



Reading Borough Council Local Plan Partial Review Examination

Stage 2 Hearing Statement

Matter 3 – Housing, including Five Year
Supply of Housing Land

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Prepared for:
The University of Reading

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1 Matter 3: Housing, including Five Year Supply of Housing Land

1.1 Issue 1 – Question 3.7

*What are the identified needs for specialist housing, for example housing for older and disabled people and student accommodation, within the overall housing need for Reading?
How will these needs be met?*

- 1.1.1 The University has identified an expected growth of 1,850 additional students by 2030 above the current student population. As such there is a growing need to provide more Purpose Built Student Accommodation (PBSA). By providing a larger quantity of PBSA, the effects are twofold in that it ensures as a minimum all first year students are entitled to a room while preventing the filtering of students into the wider private rental market in Reading.
- 1.1.2 The University agrees with paragraph 4.4.105 that the existing need should mainly be met on campus or through the reconfiguration, refurbishment and extension of existing halls of residence. There is also further scope for the need to be met through new developments on the Whiteknights campus. This is explored in the 'Campus Capacity Study (2018)' which was submitted as part of the hearing statements for the adopted local plan's examination stage. The campus remains largely unchanged since 2018 and so the Study still provides a useful context for potential capacity for future development.
- 1.1.3 Paragraph 4.4.105 of policy H12 makes reference to policy ER1e which covers potential future student accommodation provision at St Patrick's Hall, Northcourt Avenue. Through development at St Patrick's Hall and other sites within the Whiteknights Campus, the University's 10 year Estate Strategy (which is expected to be reviewed during the Plan period) will continue to outline how these growing needs will be met.

1.2 Issue 2 – Question 3.14

- 1.2.1 Clause b) includes a requirement for 'water neutrality' where possible. Water neutrality is explained as a concept within the supporting text but it is not clear how this would be achieved in practice, and the requirement is not justified in terms of viability and feasibility. For example, arrangements for offsetting would need to be provided, assuming that most developments would not be able to achieve water neutrality on site due to cost impacts and feasibility.
- 1.2.2 The minimum requirement, to achieve the optional, higher standard in Buildings Regs Part G is supported on the basis that the Thames Water area is designated by the Environment Agency as a region of 'extreme water stress'.
- 1.2.3 Clause c) proposes energy based metrics for energy efficiency and a requirement for on-site energy generation to match annual demand, with an 'exceptional basis' clause. The use of energy based metrics is in line with the best practice approach to energy use in buildings, as defined by LETI and other bodies and this approach has been adopted by other planning authorities, including Bath and North East Somerset and Cornwall. However, the target proposed by Reading is more ambitious for both space heating demand and for total energy demand.



- 1.2.4 The evidence presented in the Viability Assessment notes a 15% uplift for ‘sustainability’ although there is some ambiguity over whether this is to account for the impact of the energy-based metrics policies only (improved fabric standards and use of low and zero carbon technologies) or whether this cost uplift also includes a) impact from the changes to building regulations in 2021 and b) other ‘sustainability’ policies including water efficiency. The cost sources cited within the Viability Assessment include a range of studies including one dated 2024, and it is noted that there is some uncertainty over the costs from recent Building Regulations changes, with the 15% uplift being at the mid to upper range.
- 1.2.5 The ‘exceptional basis’ clause provides for schemes where the energy targets and renewable generation targets cannot be met. The clause provides minimum and maximum per plot contributions, but it is not clear how these amounts will be calculated in relation to the energy performance not achieved. Offsetting is more commonly used to offset carbon emissions (as opposed to energy performance shortfall) and as such clarity is required to indicate the offsetting approach – for assessment methodologies, offsetting periods, pricing mechanisms and legal arrangements.
- 1.2.6 On national policy, the use of energy based metrics differs from the approach taken by Building Regulations (which are based on carbon metrics). For consistency with national regulations, improvements over Building Regulations should be expressed in terms of carbon metrics i.e. x% improvement over Part L of the Building Regulations.
- 1.2.7 In summary, the energy performance targets and use of an exception basis clause is supported. However, the financial contribution mechanism is not supported, as it is not clear how this has been calculated, nor how it relates to a development’s anticipated energy shortfall.

1.3 Issue 2 – Question 3.17

Is Policy H12 justified and based on robust and up-to-date evidence?

- 1.3.1 Policy H12 is unchanged from the existing policy set out in the adopted Reading Borough Local Plan.
- 1.3.2 However, there are some changes proposed to the supporting text. This includes paragraphs 4.4.104 to 4.4.107 (previously 4.4.97 to 4.4.102). Comments are provided on some of the text relating to The University of Reading.
- 1.3.3 At paragraph 4.4.104 the text refers to the 2024 Housing Needs Assessment (HNA) and its conclusions on the need for additional purpose-built student accommodation. This builds on the Strategic Housing Market Assessment (2016) which was used in the adopted Reading Borough Local Plan. The text states:
- 1.3.4 **“The HNA (2024) looked at the issue of need for additional student housing. It notes, based on information from the Higher Education Statistics Agency (HESA) that full-time student numbers have remained relatively unchanged at the University of Reading between 2017 and 2022. It did not identify a specific need for additional purpose built student accommodation, although it did note that the impacts of the Covid pandemic will have impacted figures over this period. Ultimately, the need for accommodation is very dependent on any growth plans at the University, and, although there are no current firm plans for expansion, this is subject to change. It is agreed that there is a current shortfall in University accommodation of around 1,000 bed spaces for first year**



students. Across all years of study, for 2021/22, 3,400 students were housed in rented accommodation other than university or private halls.”

- 1.3.5 The University supports the acknowledgement that the need for student accommodation is dependent on the growth plans of the University. The University has a total student population of around 27,000 students across all of its locations around the world. In Reading itself, the University currently has around 20,000 students (15,500 full time students, of these around 13,000 are undergraduates (HESA 2023/24)). The University currently anticipates around 1,850 additional students in the period to 2030 above the current student population. As such, the supporting text should be amended to further acknowledge that there are changing circumstances and priorities for the University which will lead to the need for additional new built development in the medium to longer term. We also note that the Local Plan time horizon is longer than its 10 year Estate Strategy, which it likely to be reviewed prior to the end of the Local Plan period. Subsequently, paragraph 4.4.104 should be amended to read:

“The HNA (2024) looked at the issue of need for additional student housing. It notes, based on information from the Higher Education Statistics Agency (HESA) that full-time student numbers have remained relatively unchanged at the University of Reading between 2017 and 2022. It did not identify a specific need for additional purpose built student accommodation, although it did note that the impacts of the Covid pandemic will have impacted figures over this period. Ultimately, the need for accommodation is very dependent on any growth plans at the University, and, although there are no current firm plans for expansion, this is subject to change. **The University will continue to keep this under review in order to support and deliver any new buildings including student accommodation (either through new buildings, redevelopment/replacement, refurbishment, extension or repurposing/conversion of existing buildings for 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.** It is agreed that there is a current shortfall in University accommodation of around 1,000 bed spaces for first year students **to address the anticipated growth to 2030 and to ensure additional capacity (for decanting space) to support the ongoing rolling programme of refurbishment and maintenance across University student accommodation.** Across all years of study, for ~~2021/22, 3,400~~ **2023/24, around 4,000** students were housed in rented accommodation other than university or private halls.”

- 1.3.6 The figure relating to the number of students across all years of study in rented accommodation other than university or private halls in 2023/24 is taken from figures from Higher Education Statistics Agency (HESA) data.
- 1.3.7 Policy H12 is considered to be sound, however minor amendments are sought to the supporting text as set out above.

