

Examination of the Reading Borough Local Plan Partial Update

Reading Borough Council Hearing Statement for Matter 10: Site-Specific Policies

January 2026

Contents

Contents	2
Central Reading.....	6
Issue 1: Are the policies for Central Reading justified, deliverable and consistent with national policy?	6
Taking each of the following proposed site allocations CR11a – CR11g, CR11i, CR12a – CR12e, CR13a – CR13d, CR14a, CR14d, CR14g – CR14j, CR14l –CR14ab individually, respond to the following questions for each site as relevant:	21
South Reading.....	22
Issue 2: Are the policies for South Reading justified, deliverable and consistent with national policy?	22
Taking each of the following proposed site allocations SR1a, SR1c, SR2, SR3, SR4a – SR4e and SR4g – SR4l individually, respond to the following questions for each site as relevant:	27
West Reading and Tilehurst.....	28
Issue 3: Are the policies for West Reading and Tilehurst justified, deliverable and consistent with national policy?	28
Taking each of the following proposed site allocations WR3b, WR3f - WR3l, WR3n -WR3p, and WR3r - WR3y individually, respond to the following questions for each site as relevant:	30
Site-specific questions	31
Caversham and Emmer Green.....	36
Issue 4: Are the policies for Caversham and Emmer Green justified, deliverable and consistent with national policy?	36
Taking each of the following proposed site allocations CA1a, CA1c - CA1f, and CA1h individually, respond to the following questions for each site as relevant:	37
East Reading	38
Issue 5: Are the policies for East Reading justified, deliverable and consistent with national policy?	38
Taking each of the following proposed site allocations ER1b – ER1e, ER1i, ER1k - ER1n individually, respond to the following questions for each site as relevant:	43
Appendices	44
Appendix 1: Central Reading site information for questions 10.13 to 10.18.....	44
CR11a: Friar Street & Station Road.....	45
CR11b: Greyfriars Road Corner.....	48
CR11c: Station Hill and Friars Walk.....	50
CR11d: Brunel Arcade and Apex Plaza.....	52
CR11e: North of the Station.....	55
CR11f: West of Caversham Road.....	58
CR11g: Riverside	60

CR11i: Napier Court.....	63
CR12a: Cattle Market.....	66
CR12b: Great Knollys Street and Weldale Street	69
CR12c: Chatham Street, Eaton Place and Oxford Road	72
CR12d: Broad Street Mall	75
CR12e: Hosier Street	78
CR13a: Reading Prison	81
CR13b: Forbury Retail Park	83
CR13c: Forbury Business Park & Kenavon Drive.....	86
CR13d: Gas Holder	88
CR14a: Central Swimming Pool, Battle Street.....	90
CR14d: 173-175 Friar Street and 27-32 Market Place	92
CR14g: The Oracle Riverside East	94
CR14h: Central Club, London Street	97
CR14i: Enterprise House, 89-97 London Street	99
CR14j: Corner of Crown Street and Southampton Street.....	100
CR14l: 187-189 Kings Road	102
CR14m: Caversham Lock Island and Caversham Weir, Thames Side	104
CR14n: Reading Central Library, Abbey Square	106
CR14o: 100 Kings Road	108
CR14p: Queens Wharf, Queens Road	110
CR14q: Havell House, 62-66 Queens Road	111
CR14r: John Lewis Depot, Mill Lane.....	113
CR14s: 20-22 Duke Street	115
CR14t: Aquis House, 41-59 Forbury Road	117
CR14u: 33 Blagrove Street	119
CR14v: 2 Norman Place	121
CR14w: Reading Bridge House, George Street	123
CR14x: Part of Tesco Car Park, Napier Road	125
CR14y: Kennet Place, Kings Road	127
CR14z: Sapphire Plaza, Watlington Street	128
CR14aa: Part of Reading College, Kings Road	130
CR14ab: 160-163 Friar Street.....	132

Appendix 2: South Reading site information for questions 10.24 to 10.29	134
SR1a: Former Landfill, Island Road	134
SR1c: Island Road A33 Frontage	137
SR2: Land North of Manor Farm Road	140
SR3: South of Elgar Road	144
SR4a: Pulleyn Park, Rose Kiln Lane	146
SR4b: Rear of 3-29 Newcastle Road	148
SR4c: 169-173 Basingstoke Road	150
SR4d: 16-18 Bennet Road	152
SR4e: Part of Former Berkshire Brewery Site	154
SR4g: Reading Link Retail Park, Rose Kiln Lane	156
SR4h: 11 Basingstoke Road	158
SR4i: 85-87 Basingstoke Road	160
SR4j: Land at Warwick House, Warwick Road	161
SR4k: Former Sales and Marketing Suite, Drake Way	163
SR4l: Land at Drake Way	165
Appendix 3: West Reading and Tilehurst site information for questions 10.33 to 10.38	167
WR3b: 2 Ross Road and Meadow Road	167
WR3f: 4 Berkeley Avenue	169
WR3g: 211-221 Oxford Road	170
WR3h: Rear of 303-315 Oxford Road	172
WR3i: Land at Portman Way	174
WR3j: Land at Moultsford Mews	176
WR3k: 784-794 Oxford Road	178
WR3l: 816 Oxford Road	180
WR3n: Amethyst Lane	182
WR3o: The Meadway Centre, Honey End Lane	184
WR3p: Former Alice Burrows Home, Dwyer Road	186
WR3r: Former Charters Car Sales, Oxford Road	188
WR3s: Land at Kentwood Hill	190
WR3t: Land at Armour Hill	192
WR3u: 132-134 Bath Road	194
WR3v: Former Southcote Library, Coronation Square	196

WR3w: Part of Tesco Car Park, Portman Road.....	198
WR3x: 1-15 St Georges Road	200
WR3y: 72 Berkeley Avenue	202
Appendix 4: Caversham and Emmer Green site information for questions 10.45 to 10.50	204
CA1a: Reading University Boat Club, Thames Promenade	204
CA1c: Land at Lowfield Road.....	206
CA1d: Rear of 200-214 Henley Road, 12-24 All Hallows Road & 7 & 8 Copse Avenue	208
CA1e: Rear of 13-14a Hawthorne Road & 284-292 Henley Road	210
CA1f: Rear of 1 & 3 Woodcote Road and 21 St Peter's Hill	212
CA1h: Hemdean House School, Hemdean Road	214
Appendix 5: East Reading site information for questions 10.55 to 10.60	216
ER1b: Dingley House, 3-5 Craven Road	216
ER1c: Land rear of 8-26 Redlands Road	218
ER1d: Land adjacent to 40 Redlands Road.....	220
ER1e: St Patrick's Hall, Northcourt Avenue.....	222
ER1i: 261-275 London Road.....	224
ER1k: 131 Wokingham Road.....	226
ER1l: Princes House, 73A London Road	228
ER1m: Land adjacent to 17 Craven Road	230
ER1n: 51 Church Road, Earley	232
Appendix 6: Submitted Wokingham Borough Local Plan policy on Whiteknights Campus	234
Appendix 7: Proposed main modifications emerging from Hearing Statement	235

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.

Central Reading

Issue 1: Are the policies for Central Reading justified, deliverable and consistent with national policy?

10.1 Is the strategy for Central Reading justified?

10.1.1 The strategy for Central Reading is justified in that it is a part of the wider spatial strategy, which includes a significant focus of development on Central Reading. There are very few changes proposed to the overall strategy from the strategy that is in the adopted Local Plan and was present in the Reading Central Area Action Plan (RCAAP, adopted 2009) that preceded it.

10.1.2 Much of the strategy was therefore based on the documents that fed into the RCAAP, most notably the City Centre Framework. This was an urban design-led document initially produced by Llewelyn Davies in 2002. An Update was prepared by Entec in 2008 to support the RCAAP, and this document was part of the evidence base for the Local Plan when it was submitted in 2018. It has not been included within the evidence base at this stage for reasons of proportionality, but its principles remain broadly up to date. As the City Centre Framework Update is important to answering questions 10.1 and 10.8-10.10 it has been added to the documents list as EX042.

10.1.3 The following are some of the key points that emerged from the City Centre Framework and have been incorporated into the strategy for Central Reading:

- The identification of three major opportunity areas corresponding to the three MOAs identified in the LPPU with some differences such as the exclusion of Apex Plaza (within CR11d) and Napier Court (CR11i), with more detailed guidance given on each.
- The need to respond to and reestablish the historic grid pattern of the town centre
- Permeability through the centre for pedestrians, cyclists and, where appropriate public transport and private vehicles
- A viable, broad and compatible mix of land uses including residential growth
- A continuous building line around blocks, with key streets and spaces activated by 'live' uses containing shopfronts
- Clusters of tall buildings as identified in the Tall Buildings Strategy [EV023] prepared at the same time by the same consultant
- Improvements to access including direct, safe and high quality routes for pedestrians and cyclists, the provision of mass rapid transit (MRT) and improvements to the station and reducing the barriers of the Inner Distribution Road (IDR) and railway

- An extension of high quality streets and spaces from the town centre along a north axis crossing the railway, IDR and River Thames.
- Streetscape improvements within the key existing town centre streets and spaces
- Potential locations for new areas of open space.

10.1.4 These principles have been established within and form the broad basis for the strategy for Central Reading. The establishment of the north-south axis was further emphasised from the Framework, as this is considered to be critical to several of the elements of the strategy, notably permeability, breaking down barriers and the creation of new streets and spaces, as well as forming the main axis for the largest of the major opportunity areas.

10.1.5 In paragraph 5.2.16, figures are included for the level of development that Central Reading is expected to accommodate. These have been derived from the Housing and Economic Land Availability Assessment (HELAA) [EX015] and reflect the assessed capacity of Central Reading sites, rather than being determined at a strategic level first and then sites found to meet it. This is necessitated by the need to develop suitable sites where they arise rather than there being significant development options within the Borough boundaries. As such, they are an approximate guide to the scale of development rather than being a hard and fast expectation. For housing, the amended version of the Housing Trajectory [EX041] now includes details on which permissions and allocations are within which area of Reading and have therefore contributed towards these totals. The totals also include an allowance for small site windfalls based on previous levels of completions in each area of Reading. A main modification is proposed to this paragraph to reflect the completions in 2024-25 and is set out in Appendix 7.

10.2 *Is Policy CR2 justified and effective?*

10.2.1 Policy CR2 is justified in that it is an appropriate strategy, taking into account the reasonable alternatives. The existing approach has been implemented successfully since the adoption of the 2019 Local Plan. This policy is intended to provide additional design considerations for applications within the central area and should be read in conjunction with CC7.

10.2.2 The policy is based on the adopted policy which was examined and found to be justified, effective and consistent with national policy. No main modifications were made to this policy at examination.

10.2.3 Paragraphs 3.666 – 3.675 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 updates are needed regarding:

- Change to planning guidance including the introduction of design code(s) and the publication of the National Design Guide and National Model Design Code; and
- The result of an appeal decision which highlighted the ambiguity of the phrase “respect the existing grid layout” and uncertainty about how conflicts between priorities stated within the policy should be resolved.

10.2.4 The updated policy addresses these in the following manner:

- Replace “respect the existing grid layout” in the first bullet point with “attempt to re-establish a grid layout” to account for areas in which there is fragmentation of the original grid;
- Addition of reference to biodiversity net gain and greater emphasis on the provision of green infrastructure given increased emphasis in national guidance;
- Addition of a final bullet point to clarify that when there is conflict between the priorities listed in the policy, the element which brings the greatest public benefit will be prioritised;
- Addition of supporting text to refer to the possibility of design code(s) adoption in the future given growing emphasis in national guidance on high-quality place-making and local design codes.

10.2.5 The only alternative option assessed was to continue with the existing policy. Given experience in an appeal since adoption which raised the issues highlighted in paragraph 10.2.3 above, this was rejected as it would fail to provide the clarity needed. Moreover, the existing supporting text fails to refer to design code(s).

10.2.6 In terms of being compliant with national policy, the proposed approach complies with the following NPPF statements:

- Paragraph 28 – *“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.”*
- Paragraph 96 – *“Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:*
 - a) *promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
 - b) *are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and*
 - c) *enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”*
- Paragraph 114 – *“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: [...] c)*

the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code.”

- Paragraph 133 – *“To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety.”*

10.2.7 The following comments were received at Regulation 19 stage:

- Historic England raised a typo in the final sentence of the policy itself. This change was proposed in the List of Changes to the Submission Draft [LP002] but is considered a minor modification.
- The Swifts Local Network: Swifts and Planning Group stated that the supporting text should refer to “swift bricks” rather than “swift boxes.” This change was originally proposed within LP002 and is included in Appendix 7 here.

10.3 Is Policy CR2 c) necessary given the content of Policy CC3 in terms of climate change adaptation and Policy EN12 on biodiversity?

10.3.1 It is considered that strengthened reference to the provision of green infrastructure and BNG is necessary given the relative high importance of these interventions within the central area. The policy does not seek to repeat the requirements of CC3 and EN12, but to draw applicants’ attention to this matter given the “otherwise very urban environment” in the centre. While other areas of the Borough have larger proportions of green space and green cover, the central area is dominated by hardstanding and buildings. The establishment of a green wall or roof in this area would bring significant improvements for biodiversity and design and serve residents living at higher densities than in surrounding areas.

10.4 What is the rationale for the mix of units in Policy CR6 i)? Is this justified and supported by a robust evidence base?

10.4.1 The original rationale for the existing mix of units was to seek to at least make a contribution to meeting the identified needs for family sized accommodation at the time and to avoid domination by smaller units of one-bedroom. This is to ensure that new residential offers a genuine mix of sizes and allows creation of a sustainable residential community in the town centre.

10.4.2 The rationale for the update is summarised in paragraphs 3.702-3.7.12 (pp 101-103) of the Local Plan Review [LP011]. This identified in particular the difficulties in delivering larger family homes in the centre of Reading and noted the size of recent developments in statistics which are updated below.

10.4.3 In terms of developments completed in the town centre in the period between submission of the plan in March 2018 and 31st March 2025, the size of dwellings delivered has been as follows:

- Studio/1-bed homes: net gain of 1,519 (56% of total)
- 2-bed homes: net gain of 1,135 (40% of total)
- 3-bed homes: net gain of 99 (4% of total)
- 4+-bed homes: net loss of 5 (N/A)

10.4.4 In terms of new permissions, a similar pattern can be seen, albeit slightly less dominated by 1-bed homes. The number of homes of each size newly permitted between 1st April 2018 and 31st March 2025 is as follows:

- Studio/1-bed homes: net gain of 2,543 (54% of total)
- 2-bed homes: net gain of 1,948 (42% of total)
- 3-bed homes: net gain of 186 (4% of total)
- 4+-bed homes: net loss of 3 (N/A)

10.4.5 It should be noted that one of the reasons why the delivery of new dwellings has not been in accordance with the policy targets is that much recent development and permissions has come in the form of prior approvals for conversions from offices or other commercial to residential, where there are no controls over the split of unit sizes.

10.4.6 The rationale for the mix of units more generally is as described in the answer to question 3.8 in the Hearing Statement for Matter 3 under the heading 'Mix'. This outlines that the Housing Needs Assessment [EV011] had identified that 60% of overall housing needs are for 3 bedrooms or more and also notes the difficulties Reading has in delivering larger family homes to meet this need.

10.4.7 The answer therefore makes clear that there is pressing need to increase the amount of homes of 3 bedrooms or more that are delivered in all locations across Reading. The amended policy percentages in CR6 intend to ensure a higher contribution towards meeting that need whilst still allowing for a mix of units on site to ensure diversity. They cannot be set at a level that would deliver the need in full as it would not be deliverable in a town centre environment, given that the town centre is generally dominated by smaller dwellings at a high density, and therefore the emphasis has been on increasing the proportion of 3-bedroom or more homes that are delivered in the town centre. The Consultation on Scope and Content at Regulation 18 stage suggested that this should rise to 10 or 15% in the town centre, and 15% forms the basis for the proposed update.

10.4.8 It should however be noted that the policy includes a statement that allows for viability to be considered, to allow development within the town centre to continue to come forward to meet the high level of housing need identified should inclusion of a policy-compliant number of larger units cause issues for scheme viability.

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

- CR6(i) – To increase the minimum proportion of family homes of three or more bedrooms expected on town centre sites from 5% to 10%.
- CR6(ii) – Developments for 15+ homes will include 5% of dwellings at three or more bedrooms
- CR6(iii) – To increase the minimum proportion of three-bedroom homes to 20%.

10.5 Is Policy CR7 justified and effective?

10.5.1 Policy CR7 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.

10.5.2 Much of the policy is unchanged from the existing version in the adopted Local Plan. At examination stage, the policy was found to be justified, effective and consistent with national policy. The Local Plan Review [LP011] in paragraphs 3.713 to 3.721 (pp 103-104) considers whether the policy needs to be updated and comes to the conclusion that an update is only required in terms of changes to the use classes order that affect the deliverability of parts of the policy.

10.5.3 Therefore the only proposed amendments to the policy relate to the new use class E, in place since 2020. The new use class makes the existing third paragraph of the policy which seeks to retain a minimum percentage of the key frontage in A1 or A2 use impossible to implement as the vast majority of changes of use that typically take place would not need planning permission as they would be to and from uses within use class E. It is therefore necessary for effectiveness that this part of the policy be deleted. There is very little that could replace it in practice, as retaining a minimum proportion in E class use would be meaningless given that it would cover the vast majority of likely uses and would therefore to some degree be a duplication of the first paragraph. There would also need to be some amendments to clarify which of the replacement use classes would be appropriate on the ground floor on the primary frontages.

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

- Removal of final paragraph following the updates to the Use Class Order which introduced Use Class E, amend wording to the 1st paragraph to refer to revised Use Class Order, changes to the existing/proposed frontages within Proposals Map.
- Wording to refer to former use classes and outdated existing/proposed frontages on Proposals Map.
- To seek to retain a minimum proportion of use to class E.

10.6 Is Policy CR10 justified, effective, consistent with national policy, and based on robust and up-to-date evidence? What is the justification for three clusters of tall buildings and areas of less suitability for tall buildings? How do areas of less suitability for tall buildings differ from the rest of the borough outside the clusters?

10.6.1 Policy CR10 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. It is also consistent with national policy.

- 10.6.2 Much of the policy is unchanged from the Local Plan, where it was examined and found to be justified and effective, and, subject to a main modification to ensure consistency with national policy on the historic environment that was incorporated into the adopted version, consistent with national policy. The Local Plan Review [LP011] in paragraphs 3.738 to 3.747 (pp 105-106) considers the need for update and considers the policy up-to-date. However, upon a later review of the evidence that underpins the policy and identification of a particular issue it was decided to bring the policy into scope of the update to resolve the issue.
- 10.6.3 The main evidence base that underpins the policy is the Tall Buildings Strategy (TBS) [EV023]. This dates from 2008, but its age in itself does not render it out of date. A Tall Buildings Update Note [EV024] has therefore been prepared to assess the degree to which the TBS is still up-to-date and to identify any matters that have arisen since its production that would have implications for the policy. In the Council's view this combined evidence base does not lead to any necessity to make significant changes to the overall approach based around the three clusters, which is an approach that is only part way through being implemented with many tall buildings in those clusters still with an unimplemented planning permission or not yet permitted at all. This was always a long-term strategy that would take a significant amount of time to come fully to fruition and a completely new approach would be unnecessary and unjustified.
- 10.6.4 It is not proposed here to repeat the content of the TBS and the Update Note which set out the justification and also consider consistency with national policy. In summary, however, the TBS initially carries out a townscape character assessment of Central Reading based on 26 character areas. This identified eight of those character areas as having some townscape capacity for tall buildings. Following this, topography, flood risk, historic assets and conservation, visual context (based on 16 key views within Central Reading and 28 key long range views), social infrastructure, sustainable travel, open space and a market analysis (mainly based on a separate document) were all considered and synthesised into a full assessment of each of those character areas with a low or medium townscape sensitivity. This came to the conclusion that the following eight character areas had high or moderate suitability for tall buildings.
- 1: Station Hill (high suitability)
 - 2: Station Area East (high suitability)
 - 15: Chatham Place (high suitability)
 - 16: The Civic Centre (high suitability)
 - 18: The Oracle (moderate suitability)
 - 19: Mallard Row to Fobney Street (moderate suitability)
 - 21: Forbury South (high suitability)
 - 22: Vastern Road (high suitability)

The Strategy then recommended three clusters, a Station cluster, Western Grouping and Eastern Grouping, based on the six character areas with high suitability. Finally the Strategy recommended some general principles to be included within the policy. This formed the basis for the policy approach in the current Local Plan.

10.6.5 The Tall Buildings Update Note reviews the content of the TBS and provides updates for 2025, considering whether any of the updates mean that the Strategy itself should no longer be relied upon. It sets out all changes relating to the policy context, and to new, permitted or demolished tall buildings in Reading. It undertakes the townscape assessment of each character area afresh, and comes to the same conclusion that the same eight character areas have some townscape capacity for tall buildings. It also goes through each of the same other considerations including an assessment of visual context based on updated analysis of each key view. Finally it again assesses the eight character areas with low or medium townscape sensitivity and considers whether these updates would change their level of suitability. No changes to the identified levels of suitability are proposed, and the conclusions of the Tall Buildings Strategy are therefore considered broadly up-to-date.

10.6.6 However, in reviewing the conclusions of the TBS and how it has been translated into policy, an issue has been identified with the degree to which the policy in the existing Local Plan fully reflects the conclusions of the evidence. This is set out in full in section 9 of the Update Note, and in conclusion the following issues are identified:

1. The tall buildings clusters in the adopted Local Plan (2019) do not exactly reflect the preferred tall building locations in the TBS; and
2. In the context of the high level of need for development, the areas identified as having 'moderate' suitability for tall buildings should no longer be subject to an entirely restrictive approach.

10.6.7 The proposed policy approach is therefore to identify these locations that the TBS identified as having some suitability for tall buildings but are not within existing clusters as 'areas of less suitability for tall buildings'. This reflects the fact that all of those areas have recognised sensitivities, either in terms of having been identified as having 'moderate' rather than 'high' suitability or they are in locations close to conservation areas, low density housing or areas of landscape significance. Section 9 of the Update Note therefore, when read in conjunction with the TBS, provides the justification for the differences between the identified clusters and the areas of less suitability.

10.6.8 The areas of less suitability for tall buildings differ from the rest of the borough outside the clusters because there remains a route to justifying a tall building in those locations, whereas policy would not allow for any tall buildings outside the clusters and areas of less suitability, as confirmed in criterion vi) of the policy. This policy has been firmly applied in recent years and no tall buildings outside those identified locations have been permitted. Within the areas of less suitability, the route to demonstrating the suitability of a tall building is through clear demonstration of compliance within the criteria of point vii), and that in overall terms the important cluster approach to tall buildings would not be undermined through consideration of all significant views.

10.6.9 The following options were identified and were subject to sustainability appraisal:

- Amended wording to identify 'areas of less suitability for tall buildings', and to specify that tall buildings will not be permitted outside the three identified clusters and areas of less suitability.
- Retain policy as existing

10.6.10 In terms of effectiveness, the approach is capable of being delivered over the plan period. The broad policy has been in place since the Reading Central Area Action Plan was adopted in 2009 and has proven to be effective in directing tall buildings to the three clusters and avoiding any tall building permissions outside the clusters. The proposed changes to identify the areas of less suitability will ensure continued effectiveness against a background of increased emphasis in national policy on provision of high density development in larger city and town centres and close to transport hubs by introducing additional flexibility.

10.6.11 The Statement of Common Ground with Historic England [EX014] agreed a change to the sixth bullet point of point vii) to better align the text with national policy in the NPPF, and this is included in Appendix 7 to this statement for completeness.

10.6.12 Representations from landowners and developers generally seek a relaxation of the policy approach, to either recognise the areas of less potential as being part of the clusters proper or to water down reference to tall buildings being unacceptable outside the identified locations. It is not agreed that this should be the case however, as the evidence in the TBS and Update Note still clearly points towards some areas being simply unsuitable for tall buildings and others having sensitivities that make them less suitable than the identified clusters where particular justification would be required.

10.6.13 A new safeguarding map has been produced for Heathrow Airport that would mean that the airport is a consultee for buildings over 150m in Central Reading. This requires reference in the supporting text through a main modification (Appendix 7). This is not expected to have any notable impact on the potential for tall buildings, which are almost always lower than this level.

10.7 Does Policy CR10 unnecessarily repeat other LPPU policies?

10.7.1 Point vii) of the policy includes a number of criteria for all tall buildings to consider. These criteria have been largely derived from the Tall Buildings Strategy [EV023] which sets out general principles in section 6.3 which have informed the criteria

10.7.2 A large number of the criteria are not set out anywhere else in the LPPU in the same or similar form, such as bullet points 1-3, 7-13, 14 and 15.

10.7.3 It is accepted that there is some overlap with policies such as EN1, CC7 and CC8 but where this is the case these are considered vital matters that, were they excluded from the policy, would be obvious omissions. A tall building would clearly need to be considered in terms of its impact on heritage assets for instance, and not to state this in a general list of criteria for tall buildings could result in an incomplete understanding of how tall buildings are to be addressed.

10.7.4 If CR10 does repeat other LPPU policies then this is an existing situation not affected by the update. There are no changes proposed to these criteria, and no changes to policies elsewhere in the LPPU would affect whether or not there is repetition in CR10.

10.8 Is Policy CR11 justified and effective?

10.8.1 Policy CR11 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.

10.8.2 The answer to this question focuses on the vision, main policy criteria and supporting text and excludes individual consideration of the sub-areas which are dealt with separately in Appendix 1 ([CR11a](#), [b](#), [c](#), [d](#), [e](#), [f](#), [g](#), [i](#)).

10.8.3 Much of the background to the Major Opportunity Area is set out within the City Centre Framework Update 2008, which has been added to the examination list as EX042. This identified the area (excluding CR11i which was a later addition) as having potential for a world-class mixed use destination as a gateway to the wider centre and identified the following, among others, as key matters to consider:

- A wide mix of uses that will encourage this area to become an important destination and vibrant central quarter
- New retail and leisure facilities on the ground floor to facilitate an expansion of the centre north of the railway
- Key north-south movement corridor
- More tranquil character close to the Thames
- New cluster of tall buildings, including the tallest buildings in Reading
- Permeable urban grain around the station
- Priority areas for improved streets and spaces immediately north and south of the station.
- Recognising the constraint of surrounding lower density residential areas.

10.8.4 The general elements of the policy largely remain unchanged from the existing policy in the adopted Local Plan, which was considered at examination stage and found to be justified, effective and consistent with national policy, subject to a main modification related to flood risk in the supporting text which was incorporated into the final adopted version. The Local Plan Review [LP011] in paragraphs 3.748 to 3.760 (pp 106-108) considers the need for an update, and identifies the following matters:

- Changes to the circumstances on individual sites, including the progress of development;
- Potential impacts of changing national policy, including on matters such as increasing densities in town centres; and
- An appeal decision that highlighted the need for updates regarding the north-south link and the issue of comprehensiveness.

10.8.5 The modifications that are now proposed to the policy are required for the reasons set out below:

- Inclusion of a reference to healthcare being an appropriate part of the mix in criterion i) as a reflection of the issues with healthcare capacity in central Reading and the potential for new development to make provision, in particular identified for CR11d.
- Reference in criterion ii) to direct north-south pedestrian and cycle links, which emerged from the appeal on 55 Vastern Road where the lack of a specific reference to direct links was a matter of contention around the intention of the policy. This is further clarified by a reference in criterion v) to visual links being provided for as much of the route as possible, again a matter that was subject to considerable discussion at appeal.
- Reference in criterion iv) to the need for enhanced bus priority measures on Vastern Road, which was a matter highlighted in the Sustainable Connectivity and Vehicle Trip Distribution Study [EV017] as a mitigation measure to enhance accessibility.
- Reference in criterion ix) to electricity infrastructure upgrades alongside water and wastewater, due to issues that have arisen over recent years with providing sufficient connection to the network. These are in the process of being resolved at a strategic level, but individual sites may require early discussion to avoid a significant lead-in time.
- Some wording in paragraph 5.4.10 to provide further clarity that being identified within a single sub-area does not require developments to come forward at the same time or under the same planning permission, as long as development has regard to the ability to develop the sub-area comprehensively.
- A new figure 5.3 which mainly updates to show the parts of the Major Opportunity Area that have recently been developed or are under construction, and any knock-on implications such as the alignment of key movement corridors. The key movement corridor in sub-area CR11e is also realigned to reflect the permissions that have been granted.

10.8.6 The alternative options that were considered and were subject to sustainability appraisal are as follows:

- Policy updated to reflect the status of development on allocated sites. Increase capacity levels for all sites.
- Wording amended to reflect wider scope of uses on ground floors.

10.8.7 The policy is expected to be capable of delivery over the plan period. Significant parts of the major opportunity area have already been delivered including Station Hill Phases 1 and 2 and Thames Quarter, whilst many others are under construction or have planning permission. The areas of the MOA that are unpermitted are now fairly limited, with the most significant such site being Napier Court (CR11i) for which there is a current planning application for the majority of the site. The policy has proven effective in managing development within the area and is expected to continue to do so.

10.9 Is Policy CR12 justified and effective?

10.9.1 Policy CR12 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.

10.9.2 The answer to this question focuses on the vision, main policy criteria and supporting text and excludes individual consideration of the sub-areas which are dealt with separately in Appendix 1 ([CR12a](#), [b](#), [c](#), [d](#), [e](#)).

10.9.3 Much of the background to the Major Opportunity Area is set out within the City Centre Framework Update 2008, which has been added to the examination list as EX042. This identified the area as a new mixed-use extension to the west of the centre, and noted the following, among others, as key matters to consider:

- A wide mix of uses with potential for more of a residential focus than the station area
- Active uses on the ground floor but not necessarily expanding the retail focus westwards
- New urban squares and public spaces
- Tall buildings focused on a limited number of slim, elegant towers
- Continuation of the larger block structure that is a feature of the area between Broad Street and Friar Street
- Key corridors of movement in an east-west direction across the IDR
- Need for inclusion of mass rapid transit proposal through the area.

10.9.4 The general elements of the policy largely remain unchanged from the existing policy in the adopted Local Plan, which was considered at examination stage and found to be justified, effective and consistent with national policy. The Local Plan Review [LP011] in paragraphs 3.761 to 3.771 (pp 109-110) considers the need for an update, and identifies the following matters:

- Changes to the circumstances on individual sites, including the progress of development and the award of funds for the Hexagon; and
- Potential impacts of changing national policy, including on matters such as increasing densities in town centres.

10.9.5 The modifications that are now proposed to the policy are required for the reasons set out below:

- Inclusion of a reference to healthcare being an appropriate part of the mix in criterion i) as a reflection of the issues with healthcare capacity in central Reading and the potential for new development to make provision, in particular identified for CR12a.
- Reference in criterion viii) to electricity infrastructure upgrades alongside water and wastewater, due to issues that have arisen over recent years with providing sufficient connection to the network. These are in the process of being resolved at a strategic level, but individual sites may require early discussion to avoid a significant lead-in time.

- Amended supporting text to reference the updated position on the Hexagon Theatre, which is that it will remain on site with an extension to incorporate a new auditorium, which now has planning permission.
- A new figure 5.4 which mainly updates to show the parts of the Major Opportunity Area that have recently been developed or are under construction, mainly in sub-area CR12b.

10.9.6 The alternative options that were considered and were subject to sustainability appraisal are as follows:

- Policy updated to reflect the status of development on allocated sites. Increase residential capacity on all sites, reduce retail capacity for Hosier Street (CR12e). Cattle Market site (CR12a) to be amended to residential development and no retail.
- Retain as existing, do not increase capacities.

10.9.7 The policy is expected to be capable of delivery over the plan period. There has been some development that has already taken place to implement parts of the policy, particularly within sub-area CR12b. Deliverability of the remaining sites is considered within Appendix 1. The policy has proven effective in managing development within the area and is expected to continue to do so.

10.10 Is Policy CR13 justified and effective?

10.10.1 Policy CR13 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.

10.10.2 The answer to this question focuses on the vision, main policy criteria and supporting text and excludes individual consideration of the sub-areas which are dealt with separately in Appendix 1 ([CR13a](#), [b](#), [c](#), [d](#)).

10.10.3 Much of the background to the Major Opportunity Area is set out within the City Centre Framework Update 2008, which has been added to the examination list as EX042. This identified the area as having potential to provide Reading's most desirable residential quarter, and noted the following, among others, as key matters to consider:

- A range of densities, increasing from the peaceful eastern corner of the site towards the city centre
- A structure of strongly articulated blocks and broad, well defined streets
- The prison as a key gateway site through Forbury Gardens with creative re-use
- A new urban park that provides a local focus for residents and connects to Forbury Gardens
- An informal, local square that provides local community and leisure activities near to Blake's Lock
- Main focus as residential with supporting community facilities
- One or two landmark buildings situated at street corners or other gateway sites

- Potential to enhance the setting of the Forbury Gardens, Abbey Ruins and St James' Church
- Key movement corridor across the IDR in an east-west direction
- Pedestrian links north under the railway line

10.10.4 The general elements of the policy largely remain unchanged from the existing policy in the adopted Local Plan, which was considered at examination stage and found to be justified, effective and consistent with national policy. The Local Plan Review [LP011] in paragraphs 3.772 to 3.782 (pp 110-112) considers the need for an update, and identifies the following matters:

- Changes to the circumstances on individual sites, including the progress of development; and
- Potential impacts of changing national policy, including on matters such as increasing densities in town centres.

10.10.5 The modifications that are now proposed to the policy are required for the reasons set out below:

- A modification to criterion i) to remove reference to medium density, as the area which would be most appropriate for medium density towards the east of the site (excluding the gas holder) has now been developed.
- Inclusion of a reference to healthcare being an appropriate part of the mix in criterion ii) as a reflection of the issues with healthcare capacity in central Reading and the potential for new development to make provision, in particular identified for CR13c.
- Reference in criterion x) to electricity infrastructure upgrades alongside water and wastewater, due to issues that have arisen over recent years with providing sufficient connection to the network. These are in the process of being resolved at a strategic level, but individual sites may require early discussion to avoid a significant lead-in time.
- New supporting text around the Prison, relating to the need to incorporate a cultural, heritage or leisure use (see site CR13a in Appendix 1).
- A new figure 5.5 which updates to show the parts of the Major Opportunity Area that have recently been developed or are under construction in sub-area CR13b and amendments to the key movement corridors to better align with and through the new development at Huntley Wharf.

10.10.6 In addition, the Statement of Common Ground with Historic England [EX014] identified a change to be made to criterion v) and to paragraph 5.4.28 of the supporting text to better reflect national policy and to support the proposed changes to Reading Prison (see site CR13a in Appendix 1). These changes are included for completeness in Appendix 7 here as proposed main modifications.

10.10.7 The alternative options that were considered and were subject to sustainability appraisal are as follows:

- Policy updated to reflect the status of development on allocated sites. Greater emphasis on Reading Prison to deliver cultural, heritage or leisure use. Increased residential capacities for all other sites
- Retain as existing

10.10.8 The policy is expected to be capable of delivery over the plan period. There has been some development that has already taken place to implement parts of the policy, particularly within sub-area CR13b. Deliverability of the remaining sites is considered within Appendix 1. The policy has proven effective in managing development within the area and is expected to continue to do so.

10.11 What rationale is there for deleting site allocations CR11h, CR14b, CR14c, CR14e, CR14f, and CR14k?

10.11.1 The rationale for deletion of each site is as follows:

- CR11h – Napier Road Junction: This site has been developed for 315 dwellings and was completed in 2022.
- CR14b – Former Reading Family Centre, North Street: This site has been developed for 37 dwellings and was completed in 2024.
- CR14c – 17-23 Queen Victoria Street: The upper floors of this building, to which the allocation applies, were converted to serviced apartments in 2021 and are no longer available for a residential use.
- CR14e – 3-10 Market Place, Abbey Hall and Abbey Square: Conversion of the upper floors of this site from office to 144 dwellings is currently underway under a prior approval and the allocation is no longer required.
- CR14f – 1-5 King Street: A change of use to offices and a restaurant was completed in 2020 and the site is no longer available for a residential use.

10.12 Is Policy CR15 justified and effective?

10.12.1 Policy CR15 relating to the Reading Abbey Quarter 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.

10.12.2 The background to the policy is that the site of the former Abbey, which forms the bulk of the identified Abbey Quarter, represents the best opportunity for Reading to draw on its history to promote visitors to the town, which would broaden the appeal of the centre and enhance Reading as a destination in line with the LPPU vision. Many of the works required have already been undertaken. The ruins of the Abbey, which had been closed in 2009, were conserved and reopened to the public in 2018, and the wider Reading Abbey Revealed project, which also included works to the Abbey Gateway, information boards and signage, a display at the museum and an events programme, was completed in 2021.

10.12.3 The policy has changed little from the adopted policy within the Local Plan, which was examined as part of the Local Plan and was found to be effective, justified and consistent with national policy. The Local Plan Review [LP011] in paragraphs 3,798-

3.806 (pp 114-115) considered the need for an update and identified that an update was only required in terms of the relationship with Reading Prison (CR13a), which forms the proposed update in the LPPU. The Reading Prison site offers a major opportunity to enhance the cultural and visitor facilities available within the Abbey Quarter and the wider town centre as a whole and the proposed updates are intended to ensure that any development at the prison complements the Abbey Quarter.

10.12.4 In the Statement of Common Ground with Historic England [EX014] some amendments to this policy were agreed to ensure that it would be effective. These are set out again in Appendix 7 for completeness.

Taking each of the following proposed site allocations CR11a – CR11g, CR11i, CR12a – CR12e, CR13a – CR13d, CR14a, CR14d, CR14g – CR14j, CR14l – CR14ab individually, respond to the following questions for each site as relevant:

10.13 What is the background to the site allocation? How was it identified and which options were considered?

10.13.1 Please see the schedules for each site in Appendix 1.

10.14 What is the basis for the scale, type, and use proposed? Is it justified?

10.14.1 Please see the schedules for each site in Appendix 1.

10.15 What is the site's status in terms of permissions or completions?

10.15.1 Please see the schedules for each site in Appendix 1.

10.16 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

10.16.1 Please see the schedules for each site in Appendix 1.

10.17 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

10.17.1 Please see the schedules for each site in Appendix 1.

10.17.2 Please note as a general comment, for unpermitted sites we generally assume delivery spread out across the whole period against which the site has been identified in figure 10.1 of the LPPU unless there are particular reasons to think otherwise. This is because few of the sites are large enough to be delivered in phases, and phased developments are very unusual in Reading in any case due to generally being brownfield sites built at a high density. Therefore, for instance, for a site identified for the long-term (2033-2041) we divide the total evenly across each of the eight years. Anything other than this would be largely guesswork at this stage and would lead to significant peaks and troughs in delivery that have no particular basis in evidence.

10.18 Are there any main modifications required to the allocation for soundness?

10.18.1 Please see the schedules for each site in Appendix 1.

Issue 2: Are the policies for South Reading justified, deliverable and consistent with national policy?

10.19 Is the strategy for South Reading justified?

10.19.1 The strategy for South Reading is justified. There is no specific evidence base document that underpins this approach, but the approach has broadly been the same since the Sites and Detailed Policies Document (SDPD, adopted 2012) which identified significant allocations in South Reading. The most important principle was the need for new development to not be in isolation from, but rather to link to and potentially enhance the services available to, the existing South Reading community which contains Reading's greatest concentration of deprivation.

10.19.2 The SDPD at the time included a specific vision for South Reading as well as a general policy on development principles, which stated that:

“Development will contribute to the provision of community services and facilities that properly integrate, in a physical sense and in terms of community infrastructure provision, with established residential areas, taking account of the socio-economic and environmental characteristics of South Reading.”

10.19.3 However, the policy was little used in practice and was not considered necessary for inclusion in the Local Plan, in particular given that many of the most major residential developments were already underway or had completed at that point (Kennet Island, Green Park Village, Worton Grange). Instead, the policy was reflected as key principle b in paragraph 6.2.1.

10.19.4 Improving the accessibility of South Reading sites is a key element of the strategy, because this is the location of Reading where new residential communities that result in expansion of the urban area has been taking place. There remain residential communities to be delivered as the Royal Elm Park planning permission (listed in the Housing Trajectory as Land at Madejski Stadium) and under policies SR2 and SR3. There are also very significant employment allocations. These all require service by enhanced public transport connections. The opening of the new Green Park station and elements of South Reading bus rapid transit are a key part of this, and bus rapid transit will continue to be delivered in phases as opportunities arise.

10.19.5 The other major element in South Reading is the location of proposals outside Reading's boundaries. At the time of drafting the Local Plan, the proposal was for Grazeley Garden Settlement, which would have delivered 15,000 homes on sites in Wokingham and West Berkshire, and this was highlighted on the map and in the relevant text. The Council was working closely with its neighbours on progressing this proposal. However, the expansion of the Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield in 2020 led to this proposal being abandoned, and Wokingham's Local Plan Update is now progressing the Loddon Valley Garden Village proposal, which would deliver 3,930 homes. This is to the south east of Reading and slightly further away from the Borough's boundaries. It would provide its own local services

and facilities, but connections into Reading are key and the Council is continuing to work with Wokingham Borough Council on understanding these connections.

10.19.6 The extension of the DEPZ for AWE Burghfield is a major constraint on development in South Reading, and it covers the whole area that falls both west of the A33 and south of the Kennet & Avon Canal. This is significant enough to be reflected in the key principles. An additional Statement of Common Ground [EX045] has been signed between the Council and West Berkshire District Council and the Office for Nuclear Regulation covering matters around policy OU2 and this includes agreement of insertion of an additional key principle and supporting text in the strategy for South Reading, which is included for completeness in Appendix 7.

10.19.7 In paragraph 6.2.4, figures are included for the level of development that South Reading is expected to accommodate. These have been derived from the Housing and Economic Land Availability Assessment (HELAA) [EX015] and reflect the assessed capacity of South Reading sites, rather than being determined at a strategic level first and then sites found to meet it. This is necessitated by the need to develop suitable sites where they arise rather than there being significant development options within the Borough boundaries. As such, they are an approximate guide to the scale of development rather than being a hard and fast expectation. For housing, the amended version of the Housing Trajectory [EX041] now includes details on which permissions and allocations are within which area of Reading and have therefore contributed towards these totals. The totals also include an allowance for small site windfalls based on previous levels of completions in each area of Reading as well as an allowance for Local Authority New Build, split between south and west Reading. A main modification is proposed to this paragraph to reflect the completions in 2024-25 and is set out in Appendix 7.

10.20 Is Policy SR1 justified and effective?

10.20.1 Policy SR1 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.

10.20.2 The answer to this question focuses on the vision, main policy criteria and supporting text and excludes individual consideration of the sub-areas which are dealt with separately in Appendix 2 ([SR1a](#) and [c](#)).

10.20.3 The general elements of the policy largely remain unchanged from the existing policy in the adopted Local Plan, which was considered at examination stage and found to be justified, effective and consistent with national policy subject to a main modification relating to a comprehensive approach to access and the need to refer to the top of the bank of the river, which were incorporated into the adopted policy and are not proposed to be amended. The Local Plan Review [LP011] in paragraphs 3.815 to 3.824 (pp 115-117) considers the need for an update, and identifies the following matters:

- Changes to the circumstances on individual sites, including the progress of development; and
- The potential need to amend allocations to help to meet employment needs.

10.20.4 The main background to the continued need to identify this site comes from the identification of increased levels of need for industrial and warehouse, as well as research and development space, within the Commercial Needs Assessment [EV006]. The level of need it identifies and which underpins policy EM1 has increased from 148,440 sq m to 167,113 sq m. This is the only location in Reading which can realistically meet a large proportion of these needs, estimated through the HELAA as being capable of meeting around 85% of the needs in a location which is highly accessible to the strategic road network and is expected to be available in the plan period. Without the sites in SR1, Reading would be in a position where it cannot meet its employment needs and would need to discuss the potential for needs to be met elsewhere with its neighbours, some of whom (West Berkshire and Bracknell Forest) are already in a position where they have adopted Local Plans which do not meet their own needs in full. This is therefore a critical allocation to retain.

10.20.5 The modifications that are now proposed to the policy are required for the reasons set out below:

- A modification to the first paragraph to remove the references to specific floorspace, which is a duplication of what is already set out in the sub-area policies, and to expand the acceptable uses to include research and development in line with the results of the Commercial Needs Assessment.
- Reference in criterion v) to priority habitats which are outside or along the eastern fringe of the site.
- A new criterion ix) in reference to the Detailed Emergency Planning Zone for AWE Burghfield which was expanded to cover the site in 2020 and will be an important consideration relating to this site and which is addressed in more detail for sites [SR1a](#) and [SR1c](#) in Appendix 2.
- Reference in criterion x) to electricity infrastructure upgrades alongside water and wastewater, due to issues that have arisen over recent years with providing sufficient connection to the network. These are in the process of being resolved at a strategic level, but individual sites may require early discussion to avoid a significant lead-in time.
- An update in paragraph 6.3.1 to note that this is identified in the Joint Central and Eastern Berkshire Minerals and Waste Plan [OP005] for 'activities requiring enclosed industrial premises (small scale)', in common with many of Reading's other employment areas. These activities would fall within the broad industrial and warehouse categories and would not be in addition to the floorspace needs identified in relation to EM1, meaning that the allocation is compatible with the minerals and waste plan.
- An updated map to show the development that has already been carried out and remove reference to sub-area SR1b which would be deleted.

10.9.6 The alternative options that were considered and were subject to sustainability appraisal are as follows:

- Updates to show where parts of the allocation have been completed, and update indicative capacity for new development. Include consideration for accommodation within the Off-Site Emergency Plan for AWE Burghfield.

- Retain as existing

10.9.7 The policy is expected to be effective over the plan period. The landowners of the majority of SR1a are actively seeking to bring forward a development in line with the policy, whilst the SR1c site is cleared and freehold owned by the Council with an option to a developer. Deliverability of these sites is considered in more detail in the site schedules in Appendix 2.

10.9.8 The DEPZ issue now identified does present an additional constraint on development. However, the Council is confident that this can be overcome for an employment development by ensuring an appropriate emergency plan that complements the Off-Site Emergency Plan is in place and that includes arrangements for sheltering in an appropriate space on site. In the case of SR1c the baseline position of a planning permission for 73,000 sq m of offices must also be taken into account.

10.21 Is Policy SR2 justified and effective?

10.21.1 Policy SR2 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.

10.21.2 The answer to this question focuses on the vision, main policy criteria and supporting text and excludes detailed consideration of the site which is dealt with [separately](#) in Appendix 2.

10.21.3 The general elements of the policy largely remain unchanged from the existing policy in the adopted Local Plan, which was considered at examination stage and found to be justified, effective and consistent with national policy. The Local Plan Review [LP011] in paragraphs 3.825 to 3.832 (p 117) did not identify any particular updates required to the policy, but the subsequent HELAA did result in some updates being proposed.

10.21.4 In terms of background, this area was identified through the Employment Area Analysis [EV010] process as no longer being required to be retained in employment use, containing a significant amount of offices with limited occupancy and in a non town centre or business park location as well as large warehouses with restricted access to the strategic road network. As such it represents an excellent opportunity to not only deliver a significant amount of homes but to also connect the recent Kennet Island development of more than 1,000 homes into the wider South Reading community.

10.21.5 The modifications that are now proposed to the policy are required for the reasons set out below:

- Changes to the boundary of the Major Opportunity Area that emerged through the HELAA process to remove two sites where the form of development that has already taken place to expand the district centre would restrict the ability of those sites to be developed for residential. In the case of the Micro Centre site, the retention of these small units would also negate the need for them to be replaced elsewhere within the allocation.

- A modification to the first paragraph to remove the references to dwellings, which is a duplication of what is already set out at the end of the policy.
- A revised reference to community uses in the first paragraph that references the potential for inclusion of healthcare infrastructure in a site of this scale.
- An amendment to criterion v) to remove reference to non-residential uses (which would have been intended to replace the Micro Centre and is not therefore any longer necessary) as the buffer to neighbouring employment uses, and reference instead to an appropriate buffer which could include landscaping.
- A revised map to show the implications of the change to the boundary.

10.21.6 In terms of effectiveness, this is better considered in terms of assessing the deliverability of the site in Appendix 2.

10.22 What rationale is there for deleting site allocations SR1b and SR4f?

10.22.1 The rationale for deletion of each site is as follows:

- SR1b – North of Island Road: This site has been developed for 11,067 sq m of industrial and warehouse use and was completed in 2019.
- SR4f – Land South West of Junction 11 of the M4: This is explained in paragraph 3.842 of the Local Plan Review 2023 [LP011]. It was part of the wider Grazeley garden settlement proposal for up to 15,000 homes that fell mainly in Wokingham and West Berkshire. Masterplanning work at the time indicated that the small area of land within Reading would have been part of the area dedicated to employment uses. However, the extension of the Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield led to this proposal being abandoned and removed from the emerging local plans. The land in Reading Borough is not capable of being developed on its own as it is a part of a field without any road access within the Borough, and it sits within the DEPZ.

10.23 Is Policy SR5 justified and effective?

10.23.1 Policy SR5 relating to the Kennet Meadows 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.

10.23.2 Most of the text of the policy remains in place from the existing Local Plan, which was examined and found to be effective, justified and consistent with national policy, subject to a main modification to refer to the operation of the Water Treatment Works which was incorporated into the adopted plan. The Local Plan Review in paragraphs 3.853 to 3.861 (pp 120-121) considers the need for an update and identifies only the potential implications of proposals to create further wetland at Kennet Meadows on any other Kennetside proposals, and this forms the basis for the LPPU amendment.

10.23.3 In terms of the change, this stems from Action W14 (p45) in the Climate Emergency Strategy [OP004] which is to *“Improve the resilience of the Kennet Meadows”*. This is further described as the following:

- *“Develop a plan for the Kennet Meadows to make it a resilient wetland*
- *Make sure the plans preserve the need for the meadows to act as flood plain*
- *Consider the drought risk and make sure the needs of the meadows are considered in EA / TW drought plans. There will be a limit to their protection... is it possible to develop a recovery plan early to try and mitigate?”*

10.23.4 This proposal is also highlighted in the Biodiversity Action Plan [OP008]. Objective F6 (p35) is to *“maximise the wildlife value of the Kennet Valley East BOA”*, and the specific action is to *“raise the water levels in Fobney Meadow”*.

10.23.5 The targets in the Climate Emergency Strategy were to hold a workshop in 2021 and to develop a plan by 2023, and the 2023 date is also reflected in the Biodiversity Action Plan. The plan has not been put in place yet. but the Council are actively investigating the possibility of this being a project to provide Biodiversity Net Gain credits, as the Council owns the freehold of a significant amount of land in the meadows. This has included liaison with the other major landholder of the part of the meadows within Reading Borough, and it is considered realistic that a plan can be put in place during the plan period, and for this reason the updated policy is considered to be effective.

10.23.6 The remainder of the policy is mainly about identifying possible opportunities, but there are no current proposals other than that described above, and none on the two sites identified in the policy. These sites would not deliver any wider development needs other than enhancing the role of the meadows, and it is possible that they will not be delivered in the plan period, but it is nevertheless considered important to have a policy that supports such proposals if they were to come forward.

10.23.7 The options considered for this policy were as follows:

- SR5(i) – To state that works to create a resilient wetland in the Kennet Meadows will be supported subject to impact on flood risk and biodiversity.
- SR5(ii) – To ensure proposals do not have an adverse impact on biodiversity, flood risk, landscape, etc., but to not incorporate aims of Biodiversity Action Plan or Reading Climate Emergency Strategy.

10.23.8 The Kennet Meadows spans the boundary with West Berkshire, and the Council’s approach to the LPPU has been subject to liaison under the duty to co-operate. The importance of the Kennet Meadows is reflected in the Statement of Common Ground with West Berkshire District Council (Appendix 7 to the Duty to Co-operate Statement [EX001]).

Taking each of the following proposed site allocations SR1a, SR1c, SR2, SR3, SR4a – SR4e and SR4g – SR4l individually, respond to the following questions for each site as relevant:

10.24 What is the background to the site allocation? How was it identified and which options were considered?

10.24.1 Please see the schedules for each site in Appendix 2.

10.25 What is the basis for the scale, type, and use proposed? Is it justified?

10.25.1 Please see the schedules for each site in Appendix 2.

10.26 What is the site's status in terms of permissions or completions?

10.26.1 Please see the schedules for each site in Appendix 2.

10.27 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

10.27.1 Please see the schedules for each site in Appendix 2.

10.28 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

10.28.1 Please see the schedules for each site in Appendix 2. Please also see the comments in 10.17.2.

10.29 Are there any main modifications required to the allocation for soundness?

10.29.1 Please see the schedules for each site in Appendix 2.

West Reading and Tilehurst

Issue 3: Are the policies for West Reading and Tilehurst justified, deliverable and consistent with national policy?

10.30 Is the strategy for West Reading and Tilehurst justified?

10.30.1 The strategy for West Reading and Tilehurst is justified. There is no specific evidence base that underpins the strategy, and it is largely a reflection of the relatively modest level of development planned in the area and the nature of the constraints. This includes the areas of landscape importance, the presence of both of the major rivers and the important existing employment areas. The main significant opportunities that have been identified are for the major improvements to the Meadway district centre (WR30) to better serve its community and for some regeneration and renewal of existing residential areas. The planned improvements of Tilehurst station and the opportunities for park and ride corridors connecting to sites that would need to be delivered outside the Borough are also reflected.

10.30.2 The strategy for the area also notes the possibility of strategic developments coming forward outside the Borough boundaries. West Berkshire's Local Plan is now adopted and contains no such proposals, but there have been possibilities investigated in the past around the M4 south of the Kennet, and as this is not within the LPPU's control it is worth noting the possibility of these arising in the plan period and ensuring that infrastructure links into Reading are enhanced.

10.30.3 In paragraph 7.2.4, figures are included for the level of development that West Reading and Tilehurst is expected to accommodate. These have been derived from the Housing and Economic Land Availability Assessment (HELAA) [EX015] and reflect the assessed capacity of West Reading and Tilehurst sites, rather than being

determined at a strategic level first and then sites found to meet it. This is necessitated by the need to develop suitable sites where they arise rather than there being significant development options within the Borough boundaries. As such, they are an approximate guide to the scale of development rather than being a hard and fast expectation. For housing, the amended version of the Housing Trajectory [EX041] now includes details on which permissions and allocations are within which area of Reading and have therefore contributed towards these totals. The totals also include an allowance for small site windfalls based on previous levels of completions in each area of Reading as well as an allowance for Local Authority New Build, split between south and west Reading. A main modification is proposed to this paragraph to reflect the completions in 2024-25 and is set out in Appendix 7.

10.31 Is Policy WR2 justified and effective?

10.31.1 Policy WR2 is not within the scope of the LPPU as confirmed in table A1.1 of the Council's Response to Initial Questions Part 1, July 2025 [EX002]. The only amendment proposed is a deletion of the reference to a Playing Pitches Strategy which has now been superseded, and in our view this would constitute a minor modification.

10.31.2 The policy was examined as part of the Local Plan and the Inspector's Report considered that, subject to a main modification to refer to early years provision being provided which was incorporated into the final version, the policy will be effective,. The Local Plan Review [LP011] considers the need for update in paragraphs 3.870-3.877 (pp 121-122) and concludes that the policy remains up-to-date.

10.31.3 The background to the policy is that primary school provision in the area was split between the Park Lane Primary School site and annexe, the Laurels site and the Downing Road Playing Field site. This meant a need for children to move between sites during the school day, and the existing premises are also not entirely suited to modern education needs. There is a long-term aspiration to consolidate provision onto a single site, and in doing so there may be opportunities for sites to become available for a residential use. This is set out in greater detail in the supporting text to policy WR2.

10.31.4 There has not been any progress on this proposal since the Local Plan was adopted. At Local Plan Review stage, officers liaised with colleagues in the Council's Education service on whether this policy was still required, and it was considered to still be a relevant long-term aspiration but without any immediate plans to implement it. It was therefore excluded from the scope of the update. The housing provision figures in the HELAA, housing trajectory and policy H1 do not include any provision from any of these sites. Should the proposal proceed then the policy will be effective by clearly setting out the facilities expected to be provided on the site and the requirements for what should be demonstrated as part of any proposal for residential development.

10.31.5 The only representation received on this site expresses concern about primary school provision in the area. The proposal itself would not be expected to result in any change in primary school places. In terms of the impact of any residential development, the Infrastructure Funding Statement [EV004] confirms that there is

expected to be a surplus of primary places across the Borough and sufficient capacity to meet any increase in demand across the plan period (see pp 33-34).

10.32 What rationale is there for deleting site allocations WR3a, WR3c - WR3e, WR3m and WR3q?

10.32.1 The rationale for deletion of each site is as follows:

- WR3a – Former Cox & Wyman Site, Cardiff Road: This site has been developed for 96 dwellings and was completed in 2023.
- WR3c – 28-30 Richfield Avenue: An extension and refurbishment of the existing car dealership was carried out in 2020 and the site is no longer considered to be available for residential use.
- WR3d – Rivermead Leisure Centre, Richfield Avenue: A new leisure centre in line with the policy was completed in 2024.
- WR3e – Yeomanry House, Castle Hill: Planning permission was granted for use of this listed building for a nursery and offices. Although the permission remains unimplemented, it is not considered that the site would be available for a residential use and the move of the nursery to this site frees up site WR3y.
- WR3m – 103 Dee Road: Development of the site for 54 dwellings is under construction, and is likely to have been completed by the time of adoption.
- WR3q – Norcot Community Centre, Lyndhurst Road: This site has been developed for 18 dwellings and community use and was completed in 2023.

Taking each of the following proposed site allocations WR3b, WR3f - WR3l, WR3n - WR3p, and WR3r - WR3y individually, respond to the following questions for each site as relevant:

10.33 What is the background to the site allocation? How was it identified and which options were considered?

10.33.1 Please see the schedules for each site in Appendix 3.

10.34 What is the basis for the scale, type, and use proposed? Is it justified?

10.34.1 Please see the schedules for each site in Appendix 3.

10.35 What is the site's status in terms of permissions or completions?

10.35.1 Please see the schedules for each site in Appendix 3.

10.36 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

10.36.1 Please see the schedules for each site in Appendix 3.

10.37 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

10.37.1 Please see the schedules for each site in Appendix 3. Please also see the comments in 10.17.2.

10.38 Are there any main modifications required to the allocation for soundness?

10.38.1 Please see the schedules for each site in Appendix 3.

Site-specific questions

10.39 What is the current situation with regard to Local Wildlife Site status for sites WR3s and WR3t? Please provide mapping of each site to indicate how the Local Green Space designation would overlap with any area being assessed for Local Wildlife Site status.

10.39.1 The current situation is that the Land at Kentwood and Armour Hills remains a proposed Local Wildlife Site according to Thames Valley Environmental Records Centre (TVERC)¹ and a determination has not yet been made about whether they should be recognised as such or not. A draft report dating from June 2025 has been seen by the Council but this was a confidential interim version only, it is not considered appropriate to include here.

10.39.2 A map showing the existing allocations, existing Local Green Space, proposed Local Green Space, proposed revised allocation boundary (WR3s only) and the proposed Local Wildlife site is in Figure 1.

Figure 1: Location of proposed Local Wildlife Site and amendments to Local Green Space and allocation boundary



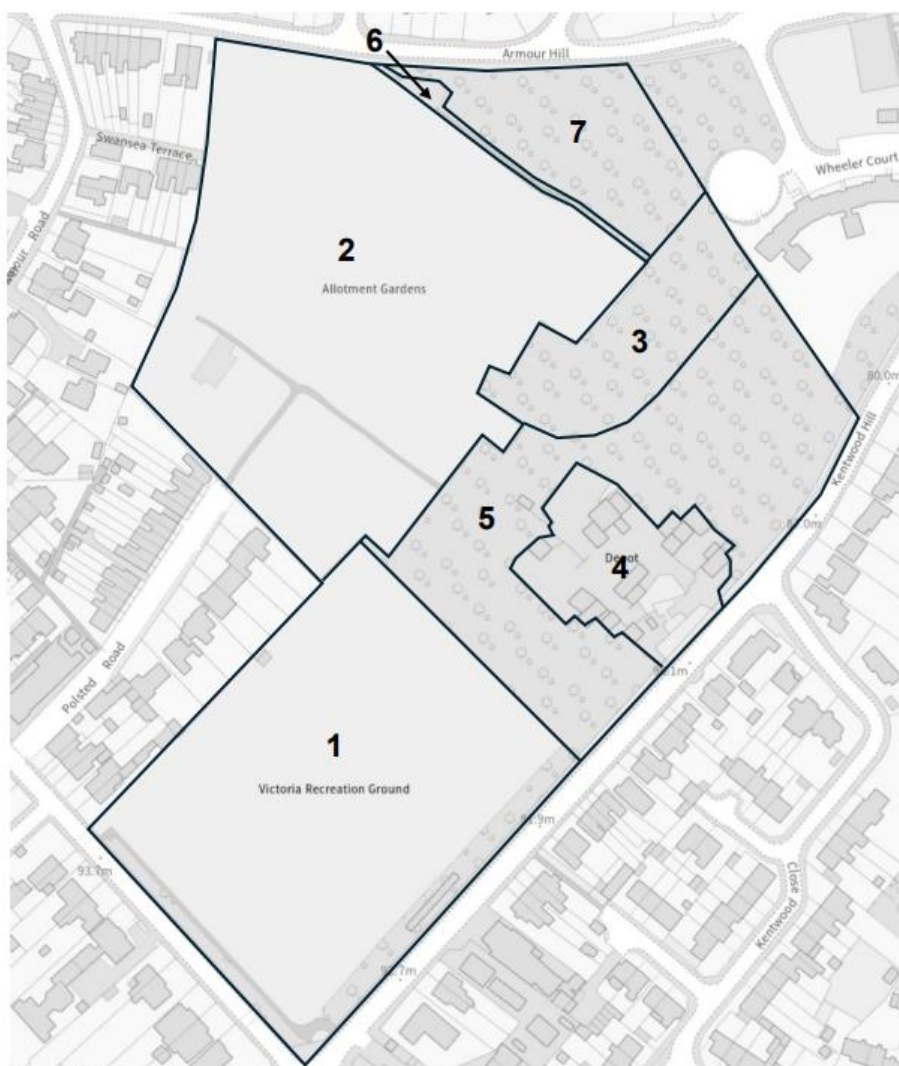
¹ [Reading list 2025 v1.pdf](#)

10.40 Are the site allocations WR3s and WR3t justified and effective?

10.40.1 The allocations WR3s and WR3t are justified in that they are an appropriate strategy, taking into account the reasonable alternatives, and based on robust and proportionate evidence. They are also effective in that they are deliverable over the plan period.

10.40.2 In order to understand the background to the allocations and their justification it is necessary to recap some of the history of the allocations. To do so it is vital to understand the different elements of the Tilehurst People's Local Charity ownership which are summarised in Figure 2 below.

Figure 2: Elements of the TPLC ownership



10.40.3 The elements are as follows:

1. The Victoria Recreation Ground, owned by TPLC and leased to the Council
2. In-use allotments
3. The copse known as The Withies, previously identified as having particular biodiversity value

4. Builders yard
5. Former allotments and other undeveloped land
6. The allotments car park and access track
7. Undeveloped land

10.40.4 There is a long history to the land, but the history of most relevance to this question began with the submission of the land as a suggested inclusion in the Sites and Detailed Policies Document (adopted October 2012). The suggestion was made early in 2008, and the site boundary contained all of the land shown above, but the proposal was for development of the land broadly shown as 4, 5, 6 and 7 (which correspond broadly to the two existing allocations) for 60-70 homes and protection of the remainder. In the submitted version of the SDPD in July 2011, the Council only identified development of the builders yard (4) for 10-16 dwellings and the remainder was proposed to be protected as 'public and strategic open space'. An extract from the proposals map at submission stage is in Figure 3.

Figure 3: Extract from SDPD Proposals Map (submission version)



10.40.5 Following examination, the Inspector at the time did not consider this approach to be justified. The Inspectors Report concluded as follows:

“106. Both the site allocated in the SDPD and the enlarged site advanced by the site owner would result in piecemeal and uncoordinated development that is not well related to the surroundings. This would be contrary to the National Planning Policy Framework which makes it clear in paragraphs 16 and 17 that local plans should set out a positive vision for the future of the area. At present the builders’ yard, which it is understood does not cause significant problems for the neighbourhood, is set behind green corrugated iron fencing and appears relatively inconspicuous from the surrounding area. Set amidst unused/overgrown land and allotments it does not appear unduly intrusive or out of place. In contrast a housing scheme on the allocated site would be much more prominent and appear stark and incongruous given the open nature of the surrounding land. Consequently the existing arrangement of land uses is to be preferred in terms of their environmental impact.”

107. *The designation of the allotments area as open space (excluding the established builder's yard) on the Proposals Map will provide clear policy protection for this area under the terms of Policy SA16. The Council may wish in the future to consider a more comprehensive approach that deals with all the land between Kentwood Hill and Armour Hill (including the builder's yard, unused land, the allotments and playing field) having regard to the needs of the area. However this is not matter that requires endorsement in the DPD given that it has been found that the current disposition of land uses in the area is acceptable.*

108. *In summary as the allocation of Land at Kentwood Hill within Policy SA8 is not justified by the evidence and contrary to national planning policy it should be deleted. The deletion is set out in MM3, MM4 and MM7 and addresses my concerns about this matter."*

10.40.6 The builders yard allocation was therefore deleted in the adopted version of the SDPD. The remainder was protected as proposed.

10.40.7 The land was once again submitted through the call for sites exercise for the Local Plan in January 2014. Two alternative options were submitted. The first was development of the land approximately covered by 4 and the western half of 5 for around 45 dwellings. The second was development of the whole TPLC ownership for 200-250 dwellings and community leisure space.

10.40.8 At Local Plan stage, the HELAA was used to consider potential site allocations. The whole TPLC ownership was considered as a single site, but through the suitability analysis, the site was reduced down to two separate sites made up of parts 4 and 5 (which became WR3s) and 6 and 7 (which became WR3t). The exclusions that had been made at this stage were due to biodiversity significance, protected trees and landscape significance (part 3) and to retain important recreational, leisure and community uses (parts 1 and 2). As part of this, the approach intended to address the points of the SDPD Inspector in terms of a comprehensive approach and deliver sites which were of a sufficient size to avoid being piecemeal development and would be able to provide sufficient landscaping to not appear incongruous. The comprehensive approach proposed also involved protecting all land not identified for development as local green space. Following examination of the Local Plan, this approach was agreed by the Inspector who considered that *"With the requirements as set out, these would be effective in mitigating any adverse impacts, and the allocation of the two sites is therefore justified"* and the Local Plan was adopted with sites WR3s and WR3t.

10.40.9 At the Call for Sites stage as part of the LPPU in 2023, local residents suggested that the existing allocations should be instead protected as local green space. The Consultation on Scope and Content [LP008] therefore asked a specific question on this matter (Q15 and paragraphs 6.10-6.12, pp 27-28). Following this, the land was put forward to TVERC as a local wildlife site. There was also ecological information made available to the Council that was undertaken on behalf of the landowner's development partner that showed that the eastern part of site WR3s contains a protected species. These were the two main matters that were identified as having changed.

- 10.40.10 The Council considers that most of the rationale for the inclusion of the sites at Local Plan stage remains in place. There continues to be a very high level of need for new housing, in particular for the family housing which these sites in a suburban location are in a position to provide. Site WR3t and the retained part of WR3s do not contain any in-use allotments, any land to which there is officially public or community access (other than the allotments car park and track) or any land which to date has any particular identified biodiversity value. Any impacts on landscape or visual amenity are considered to be capable of mitigation through landscaping. Other issues and constraints identified would not preclude development and could be incorporated within or addressed as part of development.
- 10.40.11 However, the presence of a species protected by law on part of the WR3s site does preclude its development. This part of the site is therefore proposed to be removed from the allocation. Whilst this does reduce the size of the site, it still results in a larger and more regularly shaped WR3s site than the development purely of the builders yard that was rejected by the SDPD Inspector as being piecemeal development, and the site remains large enough to incorporate appropriate landscaping to mitigate its visual impacts.
- 10.40.12 The pending proposal for Local Wildlife Site (LWS) status also needs to be taken into account. The Local Plan policy position is quite clear on this, both in existing and proposed amended policy EN12, that the green network, including LWSs, should be maintained, protected, consolidated, extended and enhanced. Development would not be permitted for development that negatively affects these sites. The LPPU does not include any other development proposals that would result in the loss of a LWS, and doing so would be inconsistent with the Council's policy position. Based on previous ecological advice on the sites and having been unable to gain access to the land to update this advice, the Council does not have sufficient justification to remove the sites from the plan, but as the LWS matter had not been concluded at the point that the Pre-Submission consultation was undertaken, and remains unresolved, the appropriate approach was considered to be to make the allocation contingent on not being identified as a LWS.
- 10.40.13 More detail on the sites themselves is set out in Appendix 3.
- 10.40.14 The approach is considered to be effective in that it will be capable of being delivered over the plan period. The sites are available for development now, and only have the builders yard as an existing use, so could be brought forward relatively quickly. The LWS issue should be resolved at the point that any application is determined, and even if not there will need to be more detail provided on the ecological value of the site to enable a decision to be made.

Caversham and Emmer Green

Issue 4: Are the policies for Caversham and Emmer Green justified, deliverable and consistent with national policy?

10.41 Is the strategy for Caversham and Emmer Green justified?

- 10.41.1 The strategy for Caversham and Emmer Green is justified. There is no specific evidence base that underpins the strategy, and it is largely a reflection of the relatively modest level of development planned in the area and the nature of the constraints. This includes the needs for better connections between Caversham and central Reading, in terms of pedestrians, cyclists and public transport, the latter of which is dependent on the wider Cross Thames Travel project within the Transport Strategy 2040 and policy TR2, as well as the provision of park and ride mobility hubs which would need to be on sites outside the Borough. The areas of landscape importance both within the area and outside it, where the Chilterns National Landscape meets the Borough boundary, are also reflected.
- 10.41.2 In paragraph 8.2.3, figures are included for the level of development that Caversham and Emmer Green is expected to accommodate. These have been derived from the Housing and Economic Land Availability Assessment (HELAA) [EX015] and reflect the assessed capacity of Caversham and Emmer Green sites, rather than being determined at a strategic level first and then sites found to meet it. This is necessitated by the need to develop suitable sites where they arise rather than there being significant development options within the Borough boundaries. As such, they are an approximate guide to the scale of development rather than being a hard and fast expectation. For housing, the amended version of the Housing Trajectory [EX041] now includes details on which permissions and allocations are within which area of Reading and have therefore contributed towards these totals. The totals also include an allowance for small site windfalls based on previous levels of completions in each area of Reading. A main modification is proposed to this paragraph to reflect the completions in 2024-25 and is set out in Appendix 7.

10.42 Is Policy CA1 justified and effective?

- 10.42.1 Policy CA1 is justified and effective. This is considered in relation to each of the individual sites within it in questions 10.45-10.50 below.

10.43 What rationale is there for deleting site allocations CA1b and CA1g?

- 10.43.1 The rationale for deletion of each site is as follows:
- CA1b – Part of Reading Golf Club, Kidmore End Road: The allocation was made for part of the golf club land which would enable the golf club to build a new clubhouse and remain on the site. However, the golf club moved off site and permission was granted for the development of the whole golf club land that falls within Reading Borough for 223 dwellings. This development is currently underway with 72 dwellings completed by the end of 2024-25.

- CA1g – Land West of Henley Road Cemetery: This land has been brought into the cemetery in accordance with the allocation since the Local Plan was adopted and the allocation is no longer required.

10.44 Is Policy CA2 justified and effective?

10.44.1 Policy CA2 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 [EX002].

10.44.2 The policy was examined as part of the Local Plan, and the Inspector's Report concluded that the policy would be justified and effective subject to a main modification to have regard to other suitable use compatible with the site's heritage, and that reinstatement of historic public footpaths may be appropriate and to clarify that development should not detract from the character and appearance of the landscape or negatively affect significant trees. These modifications were incorporated into the adopted version.

10.44.3 The policy was considered in the Local Plan Review [LP011] in paragraphs 3.905-3.912 (pp 125-126) and no requirement to update it was identified.

10.44.4 As an update regarding this site, in 2024 the Council resolved to grant planning permission to application 22/0409 that would result in a conversion of Caversham Park for assisted living and erection of a care home, age-restricted retirement dwellings, affordable housing and refurbishment and extension of pavilion, sports provision of two croquet lawns and two bowling greens and other works, subject to the completion of a Section 106 agreement. Work on finalising the agreement is continuing. Until development commences on the site, the Council considers that it is necessary to retain the policy to ensure that any potential subsequent or revised applications are judged against the important points made in CA2.

10.44.5 Policy CA2 was critical in determining this application and therefore arriving at a development proposal that was considered acceptable in principle taking into account the substantial heritage importance of the site and which meets the policy requirements. As a result, it has already proven to be effective through the development management process.

Taking each of the following proposed site allocations CA1a, CA1c - CA1f, and CA1h individually, respond to the following questions for each site as relevant:

10.45 What is the background to the site allocation? How was it identified and which options were considered?

10.45.1 Please see the schedules for each site in Appendix 4.

10.46 What is the basis for the scale, type, and use proposed? Is it justified?

10.46.1 Please see the schedules for each site in Appendix 4.

10.47 What is the site's status in terms of permissions or completions?

10.47.1 Please see the schedules for each site in Appendix 4.

10.48 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

10.48.1 Please see the schedules for each site in Appendix 4.

10.49 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

10.49.1 Please see the schedules for each site in Appendix 4. Please also see the comments in 10.17.2.

10.50 Are there any main modifications required to the allocation for soundness?

10.50.1 Please see the schedules for each site in Appendix 4.

East Reading

Issue 5: Are the policies for East Reading justified, deliverable and consistent with national policy?

10.51 Is the strategy for East Reading justified?

10.51.1 The strategy for East Reading is justified. There is no specific evidence base that underpins the strategy, and it is largely a reflection of the relatively modest level of development planned in the area and the nature of the constraints, but also the significance of the two major institutions in the area, the Royal Berkshire Hospital and the University of Reading, where development to fulfil the needs of those institutions is likely to continue at least across most of the plan period, with any move of the hospital off site likely to be towards the end of the plan period or after. The major constraint on the area is its concentrations of heritage assets, with multiple conservation areas, registered parks and gardens and listed buildings located in the area. Conservation area appraisals continue to be carried out for these areas, and in some cases lead to extensions of the areas, as was recently the case for the Christchurch Conservation Area.

10.51.2 In paragraph 9.2.4, figures are included for the level of development that East Reading is expected to accommodate. These have been derived from the Housing and Economic Land Availability Assessment (HELAA) [EX015] and reflect the assessed capacity of East Reading sites, rather than being determined at a strategic level first and then sites found to meet it. This is necessitated by the need to develop suitable sites where they arise rather than there being significant development options within the Borough boundaries. As such, they are an approximate guide to the scale of development rather than being a hard and fast expectation. For housing, the amended version of the Housing Trajectory [EX041] now includes details on which permissions and allocations are within which area of Reading and have therefore contributed towards these totals. The totals also include an allowance for small site windfalls based on previous levels of completions in each area of Reading. A main modification is proposed to this paragraph to reflect the completions in 2024-25 and is set out in Appendix 7.

10.52 What rationale is there for deleting site allocations ER1a, ER1f - ER1h and ER1j?

10.53.1 The rationale for deletion of each site is as follows:

- ER1a – The Woodley Arms PH, Waldeck Street: This site has been developed for student accommodation comprising 38 bedspaces, and was completed in 2025.
- ER1f – Hamilton Centre, Bulmershe Road: This site was extended and converted for a special educational needs college in 2022 and is no longer available for residential use.
- ER1g – Alexander House, Kings Road: This site is currently being converted and extended for 43 dwellings and is nearing completion.
- ER1h – Arthur Hill Swimming Pool, 221-225 Kings Road: This building has been converted and extended for 15 dwellings and was completed in 2023.
- ER1j – Palmer Park Stadium Area: A new leisure centre on this site as an extension to the existing stadium in line with the allocation was completed in 2023.

10.53 Is Policy ER2 justified and effective?

10.53.1 Policy ER2 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.

10.53.2 Much of the text of policy ER2 remains unchanged from the existing Local Plan, which was examined and found to be justified and effective, subject to a main modification which was incorporated into the adopted version. The Local Plan Review 2023 [LP011] at paragraphs 3.927-3.934 (pp 128-129) assesses the need for update in the context of changes since adoption, and identifies the need for updates solely in relation to:

- Changes to permitted development rights that allow for considerable levels of development without requiring planning permission; and
- The need to work proactively with the University on the latest position on the future of the campus.

10.53.3 In practice, when considering how the policy should be updated, the changes to permitted development rights did not require any changes, as it will only be capable of being applied in situations where permission is required or assessment against one of the prior approval conditions is necessary. No changes were therefore proposed on this matter.

10.53.4 In terms of working with the University of Reading (UoR), the Council has continued to liaise to understand the UoR's intentions regarding its site. In particular it has considered emerging documentation regarding the site including a draft Estates Strategy, as well as a Strategic Plan and Net Zero-Carbon Plan. It had been expected that the final Estates Strategy would have been available during plan

preparation to inform the LPPU, but this has not been the case and in its absence the modifications have been drafted on the basis of the information that is available.

10.53.5 The main identified need for change was in relation to the clear statements in the Net Zero Carbon Plan relating to decarbonisation on the campus to help to achieve the UoR's goal of reaching net zero by 2030. The 2021 version of the Net Zero Carbon Plan informed the development of the LPPU, but there is now a replacement 2025-2030 version in place². Both versions identify the following pathway:

- A. All heating systems to be replaced with low/zero carbon alternatives;
- B. Better electrical energy - reducing waste, improving efficiency and ensuring electrical supplies are as low carbon as possible, and;
- C. Capping and capturing residual emissions, including through policy and technology alternatives and carbon insetting/offsetting.

10.53.6 There is a great deal more detail on how this is to be achieved within the plan itself, and not all of the proposals will be relevant to the need to apply for planning permission. However, some proposals may require permission and given that the UoR's aims for net zero in 2030 align with the Council's, it is considered wholly appropriate for the policy to be updated to anticipate this form of development.

10.53.7 The options considered for this policy were as follows:

- ER2(i) – Development for the purposes of meeting sustainability goals specifically referenced within the policy, and to include any else emerging from the University's plans to be taken into account
- ER2(ii) – Retain existing approach, no reference in the policy on development meeting sustainability goals or incorporation of other University plans

10.53.8 The Whiteknights Campus spans the boundary with Wokingham Borough, and it is therefore necessary to ensure that the policy operates effectively with the corresponding policy SS9 in Wokingham's Local Plan. The text of policy SS9 as submitted by WBC in February 2025 is set out in Appendix 6 of this statement, and much of the same wording is used in both plans. Whilst there are some differences, these are minor and would present no particular difficulties in applying the policies effectively. The Statement of Common Ground with WBC (Appendix 6 to the Duty to Co-operate Statement [EV001]) deals with the University of Reading as a strategic matter and states that the policies in the respective plans are consistent and notes that WBC supports the LPPU's general approach.

10.53.9 In terms of effectiveness, this policy will be implemented through development carried out by or on behalf of the UoR, and therefore the UoR's representations are of particular relevance. At Regulation 19 stage, the UoR confirmed its support for the policy as drafted but noted the need for additional text to ensure that the need for additional development on the campus is kept under review. This will ensure that the policy is effective over the plan period, given that this can change depending on

² [University-of-Reading-Net-Zero-Carbon-Plan-2025-2040.pdf](#)

approaches to higher education at a national level. A proposed modification to this effect is set out in Appendix 7.

- 10.53.10 Other representations relate to the need to reference additional criteria on the site such as its heritage. The Council considers that there are already policies in the plan which will achieve these aims (in this case EN1) and that re-stating these in ER2 will not add anything unless it raises additional considerations which would then in turn result in the policy being less flexible to be able to address the UoR's needs.

10.54 Is Policy ER3 justified and effective?

- 10.53.1 Policy ER3 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.

- 10.54.2 The background to the amendments to the policy is around the plans for the Royal Berkshire Hospital, and as these are not fully clear at this stage the policy needs to be worded flexibly.

- 10.54.3 The Royal Berkshire Hospital Foundation Trust (RBHFT) is the main hospital services provider for the people of Reading and these take place primarily at the Royal Berkshire Hospital on London Road but also on further sites in nearby towns. The London Road site has been a hospital site since 1839, and consists of the historic, listed North Block and a significant amount of more modern development. However, the premises are ageing, do not fully meet modern requirements and have limited scope for on-site expansion. Therefore, the hospital has been included within the government's New Hospitals Programme announced in 2020 to deliver 40 new hospitals by 2030. A new Royal Berkshire Hospital as part of this, under the Building Berkshire Together project³, is planned.

- 10.54.4 The Trust has expressed the intention to move off site but has also continued to investigate the possibility of redeveloping on site. A consultation was undertaken in July 2024 on two potential sites, at Thames Valley Park in Earley and Thames Valley Science Park in Shinfield. Both locations are within or on the edge of the Reading urban area but are in Wokingham Borough. The Council's preference is for the hospital to remain on site where it can be best accessed by Reading's population and the Council is concerned that a move to an alternative location will reduce access to key facilities for its residents. However, the decision will not lie with the Council. Both parties have been working closely throughout the process to understand the implications for Reading. This is detailed in terms of the Planning process in the Duty to Co-operate Statement [EV001] but the engagement has also been wider in terms of the full range of the Council's functions.

- 10.54.5 On 20 January 2025, the Secretary of State for Health and Social Care made an announcement⁴ regarding the new hospitals programme. This resulted in the Royal Berkshire Hospital being programmed for later delivery than had previously been

³ [Home - Building Berkshire Together New Hospital Programme](#)

⁴ [New Hospital Programme: plan for implementation - GOV.UK](#)

intended. The announcement placed the Royal Berkshire Hospital in wave 3, to commence construction between 2037 and 2039. This would place its delivery at the very end of the plan period or shortly afterwards. This has also meant that the Trust needs to consider options for location afresh, and other sites than those previously consulted upon may become available, but given the constraints of Reading and the large site needed it is very unlikely to include new sites in Reading Borough.

10.54.6 Policy ER3 has therefore been drafted against a considerable degree of uncertainty, as it needed to anticipate a situation where (a) the hospital redevelops on site, (b) remains on site until the end of the plan period and requires continued development to fulfil its role in the interim and (c) moves off site entirely and the site potentially becomes available for development. There is little that the Council can do to resolve this uncertainty at this stage.

10.54.7 Policy ER3 therefore deals with a situation where the hospital remains on site in point 1, and retains some of the key considerations from the existing policy relating in particular to the heritage significance of the listed original hospital and transport implications, as well as containing a clear statement of the Council's position on retaining the hospital on its current site. It also in point 2 deals with a situation where the hospital moves off site, and one of the key considerations here is to retain a healthcare presence on this site to reduce the impacts of any reduction in access for Reading's residents. The nature of this healthcare function cannot be defined at this point, because it has not been defined which services would be provided within the hospital itself and which would be located within the local community. The Council has worked with the RBHFT and ICB to try to understand this further, but it has not been sufficiently defined to give more detail at this stage. This would only take up part of the land, and for the remainder this is likely to be a site that is appropriate for residential use and community uses given that the surrounding uses are largely residential in nature, particularly around the south of the site.

10.54.8 The Council provided a draft of this policy to RBHFT prior to the Regulation 19 consultation and no changes were requested.

10.54.9 In terms of the implications of the different potential future for the hospital and its site, the intention was that this be tested through sensitivity tests in the transport evidence. There is a scenario regarding a relocated hospital in the Sustainable Connectivity and Vehicle Trip Distribution Study [EV017] which tests the implications of likely changes to public transport connections to and from the proposed new sites if the hospital were to move elsewhere, but these were not particularly significant for the identified sites. It was intended to include sensitivity testing regarding the hospital within the Transport Modelling Report [EV018], but before this was completed the announcement from the Secretary of State made clear that the new hospital was to be at the very end of the plan period at the earliest. Given the uncertainty about where the hospital would be located, this was not considered to have been a particularly useful exercise, and it could be considered again in a five-yearly review of the plan well before any development takes place.

10.54.10 The options considered for this policy were as follows:

- ER3(i) – To reference RBC's preference for RBH to remain in Reading, to enable sensitive expansion, that provisions are set out for the use of the site in the event that the hospital moves.
- ER3(ii) – No policy provisions for the potential changes and/or vacating of RBH
- ER3(iii) – To identify the site as a formal development allocation.

10.54.11 In terms of effectiveness, at this stage the key is to ensure that the policy is able to accommodate different futures for the hospital and site as described above. In this sense the policy is able to be effective over the plan period. In addition, this is a strategic matter and therefore has been subject to consideration under the duty to co-operate including with Wokingham Borough Council. This is reflected in the Statement of Common Ground with Wokingham Borough Council (Appendix 6 to the Duty to Co-operate Statement [EV001]) commits to continuing to work together to understand the implications of any decisions.

Taking each of the following proposed site allocations ER1b – ER1e, ER1i, ER1k - ER1n individually, respond to the following questions for each site as relevant:

10.55 What is the background to the site allocation? How was it identified and which options were considered?

10.55.1 Please see the schedules for each site in Appendix 5.

10.56 What is the basis for the scale, type, and use proposed? Is it justified?

10.56.1 Please see the schedules for each site in Appendix 5.

10.57 What is the site's status in terms of permissions or completions?

10.57.1 Please see the schedules for each site in Appendix 5.

10.58 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

10.58.1 Please see the schedules for each site in Appendix 5.

10.59 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

10.59.1 Please see the schedules for each site in Appendix 5. Please also see the comments in 10.17.2.

10.60 Are there any main modifications required to the allocation for soundness?

10.60.1 Please see the schedules for each site in Appendix 5.

Appendices

Appendix 1: Central Reading site information for questions 10.13 to 10.18

CR11a: Friar Street & Station Road

What is the background to the site allocation? How was it identified and which options were considered?

- A1.1 The site comprises the frontage of two of Reading town centre's most important thoroughfares, and is made up of a large number of relatively small separate ownerships which mainly consist of ground floor retail or other commercial with offices above, other than those sites where development has already taken place (see below). This includes the listed 13 and 15 Station Road and a number of other Victorian frontages.
- A1.2 In preparing the Reading Central Area Action Plan (RCAAP, adopted 2009) a City Centre Framework document was prepared which recommended wider areas of development and regeneration including this site, which were reflected in the RCAAP as Major Opportunity Areas. It was then brought across into the now-adopted Local Plan. The updated version of the City Centre Framework from 2008 has been added to the examination library as EX042.
- A1.3 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Continue with current mixed use allocation
 - Do not allocate
 - More limited identification of individual sites
 - Allocate for residential
 - Allocate for offices

What is the basis for the scale, type, and use proposed? Is it justified?

- A1.4 The area is highly appropriate for a mix of uses, being directly adjacent to Reading Station and an established office location with an increasing residential element. As such the approach has focused on delivering a mixed use development, which also ensures activity in this important area throughout the day. The area is also partly within the Station Cluster for tall buildings within policy CR10.
- A1.5 In the 2017 version of the HELAA on which the Local Plan was based, any permissions outstanding at the time (totalling 178 dwellings) were used. Any listed buildings were excluded from the remainder, leaving 0.24 ha remaining. On this land, it was assumed that the same amount of retail would remain across the site as key frontages are likely to remain in place. To calculate upper storeys, a footprint to site ratio of 66% was used from calculations that underpinned the Reading Central Area Action Plan (RCAAP) and it was assumed that development would be an average of seven storeys (six above retail base), which resulted in 13,686 sq m. A 50/50 split between residential and offices results in 6,843 sq m for each use. Assuming that there would be 1 dwelling per 94 sq m meant 61 additional dwellings. 50% of the conversion of the listed buildings for 6 dwellings resulted in a total across the site of 245 dwellings.

A1.6 The 2024 version of the HELAA [EV015 for the main report and EV016 for the tables] looked at the 11 remaining constituent elements of the site separately (site refs AB001-AB011). For 29-35 Station Road (AB001) the expired permission for the hotel (5,879 sq m) was used as the basis for the calculation, and for 35-39 Friar Street (AB010) the application that at the time had a resolution to grant permission (103 dwellings and 1,623 sq m commercial) and is now fully permitted was used. For most of the remaining sites (AB002-06 and AB009) a conversion of the upper floors to 50% office and 50% residential was assumed, and the residential converted to dwellings using one dwelling per 64 sq m as set out in the HELAA, with retention of ground floor commercial. The three remaining sites were treated as follows based on their character and surroundings:

- 1 Merchants Place (AB007) and 30-31 Friar Street (AB008) – A footprint to site ratio of 64% was assumed (see HELAA and an eight storey development, split into 50% office and 50% residential, with 90.4 sq m per dwelling to convert floorspace to dwellings (see HELAA). However, at suitability stage it was identified that a development on that scale on 1 Merchants Place would potentially cause issues for development on neighbouring sites so a conversion was instead assumed.
- 8 Merchants Place (AB010) – As above but a height of six storeys assumed. At suitability stage this was reduced to three storeys to avoid impacts on the already developed Station Hill Plot F.

This meant a total capacity across the site of 161 dwellings, 5,879 sq m hotel, a small net gain of 628 sq m retail and a net loss of offices. Application of a 20% margin for flexibility above and below this figure and rounding to the nearest ten for figures over 100 would result in a range of 130-190 dwellings and 5,000-7,000 sq m hotel. However, it has been noted that the bottom end of the range has mistakenly been set at 120 rather than 130 and a main modification is proposed to address this.

A1.7 Therefore, the assessed capacity for the site has reduced, but this is largely the result of some developments already having completed by 2024.

What is the site's status in terms of permissions or completions?

A1.8 Parts of the area have already been completed as follows:

- Refurbishment and four additional storeys on Thames Tower completed in 2018 under permission 14/1043
- Prior approval 14/1277 for conversion of Garrard House, 30 Garrard Street to 83 dwellings and permission 16/0328 for roof extension for 18 dwellings completed in 2018
- Prior approvals 20/0863 and applications 19/1588 and 20/1175 for conversion and extension of upper floors of 1 Station Road/22 Friar Street to 14 dwellings approved in 2020 and 2021, and completed 2022-23
- Prior approval 14/1529 for conversion of upper floors of 7-11 Station Road to 18 dwellings and permission 14/0189 for roof extension for an additional 3 dwellings completed in 2015-16.

These are all shown as completed developments on figure 5.3 of the LPPU.

- A1.9 13-15 Station Road has permission (23/0202) for conversion of upper floors from offices to 7 dwellings which is not yet implemented. A subsequent application for a conversion minus an affordable housing contribution was recently refused in November 2025 and may be appealed.
- A1.10 35-39 Friar Street has permission granted in November 2025 for redevelopment for 103 dwellings and ground floor commercial uses, which is also not yet implemented.
- A1.11 29-35 Station Road has no current permissions, but it has been subject to a number of expired permissions in the past. Most recently permission 18/1930 was granted for a hotel, office and retail development of 22 storeys. There has also been an expired prior approval (14/1275) for conversion of offices to 27 dwellings and an older expired permission (04/0516) extended in 2010 for redevelopment to 103 dwellings in a 22 storey building.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A1.12 There are no particular infrastructure requirements, with sites expected to come forward in smaller parcels. This can lead to some unusual costs, for instance one of the particular issues in bringing forward the 29-35 Station Road site is understood to be that, with the very small footprint of the site surrounded by highway, this makes siting construction vehicles and materials difficult.
- A1.13 The identified constraints include potential archaeology, listed buildings and locally listed buildings and their settings, potential contamination, air quality, noise (in particular from evening economy uses on Friar Street) and the relationship with surrounding developments in particular Station Hill plots E and F that potentially restrict the ability to deliver high density on those sites. These issues have all been taken into account in assessing the development capacity of the site, or would be capable of being addressed at planning application stage. Many of the sites are assumed for conversion only in any case, which would limit the impact of matters such as archaeology and contamination.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A1.14 This area is likely to come forward in small parcels given the fragmented ownership, and it is therefore assumed for delivery across the whole plan period. Those sites with planning permission are likely to be delivered in the short to medium term, with the remainder likely to be in the long term. This is how development has progressed in this area so far, with sites that had previously been occupied being brought forward with little prior warning. Most of the remaining sites once permissions have been accounted for are small in the context of the wider allocation, with the exception of 29-35 Station Road, which is vacant and available for development now.

Are there any main modifications required to the allocation for soundness?

- A1.15 Yes. A main modification is proposed to change the bottom end of the range from 120 to 130 dwellings as described above.

CR11b: Greyfriars Road Corner

What is the background to the site allocation? How was it identified and which options were considered?

A1.16 The site consists of three elements – an office building (20-30 Greyfriars Road), a 2017 development of student accommodation with ground floor retail (6-10 Greyfriars Road/62 Friar Street) and a Sainsburys supermarket (52-55 Friar Street). In preparing the Reading Central Area Action Plan (RCAAP, adopted 2009) a City Centre Framework document was prepared which recommended wider areas of development and regeneration including this site, which were reflected in the RCAAP as Major Opportunity Areas. It was then brought across into the now-adopted Local Plan. The updated version of the City Centre Framework from 2008 has been added to the examination library as EX042.

A1.17 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Mixed use with leisure and retail on ground floor, 90-140 dwellings
- Office development
- Residential and office development (up to 60 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

A1.18 As a part of the Station/River major opportunity area and the commercial core of the centre, the site is appropriate for a mix of uses with commercial on the ground floor and residential above. In the 2017 HELAA, this site (other than the student accommodation as a recent development) was assessed by using a footprint to site ratio of 43% and applying the benchmark height of 6 storeys from the Reading Station Area Framework for this plot and assuming that 50% of the ground floor, that on Friar Street, will involve town centre uses. The remaining floorspace was expected to be residential, converted from floorspace to dwellings using a figure of one dwelling per 94 sq m. This resulted in a figure of 96 dwellings. Adding in the student accommodation, under construction at the time, which equated to around 17 dwellings, resulted in a figure of 113. Flexibility of 20% on either side was applied and figures over 100 rounded to the nearest ten and this resulted in a range of 90-140.

A1.19 By the 2024 HELAA there had been a number of changes. The student accommodation at 6-10 Greyfriars Road/62 Friar Street had been removed and did not need to be reflected in the allocation. Planning permission on 52-55 Friar Street (ref AB012) had been granted for 135 dwellings and a reduction of ground floor retail in March 2018 and then expired in March 2021, and this was used as the basis for the HELAA for this site. On 20-30 Greyfriars Road (AB013) prior approval had also been granted for conversion to 43 dwellings, but as this was a prior approval and was not necessarily the preferred outcome for the site, a redevelopment option was assessed at town centre density of 327 dph resulting in a capacity of 60 dwellings. This meant a total of 195 dwellings, and using a 20% flexibility margin on either side and rounding to the nearest ten resulted in a range of 160-230 and no net gain in ground floor commercial.

What is the site's status in terms of permissions or completions?

- A1.20 The only current planning permission on the site is for 20-30 Greyfriars Road. Planning permission (24/1501) was granted in August 2025 for a development of part 7 and part 13 storeys for what would be Reading's first purpose-built shared living (or 'co-living') development, which would equate to around 67 dwellings.
- A1.21 Other permissions on the site have expired, including the conversion of 20-30 Greyfriars Road to 43 dwellings under prior approval 20/0211 and the redevelopment of 52-55 Friar Street to 135 dwellings and ground floor commercial use (16/2210).

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A1.22 There are no particular infrastructure requirements and unusual costs that would not usually apply to a town centre brownfield site.
- A1.23 The identified constraints include archaeological potential, air quality, noise from late-night premises on Friar Street and the relationship with new residential properties delivered as part of the first phase of Station Hill. In terms of the Station Hill relationship, the first residential phases were determined in 2021 when the 52-55 Greyfriars Road proposal had permission, and would have been taken into account then. All issues have therefore been considered as part of granting permission for the various elements.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A1.24 The development at 20-30 Greyfriars Road has recently been granted permission and, although the existing office building is still occupied, we consider that this is likely to be available, viable and deliverable in the short term.
- A1.25 The Council understands that in the case of 52-55 Friars Street the intention is for the Sainsburys store to remain in situ for the foreseeable future. Whilst this could change in the plan period, in terms of the housing trajectory, HELAA and figure in policy H1, no delivery from this part of the site is assumed.

Are there any main modifications required to the allocation for soundness?

- A1.26 Yes. A proposed main modification was agreed in the Statement of Common Ground with Historic England [EX014] to ensure soundness (see Appendix 7).
- A1.27 It is not considered that any change is needed to the dwelling range to account for the new permission at 20-30 Greyfriars Road as this would only increase the capacity by an equivalent of 7 dwellings, and any amended figure in a new version of the HELAA would still fall within the updated range in the LPPU.

CR11c: Station Hill and Friars Walk

What is the background to the site allocation? How was it identified and which options were considered?

- A1.28 This site is arguably the most prominent development site in Reading. It is a large town centre site formerly containing offices, bus station, bingo hall, shopping centre, car parking and other uses. All but the car park and one office building are now demolished. The site was first identified in part for development in the 1998 Local Plan and has been present in all relevant development plan documents since. There is also a Station Hill South Planning and Urban Design Brief for the site dating from 2007.
- A1.29 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Continue current allocation
 - Allocate for offices
 - Allocate for residential

What is the basis for the scale, type, and use proposed? Is it justified?

- A1.30 The site is appropriate for a wide mix of uses given its prominent location, including residential, offices and retail, which will ensure that this key town centre site adjacent to the station is enlivened as a destination throughout the day. The area is also within the Station Cluster for tall buildings within policy CR10. The site is fully covered by planning permissions, some of which have already been built out, and those permissions that were not complete by April 2024 form the basis of the scale identified. Because part of the site is permitted in outline with very wide parameters, the illustrative scheme submitted as part of the outline is used to assess capacity for that part of the site. In total, the level of development permitted that entails is 615 dwellings, around 80,000 sq m offices and 4,700 sq m of retail uses, to which 20% flexibility in either direction is applied. However, applying this to the dwelling figure results in a range (490-740) the upper limit of which is below the total permitted figure if all dwellings permitted in outline were to be developed (934) so the upper limit of the range is adjusted to reflect that.

What is the site's status in terms of permissions or completions?

- A1.31 The site has a very long and complex planning history and there have been several iterations of redevelopment proposals that have had planning permission. At the current time, the site can be broadly divided into four:
- Phase 1 Plot E – this site along Friar Street was the first to be developed under planning permission 20/1537 and comprises 415 dwellings and ground floor commercial that was completed in 2024. These figures are excluded from the allocation total.
 - Phase 1 Plot F – this site to the east of plot E has been developed under planning permission 20/1533 for 184 dwellings and ground floor commercial and

was completed in 2025 alongside the public realm and pedestrian link through the site.

- Phase 2 – this has been developed for a new office building of around 35,000 sq m and ground floor commercial uses and was completed in 2025 opposite the station. It was permitted as part of hybrid application 19/2032 which also contains the outline permission for the remainder of the site.
- Phase 3 – the remainder of the site is permitted in outline under 19/2032. The parameters in terms of uses are extremely broad, but they include residential (0-750 dwellings), offices, commercial, hotel, residential care and other uses in a number of buildings which would be among the tallest in Reading. A reserved matters application is expected shortly. This had not previously been progressed to allow for it to be informed by the market performance of the residential and office developments completed so far to inform the desired mix.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.32 The main infrastructure provision has already been made as part of the development so far, including the new public space and pedestrian link through the site. Any remaining matters are dealt with in the planning permission.

A1.33 Constraints identified include archaeology, contamination and air quality, as well as the landscape and townscape impacts of tall buildings. These have all been dealt with as part of the planning permission.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.34 For the only outstanding part of the site, Phase 3, the site is almost entirely demolished other than one vacant office building. It is available for development and the developer is intending to bring it forward for development soon. Since this remainder of the site only has outline permission, and bearing in mind NPPF guidance on avoiding outline permissions being part of five-year supply, it is assumed in the housing trajectory that completion of the remaining development will take place in the medium term, from 2029.

Are there any main modifications required to the allocation for soundness?

A1.35 No.

CR11d: Brunel Arcade and Apex Plaza

What is the background to the site allocation? How was it identified and which options were considered?

- A1.36 The site consists of Brunel Arcade, the old Reading Station concourse (including ticket office), as well as Apex Plaza, a neighbouring office building of around seven storeys. The Brunel Arcade was first nominated to the Council in the call for sites exercise in January 2014 as a development opportunity by Network Rail as a result of the opening of the new Reading station in 2014 removing the need for the old concourse, and it was included as a potential allocation in the Local Plan Issues and Options (January 2016) with a potential extension to include Apex Plaza identified by officers. This was subsequently supported by Apex Plaza's owners through the consultation processes on the Local Plan, resulting in the inclusion of the whole site as an extension to the major opportunity area in the now adopted Local Plan. Apex Plaza's owners made a submission as part of the call for sites in spring 2023 to ensure that the site be retained in the LPPU.
- A1.37 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Mixed use scheme including residential
 - Retail and related uses
 - Office use
 - Residential

What is the basis for the scale, type, and use proposed? Is it justified?

- A1.38 The site is directly adjacent to the station and is appropriate for a mix of uses including residential at a high density including potential for a tall building on the Brunel Arcade site. The area is also within the Station Cluster for tall buildings within policy CR10.
- A1.39 In the 2017 version of the HELAA, on the Brunel Arcade site, a 66% footprint to site ratio was applied, and the heights from the Reading Station Area Framework (adopted 2010) were used, which identified a landmark height of 15 storeys and benchmark heights of 6 storeys. The assumption was that one third of the site would be at landmark height and the remainder at benchmark. 50% of the ground floor was assumed to be retail and the resulting floorspace was split evenly between office and residential, with residential floorspace converted to dwellings by using a figure of 94 sq m per dwelling. This resulted in a capacity of 172 dwellings and net gains of around 16,000 sq m office and 1,900 sq m retail. At the same time on Apex Plaza, the same approach was used but without the need for any ground floor retail and assuming six storeys across the site (in line with the benchmark for the adjacent Brunel Arcade). This resulted in a capacity of 229 dwellings and a net loss of around 11,000 sq m offices. The total across the whole sub-area was therefore 401 dwellings, around 5,000 sq m office net gain and 1,900 sq m retail net gain. However without a much more thorough search through our records we cannot account for the

range in the policy appearing to be set on a lower basis than this, other than that the capacity after non-implementation rates of 20% expressed as a range with 20% flexibility on either side results in a range very close to what is in the policy, so it may well have been an error.

- A1.40 In the 2024 HELAA, the approach to Brunel Arcade (AB058) is the same with the changes being the new version's revised ratios for footprint to site conversion (64%) and for converting floorspace to residential (one dwelling per 90.4 sq m) based on more recent information, but the benchmark height is increased to 8 storeys to reflect the fact that, although the site has heritage assets in close proximity, the neighbouring Apex Plaza is already 7 commercial storeys, so an 8 storey development here is not considered unreasonable. This results in an adjusted capacity of 202 dwellings, around 18,000 sq m offices and 1,900 sq m retail. However at suitability stage an adjustment was this time made to account for the railway to leave a 20m buffer for noise and light effects and reflecting the identified treed corridor. The adjusted capacity was 174 dwellings, and around 16,000 sq m offices and 1,600 sq m retail. On Apex Plaza (AB057), the same approach was used as in 2017 with the new ratios as described above in relation to Brunel Arcade, but as for Brunel Arcade the height was again increased to 8 storeys to reflect only a slight increase over the existing 7 storey building opposite a conservation area. This resulted in an initial capacity of 263 dwellings and a net loss of 5,500 sq m offices. A similar adjustment at suitability stage to leave a 20m buffer to the railway but also retain protected trees was applied, resulting in an adjusted capacity of 174 dwellings and a net loss of around 15,000 sq m offices.
- A1.41 The total HELAA 2024 capacity across the whole site was therefore 348 dwellings and a small net gain of 1,000 offices and 1,600 sq m retail. Applying 20% flexibility in either direction and rounding to the nearest ten results in a range of 280-420 dwellings and around 1,000 – 2,000 dwellings. In the context of the existing significant office floorspace it was not considered particularly useful to specify the scale of such a marginal net gain of offices.
- A1.42 The site was identified as the best opportunity in this planned wider Station/River area to deliver healthcare uses close to the station, which are currently insufficient in central Reading. The Integrated Care Board (ICB) in their response at Regulation 18 stage identified the need for a facility to be delivered under CR11. At the time the LPPU was drafted, this site represented the best opportunity to meet those needs because the other major sites close to the station that could absorb this requirement (Station Hill, 80 Caversham Road, Vastern Court, 55 Vastern Road) already have permission or are not expected to come forward in the plan period (Network Rail Car Park). It should be noted that the ICB have at Regulation 19 stage and in contrast to their earlier representation objected to this being part of the allocation, preferring instead to seek financial contributions towards a site elsewhere, but without any further detail on where that site would be the Council is concerned that it will not be delivered, particularly since the potential available development sites in Central Reading are already reflected in the plan. We are therefore concerned that the ICB approach will not be effective in securing the necessary infrastructure, and it is not clear why this site directly adjacent to the station and a multitude of town centre bus

stops and a public car park nearby has been judged an inappropriate location for primary healthcare.

What is the site's status in terms of permissions or completions?

A1.43 There are no relevant planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.44 The Brunel Arcade part of the site provides existing infrastructure including a ticket office but the new station building opened in 2014 is intended to be able to meet all relevant station needs and it is therefore understood that these facilities could be reprovided in the new building without requiring new floorspace. The basement also includes drop-off parking, which could potentially be retained as part of any development but the retained Network Rail car park and surrounding land north of the station could also offer an opportunity for re-provision. The existing basement does add a complexity to the site.

A1.45 As set out above, the main infrastructure requirement in the policy is the provision of a fitted out primary healthcare unit. This would clearly be a cost to the developer. However, it would also be a major benefit to future residents of the scheme. Our experience is that community units are often provided at the ground floor of major town centre residential proposals but can struggle to find an occupant. This would resolve this issue as long as, through the ICB, a practice could be secured.

A1.46 The identified constraints include protected trees on the Apex Plaza site, the status of the railway line as a treed corridor, the setting of the conservation area and listed buildings, contamination, air quality, noise and light issues relating to the railway in particular and small areas of flood risk particularly from surface water flooding. These have mainly been taken into account when setting the relevant capacity for the site, but other items such as contamination and air quality would need to be addressed at planning application stage. The site has passed the sequential test for flood risk and the areas of higher risk are very limited.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.47 Both sites are currently in use, but Network Rail's intention is known to be to bring the Brunel Arcade site forward for development and a planning application is currently anticipated during 2026. At call for sites stage the Apex Plaza owners identified the potential for the site to come forward in years 11-15. The sites do not need to be delivered at the same time. Other than the need to move some functions within Brunel Arcade to elsewhere in the station complex, there are no known significant impediments to development. Delivery of these sites is therefore considered to be realistic. However, due to the complexity of any likely development and of the large amount of demolition required, these have been identified as being delivered in the long term.

Are there any main modifications required to the allocation for soundness?

A1.48 No.

CR11e: North of the Station

What is the background to the site allocation? How was it identified and which options were considered?

- A1.49 The site is a major development opportunity immediately adjacent to the northern entrance to Reading Station and the new Station Square North. As such, it is one of the most accessible sites in the South East. It consists of three elements:
- The former Royal Mail sorting office at 80 Caversham Road, now vacant
 - Vastern Court Retail Park
 - The Network Rail-owned station multi-storey car park.
- A1.50 In preparing the Reading Central Area Action Plan (RCAAP, adopted 2009) a City Centre Framework document was prepared which recommended wider areas of development and regeneration including this site, which were reflected in the RCAAP as Major Opportunity Areas. It was then brought across into the now-adopted Local Plan. The updated version of the City Centre Framework from 2008 has been added to the examination library as EX042.
- A1.51 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Continue current mixed use allocation
 - Less emphasis on retail and leisure
 - Office development
 - Residential development
 - Locate uses in accordance with flood risk

What is the basis for the scale, type, and use proposed? Is it justified?

- A1.52 Given the accessibility very close to the station, the site was always intended to have a wide range of uses to ensure it was activated at all times of the day and formed a destination in itself. The area is also within the Station Cluster for tall buildings within policy CR10. In the 2017 version of the HELAA, the capacity of the site was assessed using a specific approach for this site. For 80 Caversham Road, the expired planning permission as used. For the remainder, the basis was the adopted Reading Station Area Framework (RSAF) which broke the site up into plots. These plots were used and the Station Area Framework benchmark heights were used together with a footprint to site ratio of 43% to work out overall floorspace. It was assumed that one third of the ground floor would be retail (in line with the need for active frontages in RSAF) and that the remaining floorspace would be 50% offices, 50% residential. The total residential floorspace was then converted to dwellings using a figure of 94 sq m of total floorspace per dwelling. This resulted in a total capacity of 815 dwellings, 80,000 sq m offices, 5,500 sq m retail and leisure and 10,000 sq m hotel.
- A1.53 By the time of the 2024 HELAA, planning permissions had been granted on both 80 Caversham Road and Vastern Court Retail Park. These were both outline

permissions, but the 80 Caversham Road permission was much more specific about development capacity. For 80 Caversham Road (ref TH001), therefore, the planning permission totals were used, which included 620 dwellings, around 20,000 sq m offices and around 2,500 sq m retail and leisure. For Vastern Court Retail Park (ref TH002), there is an extremely wide range of development totals, and the maxima could not be used because maximising residential would reduce offices and vice versa. Therefore, the illustrative scheme from the application was used, which contained 637 dwellings, around 24,000 sq m offices and around 4,000 sq m of retail and leisure.

A1.54 For the Station car park (ref TH003) the HELAA used a ratio of footprint to site ratio of 43%. It then assumed that two thirds of the site would be developed at the benchmark height for the site in the RSAF (8 storeys) and that one third would be developed at the landmark height (15 storeys). The resulting floorspace was split into 50% offices and 50% residential, and total residential floorspace was then converted to dwellings using a figure of 90.4 sq m of total floorspace per dwelling. The site size was slightly reduced to allow a 10m buffer to Vastern Road as a treed corridor and 20m buffer to the railway. The resulting capacity was 236 dwellings and around 21,000 sq m offices.

A1.55 The total resulting capacity for the whole site was 1,493 dwellings and around 65,000 sq m offices, as well as retail and leisure. The latter was a net loss due to the existing on site retail floorspace. Using 20% flexibility margins in either direction and rounding to the nearest ten, a range of 1,190-1,790 dwellings and 50-80,000 sq m of offices was identified.

What is the site's status in terms of permissions or completions?

A1.56 Both 80 Caversham Road and Vastern Court Retail Park have planning permission.

A1.57 Outline permission for 620 dwellings, offices, retail and leisure and hotel (18/2252) at 80 Caversham Road was granted in March 2023. Reserved matters have not yet been submitted.

A1.58 An outline application (20/0328) at Vastern Court Retail Park for redevelopment for a flexible mix of residential (up to 1,000 dwellings) offices, retail, public house, take away, community and leisure, car parking was appealed for non-determination and was recovered for decision by the Secretary of State, who granted permission in March 2024. Reserved matters have not yet been submitted.

A1.59 There are no permissions or applications in relation to the Station car park site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.60 There are some requirements in terms of provision of routes and spaces through the site that would be vital to provide. A vehicular route would need to run between the Vastern Court Retail Park and 80 Caversham Road sites, which, whilst not a particularly significant cost, introduces a complexity in terms of which party provides that route and when. This latter issue was dealt with in the respective Section 106 agreements for the current permissions.

A1.61 The identified constraints include protected trees, contamination, air quality, noise and disturbance from the road and railway, flood risk, the wider impacts of tall buildings on site and potential impact on water and wastewater infrastructure. These issues were able to be overcome in the two sites that have been granted permission. In terms of flood risk, the relevant SFRA Level 2 [EV038f] identifies that, as only a small proportion of the site falls within Flood Zone 3, it should be possible to locate the majority of residential development outside of its extent but that some infrastructure may need to be raised above the design flood level.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.62 The 80 Caversham Road site is vacant and is available for development. As this is an outline permission only, this has been identified as being delivered in the medium term. The Station Retail Park site is also permitted in outline, and the landowners when contacted through the HELAA process confirmed that it was likely to become available between 2024 and 2029, but given the scale of the development this is more likely to be delivered into the long term.

A1.63 The Station car park site is not expected to become available in the plan period, and Network Rail when contacted through the HELAA process confirmed that the site will remain in use for parking for the station. As such, the final HELAA figure and the housing provision figure in policy H1 assume that development will not come forward in the plan period. However, given the prominence of the site directly adjacent to the station and the need for it to relate to the station square, public realm and nearby sites, it is considered vital to retain it within the allocation.

Are there any main modifications required to the allocation for soundness?

A1.64 No.

CR11f: West of Caversham Road

What is the background to the site allocation? How was it identified and which options were considered?

- A1.65 The site consists of two elements, a former retail and manufacturing site at 97-117 Caversham Road and a self-storage facility at 75-77 Caversham Road. In preparing the Reading Central Area Action Plan (RCAAP, adopted 2009) a City Centre Framework document was prepared which recommended wider areas of development and regeneration including this site, which were reflected in the RCAAP as Major Opportunity Areas. The updated version of the City Centre Framework from 2008 has been added to the examination library as EX042. Although this site was not part of the Station/River MOA in the RCAAP due to flood risk, it was subsequently identified as part of the MOA in the now-adopted Local Plan when the flood risk extents had changed.
- A1.66 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Mixed-use development
 - Retail/leisure development
 - Office development
 - Industrial/warehouse development
 - Medium density residential
 - Higher density residential

What is the basis for the scale, type, and use proposed? Is it justified?

- A1.67 The site has been considered for residential, since commercial uses along Caversham Road have been gradually being changed to residential over recent years. At Local Plan stage, the 2017 HELAA initially used a town centre fringe density of 200 dph for both sites, but after suitability analysis reduced densities to 100 dph with a 200 dph frontage to 75-77 Caversham Road, meaning a total of 96 dwellings. Applying 20% flexibility margins in either direction meant a figure of 75-115.
- A1.68 By the time of the 2024 HELAA, 97-117 Caversham Road had planning permission for 60 dwellings (site ref TH005). The HELAA therefore used the permission as the basis for the site. For 75-77 Caversham Road (site ref TH004) the HELAA used an urban density of 112 dph resulting in a basic capacity of 64 dwellings. This was felt to be appropriate given the site's close relationship with two storey terraced housing to the west. However, after suitability analysis the site size was reduced to allow 10m buffer to Caversham Road as an identified treed corridor and allow for appropriate back to back distances from Swansea Road and Northfield Road. This gave a revised figure of 58 dwellings. The total across both sites was therefore 118. Applying a 20% flexibility margin in either direction (and rounding to the nearest ten for figures above 100) gives a range of 94-140.

What is the site's status in terms of permissions or completions?

A1.69 The site at 97-117 Caversham Road, one of the two sites that comprise this allocation, has planning permission (22/1324). This is currently under construction and not far from completion. There are no permissions or applications covering the other site, 75-77 Caversham Road.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.70 There are no particular infrastructure requirements and unusual costs.

A1.71 The identified constraints include the identified treed corridor along Caversham Road, contamination, air quality, road noise, flood risk and overlooking and privacy issues with some properties to the rear. For 97-117 Caversham Road this has been taken into account in granting permission. For 75-77 Caversham Road, the capacity from the HELAA has been adjusted to account for those issues that affect development potential, and others would need to be taken into account at planning application stage. In terms of flood risk, the site is already completely covered by buildings and hardstanding, and the relevant SFRA Level 2 [EV038w] identifies that a residential development should be possible but some infrastructure may need to be raised.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.72 The 97-117 Caversham Road site is under construction and should complete within the next 1-2 years. For the 75-77 Caversham Road site the site is not currently available, but given the significant planned development in the area and the history of commercial sites coming forward for a residential use, development is considered to be realistic within the plan period. The housing trajectory and Figure 10.1 identify delivery in the long term, after 2033.

Are there any main modifications required to the allocation for soundness?

A1.73 No.

CR11g: Riverside

What is the background to the site allocation? How was it identified and which options were considered?

A1.74 The site consists of former offices and a depot for SSE alongside existing electrical infrastructure. This site was originally included as an allocation in the Reading Borough Local Plan 1998 for residential. In preparing the Reading Central Area Action Plan (RCAAP, adopted 2009) a City Centre Framework document was prepared which recommended wider areas of development and regeneration including this site, which were reflected in the RCAAP as Major Opportunity Areas. It was then brought across into the now-adopted Local Plan. The updated version of the City Centre Framework from 2008 has been added to the examination library as EX042.

A1.75 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Continue current mixed use allocation
- Do not allocate
- Mainly commercial development
- Mainly leisure development
- Residential development

What is the basis for the scale, type, and use proposed? Is it justified?

A1.76 This has been a longstanding allocation for primarily residential use. The 2017 version of the HELAA used the adopted Station Area Framework as the basis for calculating the development potential, and used the plots and benchmark heights defined in that document on the site (together with a footprint ratio of 43%) to calculate a total floorspace for the development. It assumed that 25% of the ground floor would be in leisure use and the remainder in residential, and converted dwellings to floorspace using a 94 sq m per dwelling figure. This resulted in a capacity of 255 dwellings and 1,286 sq m of leisure.

A1.77 By the 2024 version of the HELAA, the site had been split and part sold by SSE and permission had been granted on the 55 Vastern Road part of the site (see below) (ref TH006). This meant that, for the part of the site covered by the permission, the dwelling figure of 209 was used as well as a very small cafe. For the remainder (ref TH007) an urban density of 112 dph was applied, giving a basic capacity of 134 dwellings. A buffer to rear of all properties to be constructed on adjacent site was removed as well as a 10m buffer to the River Thames for biodiversity setting and to Vastern Road to account for the treed corridor, which reduced the capacity to 105 dwellings. This gives a total of 314 dwellings for the whole site. Applying a 20% flexibility to this figure in either direction (and rounding to the nearest ten) gives a range of 250-380.

A1.78 The main other change to the allocation is to add reference to a route through the site being direct. This was a matter considered in depth during the appeal for 55 Vastern Road, and the Council maintains that it is vital that links between the station and

Thames are as direct as possible on this vitally important north-south corridor. However, the link that will be delivered is that in the permitted scheme.

What is the site's status in terms of permissions or completions?

- A1.79 There are two parts to the site which was formerly in one ownership. Around half of the site (known as 55 Vastern Road) was separated out and sold, and has been brought forward as a planning application for 209 dwellings, a pedestrian and cycle link through the site and a small café. This application (20/0188) was granted on appeal in March 2022. Demolition had been completed by the end of 2024-25, and the blocks fronting Vastern Road are now under construction. Completion in 2028 is anticipated.
- A1.80 There is no permission covering the remainder of the site. This consists of electricity infrastructure and associated land and is being retained by SSE.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A1.81 For the 55 Vastern Road portion of the site, delivery of the pedestrian and cycle link connecting to the Christchurch Bridge is the most significant infrastructure issue, but the development is under construction so it is assumed this will not hinder delivery. For the remainder of the site, development would require relocation of the electricity infrastructure, which is likely to be very costly and an alternative site would need to be identified.
- A1.82 Constraints relating to the 55 Vastern Road site have been overcome as the development is now underway. For the remainder of the site, identified constraints include the treed corridors along Vastern Road and the Thames, the biodiversity significance of the Thames, air quality, contamination, noise and disturbance from Vastern Road, flood risk due to being partly located in Flood Zone 2, overlooking and privacy issues with the rear of the 55 Vastern Road development. Some of these have led to the reduction in the site capacity through the HELAA. Others would be expected to be dealt with at planning application stage, and none would be likely to prevent development.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A1.83 The 55 Vastern Road site is now under construction and it is therefore considered to be available, viable and deliverable. The delivery rates shown in the Housing Trajectory are based on the totals in the different blocks, with delivery over the period 2026-2029.
- A1.84 The remainder of the site is in electrical infrastructure use and is not currently available. There is no current expectation that it will be brought forward in the plan period. Moving the equipment will be a significant cost, and the division of the site means that the opportunity to fund this through maximising enabling development has to some degree been lost. For this reason, the HELAA assumes this part of the site will not be delivered over the plan period, and it does not therefore count towards the total in the housing trajectory and policy H1. Nevertheless, it is considered

important to retain the allocation as the site is a prominent one close to the Thames and station and if the site were to be brought forward it will be important to have a robust policy basis upon which to assess any proposals.

Are there any main modifications required to the allocation for soundness?

A1.85 No.

CR11i: Napier Court

What is the background to the site allocation? How was it identified and which options were considered?

A1.86 The main part of the site contains three two-storey office buildings between the railway and Napier Road, which is a significant underuse of land so close to the station. This was originally identified as a site allocation within the Sites and Detailed Policies Document which was adopted in 2012. When the comprehensive Local Plan was prepared the site was brought into the Major Opportunity Area alongside adjacent sites from the Reading Central Area Action Plan.

A1.87 When the now-adopted Local Plan was subject to consultation at draft (Regulation 18) stage, in June 2017, Network Rail identified their landholding adjacent to the eastern end of the main site containing a depot and operational land as having potential for development as an extension to the Major Opportunity Area. The response stated that:

“It is anticipated that following the upgrade work to the rail network on the west side of Reading, an area of operational land within the “Railway Triangle” off Cow Lane will become available. This is likely to provide an opportunity to re-locate the depot and storage facilities currently at Napier Road to the Railway Triangle. Our holding at Napier Road would then become vacant and suitable for a residential development.”

A1.88 Following this response, the allocation was extended to include the Network Rail land in the Pre-Submission (Regulation 19) and adopted version of the Local Plan.

A1.89 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential development excluding the Network Rail depot (180-260 dwellings)
- Residential development including the Network Rail depot (210-310 dwellings)
- Mixed use office and residential
- Office development
- Leisure development

What is the basis for the scale, type, and use proposed? Is it justified?

A1.90 The site is considered to have particular potential for residential use given its location adjacent to open space and being somewhat further from the station than is the main focus for office development currently.

A1.91 For the 2017 HELAA, the site was assessed in two parts. For the main part of the site containing offices, a town centre fringe density of 200 dph was used to arrive at a basic capacity of 220 dwellings, but this was revised downwards to 192 dwellings to remove land that would be required for the mass rapid transit proposal at the time. For the Network Rail part of the site, which is further away from the town centre and station, an urban density of 81 dph was used to arrive at a dwelling capacity of 69

(excluding all land east of the depot which is subject to various constraints including biodiversity significance. This gives a total capacity for the site of 261 dwellings, to which 20% flexibility in either direction was applied, and rounded to the nearest ten, to give a range of 210-310.

- A1.92 In the 2024 version of the HELAA, the two parts of the site were again assessed separately. The part containing the offices (ref TH008) was assessed using a town centre density of 327 dph, resulting in a basic capacity of 360 dwellings. However, significant adjustments were made at suitability stage to reduce the site to account for a 20m buffer to the railway for noise issues and remove areas subject to TPO, and to assume one third of the site is developed at urban density (112 dph) to reflect sensitivities of landscape feature, listed building and the need to transition away from town centre density. This resulted in an adjusted capacity of 253 dwellings. For the Network Rail part of the site {ref TH009) an urban density of 112 dph was used to give a capacity of 72 dwellings. This was adjusted to include a 20m buffer to the railway and remove areas covered by priority habitat, resulting in an adjusted capacity of 59 dwellings. The total site capacity is therefore 312 dwellings. Applying 20% flexibility in both directions and rounding to the nearest ten gives a range of 250-370.

What is the site's status in terms of permissions or completions?

- A1.93 The main part of the site containing offices is currently subject to a planning application (24/0846) received in July 2024 for 570 build to rent dwellings in a development of 11 storeys. This is currently undetermined.
- A1.94 There are no applications or permissions relating to the Network Rail part of the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A1.95 The main infrastructure requirement in the policy is for the provision of new or reinstated bus stops on Napier Road, a mitigation measure identified in the Sustainable Connectivity and Trip Generation Analysis [EV017] and which would represent a modest cost. The policy also identifies the need to safeguard land needed for bus rapid transit, but this is now considered likely to use existing highways land.
- A1.96 The constraints identified in the HELAA suitability analysis included the presence of some TPO trees, the treed corridor along the railway, a green link crossing the site, the setting of the listed Thames Lido, contamination, air quality, lighting and noise impacts from the railway, flood risk and an on-site electricity sub-station. Most of these issues are taken into account in arriving at the site capacity, or would be dealt with at planning application stage. Flood risk is assessed in the relevant Stage 2 SFRA [EV038d].

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A1.97 On the main part of the site containing offices, the current planning application indicates that development on the land is potentially deliverable. Prior approval

(24/1113) for demolition of the existing office buildings was given in June 2025. The landowner was contacted through the HELAA process in 2024 and confirmed that the site is already available for development.

A1.98 On the Network Rail land, the upgrade work referred to in the 2017 nomination is now complete and land is available to relocate the depot. Network Rail confirmed in 2024 that it is still the case that there is potential to become available during the plan period, potentially between 2029 and 2034, subject to relocation of existing uses, but that costs have so far been prohibitive and relocation would require external funding. For this reason, the HELAA assumes this part of the site will not be delivered over the plan period, and it does not therefore count towards the total in the housing trajectory and policy H1. However, as the owners have continued to highlight the potential for the site to become available, it is considered important to retain it within the allocation in case it does come forward.

Are there any main modifications required to the allocation for soundness?

A1.99 No.

CR12a: Cattle Market

What is the background to the site allocation? How was it identified and which options were considered?

A1.100 This site is the former cattle market site. The use as a cattle market ceased many years ago, but the building still holds auctions and hosts a farmers market, and the large external areas are currently used as public car parking. There are also temporary pods for rough sleepers that were put in place during Covid. The site is freehold owned by the Council.

A1.101 It was identified as a development allocation in the 1998 Local Plan for a bus depot, civic amenity site, industrial and retail warehouse uses and community use. Only the bus depot was delivered. In preparing the Reading Central Area Action Plan (RCAAP, adopted 2009) a City Centre Framework document was prepared which recommended wider areas of development and regeneration including this site, which were reflected in the RCAAP as Major Opportunity Areas for development including residential, and this was carried across to the now adopted Local Plan. The updated version of the City Centre Framework from 2008 has been added to the examination library as EX042.

A1.102 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Retail and residential development
- Residential without major retail
- Commercial development

What is the basis for the scale, type, and use proposed? Is it justified?

A1.103 At the stage of preparing the RCAAP there was a proposal that the site may be used to deliver a smaller format edge of centre IKEA store which was part of the company's thinking at the time, and this site was identified as the best candidate, together with residential uses. This was not taken forward and IKEA opened near M4 Junction 12 in 2016. At the Local Plan stage, due to the identified need for retail, the broad allocation including retail uses was retained as it formed a key part of meeting that need. The method used for assessing capacity is not relevant here as the new approach is different.

A1.104 In preparing the LPPU it was clear that there was unlikely to be a need for major edge of centre retail provision, subsequently confirmed through the Commercial Needs Assessment [EV006]. The leaseholder of part of the site, Thimbleby and Shortland also made a submission at call for sites stage in June 2023 supporting a move towards a greater residential emphasis and higher densities. In the 2024 HELAA (site ref AB018) the starting point for this site's capacity was development at residential town centre density of 327 dph resulting in a capacity of 804 dwellings. However, at suitability stage the site area was reduced to allow a 20m buffer to the railway for both noise effects and to allow planting to enhance the green link and treed corridor. 10% of the site was also removed to allow for on-site open space,

resulting in an adjusted capacity of 697 dwellings. Applying 20% for flexibility on either side results in a range of 560-840 dwellings.

A1.105 The site was identified as the best opportunity in this planned wider West Side residential community to deliver healthcare uses, which are currently insufficient in central Reading. The Integrated Care Board in their response at Regulation 18 stage identified the need for a facility to be delivered under CR12. At the time the LPPU was drafted, this site represented the best opportunity to meet those needs, on a site already owned by the Council and where permissions had not already been granted.

What is the site's status in terms of permissions or completions?

A1.106 There are no relevant planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.107 As set out above, the main infrastructure requirement in the policy is the provision of a fitted out primary healthcare unit. This would clearly be a cost to the developer. However, it would also be a major benefit to future residents of the scheme. Our experience is that community units are often provided at the ground floor of major town centre residential proposals but often struggle to find an occupant. This would resolve this issue as long as, through the ICB, a practice could be secured.

A1.108 The main constraint on the site coming forward has always been the requirement in 58 of the Berkshire Act 1986 that means that the Council would need to continue to host the market on the site, despite no cattle market having been held for many years, subject to the below.

“(2) Notwithstanding anything in subsection (1) above, the market shall not be closed or moved from its present site at Great Knollys Street without full consultation with the market traders on all aspects of the closure or move; nor shall it be so moved otherwise than to another site which is reasonably convenient as respects its buildings, facilities and location to buyers and sellers wishing to resort thereto.

3 (a) The Borough Council shall not close the market except after considering a report by a qualified accountant or accountants, appointed specially for the purpose by the Borough Council after consultation with each organisation appearing to them to be representative of market traders in the market upon the financial position of their undertaking in the market and upon its viability and prospects of future viability; and the Borough Council shall make available to the accountant or accountants so appointed all accounts and accounting records relating to the undertaking which are reasonably required for gaining a true and fair view of its financial position.”

A1.109 Essentially therefore there is a route to moving the market but this will require consultation and an alternative, convenient site, or to closing the market subject to an accountants report and consultation with traders. This is a constraint, but it is not considered impossible to find a solution, and ultimately on a site of this scale it would be possible to incorporate a premises of sufficient scale to host the existing farmers

market within a development. Other existing uses on the site are temporary and were commenced with a knowledge that the long-term intention is to develop.

A1.110 Other identified constraints include the green link and treed corridor along the railway line, potential contamination, air quality, noise and light impacts from the railway and potentially nearby commercial uses and the bus depot and flood risk. The site capacity assessment builds in sufficient buffers to overcome some of these issues and others should be capable of being overcome at planning application stage. In terms of flood risk, the Level 2 SFRA for the site [EV038u] considered that residential development should be achievable as the site lies outside Flood Zone 3 but that essential infrastructure may need to be raised above the design flood level.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.111 The site is in the Council's ownership but it cannot currently be regarded as available due to the requirements of the Berkshire Act. However, as described above there is a route to overcoming this issue, and it is therefore considered realistic that the site will become available to allow a development in the long term.

Are there any main modifications required to the allocation for soundness?

A1.112 Yes. It is considered that the policy should reflect the possibility of retaining market uses on site if required. This is set out in Appendix 7.

CR12b: Great Knollys Street and Weldale Street

What is the background to the site allocation? How was it identified and which options were considered?

A1.113 The site comprises former retail warehouse and employment uses west of Caversham Road. Broadly, the site can be divided into the following:

- The area between Great Knollys Street and Weldale Street, which, when originally identified, was made up of small employment sites for industrial, warehouse and offices in multiple ownerships, some of which have now been or are in the process of being redeveloped, as well as a listed Victorian terrace on Caversham Road that would be retained.
- The area south of Weldale Street, which, when identified, contained Iceland and Wickes stores, alongside a modern residential building which would be retained.

A1.114 In preparing the Reading Central Area Action Plan (RCAAP, adopted 2009) a City Centre Framework document was prepared which recommended wider areas of development and regeneration including this site, which were reflected in the RCAAP as Major Opportunity Areas. It was then brought across into the now-adopted Local Plan. The updated version of the City Centre Framework from 2008 has been added to the examination library as EX042.

A1.115 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Primarily residential development
- Residential development with tall buildings
- Mixed use with commercial emphasis

What is the basis for the scale, type, and use proposed? Is it justified?

A1.116 The area was identified as being appropriate for residential-led development, being outside the primary shopping area and main office locations and not representing a clear opportunity for expansion of the commercial elements of the centre. In the 2017 HELAA, the areas not covered by planning permissions at the time (which totalled 25 dwellings and were restricted to the sites now known as 2 and 4 Weldale Street, which have been built out) were assessed using a town centre fringe density of 200 dph but with existing residential and small business units excluded, due to the need to replace small business units in the policy. This resulted in a capacity of 354 dwellings. Applying 20% flexibility margins and rounding to the nearest ten resulted in a range of 280-430 dwellings. However, by the time the hearings were held a planning permission had been granted on the land south of Weldale Street for 427 dwellings (now reduced through non-material amendments to 418). For this reason, a main modification was made to the Local Plan to raise the top of the range to 510 to reflect the increase over assessed capacity due to the permission.

A1.117 In the 2024 HELAA, the site was broken down into 13 constituent parts based broadly on ownership (AB019-AB031) and assessed separately. Three of these sites

(45 Caversham Road – AB019, Unit 16 North Street – AB027, Land at Weldale Street – AB031) had planning permission at the time, and these figures were used for those sites. The other sites were assessed using a town centre density of 327 dph. This resulted in a total initial capacity of 516 dwellings. However, at suitability stage a number of the sites that contained small business units were marked as unsuitable (AB021-22, AB024-25, AB028-29). This is not because they would necessarily be unsuitable for redevelopment in line with the policy in practice but because the policy requirement is for replacement of any small business units lost, which could well result in no net gain in dwellings on these sites. The total capacity after these exclusions was 320 dwellings, which when a 20% flexibility margin on either side is applied and rounded to the nearest ten, results in a range of 260-380.

A1.118 It is worth noting that this is a decrease from the range in the adopted policy because there have already been a number of completions on this sub-area, including 253 south of Weldale Street, prior to 2024, the cut-off for inclusion in the allocation.

What is the site's status in terms of permissions or completions?

A1.119 The area south of Weldale Street is covered by planning permission 17/0326 for a redevelopment of the former Iceland and Wickes for 418 dwellings. Of these, 253 dwellings were completed in 2022-23 and the remaining 165 are under construction and nearing completion.

A1.120 In the area north of Weldale Street, two small residential developments near the junction of Weldale Street and Caversham Road had already been developed at the time of the Local Plan. Since then, a development of 40 dwellings at 45 Caversham Road was permitted (20/1420) and is under construction and nearing completion. A development of 10 dwellings was also permitted in 2023 at Unit 16 North Street (19/1086) but this is currently unimplemented. There are no permissions covering the remaining sites.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.121 There are no particular infrastructure requirements that need to be built into the proposals other than, as set out above, the requirement to retain or replace small business units. This has been factored into the range of the allocation and in practice may mean that some of these sites do not come forward for development in the plan period.

A1.122 Other identified constraints affecting this site include potential contamination, air quality, noise and disturbance and flood risk. Most of these are matters that can be dealt with at planning application stage, and have been dealt with in relation to those sites that have gained permission. In the case of flood risk, a Level 2 SFRA [EV038x] has been carried out which identifies the flood risk (both fluvial and surface water) as being limited to the north part of the site, and this identifies that flood risk is manageable but would need to be considered when placing infrastructure.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.123 The only parts of the site that are considered to be currently available are those where planning permission has been granted. The remainder are in current occupied uses and are therefore likely to be longer term opportunities. However, it should be noted that both 16 North Street and 45 Caversham Road were also occupied employment premises until permission was sought, and that is considered to be the likely pattern in the area north of Weldale Street. Given the fragmentation of land ownership, it is very unlikely that a large development would be brought forward in this area, and it is likely to continue to be piecemeal in nature. This is particularly the case for the small business units, where in some cases individual units are separately freehold owned, making land assembly very complicated. However, these small business unit plots are excluded from the allocation range and are not assumed to deliver in the plan period in the housing target in H1, the housing trajectory or the HELAA. For this reason, there will be delivery in the very short term (those sites in progress) and in both the long term within the plan period and in the longer term/unknown category.

Are there any main modifications required to the allocation for soundness?

A1.124 No.

CR12c: Chatham Street, Eaton Place and Oxford Road

What is the background to the site allocation? How was it identified and which options were considered?

A1.125 The site is made up of six different sites consisting of office buildings, night club, tyre workshop and GP surgery, which collectively represent an under use of a highly accessible site on the fringe of the town centre. It was not identified as part of the major opportunity areas when they were first identified in the City Centre Framework, but its potential was identified in drawing up the Reading Central Area Action Plan (adopted 2009) and it was included as a separate allocation for residential-led development. In the adopted Local Plan, it was brought into the major opportunity area given its clear potential as an extension of that area and the need for sites to be considered comprehensively with one another.

A1.126 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Mixed use extension to the centre
- Residential development (180-260 dwellings)
- Office development

What is the basis for the scale, type, and use proposed? Is it justified?

A1.127 The site is at the very fringe of the town centre and is unlikely to be able to support significant amounts of commercial development, either for offices or retail or related uses. It is therefore appropriate for residential-led development.

A1.128 In the 2017 HELAA, the area already had permission for redevelopment and conversion of 114 Oxford Road and 125 Chatham Street to a total of 23 dwellings. For the remaining land, a town centre fringe density of 200 dph was applied to result in a total capacity for the site of 219 dwellings. Applying 20% flexibility margins in both directions and rounding to the nearest ten results in a range of 180-260.

A1.129 In the 2024 HELAA, each of the constituent sites (ref AB044-49) are assessed separately. With the 114 Oxford Road development completed by this point and 125 Chatham Street permission lapsed, the only outstanding permission at this stage was 115 Chatham Street, which was used as the capacity for that site (AB046). Otherwise, a town centre density of 327 dph was applied to each site. This meant a basic capacity of 286 dwellings for the area. However, a number of adjustments were made at suitability stage. For Eaton House (AB044), a 20m buffer to the Face Bar was removed to account for noise, as was a 5m buffer to Oxford Rd for the identified treed corridor and a 5m buffer to the adjacent listed building to allow for its setting, reducing the capacity of that site by 33 dwellings. For the GP surgery at 121 Chatham Street (AB047), a reduction of 4 dwellings was made to reflect retention of the same level of healthcare floorspace given the importance of healthcare provision in the town centre (403 sq m of existing floorspace). For the 125 Chatham Street site, the site size was reduced by half to allow a 20m buffer to the Face Bar for noise issues, resulting in a further reduction of 13 dwellings. This meant a reduced overall

capacity for the site of 236 dwellings. This was converted to a range by applying 20% flexibility above and below and rounding to the nearest ten, resulting in a range of 190-280.

What is the site's status in terms of permissions or completions?

A1.130 Planning permission (15/0721) for 16 dwellings was granted at 114 Oxford Road in February 2016, and the development was completed in 2022. This site was not therefore part of the HELAA.

A1.131 115 Chatham Street has planning permission (21/0349) for redevelopment for 54 dwellings, granted in December 2021. This is currently under construction.

A1.132 Prior approval has recently been granted in September 2025 at Eaton Court (referred to as Eaton House in the HELAA) for conversion of the office to 52 dwellings (25/1025) and in December 2025 for a roof extension for an additional 15 dwellings (25/1214) which are both currently unimplemented. This would exclude the car park to the rear which would continue to have development potential. This site has considerable planning history, including an expired prior approval for conversion to 58 dwellings and a refused application (21/0639) for redevelopment to 131 dwellings and ground floor commercial over the whole site including the car park.

A1.133 125 Chatham Street has no current permissions, but has been the subject of expired prior approval (17/0979) for conversion to 8 dwellings and a past withdrawn application 20/0752 for two additional storeys for 7 flats.

A1.134 10 Eaton Court was subject to application 20/1104 for a residential redevelopment of up to 8 storeys, which was refused November 2023 and the appeal dismissed October 2024.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.135 There are no particular infrastructure requirements and unusual costs.

A1.136 The site is constrained in part by the relationship of the sites with one another and with surrounding areas which include heritage assets such as the listed Butler public house and 104 Oxford Road and the Castle Hill/Russell Street/Oxford Road conservation area, and in an ideal world a comprehensive development of the whole area would be more likely to maximise the potential of the site and increase permeability. However, the sites are being actively brought forward separately and this means the need for each to be designed carefully.

A1.137 Other identified constraints include the identified treed corridor along Oxford Road, potential contamination, air quality, noise and the potential loss of existing primary care space. These have either been taken into account in assessing the capacity of the site or would need to be taken into account at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.138 Of the six constituent elements of the site in the HELAA, four have been actively promoted through the development management process for development, and one

of these is currently under construction with the remaining three (125 Chatham Street, Eaton Court and 10 Eaton Place) vacant and available for development. Only the GP surgery at 121 Chatham Place and the Face Bar have not been promoted for development so far. As development takes place around these sites, it is considered realistic that these will also come forward, but they are both relatively small in the context of the whole sub-area. As such, delivery of the whole sub-area over the plan period is considered realistic. In Figure 10.1, this will be delivered in each phase of the plan period as the sites are brought forward separately.

Are there any main modifications required to the allocation for soundness?

A1.139No.

CR12d: Broad Street Mall

What is the background to the site allocation? How was it identified and which options were considered?

A1.140 The main part of the site is an ageing shopping centre with three storeys of retail uses and car parking as well as some office uses, including a building (Fountain House) providing an additional eight office storeys on top of the shopping centre. Until the opening of the Oracle in 1999, this was Reading's main covered shopping centre. In addition to the shopping centre the site contains a neighbouring Pentahotel and Queens Court, a former office building that has now been converted to student accommodation, as well as some much smaller buildings adjoining the shopping centre.

A1.141 In preparing the Reading Central Area Action Plan (RCAAP, adopted 2009) a City Centre Framework document was prepared which recommended wider areas of development and regeneration including this site, which were reflected in the RCAAP as Major Opportunity Areas. It was then brought across into the now-adopted Local Plan. The updated version of the City Centre Framework from 2008 has been added to the examination library as EX042.

A1.142 When the site was originally identified, it was proposed for a comprehensive redevelopment. However, as proposals have come forward (see below) it is most likely that this will take the form of additional development mainly on top of the existing shopping centre.

A1.143 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Mixed use with retail and leisure on ground floor
- Retain mall and development on top
- Mixed use with greater office emphasis

What is the basis for the scale, type, and use proposed? Is it justified?

A1.144 As a key town centre site, the appropriate development is for a mix of uses. However, this is not an area where the market is likely to support significant office provision due to not being particularly close to the station, which means that the focus of upper floor development will be residential. The site is also within the identified Western Grouping for tall buildings, which is relevant to the scale.

A1.145 The 2017 version of the HELAA that informed the ranges specified in the existing Local Plan was based on some assumptions around emerging proposals for the site, including that there may be around 250 dwellings on top of the shopping centre.

A1.146 The proposed modification is based on the 2024 HELAA (site refs AB033-38). For the Broad Street Mall (AB033), Fountain House (AB034) and 20 Hosier Street (AB037) the scale of development came from the permissions (either outstanding or expired) at the time. For the Pentahotel (AB038), a footprint ratio of 43% was applied, and nine storeys assumed, with retail uses on the ground floor, leaving eight storeys of

residential floorspace to convert into a dwelling number using 90.4 sq m per dwelling. For Queens Court (AB039) an identical approach was used but without the ground floor retail. The much smaller 19-23 St Mary's Butts assumed 5 storeys on a 64% footprint. This gave a total capacity for the site of 626 dwellings alongside other uses. However at suitability analysis stage both Queens Court and 19-23 St Mary's Butts were removed due to the loss of existing residential or high quality buildings for minimal gain. This led to a final suitable figure of 592 dwellings for the whole site. However, this does not appear to have been represented in a 20% flexibility margin on either side in the range in the LPPU so a main modification is proposed that also considers more recent updates (see below).

What is the site's status in terms of permissions or completions?

A1.147 The main shopping centre was initially granted planning permission (18/2137) in December 2021 for a development of 422 dwellings including three tall buildings primarily above the mall as well as retail and leisure use including some additional floorspace. This has now expired and the mall has changed hands. The new owners applied (24/0173) for a development on a similar basis but including 643 dwellings. This was resolved to be granted subject to Section 106 in October 2025. Work on the Section 106 continues. This latter planning application includes four residential blocks above the mall as follows:

- Building A – 246 dwellings
- Building B – 208 dwellings
- Building C – 154 dwellings
- Building D – 35 dwellings

A1.148 There was also a planning permission for redevelopment of 20 Hosier Street for a 101 bed hotel (18/2054) and a prior approval for conversion of Fountain House to 48 dwellings (21/1177), but these expired in 2022 and 2024 respectively.

A1.149 No permissions have been implemented yet.

A1.150 The whole site fits within the wider Minster Quarter Development Framework SPD adopted in 2018 which endorses many of the principles reflected in the permissions, including tall buildings on the site subject to careful design parameters. A copy of this SPD can be supplied if required.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.151 There are some unusual costs associated with the challenge of additional development on top of an existing, operational shopping centre whilst keeping the centre open and also taking account of the basement space below. There is a podium across part of the site. There is also a complexity with the car park being required to be retained. These issues have needed to be addressed in the permissions for the site. Viability has been addressed as part of the recent planning application.

A1.152 The identified constraints include in particular the wider impacts on heritage from development on this scale adjacent to a conservation area and close to listed

buildings, noise and disturbance from the Inner Distribution Road and evening economy uses on St Mary's Butts, air quality, potential instability relating to the existing podium, the impacts on surrounding character in particular due to the inclusion of tall buildings and the need for retention of existing primary healthcare facilities within the mall. All have been dealt with in the recent resolution to grant, and would be capable of being dealt with at application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.153 The main part of the site, i.e. development above the Mall, is considered deliverable and viable and has only recently been through Planning Applications Committee. The intention is to build it out. No firm dates have been given, and the assumption in the new version of the housing trajectory [EX041] is that one building would be completed per year, starting with the smallest, with first delivery in 2029/30.

A1.154 Regarding the other elements, the prior approval for conversion of Fountain House to residential has expired but there is a realistic likelihood that it could be revived as development occurs to the remainder of the site. The 20 Hosier Street hotel development is not expected to proceed, and it is not considered likely that the Pentahotel site would come forward. The only delivery therefore that counts toward final supply in the new version of the trajectory is from on top of the Mall itself.

Are there any main modifications required to the allocation for soundness?

A1.155 Yes. The existing dwelling ranges do not seem to reflect the outcome of the 2024 HELAA fully, and there have now been significant changes that alter development capacity.

A1.156 The range needs to be based on what is suitable. As of October 2025, this should be the now 643 dwellings as part of the Broad Street Mall application, 48 dwellings from conversion of Fountain House and 122 dwellings from the Pentahotel site, giving a total of 813. However, given that the most recent application at Broad Street Mall has pushed at the boundaries of what is appropriate in tall buildings adjacent to a conservation area and the Grade I listed St Mary's Church, it is not considered appropriate to apply a 20% flexibility margin above to this total figure. The proposed range is therefore 650 (the 813 minus 20% figure rounded to the nearest ten) and 850 (the Pentahotel and Fountain House totals plus 20% (204) plus the Broad Street Mall figure of 643, and rounded to the nearest ten). It is also proposed that it be clarified that this figure relates to the whole site not just the mall itself as the title of the sub-area and the dominance of one part of the site could otherwise suggest this.

CR12e: Hosier Street

What is the background to the site allocation? How was it identified and which options were considered?

A1.157 The site consists of the following elements as the former civic heart of Reading:

- The now demolished site of the former Civic Offices
- The Hexagon Theatre
- The Thames Valley Police Headquarters
- The Magistrates Court

A1.158 Most of the site sits on a podium above car parking.

A1.159 In preparing the Reading Central Area Action Plan (RCAAP, adopted 2009) a City Centre Framework document was prepared which recommended wider areas of development and regeneration including this site, which were reflected in the RCAAP as Major Opportunity Areas. It was then brought across into the now-adopted Local Plan. The updated version of the City Centre Framework from 2008 has been added to the examination library as EX042.

A1.160 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Mixed use development around civic core
- Mixed use with residential focus
- Retail-led mixed use
- Office development
- Residential development

What is the basis for the scale, type, and use proposed? Is it justified?

A1.161 As a key town centre site it is appropriate to include some degree of mixed use. However, this is not an area where the market is likely to support significant office provision due to not being particularly close to the station, which means that the focus of upper floor development will be residential. The site is also within the identified Western Grouping for tall buildings, which is relevant to the scale.

A1.162 The 2017 version of the HELAA that informed the ranges specified in the existing Local Plan was based on retention of the Hexagon and Magistrate's Court, and a 43% site to footprint ratio being used with a seven storey average across the site.

A1.163 For the 2024 HELAA, as for the other MOA sub-areas, the site was split into its constituent parts and assessed separately. For the main former Civic Offices site (AB039), a portion of the site was removed to allow road access and for on site open space, and a 43% site to footprint ratio was applied. Across the site an average of 8 storeys was assumed. Much of the site may be lower, but it would allow for a tall building in addition. Of the remaining floorspace, it was assumed that 33% of ground floor would be for retail uses to activate the open space and key routes, with the

remainder being residential floorspace, converted to dwellings on the basis of one dwelling per 90.4 sq m. For the Hexagon site (ref AB039), the extension permission was used. For the Thames Valley Police (AB041) and Magistrates Court (AB042) sites, the town centre pattern book density of 327 dph were used. This gave a total basic site capacity of 831 dwellings and 3,650 sq m of retail and leisure. This was reduced to 818 dwellings at suitability analysis stage to remove an area of the Magistrates Court required to ensure a green link. Applying 20% flexibility in either direction and rounding to the nearest ten resulted in a range of 650 to 970 dwellings and 2,900-4,400 sq m of retail and leisure.

What is the site's status in terms of permissions or completions?

A1.164 The sole existing permission in the area is 24/0063 granted March 2024 for an extension to the Hexagon Theatre, for which funding was secured through the Levelling-Up Fund. This has not yet commenced.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.165 The most significant additional cost is the complexity provided by the podium across the site. This podium would need to be retained, as there are important accesses and parking and servicing provision for the Hexagon and Broad Street Mall that depend on it. This has been factored into the emerging proposals for the Minster Quarter development.

A1.166 The identified constraints include in particular the wider impacts on heritage from development on this scale adjacent to a conservation area and close to listed buildings, archaeology, noise and disturbance from the Inner Distribution Road, air quality, potential instability relating to the existing podium, the impacts on surrounding character in particular due to the inclusion of tall buildings and the need to retain or move the existing street market. The Development Framework adopted in 2018 deals with a number of these matters, but they would need to be factored into design and/or addressed at application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.167 The former Civic Offices site is Council-owned and the intention is to proceed with a development for the site. A development partner was selected in 2024⁵ and preparations are being made for bringing forward a development, although a planning application is not expected imminently. The constraints including the podium and the need for policy compliant affordable housing were factored into the proposals which led to the selection of a partner and were considered viable at that point. Due to its complexity however, delivery in both the medium and long term is likely and this is reflected in figure 10.1 of the LPPU and the housing trajectory.

⁵ <https://media.reading.gov.uk/news/development-partner-selected-for-regeneration-of-readings-minster-quarter>

A1.168 The Hexagon extension funding has been secured and it is expected to proceed in the short term.

A1.169 Thames Valley Police have very recently completed the conversion of a building in South Reading to a replacement police headquarters to replace the site within this allocation. Whilst no application has yet been made, the known intention is for the site to be brought forward for development.

A1.170 There has never been any intention expressed for the Magistrates Court to leave the site. For this reason, no delivery of any development on this site has been assumed as part of the figures in H1, the housing trajectory or HELAA.

Are there any main modifications required to the allocation for soundness?

A1.171 No.

CR13a: Reading Prison

What is the background to the site allocation? How was it identified and which options were considered?

A1.172 Reading Prison is a Victorian prison building with modern additions, most recently used for young offenders, that is a very significant site for Reading due to various reasons including its location as part of the former abbey precinct and its associations with Oscar Wilde. The site was originally included in the Reading Central Area Action Plan (adopted 2009) to anticipate potential alternative uses if the site was ever to close, in the knowledge that the government at the time were looking at prison provision more generally. In the event the prison was closed in 2014. The allocation was carried into the now adopted Local Plan.

A1.173 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Retain building with residential use
- Retain building with culture/arts use
- Retain building with hotel use
- Retain building with office use
- Convert building and allow significant surrounding development

What is the basis for the scale, type, and use proposed? Is it justified?

A1.174 The main priority here is to find a beneficial use that would secure the retention of this very important historic building rather than meeting any specific development need, given that the prison will be challenging to convert due to its bespoke nature. For this reason, the allocation was drawn to include a wide range of uses that might have included residential, student accommodation or offices to avoid excluding a use that could secure the retention of the building. However, the potential for residential conversion is limited due to the internal layout of the building on a traditional Victorian prison plan based on the Pentonville model (i.e. cells off landings on either side of a void).

A1.175 The approach in the LPPU is therefore to remove further reference to uses other than the inclusion of a cultural, heritage or leisure use that allows some public access to this building that is critical to Reading's heritage. This does not preclude the inclusion of other uses, but they are not assumed at this stage as this would need much more detailed consideration. No additional development in the prison grounds is included due to the very significant archaeological constraints. Therefore the 2024 HELAA (site ref AB043) is based on converting the existing estimated floorspace of the main prison building to a leisure use.

What is the site's status in terms of permissions or completions?

A1.176 There are no permissions covering the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.177 There are no particular infrastructure requirements. The main costs relate to the important heritage considerations, including retaining the building and anticipated restrictions on additional development.

A1.178 By far the most significant constraints relate to heritage. The building itself is listed and is an important feature of Reading's heritage. It is located on the former Reading Abbey precinct, a scheduled monument, meaning that the archaeological implications of any additional development will require very thorough investigation. King Henry I is known to be buried under the Prison site. In addition, there are executed prisoners buried on the site who may have living relatives. Most recently in 2021 a Banksy mural appeared on the outer wall. There are listed buildings, registered parks and the ruins of the former Abbey adjacent to the site. This is the reason that only a conversion or change of use has been assumed at this point.

A1.179 Other constraints relate to noise from the Inner Distribution Road, air quality, surface water flood risk and its location adjacent to green links at the Kennet & Avon Canal and Abbey Ruins.

A1.180 A Reading Prison Framework SPD was adopted in 2015 that sets out many of the above considerations in more detail, and it will be a key aspect of ensuring that any development takes account of these important matters.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.181 The prison use has ceased and the site is being used for some temporary uses. The site was sold by the Ministry of Justice to a new owner in January 2024 who made public his intention to convert the building to a hotel, museum and art gallery⁶. Our understanding is that this will be capable of being funded without needing to rely on a traditional viability approach. The project is being referred to as Reading Recentre⁷. The Council is awaiting a planning application for the proposal and has no firm updates on timelines. Given this context, the short term delivery shown in figure 10.1 is now not considered realistic, and a change is suggested below.

Are there any main modifications required to the allocation for soundness?

A1.182 Yes. Proposed main modifications to the policy and relevant supporting text were agreed in the Statement of Common Ground with Historic England [EX014] to ensure soundness (see Appendix 7).

A1.183 It is also proposed to show the site as being delivered in the medium term in figure 10.1. With no housing delivery on this site assumed, this does not impact on the housing trajectory.

⁶ <https://www.bbc.co.uk/news/articles/czd51r54v6vo>

⁷ <https://www.therecentre.org/>

CR13b: Forbury Retail Park

What is the background to the site allocation? How was it identified and which options were considered?

A1.184 The site consisted when allocated of three groups of retail warehouses – one parade of warehouses north of the Forbury Road/Kenavon Drive roundabout (Phase 1), one further east along the north side of Kenavon Drive (Phase 2) and a Homebase and Toys R Us south of Kenavon Drive. The Homebase and Toys R Us site has recently been redeveloped for residential (Huntley Wharf).

A1.185 A Kenavon Drive Development Urban Design Concept Statement dates from 2004 which envisaged this area as a future residential community. In preparing the Reading Central Area Action Plan (RCAAP, adopted 2009) a City Centre Framework document was prepared which recommended wider areas of development and regeneration including this site, which were reflected in the RCAAP as Major Opportunity Areas. It was then brought across into the now-adopted Local Plan. The updated version of the City Centre Framework from 2008 has been added to the examination library as EX042.

A1.186 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential development with potential retained and expanded retail
- Residential without additional retail
- Allocate for offices
- Development including tall buildings

What is the basis for the scale, type, and use proposed? Is it justified?

A1.187 The long-term aspiration for the Kenavon Drive area has been to establish a residential community in this area, dating back over 20 years. This is part implemented through a number of developments in the area, but is incomplete. This site is too far from the station to be likely to be able to deliver major offices. Some retail would be appropriate on site, and during the Reading Central Area Action Plan examination the prospect of retaining some retail floorspace and incorporating it into a development was raised and this led to a main modification.

A1.188 In the 2017 HELAA, it was assumed that 43% of the site would be covered by building footprint, and that the average height would be six storeys. The existing retail floorspace was a ceiling in the RCAAP policy so it was assumed to be retained, with the remaining space as residential, converted to dwellings using a figure of 94 sq m per dwelling. This resulted in a figure of 1,650 dwellings, and a range of 1,230-1,840.

A1.189 The 2024 HELAA took place midway through the Huntley Wharf development within the site. All 765 dwellings on this site (TH013) were completed by the end of 2024-25. This part was therefore excluded. On the Phase 1 site (TH011), it was assumed that 15% of the site would be required for the on-site open space policy requirement. For the remainder, a footprint to site ratio of 43% was assumed and a seven storey

average across the site (informed by discussions regarding the planning application on this site at the time). It was assumed that 25% of the ground floor would be retained in retail use and that the remaining floorspace would all be residential, converted to dwellings using 90.4 sq m per dwelling. This gave a total for this site of 750, but this was reduced to 702 at suitability analysis stage to allow a 20m buffer to railway line for noise issues and to remove an area covered by TPO. For the Phase 2 site (TH012), the same approach was used but without any retail provision due to its less prominent location and with a six storey average height based on it being further outside the core of the centre. This meant a total for this part of 382 dwellings, and a total for the whole site of 1,084 (702 + 382). With a 20% flexibility margin above and below this and rounded to the nearest ten, this meant a range of 870-1,300.

What is the site's status in terms of permissions or completions?

A1.190 The Huntley Wharf development, comprising all of the land in CR13b south of Kenavon Drive, was completed in the 2024-25 monitoring year (17/0509).

A1.191 Outline application 23/0822 was submitted on the Phase 1 site for redevelopment for up to 820 dwellings and 5,500 sq m of commercial use in June 2023. The application was disposed of on 3 November 2025 due to a lack of progress. A fresh outline application (25/1706) was received on 26 November 2025 for up to 700 residential units and 3,000 sq m of commercial use and is awaiting validation.

A1.192 There is no permission relating to the Phase 2 site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.193 There are no particular infrastructure requirements over and above those that might usually be expected on an urban site of this scale, other than that this is the site in the CR13 area which is expected to deliver an on-site open space to serve the wider area. This has been factored into the development potential for the site. The site is on a slight slope and sits somewhat below the Forbury Road and Kenavon Drive level which adds some complexity and costs where a podium would be part of the solution.

A1.194 Many of the identified constraints relate to the main east-west railway to the north. This has implications for noise, air quality and light pollution, and the banks of the railway include priority habitats and are identified as a treed corridor. In addition, there is archaeological potential, potential contamination, surface water flood risk and protected trees. All of these issues would need to be designed into any development and controlled at planning application stage but would not be likely to prevent development from coming forward. In addition a sewer runs across the site, but agreement had already been reached as part of the process of the now-disposed application to a sewer diversion.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.195 The remaining retail warehouses are still occupied, but this was also the case with the Homebase and Toys R Us units until shortly before they were redeveloped. The intention of the landowners of the Phase 1 site is to bring it forward for a residential-

led redevelopment. The landowners confirmed as part of the HELAA process that the timescale for availability would be 2024-2029. Based on this, development of this part in the medium term is assumed.

A1.196 The consistent position of the landowners of the Phase 2 site is that they do not expect the site to be developed for an alternative use in the plan period. The Council considers that there does remain a possibility it could come forward as surrounding sites are redeveloped and reduces the perception of this area as a retail location, but has assumed this will take place beyond the plan period and no housing delivery is therefore assumed for this site in the plan period in policy H1, the housing trajectory or HELAA.

Are there any main modifications required to the allocation for soundness?

A1.197 No.

CR13c: Forbury Business Park & Kenavon Drive

What is the background to the site allocation? How was it identified and which options were considered?

A1.198 The site is mainly made up of former and existing industrial land, most of which has now been cleared, with a few houses and a museum and restaurant. A Kenavon Drive Development Urban Design Concept Statement dates from 2004 which envisaged this area as a future residential community. In preparing the Reading Central Area Action Plan (RCAAP, adopted 2009) a City Centre Framework document was prepared which recommended wider areas of development and regeneration including this site, which were reflected in the RCAAP as Major Opportunity Areas. It was then brought across into the now-adopted Local Plan. The updated version of the City Centre Framework from 2008 has been added to the examination library as EX042.

A1.199 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Mainly residential development
- Commercial development
- Mixed use

What is the basis for the scale, type, and use proposed? Is it justified?

A1.200 The long-term aspiration for the Kenavon Drive area has been to establish a residential community in this area, dating back over 20 years. This is part implemented through a number of developments in the area, but is incomplete. In the existing Local Plan, the dwelling range for this site was derived from the HELAA, but at examination the landowners made a case that convinced the Inspector that the range should be increased, and it was set at 190-285 dwellings.

A1.201 In terms of the HELAA, the main part of the site is the former Kodak and Ventello site (TR014). For this site, 10% of the site was assumed to be used for open space in accordance with LPPU figure 5.5. The remainder was split into 50% town centre density (327 dph) and 50% urban density (112 dph) to reflect the fact that it transitions from a town centre character towards something less dense and more tranquil. For context, the Huntley Wharf development that adjoins it to the west tops out at 11 storeys whilst the maximum height of the development to the east is 6 storeys. This gives a basic capacity of 409 dwellings, adjusted to 405 to allow a 20m buffer to railway and allow appropriate back to back distances to existing houses at 39-41 Kenavon Drive. The remaining sites (TR015-18) are very small, mainly unsuitable for development and ultimately make no significant difference to the site capacity. The capacity of 405 dwellings was converted using 20% flexibility margins either side and rounding to the nearest ten to a range of 320-490.

A1.202 The site was identified as the best opportunity in this planned wider East Side residential community to deliver healthcare uses, which are currently insufficient in central Reading. The Integrated Care Board in their response at Regulation 18 stage

identified the need for a facility to be delivered under CR13. At the time the LPPU was drafted, this site represented by far the best opportunity to deliver it, as all remaining residential sites already either had permission, an outstanding application or were not expected to be delivered in the plan period.

What is the site's status in terms of permissions or completions?

A1.203 There is no planning permission for this site. The landowners have previously promoted the site for development, and continue to do so in the LPPU, but this has never reached planning permission stage. It is anticipated that an application will be submitted soon, potentially during 2026.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.204 As set out above, the main infrastructure requirement in the policy is the provision of a fitted out primary healthcare unit. This would clearly be a cost to the developer. However, it would also be a major benefit to future residents of the scheme. Our experience is that community units are often provided at the ground floor of major town centre residential proposals but often struggle to find an occupant. This would resolve this issue as long as, through the ICB, a practice could be secured.

A1.205 Many of the identified constraints relate to the main east-west railway to the north. This has implications for noise, air quality and light pollution, and the banks of the railway include priority habitats and are identified as a treed corridor. In addition, there is archaeological potential and potential contamination. All of these issues would need to be designed into any development and controlled at planning application stage but would not be likely to prevent development from coming forward. A sewer passes close to the site and may require an easement. In addition, the site has been identified as being at risk of flooding from both fluvial and surface water sources. The Level 2 SFRA for the site [EV038t] concludes that mixed use development including residential should be possible as the highest flood risk is limited to a small portion of the site.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.206 The landowner of the main part of the site Viridis Real Estate has confirmed through the HELAA process that the site is expected to be available during the plan period in the period 2024-29, and has made representations at Regulation 18 and 19 stage to continue to underline the intention to deliver a residential-led development. At the time it was estimated that 40% would be delivered in 2025 and 60% in 2026 but given that there is no application yet this is clearly no longer realistic. The site is therefore considered likely to be delivered in the medium term 2029-2033.

Are there any main modifications required to the allocation for soundness?

A1.207 No.

CR13d: Gas Holder

What is the background to the site allocation? How was it identified and which options were considered?

A1.208 This site consists of a former gas holder that has now been removed. A Kenavon Drive Development Urban Design Concept Statement dates from 2004 which envisaged this area as a future residential community. In preparing the Reading Central Area Action Plan (RCAAP, adopted 2009) a City Centre Framework document was prepared which recommended wider areas of development and regeneration including this site, which were reflected in the RCAAP as Major Opportunity Areas. It was then brought across into the now-adopted Local Plan. The updated version of the City Centre Framework from 2008 has been added to the examination library as EX042.

A1.209 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Allocate for residential development
- Allocate for commercial development
- Mixed use

What is the basis for the scale, type, and use proposed? Is it justified?

A1.210 The long-term aspiration for the Kenavon Drive area has been to establish a residential community in this area, dating back over 20 years. This is part implemented through a number of developments in the area, but is incomplete. In the case of this site, although within the town centre boundary, it is in a wholly residential context and this is the appropriate use for the site.

A1.211 In the 2017 version of the HELAA, an urban density of 81 dph was applied to the site, leading to a dwelling capacity of 58, to which a 20% flexibility margin in either direction was applied to arrive at a range of 46-70. However, by the time of the 2024 version (site ref TH019) planning permission had been granted for 130 dwellings, so the approach was simply to change the upper end of the range in line with the permission.

What is the site's status in terms of permissions or completions?

A1.212 In July 2021 planning permission (19/0627) was granted for redevelopment for 130 dwellings. The gas holders were removed in the 2021-22 year, and the permission has formally been implemented and all Community Infrastructure Levy paid, but actual construction of dwellings has not yet begun.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.213 The most significant unusual cost for the scheme was the removal of the gas holder and any remediation. This was known and built into the planning application, and the gas holder has now been removed.

A1.214 The main constraints include the main east-west railway to the north which has implications for noise, air quality and light pollution, and the banks of the railway and the Kennet & Avon canal include priority habitats and are identified as treed corridors. In addition, there is archaeological potential, potential contamination, flood risk and the presence of a gas pipeline associated with the former use. All of these issues were addressed at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.215 The site is cleared, ready to develop and the permission has been implemented. Whilst there are some uncertainties around timescale, and the understanding is that the owners may intend to sell the site, it is nonetheless considered available, viable and deliverable and able to be delivered in the short term.

Are there any main modifications required to the allocation for soundness?

A1.216 No.

CR14a: Central Swimming Pool, Battle Street

What is the background to the site allocation? How was it identified and which options were considered?

A1.217 This is the site of the former Central Swimming Pool which has now been demolished. It is currently a cleared site and is Council-owned. There was a permission on the site dating from 2004 for 89 dwellings which expired. The site was included in the now-adopted Local Plan as it was to become available for an alternative use as part of plans to build two new leisure centres at Rivermead and Palmer Park (both now open).

A1.218 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Allocate for residential
- Mixed use
- Commercial
- Education provision
- Allocate for leisure use

What is the basis for the scale, type, and use proposed? Is it justified?

A1.219 The site was (and is) intended to be part of the Council's Local Authority New Build programme, so a residential use was intended. The 2017 version of the HELAA identified that the site should be used for residential at an initial capacity of 110 dwellings based on a town centre fringe density of 200 dph, which was reduced to 97 dwellings after suitability analysis to account for the removal of important utilities and an area to avoid privacy impacts on flats on Bedford Road. Applying 20% flexibility in either direction and rounding to the nearest ten gave a dwelling range of 80-120. By the time of the 2024 HELAA, planning permission for this site (ref AB050) planning permission had been granted (see below) and this formed the basis for the figure used.

A1.220 The proposed change to the policy in LP003b is to identify the treed corridor on Oxford Road and to reduce the minimum number of dwellings to 56 to reflect the planning permission that has been granted, which includes 49 dwellings and 13 supported living units in the C2 use class (with 13 supported living units considered to equate to 7 dwellings based on the approach set out within paragraph A1.3 of the LPPU).

What is the site's status in terms of permissions or completions?

A1.221 The site is wholly covered by planning permission 22/1405, granted in September 2023, for 49 dwellings (including sheltered housing), 13 supported living units and a day centre. It delivers fewer homes than the allocation initially intended due to the inclusion of these other uses. This permission has not yet been implemented.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.222 There are no particular infrastructure requirements and unusual costs. Funding for the development is agreed as part of the Council's housebuilding programme.

A1.223 The identified constraints relate to those in the policy criteria, notably heritage, the scale of surrounding development, noise, air quality, overlooking and potential impact on water infrastructure. These have all been addressed as part of the planning permission.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.224 The site is owned by the Council and is part of the Local Authority New Build programme, which is part funded by right to buy receipts and part by Section 106 contributions. The site is cleared, fully owned by the Council and has no known constraints that would affect viability and deliverability. Enabling works were due to start in November 2025 and development on site is expected to commence during 2026.

Are there any main modifications required to the allocation for soundness?

A1.225 No.

CR14d: 173-175 Friar Street and 27-32 Market Place

What is the background to the site allocation? How was it identified and which options were considered?

A1.226 The Bristol and West Arcade at 173-175 Friar Street is a former covered shopping arcade that is currently closed, formerly with offices above. The site was subject to planning permissions as far back as 2006, and on this basis it was included as an allocated site in the Reading Central Area Action Plan (adopted 2009) and from that document was carried across to the now adopted Local Plan. In preparing that Local Plan, representations were made from the owners of the site to extend the allocation to include the adjacent 27-32 Market Place site in the same ownership, consisting of a listed vacant pub building (the Coopers Arms, which closed in 2013). The allocation was therefore extended to allow a combined proposal to come forward.

A1.227 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential
- Offices
- Retail
- Leisure
- Offices with ground floor retail uses
- Residential with ground floor retail/offices
- Leisure with ground floor retail

What is the basis for the scale, type, and use proposed? Is it justified?

A1.228 At Local Plan stage, for 173-175 Friar Street, a development on a footprint of 66% of plot area was assumed, with a height of five storeys and ground floor retail. The resulting residential floorspace was assumed to be converted to residential at 94 sq m per dwelling, resulting in a capacity of 38 dwellings. For 27-32 Market Place a conversion of upper floors to residential resulting in 15 dwelling was assumed.

A1.229 In the 2024 version of the HELAA, the capacity was based on the existing planning permissions across the site. This involved a conversion to 26 dwellings at upper floors of 173-175 Friar Street (ref AB052) and a conversion including delivery of 8 dwellings on 27-32 Market Place (ref AB053). This gives a total of 34 dwellings. The approach was to adjust the existing range because this would otherwise fall below the bottom end of the range.

What is the site's status in terms of permissions or completions?

A1.230 There are various planning permissions that have related to the Bristol and West Arcade/173-175 Friar Street over recent years, but most recently a prior approval (22/0579) was granted in June 2022 on 173-174 Friar Street for conversion of upper floors to 20 dwellings, and a prior approval (22/0577) was granted in July 2022 for 175 Friar Street for conversion of upper floors to 6 dwellings. Both of these were

completed in 2024-25 for a total of 26 dwellings, and the only outstanding element on the 173-175 Friar Street element of the site is any ground floor refurbishment or change of use and reopening of the arcade, for which there is no current planning permission.

A1.231 In terms of 27-32 Market Place, a permission (22/0545) for conversion to 8 dwellings at upper floors, demolition and retention of ground floor commercial was granted in November 2023 and was not yet implemented at the last visit in spring 2025. Works to secure the site and prevent deterioration of the listed building had been undertaken in previous years.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.232 There are no particular infrastructure requirements. Particular costs mainly relate to bringing a listed building back into use. These have been factored into the various planning permissions. The policy also seeks to retain and reopen the arcade, and this may have some implications for viability, but not in a way that impacts the delivery of any dwellings or floorspace to meet needs.

A1.233 The identified constraints relate to those in the policy criteria, notably the impacts on heritage assets, archaeology, noise and air quality. These were dealt with in respective permissions insofar as the prior approval route is able to consider them.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.234 Permissions exist across the site that would deliver most of the development except for any ground floor commercial change of use or redevelopment at 173-175 Friar Street, much of which has been completed. Remaining parts of the site are vacant and available, and changes would mainly be to existing floorspace rather than any significant new build. It is therefore considered to be realistic in the short term.

Are there any main modifications required to the allocation for soundness?

A1.235 Yes. A proposed main modification was agreed in the Statement of Common Ground with Historic England [EX014] to ensure soundness (see Appendix 7).

CR14g: The Oracle Riverside East

What is the background to the site allocation? How was it identified and which options were considered?

A1.236 This site comprises two parts of the Oracle Riverside on either side of the Kennet & Avon Canal comprising the former Debenhams store on the north side and the Vue Cinema on the south side. This has been adapted and significantly altered from the allocation in the existing Local Plan and it includes some but not all of the same land.

A1.237 Originally this allocation was the result of the owners of the Oracle promoting it for an extension through the Reading Central Area Action Plan (adopted 2009). The proposal at the time was for the whole Oracle riverside area south of the Kennet & Avon Canal to be redeveloped for retail and for the car parking to be reprovided on the John Lewis depot site south of Mill Lane (now CR14r). The Debenhams site was not part of the allocation. When it came to the now adopted Local Plan, the Oracle's owners wanted additional options for expansion but were not able to identify where and how this would take place, meaning that the allocation was retained from the RCAAP largely unchanged.

A1.238 However, at LPPU stage it was clear that there was no realistic prospect of the existing allocation being implemented. Instead, the intention was for redevelopment of the two sites now proposed to form the allocation for commercial uses and residential above. Planning applications on both sites had already been submitted, and the Oracle's response at Regulation 18 stage also confirmed this. Meanwhile the John Lewis depot site was promoted as a separate allocation (see CR14r).

A1.239 The options identified and which were subject to sustainability appraisal were as follows:

- Redevelopment for mixed residential and commercial, including retail and/or leisure at the ground floor.
- Do not allocate (remains as existing)
- Redevelopment for mostly commercial and/or leisure use
- Redevelopment for mostly residential use

What is the basis for the scale, type, and use proposed? Is it justified?

A1.240 The past allocation is not relevant here, so this focuses on how the proposed LPPU allocation was assessed. The clear intention of the landowner was to bring these sites forward for a mix of commercial and residential. Commercial uses at the ground floor would be essential to complement the use of the Oracle riverside, an important area of public space in Reading. However, alternative upper floor uses such as offices would be unlikely to be deliverable given that this is not a part of the town centre where the office market was strong.

A1.241 The 2024 HELAA splits this into two sites – the former Debenhams (ref AB097) and the Vue Cinema site (AB055). For the former Debenhams, a footprint to site area ratio of 43% was used. It was assumed that a development of 8 storeys would be appropriate, taking account of the fact that the existing Oracle already reaches a reasonable height, but also that the development is adjacent to a conservation area.

It was assumed that 50% of the ground floor would be commercial uses, with the remaining floorspace as residential, converted to dwellings using a figure of 90.4 sq m per dwelling. This results in a site capacity of 200, but this was reduced to 190 to account for the 5% of the site that is in Flood Zone 3 being removed. For the Vue Cinema site a similar approach was used, but it was assumed that development would be 7 storeys as this site is more prominent in the conservation area, and that the whole of the ground floor would be commercial and the first floor would be a replacement cinema. This resulted in a figure of 126 dwellings, again reduced by 5% to account for the proportion of the site in Flood Zone 3. Across the whole site therefore the total dwelling capacity was assessed as 316, which, after applying a 20% flexibility margin on either site and rounding to the nearest ten results in a range of 250-370. In terms of commercial floorspace, the resulting figures from this approach are a net loss overall, so no floorspaces are mentioned.

What is the site's status in terms of permissions or completions?

A1.242 There are no planning permissions in place. Planning application 22/1916 was submitted in December 2022 for mixed use development comprising for 218 dwellings, commercial uses and reconfiguration and change of use of existing floorspace to commercial or leisure. Alongside this, planning application 22/1917 was also submitted in December 2022 on the Vue Cinema site for mixed use development of up to 247 dwellings, cinema and commercial uses. The developments were considered at Planning Applications Committee on 3 December 2025, although by now the total dwellings across the site had reduced to 436, with a recommendation to grant subject to Section 106, but they were deferred.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.243 The main infrastructure requirements for this site relate to ensuring public realm improvements, and this has been advised throughout and would need to be built into any development. This is considered wholly reasonable for developments of this scale that front onto public spaces. There are existing uses and the developments will be complex, so there are multiple costs, but this has been factored into the proposals.

A1.244 The identified constraints relate to those in the policy criteria, notably flood risk, the location adjacent to the conservation area and close to listed buildings, the treed corridor along the Kennet & Avon Canal, archaeological potential, noise and air quality. These have been taken into account in setting the development potential, and some will need to be addressed at planning application stage. In the case of flood risk, the site is subject to a Level 2 SFRA [EV038a], which confirms that mixed use development should be possible but that infrastructure should be located outside Flood Zone 3. In reality this would be straightforward because the areas in Flood Zone 3b and 3a are along the banks of the river, which are retained public routes and would not see any development.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.245 The site is considered to be available, viable and deliverable. The current planning applications on the site confirm the intention to develop, and this is further underlined by the responses of The Oracle to the LPPU consultations. Viability has been assessed in considering the affordable housing provision in the current planning applications. Although a firm timescale for delivery has not been given, taking the progress of the applications so far into account, delivery in the medium term (up to 2033) is considered realistic.

Are there any main modifications required to the allocation for soundness?

A1.246 Yes. A proposed main modification was agreed in the Statement of Common Ground with Historic England [EX014] to ensure soundness (see Appendix 7).

A1.247 The response from The Oracle at Regulation 19 stage proposes the addition of text to expand the references to retail and leisure to include appropriate footfall generating uses. This is considered to assist with soundness by ensuring an appropriate level of flexibility and this modification is proposed in Appendix 7.

CR14h: Central Club, London Street

What is the background to the site allocation? How was it identified and which options were considered?

A1.248 The site consists of a former community centre which has been closed for some years. It was initially included in the Reading Central Area Action Plan (adopted 2009) and identified as it was a Council-owned development opportunity. It was then carried forward into the Local Plan.

A1.249 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential (15-30 dwellings)
- Higher density residential development (approximately 40 dwellings or more)
- Offices
- Ground floor retail and upper floors residential
- Ground floor retail and upper floors offices
- Retail.

What is the basis for the scale, type, and use proposed? Is it justified?

A1.250 The site was initially identified for primarily residential as London Street has increasingly moved from office towards residential uses over the last 20 years. In the 2017 HELAA a town centre fringe residential density of 200 dph was applied resulting in a potential for 10 dwellings, which was expressed as a range of 8-12 with 20% flexibility on either side. However, by the 2024 HELAA, this site (ref KA002) had a resolution to grant permission for 17 dwellings and 134 sq m community use (a net loss of 361 sq m), and this was therefore used as the basis with 20% flexibility on either side.

What is the site's status in terms of permissions or completions?

A1.251 Planning permission (22/1364) was granted in October 2024 for development for 17 dwellings and 134 sq m community space. This is not yet implemented. An application to vary conditions is currently under consideration.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.252 There are no particular infrastructure requirements and no unusual costs.

A1.253 The main constraints to development are around the need to retain the prominent black history mural on the side of the building and the site's location in a conservation area. The identified constraints relate to those in the policy criteria, notably archaeology, noise from the Inner Distribution Road and air quality. All of these were addressed as part of the permission.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.254 The site has planning permission and is available for development now. It was able to viably support a 30% affordable housing contribution. It is considered that it is likely to be delivered in the short term.

Are there any main modifications required to the allocation for soundness?

A1.255 No.

CR14i: Enterprise House, 89-97 London Street

What is the background to the site allocation? How was it identified and which options were considered?

A1.256 The site consists of a listed office building. The site was originally identified as an opportunity in preparing the Local Plan as it had been a lapsed permission for conversion to 10 dwellings. Following this it was included as an allocation in the now-adopted Local Plan.

A1.257 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential (8-12 dwellings)
- Higher density residential (at least 20 dwellings)
- Mixed use (ground floor retail and office and upper floors residential)

What is the basis for the scale, type, and use proposed? Is it justified?

A1.258 The Local Plan was based on 2017 HELAA which in turn was based on the lapsed permission for 10 dwellings, to which 20% flexibility in either direction was applied to arrive at a range of 10-12. In the 2024 HELAA (ref KA003), the approach was instead to apply general conversion rates of 64 sq m per dwelling, which gave a figure of 11. The same 20% flexibility was applied to give a range of 9-13 dwellings.

What is the site's status in terms of permissions or completions?

A1.259 There are no planning permissions covering the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.260 There are no particular infrastructure requirements and the main cost would be a sensitive conversion of the existed listed building.

A1.261 Other than the heritage asset issues, the identified constraints relate to air quality and noise, which would be capable of being addressed at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.262 The building is currently occupied, and there has been no confirmation of availability. Given the past permission and the general move from office to residential across much of London Street, it is considered to have a realistic prospect of coming forward. However, to reflect this fact it is proposed that a main modification be made to Figure 10.1 to place this proposal in the long term.

Are there any main modifications required to the allocation for soundness?

A1.263 Yes. A proposed main modification was agreed in the Statement of Common Ground with Historic England [EX014] to ensure soundness (see Appendix 7).

CR14j: Corner of Crown Street and Southampton Street

What is the background to the site allocation? How was it identified and which options were considered?

A1.264 The site is a longstanding allocation that was present in the 1998 Local Plan. It is one of Reading's few long-term derelict sites. It was brought into the Reading Central Area Action Plan (adopted 2009) and then the now-adopted Local Plan.

A1.265 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential development (10-20 dwellings)
- Higher residential development (approximately 35 dwellings or more)
- Mixed use (ground floor retail/office and upper floors residential)
- Offices

What is the basis for the scale, type, and use proposed? Is it justified?

A1.266 The site is on the very edge of the town centre and has limited potential for commercial uses. It has always been an allocation for residential development. In the 2017 HELAA that underpinned the existing Local Plan, a town centre fringe density of 200 dph was applied resulting in a capacity of 16 dwellings, which meant a range of 13-19 dwellings after applying 20% flexibility margins either side. In the 2024 HELAA (ref KA004) a different approach was used to reflect the density of the completed development at the nearby Crown Street/Silver Street corner (234 dph), which is a complementary development on a similar important corner on an approach road to Reading. This resulted in a capacity of 19 dwellings. However, the need to make an allowance for the treed corridor along Southampton Street resulted in this being reduced to 16, and no change being made to the dwelling range in the policy.

What is the site's status in terms of permissions or completions?

A1.267 There are no permissions on the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.268 There are no particular infrastructure requirements and unusual costs.

A1.269 The identified constraints relate to those in the policy criteria, notably the presence of a nearby listed building north of Crown Street, archaeological potential, the treed corridor along Southampton Street, noise and air quality. The treed corridor is factored into development potential, whilst the other matters would need to be considered and potentially mitigated at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.270 The site is fully cleared and is mainly in Council ownership. It has most recently been used to support construction of the adjacent 79-81 Southampton Street development

which is virtually complete. The site is considered likely to be realistically available for development, and the LPPU assumes that this is most likely to occur in the medium term.

Are there any main modifications required to the allocation for soundness?

A1.271 No.

CR14I: 187-189 Kings Road

What is the background to the site allocation? How was it identified and which options were considered?

A1.272 The site is a listed office building in the Eldon Square conservation area, one of a series of similar buildings north of Kings Road. It was identified during preparation of the Reading Central Area Action Plan (adopted 2009) and was included as an allocation in that document. We cannot find the records of how it came to be known but it is most likely to have been through pre-application discussions.

A1.273 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Changes of use (offices to residential or student accommodation)
- Mixed use (office/retail on ground floor and residences above)

What is the basis for the scale, type, and use proposed? Is it justified?

A1.274 The site has always been allocated for some form of residential but given its location adjacent to an existing student accommodation block, student accommodation may also be suitable in line with policy H12. In the 2017 HELAA that underpinned the existing Local Plan, the dwelling total was based on pre-application advice that had previously been given that conversion of the existing building could accommodate 27 student studios. With a 20% flexibility margin on either side this would mean a range of 22-33. However, this is very dependent on studio accommodation, and that is not actually specified by the allocation. The 2024 version of the HELAA (site ref TH020) therefore applied a more general conversion rate of 64 sq m per dwelling to result in a dwelling total of 14, to which the 20% flexibility margins are applied to arrive at a range of 11-17.

What is the site's status in terms of permissions or completions?

A1.275 There are no planning permissions covering the site. An application for conversion and extension for student accommodation was refused in 2017, but it was the extension element of this involving a listed building that was the most important factor.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.276 There are no particular infrastructure requirements and the main cost would be a sensitive conversion of the existed listed building.

A1.277 Other than the heritage asset issues, the identified constraints relate to air quality and noise, which would be capable of being addressed at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.278 The building is currently occupied, and there has been no confirmation of availability. Given the past developer interest and the fact that similar listed office buildings north

of Kings Road have already been converted to residential, it is considered to have a realistic prospect of coming forward. It has been suggested that an application for conversion to student accommodation may come forward in 2026. However, to reflect the uncertainty it is proposed that a main modification be made to Figure 10.1 to place this proposal in the long term.

Are there any main modifications required to the allocation for soundness?

A1.279 Yes. A proposed main modification was agreed in the Statement of Common Ground with Historic England [EX014] to ensure soundness (see Appendix 7).

CR14m: Caversham Lock Island and Caversham Weir, Thames Side

What is the background to the site allocation? How was it identified and which options were considered?

A1.280 This site consists of an island in the River Thames along with adjoining weir and footbridge. The island was initially put forward by its owners, the Environment Agency, to the Council as an opportunity outside the plan process and the Caversham Lock Development Principles SPD covering this and an adjacent (now complete) site was adopted in 2006. This led to its inclusion in the Reading Central Area Action Plan (adopted 2009) and it was then carried across to the Local Plan. At Local Plan stage, the potential for inclusion of hydropower as part of an emerging proposal was highlighted and this was added to the allocation.

A1.281 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Development for water-compatible leisure or tourism uses, including some operational development
- Residential development.

What is the basis for the scale, type, and use proposed? Is it justified?

A1.282 The site was mainly in the functional floodplain when allocated, and this meant that only water compatible uses would be appropriate. Although assessed flood risk on the site has reduced somewhat this is still not considered appropriate for anything other than leisure or tourism uses associated with the river or operational development as it represents an island of lower flood risk only. The figure is an estimation that has been used since it was included in the RCAAP.

What is the site's status in terms of permissions or completions?

A1.283 Hydropower generation at the weir was granted permission (15/1715) in May 2017, and was completed during 2020-21. No planning applications have been received for the remainder of the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.284 There are no particular infrastructure requirements. The location on the island without road access would likely present an additional cost to any development.

A1.285 The identified constraints relate to those in the policy criteria, notably flood risk, important trees on site, the setting of the listed Thames Lido (formerly Kings Meadow Pool), archaeology, the biodiversity value of the Thames, and the need to retain public access and the operation of the weir. These were all either taken into account in the initial allocation or would need to be addressed at application stage. There is a Caversham Lock Development Principles SPD adopted in March 2006 which gives further guidance.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.286 There is no information on the availability, viability or deliverability of the site. Due to the small scale and the fact that the purpose of this allocation is enhancement of the riverside rather than meeting any assessed needs this is not considered to be a significant issue.

Are there any main modifications required to the allocation for soundness?

A1.287 No.

CR14n: Reading Central Library, Abbey Square

What is the background to the site allocation? How was it identified and which options were considered?

A1.288 This is the current central library site owned by the Council. There are current works underway to provide a new library as an extension of the Civic Offices on Bridge Street and once complete the current library site will become available for development, so the site was highlighted through internal discussions in preparing the LPPU. The site was a previous allocation in the Reading Central Area Action Plan when previous proposals for reprovision of the library were being considered, but was not carried across to the Local Plan when those proposals were abandoned.

A1.289 The options identified and which were subject to sustainability appraisal were as follows:

- Residential-led development at former library site.
- Do not allocate
- Commercial development including office and ground floor retail and related uses

What is the basis for the scale, type, and use proposed? Is it justified?

A1.290 The site is outside the main commercial core of the centre, meaning that residential development is most likely to be appropriate. Although the site is within the Eastern Grouping for tall buildings, the identified number of tall buildings to be delivered in that grouping have already been provided. In the 2024 HELAA, a town centre density of 327 dph was applied to the site (ref AB061) resulting in a capacity of 33 dwellings, but at suitability analysis stage the site size was reduced to remove the brook and banks to allow it to be deculverted, which would address the green link and flood risk issues identified at suitability stage. Applying 20% flexibility on either side would give a range of 22-32 dwellings.

What is the site's status in terms of permissions or completions?

A1.291 There are no planning permissions covering the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.292 There are no particular infrastructure requirements associated with the development. There would be some potential unusual costs, however. The site sits on part of the former Abbey scheduled monument meaning that any redevelopment would need to address the archaeological issues thoroughly. In addition, the Holy Brook runs through the middle of the site and the existing building straddles the brook.

A1.293 The identified constraints relate to those in the policy criteria, notably archaeology, the setting of the adjacent conservation area, noise, air quality and contamination. A proposed main modification (see below) is proposed that will address the archaeological issues. In terms of flood risk, since the only fluvial flood risk is within the course of the brook itself, this has not been identified as a particular constraint,

and the development capacity is assessed on the basis of no development taking place in the areas of fluvial flood risk.

A1.294 The option remains open to change the use of the existing building rather than redevelop, which would overcome many of the constraints with minimal issues. The HELAA tables (see the Stage 2a Devt Potential tab) assess this as a scenario and consider that this might actually deliver around 37 dwellings, but this would clearly need further investigation particularly since the large floorplates of a library format may not convert easily.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.295 The development of the new library as part of the Civic Offices is well underway and is expected to complete in the first half of 2026. Once that has occurred, the existing site will become available. The Council intends to bring this forward as a development site, and given that the site will be available shortly, it is considered realistic that this is in the medium term.

Are there any main modifications required to the allocation for soundness?

A1.296 Yes. Proposed main modifications were agreed in the Statement of Common Ground with Historic England [EX014] to ensure soundness (see Appendix 7).

CR14o: 100 Kings Road

What is the background to the site allocation? How was it identified and which options were considered?

A1.297 100 Kings Road is an existing serviced apartment building. It was initially identified as part of the HELAA process as there is an expired permission for change of use of 9 of the serviced apartments to dwellings, but was not initially included in the plan as it fell below the 10 dwelling threshold. However, a planning application was made in March 2024 for change of use of 41 additional serviced apartments to dwellings.

A1.298 The options identified and which were subject to sustainability appraisal were as follows:

- Conversion from serviced apartments to residential.
- Do not allocate (retain existing use)
- Redevelopment to residential use at more general town centre or edge of centre densities

What is the basis for the scale, type, and use proposed? Is it justified?

A1.299 The proposal is for conversion of serviced apartments to residential. Serviced apartments is not something that meets a particular need that the Local Plan is addressing, and this is considered to be acceptable in principle, subject to other material considerations. The number of apartments available to convert dictates how many dwellings would result, which in this case is 50.

What is the site's status in terms of permissions or completions?

A1.300 There are no current permissions on the site. Planning permission 15/1119 allowed for conversion of 9 serviced apartments to dwellings but this has expired. Application 24/0313 for change of use of 41 further serviced apartments to dwellings was refused in September 2024. One of the key reasons for refusal was the assertion as part of that application that the previous permitted change of use under 15/1119 had already occurred, contrary to the Council's evidence through its Council Tax function, which had knock-on effects on the acceptability of the proposal. There were other reasons for refusal relating to the specific proposal, but the principle of change of use to residential is still considered to be appropriate.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.301 There are no particular infrastructure requirements and unusual costs. This would be a relatively straightforward change of use within minimal if any internal works.

A1.302 The identified constraints relate to those in the policy criteria, notably noise and air quality. These could be addressed at planning application stage and may not require significant mitigation at all depending on the existing arrangements for the serviced apartments. Parts of the site area itself are in areas at risk of flooding from fluvial and surface water sources but these mainly relate to the rear car park and will not be of relevance for a change of use of existing floorspace that is already used for a form of residential accommodation.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.303 The previous planning application made clear the intention to change the use of the serviced apartments to dwellings. This would require minimal physical works and any viability issues would mainly relate to market conditions and anything included as part of a Section 106 agreement. The landowner also confirmed that the site is currently available when contacted as part of the HELAA process in 2024. This is therefore likely to be viable and deliverable. There are no firm timescales for this to take place, and delivery in the medium term is assumed.

Are there any main modifications required to the allocation for soundness?

A1.304 No.

CR14p: Queens Wharf, Queens Road

What is the background to the site allocation? How was it identified and which options were considered?

A1.305 Queens Wharf is a former office building that was converted to flats many years ago, but some office space was retained at ground floor and basement level and was Council-owned. It was identified following internal discussions during LPPU Regulation 19 preparation as an opportunity for residential conversion.

A1.306 The options identified and which were subject to sustainability appraisal were as follows:

- Conversion of ground floor office use to residential
- Do not allocate (retain existing office use)

What is the basis for the scale, type, and use proposed? Is it justified?

A1.307 As the site is already in office use it was considered as a residential conversion. In the 2024 HELAA (ref AB103), using an estimate of 705 sq m remaining office floorspace and converting that to dwellings on the basis of 64 sq m per dwelling resulted in a capacity of 11 dwellings. With 20% flexibility on either side this became a range of 9-13.

What is the site's status in terms of permissions or completions?

A1.308 The site, by then in private hands, was granted prior approval (24/1496) for conversion to 7 dwellings in January 2025. By the end of 2025 conversion was underway.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.309 There are no particular infrastructure requirements and unusual costs. The constraints were mainly around air quality and noise impacts from the location next to Queens Road, but this was a prior approval where these matters are not to be considered.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.310 The site is available, viable and deliverable and is underway now. The updated housing trajectory (developed before the site was known to be underway) assumes delivery in 2027/28 but it may be earlier.

Are there any main modifications required to the allocation for soundness?

A1.311 No.

CR14q: Havell House, 62-66 Queens Road

What is the background to the site allocation? How was it identified and which options were considered?

A1.312 The site is an existing office building. It was identified through expired planning permissions for conversion to residential.

A1.313 The options identified and which were subject to sustainability appraisal were as follows:

- Conversion from office use to residential use
- Do not allocate (retain existing office use)
- Redevelopment for residential development at more general town centre or edge of centre densities

What is the basis for the scale, type, and use proposed? Is it justified?

A1.314 Expired permissions on the site are for conversion of office to residential. Queens Road has been one of the main concentrations of such conversions in recent years, and office floorspace in the area has substantially reduced, indicating that the area is no longer considered an office location in the long term. The 2024 HELAA assumes a conversion using a figure of 64 sq m per dwelling, based on other permitted conversions. The reason that the figure from the expired permission was not used is because many of these were prior approvals under the previous regime and would not have considered dwelling sizes, but in practice the dwelling total from the expired permissions was almost identical. This was converted to a dwelling range of 14-20 by applying a 20% flexibility on either side.

What is the site's status in terms of permissions or completions?

A1.315 Previous consents have been for individual floors. At the current time, the third floor has planning permission (24/0085) for change of use to 2 dwellings and permission has very recently been granted (6 January 2026) for the change of use of the second floor to 3 dwellings. In the past, all floors have had a consent at the same time. There is a current planning application (25/1850) received in December 2025 for an alternative conversion of the second floor to 3 dwellings.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.316 There are no particular infrastructure requirements and unusual costs.

A1.317 The identified constraints relate to those in the policy criteria, notably noise from the road and air quality. Depending on the consent route, these may not even need to be considered if a prior approval is sought.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.318 The site is currently occupied and no details on availability or timescales have been provided through the HELAA process, but a query with the agent suggest that works on the permitted third floor may begin early in 2026. Given the past interest in a

residential permission it is considered that the site will potentially become available in the plan period, and in any case office to residential changes of use are very much the trend in the Queens Road area. This would need primarily internal changes, shown to be deliverable in past consents. It is therefore considered to be realistic.

Are there any main modifications required to the allocation for soundness?

A1.319No.

CR14r: John Lewis Depot, Mill Lane

What is the background to the site allocation? How was it identified and which options were considered?

A1.320 The site consists of a depot building used by John Lewis as a warehouse and customer collection point. The site was part of the CR14g Oracle extension site included in the Reading Central Area Action Plan and then Local Plan, which is described in relation to that site in this Statement. It was nominated for inclusion in the LPPU as part of the call for sites exercise in 2023 by the landowner, John Lewis, as a development for around 200 build-to-rent dwellings and was consulted upon as part of the Consultation on Scope and Content [LP008].

A1.321 The options identified and which were subject to sustainability appraisal were as follows:

- Redevelop warehouse for 200 build to rent dwellings
- Do not allocate
- Retain as part of existing allocation (CR14g)
- Residential development at more general town centre or edge of centre densities (75-125 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

A1.322 The clear landowner/developer intention is for this site to be developed for residential. The use as part of the existing allocation has no real prospect of being implemented. Therefore, the site was assessed through the 2024 HELAA for residential development (site ref KA001). Town centre densities of 327 dph were applied to the site resulting in an initial capacity of 121 dwellings, but at suitability stage particular sensitivities were identified at the eastern end of the site given its proximity to the conservation area. For this reason, the easternmost third of the site was assumed to be developed at urban densities of 112 dph, resulting in an adjusted capacity of 95 dwellings. Applying a 20% flexibility margin on either side, and rounding to the nearest ten for figures above 100 resulted in a range of 76-110.

What is the site's status in terms of permissions or completions

A1.323 Planning application 24/1155 was submitted in September 2024 for redevelopment for 170 build to rent residential dwellings. Planning Applications Committee on 25 October 2025 resolved to grant permission subject to completion of a Section 106 agreement. Work on the Section 106 agreement is underway and a draft was provided to the applicant in November 2025.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.324 There are no particular infrastructure requirements and unusual costs.

A1.325 The identified constraints relate to those in the policy criteria, notably the impact on the nearby conservation area and listed buildings, potential archaeology, noise, air

quality and contamination. These were all addressed as part of the planning application.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.326 The site is in the ownership of the developer and is therefore considered available and deliverable. It is understood that the intention is to be on site in 2026. Viability was considered as part of the planning application process. John Lewis consider this as an exemplar of their own build to rent model and intend to progress with the development. Given this context, delivery in the medium term (2028-2033) is assumed.

Are there any main modifications required to the allocation for soundness?

A1.327 Yes. A proposed main modification was agreed in the Statement of Common Ground with Historic England [EX014] to ensure soundness (see Appendix 7).

A1.328 Given that the development which has been found to be suitable (subject to Section 106) consists of 170 dwellings it is proposed that, in order to be justified, the upper limit of the dwelling range be adjusted in line with this figure.

CR14s: 20-22 Duke Street

What is the background to the site allocation? How was it identified and which options were considered?

A1.329 The site is a former public house that has been vacant for many years. It was put forward to the Council as an opportunity through the Regulation 18 response to the LPPU by the owners Samuel Smith Old Brewery (Tadcaster) to deliver around 30 dwellings.

A1.330 The options identified and which were subject to sustainability appraisal were as follows:

- Redevelopment for residential use
- Do not allocate, retain existing use (offices)
- Redevelopment for mixed commercial and residential use

What is the basis for the scale, type, and use proposed? Is it justified?

A1.331 The proposal is for residential use. As the site is in a conservation area where it is identified as a building of townscape merit in the conservation area appraisal, the 2024 HELAA (site ref AB099) initially considered it for a conversion to residential which, on the basis of one dwelling per 64 sq m, results in a capacity of 11 dwellings. For comparison, a redevelopment at a town centre density of 327 dph would have resulted in 26 dwellings (without any allowances being made for issues raised at suitability stage). However, at suitability analysis stage opportunities for extension were identified, which, after accounting for flood risk, TPO trees and a buffer to the river, left an available area that at an urban density of 112 dph (more appropriate to the existing building) raised the site's capacity to 15 dwellings. Applying a 20% flexibility margin either side results in a range of 12-18 dwellings.

What is the site's status in terms of permissions or completions?

A1.332 There are no planning permissions on this site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.333 There are no particular infrastructure requirements. Costs would mainly relate to the requirement to convert the existing building rather than redevelop, but this is considered vital in the context of the conservation area.

A1.334 The identified constraints relate to those in the policy criteria, notably protected trees, the nearby scheduled monument of the High Bridge, the location in the conservation area and within the setting of listed buildings, archaeological potential, noise and air quality. Flood risk is missing from the list but does impact the site. Where these issues are likely to impact on development capacity or form of development, these have been taken into account in the HELAA process. Others are capable of being addressed at planning application stage. In the case of flood risk, the Level 2 SFRA for the site [EV038e] concludes that, as only a small proportion of the site is located in Flood Zone 3a with the majority in Flood Zone 1 a residential development should

be possible. It also notes that pluvial flood risk should be considered when locating infrastructure.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.335 The site has been vacant for many years and is considered to be available, and this was confirmed by the owner through the HELAA process. The response at Regulation 19 stage from the owner states that *“The site would not suffer from any significant planning, legal or ownership constraints, and would thus be capable of delivering homes within the early part of the plan period”*. On this basis the owner considers it should be moved to the short term delivery category, but as this feeds into five year supply and national policy does not expect sites without full permission to generally be in this category, it is considered it should remain in the medium term category.

Are there any main modifications required to the allocation for soundness?

A1.336 Yes. A proposed main modification was agreed in the Statement of Common Ground with Historic England [EX014] to ensure soundness (see Appendix 7).

A1.337 The List of Changes to the Submission [LP002] proposed a change to identify the flood risk issues, but as this document is not being considered at the examination, this change is further proposed here.

CR14t: Aquis House, 41-59 Forbury Road

What is the background to the site allocation? How was it identified and which options were considered?

A1.338 The site comprises a relatively modern office building of five storeys. It was nominated for development in the call for sites exercise in 2023 by the landowner, Universities Superannuation Scheme Ltd together with the adjoining 33 Blagrove Street (CR14u) for a mixed office and residential development of 10-15 storeys.

A1.339 The options identified and which were subject to sustainability appraisal were as follows:

- Redevelop offices for mixed residential and office development of 10-15 storeys
- Do not allocate (remains as offices and car parking)
- Redevelopment for mixed use residential and office at below tall building threshold

What is the basis for the scale, type, and use proposed? Is it justified?

A1.340 The nomination was for a mixed office and residential allocation of 10-15 storeys. This would be likely to qualify as a tall building unless it was 10-11 residential storeys. The 2024 HELAA therefore assesses this site (ref AB082) on the basis of a 50/50 residential and office split. A footprint to site ratio of 43% was used. Given that the site directly adjoins a conservation area and also adjoins the listed Harris Arcade, a height of six storeys was assumed. This is the maximum height reached by the nearby new R+ development which also adjoins the same part of the conservation area. The resulting floorspace was split 50/50 offices and residential and the residential floorspace converted to dwellings using a figure of 90.4 sq m per dwelling. This resulted in a basic capacity of 50 dwellings. This was reduced to 49 by removal of the sub-station from the site area. Applying a 20% flexibility margin on either side would result in a range of 39-59 and no defined net gain of offices given the existing floorspace.

A1.341 It should be noted that, were the site to be a purely residential development the dwelling figure would likely increase, but it may well not double because of the site's location close to a number of late-night premises in Reading's main night-time economy area that could have significant impacts on residents. This is less of an issue with a mixed-use development where there is more flexibility in the residential location.

A1.342 Regarding the prospects of a much taller building, the site is part of the 'areas of less suitability for tall buildings' in policy CR10, so there would be a route to demonstrate that a tall building is appropriate. However the site directly adjoins the Market Place/London Street Conservation Area, also directly adjoining 37-43 Blagrove Street which is identified as a building of townscape merit in the conservation area appraisal, and the listed Harris Arcade, and is within the setting of other listed buildings. Therefore, demonstrating that a building of such height would be appropriate will require justification based on the criteria in the policy based on strong supporting evidence and is best handled through the development management

process. The LPPU can only be based on what we have reasonable confidence will be appropriate on the site.

What is the site's status in terms of permissions or completions?

A1.343 There are no planning permissions relating to development of the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.344 There are no particular infrastructure requirements and known unusual costs.

A1.345 The identified constraints relate to those in the policy criteria, notably noise from late-night premises, the setting of the conservation area and listed buildings, archaeological potential, noise from bus and rail movements, air quality and contamination. Some of these affect the layout and design of any development and are described above. Others would be capable of being addressed as part of any planning application.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.346 In the call for sites nomination in 2023 the landowners noted that the timescale for this site together with the adjoining CR14u becoming available was approximately 5-10 years. The site is therefore considered likely to become available and deliverable. The housing trajectory assumes development in the long term, after 2033.

Are there any main modifications required to the allocation for soundness?

A1.347 Yes. A proposed main modification was agreed in the Statement of Common Ground with Historic England [EX014] to ensure soundness (see Appendix 7).

CR14u: 33 Blagrove Street

What is the background to the site allocation? How was it identified and which options were considered?

A1.348 The site is an office building located within the Market Place/London Street conservation area. It was nominated for development in the call for sites exercise in 2023 by the landowner, Universities Superannuation Scheme Ltd together with the adjoining Aquis House (CR14t) for a mixed office and residential development of 10-15 storeys.

A1.349 The options identified and which were subject to sustainability appraisal were as follows:

- Redevelop offices for mixed residential and office development of 10-15 storeys
- Do not allocate (remains as offices)
- Redevelopment for mixed use residential and office at below tall building threshold
- Conversion to mixed commercial and residential use

What is the basis for the scale, type, and use proposed? Is it justified?

A1.350 As the site is already in office use, any change of use would be for residential. The site is heavily constrained by its location in the conservation area, and this informed the assessment of its capacity. The 2024 HELAA (site ref AB083) assumed that the site would be developed at five storeys on a footprint covering 64% of the site. The resulting floorspace was then converted to dwellings by using a ratio of 90.4 sq m for each dwelling, resulting in a site capacity of 25 dwellings. Applying a 20% flexibility margin on either side results in a range of 20-30 dwellings.

What is the site's status in terms of permissions or completions?

A1.351 There is not currently any planning permission on the site. There was a prior approval for conversion to 28 dwellings (18/1074) but this expired in 2021.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.352 There are no particular infrastructure requirements and unusual costs.

A1.353 The identified constraints relate to those in the policy criteria, notably the location in the conservation area, archaeology, noise from nearby night-time uses and air quality. These would need to be addressed at planning application stage, and as noted above the conservation area location has informed the capacity of the site.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.354 In the call for sites nomination in 2023 the landowners noted that the timescale for this site together with the adjoining CR14t becoming available was approximately 5-10 years. This also noted that significant areas of 33 Blagrove Street are already

vacant. The site is therefore considered likely to become available and deliverable. The housing trajectory assumes development in the long term, after 2033.

Are there any main modifications required to the allocation for soundness?

A1.355 Yes. A proposed main modification was agreed in the Statement of Common Ground with Historic England [EX014] to ensure soundness (see Appendix 7).

CR14v: 2 Norman Place

What is the background to the site allocation? How was it identified and which options were considered?

A1.356 The site comprises an office building adjacent to the River Thames. The site was nominated by the prospective developer through the call for sites exercise in spring 2023. It was nominated for a residential development of 240 homes.

A1.357 The options identified and which were subject to sustainability appraisal were as follows:

- Demolish and redevelop site for 240 homes
- Do not allocate, retain existing use (offices)
- Residential development at a more general town centre or edge of centre density (130-190 dwellings)
- Conversion to residential, estimated 70-80 dwellings

What is the basis for the scale, type, and use proposed? Is it justified?

A1.358 The site was nominated for and is suitable for residential use. In the 2024 version of the HELAA (site ref TH054) a town centre density of 327 dph was used to arrive at a basic capacity of 180 dwellings. After suitability analysis, the site size was reduced to allow a 10m buffer to Vastern Road to account for the identified treed corridor, a 10m buffer to the River Thames to allow for a biodiversity setting and to remove any remaining areas of Flood Zone 3, and this resulted in a reduction of the capacity to 160. Applying a 20% flexibility margin either side of this figure resulted in a range of 130-190 dwellings.

What is the site's status in terms of permissions or completions?

A1.359 There is a current outstanding planning application on the site (24/0958) which, at the time it was submitted would result in demolition and residential-led redevelopment for up to 11 storeys for 254 dwellings and a small amount of ground floor commercial. This was submitted in July 2024 and remains under consideration, with revised plans having been received in November 2025.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.360 The draft policy includes reference to contributing to enhanced bus priority on Vastern Road and an extension and bifurcation of the BUZZ18 bus route. These were measures that were identified in the Sustainable Connectivity and Vehicle Trip Distribution Analysis [EV017]. The level of contribution needed is not specified but this would be a matter for consideration at planning application stage.

A1.361 The identified constraints relate to those in the policy criteria, notably the biodiversity value of the Thames, the need for tree planting on the identified treed corridor, flood risk, air quality, contamination and potential impact on water and wastewater infrastructure. The capacity of the site has been reduced to account for some of these issues, whilst others would be capable of being addressed at planning

application stage through design or planning conditions. Consultation would be required with Thames Water and this may require some additional time to plan in any upgrades. The Level 2 SFRA [EV038i] for the site contains some recommendations around mitigating flood risk.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.362 The site is considered to be available, realistically viable and deliverable. The current planning application for the site illustrates the likelihood of a development coming forward, and the developer in their representation at Regulation 18 stage (see p267 of the Statement of Consultation [LP010]) have confirmed that the site does not have a future for office uses.

A1.363 No firm timescale has been proposed for the development. Given that the site is at planning application stage currently, a development in the medium term between 2029 and 2033 is considered realistic.

Are there any main modifications required to the allocation for soundness?

A1.364 No.

CR14w: Reading Bridge House, George Street

What is the background to the site allocation? How was it identified and which options were considered?

A1.365 The site consists of an 11-storey office building located in a prominent position next to one of Reading's two road crossings of the River Thames. The site was nominated by the landowner through the call for sites exercise in spring 2023. It was nominated for a residential development of 300-400 dwellings.

A1.366 The options identified and which were subject to sustainability appraisal were as follows:

- Residential development of 300-400 dwellings
- Do not allocate, continuation in office use
- Conversion of existing building to residential, estimated around 200 dwellings
- Residential development at general town centre densities (150-230 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

A1.367 The call for sites nomination emphasised that the site has a limited future in its existing office use. It was therefore considered through the 2024 HELAA for residential (site ref TH055). This assumed a conversion because it would result in a higher number of dwellings than a new-build at town centre densities. Using a figure of 64 sq m of existing floorspace equating to one dwelling, the capacity of the site is 192 dwellings. However, it should be noted that a new-build with the same basic footprint and scale of the existing building would be expected to deliver a similar level of development to the conversion. Applying 20% flexibility on either side and rounding to the nearest ten gives a range of 150-230 dwellings.

What is the site's status in terms of permissions or completions?

A1.368 There are no planning applications or permissions relating to this allocation.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.369 The draft policy includes reference to contributing to enhanced bus priority on Vastern Road and an extension and bifurcation of the BUZZ18 bus route. These were measures that were identified in the Sustainable Connectivity and Vehicle Trip Distribution Analysis [EV017]. The level of contribution needed is not specified but this would be a matter for consideration at planning application stage.

A1.370 The identified constraints relate to those in the policy criteria, notably impact on TPO trees, the biodiversity value of the Thames, archaeology, flood risk, air quality, noise, contamination and impact on water and wastewater infrastructure. The Level 2 SFRA for the site [EV038I] identifies that a residential development should be possible subject to a number of recommendations that would not affect the ability of the site to come forward. Other issues would be capable of being addressed at planning application stage through design or planning conditions. Consultation would be

required with Thames Water and this may require some additional time to plan in any upgrades.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.371 The building is still currently occupied. At the time of the call for sites submission (2023) the landowner identified that the building is coming to the end of its economic life and would require significant upgrade to continue in its current use. It further identified that the site would be expected to become available in 5-7 years with major lease expiries, and would take up to 10 years to bring forward. The anticipated delivery is therefore in the long-term (2033-2041) with the housing trajectory spreading delivery over that period. This is considered realistic.

Are there any main modifications required to the allocation for soundness?

A1.372 No.

CR14x: Part of Tesco Car Park, Napier Road

What is the background to the site allocation? How was it identified and which options were considered?

A1.373 The site consists of a portion of the large car park for the Tesco Extra store at the eastern end of Napier Road. It was nominated for development by the landowner, Tesco, for a residential development of 150-200 dwellings through the call for sites exercise in spring 2023, and was consulted upon as part of the Consultation on Scope and Content under Regulation 18. It had been put forward to previous versions of the Local Plan but was not allocated on the basis of flood risk.

A1.374 The options identified and which were subject to sustainability appraisal were as follows:

- Residential development of 150-200 dwellings
- Do not allocate
- Additional retail development
- Residential development at more typical urban densities, 57-85 dwellings.

What is the basis for the scale, type, and use proposed? Is it justified?

A1.375 Although within the defined town centre, the site is remote from the commercial core and is not likely to be suitable for more intensive commercial activity, meaning that residential use is a more likely option, in line with the nomination. However, this is an unusual site in that there are no adjoining residential sites to provide a guide to density and the adjoining Thames path here has a more tranquil, rural character. The 2024 HELAA (site ref TH032) therefore applied urban densities to this site of 112 dph. For context, the only residential site in close proximity to this is the Luscinia View development west of the Tesco Store, where the density is approximately 120 dph, and this development is highly prominent within its context and is closer to the town centre than CR14x. Using the urban density resulted in a basic capacity of 99 dwellings, but this was reduced substantially at suitability stage to account for the retention of trees protected by TPO and priority habitat leading to a site size reduction to 0.63 ha. The reduced dwelling number was 71, and application of 20% flexibility in either direction results in range of 57-82.

What is the site's status in terms of permissions or completions?

A1.376 There are no planning permissions affecting the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.377 The draft policy includes reference to contributing to an extension and bifurcation of the BUZZ18 bus route. This was a measure that was identified in the Sustainable Connectivity and Vehicle Trip Distribution Analysis [EV017]. The level of contribution needed is not specified but this would be a matter for consideration at planning application stage.

A1.378 In addition, it is also worth noting that this site is still subject to the Crossrail safeguarding direction from April 2009 which has not been revoked. The Elizabeth Line to Reading has now been up and running for some time, and there is not any known proposal to use the land in question, but consultation will nevertheless be required with Transport for London as described in paragraph 4.5.10 of the LPPU.

A1.379 The identified constraints relate to those in the policy criteria, notably protected trees, priority habitats within and adjacent to the site and an adjoining Local Wildlife Site, flood risk, air quality, noise and light pollution, contamination and impact on water and wastewater infrastructure. The Thames Valley is also a major landscape feature. As set out above, some of these have been taken into account in assessing the capacity of the site, and others would need to be considered at planning application stage. In terms of flood risk, the relevant Level 2 SFRA for the site [EV038g] concludes that a residential development for the site should be possible but that a significant amount of infrastructure may need to be raised so that is safe for the lifetime of the development.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.380 Through the HELAA process the landowner confirmed that the site is already available for development, being an underused part of the car park, and no particular issues with its delivery were noted, which was suggested for 2028. As there is no permission it is not considered appropriate to assume delivery within the five year supply period, and so delivery in the medium term is more likely. The LPPU as submitted currently lists it in the long term and it is suggested that a main modification be made, which is also reflected in the amended housing trajectory.

Are there any main modifications required to the allocation for soundness?

A1.381 Yes. It is suggested that delivery in figure 10.1 should be shown in the medium rather than long term.

CR14y: Kennet Place, Kings Road

What is the background to the site allocation? How was it identified and which options were considered?

A1.382 The site consists of an office building, part of a wider complex of three interconnected office buildings collectively known as 121 Kings Road. This is the westernmost of the three buildings. The site was nominated by the landowner through the call for sites exercise in spring 2023. It was nominated for conversion to approximately 70 dwellings.

A1.383 The options identified which were subject to sustainability appraisal were as follows:

- Conversion to residential use
- Do not allocate
- Redevelopment of the site for residential use

What is the basis for the scale, type, and use proposed? Is it justified?

A1.384 The site was assessed in the 2024 version of the HELAA for its potential for conversion. It was assessed that, using a figure of 64 sq m of existing floorspace equating to one dwelling, the capacity of the site is 105 dwellings. It should be noted that a redevelopment at town centre density would result in a similar capacity. Applying a 20% flexibility either side of this figure gives a range of 84-126.

What is the site's status in terms of permissions or completions?

A1.385 Prior approval for a change of use of the office to 93 dwellings was granted in September 2024 (24/0997). The change of use appears to be underway and the dwellings are being advertised.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.386 There are no particular infrastructure requirements and unusual costs.

A1.387 The identified constraints relate to those in the policy criteria, notably air quality, noise, contamination and impact on water infrastructure. Those matters that were able to be considered were taken into account in assessing the application for prior approval and have been dealt with.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.388 The current office building is being converted in line with the prior approval. This appears from the outside to already be underway. This is considered to be realistically viable and deliverable and is expected to occur within the next few years.

Are there any main modifications required to the allocation for soundness?

A1.389 No.

CR14z: Sapphire Plaza, Watlington Street

What is the background to the site allocation? How was it identified and which options were considered?

A1.390 The site consists of an office building. It was nominated as part of the call for sites exercise in spring 2023 together with the adjacent Royal Court, a block of 35 apartments, for a residential development of 250-400⁸ dwellings and around 3,000 sq m of commercial space.

A1.391 The options identified and which were subject to sustainability appraisal were as follows, and they relate to both Sapphire Plaza and Royal Court unless specified:

- Residential development of 250-400 dwellings (215-365 net gain) and c.3,000 sq. m of commercial space
- Do not allocate
- Residential development at general town centre densities of 80-135 dwellings (45-100 net gain)
- Redevelopment of Sapphire Plaza for residential (approx. 50-85 dwellings)
- Conversion of Sapphire Plaza to residential (approximately 70 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

A1.392 The site is not well located for significant commercial development, being outside the commercial core of the station and away from the immediate station area. Royal Court is already a residential location and the site was therefore considered for a residential use. For both Sapphire Plaza (AB084) and Royal Court (AB085) the starting point was to apply residential town centre density of 327 dph resulting in site capacities of 82 and 52 (17 net gain) respectively. At suitability analysis stage, the capacity was reduced to 62 dwellings for Sapphire Plaza to allow for a 10m buffer to canal for planting to reflect treed corridor and in line with policy EN11 and to keep a part of the southwestern corner of the site clear of development to allow at least 18m between buildings. Royal Court was not considered suitable at this stage as making similar necessary adjustments to capacity resulted in a net gain of 8 dwellings which would not justify the loss of existing properties. The total capacity for the site of 62 dwellings was therefore expressed as a range of 50-74 after applying a 20% flexibility margin on either side.

A1.393 The representations from Mapledurham Properties regarding the site suggest that the HELAA should have assessed the two sites together as well as separately. However, as the starting point for capacity was application of pattern book densities at town centre density it is unlikely it would have come to very different conclusions. An assessment of the whole site would have come up with the same figure as the sum of the two sites as a starting point, and likely made the same adjustments. The adjustment made to ensure separation of residential properties was not due to Royal Court but rather the nearby Q2 development so combination of the sites would not have resolved the issue.

⁸ Representations from Mapledurham Properties at Regulation 19 stage now estimate 320-450 homes.

What is the site's status in terms of permissions or completions?

A1.394 There are no planning permissions relating to the site. Previously prior approval (19/2059) was granted for conversion of Sapphire Plaza to 85 dwellings but this expired in February 2023.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.395 There are no particular infrastructure requirements and unusual costs that would not apply to most other town centre brownfield sites. Inclusion of Royal Court would raise an issue of the accommodation for the existing residents, but the Regulation 19 response from Mapledurham Properties suggests this could be managed by phasing a development so that properties on the Sapphire Plaza site were available for residents to move into before Royal Court was redeveloped.

A1.396 The identified constraints relate to those in the policy criteria, notably the separation from existing residential, the need for tree planting as part of the treed corridor along the canal, air quality, noise, contamination and impacts on water and wastewater infrastructure. If development were closer to the river bank flood risk would also come into play. These are either built into the capacity estimates or would need to be dealt with at application stage. In the case of water infrastructure, Thames Water may need some time to ensure the appropriate upgrades are provided.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.397 The site is expected to become available and is considered to be deliverable in the plan period. The representation from Mapledurham Properties suggested that a pre-application submission would be made early in 2025. In terms of viability, this would need to be considered in detail at application stage, but there is considered a realistic prospect that development would be viable in the plan period. On this basis delivery in the medium term is assumed.

Are there any main modifications required to the allocation for soundness?

A1.398 No.

CR14aa: Part of Reading College, Kings Road

What is the background to the site allocation? How was it identified and which options were considered?

A1.399 The site consists a part of the Reading College consisting mainly of car parking. Reading College is a vocational, further and higher education institution. The site was nominated by the landowner during the call for sites exercise in spring 2023 for mixed use or residential development with around 45 dwellings on a site that also included the Reading Rep Theatre site.

A1.400 The options identified and which were subject to sustainability appraisal were as follows:

- Mixed use or residential (c. 45 dwellings)
- Do not allocate
- Residential development of site excluding the part occupied by the theatre
- Development for continued education use

What is the basis for the scale, type, and use proposed? Is it justified?

A1.401 The site is on the very edge of the town centre in a location where commercial uses have largely now been converted to residential. The site was therefore primarily considered for residential use. In the 2024 HELAA this site (ref TH057) was assessed on the basis of a residential urban density of 112 dph as although within the defined centre it is surrounded by land outside the centre and is therefore in a primarily urban context. This resulted in a basic capacity of 59 dwellings. However at suitability stage the inclusion of the south eastern corner of the site which has recently been converted to the Reading Rep Theatre was identified, and consultation with colleagues in our Culture section highlighted the importance of its retention as follows:

“As well as their own performance that they write, produce and stage, they have a large outreach programme working with people with SEND, minority ethnic groups and they work with other smaller arts organisations to provide them with the opportunities to stage their work in the venue.”

Therefore, the site was reduced at this stage to exclude the theatre and this is reflected in the proposed allocation boundary. Adjustments were also made to exclude areas covered by TPO and areas closest to the rear of Kingsgate Street properties, which also allowed for a 10m buffer to Kings Road as a treed corridor and some remaining parking provision for theatre. This resulted in a figure of 39 dwellings, converted to a range of 31-47 with 20% for flexibility on each side, a range which would allow for the initial nomination figure.

What is the site's status in terms of permissions or completions?

A1.402 There are no planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.403 There are no particular infrastructure requirements and unusual costs. There is no expectation that any additional parking would be required to offset the loss of parking for the College and it should be noted that the site is on one of Reading's most frequently served bus corridors.

A1.404 The identified constraints relate to those in the policy criteria, notably the presence of Reading Rep Theatre, protected trees and the identification of Kings Road as a treed corridor, the need for back to back separation from existing properties, air quality and noise. A number of these have been factored into the site capacity calculations and the remainder would be capable of being addressed at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.405 Through the HELAA process, the owners set an expectation that the site would become available in around 2029-30 and did not identify any particular barriers to development. It is therefore considered realistic that the site will be available, viable and deliverable. Delivery in the long term is assumed due to the time required between a site becoming available and delivery on the ground.

Are there any main modifications required to the allocation for soundness?

A1.406 Yes. At Regulation 19 stage the Environment Agency noted issues with this site as follows: *"Desk study at a minimum required here owing to location and because of the aquifer designation. Shallow depths to groundwater are a possibility which will need to be carefully considered."* A main modification is proposed to address this issue.

CR14ab: 160-163 Friar Street

What is the background to the site allocation? How was it identified and which options were considered?

A1.407 The site comprises retail units on the ground floor and upper floors currently used as Reading County Court. The site was identified through the HELAA process as there was an expired permission for change of use of upper floors to residential. The HELAA considered this a suitable development and it was brought into the LPPU.

A1.408 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Conversion of upper floors to residential and retention of ground floor commercial use
- Do not allocate, retain existing use (offices)
- Redevelopment to residential use in full.

What is the basis for the scale, type, and use proposed? Is it justified?

A1.409 The site is on an important town centre frontage and retention of ground floor commercial units is vital. As the broad use is already offices, an allocation would not be necessary for that change. A conversion to residential in line with the expired permission was therefore assessed. The 2024 HELAA (site ref AB076) assumes conversion using a figure of 64 sq m per dwelling and arrives at a capacity of 35 dwellings. A margin of 20% in either direction is applied for flexibility and this results in a range of 28-42.

What is the site's status in terms of permissions or completions?

A1.410 There are no permissions covering the site. A previous prior approval (16/0212) was granted for conversion to 28 flats but this expired in 2019.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A1.411 There are no particular infrastructure requirements and unusual costs.

A1.412 The only identified constraints relate to those in the policy criteria, notably noise and air quality, as a conversion would have limited impacts on, for example, nearby heritage assets. These could be mitigated at application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A1.413 The site is still currently occupied. However planning permission (23/1190) was secured for the Civil and Family Court to be relocated to 20-30 Kings Road and fitout was underway at the most recent visit. This would enable 160-163 to become available. The proposed development is for conversion only, which is considered likely to be viable and deliverable in the plan period, with medium term being most likely.

Are there any main modifications required to the allocation for soundness?

A1.414 Yes. A proposed main modification was agreed in the Statement of Common Ground with Historic England [EX014] to ensure soundness (see Appendix 7).

Appendix 2: South Reading site information for questions 10.24 to 10.29

SR1a: Former Landfill, Island Road

What is the background to the site allocation? How was it identified and which options were considered?

- A2.1 This is the site of the former landfill of the Smallmead Civic Amenity Site, and this included not only filling the ground but also some landraising which has been capped. The site was nominated for inclusion for employment uses in the now-adopted Local Plan through the call for sites process and was then included, along with some additional adjacent land owned by the Council, as a major allocation which it is proposed to retain. At call for sites stage for the LPPU in spring 2023 a submission was made by the main landowner to retain the allocation.
- A2.2 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Employment development (B1/B2/B8)
 - Leisure development
 - Residential development (60-100 dwellings)
 - Offices

What is the basis for the scale, type, and use proposed? Is it justified?

- A2.3 The site is subject to a number of constraints which make use of the land for, for example, residential inappropriate, not least the location directly on the landfill which would be extremely difficult to overcome for a residential use, in addition to residential development adjoining the recycling centre and sewage treatment works being unlikely to be suitable. The A33 corridor is the main location in the strategy for major industrial and warehouse development. This is also the only opportunity for a site on this scale to meet employment needs within our boundaries, and without it there is no prospect that employment needs could be met within Reading. This was therefore assessed for industrial and warehouse needs.
- A2.4 In the 2017 version of the HELAA, an industrial/warehouse density of 3,280 sq m per hectare was applied, resulting in a capacity on the site of 105,386 sq m. Applying a 10% flexibility margin and rounding to the nearest 1,000 sq m on either side resulted in a range of 95,000-116,000 sq m. In the 2024 HELAA, the same broad approach was used for this site (WH001) but the density for industrial/warehouse uses had increased to 3.450 sq m per hectare based on more recent permissions and this led to an increased capacity of 110,849 sq m. There are sensitivities close to the site, including the need for a buffer to new residential at Green Park Village and the need to address visual impact on the major landscape feature, but on a site of this scale there are many options for layout that can address these matters without needing to reduce the overall capacity. There was not considered to be justification for using a 10% flexibility margin for industrial uses, as had been the case in the adopted Local Plan, so a 20% margin was used in line with other sites to arrive at a range of 90,000-133,000 sq m.

What is the site's status in terms of permissions or completions?

- A2.5 There are no planning permissions relating to the site. A request for an EIA Screening Opinion was made in 2020 (20/1238) and a new request was made in 2025 (25/1521).

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A2.6 There would be a number of infrastructure implications for a development of this scale which are reflected where appropriate in the overall policy criteria of SR1. A full transport assessment would be required which would identify the need for any upgrades to Island Road, the A33 junction or elsewhere, and these would be expected to be mitigated as part of any planning permission, and most likely incorporated into the Section 106 agreement.
- A2.7 The bus rapid transit proposals could also involve identifying opportunities to cross the site and access Green Park Station from the A33. Firm routes have not been identified to deliver this, and there are existing links to the station via Green Park Village, but the Council would expect opportunities to deliver these links to be investigated as part of any layout. The need for enhancements to public transport and active travel links would also be expected to be highlighted in the transport assessment and delivered as part of the development.
- A2.8 A development on this scale would also potentially have implications for water and wastewater infrastructure and electricity infrastructure. These would be for the developer to resolve with Thames Water or SSE but if not highlighted early could lead to delays in the timescale of development whilst upgrades are put in place.
- A2.9 The development taking place on a former landfill site will present cost challenges in terms of ensuring that the development is safe and does not raise issues of release of gases or other materials and land instability. This has been known from the outset, and it is considered to be capable of being overcome in the development.
- A2.10 In terms of constraints, the 2020 extension of the Detailed Emergency Planning Zone for AWE Burghfield to cover this site represents a new constraint that was not present when the site was allocated. In general employment development in the DEPZ can present less of a challenge than residential due to the fact that it is not a permanent population and that there is greater potential for employees to be managed through a single management plan for a building or buildings, but it nonetheless forms an important constraint. The key expectation will be that there be an emergency plan in place for the site or for individual buildings that relies on sheltering in place for a 48 hour period. This will require space to be available inside the buildings that can be sealed and would be adequate for the workforce to shelter for this length of time. This could include ancillary offices and break rooms that would likely be provided in any case. The advice has been that the required level of air-tightness would be equivalent to a house with its doors and windows closed, so it should not represent an unreasonable burden to achieve this level but a warehouse shell would not likely be sufficient on its own.

A2.11 The other identified constraints include the site's location adjacent to a major landscape feature, a priority habitat containing eutrophic standing water beneath the household waste recycling centre and a brook along the eastern boundary with biodiversity value. There would need to be careful location and screening of the development from the major landscape feature. Noise from the development may also affect existing residential properties and this would need to be assessed and mitigated at application stage. The site has been identified as being partly at risk of flooding, but the Level 2 SFRA for the site [EV038o] identifies that the majority of the development can be located outside Flood Zones 2 and 3. The areas of flood zone 3 are limited to the very fringes of the site which are likely to form landscaped buffers in any case,

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A2.12 The site is considered to be available and to be viable and deliverable in the plan period. The owner of the majority of the site, SEGRO, is progressing proposals for the vast majority of the site and has made representations to confirm support for the continued allocation. A planning application for the majority of the site is anticipated in 2026. The Council-owned site south of the recycling centre can only be accessed through the remainder of the site, so would need to await detailed proposals for the main part of the site before progressing, but this issue has been raised in the text of the sub-area policy which refers to the need for a comprehensive solution. There are no uses on the site that would require relocation, but there will be a considerable amount of technical work required on assessing and preparing the land for development, so whilst this may get underway in the medium term this is considered to be a site where delivery would continue into the long term.

Are there any main modifications required to the allocation for soundness?

A2.13 No.

SR1c: Island Road A33 Frontage

What is the background to the site allocation? How was it identified and which options were considered?

- A2.14 This is the site of the former greyhound and speedway stadium which was demolished some years ago. The site is now entirely cleared. It has been used for events parking including for the football stadium on a temporary basis. It was identified as an opportunity for development at Local Plan stage through internal processes as the Council owns the freehold, although it has also been subject to past permissions.
- A2.15 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Mixed commercial uses, excluding residential
 - Retail development
 - Leisure development
 - Residential development (270-506 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

- A2.16 The site represents a significant development opportunity that could make a major contribution to meeting identified needs. The most significant needs are for housing and employment. However, this is not considered to be an appropriate site for residential given its location adjacent to the sewage treatment works, major employment developments and allocations and its separation from existing residential. There is an outstanding permission for offices (see below) but this is not a location that is likely to be favoured by the market for new office development as it would not be a business park type development or a town centre provision, and this is likely to be even more the case in a post Covid situation where the need for offices is contracting. It has therefore been progressed as an allocation for industrial and warehouse uses.
- A2.17 In the 2017 version of the HELAA, the site was subject to an industrial/warehouse density of 3,280 sq m per hectare, resulting in a capacity of 31,816 sq m. This was adjusted slightly to allow for an 8m strip along the eastern boundary of the site for what was then mass rapid transit provision, resulting in a reduced capacity of 29,527 sq m. When a 10% flexibility on either side was applied with appropriate rounding this resulted in a range of 27,000-32,000 sq m. In the 2024 HELAA, the same broad approach was used for this site (WH002) but the density for industrial/warehouse uses had increased to 3.450 sq m per hectare based on more recent permissions and this led to an increased capacity of 33,465 sq m. This was again adjusted downwards to 31,533 sq m to allow a 15m buffer for both a bus lane and for planting on the treed corridor of the A33. There was not considered to be justification for using a 10% flexibility margin for industrial uses, as had been the case in the adopted Local Plan, so a 20% margin was used in line with other sites to arrive at a range of 25,000-38,000 sq m.

What is the site's status in terms of permissions or completions?

- A2.18 The site has an outstanding outline planning permission for 73,102 sq m of offices. Planning permission 05/0823 was granted in September 2007 for development for up to 1,150 homes, offices, hotel, retail & community uses, open space & infrastructure including a bridge link across the A33. Most of this development was to occur on the east side of the A33 and has now been completed as the Kennet Island development. Only the offices were to be on the western side on the SR1c site. However, as the permission was implemented the permitted offices on this site remain outstanding but there is little prospect that they will be built out.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A2.19 An employment development on this scale will have infrastructure requirements in terms of matters such as transport, based on a transport assessment at planning application stage. However, in this case there were former uses on the site which generated trips and there is the baseline position of the office consent which will be a factor. Specific mitigation measures required will be identified at that stage. More strategically, it has been assumed that land may be needed to allow for the provision of a northbound bus lane as part of South Reading bus rapid transit, and this has been reflected in the capacity of the site.
- A2.20 As for the SR1a site, there may be water, wastewater and electricity upgrades needed and this will need to be based on liaison with Thames Water and SSE at an early stage to avoid these upgrades delaying development. This is reflected in the criteria within the main SR1 policy.
- A2.21 The extension of the Detailed Emergency Planning Zone for AWE Burghfield took place in 2020 to cover this site and therefore represents a new constraint to development. The Council considers that this should be addressed in the same manner as described in relation to SR1a. However, as described above this site has a baseline position of a planning permission for 73,102 sq m of offices. Based on 2010 employment ratios⁹, this could mean more than 6,000 employees on site. This is very substantially more than would be expected with the assessed capacity for industrial and warehouse space which would be less than 1,000 for B2 development, which represents the highest employment density within the industrial and warehouse classification. In addition, as an existing permission, this site should have been accounted for within the Off-Site Emergency Plan.
- A2.22 Other identified constraints include potential contamination and air quality which can be dealt with at planning application stage. There is some surface water flood risk on the site but this is mostly accommodated within the site itself and is considered to be capable of being addressed as part of any development.

⁹ [Employment Densities Guide](#)

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A2.23 The site is Council-owned with an option to a developer who is known to be supportive of the allocation. The intention is to bring the site forward in line with the policy, but this has not yet progressed. There are no existing uses on site that require relocation, so this is considered to be a realistic prospect in the medium and long term.

Are there any main modifications required to the allocation for soundness?

A2.24 No.

SR2: Land North of Manor Farm Road

What is the background to the site allocation? How was it identified and which options were considered?

A2.25 The site as originally in the Local Plan consists of a mix of employment and leisure premises consisting of two large warehouses, two office developments, a small business park, a tyre workshop, bingo hall and a former office site recently redeveloped for retail, public house and gym. It was initially identified through evidence work to support the Sites and Detailed Policies Document (adopted 2012), which consisted of an Employment Land Review that identified that the area had limited future for employment uses given restricted access to the strategic road network and not being within established office locations. The reallocation of the land was also identified as having the benefit of being able to link the new Kennet Island residential development to the rest of south Reading so that residents could better access services and facilities and to prevent isolation of communities. The area was therefore included in the Sites and Detailed Policies Document and carried across to the Local Plan.

A2.26 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- No policy, do not allocate
- Continue current policy SA2c (SDPD) allocation for housing
- Designate as core employment area
- New policy allocating for increased residential density and education provision

What is the basis for the scale, type, and use proposed? Is it justified?

A2.27 The purpose of the allocation was always to provide a residential link between Kennet Island and South Reading, and to make better use of land with limited future for employment uses, so a residential development was appropriate. In the 2017 version of the HELAA, adjustments to the site area to remove 350 Basingstoke Road which had already been developed along with the small business units of the Micro Centre that would need to be replaced and the highway of Gillette Way itself were made, along with removal of approximately 1 hectare for a primary school. Development of the remainder at an urban density of 81 dph results in 855 dwellings and an estimated primary school of 2,500 sq m (based on a then recent new primary school that had been developed at Hodsoll Road). The dwelling range was 680 to 1,020 based on applying 20% flexibility on either side and rounding to the nearest ten.

A2.28 In the 2024 HELAA a more granular assessment was carried out of each site making up the existing allocation (refs WH003-10). For each of these sites an increased urban density of 112 dph was applied, resulting in an initial capacity across the site of 1,466 dwellings. At suitability stage, some adjustments were made however. This included leaving a 25m buffer along the north side of Manor Farm Road on sites WH005 and WH010 to provide a break from the noisy industrial uses to the south. It also included removing the Micro Centre (WH006). 350 Basingstoke Road (WH007) and the ATS premises (WH008) from the allocation entirely. 350 Basingstoke Road

had already been developed for district centre uses in line with the policy and was not considered to have any further capacity for development. The 350 Basingstoke Road site includes two access 'arms' both north and south of the Micro Centre site, which restricts the ability of that site to be developed, and in any case the retention or replacement of the small units on this site was part of the SR2 policy from the outset, so it would make sense to simply retain them in place as it would have no effect on the wider potential. Leaving these two sites out of the allocation also separates the ATS site from the wider allocation, and the site has limited potential to come forward for a satisfactory residential development on its own, being relatively small and surrounded on all sides by retail uses and associated parking and servicing that would not be likely to change in the foreseeable future. This is the reason for the proposed change to the allocation boundary and site area in the LPPU. These amendments at suitability stage led to a revised capacity of 1,245 dwellings. When 20% flexibility is applied in either direction and rounded to the nearest ten, this results in a range of 1,000 – 1,490 dwellings.

- A2.29 It is worth noting that the 2024 HELAA, unlike the 2017 version, did not make any allowance for provision of a primary school. At this point, work inputting into the Infrastructure Delivery Plan did not identify the anticipated growth as part of the LPPU as requiring additional primary or secondary school places, and the requirement for school provision was therefore proposed to be amended to indicate that it would be an acceptable but not essential part of the mix.

What is the site's status in terms of permissions or completions?

- A2.30 Development of a foodstore, public house and gym on the 350 Basingstoke Road site which was formerly offices took place under planning permission 14/0739 in 2015-16, which formed a significant extension to the Whitley District Centre as set out in the policy. There are no other planning permissions on the site relevant to the allocation.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A2.31 In terms of infrastructure, the existing policy identifies a need for school provision. However, infrastructure planning work in support of the LPPU has identified that the LPPU growth does not result in the need for additional primary or secondary places, and it is not therefore justified for this to be a policy requirement, and the proposed change to the policy expresses this as a potentially acceptable part of the mix. For healthcare, there are existing issues in the distances that some parts of south Reading would need to travel to primary healthcare, but this has not been identified in the Integrated Care Board responses as a priority location. This would also therefore be identified as a potentially acceptable part of the mix. There are no particular infrastructure requirements and unusual costs.
- A2.32 The scale of the development would also offer potential to deliver decentralised energy in line with policy CC3, and this is highlighted in the policy.
- A2.33 A development of this scale has potential for impacts on water and wastewater and electricity infrastructure and this will need to be based on liaison with Thames Water

and SSE at an early stage to avoid these upgrades delaying development. This is reflected in the criteria within the policy.

- A2.34 Enhanced permeability through the site would be essential to meet the aspiration of better linking Kennet Island and the rest of South Reading, and potential alignments for key routes are shown on figure 6.3 of the LPPU. This can be designed in from the outset and should not have any impact on the developability of the sites.
- A2.35 The development of 350 Basingstoke Road has fulfilled most of the requirement for district centre expansion but there does remain some potential on the Bingo Hall site to the south, particularly if the leisure use of that site is to be lost.
- A2.36 In terms of constraints, the comprehensiveness of development is a particular concern in this location. Development of some sites for residential in isolation would likely cause issues with their relationship with retained employment sites if not carefully considered. Some of the sites this applied to in particular are now proposed to be removed from the allocation, but it would also be the case that Beacontree Plaza (WH004) for example would be difficult to develop in isolation for residential with large warehouses closely located on either side. The policy criteria therefore give additional guidance on this matter.
- A2.37 The other identified constraints relate to those in the policy criteria, notably the need to enhance the Basingstoke Road frontage, provision of an appropriate buffer along Manor Farm Road to separate the site from noisy industrial uses, surface water flood risk, potential contamination and archaeological potential. These are taken into account in the development capacity of the site or would be capable of being addressed at application stage. Any surface water flood risk is largely contained within the site and is related to the large amount of hardstanding and could be addressed as part of any development.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A2.38 This has always been identified as an area to be delivered in the long term, and this remains the case. None of the remaining sites are currently available for development and all have at least some level of occupation. Specific comments on most of the sites are set out below:
- The DHL site on Gillette Way (WH003) is freehold owned by the Council but is on a long lease. It is considered realistic that the site is brought forward for development in the plan period in the long term only.
 - Beacontree Plaza (WH004) is also freehold owned by the Council. It is an office park with consistent high levels of availability over the last 10-15 years and has limited future for offices as it is not in an established town centre or business park location. This is also considered to represent a realistic opportunity for development.
 - BJs Bingo Hall (WH009) is considered to offer potential to become available over the plan period. The facility was already considered too large with declining demand for bingo due to online competition, which led to the subdivision of the premises for an industrial use that was never let and then subsequently for a

trampoline park that is now closed and replaced by a gymnastics facility. There are large areas of car parking on site that are rarely fully used and also offer potential for development.

- The owners of Manor Park (WH010) responded to enquiries about availability during the HELAA process and confirmed that there is potential for the site to become available in the period 2029-2034. This is an office park in a non-town centre or business park location and is considered to have limited future for office uses.

A2.39 Therefore, it is considered that there is a realistic prospect of the area being developed in the long term (after 2033).

Are there any main modifications required to the allocation for soundness?

A2.40 No.

SR3: South of Elgar Road

What is the background to the site allocation? How was it identified and which options were considered?

- A2.41 The site consists of a Makro wholesale premises on the largest part of the site including car parking which appears generally underused together with some adjacent employment uses on either side on land along the south side of Elgar Road.
- A2.42 The employment premises in the area were identified as having limited future requirements for employment related uses in an Employment Area Analysis (an earlier version of EV010) which led to consideration of the future of the larger Makro site by officers during Local Plan preparation process. Discussions were held with the owners, Booker plc, which revealed potential to move off the site if other premises would be available, but also wanted the option to retain a commercial presence on the site. Following the 2017 HELAA, the area was included in a draft version of the Local Plan.
- A2.43 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- No policy, do not allocate
 - Designated as a core employment area
 - New policy encouraging residential development

What is the basis for the scale, type, and use proposed? Is it justified?

- A2.44 Given that an analysis of the existing uses had revealed that they had limited future as employment or retail sites, this was considered for a reallocation to residential. In the 2017 HELAA, the four constituent elements of the site were assessed using an urban density of 81 dph, which resulted in a total initial capacity for the site of 435 dwellings. However, this was reduced by 45 dwellings at suitability stage to allow a buffer of around 20m to the retained employment uses to the south and south east, resulting in an adjusted capacity of 390 dwellings.
- A2.45 In the 2024 HELAA, the sites (refs KA005-KA008) were considered using the increased urban density of 112 dph. This resulted in an initial capacity across the site of 603 dwellings. Again, at suitability stage, adjustments were made. These included leaving a 20m buffer to the retained industrial sites to the south and south east, allowing a 10m wide green link through site KA006, and, due to the location adjacent to a major landscape feature, development of one third of KA005 and KA006 and one quarter of KA007 at suburban density of 43 dph and the remainder at the urban density. The amended capacity for the area is 452 dwellings. Applying 20% flexibility margins in either direction and rounding to the nearest ten gives a range of 360-540.

What is the site's status in terms of permissions or completions?

- A2.46 There are no planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A2.47 In terms of infrastructure requirements, the main issues identified are in terms of water and wastewater and electricity infrastructure and this will need to be based on liaison with Thames Water and SSE at an early stage to avoid these upgrades delaying development. This is reflected in the criteria within the policy. The need for a pedestrian access between Elgar Road and Waterloo Meadows was also identified, which could be provided within the identified green link.
- A2.48 The identified constraints relate to those in the policy criteria, notably the need for a buffer between the residential and employment uses, a landscaped ecological boundary to Waterloo Meadows, retention of significant trees where possible, potential archaeology, potential contamination, the need to make use of existing accesses and some level of surface water flood risk. Some of these affect the development potential of the site and have been taken into account in calculating the site's capacity, whilst others will need to be addressed at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A2.49 The only recent information on availability relates to the 272-274 Elgar Road site (KA006) through the HELAA process where the landowner identified that the site would potentially become available by 2029. Although the owners of the Makro site (KA007) had previously supported its inclusion through discussions and submissions to the Local Plan, during LPPU preparation there has been no revised information on their intentions. No information on the other two sites has ever been forthcoming. However, given that that Makro site appears to be underused with a very large area of car parking, and that the employment allocations in the plan may offer preferable premises to relocate to (in relation to the initial discussions on this site) there is still considered a realistic prospect of this site coming forward in the plan period, alongside the industrial and warehouse sites to the north west. The Keyline Builders Merchants site (KA008) has a very long term occupier, and no past record of interest in development, and is also not essential for the rest of the allocation to come forward. For that reason, it is considered less likely to be delivered, and the housing provision figures in H1, housing trajectory and HELAA assume no development on this part of the allocation in the plan period. The remainder would be delivered in the long term (after 2033) only.

Are there any main modifications required to the allocation for soundness?

- A2.50 No.

SR4a: Pulleyn Park, Rose Kiln Lane

What is the background to the site allocation? How was it identified and which options were considered?

- A2.51 The site consists of a builders merchants and two vehicle dealership buildings. The site was first identified through the process of examining existing employment areas as part of preparing the Local Plan. An Employment Area Analysis was carried out on the same basis as the updated version submitted in support of the LPPU [EV010] and this identified that this did not require retention in employment use. This led to its consideration as part of the 2017 HELAA for alternative uses and it being identified as potentially suitable for residential use, and its subsequent inclusion in the Local Plan.
- A2.52 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Allocate for residential
 - Retail
 - Offices
 - Leisure use

What is the basis for the scale, type, and use proposed? Is it justified?

- A2.53 As set out above, the site was identified as not being required for protection as employment use and is therefore potentially able to meet the high level of need for residential. The site immediately to the north has recently been developed for residential on a former self-storage facility and this allocation would reflect and continue that change.
- A2.54 In the 2017 version of the HELAA the site was assessed with an urban density of 81 dph which meant a basic capacity of 104 dwellings. However, at the suitability analysis stage this was reduced to exclude areas within Flood Zone 3 and to incorporate a setback from important trees and from waterside areas, which resulted in a reduced capacity of 86 dwellings. Applying 20% flexibility margins in either direction led to a range of 70-100 dwellings.
- A2.55 For the 2024 HELAA the site was broken into two constituent parts – the builders merchants (ref KA009) and the vehicle dealerships (KA010). An increased urban density of 112 dph was applied to both sites. In the case of the builders merchants this resulted in a basic capacity of 43 dwellings, but significant adjustments were made at suitability stage, including a 20m buffer to the A33 to account for noise impacts, a 10m buffer to the river and brook running through site to allow for biodiversity setting and treed corridor, which also removes areas at risk of flooding and priority habitats from the development area. These adjustments brought the capacity down to 25 dwellings. On the vehicle dealerships site the urban density results in an initial capacity of 102 dwellings but again at suitability stage there were adjustments made to allow a 20m buffer to the neighbouring dealerships to the south to reduce noise and disturbance and a 10m buffer to the river to allow for a

biodiversity setting and treed corridor, resulting in a capacity of 75 dwellings. The total across the site was therefore 100. Applying 20% flexibility on either side results in a range of 80-120 dwellings.

What is the site's status in terms of permissions or completions?

A2.56 There are no relevant planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A2.57 There are no particular infrastructure requirements and unusual costs.

A2.58 Many of the constraints identified in the policy criteria have been taken into account in the adjustments to the site capacity such as a buffer to the River Kennet, improvements of the green link along the brook through the site which would include ecological enhancement, a buffer to the dealerships to the south and ensuring no development within Flood Zone 3. A Level 2 SFRA for the site has been carried out [EV038b] which identifies that a residential development should be possible. Other identified constraints include avoiding overlooking of rear gardens on Elgar Road (which should be achieved in part with the buffer to the Kennet), noise and light impacts, air quality, potential contamination, archaeological potential and impact upon water infrastructure. These should all be capable of being addressed at planning application stage, although the water infrastructure issue would need liaison with Thames Water to plan in the upgrades which may have a lead-in time.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A2.59 The site is occupied but the landowner of the car dealerships on the site responded to contact through the HELAA process in 2024 to confirm that the site has potential to become available in the plan period, but this would require alternative sites to be found and would likely not be until after 2030. There has been some past interest expressed in development of the builders merchants site, albeit not particularly recently. However, it is considered that there is a reasonable prospect of the sites becoming available during the plan period and this has therefore been identified as a potentially developable site in the long term.

Are there any main modifications required to the allocation for soundness?

A2.60 No.

SR4b: Rear of 3-29 Newcastle Road

What is the background to the site allocation? How was it identified and which options were considered?

A2.61 The site consists of rear gardens and associated land and a residential property that would need to be demolished to secure access. The site was identified through the 2017 HELAA process as there was an expired permission for demolition of 11 & 13 Newcastle Road and 13 terraced houses to the rear of 3-17 Newcastle Road. However the opportunity extends beyond to the rear of 19-29 Newcastle Road. This led to its inclusion in the Local Plan.

A2.62 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential development (18-27 dwellings)
- Higher density residential development (more than 40 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

A2.63 This is rear garden land in a residential area and is therefore only likely appropriate for residential development. In the 2017 version of the HELAA an urban density was initially applied but when tested at suitability stage a suburban density was identified as being more appropriate which resulted in a capacity of 22 dwellings. With 20% flexibility margins above and below the identified range was 18-27. In the 2024 HELAA (site ref RE001) a suburban density of 43 dph was applied from the start resulting in a capacity of 20 dwellings (a net gain of 18 due to the need to demolish two properties). At suitability stage an issue was identified with distances from the rear of 29 Newcastle Road but the slight change to site area did not affect development capacity. Applying 20% flexibility resulted in a range of 14-22. However, it is not considered to be sufficiently clear that this refers to the net gain, and a main modification is proposed.

What is the site's status in terms of permissions or completions?

A2.64 Planning application 23/0974 for demolition of 19 Newcastle Road and erection of 9 new dwellings to the rear of 19-29 Newcastle Road has a resolution to grant permission subject to Section 106 agreement which is almost finalised. This covers part of the site only but would provide the necessary access. The remaining land is not subject to any planning permission. There was an expired permission 04/0581 for demolition of 11 and 13 Newcastle Road and erection of 13 dwellings to the rear of 3-17 Newcastle Road.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A2.65 There are no particular infrastructure requirements and unusual costs.

A2.66 The identified constraints relate to those in the policy criteria, notably the need to ensure back to back separation from existing properties, which has been taken into

account in setting capacity, and archaeological potential which would be considered at application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A2.67 The area of the site covered by the planning application with resolution to grant permission is considered likely to be available and deliverable within the plan period. The remaining land is in a number of ownerships as rear gardens and there is no specific information on availability. However, the implementation of the planning application providing the access would give a reasonable prospect that a site could be assembled and delivered during the plan period in the medium term.

Are there any main modifications required to the allocation for soundness?

- A2.68 Yes. A main modification is proposed to clarify that the dwelling range in the policy relates to net gain.

SR4c: 169-173 Basingstoke Road

What is the background to the site allocation? How was it identified and which options were considered?

A2.69 The site consists of three industrial or warehouse sites. It emerged from undertaking an Employment Area Analysis in preparing the now-adopted Local Plan (on a very similar basis to the version submitted to support the LPPU [EV010]), which identified that this site was not essential to retain as employment land, which resulted in it being considered in the HELAA for its residential potential and ultimately its inclusion in the Local Plan.

A2.70 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential (50-80 dwellings)
- Higher density residential (more than 100 dwellings)
- Retail or other commercial use (offices, industrial or warehouse)

What is the basis for the scale, type, and use proposed? Is it justified?

A2.71 As the site was no longer considered essential for employment use it was considered appropriate for residential use. Basingstoke Road splits fairly clearly between employment on the west and residential on the east, but this is the only significant employment site on the eastern side, and a residential redevelopment could improve the relationship with neighbouring residential as well as deliver much needed homes.

A2.72 In the 2017 version of the HELAA, the site was assessed at an urban density of 81 dph as being capable of delivering 65 dwellings, which, when 20% flexibility was applied in either direction, resulted in a range of 50-80. In the 2024 version of the HELAA (site ref KA011) the uplifted urban density of 112 dph was applied resulting in a capacity of 90 dwellings and a range of 72-110 (figures over 100 are rounded to the nearest ten).

What is the site's status in terms of permissions or completions?

A2.73 There are no relevant planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A2.74 There are no particular infrastructure requirements and unusual costs.

A2.75 The identified constraints relate to those in the policy criteria, notably air quality, noise, contamination, archaeological potential, the need to ensure appropriate back to back separation to residential to the rear and potential impact on water infrastructure. These can mainly be addressed at application stage and should not represent a particular impediment to the site coming forward, but the need to consult with Thames Water and potentially secure some upgrades could delay the development by several years.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A2.76 The site is not currently available and no landowner has ever confirmed any intention to bring all or part of the site forward for an alternative use. The landowner of 171 Basingstoke Road when contacted during the HELAA process did not expect that part of the site to become available in the plan period. The site is therefore not assumed to be delivered in the plan period, and no delivery is assumed for the purposes of the HELAA, housing trajectory and figure in policy H1. However, it is entirely possible that a site such as this in an otherwise residential location is proposed for development during the plan period and the allocation is therefore considered necessary to retain in an effort to boost housing supply.

Are there any main modifications required to the allocation for soundness?

A2.77 No.

SR4d: 16-18 Bennet Road

What is the background to the site allocation? How was it identified and which options were considered?

- A2.78 The site is a Council-owned employment location within the Bennet Road core employment area. Much of the site is now cleared except for a vacant office and is being used for external storage and parking associated with the Council's Bennet Road depot on the other side of the road. A part of the site is also being used to store vehicles for the repair workshop at 20-22 Bennet Road. The only building is vacant. The site emerged at Local Plan stage through internal discussions as the existing use of the site at the time was no longer required.
- A2.79 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Employment development (B1/B2/B8)
 - Other commercial uses
 - Residential development

What is the basis for the scale, type, and use proposed? Is it justified?

- A2.80 The Core Employment Location means that this site will only be appropriate for employment or closely related uses. This was therefore assessed for industrial and warehouse use. In the 2017 HELAA, a ratio of 3,280 sq m per hectare was applied and the resulting floorspace was 2,427 sq m, converted to 2,200-2,700 by applying 10% flexibility in either direction. In the 2024 HELAA based on more recent information the ratio used was 3,450 sq m per hectare and this resulted in a slightly increased capacity of 2,553 and appropriate range of 2,000-3,100 (with 20% flexibility this time in line with other sites).

What is the site's status in terms of permissions or completions?

- A2.81 There are no relevant planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A2.82 There are no particular infrastructure requirements and unusual costs.
- A2.83 The identified constraints relate to those in the policy criteria, notably archaeological potential, flood risk, contamination and the location of a pumping station close to but not on the site. In terms of flood risk, this relates primarily to surface water flooding and is considered capable of being resolved within the site. Other issues could also be resolved at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A2.84 Internal discussions have indicated that the site would realistically be available early during the plan period. Existing uses on the site are temporary. A planning

application for part of the site containing the vacant office building for a development for a new workshop building of around 600m was submitted in November 2025. It is therefore considered that this site is deliverable within the plan period. Figure 10.1 of the LPPU suggests delivery in the short term, but without any current permissions on the site the medium term is more likely.

Are there any main modifications required to the allocation for soundness?

A2.85 Yes. It is suggested that the site be moved to delivering in the medium term in figure 10.1 of the LPPU to reflect the current situation. This is shown in Appendix 7.

SR4e: Part of Former Berkshire Brewery Site

What is the background to the site allocation? How was it identified and which options were considered?

- A2.86 This is the cleared site of a former bottling plant which formed part of the former Berkshire Brewery. The rest of the former Brewery is now a large Tesco distribution facility. The site was first identified when permission was first granted on it in 1999 (see below). Existing buildings on the site were demolished a number of years ago.
- A2.87 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Employment development (B1/B2/B8) with limited commercial development
 - Non-residential development e.g. hotel
 - Residential development or mixed use

What is the basis for the scale, type, and use proposed? Is it justified?

- A2.88 Given the location surrounded by employment uses and (since 2020) within the AWE Burghfield Detailed Emergency Planning Zone, the suitable use for the site is considered to be employment. The outstanding permission for offices will not be implemented, so the site was considered at Local Plan stage for industrial and warehousing, which was supported by the landowner at the time. In the 2017 version of the HELAA, using an industrial density of 3,280 sq m per hectare, the resulting floorspace was 12,136 sq m. Applying a 20% flexibility in either direction and rounding resulted in a range of 11,000-13,000 sq m. At the point of the 2024 HELAA, the site (ref WH012) had planning permission for 15,080 sq m of industrial or warehouse floorspace, and this formed the basis of the revised range (using the same 20% margins).

What is the site's status in terms of permissions or completions?

- A2.89 The site is covered by a historic planning permission (99/0690) for around 33,000 sq m of offices. This permission was extended multiple times and may still be extant as a result of demolition implementing it, but there is not considered to be a prospect that it will be built out.
- A2.90 Planning permission (19/2054) was granted in April 2021 for redevelopment to provide 15,080 sqm of class B1(c), B2 or B8 floor space in four buildings. This was a five year permission, so is still in place. Development has not yet commenced.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A2.91 The main infrastructure requirement highlighted in the policy is the need for land needed for bus rapid transit to be safeguarded. However, this is unlikely to significantly affect development potential as the developable land is set further back in the site.

A2.92 The identified constraints relate to those in the policy criteria, notably making provision for the green link and landscaped corridor, a landscaped buffer to the watercourses, contamination and impacts on water and wastewater infrastructure. These were dealt with in the existing permission and would therefore likely be capable of being overcome in future proposals.

A2.93 The location within the AWE Burghfield DEPZ provides a constraint on future proposals. Delivery of the existing permission would not be constrained, but alternative proposals would need to be assessed against the Off-Site Emergency Plan, although it should be noted that the historic office consent also forms a baseline position. The Council is confident that employment development will have more limited impacts on the OSEP, subject to inclusion of space within the premises where employees can shelter for up to 48 hours, which could be part of the ancillary office or break room provision. It is therefore considered that future proposals could overcome this constraint.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A2.94 The site is cleared and available to develop, and is considered to be viable and deliverable. There is no further information on the expected timescale but Figure 10.1 of the LPPU states that delivery would be in the short (2023-2028) or medium (2028-2033) terms.

Are there any main modifications required to the allocation for soundness?

A2.95 No.

SR4g: Reading Link Retail Park, Rose Kiln Lane

What is the background to the site allocation? How was it identified and which options were considered?

A2.96 The site is a retail park including retail warehouse units, a recently-developed drive-through coffee shop and a gym currently under construction. It was nominated for inclusion in the LPPU by the owners, Sorbon Estates, through the call for sites exercise in June 2023. The proposed use was mixed use of residential and retail for approximately 200 apartments and 2,300 sqm of retail floor space. The site was subsequently subject to consultation as part of the Consultation on Scope and Content (Regulation 18) and was then included as a draft allocation.

A2.97 The options identified and which were subject to sustainability appraisal were as follows:

- Residential and retail development for 200 homes and reduced retail use.
- Do not allocate
- Residential development only (estimated similar number of dwellings)
- Residential development only with particular focus on family housing (estimated 100 to 150 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

A2.98 As the existing location constitutes out of centre retail there is not considered to be a particular policy basis for its retention. This is a site of significant size that offers an opportunity to make a contribution to meeting identified housing needs, including for family housing. The provision of new retail uses does not offer any particular benefits in terms of strategic need, although provision of some local facilities on site to meet local needs may be appropriate.

A2.99 In the 2024 HELAA, the initial assessment of capacity was based on an urban density of 112 dph which would deliver 237 dwellings. At the stage of suitability analysis a number of adjustments were made. This included removing the areas of the site covered by a Tree Protection Order and allowing a 20m buffer to the adjacent petrol filling station, with these areas also being those affected by Flood Zone 2. It was then assumed that 20% of the site would be developed at a suburban density of 43 dph to soften the transition to the Kennet Meadows major landscape feature immediately to the west, with the remainder at an urban density. This resulted in an adjusted capacity of 185 dwellings. Applying 20% flexibility margins in both directions and rounding to the nearest ten resulted in a range of 150-220 dwellings.

A2.100 The Regulation 19 submission from Sorbon Estates includes a Vision Document which seeks to support a potential of 240 homes, but the detail behind this would need to be assessed further to consider whether this can be suitably accommodated.

What is the site's status in terms of permissions or completions?

A2.101 There are no planning permissions relevant to the proposed allocated use. A gym is currently being constructed on part of the site under planning permission 23/1077.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A2.102 The Sustainable Connectivity and Vehicle Trip Distribution Study [EV017] identified a need for an improved Sunday bus service to improve connections to the town centre, in particular given the lack of access to services and facilities close by. This is reflected in the policy criteria. The scale of the contribution required would need to be considered at planning application stage.

A2.103 The identified constraints relate to those in the policy criteria, notably protected trees, the location adjacent to the major landscape feature, the need for a buffer to the waterway, archaeological potential, potential contamination, air quality, noise and light impacts, and potential impacts on water and wastewater infrastructure. A number of these constraints have been factored into assessing the site capacity whilst others would need to be addressed at planning application stage. In terms of water and wastewater infrastructure, liaison with Thames Water will be required at an early stage to plan in any upgrades required, which may require additional lead in time.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A2.104 The site is in use and not available at the current time. However, the call for sites submission states that the timescale for the site becoming available is likely to be 11-15 years (from 2023). The intention in the long-term is clearly a residential-led development, as supported by the representation from Sorbon Estates within LP007. This is therefore considered to be deliverable in the long term as reflected in the housing trajectory and figure 10.1.

Are there any main modifications required to the allocation for soundness?

A2.105 No.

SR4h: 11 Basingstoke Road

What is the background to the site allocation? How was it identified and which options were considered?

A2.106 The site consists of a BT switching centre and telephone exchange with associated offices and car parking. It was submitted by the landowners TT Group in a representation at LPPU Consultation on Scope and Content (Regulation 18 stage) and was subsequently included in the Pre-Submission Draft after consideration in the 2024 HELAA.

A2.107 The options identified and which were subject to sustainability appraisal were as follows:

- Residential development of 130-200 dwellings
- Do not allocate
- Development for mixed residential and care home use

What is the basis for the scale, type, and use proposed? Is it justified?

A2.108 Assuming that the current use vacates the site, there is little prospect that an alternative occupier could be found for the existing offices as the premises are designed for a specific occupier and contains a significant amount of office floorspace in a location where there is not an established office market. The surrounding areas are residential and this therefore offers a good opportunity for a significant development to help meet residential needs.

A2.109 In the 2024 HELAA this site (ref KA046) was assessed using an urban density of 112 dph. Although the surroundings are a mix of urban and suburban character, this is a large enough site to establish its own urban character without this having detrimental impacts on surrounding areas, and this would reflect the scale of some of the buildings already on the site. This results in a basic capacity of 216 dwellings. However, at suitability stage issues were identified in more detail that led to an adjustment. In particular, it was necessary to remove all areas covered by Tree Preservation Orders, which are extensive on the site, and include a buffer to the rear of residential properties to the south as well as a small element connecting to Northumberland Avenue. It was also considered that the portion of the site facing Christchurch Gardens in the conservation area should be developed at the prevailing surrounding density (62 dph) with the remainder at urban density. This resulted in an adjusted capacity of 168 dwellings. Applying a 20% flexibility margin on either side of this figure and rounding to the nearest ten results in a range of 130-200.

What is the site's status in terms of permissions or completions?

A2.110 There are no planning permissions covering the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A2.111 There are no particular infrastructure requirements and unusual costs other than demolition of the significant amount of development on the site.

A2.112 One of the identified constraints is around access, with the means of access being primarily as existing via Christchurch Gardens. Securing a new access onto the classified Basingstoke Road is unlikely to be acceptable. However, the representation from TT Group identifies that there is an existing secondary access onto Basingstoke Road, and a main modification is therefore proposed to reflect this.

A2.113 Other identified constraints are highlighted in the policy, notably a green link through the site (which could be addressed by the arrangement of open space and landscaping), impact on protected trees, the setting of the conservation area, air quality, ensuring back to back separation of residential and potential impacts on water and wastewater infrastructure. These would need to be addressed at application stage and have been, where relevant, taken into account in assessing development capacity. Liaison with Thames Water would be needed at an early stage to identify any upgrades required and ensure that they are planned in.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A2.114 The site is considered likely to become available in the plan period. The initial submission from TT Group identified that the site could become available within around five years. The representation at Regulation 18 stage stated (footnotes added for clarity):

“Notwithstanding, TTG are currently in the process of reviewing their assets (including this Site) and it is likely that there will be an opportunity in the short-to-medium term for BT to fully vacate the Site. As previously stated, the ZSC¹⁰ is part of the network PSTN¹¹ that will be switched off in December 2025 and the MSC¹² has already essentially ceased operations. Given the Site’s proximity to nearby local centres and the fact that the surrounding area is largely residential in nature, we would be considering a comprehensive residential-led development across the Site.”

A2.115 Therefore there is considered a realistic prospect that the site will become available and will be deliverable within the plan period. Although availability may be in the short to medium term, delivery in the long term is assumed given the scale of the site and the need for demolition of existing premises.

Are there any main modifications required to the allocation for soundness?

A2.116 Yes. A main modification is considered necessary to introduce some additional flexibility regarding access arrangements.

¹⁰ Reading ZSC and Trunk – a part-three / part-five storey 1960s BT switching centre

¹¹ Public Switched Telephone Network

¹² The BT Glasshouse Mobile Switching Centre – a two / three storey modern commercial building, constructed c. 1980s

SR4i: 85-87 Basingstoke Road

What is the background to the site allocation? How was it identified and which options were considered?

A2.117 The site consists of a vacant office building. It was identified through the HELAA process due to expired prior approvals for conversion to residential and was brought into the Regulation 19 version of the LPPU.

A2.118 The options identified and which were subject to sustainability appraisal were as follows:

- Conversion to residential use
- Do not allocate (retain existing office use)
- Redevelopment for residential use at lower typical urban density (up to 6 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

A2.119 The site is well away from the main office locations in Reading in a primarily residential area. It is therefore appropriate for an office conversion. The 2024 HELAA assessed the site (ref KA045) as a conversion rather than redevelopment opportunity as conversion on the HELAA basis of one dwelling per 64 sq m results in a greater potential (15 flats) than a redevelopment at urban density (7 dwellings). A 20% flexibility margin was applied below the figure of 15 but it does not appear to have been applied above, which is an error noted below in relation to main modifications. The range should therefore be 12-18.

What is the site's status in terms of permissions or completions?

A2.120 There are no current permissions on the site. Prior approvals 18/2091 for conversion to 17 flats and 19/0358 for 23 flats have both expired.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A2.121 There are no particular infrastructure requirements and unusual costs.

A2.122 The identified constraints relate to those in the policy criteria, notably contamination, air quality and noise from nearby industrial sites. These would need to be addressed at application stage insofar as they were applicable to the proposal.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A2.123 Although availability has not been confirmed directly with the landowner, the site is a vacant office and appears to be available with a proven interest in conversion to residential. This is not a favoured office location, and the site is therefore considered likely to be available, viable and deliverable in the medium term.

Are there any main modifications required to the allocation for soundness?

A2.124 Yes. The upper limit of the range should be adjusted to reflect 20% above the assessed HELAA capacity in line with other sites.

SR4j: Land at Warwick House, Warwick Road

What is the background to the site allocation? How was it identified and which options were considered?

A2.125 The site consists of land comprising mainly hardstanding in the grounds of Warwick House, a residential home for adults with learning disabilities and mental health needs. It was identified through the HELAA process as it was identified as an expired planning permission for 10 dwellings and brought into the Regulation 19 version of the LPPU.

A2.126 The options identified and which were subject to sustainability appraisal were as follows:

- Residential development of 10 dwellings
- Do not allocate
- Residential development at lower urban density (up to 5 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

A2.127 This is an entirely residential area and residential would be the acceptable use. The 2024 HELAA (site ref RE010) used the apparent expired permission for 10 supported accommodation dwellings as the basis as this is what had been demonstrated to be appropriate for the site. A range was not applied in this case as the site is very small and is not considered likely to be capable of delivering more than 10 dwellings, and the lower end of any range would be below 10 and would therefore fall below the cut-off for inclusion in the plan.

What is the site's status in terms of permissions or completions?

A2.128 In carrying out the HELAA it was considered that the permission had expired. Permission 15/1407 for 10 supported living dwellings was granted in April 2018. However, we have recently noted that a certificate of lawfulness 21/0443 was granted in May 2021 and established that the permission has been implemented meaning that it is still extant. However, no construction of the residential has occurred.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A2.129 There are no particular infrastructure requirements and unusual costs.

A2.130 The only constraint is to ensure appropriate back to back separation from the existing Warwick House. This was considered as part of granting planning permission.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A2.131 The land does not have any current uses on it other than some car parking, and it is likely to be available if a development were to proceed. Information on the current landowner intentions is not known, but given past interest in progressing an application proposal development in the medium term is considered potentially realistic.

Are there any main modifications required to the allocation for soundness?

A2.132 No.

SR4k: Former Sales and Marketing Suite, Drake Way

What is the background to the site allocation? How was it identified and which options were considered?

A2.133 The site forms the sales and marketing suite for the Kennet Island development, a recent development of 1,368 homes that was fully complete in 2019. The suite is now closed and fenced off. It was nominated through the call for sites process in 2023 for a residential development of 23 dwellings. There is also an expired permission on the site. It was subject to consultation in the LPPU Scope and Content document [LP008].

A2.134 The options identified and which were subject to sustainability appraisal were as follows:

- Residential development of 15-23 dwellings
- Do not allocate
- Residential development of 14 dwellings inline with expired permission.

What is the basis for the scale, type, and use proposed? Is it justified?

A2.135 The site is part of a wider residential development and would be appropriate for residential use. It was assessed in the 2024 HELAA (site ref WH048) using an urban density of 112 dph, resulting in a basic capacity of 28 dwellings. However, adjustments were made at suitability stage to retain a landscaped buffer to the brook and pond and entrance road into Kennet Island, and also to exclude the electricity sub station from the calculation, resulting in a revised capacity of 19 dwellings. With a 20% buffer on either side this results in a range of 15-23.

What is the site's status in terms of permissions or completions?

A2.136 There are no current permissions on the site. Planning permission (18/0543) was granted in September 2019 for development for 12 dwellings but expired in 2022. No further applications have been submitted but the landowner considers there is greater potential and has been pursuing this through the call for sites submission.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A2.137 There are no particular infrastructure requirements and unusual costs.

A2.138 The identified constraints relate to those in the policy criteria, notably the need for a landscaped frontage to the A33 given the prominence of this location if this were to be reduced and to the Foudry Brook, potential contamination, air quality and noise issues associated with the road. The landscaped frontage is built into the site capacity, and the remaining issues are capable of being addressed at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A2.139 The site is closed and is available for development, as the existing use is no longer required. The recent progression of a planning application is further evidence that the

site is likely to be deliverable. It has been assumed in the housing trajectory that this would be in the medium term.

Are there any main modifications required to the allocation for soundness?

A2.140 No.

SR4I: Land at Drake Way

What is the background to the site allocation? How was it identified and which options were considered?

A2.141 The site was identified through the HELAA process as it represents an area of vacant land within a recent development subject to a planning permission that has not been built out on this site.

A2.142 The options identified and which were subject to sustainability appraisal were as follows:

- Residential development for 20-30 dwellings
- Do not allocate
- Commercial or office development

What is the basis for the scale, type, and use proposed? Is it justified?

A2.143 The site has an outstanding permission for offices which there appears to be little prospect of being built out. This is not an established office location and it is not clear that there would be adequate demand. The wider Kennet Island development is residential and is served by some services and facilities and dedicated bus links to the town centre. This site was therefore considered appropriate for residential. The 2024 HELAA (site ref WH018) used an urban residential density of 112 dph to calculate a potential of 25 dwellings for the site. Applying 20% flexibility above and below this figure gives a range of 20-30.

What is the site's status in terms of permissions or completions?

A2.144 The site was part of hybrid planning permission 12/0408 granted in 2013 for full permission for a car dealership and outline permission for offices and serviced apartments. The car dealership was completed in 2015-16, but no reserved matters were ever submitted for the other elements. This site was to provide the office uses. A smaller site (judged too small in the HELAA suitability analysis) to the north would have provided the serviced apartments. It has now been 10 years since the main part of the permission was completed, and there appears to be little prospect of the remaining elements being developed.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A2.145 There are no particular infrastructure requirements and unusual costs.

A2.146 The identified constraints relate to those in the policy criteria, notably contamination and noise impacts. These are considered capable of being addressed at application stage particularly since the site adjoins the car park of the dealership and is not adjacent to any areas where servicing takes place.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A2.147 The site is cleared and vacant. There has been no confirmation of availability or intentions from the landowners and they did not respond to contact as part of the

HELAA process. Given the vacancy and the previous development interest on the site, there is considered a realistic prospect of a development coming forward, and with no demolition required or existing uses this could be relatively quick. We therefore consider that this could be realistic in the medium term.

Are there any main modifications required to the allocation for soundness?

A2.148 No.

Appendix 3: West Reading and Tilehurst site information for questions 10.33 to 10.38

WR3b: 2 Ross Road and Meadow Road

What is the background to the site allocation? How was it identified and which options were considered?

- A3.1 This site emerged initially from an assessment of Reading's employment areas to support the now-adopted Local Plan, which was an earlier version of the Employment Area Analysis [EV010]. This was one of a number of sites which were identified as not needing to be protected as part of the Core Employment Area. Those sites were then considered as allocations for alternative uses. In the Richfield Avenue area, this was one of three sites (alongside WR3a and WR3c) that were identified as having potential to be brought into residential use and, in doing so, result in a better relationship and clearer separation between residential and employment uses in the area.
- A3.2 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Allocate for residential (40-60 dwellings)
 - Higher density residential
 - Offices
 - Leisure/retail

What is the basis for the scale, type, and use proposed? Is it justified?

- A3.3 As previously set out, the site was included as a potential residential allocation given its relationship with adjacent residential uses. The 2017 version of the HELAA identified that the site should be used for residential at an initial capacity of 49 dwellings based on an urban density of 81 dph. Applying 20% flexibility in either direction gave a dwelling range of 39-60.
- A3.4 The proposed change to the policy in LP003b is to increase the dwelling range as set out in the 2024 version of the HELAA, where urban densities of 112 dph are applied, which gives a basic site capacity of 67 dwellings. This was reduced to 51 dwellings to incorporate a 20m buffer to employment uses, remove a sub-station and allow for 20m back to back distances to a property on Denbeigh Place. Applying 20% flexibility in either direction gave a dwelling range of 41-61.

What is the site's status in terms of permissions or completions?

- A3.5 The site is now fully cleared after 2 Ross Road was demolished.
- A3.6 There has been no progress on development in line with the allocation. The site is currently subject to a planning application 25/1191 for employment units for flexible uses within E(g)(ii) and (iii), B2 and/or B8 use classes.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A3.7 There are no particular infrastructure requirements and known unusual costs.
- A3.8 The identified constraints relate to those in the policy criteria, notably access and parking restrictions, separation between residential and employment uses, air quality, noise, contamination, back to back residential separation, water infrastructure and flood risk. These would all be capable of being addressed at planning application stage, through layout and design and ensuring compliance with planning conditions. Thames Water would need to be consulted, and should upgrades be required, adequate time for these to be delivered would need to be planned in.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A3.9 The intentions of the landowner are that this site would be developed for employment use. More information is included in the representations made at Regulation 19 stage by CBRE and their Hearing Statement on Matter 1 [EX020]. As such, the site is not currently available for residential use. Should the site become available, there are no known viability and deliverability issues. However, the revised Local Plan Housing Trajectory, included within the Council's Hearing Statement for Matter 3 [EX041] now assumes delivery of zero homes during the plan period to reflect landowner intention.

Are there any main modifications required to the allocation for soundness?

- A3.10 Yes. As there is now no confidence around delivery of residential, Figure 10.1 on p319 should be amended to change the delivery timescale to 'Longer term/unknown'.
- A3.11 Regarding the allocation more generally, the Council maintains that the best long-term option on this site is residential use. The current relationship between residential and employment uses in the area is unsatisfactory, with dwellings and employment uses directly adjoining one another and in some cases sharing access. This site continues to represent an opportunity to improve this relationship.

WR3f: 4 Berkeley Avenue

What is the background to the site allocation? How was it identified and which options were considered?

- A3.12 This site consists of a small vehicle dealership. It was identified in the now-adopted Local Plan as it was the site of an expired permission for residential.
- A3.13 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Residential (10-14 dwellings)
 - Higher density residential
 - Offices/retail

What is the basis for the scale, type, and use proposed? Is it justified?

- A3.14 The 2017 version of the HELAA initially identified that the site was not large enough to deliver at least 10 dwellings at an urban density, but then noted the expired permission for 14 dwellings. However it then reduced the capacity to 12 without specific justification given, and on this basis the range of 10-14 was established. In the 2024 HELAA (site ref CO002) the 14 dwellings from the expired permission were used as the baseline in the first place, and applying 20% flexibility on either side results in a range of 11-17 dwellings.

What is the site's status in terms of permissions or completions?

- A3.15 There is no current planning permission covering the site. The previous permission for 14 dwellings expired in the 2000s.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A3.16 There are no particular infrastructure requirements and unusual costs.
- A3.17 The identified constraints relate to those in the policy criteria, notably air quality, noise and contamination, all of which would be capable of being addressed at application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A3.18 The site is occupied and not currently available. However, given the past interest in developing the site there is considered a realistic prospect of it coming forward during the plan period. However this is most likely in the long term, and a main modification is suggested to address this.

Are there any main modifications required to the allocation for soundness?

- A3.19 Yes. Given the lack of confirmation of availability, the site should be moved into the long-term category in Figure 10.1 of the LPPU.

WR3g: 211-221 Oxford Road

What is the background to the site allocation? How was it identified and which options were considered?

A3.20 The site consists of a Tesco Express store with car parking in front of it. The site was originally included in the Sites and Detailed Policies Document (adopted 2012) as part of a wider allocation including 10 and rear of 8 Prospect Street to the south, and this was carried into the now-adopted Local Plan. The Prospect Street sites have now been delivered for residential and can be excluded from the allocation.

A3.21 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential development with district centre uses on the ground floor
- Development for residential only
- Development for offices with ground floor district centre uses

What is the basis for the scale, type, and use proposed? Is it justified?

A3.22 A development which introduces residential on upper floors into this part of the Oxford Road West District Centre would be in line with policies in the plan and the HELAA therefore proceeded on this basis. As the 2017 HELAA considered this as part of a wider site its conclusions are not particularly relevant now. For the 2024 HELAA, this site (ref CO003) was subject to a site by site approach due to the need to incorporate district centre uses. A 43% footprint to site area was assumed, along with a three storey height suitable for the surrounding character. The ground floor was assumed to be retail or related use and the upper floors residential. The floorspace was converted to dwellings using a figure of 120 sq m per dwelling for a non-town centre site, resulting in 11 dwellings and a net gain of 384 sq m of retail and related uses. At suitability stage a need to remove an area to the immediate rear of 4-6 Prospect Street to ensure appropriate back to back differences and a 10m buffer from Oxford Road for tree planting due to the identified treed corridor. This reduced the site area, but the impact was reduced by reducing the retail floorspace to reflect no net change and this would therefore still yield 11 dwellings. This was converted into a range of 9-13 with a 20% flexibility margin on either side.

What is the site's status in terms of permissions or completions?

A3.23 There are no permissions covering the site. There have been completions on the adjoining sites that were previously part of the allocation for a total of 14 dwellings across four permissions, the most recent of which was in 2022.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.24 There are no particular infrastructure requirements and unusual costs.

A3.25 The identified constraints relate to those in the policy criteria, notably the conservation area and the setting of nearby listed buildings, the identification of

Oxford Road as a treed corridor, back to back distances to surrounding properties, air quality, noise and potential contamination. Some of these have been taken into account in setting the capacity whilst others would be capable of being addressed at application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.26 There is no current information that the site is available. There have been representations from Tesco Stores Ltd regarding other sites but no confirmation of the availability of this site. On this basis it is considered unlikely but not impossible that the site would come forward in the plan period, and Figure 10.1 places this in the longer term/unknown category. No delivery on this site is assumed for the purposes of the HELAA, housing trajectory or figure in policy H1. However, retention of the allocation would be beneficial if it were to come forward as a well-designed development which reflects the building line in this area would be likely to enhance the conservation area.

Are there any main modifications required to the allocation for soundness?

A3.27 No.

WR3h: Rear of 303-315 Oxford Road

What is the background to the site allocation? How was it identified and which options were considered?

A3.28 The site consists of garages and some rear garden and parking land, which has increasingly become a focus for anti-social behaviour. It was included as a residential allocation in the Sites and Detailed Policies Document (adopted 2012) and then carried across to the now adopted Local Plan.

A3.29 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Comprehensive redevelopment for residential (14-20 dwellings)
- Development for commercial
- Development for mixed use residential and commercial
- Development for retail
- Development for community use/leisure

What is the basis for the scale, type, and use proposed? Is it justified?

A3.30 The site is in a residential area, with Western Elms Avenue which the site fronts being almost entirely residential, and is primarily suitable for residential use. In the 2017 HELAA, an urban density of 81 dph was applied to result in a capacity of 18 dwellings but this was reduced slightly to 17 to allow sufficient back to back distances to Oxford Road properties, and with 20% flexibility on either side this meant a range of 14-20 dwellings. By the time of the 2024 HELAA this site (ref BA002) was subject to an application which had a resolution to grant permission that would deliver 13 dwellings, and this was therefore used as the basis. A 20% flexibility margin in either direction gives a range of 10-16.

What is the site's status in terms of permissions or completions?

A3.31 It was resolved to grant permission to application 21/1626 for 13 dwellings and an office building in 2023 subject to completion of a section 106 agreement. The agreement is still being progressed.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.32 There are no particular infrastructure requirements and unusual costs.

A3.33 The identified constraints relate to those in the policy criteria, notably the retention of rear access to Oxford Road properties, that it takes place as a comprehensive development (a reference to a previous suggestion that it may come forward in part only, which given the layout of the site might prevent the rest being developed and might exacerbate anti-social behaviour), avoid adverse impacts on protected trees, air quality, noise and ensuring appropriate back to back separation. These issues were addressed in the planning application.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.34 The site is considered to be available, viable and deliverable. Although there are some activities on the site at the moment, it would be straightforward for these to be removed. The developer responded through the HELAA process to confirm that the site was expected to become available in 2025. Viability was assessed as part of the planning application. The housing trajectory therefore considers that the site could therefore be delivered within the next 5 years.

Are there any main modifications required to the allocation for soundness?

A3.35 No.

WR3i: Land at Portman Way

What is the background to the site allocation? How was it identified and which options were considered?

A3.36 This site is part of an existing allocation in the Local Plan that has mainly been built out. The existing WR3i allocation (Part of Former Battle Hospital, Portman Road) was part of a site first identified as an opportunity for development in the Battle Hospital Planning Brief adopted in 2005 after the closure of Battle Hospital. The main Battle Hospital site was brought forward for development shortly afterwards, but the existing WR3i site remained in use for ancillary facilities including ambulance premises and nurses' accommodation for a longer period. The majority of the site was developed under planning permission 18/0319 for 211 dwellings and the development completed in 2022-23. However, there was one relatively small part of the site comprising an industrial building that was left out of the permission due to still being required at the time, and it is this building that comprises updated policy WR3i.

A3.37 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Development for residential use (160-240 dwellings)
- Mixed use development (commercial and residential)
- Industrial and commercial development

What is the basis for the scale, type, and use proposed? Is it justified?

A3.38 The site is now surrounded by residential uses, and long-term it has always been envisaged that it would have a residential future. The 2024 version of the HELAA (site ref BA002) applies urban densities of 112 dph to result in a basic capacity of 24 dwellings. The site area is slightly reduced to account for retention of TPO trees, resulting in a capacity of 22 dwellings. Applying 20% flexibility in either direction gave a dwelling range of 18-26.

What is the site's status in terms of permissions or completions?

A3.39 There is no permission covering the site. The existing building remains in use.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.40 There are no particular infrastructure requirements and known unusual costs.

A3.41 The identified constraints relate to those in the policy criteria, notably avoiding impacts on TPO trees, flood risk, archaeology and contamination. All of these would need to be addressed at planning application stage in part by planning condition, but the evidence we have does not indicate that they would prevent development coming forward.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.42 The current intentions of the landowner are not known. The understanding was that the site would become available at some point, but no further information is known. For this reason Figure 10.1 of the LPPU suggests that this site could be brought forward in the medium term (2028-2033), and the amended Housing Trajectory spreads delivery over the three year period 2030-2033.

Are there any main modifications required to the allocation for soundness?

A3.43 No.

WR3j: Land at Moultsford Mews

What is the background to the site allocation? How was it identified and which options were considered?

- A3.44 This site was part of the planning permission for the redevelopment of the Battle Hospital site dating from 2004. It was identified and secured in the Section 106 agreement for a healthcare facility as requested by the Primary Care Trust. However, the Trust never took up the facility. As such it has remained a cleared site in a prominent location since the hospital was demolished, even as a significant residential community has grown around it. The site was therefore brought into the existing Local Plan in an effort to bring it into use.
- A3.45 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Residential (10-16 dwellings)
 - Higher density residential
 - Commercial (offices and retail)
 - Mixed use (ground floor retail/office and upper floors residential)

What is the basis for the scale, type, and use proposed? Is it justified?

- A3.46 Given the site's location as part of a new residential community and the lack of interest in commercial uses, it was identified for residential. The 2024 version of the HELAA (site ref BA003) bases the allocation on the planning permission for residential (see below) for 26 dwellings. Applying 20% flexibility in either direction gave a dwelling range of 21-31.

What is the site's status in terms of permissions or completions?

- A3.47 Planning permission for the healthcare facility is still extant, having been implemented as part of the wider development, but it will not be delivered.
- A3.48 Subsequently, planning permission (20/1391) was granted in June 2021 for 26 dwellings with ground floor commercial use. A further planning application (22/0776) for essentially the same development but minus the on-site affordable housing contribution was allowed at appeal in November 2023. These permissions are unimplemented.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A3.49 There are no particular infrastructure requirements and known unusual costs.
- A3.50 The identified constraints relate to those in the policy criteria, notably avoiding impacts on TPO trees, air quality and contamination. All of these would need to be addressed at planning application stage in part by planning condition, but the evidence we have does not indicate that they would prevent development coming forward.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A3.51 The site benefits from full planning permission and viability of the development was assessed at application stage, which led to the elimination of the affordable housing contribution. The modest on-site commercial use (158 sq m) may impact viability, but this is not a requirement of the allocation. The site is fully cleared and ready to develop.
- A3.52 Most recently, the landowner appears to have declared bankruptcy and the site has gone to auction. However, a new owner would have a site ready to develop benefitting from permission minus on-site affordable housing. We therefore consider that delivery in the next five years remains realistic.

Are there any main modifications required to the allocation for soundness?

- A3.53 No.

WR3k: 784-794 Oxford Road

What is the background to the site allocation? How was it identified and which options were considered?

- A3.54 The site contains commercial uses consisting of a tile shop and vehicle workshop. The site was first included as an allocation in the Sites and Detailed Policies Document (adopted 2012), having been identified by officers as an underused site which could deliver a residential development. It was then carried across into the Local Plan.
- A3.55 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Development for residential (10-17 dwellings)
 - Development for commercial
 - Development for mixed use including residential
 - Development for retail
 - Development for community use

What is the basis for the scale, type, and use proposed? Is it justified?

- A3.56 The site adjoins residential areas, and a residential use of this site would better meet identified needs. In the 2017 HELAA an urban residential density of 81 dph was applied resulting in a site capacity of 18 dwellings, which, with 20% flexibility in either direction, resulted in a range of 14-22. The same approach was used in the 2024 HELAA (site ref BA004) but due to the increase in urban density to 112 dph resulted in a capacity of 25 dwellings. This was reduced slightly to 22 dwellings to leave a 10m buffer to Oxford Road for tree planting in accordance with the identified treed corridor.

What is the site's status in terms of permissions or completions?

- A3.57 There are no permissions relating to the site that would deliver the allocation. There is a planning permission (24/0625) dating from March 2025 to add a 250 sq m car workshop building to the existing use but this falls just outside the site boundary on land currently used for car parking.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A3.58 There are no particular infrastructure requirements and unusual costs.
- A3.59 The identified constraints relate to those in the policy criteria, notably the need for a comprehensive development to prevent tensions between residential uses and retained commercial arising within the site, the Oxford Road treed corridor, flood risk, air quality, noise and potential contamination. Where appropriate these have been taken into account in the capacity for the site, and most others would need to be addressed at application stage. In terms of flood risk, although a small part of the site is in Flood Zone 2, the main risk is from surface water. The Level 2 SFRA for the site

[EV038r) confirms that the implications for the development should be manageable but flood risk will need to be considered when placing infrastructure.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.60 There is no existing or previous confirmation of the site's availability. As such it is not considered that it can be assumed that the site will become available or be delivered within the plan period. As such it is in the longer term/unknown category in Figure 10.1 and no delivery is assumed in the HELAA, housing trajectory or policy H1 figure. However, a residential development on this site could significantly enhance this part of Oxford Road and as such it is considered that it is worth retaining the allocation.

Are there any main modifications required to the allocation for soundness?

A3.61 No.

WR3I: 816 Oxford Road

What is the background to the site allocation? How was it identified and which options were considered?

- A3.62 The site consists of a vacant former hire shop. It was first nominated by the landowner through a call for sites exercise for the Local Plan and was thereafter included in the plan.
- A3.63 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Development for residential (13-20 dwellings)
 - Development for commercial
 - Development for mixed use including residential
 - Development for retail
 - Development for community use

What is the basis for the scale, type, and use proposed? Is it justified?

- A3.64 The site adjoins residential areas, and a residential use of this site would better meet identified needs. In the 2017 HELAA an urban residential density of 81 dph was applied resulting in a site capacity of 19 dwellings, but this was reduced to 17 to take account of privacy and overlooking issues from the adjacent Winslet Court. With 20% flexibility in either direction, this resulted in a range of 13-20. The same approach was used in the 2024 HELAA (site ref BA005) but due to the increase in urban density to 112 dph resulted in a capacity of 26 dwellings again reduced to 25 to take account of the same issues with Winslet Court. The range with 20% buffers is therefore 20-30.

What is the site's status in terms of permissions or completions?

- A3.65 There are no permissions relating to the site. A planning application for 24 dwellings (22/0452) was made in 2022 and withdrawn in April 2024.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A3.66 There are no particular infrastructure requirements and unusual costs.
- A3.67 The identified constraints relate to those in the policy criteria, notably the need for tree planting on the Oxford Road treed corridor, air quality, noise, potential contamination and the need for appropriate back to back distances. Where appropriate these have been taken into account in the capacity for the site, and most others would need to be addressed at application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A3.68 The site is vacant and has a recent application for development and is therefore considered to be likely to be available and deliverable in the plan period. It is considered to be deliverable in the medium term.

Are there any main modifications required to the allocation for soundness?

A3.69 No.

WR3n: Amethyst Lane

What is the background to the site allocation? How was it identified and which options were considered?

A3.70 This is a site formerly occupied by various Council-run uses including a day centre. It was included as a site allocation within the now-adopted Local Plan after internal discussions that highlighted that it was likely to become surplus to requirements.

A3.71 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential (32-48 dwellings)
- Higher density residential
- Commercial (offices or retail)
- Community or leisure use

What is the basis for the scale, type, and use proposed? Is it justified?

A3.72 The site is in a residential location and makes the most sense as a residential opportunity. The 2017 version of the HELAA identified that the site should be used for residential at an initial capacity of 46 dwellings based on an urban density of 81 dph. This was reduced to 40 dwellings to assume no development taking place on a small part of the east of the site to avoid privacy issues with adjoining properties. Applying 20% flexibility in either direction gave a dwelling range of 32-48.

A3.73 The proposed change to the policy in LP003b is to include reference to respite care and reduce the dwelling range based on the planning permission for the site of 17 dwellings (adjusted to 20 dwellings based on a dwelling equivalent for the respite care) and applying 20% flexibility either side.

What is the site's status in terms of permissions or completions?

A3.74 The site is wholly covered by planning permission 23/0613, granted in March 2024 for 17 dwellings and respite care. There is also a prior approval for demolition of the existing facilities, which had been completed by end of March 2025. The construction had not started at the latest monitoring exercise in April 2025, but is now underway.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.75 There are no particular infrastructure requirements and unusual costs. Funding for the development is agreed as part of the Council's housebuilding programme.

A3.76 The identified constraints relate to those in the policy criteria, notably back to back separation and water infrastructure. These have all been addressed as part of the planning permission.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.77 The site is owned by the Council and is part of the Local Authority New Build programme, which is part funded by right to buy receipts and part by Section 106 contributions. The site is now cleared, fully owned by the Council and has no known constraints that would affect viability and deliverability. Work on the site began in 2025.

Are there any main modifications required to the allocation for soundness?

A3.78 No.

WR3o: The Meadway Centre, Honey End Lane

What is the background to the site allocation? How was it identified and which options were considered?

A3.79 The site consists of an ageing purpose built shopping precinct with some residential above. Together with the adjacent Asda superstore it comprises the Meadway District Centre. The precinct has declined in recent years with increasing vacancy and some of the buildings are in poor condition. The site has been the subject of past planning permissions for redevelopment or change that have not been implemented. There is also an adopted Meadway Centre Planning Brief¹³ from November 2013 that set out more detail on expectations for any development, and this can be provided if required. Given this history, the site was included in the now-adopted Local Plan.

A3.80 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Develop as district centre
- Residential
- Offices

What is the basis for the scale, type, and use proposed? Is it justified?

A3.81 The key priority here is to retain as a district centre and to better serve the local community in a higher quality environment. This requires a full or partial redevelopment or otherwise significant upgrade. In doing so, it was always envisaged that there may be opportunities for additional residential use but this was not essential to the main priority. At the time of the 2017 HELAA the site still benefitted from planning permission for extension and refurbishment of the precinct which would have delivered an additional 3,908 sq m of retail floorspace and this was used as the basis for the allocation with 20% flexibility margins on either side. By the time of the 2024 HELAA (site ref NO003) that permission had expired and a new planning application for a partial redevelopment of the precinct that would deliver 1,951 sq m additional retail floorspace and 258 dwellings (net gain of 231) had a resolution to grant subject to a Section 106 agreement. This was therefore used as the basis for the allocation. Given that the permission was already considered to be close to the limit of what the site could accommodate, no flexibility buffers were applied and these are the figures that informed the policy.

What is the site's status in terms of permissions or completions?

A3.82 There are no current planning permissions covering the site. There was an expired permission (15/0945) for refurbishment and extension for additional retail. Outline planning application 19/1496 for partial redevelopment for new retail and other district centre uses and 258 dwellings (net gain of 231) reached the stage of a resolution to grant permission subject to Section 106 agreement in 2021. However, the legal

¹³ [Meadway Centre Planning Brief](#)

agreement had not sufficiently progressed and the Council disposed of the application in December 2024. A new application is expected.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A3.83 Development will be complex given the extensive demolition required which may or may not include the whole site depending on the proposal. The Council's preference is for a comprehensive development. The retention of the site as a district centre is absolutely essential with an enhanced diversity of uses. Previous proposals would lead to some loss of car parking, but this was considered to be acceptable. The precinct would also need to better link to the Asda store and include enhanced public realm.
- A3.84 The identified constraints relate to those in the policy criteria, and, other than those referenced above, include retention of important trees and new planting, the landscape and biodiversity importance of the adjacent woodland, the need for a green link on site, ensuring that height is reduced to account for the neighbouring residential properties on Cockney Hill, ensuring design reduces crime and anti-social behaviour, reliance on existing accesses, enhanced cycle access, air quality and contamination. All of these issues were taken into account in resolving to grant the most recent application on which the development capacity is based.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A3.85 The site is in a single ownership and there remains interest in bringing forward a development, and at some point soon there will need to be a solution as the buildings deteriorate. The site was considered deliverable and viable at the most recent application stage, but development would clearly be costly and this may have changed. A timescale for development has not been confirmed by the owners. Given the disposal of the most recent application, it is considered appropriate to push this back in the expected delivery in Figure 10.1 (see below).

Are there any main modifications required to the allocation for soundness?

- A3.86 Yes. The site should be moved in Figure 10.1 to show delivery in the medium and long term. The medium term elements would likely be demolition only with delivery of new floorspace and dwellings in the long term. This accords with what is shown in the updated housing trajectory.

WR3p: Former Alice Burrows Home, Dwyer Road

What is the background to the site allocation? How was it identified and which options were considered?

A3.87 This is the site of a former residential care home which was demolished some years ago. It is currently a cleared site and is Council-owned. The site was initially included as an allocation in the Sites and Detailed Policies Document (adopted 2012) as it was a cleared site that represented a good opportunity for residential development, and was carried across to the now-adopted Local Plan.

A3.88 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Development for residential and/or residential care (17-27 dwellings)
- Commercial development
- Leisure or community use

What is the basis for the scale, type, and use proposed? Is it justified?

A3.89 The site is in a residential location and makes the most sense as a residential opportunity. The 2017 version of the HELAA identified that the site should be used for residential at an initial capacity of 22 dwellings based on a suburban density of 46 dph. Applying 20% flexibility in either direction gave a dwelling range of 18-27.

A3.90 The proposed change to the policy in LP003b is to increase the dwelling range based on the planning permission for the site of 30 dwellings and applying 20% flexibility either side.

What is the site's status in terms of permissions or completions?

A3.91 The site is wholly covered by planning permission 23/0612, granted in March 2024 for 30 dwellings. Development on the site commenced in December 2025.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.92 There are no particular infrastructure requirements and unusual costs. Funding for the development is agreed as part of the Council's housebuilding programme.

A3.93 The identified constraints relate to those in the policy criteria, notably the access point, important trees and archaeology. These have all been addressed as part of the planning permission.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.94 The site is owned by the Council and is part of the Local Authority New Build programme, which is part funded by right to buy receipts and part by Section 106 contributions. The site is cleared, fully owned by the Council and has no known constraints that would affect viability and deliverability. Work on the site began in 2025.

Are there any main modifications required to the allocation for soundness?

A3.95 No.

WR3r: Former Charters Car Sales, Oxford Road

What is the background to the site allocation? How was it identified and which options were considered?

A3.96 The site is a now vacant former car dealership. It was initially identified through the 2017 HELAA process as a development opportunity as there had been a withdrawn application from 2014 on part of the site for a block of six flats. Following the HELAA it was included in the now-adopted Local Plan.

A3.97 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential (12-18 dwellings)
- Higher density residential development (more than 30 dwellings)
- Commercial (offices or retail)

What is the basis for the scale, type, and use proposed? Is it justified?

A3.98 The site is in a generally residential location and a residential development would therefore be appropriate. In the 2017 version of the HELAA, a suburban density of 46 dph was applied reflecting the prevailing density and height in the area resulting in a capacity of 15 dwellings, and with the 20% flexibility margins on either side this resulted in a range of 12-18 dwellings. In the 2024 HELAA the suburban density applied was now 43 dph, resulting in a reduced capacity of 14. However, at suitability stage this was reduced further to 10 to account for removal of the small area of priority habitat and a 10m buffer to road for tree planting to reflect its status as a treed corridor, which would also include the existing protected tree. With 20% flexibility margins this would mean a range of 8-12.

What is the site's status in terms of permissions or completions?

A3.99 There are no planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.100 There are no particular infrastructure requirements and unusual costs.

A3.101 The identified constraints relate to those in the policy criteria, notably the location of the access from a classified road, potential visual impacts on the major landscape feature of the Thames Valley, biodiversity issues on the priority habitat, protected trees, the identification of Oxford Road as a treed corridor, air quality, noise, potential contamination and the two storey character of Oxford Road residences. All of these were either taken into account in setting the capacity for the site or would need to be dealt with at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.102 Although the landowners have not confirmed availability, a planning application (24/1500) was made for 32 homes and refused in February 2025. The site was put up for sale in October 2025. It is therefore considered likely to be available for development, depending on the intentions of any new owners. On this basis a delivery in the medium term appears likely and is assumed within the amended housing trajectory.

Are there any main modifications required to the allocation for soundness?

A3.103 No.

WR3s: Land at Kentwood Hill

What is the background to the site allocation? How was it identified and which options were considered?

A3.104 The full background to the allocations (along with WR3t) is set out in answer to question 10.40.

A3.105 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not change allocation, retain as open space
- Develop the whole area for housing (200-250 dwellings)
- Only develop previously developed areas (11-17 dwellings)
- Develop entire area except for the recreation ground
- Develop land fronting Kentwood Hill for housing (41-62) dwellings

A3.106 At LPPU stage there was also an alternative option as part of EN7 to include extending the Local Green Space designation to cover this site.

What is the basis for the scale, type, and use proposed? Is it justified?

A3.107 In the 2017 version of the HELAA, the whole allotments land including what is now WR3s, WR3t and significant nearby land totalling 6.7 ha was assessed together. At a suburban density of 46 dph, this area had a basic capacity of 307 dwellings. However, at suitability stage most of this land was excluded for the following reasons:

- exclude Victoria Recreation Ground
- exclude the copse (The Withies) comprising Biodiversity Action Plan habitat, an area TPO and major landscape feature
- exclude the in-use allotments north/west of The Withies
- include a landscape buffer to Kentwood Hill and Armour Hill
- include a green link through Kentwood Hill site.

This left one suitable area on Kentwood Hill with a capacity of 51 dwellings (now WR3s) and one suitable area on Armour Hill with a capacity of 15 dwellings (now WR3t). Applying 20% flexibility in either direction to the Kentwood Hill site gives a range of 41-62.

A3.108 The 2024 version of the HELAA dealt with the WR3s site (ref KE002) separately from its surroundings. The first stage was application of a suburban density of 43 dph to give a basic capacity of 65 dwellings. However, substantial amendments were made at suitability stage, firstly to remove the area of land where a protected species had been identified and a 30m radius of that sensitivity, which also covers most of the most important trees and the area identified for a green link, as well as to allow a 10m buffer to Kentwood Hill for landscaping as required by the policy. This resulted in an adjusted capacity of 40 dwellings, which expressed as a range with 20% flexibility in either direction is 32-48.

What is the site's status in terms of permissions or completions?

A3.109 There are no planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.110 The main potential infrastructure requirement is the potential need for improvements to the junction of Kentwood Hill, Norcot Road and School Road. This would need to be assessed in detail at application stage and improvements secured through Section 106 agreement if necessary.

A3.111 In terms of constraints, the site has been proposed as a larger Local Wildlife Site. The progress of this proposal is dealt with in relation to question 10.39. The Council does not believe that the area identified for development is likely to be of sufficient biodiversity value to qualify, but it will not be a Council decision and it would be incompatible with the approach of policy EN12 to identify a site for development if it were a LWS. This has therefore been added to the policy text as a caveat.

A3.112 The other identified constraints relate to those in the policy criteria, notably the need for a landscaped border to Kentwood Hill, the need to incorporate green links, important and protected trees, surrounding biodiversity value, impacts on views and important landscape, potential archaeology, land stability (identified as a potential constraint after to a collapse in the highway on Armour Hill in December 2018) and impact on water and wastewater infrastructure. Many of these have been factored into the site capacity as described above. Others will require assessment at application stage. Water and wastewater infrastructure would need early engagement with Thames Water, which if not done in a timely manner could lead to a longer lead-in time whilst upgrades are put in place.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.113 The site does contain a small builders yard use, but otherwise is available for development, and the landowner has engaged a development partner to bring it forward as referenced in Tilehurst People's Local Charity's response at Regulation 19 stage. An application is expected shortly. This is considered to be realistic in the medium term, up to 2033.

Are there any main modifications required to the allocation for soundness?

A3.114 Yes. The response from Tilehurst People's Local Charity seeks recognition that mitigation measures can be put in place for land instability. This is considered appropriate for the policy to be consistent with national policy, and a modification is proposed in Appendix 7.

WR3t: Land at Armour Hill

What is the background to the site allocation? How was it identified and which options were considered?

A3.115 The full background to the allocations (along with WR3s) is set out in answer to question 10.40.

A3.116 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not change allocation, retain as open space
- Develop the whole area for housing (200-250 dwellings)
- Develop entire area except for the recreation ground
- Develop land fronting Armour Hill for housing (12-18) dwellings

A3.117 At LPPU stage there was also an alternative option as part of EN7 to include extending the Local Green Space designation to cover this site.

What is the basis for the scale, type, and use proposed? Is it justified?

A3.118 In the 2017 version of the HELAA, the whole allotments land including what is now WR3s, WR3t and significant nearby land totalling 6.7 ha was assessed together. At a suburban density of 46 dph, this area had a basic capacity of 307 dwellings. However, at suitability stage most of this land was excluded for the following reasons:

- exclude Victoria Recreation Ground
- exclude the copse (The Withies) comprising Biodiversity Action Plan habitat, an area TPO and major landscape feature
- exclude the in-use allotments north/west of The Withies
- include a landscape buffer to Kentwood Hill and Armour Hill
- include a green link through Kentwood Hill site.

This left one suitable area on Kentwood Hill with a capacity of 51 dwellings (now WR3s) and one suitable area on Armour Hill with a capacity of 15 dwellings (now WR3t). Applying 20% flexibility in either direction to the Armour Hill site gives a range of 12-18.

A3.119 In the 2024 HELAA, the WR3t site (ref KE003) was initially assessed using a suburban density of 43 dph, resulting in an initial capacity of 18 dwellings. At suitability stage, the car park that would need to be removed or reprovided was removed from the site area, as was any land within 30m of the areas identified as containing a protected species and a 10m buffer to Armour Hill for landscaping, which reduced the capacity to 12 dwellings. This was expressed as a range of 10-14 with 20% flexibility in either direction.

What is the site's status in terms of permissions or completions?

A3.120 There are no planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.121 The main potential infrastructure requirement is the potential need for improvements to the junction of Kentwood Hill and Armour Hill. This would need to be assessed in detail at application stage and improvements secured through Section 106 agreement if necessary. There is also a need to ensure that parking and access for the allotments is maintained and does not result in it being reprovided on the allotment land, thus reducing the amount of space available for allotment use.

A3.122 In terms of constraints, the site has been proposed as a larger Local Wildlife Site. The progress of this proposal is dealt with in relation to question 10.39. The Council does not believe that the area identified for development is likely to be of sufficient biodiversity value to qualify, but it will not be a Council decision and it would be incompatible with the approach of policy EN12 to identify a site for development if it were a LWS. This has therefore been added to the policy text as a caveat.

A3.123 The other identified constraints relate to those in the policy criteria, notably the need for a landscaped border to Armour Hill, important and protected trees, surrounding biodiversity value, impacts on important landscape, potential archaeology, land stability (identified as a potential constraint after to a collapse in the highway on Armour Hill in December 2018) and impact on water and wastewater infrastructure. Many of these have been factored into the site capacity as described above. Others will require assessment at application stage. Water and wastewater infrastructure would need early engagement with Thames Water, which if not done in a timely manner could lead to a longer lead-in time whilst upgrades are put in place.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.124 The site is available for development, and the landowner has engaged a development partner to bring it forward as referenced in Tilehurst People's Local Charity's response at Regulation 19 stage. An application is expected shortly. This is considered to be realistic in the medium term, up to 2033.

Are there any main modifications required to the allocation for soundness?

A3.125 Yes. The response from Tilehurst People's Local Charity seeks recognition that mitigation measures can be put in place for land instability. This is considered appropriate for the policy to be consistent with national policy, and a modification is proposed in Appendix 7.

WR3u: 132-134 Bath Road

What is the background to the site allocation? How was it identified and which options were considered?

A3.126 This site consists of a building containing a number of workshop units and external parking accessed off Bath Road. The site was nominated by the landowner through the call for sites process in 2023 for either residential development only (estimated 44 dwellings) or mixed use commercial and residential. Subsequent communication confirmed that a wholly residential development was the preference.

A3.127 The options identified and which were subject to sustainability appraisal were as follows:

- Residential development (44 dwellings)
- Mixed use commercial and residential
- Do not allocate
- Residential development at typical suburban densities
- Redevelopment for employment uses

What is the basis for the scale, type, and use proposed? Is it justified?

A3.128 With clarification from the owners that the residential use was the preference and that the potential for a mix was mainly in case there was difficulty with an enhanced access, residential use was the best option, in line with the site's surroundings. In the 2024 HELAA (site ref SO009) a suburban density of 43 dph was used in line with the prevailing 2 storey density of the surrounding area. This resulted in a capacity of 22 dwellings. This was very slightly reduced to 21 dwellings to allow appropriate distances to the rear of 33-34 Burrcroft Road. With a 20% flexibility in either direction there is a range of 15-25.

What is the site's status in terms of permissions or completions?

A3.129 There are no planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.130 The existing access would need to be upgraded as it is unlikely to be sufficient to accommodate a residential development of this scale. The width of the current access is just less than 5m, and would need demolition of the building to the east (included within the site) to be upgraded. This is reflected in the policy criteria.

A3.131 The identified constraints relate to those in the policy criteria, notably air quality, noise, potential contamination, ensuring appropriate back to back distances and the need to avoid discharging water to a public sewer. These issues should be capable of being addressed at application stage. The latter was an issue identified in Thames Water representations at Regulation 18 stage and was confirmed in the Level 2 SFRA for the site EV038p, which was prepared due to the level of surface water flood risk on site. However, the level of surface water flood risk is not identified as a

criterion in the policy and this should be rectified as a main modification in line with other allocations.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.132 The site is currently occupied but the call for sites submission in 2023 anticipated the site becoming available within 5 years, which would suggest that delivery in the medium term is realistic. The site is therefore considered likely to become available and would be deliverable.

Are there any main modifications required to the allocation for soundness?

A3.133 Yes. There should be a main modification to reflect the level of surface water flood risk as referenced above.

WR3v: Former Southcote Library, Coronation Square

What is the background to the site allocation? How was it identified and which options were considered?

A3.134 This is the site of the former Southcote Library. The library is now closed and has moved to the nearby Southcote Community Hub. The site is therefore surplus to requirements and is Council-owned. Following internal discussions which revealed the site's availability it was consulted upon as a potential site allocation in the Consultation on Scope and Content (Regulation 18) [LP008].

A3.135 The options identified and which were subject to sustainability appraisal were as follows:

- Residential development
- Do not allocate
- Community development

What is the basis for the scale, type, and use proposed? Is it justified?

A3.136 Although the site is in an identified district centre, it is surplus to requirements for community use and was therefore considered as a residential development. It was assessed in the 2024 HELAA (ref SO012) using an urban density of 112 dph due to its district centre location which resulted in a dwelling capacity of 19. Applying 20% flexibility margins in either direction resulted in a range of 15-23,

What is the site's status in terms of permissions or completions?

A3.137 Prior approval (24/1059) was given in October 2024 for the demolition of the library building. The cover letter makes clear that this is to facilitate the delivery of affordable housing on the site, but no application for the development has yet been submitted. Demolition has now been carried out.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.138 There are no particular infrastructure requirements and unusual costs.

A3.139 The identified constraints relate to those in the policy criteria, notably potentially important trees on site and the potential impact on wastewater infrastructure. The latter would require consultation with Thames Water and may require additional time for upgrades to be put in place. These constraints should not prevent development.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.140 The site is now cleared, and is Council-owned and available for the delivery of affordable housing, which is the intention. This should be deliverable as part of the Council's Local Authority New Build programme, which is part funded by right to buy receipts and Section 106 affordable housing contributions. This is considered to be deliverable towards the end of the first five years of the plan period.

Are there any main modifications required to the allocation for soundness?

A3.141 No.

WR3w: Part of Tesco Car Park, Portman Road

What is the background to the site allocation? How was it identified and which options were considered?

A3.142 The site forms the north west corner of the car park for the Tesco Extra store on Portman Road. The site was put forward as part of a response to the LPPU Consultation on Scope and Content (Regulation 18), at a similar time that a planning application for the site for 80 homes was under consideration.

A3.143 The options identified and which were subject to sustainability appraisal were as follows:

- Residential development of 80 apartments
- Do not allocate
- Residential development at typical urban densities (46-68 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

A3.144 The site represents an opportunity to utilise an underused area of car parking and a little used grassed area to help meet residential needs. The 2024 HELAA based its initial capacity for the site (ref BA025) on an urban density of 112 dph resulting in 66 dwellings. However, the site is directly adjacent to the service access for the Tesco store and there is potential for this to create noise and disturbance for residents. As a result the site area was reduced to allow a 10m buffer to this access and this reduced the capacity to 57 dwellings. Applying 20% flexibility on either side results in a range of 46-68 dwellings.

What is the site's status in terms of permissions or completions?

A3.145 There is no planning permission for the site. Application 23/1041 for 80 dwellings is currently still undetermined and amended plans are anticipated early in 2026.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.146 The draft policy includes reference to contributing to enhanced bus priority on Vastern Road and an extension and bifurcation of the BUZZ18 bus route. These were measures that were identified in the Sustainable Connectivity and Vehicle Trip Distribution Analysis [EV017]. The level of contribution needed is not specified but this would be a matter for consideration at planning application stage.

A3.147 One of the identified constraints regards the access, and the policy currently states that the existing access via the car park should be used. Whilst a wholly new access on the classified road would not be unacceptable, it is agreed that there is not at this stage sufficient basis to rule out upgrading the service access for this purpose subject to a justification demonstrating that it would not compromise operation and safety of the highway, and a main modification is proposed.

A3.148 The other identified constraints relate to those in the policy criteria, notably protected trees, flood risk, noise and light issues relating particularly to the service access and filling station, potential contamination and impacts on water and wastewater

infrastructure. The issues with the service access have been addressed in setting site capacity, whilst most of the others would be capable of being addressed at planning application stage. The Level 2 SFRA for the site [EV038j] identifies that a residential development of the site should be possible as none of it is within Flood Zone 3. In terms of water and wastewater, this would require liaison with Thames Water and may require additional time to upgrade infrastructure.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.149 The site is considered to be available, viable and deliverable. The representations from Tesco at Regulation 19 stage consider that the site can be delivered in the short term rather than the medium term which is currently outlined. The developer, Ridgepoint Homes, also responded through the HELAA process to confirm that the site is already available, and has made a response at Regulation 19 stage. However, the Council is mindful of national policy that sites without full permission should not generally be part of five year supply, and as five year supply is linked to the trajectory, the assumption is medium term delivery.

Are there any main modifications required to the allocation for soundness?

A3.150 Yes. As referenced above, it is agreed that the policy criterion on access should include a greater degree of flexibility subject to justification at application stage.

WR3x: 1-15 St Georges Road

What is the background to the site allocation? How was it identified and which options were considered?

A3.151 The site consists of a vehicle repair premises. It was identified through the HELAA process as it is subject to a planning application for residential development and was included in the Pre-Submission version.

A3.152 The options identified and which were subject to sustainability appraisal were as follows:

- Residential development
- Do not allocate
- Development for mixed residential and commercial use

What is the basis for the scale, type, and use proposed? Is it justified?

A3.153 The site is in a residential area and offers an opportunity to help to meet residential needs. In the 2024 HELAA this site (NO006) was subject to an urban density of 112 dph which led to a capacity of 14 dwellings. A slight adjustment was made to the site area at suitability stage to account for back to back distances with Beecham Road properties but this was not sufficient to have any impact on site capacity, A 20% buffer on either side was applied for flexibility resulting in a range of 11-17 dwellings.

What is the site's status in terms of permissions or completions?

A3.154 There is no planning permission relating to the site. There is an outstanding planning application for residential development for 10 dwellings on the site (22/1255) on which new information has been submitted during 2025.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.155 There are no particular infrastructure requirements and unusual costs.

A3.156 The identified constraints relate to those in the policy criteria, notably potential contamination, air quality, back-to-back separation from existing residential and potential impacts on water and wastewater infrastructure. These should be capable of being addressed at application stage. In the case of water and wastewater infrastructure, liaison with Thames Water will be required, and this may require upgrades that may delay development whilst they are put in place.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.157 The site is currently occupied, but is subject to a current planning application for residential development, and as such it is considered that the site would be available, viable and deliverable in the plan period. However without any direct confirmation of this through the HELAA process it was considered that it should be identified for delivery in the long term.

Are there any main modifications required to the allocation for soundness?

A3.158 No.

WR3y: 72 Berkeley Avenue

What is the background to the site allocation? How was it identified and which options were considered?

A3.159 The site consists of a large Victorian property currently used as a day nursery. It was nominated by the owner for residential use through the call for sites process in June 2023 and was included for consultation in the LPPU Consultation on Scope and Content (Regulation 18). The site was also included in a first Pre-Submission Draft version of the Sites and Detailed Policies Document in 2010 but was removed from a second Pre-Submission Draft as permission for residential use had been granted on the site.

A3.160 The options identified and which were subject to sustainability appraisal were as follows:

- Residential conversion only (10-12 dwellings)
- Residential redevelopment (estimated at 25-35 dwellings)
- Conversion plus additional development (20-30 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

A3.161 As the proposal is in a generally residential area and proposed for residential use this is the use for which it is most suitable. However, this is likely to be considered a non-designated heritage asset set in ample grounds, and any additional development would need to be appropriately justified. For this reason a conversion to residential only was assumed in the 2024 HELAA (site ref CO013) and calculated on the basis of one dwelling per 64 sq m would deliver 11 dwellings. With a 20% flexibility on either side this gives a range of 9-13.

A3.162 However, the HELAA process did not take account of the past planning permission which did include some additional new build development of 4 dwellings. As this has previously been justified and circumstances in the area have not substantially changed it is considered that a main modification to the policy to support some carefully designed and sited additional development would be appropriate. As that past permission was for 10 dwellings total (6 as conversion and 4 as additional development) this would not be expected to require a change to the dwelling range.

What is the site's status in terms of permissions or completions?

A3.163 There is no planning permission affecting the site. An expired planning permission (10/1044) as described above existed for 10 dwellings on the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A3.164 There are no particular infrastructure requirements and unusual costs.

A3.165 The identified constraints relate to those in the policy criteria, notably protected trees and air quality issues. A conversion only would not be expected to impact on protected trees, and some additional development was previously demonstrated to be acceptable on the site. Air quality would be addressed at application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A3.166 Availability of the site is dependent on the nursery moving to an alternative location which as it stands would be Yeomanry House on Castle Hill. There is a planning permission for nursery use of Yeomanry House which is currently unimplemented, but in view of this the site has been removed as a residential allocation in the LPPU, so there is a route for the site to become available. Therefore this site is considered likely to become available, has no known viability issues and would be deliverable in the medium term.

Are there any main modifications required to the allocation for soundness?

A3.167 Yes. As set out above, a main modification would be necessary to reflect that additional development has previously been deemed acceptable through the planning application process.

Appendix 4: Caversham and Emmer Green site information for questions 10.45 to 10.50

CA1a: Reading University Boat Club, Thames Promenade

What is the background to the site allocation? How was it identified and which options were considered?

- A4.1 The site consists of a boat club building close to the River Thames. It was nominated by the owners, the University of Reading, for inclusion in the now-adopted Local Plan through the call for sites process in 2015, and was subsequently included as an allocation.
- A4.2 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Residential development only in Flood Zone 2 (16-25 dwellings)
 - Higher density residential (over 40 dwellings)
 - Leisure uses associated with meadows

What is the basis for the scale, type, and use proposed? Is it justified?

- A4.3 The land is expected to be surplus to requirements in its current use and adjoins residential uses to the east and west. It is therefore considered potentially appropriate for residential use. As part of the 2017 HELAA the site was considered using an urban density of 81 dph resulting in an initial capacity of 45 dwellings. However a significant downward adjustment was made at suitability stage to ensure that areas within Flood Zone 3 were not developed, which resulted in a capacity of 20 dwellings. Applying 20% flexibility in either direction resulted in a range of 16-25 dwellings. In the 2024 HELAA (site ref TH026) an identical process was followed, with a higher initial capacity of 63 dwellings due to uplifted urban density of 112 dph, but again substantially reduced at suitability stage to 23 dwellings to exclude areas in Flood Zone 3. The 20% flexibility margins result in a range of 18-28.

What is the site's status in terms of permissions or completions?

- A4.4 There are no planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A4.5 There are no particular infrastructure requirements and unusual costs.
- A4.6 The identified constraints relate to those in the policy criteria, notably impacts on the Thames Valley major landscape feature, flood risk, provision of a green link across the site, the setting of the listed war memorial, air quality and archaeological potential. There have been substantial reductions to the assessed capacity made to account for flood risk. The Level 2 SFRA for the site [EV038c] identifies barriers to residential development including the portion of the site within Flood Zone 3b and the need to raise infrastructure above the design flood level, but the exclusion of development in Flood Zone 3 as set out in the policy criteria should account for this.

This would also reduce any impacts on the major landscape feature. Other issues would be capable of being addressed at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A4.7 At the time that the site was nominated for inclusion, it was noted that the University's facility near Thames Valley Park (within Wokingham Borough) would be available for the uses currently on site to move to, and the site would become available within 1-5 years. That alternative facility is in operation and it is therefore considered that the site could become available within the plan period. The University of Reading continues to support its allocation in its responses to the LPPU, including any changes, but has not provided any additional information on availability. There is nevertheless considered to be a good prospect of the site being delivered in the plan period.

Are there any main modifications required to the allocation for soundness?

- A4.8 No.

CA1c: Land at Lowfield Road

What is the background to the site allocation? How was it identified and which options were considered?

- A4.9 The site is a former mobile homes site, currently in temporary use for accommodation for homeless people. It is owned by the Council. It was initially included as an allocation for residential development in the Sites and Detailed Policies Document (adopted 2012) and was carried across to the now-adopted Local Plan.
- A4.10 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Development for residential (24-36 dwellings)
 - Cemetery use

What is the basis for the scale, type, and use proposed? Is it justified?

- A4.11 The site is in a residential area and all previous and current uses have involved some form of residential accommodation. Residential is therefore the most appropriate use for the site. In the 2017 HELAA, the site was initially assessed using a suburban density of 46 dph, reflecting the prevailing character of the area, as being capable of accommodating 43 dwellings, but this was reduced to 30 due to the fringe of the site being identified as priority habitat and to exclude those parts of the site needed to maintain footpath access. Using a 20% flexibility margin in either direction resulted in a range of 24-36 dwellings. In the 2024 HELAA (site ref EG002) was again considered using a suburban density, this time of 43 dph, with an initial capacity of 40 dwellings identified, but adjustments again took place at suitability stage. This reduced the site to exclude the Local Wildlife Site and to retain the existing landscaped strip along the east of the site as a buffer to the LWS. This resulted in a capacity of 26 dwellings, to which 20% flexibility in either direction was applied to arrive at a range of 21-31 dwellings.

What is the site's status in terms of permissions or completions?

- A4.12 The site has no planning permission for a permanent residential use. The temporary use for homeless accommodation is under planning permission 22/0304 and condition 1 requires the use to cease and the site to be restored by 21st July 2032.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A4.13 There are no particular infrastructure requirements and unusual costs.
- A4.14 The identified constraints relate to those in the policy criteria, notably protected trees, retention of woodland and protection of wider biodiversity interest, potential contamination, impacts on the adjacent major landscape feature and archaeological potential. These should be capable of being addressed at planning application stage, particularly since those that would affect the potential for development have been taken into account when setting the capacity, with the most sensitive areas excluded from the area used as the expected development extent.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A4.15 The site would become available when the temporary use ceases in July 2032. The site is wholly owned by the Council and could be brought forward for residential development within the plan period. Given the timescale for availability of the site this has been identified for development in the long term.

Are there any main modifications required to the allocation for soundness?

A4.16 No.

CA1d: Rear of 200-214 Henley Road, 12-24 All Hallows Road & 7 & 8 Copse Avenue

What is the background to the site allocation? How was it identified and which options were considered?

- A4.17 The site consists of a number of rear gardens. It was nominated by a developer through the call for sites exercise in preparing the Local Plan in September 2015.
- A4.18 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Residential development (17-25 dwellings)
 - Only develop gardens behind homes on All Hallows Road (northern part)
 - Only develop gardens behind homes along Henley Rd (southern part)

What is the basis for the scale, type, and use proposed? Is it justified?

- A4.19 Given the rear garden nature of the site, the only potential suitable use would be for residential. In the 2017 HELAA, a suburban density of 46 dph was applied to the site resulting in an initial capacity of 40 dwellings. However, at suitability stage this was reconsidered, and the average density of the surrounding areas (27 dph) was used instead. This is not because 40 dph would necessarily be inappropriate, but the prevailing density was a useful proxy to take into account the unusual shape of the site and the fact that it is divided into two elements. A reduction in site area was also made to remove important trees and to allow for a green link. This meant a reduced capacity of 21 dwellings, which, with 20% flexibility on either side meant a range of 17-25.
- A4.20 In the 2024 HELAA (site ref EG003) a suburban density was again initially applied, this time 43 dph, which would have meant a capacity of 37 dwellings. However substantial reductions were again made at suitability stage. These included removing the site of two new houses at 4 Copse Avenue, removing the garden of 12 All Hallows Road to avoid impacts on a protected tree and removing 10% of the remainder as a green link, leaving a reduced site area of 0.71 ha. As above, the prevailing density of Overton Drive is 27 dph so a development at 30 dph is more likely to be appropriate. This resulted in the same figure of 21 dwellings and no change to the range.

What is the site's status in terms of permissions or completions?

- A4.21 Two dwellings at 4 Copse Avenue were permitted under permission 18/1306 and have been completed. This part of the site is proposed to be removed from the allocation.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A4.22 There are no particular infrastructure requirements and unusual costs.
- A4.23 The identified constraints relate to those in the policy criteria, notably ensuring that the existing access points are used, avoiding impacts on neighbouring priority

habitat, an identified green link across the site, archaeological potential, air quality, potential contamination and back-to-back separation from existing residential properties. As noted above, significant alterations were made to development capacity to account for those issues that are likely to restrict the parts of the site that could be developed, whilst others would be capable of being addressed at application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A4.24 The site has not to our knowledge been assembled as a single landholding and remains owned by individual homeowners. Bringing forward the site would require land assembly or a more piecemeal approach, which is what has taken place so far. However, there is considered a realistic prospect of development of all or a large part of the site taking place in the plan period.

Are there any main modifications required to the allocation for soundness?

- A4.25 No.

CA1e: Rear of 13-14a Hawthorne Road & 284-292 Henley Road

What is the background to the site allocation? How was it identified and which options were considered?

- A4.26 The site consists of rear gardens. It was nominated by a developer through the call for sites exercise in preparing the Local Plan in September 2015.
- A4.27 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Residential development (9-13 dwellings)
 - Higher density residential (more than 20 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

- A4.28 Given the rear garden nature of the site, the only potential suitable use would be for residential. In the 2017 HELAA the capacity of the site was initially calculated using a suburban density of 46 dph, resulting in a capacity of 17 dwellings being identified. At suitability stage an adjustment was made to reflect the fact that the only logical approach is to develop in a linear manner aligned with the current road layouts of Maytree Walk and Montfort Gate and also to reflect their character, and this resulted in a reduced capacity of 11 dwellings. Application of 20% flexibility in either direction gives a range of 9-13.
- A4.29 In the 2024 HELAA, the site (ref EG005) was again initially assessed using a suburban density which by this point had been revised to 43 dph, which meant an initial capacity of 16 dwellings. At suitability stage, the land that had already been developed for dwellings on Montfort Gate (see below) was removed. Again, the capacity was adjusted to reflect the need for a linear development. This resulted in a final capacity of 10 dwellings, and a range of 8-12 with 20% flexibility margins.

What is the site's status in terms of permissions or completions?

- A4.30 Since the site was initially included in the plan, four dwellings were completed under permission 16/1183 on land to the rear of 282 Henley Road, so this part of the site is proposed to be removed from the allocation. There was a planning permission (19/0592) for one new dwelling on land to the rear of 292 Henley Road which expired in 2024.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A4.31 There are no particular infrastructure requirements and unusual costs.
- A4.32 The identified constraints relate to those in the policy criteria, notably the need to ensure access from Maytree Walk due to the road being better designed to accommodate additional traffic than Montfort Gate, impact on protected trees, archaeological potential and air quality. These issues have been taken into account in the site capacity or would need to be dealt with at planning application stage.

There is an existing criterion relating to biodiversity, but in the 2024 HELAA no particular sensitivities were noted so this is proposed to be removed.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A4.33 The site has not to our knowledge been assembled as a single landholding and remains owned by individual homeowners. Bringing forward the site would require land assembly or a more piecemeal approach, which is what has taken place so far. However, there is considered a realistic prospect of development of all or a large part of the site taking place in the plan period.

Are there any main modifications required to the allocation for soundness?

A4.34 No.

CA1f: Rear of 1 & 3 Woodcote Road and 21 St Peter's Hill

What is the background to the site allocation? How was it identified and which options were considered?

A4.35 The site consists of rear gardens adjoining Symeon Place. It was nominated by a developer through the call for sites exercise in preparing the Local Plan in September 2015.

A4.36 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential development (8-12 dwellings)
- Higher density residential (over 20 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

A4.37 Given the rear garden nature of the site, the only potential suitable use would be for residential. In the 2017 HELAA a suburban density of 46 dph was applied to the site to give an initial capacity of 15 dwellings. In the suitability analysis stage, an area close to the rear of 3 Woodcote Road was removed as well as the landscaped fringes of the site, and a density of 41 dph was applied to the remainder to reflect the density of the rest of Symeon Place. The adjusted capacity was 10 dwellings and a 20% margin on either side meant a range of 8-12.

A4.38 In the 2024 HELAA (site ref CH001) a suburban density of 43 dph was used to arrive at an initial capacity of 14 dwellings. At suitability stage there was a slight adjustment made to the site area to account for back to back distances but this had no impact on the capacity of the site. Applying 20% flexibility in each direction meant a range of 11-17 dwellings.

What is the site's status in terms of permissions or completions?

A4.39 There are no planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A4.40 There are no particular infrastructure requirements and unusual costs.

A4.41 The identified constraints relate to those in the policy criteria, notably the need to ensure access from Symeon Place rather than a new access, retention of landscaping and important trees around the site, archaeological potential, air quality and back to back separation. These would all be capable of being addressed at application stage, with back to back separation already considered in setting the capacity.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A4.42 The site has not to our knowledge been assembled as a single landholding and remains owned by individual homeowners. Bringing forward the site would require

land assembly. However, there are only three gardens involved and there is considered a realistic prospect of development of all or a large part of the site taking place in the plan period.

Are there any main modifications required to the allocation for soundness?

A4.43 No.

CA1h: Hemdean House School, Hemdean Road

What is the background to the site allocation? How was it identified and which options were considered?

A4.44 Hemdean House School is the site of a former independent primary school which closed at the end of the 2023-24 school year. It was included as a potential site within the HELAA when announcements were first made in April 2024 about its closure on the expectation that an alternative use may need to be found.

A4.45 The options identified and which were subject to sustainability appraisal were as follows:

- Conversion and development for residential use.
- Do not allocate
- Retain community use and development of additional residential use

What is the basis for the scale, type, and use proposed? Is it justified?

A4.46 It is understood that the preference of the owners is for the site to continue to be in education use, and this would generally be supported by the policy as it would not result in a change and would continue to provide a community use to the people of Caversham. However, if an alternative use needed to be found it would likely be residential in line with surrounding sites. It was therefore considered for a residential use in line with its surroundings. In the 2024 HELAA, the site (ref CA007) was initially calculated as being capable of accommodating 40 dwellings using a suburban density of 43 dph. However, this was reassessed at suitability stage, where the importance of retention of two of the existing buildings was identified (which were assumed to be converted rather than redeveloped) as well as the need to keep development out of the area covered by protected trees and other important trees and retain appropriate back to back distances with neighbouring properties. This reduced the residential capacity to 28 dwellings, and a range of 22-34 when 20% on either side is applied for flexibility.

What is the site's status in terms of permissions or completions?

A4.47 There are no planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A4.48 The draft policy includes reference to contributing to enhanced bus priority on Vastern Road. This was a measure that was identified in the Sustainable Connectivity and Vehicle Trip Distribution Analysis [EV017], in this case as those buses would be expected to serve Caversham in particular. The level of contribution needed is not specified but this would be a matter for consideration at planning application stage.

A4.49 The identified constraints relate to those in the policy criteria, notably the retention of important buildings, impacts on protected or other important trees and appropriate back to back separation. These were all taken into account in determining the capacity of the site.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A4.50 The site currently houses some temporary uses but its main use has ceased. It is understood that the preference of the owners is for the site to continue to be in education use. For this reason the policy supports a continuation of the use and residential is included as an alternative. As the site is currently closed, delivery of one of the uses specified in policy in the medium term is considered realistic and the owner confirmed current availability of the site for education or residential through the HELAA process in 2024. The housing delivery figures in H1, the housing trajectory and HELAA assume no housing delivery on this site,

Are there any main modifications required to the allocation for soundness?

A4.51 Yes. The main house and lodge buildings were added to the Local List in April 2025, and this should be identified in the policy criteria as is the case for other locally listed buildings. See Appendix 7.

Appendix 5: East Reading site information for questions 10.55 to 10.60

ER1b: Dingley House, 3-5 Craven Road

What is the background to the site allocation? How was it identified and which options were considered?

- A5.1 At the time the site was identified it contained healthcare uses utilising two linked Victorian buildings and some temporary buildings. 3 Craven Road has been locally-listed since 2015. The temporary buildings have now been removed and the site is in use as a nursery. It was identified through the 2017 HELAA process as it was subject to an undetermined planning application for retirement living at the time, and was identified as being suitable for inclusion in the now adopted Local Plan.
- A5.2 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Change of use to residential (15-22 dwellings) with limited additional development
 - Redevelopment for residential
 - Development for offices
 - Development for community use

What is the basis for the scale, type, and use proposed? Is it justified?

- A5.3 At the time of the Local Plan, the interest was for a residential use, and it remains a potentially suitable site for residential development, in line with some of the surrounding uses. In the 2017 HELAA, the site was originally assessed for a conversion to residential only (including any temporary floorspace as a proxy), which resulted in a capacity of 21 dwellings. This was reduced to 18 dwellings at suitability stage when the approach was adapted to identify only conversion of the existing buildings (7 dwellings total) and a sensitive 2-storey development on adjoining land delivering a further 11 dwellings. When 20% flexibility margins on either side were applied this resulted in a range of 15-22.
- A5.4 In the 2024 HELAA (site ref RE002), the initial approach was to assume a residential redevelopment at an urban density of 112 dph, which would result in 37 dwellings. However, at suitability stage the need to retain and convert the Victorian buildings was identified, and the assumption was therefore a conversion with additional development on surrounding land of 0.19 at an urban density of 112 dph. This resulted in a capacity of 38 dwellings and a range with 20% flexibility margins of 30-46.

What is the site's status in terms of permissions or completions?

- A5.5 There are no planning permissions relating to the site. There was a previous planning application (16/0355) for 39 retirement living dwellings, which was withdrawn in 2016 after the committee report which recommended refusal was published, for a variety of reasons including the loss of the existing locally-listed building.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A5.6 There are no particular infrastructure requirements.
- A5.7 The most significant constraint here is the existing locally-listed building. As set out above, its retention and conversion has been factored into the development capacity for the site.
- A5.8 The other identified constraints relate to those in the policy criteria, notably the need to reflect building setback, which primarily relates to Craven Road where retention of the Victorian buildings would achieve the setback in any case. There is less of an established building line on the Erleigh Road frontage. The other important constraint is the need to avoid impacts on important trees, which broadly lie outside the likely area for new development.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A5.9 Since the most recent application on the site (an application for prior approval for demolition in 2017) there has been little information on availability. The previous healthcare use for the site has ceased and a new use as a nursery commenced. As such it is not immediately available, but given its history and the overall uncertainties around the hospital site on the other side of Craven Road (the association with the hospital is no longer direct, but it is highly likely that the nursery use is in part supported by hospital workers) it is considered to have a good prospect of being brought forward in the plan period. It is considered that this is now more likely in the long-term, and a main modification is proposed (see below).

Are there any main modifications required to the allocation for soundness?

- A5.10 Yes. It is proposed that Figure 10.1 should be amended to reflect that this site is more likely to come forward in the long term (after 2033) given its association with the hospital and recent announcements about the timescale of a new hospital.

ER1c: Land rear of 8-26 Redlands Road

What is the background to the site allocation? How was it identified and which options were considered?

- A5.11 The site comprises some existing student accommodation at 8 Redlands Road (Martindale Court) and rear gardens. It was nominated for inclusion by the University of Reading, the owners of much of the land, through the call for sites process in preparing the now-adopted Local Plan in September 2015 and subsequently included in the Local Plan.
- A5.12 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Residential development (12-18 dwellings)
 - Higher density residential development (over 30 dwellings)
 - Redevelop the entire site for residential

What is the basis for the scale, type, and use proposed? Is it justified?

- A5.13 This is an established residential location, featuring rear gardens, and the appropriate use is therefore residential. In the 2017 version of the HELAA it was originally considered for development at urban density of 81 dph resulting in a capacity of 60 dwellings in total (55 net gain when an equivalent of the existing student accommodation is discounted). However, at suitability stage there were significant changes made. Given the location within the conservation area, it was considered more appropriate to use the same density as its surroundings (33 dph) and there was also a need to retain a significant amount of the site ensure that the mature trees that provide a setting to the conservation area are retained. This resulted in a much lower capacity of 15 dwellings total (10 net gain) and a range of 12-20.
- A5.14 A similar process was followed in the 2024 HELAA (site ref RE003) with the initial capacity analysis using an increased urban density of 112 dph leading to an initial capacity of 83 dwellings (78 net gain). However, at suitability stage this was again substantially reassessed, and development of the area of the site least affected by tree cover (0.51 ha) at suburban densities of 43 dph to reflect the character of this part of the conservation area was assumed, resulting in a capacity of 22 dwellings (17 net gain). 20% flexibility margins were applied to the 17 dwelling figure to result in a range of 14-20 dwellings. However, for clarity it is considered that there would need to be a main modification to differentiate between total and net gain figures (see below).

What is the site's status in terms of permissions or completions?

- A5.15 There are no planning permission relating to this site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A5.16 There are no particular infrastructure requirements and unusual costs, although access would need to be created, likely from Morgan Road.

A5.17 The identified constraints relate to those in the policy criteria. Most significantly this is the location of the site within the Kendrick Road Conservation Area and the substantial coverage of parts of the site by mature trees that contribute to the character of the area, as well as a wall along Morgan Road that also makes a contribution. This has had a significant impact that has been taken into account in the development capacity. There is also archaeological potential on the site that can be considered at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A5.18 Most of the site is owned by the University of Reading, who have confirmed through the HELAA process that their ownership is likely to become available in the 2024-29 period, although it would require the inclusion of 18 Redlands Road which is not owned by the UoR. The UoR's Regulation 19 response continues to support the allocation. Delivery in the medium term is therefore considered realistic.

Are there any main modifications required to the allocation for soundness?

A5.19 Yes. It should be clarified that the 14-20 range is for the net gain and the total capacity would be for 18-26 dwellings. See Appendix 7.

ER1d: Land adjacent to 40 Redlands Road

What is the background to the site allocation? How was it identified and which options were considered?

- A5.20 The site consists of a community hall and car parking. It was initially suggested for development by the landowner in preparation of the Sites and Detailed Policies Document in 2008, and was included as an allocation in the final version of that document when it was adopted in October 2012. It was then carried across to the now-adopted Local Plan with the addition of some adjacent garden land that had been identified as a potential extension in an updated call for sites submission in 2014.
- A5.21 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Residential development (23-35 dwellings)
 - Less dense residential (15-22 dwellings)
 - Develop for community use

What is the basis for the scale, type, and use proposed? Is it justified?

- A5.22 Other than the existing community use of this site, the surrounding area is almost entirely residential, and this site is therefore appropriate for residential. In the 2017 HELAA, the site was initially considered using an urban density of 81 dwellings resulting in a capacity of 35 dwellings. However, at suitability stage this was reduced to remove the garden of 40 Redlands Road to prevent overlooking issues, resulting in a reduced capacity of 29 dwellings and a range, after application of 20% flexibility margins, of 23-35 dwellings.
- A5.23 In the 2024 HELAA, the site (ref RE004) was again initially assessed using urban density, which had increased to 112 dph, meaning a basic capacity of 48 dwellings. However, this was adjusted heavily at suitability stage, to remove a 10m strip on frontage for inclusion of a green link and removal of an area protected by TPO. In addition, it was considered necessary to reflect that Allcroft Road is a more suburban than urban character, and it was therefore assumed that the 50% of site fronting Redlands Road would be developed at urban density and remaining 50% to be developed at suburban density. This resulted in an adjusted capacity of 31 dwellings, and a range of 25-37 using 20% flexibility on either side.

What is the site's status in terms of permissions or completions?

- A5.24 There are no planning permissions relating to this site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A5.25 There are no particular infrastructure requirements and unusual costs.
- A5.26 The identified constraints relate to those in the policy criteria, notably protected trees, the location adjacent to the Kendrick Road conservation area, potential archaeology,

the need for appropriate back to back separation and the potential that there are bats present in the existing building. Many of these matters are taken into account in setting the development capacity for the site, whilst others will need to be considered at application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- A5.27 The site has now been divided into two. The community hall itself is understood to still be in use. The majority of the land, including the areas formerly making up parts of rear gardens that were added to the allocation in the Local Plan, are used for car parking for the hospital. As such, the site is not currently available. However, given the past interest in development and the uncertainties around the hospital, there is considered a realistic likelihood of the site becoming available in the plan period, although this is now more likely to be in the long term.

Are there any main modifications required to the allocation for soundness?

- A5.28 Yes. It is proposed that Figure 10.1 should be amended to reflect that this site is more likely to come forward in the long term (after 2033) given its association with the hospital and recent announcements about the timescale of a new hospital.

ER1e: St Patrick's Hall, Northcourt Avenue

What is the background to the site allocation? How was it identified and which options were considered?

- A5.29 The site is part of an existing student accommodation complex owned by the UoR. The site was identified in the 2017 HELAA as it had been subject to a refused application for redevelopment and extension for student accommodation (16/1182), and was subsequently included in the now-adopted Local Plan.
- A5.30 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:
- Do not allocate
 - Intensify student accommodation while retaining locally listed building
 - Intensify student accommodation with loss of St Patricks Hall

What is the basis for the scale, type, and use proposed? Is it justified?

- A5.31 As this is an existing student accommodation premises and a need has been identified for additional student accommodation associated with the University it is considered appropriate for this use to be extended in line with policy H12. In the 2017 HELAA, the development capacity was based on an analysis of the refused planning application that was dismissed at appeal. The main issue with that application relevant to overall capacity was that it would have resulted in the loss of the locally-listed St Patrick's Hall. Therefore, the remainder of the proposed development which was considered broadly suitable was taken as the basis for the suitable development, which would have resulted in a net gain of 475 bedspaces. A more limited range of 450-500 bedspaces was used as this matter had been considered in some depth through the development management process. An identical process was used in the 2024 HELAA (site ref RE005).

What is the site's status in terms of permissions or completions?

- A5.32 There are no planning permissions relating to the site. There was a previous refused application for redevelopment for student accommodation.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- A5.33 There are no particular infrastructure requirements. Retention and refurbishment of the locally listed Pearsons Court would represent a cost, but this is not considered to be of a scale that would prevent development coming forward.
- A5.34 The identified constraints relate to those in the policy criteria, notably impacts on the locally listed building, archaeological potential, impacts on protected trees, biodiversity interest, the need for a green link and impact on water and wastewater infrastructure. Many of these issues were considered in depth as part of the previous application, and have therefore been factored into the development capacity by use of figures from that application. Water and wastewater infrastructure would need to be subject to discussion with Thames Water and may require additional lead-in time if upgrades are not delivered in a timely manner.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A5.35 The UoR has confirmed that the site is already available for development. Further plans are not known at this stage, but the UoR's Regulation 19 response continues to support inclusion of this allocation. As such, there is considered to be potential for this development to be delivered in the medium term, but this will be dependent on funding being identified.

Are there any main modifications required to the allocation for soundness?

A5.36 No.

ER1i: 261-275 London Road

What is the background to the site allocation? How was it identified and which options were considered?

A5.37 The site is made up of a car wash and office and retail building. It was initially included as an allocation in the Sites and Detailed Policies Document (adopted 2012) as at the time it was a derelict site. It was identified by officers rather than being nominated for development.

A5.38 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential development (10-16 dwellings) with district centre uses on the ground floor
- Residential only
- Ground floor district centre uses and upper floors offices
- Office development

What is the basis for the scale, type, and use proposed? Is it justified?

A5.39 The site is within the Cemetery Junction District Centre and would therefore be appropriate for a mixed use development with retail or related uses on the ground floor and residential above. Due to this mixed use approach, in the 2017 HELAA this was factored in by assuming that 50% of the site would form the building footprint and that three storeys would be appropriate given surrounding heights. It was assumed that 50% of the ground floor would be retail or related uses, with the remainder as residential using a figure of 150 sq m resulting in one dwelling. This resulted in a capacity of 13 dwellings and 400 sq m of retail. The range, using 20% flexibility for residential and 10% for the retail was 10-16 dwellings and 360-440 sq m retail.

A5.40 In the 2024 HELAA, this site (ref PA003) was treated similarly, but in this case a 43% footprint to site area ratio was used, and a figure of 120 sq m per dwelling from the resulting floorspace was applied, based on the calculations in the updated HELAA. This resulted in a capacity of 14 dwellings and 344 sq m retail or related uses (255 sq m net gain). However, adjustments were made at suitability stage to allow a 10m buffer to London Road to reflect its identification as a treed corridor and to remove an area where there would have been issues with back to back distances to properties on Regent Street. This reduced the capacity to 12 dwellings and 319 sq m retail (230 sq m net gain). Applying 20% flexibility in either direction and rounding to the nearest ten for figures over 100 results in a range of 10-14 dwellings and 250-380 sq m retail.

What is the site's status in terms of permissions or completions?

A5.41 There are no planning permissions relating to this site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A5.42 The main potential infrastructure requirement is the potential need for improvements to the junction of Cholmeley Road and London Road. This would need to be assessed in detail at application stage and improvements secured through Section 106 agreement if necessary.

A5.43 The identified constraints relate to those in the policy criteria, notably the need for access to be taken from Cholmeley Road, to enhance the setting of the registered Reading Cemetery across London Road, archaeological potential, the identification of London Road as a treed corridor in the Tree Strategy, potential contamination, noise, air quality and back to back separation to existing residential properties. These either impact the development capacity and were taken into account when assessing capacity, or would be addressed at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A5.44 The site is currently in use and the Council does not have information that it is available. However, it is an under-use of the available land in a district centre and it is considered there is a reasonable prospect of it coming forward in the plan period. As such it has been identified for delivery in the long term.

Are there any main modifications required to the allocation for soundness?

A5.45 No.

ER1k: 131 Wokingham Road

What is the background to the site allocation? How was it identified and which options were considered?

A5.46 The site is made up of a vehicle hire business with forecourt parking and car wash. It was identified as part of the 2017 HELAA due to being the site of a refused application (08/0635) for retail and residential development, and was considered suitable for inclusion as an allocation in the now-adopted Local Plan.

A5.47 The options identified at the time of preparing the Local Plan and which were subject to sustainability appraisal were as follows:

- Do not allocate
- Residential development
- Office development
- Ground floor local centre uses and residential on upper floors
- Ground floor local centre uses and offices on upper floors

What is the basis for the scale, type, and use proposed? Is it justified?

A5.48 The site is within the Wokingham Road Major Local Centre and would therefore be appropriate for a mixed use development with retail or related uses on the ground floor and residential above. Due to this mixed use approach, in the 2017 HELAA this was factored in by assuming that 33% of the site would form the building footprint and that three storeys would be appropriate given surrounding heights. It was assumed that the ground floor would be retail or related uses, with the remainder as residential using a figure of 100 sq m resulting in one dwelling as for other non-town centre sites. This resulted in a capacity of 10 dwellings and 450 sq m of retail. The range, using 20% flexibility for residential and 10% for the retail was 8-12 dwellings and 400-500 sq m retail.

A5.49 In the 2024 HELAA, this site (ref PA004) was treated similarly, but in this case a 64% footprint to site area ratio was used, and a figure of 120 sq m per dwelling from the resulting floorspace was applied, based on the calculations in the updated HELAA. In addition it was assumed that only 50% of the ground floor would be retail, due to anticipated lesser demand for retail expansion. This resulted in a capacity of 20 dwellings and 480 sq m retail or related uses. However, adjustments were made at suitability stage to allow a 10m buffer to Wokingham Road to reflect its identification as a treed corridor and remove areas where protected trees would be affected. This reduced the capacity to 12 dwellings and 295 sq m retail. Applying 20% flexibility in either direction and rounding to the nearest ten for figures over 100 results in a range of 10-14 dwellings and 240-350 sq m retail.

What is the site's status in terms of permissions or completions?

A5.50 There are no planning permissions relating to this site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A5.51 There are no particular infrastructure requirements and unusual costs.

A5.52 The identified constraints relate to those in the policy criteria, notably impacts on protected trees, the identification of Wokingham Road as a treed corridor in the Tree Strategy, potential contamination, noise and air quality. Those matters relating to trees were accounted for in setting the capacity of the site, whilst the others would be addressed at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A5.53 The site is currently in use and the Council does not have information that it is available. However, it is an under-use of the available land in a major local centre and it is considered there is a reasonable prospect of it coming forward in the plan period. As such it has been identified for delivery in the long term.

Are there any main modifications required to the allocation for soundness?

A5.54 No.

ER11: Princes House, 73A London Road

What is the background to the site allocation? How was it identified and which options were considered?

A5.55 The site is an office building occupied by the NHS and associated with the Royal Berkshire Hospital opposite. It was identified as it had a lapsed prior approval for conversion to residential. The NHS promoted its inclusion as an allocation in the now-adopted Local Plan, but it was not included as it was not considered necessary due to already having approval for conversion at the time.

A5.56 The options identified and which were subject to sustainability appraisal were as follows:

- Conversion to residential use
- Do not allocate
- Redevelopment for residential use at higher density

What is the basis for the scale, type, and use proposed? Is it justified?

A5.57 As this site is well away from the main concentration of office uses, it was considered in terms of its potential for residential. In the 2024 HELAA (site ref RE017), the figure from the lapsed prior approval (26 dwellings) was used, and this would result in a higher figure than a redevelopment at urban density (18 dwellings). Applying a 20% flexibility margin in either direction gives a range of 21-31

What is the site's status in terms of permissions or completions?

A5.58 The site is not covered by any current permissions. Prior approval 15/0685 for conversion to 26 dwellings expired in June 2018.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A5.59 There are no particular infrastructure requirements and unusual costs.

A5.60 The identified constraints relate to those in the policy criteria, notably trees protected by TPO and the need for new tree planting, noise and air quality. These should all be capable of being addressed at planning application stage.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A5.61 The building is in use and not currently available. Its use is however heavily tied to the future of the Royal Berkshire Hospital, and office demand for other users is likely to be limited. Given the uncertainty of the future of the hospital and plans that could include on-site redevelopment or a move to another site towards the end of the plan period, it is considered realistic that this site could come forward during the plan period albeit towards the end.

Are there any main modifications required to the allocation for soundness?

A5.62 Yes. It is proposed that Figure 10.1 should be amended to reflect that this site is more likely to come forward in the long term (after 2033) given its association with the hospital and recent announcements about the timescale of a new hospital.

ER1m: Land adjacent to 17 Craven Road

What is the background to the site allocation? How was it identified and which options were considered?

A5.63 The site is an area of largely cleared land on Craven Road, part of which contains temporary buildings containing hospital uses. The site was initially identified because it was the subject of a planning application for a medical centre (16/0256) that was withdrawn in November 2016.

A2.64 The options identified and which were subject to sustainability appraisal were as follows:

- Residential development (22-34 dwellings)
- Do not allocate
- Residential development at a higher density

What is the basis for the scale, type, and use proposed? Is it justified?

A5.65 The site is currently in a use associated with the hospital but in temporary buildings that does not make use of all of the land. The area around the hospital is mainly otherwise residential, and this site was therefore considered for residential. In the 2024 HELAA (ref RE007) the capacity was calculated using an urban density of 112 dph, giving a total of 30 dwellings. However, the site size was reduced slightly to avoid impacts on a TPO tree, leaving a total of 28 dwellings. Applying 20% flexibility in either direction gives a range of 22-34.

What is the site's status in terms of permissions or completions?

A5.66 The site is not covered by any planning permissions.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A5.67 There are no particular infrastructure requirements and unusual costs.

A5.68 The identified constraints relate to those in the policy criteria, notably the presence of important trees, the setting of neighbouring listed buildings and noise impacts on residential use. These would need to be addressed through design. The site is also affected by surface water flooding, which appears to pool on site. The SFRA Level 2 [EV038s] for the site identified that it should be manageable provided it is considered when locating infrastructure, and it seems likely that any development could significantly alter the nature of the surface water flood risk though changes to levels.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A5.69 The site is in use and does not appear to currently be available. Its use is however heavily tied to the future of the Royal Berkshire Hospital. Given the uncertainty of the future of the hospital and plans that could include on-site redevelopment or a move to another site towards the end of the plan period, it is considered realistic that this site could come forward during the plan period albeit towards the end.

Are there any main modifications required to the allocation for soundness?

A5.70 Yes. It is proposed that Figure 10.1 should be amended to reflect that this site is more likely to come forward in the long term (after 2033) given its association with the hospital and recent announcements about the timescale of a new hospital.

ER1n: 51 Church Road, Earley

What is the background to the site allocation? How was it identified and which options were considered?

A5.71 The site consists of an existing ageing hotel. It was identified through the 2024 HELAA process that fed into the LPPU as a site where there had been some interest previously expressed in redevelopment, and after identification as a suitable site in the HELAA was included in the LPPU.

A5.72 The options identified and which were subject to sustainability appraisal were as follows:

- Conversion to residential use
- Do not allocate (retain hotel use)
- Redevelopment for residential use (13-19 dwellings)

What is the basis for the scale, type, and use proposed? Is it justified?

A5.73 The site is in a residential area and is appropriate for a residential development. In the 2024 HELAA (site ref PA008) an urban density was initially applied but at suitability analysis stage it was identified that this would be very out of character with surrounding areas and instead the conversion potential of the existing building of 1,032 sq m was used as a proxy, which would result in 16 dwellings. The intention would not necessarily be to convert but it is a proxy for what could be achieved within a similar footprint and height which would avoid impacts on protected trees. Expressed as a range with 20% flexibility margins on either side this is 13-19 dwellings.

What is the site's status in terms of permissions or completions?

A5.74 There are no planning permissions relating to the site.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

A5.75 There are no particular infrastructure requirements and unusual costs.

A5.76 The identified constraints relate to those in the policy criteria, notably protected trees and the setting of the nearby listed church (within Wokingham Borough). These issues would be considered at application stage, but have been taken into account in arriving at the site's development potential by using a scale similar to the existing building as a proxy.

Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

A5.77 The site is in use and is not currently available. However, given that the building is now ageing for its current purpose and that past interest has been expressed in development there is considered a reasonable prospect that the site could come forward within the plan period, most likely as a long term opportunity.

Are there any main modifications required to the allocation for soundness?

A5.78 No.

Appendix 6: Submitted Wokingham Borough Local Plan policy on Whiteknights Campus

Policy SS9: Whiteknights Campus

1. The University of Reading is a national and international educational establishment of strategic importance, which will continue to adapt and expand over the plan period. The Whiteknights Campus as shown on the Policies Map will continue to be a focus for development associated with the University of Reading. Such development may include additional student, staff, teaching, research and enterprise accommodation, infrastructure and services, and sports and leisure facilities, among other uses. Access to and within the site will be improved where necessary.

2. Wokingham Borough Council will continue to work proactively with the University of Reading and Reading Borough Council to support the continued adaptation and development of the Whiteknights Campus as a focus for the University of Reading, to allow the university to continue to fulfil its important role in the economic success of the area.

3. Where development would result in a material need for additional students to be housed, it should be supported by an appropriate increase in existing or planned student accommodation. Provision of new student accommodation on the Whiteknights Campus, or as a reconfiguration or extension of nearby dedicated accommodation, will therefore be acceptable in principle where the need of student accommodation has been established, subject to other policies in the Local Plan Update.

4. Development proposals will accord with the following criteria:

- a) Conserve, and where possible enhance, the historic parkland landscape, heritage assets and their settings;
- b) The open areas and the character of the area are respected;
- c) Areas of wildlife significance (including Local Wildlife Sites) and current or potential green and blue infrastructure networks are retained and enhanced, and will not be detrimentally affected by development, including through light effects;
- d) The safety of those using the campus (including pedestrian and highway safety issues and designing out crime) will be maintained or enhanced;
- e) No significant detrimental impacts on the amenity of neighbouring residential properties from the development, including from noise and parking; and
- f) The loss of undeveloped areas on the site will be weighed against the benefits of development to the wider community.

Appendix 7: 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 A7.1: 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 10 - A	182	5.2.16	<p><i>Amend first sentence and first bullet point of paragraph as follows:</i></p> <p>It is expected that between 2013-2023 and 2036-2041 Central Reading will accommodate approximately:</p> <ul style="list-style-type: none"> • 7,6008,700 homes to 2036-2041 (around 4959% of the total planned for – this includes 1,2847491,195 homes already completed between 2013 and 2017during between 2023- and 242025); 	To update the figures to ensure that the plan is effective.	Paragraph 10.1.5
Matter 10 - B	185	5.3.10	<p><i>Amend fifth sentence of paragraph as follows:</i></p> <p>In addition, the use of green and brown roofs or green walls will enhance the biodiversity value of developments in the centre, and other measures such as swift boxes <u>bricks</u> may be appropriate to the town centre.</p>	To address comments to ensure that the plan is effective.	Paragraph 10.2.7
Matter 10 - C	196	CR10	<p><i>Amend sixth bullet point under criterion vii) as follows:</i></p> <ul style="list-style-type: none"> • Conserve and, where possible, enhance <u>or better reveal the significance the setting of conservation areas, scheduled monuments and listed buildings</u>; 	To ensure that relevant heritage assets are referred to and better align with the NPPF for consistency with national policy	Paragraph 10.6.11
Matter 10 - D	200	5.3.50	<p><i>Amend paragraph as follows</i></p> <p>Tall buildings that include residential will need to take account of noise and air quality issues in the same way as all additional residential development. All developments will need to comply with the Civil Aviation Authority's aerodrome safeguarding criteria, where buildings should be below 242 metres AOD, <u>and Heathrow Airport is a consultee for any buildings above 150m within Central Reading.</u></p>	To bring up to date with new safeguarding criteria	Paragraph 10.6.13
Matter 10 - E	201	CR11a: Friar Street & Station Road	<p><i>Amend policy as follows:</i></p> <p>Site size: 1.36 ha</p> <p>Indicative potential: 150-270120<u>130-190</u> dwellings, <u>up to 5,000-7,000 sq m hotel</u>, offices, retail and leisure (no significant net gain assumed).</p>	To reflect the HELAA results to ensure that the policy is justified	Paragraph A1.15 (Appendix 1)
Matter 10 - F	201	CR11b: Greyfriars Road Corner	<p><i>Amend policy as follows:</i></p> <p><i>There will be active retail and leisure uses on the ground floor along Friar Street, with a mix of uses on higher floors and in the rest of the area. The edge of the site nearest to the areas of traditional terracing west of Greyfriars Road <u>and the Grade I listed Greyfriars Church</u> will require careful design treatment. <u>Listed buildings in the area will be conserved, including the contribution to their significance made by their settings.</u></i></p>	To highlight the sensitivity of nearby Grade I listed building for consistency with national policy	Paragraph A1.26 (Appendix 1)
Matter 10 - G	209	CR12a: Cattle Market	<p><i>Amend policy as follows:</i></p>	To ensure that the policy is effective	Paragraph A1.112 (Appendix 1)

Modification Number	Page number [LP003b]	Policy/Paragraph [LP003b]	Main Modification	Reason for Main Modification (linked to soundness requirements)	Reference in this statement
			<p>Site size: 2.46 ha</p> <p>Indicative potential: 330-490560-840 dwellings, 10,000-15,000 sq m net gain of retail, primary healthcare, retained market uses if required.</p>		
Matter 10 - H	210	CR12d: Broad Street Mall	<p>Amend policy as follows:</p> <p>Site size: 2.75 ha</p> <p>Indicative potential: 280-420420-600650-850 dwellings (relating to the whole site, not solely the Mall), retail and leisure (no significant net gain assumed), potential for hotel.</p>	To amend dwelling ranges to reflect recent development management decisions, correct errors and ensure that it is clear what the figures relate to, to ensure the plan is justified and effective.	Paragraph A1.155 - A1.156 (Appendix 1)
Matter 10 - I	215	CR13	<p>Amend criterion v) of policy as follows:</p> <p>v) Conserve and enhance the <u>significance of the listed buildings in the area, Reading Abbey sScheduled mMonument and Forbury Gardenshistoric garden in the area (including the contribution to their significance made by and their settings)</u> where possible;</p>	To amend references to heritage assets for consistency with national policy	Paragraph 10.10.6
Matter 10 - J	216	CR13a: Reading Prison	<p>Amend text on indicative potential as follows:</p> <p>Indicative potential: conversion of prison could result in 65-90 dwellings. No figures for additional development, as highly dependent on assessment of archaeology approximately 10,000 sq m of mixed uses (as a result of conversion of the existing building) including cultural, leisure or heritage uses</p>	To clarify that the floorspace reference is to the existing building	Paragraph A1.182 (Appendix 1)
Matter 10 - K	218	5.4.28	<p>Amend fifth to sixth sentences of paragraph as follows:</p> <p>Reading Prison is a highly constrained site, and the Framework contains much more detailed information on these issues and how they should be addressed. It is important that options for uses that may secure the future of the listed prison building are kept open at this stage, which is why student accommodation remains under consideration in a site that would otherwise be contrary to policy H12 but a cultural, heritage or leisure use that is in accordance with the historic importance of this building should be the focus informed by proportionate heritage impact assessment.</p>	To add the need for heritage impact assessment for Reading Prison for consistency with national policy	Paragraph A1.182 (Appendix 1)
Matter 10 - L	223	CR14d: 173-175 Friar Street and 27-32 Market Place	<p>Amend first bullet point of policy as follows:</p> <p>• Avoid <u>or minimise harm to detrimental effects on the significance of the listed buildings within and near the site and the Conservation Area (including the contribution to their significance made by and their settings)</u>;</p>	To consider listed buildings both within and nearby and align language with the NPPF for consistency with national policy	Paragraph A1.235 (Appendix 1)
Matter 10 - M	224	CR14g: The Oracle Riverside East	<p>Amend policy as follows:</p> <p>Development of the area between the River Kennet and Mill Lane for retail, with use of site at Letcombe Street for public car parkeastern end of the Oracle Riverside for residential development with commercial development</p>	To provide appropriate flexibility to ensure the policy is effective, in response to a representation from The Oracle	Paragraph A1.247 (Appendix 1)

Modification Number	Page number [LP003b]	Policy/Paragraph [LP003b]	Main Modification	Reason for Main Modification (linked to soundness requirements)	Reference in this statement
			<u>including retail and/or leisure or appropriate footfall generating town centre uses at the ground floor.</u>		
Matter 10 - N	224	CR14g: The Oracle Riverside East	Amend third bullet point of policy as follows: <ul style="list-style-type: none"> <u>• Avoid or minimise harm to detrimental effects on the significance of listed buildings and the Conservation Area (including the contribution to their significance made by and their settings); Enhance the setting of the Conservation Area;</u> 	To align language with the NPPF for consistency with national policy	Paragraph A1.246 (Appendix 1)
Matter 10 - O	224	CR14g: The Oracle Riverside East	Amend policy as follows: Site size: 1.6726 ha <u>1,600–2,000 sq m of retail or town centre uses 250-370 dwellings, retention of retail and/or leisure or footfall generating town centre uses on key frontages on ground floor</u>	To provide appropriate flexibility to ensure the policy is effective, in response to a representation from The Oracle	Paragraph A1.247 (Appendix 1)
Matter 10 - P	225	CR14i: Enterprise House, 89-97 London Street	Amend first bullet point of policy as follows: <ul style="list-style-type: none"> <u>• Avoid or minimise harm to detrimental effects on the significance of listed buildings within and near the site and the Conservation Area (including the contribution to their significance made by and their settings);</u> 	To align language with the NPPF for consistency with national policy	Paragraph A1.263 (Appendix 1)
Matter 10 - Q	226	CR14l: 187-189 Kings Road	Amend first bullet point of policy as follows: <ul style="list-style-type: none"> <u>• Avoid or minimise harm to detrimental effects on the significance of the listed building and the Conservation Area (including the contribution to their significance made by their settings);</u> 	To align language with the NPPF for consistency with national policy	Paragraph A1.279 (Appendix 1)
Matter 10 - R	226	CR14n: Reading Central Library, Abbey Square	Amend policy as follows: <u>Development for residential, with design appropriate to the historic significance of the site, subject to provision of a new central library at the Civic Offices.</u> <u>Development should:</u> <ul style="list-style-type: none"> <u>• Be informed by heritage impact assessment;</u> <u>• Take measures to avoid or minimise harm to prevent any detrimental impact on the scheduled ancient monument by ensuring sensitive scheme design that is informed by archaeological desk-based assessment, followed by adequate archaeological investigation where necessary;</u> <u>• Deliver heritage benefits, which better reveal heritage significance and foster greater connectivity between this site and the other Scheduled remains of Reading Abbey</u> <u>• Avoid or minimise harm to detrimental effects on the setting of the Conservation Area;</u> 	To align language with the NPPF and highlight the historic significance of the site for consistency with national policy	Paragraph A1.296 (Appendix 1)

Modification Number	Page number [LP003b]	Policy/Paragraph [LP003b]	Main Modification	Reason for Main Modification (linked to soundness requirements)	Reference in this statement
			<ul style="list-style-type: none"> • <u>Avoid development in Flood Zone 3 and consider opportunities to enhance the biodiversity potential of the Holy Brook including through deculverting;</u> • <u>Address noise impacts on residential use;</u> • <u>Address air quality impacts on residential use; and</u> • <u>Address any contamination on site.</u> <p><u>Site size: 0.1 ha</u></p> <p><u>22-32 dwellings</u></p>		
Matter 10 - S	227	CR14r: John Lewis Depot, Mill Lane	<p>Amend first bullet point of policy as follows:</p> <ul style="list-style-type: none"> • <u>Avoid or minimise harm to detrimental effects on the significance of listed buildings and the Conservation Area (including the contribution to their significance made by and their settings);</u> 	To align language with the NPPF for consistency with national policy	Paragraph A1.327 (Appendix 1)
Matter 10 - T	227	CR14r: John Lewis Depot, Mill Lane	<p>Amend policy as follows:</p> <p><u>Site size: 0.37 ha</u></p> <p><u>76-110170 dwellings</u></p>	To reflect resolution to grant permission subject to S106, to ensure the policy is justified	Paragraph A1.328 (Appendix 1)
Matter 10 - U	228	CR14s: 20-22 Duke Street	<p>Amend second and third bullet points of policy as follows:</p> <ul style="list-style-type: none"> • <u>Take measures to prevent any impact on the scheduled ancient monument;</u> • <u>Avoid or minimise harm to detrimental effects on the significance setting of listed buildings and the Conservation Area (including the contribution to their significance made by their settings);</u> <p>Add additional bullet point beneath as follows:</p> <ul style="list-style-type: none"> • <u>Address flood risk issues;</u> 	To align language with the NPPF and to identify flood risk issues in order to be effective and for consistency with national policy	Paragraphs A1.336 – A1.337 (Appendix 1)
Matter 10 - V	228	CR14t: Aquis House, 49-51 Forbury Road	<p>Amend second bullet point of policy as follows:</p> <ul style="list-style-type: none"> • <u>Avoid or minimise harm to detrimental effects on the significance setting of listed buildings and the Conservation Area (including the contribution to their significance made by their settings);</u> 	To align language with the NPPF for consistency with national policy	Paragraph A1.347 (Appendix 1)
Matter 10 - W	229	CR14u: 33 Blagrove Street	<p>Amend first bullet point of policy as follows:</p> <ul style="list-style-type: none"> • <u>Contribute positively to the character and distinctiveness of Enhance the Conservation Area where possible and avoid or minimise harm to the significance of the Grade II* listed Reading Town Hall;</u> 	To emphasise the need for contributing to character of conservation area for consistency with national policy	Paragraph A1.355 (Appendix 1)
Matter 10 - X	231-232	CR14aa: Part of Reading College, Kings Road	<p>Insert additional bullet point into policy as follows:</p> <ul style="list-style-type: none"> • <u>Ensure appropriate back-to-back separation from existing residential;</u> 	To reflect a constraint identified by the Environment Agency at Regulation 19 stage to be effective	Paragraph A1.406 (Appendix 1)

Modification Number	Page number [LP003b]	Policy/Paragraph [LP003b]	Main Modification	Reason for Main Modification (linked to soundness requirements)	Reference in this statement
			<ul style="list-style-type: none"> • Investigate impacts on the Superficial Secondary A aquifer and Bedrock Principal aquifer through a desk-based study at a minimum; • Address air quality impacts on residential use; and 		
Matter 10 - Y	232	CR14ab: 160-63 Friar Street	<p>Add new bullet point before existing first bullet point as follows:</p> <ul style="list-style-type: none"> • Avoid or minimise harm to the significance of listed buildings and the Conservation Area (including the contribution to their significance made by their settings); • Address air quality impacts on residential use; and 	To reflect the surrounding heritage assets for consistency with national policy	Paragraph A1.414 (Appendix 1)
Matter 10 - Z	236	CR15	<p>Amend final paragraph of policy as follows:</p> <p><i>The Abbey Quarter should be considered in the context of the adjacent historic Reading Prison site identified in policy CR13, which represents an opportunity to further consolidate the cluster of heritage interest and cultural setting of The Abbey Quarter. The areas should link into and complement one another, providing public access via the linkages where possible, while avoiding or minimising harm to heritage significance. Proposals should deliver heritage benefits.</i></p>	To emphasise the importance of avoiding harm and delivering heritage benefits for consistency with national policy	Paragraph 10.12.4
Matter 10 - AA	236	5.4.39	<p>Amend paragraph as follows:</p> <p>The Abbey is Reading's most significant heritage asset. This historic site is particularly evocative with layers of history including the burial place of King Henry I, the civil war defences of Forbury Hill, the Abbey Gate where Jane Austen attended school, the Victorian Maiwand Lion and Reading Gaol where Oscar Wilde was imprisoned¹⁵⁵. The Abbey Ruins and Forbury Gardens area provides a significant opportunity to create a new heritage and leisure quarter including Reading Museum at the Town Hall. This will be accomplished with recently secured Heritage Lottery Funding and matching funds intended to re-open the Abbey to the public and to repair and interpret the site. Proposals in this area, in particular affecting the site of the scheduled monument, should be informed by early engagement with Historic England. In 2018, the Abbey ruins will fully re-opened to the public following repairs. More information on the project, including an overall map of the area, is available at www.readingabbeyquarter.org.uk.</p>	To emphasise importance of pursuing early engagement with Historic England for effectiveness	Paragraph 10.12.4
Matter 10 - AB	239	6.2.1	<p>Add additional key principle as follows:</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 relevant policies.</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 10.19.6
Matter 10 - AC	241	6.2.4	<p>Amend first sentence of paragraph as follows:</p> <p>It is considered that South Reading can accommodate around 3,7002,700 homes between 2013-2023 and 20362041, around 2418% of the total planned for (this includes 479-185481 homes completed between 2013 and 2017during between 2023 and 242025).</p>	To update the figures to ensure that the plan is effective.	Paragraph 10.19.7

Modification Number	Page number [LP003b]	Policy/Paragraph [LP003b]	Main Modification	Reason for Main Modification (linked to soundness requirements)	Reference in this statement
Matter 10 - AD	253	SR4b: Rear of 3-29 Newcastle Road	Amend policy as follows: Site size: 0.47 ha 18-27 14-22 dwellings <u>net gain</u>	For clarity to ensure that the policy is effective	Paragraph A2.68 (Appendix 2)
Matter 10 - AE	256	SR4h: 11 Basingstoke Road	Amend first bullet point of policy as follows: <u>• Be accessed primarily from Christchurch Gardens;</u>	To ensure that the plan is effective by not ruling out an alternative arrangement if it can be justified.	Paragraph A2.116 (Appendix 2)
Matter 10 - AF	256	SR4i: 85-87 Basingstoke Road	Amend policy as follows: <u>Site size: 0.06 ha</u> 12-15 18 dwellings	To correct an error and ensure that the plan is justified	Paragraph A2.124 (Appendix 2)
Matter 10 - AG	265	7.2.4	Amend first sentence of paragraph as follows: It is considered that West Reading and Tilehurst can accommodate around 2,400 1,900 homes between 2013-2023 and 2036 2041 , around 15 13 % of the total planned for (this includes 554-45 80 dwellings that were completed between 2013-2023 and 2017 2041-2025).	To update the figures to ensure that the plan is effective.	Paragraph 10.30.3
Matter 10 - AH	278	WR3s: Land at Kentwood Hill	Amend tenth bullet point of policy as follows: <u>• Ensure that development will not have a avoid or mitigate any detrimental effect on land stability on the site and nearby; and</u>	To ensure that the policy is consistent with national policy and in response to a representation from Tilehurst People's Local Charity	Paragraph A3.114 (Appendix 3)
Matter 10 - AI	279	WR3t: Land at Armour Hill	Amend ninth bullet point of policy as follows: <u>• Ensure that development will not have a avoid or mitigate any detrimental effect on land stability on the site and nearby; and</u>	To ensure that the policy is consistent with national policy and in response to a representation from Tilehurst People's Local Charity	Paragraph A3.125 (Appendix 3)
Matter 10 - AJ	279	WR3u: 132-134 Bath Road	Add additional bullet point of policy as follows: <u>• Ensure appropriate back-to-back separation from existing residential; and</u> <u>• Address surface water flood risk issues arising from a Flood Risk Assessment, including from surface water; and</u> <u>• Avoid discharging surface water flows into the public sewer.</u>	To ensure that the plan is justified based on the evidence of flood risk on the site	Paragraph A3.133 (Appendix 3)
Matter 10 - AK	280	WR3w: Part of Tesco Car Park, Portman Road	Amend second bullet point of policy as follows: <u>• Be accessed from the existing car park access or, subject to not having an adverse impact on the operation or safety of the highway, the adjacent service access;</u>	To ensure that the plan is effective by not ruling out an alternative arrangement if it can be justified.	Paragraph A3.150 (Appendix 3)
Matter 10 - AL	280-281	WR3y: 72 Berkeley Avenue	Amend policy as follows: <u>Change of use to residential with potential for carefully designed and located additional development.</u>	To ensure that the policy is justified.	Paragraph A3.167 (Appendix 3)

Modification Number	Page number [LP003b]	Policy/Paragraph [LP003b]	Main Modification	Reason for Main Modification (linked to soundness requirements)	Reference in this statement
Matter 10 - AM	285	8.2.3	<p><i>Amend first sentence of paragraph as follows:</i></p> <p>It is considered that Caversham and Emmer Green can accommodate around 700 homes between 2013-2023 and 20362041, around 5% of the total planned for (this includes 65 27-118 homes completed between 2013 and 2017during between 2023- and 242025).</p>	To update the figures to ensure that the plan is effective.	Paragraph 10.41.2
Matter 10 - AN	292	CA1h: Hemdean House School, Hemdean Road	<p><i>Amend the second bullet point as follows:</i></p> <p><u>• Retain those buildings that make the most significant contribution oto the character of the surrounding area including the locally listed school and lodge buildings;</u></p>	To reflect the local listing of the school and lodge and ensure the policy is effective	Paragraph A4.51 (Appendix 4)
Matter 10 - AO	297	9.2.4	<p><i>Amend first sentence of paragraph as follows:</i></p> <p>It is considered that East Reading can accommodate around 1,100800 homes between 2013-2023 and 20362041, around 76% of the total planned for (this includes 132 22-44 homes already completed between 2013 and 2017during between 2023- and 242025).</p>	To update the figures to ensure that the plan is effective.	Paragraph 10.51.2
Matter 10 - AP	301	ER1c: Land rear of 8-26 Redlands Road	<p><i>Amend the policy as follows:</i></p> <p><u>Site size: 0.74 ha</u></p> <p><u>18-26 dwellings (1214-20 dwellings <u>net gain</u>)</u></p>	To clarify what the dwellings refer to to ensure the plan is effective.	Paragraph A5.19 (Appendix 5)
Matter 10 - AQ	308	9.3.10	<p>Amend the paragraph as follows:</p> <p><u>An Estates Strategy for the University is in preparation to cover the period to 2032, which will outline the role that the estate, including the Whiteknights Campus, will help to deliver the four University strategic principles set out in the Strategic Plan of community, excellence, sustainability and engaged university. It is already clear that the University's Net Zero Carbon Plan 2021-2030 entails development within the campus to achieve decarbonisation. In addition, the main focus of the Estates Strategy is expected to be the concept of the 'University within a park', and that there will be a significant emphasis on repurposing and refurbishing existing buildings, as well as creating a campus heat and improving accessibility across the campus. At this stage, there is no indication that the strategy will involve a significant increase in the amount of floorspace on the campus in the short term. The University will continue to keep this under review in order to support and deliver any new buildings or student accommodation should this be required to meet the needs of the University. The University will continue to regularly engage with both the Council and Wokingham Borough Council as it implements the Estate Strategy and any successor strategy which may be prepared in the Local Plan period. In 2008, the University drew up a Whiteknights Campus Development Plan, which set out the University's principles for future development of the site, including providing 1,297 additional bedspaces, waste and catering facilities and changes to the accesses and internal circulation. The Development Plan does not form part of the Council's strategy, but it outlines the changes that are proposed to occur on the site in the coming years, and has informed this policy. Much of the development proposed in that plan has now been built out, but there remains the likelihood of further development over the</u></p>	To reflect the need to keep changes under review to ensure that the plan is sound, in response to a representation by the University of Reading.	Paragraph 10.53.9

Modification Number	Page number [LP003b]	Policy/Paragraph [LP003b]	Main Modification	Reason for Main Modification (linked to soundness requirements)	Reference in this statement
			<p>plan period, including for student accommodation as a result of a growth in student numbers of 28% between 2007/8 and 2016/17, together with any additional growth over the plan period.</p> <p>9.3.11 Proposals within the Whiteknights Development Plan include rationalising the substantial number of vehicle access points around the campus. Given that growth is likely to occur on the campus, it is vital that access points are appropriately located. The Council is therefore supportive of this principle in the Whiteknights Development Plan.</p>		
Matter 10 - AR	315	Figure 10.1	For site CR13a (Reading Prison), remove from the 'Short (2023-2028)' category and place in the 'Medium (2028-2033)' category.	To reflect current progress, to be effective	Paragraph A1.183 (Appendix 1)
Matter 10 - AS	316	Figure 10.1	For site CR14i (Enterprise House, 89-97 London Street), remove from the 'Medium (2028-2033)' category and place in the 'Long (2033-2041)' category.	To reflect lack of information on deliverability, to be effective	Paragraph A1.262 (Appendix 1)
Matter 10 - AT	316	Figure 10.1	For site CR14l (187-189 Kings Road), remove from the 'Medium (2028-2033)' category and place in the 'Long (2033-2041)' category.	To reflect lack of information on deliverability, to be effective	Paragraph A1.278 (Appendix 1)
Matter 10 - AU	317	Figure 10.1	For site CR14x (Part of Tesco Car Park, Napier Road), remove from the 'Long (2033-2041)' category and place in the 'Medium (2028-2033)' category.	To reflect confirmation of deliverability to be effective	Paragraph A1.380 – A1.381 (Appendix 1)
Matter 10 - AV	318	Figure 10.1	For site SR4d (16-18 Bennet Road), remove from the 'Medium (2028-2033)' category and place in the 'Long (2033-2041)' category.	To reflect current progress on delivery to be effective	Paragraph A2.85 (Appendix 2)
Matter 10 - AW	319	Figure 10.1	For site WR3f (4 Berkeley Avenue), remove from the 'Medium (2028-2033)' category and place in the 'Long (2033-2041)' category.	To reflect lack of information on deliverability, to be effective	Paragraph A3.18 (Appendix 3)
Matter 10 - AX	320	Figure 10.1	For site WR3o (The Meadway Centre, Honey End Lane), remove from the 'Short (2023-2028)' category and place in the 'Long (2033-2041)' category. Retain the site in the 'Medium (2028-2033)' category as currently shown.	To reflect the disposal of the planning application and the impact this will have on delivery timetables, to be effective	Paragraph A3.86 (Appendix 3)
Matter 10 - AY	321	Figure 10.1	For site ER1b (Dingley House, 3-5 Craven Road), remove from the 'Medium (2028-2033)' category and place in the 'Long (2033-2041)' category.	To reflect association with the hospital, to be effective.	Paragraph A5.10 (Appendix 5)
Matter 10 - AZ	321	Figure 10.1	For site ER1d (Land adjacent to 40 Redlands Road), remove from the 'Medium (2028-2033)' category and place in the 'Long (2033-2041)' category.	To reflect association with the hospital, to be effective.	Paragraph A5.28 (Appendix 5)
Matter 10 - BA	322	Figure 10.1	For site ER1l (Princes House, 73A London Road), remove from the 'Medium (2028-2033)' category and place in the 'Long (2033-2041)' category.	To reflect association with the hospital, to be effective.	Paragraph A5.62 (Appendix 5)
Matter 10 - BB	322	Figure 10.1	For site ER1m (Land adjacent to 17 Craven Road), remove from the 'Medium (2028-2033)' category and place in the 'Long (2033-2041)' category.	To reflect association with the hospital, to be effective.	Paragraph A5.70 (Appendix 5)

