

# **Examination of the Reading Borough Local Plan Partial Update**

## **Reading Borough Council Hearing Statement for Matter 8: Retail, Leisure and Culture**

**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 policies for retail, leisure and culture justified, effective and consistent with national policy?**

### **8.1 Is Policy RL2 justified and effective?**

- 8.1.1 Policy RL2 is justified in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on robust and proportionate evidence. It is effective in that it is deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 8.1.2 Much of the text of policy RL2 remains unchanged from the existing Local Plan, which was examined and found to be justified and consistent with national policy, subject to a main modification which was incorporated into the adopted version. The Local Plan Review 2023 [LP011] at paragraphs 3.484-3.492 (p 64) assesses the need for update in the context of changes since adoption, and identifies the need for updates solely in relation to:
- The need to reassess needs for retail and leisure development to take account of changes to shopping patterns, in particular to take the impact of Covid into account; and
  - Monitoring data that shows a net loss of retail floorspace compared to the gain that the policy seeks.
- 8.1.3 The justification for the proposed changes to policy RL2 is set out primarily in the Commercial Needs Assessment (CNA) [EV006] and the relevant appendices [EC007-EV009]. Based on fresh household surveys conducted during August 2024, together with an understanding of current trends in the sector and the health of identified centres, the CNA identified retail floorspace needs for Reading. It identified a small positive need for convenience goods floorspace of 727 sq m by 2041 and an oversupply of comparison goods floorspace of 2,919 sq m over the same period. As there are not generally effective controls over whether goods sold are convenience or comparison (unless it is controlled by condition on a purpose-built out of centre site), the Council takes these figures together resulting in an overall oversupply of 2,192 sq m. This leads to the conclusion written into the policy that there is no positive need for new retail floorspace.
- 8.1.4 However, we have noticed that the figures quoted in paragraph 4.6.9 of the LPPU do not accord with those shown in the tables on p44 of the CNA. It is not clear how this occurred. A main modification is therefore proposed to bring these into line. The overall conclusions are not affected.
- 8.1.5 In terms of leisure uses, the CNA did not identify specific needs for additional facilities but did emphasise the importance of replacement of the Vue cinema at the Oracle. Policy CR14g for this site includes retail and/or leisure, whilst the current

planning application on the site (22/1917) incorporates a replacement cinema within the proposal. No specific needs are therefore identified in the policy.

- 8.1.6 In terms of monitoring showing a net loss of floorspace, the policy response of refocusing the policy on the level of floorspace needed for the vitality and viability of centres is considered an adequate response. The changes to create use class E create greater flexibility for diversification to support centres. The principle of many of these losses of retail and related floorspace is out of the control of planning as they are no longer classed as development.

- 8.1.7 The options considered for this policy were as follows:

- RL2(i) – Update needs according to the most up-to-date information (proposed option)
- RL2(ii) – No update to policy

In the context of the substantially changed level of needs, the second option was not appropriate.

- 8.1.8 In terms of being effective, as there are no positive needs identified, the policy is deliverable within the plan period. The situation with retail needs in Reading has been based on effective cross-boundary working, as it was first identified in duty to co-operate meetings with neighbouring authorities conducted in Autumn 2023, neighbouring authorities were invited to comment on the draft CNA, and the matter was reflected in Statements of Common Ground signed with South Oxfordshire District Council/Vale of White Horse District Council, West Berkshire District Council, Wokingham Borough Council and Bracknell Forest Council (all within the Duty to Co-operate Statement [EV001]).

- 8.1.9 Representations received at Regulation 19 stage were generally supportive or provided further context that does not require response.

**8.2 *Is Policy RL3 justified and consistent with national policy? Is it clear that Key Frontages are defined on the Policies Map?***

- 8.2.1 Policy RL3 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.

- 8.2.2 For most of the criteria, there is limited change from the policy as it was examined and found to be justified, effective and consistent with national policy at Local Plan stage. The Local Plan Review 2023 [LP011] at paragraphs 3.571-3.585 (pp 86-89) forms the main justification, and it considers the need for an update and comes to the conclusion that an update is needed in relation to:

- Changes to the Use Classes Order that affect the implementation of the policy; and
- High levels of vacancy in certain centres that may indicate a need for a policy response.

The changes to the Use Classes Order forms the main basis for the policy update. In the Council's view this also helps to address issues of vacancy by removing barriers around changes of use within the policy.

8.2.3 The alternatives that were considered were limited to the updates themselves in order to be proportionate, and were as follows:

- RL3(i) – Update policy to reflect new use classes and Article 4 Direction (proposed option)
- RL3(ii) – No update to policy
- RL3(iii) – Seek to retain a minimum proportion of use class E.

The 'no update' policy was rejected as it would result in a policy that is no longer capable of being applied. The minimum proportion of use class E option was rejected as use class E is sufficiently broad that most town-centre uses are now included within this use class meaning that it would be something of a meaningless requirement as it would encompass almost all centre uses in any case.

8.2.4 In terms of consistency with national policy, the main changes to this policy are to bring it in line with changes at a national level to the use classes order which meant that original criterion a) of the policy can no longer be applied. This also feeds into much of the supporting text. However, the policy remains consistent with national policy in paragraph 90 in particular, as follows:

- *“a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;”* – the changes would allow for greater flexibility by removing the references to a proportion of A1/A2 floorspace.
- *“b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;”* – this is the purpose of much of the policy, insofar as is possible within changes to use classes.
- *“f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites”* – criterion a) clarifies that residential uses will be acceptable on upper floors, but seeks to protect the vitality and viability of centres by prioritising centre uses on ground floors to strike the appropriate balance.

8.2.5 It is clear in criterion c) of the policy that key frontages are defined on the Proposals Map, and the frontages are shown within the centre insets. However, it is accepted that a reading of criterion a) would not make this clear. A simple proposed main modification is included in Appendix 1 to deal with this issue.

8.2.6 There was one representation on this policy at Regulation 19 stage, from Bracknell Forest Council relating to paragraph 4.6.16. Please note that in the Statement of Consultation [LP006] this comment has been mistakenly combined with BFC's comment on RL2. The representation conflates the term 'centre uses' and 'non-centre uses' used here and 'main town centre' uses from the NPPF. The use of these

terms is not intended to reflect the differently named terms in the NPPF, and the NPPF definition would not be appropriate in this context due to the inclusion of uses such as offices, which when located at ground floor do not bring particular viability to smaller centres and are not generally appropriate in the key shopping frontages.

**8.3 *Is Policy RL4 justified and supported by robust, up-to-date evidence? What is the rationale for the 150 square metres threshold?***

- 8.3.1 Policy RL4 is justified in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on robust and proportionate evidence.
- 8.3.2 The policy was examined and found to be justified, effective and consistent with national policy at Local Plan stage. The Local Plan Review 2023 [LP011] at paragraphs 3.586-3.593 (pp 89-90) considers the need for an update based on changes since the plan adoption and did not identify any update requirement. The need for a minor update was identified after Regulation 18 consultation stage and included in the June 2024 version of the Local Development Scheme [PP001], and referenced in paragraph 3.3. This was as applications for new types of gaming establishment started to be received and it was identified that there was a potential policy gap. It was considered that these were not necessarily an issue on their own in principle, but there were the same clustering concerns as exist with betting shops and payday lenders, and as proposals were emerging in some of the areas where those uses already cluster (such as Friar Street) it would be appropriate to include gambling establishments alongside those uses. The final sentence of the policy was added purely for clarification reasons.
- 8.3.3 The rationale for the 150 square metre threshold was set out as part of the Local Plan evidence. An extract from the relevant background paper is included in Appendix 1. The 150 square metre threshold was established based on existing clusters and where there is potential for clusters to form. This included assessing alternative thresholds of 150 sq m of an existing shop or 50 sq m thresholds. Since that evidence was produced, there has been little change in betting shop or payday lender locations. No permissions have been granted for additional betting shops or payday lenders. There have been applications that would result in the loss of a betting shop or pay day lender, but these have not generally been in the areas identified as particular clusters. As such, the Council considers that the evidence at Local Plan stage remains robust.
- 8.3.4 In terms of the update only, the following options were considered:
- RL4(i) – Extend policy to cover all gaming establishments and clarification that where there are already three establishments within 150 sq m no further increase will be permitted (proposed option)
  - RL4(ii) – No update to policy
  - RL4(iii) – Set an alternative threshold

The existing threshold has been effective in striking a balance between preventing negative effects while still allowing for these uses to occur within the town.

8.3.5 There were no representations at Regulation 19 stage that pertained to the content of this policy.



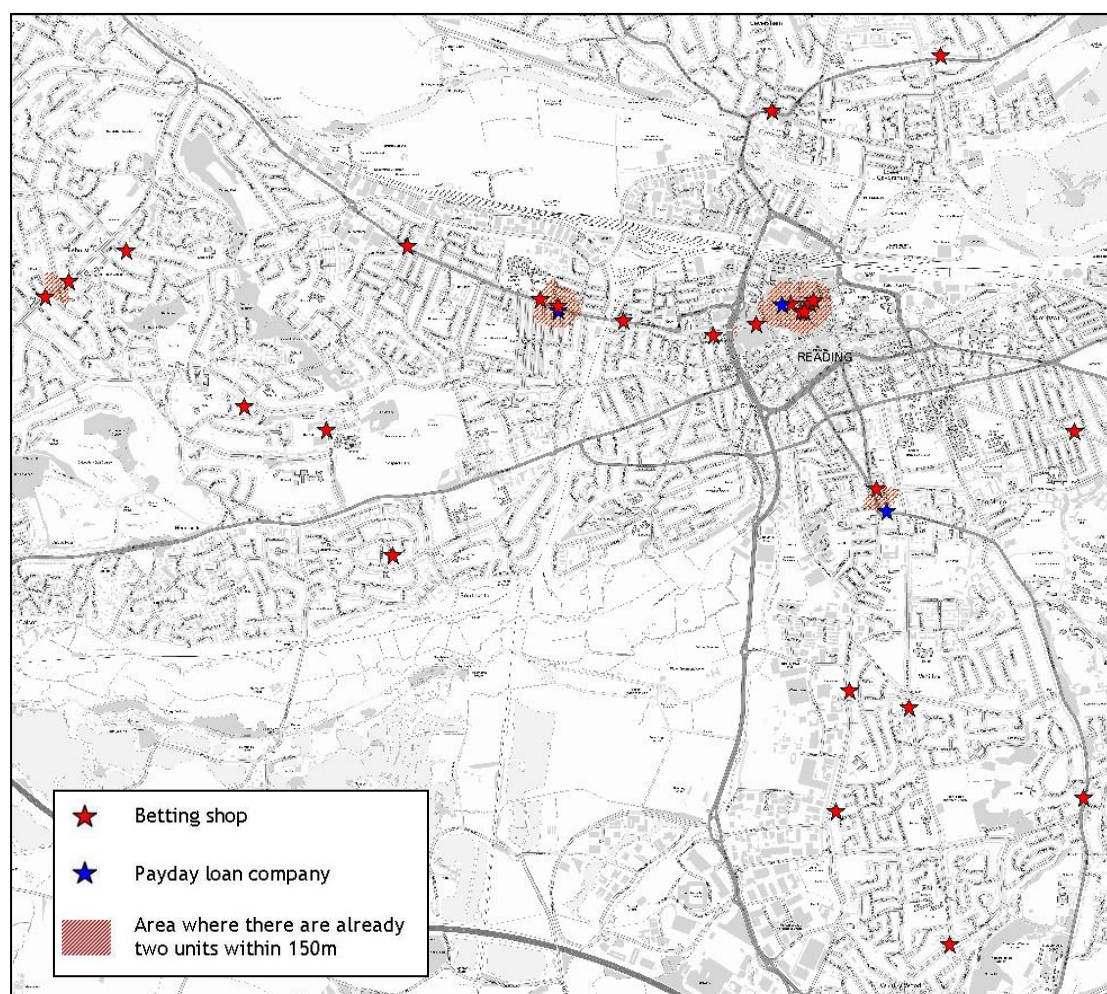
## Appendix 1: Extract from 2018 Local Plan Background Paper to justify policy RL4

### 4.54 Betting Shops and Payday Loan Companies (RL4)

#### 4.54.1 Key Considerations

- Recent changes to the Use Classes Order removed betting shops and payday loan companies from the A2 use class and designated them as sui generis uses, in their own use class. As such, they now fall within planning control.
- Whilst it is recognised that a single betting shop or payday loan company can make a contribution to the range of facilities within a centre, a proliferation of such uses can exacerbate existing economic problems in local areas, as well as having a detrimental effect on the appearance and character of the area, particularly where the shopfronts are obscured.
- The location of existing betting shops and payday loan companies is shown on Figure 4.30. This map also seeks to highlight areas where there are existing clusters, or the potential for clusters to form, by indicating those areas within 150 metres of at least two such units. The affected areas are part of central Reading around Friar Street, and areas on Oxford Road, Whitley Street and Tilehurst Triangle.

Figure 4.30: Location of betting shops and payday loan companies





#### 4.54.2 *Policy Options*

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

- **RL4(i) No policy - REJECTED**

This option would allow continued proliferation of betting shops and payday loan companies, which would lead to harm to visual amenity, exacerbate existing economic problems, reduce diversity in the centre and potentially lead to reduced footfall in some areas.

- **RL4(ii) Use a 150m radius of existing shops - PROPOSED OPTION**

This option would seek to avoid the emergence of clusters of betting shops and payday loan companies. It is considered that three units within 150m of one location would represent an unacceptable cluster. To some extent, this is a matter of judgement, but as shown on Figure 4.30, the use of this approach picks up on the main areas of concern without being unreasonably restrictive on the establishment of new uses.

- **RL4(iii) Less restrictive (50m radius) - REJECTED**

This option, with the same approach as the proposed approach but using a 50m buffer rather than 150m, would not be effective, as it could easily lead to a proliferation of uses in close proximity. 50 metres is very little distance in the context of a shopping street, and could result in six or seven such units even within a local centre such as Wokingham Road.

## Appendix 2: 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 A2.1: 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 8 - A	158	4.6.9	<p><i>Amend paragraph as follows:</i></p> <p>The <del>Council worked jointly with Bracknell Forest Borough Council, Wokingham Borough Council and West Berkshire District Council to</del> commissioned consultants to identify the need for additional retail and leisure development in the <del>Western Berkshire Housing Market Area Reading to 2036</del>2041. The final <del>Retail and Leisure Study Commercial Development Needs Assessment</del> reported in <del>May 2017</del> November 2024. It found a <del>positive need for</del> overprovision of <del>5,467-2,919 sq m</del> of comparison goods floorspace (<del>net</del>) of 54,400 sq m (<del>net</del>) by 2036, much of which is required in the second half of the plan period after 2026 up to 2041. In terms of convenience goods, <del>an overprovision a very small positive need of 428 727 sq m (net)</del> was identified <del>of 19,500 sq m (net)</del> by <del>2036</del> 2041. Our approach is to consider this as a whole, as no planning permission is generally required to change between convenience and comparison goods, unless it is controlled by planning condition. <del>The Council's approach is also to treat this as very much a maximum, as there is considerable uncertainty about the retail landscape after 2026, when most of the need arises. As a result, no positive overall need for retail floorspace has been identified.</del></p>	To ensure that the policy is justified in relating fully to the evidence base and is effective in clarifying that the floorspaces are net.	Paragraph 8.1.4
Matter 8 - B	159	RL3	<p><i>Amend second bullet point in criterion a) as follows:</i></p> <p>• <b><i>There would be no net loss of 'centre uses' for 'non-centre uses' at the ground floor (apart from entrances to upper floors), <u>particularly in the Key Frontages as identified on the Proposals Map</u>, except in exceptional circumstances. On upper floors, other uses including residential ('living over the shops') will be acceptable.</i></b></p>	To ensure that the policy is effective	Paragraph 8.2.5