

Examination of the Reading Borough Local Plan Partial Update

Reading Borough Council Hearing Statement for Matter 9: Other uses

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 other uses justified, effective and consistent with national policy?

9.1 Is Policy OU1 justified and effective?

- 9.1.1 Policy OU1 is not within the scope of the Partial Update as confirmed in table A1.1 of the Council's Response to Initial Questions Part 1 (July 2025) [EX002]. The proposed change is a factual amendment to the supporting text that in the Council's view constitutes a minor modification.
- 9.1.2 Policy OU1 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 effective in that it is deliverable over the plan period.
- 9.1.3 The policy is unchanged in the LPPU, and the adopted policy 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. Since then, as confirmed by paragraphs 3.612-3.620 (pp92-93) of the Local Plan Review 2023 [LP011] there have been no significant changes in terms of national policy, other policy or other changes in circumstances that necessitate a change. This constitutes the main evidence for the position. Examining alternatives has been limited to areas within the scope of the update in order to be proportionate.
- 9.1.4 In terms of being effective, the policy is deliverable over the plan period. Monitoring has shown that floorspace for community facilities has increased by 20,000 sq m between 2019 and 2025, since the plan containing this policy was adopted. In terms of cross-boundary working, matters such as strategic healthcare and education needs are reflected in Statements of Common Ground with West Berkshire District Council and Wokingham Borough Council, and the University of Reading is also reflected in the Wokingham Statement of Common Ground.
- 9.1.5 There were three responses to this policy at Regulation 19 stage. The representation from Sport England was supportive although made some minor comments on numbering which the Council does not consider a soundness issue.
- 9.1.6 The comment from the Integrated Care Board gets into a number of matters of detail that are not best dealt with in this strategic policy, as it requires consideration of the individual circumstances of each site. In terms of the ICB's comments on use of CIL, i.e. that the Council does not intend to use CIL for healthcare, that is not an entirely accurate reflection of the Council's intentions, but use of CIL needs to be informed by specific proposals that can only come from the ICB or the surgeries, and which have so far not been forthcoming. In any case, the Council is now securing financial contributions towards primary healthcare via Section 106, such as in the heads of terms of the application on the John Lewis site (24/1115), which has been resolved to be granted subject to S106, where £146,880 will be secured towards primary healthcare.

- 9.1.7 In terms of the ICB's request for an additional policy, it is considered that the most important elements of the proposed additional policy are already covered in OU1 and an additional policy is unnecessary. Some of the statements in the ICB's proposed wording are also in the Council's view unnecessarily restrictive and could negatively affect the supply of much-needed health premises. There also needs to be greater flexibility around format (e.g. on-site parking) if use is to be made of town centre sites where the need is greatest.
- 9.1.8 Wokingham Borough Council raise some issues with potential for insufficient school places being provided, but the Council is confident that this issue will not arise, as school places will be sufficient with the recent opening of the Civitas Academy (primary) and River Academy (secondary), as well as the expansion of intake recently granted on appeal at The Heights Primary School (23/1023). In the latter case, the Council argued at appeal that this expansion actually puts existing Caversham schools at risk due to insufficient pupil numbers. This is a matter that can be considered at five-year review stage if the situation changes, particularly since education place planning usually takes place on a five-year cycle.
- 9.2 Is Policy OU2 justified, supported by robust evidence, and consistent with national policy? Is the Council's approach to the Detailed Emergency Planning Zone and other consultation zones for Atomic Weapons Establishment Burghfield consistent with that of its neighbours, West Berkshire District Council and Wokingham Borough Council?*
- 9.2.1 Policy OU2 is justified in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on robust and proportionate evidence.
- 9.2.2 The part of the policy on non-nuclear hazardous installations is unchanged in the LPPU, and the adopted policy was examined and found to be justified, effective and consistent with national policy in 2019. Since then, as confirmed by paragraphs 3.621-3.632 (pp93-94) of the Local Plan Review 2023 [LP011] there have been no significant changes in terms of national policy, other policy or the status of facilities on the ground that necessitate any change.
- 9.2.3 The significant changes relating to the Atomic Weapons Establishment (AWE) Burghfield have however resulted in the need for significant amendments to the policy, which previously only identified consultation zones in supporting text. In 2020, in response to the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPiR), the Detailed Emergency Planning Zone (DEPZ) was significantly extended and for the first time covered areas in Reading. The DEPZ immediately became a material consideration regardless of its Local Plan status, and it is something that is essential for the Local Plan to deal with, as reflected in the Local Plan Review [LP011]. The relevant bodies (West Berkshire District Council (WBDC), AWE, the Office for Nuclear Regulation (ONR) and Ministry of Defence (MoD) have been clear that the impact of development should be assessed through the impact on the AWE Off-Site Emergency Plan (OSEP), owned by WBDC. As this is a cross-boundary plan, it requires consistency across local authority boundaries. However, as the DEPZ boundary is subject to periodic review outside the Local Plan process and this issue is subject to legislative changes as has recently occurred, this

part of the policy needs to include some flexibility around matters such as the extent of the boundary and the name of the relevant emergency plan.

9.2.4 In terms of being justified in terms of alternative options, the following were considered:

- OU2(i) – Additional clause to make specific reference to development within the revised DEPZ, new boundary added to Proposals Map, supporting text updated with regards to AWE Burghfield (Proposed Option)
- OU2(ii) – No update to policy.

The Council does not consider that there is a great deal of scope for alternative options in the context of national policy and the fact that the DEPZ will be a material consideration with or without a policy update. In this context, the no update option was also rejected.

9.2.5 The changes relating to the DEPZ are consistent with national policy. Paragraph 101 of the NPPF (OP001) states that:

“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

...

b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.”

9.2.6 It should be noted that the consultation draft of the new NPPF in P1 and P5 makes specific reference to Detailed Emergency Planning Zones. Although this is not the version of the NPPF on which the LPPU is examined, it makes clear that this issue will likely have increasing prominence at national level.

9.2.7 The Council has sought to ensure that its policy is consistent with those of its neighbouring authorities insofar as is appropriate, taking into account that the Wokingham Local Plan Update is also currently at examination and that, as West Berkshire is the authority within which the AWE facility is located and that West Berkshire has additional responsibilities regarding emergency planning, the West Berkshire Local Plan policy needs to include additional information.

9.2.8 However, a number of representations were made at Regulation 19 stage including from West Berkshire District Council (WBDC), Wokingham Borough Council, AWE and ONR that are relevant to this issue, including matters such as the lack of reference to ONR’s consultation zones, which are highlighted in the neighbouring plans’ policies. The Council agrees that modifications are required to the LPPU to ensure that it is sound, and a Statement of Common Ground has therefore been agreed with WBDC and ONR that contains proposed modifications to address these points. AWE were also invited to sign, and although broadly supportive of the changes, were not able to commit to sign up in time due to internal processes. This has been added to the examination library as EX045, and the modifications are set out in Appendix 1 here for completeness. There are still some outstanding points from WBDC that are noted in the Statement of Common Ground, such as a

preference for splitting the policy into two to deal with nuclear and non-nuclear issues, but these are relatively minor and the Council does not consider them necessary, particularly with the improvements to text clarity as a result of proposed main modifications. WBDC and ONR also want to see a clearer statement that ONR advice against a proposal will lead to refusal, but the Council considers that this would remain a matter for the decision-maker, albeit that the ONR advice will carry significant weight.

9.2.9 A main modification is also proposed to the Wider Spatial Context section of the Spatial Strategy to highlight this issue and provide context to the zones that are already shown on Figure 3.1. This is set out in Appendix 1.

9.2.10 A number of other parties have also made representations, and some of the most pertinent points are described below:

- That the approach incorporates too much flexibility regarding changes to zones and naming (Mapletree). The Council considers that a level of flexibility is essential given recent history with the site, otherwise a decision maker will not know how to assess a planning application within a renamed or amended zone. Should this level of flexibility be contained within the plan, it should avoid the situation arising with the appeal highlighted by Mapletree.
- That there are other potential routes to demonstrating a satisfactory approach to emergency planning other than the AWE OSEP (SEGRO, Woolf Bond). The Council does not agree with this point as the purpose of the OSEP is to co-ordinate emergency planning across the area. Sheltering in place could be achieved for a short period, but at some point people sheltering will need to return to homes and families, and without co-ordination with the OSEP this could take place in a haphazard manner. Detailed emergency plans for specific developments and the OSEP need to work in harmony. This approach is also consistent with Reading's neighbours.
- That the DEPZ has been incorrectly defined as it does not accord with REPPiR as it covers too large a population (Woolf Bond). The Council does not have any comment on this matter as it did not define the DEPZ and has no powers to amend it, but it is now in place and is a material consideration regardless of the LPPU.

9.3 *Is Policy OU3 justified and consistent with national policy?*

9.3.1 Policy OU3 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.

9.3.2 The policy is based on the adopted policy 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.

9.3.3 Paragraphs 3.633-3.640 (pp94-95) 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 roll-out of 5G communications infrastructure;

- New permitted development rights for telecommunications; and
- Changes to national and other policies relating to telecoms.

9.3.4 The updated policy addresses these in the following manner:

- The roll-out of 5G is mainly dealt with by reflecting that the size of the installations is likely to increase (paragraph 4.7.19) and this has knock-on implications for whether the previous approach of lamp-column swap-outs is deliverable, meaning that specific references to swap-outs in the policy and supporting text are removed.
- New permitted development rights are reflected in new paragraph 4.7.21.
- Changes to national policy relate to a need to support expansion of electronics communication networks. The Council considers that this is already largely achieved by the existing policy, but that the removal of references to swap-outs helps in this regard. It also refers to taking into account “*providing reasonable capacity for future expansion*” when considering the need to keep masts to a minimum. The policy contains no statements on keeping masts to a minimum, although there is a new statement on cumulative effects in a certain area, which the Council considers is necessary and does not require minimisation of new masts overall. It should be noted that the NPPF at paragraph 119 already refers to the need to keep masts to a minimum.

9.3.5 The following options were assessed (focusing on the proposed updates for reasons of proportionality):

- OU3(i) Removal of reference to outdated technology, strengthen requirement for careful siting and design of masts (proposed approach)
- OU3(ii) No reference to changing technology, the new role of permitted development rights, or the investigation of alternative sites.

The operation of national policy and the evolution of circumstances around technology means that genuine alternative options are very limited.

9.3.5 In terms of being compliant with national policy, this is dealt with in part in the third bullet point above. In addition, the policy also complies with the following NPPF statements:

- Paragraph 119: “*Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.*” – second and third bullet point.
- Paragraph 120: “*Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development.*” – the policy makes no such stipulations.

- Remainder of paragraph 120 and 121 – these statements will be applied in Reading and do not need to be repeated in the Local Plan. Nothing in policy OU3 prevents this from occurring.
- Paragraph 122: *“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.”* – the policy contains no statements which contradict this.

9.3.6 No representations were received on this policy at Regulation 19 stage.

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 9 - A	19	After paragraph 3.1.3	<p><i>Insert new paragraph as follows:</i></p> <p><u>3.1.4 Figure 3.1 also illustrates constraints such as the extent of the AWE Burghfield Detailed Emergency Planning Zone (DEPZ). Information on the DEPZ and its implications for development within the Borough are detailed within Policy OU2: Hazardous Installations.</u></p>	To provide context to Figure 3.1 to ensure that the plan is effective.	Paragraph 9.2.9
Matter 9 - B	168	Policy OU1	<p><i>Amend policy as follows:</i></p> <p><u>a. Proposals for hazardous substances consent, or development in the vicinity of hazardous sites or pipelines, will not be permitted unless it has been satisfactorily demonstrated that the amount, type and location of hazardous substances would not pose adverse health and safety risks to the surrounding population and environment; and that any necessary special precautions to limit other potential societal risks to acceptable degrees would be put in place prior to the development commencing.</u></p> <p><u>b. Any proposal for development within the Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield (AWE B), shown on the Proposals Map or as subsequently amended, that would increase the residential or non-residential population and/or level of activity will not be acceptable be refused unless:</u></p> <ul style="list-style-type: none"> <u>it does not prejudice the security and future current and future operations and defence capabilities of AWE B; and</u> <u>any increase in population within the DEPZ can be accommodated in the context of the AWE B Off-Site Emergency Plan (or any successor under an alternative name) at the time of the planning application.</u> <p><u>a. A proposal that falls within the consultation zones for nuclear sites set out by the Office for Nuclear Regulation at the time of the planning application and which triggers the relevant criteria will be subject to consultation with ONR. If the proposal poses an external hazard to a nuclear site or if it cannot be accommodated within the Off-Site Emergency Plan it will be refused.</u></p>	To respond to Reg 19 comments by ONR and MOD	Paragraph 9.2.8
Matter 9 - C	169	Paragraph 4.7.14	<p><i>Amend paragraph as follows:</i></p> <p>The Health and Safety Executive (HSE) and, for nuclear licensed sites, the Office for Nuclear Regulation (ONR), acting jointly with and the Environment Agency (EA), who together form the statutory body of the COMAH (Control of Major Accident Hazards) Competent Authority, and provide specialist advice to the Borough on matters relating to non-nuclear hazardous sites. Therefore, both planning applications for development within specified distances of non-nuclear licensed hazardous sites, or pipelines, and/or proposals for new hazardous installations will be referred to the HSE and/or EA and Emergency Planners. The principal aim of the COMAH Competent Authority is to reduce the risks of potential major accidents that are associated with the handling of hazardous</p>	To separate references to COMAH and nuclear regimes to avoid confusion.	Paragraph 9.2.8

Modification Number	Page number [LP003b]	Policy/Paragraph [LP003b]	Main Modification	Reason for Main Modification (linked to soundness requirements)	Reference in this statement
			substances. The Office for Nuclear Regulation (ONR) is the independent nuclear regulator and, acting jointly with the EA, is the COMAH competent authority responsible for nuclear-licensed sites.		
Matter 9 - D	169-170	Paragraph 4.7.16	<p><i>Amend paragraph as follows:</i></p> <p>WBDC maintains the Off-Site Emergency Plan (OSEP) for AWE Burghfield, and Emergency Planning at RBC will be best placed, in consultation with WBDC, which maintains the Off-Site Emergency Plan (OSEP) for AWE Burghfield, and the AWE Off-Site Emergency Planning Group as necessary, to judge how a proposal will impact the OSEP and therefore the health, safety and wellbeing of the community. Proposals for any increase in population or activity within the DEPZ (including working or visiting population) should be subject to consultation with ONR, AWE and the Ministry of Defence (MOD) as well as Emergency Planning services in both West Berkshire and Reading. ONR should also be consulted on planning applications of certain types within the Outer Consultation Zone (a 5 km radius) of AWE Burghfield and the 12 km zone of both AWE Burghfield and AWE Aldermaston. Details of these types of application are provided by the ONR¹¹⁸. Consultation zones may change during the plan period, and the ONR will provide the latest information. The ONR will normally advise against a development should they not receive adequate assurance that the development can be accommodated within the AWE OSEP. As a result, the ONR will consider feedback provided by WBDC Emergency Planning Service, as the AWE OSEP owner under REPPIR. As the regulator, the ONR's response will carry significant weight. Should an unacceptable risk to the AWE OSEP be identified, a planning application would be refused.</p> <p>Add footnote as follows:</p> <p>¹¹⁸Land use planning Office for Nuclear Regulation</p>	To accurately reflect consultation arrangements and refer to consultation zones.	Paragraph 9.2.8
Matter 9 - E	239	Paragraph 6.2.1	<p><i>Add additional key principle as follows:</i></p> <p>j. The Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield places a constraint on development in parts of South Reading, and development within the zone will need to comply with the relevant policies in particular OU2.</p>	To ensure that the DEPZ is recognised as a high-level issue in South Reading as highlighted in a representation by AWE and MOD.	Paragraph 9.2.8
Matter 9 - F	243	New paragraph 6.2.13	<p><i>Add new paragraph 6.2.13 as follows:</i></p> <p>6.2.13 A significant part of South Reading falls within the Detailed Emergency Planning Zone for AWE Burghfield and this is a strategic consideration that will need to be carefully considered. Policy OU2 and its supporting text provides more detail.</p>	To ensure that the DEPZ is recognised as a high-level issue in South Reading as highlighted in a representation by AWE and MOD.	Paragraph 9.2.8