



Local Plan Partial Update

Consultation on Scope and
Content (under Regulation 18),
November 2023



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1. Introduction

- 1.1 The Reading Borough Local Plan was adopted on 4th November 2019. It sets out the planning policies and proposals for Reading up to 2036 and is the main consideration when deciding planning applications. This document is the first stage of consultation upon a Partial Update of the plan to cover a selected group of policies. It asks for your views on how this Partial Update should be carried out to inform drafting of updated policies.

Background

- 1.2 Local planning authorities are required by law to undertake a review of their local plans within five years of [adoption](#), as set out in Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The purpose of the review is to examine whether or not policies are up-to-date and whether there is therefore a need to update them. Reading's local plan review was required to be undertaken by 4th November 2024.
- 1.3 A Local Plan Review has been carried out and was published in March 2023¹. This identified a need to update 45 of the 90 policies in the plan². It was therefore decided to progress a Partial Update of the Local Plan, covering those identified policies only together with associated parts of the plan such as the spatial strategy and infrastructure delivery plan, rather than a full update of the entire plan.
- 1.4 On 27th April 2023, the Council also publicised a 'Call for Sites', which is an invitation for sites to be nominated for inclusion in the Local Plan, generally for development but also potentially for other designations. This resulted in 17 sites in Reading in addition to those already identified being nominated for inclusion, and these are presented for consultation in the relevant section of this document.

Understanding this consultation

- 1.5 This consultation document consults on proposed changes to each policy and part of the plan that is within the scope of the update. These are set out in order of the existing Local Plan. The document describes the approach that will be taken to updating each policy, but does not contain a draft update. Full draft policies will be a matter for the next consultation. The document also briefly describes any potential alternative approaches that have been identified, for an understanding of the options available.
- 1.6 As the focus of the consultation is on how the adopted plan should be updated, it needs to be read in conjunction with the policies in that document³.
- 1.7 In the 'Area-specific policies and site allocations' section of this document (section 12) we also ask for your views on the new sites nominated for inclusion as a result of the 'Call for Sites' exercise, or on any significant proposed changes to existing sites. Please note that inclusion within this document does not mean that the site will be included in the final plan, but it is important that a consultation is undertaken to inform

¹ [Local Plan Review March 2023 \(reading.gov.uk\)](#)

² As work has progressed on the Partial Update, a need to update a further two policies has arisen –H14: Suburban renewal and regeneration and RL4: Betting shops and payday loan companies

³ [Local Plan Adopted November 2019.pdf \(reading.gov.uk\)](#)

any decision to include or exclude a site. An initial description of issues and constraints is included with each site, but often further evidence will be necessary before there can be a final conclusion.

- 1.8 Specific questions are asked for each matter. You can answer whichever questions you want, and do not need to answer all questions in the document.

Responding to the consultation

- 1.9 The contents of this document are open for consultation, and we welcome your views.
- 1.10 Comments should be made in writing by 5 pm on 31st January 2024. Written comments should be submitted by e-mail or by post.
- 1.11 E-mailed comments should be sent to planningpolicy@reading.gov.uk
- 1.12 Comments sent by post should be addressed to:

Planning Policy Team
Reading Borough Council
Civic Offices
Reading
RG1 2LU

Next steps

- 1.13 Once this consultation is complete, the Council will consider the comments received. A draft of the Partial Update will then be prepared, taking account of those comments. This draft will be under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which means that it will be the Council's final draft before [submitting](#) the Partial Update to the Secretary of State. Submission marks the beginning of a process of public [examination](#) undertaken by an independent inspector, who will determine whether the plan is [sound](#), legally compliant and fulfils the duty to co-operate. Depending on the outcome of this process, the Partial Update can be adopted. An updated version of the Local Plan incorporating the Partial Update will then be produced, and this will form part of the [development plan](#), which is the first consideration in deciding planning applications.
- 1.14 The timetable for progressing this Partial Update is set out in detail in the most recent [Local Development Scheme \(LDS\)](#) from November 2023, available on the Council's website⁴.
- 1.15 The [Levelling-Up and Regeneration Act](#) received royal assent in October 2023. This makes significant changes to the system of local plan production. However, there are proposed transitional arrangements that are expected to mean that this Partial Update can continue to be produced under the old system.

⁴ [Planning policy - Reading Borough Council](#)

2. Important policy background and evidence

- 2.1 The existing Local Plan is underpinned by a considerable evidence base, and the Partial Update will also require support by further or updated pieces of evidence. This will be assembled alongside the plan and needs to be available at the latest when the plan is [submitted](#). The plan also needs to sit alongside a whole range of other plans, strategies and policies. A summary of some of the most important areas of evidence is set out below.

National policy

- 2.2 National planning policy is mainly set out in the [National Planning Policy Framework \(NPPF\)](#), the most recent update to which was published in September 2023. The NPPF is expected to evolve further as the Partial Update is produced. However, national planning policy can also come from other sources, including written ministerial statements and freestanding policy documents. Local planning policy is expected to be in general conformity with national policy.

Local policy

- 2.3 There are a range of other documents produced to cover Reading, or a grouping of wider authorities, that are of relevance to the Partial Update. These include the Council's Corporate Plan, the Reading Climate Emergency Strategy, Transport Strategy and Housing Strategy among others. There is also an adopted Central and Eastern Berkshire Joint Minerals and Waste Plan that covers Reading, Wokingham, Bracknell Forest and Windsor and Maidenhead and has [development plan](#) status alongside the Local Plan. The Minerals and Waste Plan does not fall within the scope of this update. In addition, the local plans of areas adjoining Reading are of importance. These plans and strategies are referenced in the individual policy update sections where they are of relevance.

Census 2021

- 2.4 Some of the results from the 2021 Census have recently been published, covering a number of key matters. Of perhaps the greatest significance, in particular because it is strongly related to housing need, is the change in population and number of households.
- 2.5 There has been an increase in population of Reading Borough from 155,698 to 174,224 between 2011 and 2021, an approximately 12% population increase. There has also been an increase in households over the same period, rising from 62,869 to 67,683, an approximate 8% increase. Of particular relevance is that the 4,814 increase in the number of households over than ten-year period is lower by around 1,000 to 1,200 than what was anticipated by both the 2014-based household projections (used as the basis for the national [standard methodology](#) for calculating housing need) and the household forecasts developed as the demographic basis for calculating housing need in the existing Local Plan⁵. It is also lower by around 1,000 than actual housing delivery over that period, which totalled a net gain of 5,792. This matter is discussed later in this document in relation to policy H1.

⁵ From the Berkshire (including South Bucks) Strategic Housing Market Assessment

- 2.6 Some of the other key headlines from the Census are as follows:
- An increase in household size;
 - A shift from owner occupation towards private renting;
 - An overall ageing population with a higher proportion of those over 65 and a lower proportion of those under 18;
 - Declining economic activity rates; and
 - A very significant increases in homeworking among Reading residents, unsurprisingly given the timing of the Census during the pandemic;

Housing needs

- 2.7 National policy is that housing need should usually be calculated based on a national standard methodology that is outlined in [Planning Practice Guidance](#). This methodology takes into account projections of household numbers and local housing affordability, whilst also applying a 35% uplift to the local authorities that cover the core of the 20 largest urban areas in England, of which Reading is one. This means that, based on most recent figures, there is a need for 877 homes per year in Reading up to 2041, a substantial increase from the existing plan figure of 689 per year.
- 2.8 The Council has commissioned work on housing needs to give a counterpoint to this standard methodology figure that is rooted in local need. A Housing Needs Assessment, being undertaken by Opinion Research Services Ltd, is underway. In addition to overall levels of need, this looks more specifically at the different types of housing needed including affordable and family-sized housing, and the different groups requiring housing. The Assessment has not yet fully reported, and will be published in due course, but initial conclusions are that local need is likely to be considerably lower than the figure produced by the standard methodology.
- 2.9 Section 8 of this plan looks at this matter in more detail.

Call for sites

- 2.10 The Council carried out a ‘call for sites’ exercise between April and June 2023 to seek to identify any additional sites for development or for other designations. This resulted in 15 additional sites within Reading being nominated for development, primarily for residential use. In addition to this, three strategic locations outside Reading were put forward. Finally, there were six suggestions for changes to existing allocations.
- 2.11 All of the proposed additional sites are summarised under the policy to which they would be added if suitable – e.g., for those in South Reading, this would be SR4 (Other Sites for Development in South Reading). The full detail of each proposed additional site, including a location plan, is in Appendix 2.

Sustainability appraisal

- 2.12 It is a requirement of producing a local plan that it be accompanied by a sustainability appraisal. A sustainability appraisal examines the effects of plans and policies against a number of environmental, social and economic objectives. A Sustainability Appraisal of the Partial Update Consultation on Scope and Content is available on

the Council’s website⁶. This process incorporates the scoping stage of [Equality Impact Assessment](#) and [Habitat Regulations Assessment](#).

2.13 The most recent [Sustainability Appraisal Framework](#) was produced in 2014. This remains a reasonable basis for undertaking sustainability appraisal, but some of the objectives require updating to ensure that they are in line with priorities in 2023. It is proposed that the sustainability objectives are updated as follows (shown in tracked changes format):

- Objective 1: To ~~limit the impact of climate change~~ address the climate emergency through minimising CO2 emissions and other greenhouse gases.
- Objective 2: Adapt to inevitable climate change in terms of preparedness for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.
- Objective 3: Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.
- Objective 4: Minimise the consumption of, and reduce damage to, undeveloped land.
- Objective 5: Minimise the generation of waste and promote more sustainable approaches to waste management.
- Objective 6: Minimise air, water, soil/ ground and noise pollution, and improve existing areas of contaminated land and poor air and water quality.
- Objective 7: Value, protect and enhance the amount and diversity of wildlife, habitat and geology, and other contributors to natural diversity, including establishing/enhancing ecological networks, including watercourses and surrounding corridors.
- Objective 8: Avoid contributing towards a likely significant effect, either alone or in combination with other plans and projects, that could lead to an adverse effect on the integrity of internationally-designated wildlife sites.
- Objective 9: Create, enhance and maintain attractive and clean environments including protecting and, where appropriate, enhancing landscape and townscape character.
- Objective 10: Value, protect and, where possible, enhance the historic environment and the heritage assets therein and the contribution that they make to society and the environment.
- Objective 11: Protect, promote and improve human health, safety and well-being including through healthy lifestyles.
- Objective 12: Promote strong and vibrant communities through reduction in crime, and the fear of crime and enhanced community cohesion.
- Objective 13: Ensure high quality housing of a type and cost appropriate to the needs of the area.
- Objective 14: Reduce the need for travel and transport particularly by car or lorry, ~~and~~ facilitate and encourage sustainable and active travel choices.
- Objective 15: Ensure good physical access for all to essential services and facilities, including healthcare.

⁶ [Weblink to be added]

- **Objective 16:** Avoid significant negative effects on groups or individuals with regard to race, **age**, disability, gender reassignment, pregnancy and maternity, religion or belief, sex or sexual orientation.
- **Objective 17:** Value, protect and enhance opportunities for all to engage in culture, leisure, and physical and recreational activity, particularly in areas of open space and waterspace.
- **Objective 18:** Facilitate sustainable economic growth and regeneration that provides employment opportunities for all and supports a successful, competitive, **inclusive** and balanced local economy that meets the needs of the area.
- **Objective 19:** Reduce deprivation and inequality within and between communities.
- **Objective 20:** Maximise access for all to the necessary education, skills and knowledge to play a full role in society and support the sustainable growth of the local economy.

Q1: Do you agree with the changes to the sustainability objectives to be used in carrying out sustainability appraisal?

Other evidence

- 2.13 There will be further updated evidence that needs to be assembled, in particular for matters such as needs for employment and other commercial floorspace, flood risk, transport impacts and whole plan viability, as well as a full refresh of the [Housing and Economic Land Availability Assessment \(HELAA\)](#). This will inform the full draft of the Partial Update and will be published as it is finalised. Evidence may indicate that the direction of the individual policy updates need to change from what is described in this document.

3. Vision, objectives and spatial strategy

- 3.1 As it is not proposed to undertake a comprehensive overhaul of the Local Plan, it is also not intended to completely revise the vision, objectives and spatial strategy of the plan. However, there are nevertheless some important updates and changes that are required.

Climate emergency

- 3.2 The impacts of climate change are already being felt across the globe, and will only become more obvious over the lifetime of the plan. Everyone will be impacted, but the indications are that those who are already most vulnerable will be disproportionately affected. Reading Borough Council takes this extremely seriously, and declared a Climate Emergency in February 2019, together with setting a target of a [net zero carbon](#) Reading by 2030. Although the need to tackle climate change was fundamental to the existing plan, the declaration of a Climate Emergency and accompanying 2030 target were too late for inclusion. The target will not be met without all relevant plans and strategies striving to achieve it. There is therefore a clear need for an update to ensure that the Climate Emergency is central to both the vision and objectives of the Local Plan.

Q2: How should the Climate Emergency be reflected in the vision and objectives?

- 3.3 Reading's Climate Emergency Strategy 2020-25 was published in 2020. This includes a large number of actions, many of which are relevant to the Local Plan. These are discussed in relation to individual policy updates where relevant.

Level of development in Reading

- 3.4 The level of need for different types of development in Reading will need to be reassessed. This work is already underway for housing, and will also need to be undertaken for other forms of development. For the most part this is discussed in relation to individual policies, e.g. H1. The general expectation is that figures for housing provision are likely to increase, whilst needs for commercial forms of development are not expected to significantly increase. Overall levels of development will be continue to be set out in the spatial strategy.

Spatial approach to development in Reading

- 3.5 The fact that Reading is a geographically small, urban authority means that development relies almost wholly on previously-developed land, and the spatial strategy is to a large extent dictated by where sites are available. The existing spatial strategy has a focus on Central Reading and, to a lesser extent, South Reading because this is where the sites with the greatest potential are. It was expected that, over the existing plan period from 2013 to 2036, around 50% of the housing to be provided would be in Central Reading and around 24% would be in South Reading. In terms of commercial uses, almost all of the retail and leisure uses and the majority of office uses are expected to be in Central Reading, whilst virtually all of the industrial and warehouse uses will be in South Reading.

- 3.6 Looking forward to 2041, there will have to be an even stronger focus on Central Reading if we are to deliver housing to meet needs. The new sites that have been put forward and are set out in Appendix 2 are dominated by town centre sites. It is estimated that the proportion of new homes that are delivered in the town centre is likely to increase from around 50% to 60% as a result of the update and the roll forward of the plan period.
- 3.7 Whilst delivering homes at high density in the town centre is the only way that Reading can get close to meeting needs within its boundaries, this causes other issues. In particular it is very difficult to secure family-sized homes of three or more bedrooms in the town centre. Over the period of the existing plan, housing delivery has been dominated by one and two-bedroom homes. This places greater importance on delivery of family-sized [dwellings](#) wherever they can be achieved, but particularly outside the town centre.

Beyond Reading’s boundaries

- 3.8 The Local Plan Partial Update can only directly influence development within Reading’s boundaries. The urban area centred on Reading extends into neighbouring authorities West Berkshire and Wokingham, whilst settlements in those authorities as well as South Oxfordshire look to Reading for many services and facilities. Each of those authorities has its own local plan process where the role of development close to Reading’s boundaries is considered.
- 3.9 Previous evidence suggested that the West of Berkshire area (covering the authorities of West Berkshire, Reading, Wokingham and Bracknell Forest) had a strong functional relationship in terms of the housing market. This remains the case. The existing Local Plan identifies a small shortfall in meeting Reading’s housing needs within the authority’s boundaries of 230 dwellings, and there is a [Memorandum of Understanding \(MoU\)](#) that agrees that the shortfall will be met within the area covered by those four authorities. However, that MoU relates only to the level of need identified in the adopted plan, i.e. 699 homes per year. There is no agreement to deliver Reading’s unmet needs over and above that figure.
- 3.10 Figure 3.1 of the existing Local Plan is a contextual map from the 2016 [West of Berkshire Spatial Planning Framework](#) showing opportunities and constraints in the wider area around Reading. In particular it shows areas of search for major development including the Grazeley area and around the M4 south of the Kennet Meadows, neither of which form part of the latest Local Plan strategies for Wokingham or West Berkshire. This diagram is therefore considerably out of date and needs to be either removed or replaced with a new version showing the constraints and major developments from the most recent Local Plans. The accompanying text also needs to be significantly revised. Other diagrams showing the Grazeley development, such as in the South Reading section, also need to be revised.
- 3.11 During the [Call for Sites](#) exercise, a number of locations outside (or almost entirely outside) Reading were put forward for strategic scale development, including parts of all three of Reading’s neighbouring authorities. It is not the role of Reading’s Local Plan to consult on these potential development opportunities. However, the Council does recognise the strong interrelationships with those areas immediately outside our

boundaries, and we note that development on one side of the boundary is potentially capable of meeting needs arising on the other.

- 3.12 It is also worth being aware that Reading's housing needs under the national [standard methodology](#) (see section 8) are significantly increased by an urban uplift that is applied to the 20 largest urban areas in England. Reading only appears on this list of 20 because the defined urban area includes significant areas within other authorities, which raises the question of how that fact is best reflected in where development takes place.

Summary of proposed changes

- 3.13 The following changes are proposed:
- To amend the vision and objectives to reflect the Climate Emergency and the move to a net zero carbon Reading by 2030;
 - To amend the spatial strategy to reflect changes to overall levels of development and to subtly change the emphases on different areas of Reading to reflect available capacity; and
 - To remove out of date information on the context in neighbouring authorities including replacement of Figure 3.1 with an updated map showing constraints and major development areas.

Q3: Do you have any comments on the suggested changes to the vision, objectives and spatial strategy?

4. Plan period and strategic policies

Plan period

- 4.1 For plans that include housing, the expectation is that the plan period covers at least 15 years from [adoption](#). It is proposed that the base date of the plan change from 2013 to 2023 and the end date be pushed forward from 2036 to 2041 to ensure that there are 15 years plus a one-year buffer from the expected adoption date in 2025.

Q4: Do you agree with the proposed plan period of 2023 to 2041?

Identification of strategic policies

- 4.2 Since the Local Plan was drafted, a requirement has been introduced in the Neighbourhood Planning Act 2017, and further articulated in the [National Planning Policy Framework \(NPPF\)](#), for plans to explicitly identify which policies are strategic in nature. Strategic policies are those that “*set out an overall strategy for the pattern, scale and design quality of places*” according to paragraph 20 of the NPPF and should be limited to those that address strategic priorities and relevant cross-boundary issues. Such policies should look ahead for at least 15 years, and should make sufficient provision for development, infrastructure, community facilities and conservation and enhancement of the built, natural and historic environment.
- 4.3 The existing Local Plan does not explicitly label policies as being strategic or not, so this will need to be rectified in the update. It is proposed that the relevant policies will be labelled as a ‘strategic policy’ and that an appendix will be added listing the strategic policies,
- 4.4 Table 4.1 lists the policies that we have identified as being strategic in nature, together with the reasons they are considered to be strategic according to the NPPF. The content of these policies is only proposed to be updated where identified in this document.

Table 4.1: Identified strategic policies

Policy	Reason for identification (with NPPF reference)
CC2: Sustainable design and construction	Includes measures to address climate change mitigation (para 20(d))
CC3: Adaptation to climate change	Includes measures to address climate change adaptation (para 20(d))
CC4: Decentralised energy	Includes measures to address climate change mitigation (para 20(d)) and provide energy infrastructure (para 20(b))
CC6: Accessibility and the intensity of development	Addresses the pattern and scale of development (para 20)
CC7: Design and the public realm	Addresses the design quality of Reading (para 20)
CC9: Securing infrastructure	Makes provision for infrastructure (para 20(b))
EN1: Protection and enhancement of the historic environment	Provides for conservation of the historic environment (para 20(d))

EN7: Local green space and public open space	Provides for the conservation of the natural environment including green infrastructure (para 20(d))
EN8: Undesignated open space	Provides for the conservation of the natural environment including green infrastructure (para 20(d))
EN12: Biodiversity and the green network	Provides for the conservation of the natural environment including green infrastructure (para 20(d))
EN13: Major landscape features and areas of outstanding natural beauty	Provides for the conservation of the natural environment including landscapes (para 20(d)) and deals with features that span boundaries (para 21)
EN14: Trees, hedges and woodlands	Provides for the conservation of the natural environment including green infrastructure (para 20(d))
EM1: Provision of employment development	Identifies the level of employment to be provided across Reading (para 20(a))
EM2: Location of employment development	Addresses the pattern of development (para 20)
EM3: Loss of employment land	Addresses the pattern of development (para 20)
H1: Housing provision	Identifies the level of housing to be provided across Reading (para 20(a)).
H2: Density and mix	Addresses the pattern of development (para 20) and provides for the right housing to meet needs (para 20(a))
H3: Affordable housing	Makes provision for affordable housing to meet needs (para 20(a))
H5: Standards for new housing	Includes measures to address climate change adaptation (para 20(d))
H6: Accommodation for vulnerable people	Identifies the level of residential care to be provided across Reading (para 20(a)).
H12: Student accommodation	Addresses the pattern of development (para 20)
TR1: Achieving the transport strategy	Makes provision for sufficient transport infrastructure (para 20(b))
TR2: Major transport projects	Makes provision for sufficient transport infrastructure (para 20(b)) and includes projects with cross-boundary implications (para 21)
TR4: Cycle routes and facilities	Makes provision for sufficient transport infrastructure (para 20(b)) and includes routes that cross boundaries (para 21)
RL1: Network and hierarchy of centres	Addresses the pattern of development (para 20)
RL2: Scale and location of retail, leisure and culture development	Identifies the level of retail and culture development to be provided across Reading (para 20(a)) and addresses the pattern of development (para 20)
OU1: New and existing community facilities	Makes provision for community facilities (para 20(c))
OU2: Hazardous installations	Relates in part to the emergency planning zone of a facility in an adjoining authority with cross-boundary implications (para 21)
CR10: Tall buildings	Addresses the pattern and scale of development (para 20)

CR11: Station/River Major Opportunity Area	Strategic-scale development that makes significant contribution to providing for development needs (para 20(a)) and the pattern and scale of development (para 20)
CR12: West Side Major Opportunity Area	Strategic-scale development that makes significant contribution to providing for development needs (para 20(a)) and the pattern and scale of development (para 20)
CR13: East Side Major Opportunity Area	Strategic-scale development that makes significant contribution to providing for development needs (para 20(a)) and the pattern and scale of development (para 20)
SR1: Island Road Major Opportunity Area	Strategic-scale development that makes significant contribution to providing for development needs (para 20(a)) and the pattern and scale of development (para 20)
SR2: Land North of Manor Farm Road Major Opportunity Area	Strategic-scale development that makes significant contribution to providing for development needs (para 20(a)) and the pattern and scale of development (para 20)
SR3: South of Elgar Road Major Opportunity Area	Strategic-scale development that makes significant contribution to providing for development needs (para 20(a)) and the pattern and scale of development (para 20)
ER2: Whiteknights Campus, University of Reading	Campus spans the boundary with Wokingham Borough and therefore has cross-boundary implications (para 21)
ER3: Royal Berkshire Hospital	Hospital serves communities in adjoining authorities and therefore has cross-boundary implications (para 21)

- 4.5 We welcome any comments on whether the correct policies have been identified as strategic.

Q5: Do you agree with the list of strategic policies?

5. Cross-cutting policies

- 5.1 The following policies are proposed to be updated:
- CC2: Sustainable design and construction;
 - CC3: Adaptation to climate change;
 - CC4: Decentralised energy;
 - CC7: Design and the public realm; and
 - CC9: Securing infrastructure.
- 5.2 The following policies are considered to be up-to-date and are not proposed to be updated:
- CC1: Presumption in favour of sustainable development;
 - CC5: Waste minimisation;
 - CC6: Accessibility and the intensity of development; and
 - CC8: Safeguarding amenity.

Q6: Do you agree that we should update the cross-cutting policies listed?

CC2: Sustainable design and construction

- 5.3 This policy deals with sustainable design and construction requirements for the construction of new non-residential buildings and redevelopment and refurbishment of existing buildings to non-residential use. In light of RBC's aims to be a net-zero Borough by 2030 as well as recent and forthcoming changes to national policy through the Building Regulations, changes are required to ensure the highest level of sustainability possible. Other changes are needed to clarify elements of the policy that have arisen in [appeal](#) decisions, ensure water neutrality and deter unnecessary demolition.
- 5.4 The Government has recently adopted an interim update to Part L of the Building Regulations (June 2022) to require improved energy performance with regard to building fabric performance including limiting values for insulation and air tightness, as well as emissions rates for new buildings. This update is referred to as the interim Future Buildings Standard with respect to non-residential development. At the time of writing, the full standards (with more stringent requirements for building performance and limits on operational emissions from development) are expected to be adopted by 2025 in alignment with the UK target of achieving [net zero](#) by 2050.
- 5.5 Although updates to Part L are a welcome improvement, all development built to Part L standards will contribute to Reading's carbon emissions, albeit at a lower level than previously. Local Planning Authorities are permitted to implement standards improving on the limits set in the Building Regulations in order to drive proportionate local response to local and national climate action targets. Given that Reading will see a high level of growth in the coming years, failure to require high sustainable design and construction standards would result in the need for costly [retrofit](#) in the future and risk the Borough missing its target for net zero carbon emissions by 2030.

- 5.6 The existing policy approach requires [BREEAM](#)⁷ “very good” as a minimum, with a requirement for all major non-residential developments to achieve BREEAM “excellent.” There have not been particular difficulties in achieving these standards for most forms of building, although some applicants have reported difficulty in securing an assessor. Developments in Reading tend to already achieve high BREEAM scores as they are usually located in sites that are well-served by non-car transport modes. However, experience suggests that some forms of development have greater difficulty meeting standards, such as warehouse and schools. The policy should be amended to clarify that where requirements cannot be met, the highest possible standard must be achieved. It is no longer appropriate to require minor developments to meet BREEAM “Very Good” as a minimum, as this is now superseded by the interim requirements of Part L of the Building Regulations. Due to the difficulty in securing BREEAM assessors, a new policy approach could define its own limits for space heating demand and total energy demand, with an emphasis on fabric performance. BREEAM, or equivalent assessment methods, could remain an option for applicants.
- 5.7 Our current local plan approach does not address [embodied carbon](#). Analysing embodied carbon gives a more accurate estimate of the emissions released during different stages of development including raw material extraction, transportation, manufacturing and construction. These emissions account for a significant portion of total emissions. As required by other local planning authorities, including the London Plan, sustainability statements should include details of how embodied carbon is considered and reduced throughout the design process through a Whole Carbon Life Assessment. Additionally, as demolition is often a significant source of carbon emissions, a local approach should take a presumption against demolition. This is consistent with the presumption in favour of sustainable development within the [NPPF](#). Where major demolition is required, applicants should be required to divert 95% of construction waste away from landfill, as recommended in the London Plan 2021.
- 5.8 An existing Sustainable Design and Construction Supplementary Planning Document ([SPD](#)) is in place and the general principles, where in compliance with the proposed policy will continue to apply. The Government has announced its intention to eliminate the use of topic-based SPDs in the coming years. Therefore, an update to CC2 should include as much detail as possible to strengthen and future-proof the policy such that it could be applied sufficiently in the absence of a supporting SPD.
- 5.9 The following changes are proposed:
- In the final paragraph of the policy, the text should be changed to clarify that all development must achieve water neutrality, in which all major new developments would employ or contribute to water saving measures equivalent to the development’s water consumption. Applicants will also be required to adopt the ‘fittings approach’ as outlined within the Building Regulations, rather than a per capita consumption approach.
 - The first bullet point within the policy should be amended to state that applicants should achieve net-zero development defined as ‘a scenario in which the quantity of anthropogenic greenhouse gas emissions arising from the

⁷ BREEAM stands for Building Research Establishment Environmental Assessment Method, an accrediting body providing voluntary certification frameworks for assessing the sustainability of development.

development’s operational energy use on an annual basis is zero or negative, and where whole-life emissions are reduced through sustainable design measures. Net zero building status must be achieved through the application of the following energy hierarchy:

- Minimise and manage operational energy demand through building design, fabric performance and servicing measures.
- Use local energy resources (such as secondary heat) wherever possible to meet residual demands.
- Meet remaining residual energy demands by producing, storing and using renewable energy on-site.
- Monitor and report on energy performance.⁸
- The second bullet point should be amended to state that all non-residential development proposals must include an energy statement which confirms that proposals:
 - Can generate at least the same amount of renewable electricity on-site (and preferably on-plot) as they demand over the course of the year (regulated and unregulated) using a methodology proven to accurately predict post-occupancy performance; and
 - Achieve a site average space heating demand of 15-20kWh/m²/yr and a site average total energy demand of 70kWh/m²/yr. No unit shall exceed total energy demand of 90kWh/m²/yr, irrespective of the amount of on-site renewable production. (Total energy demand means the amount of energy used as measured by the metering of the building with no deduction for renewable energy generated on site).
- An additional paragraph should be added to define the requirements of the Energy Statement, including pre-built performance estimates and as-built calculations prior to occupation. Weight will be given to proposals which demonstrate a commitment to on-going monitoring post-occupation which can be clearly communicated to the occupier.
- An additional paragraph should be added to outline an “exceptional basis clause” which requires the highest possible standards in cases where the above points cannot be met for technical, viability or other policy reasons, such as heritage. In these cases, an applicant must demonstrate the extent to which the requirements can be met. For major developments of 1000 sqm or more, applicants must also either
 - Enter into a legal agreement to provide renewable energy infrastructure off-site equivalent to at least offsetting the additional energy requirements not achieved on site; or
 - Provide a financial contribution to the LPA of a value sufficient enough to offset the remaining performance not achieved on site; or
 - Demonstrate that the buildings will be connected to a decentralised energy network; or
 - Demonstrate that the proposal is compliant with BREEAM Outstanding or Excellent (or equivalent certification method).

⁸ This net-zero definition and mitigation hierarchy represents industry best-practice as defined by the UK Green Building Council.

- An additional paragraph should be added to state that demolition of an existing building should be accompanied by a full justification for the demolition and demonstrate how 95% of all construction waste will be diverted away from landfill.
- An additional paragraph should be added to require an embodied carbon assessment for all applications for new-build commercial floorspace of 5000m² or more. This assessment must demonstrate a score of less than 800kg/sqm of carbon can be achieved within the development for the substructure, superstructure and finishes.
- The supporting text should be amended to:
 - Refer to the Council's most recent Climate Emergency Strategy and Carbon Plan and to refer to the existing 2019 Sustainable Design and Construction SPD.
 - Amend the final sentence of paragraph 4.1.3 to refer to new metrics within the policy that stand alone from BREEAM for on-site renewables, space heating demand and total energy demand.
 - Omit paragraph 4.1.4.

5.10 **Alternative options:** Other options include:

- **Not to update the policy:** Although this approach would require improvements past the stated target emissions rate in the Building Regulations, it would rely on BREEAM standards when more ambitious standards could be achieved. Additionally, BREEAM “Very Good” is no longer appropriate, as it has been superseded by the updates to Part L and some applicants have expressed difficulty in securing a BREEAM assessment.
- **Omit the policy and rely on updates to Part L of the Building Regulations:** This would result some reductions in carbon emissions. The Building Regulations are the legally allowable poorest values and do not represent best practice. There is also often an energy performance gap whereby developers aiming for these targets fall short of meeting them post-occupancy. Additionally, there is uncertainty surrounding timescales for forthcoming updates to the Building Regulations. Should local policy fail to prescribe its own sustainability standards in line with local targets, progress toward net-zero would be delayed. Moreover, the exact definition of net-zero within the Future Buildings Standard remains to be defined through ongoing Government consultation. It is likely that “net-zero ready” as defined by the Future Buildings Standard will require approximately 75% emissions reduction relative to 2021 standards rather than 100% as it relies on full decarbonisation of the electricity grid.
- **Update the policy to require BREEAM “Excellent” of both major and minor non-residential development:** Although this approach would require improvements past the stated target emissions rate in the Building Regulations, it would rely on BREEAM standards when more ambitious standards could be achieved. This approach does not provide flexibility for applicants who wish to use certification schemes other than BREEAM.
- **Update the policy, but with less ambitious requirements for target emissions rate reduction:** The London Plan, for instance, requires a minimum improvement past the stated carbon emission rate standards, usually expressed as a 35% improvement of the target emissions rate. This would

result in an improvement, but not go as far towards achieving net-zero aims as the preferred approach.

Q7: Do you agree that we should update policy CC2 as described? Are there other changes that are required?

CC3: Adaptation to climate change

- 5.11 This policy aims to ensure that new developments adapt to the effects of climate change, for instance through orientation, shading, ventilation, planting and drainage.
- 5.12 The presumption in favour of sustainable development within the NPPF now includes greater emphasis on measures to mitigate climate change and adapt to its effects. This means that adapting to climate change is accorded greater significance.
- 5.13 In addition to greater emphasis within national planning policy, Reading Borough Council has published further local guidance that affords greater weight to climate change adaptation. These are summarised as follows:
- The Reading Climate Change Emergency Strategy (2020) identifies a number of actions with relevance to policy CC3, including an action to use green infrastructure including green walls, green roofs and planting to reduce carbon emissions and promote urban cooling (N20). The existing policy approach is very much in line with this action, but more detail will be provided in the forthcoming Biodiversity and Natural Environment SPD.
 - A Sustainable Design and Construction SPD was adopted in December 2019 and follow on from the policy approach in CC3. This does not require an update to CC3, but the policy should refer to this document.
 - The Reading Climate Change Adaptation Plan (2019) sets out key risks and opportunities for adaptation in Reading. It identifies higher risk areas within the Borough. This does not require an update to CC3, but the policy should refer to this document.
- 5.14 The following changes are proposed:
- Addition of reference to the Reading Climate Change Emergency Strategy (2020).
 - Addition of reference to the Sustainable Design and Construction SPD (2019).
 - Addition of reference to the Reading Climate Change Adaptation Plan (2019) and identification of higher risk areas within the Borough.
 - Additional language to acknowledge that strategies will continue to evolve during the Local Plan process.
 - Additional language to give greater weight to climate change mitigation.
- 5.15 **Alternative options:** The only other option identified is to not update the policy. This would result in a policy that does not refer to the most up-to-date strategies in place and does not afford appropriate weight to climate change mitigation measures, given the urgency of the climate emergency.

Q8: Do you agree that we should update policy CC3 as described? Are there other changes that are required?

CC4: Decentralised energy

- 5.16 This policy aims to ensure that opportunities for decentralised energy within major developments are identified and incorporated where possible, either through new provision or allowance for connection to an existing or future energy network.
- 5.17 The Reading Climate Emergency Strategy (2020) includes an action (E11) to work with developers to maximise district energy solutions in line with the Local Plan policies on decentralised energy, including establishing district heat, investigating the potential of rivers ground and aquifers in Reading for renewable heat and implementing heat pump schemes.
- 5.18 Additionally, new legislation will establish Heat Network Zoning. This will formally designate areas within the Borough for new heat networks and allow the local authority to enforce requirements within them. Further guidance is expected toward the end of this year.
- 5.19 The following changes are proposed:
- Incorporate references to the Climate Emergency Strategy and actions within;
 - Add language to strengthen the requirements (i.e. “must connect to a decentralised energy source unless this is not suitable, feasible or viable.”);
 - Incorporate further progress on establishing district heat networks; and
 - Refer to Heat Network Zoning.
- 5.20 **Alternative options:** The only other option identified is to not update the policy. Although this would continue to contribute to decentralised energy provision within the Borough, it does not refer to the most up-to-date government guidance or facilitate the establishment of Heat Network Zones in the coming years.

Q9: Do you agree that we should update policy CC4 as described? Are there other changes that are required?

CC7: Design and the public realm

- 5.21 This policy promotes high quality design outcomes through development management that maintain and enhance the character and appearance of the area in which it is located. Changes to this policy are considered to be necessary in light of the recent publication of the National Model Design Code and the forthcoming requirement for all local planning authorities to develop their own local design codes. Small changes are also needed to account for the NPPF’s increased emphasis on “beauty” and to ensure greater emphasis on green infrastructure and [biodiversity](#) due to the declaration of a climate emergency.
- 5.22 The Levelling Up and Regeneration Act requires local planning authorities to adopt local design codes. Until recently, design codes have usually been associated with specific sites. An authority-wide design code must be consistent with the principles set out in the National Design Guide⁹ and National Model Design Code¹⁰ and seek to reflect local character and the design preferences of local residents. RBC will seek to publish a local design code in the coming years and as such, Policy CC7 needs to be

⁹ [National design guide - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

¹⁰ [National Model Design Code - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

amended to provide the basis for the forthcoming code and to align our design objectives with those stated in the National Model Design Code.

5.23 The following changes are proposed:

- Change the text of the policy to reflect the three overarching aims and ten characteristics outlined in the National Design Guide and National Model Design Code as follows:
 - All development must be of high-quality design, employing characteristics to create, maintain and enhance physical character, nurture and sustain a sense of community and positively address environmental issues affecting the climate. Proposals will be assessed to ensure that the development makes a positive contribution within the following characteristics:
 - Context – enhances the surroundings based on a sound understanding of the features of the site and its surroundings and is responsive to local history, culture and heritage.
 - Identity – is attractive and distinctive, with a positive and coherent identity that suits the context, its history, how we live today and how we are likely to live in the future. Proposals should be visually attractive to occupants and other users with a strong focus on beauty as a result of high-quality architecture.
 - Built form – exhibits a coherent pattern of development that is compact and walkable, accessible to public transport, services and facilities with recognisable streets and other spaces that are easy to navigate, safe and accessible. Development should employ appropriate scale, architectural detail and materials.
 - Movement – is accessible and easy to move around for all, taking account of the diverse needs of its users and providing a genuine choice of sustainable transport modes. Development should promote activity and social interaction.
 - Nature – enhances and optimises nature by integrating existing and new natural features into a multifunctional network to support quality of place, biodiversity, water management and climate change mitigation.
 - Public spaces – creates safe, social and inclusive public spaces.
 - Uses – ensures uses are mixed and integrated, including a range of local services and facilities to support daily life and a mix of housing tenures and types.
 - Homes and buildings – creates homes and buildings which are functional, healthy and sustainable with good quality internal and external environments to promote health and well-being.
 - Resources – reflects efficient use of resources and resilience for the future by reducing resource requirement for land, energy and water and being adaptable overtime by reducing the need for redevelopment.
 - Lifespan – ensures development is made to last, robust and easy to use and look after, adapting to users’ changing needs and evolving technologies.

Applications for major developments should be accompanied by a design and access statement that deals with all matters listed above.

- The supporting text should be amended to:
 - Refer to the changes in the NPPF with regard to design and summarise Section 12: Achieving well-designed places.
 - Refer to and explain changes to legislation that will require the publication of local design codes.

5.24 **Alternative options:** Other options include:

- **Not to update the policy:** The only other option identified is to not update the policy. Although this would continue to contribute to positive design within the Borough, it does not refer to the most up-to-date government guidance or facilitate the adoption of a local design code in the coming years.

Q10: Do you agree that we should update policy CC7 as described? Are there other changes that are required?

CC9: Securing infrastructure

5.25 This policy ensures that development in Reading is accompanied by appropriate provision of infrastructure, services and facilities. It lists the range of infrastructure priorities in order of importance.

5.26 In Spring 2023, Government consulted on proposals for a new [Infrastructure Levy](#) which aims to reform the existing system of developer contributions ([Section 106](#) and the [Community Infrastructure Levy](#)). A further consultation on the drafting of those regulations is expected in due course. Changes are proposed to CC9 to future-proof the policy for any forthcoming legislation, to refer to the end of pooling restrictions for the spend of monies collected through Section 106 agreements and to emphasise the increasing importance of digital infrastructure. Finally, as the Government has announced its intention to phase out topic-based Supplementary Planning Documents and remove their status and weight in decision-making, changes should be made to incorporate any important existing elements of the Employment, Skills and Training SPD.

5.27 The following changes are proposed:

- In the fourth bullet point regarding economic development infrastructure, add language to refer to digital connectivity.
- At the end of the policy, a paragraph should be added to future-proof the policy for the forthcoming Infrastructure Levy. Depending on the progress of relevant regulations and guidance, the policy may need to be amended to allow for the Levy to be implemented. In particular, there may be a need to establish different routeways in terms of financial contributions from different sizes of development. However, these changes cannot be outlined until more information is known.
- The supporting text should be amended to:
 - Remove reference to the CIL regulations which places limits upon pooling Section 106 payments (paragraph 4.1.48);
 - Describe the new role of [Infrastructure Funding Statements](#) in setting spend priorities;

- Describe the forthcoming Infrastructure Levy and clarify that for the foreseeable future, infrastructure will continue to be funded through the current system;
- State that certain applicants must develop a site-specific Employment and Skills Plan (ESP) as stated in the existing Employment, Skills and Training SPD. Funding to deliver the ESP outcomes will be the responsibility of the developer working in consultation with the Council, its ESP delivery partner and relevant skills and employment delivery partners. This will be based on meeting a specified number of training, apprentice and up-skilling outcomes in both the construction phase and end-user phase. Supporting text may also include tables from the SPD that demonstrate how contributions will be calculated and which developments will pay, as well as tables in the SPD appendix specifying required benchmarks, outputs and employment density guidance.

5.28 **Alternative options** The only alternative identified is to not update the policy. Although spending priorities remain unchanged, this would result in a policy that is out-of-date as it fails to refer to the removal of Section 106 pooling restrictions, the new role of infrastructure funding statements, the forthcoming Infrastructure Levy and the growing importance of digital infrastructure.

Q11: Do you agree that we should update policy CC9 as described? Are there other changes that are required?

6. Built and natural environment

- 6.1 The following policies are proposed to be updated:
- EN4: Locally important heritage assets;
 - EN7: Local green space and public open space;
 - EN12: Biodiversity and the green network;
 - EN13: Major landscape features and areas of outstanding natural beauty; and
 - EN14: Trees, hedges and woodlands.
- 6.2 The following policies are considered to be up-to-date and are not proposed to be updated:
- EN1: Protection and enhancement of the historic environment;
 - EN2: Areas of archaeological significance;
 - EN3: Enhancement of conservation areas;
 - EN5: Protection of significant views with heritage interest;
 - EN6: New development in a historic context;
 - EN8: Undesignated open space;
 - EN9: Provision of open space;
 - EN10: Access to open space;
 - EN11: Waterspaces;
 - EN15: Air quality;
 - EN16: Pollution and water resources;
 - EN17: Noise generating equipment; and
 - EN18: Flooding and sustainable drainage systems.

Q12: Do you agree that we should update the built and natural environment policies listed?

EN4: Locally important heritage assets

- 6.3 This policy deals with buildings and structures that have significance as part of the built environment but which are not of such significance that they qualify for national protection as, for instance, listed buildings. Only small changes are considered to be needed to policy EN4, to ensure that it is as robust as possible, and to address uncertainties and issues that have arisen during [appeal](#) decisions.
- 6.4 The following changes are proposed:
- In the second paragraph of the policy, the wording should be brought into line with paragraph 201 of the [NPPF](#), as it could currently be argued that the wording in EN4 that benefits should “significantly outweigh” harm or loss goes further even than the approach to designated assets. This wording would be based on this paragraph of the NPPF;

- The policy text should be changed to refer to “*the decision-maker*” rather than “*the Council*” because the Council will not always be the decision-maker, for instance in the event of an appeal; and
- The supporting text should clarify that the policy is not intended to be applied to heritage assets with a national designation, such as listed buildings or buildings of townscape merit in a conservation area.

Q13: Do you agree that we should update policy EN4 as described? Are there other changes that are required?

- 6.5 **Alternative options:** The only alternative option identified is to not update the policy, which would likely lead to continued uncertainty about how to apply the policy in the context of national policy.

EN7: Local green space and public open space

- 6.6 This policy protects defined areas as either Local Green Space or Public Open Space, which will be protected from development.

Changes to existing spaces

- 6.7 There have been changes on the ground that have affected defined areas of Local green space and public open space, in particular through development. These mean that in practice it is considered necessary to revise the boundary of the defined areas to reflect the reality on the ground. These are summarised below, and in each case a map showing the proposed boundary change is in Appendix 1.
- A new primary school has been constructed on part of Mapledurham Playing Fields (EN7Nn). The proposal is therefore to remove this from the designated Local Green Space, which would reduce the total area from 10.86 ha to 10.35 ha.
 - A new pool and leisure facilities have been constructed at Palmer Park, and part of the car parking provision is on land within the designated Local Green Space. At the same time, land previously part of the car park now forms a public space in front of the new entrance. The proposal is therefore to remove the area now within the car park from the Local Green Space and add the new public space, which would reduce the total area very slightly from 16.07 ha to 16.06 ha.
 - Two developments are underway that affect Rivermead and Thameside Promenade (EN7Wp), identified as Local Green Space. A new leisure centre including a swimming pool is under construction at Rivermead, mainly on what was previously car park but including an element of the identified LGS, but some of the existing buildings will be demolished and this will result in the provision of additional public space. Meanwhile, a new secondary school at the former golf driving range is also under construction and this will result in the loss of some of the existing LGS, although much of the driving range site will change from the range to school playing fields. The proposal is to change the boundaries which will reduce the total area from 16.83 ha to 16.08 ha.
- 6.8 The other location where development has taken place within an identified area of open space under this policy is Kensington Park (EN7Wi), where a scout hut has been developed within the corner of the park. However, the new building is small and

is a replacement for an existing scout hut within the park that is part of the designation, so it is not considered that this necessitates any changes to the boundary.

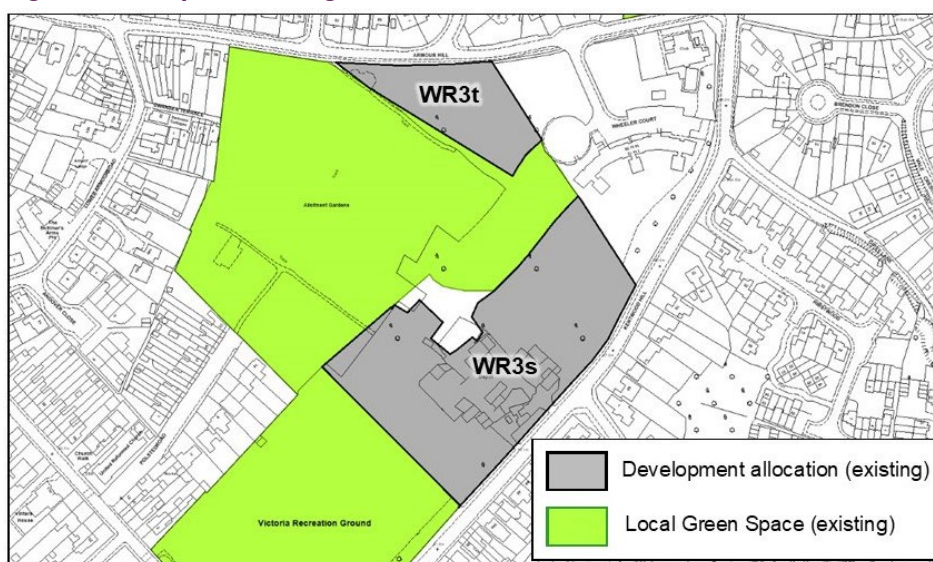
- 6.9 **Alternative options:** The only alternative option identified is to not update the policy to take changes on the ground into account, but this would mean that the boundaries are out of date.

Q14: Do you agree with the proposed amendments to the boundaries of the existing Local Green Spaces and Public Open Spaces?

Possible additional spaces

- 6.10 The [Call for Sites](#) exercise resulted in a proposal to add two existing development allocations (WR3s: Land at Kentwood Hill and WR3t: Land at Armour Hill) to the adjoining identified Victoria Recreation Ground and Kentwood Hill Allotments area of Local Green Space (EN7Wu). This would require the removal of the development allocations, and this is discussed further in section 12. A map of the existing allocations is below.

Figure 6.1: Map of existing allocations at Kentwood Hill and Armour Hill



- 6.11 However, even if the sites were no longer identified for development, designation as Local Green Space would also require justification in terms of the criteria for Local Green Space in the NPPF, namely that the space is:
- a. in reasonably close proximity to the community it serves;
 - b. demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - c. local in character and is not an extensive tract of land.
- 6.12 **Alternative options:** As well as the main options of leaving the designation as it is, or identifying the entirety of the two allocated sites as Local Green Space, an alternative option could be to identify everything apart from the built elements (essentially the builders merchants) as Local Green Space. However, essentially this

approach was in a [submission](#) version of a previous development plan, and the Inspector deleted it as it would not represent a comprehensive solution to the wider area.

Q15: Do you consider that Land at Kentwood Hill (WR3s) and Land at Armour Hill (WR3t) would qualify as Local Green Space?

6.13 A Playing Pitches Strategy was adopted in November 2021. Among its recommendations were a number of site-specific recommendations to protect certain pitches for playing field use in the Local Plan. Whilst some of these pitches fall within areas protected under EN7, there are 14 pitches which do not. These are as follows:

- Ibis Club;
- Madejski Stadium;
- John Madejski Academy;
- University of Reading Sports Park;
- Caversham Park;
- Prospect School;
- Reading School;
- Reading Girls School;
- Leighton Park School;
- Ranikhet Primary School;
- The Abbey School
- Scours Lane;
- Downing Road Playing Fields; and
- The Wren School

6.14 However, many of these are school sites, and existing policy OU1 of the Local Plan already contains provisions around protection of school playing fields. As such it is not considered that specific protection is needed. Caversham Park, Downing Road and the University of Reading Whiteknights Campus (which includes Sports Park) are covered by existing policies in the Local Plan that deal with any loss of existing open space. Madejski Stadium is a built leisure facility which would be covered by policy RL6.

6.15 This would leave the neighbouring sites of Scours Lane and Ibis Club, which provide an important recreational and leisure space and are not specifically covered by other policies. In our view, this would meet the criteria for Local Green Space designation as set out in NPPF paragraph 102 in terms of it being “(b) *demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife*” (emphasis added). It is therefore proposed that this be designated as a Local Green Space. A map is included within Appendix 1 (figure A1.4).

6.16 **Alternative options:** Other options include:

- **Do not update the policy to add the Ibis Club and Scours Lane site:** This approach could result in an important playing pitch that is highlighted in the

Playing Pitches Strategy not being specifically protected, albeit that it would still have general protection under policy EN8.

- Identify all additional sports pitches within the Playing Pitches Strategy as Local Green Space: This would result in a duplication of policy, and, in some cases, subtle differences in emphases of policies covering the same site, which would not provide certainty and clarity.

Q16: Do you agree that Ibis Club and Scours Lane be designated as Local Green Space?

Summary

6.17 The following changes are proposed:

- That policy EN7 and the proposals map be changed to incorporate amendments to existing spaces and a new space at Ibis Club and Scours Lane.

6.18 **Alternative options:** See previous paragraphs.

EN12: Biodiversity and the green network

6.19 This policy aims to ensure that [biodiversity](#) in Reading is protected and enhanced wherever possible. This includes the protection of sites of identified importance, as well as the establishment of a green network across the town, as well as preventing the net loss of biodiversity on site and achieving a net gain wherever possible.

6.20 Biodiversity is one of the areas where the context has changed most significantly since the Local Plan was adopted. The Environment Act 2021 introduces new requirements and responsibilities regarding biodiversity, in particular a mandatory 10% biodiversity net gain (BNG) on development sites that comes into force for all but small sites in January 2024 and for small sites in April 2024. Alongside this are other measures, such as the production of Local Nature Recovery Strategies and the introduction of conservation covenants as a way of securing improvements.

6.21 In addition, a Reading Climate Emergency Strategy was published in 2020, followed by Biodiversity Action Plan in 2021, both of which contained relevant actions that should be considered within the update to the policy.

Biodiversity Net Gain

6.22 There is a need for EN12 to set out a strategy for how the new provisions of the Environment Act will be approached, in terms of extent of BNG and location and priorities for provision.

6.23 Some authorities are seeking to use planning policies to require BNG at higher levels than the mandatory 10% levels, for instance 20%. The Council's initial intention is that, in this case where there is no experience of applying this new requirement, it is preferable to initially stick to the mandatory level, but would like your views on whether there is scope for this to be increased, albeit that doing so would require viability testing alongside other policy requirements of the plan.

Q17: Do you agree with the proposed level of biodiversity net gain to be sought?

- 6.24 The general expectation will be that BNG is delivered on-site if possible, but in cases where there needs to be off-site delivery, the nature of Reading Borough may cause some issues. There are no established schemes to provide BNG credits within Reading, and, although these may emerge over time, the urban nature of the Borough is likely to limit the potential credits available. This means that, particularly in the early stages, some off-site provision may need to be delivered outside Reading. Although the metric already favours off-site provision closer to the development location, the Council’s intention is that only provision within or in close proximity to Reading is likely to be acceptable. At this stage, a 10 km buffer is suggested.
- 6.25 In addition, there is likely to be a need to provide guidance on the types of location where off-site provision will be preferred. In the long term, the production of Local Nature Recovery Strategies will help to guide towards the best strategic opportunities for biodiversity improvements. However, these are still in production for the relevant areas (including Berkshire) and, as a short-term measure before the LNRS is prepared, it is suggested that [Biodiversity Opportunity Areas](#) (BOAs) are a reasonable substitute. There are two BOAs that extend into Reading, namely Kennet Valley East and West Reading Woodlands, and their extent is shown on Figure 4.4 of the existing Local Plan.
- 6.26 Finally, there are other elements in how statutory BNG is to be applied that need to be covered by policy. The metric excludes ‘[irreplaceable habitat](#)’ because its loss should not be justified, but it does mean that the policy needs to ensure that this is protected in its own right. Also, there will be some crossover with our existing policy that seeks BNG wherever possible, and this includes some sites which have a zero existing value under the metric, in particular some brownfield sites. It needs to be clarified that we are seeking BNG on all sites (above a ‘de minimis’ level that excludes householders and sites of less than 25 sq m) irrespective of whether the site can deliver 10% improvement under the Act.

Q18: Do you agree with the proposed approach to off-site Biodiversity Net Gain provision?

Q19: Do you have any other comments on how Biodiversity Net Gain is to be addressed?

Incorporating actions from other strategies

- 6.27 The Climate Emergency Strategy identifies a number of actions relating to wildlife corridors, as follows:
- Identifying wildlife corridors (N11) (including identifying primary and secondary routes);
 - Assessing the quality of wildlife corridors (N12);
 - Managing the impact of development areas on wildlife corridors (N13).
- 6.28 The Local Development Scheme identifies that a Biodiversity and Natural Environment [SPD](#) is due to be produced, and this is likely to be the best vehicle to consider this level of detail, as the high-level policy already covers the key areas. Work on the SPD is continuing alongside the update, and, if a need for an amendment emerges from that work, it can be incorporated in the draft.

- 6.29 The Biodiversity Action Plan identifies another set of actions relevant to this update but that not already addressed, as follows:
- Assess planning applications in terms of their impact on soils;
 - Ensure that, as a minimum, new development does not increase light spillage over rivers;
 - To ensure that any new landscaping adjacent to watercourses is predominantly native and wildlife friendly; and
 - To require the re-naturalisation of the river bank when new development is adjacent to it.
- 6.30 These elements can all be included within an updated policy.

Q20: Do you agree with the proposed additions to policy EN12 as a result of the Biodiversity Action Plan?

Summary

- 6.31 The following changes are proposed:
- That the policy make clear that ‘irreplaceable habitat’, which is not covered by the BNG metric, will be protected alongside formal designations;
 - That the policy refer to the mandatory requirement and reference how this will relate to all sites including those which have a zero value under the metric;
 - That the de minimis requirements below which existing BNG requirements be brought into line with statutory BNG, i.e. to exclude developments on land below 25 sq m and householder applications;
 - That an indication of requirements in terms of off-site compensation, e.g. a minimum 10 km distance from the Borough, be added, as well as directing off-site provision towards areas identified in Local Nature Recovery Strategies (LNRS) where possible, and towards Biodiversity Opportunity Areas until such time as a LNRS is in place;
 - That reference be added to protecting important soils;
 - That reference be added to avoiding light spillage over rivers;
 - That new landscaping next to rivers should be native and wildlife friendly; and
 - That renaturalisation of the riverbanks should be required for relevant applications.
- 6.32 ***Alternative options:*** Other options include:
- ***Not to update the policy:*** This option is not appropriate as it would not take account of the new 10% Biodiversity Net Gain requirements, and would lead to confusion and uncertainty about how these requirements are to be applied and how they would relate to the existing EN12 provisions.
 - ***Increase the on-site Biodiversity Net Gain requirement to 20%:*** This approach could be considered if it could be accommodated within the viability of the whole plan, but at this stage it is considered to be preferable to implement the policy at the statutory level until there is more experience of operating it.

- **Not include any spatial requirements for off-site BNG:** This approach would allow developers to provide off-site BNG anywhere where credits can be secured. This would mean that there is no guarantee that enhancements are anywhere within the local area (albeit the metric does penalise this to an extent).

EN13: Major landscape features and areas of outstanding natural beauty

- 6.33 This policy deals primarily with five major landscape features that span significant areas of Reading (the Thames Valley, the Kennet and Holy Brook Meadows, the West Reading Wooded Ridgeline, the East Reading Wooded Ridgeline and the North Reading Dry Valleys and Chilterns Escarpment). No changes are proposed to the extent of these areas or how the policy works for these features.
- 6.34 However, there is a process underway led by Natural England to review the boundary of the Chilterns Area of Outstanding Natural Beauty ([AONB](#)), which currently abuts the Reading Borough boundary adjacent to Caversham Heights but does not include any land within Reading. The Council is involved in this review, and it is expected to report in 2024. If the AONB boundary is amended to include any land within Reading, the policy will need to be expanded to deal with any proposals that fall within the AONB, taking account of both national policy and policy of adjoining authorities within the Chilterns AONB, in particular South Oxfordshire.
- 6.35 The following change is proposed:
- Should any land within Reading be identified as part of the Chilterns AONB as a result of the ongoing review, the policy should be expanded to ensure that any development within the AONB conserves and where possible enhances its character and natural beauty.
- 6.36 **Alternative options:** The only alternative option identified is to not update the policy, which will fail to take account of the latest position.

Q21: Do you agree that, in the event of land in Reading being identified for inclusion within the Chilterns AONB, we should update policy EN13 as described? Are there other changes that are required?

EN14: Trees, hedges and woodlands

- 6.37 This policy aims to protect existing trees, hedges and woodlands where they are of importance and ensure that new tree planting takes place within development sites.
- 6.38 Since the Local Plan was adopted, policy and legislation around trees, hedges and woodlands has continued to evolve. At a national level, the Environment Bill has introduced a number of new requirements including 10% Biodiversity Net Gain, whilst the NPPF has been strengthened with regards trees. At a local level, the Council's new Tree Strategy was adopted in 2021 that included ambitious proposals for tree cover as well as more detail on the planting necessary and a spatial identification of the areas most in need of additional planting. The Tree Strategy is not a local development document, and therefore reflection of its provisions in an updated policy EN14 will give greater weight to ensuring they are reflected in developments.
- 6.39 The following changes are proposed:

- The first paragraph should be expanded to refer to the headline ambitions of the Tree Strategy, in particular that canopy cover be increased to 25% by 2030 and that no ward should have a canopy cover below 12%.
- The policy should give more spatial direction, in line with the Tree Strategy, by placing particular emphasis for tree planting on the treed corridors (including the main roads, railways, rivers and Green Links), low canopy cover wards, Air Quality Management Area and areas of high treescape value such as wooded major landscape features and conservation areas¹¹;
- The content of the NPPF, in particular referring to creation of tree-lined streets, should be reflected in EN14;
- Some of the more detailed elements of the Tree Strategy, in particular prioritising large canopy species wherever possible to maximise the canopy cover benefits and contributing to overall diversity of the tree stock, should be referred to in the policy;
- The policy should give further emphasis to protecting and securing the long-term future of vitally-important [ancient](#) and [veteran trees](#);
- There should be cross references introduced to the importance of aligning planting with other priorities such as biodiversity net gain and Local Nature Recovery Strategies.

6.40 **Alternative options:** Other options include:

- **Not to update the policy:** This option would leave the policy as it is. It would fail to incorporate important elements of the Tree Strategy and would fail to maximise its potential to address the Climate Emergency.
- **Require a minimum canopy cover level:** Some plans require a minimum tree cover on development sites, for instance 20% or 30%. This is not considered appropriate in Reading because the sites are extremely varied in their potential for planting, with many town centre sites being developed at a high plot coverage leaving less room for planting.

Q22: Do you agree that we should update policy EN14 as described to take account of the Tree Strategy and other matters?

¹¹ See the Tree Strategy ([Reading Borough Council Tree Strategy, March 2021](#)), in particular Appendices 2 and 3.

7. Employment

- 7.1 The following policies are proposed to be updated:
- EM1: Provision of employment development; and
 - EM2: Location of new employment development.
- 7.2 The following policies are considered to be up-to-date and are not proposed to be updated:
- EM3: Loss of employment land; and
 - EM4: Maintaining a variety of premises.

Q23: Do you agree that we should update the employment policies listed?

EM1: Provision of employment development

- 7.3 This policy aims to identify the level of employment development required and deal with the impacts that a higher level of employment than planned for could have on the demand for housing.
- 7.4 In terms of offices, EM1 identified a need for a net gain of between 53,000 and 112,000 sq m. What has actually happened since the policy was adopted is that office space has reduced by around 74,000 sq m. Whilst the amount of space with planning permission remains high, some of this will only be delivered in the long term or may not be delivered at all.
- 7.5 For industrial and warehouse space, EM1 identified a need for an additional 148,000 sq m. There has been an increase in space of around 20,000 sq m since the plan was adopted, but this leaves a substantial amount still to be delivered.
- 7.6 The evidence on which these levels of need were based is now more than five years old. In addition, it predated Covid, which is likely to have significantly affected working patterns and the need for additional space. For this reason, office need at least is unlikely to have increased. However, national policy clearly expects the need for economic development uses to be assessed. As yet this evidence has not been produced. When it is, the proposal is to update policy EM1 to provide for any revisions to the assessed level of need insofar as is possible. It will also need to consider whether there is scope to accommodate unmet need from elsewhere where appropriate.
- 7.7 The following changes are proposed:
- That the policy be updated to refer to updated needs for office and industrial and warehouse uses, taking account of the most up-to-date information; and
 - That consideration be given to any opportunity to meet unmet need for employment uses from other authorities.
- 7.8 **Alternative options:** The only alternative option identified is to **not update the policy**, which would not address development needs as required by national policy.

Q24: Are you aware of anything else that should be factored into an update to policy EM1?

EM2: Location of new employment development

- 7.9 This policy identifies the main locations for major office and industrial or warehouse development. In doing so, it identifies a number of Core Employment Areas.
- 7.10 Work on identifying the level of need for employment floorspace, as outlined in relation to policy EM1, will also have implications for policy EM2. The extent of the Core Employment Areas identified will be those necessary to ensure that the floorspace needing to be retained is not lost to other uses, thus undermining economic growth. As such, there may be boundary changes proposed to those areas. At this stage, it is not possible to outline what those changes would be. However, other than the definition of individual areas, the wording of the policy is not proposed to change significantly.
- 7.11 **Alternative options:** The only alternative option identified is to **not update the policy**, which would potentially result in a mismatch of supply and demand and could either result in employment needs being met, or could protect space that is not required to meet future needs.
- 7.12 Options around individual sites within Core Employment Areas that have been put forward for development are set out for the individual sites in Appendix 2.

Q25: Do you have any comments on how policy EM2 should be updated?

8. Housing

8.1 The following policies are proposed to be updated:

- H1: Housing provision;
- H2: Density and mix;
- H3: Affordable housing;
- H4: Build to rent schemes;
- H5: Standards for new housing;
- H6: Accommodation for vulnerable people;
- H7: Protecting the existing housing stock;
- H8: Residential conversions; and
- H14: Suburban renewal and regeneration.

8.2 The following policies are considered to be up-to-date and are not proposed to be updated:

- H9: House extensions and ancillary accommodation;
- H10: Private and communal outdoor space;
- H11: Development of private residential gardens;
- H12: Student accommodation; and
- H13: Provision for gypsies and travellers..

Q26: Do you agree that we should update the housing policies listed?

H1: Housing provision

8.3 This policy sets out the amount of housing to be provided in Reading over the plan period and identifies the scale of the shortfall and how it is to be addressed. The existing provision figure is 689 per year up to 2036. This is based on an identified need for 699 year including a shortfall of 10 [dwellings](#) per year to be met outside Reading's boundaries. More than half of the identified need was for [affordable housing](#).

8.4 The number of homes to be provided is the most significant question that the Partial Update must address, and the main reason that an update is required. The approach to calculating housing need has changed significantly since the Local Plan was [submitted](#), and reliance on existing calculations of need is not an option. There is now a national [standard methodology](#) for calculating housing need which is set out in [Planning Practice Guidance](#)¹². Use of this methodology, on the basis of the most recent information in 2023¹³, results in a need in Reading for **877 homes per year** up to 2041.

8.5 It is important to note that this standard methodology includes a 35% uplift for the authorities that cover the main parts of the 20 largest urban areas in England. Reading is one of those urban areas, which means that the housing need is

¹² [Housing and economic needs assessment - GOV.UK \(www.gov.uk\)](#)

¹³ Based on household growth of 5,067 between 2023 and 2033 and median workplace-based affordability ratio of 8.52

increased by 35%. The Council's view is that this divorces the standard methodology from a basis in local need, and the Council has therefore commissioned its own evidence to understand what the need for homes would be using an alternative methodology, rooted in local need. The work is underway and will be published in due course, but initial results from this work identifies this locally-based need figure as being around **735 homes per year** up to 2041, with a significant proportion of this remaining affordable housing.

- 8.6 At the same time, the Council has been updating its assessment of the capacity of sites within the Borough to accommodate development needs, including for housing. The existing Local Plan was supported by a Housing and Economic Land Availability Assessment, and it is this work that is being updated to support the Partial Update. The assessment has not been finalised and published, but initial results suggest that there may be capacity in Reading to accommodate **approximately 800 homes per year** up to 2041.
- 8.7 ***The key figures to be aware of in setting a housing provision target to 2041 are therefore as follows:***
- ***Standard methodology figure (as at 2023) – 877 homes per year;***
 - ***Local assessment of housing need using an alternative methodology – around 735 homes per year;***
 - ***Initial estimates of maximum capacity within Reading – around 800 homes per year.***
- 8.8 A shortfall in Reading meeting its own needs therefore only arises if the standard methodology is used. According to initial estimates, the locally-based level of need of 735 homes per year can be accommodated within Reading's boundaries. However, under the standard methodology figures, a shortfall of around 1,000 to 1,400 homes that cannot be delivered in Reading would arise. The agreement with other authorities in the Western Berkshire Housing Market Area (Bracknell Forest, West Berkshire and Wokingham) that Reading's unmet needs be accommodated within the area relates only for the need as set out in the existing policy and does not apply to unmet needs against the standard methodology. Unmet needs would need to be considered afresh.
- 8.9 The proposed approach is that the H1 housing provision figure should reflect the capacity likely to be available, i.e. approximately 800 homes per year (subject to a more detailed assessment of capacity in the Housing and Economic Land Availability Assessment) for a total of 14,400 to 14,850. The proposed position is therefore that the housing provision planned for is 9-12% higher than genuine local needs, and this therefore does not give rise to any unmet need that is required to be accommodated within other authorities.
- 8.10 Existing capacity on sites with planning permission or existing allocations is around 11,200 homes, including an allowance for small site windfalls of less than 10 dwellings. Meeting an annual provision figure of 800 dwellings per year would mean identifying sites for an additional approximately 1,700 dwellings, either on new sites or by changes to capacity of existing identified sites.
- 8.11 The following changes are proposed:

- That the housing provision figure in H1 be amended to reflect available capacity to 2041, expected to be in the region of 800 homes per year for a total of around 14,400 homes, but to be refined through more detailed capacity work;
- That reference to a shortfall being accommodated within neighbouring authorities be removed from the policy and supporting text; and
- That information on housing supply in the supporting text be updated with the most recent position.

8.12 **Alternative options:** Other options include:

- **Not to update the policy:** National policy is clear that changes to the way that housing need is calculated will be a reason to update the policy, and this approach would not therefore be compliant with national policy.
- **Housing provision of 699 per year:** This option would provide for the full level of need as assessed for the existing local plan, including eliminating any unmet needs. However, as above, this approach would not comply with national policy.
- **Housing provision of 877 per year:** This option would provide for the full level of need under the standard methodology. However, work on capacity within Reading indicates that it would not be possible to accommodate this in full, which would mean a reliance on exporting unmet need elsewhere. In addition, it would fail to take account of the exceptional circumstances of Reading's local need being demonstrably lower than the figure generated by the standard methodology.
- **Housing provision of 735 per year:** This option would provide for the locally-assessed level of housing need. However, capacity work has indicated that there is an opportunity to provide above this level, meaning that this option would not help to substantially boost housing delivery.

Q27: Do you have any comments on the amount of housing that Reading should be planning for?

Q28: Do you have any comments on how the issue of a shortfall in identified needs is proposed to be addressed?

H2: Density and mix

- 8.13 This policy sets out guidance for the most appropriate residential density in different areas and on different sites. It also requires larger developments outside centres to deliver family housing to help meet the significant need. Furthermore, it requires consideration of the potential for delivering self-build homes. These elements need consideration separately.

Density

- 8.14 In terms of density, existing policy H2 bases this on a number of criteria, informed by indicative density ranges for different types of area (town centre, urban and suburban). These density ranges were originally derived from now replaced national policy.

- 8.15 The [NPPE](#) (paragraph 125) now states that there should be minimum density standards for city and town centres and other areas well served by public transport, and that these should seek a significant uplift in the average density of residential areas, unless there are strong reasons why this would be inappropriate. Minimum density standards should also be considered for other areas.
- 8.16 The difficulty in putting such approaches into practice is that the appropriate density can vary quite widely from location to location. This is particularly the case in town centres which also tend to be the main locations for existing heritage assets, as well as there being other constraints. This means that minimum densities either need to be set at a relatively low level, or they need to be significantly caveated where there are particular sensitivities, such as heritage assets.
- 8.17 The existing indicative densities from the policy are set out in Table 8.1 along with the existing average densities in different types of area, as well as the average density that has been achieved in new build residential development over the last ten years. This shows that, in new developments, town centre densities have very substantially exceeded the policy minimum in recent years, urban densities have been very much at the top of the policy range, whilst suburban densities have been exactly at the mid-point of the range.

Table 8.1: Residential density in policy and as achieved (dwellings per hectare)

Area type	Existing average density	Indicative density range from policy H2	Average density achieved 2013-2023
Town centre ¹⁴	199 dph	Above 100 dph	334 dph
Urban ¹⁵	77 dph	60-120 dph	116 dph
Suburban ¹⁶	32 dph	30-60 dph	45 dph

- 8.18 The following changes are proposed:
- That, to reflect national policy, the emphasis of the policy be changed to specify usual minimum densities for different types of area subject to potential exceptions;
 - That the following usual minimum densities be used:
 - Town centre – 200 dwellings per hectare;
 - Highly accessible urban sites (district and local centres and sites close to a high frequency public transport stop) – 100 dwellings per hectare;
 - Other urban sites – 70 dwellings per hectare
 - Suburban sites – 40 dwellings per hectare.
 - That a set of criteria for considering exceptions be included, to include matters such as the presence of heritage assets or sensitive landscapes or

¹⁴ Town centre areas tend to be high density and mixed use (often mixed vertically) with a significant amount of commercial floorspace

¹⁵ Urban areas are medium to high density, and are characterised by a variety of types of development, including: residential areas featuring significant amounts of flats and terraced housing, usually without dedicated private outdoor space or with small gardens; dedicated employment or retail park areas; and mixed areas along key routes or in district centres

¹⁶ Suburban areas are generally residential in character, are composed of detached or semi-detached homes, or some larger terraced homes, with gardens, as well as larger areas of public open space

townscapes, unacceptable impacts on residential amenity and any impacts on delivering the necessary mix of sizes of dwelling.

8.19 **Alternative options:** Other options include:

- **Do not update this part of the policy:** This approach would fail to accord with national policy, particularly in the centre of Reading.
- **Set higher minimum densities in line with average achieved densities:** As shown in table 8.1, the average achieved densities over the last ten years are higher than the proposed policy minima. However, setting a minimum at this average level would fail to take account of the different circumstances from site to site and would risk having a considerable negative effect on local character.

Q29: Do you agree with the proposed update to policy H2 to incorporate minimum densities?

Size and type

- 8.20 The policy places an emphasis on delivering family housing of three or more bedrooms, which had been identified as representing about half of the total housing need in Reading. Delivering family housing in Reading is difficult due to the emphasis on high density town centre sites, and there is no doubt that the policy as it stands is not delivering the size of accommodation needed. Based on the needs identified in the Strategic Housing Market Assessment, Reading needed 3,558 new homes of three or more bedrooms between 2013 and 2023, but actually delivered 1,125, only around a third of the need, despite overall housing delivery broadly in line with identified needs. Whilst it was never expected that existing policy H2 could meet all family housing needs alone, clearly more needs to be done.
- 8.21 Work is underway on updating the needs for family homes as part of the wider housing needs, but this is not expected to show a significantly different picture in that the family housing needs are not being met.
- 8.22 There is therefore a need to increase the proportion of family housing sought across the board, ensuring that sites in all locations make a contribution, but that those outside centres, where the scope to provide family accommodation is greatest, are genuinely family housing-led.
- 8.23 There is clearly a potential conflict with policies that apply a minimum residential density in that it is easier to meet such policies by delivering smaller homes. There is a need for such conflicts to be resolved in favour of the provision of family housing.
- 8.24 The following changes are proposed:
- That the minimum proportion of 3- or more bed homes required on sites of ten or more dwellings outside centres be increased from 50% to 67% (one third) unless this is not achievable;
 - That, notwithstanding the minimum proportion, the number of 3- or more bed homes on sites of all sizes should be maximised;
 - That a minimum percentage of three-bed dwellings within district and local centres of 20% be applied;
 - That there also be increases in family housing provision in Central Reading (see discussion on policy CR6); and

- That the policy explicitly state that, in the event of conflict between meeting minimum densities and delivery of family housing, family housing will take priority.

8.25 **Alternative options:** Other options include:

- **Do not update this part of the policy:** This approach would continue the existing position, which is that family homes of three bedrooms or more are delivered at a rate significantly below what is required, thus failing to address needs in full.
- **Seek higher provision of family accommodation on relevant sites outside centres (up to 100%):** This approach might deliver some additional family housing, although it might be restricted by the limited number of such sites that occur outside centres. However, this approach would be less flexible and risks failing to deliver mixed and balanced communities.

Q30: Do you agree with the proposed increased focus on family housing in policy H2?

Self-build

8.26 The Council has a statutory duty to grant enough permissions for self- and custom-build homes to meet the level of need identified on the statutory Self Build Register. Securing new self-build homes from private developments in Reading can be very difficult, in particular because so much of the development that takes place is flatted, where self-build is not practicable. The Council’s priority for its own housing land will remain the delivery of much needed affordable housing as opposed to self-build.

8.27 At the end of the most recent ‘base period’¹⁷, there were 51 entries on Part 1 of the Register. Part 1 comprises those that have passed a local connection test, and the statutory duty to grant permissions applies to Part 1 only. Typically the Council only permits around 5-6 self-build dwellings each year, but there are around 10-11 additions to the Register annually. The policy is not therefore currently meeting the statutory duty.

8.28 The following change is proposed:

- That the wording regarding self-build be amended to state that developments of ten or more houses ‘should’ make provision for self-build wherever viable and achievable, as opposed to ‘will consider’ making provision.

8.29 **Alternative options:** Other options include:

- **Do not update this part of the policy:** This approach would not assist in meeting the statutory duty to grant sufficient permissions.
- **Specify a minimum proportion of self-build, for instance 10%:** This approach is likely to lead to an overprovision of homes against the needs on the register, which stands at 51, and is likely to be more difficult to achieve on some of the smaller developments where it might only involve one or two plots.

Q31 Do you agree with the proposed update to policy H2 to strengthen the wording on self-build?

¹⁷ Base periods are a way of monitoring demand on the Self Build Register, and run from 31st October in one year to 30th October the following year. The most recent base period was 31st October 2022 to 30th October 2023.

H3: Affordable housing

- 8.30 This policy aims to ensure that housing development makes an appropriate contribution to the delivery of [affordable housing](#), either through delivery on site for larger developments, or through a financial contribution for smaller developments. It requires the following contributions:
- Developments of 10 or more dwellings – 30%
 - Developments of 5-9 dwellings – financial contribution equating to 20%
 - Developments of 1-4 dwellings – financial contribution equating to 10%
- 8.31 The need at the time of the existing Local Plan was assessed as 406 affordable dwellings per year up to 2036, forming the majority of the overall housing need. Work is underway on assessing the up-to-date level of need, but the need is likely to remain substantial, and it remains clear that securing additional affordable housing is essential.
- 8.32 Whilst viability assessment of the policy requirements of the whole plan will need to be undertaken, there is not otherwise any intention to reduce the amount of affordable housing sought or the threshold above which a contribution is expected. However, there are a number of more detailed matters that need to be considered.

Tenure

- 8.33 The existing policy delegates the specific tenures of affordable housing sought to the Affordable Housing [SPD](#). An Affordable Housing SPD was adopted in March 2021, which set tenure expectations as follows:
- Affordable rented accommodation at ‘Reading affordable rent’ levels – at least 62% of the affordable housing to be provided; and
 - Affordable home ownership ([shared ownership](#) or another product) – maximum 38%.
- 8.34 Reading affordable rent means rental levels capped at 70% of market rates and is intended to be affordable to those in housing need in Reading.
- 8.35 It is proposed that the updated policy H3 incorporate the expected affordable housing tenures. This would give full policy weight to the expectations, and would maximise clarity for applicants about what will be sought. This will be particularly important with the deletion of SPDs in the Levelling Up and Regeneration Act.
- 8.36 The Council’s starting point will be to continue to seek at least 62% of provision at Reading affordable rent levels, because this tenure best meets our priority needs. This will be subject to choices about how the new [First Homes](#) tenure is incorporated (see following section). However, we are mindful of the need for an updated viability assessment of the whole plan’s requirements, which will need to be refreshed before the Partial Update is finalised.

First Homes

- 8.37 A Written Ministerial Statement of 24th May 2021 introduced First Homes as a new affordable housing product. First Homes are discounted homes for sale to first time buyers. The minimum discount to qualify as a First Home is 30%. The WMS stated that a minimum of 25% of on-site affordable units secured by [Section 106](#) should be

for First Homes. It also stated that a minimum of 25% of off-site financial contributions secured should be used for the provision of First Homes.

- 8.38 The existing Local Plan policy H3 pre-dates First Homes and therefore does not require First Homes as part of the affordable housing contribution. In order to comply with national policy, the update to H3 will need to include at least 25% First Homes as part of the tenure split of the required on-site affordable housing.
- 8.39 The Council's strong view is that the inclusion of First Homes should not result in any reduction in the delivery of homes at 'Reading affordable rent' levels, because that is the product that most clearly addresses the extensive affordable housing need in the Borough. This would mean that the 25% First Homes would be delivered as part of the existing 38% for affordable home ownership, which would generally mean replacing some of the shared ownership.
- 8.40 National policy allows local planning authorities to apply a greater discount than 30% for First Homes, up to 40 or 50% based on local evidence. The Council does not intend to increase the level of discount, because doing so will affect the viability of the development in a way that would either reduce the overall number of affordable homes or would reduce the number at Reading affordable rent, neither of which would do enough to deliver the genuinely affordable homes needed.
- 8.41 There are other eligibility criteria that national policy allows local planning authorities to apply for accessing First Homes, as follows:
- Lower income cap;
 - Prioritisation of [key workers](#);
 - Local connection test;
 - Other criteria such as employment status.
- 8.42 Regarding the income cap, the baseline eligibility requirement is that those eligible for First Homes should have a combined household income below £80,000. However, local authorities are able to set a lower income cap if it can be justified on the basis of lower local first-time buyer incomes. It is not considered likely that Reading's first time buyer incomes will be lower than the national average, and it is not therefore currently proposed to set a lower income cap.
- 8.43 National guidance encourages local planning authorities to prioritise key workers (defined locally based on the most pressing needs of the local area). This is considered to be helpful in ensuring that First Homes genuinely meet some of the most pressing local needs, albeit it will add complexity to relevant Section 106 agreements.
- 8.44 Guidance allows a local connection test to be set. The Council intends to apply a local connection test, because this will ensure that it is local affordable housing need that is being addressed. There is already a local connection test that is applied for considering additions to the Self Build Register, and this forms a potential model.
- 8.45 National guidance allows local authorities to set other criteria, and one suggested is around employment status. At this point, the Council does not propose to apply additional eligibility criteria over and above those previously discussed.

Q32: Do you agree with the proposals for incorporating First Homes into policy H3 as described?

Deferred contributions

- 8.46 In a case where a developer has demonstrated that it is not viable to provide policy-compliant levels of affordable housing at the time that permission is granted, it is nevertheless possible that market conditions will change by the time that the development is completed. For this reason, as set out in the adopted Affordable Housing SPD¹⁸, it is current practice for a deferred contributions mechanism to be included in a Section 106 agreement that ensures that, in the event of a change in market conditions that makes a greater contribution viable, a proportion of increased profits are secured for affordable housing. However, this current practice is not reflected in the wording of policy H3, which has led to issues at [appeal](#), and it is therefore proposed that the update includes reference to a deferred contribution. The detail of how this is secured would continue to be outlined in the SPD.

Q33: Do you agree with the inclusion of a requirement for a deferred contribution in policy H3?

Where on-site provision cannot be made

- 8.47 There have been recent instances where it has been difficult for developers to identify a [Registered Provider](#) to take on on-site affordable housing units, particularly where the number of units is small. The usual approach in Section 106 agreements is that, in the event that a Registered Provider cannot be found, the units should be offered to the Council in the first instance, with a financial contribution payable as a last resort. However, this is not currently referred to in policy H3, and it is proposed that the H3 update incorporate this provision.

Q34: Do you agree with the inclusion of the proposed approach to instances where a Registered Provider cannot be found to take on affordable housing units?

Summary

- 8.48 The following changes are proposed:
- The required tenure split should be set out in the policy as defined in the Affordable Housing SPD;
 - That a requirement for 25% First Homes should be included within the required tenure, as part of the 38% affordable sale requirement, at the 30% discount specified in national policy, unless doing so reduces the overall level of affordable housing that could be achieved, in which case First Homes may be replaced by another affordable home ownership product such as shared ownership;
 - That a local connection test for access to First Homes be applied and that key workers be prioritised;
 - That the policy be amended to specify that a deferred contribution will be required where the affordable housing contribution falls short of policy requirements; and
 - That the policy be amended to require that a cascade mechanism be used where a Registered Provider cannot be found to take on agreed on-site

¹⁸ [Affordable Housing SPD, adopted March 2021 \(reading.gov.uk\)](#)

affordable housing, with homes being offered to the Council in the first instance and finally a financial contribution sought.

8.49 **Alternative options:** Other options include:

- **Do not update the policy:** This would mean that the policy continues to rely on certain matters such as tenure and deferred contributions being delegated to the Affordable Housing SPD, and will mean that there is a risk of lesser weight being applied to these elements as a result. It would also, through the lack of inclusion of First Homes, fail to comply with national policy.
- **Incorporate First Homes into the tenure required following the approach suggested in national guidance:** This approach prioritises the 25% First Homes and then would split the remainder according to the existing 62/38 tenure split, which would mean 25% First Homes, 47% Reading affordable rent and 28% other affordable home ownership including shared ownership. This is not considered acceptable as it would result in less than half of affordable housing addressing Reading’s most pressing needs, for rented accommodation.
- **Not to include First Homes within the specified tenure:** This approach would continue to apply the existing required tenure from the SPD and would not include First Homes. However, this would not comply with national policy, and would require evidence that Reading is an exceptional case in terms of greater need for other affordable home ownership products than First Homes.
- **To include First Homes at a greater discount of 40 or 50%:** National guidance specifies that it is possible to apply a greater discount than the minimum 30% to First Homes. However, doing so is likely to significantly alter the viability of affordable housing provision and ultimately is likely to lead to lower on-site delivery overall.

H4: Build to rent schemes

8.50 This policy sets out criteria for consideration of proposals for [build to rent](#) housing, which are purpose-built private rented developments held in a single ownership. Build to rent has become an increasingly important source of housing in Reading, with many of the larger developments recently completed or under construction in Central Reading being build to rent.

8.51 Build to rent will continue to have a role to play in housing development in Reading, and it will be important to retain a criteria-based policy largely along the lines of the existing policy. The identified need for an update relates simply to lessons learned from greater experience in dealing with such proposals in Reading since the policy was drafted.

8.52 One of the main benefits of build to rent is in security of tenure. The policy as it stands requires minimum three-year tenancies with a six-month break clause in the tenant’s favour. These are expectations that do not apply to other forms of residential, and are generally in line with policy expectations in other areas. However, with build to rent expected to be such an important sector, and buying a home being out of reach for so many, it is important to make sure that the security of tenure is maximised insofar as is possible. Therefore the Council would like to explore the potential to ensure that these tenancies are able to be rolled forward for a further tenancy period wherever possible, and an update to the policy could cover this. This is something that would need to be secured within the Section 106 agreement.

- 8.53 The following change is proposed:
- That point 2 of the policy be amended to state that a further three-year tenancy period should generally be offered at the end of the tenancy.
- 8.54 **Alternative options:** The only alternative option identified is to **not update the policy**, which, whilst it has been operating reasonably well in recent years, would miss the opportunity to maximise the security of tenure.

Q35: Do you agree with the proposed update to policy H4 around rolling tenancies forward?

H5: Standards for new housing

- 8.55 This policy ensures that new build housing within Reading meet minimum standards pertaining to internal space, water efficiency, carbon emissions and accessibility and adaptability.
- 8.56 The Government has sought to consolidate the wide range of standards required for new housing by encouraging reliance on minimum requirements within the Building Regulations for most matters with a small number of optional standards above Building Regulations minima. Optional standards include internal space, water efficiency and accessibility and only apply where included in the Local Plan.
- 8.57 Additionally, a revised National Planning Policy Framework (NPPF), accompanying Ministerial Statement published in July 2018 and Government response to the revised NPPF consultation states that local authorities are not restricted in their ability to require energy efficiency standards above the Building Regulations. It also reiterated that the Government remains committed to delivering a Future Homes Standard through the building regulations which will deliver highly energy-efficient, zero carbon homes in the coming years.
- 8.58 The Government has announced its aim for the Building Regulations to require all new build homes to be highly energy-efficient and zero carbon ready by 2025. An interim standard was adopted in 2022. However, the detailed consultation for further improvements has been delayed. Moreover, the existing interim standards fail to meet industry best practice for building performance and do not address the energy performance gap (whereby as-built units do not meet efficiency and emissions standards stated during application stage). Therefore, it is considered appropriate that the Council continue to require energy efficiency standards through its Local Plan in order to reach the target of a net-zero Borough by 2030. The policy should be future-proofed to avoid any conflict with the forthcoming Future Homes Standard.
- 8.59 In order to avoid reliance on the changing standards in the Building Regulations, it is considered that the Local Plan should assess space heating demand, total energy use and use of on-site renewables, rather than an emission rate benchmarked from Part L of the Building Regulations. Officers have also highlighted that relying on the [Standard Assessment Procedure \(SAP\)](#) within the Building Regulations significantly underestimates actual space heating demand and can allow applicants to build to lower energy-efficiency standards. Energy metrics are seen to be more technically robust and designed to lead to better building outcomes with a focus on fabric efficiency in the first instance.

- 8.60 It should also be noted that the Future Homes Standards will require that all new-build homes be “zero-carbon ready” meaning they can perform as operationally zero carbon without the need for [retrofit](#) once the electricity grid has been fully decarbonised. Full decarbonisation is estimated by National Grid to be achievable by 2035, but only with significant and urgent energy reform by Government. Therefore, reliance on the forthcoming Future Homes Standard may fail to deliver zero carbon homes within the Borough and would certainly fall short of meeting our aims for zero carbon emissions by 2030.
- 8.61 Stringent requirements for space heating demand, total energy use and use of on-site renewables should reduce the need for financial contributions to account for residual emissions. In cases where requirements cannot be achieved on-site, off-site provision, connection to a decentralised energy network or a financial contribution may be required. The method for calculating this contribution should be reviewed in light of inflation, the decreasing carbon intensity of the grid and the relationship between the contribution and the cost of the actual projects needed to offset such emissions. Further work will be commissioned as the Local Plan review progresses.
- 8.62 It should be noted that the emissions rate and fabric energy efficiency standards prescribed within the Building Regulations are the legally allowable poorest values. They do not represent best practice and many as-built developments do not perform to the standards approved at application stage. As such, post-occupancy evaluation of major schemes is particularly important. Failure to perform post-occupancy evaluation or to meet intended thermal performance, air tightness and energy use may result in enforcement action.
- 8.63 In terms of water efficiency, there remains clear evidence from the Environment Agency that the Thames River Basin is a water-stressed area. Given this, the highest possible standards should continue to be applied through H5 in order to meet demand management aims. It is considered that this is best achieved through a fittings approach (as described in CC2 above and as outlined in the Building Regulations) and through requiring developers to seek water neutrality, if possible.
- 8.64 The existing policy does not account for [embodied carbon](#) or the environmental impacts of demolition and replacement.
- 8.65 In terms of accessibility and adaptability, the main thrust of the policy should still apply but may be amended to account for any additional needs that arise as a result of the Housing Needs Assessment.
- 8.66 In terms of the nationally-described space standard, this should continue to be applied to all new-build housing outside the Central Area. Sufficient internal space is essential to the quality of life for residents. In the centre of the town, this may not always be possible and could limit development, but the national standard provides a useful point of reference for applicants.
- 8.67 The following changes are proposed:
- Paragraph b should be amended to require all new-build housing be designed to achieve water neutrality, if possible. As a minimum, all new-building housing

must be built to the higher water efficiency standard under the Building Regulations, using a fittings approach¹⁹.

- Paragraphs c and d should be amended to require all new-build housing to be [net zero carbon](#) and also designed to achieve the following (calculated using a methodology proven to accurately predict a building’s actual energy performance):
 - Site average space heating demand of 15-20kWh/m²/annum;
 - Site average of total energy demand less than 35kWh/m²/annum;
 - No single dwelling unit to have a total energy demand in excess of 60kWh/m²/annum, irrespective of amount on on-site renewable energy production; and
 - On-site renewable energy generation to match total energy use over the course of a year, with a preference for roof-mounted solar PV.
- New paragraph to state that achievement of the targets is to be achieved through adherence to the following energy hierarchy:
 - Minimise and manage operation energy demand through building design, fabric performance and servicing measures.
 - Use local energy resources (such as secondary heat) wherever possible to meet residual demands.
 - Meet remaining residual energy demands by producing, storing and using renewable energy on-site.
 - Monitor and report on energy performance.²⁰
- An additional paragraph should be added to define the requirements of the Energy Statement, including pre-built performance estimates and as-built calculations prior to occupation. Weight will be given to proposals which demonstrate a commitment to on-going monitoring post-occupation which can be clearly communicated to the occupier.
- An additional paragraph should be added to outline an “exceptional basis clause” for major development of 10 dwellings or more which requires the highest possible standards in cases where the above points cannot be met for technical or other policy reasons, such as heritage. In these cases, an applicant must either:
 - Enter into a legal agreement to provide renewable energy infrastructure off-site equivalent to at least offsetting the additional energy requirements not achieved on site; or
 - Provide a financial contribution to the LPA of a value sufficient enough to offset the remaining performance not achieved on site (a minimum contribution of £5K and a maximum contribution of £15K per dwelling unit will be required); or
 - Demonstrate that the residential units will be connected to a decentralised energy network; or

¹⁹ Maximum fittings consumption under the optional requirement level is outlines in Table 2.2 in [Document G of the Building Regulations](#)

²⁰ This definition represents industry best-practice as defined by the UK Green Building Council.

- Demonstrate that the proposal is compliant with [Passivhaus](#) Plus or Premium or Passivhaus Classic supplemented with evidence meeting on-site renewable generation requirements (or equivalent accreditation scheme that is demonstrated to be consistent with the requirements of the policy).

In cases where the points cannot be met for reasons of viability, an Energy Statement must set out in full the degree to which the requirements can be met in order to enable the development to become viable.

- A new paragraph should be included to require applications of 50 or more dwellings to submit an Embodied Carbon Assessment that demonstrates a score of less than 750-800kg/sqm of carbon can be achieved within the development for the substructure, superstructure and finishes.
- Paragraph f should be amended to account for any increase in the need for wheelchair using dwellings that arise as a result of the Housing Needs Assessment.
- The supporting text should be amended to:
 - Amend paragraph 4.4.37 to the Ministerial Statement published in July 2018 and Government response to the revised NPPF consultation that state that local authorities are not restricted in their ability to require energy efficiency standards above the Building Regulations.
 - Amend paragraph 4.4.44 to describe importance of and requirements for water neutrality, as well as the fittings approach.
 - Amend paragraph 4.4.45 to refer to RBC's Carbon Strategy and Climate Change Emergency.
 - Amend paragraph 4.4.46 to remove reference to previous carbon requirements benchmarked from the Building Regulations and include reference to an updated calculation for determining contributions for offset of residual emissions.
 - Add paragraph to provide further detail with regard to embodied carbon assessments.
 - Add paragraph to provide further detail with regard to demolition justification.

8.68 **Alternative options:** Other options include:

- **Not to update the policy:** Although the existing policy approach specifies zero carbon homes, it does not outline more robust standards with regard to total energy use and space heating demand. It also fails to require on-site renewables to match total energy use. In practice, major developments generally comply with the policy, but many applicants achieve a 35% improvement on-site plus a contribution to account for remaining emissions.
- **Omit the policy and rely on updates to Part L of the Building Regulations:** This would result some reductions in carbon emissions. The Building Regulations are the legally allowable poorest values and do not represent best practice. There is also often an energy performance gap whereby developers aiming for

these targets fall short of meeting them post-occupancy. Additionally, there is uncertainty surrounding timescales for forthcoming updates to the Building Regulations. Should local policy fail to prescribe its own sustainability standards in line with local targets, progress toward net-zero would be delayed. Moreover, the exact definition of net-zero within the Future Homes Standard remains to be defined through forthcoming Government consultation.

- **Update the policy, but with less ambitious requirements for target emissions rate reduction:** The London Plan, for instance, requires a minimum improvement past the Building Regulations, usually expressed as a 50% improvement of the target emissions rate. This is accompanied by requirements for applicants to report energy use intensity and space heating demand in order to address an as-built performance gap. This would result in an improvement, but not go as far towards achieving net-zero aims as the preferred approach.

Q36: Do you agree that we should update policy H5 as described? Are there other changes that are required?

H6: Accommodation for vulnerable people

- 8.69 This policy deals with proposals for specialist residential accommodation for vulnerable people, including older people and people with disabilities. It identifies the amount of residential care accommodation required over the plan period.
- 8.70 National policy has recently strengthened to emphasise the importance of providing accommodation for older people. The 2021 Census demonstrates that Reading, in common with many other areas, has an ageing population. Work is underway on assessing the needs for housing across Reading, and this includes the needs of particular groups requiring housing, including elderly people and those in need of care. This will generate a need figure for residential care that will replace the existing figure of 253 bedspaces.
- 8.71 There has been substantial provision of [extra care](#) housing in recent years in Reading, to the extent that there is considered to be an over-supply, and as such there is no identified need for further extra care. The policy should be amended to make this clear.
- 8.72 In addition to any additional need, there is also the issue of a great deal of existing provision being within older buildings that do not always meet modern standards, and there will therefore be a need to replace some of this over the plan period.
- 8.73 A recent issue that has arisen with specialist housing for older people is that the age threshold for eligibility is relatively low, often 55. There are clearly instances where people of that age are in need of specialist accommodation, and it is appropriate that those needs are met. At the same time, there are concerns that this may result in general residential developments that simply act to exclude younger people and therefore do not provide mixed and balanced communities. It is proposed to amend the policy to state that ages of eligibility below 65 will need to be robustly justified.
- 8.74 The following changes are proposed:
- That the level of need for residential care identified in ongoing housing needs work be included to replace the existing identified need;

- That it be emphasised that there is not considered to be any further needs for extra care;
- That the need to replace some existing provision with more modern accommodation be noted; and
- To state that ages of eligibility for what would otherwise be standard C3 dwellinghouses will need to be robustly justified.

8.75 **Alternative options:** Other options include:

- **Not to update the policy:** This would fail to take account of the latest information on needs for residential care bedspaces.
- **To move to a criteria-based policy only without specific needs identified:** This would fail to plan appropriately for the needs for housing for vulnerable people, including the older people that are specifically identified in national policy.

Q37: Do you agree that we should update policy H6 as described?

H7: Protecting the existing housing stock

8.76 This policy ensures that the existing housing stock within Reading is not reduced as a result of development that would result in a net loss of homes. This remains an important principle given the extent of housing need in Reading, because the cumulative effect of individual proposals that result in a net loss of housing makes it more difficult to meet these needs.

8.77 However, there are some circumstances where this policy is proving to be insufficiently flexible and is preventing other objectives being achieved. For instance, there have been proposals to convert two existing smaller flats into one larger house, which would have the benefit of increasing family housing supply, which, as seen in relation to policy H3 is a considerable challenge in Reading. As it stands, this would in principle be in conflict with policy H7.

8.78 The following changes are proposed:

- That the policy be reworded so that the ability to apply exceptional circumstances apply to the whole of the policy, not just the first sentence; and
- That additional exceptional circumstances be added to paragraph 4.4.56 to include creating new family accommodation of three or more bedrooms and improving accommodation that does not meet expected standards due to, for instance, inadequate internal space.

8.79 **Alternative options:** The only alternative option identified is to **not update the policy**, which would make it more difficult to provide additional family housing than the proposed policy approach.

Q38: Do you agree that we should update policy H7 as described to allow for increases in family housing?

H8: Residential conversions

8.80 This policy sets out the criteria for considering conversions from houses to flats or to [houses in multiple occupation \(HMOs\)](#). There are a number of factors to take into

account, but one of the main elements is a threshold approach to proposals for HMOs within an area in which the Council has put [Article 4 directions](#) in place that mean that small HMOs (between three and six unrelated occupants) need planning permission.

- 8.81 The reasons why this policy was considered to be in need of update related to issues that have arisen during its implementation. There was confusion about how the threshold approach should be applied, in terms of whether the total number of residential properties referred to residential buildings or individual dwellings. There was also a lack of clarity about how the policy requirement that a proposal “*would not, either individually or cumulatively, unduly dilute or harm an existing mixed and sustainable community through the significant loss of single family housing*” would be judged outside the Article 4 direction area, where the policy threshold did not apply. There were also issues that arose during appeals that needed to be addressed, in particular whether it is acceptable for bathrooms to be located at upper floors above habitable rooms and whether a conversion to HMO represented a loss of family accommodation, which can be addressed through revisions to the policy.
- 8.82 Some of the above issues were partly addressed by the adoption of a new Residential Conversions SPD in March 2023. This set out a new approach to HMO proposals outside the Article 4 area, including a new threshold approach. It also made a number of important clarifications and updates. Having recently consulted on and produced that SPD, it makes sense to bring the main policy points into the policy itself.
- 8.83 The following changes are proposed:
- That the policy be reworked to include the approach outlined in the Residential Conversions SPD for proposals for HMOs or flat conversions outside the Article 4 area. This approach consists of:
 - A threshold approach whereby the proportion of houses within a 50m radius of the application site that are in use as HMOs or which have been converted to flats would exceed 50%²¹;
 - A presumption against the granting of permission for an HMO where the area falls within the 30% most deprived areas in England according to the Indices of Multiple Deprivation; and
 - Consideration of any other evidence of dilution or harm of a mixed and sustainable community.
 - That the policy be clarified to ensure that the number of residential properties from which the total proportion is calculated when the threshold approaches are applied relates to residential buildings as opposed to residential dwellings;
 - That a situation where a residential dwelling is sandwiched between two HMOs be avoided, and resolving existing situations of this type should be given weight in planning decisions;

²¹ For full details of how this approach works in practice, please see the Residential Conversions SPD - [Residential Conversions SPD Adopted March 2023 \(reading.gov.uk\)](#)

- That the clause around inappropriate stacking and location of rooms between units be strengthened to ensure that the location of bathrooms above habitable rooms be avoided wherever possible; and
- That the supporting text make clear that a loss of family accommodation cannot be mitigated through the provision of a dwelling as part of the development unless that dwelling has three bedrooms or as many bedrooms as the dwelling to be converted, whichever is lesser.

8.84 **Alternative options:** Other options include:

- **Not to update the policy:** Not to update the policy would be fairly similar to the proposed approach, as the changes proposed are generally already dealt with in the Residential Conversions SPD. However, it would miss an opportunity to bring the documents into line, and may mean more difficulties in implementation if the updates do not have full [development plan](#) policy weight.
- **To apply the same threshold approach outside the Article 4 direction area:** This option would mean taking the same approach, i.e. a threshold of 25% HMOs, outside the Article 4 area as well as inside. Whilst having the advantage of consistency, this would not address the main issue outside the Article 4 area which is that there tend to be many more conversions to flats than to HMOs.
- **To apply a lower threshold outside the Article 4 direction area:** Lower thresholds, due to the fact that they also take flat conversions into account, risk resulting in the situation of policy being more restrictive towards HMOs outside the Article 4 area (the area of greatest concern) than within it.
- **To use a criteria-based approach outside the Article 4 direction area:** This approach would fail to provide sufficient certainty as to whether a proposal for conversion is likely to be acceptable.

Q39: Do you agree that we should update policy H8 as described to address issues with implementation of the policy?

H14: Suburban renewal and regeneration

- 8.85 This policy sets out the approach to proposals for renewal and regeneration of Reading's suburban residential areas to improve the environment and housing stock and deliver more homes. The policy is currently relatively general and does not identify specific locations.
- 8.86 Following on from successful regeneration of Dee Park, work is ongoing on whether there are any significant opportunities to undertake further estate regeneration within Reading's areas of local authority housing that will deliver a net increase in dwellings, in particular for affordable housing. At this stage, it is not possible to be more specific, but the intention is that an updated policy in a draft Partial Update in 2024 may be able to identify clearer opportunities for such regeneration.
- 8.87 The following change is proposed:
- That specific opportunities for suburban renewal and regeneration be identified within the policy when the work to identify those opportunities has been undertaken.
- 8.88 **Alternative options:** Other options include:

- **Not to update the policy:** Although this business as usual approach would not be detrimental, it would miss an opportunity to provide enhanced support to appropriate specific proposals for suburban renewal and regeneration as they emerge.
- **To identify detailed proposals for areas including housing provision figures:** Whilst this approach would give the greatest certainty, the proposals are unlikely to be at the stage where high levels of detail can be given by the time the plan is submitted. As such, this approach would be unhelpful.

Q40: Do you agree that we should update policy H14 as described to identify specific opportunities for suburban renewal and regeneration?

New policy: Co-living

- 8.89 [Co-living](#) is a form of communal residential accommodation which falls within a single management regime and which offers more communal facilities and amenities than a House in Multiple Occupation (HMO), and is generally on a relatively large scale (often considered to be 50 bedrooms). On-site facilities can differ from scheme to scheme, but may include working spaces, cinema and gym as well as an on-site events programme. Most of the published information sees co-living as being primarily geared towards younger people used to living communally after studying. We have not yet dealt with any applications for co-living in Reading, but it is becoming more common in some of the UK's largest towns and cities and we expect to see proposals in Reading within the plan period.
- 8.90 In planning terms, co-living is a sui generis use, i.e. not falling within a specific use class, which means that it will always require planning permission. There is no policy specifically on co-living in the Local Plan, and this will make it more difficult to determine proposals when they are submitted.
- 8.91 There are a number of issues that require consideration in developing a new policy:
- There needs to be a way of distinguishing co-living from other proposals that might be similar in some ways such as HMOs, [student accommodation](#) and apart-hotels, and the key elements are likely to be the extent of the communal space and facilities provided, the length of the tenancies and the degree of single management;
 - The likelihood is that co-living will compete with general housing provision for a limited number of sites, in particular in the town centre. This will make it more difficult to meet our housing needs, in particular for on-site affordable housing;
 - Other authorities covering larger cities have generally set a minimum size of 50 bedrooms to qualify as co-living. However, Reading is a smaller market and it is likely that proposals here may well also be generally smaller. A lower threshold is expected to be appropriate.
 - Reading's adopted Affordable Housing SPD specifies that co-living will be expected to provide a financial contribution to affordable housing. This approach is consistent with other authorities' approaches and should be continued.
- 8.92 It is proposed that a new policy on co-living be included:

- That sets a minimum of 20 bedrooms to qualify as co-living;
- That restricts proposals for co-living to sites that are not already identified for general residential, as allocations or permissions, unless the co-living element would be in addition to the anticipated residential;
- That otherwise generally directs co-living to town centre or edge-of-centre sites where parking is not required;
- That sets out standards with which co-living proposals are expected to comply, including a minimum amount of communal space (suggested 5 sq m per resident), minimum room sizes (suggested 20 sq m), a minimum tenancy period (suggested 3 months) and a management plan, with the latter two secured by Section 106 agreement;
- That requires a financial contribution towards affordable housing, the basis for which is as already set out in the Affordable Housing SPD²².

8.93 **Alternative options:** Other options include:

- **No policy:** This would mean that there would be no policy basis upon which to determine anticipated proposals for co-living, which leads to uncertainty and potential lack of consistency.
- **Criteria-based policy:** This approach would omit any preference in terms of location and be based around criteria such as internal size standards and affordable housing. However, it is likely to lead to situations where co-living competes with much-needed general housing for scarce sites, and makes it more difficult to meet Reading’s housing needs.
- **Negative approach to co-living:** This approach could seek to discourage co-living overall on the basis that it is not a form of accommodation for which a particular need has been identified. A policy could, for instance, require an applicant to identify a need. This approach is considered to be unnecessarily restrictive of an approach which could have some benefits in providing opportunities for housing for younger people in particular;
- **Positive approach to co-living:** This approach could seek to encourage co-living proposals within Reading on the basis that it is a more innovative approach to meeting needs. However, co-living is an untested product in Reading, and it is therefore considered that, before the implications are known in full, such an approach would not be appropriate.

Q41: Do you agree that a new policy on co-living should be included?

Q42: Do you agree with the proposed policy direction on co-living?

²² This is calculated on the basis that four bedspaces equates to one dwelling, so for instance a co-living proposal of 80 bedspaces would need to make a financial contribution equivalent to a 20 dwelling proposal.

9. Transport

- 9.1 The following policies are proposed to be updated:
- TR1: Achieving the transport strategy;
 - TR2: Major transport projects;
 - TR4: Cycle routes and facilities; and
 - TR5: Car and cycle parking and electric vehicle charging.
- 9.2 The following policy is considered to be up-to-date and is not proposed to be updated:
- TR3: Access, traffic and highway-related matters.

Q43: Do you agree that we should update the transport policies listed?

TR1: Achieving the transport strategy

- 9.3 This policy aims to ensure that developments contribute to meeting the objectives of the transport strategy and contribute towards sustainable transport measures. It is therefore intrinsically linked to the latest Transport Strategy. A Draft Transport Strategy 2040 has been subject to consultation during 2023.
- 9.4 Much of the broad strategic direction of the Transport Strategy, in terms of prioritising public transport, walking and cycling, remains within the latest version. However, the objectives, listed in the supporting text to the policy, have changed, and that part of the supporting text needs to be revised to reflect the latest objectives. The objectives in the Draft Transport Strategy are as follows:
- Creating a clean and green Reading: Provide transport options to enhance quality of life, reduce emissions and improve air quality to create a carbon neutral town;
 - Supporting healthy lifestyles: Create healthy streets to encourage [active travel](#) and lifestyles, improve accessibility to key destinations and increase personal safety;
 - Enabling sustainable and inclusive growth: Enable sustainable growth and connect communities so that everyone can benefit from Reading's success;
 - Connecting people and places: Promote the use of sustainable modes of transport by providing attractive alternatives to the private car, helping to provide a transport network that is fast, affordable, connected and resilient; and
 - Embracing smart solutions: Use technology to manage the network efficiently and allow informed travel choices, whilst enabling Reading to become a smart, connected town of the future.
- 9.5 Therefore, whilst there is some continuity from previous strategies, there are also some important new or enhanced elements, such as reference to healthy streets and smart solutions, as well as cross-referring to the Climate Emergency. TR1 is intended to be future-proof in the sense that the wording of the policy should not need to be updated whenever a new Transport Strategy is adopted. However, the latest version of the Transport Strategy is intended to be a long-term strategy running to 2040, close to the 2041 end date of the Partial Update, and it is therefore considered worth

incorporating these objectives into the policy so that they have significant policy weight.

9.6 The following changes are proposed:

- That the new objectives from the latest Transport Strategy be incorporated into the policy; and
- That cross-references to the Transport Strategy in the supporting text, in particular paragraph 4.5.1, be updated.

9.7 **Alternative options:** The only alternative option identified is to **not update the policy**, which would mean that the Local Plan and Transport Strategy are not as integrated as they could be.

Q44: Do you agree with the proposed updates to policy TR1 to reflect the Transport Strategy 2040?

TR2: Major transport projects

9.8 This policy identifies the major transport projects from the Local Transport Plan and prioritises their implementation. Some of these projects have been completed. In addition, a Draft Transport Strategy 2040 containing new projects has been subject to consultation during 2023, and there is therefore considerable need to update this policy.

9.9 The following projects listed in the policy have been completed and should be removed from the policy and proposals map:

- Cow Lane Bridges were completed in April 2019;
- Green Park Station and Interchange opened in 2023; and
- The elements of the National Cycle Network Route 422 were completed in 2020.

9.10 The M4 Smart Motorway project referred to in the supporting text and shown on the proposals map has also been completed insofar as land is required in Reading.

9.11 [Crossrail](#), also referred to in the supporting text, has also been completed, and Elizabeth Line services are now running to Reading. The safeguarding direction which effects a considerable amount of land close to the railway line does not appear to have been formally revoked, but in practice there is not considered to be a need to continue to show this land on the proposals map and refer to it in the text.

9.12 Some of the existing projects listed in TR2 require updated references. For instance, what was formerly referred to as Mass Rapid Transit is now Bus Rapid Transit, whilst the Draft Transport Strategy refers to Cross Thames Travel rather than Crossing of the River Thames.

9.13 There are also a number of new projects within the Draft Transport Strategy that would potentially affect the use of land and therefore need to be outlined in TR2. These include:

- Transport corridor multi-modal enhancements;
- Inner Distribution Road multi-modal enhancements;

- Oxford Road multi-modal enhancements;
- Reading station interchange enhancements;
- Tilehurst station upgrade;
- Town and local centre public space enhancements;
- Strategic pedestrian routes;
- Local pedestrian routes;
- Strategic and town centre cycle routes;
- Shinfield Road active travel improvements;
- Bath Road/Castle Hill active travel improvements;
- London Road active travel improvements;
- Local cycle routes;
- Cycle parking [mobility hubs](#) and facilities; and
- Smart city initiatives.

9.14 For the most part, these projects will be shown on a new overall map to replace figure 4.8 of the existing plan. However, in some cases, such as Reading Station interchange enhancements and Tilehurst station upgrade, there may be a need for a more specific boundary to be shown on the proposals map.

9.15 The following changes are proposed:

- That Cow Lane Bridges, Green Park Station and Interchange and NCN 422 be removed from the policy and proposals map;
- That reference to M4 Smart Motorway and Crossrail be removed from the supporting text and the proposals map; and
- That the projects listed in paragraph 9.13 be added to the policy and shown on an updated overall Major Transport Schemes map, and the extent of safeguarded land shown on the proposals map where necessary.

9.16 **Alternative options:** The only alternative option identified is to **not update the policy**, which would mean that the policy is significantly out of date, and would make it more difficult to achieve some of the transport projects within the Transport Strategy.

Q45: Do you agree with the proposed updates to policy TR2 to show an updated list of major transport projects?

TR4: Cycle routes and facilities

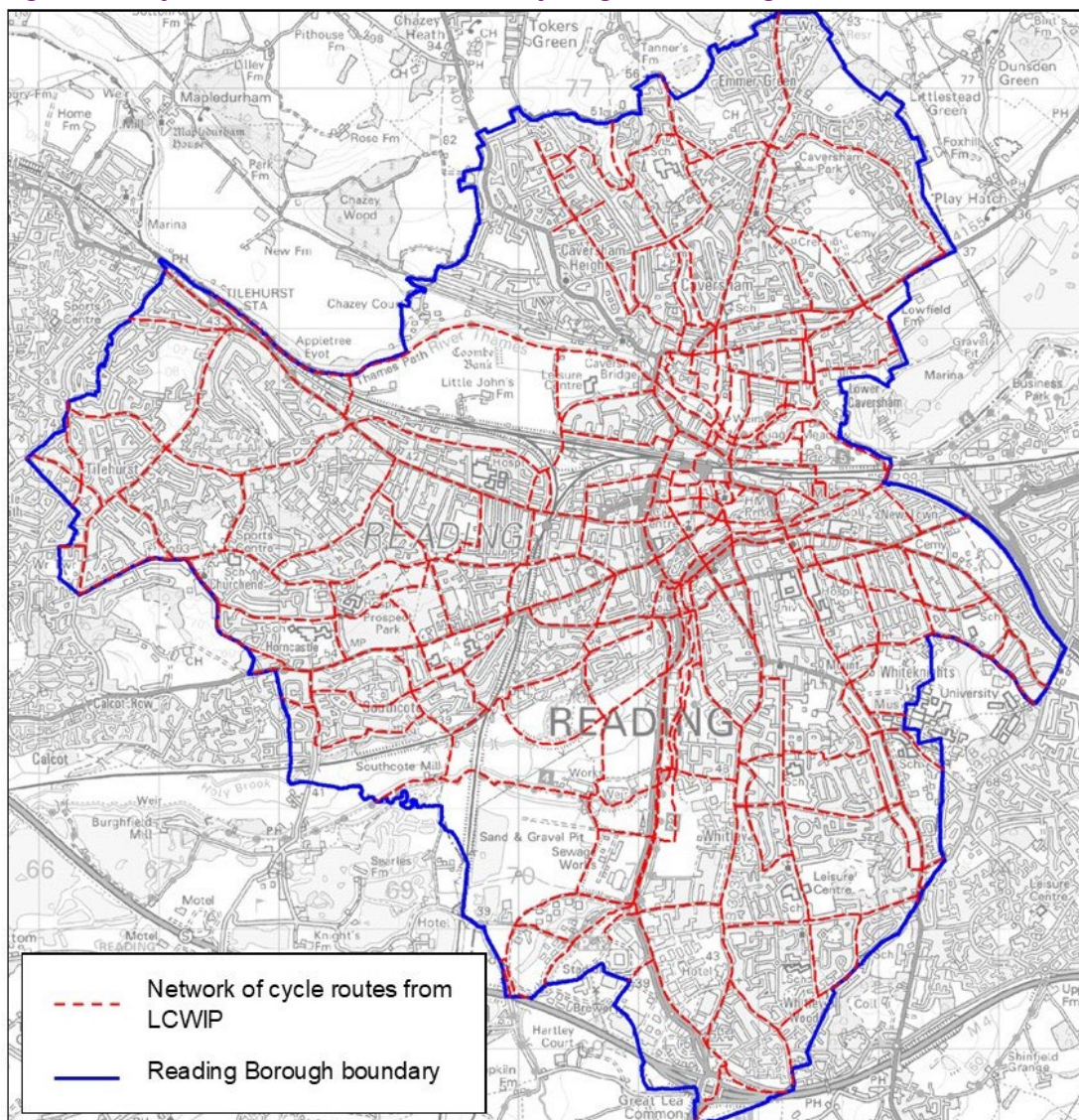
9.17 This policy ensures that opportunities are taken to improve cycling access, and identifies cycle routes that should be maintained, enhanced or extended. The routes are shown on the proposals map and are based on the 2014 Cycling Strategy.

9.18 A Local Cycling and Walking Infrastructure Plan (LCWIP)²³ was published in March 2020 and was developed in partnership with Wokingham Borough Council and West Berkshire District Council. The LCWIP forms a sub-strategy to the transport strategy aiming to help deliver plans to increase walking and cycling usage. The LCWIP

²³ [Local Cycling and Walking Infrastructure Plan \(reading.gov.uk\)](https://www.reading.gov.uk)

identifies a network of cycle routes, with five particular categories: town centre routes, strategic routes, orbital routes, local routes and leisure routes. Each of these categories has different measures associated with it and is geared towards different levels of cyclists. This network extends across the whole Reading urban area including areas outside Reading Borough. Figure 9.1 shows the network of routes within Reading Borough. The policy and accompanying proposals map will be updated to include these routes.

Figure 9.1: Cycle network from the Local Cycling and Walking Infrastructure Plan



9.19 The LCWIP also distinguishes between five different types of route, as follows:

- Town centre routes: High quality, safe, designed for high volumes of cyclists, connecting to strategic and orbital routes, and integrated with public transport on low traffic volume/20mph routes;
- Strategic routes: Direct, safe, quickest, high quality, designed for high volumes of cyclists, segregated from traffic and pedestrians (where possible);
- Orbital routes: Provide access between strategic corridors, high quality routes, segregation (desirable);

- Local routes: Quieter roads, pleasant to cycle along, low traffic volumes and speeds;
- Leisure routes: Quieter roads, pleasant to cycle along, low traffic volumes and speeds.

9.20 The following changes are proposed:

- That the proposals map be updated to show the cycle network from the LCWP; and
- That the policy outline the different requirements for the five types of cycle route (cross-referring to the LCWIP for more detail).

9.21 **Alternative options:** The only alternative option identified is to **not update the policy**, which would mean that the policy is significantly out of date, and would mean that opportunities to enhance the more up-to-date cycling network could be missed.

Q46: Do you agree with the proposed updates to policy TR4 to reflect the LCWIP?

TR5: Car and cycle parking and electric vehicle charging

9.22 This policy ensures that car and cycle parking appropriate to the level of accessibility of the site is provided as part of new developments and that electric vehicle (EV) charging is provided for specified developments.

9.23 The identified need for an update to this policy is on electric vehicle charging. Unsurprisingly, this is an area that is changing rapidly. Although recent announcements have pushed back the date of a ban on sale of new petrol or diesel vehicles to 2035, this still falls well within the period of the updated plan. The Council has recently consulted on its Electric Vehicle Charging Infrastructure Strategy 2023²⁴. This notes the importance of securing charge points in new development, but also identified the following needs for infrastructure provision:

- Residents of Reading – Slow to Fast charging on-street for those who cannot install home chargers.
- Commuters and visitors to Reading – Rapid and ultra rapid charging at charging stations and slow to rapid charging at public and private car parks, workplaces, retail, entertainment venues etc reflecting typical duration of stay.
- Businesses providing local services, e.g. taxi services and delivery services

9.24 In terms of specific requirements for new development, Approved Document S took effect on 15th June 2022, meaning that provision of EV charging is generally covered by the Building Regulations. The Approved Document contains higher standards than existing policy TR5, in particular for new residential developments with communal parking, where a charging point per [dwelling](#) is generally expected rather than the 10% specified in TR5. On the face of it, therefore, there is no need for the policy to make provision for EV charging for residential development, even though the [NPPF](#) (paragraph 107) states that planning policies should take the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles into account.

²⁴ [appendix-a---reading-evci-strategy---june-2023.pdf](#)

- 9.25 However, there are some exclusions in the Approved Document regarding residential. In general these relate to where there is a cost over £3,600 per charge point for connection, or whether there is capacity within the existing electric connection, depending on whether or not the building is new build or a change of use.
- 9.26 The main area where there is scope to set standards over and above the Approved Document is in terms of non-residential development. For new non-residential developments, the Approved Document broadly matches the existing TR5 requirements, i.e. one charging point per ten spaces. However, given the increasing need to ensure infrastructure is available to support the move to electric vehicles, in particular the need for rapid and ultra rapid charging at workplaces and other commercial venues identified in the draft EV Charging Infrastructure Strategy, this provides an area where there is scope for improvement. It is therefore proposed to increase the provision for non-residential developments from 10% to 20% of spaces within dedicated car parks of 10 spaces or more.
- 9.27 There is also a need to support the roll-out of appropriately located EV charging infrastructure outside development sites, on which the policy is currently silent. In particular there will need to be increased provision on the public highway, within car parks and in other locations such as filling stations. This provision will not always be covered by [permitted development rights](#), particularly since they only apply in off street parking locations. There will also be a potential need to support the provision of renewable energy that powers charge points. There will be important caveats around keeping the footway clear, minimising clutter and the particular sensitivities of trees and the historic environment, but, if sufficient infrastructure is to be provided to enable a shift to EVs, the presumption in the policy should generally be in favour.
- 9.28 The following changes are proposed:
- That the specific residential EV charging requirements are removed as they are superseded by Building Regulations;
 - That the requirement for non-residential developments be increased from 10% to 20% of off-road spaces where there are at least 10 spaces; and
 - That a presumption in favour of charging infrastructure, subject to caveats around areas such as accessibility, amenity, trees and heritage, be introduced.
- 9.29 **Alternative options:** Other options, which are around non-residential parking, include:
- **Not to update the policy:** This approach would not make any additional contribution to addressing the Climate Emergency through additional EV charging provision.
 - **To seek a higher proportion of non-residential parking to include charge points:** The difficulty with this option is deliverability in terms of whether it can be supported by available electricity supply (already known to be a constraint) as well as viability.

Q47: Do you agree with the proposed updates to policy TR5 regarding electric vehicle charging?

10. Retail, leisure and culture

- 10.1 The following policies are proposed to be updated:
- RL2: Scale and location of retail, leisure and culture development;
 - RL3: Vitality and viability of smaller centres; and
 - RL4: Betting shops and payday loan companies.
- 10.2 The following policies are considered to be up-to-date and are not proposed to be updated:
- RL1: Network and hierarchy of centres;
 - RL5: Impact of main town centre uses; and
 - RL6: Protection of leisure facilities and public houses.

Q48: Do you agree that we should update the retail, leisure and culture policies listed?

RL2: Scale and location of retail, leisure and culture development

- 10.3 This policy identifies the amount of retail, leisure and culture development that will be planned for and sets out the approach to where this development should be located.
- 10.4 The policy currently identifies a need for up to 34,900 sq m of retail and related facilities up to 2036. However, what has actually happened on the ground is that there has been a net loss of retail, leisure and culture floorspace of around 38,000 sq m over the plan period so far (2013 to 2023). There does remain a significant amount of floorspace with planning permission, but in general the trend is that there be a loss of retail floorspace in particular rather than a gain.
- 10.5 The evidence on which these levels of need were based is now more than five years old. In addition, it predated Covid, which is likely to have significantly affected shopping and leisure patterns. For this reason, retail need at least is unlikely to have increased. However, national policy clearly expects the need for economic development uses to be assessed. This evidence remains to be produced. When it is, the proposal is to update policy RL2 to provide for any revisions to the assessed level of need insofar as is possible.
- 10.6 The following change is proposed:
- That the policy be updated to refer to updated needs for retail, leisure and culture uses, taking account of the most up-to-date information.
- 10.7 **Alternative options:** The only alternative option identified is to **not update the policy**, which would not address development needs as required by national policy.

Q49: Are you aware of anything else that should be factored into an update to policy RL2?

RL3: Vitality and viability of smaller centres

- 10.8 This policy aims to manage the uses within the identified district and local centres, in particular ensuring that retail and financial and professional uses do not fall below a certain level, that takeaways are not permitted to over-concentrate, that there would

be no ground floor loss of town centre uses and that additional town centre uses are provided where possible.

- 10.9 The main reason that an update is needed to this policy is that it requires that a minimum proportion of the key frontage in each centre is in A1 (retail) or A2 (financial and professional) use. However, changes to the [use classes order](#) in 2020 have removed these use classes and placed these uses within a wider E class that also includes offices, light industrial, restaurants and cafes and medical centres among other uses. This means that this part of the policy can no longer be applied as drafted.
- 10.10 The proposal is simply to remove part (a) of this policy. There is little point in seeking to replace it with a policy that retains an equivalent level of E class uses, because this is such a wide-ranging use class that very little within these frontages falls outside it. Of those remaining uses that are present within frontages, there are already other controls in the plan on changes to takeaways and non-centre uses (part (b) of this policy) and betting shops and payday lenders (policy RL4). Those uses which fall outside both class E and which are not already controlled by other policies (principally pubs, beauty/nail/tanning salons, tattooists, launderettes, hotels and community uses such as churches) generally contribute to the diversity of a centre and form such a minor element (7% of the total identified key frontages) that there is little to be gained by specifically controlling them.
- 10.11 There will need to be associated changes to part (d) of the policy to refer to class E rather than A1 and A2, and also to the list of centre uses and non-centre uses in paragraph 4.6.16.
- 10.12 In terms of other changes, [permitted development rights](#) came into force in 2021 that would result in E class uses being potentially subject to conversion to residential without requiring planning permission. However, the Council made a legal direction (known as an [Article 4 direction](#)) that came into force in November 2022 to remove these permitted development rights in the most important parts of the district and local centres. This direction was modified by the Secretary of State on 10th October 2023. The supporting text should be amended to reference the direction.
- 10.13 The following changes are proposed:
- That criterion a) which seeks to retain a certain proportion of A1 and A2 uses within each centre be removed from the policy;
 - That the policy and supporting text wording be revised to reflect new use classes; and
 - That reference be made to the Article 4 direction that controls changes to residential within parts of the centres.
- 10.14 **Alternative options:** Other options include:
- **Not to update the policy:** This approach would mean that the policy remains out of date, and that parts of it are no longer realistically capable of implementation.
 - **To seek to retain a minimum proportion of use class E:** The difficulty with this approach is that class E is now so wide-ranging as to render the policy almost pointless, in that there is very little within the broad category of town centre uses that does not fall within that use class.

Q50: Do you agree that we should update policy RL3 as described to reflect permitted development rights?

RL4: Betting shops and payday loan companies

- 10.15 This policy prevents clustering of betting shops and payday loan shops, so that an application for such a use should not result in three or more premises within 150 m of the application property. The issue is that clustering of such premises can exacerbate existing economic problems in local areas, as well as having a detrimental effect on the appearance and character of the area, particularly where the shopfronts are obscured.
- 10.16 This policy was not identified as being in need of update within the Local Plan Review, but there has recently been an increase in proposed [adult gaming centres](#), in particular in the Friar Street area where there a number of betting shops are already present. These gaming centres have much the same effect as betting shops and payday lenders in terms of economic issues and character and appearance. It is therefore proposed that policy RL4 should be extended to cover these premises.
- 10.17 There is also a risk that the existing policy wording could be interpreted as meaning that the policy will only apply where an application takes the cluster over the threshold of three and that once this is already exceeded there are no further restrictions. This is not the policy intent, and this should therefore be clarified.
- 10.18 The following changes are proposed:
- That the policy be extended to cover all gambling establishments; and
 - That it be clarified that, where there are already three establishments within 150 sq m, no further increase will be permitted.
- 10.19 **Alternative options:** Other options include:
- **Not to update the policy:** This approach would allow adult gaming centres and other gambling establishments to continue to cluster, leaving to effects on local economic conditions and character of the local area.
 - **To set an alternative threshold for adult gaming centres:** This approach would mean applying a different threshold for adult gaming centres than for betting shops and payday lenders. However, this would not address a situation where it is the combination of one of each of the uses outlined in the policy that is causing the issues.

Q51: Do you agree that we should update policy RL4 as proposed to address other gambling establishments?

11. Other uses

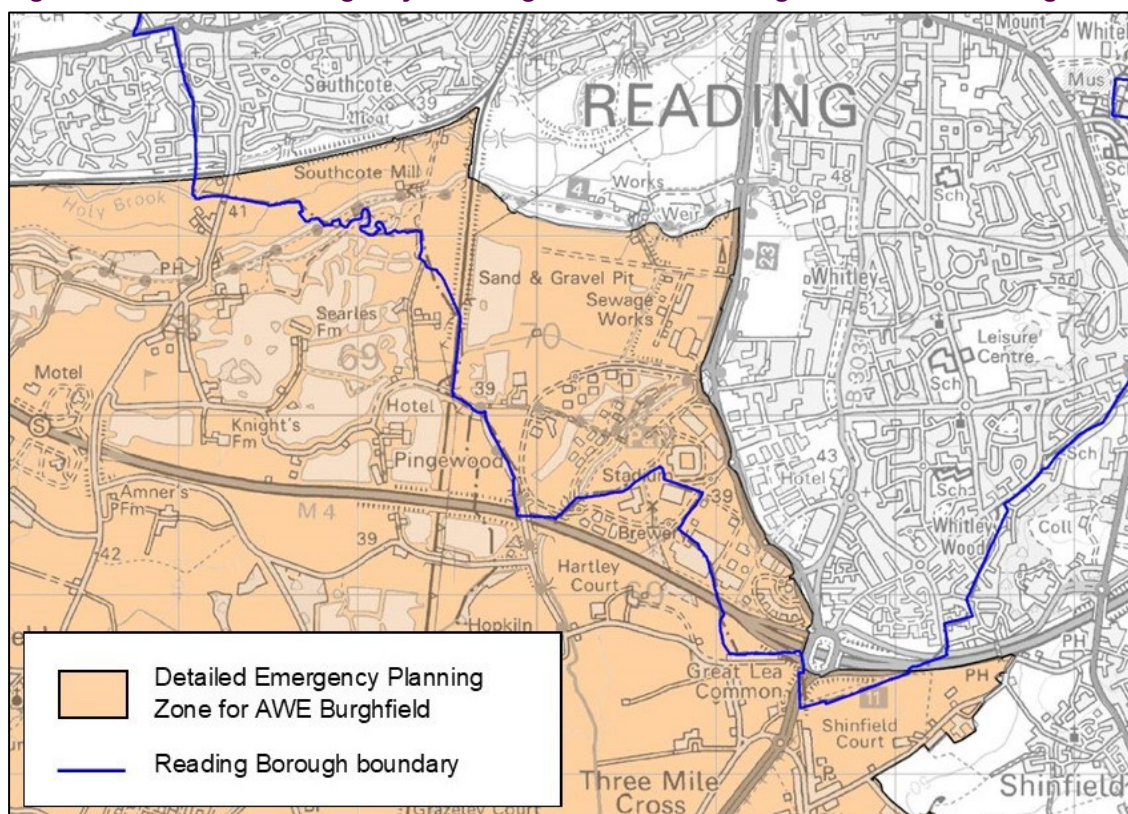
- 11.1 The following policies are proposed to be updated:
- OU2: Hazardous installations; and
 - OU3: Telecommunications development.
- 11.2 The following policies are considered to be up-to-date and are not proposed to be updated:
- OU1: New and existing community facilities;
 - OU4: Advertisements; and
 - OU5: Shopfronts and cash machines.

Q52: Do you agree that we should update the policies for other uses listed?

OU2: Hazardous installations

- 11.3 This policy ensures that proposals that would involve hazardous substances, or development in the vicinity of hazardous sites, would not pose adverse health and safety risks.
- 11.4 Most aspects of the policy, including its general principles, remain up-to-date and are not proposed to be changed. However, there has been a significant change the area around the Atomic Weapons Establishment (AWE) Burghfield that needs to be reflected. In 2020, the [Detailed Emergency Planning Zone \(DEPZ\)](#) around AWE Burghfield was significantly extended and, for the first time, now includes extensive parts of Reading. This was not as a result of any change in activities on the site but resulted from changes in the relevant legislation. The area affected is generally to the west of the A33 and south of the Kennet & Avon Canal. This represents a significantly greater constraint on development in this area than existed at the time that OU2 was drafted. A map of the DEPZ as it applies to Reading is in Figure 11.1.
- 11.5 The following changes are proposed:
- There should be an additional clause to the policy which deals specifically with development in the DEPZ for AWE Burghfield, which makes it clear that proposals will be judged in terms of their impact on the AWE Burghfield Off-Site Emergency Plan and that increases in population within the DEPZ will not be acceptable unless they can be accommodated within that Plan;
 - The DEPZ boundary should be added to the Proposals Map; and
 - The supporting text on AWE Burghfield (currently paragraphs 4.7.15 and 4.7.16) needs to be rewritten to include the updated position and a map similar to Figure 11.1.

Figure 11.1: Detailed Emergency Planning Zone for AWE Burghfield within Reading



- 11.6 **Alternative options:** The only alternative option identified is to not update the policy, but this will fail to reflect changes that are already in effect and fail to provide a clear local policy basis for judging proposals in the DEPZ.

Q53: Do you agree with the changes proposed to reflect the extension of the DEPZ for AWE Burghfield? Are there other changes that are required?

- 11.7 The degree to which the DEPZ prevents development from taking place within its boundaries is a matter which will need to be considered when considering relevant allocations. Existing allocation SR1 is within the DEPZ for example, as is the suggested site Sou4 at Flagstaff Road. Recent inconsistent [appeal](#) decisions have not been helpful in clarifying this matter. It is also worth noting that much of the DEPZ within Reading falls outside the 3 km buffer of AWE Burghfield which was the starting point for defining the zone and was only included when this was mapped to features on the ground to avoid splitting communities. It will therefore need to be weighed against other factors.

OU3: Telecommunications development

- 11.8 This policy aims to deliver telecommunications infrastructure and increase digital connectivity throughout the Borough while mitigating the negative effects of installations on amenity.
- 11.9 The existing policy approach is robust and has been tested at appeal on several occasions. Appeal decisions since the [adoption](#) of the plan have reinforced the need for adequate assessment of alternative sites.

- 11.10 Although the existing policy is generally effective, it would benefit from removal of reference to outdated technology. Additionally, the policy should be strengthened to express the Council’s requirement for careful siting and design of installations to ensure there are no adverse impacts on visual amenity, heritage, trees and highway safety.
- 11.11 Since the adoption of the Local Plan in 2019, there have been a number of changes to [permitted development rights](#) with regard to telecommunications infrastructure. The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022 came into force on 4th April 2022. As such, many applications for telecommunications development now fall under the prior approval process.
- 11.12 In addition, the [NPPF](#) now states that, when considering the need to keep masts to a minimum, this should take into account “*providing reasonable capacity for future expansion*”. It makes specific reference to 5G technology as well as technology needed to enable smart cities.
- 11.13 The existing policy and supporting text refers to lamp column ‘swap outs’. This is no longer considered relevant or desirable as the size of installations has increased substantially. Instead of pursuing opportunities for lamp column ‘swap outs’, large installations should be designed in such a way to avoid adverse impacts through careful siting, preferably avoiding pavements or alongside streets, where possible.
- 11.14 The following changes are proposed:
- Amend the first bullet point of the policy to state that development should be carefully sited and designed as to avoid adverse impacts to trees and highway safety, in addition to heritage assets and neighbouring amenity. Applications that result in a negative impact due to the cumulative effect of multiple installations within a single location will not be permitted.
 - Amend the second bullet point to omit reference to lamp column ‘swap-outs.’
 - Amend the third bullet point to ensure that alternative sites ‘especially those that avoid use of pavements or sites alongside streets’ have been fully investigated.
 - The supporting text should be amended to:
 - Explain that given the increasing size of installations, streetside siting is increasingly problematic.
 - Explain new permitted development rights for telecommunications which came into force on 4th April 2022. These:
 - Enable more significant provision of radio housing;
 - Allow for the widening and increasing the height of existing ground-based masts;
 - Allow additional height for building-based masts;
 - Increase the height limit for new ground-based masts; and

- Strengthen the conditions on the siting and visual impacts of development.
 - Remove reference to third- and fourth-generation technology in paragraph 4.7.18.
 - Remove paragraphs 4.7.20, 4.7.21 and 4.7.23.
 - Remove reference to EU Council's recommendation for ICNIRP certificates and simply refer to the certificate itself.
- 11.15 **Alternative options:** The only alternative identified is to **not update the policy**. Although the criteria for assessing proposals largely remains the same, this would result in a policy that is out-of-date as it fails to refer to the changing technology, the new role of permitted development rights and the increasing importance of ensuring that alternative sites have been fully investigated, as reinforced by recent appeal decisions.

Q54: Do you agree with the changes proposed to policy OU3?

12. Area-specific policies and site allocations

12.1 The following policies are proposed to be updated:

- CR2: Design in Central Reading;
- CR5: Drinking establishments in Central Reading;
- CR6: Living in Central Reading;
- CR7: Primary frontages in Central Reading;
- CR11: Station/River Major Opportunity Area;
- CR12: West Side Major Opportunity Area;
- CR13: East Side Major Opportunity Area;
- CR14: Other sites for development in Central Reading;
- CR15: The Reading Abbey Quarter;
- SR1: Island Road Major Opportunity Area;
- SR4: Other sites for development in South Reading;
- SR5: Leisure and recreation use of the Kennetside areas;
- WR3: Other sites for development in West Reading and Tilehurst;
- CA1: Sites for development and change of use in Caversham and Emmer Green;
- ER1: Sites for development in East Reading;
- ER2: Whiteknights Campus, University of Reading; and
- ER3: Royal Berkshire Hospital.

12.2 The following policies are considered to be up-to-date and are not proposed to be updated:

- CR1: Definition of Central Reading;
- CR3: Public realm in Central Reading;
- CR4: Leisure, culture and tourism in Central Reading;
- CR8: Small shop units in Central Reading;
- CR9: Terraced housing in Central Reading;
- CR10: Tall buildings;
- CR16: Areas to the north of Friar Street and east of Station Road;
- SR2: Land north of Manor Farm Road Major Opportunity Area;
- SR3: South of Elgar Road Major Opportunity Area;
- WR1: Dee Park;
- WR2: Park Lane Primary School, The Laurels and Downing Road; and
- CA2: Caversham Park.

Q55: Do you agree that we should update the area-specific and site allocation policies listed?

CR2: Design in Central Reading

- 12.3 This policy aims to ensure that development within Central Reading is designed in such a way that it contributes to and respects the particular character of the central area, such as its historic character, fine-grained grid structure, elements of high-quality townscape, waterspaces, open spaces and public realm. Policy CR2 aims to pick up on elements that require more specific detail than is provided in CC7 and other design policies.
- 12.4 The following changes are proposed:
- Remove the reference in paragraph a to the ‘existing grid’ as this may have become fragmented and instead refer to aims to re-establish an ‘original grid.’
 - In paragraph c, add reference to designing for biodiversity net gain.
 - A paragraph should be added to clarify how instances of conflict between priorities should be dealt with.
 - The supporting text should be amended to:
 - Refer to the principles of the National Model Design Code and a forthcoming Design Code for Reading as stated above with regard to CC7.
 - Give an example of how instances of conflict between priorities should be dealt with. For instance, in the case of a proposed direct north-south link from the station preventing the provision of active frontages, the route should be prioritised and active frontages provided where possible, as the transport link is considered of higher priority than the possible positive effects of an active frontage.
- 12.5 **Alternative options:** The only alternative identified is to **not update the policy**. Although this would continue to contribute to positive design within the town centre, it does not refer to the most up-to-date government guidance or facilitate the adoption of a local design code in the coming years. Retention of language referring to “the existing grid” may result in applications for development which are fragmented. The existing policy approach also fails to specify how conflicts between priorities should be addressed.

Q56: Do you agree that we should update policy CR2 as described? Are there other changes that are required?

CR5: Drinking establishments in Central Reading

- 12.6 This policy sets out the approach to proposals involving pubs, bars and clubs in Central Reading.
- 12.7 The reason that this policy has been identified as within scope of the update is that the Cumulative Impact Assessment (CIA) is overdue for review. The CIA is part of the Licensing Policy and deals with the sale of alcohol within the Town Centre Cumulative Impact Area (covering most of the commercial core of the centre). The existing CIA currently covers the period from October 2018 to October 2021. A Draft CIA was published for consultation, which ended on 12th September 2023.

- 12.8 The intention is that policy CR5 should be aligned with any applicable CIA for the town centre, albeit taking the different roles of licensing and planning powers into account. As such, updates to this policy will await further detail on the status of the CIA.
- 12.9 **Alternative options:** The only alternative option identified is to not update the policy, but this will potentially lead to a situation where planning policy and licensing policy are not aligned and would lead to confusion.

Q57: Do you have any comments on whether and how policy CR5 should be updated?

CR6: Living in Central Reading

- 12.10 This policy deals with specific matters that affect residential proposals in the centre of Reading, including the mix of unit sizes, noise and air quality issues, specific requirements for affordable housing tenure and the issue of [serviced apartments](#).
- 12.11 The [NPPF](#) (paragraph 125) states that there should be minimum density standards for city and town centres, and that these should seek a significant uplift in the average density of residential areas, unless there are strong reasons why this would be inappropriate. This was the particular reason that this policy was identified for an update. However, the issue of minimum densities is now considered in relation to policy H2 and does not need to be restated here.
- 12.12 The issue where an update is most likely to be necessary is the mix of housing. As previously stated for policy H2, securing family housing of three or more bedrooms is extremely challenging. The expectation in CR6 is that developments of 15 or more [dwellings](#) will include at least 5% of dwellings at three or more bedrooms. This reflects the challenges of delivering family housing on high-density town centre sites. However, with the town centre likely to make up the majority of housing delivery over the plan period, there is a strong case to be made for expecting a greater mix on town centre sites.
- 12.13 The following change is proposed:
- To increase the minimum proportion of family homes of three or more bedrooms expected on town centre sites from 5% to 10 or 15%.
- 12.14 **Alternative options:** Other options include:
- **Not to update the policy:** This would make no contribution towards improving the mix of housing delivered to secure more family homes.
 - **To increase the minimum proportion of three-bedroom homes further to 20%:** There are likely to be much more significant issues in delivering this in practice, in that it is much less likely than the proposed approach to be in line with demand, as well as making it more difficult to achieve the required number of dwellings on town centre sites.

Q58: Do you agree that we should update policy CR6 to seek a greater contribution towards family housing?

CR7: Primary frontages in Central Reading

- 12.15 This policy aims to ensure that the main shopping frontages across Central Reading provide active uses with a shopfront, and that a proportion of retail or financial and professional use is retained within each frontage.
- 12.16 The main reason that an update is needed to this policy, as for policy RL3, is that it requires that a minimum proportion of the key frontage in each centre is in A1 (retail) or A2 (financial and professional) use, but changes to the [use classes order](#) in 2020 have removed these use classes and placed these uses within a wider E class. This means that this aspect of the policy can no longer be applied as drafted.
- 12.17 The proposal is to remove the final paragraph of the policy, which refers to a minimum proportion of any specific use. This is because use class E, within which changes cannot be controlled, covers such a wide range of uses that a minimum proportion would be ineffective. Other parts of this policy already prevent a loss to the types of uses that do not activate the primary frontage, such as residential.
- 12.18 The first paragraph of the policy will also need to be amended where it refers to specific use classes that will be appropriate on the primary frontages. The updated policy should refer to C1, E, F1, F2 or related [sui generis](#) uses,
- 12.19 Where primary frontages are shown on the Proposals Map they are either existing frontages or proposed frontages. Existing frontages are mapped onto existing buildings and proposed frontages show a broad direction of the frontage within a proposed development site, The Station Hill development is under construction, with some parts already occupied, and there is therefore a need to change the frontage that extends through the site to meet Friar Street from a proposed to an existing primary frontage. Figure 12.1 shows the proposed extent of the frontage.

Figure 12.1: Proposed extent of primary frontage in Station Hill



12.20 Alternative options: Other options include:

- **Not to update the policy:** This approach would mean that the policy remains out of date, and that parts of it are no longer realistically capable of implementation.
- **To seek to retain a minimum proportion of use class E:** The difficulty with this approach is that class E is now so wide-ranging as to render the policy almost pointless, in that there is very little within the broad category of town centre uses that does not fall within that use class.

Q59: Do you agree that we should update policy CR7 as described to reflect changes in use classes?

CR11: Station/River Major Opportunity Area

12.21 This policy identifies the Station/River Major Opportunity Area, a large area of redevelopment potential centred around Reading Station, and extending to the River Thames in the north and Friar Street in the south, for redevelopment and change for a mix of uses including 2,245-3,415 dwellings and 136,000-190,000 sq m of commercial floorspace.

12.22 There has been progress on many of the key sites within the Station/River Major Opportunity Area. The general update on each of the sub-areas is as follows:

- CR11a: Friar Street and Station Road: This sub-area covers a large number of relatively small sites. Some development had already been completed by [adoption](#) of the Local Plan, but more recent progress includes:
 - 1 Station Road: Completion of conversion and extension for 14 dwellings.
 - Applications have been submitted for redevelopment of 35-39 Friar Street and change of use of 13-15 Station Road that would deliver new dwellings, but not yet determined.
- CR11b: Greyfriars Road corner: This site is divided into two parts:
 - 20 Greyfriars Road: Prior approval is in place for change of use of offices to 43 dwellings. Development has not yet started.
 - 52-55 Friar Street: No application or development progress other than an expired permission for redevelopment.
- CR11c: Station Hill: The whole of the site now has planning permission for a very significant mixed use redevelopment. This consists of the following elements:
 - Phase 1: Development for 599 dwellings and ground floor commercial uses in the area south of Garrard Street is under construction, and the first dwellings have recently been completed.
 - Phase 2: Development for 36,000 sq m of offices is under construction.
 - Phase 3: Outline permission is in place for mixed use development with offices, commercial, up to 750 dwellings and other uses, with no application yet for reserved matters.
- CR11d: Brunel Arcade and Apex Plaza: No application or development progress.
- CR11e: North of the Station: This site is divided into three parts:
 - 80 Caversham Road: Planning permission has been granted for a mixed use development for 620 dwellings, offices, retail, community uses and health centre;
 - Station Retail Park: An application for a significant mixed use redevelopment was received and an [appeal](#) against non-determination is ongoing at the time of writing.
 - Network Rail Car Park: No application or development progress.
- CR11f: West of Caversham Road: The site is divided into two parts:
 - 97a-117 Caversham Road: Planning permission has been granted for redevelopment for 60 dwellings. Development has not yet started.
 - 75-77 Caversham Road: No application or development progress.
- CR11g: Riverside: The site is divided into two parts:

- 55 Vastern Road: Planning permission has been granted for 209 dwellings, a café and a north-south link through the site. Development has not yet started.
- SSE site: No application or development progress.
- CR11h: Napier Road Junction: This site has now been fully developed for 315 dwellings, known as Thames Quarter. No further development is anticipated.
- CR11i: Napier Court: No application or development progress.

12.23 For this, and for the other town centre major opportunity areas, it is not proposed to exclude sites where they are completed or are under construction because the purpose of the designation is to ensure that the area is developed as comprehensively as possible, but the diagrams (in this case Figure 5.3) will be amended to show the status of any buildings that have been completed or are under construction, and specific sub-area guidance for sites that have been wholly completed will be removed.

12.24 In addition, updated work on the [Housing and Economic Land Availability Assessment \(HELAA\)](#) may identify some changes to the capacity levels for further development set out in the policy, in order to help us meet development needs.

Q60: Do you have any comments on the proposed amendments to reflect progress on sites within the Station/River Major Opportunity Area?

12.25 The [Call for Sites](#) exercise resulted in a proposal from the owner of Apex (formerly Apex Plaza) that the capacity of the site, already identified as part of CR11d for “250-380 dwellings, 3,000-5,000 sq m net gain of offices, 1,000-2,000 sq m net gain of retail and leisure”, be increased to reflect its location directly adjacent to the station and within a designated [tall buildings](#) cluster. We would like to hear any views on this before it is considered further.

12.26 In addition, there was a proposal that the site be separated out from the Brunel Arcade site in the allocation to allow it to come forward independently. In our view, this is not necessary, as sites within the same sub-areas have already come forward independently (for instance those within the North of the Station sub-area), but this could potentially be made more explicit within policy CR11 and other equivalent policies.

Q61: Do you have any views on the amendments to CR11d that have been suggested to us?

CR12: West Side Major Opportunity Area

12.27 This policy identifies the West Side Opportunity Area, a large area of redevelopment potential around the western parts of the centre, extending to the railway line in the north and Castle Street in the south, which provides 1,570-2,430 dwellings and 14,000-21,000 sq m of commercial floorspace.

12.28 There has been progress on many key sites within the West Side Major Opportunity Area. The general update on each of the sub-areas is as follows:

- CR12a: Cattle Market: No application or development progress.

- CR12b: Great Knollys Street and Weldale Street: This sub-area covers a number of different sites, on which there has been some progress as follows:
 - Land at Weldale Street and Chatham Street: Development for 418 dwellings under construction, with 253 dwellings already completed.
 - 45 Caversham Road: Development of 40 dwellings under construction.
 - Unit 16 North Street: Planning permission for redevelopment for 10 dwellings and office space. Development has not yet started.
- CR12c: Chatham Street, Eaton Place and Oxford Road: This sub-area covers a number of different sites, on which there has been some progress as follows:
 - 114 Oxford Road: Development for 16 dwellings has been completed.
 - 115 Chatham Street: Planning permission has been granted for redevelopment for 54 dwellings. The existing buildings have been demolished.
 - Applications have been submitted for redevelopment of Eaton Court, 106-112 Oxford Road and 10 Eaton Place that would deliver new dwellings, but are not yet determined.
- CR12d: Broad Street Mall: Planning permission has been granted for development on the Broad Street Mall that would deliver 422 dwellings. Development has not yet started.
- CR12e: Hosier Street: No application or development progress.

12.29 For this, and for the other town centre major opportunity areas, it is not proposed to exclude sites where they are completed or are under construction because the purpose of the designation is to ensure that the area is developed as comprehensively as possible, but the diagrams (in this case Figure 5.4) will be amended to show the status of any buildings that have been completed or are under construction, and specific sub-area guidance for sites that have been wholly completed will be removed. In addition, there is a need for a revision to site CR12e (Hosier Street) to refer to the latest proposals, through money from the Levelling-Up Fund, for improvements to the Hexagon Theatre.

12.30 In addition, updated work on the Housing and Economic Land Availability Assessment (HELAA) may identify some changes to the capacity levels for further development set out in the policy, in order to help us meet development needs.

Q62: Do you have any comments on the proposed amendments to reflect progress on sites within the West Side Major Opportunity Area?

12.31 The Call for Sites exercise resulted in a proposal that the allocation of the Cattle Market site (CR12a) be amended to reduce the amount of retail on site and increase the number of homes. It was suggested that the site could accommodate 800 to 1,200 dwellings compared to 330 to 490 in the existing allocation. The Council will carry out its own assessment of the possible capacity, but we would like to hear any views on this before it is considered further.

Q63: Do you have any views on the amendment to CR12a at the Cattle Market that has been suggested to us?

CR13: East Side Major Opportunity Area

- 12.32 This policy identifies the East Side Opportunity Area, a large area of redevelopment potential around the eastern parts of the centre, extending from close to Reading Station in the west to the mouth of the River Kennet in the east, which would provide 1,531-2,285 dwellings.
- 12.33 There has been progress on many key sites within the East Side Major Opportunity Area. The general update on each of the sub-areas is as follows:
- CR13a: Reading Prison: No application or development progress.
 - CR13b: Forbury Retail Park: This sub-area covers three different sites, on which there has been some progress as follows:
 - Former Homebase and Toys R Us: Development for 765 dwellings was granted planning permission and is under construction, with 292 dwellings already completed.
 - Forbury Retail Park Phase 1: An application has been submitted for redevelopment that would deliver new dwellings, but is not yet determined.
 - Forbury Retail Park Phase 2: No application or development progress.
 - CR13c: Forbury Business Park and Kenavon Drive: No application or development progress.
 - CR13d: Gas Holder: Planning permission has been granted for development that would deliver 130 dwellings. Development has not yet started,
- 12.34 For this, and for the other town centre major opportunity areas, it is not proposed to exclude sites where they are completed or are under construction because the purpose of the designation is to ensure that the area is developed as comprehensively as possible, but the diagrams (in this case Figure 5.5) will be amended to show the status of any buildings that have been completed or are under construction, and specific sub-area guidance for sites that have been wholly completed will be removed.
- 12.35 In addition, updated work on the Housing and Economic Land Availability Assessment (HELAA) may identify some changes to the capacity levels for further development set out in the policy, in order to help us meet development needs.

Q64: Do you have any comments on the proposed amendments to reflect progress on sites within the East Side Major Opportunity Area?

- 12.36 Reading Prison (CR13a) is currently identified for a wide range of possible uses in the existing plan. The site, until recently owned by the Ministry of Justice, was on the market for some time, and a sale is understood to be in progress. According to the policy, the use of the site should include some cultural or heritage element or related retail and leisure that draws on its significance. However, this emphasis can be further strengthened by making clear that a cultural, heritage or leisure use that provides wider benefits to Reading and to the Abbey Quarter is absolutely essential.

Q65: Do you agree with the proposed changes to CR13a to increase the emphasis on culture and heritage?

- 12.37 The Call for Sites exercise resulted in a proposal that the allocation of the Kenavon Drive and Forbury Business Park site (CR13c) be amended to increase the number of homes on site. It was suggested that the site could accommodate 430 to 450 [build to rent](#) dwellings compared to 190 to 285 dwellings in the existing allocation. The Council will carry out its own assessment of the possible capacity, but we would like to hear any views on this before it is considered further.

Q66: Do you have any views on the amendment to CR13c on Kenavon Drive and Forbury Business Park that has been suggested to us?

CR14: Other sites for development in Central Reading

- 12.38 This policy identifies a number of sites for development in Central Reading outside the three major opportunity areas.
- 12.39 There have been changes on a number of the sites listed in policy CR14 that need to be reflected. It is proposed to remove the following sites from the policy:
- CR14b: Former Reading Family Centre, North Street, which is under construction and is nearing completion;
 - CR14c: 17-23 Queen Victoria Street, where a change of use for [serviced apartments](#) has been undertaken and where the residential allocation has therefore been superseded;
 - CR14f: 1-5 King Street, where a change of use to offices has been completed and where the residential allocation has therefore been superseded; and
 - CR14k: Corner of Crown Street and Silver Street, where residential development has been completed.
- 12.40 In addition, updated work on the Housing and Economic Land Availability Assessment (HELAA) may identify some changes to the capacity levels for further development set out in the policy, in order to help us meet development needs.

Q67: Do you agree with the proposed changes to the existing allocated sites in Central Reading? Do you want to see any other changes?

- 12.41 The following sites in Central Reading have been identified as possible additions to the policy through the call for sites or other sources. More detail on each site is included in Appendix 2, and we would like to hear your views on whether they should be identified before we come to a conclusion on their suitability. Please note that the suggested uses and any indication of scale of development are what has been suggested to us at this point, and do not necessarily represent our view on the most suitable form of development, if any:
- Aquis House, 49-51 Forbury Road and 33 Blagrove Street (Cen1): potential redevelopment of offices for mixed residential and office development of 10-15 storeys;
 - Reading Central Library, Kings Road (Cen 2): primarily residential development as a result of the proposed library move to Bridge Street;

- John Lewis depot, Mill Lane (Cen3): potential redevelopment of warehouse (which forms part of the existing CR14g allocation) for around 200 build-to-rent dwellings;
- Crowne Plaza Reading, Richfield Avenue (Cen4): potential full or partial redevelopment of hotel site for hotel with ancillary food and drink, residential use, residential care and/or filling and EV charging station;
- 2 Norman Place (Cen5): potential redevelopment of office for a residential development of around 240 dwellings;
- Reading Bridge House, George Street (Cen6): potential redevelopment of office building for 300 to 400 dwellings;
- Tesco Extra, Napier Road (Cen7): potential development of part of the existing car park for 150-200 dwellings;
- Kennet Place, Kings Road (Cen8): conversion to approximately 70 apartments.
- Sapphire Plaza, Watlington Street and Royal Court, Kings Road (Cen9): potential redevelopment of office and residential block for a residential development of 250 to 400 dwellings and around 3,000 sq m of commercial space;
- Part of Reading College site, Kings Road (Cen10): potential redevelopment of south eastern corner of site for mixed use or residential development of around 45 dwellings.

12.42 **Alternative options:** Potential alternative options for each individual additional site are set out in Appendix 2.

Q68: Do you have any comments on any of the potential additional allocations to policy CR14?

CR15: The Reading Abbey Quarter

12.43 This policy sets guidance for development within or in the vicinity of the Reading Abbey Quarter, which will be a major area for heritage and cultural life within the Borough, offering educational, economic and open space opportunities.

12.44 The main identified need for update to this policy is around its relationship to the adjoining Reading Prison (site CR13a). As highlighted in relation to CR13, the site is in the process of being sold, and it will be vital that it includes some cultural, heritage or leisure use that provides wider benefits to Reading. Policy CR15 already states that the Abbey Quarter should be considered in the context of the Reading Prison site, but this should be further emphasised by stating that the Reading Prison site should be considered part of the Abbey Quarter for these purposes and that the areas should link into and complement one another.

12.45 The following change is proposed:

- To state that the Reading Prison site should be considered part of the Abbey Quarter for the purposes of CR15 and that the areas should link into and complement one another.

- 12.46 **Alternative options:** The only alternative option identified is to not update the policy, and, whilst there are still hooks in the policy around the relationship to the prison, it may miss an opportunity to further emphasise that it should be considered alongside the Abbey Quarter.

Q69: Do you have any comments on the proposed changes to policy CR15 regarding the Abbey Quarter?

SR1: Island Road Major Opportunity Area

- 12.47 This policy identifies the Island Road Opportunity Area, a large area of development potential around Island Road and to the west of the A33, to provide 129,800-157,000 sq m of employment floorspace.

- 12.48 The general update on each of the sub-areas is as follows:

- SR1a: Former Landfill, Island Road: No application or development progress.
- SR1b: North of Island Road: Development for new industrial and warehouse floorspace has been completed covering the whole site.
- SR1c: Island Road A33 Frontage: No application, other than an old extant office permission that is not expected to be implemented, or development progress.

- 12.49 For this, and for the other town centre major opportunity areas, it is not proposed to exclude sites where they are completed or are under construction because the purpose of the designation is to ensure that the area is developed as comprehensively as possible, but the diagrams (in this case Figure 6.2) will be amended to show the status of any buildings that have been completed or are under construction, and specific sub-area guidance for sites that have been wholly completed will be removed.

- 12.50 With work to identify the level of employment need due to be undertaken, this may have implications for policy SR1, which represents by far the biggest allocation of employment development in the plan. The policy may therefore need to be updated to take this into account.

- 12.51 The Local Plan Review identified the main potential reason for update as being the extension to the [DEPZ](#) around AWE Burghfield (see section 11), which covers the site. However, this is not a new allocation, rather it is a continuation of an existing allocation adopted in 2019 that predates the 2020 changes to the DEPZ and should have therefore been taken into account when the extension was made. However, this is relevant only as long as the allocation remains a continuation of the existing. Any proposal to increase the geographical extent or amount of floorspace on site will need to be considered in the context of the extended DEPZ and the impacts on the Off-Site Emergency Plan.

- 12.52 The following changes are proposed:

- That the diagram and text be updated to show where parts of the allocation have been completed; and
- That the implications of a new assessment of employment need be considered.

Q70: Do you have any comments on the proposed changes to policy SR1 regarding the Island Road area?

SR4: Other sites for development in South Reading

12.53 This policy identifies a number of sites for development in South Reading outside the three major opportunity areas.

12.54 There have been changes affecting one of the sites listed in policy SR4 that need to be reflected. It is proposed to remove the following site from the policy:

- SR4f: Land South West of Junction 11 of the M4, which was identified for development associated with the wider Grazeley garden settlement proposal within Wokingham and West Berkshire's area, but, as described in section 3, this proposal is not being taken forward, and the SR4f allocation is no longer therefore appropriate or deliverable.

12.55 In addition, updated work on the HELAA may identify some changes to the capacity levels for further development set out in the policy, in order to help us meet development needs.

Q71: Do you agree with the proposed changes to the existing allocated sites in South Reading? Do you want to see any other changes?

12.56 The following sites in South Reading have been identified as possible additions to the policy through the call for sites or other sources. More detail on each site is included in Appendix 2, and we would like to hear your views on whether they should be identified before we come to a conclusion on their suitability. Please note that the suggested uses and scale of development are what has been suggested to us at this point, and do not necessarily represent our view on the most suitable form of development, if any:

- Reading Link Retail Park, Rose Kiln Lane (Sou1): potential redevelopment of retail park for mixed residential for around 200 dwellings and retail use of around 2,300 sq m;
- Tunbridge Jones, Cradock Road (Sou2): potential redevelopment of employment site for 72 to 96 dwellings;
- Former Sales and Marketing Suite, Drake Way (Sou3): potential redevelopment of marketing building for 23 dwellings;
- Land at Green Park Village, Flagstaff Road (Sou4): residential development for 50 dwellings including affordable housing; and
- 2 Hexham Road (Sou5): residential development.

12.57 ***Alternative options:*** Potential alternative options for each individual additional site are set out in Appendix 2.

Q72: Do you have any comments on the potential additional allocations to policy SR4?

SR5: Leisure and recreation use of the Kennetside areas

12.58 This policy supports use of the areas around the River Kennet for low-intensity leisure and recreation, and identifies two areas that offer particular opportunities to achieve this aim.

12.59 The Reading Climate Emergency Strategy includes an action (W14) to improve the resilience of the Kennet Meadows through creating a resilient wetland. This is further supported in the Biodiversity Action Plan, which aims to maximise the wildlife value of the Kennet Valley East including by raising water levels in Fobney Meadow. Although the specifics of this proposal are yet to be established, policy SR5 has an opportunity to support these proposals where any planning permission for engineering works would be required.

12.60 The following change is proposed:

- To state that works to create a resilient wetland in the Kennet Meadows will be supported, subject to ensuring that there are no adverse impacts on flood risk and [biodiversity](#).

12.61 **Alternative options:** The only alternative option identified is to not update the policy, but this risks not taking account of a major opportunity for improvements to biodiversity and flood risk, which will help adaptation to the Climate Emergency.

Q73: Do you agree with the proposed update to policy SR5 to reflect potential proposals at Kennet Meadows?

WR3: Other sites for development in West Reading and Tilehurst

12.62 This policy identifies a number of sites in West Reading and Tilehurst for development and change. There have been changes on the sites listed in policy WR3 that need to be reflected. As a result, it is proposed to remove the following sites from the policy:

- WR3a: Former Cox & Wyman site, Cardiff Road, where residential development is completed;
- WR3c: 28-30 Richfield Avenue, which has been refurbished and extended for the existing dealership use and where the residential allocation is no longer expected to be deliverable;
- WR3d: Rivermead Leisure Centre, Richfield Avenue, where new leisure development has been completed;
- WR3q: Norcot Community Centre, Lyndhurst Road, where development in line with the policy is completed.

12.63 It is also proposed to make amendments to existing allocations to reflect changes that have taken place, as follows:

- WR3e: Yeomanry House, Castle Hill, where permission has been granted for nursery use, as yet unimplemented. With changes to the use classes order, it is considered that a wider commercial use of the building that can encompass the permitted nursery use, the restaurant use already noted in the policy as well as other uses, should be incorporated, as an alternative to possible residential use;
- WR3g: 211-221 Oxford Road, 10 and rear of 8 Prospect Street, where residential development at 8 and 10 Prospect Street has been completed, resulting in a reduced area of 0.16 ha;

- WR3i: Part of former Battle Hospital, Portman Road, where the development is mostly completed except for a small part of the site. It is proposed that this small part of the site of 0.21 ha should continue to be allocated for residential use, likely to be in the region of 15-20 homes;
- WR3j: Land at Moulford Mews, where the upper end of the dwelling range is currently 16 dwellings but a planning permission for this site (reference 201391) has demonstrated that 26 dwellings can be accommodated, and this should therefore be the upper end of the range;
- WR3m: 103 Dee Road, where the upper end of the dwelling range is currently 50 dwellings but a planning permission for the site (reference 221130) has demonstrated that 54 dwellings can be accommodated, and this should therefore be the upper end of the range;
- WR3o: The Meadway Centre, Honey End Lane, where there has been a resolution to grant planning permission for a development of new commercial uses and 258 dwellings, which shows that there is significant potential for residential development that should be accommodated within the updated policy.

12.64 In addition, updated work on the HELAA may identify some changes to the capacity levels for further development set out in the policy, in order to help us meet development needs.

Q74: Do you agree with the proposed changes to the existing allocated sites in West Reading and Tilehurst? Do you want to see any other changes?

12.65 During the Call for Sites exercise carried out in 2023, one response suggested that changes were required to sites WR3s (Land at Kentwood Hill) and WR3t (Land at Armour Hill). These changes would entail either changes to WR3t to remove the car park and access track from the allocation, or the wholesale removal of both sites from the plan. Removal of the car park from WR3s would reduce the size of the site by a very small amount, around 0.01 ha, whilst the access track is mostly outside the allocation site anyway. However, it would cause issues in terms of deliverability of the allocation as a whole if the existing vehicular access was not part of the site. Figure 6.1 in section 6 shows the extent of the existing allocations.

12.66 The existing allocation would provide much needed housing, including likely family housing, to help to meet Reading's needs. As discussed in section 8, the Local Plan is not in a position where it can generally afford to lose existing allocated housing sites, particularly in relation to the [standard methodology](#). However, we would like to hear your views before a final decision is reached on whether or not there should be any changes to policy WR3s and WR3t.

Q75: What is your view on the suggested changes to sites WR3s and WR3t?

12.67 The following sites in West Reading and Tilehurst have been identified as possible additions to the policy through the call for sites or other sources. More detail on each site is included in Appendix 2, and we would like to hear your views on whether they should be identified before we come to a conclusion on their suitability. Please note that the suggested uses and scale of development are what has been suggested to us at this point, and do not necessarily represent our view on the most suitable form of development, if any:

- Land west of Millford Road (Wes1): potential redevelopment of employment uses for a residential development of around 70 dwellings;
- 72 Berkeley Avenue (Wes2): residential use;
- Land at 132-134 Bath Road (Wes3): potential redevelopment of employment uses for a residential development or mixed use commercial and residential development;
- Southcote Library, 234 Southcote Lane (Wes4): residential development.

12.68 **Alternative options:** Potential alternative options for each individual additional site are set out in Appendix 2.

Q76: Do you have any comments on the potential additional allocations to policy WR3?

CA1: Sites for development and change of use in Caversham and Emmer Green

12.69 This policy identifies a number of sites in Caversham and Emmer Green for development and change. There have been changes on the sites listed in policy CA1 that need to be reflected. It is proposed to remove the following site from the policy:

- CA1b: Part of Reading Golf Course, Kidmore End Road, where a planning permission (reference 211843) has been granted on a much more extensive site than the existing allocation, covering the whole of the Golf Club site that is within Reading's boundaries, and not including the health use or the retention of the golf use on the remaining land. Construction has now commenced, meaning that the allocation can be removed.
- CA1g: Land West of Henley Road Cemetery, which has now become part of the cemetery.

12.70 It is also proposed to make amendments to existing allocations to reflect changes that have taken place, as follows:

- CA1d: Rear of 200-214 Henley Road, 12-24 All Hallows Road & 4, 7 & 8 Copse Avenue, where the development of two new homes at 4 Copse Avenue has taken place, which means that the allocation reduces from 0.87 to 0.82 ha and the amount of proposed new dwellings should reduce by around two.
- CA1e: Rear of 13-14a Hawthorne Road and 282-292 Henley Road, where the development of four new homes has taken place, which means that the allocation reduces from 0.37 to 0.31 ha and the amount of proposed new dwellings should reduce by around four.

12.71 In addition, updated work on the HELAA may identify some changes to the capacity levels for further development set out in the policy, in order to help us meet development needs.

Q77: Do you agree with the proposed changes to the existing allocated sites in Caversham and Emmer Green?

ER1: Other sites for development in East Reading

12.72 This policy identifies a number of sites in East Reading for development and change. There have been changes on a number of the sites listed in policy ER1 that need to be reflected. As a result, it is proposed to remove the following sites from the policy:

- ER1a: Woodley Arms, Waldeck Street, where student accommodation is under construction;
- ER1f: Hamilton Centre, Bulmershe Road, which has been developed for an education use and where the residential allocation has therefore been superseded;
- ER1h: Arthur Hill Swimming Pool, 221-225 Kings Road, where residential development is under construction; and
- ER1j: Palmer Park Stadium Area, where additional leisure development is completed.

12.73 In addition, updated work on the HELAA may identify some changes to the capacity levels for further development set out in the policy in order to help us meet development needs.

Q78: Do you agree with the proposed changes to the existing allocated sites in East Reading? Do you want to see any other changes?

12.74 The following site in East Reading has been identified as a possible addition to the policy through the call for sites or other sources. More detail on the site is included in Appendix 2, and we would like to hear your views on whether it should be identified before we come to a conclusion on its suitability. Please note that the suggested uses and scale of development are what has been suggested to us at this point, and do not necessarily represent our view on the most suitable form of development, if any:

- Land at 9 Upper Crown Street (Eas1): potential redevelopment of car park for residential development of 46 dwellings.

12.75 **Alternative options:** Potential alternative options for the individual additional site are set out in Appendix 2.

Q79: Do you have any comments on the potential additional allocation to policy ER1?

ER2: Whiteknights Campus, University of Reading

12.76 This policy guides development at the University of Reading's Whiteknights Campus, to take account of the particular constraints of the area including its open space value and biodiversity significance, and to enable the university to continue to develop to fulfil its important role in the town.

12.77 The policy was identified for possible update mainly due to changes to [permitted development rights](#) that increase the ability for a university to expand within its own site. There is potentially significant scope to make use of those rights at the Whiteknights Campus. However, on reflection, there is not considered to be a need for a significant update to the policy other than a reference to those rights, because,

whilst for some developments it may no longer be applicable, there will still be significant instances where a planning application will be required and the policy can be applied.

- 12.78 The other reason identified for possible update was the change to the wording of the NPPF (paragraph 96) that requires local authorities to plan proactively and positively for required public service infrastructure facilities before applications are submitted. In this context, awareness of the University’s own plans and strategies is important. An up-to-date estates strategy has not been published, but there is a Strategic Plan 2020-2026 that identifies four key principles: community, excellence, sustainability and engaged university.
- 12.79 Of the principles, sustainability may have particular implications for the policy, with the University having set a target of reducing its carbon emissions to [net zero](#) by 2030, which fits well with the overall aims for Reading as a whole. It has a Net Zero Carbon Plan 2021-2030 which outlines how this is to be achieved. Whilst there are no specific measures that need to be reflected in any update to policy ER2, it is likely that there will be some measures that will need to go through the planning application process, and this can usefully be referenced within the policy alongside the other forms of development that may be required.
- 12.80 Further information regarding the University’s plans may emerge during the production of the Partial Update, and we will seek to take account of these in any further updates.
- 12.81 The following changes are proposed:
- That development for the purposes of meeting sustainability goals be specifically referenced in the policy; and
 - That anything else emerging from the University’s plans be taken into account in an update.
- 12.82 **Alternative options:** The only alternative option identified is to not update the policy, but this would fail to keep the policy up-to-date to proactively plan for the development required in line with the NPPF.

Q80: Do you agree that we should update policy ER2 regarding Whiteknights Campus as described?

ER3: Royal Berkshire Hospital

- 12.83 This policy guides development at the Royal Berkshire Hospital (RBH) site on London Road, to take account of the particular constraints of the area including its heritage value, and to enable the hospital to continue to develop to fulfil its important role in the town.
- 12.84 The future of the RBH is under active consideration. In December 2020, a Strategic Outline Business Case was produced for consideration by the NHS, which set out three options:
- Development of emergency care block, elective centre for planned hospital care, new women’s and children’s facility and potential local Medical School;

- Building of a substantially new hospital on the present site of the Royal Berkshire Hospital in Reading; and
- Full relocation and rebuilding of a new hospital.

- 12.85 A consultation was undertaken by the Royal Berkshire NHS Foundation Trust between January and March 2023 on the future of the hospital. This consultation included whether or not the existing hospital should be changed, whether a new hospital should be built on the site or whether a new hospital should be developed elsewhere in Berkshire. A decision is not expected to be made until some point during 2024 at the earliest. This decision will clearly have significant implications for the policy.
- 12.86 This Council has made its position clear, in that it strongly believes that the hospital should remain within Reading, where it is most accessible to its catchment, including by public transport, walking and cycling. However, it may not be the Council that will ultimately make the decision on whether development should take place on a new site, in particular if any new site is outside the Borough. Therefore, whilst the updated policy is expected to continue to express the Council's belief that the RBH should remain in Reading, it must nonetheless deal with a scenario in which the site is vacated.
- 12.87 If the RBH is to remain on site, there is a need for it to be substantially remodelled and/or redeveloped. Much of the existing space is cramped, poorly laid out and does not meet modern healthcare needs. There would need to be an increase in floorspace, potentially up to around 30%. It is recognised that this could be difficult to achieve on what is already a densely developed site.
- 12.88 In the scenario of RBH relocating, the Council's strong position is that the site at London Road should continue to meet local healthcare needs. There is an identified need to move towards new models of healthcare provision that incorporate both primary care and other elements such as diagnostics and outpatient care. This necessitates fewer premises, but they need to be larger and more flexible. If the RBH site were to move elsewhere, the site would present a clear opportunity for such provision for East Reading and would offer the continuation of a health use. This could also incorporate other community uses within the site to take advantage of co-location benefits. However, it would not be likely to require the use of the entire site and would also be unlikely to incorporate the listed block at the northern end of the site. There would therefore be expected to be a significant residential component.
- 12.89 The following changes are proposed:
- That the strong preference for the hospital to remain in Reading is clear;
 - To enable expansion on site in a way that does not cause negative impacts to the local area, most notably in terms of transport, heritage and surrounding residential amenity; and
 - That the policy include provisions for the use of the site in the event that the hospital moves elsewhere, including a significant continued health and community role as well as residential use.
- 12.90 **Alternative options:** Other options include:

- **Not to update the policy:** This approach would potentially leave a significant policy gap if the decision was made to move the hospital.
- **To identify the site as a formal development allocation:** It is not possible to meaningfully allocate the site at this point before a decision is made on whether the hospital is to remain or move, because there could be no certainty about delivery.

Q81: Do you agree that we should update policy ER3 regarding Royal Berkshire Hospital as described?

13. Infrastructure delivery

- 13.1 Infrastructure is required to support new development within the Borough through the Plan period to ensure that communities are environmentally, economically and socially sustainable. The requirement for local authorities to assess quality and capacity of infrastructure, as part of the Local Plan process, is identified in the National Planning Policy Framework.
- 13.2 In preparing the Partial Update of the Reading Local Plan, the Council is liaising with a wide range of infrastructure providers to determine long-term strategic infrastructure needs that would result from the level and distribution of planned growth within the Borough. This will result in an Infrastructure Delivery Plan (IDP), a separate document to accompany the Local Plan which sets out in full how infrastructure to support the levels of development set out in this plan will be provided. The existing IDP for the Local Plan is available on the Council's website²⁵. Officers are currently drafting an IDP to accompany the Partial Update.
- 13.3 An Infrastructure Delivery Schedule derived from the emerging Partial Update IDP is included here and summarises the key infrastructure projects which will be required to support the level of proposed growth. These have been identified through a process of consultation with internal departments and external providers. It should be noted that discussions with providers are ongoing and more detail will emerge as the Partial Update process continues. Discussions aim to identify the strategy, existing provision and capacity issues, impact of future growth and priorities for meeting need for the following categories:
- Physical:
 - Transport
 - Water Supply
 - Wastewater
 - Electricity
 - Gas
 - Waste
 - Renewable Energy
 - Digital
 - Air Quality
 - Green:
 - Open Space
 - [Biodiversity](#)
 - Social and Community:
 - Education – Primary and Secondary
 - Education – Post 16 Further Education
 - Early Years – Children's Centres and Nurseries
 - Community Centres

²⁵ The existing IDP to accompany the 2019 Local Plan is available here: [EV007_Full_Infrastructure_Delivery_Plan_March_2018.pdf \(reading.gov.uk\)](#)

- Health – Primary Care and Hospital Provision
- Police
- Fire and Rescue
- Housing – Adult Social Care Accommodation
- Economic Development
- Leisure – Sports
- Culture and Tourism
- Community Safety

The Schedule identifies key infrastructure requirements that are known at this time. It aims to set out the project, the need for it, requirements, costs, funding, timescales and who is responsible for delivery.

- 13.4 The majority of housing development will occur on brownfield sites and represent 100 [dwellings](#) or less. Therefore, in most cases there will not be the requirement for significant infrastructure on a site-by-site basis. The infrastructure schemes will be strategic in nature, serving the impacts of growth from groupings of sites. Where there is need for site-specific infrastructure, this will be addressed and negotiated at the detailed planning stage.
- 13.5 A range of different infrastructure requirements are being reviewed for the Partial Update IDP, but only infrastructure needed to support sustainable growth has been identified within the following schedule. These include core transport projects, health provision and additional police infrastructure. The IDP will be a ‘living’ document and represents a snapshot in time based on the best information available at the time. It will be updated as and when further information becomes available.

Q82: Have all the relevant areas of infrastructure been correctly identified?

Q83: Do you have any comments on the draft IDP schedule?

Table 13.1: Draft Infrastructure Delivery Schedule

Location	Type	Scheme	Need for Scheme	Scheme Requirements	Capital Cost and Funding	Timescales (where known)	Lead Delivery Agency
Borough-wide	Physical	Cycle and e-Scooter Hire	Encouraging active travel and promoting an alternative to car use	Operation and maintenance of publicly available bike and/or e-scooter hire scheme	Cost unknown – LTP block grant, S106, CIL	Ongoing	Reading Borough Council (RBC)
Borough-wide	Physical	Local Walking & Cycling Infrastructure Plan (LCWIP)	Encouraging active travel and promoting an alternative to car use	Local measures to encourage cycling and walking routes, including segregated facilities, lighting, cycle parking, etc.; new areas of development to be connected to existing network	Cost unknown – LTP block grant, Active Travel grant, S106, CIL	Ongoing	RBC
Borough-wide	Physical	Major Repair and Improvement Projects	Improving and maintaining existing infrastructure	Continuous maintenance and improvement of existing facilities and infrastructure including retaining walls, culverts, subways, footbridges and flood defence schemes	Cost unknown – LTP block grant	Ongoing	RBC

Location	Type	Scheme	Need for Scheme	Scheme Requirements	Capital Cost and Funding	Timescales (where known)	Lead Delivery Agency
Borough-wide	Physical	Mass Rapid Transit (MRT) Schemes	Providing alternatives to car use and encourage sustainable transport use; reduce congestion; improve accessibility and air quality	Dedicated express, limited stop bus-based rapid transit connected to Park and Ride locations; focused in key areas of growth and key routes in urban areas	Approx. £100,000,000 – LTP block grant, CIL	2024-2040	RBC
Borough-wide	Physical	Network Management, Junction improvements and Road Safety	Increase attractiveness of public transport, reduce congestion, promote sustainable travel and improve road safety	Improvements to existing infrastructure and enhanced provision	Cost unknown– LTP block grant, S106	Ongoing	RBC
Borough-wide	Physical	Park & Ride Sites (Mobility Hubs)	Reduce the mode share of trips by car to central Reading, thereby reducing congestion and improving accessibility and air quality	A series of new Park and Ride sites and local transport interchanges will be provided on key routes to Reading	Approx. £30,000,000 – S106, LTP, CIL	2024-2040	RBC, adjoining authorities
Borough-wide	Physical	Bus Service Improvement Plan (BSIP)	Increase attractiveness of public transport, reduce congestion, promote sustainable travel, improve accessibility and air quality	Improvements to existing public transport infrastructure and provision enhancement including bus stops, bus lanes and bus priority at junctions	Costs unknown – LTP block grant, BSIP grant, S106, CIL	Ongoing	RBC, adjoining authorities

Location	Type	Scheme	Need for Scheme	Scheme Requirements	Capital Cost and Funding	Timescales (where known)	Lead Delivery Agency
Borough-wide	Physical	Third Thames Crossing	Reduce congestion	Provide alternative north-south route across the River Thames via a new road public transport and active travel bridge, and associated mitigation measures on the road network	Approx. £165,000,000 depending on the option – CIL (this figure depends on the nature of any mitigation measures on the road network)	Third Thames Crossing	Wokingham Borough Council, RBC, Oxfordshire County Council, South Oxfordshire District Council
Borough-wide	Physical	Decentralised energy and renewables	To reduce the carbon footprint of the Borough and reduce and stabilise energy costs, through the development of low carbon, localised energy infrastructure, to reduce dependency on fossil fuels and assist in meeting national and local targets for net-zero carbon	Details are not known at this time, but district energy networks will likely be focussed in the town centre	Costs unknown - CIL, Section 106	Ongoing	RBC

Location	Type	Scheme	Need for Scheme	Scheme Requirements	Capital Cost and Funding	Timescales (where known)	Lead Delivery Agency
Borough-wide	Physical	Water and wastewater infrastructure	To ensure sufficient capacity to accommodate future growth	There are a number of areas within the Borough including some parts of west and south Reading where Thames Water has identified potential capacity issues with water and wastewater, in particular with the overall scale of development in the catchment draining to Blakes Lock SPS. For these areas, detailed investigations and modelling will be required to determine if local infrastructure upgrade is required.	Costs to be determined by Thames Water with developers	As and when a development comes forward and where issues have been highlighted by Thames Water. Thames Water has indicated that upgrades to assets can take up to three years in lead time.	Thames Water and the relevant developer

Location	Type	Scheme	Need for Scheme	Scheme Requirements	Capital Cost and Funding	Timescales (where known)	Lead Delivery Agency
Borough-wide	Physical	Electricity	To ensure sufficient capacity to accommodate future growth	<p>In order to accommodate development as proposed throughout the Borough and to account for increased electricity demand as a result of net zero requirements, major reinforcement works to the infrastructure would need to be carried out. Additionally, cables and plant equipment may require diverting and relocating as a result of development designs and layouts.</p> <p>Discussions with SSEN are ongoing in order to ensure that grid constraints do not negatively impact growth and do not result in connection delays.</p>	Costs to be determined by SSEN chargeable to developments on an appointment basis.	Ongoing	SSEN

Location	Type	Scheme	Need for Scheme	Scheme Requirements	Capital Cost and Funding	Timescales (where known)	Lead Delivery Agency
Borough-wide	Physical	Digital connectivity	Increasing Berkshire's full fibre coverage to 85% by 2025, eliminating connectivity 'not spots' within the Borough, optimising use of wireless and small cell technologies	In order to expand advanced, high-quality and reliable electronic communications networks to support sustainable economic growth	Costs to be determined by providers	Ongoing	RBC and private sector providers
Borough-wide	Physical	Air Quality Monitoring	To assess the levels of pollutants at strategic locations where further development is likely to worsen air quality	NOx and PMx analysers, enclosures and associated infrastructure	Section 106, CIL, DEFRA Air Quality Grant	Ongoing	RBC
South	Physical	South Reading BRT (Bus Rapid Transit) and other BRT schemes	Providing alternative modes to car use and encourage sustainable transport use; reduce congestion; improve accessibility and air quality	Dedicated express, limited stop bus-based rapid transit connected to Mere oak Park and Ride, areas of growth and key routes in the urban area	Approx. £55,000,000 (for South Reading BRT, other scheme costs unknown at this time) – LFG, S106, CIL	2024-2040	RBC
Central/East	Physical	Demand management scheme	Improve air quality and/or decrease congestion	Unknown	Costs unknown – LTP block grant, S106, CIL	Unknown	RBC
Central/East	Physical	Town Centre access and public realm enhancements	Reducing the impact of congestion; delivering a higher quality public realm; encouraging healthier lifestyles; improving access to central Reading	Junction improvements; accident remediation scheme; secure cycle parking hub, improved way finding	Costs unknown – LTP block grant, S106, BID	Ongoing	RBC

Location	Type	Scheme	Need for Scheme	Scheme Requirements	Capital Cost and Funding	Timescales (where known)	Lead Delivery Agency
Borough-wide	Green	Open Spaces Strategy	Improve the quality of existing open space and facilities, particularly in larger parks to benefit the wider population	Improvements to strategically important open spaces	Costs unknown - S106, CIL, grant funding	Ongoing	RBC
Borough-wide	Green	Play Requirements	Some of the current stock of play equipment is more than a decade old. At current levels of use, the quality is declining; an increasing population accelerates the rate of decline such that equipment needs to be continually refreshed.	Continuous investment is needed simply to sustain existing provision and to ensure that it is safe. Because many of the Council's 55 play areas are used to capacity, increases in the local population will require additional equipment. Equipment may need to be updated to meet the needs of children with special needs and children of a variety of ages.	Costs unknown - S106, CIL, grant funding	Ongoing	RBC

Location	Type	Scheme	Need for Scheme	Scheme Requirements	Capital Cost and Funding	Timescales (where known)	Lead Delivery Agency
Borough-wide	Green	Biodiversity Action Plan and Local Nature Recovery Strategies	To protect, enhance and increase biodiversity in parks, open spaces, allotments, cemeteries, woodland, watercourses, riparian corridors and wetland areas.	Reading's Biodiversity Action Plan identifies a number of actions including: enhancing and increasing habitats for plants and wildlife; creating links between existing habitats; increasing plant diversity across grassland open spaces; improving existing and planting additional hedgerows; improving diversity of tree species in woodlands; improving and enhancing the Borough's watercourses and riparian corridors.	Costs unknown – CIL, S106	Ongoing	EA, RBC
Borough-wide	Green	Allotment Creation & Enhancement	Ongoing development pressure on existing private allotments. Very long waiting lists for allotments which will be exacerbated by population growth	To improve allotment provision within the Borough, especially in the North and West	Dependent on funds becoming available or a development opportunity making land available	Ongoing	RBC

Location	Type	Scheme	Need for Scheme	Scheme Requirements	Capital Cost and Funding	Timescales (where known)	Lead Delivery Agency
Borough-wide	Social and Community	Updating and improving Reading's indoor sports provision	Further details to be identified.				
Borough-wide	Social and Community	Police Facilities	To make communities safe, increase public confidence, reduce costs by improving efficiency, improve service delivery and improve outcomes for victims of crime, as well as to aid in the prevention and investigation of crime with ANPR cameras	Premises – new police station in South Reading, touchdown space in central Reading and other areas.	Costs TBD	Ongoing	Thames Valley Police (TVP)
Borough-wide	Social and Community	Digital policing equipment	To make communities safe, increase public confidence, reduce costs by improving efficiency, improve service delivery and improve outcomes for victims of crime, as well as to aid in the prevention and investigation of crime with ANPR cameras	Digital policing equipment including smartphones, tablets, body-worn video cameras, vehicle Wi-Fi and other capabilities, including enhanced and new ANPR cameras at strategic locations within the Borough	Each ANPR camera costs approximately £11,000. Digital policing kit costs approx. £6250 per officer.	Ongoing	TVP

Location	Type	Scheme	Need for Scheme	Scheme Requirements	Capital Cost and Funding	Timescales (where known)	Lead Delivery Agency
Borough-wide	Social and Community	Townsafes and Emergency Planning Radio Scheme	To provide a safe and non-threatening environment for people who live, work or visit Reading	Signal boosters to address the negative impacts of tall buildings on the network, new equipment and software to provide a modern and secure system	CIL	Ongoing	RBC
Borough-wide	Social and Community	CCTV system	To provide a safe and non-threatening environment for people who live, work or visit Reading	Up-to-date CCTV software with high encryption, replacement of existing BT fibre system, new cameras, rollout of wireless CCTV technology	CIL	Ongoing	RBC
Borough-wide	Social and Community	Primary and Secondary Education	Unlikely to be a significant need for additional primary and secondary places. However an increase in specialist provision is likely to be required, as well as a reconfiguration of SEND places and facilities.				

Location	Type	Scheme	Need for Scheme	Scheme Requirements	Capital Cost and Funding	Timescales (where known)	Lead Delivery Agency
Borough-wide	Social and Community	Primary Care	Additional capacity at existing surgeries associated with development and reconfiguration or relocation of any existing sites that are not fit-for-purpose, restructuring of surgeries into fewer, larger more fit-for-purpose facilities that provide a wider range of co-located services	Larger, fully-fitted facilities provided by the developer on the ground floor(s) of new build flatted developments in the centre; larger hubs located throughout the Borough	Costs unknown – CIL, S106 The Integrated Care Board considers the following costs per sqm to be appropriate (as at Oct 2023 and to include VAT and professional fees) as follows: <ul style="list-style-type: none"> • New build and extensions (involving land purchase) - £6,310 psm • Extensions (no land purchase) - £5,692 psm • Internal refurbishments/reconfigurations - £3,750 psm 	Ongoing	RBC, BOB ICB
Borough-wide	Social and Community	Specialist and Hospital Care	Additional floorspace to provide a modern service, relocation of some hospital services (such as diagnostics and some outpatient care) to hubs distributed throughout the Borough, any infrastructure needed to enable the relocation of the RBH (if relocation is needed)	An increase in floorspace will be required on-site if the RBH remains in its current location in order to provide a modern service. This will also require increased digital 'smart hospital' technology and infrastructure associated with net-zero carbon operations	Costs unknown – CIL, S106	Ongoing	RBC, BOB ICB, RBH

Location	Type	Scheme	Need for Scheme	Scheme Requirements	Capital Cost and Funding	Timescales (where known)	Lead Delivery Agency
Borough-wide	Social and Community	Adult Social Care Accommodation	Some existing sites are aging and in need of repair; significant rise in the number of older residents projected throughout the Borough	New, purpose built facilities to relocate existing residential care that is not fit-for-purpose	Costs unknown – CIL, S106	Ongoing	RBC
Borough-wide	Culture and Tourism	Relocation of the Central library and improvements to the Hexagon, ongoing enhancement of the Abbey Quarter, investment in registered parks and gardens, and public realm improvements to wayfinding, interpretation, key monuments, statues and memorials within the town centre.			Levelling-Up Funding regarding library and Hexagon		

14. Glossary

Active travel – A means of travel that involves physical activity, such as walking or cycling.

Adoption – The point at which a planning document becomes official policy through a formal decision by the Council.

Adult gaming centres – A form of gaming establishment requiring a license gaming machines general operating licence from the Gambling Commission and a premises licence from the Licensing Authority, where Category B, C and D machines can be made available.

Affordable housing – Housing provided at below market price to meet the identified needs of an area. A fuller definition is included within the National Planning Policy Framework.

Ancient tree – a tree of great age in relation to others of the same species.

Area of Outstanding Natural Beauty (AONB) – A landscape protected at national level due to its character and natural beauty.

Article 4 direction – A legal direction which can be made by the Council to remove normal permitted development rights.

Biodiversity – The diversity of plant and animal species.

Biodiversity Opportunity Area – Identified areas where there are substantial opportunities to make positive changes for biodiversity at a strategic scale.

BREEAM – A widely used means of reviewing and improving the environmental performance of buildings. BREEAM assessment methods generally apply to commercial developments (industrial, retail etc).

Build to rent – Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control (definition from NPPF)

Call for sites – an exercise whereby the Council asks for sites to be nominated as potential allocations in the Local Plan.

Co-living – A form of communal residential accommodation in which individuals live under a single management regime and which offers more communal facilities and amenities and is usually on a larger scale than a House in Multiple Occupation (HMO).

Community Infrastructure Levy (CIL) – A charge that local authorities can place on most types of new development in their area, to be spent on infrastructure to support the development of the area. CIL was introduced in Reading in April 2015.

Crossrail – A transport project to provide east-west rail links across London, which terminated at Reading station. Services are now running as the Elizabeth Line.

Detailed Emergency Planning Zone (DEPZ) – An area around a specific facility for which particular emergency planning arrangements are in place. In Reading's case, the DEPZ relates to the Atomic Weapons Establishment (AWE) Burghfield.

Development briefs – Documents setting out planning principles for a specific site. Also known as planning briefs.

Development plan – a plan setting proposals for development that has followed the defined processes and is the main consideration in deciding planning applications (alongside national development management policies when they are introduced).

Dwelling – A single housing unit – a house, flat, maisonette etc.

Embodied carbon – in the context of this plan, the amount of carbon dioxide or greenhouse gas emissions associated with construction of a building or development.

Equality Impact Assessment – An assessment of the impacts of a decision or policy on those with protected characteristics under the Public Sector Equality Duty,

Examination – Local plans are considered at an examination, during which the Planning Inspector assesses the soundness and legal compliance of the document.

Extra care – housing designated for occupation mainly by over-55s but with higher level support and care to help residents live independently (source of definition: gov.uk)

First Homes – An affordable housing product constituting homes for sale to first-time buyers at a minimum 70% discount. A more detailed definition is within Planning Practice Guidance.

Habitat Regulations Assessment – An assessment to test if a plan or project proposal could significantly harm the designated features of a European site, protected under the Habitat Regulations.

House in multiple occupation (HMO) – A house occupied by unrelated individuals. Please note that the specific definition of an HMO changes depending on the legislation covering a specific area, e.g. planning or licensing. In Planning, there are two types of HMO – a small HMO under use class C4 of three to six unrelated individuals and a large HMO defined as a sui generis use of seven or more unrelated individuals.

Housing and Economic Land Availability Assessment (HELAA) – An assessment that examines the capacity of an area for housing and economic development uses. National Planning Practice Guidance provides more information on such assessments.

Infrastructure Funding Statement (IFS) – A document that relevant local authorities have to publish annually to report on collection of, spend of and future priorities for developer contributions.

Infrastructure Levy – a levy on development to fund provision of infrastructure, introduced by the Levelling-Up and Regeneration Act.

Inner Distribution Road (IDR) – the inner ring road circling Reading's core, made up of Queens Road, part of Caversham Road, Vastern Road, Forbury Road and part of Watlington Street.

Irreplaceable habitat – Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen (source of definition: NPPF).

Key worker – A worker who provides an essential service to the community. The specific definition can depend on the context.

Levelling-Up and Regeneration Act – An act of parliament, receiving Royal Assent in October 2023, which includes a range of proposals relating to planning and local government.

Local Development Scheme (LDS) – The published programme for producing planning documents.

Locally listed building – Identified locally-significant buildings, which do not benefit from the same statutory protection as buildings on the national list.

Memorandum of Understanding (MoU) – A signed document between parties that sets out an agreed position.

Mobility hubs – an element of the Draft Transport Strategy where people can transfer between modes and access a range of other facilities.

National Planning Policy Framework (NPPF) – A document setting out the main national planning policy for England. The most recent version was published in 2021.

Net zero carbon – achieving a balance between the carbon emitted into the atmosphere, and the carbon removed from it (source of definition: Energy Saving Trust).

Passivhaus – a standard for houses that are very environmentally friendly because they can be kept at a comfortable temperature using no or almost no energy, or a house that meets this standard (source of definition: Cambridge Dictionary).

Permitted development rights – Legal rights that exclude a specific type of development from the need to apply for planning permission.

Planning appeal – There is a right for applicants to appeal against a decision on a planning application.

Planning briefs – Documents setting out planning principles for a specific site. Also known as development briefs.

Planning Practice Guidance – national guidance on planning practice that can be found at [Planning practice guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/planning-practice-guidance)

Purpose built student accommodation (PBSA) – Living accommodation provided specifically for those in education.

Reading Affordable Rent – A locally-set level of affordable rent which is designed to be affordable to those needing affordable housing in Reading, and which is calculated in accordance with paragraphs 4.5 to 4.10 of the Affordable Housing SPD²⁶.

Registered provider – Landlords of affordable housing, including local housing authorities and housing associations, which are registered with the Regulator of Social Housing.

Retrofit – In the context of this plan, to alter a building that has already been built to improve its environmental performance.

Section 106 agreement – A legally binding agreement or obligation entered into by the local authority and a land developer over an issue related to a planning application, under Section 106 of the Town and Country Planning Act 1990.

²⁶ [Affordable Housing SPD, adopted March 2021 \(reading.gov.uk\)](https://www.reading.gov.uk/affordable-housing-spd)

Serviced apartments – A use falling between hotels and housing, providing basic facilities for self-sufficient living but also the amenities of a hotel, and let on short-term tenancies, often less than three months. Generally classed as C1 hotels for planning purposes.

Shared ownership – An affordable housing product where a proportion of the property is purchased and the remainder rented from the Registered Provider.

Small cell technologies – A type of wireless communication infrastructure that is designed to enhance network capacity and coverage in areas with high user density or limited space (source of definition: Mpirical)

Soundness – When holding an examination into planning documents, the role of the Inspector is to decide whether the documents are ‘sound’. Under paragraph 35 of the National Planning Policy Framework (NPPF) plans are sound if they are positively prepared, justified, effective and consistent with national policy.

Standard Assessment Procedure (SAP) – The methodology used by the Government to assess and compare the energy and environmental performance of dwellings.

Standard methodology – The methodology for assessing housing needs set out in Planning Practice Guidance.

Strategic policies – Policies and site allocations which address strategic priorities in line with the requirements of section 19(1B-E) of the Planning and Compulsory Purchase Act 2004.

Submission – The stage at which a draft Local Plan is submitted to the Secretary of State for examination.

Sui generis – A use not specifically defined in the most recent use classes order and which has its own category.

Supplementary Plan – A new form of planning document introduced in 2023 to replace Supplementary Planning Documents (SPDs) that provides further detail to supplement a Local Plan and which has the same weight.

Supplementary Planning Document (SPD) – A planning document that provides more detailed policy guidance than development plans, but does not have the same weight.

Sustainability Appraisal – A sustainability appraisal should be completed for all local development documents at all stages. It highlights the main environmental, economic and social effects of the document.

Sustainability Appraisal Framework – A document setting the basis for carrying out the sustainability appraisal, including setting the objectives and establishing baseline information.

Tall building – For the purposes of Reading’s planning policy, a building of 10 commercial storeys or 12 residential storeys or greater.

Tree Preservation Order (TPO) – An order made by a local planning authority in respect of trees and woodlands. The principal effect of a TPO is to prohibit the cutting down, uprooting, topping, lopping, wilful damage or wilful destruction of trees without the LPA’s consent.

Use Classes Order – A piece of legislation, most recently in 2020, which divides uses into separate use classes, where planning permission is required to change between use classes unless permitted development rights exist.

Veteran tree – a tree that is of interest biologically, culturally or aesthetically because of its age, size or condition (source of definition: Natural England).

West of Berkshire Spatial Planning Framework – A non-statutory document published in December 2016 looking at opportunities for growth in the West of Berkshire, along with the cross-boundary implications and the essential infrastructure needed.

Appendix 1: Proposed changes to EN7 boundaries

Figure A1.1: Proposed change to Mapledurham Playing Fields



Figure A1.2: Proposed change to Palmer Park

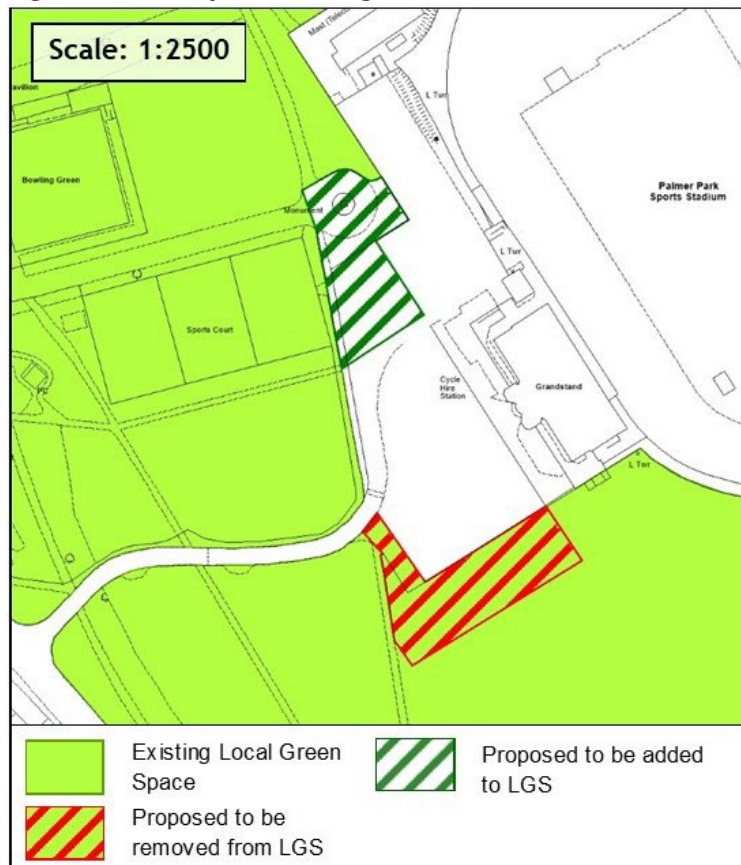
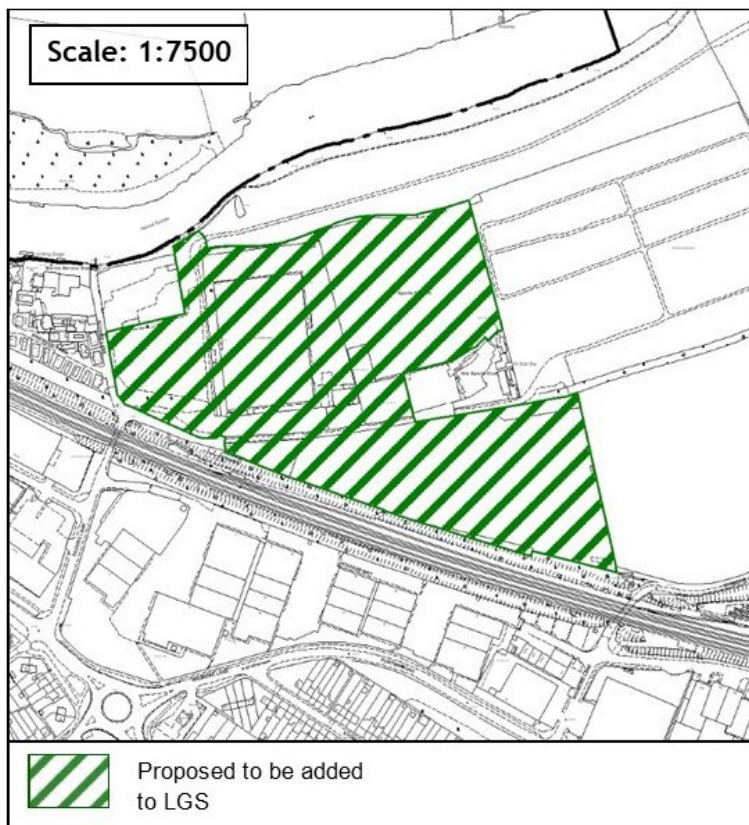


Figure A1.3: Proposed change to Rivermead



Figure A1.4: Proposed change to add Scours Lane and Ibis Sports Ground

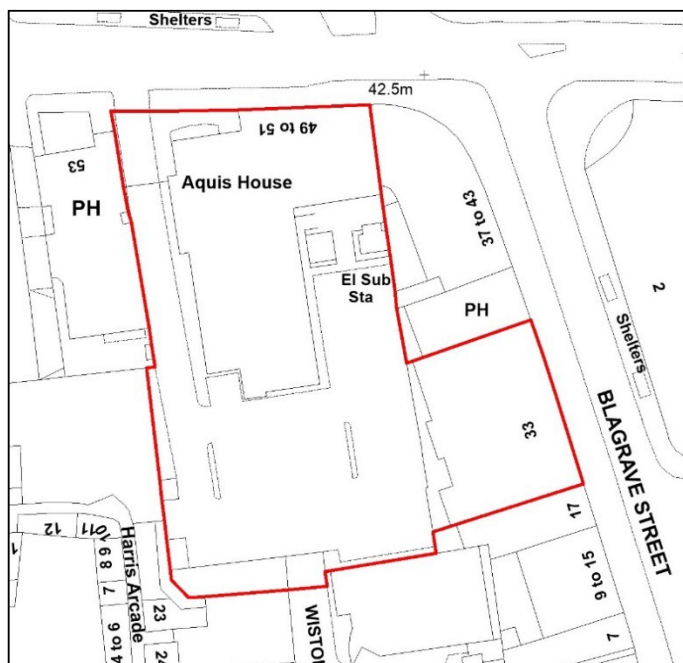


Appendix 2: Additional sites nominated for development

- A2.1 This appendix includes full details of the sites put forward for consideration as a development allocation. Please note that we are consulting on all sites put forward to ensure that a decision on inclusion or exclusion takes account of your views, and that inclusion in this appendix does not mean that a site will necessarily be allocated.
- A2.2 For each site, a range of alternatives have been identified. These are for the purposes of consultation and [sustainability appraisal](#). Unless otherwise stated, they have not been suggested by the developer or landowner, and this means that in some cases the deliverability or viability of the option may make it difficult to pursue that option.

Site Cen1: Aquis House, 49-51 Forbury Road and 33 Blagrove Street

Figure A2.1: Aquis House, 49-51 Forbury Road and 33 Blagrove Street (1:1,250)



Size (hectares): 0.42

Ward: Abbey

Easting: 471580. **Northing:** 173670

Current use: Offices and car parking

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator: Redevelopment of offices for mixed residential and office development of 10-15 storeys

Potential alternative option 1: Do not allocate

Potential alternative option 2: Redevelopment for mixed use residential and office at below tall building threshold level (12 storeys)

Potential alternative option 3: Redevelopment or change of use of 33 Blagrove Street only

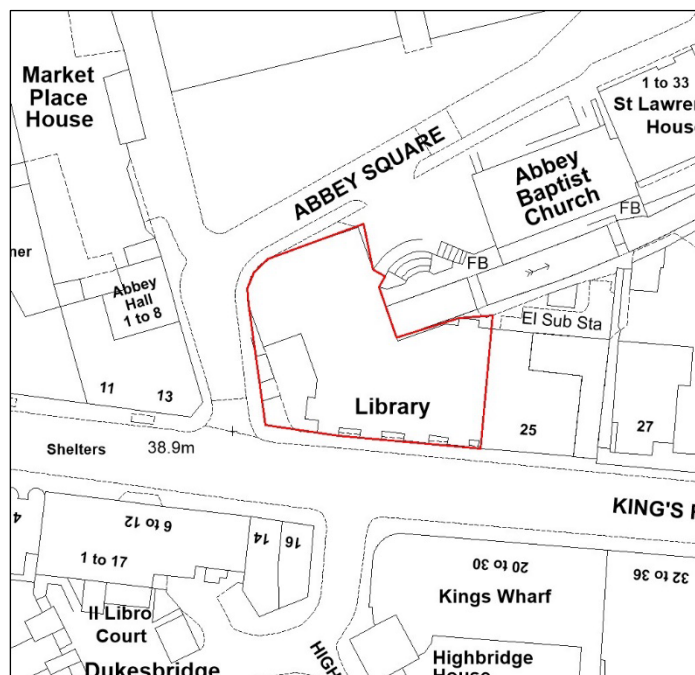
Potential alternative option 4: Redevelopment or change of use of Aquis House only

Issues and constraints: Adjacent to listed buildings and partly within a conservation area. 33 Blagrove St is diagonally opposite the Grade II* listed Town Hall. Within area of archaeological potential. Potential noise issues from adjacent drinking establishments. Noise and air quality issues relating to presence of bus stops and coach station opposite. Surrounding character is of similar height and massing to the existing building (4-6 storeys). Electricity substation located onsite in the carpark behind Aquis House.

Other information: Within the town centre.

Site Cen2: Reading Central Library, Abbey Square

Figure A2.2: Reading Central Library, Abbey Square (1:1,250)



Size (hectares): 0.1

Ward: Abbey

Easting: 471810. **Northing:** 173400

Current use: Library

Source of nominated site: Council-owned site

Development suggested by nominator: Proposal to move the Central Library to Bridge Street, which frees up the library site. Proposal would be for a residential-led development.

Alternative option 1: Do not allocate.

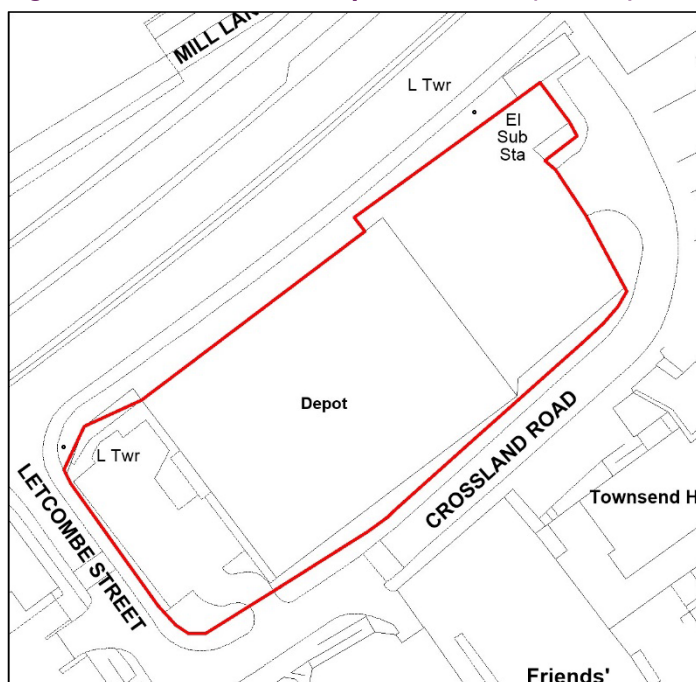
Alternative option 2: Commercial development including office and ground floor retail and related uses.

Issues and constraints: Northern part of site is part of the Reading Abbey scheduled ancient monument. Whole site is within area of archaeological potential. Adjacent to Market Place/London Street Conservation Area. The Holy Brook runs beneath the site and Flood Zone 3 affects the part of the site that straddles the brook. Defined Green Link along Holy Brook to the east. Within Air Quality Management Area. Northern part of site subject to potential contamination as a former warehouse site. Potential noise issues from busy Kings Road, including nearby bus stops. Kings Road is a defined cycle route.

Other information: Within the town centre. Within Reading Abbey Quarter policy boundary (CR15)

Site Cen3: John Lewis Depot, Mill Lane

Figure A2.3: John Lewis Depot, Mill Lane (1:1,250)



Size (hectares): 0.37

Ward: Katesgrove

Easting: 471690. **Northing:** 171080

Current use: Warehouse

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator: Redevelopment of warehouse for around 200 build to rent dwellings.

Alternative option 1: Do not allocate

Alternative option 2: Retain as part of existing allocation CR14g (see below),

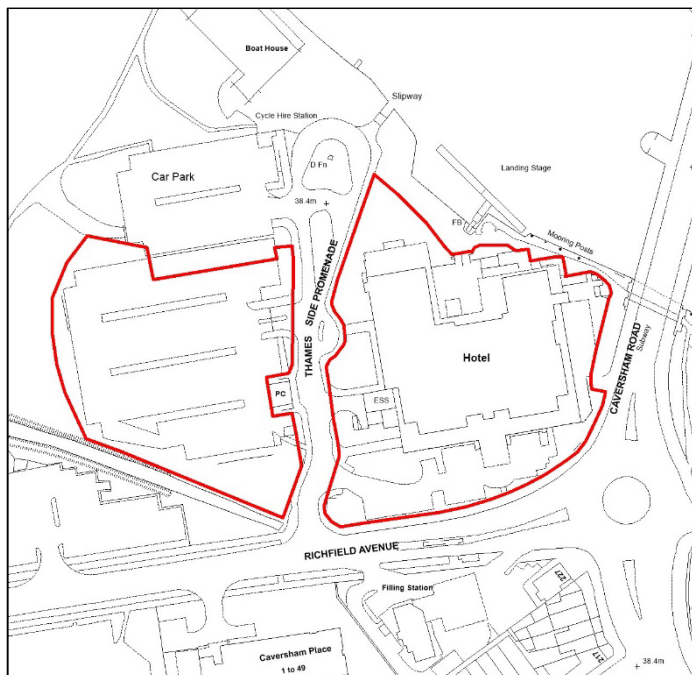
Alternative option 3: Residential development at more general town centre or edge of centre densities (75-125 dwellings)

Issues and constraints: Adjacent to conservation area, as well as listed buildings on London Street. Within area of archaeological potential. Presence of the Inner Distribution Road flyover and associated noise and air quality issues. Existing trees and hedgerows, particularly along Mill Lane. Any development at height is likely to result in overlooking of the cemetery/garden at the Reading Friend's Meeting House and possibly the shared garden at Townsend House. Electricity substation is located on-site.

Other information: Within the town centre. This site is part of the existing allocation CR14g, for an extension to the Oracle involving retail floorspace to the north of this site and relocation of the car park onto this site. This was a longstanding allocation that predated the 2019 Local Plan, but there are no indications that it will be implemented, and the context for new retail has changed substantially in recent years.

Site Cen4: Crowne Plaza Reading, Richfield Avenue

Figure A2.4: Crowne Plaza, Richfield Avenue (1:2,500)



Size (hectares): 1.29

Ward: Thames

Easting: 471050. **Northing:** 174540

Current use: Hotel and car park

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator: Mix of uses through the full or partial redevelopment for hotel (Class C1) with ancillary food and beverage offering (Class E), major residential (Class C3), care home (Class C2) and/or electric vehicle charging station/garage (Sui Generis).

Alternative option 1: Do not allocate

Alternative option 2: Hotel redevelopment only (whole site)

Alternative option 3: Hotel redevelopment only (car park)

Alternative option 4: Residential development and/or residential care only (whole site, estimated at 90-140 dwellings)

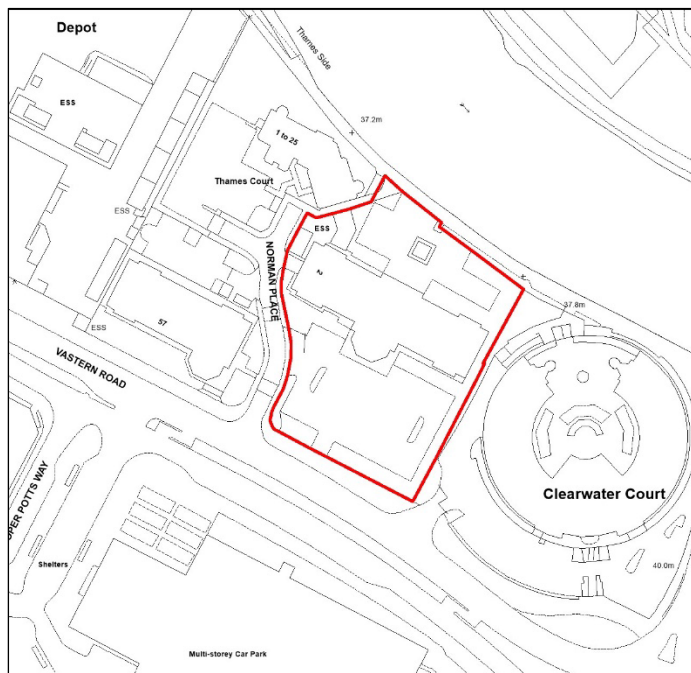
Alternative option 5: Residential development and/or residential care only (car park, estimated at 40-60 dwellings)

Issues and constraints: The part of site west of Thameside Promenade is within Flood Zone 3, with the remainder within Flood Zone 2, requiring compliance with the sequential test and potentially exception test. Site is adjacent to Thames Valley Major Landscape Feature. Close to existing employment areas south of Richfield Avenue. There are a number of [Tree Preservation Orders](#) on site including within the car park. Within Air Quality Management Area.

Other information: Within the town centre.

Site Cen5: 2 Norman Place

Figure A2.5: 2 Norman Place (1:2,500)



Size (hectares): 0.55

Ward: Thames

Easting: 471660. **Northing:** 174050

Current use: Offices

Source of nominated site: Developer submission to call for sites

Development suggested by nominator: Residential development of up to 240 homes.

Alternative option 1: Do not allocate

Alternative option 2: Residential development at more general town centre or edge of centre densities (110-185 dwellings)

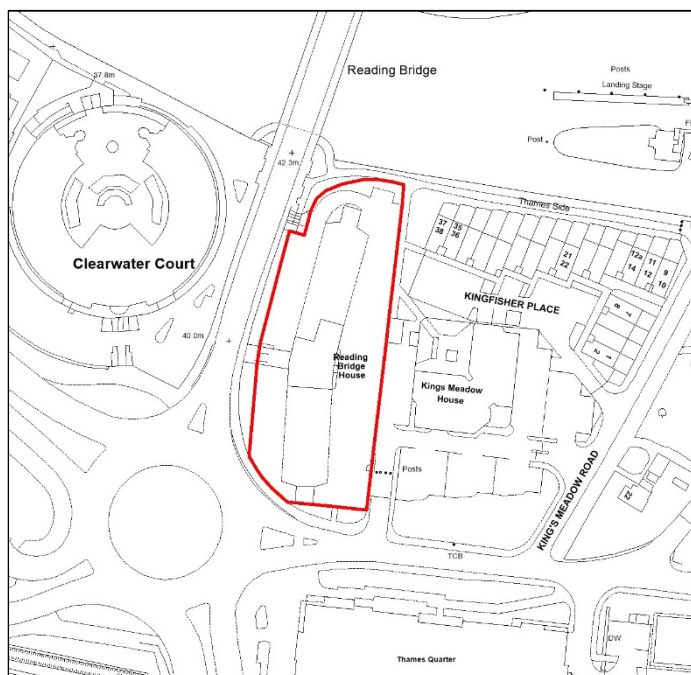
Alternative option 3: Conversion to residential, estimated 70-80 dwellings

Issues and constraints: Fringes of site are within Flood Zone 2 and partly Flood Zone 3. Identified potential for contamination across whole site. Noise impacts from [IDR](#). Need to consider implications on Thames Valley Major Landscape Feature. Within Air Quality Management Area. There is an existing pedestrian link through Norman Place between Vastern Road and the River Thames. Loss of existing employment space would require justification. Close to existing residential block at Thames Court.

Other information: Within the town centre. Adjacent to existing allocation of the Station/River Major Opportunity Area (CR12).

Site Cen6: Reading Bridge House, George Street

Figure A2.6: Reading Bridge House, George Street (1:2,500)



Size (hectares): 0.4

Ward: Thames

Easting: 471800. **Northing:** 173970

Current use: Offices

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator: Residential development of 300-400 dwellings

Alternative option 1: Do not allocate, expected continuation in office use

Alternative option 2: Conversion of existing building to residential, estimated at around 200 dwellings

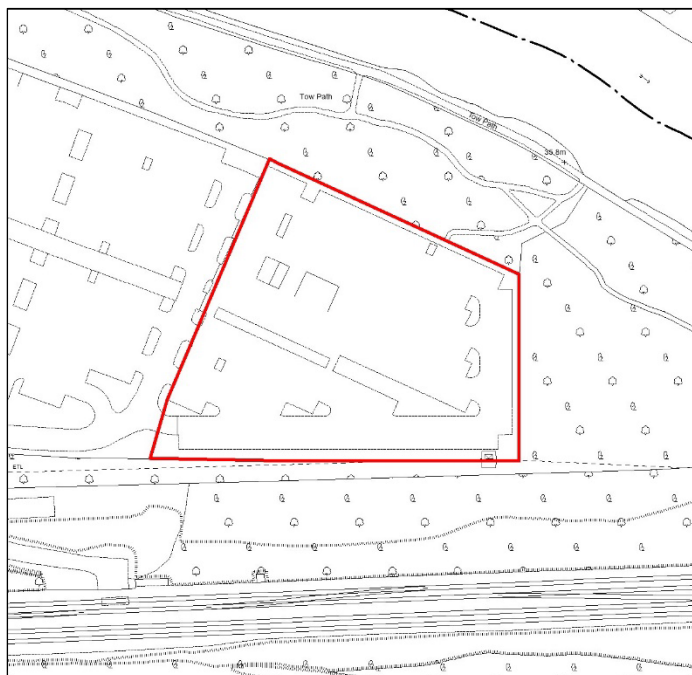
Alternative option 3: Residential development at general town centre densities, estimated at around 80-135 dwellings

Issues and constraints: Within Flood Zone 2. Trees subject to [Tree Preservation Order](#) surrounding the site. Identified potential for contamination across whole site. Potential noise impacts from [IDR](#). Need to consider implications on Thames Valley Major Landscape Feature. Within Air Quality Management Area. Loss of existing employment space would require justification. Narrow site and existing building, and the rise of Reading Bridge creates changes in levels. Within area of archaeological potential. The adjacent Reading Bridge is [locally listed](#).

Other information: Within the town centre. Adjacent to existing allocation of the Station/River Major Opportunity Area (CR12).

Site Cen7: Tesco Extra, Napier Road

Figure A2.7: Tesco Extra, Napier Road (1:2,500)



Size (hectares): 0.88

Ward: Thames

Easting: 472660. **Northing:** 173920

Current use: Part of superstore car park

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator: Residential development of 150-200 dwellings.

Alternative option 1: Do not allocate.

Alternative option 2: Additional retail development.

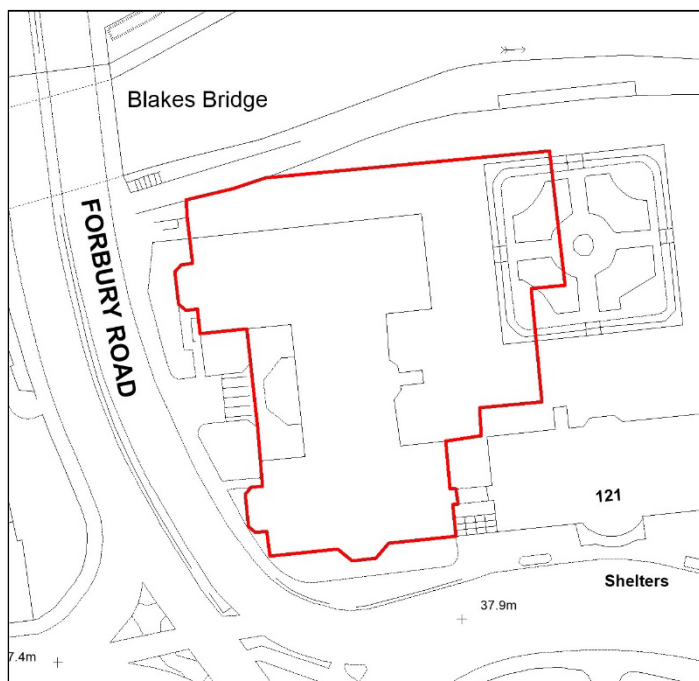
Alternative option 3: Residential development at more typical urban densities, approximately 100 dwellings.

Issues and constraints: Whole of site is within Flood Zone 2. All trees within car park subject to [Tree Preservation Order](#). Potential impacts on Thames Valley Major Landscape Feature and adjoining areas of biodiversity importance. Part of site within Air Quality Management Area. An existing [Crossrail](#) Safeguarding Direction covers the site, and this appears to still be in effect even though Crossrail works in the area are complete and the land is not required.

Other information: Within the defined town centre.

Site Cen8: Kennet Place, Kings Road

Figure A2.8: Kennet Place, Kings Road (1:1,250)



Size (hectares): 0.29

Ward: Thames

Easting: 472200. **Northing:** 173440

Current use: Offices.

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator: Conversion to approximately 70 apartments.

Potential alternative option 1: Do not allocate

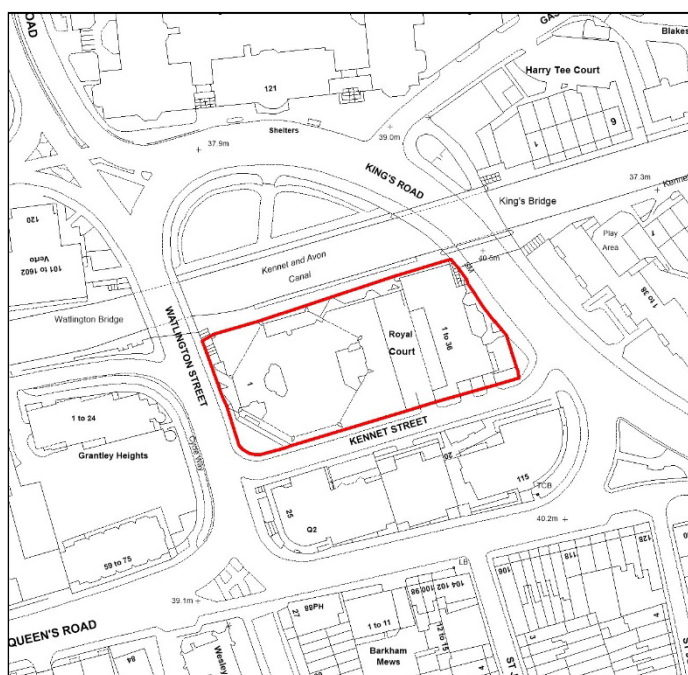
Potential alternative option 2: Redevelopment for residential at typical town centre densities, approximately 60-100 dwellings.

Issues and constraints: Site subject to potential contamination. Noise from [IDR](#). Within Air Quality Management Area. Loss of employment space would require justification. Existing trees and hedges in the courtyard to the rear of the building. Nearby Grade II listed Prison and [locally listed](#) Huntley and Palmers Building and Kings Road Garden. Within area of archaeological potential.

Other information: Within the town centre.

Site Cen9: Sapphire Plaza, Watlington Street and Royal Court, Kings Road

Figure A2.9: Sapphire Plaza, Watlington Street and Royal Court, Kings Road (1:2,500)



Size (hectares): 0.4

Ward: Abbey

Easting: 472260. **Northing:** 173330

Current use: Office, residential

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator: Residential development of 250-400 dwellings (215-365 net gain) and around 3,000 sq m of commercial space.

Potential alternative option 1: Do not allocate.

Potential alternative option 2: Residential development at general town centre densities of 80-135 dwellings (45-100 net gain).

Potential alternative option 3: Redevelopment of Sapphire Plaza for residential (approximately 50-85 dwellings) together with refurbishment of Royal Court.

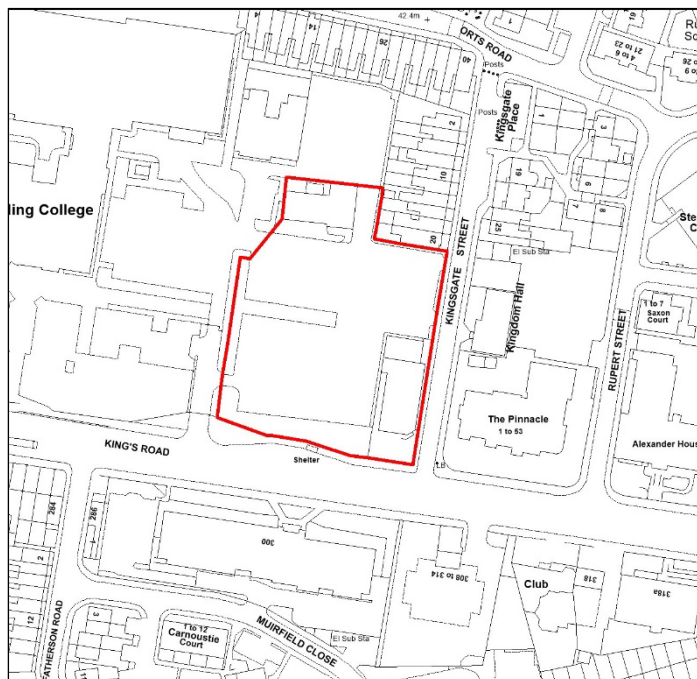
Potential alternative option 4: Conversion of Sapphire Plaza to residential (approximately 70 dwellings) together with refurbishment of Royal Court.

Issues and constraints: Northern edge of the site is within Flood Zone 2. Adjacent to the Inner Distribution Road, with potential impacts in terms of road noise. Also within an Air Quality Management Area. There are potential contamination issues across the site. The suggested development would result in the loss of existing residential in Royal Court, amounting to 36 dwellings. There would also be a loss of employment floorspace at Sapphire Plaza, which would require justification.

Other information: Sapphire Plaza had received prior approval for a conversion to 85 dwellings, but this has now expired. Within the town centre.

Site Cen10: Part of Reading College, Kings Road

Figure A2.10: Part of Reading College, Kings Road



Size (hectares): 0.51

Ward: Thames

Easting: 472820. **Northing:** 173280

Current use: Part of college, theatre, car park

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator: Mixed use or residential development with around 45 dwellings.

Alternative option 1: Do not allocate

Alternative option 2: Residential development of site excluding the part occupied by the theatre to ensure that this important use is not lost. This would result in a small reduction of the site to 0.44 ha.

Alternative option 3: Development for continued education use.

Issues and constraints: Trees within site are subject to [Tree Preservation Order](#). Loss of community and cultural use, with the Reading Rep Theatre in particular having recently opened. Within Air Quality Management Area. Impacts on existing car parking for the college, and potential access issues onto Kings Road.

Other information: Within the town centre.

Site Sou1: Reading Link Retail Park

Figure A2.11: Reading Link Retail Park (1:5,000)



Size (hectares): 2.03

Ward: Coley

Easting: 471160. **Northing:** 172180

Current use: Retail park

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator: Residential and retail development for 200 homes and 2,300 sq m of retail use.

Potential alternative option 1: Do not allocate

Potential alternative option 2: Residential development only (estimated similar number of dwellings)

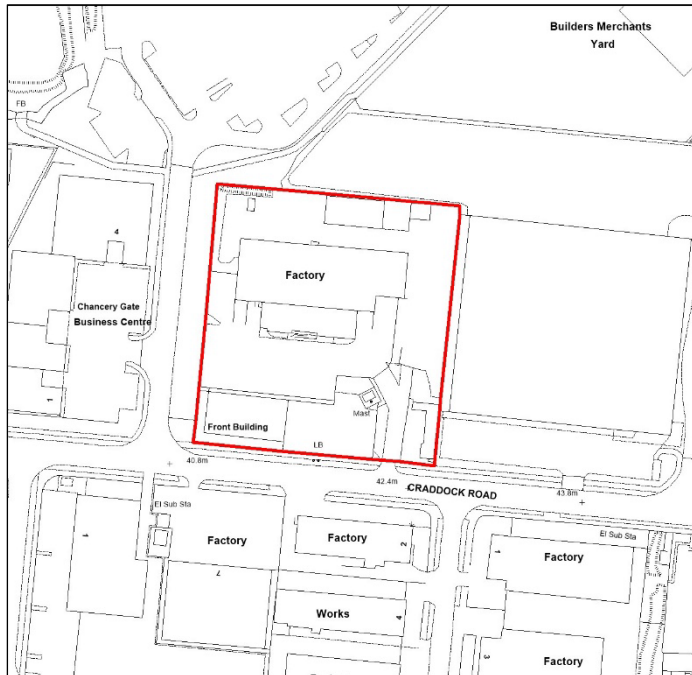
Potential alternative option 3: Residential development only with particular focus on family housing (estimated 100 to 150 dwellings)

Issues and constraints: The very fringe of the site is within Flood Zone 2. Site affected by [Tree Preservation Orders](#), including a large number at the edge of the site. Part of site subject to potential contamination. Noise from the adjacent A33. Within Air Quality Management Area. Partly within area of archaeological potential.

Other information: A drive-through coffee shop has very recently been built on the site.

Site Sou2: Tunbridge Jones, Cradock Road

Figure A2.12: Tunbridge Jones, Cradock Road (1:2,500)



Size (hectares): 0.69

Ward: Katesgrove

Easting: 471620. **Northing:** 171570

Current use: Industrial

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator: Residential development of 72-96 dwellings

Potential alternative option 1: Do not allocate

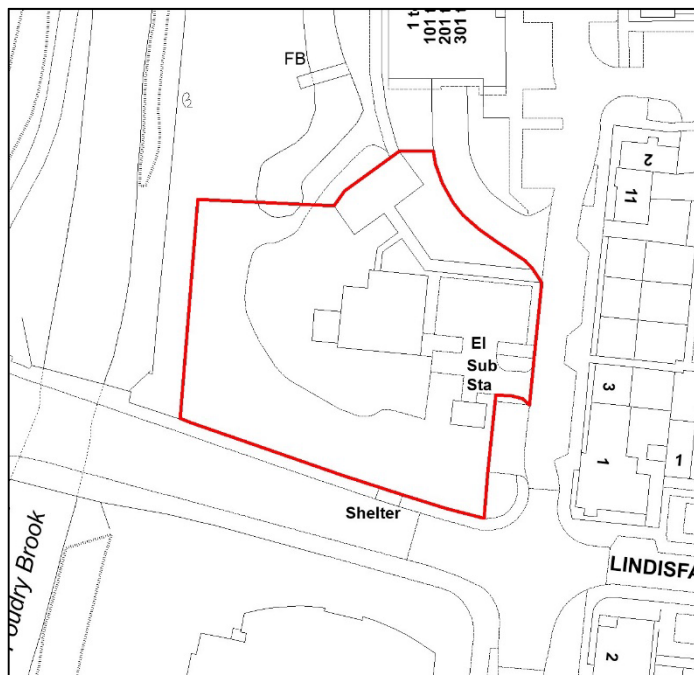
Potential alternative option 2: Development for employment uses.

Issues and constraints: Site is currently protected as part of a Core Employment Area, and is currently surrounded on all sides by commercial and industrial uses which would have significant amenity implications for any residents. Potential contamination across much of the site.

Other information: Adjacent to South of Island Road Major Opportunity Area (SR3).

Site Sou3: Former Sales and Marketing Suite, Drake Way

Figure A2.13: Former Sales and Marketing Suite, Drake Way (1:1,250)



Size (hectares): 0.25

Ward: Whitley

Easting: 471190. **Northing:** 170770

Current use: Vacant former marketing building

Source of nominated site: Developer submission to call for sites

Development suggested by nominator: Residential development of 23 dwellings.

Potential alternative option 1: Do not allocate

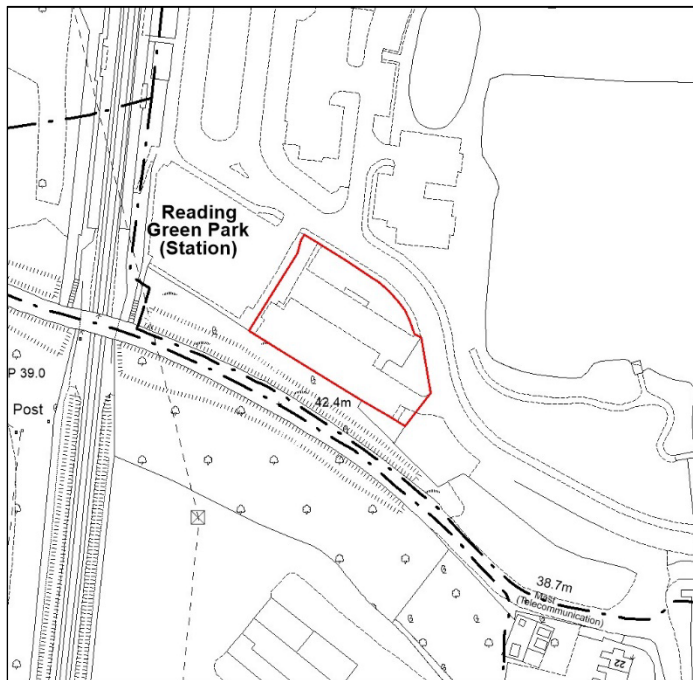
Potential alternative option 2: Residential development of 14 dwellings in line with expired permission.

Issues and constraints: Site subject to potential contamination associated with former sewage works use. Importance of retaining landscaped entrance to Kennet Island.

Other information: Planning permission was granted for 14 dwellings was granted but has since expired.

Site Sou4: Site at Green Park Village, Flagstaff Road

Figure A2.14: Site at Green Park Village, Flagstaff Road (1:2,500)



Size (hectares): 0.24

Ward: Whitley

Easting: 469600. **Northing:** 170100

Current use: Temporary construction compound

Source of nominated site: Developer submission to call for sites

Development suggested by nominator: Residential development of 50 dwellings including affordable housing

Potential alternative option 1: Do not allocate.

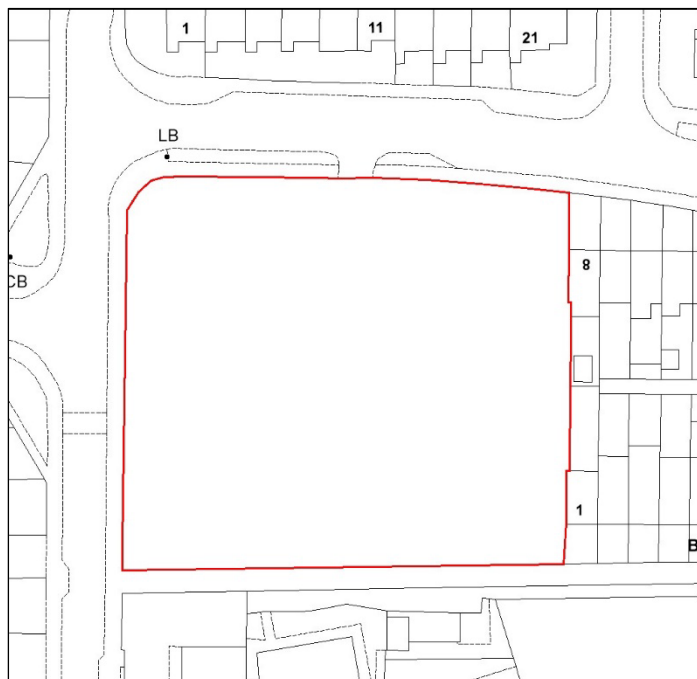
Potential alternative option 2: Development for office and commercial uses

Issues and constraints: Site is within Detailed Emergency Planning Zone for AWE Burghfield. Within Flood Zone 2, albeit that development for multi-storey car park has already been permitted.

Other information: Site was originally permitted for a multi-storey car park associated with the Green Park Station and interchange, but this is no longer required. Adjoins boundary with West Berkshire District Council.

Site Sou5: 2 Hexham Road

Figure A2.15: 2 Hexham Road (1:1,250)



Size (hectares): 0.46

Ward: Redlands

Easting: 472240. **Northing:** 171430

Current use: Cleared site

Source of nominated site: Council-owned site

Development suggested by nominator: Residential development

Potential alternative option 1: Do not allocate.

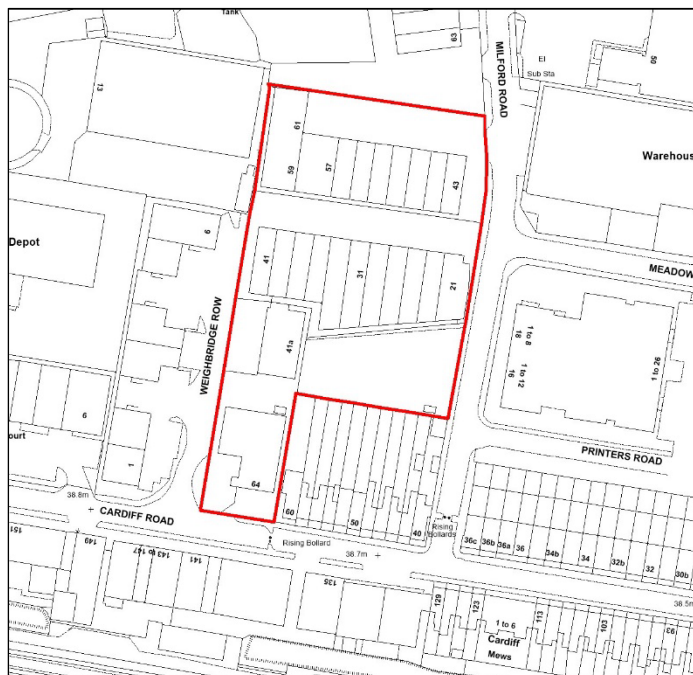
Potential alternative option 2: Development for community uses.

Issues and constraints: A number of significant trees on site. Public footpath along southern boundary of the site. Adjoins residential to the east.

Other information: Site of former care premises, now cleared.

Site Wes1: Land west of Milford Road

Figure A2.16: Land west of Milford Road (1:2,500)



Size (hectares): 0.86

Ward: Thames

Easting: 470830. **Northing:** 174160

Current use: Industrial uses, former car park.

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator: Residential development of around 70 dwellings

Potential alternative option 1: Do not allocate

Potential alternative option 2: Residential development of only vacant land, approximately 10-15 dwellings.

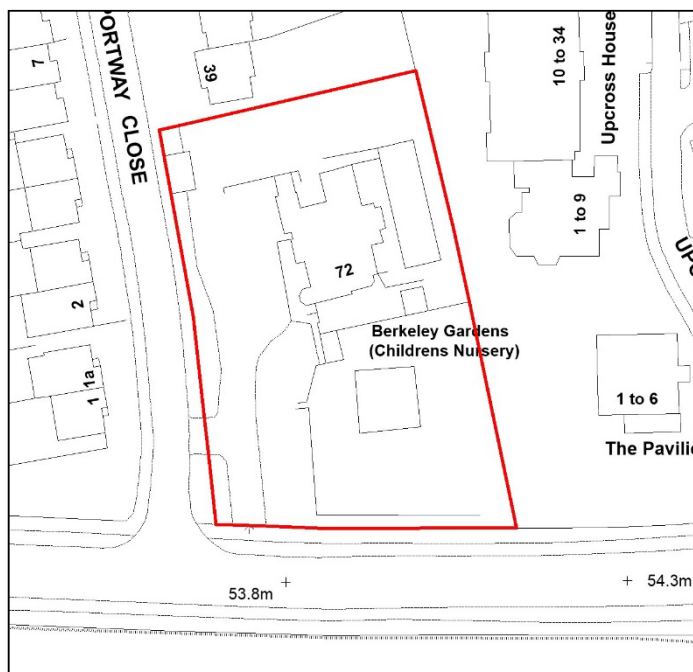
Potential alternative option 3: Redevelopment for employment uses

Issues and constraints: Site is currently protected as part of a Core Employment Area (other than unused former Cox & Wyman car park), and adjoins industrial uses which would have significant amenity implications for any residents. Units are suitable for small businesses. Within Flood Zone 2. Potential contamination across much of the site. Within Air Quality Management Area. Also adjoins residential uses to the south.

Other information: None

Site Wes2: 72 Berkeley Avenue

Figure A2.17: 72 Berkeley Avenue (1:1,250)



Size (hectares): 0.33

Ward: Coley

Easting: 470500. **Northing:** 172560

Current use: Nursery

Source of nominated site: Agent submission to call for sites

Development suggested by nominator: Residential use

Potential alternative option 1: Do not allocate

Potential alternative option 2: Residential conversion only (estimated at 10-12 dwellings)

Potential alternative option 3: Residential redevelopment (estimated at 25-35 dwellings)

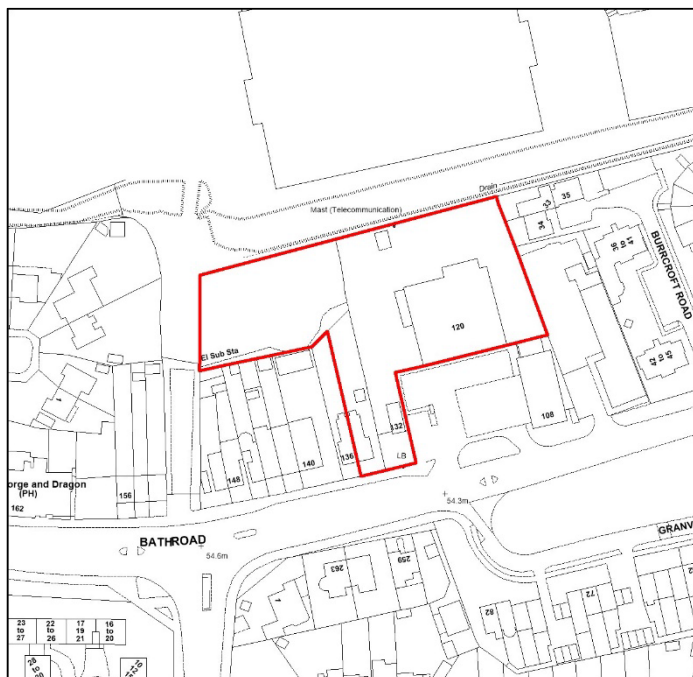
Potential alternative option 4: Conversion plus additional development (estimated at 20-30 dwellings)

Issues and constraints: A number of trees subject to [Tree Preservation Order](#) are on site. The building is in an existing community use and the loss of this use would therefore need to be justified. The existing building is likely to be considered a non-designated heritage asset.

Other information: The suggestion is that this site would become available once a nursery has opened at Yeomanry House (which is allocated in the existing Local Plan as WR3e), but this has not yet taken place.

Site Wes3: Land at 132-134 Bath Road

Figure A2.18: Land at 132-134 Bath Road (1:2,500)



Size (hectares): 0.51

Ward: Southcote

Easting: 468320. **Northing:** 172220

Current use: Industrial, car dealership and workshops

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator (1): Residential development only (estimated 44 dwellings)

Development suggested by nominator (2): Mixed use commercial and residential

Potential alternative option 1: Do not allocate

Potential alternative option 2: Residential development at typical suburban densities (approximately 20-25 dwellings)

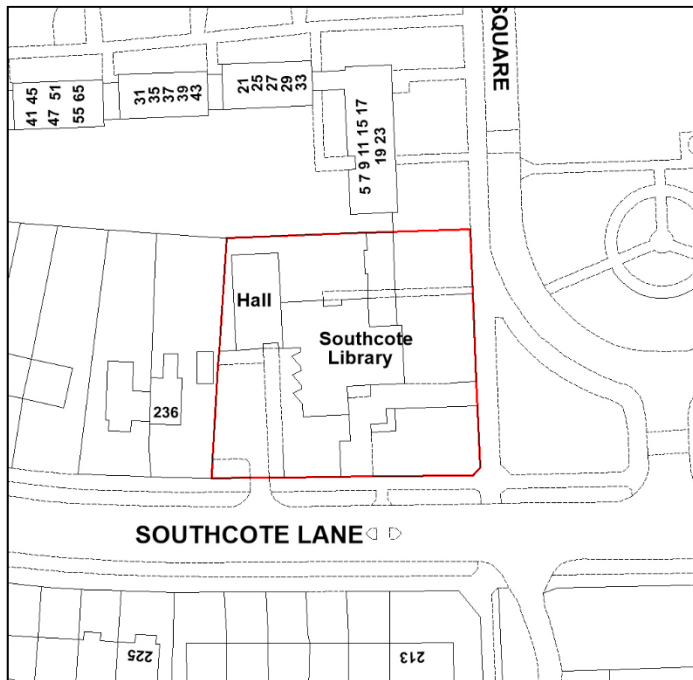
Potential alternative option 3: Redevelopment for employment uses.

Issues and constraints: Much of site subject to potential contamination. Within Air Quality Management Area. Loss of employment space would require justification. There is some vacant land within the site, but the existing narrow access would restrict its potential, so a more comprehensive development of the whole site may be necessary. Significant tree cover along the boundary, in particular the northern boundary. Telegraph pole and post box in front of the point where access would be required.

Other information: None

Site Wes4: Southcote Library, 234 Southcote Lane

Figure A2.19: Southcote Library, Southcote Lane (1:1,250)



Size (hectares): 0.17

Ward: Southcote

Easting: 468770. **Northing:** 171880.

Current use: Former library and community hall

Source of nominated site: Council-owned site.

Development suggested by nominator: Residential development

Potential alternative option 1: Do not allocate.

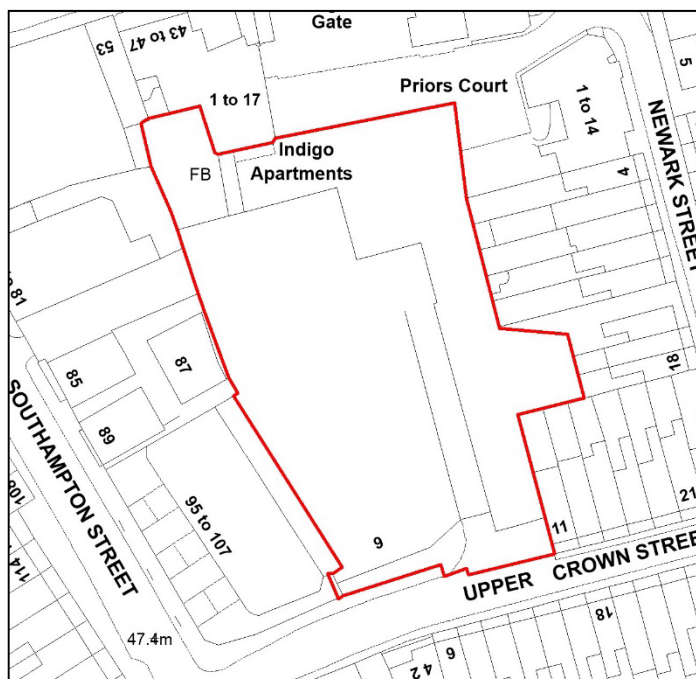
Potential alternative option 2: Development for community uses

Issues and constraints: Some trees and bushes on site. Loss of community use would require justification. Adjoins residential properties to west and north.

Other information: None.

Site Eas1: Land at 9 Upper Crown Street

Figure A2.20: Land at 9 Upper Crown Street (1:1,250)



Size (hectares): 0.35

Ward: Katesgrove

Easting: 471770. **Northing:** 172780

Current use: Car park

Source of nominated site: Landowner submission to call for sites

Development suggested by nominator: Residential development of around 46 dwellings.

Potential alternative option 1: Do not allocate

Potential alternative option 2: Residential development at typical urban densities of approximately 25-40 dwellings.

Issues and constraints: To the rear of a significant amount of existing residential. Potential contamination across much of site. Within Air Quality Management Area. Would likely result in significant overlooking of nearby residential gardens.

Other information: Planning application (211614) for development for 46 dwellings was refused and dismissed at appeal.

Appendix 3: Schedule of consultation questions

Please note that it is not expected that respondents will answer every question. Please answer only those questions that you wish to respond to.

Q1: Do you agree with the changes to the sustainability objectives to be used in carrying out sustainability appraisal?

Q2: How should the Climate Emergency be reflected in the vision and objectives?

Q3: Do you have any comments on the suggested changes to the vision, objectives and spatial strategy?

Q4: Do you agree with the proposed plan period of 2023 to 2041?

Q5: Do you agree with the list of strategic policies?

Q6: Do you agree that we should update the cross-cutting policies listed?

Q7: Do you agree that we should update policy CC2 as described? Are there other changes that are required?

Q8: Do you agree that we should update policy CC3 as described? Are there other changes that are required?

Q9: Do you agree that we should update policy CC4 as described? Are there other changes that are required?

Q10: Do you agree that we should update policy CC7 as described? Are there other changes that are required?

Q11: Do you agree that we should update policy CC9 as described? Are there other changes that are required?

Q12: Do you agree that we should update the built and natural environment policies listed?

Q13: Do you agree that we should update policy EN4 as described? Are there other changes that are required?

Q14: Do you agree with the proposed amendments to the boundaries of the existing Local Green Spaces and Public Open Spaces?

Q15: Do you consider that Land at Kentwood Hill (WR3s) and Land at Armour Hill (WR3t) would qualify as Local Green Space?

Q16: Do you agree that Ibis Club and Scours Lane be designated as Local Green Space?

Q17: Do you agree with the proposed level of biodiversity net gain to be sought?

Q18: Do you agree with the proposed approach to off-site Biodiversity Net Gain provision?

Q19: Do you have any other comments on how Biodiversity Net Gain is to be addressed?

Q20: Do you agree with the proposed additions to policy EN12 as a result of the Biodiversity Action Plan?

Q21: Do you agree that, in the event of land in Reading being identified for inclusion within the Chilterns AONB, we should update policy EN13 as described? Are there other changes that are required?

Q22: Do you agree that we should update policy EN14 as described to take account of the Tree Strategy and other matters?

Q23: Do you agree that we should update the employment policies listed?

Q24: Are you aware of anything else that should be factored into an update to policy EM1?

Q25: Do you have any comments on how policy EM2 should be updated?

Q26: Do you agree that we should update the housing policies listed?

Q27: Do you have any comments on the amount of housing that Reading should be planning for?

Q28: Do you have any comments on how the issue of a shortfall in identified needs is proposed to be addressed?

Q29: Do you agree with the proposed update to policy H2 to incorporate minimum densities?

Q30: Do you agree with the proposed increased focus on family housing in policy H2?

Q31: Do you agree with the proposed update to policy H2 to strengthen the wording on self-build?

Q32: Do you agree with the proposals for incorporating First Homes into policy H3 as described?

Q33: Do you agree with the inclusion of a requirement for a deferred contribution in policy H3?

Q34: Do you agree with the inclusion of the proposed approach to instances where a Registered Provider cannot be found to take on affordable housing units?

Q35: Do you agree with the proposed update to policy H4 around rolling tenancies forward?

Q36: Do you agree that we should update policy H5 as described? Are there other changes that are required?

Q37: Do you agree that we should update policy H6 as described?

Q38: Do you agree that we should update policy H7 as described to allow for increases in family housing?

Q39: Do you agree that we should update policy H8 as described to address issues with implementation of the policy?

Q40: Do you agree that we should update policy H14 as described to identify specific opportunities for suburban renewal and regeneration?

Q41: Do you agree that a new policy on co-living should be included?

Q42: Do you agree with the proposed policy direction on co-living?

Q43: Do you agree that we should update the transport policies listed?

Q44: Do you agree with the proposed updates to policy TR1 to reflect the Transport Strategy 2040?

Q45: Do you agree with the proposed updates to policy TR2 to show an updated list of major transport projects?

- Q46: Do you agree with the proposed updates to policy TR4 to reflect the LCWIP?
- Q47: Do you agree with the proposed updates to policy TR5 regarding electric vehicle charging?
- Q48: Do you agree that we should update the retail, leisure and culture policies listed?
- Q49: Are you aware of anything else that should be factored into an update to policy RL2?
- Q50: Do you agree that we should update policy RL3 as described to reflect permitted development rights?
- Q51: Do you agree that we should update policy RL4 as proposed to address other gambling establishments?
- Q52: Do you agree that we should update the policies for other uses listed?
- Q53: Do you agree with the changes proposed to reflect the extension of the DEPZ for AWE Burghfield? Are there other changes that are required?
- Q54: Do you agree with the changes proposed to policy OU3?
- Q55: Do you agree that we should update the area-specific and site allocation policies listed?
- Q56: Do you agree that we should update policy CR2 as described? Are there other changes that are required?
- Q57: Do you have any comments on whether and how policy CR5 should be updated?
- Q58: Do you agree that we should update policy CR6 to seek a greater contribution towards family housing?
- Q59: Do you agree that we should update policy CR7 as described to reflect changes in use classes?
- Q60: Do you have any comments on the proposed amendments to reflect progress on sites within the Station/River Major Opportunity Area?
- Q61: Do you have any views on the amendments to CR11d that have been suggested to us?
- Q62: Do you have any comments on the proposed amendments to reflect progress on sites within the West Side Major Opportunity Area?
- Q63: Do you have any views on the amendment to CR12a at the Cattle Market that has been suggested to us?
- Q64: Do you have any comments on the proposed amendments to reflect progress on sites within the East Side Major Opportunity Area?
- Q65: Do you agree with the proposed changes to CR13a to increase the emphasis on culture and heritage?
- Q66: Do you have any views on the amendment to CR13c on Kenavon Drive and Forbury Business Park that has been suggested to us?
- Q67: Do you agree with the proposed changes to the existing allocated sites in Central Reading? Do you want to see any other changes?

Q68: Do you have any comments on any of the potential additional allocations to policy CR14?

Q69: Do you have any comments on the proposed changes to policy CR14 regarding the Abbey Quarter?

Q70: Do you have any comments on the proposed changes to policy SR1 regarding the Island Road area?

Q71: Do you agree with the proposed changes to the existing allocated sites in South Reading? Do you want to see any other changes?

Q72: Do you have any comments on the potential additional allocations to policy SR4?

Q73: Do you agree with the proposed update to policy SR5 to reflect potential proposals at Kennet Meadows?

Q74: Do you agree with the proposed changes to the existing allocated sites in West Reading and Tilehurst? Do you want to see any other changes?

Q75: What is your view on the suggested changes to sites WR3s and WR3t?

Q76: Do you have any comments on the potential additional allocations to policy WR3?

Q77: Do you agree with the proposed changes to the existing allocated sites in Caversham and Emmer Green?

Q78: Do you agree with the proposed changes to the existing allocated sites in East Reading? Do you want to see any other changes?

Q79: Do you have any comments on the potential additional allocation to policy ER1?

Q80: Do you agree that we should update policy ER2 regarding Whiteknights Campus as described?

Q81: Do you agree that we should update policy ER3 regarding Royal Berkshire Hospital as described?

Q82: Have all the relevant areas of infrastructure been correctly identified?

Q83: Do you have any comments on the draft IDP schedule?

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