

Examination of the Reading Borough Local Plan Partial Update

Reading Borough Council Hearing Statement for Matter 4: Cross-Cutting Policies

January 2026

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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: Are the cross-cutting policies justified, effective and consistent with national policy?

- 4.1 *Is Policy CC1 necessary given that the presumption in favour of sustainable development is set out in national policy?*
 - 4.1.1 Policy CC1 is not within the scope of the Partial Update, as set out in table A1.1 of the Council's Response to Initial Questions part 1 [EX002]
 - 4.1.2 This policy was inserted into a previous development plan (Sites and Detailed Policies Document, adopted 2012) at the request of an Inspector at examination stage as it was considered necessary to make a plan sound in the context of the then-new presumption in favour of sustainable development in the NPPF, and was then carried across to the Local Plan, where it was found sound. The Council has no firm views on whether this policy is necessary, but previous Inspector advice has been that it is.
- 4.2 *Is the LPPU positively prepared in respect of climate change? Having regard to Policies CC2, CC3, CC4 and other policies within the LPPU, would the LPPU be consistent with national policy and legal requirements in relation to climate change?*
 - 4.2.1 Policies CC2, CC3 and CC4 are positively prepared and form a comprehensive strategy to mitigate and adapt to climate change, ensuring the LPPU is consistent with national policy and legal requirements. Together, these policies are designed to deliver Reading's net zero target for 2030 and respond to local climate risks, including hotter, drier summers, severe heat stress, and increased flood vulnerability.
 - 4.2.2 The LPPU strengthens the adopted approach by requiring sustainable construction through a fabric-first energy hierarchy and absolute energy performance metrics (CC2 and H5), mandating adaptation measures such as passive cooling, solar shading, green roofs and sustainable drainage (CC3), and supporting renewable and low-carbon energy infrastructure through decentralised energy networks (CC4).
 - 4.2.3 This approach is fully aligned with NPPF paragraph 157, which requires the planning system to support the transition to a low-carbon future and deliver "radical reductions" in greenhouse gas emissions. It also reflects the UK's legal obligations under the Climate Change Act 2008, which necessitate a net-zero approach, and responds to the UK Sixth Carbon Budget (2033–2037), which sets stringent limits on emissions from buildings. To remain compatible with national carbon reduction targets, the Climate Change Committee (CCC) advises that local plans must support near-zero operational energy in new developments.
 - 4.2.4 These changes also reflect Reading's declaration of a Climate Emergency in 2019 and the publication of the Reading Climate Emergency Strategy (2020) [OP004] and Climate Change Adaptation Framework (2024) [OP006], which highlight the increasing severity of climate impacts and set more stringent net zero targets.

4.2.5 CC2, CC3, CC4 and other policies in the LPPU (namely, EN12, EN14, EN19 and H5) directly address the following requirement of the NPPF [OP001] in paragraph 157:

“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

The LPPU achieves this through an integrated approach by:

- Shaping places to deliver radical reductions in emissions through CC2 and H5, which require net-zero-ready development using a fabric-first energy hierarchy, absolute energy performance metrics, and on-site renewable generation.
- Minimising vulnerability and improving resilience through CC3, which mandates adaptation measures such as passive cooling, solar shading, green infrastructure, and sustainable drainage to address overheating and flood risk.
- Encouraging reuse and resource efficiency by requiring justification for demolition, diversion of 95% of construction waste from landfill, and embodied carbon assessments for major schemes (CC2).
- Supporting renewable and low-carbon energy infrastructure through CC4, which promotes decentralised energy networks and heat network connections for major developments.

4.2.6 The proposed approaches in each of the policies are based on the adopted policies which were examined and found to be justified, effective and consistent with national policy in 2019. CC3 and CC4 were subject to main modifications that were incorporated into the adopted version.

4.2.7 The Local Plan Review 2023 [LP011] assesses the need for updates and forms the main justification for the proposed approach for each policy:

Table 1: Summary of relevant changes identified during the Local Plan Review 2023 [LP011]

Policy	Paragraph of LP011	Identified need for updates during the LPPU
CC2	3.12 – 3.24	<ul style="list-style-type: none">• Recent and further forthcoming changes to the Building Regulations• Actions emerging from the Climate Emergency Strategy• Experience in appeals highlighting the need to incorporate that where requirements cannot be met, the highest standards should be achieved
CC3	3.28 – 3.35	Publication of the Climate Change Adaptation Plan and the expectation that strategies will continue to be updated and evolve over time
CC4	3.38 – 3.44	<ul style="list-style-type: none">• Publication of the Climate Emergency Strategy

		<ul style="list-style-type: none"> • Progress made on establishing heat networks within the Borough
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4.2.8 Table 1 provides an overview of the need for updates to policies CC2, CC3 and CC4 in order to be consistent with national policy and legal requirements, but these are discussed in detail in turn below.

4.3 *Is Policy CC2's approach justified and effective and is the approach, which seeks to set local energy efficiency standards, consistent with national policy and evidenced by a robust, up-to-date and locally relevant evidence base?*

4.3.1 Policy CC2 is justified and effective, and its approach to setting local energy efficiency standards is consistent with national policy and supported by a robust, up-to-date, and locally relevant evidence base. It represents an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence.

4.3.2 The policy builds on the adopted 2019 approach, which was examined and found to be justified, effective, and consistent with national policy. The updated approach reflects changes in national guidance and local priorities, ensuring continued compliance with the tests of soundness.

4.3.3 Paragraphs 3.11 – 3.26 (pp 14 – 16) of the Local Plan Review 2023 [LP011] assesses the need for updates and forms the main justification for the updated policy approach. It identifies that an update is required regarding:

- Ongoing updates to the Building Regulations and the emergence of the Future Homes Standard;
- Actions identified within the Council's Climate Change Emergency Strategy [OP004] that should be incorporated; and
- The need to state within the policy that where requirements cannot be met, the highest possible standards should be achieved.

4.3.4 The updated policy addresses these in the following manner:

- Water efficiency: Amendments to the text to clarify that all development must adopt a “fittings approach” outlined within the Building Regulations;
- Net-zero definition: Inclusion of a clear definition of net zero development achieved through the application of a fabric first energy hierarchy;
- Renewable energy: A requirement for renewable electricity generation on-site that meets demand;
- Energy performance metrics: Specific limits for site average space heating demand, site average total energy demand and a unit maximum for total energy demand;
- Energy statements: Clear requirements for metrics to be included in an applicant's Energy Statement for pre-built and as-built performance
- Flexibility: An additional paragraph to outline an “exceptional basis clause” in order to ensure that the highest possible standards are met where requirements cannot be met for technical, viability or other policy reasons;

- Circular economy: A requirement that demolition be justified and 95% of construction waste diverted from landfill;
- Embodied carbon: A requirement for an embodied carbon assessment for new-build commercial floorspace of 5000 m² or more demonstrating a score of less than 800 kg/sqm of carbon.
- Changes to the supporting text to:
 - Refer to the Council's most recent Climate Emergency Strategy and Carbon Plan;
 - Refer to the existing 2019 Sustainable Design and Construction SPD;
 - New metrics within the policy itself that stand alone from BREEAM for on-site renewables, space heating demand and total energy demand; and
 - Removal of reference to BREEAM 'very good' in paragraph 4.1.4 as this has now been superseded.

4.3.5 The following options were assessed:

- Do not update the policy – this option would rely on outdated standards such as BREEAM "Very Good" and superseded versions of Part L of the Building Regulations. These approaches fail to reflect industry best practice and do not deliver the level of carbon reduction required to meet Reading's Climate Emergency target of net zero by 2030. It would also fail to address concerns raised by applicants regarding difficulties in securing BREEAM assessors. Retaining the existing policy would not provide the necessary clarity or ambition to ensure compliance with NPPF paragraph 157, which requires plans to support radical reductions in greenhouse gas emissions.
- Omit the policy entirely and rely on updates to Part L of the Building Regulations – While this would result in some emissions reductions, the Building Regulations represent the legally allowable poorest values and rely on SAP-based calculations, which are widely recognised as contributing to the energy performance gap (where as-built performance falls short of design-stage predictions). This approach would not meet the requirements of NPPF paragraph 157 to shape places that minimise vulnerability and improve resilience. A full exploration of the limitations of relying solely on Building Regulations is outlined in the Council's Response to Initial Questions Part 2 July 2025 [EX009], paragraphs 2.1–2.7.
- Update the policy to require BREEAM "Excellent" of both major and minor non-residential development – While this would raise standards, it remains dependent on BREEAM scoring, which can be achieved relatively easily in Reading due to the urban context (e.g., proximity to services and transport). This approach does not guarantee improvements in energy performance or carbon reduction and fails to address the difficulties applicants face in accessing BREEAM assessors. It also does not align with best practice guidance advocating absolute energy metrics (LETI, UKGBC, RIBA).
- Updates to the policy to require a percentage reduction past the TER stated in the Building Regulations – Although this would improve standards beyond the minimum, it does not go far enough towards achieving net zero targets and does

not address the fundamental issue of as-built performance gaps associated with SAP methodology. This approach would not deliver the measurable outcomes required to meet Reading's Climate Emergency Strategy [OP004] or the UK's legally binding carbon budgets.

4.3.6 In terms of being compliant with national policy:

- Paragraph 157 – *“The planning system should support the transition to a low carbon future [...] it should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions [...]”* – The proposed approach directly supports this requirement by mandating net zero development, applying a fabric-first energy hierarchy, and setting absolute energy performance metrics (Space Heating Demand and Energy Use Intensity). These measures ensure significant reductions in greenhouse gas emissions and promote high levels of energy efficiency to minimise energy demand, aligning with the NPPF's emphasis on shaping sustainable places.
- Paragraph 164 – *“In determining planning applications, local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).”* – The updated policy reflects this principle by requiring applicants to demonstrate how energy efficiency has been maximised and residual energy demand met through on-site renewable generation (e.g., solar PV) and, where feasible, connection to decentralised energy networks. The inclusion of an exceptional basis clause ensures flexibility while maintaining significant weight on achieving energy efficiency and renewable integration. – the proposed approach gives significant weight to assessing whether or not applications seek energy-efficiency and meet demand through installation of renewables.

4.3.7 In terms of support through legislation:

- The Planning and Energy Act 2008 (PEA2008) empowers local authorities to set energy efficiency standards beyond Building Regulations and require renewable or low-carbon energy sources. CC2 and H5 uses these powers to mandate net zero development and on-site renewable generation.
- Town and Country Planning Act 1990 (Section 106) provides the mechanism for carbon offsetting through financial contributions where full compliance is not feasible, incorporated into CC2's exceptional basis clause.
- The UK Sixth Carbon Budget (2033–2037) sets stringent limits on emissions from buildings. The Climate Change Committee (CCC) advises that local plans must support near-zero operational energy in new developments. CC2 responds directly to these recommendations by requiring:
 - Space Heating Demand: 15–20 kWh/m²/year
 - Energy Use Intensity: 35–70 kWh/m²/year.

These targets ensure Reading contributes to national carbon reduction commitments and avoids costly retrofits.

4.3.8 The Council's Response to Initial Questions Part 2 July 2025 [EX009] directly addresses the Council's decision to depart from the 2023 Written Ministerial Statement which is considered to be inadequate for meeting net zero targets for following reasons:

- Reliance on Target Emission Rate (TER) is fundamentally flawed. TER is an emissions-based metric linked to a hypothetical "notional building" rather than the actual design. This approach fails to incentivise energy-efficient design choices such as optimal orientation, form, glazing strategies, and passive measures. It does not reflect real-world energy performance and therefore cannot guarantee meaningful reductions in energy demand.
- TER excludes significant sources of energy use. The TER methodology only accounts for regulated energy (heating, hot water, lighting), ignoring unregulated loads such as plug-in appliances, ICT equipment, and cooling systems. As a result, buildings assessed under TER may appear compliant while still consuming substantial energy in practice. This limitation makes TER-based policies unsuitable for delivering genuinely net zero development.
- Reading's proposed approach uses absolute energy performance metrics. By requiring Space Heating Demand (SHD) and Energy Use Intensity (EUI) targets, the policy ensures measurable and verifiable outcomes. These metrics provide a clear indication of actual energy use, allow meaningful comparison between buildings, and address the performance gap that persists under SAP-based assessments.
- Alignment with industry best practice and national climate objectives. The Council's approach reflects guidance from LETI's Climate Emergency Design Guide, RIBA 2030 Climate Challenge, and the UK Green Building Council Net Zero Carbon Buildings Standard. These standards are widely recognised as the most effective route to achieving net zero and are increasingly adopted by other local authorities and endorsed by Inspectors in recent examinations.
- In addition, the WMS approach would quickly become outdated due to forthcoming changes in national standards, including the Future Homes Standard and the Home Energy Model, which will replace SAP 10.2. By contrast, Reading's proposed policy based on absolute energy targets is more future-proof and adaptable to evolving standards.

4.3.9 Reading's specific environmental and urban context further supports the need for ambitious energy efficiency and climate resilience standards, including:

- Climate projections indicate that Reading will experience increasingly extreme summer temperatures. This raises the risk of overheating in homes and workplaces, making passive cooling and fabric-first design essential to maintain safe and comfortable indoor environments.
- Reading's dense urban form, combined with low tree canopy cover, exacerbates heat stress. Policies requiring high-performance building envelopes, solar shading, and green infrastructure (as set out in CC2 and CC3) are critical to mitigating these impacts.

- A significant proportion of Reading's housing stock is older and less energy efficient, increasing vulnerability to heatwaves and driving up energy demand. New development must therefore achieve exemplary standards to avoid compounding these issues and reduce future retrofit costs.
- Delivering buildings that minimise energy demand and incorporate on-site renewable generation is vital to reduce reliance on mechanical cooling and protect residents from fuel poverty during periods of high energy prices.

These local factors reinforce the need for CC2's approach, which combines absolute energy performance metrics, fabric-first principles, and adaptation measures, ensuring that new development is resilient, future-proof, and aligned with Reading's Climate Emergency Strategy and net zero target.

4.3.10 Legal advice and relevant case law confirm that it is lawful for local planning authorities to depart from the 2023 Written Ministerial Statement (WMS) where this is justified by robust evidence and viability considerations. The WMS is a material consideration but does not override statutory plan-making powers under the Planning and Energy Act 2008 and the Planning and Compulsory Purchase Act 2004. Key precedents supporting this position include:

- Tendring-Colchester Borders Garden Community AAP – Confirmed that local authorities can set higher energy efficiency standards than Building Regulations where justified by evidence and viability.
- Salt Cross Area Action Plan (AAP) – The Inspector accepted policies requiring net zero carbon development and absolute energy performance metrics, despite the WMS, on the basis of robust evidence and alignment with climate emergency declarations.
- The Winchester City Local Plan Examination endorsed local energy standards exceeding Building Regulations and using absolute energy metrics, recognising the authority's statutory duty to address climate change and the legitimacy of departing from the WMS where justified.
- Uttlesford Local Plan Examination (as post examination stage, but no main modifications to energy policies) – Supported policies requiring higher energy performance, confirming that the WMS does not preclude local authorities from adopting ambitious standards where viability and evidence are demonstrated.

4.3.11 The Council's Response to Initial Questions Part 2 (July 2025) [EX009], paragraphs 3.1–3.7, sets out detailed legal reasoning on the status of the WMS, confirming:

- The WMS is not legally binding and cannot displace the statutory duty to prepare sound local plans.
- Local authorities retain discretion to set higher standards where justified by evidence, viability, and local circumstances.
- Inspectors have consistently accepted departures from the WMS in examinations where robust justification was provided.

4.3.12 The Council is submitting further documentation by 27th January as agreed with the Inspector which further supports our proposed approach following the Inspectors

comments in paragraphs 16 – 18 of the Post Stage 1 Hearings Letter [EX030]. This evidence will also include further information to support the possible main modification to CC2 and H5 that will ensure compliance with the 2023 WMS by converting energy use and heat demand metrics to a requirement expressed as a target emissions rate (TER) [EX056].

4.3.13 The alternative TER position (which could be pursued as a main modification if the proposed approach is not considered sound) has been provided as a in a separate document [EX056]. We regret that there has not yet been time to present the modification in the same form as those in the Hearing Statements but this will be undertaken for the hearings.

4.3.14 The following representations were received at Regulation 19 stage:

- DP9 requested that the policy text clearly confirm that requirements only apply to new detailed planning applications. The Council considers this unnecessary as this is already the case.
- Friends of the Earth suggested that the policy be amended to
 - provide detail on how multi-storey buildings unable to provide enough on-site solar to meet demand should fund other renewable projects. The Council considers that providing any more detailed requirements for off-site renewables may fail to provide sufficient flexibility.
 - Emphasise insulation. The Council considers that this is already the case as the proposed approach is fabric first. The requirements as proposed would be very difficult to meet without close attention to insulation.
 - Require a lower floorspace threshold for requirements of an embodied carbon assessment. The Council does not agree. The figure proposed (5000m²) is drawn from best practice among other adopted local plans and is a common figure nationally.
 - Require strict enforcement of requirements and explore alternative uses for sites. The Council maintains that the policy gives development management officers a framework to require the highest standards without affecting viability or deliverability. Alternative uses for sites is best addressed by the HELAA [EV015 and EV016].
 - Provide specific information on how a financial contribution will be calculated. The Council considers that an overly-specific charging regime would not be future-proof given uncertainties around carbon and electricity pricing. Rather the policy states *“equivalent to at least offsetting the additional energy requirements.”* This will provide sufficient flexibility for changing technologies and costs.
 - Avoid use of BREEAM. This is noted, but BREEAM will be accepted under the exceptional basis clause in order to provide flexibility for applicants and to ensure that the highest possible standards are met where requirements cannot be fully achieved.
 - Avoid use of financial contributions as an alternative. The Council does not agree. If financial contributions are omitted as an option under the exceptional basis clause, some development could be rendered unviable.

- Ban use of perfluorinated alkyl substances (PFAS). The Council considers that prohibiting the use of specific materials is not within the scope of the Local Plan.
- The Home Builders Federation (HBF) stated that the proposed policy is not in compliance with the Written Ministerial Statement (WMS) 2023. The Council acknowledges the WMS as a material consideration but considers it inadequate for achieving net zero targets for the reasons set out in paragraphs 4.3.8–4.3.11. In summary:
 - The WMS relies on the Target Emission Rate (TER), which is based on a notional building and does not reflect real-world energy performance or incentivise fabric-first design.
 - TER excludes unregulated energy loads, meaning buildings assessed under this metric may appear compliant while still consuming significant energy in practice.
 - The Council's approach adopts absolute energy performance metrics (Space Heating Demand and Energy Use Intensity), which are measurable, verifiable, and aligned with best practice guidance from LETI, RIBA, and UKGBC.
 - This approach is supported by robust evidence, viability testing, and legal precedent confirming that local authorities can depart from the WMS where justified.
 - Therefore, the Council maintains that Policy CC2 is sound, justified, and consistent with national policy objectives under the NPPF and statutory duties to address climate change, even though it departs from the WMS.
- John Sharpe recommended establishment of a local advice service to assist property owners with regards to energy efficiency. This is considered outside of the scope of the LPPU.
- Lichfields on behalf of Mapletree Investments Ltd stated their general support but recommended the following changes:
 - Acknowledgement that for some types of development, not all criteria will be achievable. This is recognised by the Council and addressed by the proposed *“exceptional basis clause.”*
 - That the policy be reformatted to assign a number or letter to each requirement. It is the Council's position that it is unclear what additional benefit alternative formatting would bring.
 - That the word “feasibility” be added to the exceptional basis clause. Again, it is unclear what additional benefit this change would bring.
 - That the percentage requirement for diversion from landfill be reduced from 95% to 70%. The Council considers the figure of 95% to be most appropriate as this is drawn from the adopted policy of the Greater London Authority and is recognised by the UK Green Building Council. A change is proposed to include a footnote to this effect.

- The policy should clarify that a presumption against demolition will not apply to sites CR14t and CR14u. A change is proposed to state that this requirement will not apply to sites allocated within the Plan.
- Stantec on behalf of SEGRO stated the following –
 - That the Council has not provided enough evidence to go beyond current or planned building regulations according to the criteria set within the 2023 WMS. The Council maintains that the 2023 WMS is inadequate as stated above in paragraphs 4.3.8 – 4.3.11. Moreover, The Whole Plan Assessment of Viability [EV004] considers the costs of this policy and has determined that it does not affect deliverability. In cases where requirements would render development unviable, the exceptional basis clause intends to provide enough flexibility to allow development to proceed while meeting the highest achievable sustainability standards. Furthermore, the adoption of absolute energy performance metrics (Space Heating Demand and Energy Use Intensity), will provide measurable and verifiable outcomes, align with best practice guidance from LETI, RIBA, and UKGBC and similar policies have been found justified and sound by other LPAs.
 - That the policy be revised to state that net-zero development is “aspirational” not required. The Council considers that an “aspirational” net-zero policy would result in many more dwellings that continue to contribute to carbon emissions within the Borough and create the need for costly retrofit in the future.
 - That the policy omit a requirement for a water efficiency “fittings approach” as outlined in the Building Regulations. The Council maintains that this approach is necessary and is clearly outlined in the Building Regulations as an optional technical standard for water-stressed areas (which includes Reading.) The water efficiency elements of this policy, as well as those within H5, have been drafted with significant input from Thames Water to reduce water demand.
 - SEGRO supports the requirement within the exceptional basis clause for BREEAM “excellent.”
 - That the word “realistic” be included within the exceptional basis clause i.e. “the highest realistic standards are required.” The Council is unclear as to what additional benefit this would bring or how officers would measure whether or not a standard is “realistic.”
- Thames Water expressed support for the proposed approach to water efficiency requirements.
- The University of Reading submitted the following comments:
 - Expression of support for water efficiency requirements.
 - That CC2 and H5 be combined into a single policy for clarity. The Council maintains that CC2 and H5 address different issues. CC2 is intended to provide sustainability guidance for all development, while H5 provides additional requirements for housing.

- That the policy could be interpreted broadly to apply to changes of use, as well as new non-residential development. A main modification is proposed to address this and is discussed in detail below in questions 4.5. In cases where the criteria cannot be achieved, the highest possible standards will be sought.
- Expression of support for the exceptional basis clause.
- That further detail be provided for specific building typologies and uses and that the policy only apply to wholly new buildings. Firstly, the Council considers that the guidance provided (such as the LETI Climate Emergency Design Guide) does contain information specific to building typologies and uses. Omitting these from the policy itself increases flexibility for applicants and allows each application to be considered on a case-by-case basis. It also helps to future-proof the policy in light of emerging technologies. A main modification is proposed to address this second point and is discussed below under question 4.5.
- That financial contributions be linked to residual carbon emissions, rather than energy demand. The Council does not agree. The proposed approach represents best practice and is the adopted policy of many other local authorities due to the ease of calculation when compared with residual emissions.
- That the requirement for a justification for demolition be expanded to outline more specific guidance about what would be considered a satisfactory justification, including prescribed assessment methodology. The Council considers that this level of detail is not necessary but has proposed a change to include reference to further technical guidance as stated in paragraph 4.3.15 below.
- Expression of support for the embodied carbon requirements and reference to the RICS Professional Standard.
- Stantec on behalf of Aviva Life and Pensions UK Ltd does not support the removal of BREEAM standards and the requirement to achieve net-zero development citing additional burden on the viability of schemes and inconsistency with Government policy. They also state that the policy is too long and should be redrafted for clarity. Firstly, the Council would like to point out that the costs of these requirements have been assessed within the Whole Plan Assessment of Viability [EV004] and determined that the costs associated will not impact deliverability of sites. In cases where requirements would affect viability, applicants may pursue options under the exceptional basis clause. The reasons for the Council's exceeding the Building Regulations are outlined above in above in paragraphs 4.3.8 – 4.3.11. Finally, the policy has been drafted to be as concise as possible, but the technical nature of this issue requires that detailed guidance be provided.
- Turley on behalf of CBRE Investment Management also cited negative effects on viability and suggested that references to unregulated energy be omitted. As stated above, the Council maintains that viability is addressed within the Whole Plan Assessment of Viability [EV004]. In cases where requirements would affect

viability, applicants may pursue options under the exceptional basis clause. With regard to unregulated emissions, the Council does not agree. Because unregulated emissions are such a significant source of emissions they must be addressed. Therefore, best practice guidance proposes that unregulated emissions are accounted for using reasonable estimates.

4.3.15 The following modifications are proposed and included in the table in Appendix 1:

- Addition of a footnote to refer to the LETI Climate Emergency Design guide in order to provide additional technical guidance for applicants;
- Addition of a footnote to refer to the CIBSE TM54: Evaluating Operational Energy Use at Design Stage in order to provide additional technical guidance for applicants;
- Addition of a footnote to clarify that any sites specifically allocated within the Local Plan are not subject to the requirement for justification for demolition; and
- Addition of a footnote to refer to the London Circular Economy Statement to provide further technical guidance for applicants.

4.3.16 A further main modification is proposed to remove the application of these requirements to the redevelopment and refurbishment of existing building stock. This is discussed in detail below in question 4.5.

4.4 *Is Policy CC2 clearly written and unambiguous? Is it clear to both the decision-maker and the applicant what will be required of them in meeting Policy CC2 for different types of development? When read in tandem with Policy H5 on energy efficiency for residential development, is it clear how both policies will work together?*

4.4.1 Yes, Policy CC2 is clearly written and unambiguous. It explicitly states that it applies to “proposals for new development” generally, ensuring clarity for both applicants and decision-makers. Paragraph 4.1.4 of the LPPU reinforces this by confirming that “additional expectations for housing are set out in Policy H5.” This makes the relationship between the two policies explicit:

- CC2 sets out overarching principles for sustainable design and construction applicable to all development types.
- H5 provides additional, residential-specific requirements, including detailed energy performance metrics, water neutrality, and accessibility standards.

Together, these policies form a coherent framework that is easy to interpret and apply. CC2 operates as a cross-cutting strategic policy, ensuring consistency across all sectors, while H5 translates these principles into tailored standards for housing.

4.4.2 This approach where CC2 addresses sustainable design generally and H5 adds residential-specific detail, reflects the structure of the adopted Local Plan [PP005]. It has been successfully implemented in Reading since 2019, with applicants and planning officers applying these policies effectively in decision-making.

4.4.3 The proposed structure also aligns with best practice nationally. Many adopted Local Plans use this model, including Central Lincolnshire¹ and Cornwall², where overarching sustainability policies are complemented by housing-specific standards. This consistency across authorities demonstrates that the approach is well understood and workable in practice.

4.5 *What is the evidential basis for applying CC2 to the redevelopment and refurbishment of existing building stock?*

4.5.1 Although the Council would like to highlight the importance of reducing emissions and improving energy efficiency across the Borough, including in applications pertaining to redevelopment and refurbishment, we acknowledge that application of these standards presents significant challenges for redevelopment and refurbishment of existing building stock. Moreover, given the wide variation in the condition of existing buildings coming forward for redevelopment it is very difficult to test impacts on viability accurately.

4.5.2 Therefore, the Council would like to propose a main modification to clarify that the requirements of CC2 will apply to new-build development only and remove reference to conversions to residential. A further paragraph is proposed to be added to the policy to state that major proposals relating to existing non-residential buildings or conversions to residential should “*demonstrate that the energy hierarchy has been followed as far as practicable and viable.*” These main modifications are included in Appendix 1.

4.6 *Would Policy CC2’s requirements apply to reserved matters applications where the outline or hybrid application was approved prior to the LPPU being adopted?*

4.6.1 No. The Council would not expect reserved matters applications linked to an outline or hybrid approval granted prior to adoption of the Local Plan Partial Update (LPPU) to be subject to CC2 requirements. This position is based on the following:

- Sustainability requirements are typically secured at the outline stage through conditions or obligations. Introducing new CC2 standards at reserved matters would effectively alter the parameters of an approved scheme, which is not permissible under planning law and would undermine certainty for applicants.
- Meeting CC2 requirements, such as achieving net-zero operational energy and applying the energy hierarchy requires consideration at the earliest design stages. Key factors like building orientation, thermal mass, and structural design cannot be retrofitted at reserved matters without fundamentally changing the approved scheme.
- Applying CC2 retrospectively would create significant viability and delivery risks for schemes already in progress. The Council recognises the importance of reducing carbon emissions but must balance this with procedural fairness and the principle of legitimate expectation for applicants operating under previously approved policy frameworks.

¹ <https://www.n-kesteven.gov.uk/sites/default/files/2023-04/Local%20Plan%20for%20adoption%20Approved%20by%20Committee.pdf>

² <https://www.cornwall.gov.uk/media/uxgjk4jn/climate-emergency-dpd.pdf>

While CC2 will not be mandatory for these applications, the Council would strongly encourage applicants to incorporate sustainability enhancements where feasible.

4.7 *Is Policy CC3 justified and effective, having regard to national policy?*

4.7.1 Policy CC3 is justified in that it is an appropriate strategy aimed at directly addressing the effects of climate change most pertinent to Reading. It takes into account reasonable alternatives and is based on robust and proportionate evidence. It is consistent with national policy.

4.7.2 The policy is based on the adopted policy which was examined and found to be justified, effective and consistent with national policy in 2019, subject to a main modification that was incorporated in the adopted version.

4.7.3 Paragraphs 3.27 – 3.36 (pp. 16 and 17) of the Local Plan Review 2023 [LP011] assesses the need for updates and forms the main justification for the proposed approach. It identifies that an update is required to take account of the publication of further local guidance since the adoption of the existing Local Plan, namely the Reading Climate Change Emergency Strategy [OP004] and the Reading Climate Change Adaptation Plan [OP006]. It identifies that the policy should be updated to acknowledge the following:

- The Reading Climate Emergency Strategy 2020 [OP004];
- The Sustainable Design and Construction SPD 2019 [PP012];
- The Reading Climate Change Adaptation Plan 2019 [OP006];
- That local strategies will continue to evolve; and
- That greater weight should be given to climate change mitigation given increasing frequency and severity of local effects.

4.7.4 The updated policy addresses these issues in the following manner:

- The supporting text refers to the three documents identified above as guidance for applicants.
- The policy is lightly restructured around the three most pertinent effects identified for Reading by the Emergency Strategy [OP004] and in paragraph 6.3.1 of the Council's Adaptation Framework [OP006], namely overheating, flooding and extreme storms.
- Changes to language around ventilation, reducing exposure and resilience in line with other Council strategies and recent changes to the Building Regulations, for example, Part O on overheating.
- Addition of specific considerations for new and existing buildings in line with the Sustainable Design and Construction SPD [PP012] including solar shading, thermal mass, heating and ventilation, the colour of materials, green and brown roofs and walls, tree planting and soft surfaces.
- Strengthened language around the need to minimise surface water runoff to prevent flooding in line with national requirements for SuDS and flood mitigation.

4.7.5 Given the existing approach that is already in place, the only alternative option assessed was to not update the policy. This was rejected due to the fact that it does

not refer to the most up-to-date local strategies and does not afford appropriate weight to climate change mitigation measures given the increased emphasis in national policy since 2019 and the urgency of the Climate Emergency.

4.7.6 The policy complies with the following statements within the NPPF:

- Paragraph 20: “*Strategic policies should [...] make provision for [...] planning measures to address climate change mitigation and adaptation.*” – this policy is wholly specific to climate change adaptation.
- Paragraph 136: “*Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.*” – this policy outlines the importance of trees for cooling the urban environment.
- Paragraph 158 – “*Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures.*” – this policy takes a proactive approach in addressing the three most relevant climate threats to Reading, namely overheating, flooding and extreme storms.
- Paragraph 159 – “*New development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems.*” – this policy requires that surface water runoff is minimised to prevent increased vulnerability to localised flooding.

4.7.7 Representations received at Regulation 19 stage were largely supportive, but some minor changes were made before submission to use specific terms provided by the Environment Agency and to correct a typo. Some parties suggested further inclusion of language regarding specific technologies or requested further detail, but the Council believes this detail is best addressed by other policies within the plan (such as EN18) and that reference to specific technology does not serve to future-proof the policy.

4.7.8 A number of other parties also made representations stating that the policy is not achievable on many sites given specific characteristics or development types or that climate change mitigation may negatively impact viability. The Council maintains that this is not the case and is addressed by language in the policy itself stating that measures shall be incorporated “*unless it can be demonstrated that requirements are not suitable, feasible or viable.*”

4.7.9 Main modifications included in Appendix 1 are proposed to provide specific links to references in the footnotes and to align language with the SFRA. These were also included in the List of Changes to the Submission Draft [LP002].

4.8 *Is Policy CC4 justified and effective? Is Combined Heat and Power (CHP) considered to represent a suitable decentralised energy system in terms of carbon emissions?*

4.8.1 Policy CC4 is justified in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on robust and proportionate evidence. Moreover, it is consistent with national policy.

4.8.2 The policy is based on the adopted policy which was examined and found to be justified, effective and consistent with national policy in 2019, subject to a main modification that was incorporated in the adopted version.

4.8.3 Paragraphs 3.37 – 3.45 (pp. 17 – 18) of the Local Plan Review 2023 [LP011] outlines the need for updates and forms the main justification for the updated approach. It identifies that an update is required regarding the publication of the Reading Climate Change Emergency Strategy [OP004] which identifies establishing heat networks as a major priority and to account for progress made locally on establishing district heating networks. Moreover, the Government has since published guidance to refer to Heat Network Zoning across the country and the existing policy does not align with this language.

4.8.4 The updated policy addresses these issues in the following manner:

- Text to refer to the Climate Emergency Strategy [OP004];
- Text to strengthen language (i.e. “shall” to “must, unless not suitable, feasible or viable”);
- Text to refer to Government guidance on Heat Network Zoning; and
- Deletion of supporting text that is now considered out-of-date.

4.8.5 The only alternative option assessed was to not update the policy, given the existing approach is already in place. This was rejected as it does not refer to the most up-to-date local strategies in place and does not refer to Government guidance regarding Heat Network Zoning.

4.8.6 This policy complies with the following NPPF statement:

- Paragraph 160 – *“To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts); b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.”* – the policy creates a framework for the Borough to identify suitable opportunities for heat networks and to secure their development.

4.8.7 Representations received at Regulation 19 stage were largely supportive, with the following caveats:

- Historic England recommended inclusion on consideration of the potential of impacts to the settings of historic assets. A main modification is proposed to address this and is listed in the Appendix. This was agreed within the SOCG with Historic England [EX014].
- The University of Reading and Friends of the Earth stated that reference to CHP should be removed as this is no longer considered to be a suitable technology given it relies on fossil fuels. A series of changes to the text were proposed as a result and are detailed in the List of Changes to the Submission Draft [LP002]. These changes remove all reference to CHP as the Council agrees that CHP that relies on fossil fuels does not represent a suitable form of decentralised energy given carbon emissions and possible localised effects of fossil fuel combustion.
- Stantec on behalf of Aviva Life and Pensions UK Ltd made a representation against CC4 and cited “significant additional burden on the viability of schemes.” The Council does not agree as the policy clearly states that decentralised energy schemes must be included “unless it can be demonstrated that requirements are no suitable, feasible or viable.”

4.8.8 Due to the removal of all references to CHP as described above, various other changes are proposed to clarify definitions and to align the terminology with national policy. These were initially in the List of Changes to the Submission Draft [LP002] and, as that document is not being considered, are included in Appendix 1 here.

4.8.9 Furthermore, the Council has since undertaken further work on establishing local heat networks. A change was also proposed to update the explanatory text to this effect in LP002 and is now also included in Appendix 1.

4.9 *Is Policy CC7, justified, effective and consistent with national policy? Is Policy CC7 clear, unambiguous, internally consistent and avoids undue repetition?*

4.9.1 Policy CC7 is justified in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on robust and proportionate evidence. It is also consistent with national policy.

4.9.2 The policy is based on the adopted policy which was examined and found to be justified, effective and consistent with national policy in 2019. No main modifications were made during examination.

4.9.3 Paragraphs 3.62 – 3.73 (pp. 20 – 22) of the Local Plan Review 2023 [LP011] assesses the need for updates and forms the main justification for the updated policy approach. It identifies that an update is required regarding:

- The need to link the policy to emerging guidance within the NPPF and legislation requiring future production of local design code(s);
- Changes in national policy including the publication of the National Design Guide and the National Model Design Code; and
- Changes in local policy such as new Council strategies for neurodivergent users of the built environment and a new Public Realm Strategy.

4.9.3 The updated policy addresses these in the following manner:

- Significant changes to the text of the policy to reflect the three overarching aims and ten characteristics outlined in the National Design Guide and National Model Design Code;
- Changes to the supporting text to refer to updates to Section 12 of the NPPF “Achieving well-designed places”;
- Reference within the supporting text stating that applications within the town centre should refer to the emerging Town Centre Public Realm Strategy (which has been consulted upon but not yet adopted – adoption is expected in June);
- Reference within the supporting text to explain forthcoming requirements for the publication of local design codes.

4.9.4 It is considered that the broad and comprehensive range of considerations covered by the National Model Design Code and National Design Guide effectively address the needs of all built environment users, including those with additional needs such as autism, neurodivergence, visual impairment, limited mobility, etc.

4.9.5 Although the policy contains ten specific considerations for design and a detailed explanation of the elements within each, it is not considered to be unduly repetitive as it is directly based on the language within the National Design Guide³ and aims to be as concise as possible without omitting any of the ten characteristics. CR2: Design in Central Reading has also been drafted with this in mind and aims to outline only those characteristics specific to the town centre, whereas Policy CC7 should be applied throughout the Borough.

4.9.6 The only alternative option assessed was to not update the policy given the existing approach is already in place. This was rejected due to the fact that it does not refer to the most up-to-date NPPF and national planning guidance with regard to design.

4.9.7 In terms of being compliant with national policy, the policy complies with the following NPPF statements:

- Paragraph 132 – *“Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations and are grounded in an understanding and evaluation of each area’s defining characteristics.”* – this policy sets out clear design expectations and is future-proofed to allow for the development of local design code(s) reflecting more specific local aspirations.
- Paragraph 135 – *“Planning policies and decisions should ensure that developments:*
 - a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

³https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf

- 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);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.” – this policy addresses each of these design priorities.

4.9.8 Nine representations were made with regard to this policy during Regulation 19 stage. There are summarised in detail on pp. 57 – 60 of the Statement of Consultation on the Pre-Submission Draft LPPU [PO006]. In summary:

- Sport England stated that the reference to Active Design should not have been removed. The Council would like to re-iterate that this change was made in order to delete reference to an out-of-date website but that the significant expansion of the policy includes many elements of Active Design.
- DP9 Ltd on behalf of SH Reading Master LLP and the Woodland Trust expressed their support of the policy as proposed.
- Friends of the Earth and John Sharpe requested that specific reference be made to bicycles, bicycle trailers and management of new planting. The Council believes that this is unnecessary as these elements are more effectively addressed by policies TR4, EN12 and EN14.
- Stantec on behalf of Segro and Stantec on behalf of Aviva Life & Pensions UK Ltd raised concerns that requirements may affect viability or deliverability. The Council maintains that the policy is directly related to requirements in the NPPF and national legislation and guidance and that each site will be considered on a case-by-case basis. Moreover, the requirement for applicants who are unable to make on-site provision to make a financial contribution provides significant flexibility.
- The University of Reading opposed inclusion of “*Context: enhances the surroundings [...]*” citing that this is unrealistic and may not be possible whilst meeting the needs of the development. The Council does not agree. This language is drawn directly from the National Design Guide and the Council will consider each application on a case-by-case basis. As stated above, in cases where the requirements are not able to be met on-site, the applicant may be required to make a financial contribution. This will help to ensure flexibility at application stage.

- The University of Reading also proposed changes to bullet point five citing that it is not practicable or possible for development to enhance nature and that the term “*nature*” is ambiguous. Moreover, they stated that the retention of existing trees and aim to establish new trees in too onerous and that this is in conflict with EN14. The Council does not agree. The use of the term “*nature*” and the requirement to enhance nature is directly drawn from the National Design Guide. The use of “*should retain existing trees*” rather than “*must*” is intentional in order to allow each case to be considered on its own merits. The consideration of trees is included within the proposed approach in order to align with national guidance and to cover the full breadth of design considerations, but trees and biodiversity are best addressed in detail by EN12 and EN14.
- Thames Valley Police requested changes to emphasise the importance of designing for safety and reducing the fear of crime and called for more specific reference to the NPPF with regard to these issues. The Council agreed to make two changes to the policy itself based on these comments as described in the List of Changes to the Submission Draft [LP002] and these are now included in Appendix 1, but no change is proposed to include further reference to the NPPF within the text as it is unclear what additional benefit this would bring.

4.9.9 Overall, the approach pursued by the Council aims to align the policy more closely with the specific elements of the National Design Guide and to distil the requirements of national guidance into 10 concise points for applicants to consider. Although it briefly touches on elements of other policies within the plan (such as transport or trees) this was considered necessary in order to align a single design policy with national guidance and to provide internal consistency. In order to avoid repetition within the Plan, CR2: Design in Central Reading aims to address only those elements which are specific to the town centre.

4.10 *How would a scheme be measured as having made “a positive contribution within the following characteristics” as per the opening paragraph of Policy CC7? Would every scheme be expected to meet all Policy CC7’s parameters?*

4.10.1 Paragraph 4.1.35 of the supporting text states:

“There will be a strong expectation that design issues will be dealt with at pre-application stage. For major proposals where there are significant design implications, planning officers will engage with design review bodies as part of the decision-making process. The approach to design should not be a ‘tick-box’ exercise but rather should employ an overarching aesthetic approach where all elements listed in the policy combine to create an attractive and well-functioning place. Supplementary Planning Documents may be prepared for elements of design where necessary.”

4.10.2 Therefore, the policy is intended to encourage engagement on design matters from the earliest stages. The characteristics in the policy are intended to outline an overview in line with national guidance of the elements that should be considered by applicants and planning officers. The NPPF states at paragraph 139 that “*development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.*”

4.10.3 A scheme would be measured as having made a positive contribution within the characteristics stated if accompanied by a detailed design and access statement which sufficiently addresses each of the ten characteristics. This may include justification as to why a particular element of design is not achievable on-site. In these cases, the policy states:

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

Planning conditions may also be used to ensure that good design is not lost or eroded through further works not requiring planning permission and to ensure that appropriate materials are used.

4.11 Is Policy CC9 justified and effective?

4.11.1 Policy CC9 is justified in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on robust and proportionate evidence.

4.11.2 This policy is based on the adopted policy which was examined and found to be justified, effective and consistent with national policy in 2019, subject to a main modification that was incorporated in the adopted version.

4.11.3 Paragraphs 3.82 – 3.97 (pp. 23 – 25) of the Local Plan Review 2023 [LP011] assesses the need for updates, and forms the main justification for the updated policy approach. It identifies that an update is required regarding:

- Changes in legislation with regard to pooling restrictions and Section 106 agreements;
- The new role of Infrastructure Funding Statements in setting spend priorities;
- The forthcoming Infrastructure Levy (details of which were anticipated at the time to emerge but this is no longer applicable as it has not been carried forward by Government);
- The lack of reference to digital infrastructure.

4.11.4 Following early stakeholder discussions with the local NHS Integrated Care Board in autumn 2023 and comments received at Regulation 18 stage, a further update was identified to increase the priority level for provision of healthcare. This is due to the growing numbers of residents seeking registration at GP surgeries and to account for population growth within the town centre. The Council agrees that given the strategic importance of health facilities, delivery should be of the highest priority alongside transport, open space, education and economic development infrastructure.

4.11.5 The updated policy addresses these in the following manner:

- Increasing the priority level of delivering healthcare infrastructure from "*high priority*" to "*highest priority*".
- Providing specific types of cultural infrastructure for clarity, including theatres, museums, libraries, archives and heritage sites.
- Addition of the following supporting text:

- Paragraph 4.1.48 describing requirements for the publication of Infrastructure Funding Statements.
- Paragraph 4.1.48 (duplicate numbering due to typo, to be corrected) referring applicants to the existing SPD on Section 106 and CIL for guidance regarding Employment and Skills Plans.
- Deletion of the following supporting text in paragraph 4.1.49 which is no longer accurate: *“The CIL Regulations place limits upon pooling Section 106 payments, but there is still potential to pool contributions where there is a clear group of related developments.”*

4.11.6 The only alternative option assessed was to not update the policy, given the existing approach is already in place. This was rejected due to the fact that it would fail to give appropriate increased priority to healthcare provision and would contain reference to out-of-date requirements in legislation. The detail provided in national policy with regard to infrastructure contributions means that genuine alternative options are very limited.

4.11.7 The Whole Plan Assessment of Viability [EV004] included CIL contributions when assessing the viability of a range of development scenarios and found that CIL rates in combination with the proposed policies in the Local Plan will not impede development in Reading. The Community Infrastructure Levy Charging Schedule [PP007] provides further support for Policy CC9. The Council will only seek Section 106 contributions that *“are necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development”* as outlined in paragraph 57 of the 2023 NPPF and the CIL regulations.

4.11.8 In terms of being compliant with national policy, this is primarily addressed by the supporting text of the policy itself. In addition, the policy also complies with the following NPPF statements:

- Paragraph 20 – *“Strategic policies should [...] make sufficient provision for: [...]*
- b) *infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- c) *community facilities (such as health education and cultural infrastructure); and*
- d) *conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”* – the policy directly addresses and prioritises the areas of infrastructure listed here.
- Paragraph 34 – *“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.”* – the policy sets out the expectation of direct provision of infrastructure or financial contributions and clearly outlines the types of infrastructure needed and

assigns a priority to each. Paragraph 4.1.51 of the supporting text of the policy states that “*requirements must consider their effects on the viability of development.*”

4.11.9 Four representations were received on this policy at Regulation 19 stage. Of these, three were in support. The Environment Agency requested that more information about fluvial flood risk infrastructure be included within the policy. The Council considers that this is best addressed by policy EN18.

4.11.10 Although the Local Plan Review 2023 [LP011] included a proposal to make reference to digital infrastructure as described above in 4.11.3, this was omitted by error of the Council in the Regulation 18 and Regulation 19 consultation documents. Therefore, a modification is proposed in the Appendix to include “*digital infrastructure*” within the bullet point of the policy that covers economic development.

4.12 *Does the Council’s Draft Infrastructure Delivery Plan (May 2025) [EV005] clearly set out the infrastructure required to support growth and the delivery of development proposed in the LPPU?*

4.12.1 Yes, the Infrastructure Delivery Plan (IDP) clearly sets out the specific types of physical, green and community infrastructure required to support growth throughout the plan period and to enable the delivery of the level of development identified. It identifies the full range of infrastructure types including transport, education, health, utilities, green infrastructure, and community facilities, etc. and explains the processes used to assess these needs. The document sets out both borough-wide requirements and specific area priorities, ensuring that infrastructure requirements are clearly outlined in a way that align with the spatial strategy and anticipated phasing of development to 2041.

4.12.2 The IDP has been developed through on-going collaboration with key internal and external stakeholders throughout the LPPU process. It is intended to inform CIL and S106 decisions throughout the plan period. The IDP is intended to be a living document, meaning it will be updated regularly to respond to changes in needs, funding and progress made on the ground. Within the IDP Schedule in Section 6 [EV005] each scheme is accompanied by an associated location, type, explanation of need, specific requirements, capital costs and funding, timescales and lead delivery agency (all where known).

4.12.3 It is important to note that due to the nature of development within the Borough, the schemes listed within the IDP primarily address the cumulative effects of development rather than specific schemes. This is because the majority of development will consist of development of existing relatively small brownfield sites including intensification of use. These schemes do not usually necessitate the requirement of specific or individual infrastructure provision, although some larger sites may require specific infrastructure.

4.12.4 The following comments on the IDP were received during Regulation 19 stage:

- Savills on behalf of Sorbon Estates stated that the IDP should refer specifically to the need for a Sunday bus service serving site SR4g. The Council considers that

specific bus services are not within the scope of the IDP, but the IDP does recognise the importance of bus connectivity generally.

- The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB ICB) welcomed inclusion of primary care provision within the IDP but recommended that a separate section be created to distinguish new primary health provision from reconfiguration of existing primary health sites. The Council is not proposing this change as it is unclear what additional benefit this would bring. The BOB ICB also expressed concern that no CIL funding has been allocated recently to primary care. No change is proposed to the IDP itself as this is not within its scope, but the Council would comment generally that it has requested on a number of occasions that specific proposals are brought by the ICB that could benefit from CIL funding, but so far none have been forthcoming. Engagement on this matter continues.
- The Environment Agency expressed concern that the IDP identifies a number of areas including parts of west and south Reading where Thames Water has identified capacity issues with water and wastewater and state that detailed modelling is required to determine if local infrastructure upgrades are required. Although the Council certainly shares and recognises these concerns, it is unclear what specific change to the IDP would be necessary. The Council is continuing to engage with Thames Water to ensure that infrastructure planning urgently addresses the need for capacity, particularly at the Reading Sewerage Treatment Works. The comments by Thames Water generally highlight areas where upgrades would need to be planned in through liaison between the developer and Thames Water which, if discussions do not commence in a timely manner, may lead to delays in development coming forward, but are not intended to identify wider strategic concerns that would be reflected in the IDP.

4.13 *Having regard to the list of priority infrastructure in Policy CC9, where does affordable housing fall within the prioritisation of infrastructure? What is the evidential basis for the prioritisation of particular forms of infrastructure?*

4.13.1 Affordable housing is not considered infrastructure within Policy CC9 and is not therefore covered here, being instead sought under policy H3. However, if it were considered infrastructure, it would be among the highest priorities. Delivery of affordable homes is specifically mentioned in the Council Plan 2025-28 as part of meeting overall housing targets, alongside the building of new Council homes to help to meet needs. Ensuring that developments deliver policy-compliant affordable housing wherever possible is a key issue for members when decisions are made at Planning Applications Committee. In practice this means considerable scrutiny through the development management process on whether policy-compliant affordable housing can be delivered and if not whether other demands on the Section 106 process affect the level of affordable housing that can be delivered. How these competing priorities are balanced needs to be addressed on a case-by-case basis because those other priorities are typically identified to mitigate the specific impacts of a development, rather than being a tariff-based approach (which is now largely covered by CIL).

4.13.2 The types of infrastructure listed are aligned with national guidance and based on need and deliverability. Infrastructure types have been prioritised based on on-going discussions with key stakeholders to identify existing provision, areas of deficit and the broader priorities of the Council⁴. Infrastructure providers and key stakeholders have shared up-to-date evidence regarding existing gaps in provision and any plans to address these gaps, as well as information about timescales and funding. The priorities listed were selected and ordered to deliver the greatest public benefit and aims to focus on schemes which are realistic, deliverable and relevant to strategic growth. It is considered that an expansion of this list may lead to further competition for limited funding.

4.13.3 The prioritisation of particular forms of infrastructure reflects the existing approach (with the exception of the proposed increased priority for healthcare). This approach has been implemented effectively under the existing Local Plan and is well-established, having been found sound in 2019 as well as prior to the existing Local Plan.

4.14 *Is the approach in Policy CC10 to health impact assessment justified, effective, and consistent with national policy?*

4.14.1 Policy CC10 is justified in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on robust and proportionate evidence.

4.14.2 This policy is a wholly new policy proposed to help deliver one of the overarching objectives of the Plan to promote healthy and inclusive communities. The proposed approach introduces a new requirement for Health Impact Assessment (HIA) of major applications or applications for accommodation for vulnerable people due to the specific sensitivities and needs of these populations. It provides clarity on when and how an HIA should be undertaken to help embed health considerations into planning decisions without imposing a burden on applicants, referencing guidance which uses a tiered approach that is tailored to the scale of development. Early use of screening tools by applicants will help to ensure that HIA is proportionate.

4.14.3 The new policy was drafted for consultation before Regulation 19 stage following comments received by the BOB ICB at Regulation 18 stage. The ICB cited recommendations from Public Health England that local planning authorities use HIA in the planning process. By addressing health impacts from the earliest stage of design, development can help to reduce the burden on healthcare provision within the Borough by encouraging physical activity and wellbeing. The proposed policy relies on Public Health England's guide to Health Impact Assessment in Spatial Planning⁵. The policy text mirrors best practice among other local authorities with adopted HIA policies, such as Waltham Forest⁶ and Tower Hamlets⁷.

4.14.5 This policy is a key part of the Council's strategy to meet the requirements of paragraph 92 of the NPPF which states "*planning policies should aim to achieve*

⁴ Council Plan (2025 – 2028) <https://www.reading.gov.uk/the-council-and-democracy/council-strategies-plans-and-policies/corporate-plan/council-plan-2025-to-2028/>

⁵ [Health Impact Assessment in spatial planning - GOV.UK](#)

⁶ [Health Impact Assessments | London Borough of Waltham Forest](#)

⁷ [Health Impact Assessment](#)

healthy, inclusive and safe places which [...] enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs."

4.14.5 The only alternative option tested reflects the existing position of having no HIA policy in place. This option was rejected as it would fail to give the needed emphasis to health within the Plan and would likely lead to poor design outcomes that discourage physical activity, worsen local health inequalities and increase the burden of chronic disease on healthcare provision.

4.14.6 The following representations were received at Regulation 19 stage:

- The University of Reading stated that requirements for mitigating the negative health effects of a development identified during HIA is overly restrictive and proposed a change to the text to remove the requirement to mitigate negative health effects and add language stating "*where applicable*." The Council does not agree. Due to the significant strain being placed on the NHS by chronic disease (partially as a result of poor built environments), considering health impacts is of high importance. Flexibility is provided within the policy by specifying that HIA should be "*proportionate*."
- DP9 Ltd on behalf of SH Reading Master LLP requested that CC10 be amended to explicitly state that HIA requirements will not apply to reserved matters applications. The Council does not consider this change to be necessary. It is already the case that applications that have already been approved will not be subject to the requirements of this new policy.
- John Wilkins raised a comment citing a lack of amenity space and car parking associated with blocks of flats in the town centre. The Council does not consider this comment to be relevant to CC10.
- The Royal Borough of Windsor and Maidenhead expressed its support of the use of HIA.
- AWE Plc on behalf of the MOD suggested that the following additional language within CC10 is necessary for soundness: "*Any development proposals within the Detailed Emergency Planning Zone for AWE Burghfield and AWE Aldermaston with the potential to increase population within the DEPZ must be accompanied by an HIA which fully complies with policy OU2.*" In order to avoid unnecessary repetition and cross-referencing within the Plan, the Council does not consider this change to be necessary. Moreover, OU2 applies to all development.
- Churchill Living stated that the policy should not apply to older persons housing. The Council does not agree. Due to the particular needs of older residents and possible vulnerabilities, a full picture of health impacts is deemed necessary.
- The NHS BOB ICB expressed their strong support for the policy.

Appendix 1: Proposed main modifications emerging from Hearing Statement

This Schedule sets out proposed 'main modifications' to the Local Plan Partial Update as a result of the contents of this hearing statement.

For the avoidance of doubt, the modifications and references in the following table show changes to the Local Plan Partial Update Pre-Submission Draft, November 2024 [LP003b].

The above document is already in tracked changes format and shows how the adopted Local Plan (November 2019) would be amended. Please therefore be aware that there are two types of amendments shown in this schedule.

Changes already proposed to be made in the LPPU Pre-Submission Draft [LP003b]:

- Additional text that would amend the adopted Local Plan (2019) is shown in green and underlined: [Example](#)
- Deleted text that would amend the adopted Local Plan (2019) is shown in green and struck through: [Example](#)

Changes proposed as a main modification through the examination process:

- Additional text that would amend the Pre-Submission Draft LPPU (November 2024) is shown in blue and underlined: [Example](#)
- Deleted text that would amend the Pre-Submission Draft LPPU (November 2024) is shown in blue and struck through: [Example](#)

Amendments in blue supersede those in green, so for instance where a change proposed to the adopted Local Plan in green is proposed to be further amended or deleted, this is shown in blue only.

Table A1.1: Schedule of proposed main modifications

Modification Number	Page number [LP003b]	Policy/Paragraph [LP003b]	Main Modification	Reason for Main Modification (linked to soundness requirements)	Reference in this statement
Matter 4 - A	25	CC2	<p>Amend first sentence of policy as follows:</p> <p><i>Proposals for new-build development, including the construction of new building(s) and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of building(s) and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.</i></p>	To ensure feasibility and deliverability	Paragraphs 4.5.1 – 4.5.2
Matter 4 - B	25	CC2	<p>Amend second paragraph of policy as follows:</p> <p><i>All major non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM ‘Excellent’ standards to achieve net-zero development defined as “a scenario in which the quantity of anthropogenic greenhouse gas emissions arising from the development’s operational energy use on an annual basis is zero or negative, and where whole-life emissions are reduced through sustainable design measures.” Net zero building status must be achieved through the application of the following energy hierarchy:</i></p>	To ensure feasibility and deliverability	Paragraphs 4.5.1 – 4.5.2
Matter 4 - C	26	CC2	<p>Amend third paragraph of policy as follows:</p> <p><i>All new-build non-residential development proposals must include an energy statement which confirms that proposals:</i></p> <ul style="list-style-type: none"> <i>Can generate at least the same amount of renewable electricity on-site (and preferably on-plot) as they demand over the course of the year (reasonable estimates of regulated and unregulated use) using a methodology proven to accurately predict post-occupancy performance; and</i> <i>Achieve a site average space heating demand of 15-20kWH/m²/yr and a site average total energy demand of 70kWH/m²/yr. No unit shall exceed total energy demand of 90kWH/m²/yr, irrespective of the amount of on-site renewable production. (‘Total energy demand’ means the amount of energy used as measured by the metering of the building with no deduction for renewable energy generated on site)²¹.</i> <p>Insert new footnote and renumber subsequent footnotes as follows:</p> <p>²¹ Applicants should refer to the LETI Climate Emergency Design Guide for specific guidance with regard to different types of non-residential buildings, such as schools or commercial offices: https://www.leti.uk/ files/uqd/252d09_3b0f2acf2bb24c019f5ed9173fc5d9f4.pdf</p>	To ensure feasibility and deliverability and to refer to additional technical guidance	Paragraphs 4.5.1 – 4.5.2 and 4.3.13
Matter 4 - D	26	CC2	<p>Amend fourth paragraph and insert new paragraph afterwards as follows:</p> <p><i>An energy statement should include pre-built estimates and as-built calculations prior to occupation²¹. Weight will be given to proposals which demonstrate a commitment to on-going monitoring post-occupation which can be clearly communicated to the occupier.</i></p>	To ensure feasibility and deliverability and to refer to additional technical guidance	Paragraphs 4.5.1 – 4.5.2 and 4.3.13

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			<p><i>Major proposals that relate to either works to existing non-residential buildings or conversion to residential should demonstrate that the energy hierarchy has been followed as far as practicable and viable. These are not required to reach net zero but should apply the energy hierarchy in the design process and demonstrate the resulting improvement via the provision of energy and/or carbon performance figures²² that would occur before and after the proposed works.</i></p> <p><i>Insert new footnotes and renumber subsequent footnotes as follows:</i></p> <p>²¹ Applicants should refer to CIBSE TM54: Evaluating Operational Energy Use at Design Stage.</p> <p>²²Accepted metrics for these figures include renewable energy generation per annum; or space heat demand and energy use intensity calculated using accurate energy prediction methodologies such as PHPP or CIBSE TM54.</p>		
Matter 4 - E	27	CC2	<p><i>Amend sixth paragraph as follows:</i></p> <p><i>The demolition of an existing building should be accompanied by a full justification for demolition²⁵ and demonstrate how 95% of all construction waste will be diverted away from landfill.²³²⁶ For non-listed buildings, demolition will only be acceptable where:</i></p> <p><i>Insert new footnote, amend existing footnote and renumber subsequent footnotes as follows:</i></p> <p>²⁵Sites allocated within the Local Plan are not subject to the requirement for full justification for demolition.</p> <p>²³²⁶ Applicants should refer to the RICS Professional Standard Whole Life Cycle Assessment as a preferred methodology. Additional guidance can also be found at https://www.london.gov.uk/sites/default/files/circular_economy_statements_lpg_0.pdf</p>	To provide clarification and to provide further technical guidance for applications	Paragraph 4.3.13
Matter 4 - F	29	CC3	<p><i>Amend third bullet point of policy as follows:</i></p> <p><i>• All development must address the risks of overheating through passive cooling and energy efficiency measures in the first instance³⁴</i></p> <p><i>Insert new footnote and renumber subsequent footnotes as follows:</i></p> <p>³⁴ Applicants should refer to the Good Homes Alliance Early Stage Overheating Risk Tool Checklist: https://goodhomes.org.uk/wp-content/uploads/2019/07/GHA-Overheating-in-New-Homes-Tool-and-Guidance-Tool-only.pdf</p>	To provide a specific linked reference for applicants to access the overheating risk tool checklist	Paragraph 4.7.9
Matter 4 - G	31	4.1.10	<p><i>Amend final sentence as follows:</i></p> <p>While Reading itself was not significantly affected by the floods of 2007 and 2008, around two thirds of flooding during the 2007 floods was caused by surface water³⁴³⁹. Further incidents occurred in 2013 and 2014, as well as in January 2024⁴⁰.</p>	To provide a specific linked reference for applicants to access the January 2024 Reading Flood Investigation Report	Paragraph 4.7.9

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			⁴⁰ The January 2024 Reading Flood Investigation Report can be found here: https://images.reading.gov.uk/2024/04/Section19-Flood-Report-RBC-final.pdf		
Matter 4 - H	31	4.1.12	<i>Amend second sentence as follows:</i> Ultimately, raising the height of flooring above <u>predicted design</u> flood levels is a better alternative. All types of flooding (fluvial, surface water and groundwater) must be considered.	To align language with the Strategic Flood Risk Assessment	Paragraph 4.7.9
Matter 4 - I	31	CC4	<i>Amend policy title as follows:</i> CC4: DECENTRALISED ENERGY HEAT NETWORKS	To align terminology with national policy	Paragraphs 4.8.7, 4.8.8
Matter 4 - J	31	CC4	<i>Amend second and third paragraphs of policy as follows:</i> <u>Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq m shall consider the inclusion of must include decentralised energy provision, within the site demonstrate how a connection will be made to a suitable low carbon heat network where available in the vicinity, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision. Where no such network is available, heat and/or cooling must be supplied from low carbon sources⁴¹ and be connectable to future heat network.</u> <u>Where there is an existing decentralised energy provision low carbon heat network present within the vicinity of an application site, further developments of 10 dwellings or more or non-residential development of 1000 sq m or more will be expected to link into the existing decentralised energy network low carbon heat network or demonstrate why this is not feasible.</u> <i>Insert new footnote and renumber subsequent footnotes as follows:</i> <u>⁴¹Defined as meeting the Government standard of 100g/CO₂/kwh for heat networks. For centralised or site-based schemes, defined as SCOP 2.8 of the UK Net Zero Building Standard.</u>	To clarify definitions, refer to national policy standards and align language with national policy	Paragraphs 4.8.7, 4.8.8
Matter 4 - K	31	4.1.13	<i>Delete paragraph and insert new paragraph as follows:</i> <u>Decentralised energy is produced locally and provides energy to buildings close to the site of production. The term covers a variety of technologies including various renewable technologies, and more efficient energy generation such as Combined Heat and Power (CHP), which provides heating and electricity at the same time. This policy promotes the use of decentralised energy including CHP and district heating, which has particular applications to dense urban areas such as Reading. It provides an explanation of when CHP or district heating should be considered as an energy efficient design measure to achieve the most up-to date requirements for net zero development. More information on decentralised energy will be published in the forthcoming Sustainable Design and Construction SPD.</u> <u>Heat networks distribute heat or cooling from a central source or sources and deliver it to a variety of different customers such as public buildings, shops, offices, hospitals, universities and homes. By supplying multiple buildings, they avoid the need for</u>	To update language according to emerging technologies and to clarify terms	Paragraphs 4.8.7, 4.8.8

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			<u>individual boilers or electric heaters in every building. Heat networks are also uniquely able to use local sources of low carbon heat which would otherwise go to waste. This could be from factories, the ground or even from rivers. Environmental heat or waste can be captured and 'stepped' up using heat pumps to supply heating and/or cooling for buildings. These sources can include air, water sources such as rivers and aquifers and/or the ground. Air source heat pumps can either be communal within a development or provided individually in dwellings/premises. The former would typically be considered to be connectable to a heat network, provided a suitable design is used whereas the latter would not.</u>		
Matter 4 - L	32	4.1.14	<p><i>Amend paragraph as follows:</i></p> <p>Electricity production <u>is currently dominated by a centralised in the UK comes from a range of sources and is delivered via the national electricity generating system network. Centralised electricity generating stations that use fossil fuels waste around two thirds of the energy in the fuels they use through the production of waste heat in generation then in electricity transmission and distribution to end users. On average, around 60 30% of the energy is lost before it even reaches consumers. If better use could be made of this waste heat, and transmission distances could be reduced, there would be major benefits in tackling climate change and improving security of supply. A decentralised energy system (which might include CHP) can help address these issues. Renewable energy generation which is fed into the National Grid (transmission network) is a much more efficient and clean energy source and is typically combined with other renewable and non-renewable sources at differing proportions according to weather conditions and demands. This means that the carbon intensity of grid electricity varies over time.</u></p>	To align language with emerging technologies and clarify terms	Paragraphs 4.8.7, 4.8.8
Matter 4 - M	32	4.1.17	<p><i>Amend paragraph as follows:</i></p> <p>Following the <u>production of heat spot maps work by the Council working with the Heat Network Delivery Unit in the Department of Energy Security and Net Zero, a heat-mapping and masterplanning study was produced by Element Energy. Subsequently, two, a feasibility studies for the North of the Station and Minster Quarter areas were produced. These areas represent the main opportunity areas within the Town Centre and schemes within these areas are considered to be strategically significant and will enable the viability of heat networks.</u> of the Borough, carried out by Thames Valley Energy (TVE), has identified potential opportunities for decentralised energy provision including district heat energy provision and CHP plant, which consider both existing and likely new development in the Borough as currently allocated. Potential for district heat networks continues to be and energy provision is being explored in areas of across the town centre, much of which is expected to fall within the Heat Network Zone in forthcoming regulations. but represents just one of the many possible ways of fulfilling the requirements of policy CC4.</p>	To update the explanatory text based on recent work within the Council.	Paragraph 4.8.9
Matter 4 - N	33	4.1.19	<p><i>Amend paragraph as follows:</i></p> <p>The success of such a scheme <u>relies on both in terms of, for example, establishing the CHP plant (as part of a decentralised energy network) and heat sources and energy centres, but also needs to consider pipework, thermal storage and future connections, to the plant of both existing buildings and new buildings. It must also</u></p>	To update according to emerging technologies	Paragraphs 4.8.7, 4.8.8

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			<p><u>consider the internal design of buildings which need to accommodate wet distribution systems, preferably with underfloor heating, laterals, risers and space for plant. The implementation of the scheme</u> will be dependent on the creation of strong partnerships between Reading Borough Council where relevant, the developer or representative of existing businesses and an Energy Service Company (ESCO). The involvement of an ESCO will allow multiple users to access the energy from the scheme and set out the contracts for doing so.</p>		
Matter 4 - O	33	4.1.20	<p><i>Amend paragraph as follows:</i></p> <p><u>4.1.20 Decentralised energy infrastructure has the potential to impact on the significance of heritage assets, including their setting. Such impacts should be assessed via proportionate heritage impact assessment, as appropriate. Due to the underground nature of heat networks, particular attention should be paid to any possible archaeological impacts as detailed in Policy EN2: Areas of Archaeological Significance.</u></p>	Agreed in Statement of Common Ground with Historic England [EX014]	Paragraph 4.8.7
Matter 4 - P	35	CC7	<p><i>Amend first sentence of policy as follows:</i></p> <p><u>All development must be of high-quality design, employing characteristics to create, maintain and enhance physical character, nurture and sustain a sense of safety and community and positively address environmental issues affecting the climate.</u></p>	To emphasise safety as an overarching principle of design	4.9.8
Matter 4 - Q	35	CC7	<p><i>Amend sixth bullet point of policy as follows:</i></p> <p><u>• Public spaces – creates safe, secure, social and inclusive public spaces and streets.</u></p>	To align text with language used by Thames Valley Police	4.9.8
Matter 4 - R	41	CC9	<p><i>Amend fifth bullet point under third paragraph of policy as follows:</i></p> <p><u>• Economic development services and infrastructure, including employment, skills and training development initiatives, digital infrastructure and childcare provision.</u></p>	To refer to the importance of digital infrastructure as identified in LP011	4.11.10