



Reading Borough Council Local Plan Partial Review Examination Stage 2 Hearing Statement

Matter 4 – Cross Cutting Policies

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Prepared for:
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1 Matter 4: Cross-cutting policies

1.1 Issue 1 – Question 4.2

Is the LPPU positively prepared in respect of climate change? Having regard to Policies CC2, CC3, CC4 and other policies within the LPPU, would the LPPU be consistent with national policy and legal requirements in relation to climate change?

- 1.1.1 The policies listed are generally aligned with the NPPF and with legislation in relation to climate change. They are also aligned with Reading's Climate Emergency Strategy 2020-25. Policy CC3: Adaptation to Climate Change is supported by RBC's Climate Change Adaptation Framework report, which sets out links to the UK's climate adaptation policy framework.
- 1.1.2 Whilst the high level links between policy intent national requirements, national policy and legal requirements are apparent, there are challenges with the wording, terminology and approaches for some policies, which may impact the effectiveness of the intended outcomes. These are addressed in the other sections in relation to specific policies.

1.2 Issue 1 – Question 4.3

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

- 1.2.1 The Reading Climate Emergency Strategy forms part of the evidence base and identifies a target for Reading to achieve net zero emissions by 2030, and a requirement for new homes to low and zero carbon energy standards, with an associated action to 'introduce high standards of energy efficiency for new development, with RBC as the delivery partner. However, there is a gap in evidence that would support the identification of the specific targets for space heating and total energy use indicated in the draft policy wording which means that the policy has not been sufficiently justified. Cost uplift information specific to non-residential developments has not been provided.

1.3 Issue 1 – Question 4.4

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

- 1.3.1 The Policy contains requirements in the first paragraph for all development, and in subsequent paragraphs sets out performance requirements for non-residential development only. This is lacking clarity, as the applicant then needs to refer to another policy section to locate the performance requirements for residential development. It is therefore neither clear or unambiguous. Further, inconsistencies in water neutrality performance standards between CC2 and H5 mean it is unclear how these policies work together. Within CC2, water neutrality is encouraged, whereas within H5 water neutrality is defined as to be achieved 'where possible'. See comments under question 3.14 regarding water neutrality and challenges with implementation in terms of offsetting assessment and viability.



- 1.3.2 Clarity would be improved by either a) providing one policy for all standards relating to Sustainable Design, Construction and Building Performance with clear sections for residential and non-residential, or b) providing two separate policies, one for residential and one for non-residential. The first paragraph sets high level expectations and could be incorporated into each policy if needed.
- 1.3.3 To ensure effectiveness, the University proposes two amendments. Firstly, that the proposed policy is explicit in stating that the requirements to achieve energy targets are applied to new buildings only. Secondly, that the proposed policy is developed to include energy targets for different development types within the overall categorisation of new non-residential, due to the differing requirements for building typologies and users.

1.4 Issue 1 – Question 4.5

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

- 1.4.1 It is limited. The achievement of energy targets and net zero carbon through renewables for change of use and extensions is likely to be challenging to achieve and, in some cases, will not be practicable. For example, achievement of on-site renewable energy generation to balance demand may not be feasible or viable depending on the scope for reducing energy demand through fabric improvements combined with the availability of space for new renewable energy generation technology. It is not considered that the policy should apply fully to all change of use applications or proposed extensions. The policy wording should be adjusted to provide clarity on which requirements apply to new developments, and which apply to developments which are limited to extensions or redevelopment. There is a separate sentence on conversions to residential, but these may be distinct from extensions or redevelopment of existing non-residential spaces.
- 1.4.2 In summary, it is likely to be challenging to achieve net zero targets for many redevelopment projects given technical and viability considerations.
- 1.4.3 The distinction between new development and redevelopment should be applied to both energy and water consumption requirements.

1.5 Issue 1 – Question 4.6

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

- 1.5.1 The policy should only relate to applications for planning permission (outline or full) and the policy should be amended to make this clear. Requirements relating to energy efficiency, fabric performance and renewable energy generation may be challenging to apply to schemes which have achieved outline consent and where the design has progressed to a point where layout and energy strategies are fixed. Similarly, requiring schemes with established designs to incorporate technical requirements for post-occupancy monitoring and water consumption at a later stage may impact cost and commercial viability.



1.6 Issue 1 – Question 4.8

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

- 1.6.1 As CHP is generally taken to refer to fossil-fuel powered systems, it is no longer considered appropriate due to the carbon impact. The policy text refers to decentralised energy production, with CHP referred to in the supporting text.
- 1.6.2 We note that the List of Submission Changes adjusts the policy wording from ‘decentralised energy production’ to ‘low carbon heat network’ and removes references to CHP from the supporting text, to align the policy with emerging technologies. This change aligns with our previous comments and is supported.

1.7 Issue 1 – Question 4.9

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

- 1.7.1 The University supports the principle of good design to comply with the requirements of chapter 12 of the NPPF. It also supports the structure of policy CC7 to reflect the principles set out in the National Design Guide and National Model Design Code. This ensures consistency with national policy and provides clarity on the design standards for proposed development. However, the University maintains its concerns raised at Regulation 19 consultation representations, as set out below:
- 1.7.2 Regarding bullet point 1 (context) of the policy, this advises that the development will need to ensure that it makes a contribution towards enhancing its surroundings. Paragraphs 135(c) and (e) of the NPPF (December 2023) details that developments should be sympathetic to local character and history, and optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public spaces). However, policy CC7 is not effective and is unrealistic, requiring all proposals to enhance their surroundings. While development should seek to avoid any detrimental impact on its surrounding, it may not be practicable or possible for all proposed development to enhance the surrounding of a site whilst meeting the needs of development. There is a need for balance and so the wording of the policy should be amended as follows to make it effective and consistent with national policy:

“Context – enhances the surroundings **where possible** based on a sound understanding of the features of the site and its surroundings and is responsive to local history, culture and heritage.”

- 1.7.3 Bullet point 5 (nature) of the policy advises that the development will need to ensure that it makes a contribution towards and enhancing and optimising nature. The policy is not effective and is unrealistic, requiring all proposals to enhance and optimise ‘nature’. While development should seek to avoid any detrimental impact on such considerations, it may not be practicable or possible for all proposed development to enhance or optimise ‘nature’ whilst meeting the needs of development.
- 1.7.4 Bullet point 5 (nature) further states that schemes should ‘retain existing trees and aim to establish new trees’. This part of the policy is too onerous, is unrealistic and therefore not



effective as no distinction has been made regarding the value of existing trees. It indicates all trees have to be retained and protected. The policy would be effective and consistent with national policy if it seeks to retain trees that make positive contribution to visual or residential amenity, heritage or nature conservation value. This part of the policy is in conflict with the policy wording set out in Policy EN14 'Trees, Hedges and Woodlands' which states that 'Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal **where they are of importance**' (**our emphasis**). This would accord with paragraph 136 of the NPPF (December 2023) which sets out the importance of trees to the character and quality of urban environments.

- 1.7.5 The wording of the policy should be amended as follows to make it effective and consistent with national policy:

"Nature – enhances and optimises nature **the natural environment where possible** by integrating existing and new natural features into a multifunctional network to support quality of place, biodiversity, water management and climate change mitigation. Schemes should retain existing trees **where they are of importance by virtue of their contribution to visual or residential amenity, heritage or nature conservation value** and aim to establish new trees."

- 1.7.6 The remaining characteristics are all aligned with the objectives set out in paragraph 135 of the NPPF (December 2023) and listed below.

- 1.7.7 Policy CC7 is clear in its presentation of information relating to design and the public realm.

1.8 Issue 1 – Question 4.10

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

- 1.8.1 Paragraph 4.1.35 of CC7's supporting wording sets out that design issues are expected to be dealt with at pre-application stage. For major proposals with significant design implications, RBC will engage with design review bodies as part of the process. This approach is supported by PPG (ID: 26-017-20191001).

- 1.8.2 Notwithstanding the comments above, CC7 and its supporting wording is too ambiguous in terms of:

a) how a positive contribution is measured; and

b) whether every scheme is expected to meet all Policy CC7's parameters?

- 1.8.3 In light of this, we consider the wording of CC7 should be amended to read:

"Proposals will be assessed **against the extent to which** ~~to ensure that~~ the development makes a positive contribution within the following characteristics, **having regard to paragraph 139 of the NPPF**".



1.9 Issue 1 – Question 4.14

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

- 1.9.1 The first sentence of the policy states that ‘*Development that would detrimentally affect health will not be permitted unless it can be demonstrated that negative effects are mitigated*’. While the University agrees that development should seek to promote healthy places and reduce the impacts of development on health wherever possible, it is considered that this part of the policy wording as drafted is too broad, and overly restrictive. Paragraph 96 (b) and (c) of the NPPF (December 2023) detail the importance of safety and supporting healthy lifestyles. To align better with national policy, we would consider CC10 should better reflect a supportive approach for healthy, inclusive and safe places and building, rather than its current form which focuses of mitigating impacts on health.
- 1.9.2 It is therefore not considered that the policy as drafted is effective, and will constrain development. Chapter 8 of the NPPF seeks to achieve healthy, inclusive and safe places. However, it does not address the direct impacts of development on health. To make the policy sound, it is considered this part of the policy should be amended to read:
- “Development **must consider impacts on the health of existing and future residents** ~~that would detrimentally affect health will not be permitted unless it can be,~~ **and where applicable**, demonstrated that negative effects are mitigated..
- 1.9.3 It also requires that: “Proposals for major development or for proposals for accommodation for vulnerable people must be accompanied by an HIA which includes (but is not limited to)“. This part of the proposed policy is supported.
- 1.9.4 It is considered that the amendments above are required to ensure that policy CC10 effective and in accordance with national policy and therefore is sound.