

Examination of the Reading Borough Local Plan Partial Update

Our ref 67717/02/DL/NK

Date 9 January 2026

Subject Matter 10: Site-specific policies – Central Reading

This Hearing Statement has been submitted by USS Investment Management Ltd ('USS'); promoting land at Aquis House (policy CR14t) and 33 Blagrove Street (policy CR14u) which are proposed for allocation in the emerging Reading Borough Local Plan Partial Update.

1.1 The Reading Local Plan Partial Update (LPPU) is being examined against the version of the National Planning Policy Framework (NPPF) published in December 2023, in line with the transitional arrangements set out in Annex 1 of the December 2024 version of the NPPF. It is therefore also being examined against the version of Planning Practice Guidance (PPG) that underpinned the 2023 NPPF. References within this statement to 'NPPF' and 'PPG' should be taken as those associated with the December 2023 Framework, unless otherwise stated.

1.2 This Matter Statement should be read alongside the submissions made by Lichfields on behalf of USS at Regulation 19 Stage, which can be found at LPP07 (5 of 6).

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

Q10.1) Is the strategy for Central Reading justified?

2.1 Notwithstanding our comments below about policy CR10, USS consider the overall Strategy for Central Reading to be justified. The strategy, among other things, seeks to accommodate around 8,700 dwellings (around 59% of the total planned) between 2023 and 2041. This is broadly consistent with the strategy of the adopted RBLP (2019) which sought to accommodate 7,600 homes between 2013 and 2036 (around 49% of the total planned for).

2.2 The potential for Central Reading to accommodate the majority of Reading's housing requirement, and its consideration through this stage of the Local Plan Hearings process is heightened by the Inspectors initial conclusions from the Stage 1 of the Hearings (EX030)¹

2.3 This strategy reflects the significant role that the 'Central Reading' area can play in accommodating growth, at a scale that is proportionate to its accessibility as "*one of the most accessible locations in the South East*" (LPPU, para 4.1.26). Reading station provides

¹ Stating (para 9) that "*it will be necessary for the Council to produce main modifications to the supporting text of Policy H1 and any other relevant areas in the LPPU to reflect the use of the standard method figure of 822 dwellings per annum*"

rail / coach links to London Paddington, Oxford, Gatwick and Heathrow Airport among many others. Bus services within Reading town centre also provide direct services to Reading University, Green Park, Thames Valley Park and smaller district centres such as Woodley and Caversham, as well as many destinations further afield.

- 2.4 The Strategy highlights the scope for additional tall buildings, including that “*the tallest buildings will be in the most accessible location, around the station*” (LPPU para 5.2.13). This is consistent with policy CR10 and the NPPF’s support for Strategic Policies setting out “*a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land*” (NPPF 2023 para 123).
- 2.5 However our clients are concerned that elements of policy CR10 and other elements of the LPPU are not consistent with this overarching strategy or sufficiently ambitious in guiding development proposals on sites within this accessible location and which provide opportunities which are consistent with key provisions within the NPPF. These concerns are expanded upon within our Regulation 19 representations and summarised below.

Q10.6) 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?

- 2.6 Our previously submitted Regulation 18 and 19 representations have highlighted the importance of making effective use of Brownfield land in accessible locations in line with NPPF provisions which:
- 1 seek to make “effective use of land” (para. 8c)
 - 2 seek to make “*as much use as possible of previously developed or ‘brownfield’ land*” (para. 123)
 - 3 should contain policies to “*optimise the use of land in their area and meet as much of the identified need for housing as possible*” (para. 129a)
 - 4 require that “*significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*” (para. 109).
- 2.7 Our client supports the key principles of policy CR10 and considers the principle of defining tall building areas, identified as having potential to deliver tall buildings reflecting their sustainable location, is consistent with the NPPF as above.
- 2.8 Our previous Regulation 18 representations highlighted the need to update the LPPU’s policy approach to tall buildings via policy CR10, to reflect emerging housing requirements and the provisions of the NPPF, including those above. The subsequent principle, within the submitted LPPU of adding ‘areas of less suitability for tall buildings’ to the existing three tall building clusters defined by policy CR1 is justified in recognition of the sustainability of the locations identified, and their potential appropriateness to deliver tall buildings, subject to further detailed assessment work.

- 2.9 However our clients retain a number of concerns about the provisions of this policy which will guide development in accessible town centre locations relating to the type of sites which are afforded further support by the NPPF. These concerns include:
- They consider policy CR10 should be reworded to identify these locations as ‘other areas of potential for tall buildings’ (instead of ‘areas of less suitability for tall buildings’) to reflect the intention of the policy, and Strategy for Central Reading, which seek to permit tall buildings in appropriate locations. The lack of ambition inherent within the wording of this policy is heightened by the commentary within the evidence base² (para 9.10) that “*it should also be recognised that those areas continue to have a reduced suitability compared to the [currently] identified clusters*” and
 - They also consider there is scope for policy CR10 to consider wider areas suitable for inclusion within both ‘areas of potential for tall buildings’ or ‘other areas of potential for tall buildings’ (in line with our suggested wording above). Our client’s site 33 Blagrove Street (policy CR14u) would be suitable for such inclusion given the potential for marriage opportunity with Aquis House (policy CR14t) which is within the currently identified ‘area of less suitability for tall buildings’, especially given inclusion would not, in isolation, be determinative of suitability.

Q10.7) Does Policy CR10 unnecessarily repeat other LPPU policies?

- 2.10 No – policy CR10 makes provision for areas where tall buildings can be developed, including, as currently worded, ‘areas of less suitability for tall buildings’ which are important, and reflect the principles of NPPF, for the reasons outlined in our earlier response to Q10.6.
- 2.11 Without designating, as currently worded, ‘areas of less suitability for tall buildings’, Policy CR10 would effectively fetter ‘tall buildings’ being developed outside of the three identified tall building clusters, on sites such as our clients’. This would fail to optimise, and make effective use of brownfield sites, which in the case of our client’s site, benefits from exceptional transport accessibility.

Qs 10.13 – 18) – Sites CR14t and CR14u

- 2.12 The background to the proposed allocation of our client’s site at both CR14t (Aquis House) and CR14u (33 Blagrove Street), and our clients position on their development potential (following recent feasibility work) is set out in our Regulation 19 Representations.
- 2.13 This is largely unchanged since these representations and is not repeated here. Our involvement in the Local Plan Hearings process reflects our client’s position that both sites form realistic development options over the plan period.

Concerns with LPPU assessment of development potential

- 2.14 In response to question 10.14 our clients wish to amplify their concerns (set out within the Regulation 19 Representations) that the LPPU policies (and the RBC analysis underpinning

² Reading Borough Local Plan Partial Update Tall Buildings Strategy Note (May 2025)

this) fails to fully recognise the development potential of the site to meet the recognised housing and other needs within the development plan.

2.15 Their concerns include :

- The application of a uniform average residential density of 327 dph which is at the lower end of residential density achieved during 2013 – 2023 and doesn't reflect the surrounding residential density of the site
- The use of a plot ratio which also does not reflect the variance of those achieved recently;
- The lack of recognition within the analysis that the Aquis House site falls within the proposed "*area of less suitability for tall buildings*"; and
- Both our clients sites are, despite adjoining each other, are considered in isolation

2.16 They therefore consider that the policy should be amended to incorporate greater flexibility to enable development proposals to respond to these development needs.