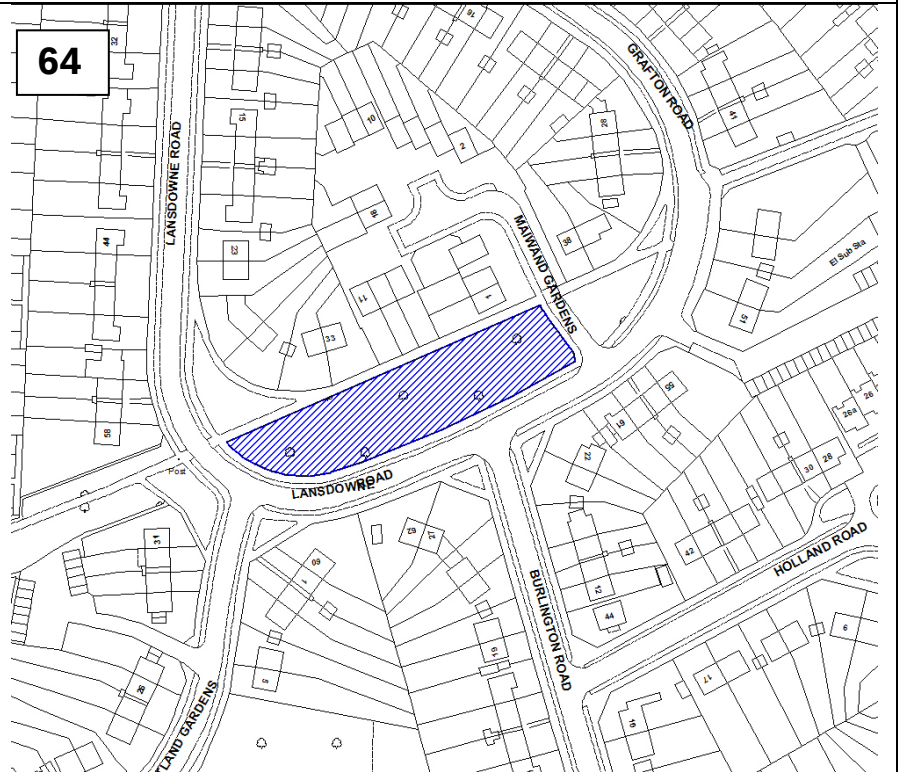
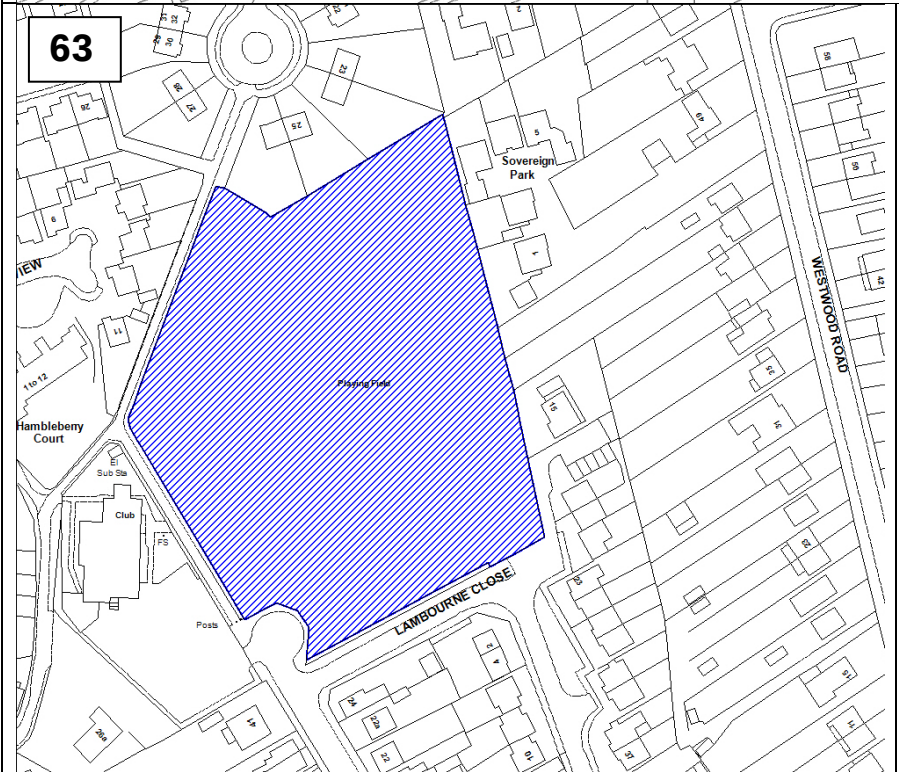
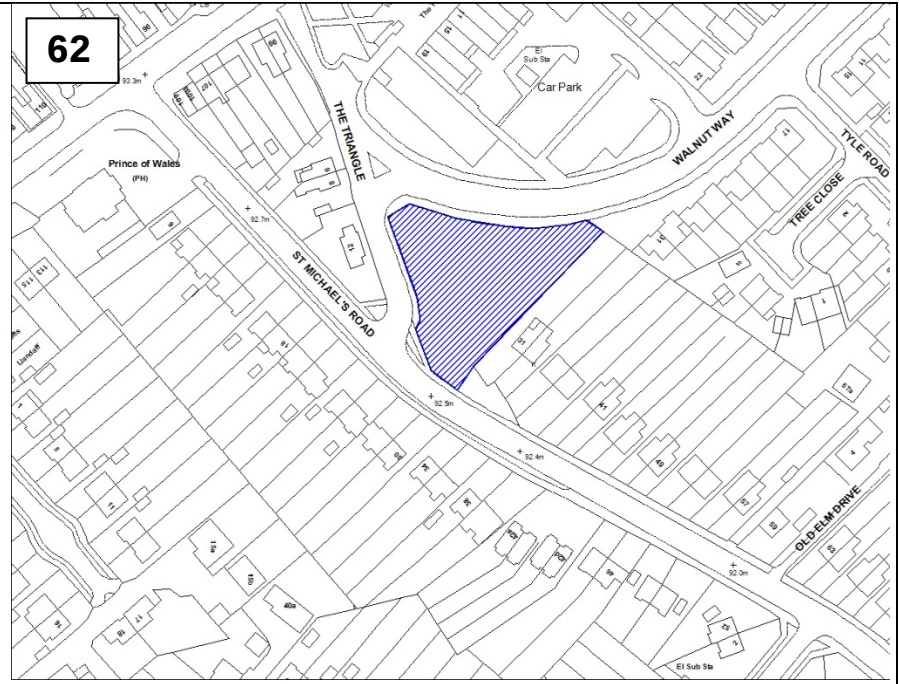
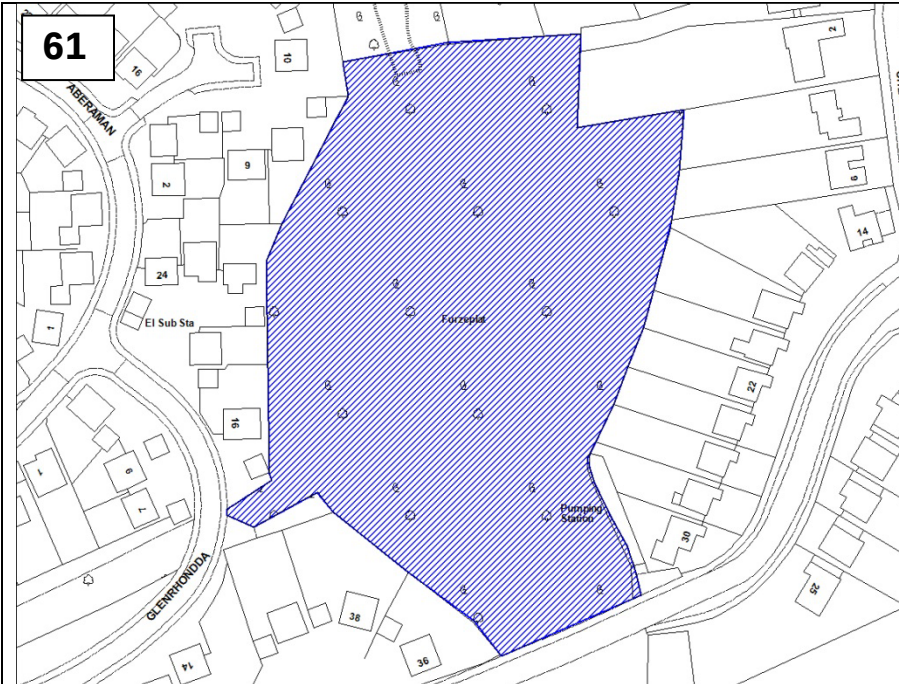


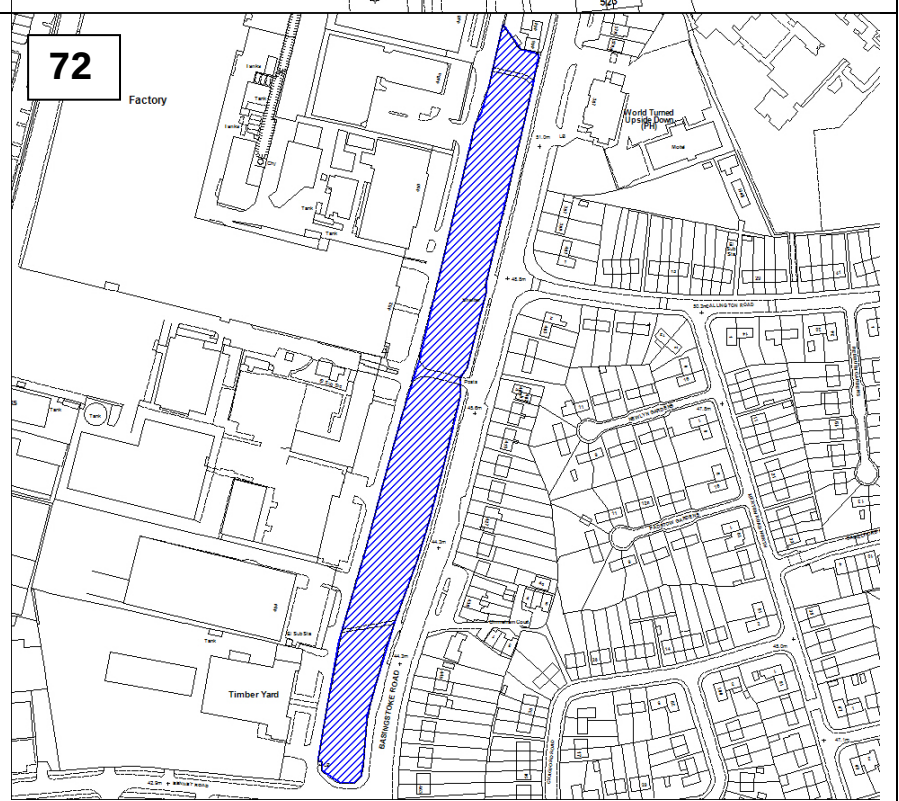
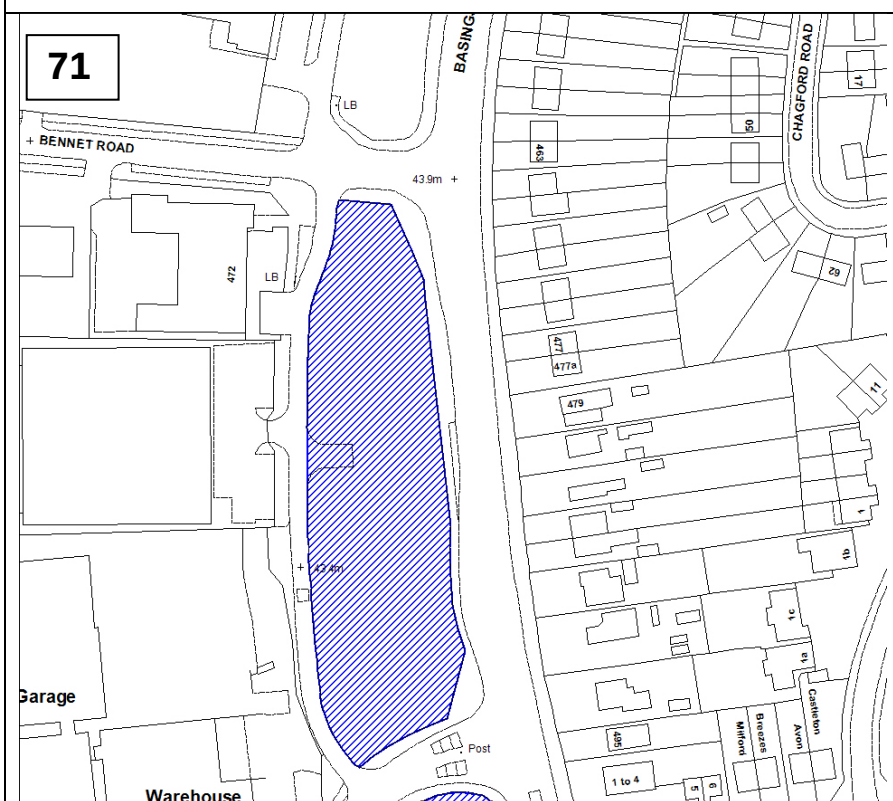
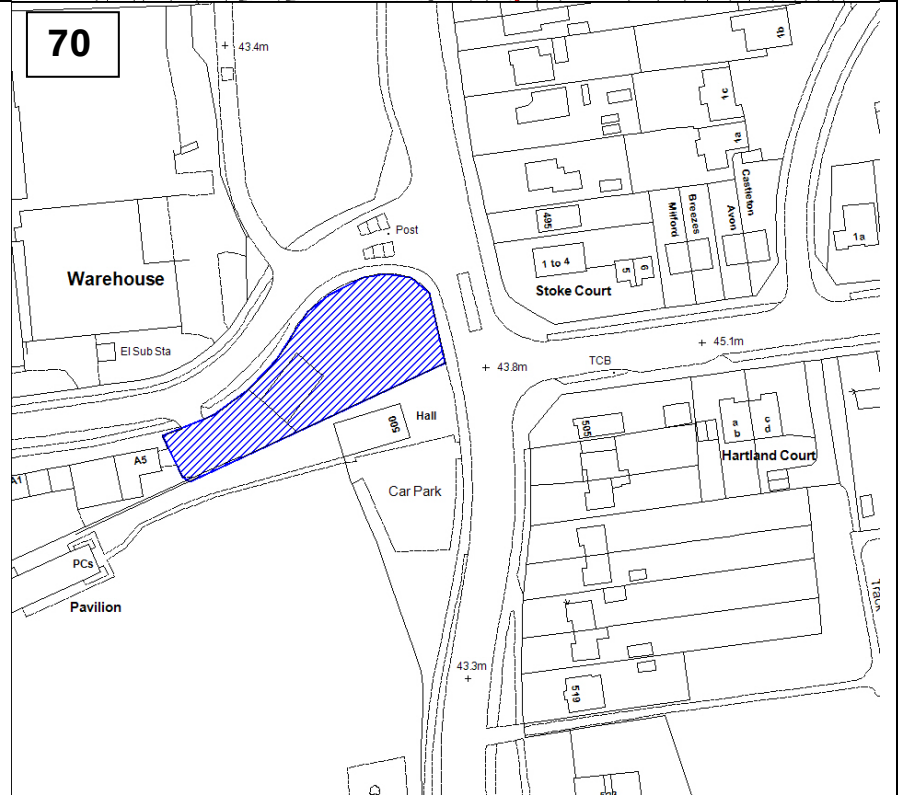
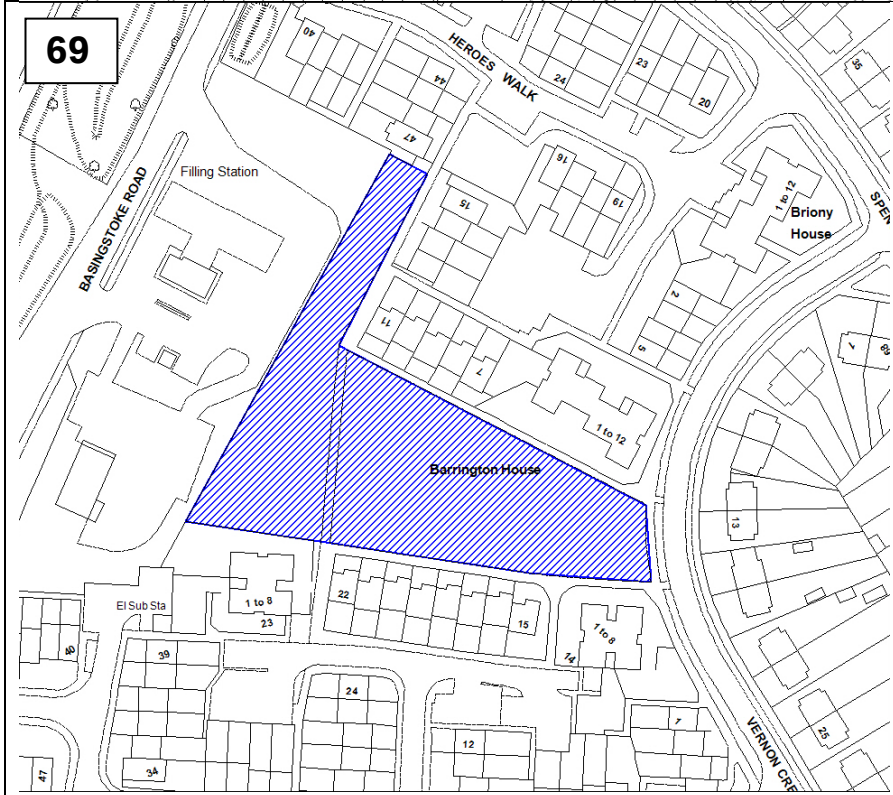
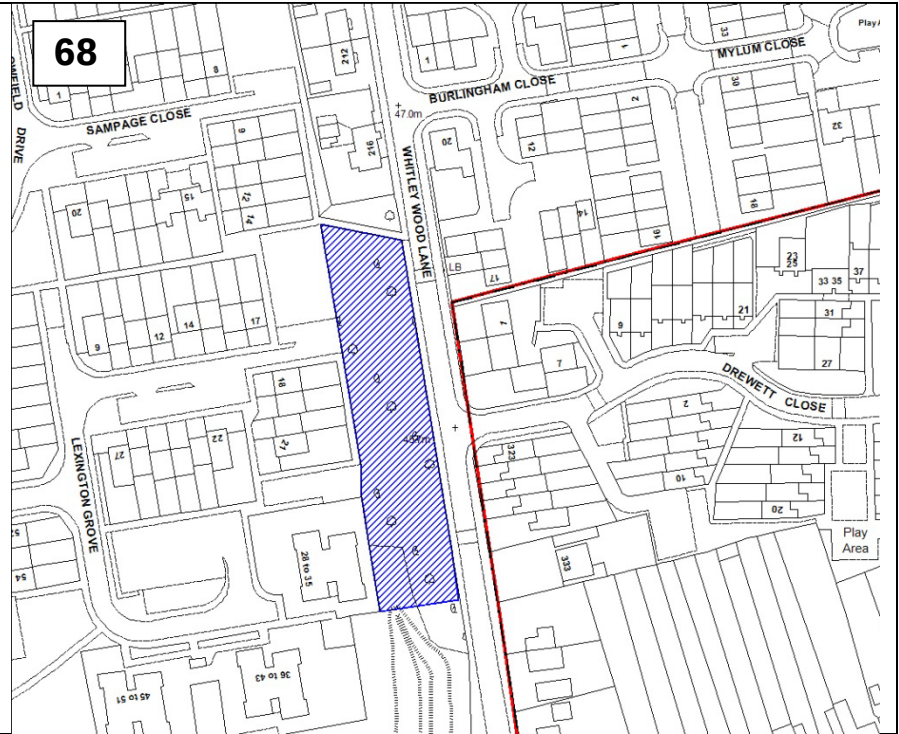
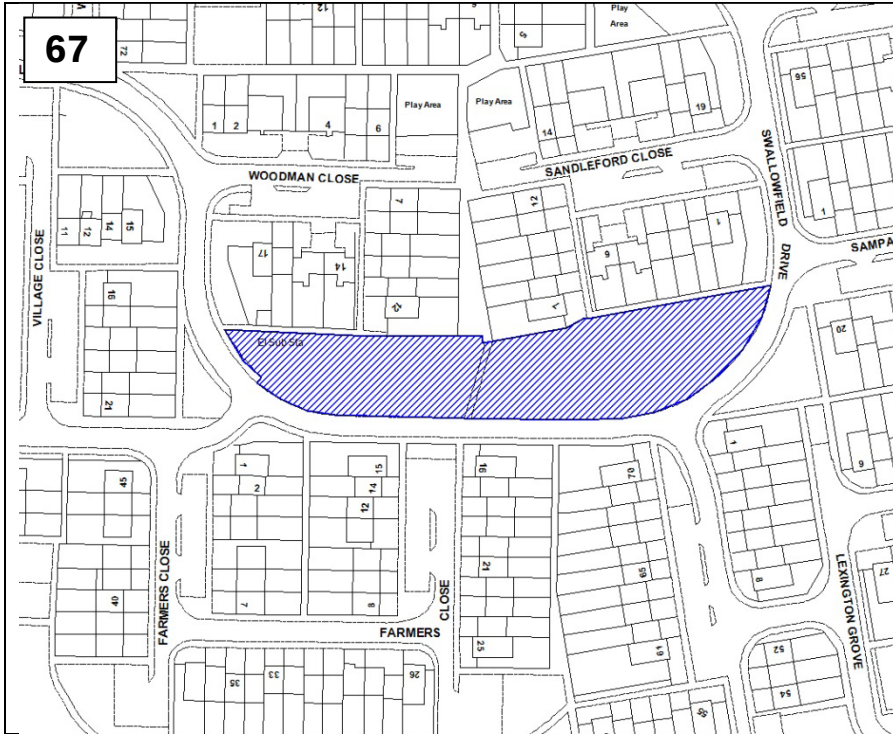


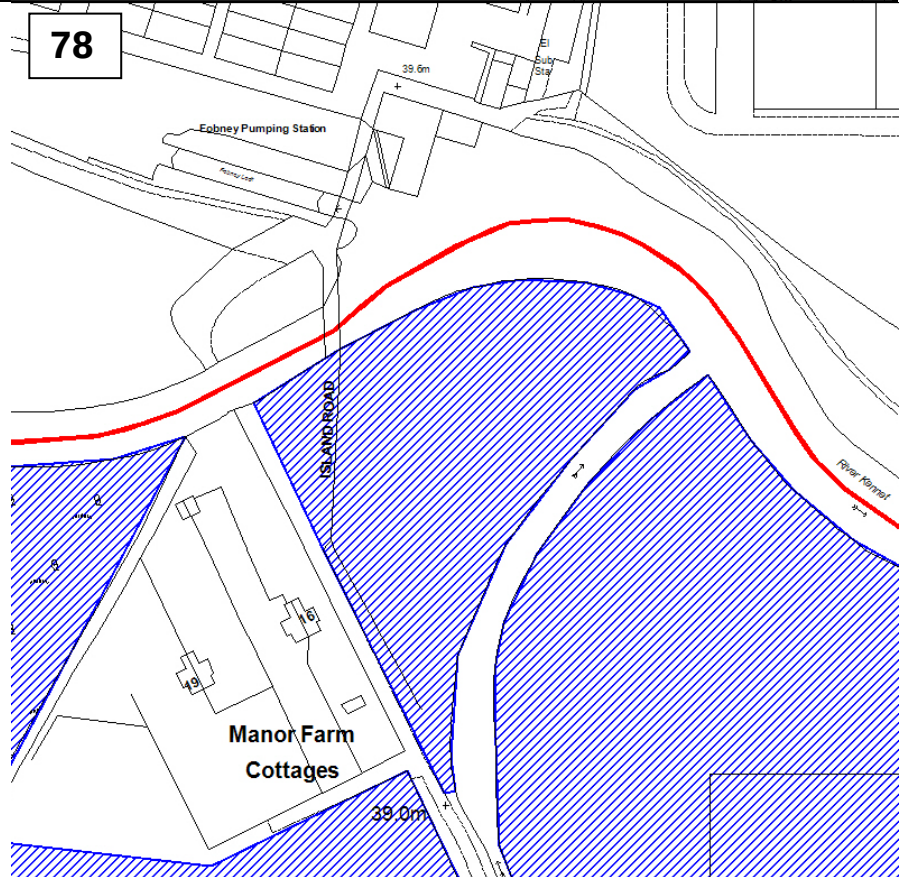
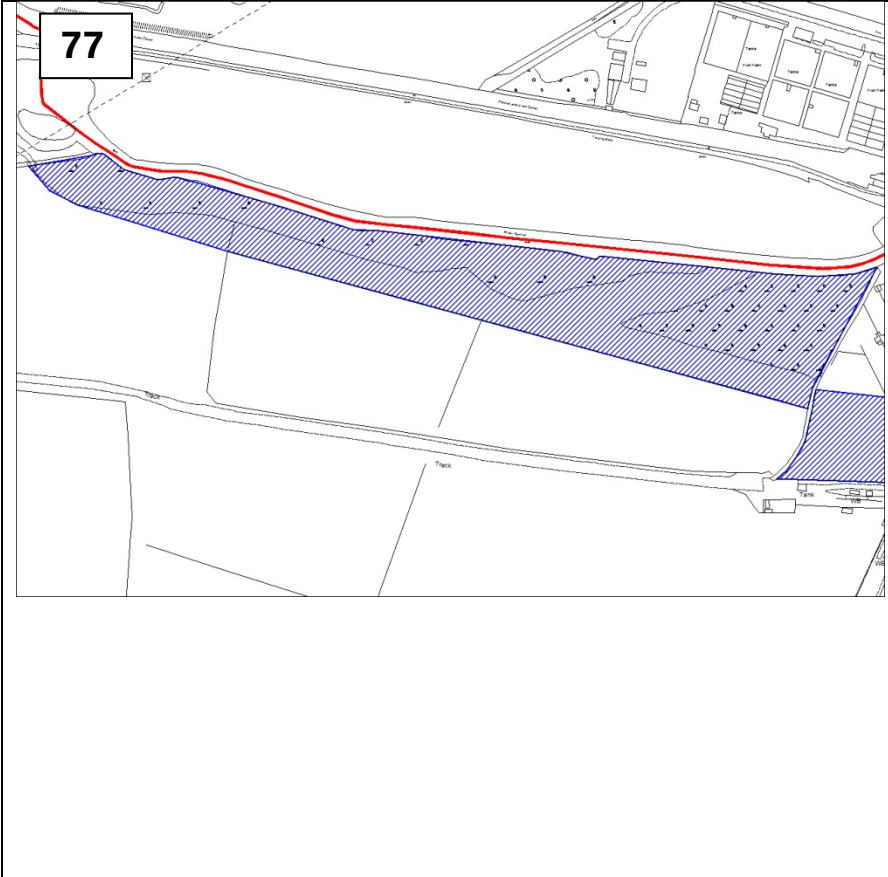
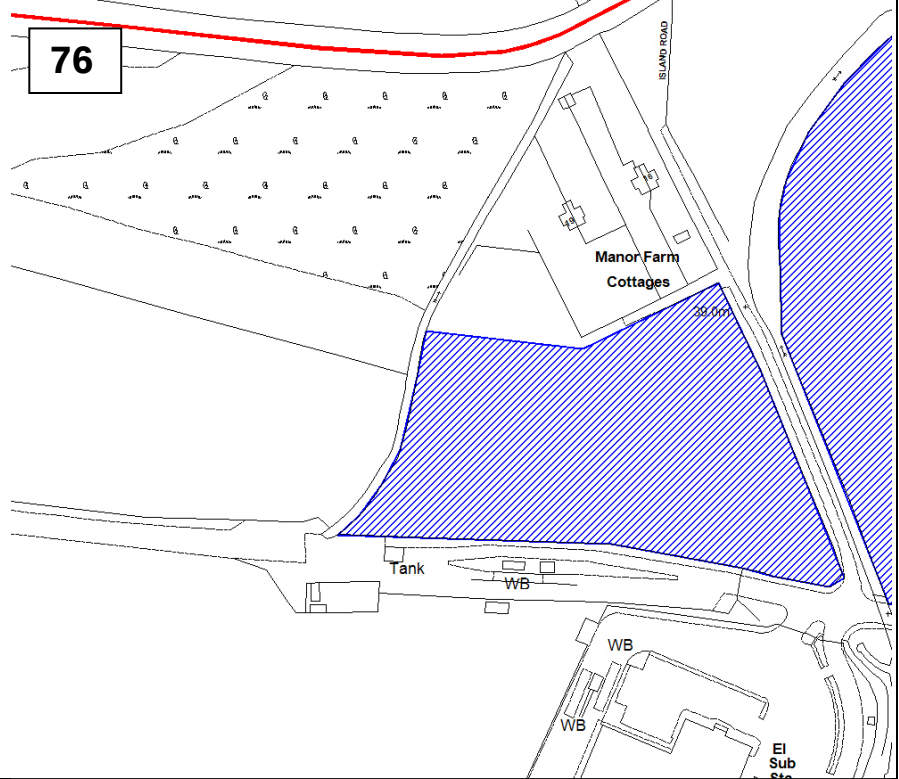
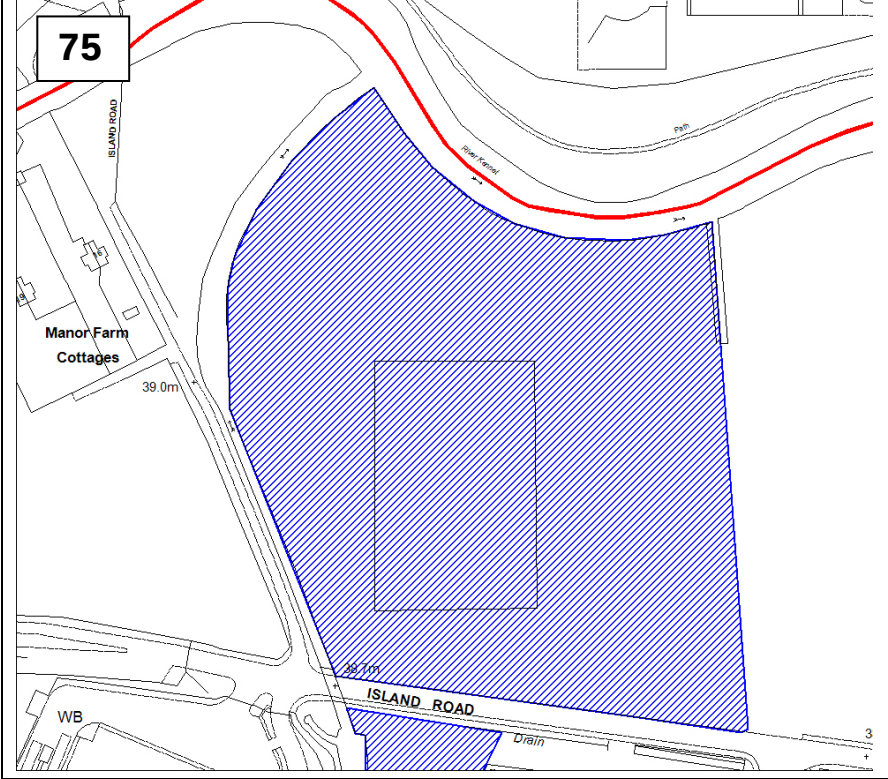
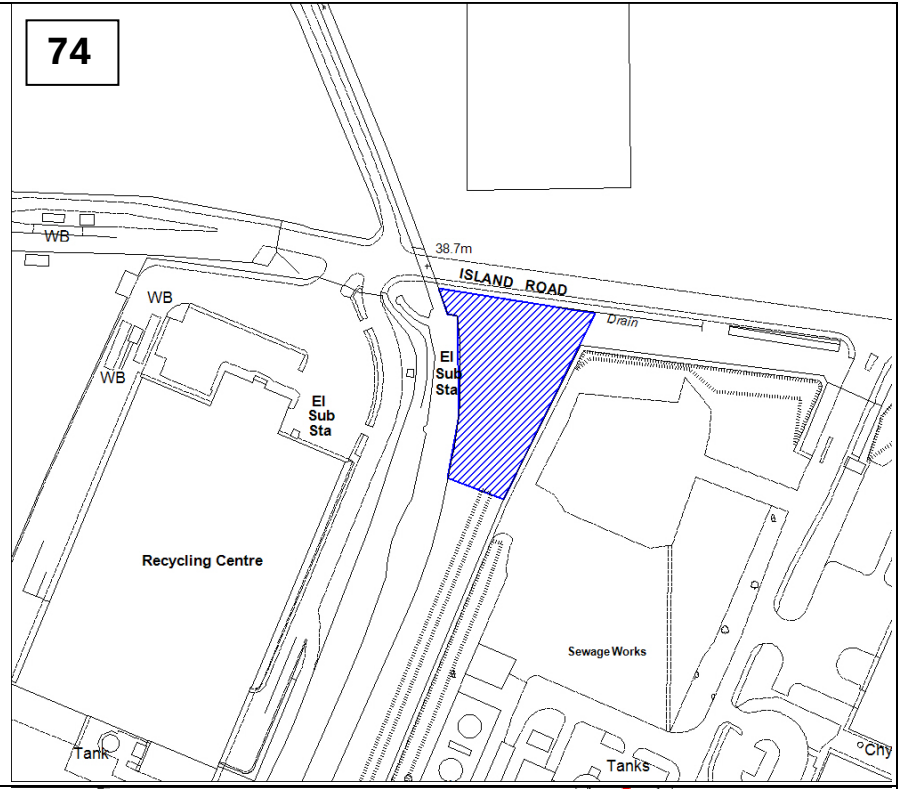
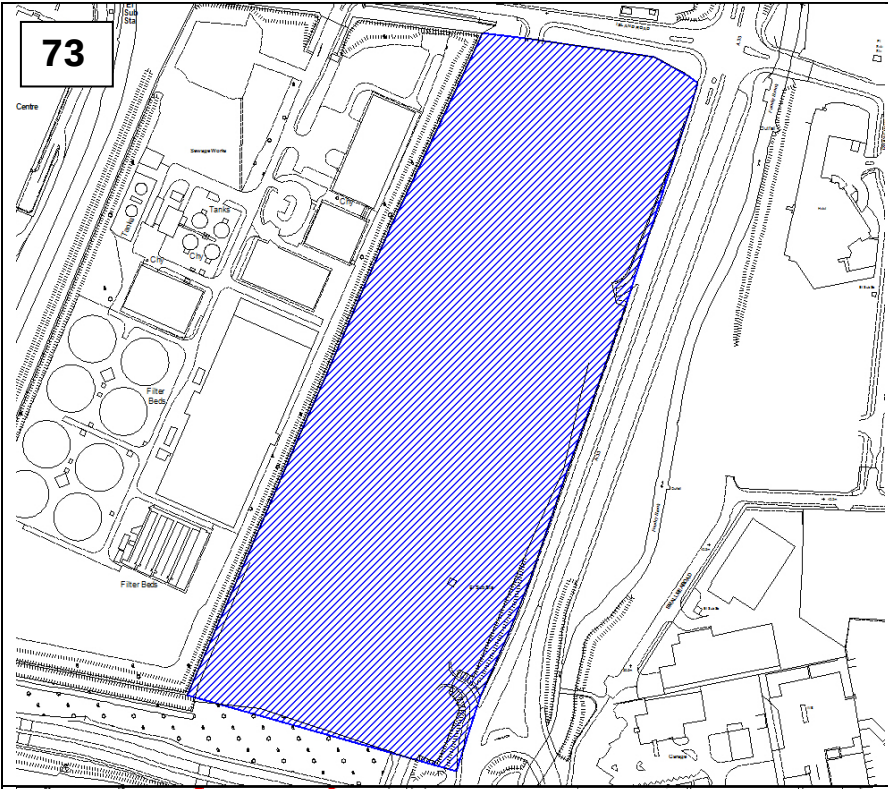


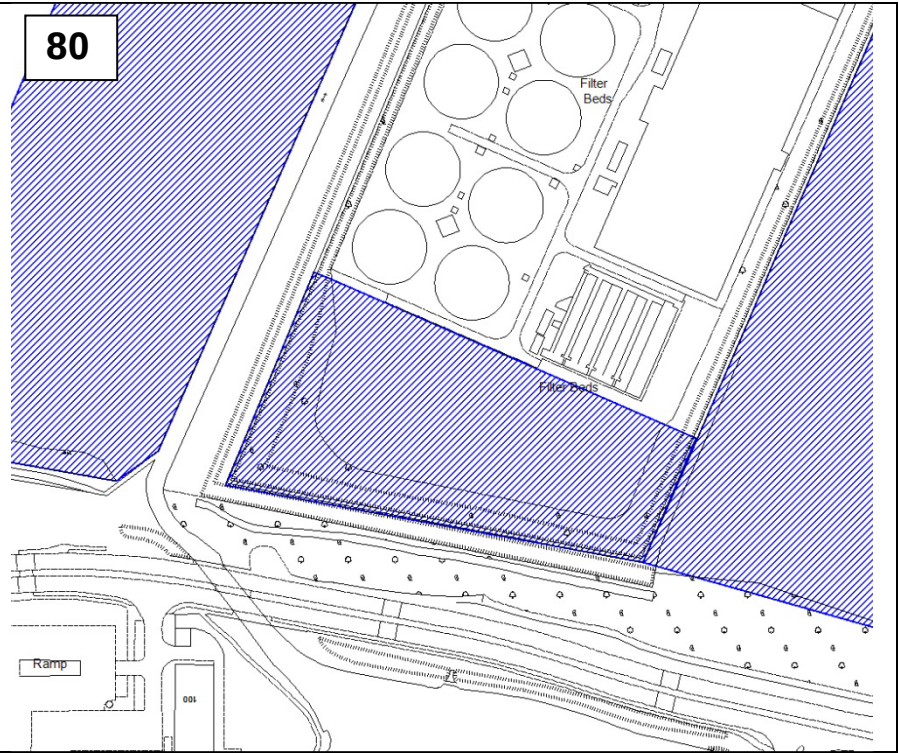
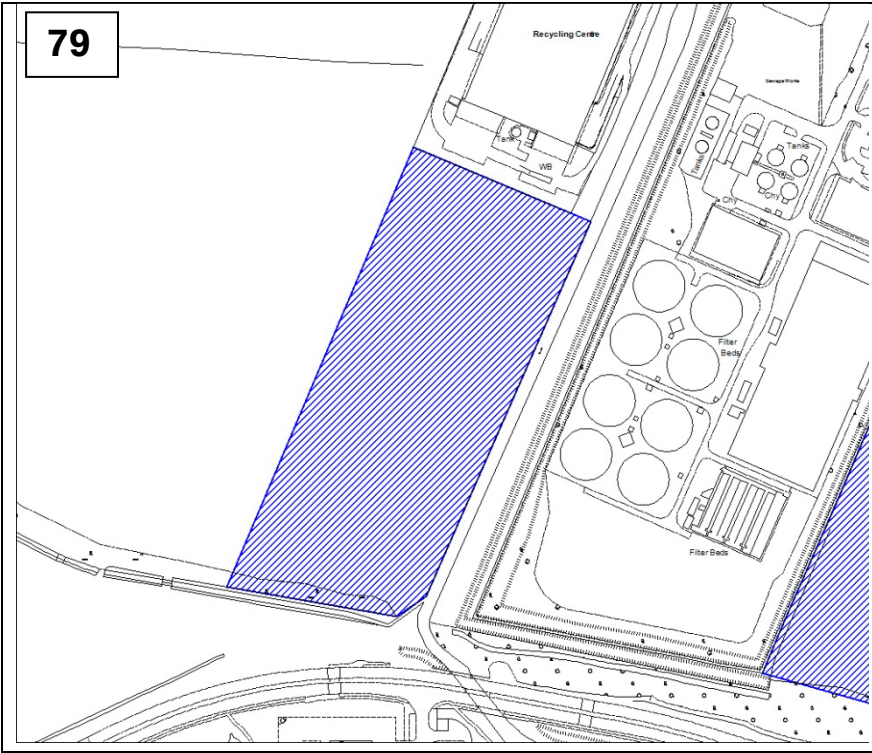












Appendix 3: Additional sites since 2017 HELAA and their suitability for accommodation for Gypsies and Travellers

Table A3.1: Additional sites identified since 2017 HELAA and their suitability for accommodation for Gypsies and Travellers

Site	HELAA ref	Local Plan allocation	Comments on suitability for Gypsies and Travellers
Aquis House, 49-51 Forbury Road	AB082	CR14t	High density town centre site with existing commercial uses on site
33 Blagrove Street	AB083	CR14u	Development would involve change of use of existing floorspace in a conservation area. Below 0.34 ha size threshold ⁴ .
Sapphire Plaza, Watlington Street	AB084	CR14z	High density town centre site with existing commercial uses on site. Below 0.34 ha size threshold.
Royal Court, Kings Road	AB085	None	Existing block of flats with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
100 Kings Road	AB095	CR14o	Development would involve change of use of existing floorspace. Below 0.34 ha size threshold.
149-150 Friar Street and 2-4 Queen Victoria Street	AB096	None	Any development would involve conversion of existing floorspace not redevelopment. Below 0.34 ha size threshold.
Former Debenhams, The Oracle	AB097	CR14g	High density town centre site with existing commercial uses on site
Warwick Arms, 77-79 Kings Road	AB098	None	Existing commercial use with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
20-22 Duke Street	AB099	CR14s	Development would involve change of use and extension of existing floorspace in a conservation area. Below 0.34 ha size threshold.
Queens Wharf, Queens Road	AB103	CR14p	Development would involve change of use of existing floorspace. Below 0.34 ha size threshold.
126 Tilehurst Road	BA023	None	Existing dwelling with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.

⁴ 0.34 ha is the threshold used for a permanent site for Gypsies and Travellers in the previous evidence (Appendix 2)

Site	HELAA ref	Local Plan allocation	Comments on suitability for Gypsies and Travellers
Curzon Club, 362 Oxford Road	BA024	None	Existing commercial use with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Part of Tesco Car Park, Portman Road	BA025	WR2w	Existing commercial car park with no indication that development for Gypsy and Traveller use likely to be achievable.
Land rear of 27-43 Blenheim Road	CA006	None	Covered by an Area TPO and not considered suitable for any residential development. Restricted access between houses means that access for caravans would be extremely difficult to achieve. Below 0.34 ha size threshold.
Hemdean House School, Hemdean Road	CA007	CA1h	Existing education use identified to continue in LPPU with no indication that development for Gypsy and Traveller use likely to be achievable.
72 Berkeley Avenue	CO013	WR3y	Development would involve change of use of existing floorspace. Below 0.34 ha size threshold.
4 Downshire Square	CO015	None	Existing dwelling in conservation area with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
45 Tilehurst Road	CO016	None	Existing dwelling with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
48 Bath Road	CO017	None	Existing serviced apartments with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Land north east of Caversham Park Road	EG010	None	Within Local Green Space and priority habitat
Trinity Hall, South Street	KA044	None	Existing student accommodation with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
85-87 Basingstoke Road	KA045	SR4i	Existing commercial use with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
11 Basingstoke Road	KA046	SR4h	Existing commercial use with no indication that development for Gypsy and Traveller use likely to be achievable.

Site	HELAA ref	Local Plan allocation	Comments on suitability for Gypsies and Travellers
Rear of 169-185 Rodway Road	KE018	None	Considered and rejected as part of previous Gypsy and Traveller site search (site 23). Below 0.34 ha size threshold.
Grovelands Baptist Church, Oxford Road	NO010	None	Would involve loss of locally-listed building. Below 0.34 ha size threshold.
Land adjacent to Thorpe House, Colliers Way	NO011	None	Partially covered by TPOs and provides residential amenity land. Below 0.34 ha size threshold.
27 Hamilton Road	PA006	None	Existing HMO in conservation area with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
70-78 Wokingham Road	PA007	None	Existing commercial use with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
51 Church Road, Earley	PA008	ER1n	Existing commercial use with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
The Willows, 2 Hexham Road	RE019	None	Permission for new homes and respite care under construction
35 Christchurch Road	RE020	None	Development would involve change of use of existing floorspace in a conservation area. Below 0.34 ha size threshold.
Land at 132-134 Bath Road	SO009	WR3u	Existing commercial use containing high risk of surface water flooding with no indication that development for Gypsy and Traveller use likely to be achievable.
62-79 Armadale Court	SO011	None	Development would involve upward extension of existing block of flats
Southcote Library, Coronation Square	SO012	WR3v	Part of Council's Local Authority New Build programme. Below 0.34 ha size threshold.
2 Norman Place	TH054	CR14v	High density town centre site with existing commercial uses on site
Reading Bridge House, George Street	TH055	CR14w	High density town centre site with existing commercial uses on site
Kennet Place, Kings Road	TH056	CR14y	Development would involve change of use of existing floorspace. Below 0.34 ha size threshold.
173-177 Kings Road	TH063	None	Within listed building setting, and part covered by TPO and close to rear of residential buildings. Below 0.34 ha size threshold.

Site	HELAA ref	Local Plan allocation	Comments on suitability for Gypsies and Travellers
Land East of Prince William Drive. Lower Elmstone Road	TI007	None	Loss of area TPO. Below 0.34 ha size threshold.
Former Sales and Marketing Suite, Drake Way	WH048	SR4k	Existing commercial use with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
19 Island Road	WH051	None	Within Flood Zone 3b and DEPZ for AWE Burghfield. Below 0.34 ha size threshold.
Site at Green Park Village, Flagstaff Road	WH053	None	Site is within DEPZ for AWE Burghfield. Below 0.34 ha size threshold.
Confidential Site 12	XX025	None	Existing dwelling with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Confidential Site 14	XX027	None	Existing town centre commercial use with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Confidential Site 15	XX028	None	Existing commercial use with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Confidential Site 16	XX029	None	Existing commercial use with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Confidential Site 17	XX030	None	Existing HMO with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Confidential Site 18	XX031	None	Within Flood Zone 3a. Below 0.34 ha size threshold.
Confidential Site 20	XX033	None	Existing hotel with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Confidential Site 21	XX034	None	Within Flood Zone 3a. Below 0.34 ha size threshold.
Confidential Site 22	XX035	None	Existing hotel with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.

Site	HELAA ref	Local Plan allocation	Comments on suitability for Gypsies and Travellers
Confidential Site 23	XX036	None	Existing dwelling with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Confidential Site 24	XX037	None	Existing dwelling with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Confidential Site 25	XX038	None	Existing dwelling with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Confidential Site 26	XX039	None	Existing dwelling with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Confidential Site 27	XX040	None	Site consists of part of a car park for blocks of flats, no indication that development for Gypsy and Traveller use likely to be achievable.
Confidential Site 28	XX041	None	Within Flood Zone 3a. Below 0.34 ha size threshold.
Confidential Site 29	XX042	None	Existing block of flats with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.
Confidential Site 30	XX045	None	Existing high density town centre residential use with no indication that development for Gypsy and Traveller use likely to be achievable. Below 0.34 ha size threshold.