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1 July 2013

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NOTICE OF MEETING -STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT COMMITTEE - 9 JULY 2013

A meeting of the Strategic Environment, Planning and Transport Committee will be held on Tuesday 9 July 2013 at 6.30pm in the Council Chamber, Civic Offices, Reading. The meeting Agenda is set out below.

AGENDA

| | <u>WARDS AFFECTED</u> | <u>PAGE NO</u> |
|--|-----------------------|----------------|
| 1. DECLARATIONS OF INTEREST | | |
| 2. MINUTES OF THE MEETING OF THE STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT COMMITTEE HELD ON 22 MAY 2013 | | 1 |
| 3. MINUTES OF THE MEETING OF THE TRAFFIC MANAGEMENT SUB-COMMITTEE OF 13 JUNE 2013 | | 2 |
| 4. MINUTES OF OTHER BODIES | | |
| (A) READING CLIMATE CHANGE PARTNERSHIP BOARD, 23 JANUARY 2013 | | 18 |
| (B) JOINT WASTE DISPOSAL BOARD, 14 MARCH 2013 | | 21 |

CIVIC CENTRE EMERGENCY EVACUATION: Please familiarise yourself with the emergency evacuation procedures, which are displayed inside the Council's meeting rooms. If an alarm sounds, leave by the nearest fire exit quickly and calmly and assemble at the Hexagon sign, at the start of Queen's Walk. You will be advised when it is safe to re-enter the building.

| | | | |
|-----|---|-------------|-----|
| 5. | PETITIONS | | - |
| | <p>Petitions submitted pursuant to Standing Order 36 in relation to matters falling within the Committee's Powers & Duties which have been received by Head of Legal & Democratic Services no later than four clear working days before the meeting.</p> | | |
| 6. | QUESTIONS FROM COUNCILLORS AND MEMBERS OF THE PUBLIC | | - |
| | <p>Questions submitted pursuant to Standing Order 36 in relation to matters falling within the Committee's Powers & Duties which have been submitted in writing and received by the Head of Legal & Democratic Services no later than four clear working days before the meeting.</p> | | |
| 7. | DECISION BOOK REFERENCES | | - |
| | <p>To consider any requests received by the Monitoring Officer pursuant to Standing Order 42, for consideration of matters falling within the Committee's Powers & Duties which have been the subject of Decision Book reports.</p> | | |
| 8. | DRAFT READING CLIMATE CHANGE STRATEGY 2013-2020 'READING MEANS BUSINESS ON CLIMATE CHANGE' | BOROUGHWIDE | 25 |
| | <p>To consider and comment on the draft Strategy.</p> | | |
| 9. | DRAFT REVISED S106 PLANNING OBLIGATIONS SUPPLEMENTARY PLANNING DOCUMENT | BOROUGHWIDE | 98 |
| | <p>To set out the key changes included in the Draft Revised S106 Planning Obligations Supplementary Planning Document.</p> | | |
| 10. | SUPPLEMENTARY PLANNING DOCUMENT: AFFORDABLE HOUSING REPORT OF CONSULTATION AND ADOPTION | BOROUGHWIDE | 132 |
| | <p>To provide the results of consultation on the draft Supplementary Planning Document (SPD) on Affordable Housing that was approved by Cabinet in November 2012 and to seek adoption of the revised SPD document.</p> | | |
| 11. | LOCAL DEVELOPMENT SCHEME | BOROUGHWIDE | 171 |
| | <p>To seek approval to a Draft Local Development Scheme, setting out the planning policy documents that the Council intends to produce.</p> | | |
| 12. | THE BUILDING (LOCAL AUTHORITY CHARGES) REGULATIONS 2010 - AMENDING THE SCHEME OF DELEGATION | BOROUGHWIDE | 207 |
| | <p>To inform the Committee of a proposed change to the scheme of delegation in the method of setting charges for the statutory building regulation function.</p> | | |

- | | | | |
|-----|--|-------------|-----|
| 13. | FLOOD & WATER MANAGEMENT ACT 2010 - LEAD LOCAL FLOOD AUTHORITY DUTIES: DELEGATION OF AUTHORITY TO HEAD OF HIGHWAYS & TRANSPORT | BOROUGHWIDE | 210 |
| | To seek the Committee's approval to delegate authority to the Head of Highways and Transport to carry out the Lead Local Flood Authority Duties as set out in the Flood & Water Management Act 2010 and Flood Risk Regulations 2009. | | |
| 14. | DEPARTMENT FOR TRANSPORT - PINCH POINT FUNDING | BOROUGHWIDE | 217 |
| | To update the Committee on the Pinch Point applications that the Council submitted to the Department for Transport for improvements to the highway network to improve traffic flow. | | |

STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT COMMITTEE MINUTES - 22
MAY 2013

Present: Councillor Maskell (Chair)

Councillors Ayub, Duveen, K Edwards, Gittings, Harris, Page,
Ruhemann, Stanway, Tickner, White and Willis.

RESOLVED ITEM

1. ESTABLISHMENT, MEMBERSHIP AND TERMS OF REFERENCE OF TRAFFIC
MANAGEMENT SUB-COMMITTEE

Resolved -

- (1) That, under the provisions of Sections 101 and 102 of the Local Government Act 1972, a Traffic Management Sub-Committee be established for the Municipal Year 2013-14 and the following Councillors be appointed to serve on the Sub-Committee:

Traffic Management Sub-Committee (7:3:1:1)

| <u>Labour</u> <u>Councillors</u> | <u>Conservative</u> <u>Councillors</u> | <u>Liberal Democrat</u> <u>Councillor</u> | <u>Green</u> <u>Councillor</u> |
|-------------------------------------|---|--|-----------------------------------|
| Ayub | Anderson | Duveen | Whitham |
| Davies | Hopper | | |
| Hacker | Willis | | |
| T Jones | | | |
| Page | | | |
| Rodda | | | |
| Terry | | | |

- (2) That the following Councillors be appointed as Chair/Vice-Chair of the Traffic Management Sub-Committee for the Municipal Year 2013/14:

| <u>Chair</u> | <u>Vice-Chair</u> |
|-----------------|-------------------|
| Councillor Page | Councillor Ayub |

- (3) That the Terms of Reference of the Sub-Committee be as set out in Appendix B to the Monitoring Officer's report to Council of 22 May 2013 on the Constitution, Powers and Duties of the Council and Committees etc.

TRAFFIC MANAGEMENT SUB-COMMITTEE MINUTES - 13 JUNE 2013

Present: Councillors Page (Chair), Anderson, Ayub, Davies, Duveen, Hacker, Hopper, T Jones, Rodda, Terry, Whitham and Willis.

Also in attendance: Councillors Eastwood, Stevens and White.

1. FORMER TRANSPORT USERS' FORUM - CONSULTATIVE ITEMS

(a) Questions

The Chair circulated a written response to the following question:

| <u>Questioner</u> | <u>Subject</u> |
|-------------------|---------------------------|
| Stephen Derek | Town Centre Cycling Route |

(b) Highway Maintenance - Presentation

Anthony Bolton, Head of Highways and Transport, gave a presentation and answered questions on highway maintenance. He also outlined a new pothole repair plan that had been agreed by the Policy Committee at its meeting on 10 June 2013 (see Minute 15 below).

Resolved -

- (1) That Anthony be thanked for his presentation;
- (2) That an update on the pothole repair plan be submitted to the next Sub-Committee meeting on 12 September 2013.

2. MINUTES OF TRAFFIC MANAGEMENT ADVISORY PANEL

The Minutes of the meeting of the former Traffic Management Advisory Panel of 14 March 2013 were confirmed as a correct record and signed by the Chair.

3. GREAT KNOLLYS STREET PARKING RESTRICTIONS - REPRESENTATIONS FROM BUSINESSES

The Director of Environment, Culture and Sport submitted a report on the receipt of representations from several businesses of Great Knollys Street requesting a review of the waiting restrictions in the road. A location plan was attached at Appendix 1.

The report stated that representations had recently been received from several businesses in Great Knollys Street regarding the existing waiting restrictions in the road. The businesses had complained that the loading and unloading restrictions were too prohibitive to allow regular business operations and possibly related to the previous road layout, when Great Knollys Street had been a through road.

At the invitation of the Chair, John Holland spoke on this item.

Resolved -

- (1) That the representations be noted;
- (2) That the issue be urgently investigated and included in the next annual waiting restrictions review programme;

(3) That the businesses be informed accordingly.

4. BROOMFIELD ROAD - RESPONSE TO PETITION

The Director of Environment, Culture and Sport submitted a report informing the Sub-Committee of investigations carried out in Broomfield Road following receipt of a petition from some residents of the road reported to the Traffic Management Advisory Panel on 17 January 2013 (Minute 52 refers).

The report stated that officers had, at the Panel's request, investigated three possible closure points on Broomfield Road: at the Norcot Road junction, at a mid point, and at the Romany Lane junction. A Plan indicating these closure points was attached to the report at Appendix 1. Officers had immediately concluded that a mid-point closure could not be progressed due to a lack of space between existing driveways. A closure at Norcot Road was potentially easier to achieve, as there would be no need to provide a turning head, and the junction of Glenrosa Road would be the most appropriate location for a closure at this end of Broomfield Road. The third location, at the Romany Lane end of Broomfield Road, was the location which the majority of the petitioners were in favour of, although this would involve the construction of a turning head.

The report noted that any closure of Broomfield Road would result in additional pressure on an alternative road junction. By closing Broomfield Road at the Norcot Road junction all traffic now exiting onto Norcot Road would have to do so via Romany Lane. This would increase traffic within another residential street and increase turning movements at the Romany Lane junction with Norcot Road.

The creation of a one-way plug at Romany Lane, allowing drivers within Broomfield Road to pass through in one direction, had also been investigated. This would not stop the perceived rat running from Norcot Road to Romany Lane, but allowing vehicles to exit would overcome the issue of providing a turning head. The cost of a one-way plug was likely to be around £15k as it required illuminated signs to conform to the regulations. There would also be a concern over abuse of the restriction by drivers.

The report explained that costs to close a road at a junction would vary greatly depending upon the materials used and the final appearance of the closure point. The cheapest option would be to place a row of bollards across the road, but placing kerbs across the junction was typically expected as well. Creating a turning head within Broomfield Road at the Romany Lane end might require significant funding, as a kerbed closure and construction of a turning head also required drainage work. The costs of different forms of closure were set out, all of which assumed that there was no impact to underground services. There was no budget available for the work and as previously reported there was no history of casualties as a result of speeding or traffic volume using Broomfield Road.

The report also contained the results of a 24-hour seven-day count undertaken in Broomfield Road between 25 February and 3 March 2013. The average speed recorded during this period had been 19.4mph and the 85th percentile had been 22.8mph. This was a significant drop from a survey carried out in 2008 in which the average speed recorded had been 24mph and the 85th percentile 29mph.

At the invitation of the Chair, Kirsty Hawkins spoke on this item.

Resolved -

TRAFFIC MANAGEMENT SUB-COMMITTEE MINUTES - 13 JUNE 2013

- (1) That closure of Broomfield Road not be progressed at the present time;
- (2) That Broomfield Road continue to be monitored as part of the Council's ongoing road safety strategy and the Vehicle Activated Sign be used when possible as part of the annual sign rotation schedule.

5. PRIVATE HIRE VEHICLES IN BUS LANES - RESULTS OF CONSULTATION

Further to Minute 55 of the meeting of the Traffic Management Advisory Panel of 17 January 2013, the Director of Environment, Culture and Sport submitted a report updating the Sub-Committee on consultation undertaken regarding the use of bus lanes by Private Hire Vehicles in Reading.

The responses to the consultation were attached to the report at Appendix 1, together with officer comments. The report stated that, of the responses received from the existing approved bus lane operators, there was a clear majority against any proposal to include Private Hire Vehicles in Reading bus lanes. Based on the consultation response, together with officer research, it was not recommended at this time to permit the use of Reading bus lanes by Private Hire Vehicles. The Sub-Committee noted that Reading Motorcycle Group had not been included in this informal consultation, but had previously expressed objections to the proposal to the Traffic Management Advisory Panel.

The report also explored the specific request for use of the new section of the eastbound Kings Road Bus Lane by Private Hire Vehicles, which as an extension of the existing bus lane had been carefully designed to ensure user consistency. The section of Kings Road between Orts Road and Cemetery Junction was unique in terms of the road layout as it currently provided two eastbound general traffic lanes, an eastbound "with flow" bus lane, and a westbound "contra-flow" bus lane. When this layout had first been introduced, the regulatory signs required to provide clarity to road users covering both bus lanes had required separate approval from the Department for Transport (DfT). Before any further authorisation for either bus lane the strict signing regulations and potential road safety implications had to be carefully measured, and detailed liaison with the DfT would be required. Officers therefore felt that, at this stage, there would be no benefit in allowing Private Hire Vehicles in the proposed new section of bus lane as they would have to rejoin the general traffic lanes prior to Orts Road which would cause confusion. The trial that had been running since 2007 on the Kings Road in-bound contra-flow bus lane did not conform to new guidance, which permitted licensed private hire vehicles to use near-side with-flow bus lanes only, and it was therefore also recommended that the trial be discontinued and the bus lane returned to its original status.

At the invitation of the Chair, John Purvis, representing the Private Hire Association, Asif Rashid, Chairman of the Reading Taxi Association, Peter Seymour, Reading Motorcycle Action Group, and Councillor White spoke on this item.

The Sub-Committee noted that there was no evidence that the trial use of the Kings Road in-bound contra-flow bus lane by Private Hire Vehicles had created any problems or issues for public transport or other road users, and it was proposed that the Chair be authorised to make representations to the Department for Transport, to try and enable the trial to be continued.

Resolved -

TRAFFIC MANAGEMENT SUB-COMMITTEE MINUTES - 13 JUNE 2013

- (1) That, based upon the responses received during the consultation as set out in Appendix 1, Private Hire Vehicles not be permitted in bus lanes in Reading;
- (2) That the Sub-Committee support the continued use of the Kings Road contra-flow bus lane by private hire vehicles;
- (3) That the Chair be authorised to make appropriate representations to the Department for Transport, to try and enable the use of the Kings Road contra-flow bus lane by private hire vehicles to be continued;
- (4) That all respondents to the consultation be informed accordingly.

(Councillor Ayub declared a pecuniary interest in this item and took no part in the debate or the decision. Nature of Interest: Councillor Ayub was employed as a Hackney Carriage driver).

6. OBJECTIONS TO TRAFFIC REGULATION ORDERS

The Director of Environment, Culture and Sport submitted a report informing the Sub-Committee of objections received in respect of traffic regulation orders, which had recently been advertised as part of the annual waiting restriction review programme, proposed Pay and Display operation in Thameside Promenade, and a proposed Residents Parking Scheme in Upper Redlands Road.

Annual Waiting Restriction Review Programme

The report stated that a total of 44 proposals had been advertised as part of the annual waiting restriction review and these were listed at Appendix 1. Eleven of these proposals had prompted letters of support or objection and these were detailed at Appendix 2, together with officer responses and recommendations.

The report noted that the proposal to implement No Waiting Mon-Sun 9am to 5pm for All Hallows Road had led to 29 residents' comments. The proposal had been put forward following concerns raised by the Cemetery and Crematorium about difficulties with accessing the site, especially for funeral processions. From the correspondence received, residents had empathy with the issues the Crematorium faced but believed residents should not be penalised with such a restriction. It was proposed at the meeting that the proposed restriction apply on weekdays only.

At the invitation of the Chair, Councillor White spoke on this item regarding the Brackendale Way proposals, for which no objections had been reported. He informed the Sub-Committee that he had submitted a response to the consultation.

Thameside Promenade Car Park

A summary of letters of comment and objection received following the advertisement of proposals for Pay and Display operation in Thameside Promenade was attached at Appendix 3. Additional comments and objections that had been received following publication of the meeting agenda were tabled at the meeting.

At the invitation of the Chair, John Ridge spoke on this item.

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The Chair proposed a revision to the proposals to amend the proposed hours of operation of the Thameside Promenade car park pay and display parking charges to Monday to Friday only (excluding Bank Holidays) between 9am and 5pm, with the first two hours being at nil charge.

Upper Redlands Road

A summary of letters of comment and objection received following the advertisement of a proposed Residents Parking scheme on the north side of Upper Redlands Road, together with officer comments, was attached at Appendix 4.

Reading Station Subway - Prohibition of Cycling

An additional report had been circulated separately, containing details of objections received in respect of a proposed traffic regulation order prohibiting cycling in the Reading Station subway. Attached at Appendix A was a table showing 11 letters of objection received, together with officer comments.

The report stated that cycling provision had been carefully designed on both sides of the Station to link with existing routes and provide shared facilities, either in the new bus lanes or the new shared footway/cycleways. The new routes provided access to the Station along Vastern Road and Forbury Road, and new cycle parking areas were also provided on both sides in the new public square areas.

The report explained that, during the design process, it had been clear that neither the Council as Highway Authority or Network Rail as the owner of the subway would support the use for cycling of the existing subway structure with its height limitations. The minimum height to the subway had been measured as 2.23m, and the national standard minimum height for a shared unsegregated cycle/pedestrian subway was 2.7m. There was nothing to prevent cyclists dismounting and pushing a bike through the subway.

At the invitation of the Chair, Councillor White spoke on this item.

Resolved -

- (1) That the following proposed waiting restrictions be implemented as advertised:
 - Luscombe Close/Lower Henley Road
 - Rufus Isaacs Road
 - School Lane (Caversham)
 - St Bartholomews Road
 - Micklands Road
 - Mayfield Drive/Rosendale Road
 - Berrylands Road/Newlands Avenue
 - Armour Road junctions;
- (2) That the Chair consult Ward Councillors on the proposed waiting restrictions at Grasmere Avenue, and that the scheme be implemented as advertised if there were no unresolved objections;
- (3) That the proposed restrictions in All Hallows Road be implemented with amended hours of operation of Monday to Friday No Waiting 9am-5pm;

- (4) That the proposals for Surley Row/Rotherfield Way not be implemented, and that a revised proposal extending the length of waiting restrictions be included in the next annual waiting restrictions review programme;
- (5) That officers check whether any objections or comments had been received regarding the proposals for Brackendale Way, and that the Chair be authorised to decide, in view of any objections or comments received, whether the proposals should be implemented as advertised or deferred for further consideration;
- (6) That the proposed hours of operation of the Thameside Promenade car park pay and display parking charges be amended to Monday to Friday only (excluding Bank Holidays) between 9am and 5pm, with the first two hours being at nil charge;
- (7) That the introduction of pay and display at Thameside Promenade car park be monitored and reported back to a future meeting of the Sub-Committee;
- (8) That the proposed residents permit parking restrictions in Upper Redlands Road be implemented as advertised;
- (9) That the Traffic Regulation Order prohibiting cycling in the Reading Station subway be implemented as advertised;
- (10) That the Head of Legal and Democratic Services be authorised to seal the resultant Traffic Regulation Orders, and no public inquiry be held into the proposals;
- (11) That the objectors be informed accordingly.

(Councillor Whitham declared a non-pecuniary interest in this item, on the basis that he lived in St Bartholomew's Road).

7. LOWER CAVERSHAM WEST - RESPONSE TO PARKING SURVEY

The Director of Environment, Culture and Sport submitted a report on an officer response to a parking survey carried out by Councillor Davies within the Lower Caversham area. Receipt of the parking survey had been reported to the Traffic Management Advisory Panel on 14 March 2013 (Minute 75 refers).

The report stated that over the previous few years officers had carried out an annual waiting restriction review to help manage the relatively significant number of parking related requests. The purpose of gathering all parking concerns together and reviewing them annually was to ensure best value due to the statutory legal and advertising costs required to make any formal waiting restriction legal.

As reported previously, the results of the parking survey differed greatly from street to street. It would require significant staff resources to properly review the survey results and carry out appropriate site checks and relevant data collection, and with staff resources already allocated to the annual waiting restriction review from September 2013 it was recommended that the parking survey be assessed as part of the review.

Resolved -

That the issues raised within the survey be investigated as part of the next annual waiting restriction review.

8. MILMAN ROAD, NEW CHRISTCHURCH SCHOOL - UPDATE

Further to Minute 56 of the meeting of the Traffic Management Advisory Panel on 17 January 2013, the Director of Environment, Culture and Sport submitted a report updating the Sub-Committee on the following issues in Milman Road which the Panel had requested further consideration of:

Reduction of the length of the dedicated ambulance bay

From site observations it appeared that the length of the ambulance bay exceeded the current demand, and that patient deliveries to the medical centre and doctors surgery could be carried out within a bay half the current length. However, if the length of the bay was reduced it was unlikely that the space created would have any effective use, as marked Residents Parking (RP) bays on the opposite side of Milman Road meant that the road was not wide enough to support parking on both sides, and the bay would have to be replaced with a yellow line restriction. Current use of the ambulance bay would block the road unless vehicles were parked on the footway. Any removal of the ambulance bay was likely to raise other issues and it was therefore proposed to consider the bay as a part of the annual waiting restriction review.

Reduction of the shared use provision within the RP bays creating some areas for residents only

Reduction of shared use provision within the RP bays would have a direct impact on all visitors to Milman Road. The whole RP provision in Milman Road was shared use 8am until 8pm (2 hours, no return within 2 hours), and with the school, medical centre and doctors surgery located there the extent of this shared use made it difficult for residents to park at times. Current policy for shared use in RP bays was 10am until 4pm (2 hours, no return within 2 hours) and the 8am until 8pm used in Milman Road pre-dated the current policy. Any change to the shared use within Milman Road was likely to prompt objections from non-residents, and it was therefore recommended that this be consulted on as a part of any other changes that were recommended as a result of the RP (parking areas) review.

Access to Milman Road by heavy good vehicles

Access to Milman Road by larger vehicles was required from time to time, not just for deliveries to the medical centre and school but residents themselves were visited by larger vehicles for deliveries, refuse collection, house moves etc. With changes to the loading restrictions at the junction of Spring Gardens, which had been agreed by the Traffic Management Advisory Panel on 17 January 2013 (Minute 56 refers), traffic flow and larger vehicle access might become less of an issue. It was therefore recommended to review the question of access to Milman Road by larger vehicles once all other changes have been considered.

Resolved -

- (1) That the ambulance bay be reviewed within the annual waiting restriction review;

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- (2) That any changes to the shared use provision within the Residents Parking bays be assessed as a part of the RP (parking areas) review;
- (3) That the access for HGVs be reviewed once the proposed loading bans on the corners of Spring Gardens had been consulted on and implemented.

9. COLLEGE ROAD/CULVER ROAD - RESPONSE TO PETITION FOR A RESIDENTS' PARKING SCHEME

The Director of Environment, Culture and Sport submitted a report on an officer response to a petition supported by some residents of College Road and Culver Road, requesting the introduction of a residents parking (RP) scheme (Minute 53 of the Traffic Management Advisory Panel of 17 January 2013 refers).

The report stated that the biggest challenge when considering RP schemes was gaining consensus from residents. Whilst RP might seem attractive to residents, as with any formal parking restriction there was a need for compromise as the schemes could be limiting, and it was so important that residents understood exactly what the impact would be. The recent introduction of RP within the Newtown area had followed many years of campaigning and consultation, with the majority of the consultation carried out by ward members with officer support where required. This had provided a good model and it was intended to follow a similar process when exploring RP in other areas.

The report noted that there appeared to be a good response to the survey from residents within College Road, but less so from those that lived in Culver Road. Of the responses received the idea of RP seemed attractive, but 52.5% wished to see options. Both College Road and Culver Lane appeared to meet the profile for RP, and could become part of the existing zone 14R, which currently included St Bartholomew's Rd, Palmer Park Avenue, Grange Avenue and Norris Road. How the RP scheme worked, the hours of operation, shared use provision and permit allocation would need to be explained to residents.

It was recommended that officers consider an RP scheme for both College Road and Culver Road and work with ward councillors in carrying out informal consultation. The result of this consultation would be reported back to a future meeting of the Sub-Committee.

At the invitation of the Chair, Helen Fogelman and Martin Appleton spoke on this item.

Resolved -

- (1) That the report be noted;
- (2) That further informal consultation be carried out in consultation with Ward Councillors;
- (3) That if residents remained supportive of a residents only permit parking scheme a further report be submitted to the Sub-Committee.

10. PLAY STREETS UPDATE

Further to Minute 76 of the meeting of the Traffic Management Advisory Panel of 14 March 2013, the Director of Environment, Culture and Sport submitted a report updating the Sub-Committee on progress on Play Streets.

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The report explained that an application process had been developed and residents could now download a Play Streets application form from the Council's website. Applications were open for one month and would close in early July 2013. It was anticipated that the first Play Streets would be held in early September, which would allow time for assessment of applications and the legal process for road closures. The final list of streets would be agreed with Ward Councillors.

Resolved -

- (1) That the progress of the Play Streets scheme be noted;
- (2) That, in consultation with the Chair of the Sub-Committee, the Lead Councillor for Strategic Environment, Planning and Transport and Ward Councillors, the Head of Legal and Democratic Services be authorised to make the appropriate (trial) traffic regulation orders to close roads in accordance with the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996;
- (3) That objections be reported back to the Sub-Committee at the appropriate time.

11. CAR PARKS TARIFF CHANGES 2013

The Director of Environment, Culture and Sport submitted a report advising the Sub-Committee of a proposal to change the "off street" car parking orders, following a review of the tariffs.

The report stated that the car park tariffs had last been reviewed in July 2012 with changes made to the short- and long-stay parking in all car parks. The tariffs reflected the different types of off-street car parking available, for example with the local centre shoppers' car parks charged differently to town centre car parking.

A full listing of the current and proposed car park charges was attached to the report at Appendix 1. There were no proposals to change the car park tariff rates at Broad Street Mall, Queens Road, Civic B Car Park, Kings Meadow, Chester Street, Caversham, Dunstall Close and Recreation Road. At Hills Meadow Car Park it was proposed to change the two-hour and all day rates to £2.00 (a 20p increase) and to £6.20 (a 20p increase) respectively. At Cattle Market Car Park it was proposed to change the all day rate to £5.00 (a 50p increase) and increase the HGV all day rate to £10.00 (a £2.50 increase), but with other tariffs left at the current rate. If the changes were agreed it was planned to introduce the revised charges from August 2013.

It was proposed at the meeting that a four-hour charging period be introduced at the Hills Meadow and Kings Meadow car parks, with the Chair authorised to decide the tariff in consultation with Ward Councillors.

Resolved -

- (1) That the changes to the car parking charging periods and tariffs set out in Appendix 1 be agreed;
- (2) That the Chair be authorised to decide the four-hour tariff at Hills Meadow and Kings Meadow car parks in consultation with ward councillors;

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- (3) That the Head of Legal and Democratic Services be authorised to advertise Notice of a Variation of Car Park Order of the Borough of Reading (Civil Enforcement Area) (Off Street Parking Places) Order 2012;
- (4) That the Tariff Changes be implemented using the delegated authority of the Head of Highways and Transport.

12. RESIDENTS' PARKING - UPDATE ON PERMIT SCHEME

The Director of Environment, Culture and Sport submitted a report updating the Sub-Committee on the Residents Parking Permit Management Rules and the Permit Management Rules Definitions, the current Scheme having been in place for two years.

The current Permit Management Rules were attached at Appendix 1 and the current Permit Management Rules definitions were attached at Appendix 2.

At the invitation of the Chair, Andrew Hornsby-Smith and Peter Seymour spoke on this item. The Sub-Committee noted the difficulties caused by the inclusion of motorcycles within the Residents Parking scheme, and agreed that the Permit Management Rules definitions should be amended so as to exempt motorcycles from the scheme.

Resolved -

- (1) That the updated Permit Management Rules as set out in Appendix 1 be noted;
- (2) That the Permit Management Rules Definition 12(c) be deleted;
- (3) That the Permit Management Rules Definitions, as set out in Appendix 2 and amended at (2) above, be endorsed.

13. 20MPH SPEED LIMITS/ZONES - UPDATE

Further to Minute 88 of the meeting of the Traffic Management Advisory Panel of 14 March 2013, the Director of Environment, Culture and Sport submitted a report providing an update on how the application of 20mph limits and zones could be achieved within the Borough.

Attached to the report at Appendix 1 were plans demonstrating how the lower speed limit could be applied in five areas of the Borough: Amersham Road Area, Merton Road Area, Oxford Road Area, St Giles Close Area and the University Area. The Sub-Committee made suggestions for potential extensions to the Amersham Road and University areas.

The report noted that consultation with residents would be required to ensure that there was local support for any introduction of a lower limit, and it was proposed that a consultation strategy be developed and submitted to a future meeting of the Sub-Committee, to form part of a wider policy/strategy for the use and implementation of 20mph limits/zones. Suggestions for other areas to be investigated could be received once a policy was in place.

It was also planned to extend speed survey work into areas where there were no existing traffic calming features, but where vehicle speed was low due to other factors such as narrow streets and on-street parking. This would provide a better profile as to how further 20mph speed limits/zones could be used or extended within the Borough.

At the invitation of the Chair, Councillor White spoke on this item.

Resolved -

- (1) That officers continue with the review of 20mph speed limits/zones and consult with the Lead Councillor for Strategic Environment, Planning and Transport and Ward Councillors on the potential 20mph areas shown in Appendix 1,
- (2) That officers investigate the suggestions made by the Sub-Committee for extending the Amersham Road and University areas;
- (3) That a consultation strategy be developed to ensure that local residents had the opportunity to express support or opposition to a lower limit;
- (4) That a report be submitted to a future meeting of the Sub-Committee with a consultation strategy and further recommendations as to where the 20mph speed restriction could be applied.

14. BUS SHELTERS OWNED BY READING BOROUGH COUNCIL - UPDATE

The Director of Environment, Culture and Sport submitted a report on progress with replacement of the bus shelters owned by Reading Borough Council with new bus shelters provided in accordance with the bus shelter contract, and seeking approval for a programme to replace or remove the remaining shelters as funding permitted.

The report stated that as at April 2013 the Council owned 46 shelter units, including 26 Clearchannel Insignia flat-roofed shelters, 10 Landmark shelters forming two bus ports in Minster Street and one individual Landmark shelter, six Queensbury Arun curved narrow roof shelters, two bespoke Trueform shelters at Kennet Island and one heritage ex-promenade shelter at The Travellers Rest in Caversham. There was a small budget for ad hoc repairs but no formal maintenance or cleaning contract for any of these shelters.

The report noted that many of the Clearchannel shelters were badly worn and had been vandalised, and the Council-owned shelters presented a poor appearance that did not reflect the policy to encourage the use of public transport, unlike the shelters provided under the JC Decaux (JCD) contract, which were well cleaned and maintained at no revenue cost to the Council. The JCD contract had the flexibility that, in addition to the free shelters which JCD had supplied, the Council could add further shelters paid for from capital funds which were then added into the maintenance and cleaning contract.

The report noted that Cabinet, at its meeting on 12 July 2010 (Minute 26 refers), had agreed a threshold minimum usage of 50 boarding passengers a day as being needed to justify continued investment in a bus shelter at that stop, subject to funds being available to do so. Following surveys of usage the Council-owned shelter-equipped stops had been categorised, with proposals for each category as follows:

Category A (17 stops, listed in the report)

A new shelter was justified as more than 50 people a day used the stop, and a standard JCD shelter could fit the location. It was proposed to purchase additional shelters as funds permitted and these would be added into the JCD contract;

Category B (10 stops, listed in the report)

TRAFFIC MANAGEMENT SUB-COMMITTEE MINUTES - 13 JUNE 2013

A new shelter was justified as more than 50 people a day used the stop, but a JCD shelter would not fit the location. It was proposed to replace Clearchannel shelters with Queensbury Arun shelters (or equivalent) and to retain any existing repairable specialist shelters and refurbish them as necessary. For all retained or purchased shelters it was proposed to instigate a new cleaning agreement with either Streetcare or JCD, and there would be a small budget for maintenance and repair;

Category C (3 stops, listed in the report)

Fewer than 50 people used the stop but due to other local factors there was justification for providing a shelter. JCD shelters would not fit these locations so it was proposed to treat them as Category B above;

Category D (9 stops, listed in the report)

A replacement shelter could not be justified as significantly fewer than 50 people a day used the stop, and the shelter was therefore surplus to requirements. It was proposed to remove shelters as soon as possible to avoid further vandalism and repairs; removed shelters could be relocated to another site or recycled to schools or other bodies;

Category E (3 stops, listed in the report)

A stop where, although a shelter was currently provided, it was proposed that no new shelter was installed for reasons listed, and proposed actions were listed individually.

The report stated that if these measures were undertaken the number of shelters owned by the Council would reduce from 46 to 13. A total of 17 sites had been identified for new JCD shelters, of which two would be paid for by the Dee Park developer. As a result of shelter removals up to 29 shelters suitable for recycling would be made available for schools and other bodies, to help encourage walking and cycling. The estimated capital costs associated with taking the proposed actions was £314,300.

Resolved -

- (1) That the progress made on the replacement of the old bus shelters to date and the fact that officers would continue to deliver this programme and report progress to the Sub-Committee, be noted;
- (2) That the proposals for the remainder of the programme be agreed;
- (3) That an outline timescale for the replacement programme be reported to the next Sub-Committee meeting, and as funding became available, further reports be submitted outlining specific elements of the programme for implementation.

15. HIGHWAY MAINTENANCE UPDATE

The Director of Environment, Culture and Sport submitted a report appended to which was a report submitted to Policy Committee at its meeting on 10 June 2013, informing the Committee of the Council's statutory duties in respect of highway maintenance and the procedures in place to repair defects, and outlining the current practice and expenditure on carriageway repairs. The report had also sought approval for an additional pothole repair plan.

TRAFFIC MANAGEMENT SUB-COMMITTEE MINUTES - 13 JUNE 2013

The Policy Committee had given approval to the pothole repair plan, which would deploy all available resources (six maintenance gangs) for a period of 12 months to carry out pothole repairs on a road-by-road basis, regardless of whether they met the current intervention of 50mm in depth over an area of about 300mm by 300mm. The plan would start with A, B and C class roads and then local distributor roads, bus routes, and premier cycle routes not on the A, B or C class network.

In order to carry out the repair plan the Highways Team would be increased from a six-gang operation to an eight-gang operation, whilst at the same time deferring a proportion of the income target in 2013/14, to be repaid in the following year through increased income generation. Once the repair plan was complete after a 12 month period, the additional gangs could concentrate on income-generating work, allowing the deferred income to be repaid, with the aim of being cost-neutral by the end of 2014/15.

Resolved -

- (1) That the highway maintenance update report to the Policy Committee meeting of 10 June 2013, and the Committee's decision to approve the additional pothole repair plan proposal be noted;
- (2) That officers continue to review the application of road markings on the carriageway as part of the current year's annual resurfacing programme and consult with the Lead Councillor for Strategic Environment, Planning and Transport and Ward Councillors prior to making any change.

16. VARIABLE MESSAGE SIGNS

The Director of Environment, Culture and Sport submitted a report updating the Sub-Committee on the introduction of the new Variable Message Sign (VMS) contract as part of the Local Sustainable Transport Fund (LSTF) projects. A Plan showing the proposed locations of four new VMS was attached at Appendix 1.

The report stated that VMS had been introduced in 2002 and added to in 2006-07 to provide travel information along certain key routes in Reading. They were used to inform drivers of car park status, congestion and events, and had been a valuable tool in enhancing network management such as by reassigning traffic to different routes during congested periods. As a part of the LSTF large bid a package of measures to enhance the ability to manage traffic throughout the greater Reading urban area was being progressed, and this included a review of existing VMS and the provision of additional signs to provide travel information at key decision-making locations. The review also included the replacement of 13 mechanical signs (such as the sign on Southampton Street, near the Red Lion Public House) which provided only car park information with new upgraded VMS. This would provide enhanced roadside travel information around and close to the IDR, which was currently lacking.

The report explained that alongside the replacement of existing VMS and Car Park signs, four new VMS locations had been identified to complement the existing signing strategy across the network. The proposed locations at Oxford Road (east of the Kentwood Hill roundabout), Forbury Road (eastbound), Forbury Road (westbound) and Peppard Road (near Queen Annes School) were shown in Appendix 1, and the Sub-Committee were asked to approve these, subject to consultation with the Lead Councillor for Strategic Environment, Planning and Transport and Ward Councillors.

TRAFFIC MANAGEMENT SUB-COMMITTEE MINUTES - 13 JUNE 2013

The report also listed proposed locations for a total of eight new VMS in the Wokingham and West Berkshire boroughs as part of the project. Following a competitive tendering exercise the VMS contract had been awarded to Swarco and the current programme indicated that installation would be undertaken through Summer/Autumn 2013.

Resolved -

That, subject to consultation with the Lead Councillor for Strategic Environment, Planning and Transport and Ward Councillors, approval be given to locate the new variable message signs (VMS) as listed above and shown in Appendix 1.

17. READING STATION

The Director of Environment, Culture and Sport submitted a report providing a progress update on the Reading Station Redevelopment Project and the associated highway works, and highlighting the key programme dates for future works associated with Reading Station.

Resolved -

That the progress of the Reading Station Redevelopment Project and the associated highway works be noted.

18. UNIVERSITY & HOSPITAL AND EASTERN AREA STUDY UPDATES

The Director of Environment, Culture and Sport submitted a report informing the Sub-Committee of requests from a number of residents of Eastern Avenue, in response to consultation undertaken as part of the University & Hospital Study in summer 2012, to reverse the changes made to existing Residents' Parking Schemes in 2011, specifically the re-organisation of the Residents' Parking Zone in Eastern Avenue.

The report noted that a review of all of the existing Residents' Parking Zones within the Borough had begun in 2009, and in September 2010 a consultation document had been delivered to all 12,000 households within the Residents' Parking Zones. The questionnaire results had been analysed and the resulting recommendations considered by Cabinet at its meeting on 29 November 2010 (Minute 98 refers). Changes which had been implemented included the reorganisation of existing Residents Parking Zones to match more closely the number of spaces available with the number of permits issued. This had taken effect from 1 April 2011 and included changes to the majority of Residents' Parking Zones in the Borough, including the zone in Eastern Avenue, which had been included in a wider zone that included some properties in Denmark Road, De Beauvoir Road, Carnarvon Road, Junction Road and Granby Gardens. The report recommended that the decision taken by Cabinet for the re-organisation of Resident's Parking Zones, including the zone in Eastern Avenue, be endorsed.

At the invitation of the Chair, Andy Pegg spoke on this item. A number of representations from residents had also been circulated to the Sub-Committee prior to the meeting.

The Chair noted the difficulties for residents following the changes to the Residents Parking Zone on 1 April 2011, and also outlined a number of concerns about the consultation prior to the change. He proposed that the separate Eastern Avenue Zone that had existed prior to the Residents Parking Scheme changes, therefore be reinstated.

Resolved -

- (1) That the report be noted;
- (2) That the separate Eastern Avenue Zone that had existed prior to the Residents Parking Scheme changes on 1 April 2011 be advertised for reinstatement;
- (3) That, in consultation with the Chair of the Sub-Committee, the Lead Councillor for Strategic Environment, Planning and Transport and Ward Councillors, the Head of Legal and Democratic Services be authorised to advertise and make the appropriate traffic regulation order to create an Eastern Avenue residents only permit parking zone in accordance with the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996;
- (4) That any objections be reported back to the Sub-Committee at the appropriate time.

19. LOCAL STRATEGIC TRANSPORT FUND UPDATE

The Director of Environment, Culture and Sport submitted a report updating the Sub-Committee on progress with delivery of the Local Sustainable Transport Fund (LSTF) Small Package for which £4.9m funding had been approved by the Department for Transport (DfT) in July 2011, and the LSTF Large Partnership Package, for which £20.692m additional funding had been approved by the DfT in June 2012.

The report comprised an update on each of the five delivery themes of the LSTF programme, with particular focus on projects that had reached milestones within the previous three months, and the Sub-Committee were in particular asked to note the following:

- The Bluetooth contract had been awarded to Colas;
- Five awards totalling £176,100 had been made under the Sustainable Travel Challenge Fund;
- An Invitation to Tender for a bicycle hire scheme had been sent to shortlisted bidders;
- A public exhibition had been held on a proposed pedestrian-cycle bridge across the Thames;
- Planning applications for MereOak and Winnersh Park and Rides had been submitted.

Resolved -

- (1) That the progress made on the LSTF projects to date be noted;
- (2) That a report on the consultation on a pedestrian-cycle bridge over the Thames be submitted to the next meeting of the Sub-Committee.

20. CYCLE FORUM MINUTES

The Director of Environment, Culture and Sport submitted a report informing the Sub-Committee of the discussions and actions arising from the 10 April 2013 meeting of the

Cycle Forum under the auspices of the approved Cycling Strategy. The Notes of the meeting were appended.

Resolved -

That the Notes of the meeting of the Cycle Forum of 10 April 2013 be noted.

21. EXCLUSION OF PRESS AND PUBLIC

Resolved -

That, pursuant to Section 100A of the Local Government Act 1972 (as amended) members of the press and public be excluded during consideration of Items 22 and 23 below, as it was likely that there would be disclosure of exempt information as defined in the relevant Paragraphs of Part 1 of Schedule 12A of that Act.

22. MINUTES OF DISCRETIONARY PARKING PERMITS APPEALS PANEL

The Minutes of the meeting of the former Discretionary Parking Permits Appeals Panel of 14 March 2013 were confirmed as a correct record and signed by the Chair.

23. APPLICATIONS FOR DISCRETIONARY PARKING PERMITS

The Director of Environment, Culture and Sport submitted a report giving details of the background to his decisions to refuse applications for Discretionary Parking Permits from a total of 15 applicants, who had subsequently appealed against these decisions.

Resolved -

- (1) That, with regards to applications 1.0, 1.1, 1.2, 1.6, 1.10, 1.11, 1.12 and 1.13, a discretionary residents permit be issued, on the understanding that the issue of the permit was personal to the applicant;
- (2) That, with regards to application 1.3, a discretionary residents permit be issued, on the understanding that the issue of the permit was personal to the applicant, and that when one of the two residents permits for the property was not renewed the applicant would take over the second permit;
- (3) That, with regards to applications 1.4, 1.5 and 1.14, a discretionary business permit be issued;
- (4) That, with regard to applications 1.8 and 1.9, a discretionary charity permit be issued;
- (5) That the Director of Environment, Culture and Sport's decision to refuse application 1.7 be upheld.

(The meeting started at 6.30pm and finished at 10.25pm).

Reading Climate Change Partnership Board Meeting
Wednesday 23rd January 2013
University of Reading



| | |
|-----------------------|-------------------------------------|
| Attendees: | |
| Sally Coble | Environment Agency (Chair) |
| Summreen Sheikh | RBC (minutes) |
| Ben Burfoot | Reading Borough Council |
| Tracey Rawling Church | Kyocera Document Solutions |
| Paul Gittings | Councillor, Reading Borough Council |
| Jenny Allen | Peter Brett Assoc. |
| Tom Yearley | University of Reading |
| John Booth | GREN |
| | |
| Apologies: | |
| Kim Wilkins | Primary Care Trust |
| Chris Rhodes | Transition Town Reading |

| | |
|----------|---|
| 1 | Minutes & Matters Arising |
| | No comments |
| 2 | Pioneer Places |
| | <p>RBC have won £280,000 from the Department of Energy and Climate Change to deliver an early Green Deal project which is intended to test the water for GD uptake. They will spend the money on employing 10 advisors to visit homes and carry out initial assessments that will lead to a Green Deal Assessment - 500 of which are free. They are writing to 28,000 properties who meet certain criteria, to give information on the scheme.</p> <p>In addition, possible target houses include Reading University students and landlords. Council stock is not on the list as measures should have been completed on these. HMOs (Houses in Multiple Occupation) are difficult to reach but will be contacted.</p> <p>In the GD scheme, there is an aspect that targets fuel poverty where people who take up the scheme are protected from energy price rises, which are only allowed to increase by 2% a year if a GD loan is taken up.</p> <p>It was recommended that a phone line be set up to deal with enquiries.</p> <p>Houses will be chosen by groups of people identified by the software 'Mosaic', which has profiles on local peoples social and property types. A marketing company will post out letters and manage the appointments that come through.</p> <p>RBC are employing someone to give presentations on Green Deal giving information only and not selling anything. Tracey suggested advertising through Reading Football Club and businesses. Jenny suggested linking it into Climate Week events.</p> |

| | |
|----------|---|
| | <p>Sessions presenting to community groups were also being arranged along side a series of 'super home' visits where people get the opportunity to see the energy efficiency work a homeowner has done to their home first hand and hear about how beneficial it has been.</p> <p>The EA, PBA, Kyocera and the University are possible avenues of advertising for this scheme.</p> |
| 3 | Social Enterprise |
| | <p>A report has been completed which includes a detailed business case. It is based on a 25 year commitment and they are discussing a shorter term investment. Discuss at next meeting.</p> |
| 4 | Circular Economy |
| | <p>The transformation model highlighted in the Circular Economy is not considered in Climate Change Strategy. In summary, the model demonstrates the recycling of waste into raw materials and its return to the economy.</p> <p>ACTION: Include this concept in the strategy.</p> <p>Tracy is taking this forward with the Berkshire LEP (Local Enterprise Partnership). It will be appealing to businesses at a Berkshire wide level. Eila McCartha came up with this idea. (These goods made from renewables).</p> <p>TRC has circulated a chapter on this. It is to be put in as an introduction and referred back to in the Purchasing & Waste chapter.</p> <p>A mapping exercise between the chapters to pull out cross references is needed.</p> <p>ACTION: Consider how put actions against it: local actions in next 3 years ie providing a way to collect and distribute waste.</p> |
| 5 | Process of approval - from RCCP |
| | <p>Tom raised a query around the discontinuation of two projects in the past which had not received quick approval from the Board. The frequency of meetings made this more difficult. Sally clarified that she as chair makes decisions for the partnership. Sally is able to respond between meetings if needed.</p> <p>Board members can not approve spending of funding. The RCCP doesn't hold funds and is not constituted. Under the LSPs guidelines and approval the RCCP have £100K to spend which remains from the LAA Reward grant after funds were spent on solar panels.</p> <p>A relatively quick approval process to connect to the RCCP and use its brand is needed as meeting agenda's get very full.</p> |
| 6 | Climate Change Strategy |

The consultation is open until 31st January as some key stakeholders need to be engaged further.

Target

Discussed having a target of 50% as its more ambitious but it may be off putting. In addition, the definition of 'Zero Carbon' keeps changing so it is unhelpful to use that term - 'Low Carbon Lifestyles' is considered more appropriate.

Decided on a 6-7% annual reductions which totals 34% in 7 years.

Things to consider

Have an approach where all activities are considered.

Absolute or relative reduction.

Want businesses to give us data using communities of practice.

How to monitor/report this?

Business/individuals involvement.

To note

RBC achieved 7.5% reduction when it took part in 10:10 - targets shouldn't be taken too seriously, reduction in general is good and should be sought.

Strategic Priorities and targets are different.

'Annual awards' can be used to get an annual response and can be used as a way of engaging people.

Structure

Proposals to combine chapters: Built Environment and Communications and Water and Natural. Adaptation to be dispersed and be included in all the chapters.

ACTION: Ben & Jill will look at this restructure.

Action plans

There will be a mid term / three yearly review of action plans - they are the baseline for new developments.

In general, Jill highlighted that more time is needed to complete the writing and editing of the strategy. Discussed having RBC sign up to the strategy at a special full council meeting in July. Possibly a public launch in June, or a combined launch with the council meeting.

7 **AOB**

Sub groups - these are to be set up as necessary to meet the aims of the climate change strategy action plan.

Remove mention of Behaviour Change Group from the strategy.

JOINT WASTE DISPOSAL BOARD
14 MARCH 2013
(10.20 am - 12.00 pm)

Present: Bracknell Forest Borough Council
Councillor Mrs Dorothy Hayes MBE

Reading Borough Council
Councillor Mrs Jan Gavin
Councillor Paul Gittings

Wokingham District Council
Councillor Angus Ross
Councillor Rob Stanton

Officers Claire Ayling, Reading Borough Council
Pete Baveystock, Wokingham Boprough Council
Oliver Burt, Reading Borough Council
Janet Dowlman, Bracknell Forest Council
Dave Fisher, Reading Borough Council
Steve Loudoun, Bracknell Forest Council
Mark Moon, Wokingham Borough Council

Apologies for absence were received from:

Councillor McCracken, Bracknell Forest Council
Kevin Holyer, Reading Borough Council

20. Declarations of Interest

There were no declarations of interest.

21. Minutes of the Meeting of the Joint Waste Disposal Board

Minute 19: Mediation of Recyclate Income

It was reported that following the Management Board meeting on 13 December 2012 additional information pertaining to the sharing of income arising from the sale of recyclable materials had been brought to the Board's attention. Information that negated Recommendation 1 agreed at the meeting held on 13 December 2012. It was therefore agreed that Minute 19, Recommendation 1 would not be actioned.

RESOLVED that, apart from Minute 19, Recommendation 1, the minutes of the meeting of the Joint Waste Disposal Board held on 13 December 2012 be approved and signed as a correct record.

22. Urgent Items of Business

There were no urgent items of business.

23. Green Machine Enterprise CIC

The Green Machine's Mark Sanders and Dawn Cannon gave the Board an update on the performance of Green Machine, the Community Repaint Scheme, and the work that was taking place to boost the scheme's sales.

The number of collections had been increased at both Longshot Lane and Smallmead and the percentage of collections had now exceeded the target set for Longshot Lane. Paint sales were increasing month on month with a significant number of customers learning about the scheme through Bracknell Forest Homes. Links had been developed with Reading Voluntary Action and Bracknell Forest Voluntary Action. Leaflets had also been distributed to schools in the RE3 area. Work to identify a full time manager was underway.

The Board felt that the Scheme suffered from a perception problem amongst the public with many people assuming that the paint was only available to voluntary and community groups and that the paint that was available was partially used and only available in a limited range of colours.

It was acknowledged that whilst it was hoped that community and voluntary groups would make the majority of purchases from the scheme, individuals wishing to buy paint for home decorating projects would be welcomed. In addition the paint available was unused and a wide range of colours were available to purchase. It was agreed that refocusing the marketing information so that greater emphasis was placed on the ethical buying side of the Scheme.

It was agreed that Board members would pass any appropriate contact details through to Dawn Cannon to enable new marketing avenues to be explored.

The Board was informed that the Green Machine were currently in the first quarter of year two of a two year contract and it was agreed that a report focusing on the financial aspects of the contract would be brought to the Board's next meeting.

24. Joint Waste Disposal Board Progress Report

The Board received a report providing an update on progress made since its last meeting on 13 December 2012. The report included updates on financial matters, an outline of proposals for the future of the retail outlet, the possible development of a bike recycling scheme and performance monitoring information.

It was reported that the agreement with Sue Ryder which enabled unwanted items to be retrieved from the re3 recycling centres and resold via Sue Ryder's charity shops had now reached the end of the agreed two year term of the contract. It was noted that over the length of the agreement the arrangement had worked well and approximately £50,000 had been generated for the charity. The following three potential options for the future direction of the service were discussed by the Board:

- Continue the contract with Sue Ryder on the same terms
- Continue the contract with Sue Ryder but renegotiate the terms so that the re3 authorities enjoy a share of any profits
- Allow the contractor to sell goods through retail outlets in Buckinghamshire with the re3 authorities enjoying a share of any profits

The Board felt that whilst £50,000 appeared to be a significant amount of money the return relative to the benefits far outweighed the cash value once split between the re3 authorities and the amount each authority received would be minimal. It was agreed that Sue Ryder would be approached to continue with the contract. It was requested that Sue Ryder be asked to provide an update on the project at the Board's next meeting.

The Board discussed the national Sustrans and 'Bike-it' projects to promote cycling and a proposal to extend and develop the scheme into the re3 authority areas. It was

proposed that unwanted bikes would be retrieved from the household waste recycling centres, repaired and made roadworthy by local bike shops and then sold to residents at a significantly reduced price. The Board acknowledged the potential benefits of the scheme and agreed that the project should be progressed asked officers to prepare a report on the practicalities for the Board's next meeting.

It was felt that work needed to be done to make people aware of how goods were recycled through the Sue Ryder Charity Scheme. It was agreed that a suggestion to have a specific well signed area set aside for people to leave bikes and other unwanted good for these recycling initiatives at the Household Waste Recycling Centres would be followed up by officers and fed back as part of the report to the next meeting.

RESOLVED that:

- i The contract to retrieve and sell on unwanted goods with Sue Ryder be renewed for another two years under the same terms and conditions
- ii Officers to discuss with WRG how best to advertise/promote the Sue Ryder recycling initiative at both the Longshot Lane and Smallmead Household Waste Recycling Centres
- iii Officers to talk with WRG and Sue Ryder to ascertain how collections might be made more overt
- iv Progress reports on how to develop the Sue Ryder Recycling Initiative and the Sustrans 'Bike-it' Cycling Initiative be brought to the next meeting

25. Exclusion of Public and Press

That pursuant to Regulation 21 of the Local Authorities (Executive Arrangements) (Access to Information) Regulations 2000 and having regard to the public interest, members of the public and press be excluded from the meeting for the consideration of items 8 and 9 which involve the likely disclosure of exempt information under the following category of Schedule 12A of the Local Government Act 1972:

- (3) Information relating to the financial or business affairs of any particular person.

26. Revenue Sharing from the Sale of Recyclable Materials

The Board considered a report providing an update on the latest position with regard to the ongoing dispute between the re3 Councils and WRG over the distribution of income from the sale of recyclable materials and how his related to the excess profit clause.

The report included an update on progress made since the Management Board meeting on 13 December 2012, an update on the current position, a summary of outcomes arising from modelling exercises conducted by Ernst and Young and a summary of legal advice pertaining to the matter.

The Board expressed dissatisfaction with the current position.

RESOLVED that:

- i The Management Board note the progress made since their last meeting on 13 December 2012
- ii Officers formalise the dispute with the Contractor on the issue of Excess Profit as described in paragraph 3.40 of the Project Director's report
- iii Of the two options (A and B), set out in paragraph 3.39 of the Project Director's report, proposed by Eversheds as representing possible ways forward Option A be endorsed as the Board's preferred choice
- iv Members endorse an approach by officers to the PFI Project Sponsors at DEFRA, as described in paragraph 3.30 of the Project Director's report, with a view to seeking appropriate assistance in concluding the disagreement

27. Joint Waste Disposal Board Contract Review

It was agreed that due to time constraints this item would be deferred until the Board's next meeting.

CHAIRMAN

READING BOROUGH COUNCIL

REPORT BY DIRECTORATE OF CORPORATE RESOURCES

| | | | |
|------------|---|--------------|---|
| TO: | STRATEGIC PLANNING, ENVIRONMENT AND TRANSPORT COMMITTEE | | |
| DATE: | 9 th July 2013 | AGENDA ITEM: | 8 |
| TITLE: | DRAFT READING CLIMATE CHANGE STRATEGY 2013-2020 'READING MEANS BUSINESS ON CLIMATE CHANGE' | | |
| SERVICE: | CORPORATE POLICY/ SUSTAINABILITY | WARDS: | ALL |
| AUTHOR: | Jill Marston/ Ben Burfoot | TEL: | 72699/ 72232 |
| JOB TITLE: | Senior Policy Officer/ Sustainability Manager | E-MAIL: | jill.marston@reading.gov.uk ben.burfoot@reading.gov.uk |

1.0 EXECUTIVE SUMMARY

- 1.1 The Reading Climate Change Partnership was convened in 2009 as part of the delivery of the 2008 Reading Climate Change Strategy, Stepping Forward for Climate Change.
- 1.2 The strategy action plan ran from 2008-2013 and focused on Reading Borough Council services. The Council aimed to lead by example and work in partnership to reduce borough emissions.
- 1.3 The Council reported emissions reductions in all years except for 2009. The emissions from the borough as a whole up to 2010 reduced by 18% reduction.
- 1.4 Other achievements included thousands of houses insulated (with a particular focus on those in fuel poverty), hundreds of people trained in green skills, with many subsequently employed, solar panels on a large number of schools and other public buildings and lower carbon development.
- 1.5 The Reading Climate Change Partnership has been overseeing the development of a new climate change strategy for Reading (Reading Means Business on Climate Change), to be launched in Sept 2013.
- 1.6 Following public consultation in November and December 2012, the draft of the strategy has been revised and is currently in the process of final edit. The current draft is attached as Appendix A.

- 1.7 Strategy 'theme leads' are currently consulting with partners on the content of action plans to deliver the strategic priorities identified for each theme, to be published alongside the strategy in September. A list of the strategic priorities is attached as Appendix B.

2.0 RECOMMENDED ACTION

- 2.1 The committee comment on the draft Reading Climate Change Strategy 2013-20, 'Reading Means Business on Climate Change' (Appendix A).
- 2.2 The committee delegate authority to the Head of Policy, Performance and Community to make minor changes to the draft prior to the final strategy being submitted to Policy Committee on 23rd Sept for agreement.

3.0 Background

- 3.1 In 2008 Reading Borough Council published its Climate Change Strategy and action plan to 2013, "Stepping forward for Climate Change". The majority of the programmes set out in the action plan have been successfully delivered. The action plan focused primarily on Council functions.
- 3.2 The Climate Change Act 2008 establishes national carbon budgets of 50% reduction in carbon emissions by 2027, below 1990 levels. The government is bound to make provisions to meet this through a range of regulations.
- 3.3 Stepping Forward for Climate Change did not set emission targets for the borough as a whole, but rather set a policy framework to enable cross sector emission reductions to be made to increase the chances of the Borough meeting a 34% reduction by 2020. This was in line with national and European policy. There are no local data sets for carbon dioxide emissions in 1990.
- 3.4 The graph shown on page 7 of Reading Means Business on Climate Change, 'Reading CO₂ emissions' shows the reductions that have been made in the different sectors. The emissions in Reading have reduced significantly during the period 2005 to 2010 with a total reduction in annual emissions of 18% over this period. Reading's population has risen during this same period and the per capita reduction in emissions was 22%.

- 3.5 The carbon emission reduction targets set out for the Councils own operations in "Stepping Forward for Climate Change" were: 20% reduction in emissions by the end of the strategy period (by 2013), 50% by 2020 and zero carbon by 2050.
- 3.6 The carbon dioxide emissions from the councils own operations were first measured fully in 2007. These were measured as 30,470 tonnes and whilst the most recent measurement of 22,710 tonnes, compares very favourably with this with reductions achieved every year except 2009, the measurement methods have changed and so the figures cannot easily be compared. The carbon dioxide emissions data for the fifth year of the strategy (2012/13) are currently being processed and will be available in August 2013.
- 3.7 A summary of the achievements made through Stepping Forward for Climate Change is provided in the new draft strategy, Reading Means Business on Climate Change.
- 3.8 Some of the accomplishments during the first strategy were:
- Thousands of homes were insulated.
 - Hundreds of people trained in 'green skills'.
 - Solar panels were installed on many of the boroughs schools and corporate buildings such as the bus depot and Rivermead leisure centre.
 - Development sites have been earmarked for energy schemes.
 - There was an increase in sustainable transport choices.
 - The Council made good progress with its own emissions.

4.0 Development of Reading Means Business on Climate Change

- 4.1 The new climate change strategy for Reading covering the period 2013-2020 has been developed through extensive stakeholder consultation, including a conference with over hundred stakeholders in January 2012, a second well attended stakeholder consultation workshop in July 2012, and consultation via the Reading Green Business Network (RGBN) website.
- 4.2 A draft of the strategy was published for public consultation in November and December 2012, and focused on the proposed strategic priorities for each theme. Changes to the strategy have now been made in the light of the consultation responses.
- 4.3 A number of themes have been identified, and 'theme leads' from a range of partner agencies (including RBC) volunteered to co-ordinate and develop each theme chapter, in consultation with stakeholders. The 'theme leads' include: Reading Borough Council councillors, sustainability, planning, transport and communications teams;

Kyocera Document Solutions, NHS Berkshire, Greater Reading Environmental Network, Institute for Sustainability and Reading Friends of the Earth.

4.4 The themes are:

- Energy
- Low Carbon Development
- Natural Environment
- Water Supply and Flooding
- Transport
- Purchasing, Supply and Consumption
- Education, Communication and Influencing Behaviour
- Community

4.5 For each of the eight themes, a number of strategic priorities have been identified (see Appendix B). These form the framework for detailed action plans for each theme of the strategy.

4.6 The action plans, setting out how the strategic priorities will be achieved, are currently being developed by the 'theme leads' in consultation with delivery partners.

4.7 A key target audience for the strategy is Reading's business community. However, rather than creating a separate 'business' theme, the business viewpoint is reflected via a 'business box' within each of the theme chapters.

4.7 The strategy is still in the final edit stage and there may be further minor amendments to the draft version attached at Appendix A. The Committee is invited to comment on the draft.

5.0 Vision and target

5.1 The draft strategy sets out a vision for Reading for 2020, with low carbon being the normal way to live and work in 2050. It proposes a target for the **borough as a whole** to reduce emissions by **34% by 2020** (against a 2005 baseline), with members of **Reading Climate Action** (see 5.2 below) committing to reduce their emissions by **7% a year**.

5.2 The strategy proposes a wider network of organisations, businesses, communities and individuals called Reading Climate Change Network, who will seek to establish ways to meet the targets and aspirations of the strategy. To help promote the community of action, we are also developing an awards scheme to reward those who achieve the target.

6.0 Action plans

6.1 The strategic priorities form the framework for the action plans for each theme of the strategy, which set out how key partners will contribute towards the strategy's overall target, along with targets, measures and milestones.

6.2 These are currently still in development by theme leads and will be published with the strategy in Sept 2013. The action plans will constitute a three year rolling programme, reviewed annually.

6.3 Although the intention is for a range of organisations, including the Reading Climate Change Partnership, to commit to actions, a significant element of the action plans is likely to be delivered by the Council. Much of the Council's delivery within the strategy will be embodied in existing Council policies such as the Local Transport Plan and Biodiversity Action Plan. A number of developing strategies will also be relevant such as the Asset Management Strategy and the associated Energy and Carbon Management Policy.

6.4 Both the Council's element of the action plans, and the final strategy itself will be signed off by the Policy Committee in Sept 2013, to allow publication in September.

7.0 Publication and launch

7.1 The strategy will be published via a dedicated interactive website which will inspire both organisations and individuals to join Reading Climate Action.

7.2 In addition to the full strategy, there will also be a summary version of the strategy aimed at the general public.

7.3 Both the strategy and the website will be launched at a breakfast event planned for Sept 2013. Businesses will be a key target audience, along with other key stakeholders.

8.0 Timetable

8.1 The outline timeline for the remaining development of the strategy is as follows:

| | |
|---|-----------------------|
| Final editing and compilation | June 2013 |
| Development of final action plans with partners | Summer |
| Development of website and summary | Summer |
| Final to Reading Climate Change Partnership | Sept |
| Final to Policy Committee | 23 rd Sept |
| Publish/launch | 24 th Sept |

9.0 CONTRIBUTION TO STRATEGIC AIMS

- *To Develop Reading as a Green City with a sustainable environment and economy at the heart of the Thames Valley*

9.1 The Council has made a commitment to lead in tackling climate change in Reading. The success of the delivery the Climate Change Strategy is paramount in meeting this strategic aim.

- *To establish Reading as a learning City and a stimulating and rewarding place to live and visit.*

9.2 Reading needs to develop a low carbon economy. Jobs and learning opportunities created in the delivery of the strategy are a key part of this. Climate change is a key part of 'sustainable schools' and development of the curriculum to include of climate change is vital in securing the future of Reading.

- *To promote equality, social inclusion and a safe and healthy environment for all*

9.3 The health and welfare of the population of Reading depends in part on understanding and adapting to the impacts of climate change.

10.0 COMMUNITY ENGAGEMENT AND INFORMATION

10.1 Extensive stakeholder engagement, including two very well attended workshops, has influenced the development of Reading Means Business on Climate Change from the outset.

10.2 A draft of the strategy was published for public consultation at the on 1st Nov, running for six weeks until December 14th. Responses have now been considered and the strategy revised.

11.0 EQUALITY IMPACT ASSESSMENT

11.1 The implementation of Reading Means Business on Climate Change and associated carbon reductions will benefit Reading's population as whole in helping to mitigate the effects of climate change, as well as benefiting some sections of the population more specifically e.g. the education and skill level of those living and working in Reading will need to be raised in order to meet the demands of an expanding 'green economy'; this will enable people generally to play a fuller part in a more cohesive society.

11.2 Grant assistance will be provided through the Green Deal, to enable those in fuel poverty who find it difficult to heat their homes to be

able to afford work such as loft and cavity wall insulation so that their homes produce fewer emissions as well as being warmer.

12.0 LEGAL IMPLICATIONS

12.1 The Climate Change Act 2008 implements a range of regulations which local authorities are required to meet, in relation to its own operations.

12.2 The Climate Change Strategy is a key policy under the Local Strategic Partnership, its delivery forming part of the delivery of the Sustainable Community Strategy.

13.0 FINANCIAL IMPLICATIONS

13.1 The strategic priorities that are primarily delivered by the council have been identified as deliverable within the existing budget framework of the Council.

13.2 Under the revised constitutional arrangements the responsibility for climate change policy is now held by the Strategic Environment, Planning and Transport Committee. Since the action plans will be reviewed annually, it is proposed that this committee approve any changes to the action plan to ensure that delivery is consistent with the Council's policy and budget frameworks. Should amendments to the action plans require additional resourcing, beyond the existing budget framework then the revisions will need to be approved by full Council.

13.3 The financial implications of the delivery of the Council's actions in relation to energy management form a key element of the financial savings programme of the Council. The strategy includes investment plans for the period 2013-16. These are included within the Council's budget.

14.0 BACKGROUND PAPERS

14.1 Appendix A - Stepping Forward for Climate Change 2008-13 -Strategy.

14.2 Appendix B - List of Strategic Priorities.

Draft 270613

READING MEANS BUSINESS ON CLIMATE CHANGE

READING'S CLIMATE CHANGE STRATEGY 2013-202

DRAFT 270613

FOR STRATEGIC PLANNING, ENVIRONMENT AND TRANSPORT COMMITTEE 090713

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INTRODUCTION

There is overwhelming global consensus that society must rise to the challenge of tackling climate change.

“The Intergovernmental Panel on Climate Change tells us, unequivocally, that greenhouse gas emissions must be reduced by half by 2050 - if we are to keep the rise in global temperatures to 2 degrees since pre-industrial times”.

(U.N. Secretary Ban Ki-moon, 17th Conference of the Parties, Durban 2011).

In times of economic uncertainty and with the planet facing unprecedented pressures on natural resources, energy reserves and land-use, we must face our responsibilities and play our part in averting the risks of severe climate change. This is crucial to ensuring a sustainable future.

We must act locally in the global interest, but we should also not overlook the significant local benefits of this action. These benefits include improving the efficiency and resilience of our local communities and infrastructure. We must reduce the risks that climate change will present and maximise the opportunities that lie in innovating and developing solutions.

“Most of the observed increase in global average temperature since the mid-20th century is very likely due to the observed increase in anthropogenic (man made) greenhouse gas concentrations.” (The International Panel on Climate Change - fourth assessment report).

Reading Means Business on Climate Change is Reading’s first cross-sector climate change strategy, developed by the Reading Climate Change Partnership (RCCP). As well as providing a vision for Reading and a strategic framework for action, Reading Means Business on Climate Change aims to motivate and encourage others into action and commitment by promoting the very positive progress which has already been made in the first climate change strategy, Stepping Forward for Climate Change.

READING CLIMATE CHANGE PARTNERSHIP

The Reading Climate Change Partnership (RCCP) was set up in 2009 with the mission to work in partnership across all sectors, including the business, public, and community and voluntary sectors, to deliver urgent and appropriate action to mitigate and adapt to climate change in Reading.

The RCCP reports to the overarching Reading partnership, the 'Local Strategic Partnership' - called Reading 2020. This partnership which brings together organisations, groups and individuals from all sectors to work in partnership for the benefit of all our residents, visitors and workers.

The development of RCCP was one of the key actions set out in the Council's 2008 - 2013 Climate Change Strategy for Reading, called Stepping Forward for Climate Change, which focused primarily on actions that the Council would take to address climate change.

READING MEANS BUSINESS ON CLIMATE CHANGE 2013-2020

'Reading Means Business on Climate Change' presents a vision for how Reading will tackle climate change between 2013 and 2020.

The strategy establishes a set of strategic priorities for achieving this vision, for each of eight themes, along with a three year rolling action plan.

Our vision:

We will develop a thriving network of businesses, organisations and individuals who will work together to develop solutions to reduce carbon emissions and prepare for a changing climate.

Running through each of the themes are the two broad objectives that the strategy seeks to address:

1. **Develop a low carbon Reading**

We need to reduce the emissions of climate affecting pollution, known as green house gases, predominantly the carbon dioxide emissions emitted when burning fossil fuels.

Low carbon living and working will be normal practice in 2050.

We will work to reduce emissions in the borough by 34% by 2020 against a 2005 baseline¹².

¹ 34% is the current target for the UK against a 1990 baseline. National emission reductions between 1990 and 2005 were 15% source: Table 5 of DECC statistical release 2012 UK Greenhouse Gas Emissions Provisional Figures.

Members of the community of action will commit to reduce their green house gas emissions, aiming to make 7% annual reductions³.

2. Prepare for a changing climate

We need to be prepared for the inevitable effects of climate change that are already in the system due to the higher concentration of green house gases from activities past and present.

We will identify the key risks to Reading from the predicted impacts of a changing climate and establish ways to protect against these risks. People will consider their own vulnerability to the effects of climate change and prepare to minimise the risks.

The themes for the strategy have been developed through engagement with key stakeholders as a means of structuring the strategy. However, several of the themes are cross-cutting and run throughout the strategy, particularly 'Education, Communication and Influencing Behaviour' and 'Community', though there are cross-references within all theme chapters.

Reading's Climate Change Network

The Partnership's central vision is one of participation. Thriving in the future involves doing positive things that will make a local and global contribution.

The Reading Means Business on Climate Change website will enable organisations, groups and individuals to sign up to the strategy and commit to act to help meet its objectives and targets, and will present information on potential actions.

To join the network, please visit website or contact the Council⁴ to be sent a paper version of the commitment.

RCCP will also host an annual event that will offer participants of the network the opportunity to celebrate contributions to this future vision.

Climate friendly business - a circular economy

A significant proportion (48.5%) of green-house gas emissions are attributable to the business sector and therefore commercial organisations, both large and small, are a

² Borough emissions will be measured using the National Inventory of Greenhouse Gases - (Carbon Dioxide Emissions with the Influence of Local Authorities) published by DECC, annually.

³ For organisations, measurement of their carbon footprint should be made using the greenhouse gas protocol or similar standard and reductions measured against a baseline.

⁴ Contact details to be added

key focus of this strategy. We hope to engage a range of businesses in the delivery of the strategy through the development of Reading's Climate Change Network.

Business is also the engine of innovation and can provide the solutions that we need to reduce carbon emissions and protect us from the impacts of climate change. The 'circular economy' is at the heart of our strategy. This concept shows a positive vision for the future economy, where clean energy is used to power production, re-using products and materials, and where possible using natural materials that can safely be returned to nature. The economy then becomes circular with little impact on the environment (*see the chapter on Purchasing, Supply and Consumption' for more on the 'circular economy'*).

How will the Strategy be delivered?

The strategic priorities within the strategy will be delivered through a rolling 3 year action plan, which will be revised annually with an annual progress report. The action plan will be delivered by both RCCP and the wider network.

The strategy will be reviewed in 2016/17.

Consultation on the draft strategy

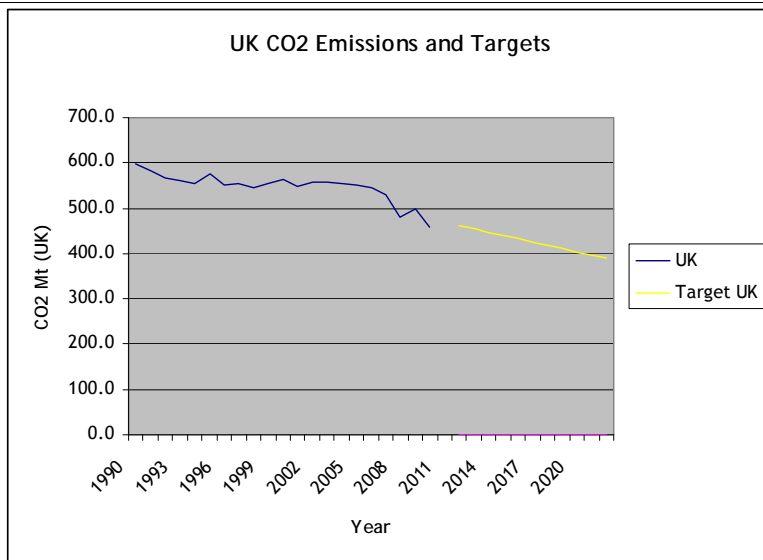
RCCP has consulted extensively on the climate change strategy, developing the content through a series of events, with individual chapters authored by different partnership members. A draft strategy of 'Reading Means Business on Climate Change' was published for general consultation for a period of six weeks, closing in December 2012. The strategy and action plans were then revised in the light of the consultation results and edited to produce the final document.

SETTING THE SCENE - REDUCING GREEN-HOUSE GAS EMISSIONS

UK

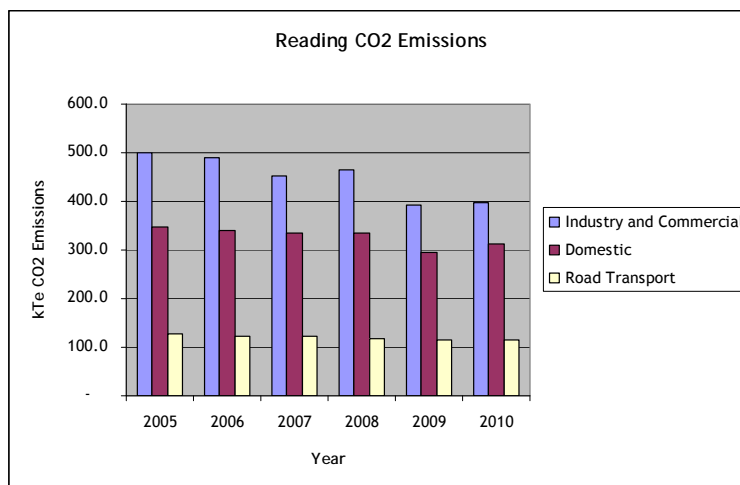
For the UK, the Climate Change Act 2008 establishes a long-term framework for tackling climate change. The act aims to encourage the transition to a low-carbon economy in the UK through setting national targets. This means a reduction of at least 34% in greenhouse gas emissions by 2020 and at least 80% by 2050, against 1990 baseline.

The graph below shows the reduction in carbon dioxide emissions since 1990 and the targets to 2050.



Reading's Green-house Gas Emissions

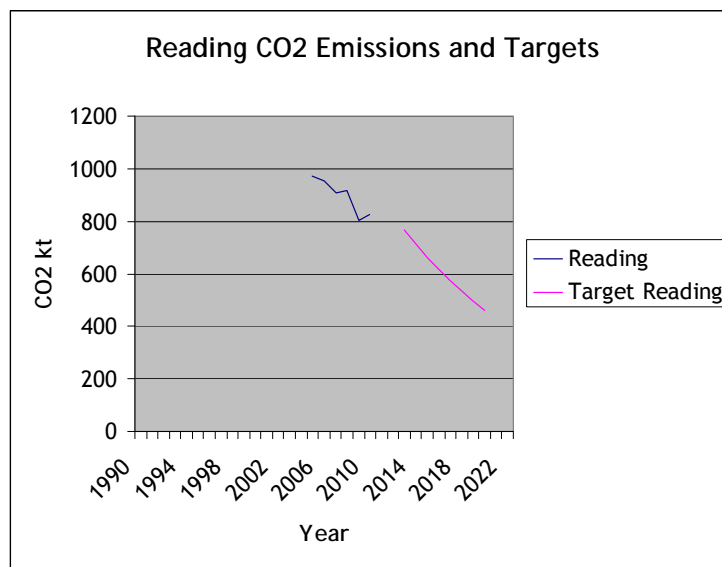
Reading is a busy commercial town, with a significant proportion of its green-house gas emissions (48.5%) attributable to its commercial activities.



Total emissions in Reading reduced by 15.5% between 2005 and 2010 and by 22% in terms of per capita emissions (in the context of a rising population over the last 4 years).

Reading has in fact reduced its emissions by a greater percentage since 2005 than the UK as a whole.

Through the delivery of 'Reading Means Business on Climate Change', RCCP aims to reduce Reading's emissions by 34% between 2005 and 2020, against a 2005 baseline, as there is no reliable data for emissions in 1990.



RECENT ACHIEVEMENTS AND SUCCESSES

The Council's first climate change strategy, *Stepping Forward for Climate Change* (2008-12), was written in consultation with the community and set out targets for the Council to reduce its own CO2 emissions by 50% by 2020, becoming zero carbon by 2050. It also set out the initial steps towards the wider borough reaching a 80% reduction in emissions by 2050.

Some of the accomplishments during the first strategy:

- Thousands of homes were insulated.
- Hundreds of people were trained in 'green skills'.
- Solar panels were installed on many of the boroughs schools and corporate buildings such as the bus depot and Rivermead leisure centre.
- Development sites have been earmarked for energy schemes.
- There was an increase in sustainable transport choices.
- The Council made good progress with its own emissions.

However, reductions delivered under *Stepping Forward for Climate Change* were a small proportion of the total progress made by organisations and individuals in the borough during that time.

Some examples of projects that have been delivered in *Stepping Forward for Climate Change*:

- The Council has made good progress, reducing its own emissions between 2008 and 2012. This includes continued investment in energy efficiency equipment across its own building stock through the SALIX ‘invest to save’ programme from 2008 to 2012.
- Almost 2000 insulation measures have been installed in Reading’s private housing. This represents around half of the funded insulation jobs carried out in the borough in the period 2008-12.
- The Greener Warmer Safer programme and Winter Watch schemes target homes where the householders are at risk of under heating their homes. Insulation and a range of other measures are offered as part of the package.
- A wood fuelled heating network has been installed at one Council site and one development area incorporates an energy centre for energy in its plans. Further feasibility reports have been conducted pending suitable development plans and/or funding.
- A 24% reduction in car trips to the centre of Reading has been made since 2006 and an 11% increase in pedestrian journeys.
- The Council and the Reading Climate Change Partnership installed over 2000 solar panels on 40 buildings including 17 schools, aiming to lead ‘a step change in renewable energy’. This tripled the amount of solar electricity generation in the borough.
- Around 300 people signed up to the ‘Stepping Forward for Climate Change’ pledge to reduce their carbon footprint by an average of 1 tonne per annum per household.
- The Climate Change Partnership has begun to develop approaches to bring in investment for renewable energy and energy efficiency in the borough.
- The Council has adopted planning policies for local energy provision (including renewable energy) and for adaptation to climate change. Further work is being carried out to identify how new homes can be zero carbon by 2016.
- A local climate impacts profile was conducted to assess the effects of local weather events in the borough, in particular heat events and rainfall. .
- Kyocera Document Solutions has supported a programme of daily tips on sustainable living, plus events and on-air discussions on local radio station Reading 107, over the period 2008-2011.
- The Climate Change Partnership has been modelling approaches to the Green

Deal for the borough, with a view to tackling fuel poverty, reducing carbon emissions and creating jobs.

- A training package (Eco-Advantage) enhancing 'green skills' was delivered to over 180 unemployed learners in Reading.
- A solar project for Reading installed solar panels that generate electricity onto 40 buildings including schools, council buildings, community building and local businesses. The project included a council investment, a community scheme and local community funded schools on the 10:10 solar schools scheme.

ENERGY

INTRODUCTION

Modern society relies on the provision of energy to our homes and workplaces; life in the UK climate would simply not function without it. Most of us assume that energy is freely available. We turn on any appliance (kettle, cooker, computer, for example) when it suits us and for as long as we like. This energy of course has to be generated, normally in a power station using mainly fossil fuels (such as coal, oil and gas). Combustion of these fuels releases green house gases into the atmosphere.

The heavy dependence on fossil fuel to provide this energy in the UK has been identified as our most significant impact on global climate change. It is therefore crucial that we consider how our energy is produced, supplied and consumed and what we can do to be more efficient and limit our impact on climate change, whilst balancing the needs of the society.

By being efficient with the energy we use, 'greening' the grid and developing new, clean and efficient methods of generation and distribution, we can reduce the impact of our energy consumption on global climate change

This chapter sets out Reading's plan to reduce its emissions from energy.

VISION BY 2020

In 2020, Reading will use less energy and have cleaner, greener supplies of electricity and heat. We will have made a step change in the provision of locally generated renewable energy which will have increased to at least 8%.

Local smart grids and power plants (decentralised energy) will offer more responsive, cost effective, low carbon energy to consumers.

Smart meters will be installed across the borough to improve monitoring and control of local energy supply. Communities and businesses will work together to reduce their energy consumption and develop low carbon energy solutions.

SUMMARY OF STRATEGIC PRIORITIES

- *Reduce electricity consumption within the commercial and public sectors*
- *Introduce smart meters and energy storage solutions in Reading*
- *Increase amount of energy generated locally using renewable technologies*
- *Develop heat supply networks to deliver low carbon heat in Reading*

HOW WE WILL ACHIEVE THE VISION

ELECTRICITY

The Carbon Intensity of Electricity

A range of different fuels are used to generate the electricity provided on the grid. High carbon fossil fuels such as gas and coal are used alongside lower carbon nuclear fuels and renewable energy such as wind and hydro-power.

National policy is set to reduce the amount of carbon dioxide emissions per unit of electricity produced for the national grid (its carbon intensity). Proposed electricity market reforms aim to shift electricity generation from fossil fuels to low carbon sources with a subsequent change of the UK energy mix. Reading will be supplied by energy that is generated both locally and further away (including Europe).

Small scale, locally generated energy tends to be used locally and therefore the more low carbon electricity that is generated locally, the lower the carbon emissions in the borough.

Our Electricity Consumption

In 2010, the borough used approximately 813 GWh (813,000,000 kWh) of electricity, with Reading's households using an average of 4,400kWh. However, the greatest consumption of electricity in Reading is in the commercial sector. This sector includes many different types of energy uses, from lighting in offices and shops to air conditioning, heating and computer equipment.

Reduction in consumption is widely recognised as the first stage in the energy hierarchy; once energy efficiency in buildings is maximised then supplying energy using renewable sources is appropriate. In order to meet the ambitious UK target of 80% reduction in emissions by 2050, however, it will be necessary to implement energy efficiency

measures alongside investments in energy supply, such as renewable energy and more efficient supply across the borough.

Strategic priority:

- ***Reduce electricity consumption within the commercial and public sectors***

Smart Electricity Grids

In order to efficiently use the power we generate and to cope with increasing amounts of less predictable renewable energy generation, energy storage and ‘smart’ ways of evening out our consumption are needed. e.g. smart electricity grids.

Strategic priority:

- ***Introduce smart meters and energy storage solutions in Reading***

HEAT

Our Heat Demand

In Reading, our homes and businesses are mostly heated using gas or electricity. Gas, although a fossil fuel, has a lower carbon footprint than electricity currently and installing efficient modern boilers can make a difference. In the future, however, we have to move to cleaner, greener energy sources to provide our heat, including electrical sources as the electricity supply becomes decarbonised.

About 1315 GWh (1,315,000,000 kWh) of natural gas is used across the borough to provide heat. Domestic use accounts for over half of the gas used in Reading. The largest use of heat is for heating the space inside buildings. The energy efficiency of a building relies on its insulation level and the efficiency of its heating system.

District Heating - Heating Neighbourhoods

District energy schemes can heat multiple buildings using waste heat from local power plants and/or renewable energy. Reading has earmarked certain areas where development could incorporate district heating networks, where heat is needed continuously such as housing, hotels, hospitals etc. Detailed planning policy sets out the requirement to consider this approach. Investment in decentralised energy would give Reading the opportunity to meet its local heat demand and continue to reduce carbon dioxide emissions.

Reducing our Energy Consumption

A great deal of the energy used in Reading is wasted. In many cases it is used to heat

poorly insulated buildings and to fuel and power inefficient, outdated equipment. Given the high carbon intensity of existing grid electricity, the most cost effective way to reduce carbon dioxide emissions, is to improve the energy efficiency of buildings.

Insulation schemes in the UK domestic sector have been funded through obligations imposed on energy utility companies by the government. In Reading a scheme run by the Energy Saving Partnership, Heatseekers, has delivered around 2000 measures since the introduction of the first climate change strategy in 2008. This accounts for around half of the registered grant funded measures recorded in Reading. Each of the measures installed can be estimated to save an average 0.6 tonnes of carbon emissions per annum and save the household an average of £155 in energy bills.

Strategic priority:

- ***Develop heat supply networks to deliver low carbon heat in Reading.***

RENEWABLE ENERGY

Renewable Energy as a Share of Reading's Energy Supply

Renewable energy is generated using natural resources such as wind, sun, ground heat and biomass. The UK has a target to generate 15% of its energy from renewable sources by 2020. As of 2011, about 3.8% of the UK energy was from renewable sources. In Reading 3% of our energy is currently sourced from renewable sources. Reading has agreed to make a step change in the use of renewable energy generation as part of its commitment to provide clean green energy into the future and to kick start the green economy, and is keen to upscale the deployment of renewable energy generation in line with the national target of 15%. However, geography and prevailing weather conditions play a key role in the number of viable sources of renewable energy within an area.

A report on the current renewable energy generation in Reading and Berkshire was carried out by Thames Valley Energy. These studies indicated around 8.5% of total energy can be generated locally using renewable resources available in Reading, with the balance consisting of a share on the renewable electricity on the national grid. The report identifies around 12MW of electrical generation capacity and 18MW of renewable heat generation capacity that would provide around 8% of local power generation.

With incentive schemes designed to promote investment into renewable energy technologies, business cases are more likely to show returns on investment.

Companies and community organisations may offer to finance renewable energy systems on houses and land and recoup the incentive payments. These organisations are typically referred to as ESCos (Energy Service Company). ESCos may also offer investment into energy efficiency services.

Strategic priority:

- ***Increase amount of energy generated locally using renewable technologies.***

Renewable Electricity Resources in Reading

Reading's natural resources provide the potential for solar, hydro and to a lesser extent wind, generated energy. Waste and wood also offer significant potential for heat and electricity generation through combined heat and power systems.

Solar Panels

Solar panels are much more common since the introduction of financial incentives. Though these incentives have recently reduced, the Council has installed solar panels on 40 buildings in Reading, and overall there are around 500 further households who have installed electricity generating solar panels.

Hydropower

Reading sits at the confluence of the rivers Thames and Kennet, providing further potential for hydro-power energy generation, in addition to that produced by the Mapledurham turbine, which generates around 0.5GWh per annum.

Wind

Onshore wind is used to generate electricity. Whilst Reading is not a 'windy' place, it is considered viable and the Green Park turbine produces enough electricity to power 730 homes. Wind remains a significant opportunity for local renewable energy generation.

Renewable Heat Resources in Reading

Whilst renewable electricity can be easily transmitted over significant distances, this is not the case with heat, which makes renewable heat generation more of a challenge.

Reading's resources include the availability of wood (Berkshire provides an extensive wooded area), ground source heat and the large volumes of waste and sewage, which urban centres create, and which can be used to generate energy via anaerobic digestion.

Biomass

Heat is generated from the combustion of wood and energy crops. It can provide continuous and consistent flow of energy with less variability compared to other sources of renewable heat. Carbon dioxide emissions are considered neutral as they are captured by the photosynthesis process. Forest management processes are important to make sure that new wood growth provides further fuel and to capture carbon. Transport and

forestry operations use fossil fuels and therefore the process cannot be described as entirely carbon neutral. About 1% of the total UK heat demand is sourced from biomass with the potential to provide up to 6% by 2020 (UK Bioenergy Strategy).

To successfully implement biomass it is crucial that fuel is from sustainable sources and preferably from local suppliers. Biomass can create local supply chains and improve the sustainable management for the benefit of both woodland biodiversity and climate change.

However, biomass does affect air quality, as combustion emits particulate emissions (smoke) and nitrogen dioxide (gases). Particulate emissions are not high in Reading and so there are no special control areas for this pollutant. Particulate emissions can be controlled using air pollution control equipment before the discharge flue.

Biomass remains a good option for providing renewable heat in Reading. Where there is a sufficiently high requirement for heat in a small area, combining district heating systems with biomass could provide an efficient low carbon solution.

Ground and Air Source Heat Pumps

Ground source heat pumps are used to obtain heat from the ground. The system typically uses 1 unit of electricity to deliver 3-4 kW of heat or cooling as required. Reading has been identified as particularly suitable for ground source systems, due to its geology and the mobility of ground water.

Air source heat pumps use the same concept but use the outside air instead. They are generally less efficient than ground source heat pumps as the ground stores more heat than the air. A study by the Energy Saving Trust (EST) showed system efficiencies of 1.82 and 1.86 for systems with radiators and under-floor heating respectively⁵

Comparing this with a domestic gas heating system, the heat generated by an air source heat pump has a greater carbon intensity and a higher price at the current time.

Anaerobic Digestion

This is the name given to the biological process of digesting organic material such as food waste and/or sewage in a sealed vessel to create natural gas. This natural gas can then be combusted to provide heat and power. Reading's sewage treatment works run by Thames Water use this process to treat sewage waste. The heat and electricity generated are then both used in the on-site process of sewage treatment.

⁵ Dunbabin, P & Wickins, C: Detailed analysis from the first phase of the Energy Saving Trust's heat pump field trial, URN 12D/018, London: DECC, March 2012.

Waste heat

Wherever processes have waste heat there is potential to utilise this locally to reduce the amount of fossil powered heat that is needed. This could range from harnessing heat from computer servers within larger commercial buildings to large scale industrial processes being used to power district heating systems.

A BUSINESS PERSPECTIVE

Business accounts for 48% of energy use in the borough and therefore has a significant role to play in reducing energy consumption and selecting decarbonised forms of energy. Rising energy prices also constitute a substantial risk that businesses must manage. Where businesses are owner occupiers - or are able to specify insulation, heating, ventilation and air conditioning systems as part of a new development or refurbishment - there are sound commercial benefits associated with investing in more efficient use of energy and on-site micro-generation. Incentives such as Feed-in tariffs and the Green Deal are available for businesses as well as domestic energy users, and these, combined with the reduction in energy costs, often allow pay-back within normal commercial timescales. Other sources of funding exist that are targeted specifically at businesses, for example the Energy Efficiency Financing programme delivered through The Carbon Trust. In addition, the Enhanced Capital Allowance Energy Scheme allows SMEs to claim 100% first-year tax relief on investments in energy-saving products and technologies.

The vast majority of businesses are SMEs and most of these are tenants. When a business doesn't own its premises, it has less control over the specification of buildings and the equipment that is installed in them. Reducing the energy consumed by business therefore has to involve commercial landlords and developers. Businesses only have the opportunity to influence leases at initiation and break-points, and even then it can be difficult to convince landlords to invest in measures that won't increase their return on capital. Payback periods may be longer than the tenancy period, and leases often require tenants to pay for any changes made to be reversed on termination, so making the business case can be challenging. "Green leases" have been pioneered by the Better Buildings Partnership, a group comprising some of the UK's more enlightened commercial property owners; these provide mutual contractual lease obligations for tenants and owners to minimise environmental impact in areas such as energy, water and waste.

There are, however, steps that can be taken by all businesses to avoid energy being wasted in the course of business, through the use of more energy-efficient business equipment and more efficient patterns of use. There are both financial and reputational benefits to adopting a methodical approach to monitoring and minimising energy use. We can be confident that energy prices will continue to increase, so prudent use of energy and minimisation of energy costs are essential to control operating costs; operational efficiency releases funds that can be re-employed in more productive ways. Although it is

harder to quantify, there is also a reputational benefit to being a “low-carbon business” which can be instrumental in winning contracts from customers with a strong sustainability focus. In some sectors it is a minimum requirement that suppliers are able to demonstrate effective systems and processes for controlling carbon emissions.

Some energy efficiency measures involve significant investment and it can be harder to make a compelling business case. Innovative business models, for example “pay per lux” for LED lighting, are beginning to emerge, enabling the higher capital cost of innovative technology to be converted to an operating expense. These innovations create opportunities for new product-service systems, creating new market segments and stimulating competition.

Carbon offsetting is one option available to businesses, but it should not be seen as an alternative to reducing operational emissions. In the context of this strategy, only genuine emissions reductions count towards achievement of our shared target.

LOW CARBON DEVELOPMENT

INTRODUCTION

The quality of the built environment is of crucial importance in reducing our contribution to climate change through reducing the amount of energy we use in buildings. Insulating and improving the efficiency of our existing buildings and building highly efficient new buildings are critical to reducing our energy consumption and carbon footprint.

This theme addresses how the built environment might be managed and developed to respond to the threat of climate change, whether through the development of more energy efficient buildings, at the same time reducing energy costs and addressing fuel poverty, or through the need for long-term strategic planning.

To adapt to climate change and achieve sustainable development, long-term economic, social and environmental strategies must continue to evolve and guide the revision of spatial development policies for the future.

VISION FOR 2020

By 2020 Reading will have reduced its energy consumption from buildings through improved design, construction and refurbishment of existing buildings. All new buildings will meet 'zero carbon' standards.

Reading has planning policies in place that reduce energy consumption. As 'zero carbon' standards are established (in 2016) for new build, planning policies will emphasise local retrofit and renewable energy programmes and other ways to reduce emissions from the local area.

Planning policies and standards for buildings will address energy use, energy embodied in construction, and the local effects of climate change. Strategic planning will assess the long-term implications of development trends on reducing carbon emissions and adapting to the effects of climate change.

SUMMARY OF STRATEGIC PRIORITIES

- ***Buildings in Reading to be built to high standards of energy efficiency (i.e. zero carbon standards), incorporating on-site renewable energy where possible⁶***
- ***Retrofit energy efficiency measures into Reading buildings***
- ***Improve properties to reduce fuel poverty in Reading***
- ***Enable the uptake of Green Deal and associated grants in Reading.***
- ***Minimise the ‘embodied carbon’ incorporated into construction projects***
- ***Continue to develop planning policies that:***
 - ***support the reduction of green house gas emissions directly and indirectly from the borough.***
 - ***reduce the risks of inevitable climate change to the communities of Reading.***

HOW WE WILL ACHIEVE THE VISION

STANDARDS FOR LOW CARBON BUILDINGS

Significantly from 2016 it is the government’s intention that all domestic new build properties will be required to meet the emerging ‘zero carbon’ standards.

Building Regulations, which now include strict standards for insulation and ventilation, apply to most built development and compliance is mandatory. All buildings built, rented, or sold now require an Energy Performance Certificate (EPC) based on their design, but currently there are no required standards of actual energy consumption. From April 2018 all property for rent or sale will be required to meet EPC standards E rated or better.

Reading currently has planning polices that require developers to exceed the mandatory building control standards for energy efficiency. In 2013 Building Regulations will change again and will demand compliance with higher standards. Further planned changes to the Building Regulations including the move to ‘zero carbon’ homes in 2016 (non-domestic buildings to be ‘zero carbon’ by 2019) are expected to increase energy efficiency and encourage greater use of local renewable and low carbon energy supply.

The emerging Building Regulations definition of ‘zero carbon’ for domestic buildings sets a maximum energy input based on floor area, but does not cover energy use for cooking

⁶ SP wording to be agreed at Reading Climate Change Partnership Board on 10th July

and appliances. It does allow for off-site low carbon and renewable energy generation. A 'zero carbon' building could therefore still require significant energy inputs.

Therefore, it will be necessary to ensure that high insulation standards are applied to minimise the dependency on external energy supply for heating e.g 'MINERGIE' or 'Passive House'.⁷ It will also be necessary to provide low carbon energy sources, as considered in the 'Energy' chapter.

With 'zero carbon' requirements from 2016, there will be a need for developers to demonstrate that, where they are not able to meet zero carbon on site, they are investing into carbon dioxide emission reductions elsewhere to compensate. A local Community Energy Fund⁸ could allow developers contributions to be invested in local projects which would benefit the local green economy and fuel poverty objectives (*see section on 'fuel poverty' below*).

Strategic priority:

- ***Buildings in Reading to be built to high standards of energy efficiency (i.e. zero carbon standards), incorporating on-site renewable energy where possible***

IMPROVING EXISTING PROPERTIES

The majority of existing homes and buildings will still be standing in 2050, so it will be important to undertake a significant programme of retrofit and energy demand reduction across almost the entire housing stock. This refurbishment work will need to consider issues around reducing emissions of greenhouse gases, improving energy security, tackling 'fuel poverty' and creating 'green' jobs.

Householders and businesses may feel confused about different options on offer to install renewables and some guidelines could help them when deciding on the best available option (e.g. buy solar panels, etc), particularly as planning permission or listed building consent may be needed. There is a similar need for guidance about retro-fitting insulation and other energy-efficiency measures. This guidance would best be developed in local partnership. Examples of low carbon buildings, whether new-build or improved existing stock, can be used to demonstrate the benefits of good practice.

⁷ MINERGIE® is a sustainability brand for new and refurbished buildings. It is mutually supported by the Swiss Confederation, the Swiss Cantons along with Trade and Industry and is registered in Switzerland and around the world and defended firmly against unlicensed use.

Passivhaus buildings provide a high level of occupant comfort while using very little energy for heating and cooling. They are built with meticulous attention to detail and rigorous design and construction according to principles developed by the Passivhaus Institute in Germany, and can be certified through an exacting quality assurance process.

⁸ A local Community Energy Fund is defined in the Climate Berkshire - zero Carbon Standards study 2012.

⁹ Marmot Report Health Impacts of Cold Homes and Fuel Poverty

¹⁰ DECC estimate

Ideally new buildings will be built to last without requiring further retro-fit, but in determining appropriate standards for retro-fit there is a potential conflict between implementing relatively low-cost measures that will bring short-term benefits (warmer homes, reduced emissions, economic returns at current prices) but are likely to require costly retro-fit of additional measures by 2050, and more expensive measures that are unlikely to require further expenditure.

In the context of developing technologies and uncertain costs for energy and carbon, this is a difficult area and the availability of 'off the shelf' solutions is ever evolving. Some means of taking account of the ease and cost of retro-fit to higher standards should be developed.

Fuel poverty

An added benefit to making homes more energy efficient is the consequent reduction in 'fuel poverty'. Where householders struggle to heat their homes, due to low incomes and high bills, they are described as being in fuel poverty and tend to face higher risks to their health such as cardiovascular and respiratory diseases and their mental health. Children's educational attainment can also be impacted and there are more 'excess winter deaths' associated with those in fuel poverty⁹.

In Reading in 2011, around 9.8% or 6239 households are regarded as being in fuel poverty¹⁰. Reading Borough Council surveys housing in Reading against the. At the last 'Decent Homes' survey of privately-rented homes in Reading in 2006, 32% of houses were classed as having a 'category 1 hazards on excessive cold'.

Reading has operated a number of schemes in areas that are particularly at risk of fuel poverty, providing free loft and cavity wall insulation, alongside a range of other measures to help householders to be safer and more secure in their homes.

Green Deal

The Green Deal is the government's flagship scheme to retrofit buildings in order to make them more energy efficient, launched in 2013. The scheme provides householders with the opportunity to use their future energy savings to pay for energy efficiency measures to be installed in their homes. The scheme is designed to create a market in energy efficiency that goes beyond previous approaches which focused on loft and cavity wall insulation.

In the case of tenanted properties, tenants will pay the Green Deal charge on their bill, with the charge shifting to the landlord when the property is vacant and passing on to future tenants when re-let. The landlord is required to enable Green Deal works upon request after 2016 and will be required to carry out works on their property if it fails to meet an Energy Performance Certificate rating of E by 2018.

Reading is a city with a large number of historic houses, many of which have poor energy

efficiency ratings, and there are likely to be many opportunities for householders to improve their homes. Through the recent government funded Green Deal Pioneer Places project, the Council visited over 800 homes, and over 500 householders went on to book assessments for Green Deal.

Where homes are expensive to insulate (e.g. solid wall Victorian houses), or where householders are at risk of being in fuel poverty, there are subsidies available. These are estimated to total around £1.3bn per annum.

Embodied carbon - construction impacts

Considerations of the climate impact of construction go beyond the 'running cost' of the buildings in terms of carbon emission and should extend to whether refurbishment is better than demolition and rebuild in terms of the 'embodied' energy (the total carbon emissions created throughout the construction process) and other natural resource impacts. There are benefits and dis-benefits of high and low density of developments. Consideration of lifecycle energy consumption and embodied impacts are needed. This is considered further in the 'Procurement, Supply and Consumption' and chapter.

Strategic priorities:

- ***Retrofit energy efficiency measures into Reading buildings***
- ***Improve properties to reduce fuel poverty in Reading***
- ***Enable the uptake of Green Deal and associated grants in Reading.***
- ***Minimise the 'embodied carbon' incorporated into construction projects***

STRATEGIC PLANNING AND DEVELOPMENT CONTROL

The National Planning Policy Framework (NPPF) includes many references to sustainable development and climate change and places the onus on local authorities to develop detailed policies, in the absence of more detailed national and regional guidance.

Success in achieving a low-energy low-carbon future will require current strategies and policies to be reviewed and adapted. Any long-term strategy for development that takes account of climate change will need to reconcile a number of potentially conflicting policy aims:

- Reducing emissions from transport both within and outside Reading
- Encouraging a thriving economy that supports growth in the 'green economy' and local services

- Provision of ‘good’ housing (easier to manage for a stable demographic rather than Reading’s growing population)
- Low carbon energy supply, water supply, and waste management (there will be limits to local exploitable low carbon energy supplies and water resources) based on geography and meteorology; the more that is required the higher will be the cost
- Reducing the local impacts of a changing climate through the design of buildings and infrastructure that support the population of Reading

Reading should continue to review its strategic plans to ensure they continue to be compatible with local and national emissions targets, and with other local policy aims.

Strategic priority:

- ***Continue to develop planning policies that:***
 - ***support the reduction of green house gas emissions directly and indirectly from the borough.***
 - ***reduce the risks of inevitable climate change on the communities of Reading.***

A BUSINESS PERSPECTIVE

Few businesses have the luxury of being able to design and build their own premises, but for those that do the benefits of commissioning low carbon buildings are becoming stronger. Reading’s planning policies already encourage the design of commercial buildings to at least BREEAM Very Good standard, and this is a material consideration in the determination of planning applications. With energy costs on an upward trend this is likely to pay dividends in the future; commercial buildings constructed on a speculative basis are likely to be more appealing to potential occupiers if they have a good energy performance rating, due to the reduced operating costs this will deliver. Other sustainability standards for commercial buildings include SKA, an environmental assessment tool for sustainable fit-outs.

The emergence of new energy efficiency and renewables products and rating standards, together with government initiatives like the Green Deal, provides commercial opportunities for both entrepreneurs and established businesses, by creating new markets and stimulating demand. Up-skilling to deliver low-carbon solutions for both domestic and commercial customers will be a source of significant revenue for those who already work in construction and associated industries.

NATURAL ENVIRONMENT

INTRODUCTION

The natural environment plays a key role in making our urban spaces liveable, both for people and wildlife. Tree planting, for example, can help mitigate both the ‘heat island’ effect (where an urban area is significantly warmer than its surrounding rural areas due to human activities) and the emissions that impact on both climate change and air quality.

In response to climate change, communities of wild animals and plants will have to relocate from places that are becoming unsuitable for their survival to places where conditions are becoming more favourable. The way that open spaces and parklands are managed can have a significant impact on wildlife corridors and habitats and consequently on wildlife’s ability to survive.

This chapter addresses how the natural environment should be managed and developed to respond to the threat of climate change, including the role of the local community, to make Reading a better place for people and for wildlife.

VISION FOR 2020

Reading will have a thriving and interconnected natural environment, with links and stepping stones, such as parks, back gardens and river corridors. Wildlife will be able to live in and move through the urban environment, allowing it to adapt to a changing climate.

The community will understand the role that trees and other planting plays in reducing the effects of climate change and new tree planting will be provided as standard in new development sites. The community will be more involved in the management of local green spaces.

SUMMARY OF STRATEGIC PRIORITIES

- *Protect wildlife from impacts of climate change*
- *Encourage local community groups and businesses to become more involved in the management of local green spaces*

HOW WE WILL ACHIEVE THE VISION

EXISTING POLICIES AND STRATEGIES

There are currently various policies in place that relate to the natural environment, such as the Council's Biodiversity Action Plan 2005-2015 (BAP), Tree Strategy, Open Spaces Strategy, Thames Parks Plan, the Reading Water-space vision and the Lower Kennet Valley Management Plan.

Although Reading's Biodiversity Action Plan does not specifically refer to climate change, it does recommend that, as Reading develops, a structured mosaic of habitats is created through the planned incorporation of appropriately located corridors and buffer zones

The Local Development Framework also addresses green spaces, wildlife and the natural environment in specific sections of the Core Strategy, sections of the Sites and Detailed Policies Document, and sections of the Sustainable Design and Construction Supplementary Planning Document. To ensure that wildlife aspects and green infrastructure are given more weight in development control, a Supplementary Planning Document (SPD) on the Natural Environment could be developed including landscape design, biodiversity enhancements and Sustainable Drainage Systems.

In addition, some of Reading Borough Council's large publicly owned meadows receive funding through Natural England's High Level Stewardship scheme and the Council and Berks, Bucks and Oxon Wildlife Trust are involved in the Berkshire Local Nature Partnership, building on the work already done by the Berkshire Nature Conservation Forum.

A further two key areas for action are to review the Biodiversity Action Plan when it expires in 2015 so that it takes a more holistic approach to the conservation and enhancement of biodiversity and to ensure the Berkshire Local Nature Partnership is appropriately resourced and functions effectively.

WILDLIFE IN DEVELOPED AREAS OF READING

'Ecological permeability' is the term used to describe the ability of wildlife to re-locate through an area. In urban areas permeability is improved by including features such as trees, green roofs, watercourses, allotments, playing fields, grass verges, and hedges, creating continuous linear features and reducing the distances between areas with suitable habitat.

Wildlife can also be made more resilient to climate change by increasing the amount of available (or linked) habitat to create larger, more stable populations of flora and fauna. Small isolated populations are vulnerable.

‘Green infrastructure’ is the network of natural environmental components and green and blue spaces that lies within Reading’s urban area and which provides multiple social, economic and environmental benefits. In the same way that the transport infrastructure is made up of a network of roads, railways, airports and ports, green infrastructure has its own physical components, including woodlands, parks, rivers, street trees and gardens.

As a community grows, it upgrades its grey infrastructure (roads, sewers, energy distribution etc.) but also needs to upgrade its green infrastructure. A ‘green infrastructure’ approach differs from conventional approaches to open space planning because it considers multiple functions and benefits, along with land development, growth management and built infrastructure planning. Successful land conservation in the 21st century needs to be more proactive, less reactive and better integrated with efforts to manage growth and development.

Reading Borough Council will continue to work with developers, partnership agencies and the general public, to both increase and improve areas of wildlife habitat and to improve the ecological permeability of the urban area.

Increasing tree coverage in appropriate locations using trees that are drought tolerant where appropriate and capable of thriving in predicted future conditions, should be a particular priority.

KEY WILDLIFE SITES IN AND AROUND READING

‘Local Wildlife Sites’ (formerly known as Wildlife Heritage Sites) are non-statutory areas identified by the Council because of their local wildlife value. They are designated if they meet certain criteria such as:

- containing habitats and species that are nationally uncommon as well as threatened
- supporting a diverse range of species and habitats and can be very important areas of biological richness
- acting as wildlife corridors or links between other important habitats and are important in aiding wildlife to move around the countryside
- functioning as buffers to more sensitive sites helping to protect core wildlife areas

Reading has approximately 25 Local Wildlife Sites; four of these sites are also designated as Local Nature Reserves.

In addition to these, there are a series of Biodiversity Opportunity Areas across Berkshire. These areas have been identified by the Berkshire Local Nature Partnership as potential areas for biodiversity enhancements. In Reading there are two BOAS:

- The Kennet Valley East BOA - from Newbury to Reading extending to include large

areas of gravel pits in the east and in Reading includes the Kennet floodplain east of the A33.

- West Reading Woodlands BOA - which includes most of the woodland in Tilehurst

Strategic priority:

- ***Protect wildlife from impacts of climate change***

COMMUNITY INVOLVEMENT AND EDUCATION

Local community groups are important in the management of local green spaces, but different groups are often unaware of each other's activities. There is a need to promote more partnership work, in particular between local groups and individuals and organisations with Berkshire wide remit.

Current projects include the Council's Outdoor Classrooms, and the Council's volunteer days and support of voluntary groups in its parks. More education and involvement of the public in land management for wildlife, e.g. guided walks, wildflower trails, and other local activities would be beneficial.

There are also potential opportunities for community involvement in the use of public land for growing food purposes (e.g. Food4Families, Transition Towns Reading, Food Group projects) and in the development of more city farms and community gardens. Such projects would provide a range of benefits, including some for wildlife.

See also chapter on 'Community' for more on community activity and local food production.

Strategic priority:

- ***Encourage local community groups and businesses to become more involved in the management of local green spaces***

A BUSINESS PERSPECTIVE

The commercial relevance of the natural environment may not be immediately apparent to the average business, but business impacts can be extensive and wide-ranging. Many products and materials used by businesses cause environmental damage, although this is often experienced in a remote region. For example, the rare earth and other metals contained in the technology products that drive our information economy have to be mined, with potentially disastrous impacts on the natural landscape and ecosystem. This can both displace indigenous people, causing unwanted social impacts, and damage habitats, putting species at risk of extinction. These effects may seem remote and

irrelevant, but consumers are becoming concerned about the ethical choices of brands and increasingly less willing to buy products associated with environmental or social harm further up their supply chain. Campaigns like Friends of the Earth's Make it Better help to bring supply chain impacts to the attention of both consumers and manufacturers. By being mindful of these "hidden" impacts, and taking concrete steps to mitigate them, businesses can demonstrate high ethical standards and build trust which assists with customer retention and creates new business opportunities.

Closer to home, the UK already has effective legislation to prohibit the pollution of land, air or waterways and compliance represents the absolute minimum requirement. For businesses that wish to do "more good" rather than "less bad", protecting the natural environment and promoting biodiversity in and around commercial premises can improve working conditions and staff morale. It also demonstrates good corporate responsibility, which carries a reputational benefit. Landscaping can help with energy efficiency, for example by using vegetation screens to protect against solar gain through south-facing windows and thereby reduce the need for mechanical cooling. Environmental clean-up events are a popular staff volunteering activity and adopting a local green space can be a valuable way of creating a positive relationship with domestic neighbours.

WATER SUPPLY AND FLOODING

INTRODUCTION

A changing climate is expected to mean more extreme weather events such as intense rainfall and floods, heatwaves and droughts. These impacts are predicted to increase over time, with winters getting warmer and wetter, while summers become hotter and drier.

Hotter, drier summers will tend to increase demand for water and reduce supply while more variable winter rainfall may increase the frequency of droughts despite the increase in average rainfall. This could have significant impacts on biodiversity and the natural environment.

This chapter sets out measures to adapt to the threats to water supply and to the risks of flooding.

VISION BY 2020

Supply and demand for water will be managed so as to improve the projected 'supply demand balance', reduce the risks of 'temporary use bans' (hosepipe bans), and reduce the effects on wildlife of poor water quality and of damage to habitat through drought.

The risks of changing patterns of rainfall and extreme weather events will be better understood and people will be well prepared with homes and businesses becoming increasingly resilient.

SUMMARY OF STRATEGIC PRIORITIES

- *Manage supply of and demand for water to reduce the expected impact of water shortages on consumers and on wildlife*
- *Reduce the carbon footprint of water supply and water heating*
- *Reduce the risk of damage due to flooding*

HOW WE WILL ACHIEVE THE VISION

WATER RESOURCE MANAGEMENT

The main water source for Reading is surface water from the river Kennet which is treated at the Fobney Island Water Treatment Plant, in the south of the Borough. Smaller amounts of water are extracted at Pangbourne and Playhatch. The River Kennet and its tributaries are largely groundwater fed, so abstraction from surface water and from groundwater near to surface watercourses could impact on water supply.

Thames Water is responsible for Reading's water supply, sewage treatment, and much of its surface water drainage. The organisation produces a Water Resource Management Plan (WRMP) every five years, which sets out how it plans to provide water to meet customers' needs while protecting the environment.

For 2011, the WRMP shows almost 33% surplus water available against the 'average daily demand in a peak week of a dry year', though this surplus drops to just under 9% by 2039. Low winter rainfall can reduce the levels of groundwater and of water in underground aquifers, which can lead to water shortages in the summer. So despite the forecast surplus, Thames Water's agreed levels of service allow restrictions on supply in drought conditions - a sprinkler ban one year in ten on average and a 'temporary use ban' (formerly hosepipe ban) one year in twenty. Demand is expected to rise while supply falls.

The Environment Agency (EA) produces Catchment Abstraction Management Strategies (CAMS) to assess the amount of water available, sets out licensing policies to protect the environment from over-abstraction, and monitors water levels, water quality, and water availability.

The EA is required by the Water Framework Directive to ensure that all rivers reach Good Ecological Status or Potential by 2027. Maintaining good water flow rates improves river ecology by dilution of planned or un-planned discharges and runoff that enter rivers.

Reducing Demand for Water

Reducing demand for water reduces the costs of supply and waste water treatment, makes supply restrictions less frequent, and protects the environment from over-abstraction.

Potential measures to reduce demand include: identifying and reducing leakage (which accounts for over 20% of 'dry year distribution input'); using water meters to charge for water used (estimated to save around 10% per household); installing water efficiency measures such as diffusers, dual flush toilets and low-flow shower heads; rain water harvesting; and grey water re-use.

Grey-water recycling and rainwater harvesting (other than systems like water butts for garden use) can reduce mains water use but tends to increase energy use and carbon footprint due to the energy-intensive processing required. They are often too costly at dwelling level, but more affordable for large commercial buildings, especially those newly built.

Thames Water maintain that all businesses, and new and converted domestic properties, are fitted with meters. In the future, smart water meters, which allow customers to monitor water usage closely, could reduce meter-reading costs, help to identify leakage, facilitate implementation of 'social tariffs', and allow the charge for water to be varied in order to incentivise water saving.

However, because the WRMP currently shows a surplus, Thames Water say that, in the Kennet Valley Water Resource Zone, they cannot immediately prioritise measures to reduce leakage, and propose to start to roll out compulsory metering only from 2020. However they are committed to promoting the wise use of water and offer free water-saving devices to consumers, fit water meters free of charge on request, and are keen to co-operate with other parties to reduce water demand from new developments or refurbishments by providing equipment and advice.

For new housing, Building Regulations set a mandatory standard of 125 litres per person per day (l/h/d) for maximum consumption of potable water (compared with an average of 145 litres of water per person per day, supplied within the Kennet Valley Water Resource Zone, which includes Reading). Including water efficiency standards in planning policy can help to ensure that new housing stock and commercial buildings are built to high standards, in order to help reduce demand.

Reading Borough Council's Sustainable Design and Construction policy calls for:

- new homes to meet Code for Sustainable Homes (CFSH) levels 3 and 4 for which 105 (l/h/d) is mandatory.
- Maximum consumption of 5,500 litres per year per person for office developments.

CFSH level 3 can be achieved at little extra cost per dwelling (estimated at £125). The London Gateway project has shown that a water efficiency standard of 95l/h/d can be achieved without grey-water recycling and rainwater harvesting but this is more expensive per dwelling (estimated at £500 per home).

Strategic priority:

- **Manage supply of and demand for water to reduce the expected impact of water shortages on consumers and on wildlife**

HOT WATER USE AND CARBON EMISSIONS

Carbon dioxide emissions resulting from water use in the home are typically 800 kg per household per year¹¹, with 89% of this attributable to water heating in the home. Only 11% is attributable to water supply and wastewater treatment and Thames Water has an active programme to address the energy intensity and carbon footprint of its operations to reduce this further.

Reducing the amount of water taken from the supply will therefore have a fairly small effect on carbon emissions unless very large quantities of water are involved. A 10% reduction in a household's consumption would save around 9 kg CO₂ - less than 0.3% of the 3,200 kg footprint from energy use in the home for a typical household.

Reducing the use of hot water is therefore a priority. Consumers may be encouraged to change their behaviour in order to save money (particularly if the water is heated with on-peak electricity) at the same time as saving water and reducing carbon emissions.

This can be achieved through taking showers not baths and the use of low-flow showers, shower timers, water-efficient dish- and clothes-washing appliances, and reducing the length of hot water pipe-runs.

Strategic priority:

- **Reduce the carbon footprint of water supply and water heating**

FLOODING

Climate change can affect local flood risk in several ways and the impacts will depend on local conditions and vulnerability.

Wetter winters may increase river flooding in both rural and urban areas. More intense rainfall causes more surface run-off, increasing localised flooding and erosion, which may increase pressure on drains, sewers and affect water quality. Storm intensity in the summer could increase, even in drier than average summers. Rising sea and/or river levels may increase local flood risk inland or away from major rivers because of the interactions with drains, sewers and smaller watercourses.

In particular for Reading, there is a risk of flooding from groundwater-bearing chalk and

¹¹ Energy Saving Trust Report CO167 - 2009

limestone aquifers across the district.

Reading Borough has been designated a Lead Local Flood Authority and has prepared a Preliminary Flood Risk Assessment (PFRA) and a Surface Water Management Plan, with flood hazard and risk maps required by June 2013, and flood risk management plans by June 2015.

Drainage

While modern developments have foul sewage piped directly to the sewage works and surface water drains direct to watercourses, most older sewers carry both foul sewage and surface water and roof run-off. This can create particular problems of pollution and overloading of sewage works at times of heavy rains.

Reading's Sustainable Design and Construction policy advocates implementation of 'Sustainable Urban Drainage Systems' (SUDS), a range of techniques to reduce the flood risk due to heavy rainfall, in new developments and redevelopments. These techniques include open space or permeable areas to allow rain to soak away, surface water drains, holding ponds, and flood relief areas that prevent sudden discharge of water to watercourses. Some of these techniques may become less effective after prolonged periods of wet weather so it is important that they are well-designed and implemented.

Reading will need to create a SUDS Approving Body (SAB) in accordance with the Flood and Water Management Act, probably by spring 2014. In developments where planning permission is required the SAB will have to approve drainage systems for managing surface water before construction begins to ensure compliance with yet-to-be-published national standards. The right to connect surface run-off to public sewers will be conditional on the drainage system being approved by the SAB.

The SAB must adopt and maintain approved SUDS that serve major planning applications (10+ dwellings and / or over 1000m²). After an initial 3 year period following the commencement of the SAB, this threshold may be reduced.

Although the legislation is not yet in place, Reading Borough Council's transport department require that all new roads serving new development must be drained by a SUDS system either through environmental measures (swales, balancing ponds) or engineering measures (attenuation tanks) to ensure surface water run-off is contained.

Adaptation

Measures to adapt buildings to address risks of flooding fall into two categories: resistance and resilience. Resistance measures prevent or limit the amount of water entering a building by identifying and blocking all possible entry points. Measures such as non-return valves on main drains, demountable door guards etc.

Resilience measures aim to reduce the time and cost of recovering from a flood. Measures such as raising electrical points above flood level, using water-resistant paint on lower walls, etc. Thames Water is carrying out a strategic risk assessment of the resilience of its processes and its capability to maintain its services to customers.

Strategic priority:

- **Reduce the risk of damage due to flooding**

A BUSINESS PERSPECTIVE

The impact of water scarcity varies greatly by business sector and for office-based businesses its commercial relevance can appear slight. Those businesses for which water is an essential raw material are well aware of the impact on their business that can be caused by an interruption of supply, but the indirect effects of water scarcity can impact the production of food crops and natural resources, causing price volatility in commodities that have a knock-on effect.

The water supply is all drinking quality, but many commercial flushing or washing operations do not need drinking water and can be carried out equally well with grey-water or rainwater. Building in (or retrofitting) grey-water recycling or rainwater collection systems to substantial commercial premises can be beneficial, as can adapting processes to use less water or adjusting frequency. Water used in one process could be re-used in another at the same site - or even by a different company; for example, water that has been used to wash food could be re-used to wash down construction equipment in a neighbouring business. As with energy, using less water can reduce costs, and as water becomes increasingly scarce, we can only expect those costs to increase.

The effects of flooding can have a very direct and damaging impact on business continuity. It can prevent staff from reaching their place of work or visiting customers, it can disrupt shipments of products or provision of services and it can directly damage the workplace. Increased flood risk also influences the cost of commercial insurance. Flooding should be an essential consideration in any business risk assessment or continuity plan.

TRANSPORT

INTRODUCTION

Every citizen's choice of transport impacts on climate change, road safety, air quality, and noise pollution.

The Climate Change Strategy 2008-2013 estimated that 12% of Reading's carbon footprint is attributable to transport (0.7 tonnes per capita in 2008). While this was well below the national average of 21% and compares favourably with the South East regional average and other urban areas in the region, there remains scope to reduce this further.

More generally, an effective transport system is fundamental to building sustainable and thriving local communities. Reading's excellent links to national road and rail networks as well as Heathrow Airport, have contributed towards the town becoming a major population and employment centre within the South East. The vitality and success of Reading has attracted significant investment from business, retail, sport and cultural sectors, and the town serves a catchment that extends far beyond the borough's administrative boundaries, resulting in a complex set of travel patterns.

However, the ability to continue to attract inward investment, while at the same time reducing carbon emissions in Reading, depends on efficient management of the transport network as demand for travel grows. The challenge is to minimise transport's contribution to green-house gas emissions, through reducing the need to travel, encouraging the use of more sustainable modes of transport and alternative energy sources and reducing congestion.

The 'Transport' theme covers how people move around, including 'active travel' such as walking and cycling, public transport such as buses and trains and private transport such as cars and vans. It also reviews the infrastructure that allows people to travel, and the impacts of travel choices on not only climate change, but also other aspects of the environment.

VISION FOR 2020

We will have achieved targeted and measurable reductions in green-house gas emissions from transport and created an infrastructure network which supports and encourages low carbon travel, while improving air quality.

Reading will have a healthier and more active population as more people choose to walk and cycle for short journeys whether to the town centre or other local destinations. The transport network will be less congested and safe for cyclists and pedestrians of all ages and abilities. People will use innovative and inclusive information to make smarter choices in the way they travel. Public transport will be efficient, reliable and affordable. Low carbon travel will be the preferred choice for people and goods moving around the town. Reading will have a reputation as a beacon for sustainable travel.

SUMMARY OF STRATEGIC PRIORITIES

- *Develop a transport infrastructure which supports more low carbon travel options for people in Reading*
- *Reduce energy use and embodied energy in transport infrastructure*
- *Encourage a step change to non-car travel from all sectors of the population through targeted advice, incentives and enforcement*
- *Manage transport infrastructure and services to prepare for climate change*
- *Reduce the air pollution from vehicles*

HOW THE VISION WILL BE ACHIEVED

The 2011 census 'journey to work' data shows that Reading ranks in the top 50 local authorities for percentage of commuters travelling by bus, rail, bicycle and on foot. Excluding the unemployed or those working from home, 18% of Reading residents walk to work, up from 12% in 2001. Public transport commuting has remained steady at 22%, whilst car commuting has fallen slightly and bicycle commuting has risen slightly. Reading's annual cordon count also reflects the high proportional use of sustainable transport for journeys into the town centre, with car trips falling from 27% in 2006 to 20% in 2011, whilst trips by sustainable modes of transport rose by 7%.

Building further on Reading's excellent track record of successful sustainable transport measures undertaken since 2001, we will continue to invest in accessible information and technologies to improve the efficiency and effectiveness of the transport network and systems in Reading and to help more people understand their travel choices and we will also continue to invest in new transport infrastructure and services to increase the choices available.

A number of plans and strategies are already in place for Reading, perhaps most importantly the Council's third Local Transport Plan (LTP3), which sets out transport policy for the period to 2026. The LTP3 Implementation Plan is updated through a rolling three year programme of measures. Reading Borough Council and its partners have secured approximately £25million from the Department for Transport's Local Sustainable Transport Fund to accelerate LTP policy projects and implement a committed programme to March 2015.

INFRASTRUCTURE AND INNOVATION

Transport infrastructure both impacts on and serves the needs of communities. The life and business benefits associated with good connectivity to the transport network need to be balanced against the impacts on noise and pollution levels, safety, and of course green-house gas emissions.

An over-riding objective is to increase trips by walking, cycling and public transport and other low carbon modes of travel. One way of achieving this is through developing the transport infrastructure to enable more people to travel by means other than private cars (modal shift).

Funding is now available from the Local Sustainable Transport Fund (LSTF) to deliver an extensive programme aimed at achieving modal shift, including new or improved pedestrian/cycling infrastructure, cycle hire, and new park and ride and rail sites. The programme extends to include parts of West Berkshire and Wokingham to address wider impacts of travel to and from Reading.

Current targets set for the our transport investment programme to March 2015 is to achieve an additional 7,200 daily bus trips; additional 12,050 daily walking trips; and additional 2,300 cycle trips, resulting in an approximate 10% reduction in congestion and 29,000 tonne reduction in CO₂. This equates to a 7.5% reduction in car trips, a 4% increase in public transport trips, a 10% increase in cycling trips and a 5% increase in walking trips. It also represents a 3% reduction in carbon emissions per capita and a 25% reduction in Reading's carbon footprint attributed to transport.

Through the LTP3 Implementation Plan and development planning, other measures such as car clubs, car sharing schemes, infrastructure to support electric vehicles, cycle training, etc. are extended and promoted.

The environmental impacts of all new infrastructure is assessed and ways to minimise carbon emissions in construction and in future maintenance are explored. Also included in the LSTF programme are measures to directly reduce energy use through the installation of low energy street lighting and the reduction of unnecessary illuminated street furniture.

Transport infrastructure and the people that depend upon it are at risk from the impacts of climate change, including more extreme weather in terms of heat, cold and flooding. Therefore, developing and maintaining strategies for adaptation and up-to-date, publicly-understood policies for issues such as winter maintenance and flood management are crucial to supporting Reading's neighbourhoods and networks.

Strategic priority:

- ***Develop a transport infrastructure that supports more low carbon travel options for people in Reading***
- ***Reduce energy use and embodied energy in transport infrastructure***

INTERVENTIONS AND INCLUSION

In order to reduce carbon emissions from transport by 80% on 1990 levels by 2050 (the UK target), we require a step change in behavioural attitudes to non-car travel from all sectors of the population (*see also the chapter on 'Education, Communication and Influencing Behaviour'*).

We need to break down perceived barriers to walking and cycling. Partnerships are already in place with major organisations such as Sustrans and CTC the national cycling charity, as well as health providers, educational institutions, major employers and local groups. Among other projects, an updated Cycling Strategy is due in 2013 to reflect the increased priority of cycling and local partnership activity.

Accessible information technology can make it easy and more affordable for people to choose and use low carbon travel. The LSTF programme includes improvements that will build on Reading's position as a centre of expertise for transport management and information technology. Personalised travel planning, smartcard ticketing and incentives schemes, and real-time data for transport are intended to support alternative travel choices.

The design of neighbourhoods can encourage people to choose to travel more sustainably and actively. Safety and the perception of safety is a key enabling factor in people choosing to walk or cycle to their destination. Continued enhancement of cycling and pedestrian facilities is an ongoing priority for Reading, as is ensuring good pedestrian and cycling routes exist to community and town centres. For new developments, this means that Planning is an important means of influencing the design of such infrastructure. Removing the need to travel removes the transport impacts of that travel. Enabling people to work and access services on-line is therefore one critical component.

Strategic priority:

- ***Encourage a step change to non-car travel from all sectors of the population and delivery agencies through targeted advice, incentives and enforcement***

AIR POLLUTION

Another impact of the increase in use of fossil fuelled vehicles is the increase in air pollution. Air pollution has both global and local impacts. Emissions from vehicles contribute to the global concentration of green-house gases, and are therefore direct contributors to global climate change. In addition emissions of certain pollutants are harmful to human health at a local level, causing respiratory and pulmonary conditions. They can also cause harmful effects on plants and animals as well as corroding materials and buildings. The main pollutants that affect health in Reading are nitrogen dioxide and particulates from the combustion engine. However, not all measures that may reduce carbon emissions also reduce air pollution e.g. the use of more efficient diesel vehicles.

In addition to pollution from transport use, climate change itself can also directly contribute to the conditions of high concentrations of harmful pollutants, in particular ozone, which tends to occur in certain weather conditions and increases concentrations of nitrogen dioxide.

By diverting trips from private vehicles to more sustainable transport options, particularly walking and cycling, and by enforcing better emission standards, emissions associated with the combustion engine and air quality improves.

Strategic priority:

- ***Reduce the air pollution from vehicles***

A BUSINESS PERSPECTIVE

Business is responsible for a significant proportion of transport emissions and has enormous potential to reduce transport-related emissions. The strategy's aims of reducing the need to travel, encouraging the use of more sustainable modes and alternative energy sources are very relevant to business. There are three main components to business travel impacts - freight, personal travel in the course of business and personal travel to and from the workplace. Not all of these will apply to every business, so taking them one by one:

Freight: Transporting goods contributes significantly to the UK's carbon emissions. There is potential to reduce this in numerous different ways. Some of the more direct options are choosing lower emissions vehicles, optimising delivery routes, re-designing packaging to reduce the weight or volume of cartons and consolidating consignments to maximise utilisation of vehicles. Taking a more holistic approach, based on the principles of the circular economy, it can also be possible to reduce transport impacts by replacing a physical product with a service, or by collaborating with other companies to share distribution networks or set up freight hubs. With fuel costs steadily rising, reducing the use of fuel for freight can also reduce costs, improving both profitability and competitiveness.

Travel in the course of business: Most businesses need to visit customers or suppliers, but the frequency of these visits can often be reduced without any negative impact on the relationship. The use of video-conferencing or tele-presence allows high quality meetings to take place without the need to leave the office. If "virtual meetings" are presented as part of a strategic approach to reducing business impacts, the reaction can often be positive. Altering the mode of travel can also help; if several people are attending the meeting car-sharing is a possibility. Where company vehicles are provided, an emissions limit is a good way to ensure that they are as fuel efficient as possible. Often, public transport can be an alternative - and it's possible to do productive work while travelling by train, which is impossible when driving. Policy can be established via a company travel plan that makes it clear how to choose the appropriate mode of transport for different cases. Cycling can also be promoted for more local business travel, and supported by pool bikes or cycle hire schemes.

Travel to and from work: Businesses have less direct influence over how employees travel to and from their workplace, but it's still possible to encourage behaviour change. While the local authority can provide the facilities for low-carbon and active travel, the business can help staff make positive choices. Businesses can help by incentivising active travel, subsidising public transport and the purchase of bicycles, and taking part in national, regional and local events that promote active or low-carbon travel. Where travel by car is unavoidable, car sharing clubs and priority parking spaces for car sharers can be considered. Active travel can also have a business benefit in terms of improved fitness for work.

PURCHASING, SUPPLY AND CONSUMPTION

INTRODUCTION

Even though ‘sustainability’ remains a fairly abstract and remote concept for many people, the purchasing, supply and consumption (PSC) of goods plays an integral part in everyday life for all of us. The purchasing, supply and consumption of goods effects climate change in a variety of ways, both directly through the emissions of greenhouse gases from the manufacture and transport of goods, and more indirectly by affecting the resilience of the town to a changing climate by boosting local supply of products and services and the ‘green economy’ (see the ‘Community’ chapter for more on community resilience and the ‘Education, Communication and Influencing Behaviour’ chapter for more on the ‘green economy’).

If we are to meet the challenging targets set out in this strategy, all sectors of Reading’s community will need to adopt more sustainable PSC practices and behaviour. This means basing our choice and use of goods and services on maximising benefits to the environment, the economy and society, for both ourselves and the wider community, rather than on a purely private cost-benefit analysis.

As we start to understand the impact that our purchases have on the local and global environment, we will be more inclined to make choices that offer wider benefits, and accordingly, the market will respond by offering products that match these preferences.

Our consumption of products and food and our business activities all produce waste, which impacts on climate change in numerous ways. Zero waste is the process of utilising all of our waste as a resource for other purposes, thus avoiding land-fill and improving resource efficiency.

VISION FOR 2020

By 2020 people and organisations in Reading will understand the need for action on climate change and adjust their purchasing, supply and consumption choices accordingly, both individually and collectively.

A substantial number of Reading residents and local communities will have made real change to their PSC behaviour, with the results accurately recorded through proven, credible carbon measurement and monitoring techniques.

The majority of large (public and private) organisations based in the Reading area, plus a significant number of local small and medium sized enterprises (SMEs) and other small organisations, will have detailed understanding of sustainable purchasing, supply and consumption principles; they will have formal practice and procedures embedded into their activities, including proven, accurate recording of performance.

By 2020, Reading will have significantly reduced its waste going to landfill, through producing less waste, creating a market in the recycling and re-use of products, and by generating energy from waste. Surplus material will be viewed as a resource for others to use rather than categorised as waste.

SUMMARY OF STRATEGIC PRIORITIES

- *Enable people to make sustainable purchasing choices*
- *Support and encourage local purchasing and the development of local supply chains*
- *Promote and encourage new business models focused around services, rather than individual products*
- *Build a consensus on standards and commitment to sustainable procurement in both the public and private sectors*
- *Increase recycling rates*
- *Reduce waste by supporting the re-use and repair of products and materials*

HOW WE WILL ACHIEVE THE VISION

WIDER COMMUNITY

Consumers do not always have a good understanding of how their choices can help to combat climate change and there remains a major communication challenge in increasing people's awareness of how to be sustainable consumers.

Whilst there is a variety of different labels and marks, and accreditation, performance and certification schemes already running, few of these give a direct measure of a product's impact on climate change. Given the wide range of factors that consumers

consider when making purchases, it is questionable whether a system of accreditation specifically for climate change would be effective.

However, technology and process innovations will provide opportunities for consumers to invest with confidence in products offering greater efficiency savings, greater use of renewable resources, and will provide more clarity on product performance and resource use.

The provision of information, education, and skills to support people to make informed and responsible purchasing and consumption choices is crucial e.g. providing real-time feedback on the effect of behaviour on energy consumption via smart meters. *(see also Education, Communication and Influencing Behaviour chapter)*

Community networks could be used to spread messages about purchasing and consumption standards, as well as the benefits of sharing equipment, and supporting local businesses to establish resource-efficient services *(see the Community chapter for more on community activity and community resilience)*.

Strategic priority:

- **Enable people to make sustainable purchasing choices**

BUSINESS SECTOR

A survey by the Carbon Trust and the Guardian Newspaper (2012) found that 46% for businesses plan to make "tangible investments" in carbon reduction during 2012 (with 58% of public sector agencies and 33% for the voluntary sector). The bigger an organisation's energy and resource consumption, and corresponding carbon footprint, the bigger the potential savings, therefore it is the large corporate organisations who tend to invest in longer term savings. They also tend to be driven by more formalised corporate social responsibility (CSR) policies, market pressures, and cost-benefit planning, so that energy and resource saving and carbon reduction is already a priority for many of them.

However, for the vast majority of small and medium sized enterprises (SMEs), struggling in very difficult economic times, short term financial imperatives prevail and many lack the skills, expertise and resource to be able to take advantage of low carbon opportunities such as building retrofitting, renewable energy installation, etc. Lacking reliable, proven evidence (or simply knowledge) that resource saving and carbon reduction investments will provide short term benefits means many will not be inclined to take action.

This attitude may limit short term capital measures but there is still much that can be done in terms of changing behaviour, with simple energy and resource saving measures involving all staff, which can bring swift, tangible benefits. Getting employees involved

with a well planned, joined up and clearly communicated action plan is key to progress in the wider SME sector. Businesses need to guide staff to use resources wisely, offer advice on best practice and consider incentives for responsible resource purchasing and use. Once these practices are embedded into the culture of the business, larger steps are more likely to follow.

Businesses also need to be encouraged to consider new business models that generate revenue in more resource-efficient ways, as well as offering customers wider benefits than simply lowest price, and advising them how to use products wisely and manage end of life impacts, i.e. use less energy and recycle more waste.

Local supply chains

Purchasing and procurement managers can strongly influence the low carbon and sustainability practices of suppliers, and major supply chain leaders can have a significant impact on whole supply chains. Procurement procedures and practices should reflect this.

Continuing overriding emphasis on first cost/price impacts small businesses that are out-priced by larger organisations offering lower costs. Major contractors continue to dominate large scale refurbishment works and will not easily accommodate local SMEs into their supply chains and there is a lack of strong local supply chain networks to effectively compete generally with “big business”.

Central Government’s local economic growth White Paper identifies green, low carbon economic growth as a sector of national importance and in particular cites the need to stimulate UK-based local supply chains “in developing green markets where there are significant opportunities, but information barriers exist”.

One example of progress in this area is ‘RE Start Local’, an EU funded project operating in the Reading area and across SE region, which aims to increase and improve local procurement and build capacity of local SMEs in renewables and low carbon supplies and services (see ‘Education, Communication and Influencing Behaviour’ chapter for more on the ‘green economy’).

Circular economy

While many businesses are gradually accepting the need to reduce their direct energy and resource consumption and carbon emissions (operational carbon), the additional challenge of limiting the total carbon emissions created throughout the product’s life cycle (embodied carbon) is less well understood or considered.

The concept known as the ‘circular economy’¹² encourages more efficient use of and greater reuse and recycling of materials through the economy, as opposed to the

¹² <http://www.ellenmacarthurfoundation.org/>

conventional approach of 'take/make/waste'. With this new approach, 'end of life' products become a source of materials for new products - thus the name 'circular economy'. The approach promotes optimum resource use and minimum waste, while creating greater economic competitiveness and a greater localisation of economic activity.

The producer aims to "design out" waste, so that all resources are reused, and man-made materials that are not bio-degradable are designed from the outset to be reusable in the development new products.

The circular economy also aims to change the relationship between producer and consumer by encouraging the lease, rent or sharing of durable products, rather than the sale of lowest cost, disposable products. Where products are bought, there are incentives in place to encourage end of life return and reuse. (*see the 'Community' chapter for more on a 'shared economy'*)

From a business perspective this approach offers the opportunity to create new customer value and appeal, ultimately resulting in local wealth creation and employment as well as conserving resources and reducing carbon emissions.

Strategic priorities:

- ***Support and encourage local purchasing and the development of local supply chains***
- ***Promote and encourage new business models focused around services, rather than individual products***

PUBLIC SECTOR

The Government and the public sector generally have a crucial role to play in leading on the low carbon agenda, both in terms of cutting emissions from the public sector's own estate and operations, as well as creating the incentives and environment to encourage more of the private sector to participate.

The potential for increasing demand for sustainable products and services through public procurement is huge, with public authorities across Europe spending almost €2000 billion, or 16% of GDP, on goods and services annually. There is a wealth of information and advice on sustainable procurement for the public sector available, including NHS "Procurement for Carbon Reduction" and the Department for Environment, Food and Rural Affairs' National Sustainable Public Procurement Programme, offering free training opportunities to public sector procurers.

Through the Social Value Act 2012, all public authorities are required to factor in social value as part of the commissioning process, considering how the services they

commission and procure might improve the economic, social and environmental well-being of the area. This involves looking beyond the price of each individual contract to what the collective benefit to a community might be. By introducing requirements for environmental sustainability into tender specifications, the demand from public authorities could significantly increase the market for green products and drive technological innovation, as well as increasing local supply.

Purchasing and procurement managers can strongly influence the low carbon and general sustainability practices of suppliers. Although the general level of innovation and supply of low carbon goods and services is relatively slow, and as yet both public and private procurers find it difficult to identify those suppliers offering true sustainability and value for money, opportunities exist to test innovative ideas e.g. Forward Commitment Procurement, which will open up and stimulate greater focus on sustainable purchasing and supply. Public authorities (and increasingly large private sector) will increasingly group together and enforce higher sustainability standards.

Strategic priority:

- ***Build a consensus on standards and commitment to sustainable procurement in both the public and private sectors.***

RE-USE AND RECYCLING OF WASTE

The production of waste impacts on climate change in numerous ways: the disposal of materials leads to the use of raw materials for replacement products; the decomposition of waste releases greenhouse gases directly; the transportation of waste and raw materials uses energy.

To achieve zero waste, it is necessary to establish markets based on the inherent value of waste. As well as continued focus on moving towards zero waste in the municipal (household collection) waste stream, specific focus is also needed on commercial waste streams, including construction and food waste. Obtaining energy from waste that has no other value is also a priority.

The 'waste hierarchy' is to reduce waste if at all possible, then to re-use, recycle and recover energy from waste. Almost all 'product types' could potentially feature products made entirely or partly from recyclable raw materials.

Re-use

Repairing and servicing of products to extend their life reduces the total number of products manufactured and thereby the amount of associated pollution and waste. Products can be re-used by supporting second ownership e.g. second hand shops (including charity shops) and services that repair and re-condition products for re-sale.

Markets can be created for material re-distribution. The re3 partnership (Reading, Wokingham and Bracknell Borough Councils) have joined together in supporting Sue Ryder, the national charity for people with life-changing illness, via the two local Household Waste Recycling Centres for this purpose. Staff identify items with a re-use value and, perhaps following some refurbishment, the items are then re-sold by Sue Ryder in their local shops. Construction sites often dispose of excess products, such as wood, aggregate and building materials in a similar way.

Products that have no further use for their designed function can often be re-engineered for lower grade uses. Artisans and craftsmen can utilise waste products using skilled processes to create further objects. Reading's 'scrap store' has been set up specifically to help with this.

Recycling

If re-use is not possible then recycling is a good way of re-using the raw materials in products and of diverting waste from landfill sites. Many businesses choose to recycle their trade waste and this service is provided by the market. Recycling has become a mainstream activity for most people but the Council will continue to seek ways to improve the effectiveness of their collections.

Reading's current recycling rate is 36%; the Council is looking to increase this to 42% by maximising waste prevention, improving our waste collection services and encouraging waste prevention. In addition, implementing an initiative to improve recycling in flats and introduce a recycling incentive scheme using funding from the DCLG (Department, Communities & Local Government) Weekly Collection Support Scheme should be of benefit.

Strategic priorities:

- ***Reduce waste by supporting the re-use and repair of products and materials.***
- ***Increase recycling rates***

A BUSINESS PERSPECTIVE

This is where business plays its most significant role in helping to build a more sustainable future. Its influence here is enormous and the whole of this chapter is therefore relevant to businesses.

Business fuels consumerism by producing goods and services and promoting them to customers. The choices made in how those products and services are made, delivered, used and disposed of are almost entirely within the control of the business and so, it follows, are their environmental impacts. Equally, businesses are also consumers of the

goods and services they use need in order to operate. Both directly and indirectly, businesses influence 100% of the manufacturing impacts that account for 48.5% of carbon emissions.

Most of the work done up until now by the business sector to mitigate carbon emissions has been incremental, however to embrace concepts such as the ‘circular economy’ and the ‘sharing economy’ requires more disruptive innovation. For businesses that are prepared to be bold, there is an opportunity to introduce innovative business models, develop new revenue streams and create brand new market sectors. We can already see examples of this, for example the peer-to peer rental business model of Zipcar and the advent of “cloud” computing. As a result of these trends, businesses find they have to react to new and unexpected competitors. Taking a proactive approach to business model disruption offers prime-mover advantage, so that a company can compete from a position of strength.

EDUCATION, COMMUNICATION AND INFLUENCING BEHAVIOUR

INTRODUCTION

Climate change affects everyone and everyone is able to play a part in helping to tackle it. By thinking about how we live, work and play, and by making simple changes to our behaviours to reduce energy consumption, we can all be part of the solution.

Meeting Reading's targets for minimising the effects of climate change will depend on significant long-term changes in the behaviours of individuals, communities, businesses and the public sector across the borough.

How we behave is determined by many factors, such as our habits, beliefs about how we should behave in a given context (social norms), and cultural expectations, as well as by incentives. Although changing our behaviour and habits can sometimes feel challenging and complex, changing society's social norms can lead to positive outcomes. This can be demonstrated through the popular growth of initiatives such as fair trade and recycling. These initiatives have developed through the communication of consistent and clear information.

Our priorities can also be influenced by issues that immediately affect us, such as our finances, health and available time. Perhaps even more importantly, these factors contribute to how we see ourselves in society and to the values which we feel are important to us, which in turn can have an impact on our behaviours.

If Reading is to have more renewable energy installations and if its residents are to adopt more energy efficiency measures, Reading's workers will need to up-skill in a variety of technical and specialist areas, particularly in the building trade, to enable the development of a 'green economy' - from plumbers and builders to architects and chartered surveyors.

This chapter aims to set out how education, communication and influencing behaviour can lead to action on climate change, and identifies some key target audiences.

VISION

People and organisations in Reading will understand the reasons for action on climate change; we will be aware of what we can collectively achieve and the contribution we can make.

People of all ages will be equipped with knowledge and skills that will increase employment accessibility within the local 'green economy'.

SUMMARY OF STRATEGIC PRIORITIES

- *Further integrate sustainable behaviour promotion and practice throughout schools, colleges and universities, and workplaces*
- *Ensure that communication which is aimed at influencing climate change related behaviour is delivered in a consistent and targeted way.*
- *Engage organisations in the private sector, including residential and commercial landlords, in effective action to reduce carbon emissions*
- *Develop the market for climate change related local business and the skills to ensure that local jobs are created in line with the growing low carbon economy*

HOW WE WILL ACHIEVE THE VISION

Research shows that understanding and awareness alone do not always motivate us to change our behaviour. Concerns about the environment do not necessarily translate into action. Equally, what people say they do is not always what they do in practice. Common behaviour can sometimes prove difficult to change, and unsustainable behaviours can be regarded as 'normal'. Appeals to change behaviour in one area e.g. energy saving on the grounds of financial benefit, may simply divert resources into another 'unsustainable' but normal activity e.g. flying on holiday. Therefore it is important to understand more fully what influences people to change their behaviour and why some people are willing to make certain behaviour changes, but not others.

However, sustainable living can become the social norm. A coherent range of interventions will be needed over both the long and short term to encourage behaviour change - no single policy or intervention is likely to achieve change on its own. The increase in waste recycling shows how, with the right information and at the right scale,

social norms can be altered.

EDUCATION

Knowledge and understanding are fundamental to behaviour change, although not always sufficient in themselves for long-term behaviour change. Structured education and training have a role to play in both improving understanding and raising skills levels in sustainable services and industry.

Certain key life stages, such as childhood and young adulthood, can present ideal opportunities for influencing attitudes and behaviour. Reading's various educational institutions already contribute to educating people about climate change. The University of Reading, New Directions (the council's adult learning provider), Reading College and many of the borough's schools have established green teams, pressure groups, eco-schools groups or the equivalent, where students encourage their peers and staff to change their behaviour.

In addition there are a number of education programmes such as the Institute of Education's 'Changing with the Climate' and Reading International Solidarity Centre's 'Global Advocates' course, which are available for teachers and students. New Directions has also developed an online course 'EcoAdvantage' to enable adult learners to develop sustainable skills.

Despite the wealth of current provision, this strategy recognises the opportunity to develop this further, focusing in particular on the knowledge and understanding of children and young people.

Strategic priorities:

- ***Further integrate sustainable behaviour promotion and practice throughout schools, colleges and universities***

COMMUNICATION

Even if the broad causes of climate change are understood and accepted, it is not clear that people and organisations always understand how the things they do and the choices they make, either individually or corporately, contribute to the root cause of man-made climate change.

Information alone is unlikely to change people's behaviour and short term information campaigns in particular are rarely sufficient. However when used alongside other measures, good communications can be crucial to influencing people's thinking and supporting behaviour change. Techniques such as positive framing, i.e. emphasising the benefits of a low carbon future and changes in lifestyles, have been known to encourage

positive responses. Our challenge is to develop appropriate, long-term information campaigns across partner organisations and beyond.

As well as the content of the message, we are also affected by *who* communicates information to us, whether it be our workplace, university, school, family or friends, and *how* they communicate it, whether we hear it through the internet, newspaper, radio, television or word of mouth.

It is therefore important that we understand the audience we are seeking to influence so that we know what type of message and what channel of communication will have the most effect. We need to target messages so that every individual can fully understand the ways in which they can contribute to minimising the impacts of climate change. These channels will include formal education opportunities delivered through schools, colleges, further education and work based training (see 'Education' above), as well as informal awareness raising achieved through the media, the work of charities and community centres within the borough.

Where possible, we will use communications networks which are already in place (e.g. newsletters, business networks and voluntary sector networks) to engage with a wide variety of audiences on climate related issues, and we will need to be sure that we are co-ordinating messages, language, tone and voice to maximise the impact on the target audience.

Our key messages will need to reach the widest possible span of the local community, as well as being targeted at specific groups and audiences.

Our key communication aims with respect to climate change are to:

- Ensure that people who live in, work in and visit Reading are aware of any new initiatives, projects they can join in with or benefit from and contribute to a.
- Demonstrate Reading as serious about climate change and includes the opportunities it presents for external investors and companies looking to move to Reading.
- Encourage individuals, businesses and organisations to consider climate change as part of their everyday activities and operate and behave in ways that support the objectives of the Climate Change Strategy.

Strategic priority:

- ***Ensure that communication which is aimed at influencing climate change related behaviour is delivered in a consistent and targeted way.***

Developing 'influencing behaviour' programmes

Reading Climate Change Partnership has established an 'influencing behaviour' sub-group, which has started to draw on the expertise of partner organisations, particularly

University of Reading, in the science of behaviour change and how this can be applied to communications and programmes that seek to influence climate change related behaviour. Our aim is to use and extend the work of this group to ensure that all relevant communications and programmes of action, across all themes of this strategy, are as informed and effective as possible.

In order to measure the effectiveness of our communications, we will need to consider establishing a process and mechanism for measuring changes in the levels of knowledge, understanding, motivation and commitment to changing behaviour across different audiences in Reading.

KEY TARGET AUDIENCES

As mentioned, it will be important to ensure that we understand the audiences we are seeking to influence, in particular how they receive information and what/who is likely to influence their thinking.

Business

Business is one of the key contributors of green-house gas emissions, responsible for 48.5% of Reading's green-house gas emissions and is therefore a key focus for Reading Means Business on Climate Change.

There is some legislation around reporting emissions for larger businesses but little incentive other than cost savings for smaller businesses to change their practices. In a small area like Reading borough, there will be opportunities for businesses to work together and realise both emissions and cost savings by sharing resources, best practice and joint working on procurement (*see the Purchasing, Supply and Consumption chapter for more on the private sector*).

Landlords

Residential as well commercial buildings in the private sector are significant contributors to green house gas emissions, and Reading has both a relatively large private rented sector and a relatively young and transient population. This, alongside the funding available for energy efficiency measures through the Energy Companies Obligation and the Green Deal, makes private sector landlords a key target audience. An added benefit to making homes more energy efficient is the consequent reduction in 'fuel poverty' for those who struggle to heat their homes (*see the chapter on 'Low Carbon Development' for more on the Green Deal and 'fuel poverty'*).

As well as targeting private sector landlords, communication messages will need to address, engage with more transient groups who may have different perceptions of their long-term investment in the town or their local community to the general population.

Strategic priority:

- ***Engage organisations in the private sector, including residential and commercial landlords, in effective action to reduce carbon emissions***

GREEN SKILLS

The 'Green Economy' stimulates the creation of jobs that will mitigate and help us adapt to climate change, as well as help us manage our waste. This market has grown significantly during the current recession nationally is set to grow further.

As communities become more aware of the effects of climate change, there will be increased demand for electric vehicles, renewable energy, and insulated homes. The Green Deal will provide opportunities for greater uptake of energy efficiency and renewable energy technologies, and RCCP will have a role in ensuring that this is taken up locally.

The development and implementation of these initiatives and new technologies will require training for the current and future workforce. Whether this is in the maintenance of electric vehicles, design of 'zero carbon' buildings or the ability to install ground source heat pumps, there needs to be access to high quality training at affordable prices. Training opportunities, whether delivered by specialist bodies, manufacturers, local training providers or government sponsored programmes, will need to be effectively signposted.

Strategic priority:

- ***Develop the market for climate change related local business and the skills to ensure that local jobs are created in line with the growing low carbon economy***

A BUSINESS PERSPECTIVE

Business is able to influence the behaviour of both its staff and its customers, and the power of brands should not be underestimated. To a greater or lesser extent, people see their brand choices as a reflection of their own values and this gives brand owners enormous power to shape behaviour. By reducing the environmental impacts of their products and services, and by communicating those changes to customers, companies can help to "normalise" environmentally sustainable choices. They can also help their customers to use those products or services in a more sustainable way, thereby amplifying the business's own mitigation activities.

This power carries with it responsibility. Claims must be authentic, transparent and

substantiated by hard data, or trust will be broken and the company's reputation damaged. There is 'green claims' guidance on the Department for Environment, Food and Rural Affairs' website which provides a solid basis for communicating environmental attributes and benefits. Independent accreditation is a useful way of proving the validity of claims, too.

Unless your product or service is specifically designed for eco-consumers, it's probably unrealistic to expect your customers to buy it for altruistic reasons. Some of the most effective environmental communications campaigns are where the benefit to the consumer is clearly articulated as well as the environmental gain - for example the Unilever "turn to 30" campaign which quantified the cost saving of washing at lower temperatures.

Reducing your company's carbon emissions relies as much on the behaviour of your staff as it does on the equipment you buy or the processes you set up. Employee engagement can be challenging and behaviour change is notoriously difficult to achieve. There are no magic bullets but you should expect to have to repeat key messages periodically and to be clear about the benefits to the business of the changes you expect staff to make. Competitions can help to harness peer pressure, and incentive programmes can be very effective; they need not be costly and for activities like energy saving they can be funded from the savings achieved.

Convincing staff to adopt more carbon-efficient ways of working is more effective if it aligns with the culture and values of the business. The more consistently the company lives its values, the more likely it is that the desired behaviours will become instinctive. Helping staff to reduce their carbon emissions at home can be a useful way of engaging them to do the same at work. The benefits they experience in terms of reduced energy bills, for example, can help make the business benefits more tangible and increase motivation. They may even become advocates for the cause, and help get their colleagues on-board.

COMMUNITY

INTRODUCTION

Communities can play a central role in developing a more sustainable way of life that reduces the impact that our lifestyles have on the global climate. This can be achieved through individuals being more self sufficient, coming together as a community to share resources, and through a strong local business community.

Whilst Reading's action to reduce its impact on climate change will be the sum of all the changes made by each individual, business or other organisations, this can be significantly enhanced through collective community action at a local level. Working with Reading's existing strong community sector, including a number of environmental groups, will benefit local action taken on climate change.

To reduce our ecological impact, prepare for unavoidable climate change and build high quality low-carbon lifestyles, we will need to consider our interpretation of 'success' to include factors relating to our overall quality of life.

Our quality of life (see vision below) is dependent on much more than increasing our material wealth, as currently dominates our GDP and defines how successful we are as a nation. The significance given to economic growth should be balanced with other factors which affect our well-being, such as protecting, enhancing and recognising the contribution of our local environment and our social interactions . To this effect, we should be working towards building sustainable communities.

This chapter sets out how collective action at the community level can help to reduce the effects of climate change and can help people to adapt to a changing climate, whilst improving communities' quality of life by helping everyone to lead their lives in a more sustainable way.

VISION FOR 2020

By 2020, people will have an understanding of how their local environment contributes towards a better quality of life; they will have the commitment and community capacity to support each other to lead more sustainable lives. Reading's neighbourhoods will be places where success is measured by the uptake of life-styles centred on self-sufficiency, sustainable consumption and sharing of resources.

Quality of life will include not only wealth and employment, but will also consider physical and mental health, education, recreation and leisure time, as well as the effects of the built and natural environment on their well being, and the social belonging they feel.

SUMMARY OF STRATEGIC PRIORITIES

- *Building community activity relating to sustainable communities*
- *Build community resilience and self sufficiency (collective and individual) to climate change.*
- *Reduce consumption by building a sharing economy*
- *Build an alternative economy focused on quality of life and emphasising sustainable communities*

HOW THE VISION WILL BE ACHIEVED

BUILDING COMMUNITY ACTIVITY

Reading has a well-developed and growing volunteering base and culture, with at least 725 voluntary and community groups across Reading¹³. Although these groups make up the community and voluntary sector and may be seen as ‘one body’, they actually deliver a range of services in differing ways to engage a diverse variety of people.

These voluntary and community groups can play a key role in both promoting knowledge and understanding of climate change and in developing more generally sustainable lifestyles across Reading.

Valuing the contribution of these groups and engaging them in climate change related campaigns will help move us towards the vision set out in Reading Means Business on Climate Change. Reaching these groups in a creative and effective way will help us to encourage people to adopt low carbon life styles.

A sustainable community is one where everyone is equally able to meet their own needs and improve their quality of life without harming the environment or animals, depleting natural resources or putting any part of society at a disadvantage.

¹³ registered with Reading Voluntary Action

Neighbourhoods

Strong neighbourhoods are an important aspect of a sustainable community. Having influence over and being involved in our local physical environment and building local social networks are important to both our quality of life and low carbon living. A focus on a geographical location is an important method of engagement. People often relate to the area where they live, socialise or work.

Engaging neighbourhoods on climate change issues can be done in a variety of ways. For example, renewable energy projects often attract attention through the opportunity to be part of an 'ethical' and beneficial shared investment or the growing of food can engage people who like being outdoors. Involvement with a city farm or community allotment can help build a connection with the natural environment, which may lead to a change in values, and subsequently action that will help reduce the effects of climate change.

Community organisations and networks

There are a number of organisations and cross community based networks working on building local community action to tackle the impact of and resilience to climate change, and to pursue the wider aim of building sustainable communities. Currently, the most prominent networks include Econet, Greater Reading Environmental Network, Transition Town Reading, Go Local On a Better Environment (GLOBE) groups and Reading Christian Ecology Link. Other significant local organisations include True Food Community Cooperative, and Reading International Solidarity Centre (RISC), both of which trade and generate income which re-invested in their activities.

These groups demonstrate what collective community action can achieve, eg a solar panel bulk buying scheme. Sustaining and building on this activity by increasing their capacity and co-ordination will help to further strengthen their contribution to a sustainable community. This will in turn encourage and empower grass roots groups to take action to help shape sustainable local communities because their input is more explicitly valued and they can see how they contribute to local policy and action.

In addition, these groups can provide a different perspective to that held by larger organisations as they are closer to the communities involved and can act as a 'sounding board'. Therefore increasing their links with RCCP, Climate Berkshire and other influential bodies, will be beneficial to the work of these partnerships

In essence, we can achieve much more together. The knowledge, skills and

¹⁴ <http://www.ellenmacarthurfoundation.org/circular-economy/circular-economy>

experience within each of the business, community and public sectors is unique but can be benefit to the other sectors and to delivering the overall aims of this strategy.

Strategic priority:

- **Build community activity relating to sustainable communities.**

BUILDING COMMUNITY RESILIENCE

Local renewable energy production and food growing contribute to our vision of a sustainable community through increasing self-sufficiency, and removing reliance on energy and food brought in from a distance, at a financial and environmental cost. With international supply chains at the mercy of volatile weather, a local supply can be more reliable and increase a community's resilience to climate change (*see the chapter on 'Purchasing, Supply and Consumption' for more on local purchasing and supply chains*).

A good example of low carbon living and an ideal way for an organisation to become more self-sufficient and to fund its work, would be a community and charity sector that operates from energy efficient buildings, generates renewable energy, grows its own food and sells its waste resources, thereby saving money and /or earning an income.

Resilience for all

A sense of a community 'pulling together in tough times' (e.g. unfavourable economic conditions) is also an important aspect of a sustainable and resilient community and is something we wish to build. To this effect, making sure everyone is becoming more resilient and not just the most able or knowledgeable, is an important aspect of a sustainable community. Everyone should be progressing and sharing in its success. Resources and effort will be needed to make sure everyone in our community is given opportunities to improve their quality of life, and challenge limiting factors like poor financial or residential circumstances as well as social barriers.

Local food production

Creating shared allotments and supporting more people to grow their own food is an important way of becoming more self-sufficient, with additional benefits of reducing the carbon footprint of a product if it enters the local food supply chain.

Currently community leaders in this market include the True Food Co-op and the Farmers' Market. The Food 4 Families project creates opportunities for communities to grow food and hosts a bi-annual 'Town Meal' promoting the benefits of growing and sharing locally grown food. Initiatives like this will help raise awareness and confidence amongst residents and organisations to purchase locally through local

networks and trading groups.

The Council has an Allotment Strategy which sets out the provision of space for its residents for growing food. In addition, they have been supportive of community schemes to create orchards and fruit hedges. The community sector also provides space for food growing and uses it as a mechanism to empower local people.

These initiatives will also promote greater availability of local food and other resource supplies. More reliable supply chains are needed to develop this market and make locally grown food more accessible and affordable.

Local renewable energy production

An important way to become self-sufficient is for communities to take control of their energy use, and take advantage of the potential to install renewable energy which will benefit them both financially and environmentally for years to come.

Collectively, there are a number of ways the community sector can benefit from renewable energy generation and schemes offering financial incentives. Reading has seen some activity in this area through a community bulk buying scheme and the installation of renewable energy systems within community centres, but more can be done.

There are a number of ambitious schemes nationally that demonstrate what a community group can achieve through installing a community renewable energy system. This may be possible in Reading, where community assets and determination are aligned to achieve such a goal.

Strategic priority:

- ***Build community resilience and self sufficiency (collective and individual) to climate change.***

A SHARING ECONOMY

The consumption of goods contributes significantly to the total carbon released internationally. Carbon emissions and environmental destruction result from the extraction raw materials, as well as from the manufacture of the goods and from their transportation.

Plastic, cardboard and polystyrene all commonly used for packaging and presenting goods, and to keep them in perfect condition. This has raised consumers' expectations of having only new and pristine goods, and has significantly increased the amount of waste from packaging.

The 'circular economy'¹⁴ concept (see also the chapter on 'Purchasing, Supply and Consumption') considers the 'end of life' of goods from a business perspective. This approach defines all goods at the end of their life not as waste, but as materials for the production of further goods.

Sustainable communities have a related role to play in the reduction of waste by helping to develop an economy based on sharing. This reduces the need for new goods and therefore reduces the impact of manufacturing goods.

A sharing economy is an economy measured by social interactions and exchanges of goods, with a culture of 'access not ownership'. Trust will be key to these exchanges and time and effort needs to be invested to build this between individuals and organisations. Changing the negative perceptions that the majority of the population hold about second hand goods will also be a challenge.

There are existing re-use and service exchange schemes (Freegle and Reading LETS), that we can start to build on. A repair scheme movement (repair cafés) is becoming popular and could be encouraged here. This not only provides a platform for people to have their broken possessions fixed, but also provides them with the skills to fix them.

Taking this one step further, a market for goods developed from waste materials would help to increase the richness of community skills and engender creativity, as well as reducing the amount of waste going to landfill.

Strategic priority:

- **Reduce consumption by building a 'sharing economy'**

READING AS A 'COMMUNITY' TOWN

Reading is a town with a thriving economy, attracting international business headquarters, due to its excellent transport links and closeness to London. The consequent supply of jobs pulls 30,000 people into Reading everyday, rendering Reading a 'commuter town'. It has also become a sub-regional shopping centre hosting many 'chain stores' similar to other towns in the country, drawing attention away from Reading's unique character.

These businesses and jobs are vital to the survival of Reading's community. However, the 'corporate image' Reading has gained as a consequence of its thriving economy perhaps eclipses the thriving community sector. This gives the impression that Reading life is centred on prosperity alone, which in turn attracts businesses and residents who hold similar values, possibly leading to a lack of social investment, the effects of which may then be seen in both the physical environment and community life.

To build sustainable communities, we need to rebalance Reading's image, moving away from a focus on financial prosperity, towards a focus on community well-being and ultimately promoting a new way of measuring success. This will help build a Reading that has a more diverse local business community that contributes to a local identity and a thriving local community. This in turn will attract more people to Reading who want to see it thrive and improve.

Reading's *alternative economy* could mirror efforts undertaken by cities who have strong environmental movements and a strong local identity, known for their culture and their richness of life.

New ways of measuring success and progression are being developed, which consider social, environmental and quality of life factors, alongside the more traditional measures of national growth which do not always benefit all sectors of society.

Local business and trading charities

Building a local diverse business community where innovative small business and social enterprises are supported, will help us meet these aims. Local businesses are more likely to support community activity and invest in their local areas. Keeping 'money local' and encouraging businesses to reinvest in the communities in which they are located is a significant element of building a sustainable community.

There are a variety of charities that have a trading arm to enable them to survive and meet their aims. The most visible examples of these are charity shops selling second hand goods. The aim is not only to raise funds for the work of the charity but to support a movement that reduces carbon by reusing goods. One example in Reading is RISC (Reading International Solidarity Centre) which promotes the 'Global Schools' programme and 'Fair Trade' movement. These call for greater awareness of sustainable communities internationally, as well as other ethical causes including climate change. The further development of these organisations is key to taking forward our alternative economy.

Strategic priority:

- ***Build an 'alternative economy' focused on quality of life and emphasising sustainable communities.***

Whether or not they choose to play an active part, businesses are part of the community. Simply by providing employment for local people, businesses can support their local economy. They can increase that contribution by hiring locally where possible and by resisting the temptation to offshore jobs. Sourcing products and services from local businesses is also beneficial to the community as a whole, both economically and in terms of reducing transport impacts.

Employers have the opportunity to improve the quality of life of their employees, both in the workplace and outside. Initiatives that support personal development, healthy living and flexible working can reduce sickness absence as well as improving productivity, morale and staff retention. A staff volunteering scheme can be a good way of providing practical support for local climate change and biodiversity projects that also provides opportunities for teambuilding.

The most progressive companies look beyond their direct stakeholders and engage with the wider community, either through their own activities to promote emissions reduction or by funding or providing in-kind support for other initiatives. Even small businesses can do this, and it need not be a massive drain on resources if it is kept relevant and scalable. In a company where environmental and social impacts are valued equally to financial results, being a positive influence on the local community can become second nature.

READING CLIMATE CHANGE STRATEGY 2013-2020

STRATEGIC PRIORITIES, JUNE 2013

| |
|---|
| ENERGY |
| <ul style="list-style-type: none">● <i>Reduce electricity consumption within the commercial and public sectors</i>● <i>Introduce smart meters and energy storage solutions in Reading</i>● <i>Increase amount of energy generated locally using renewable technologies.</i>● <i>Develop heat supply networks to deliver low carbon heat in Reading.</i> |
| LOW CARBON DEVELOPMENT |
| <ul style="list-style-type: none">● <i>Buildings in Reading to be built to high standards of energy efficiency (i.e. zero carbon standards), incorporating on-site renewable energy where possible¹</i>● <i>Retrofit energy efficiency measures into Reading buildings</i>● <i>Improve properties to reduce fuel poverty in Reading</i>● <i>Enable the uptake of Green Deal and associated grants in Reading.</i>● <i>Minimise the ‘embodied carbon’ incorporated into construction projects</i>● <i>Continue to develop planning policies that:</i><ul style="list-style-type: none">➢ <i>support the reduction of green house gas emissions directly and indirectly from the borough.</i>➢ <i>reduce the risks of inevitable climate change to the communities of Reading.</i> |
| NATURAL ENVIRONMENT |
| <ul style="list-style-type: none">● <i>Protect wildlife from impacts of climate change</i>● <i>Encourage local community groups and businesses to become more involved in the management of local green spaces</i> |
| WATER SUPPLY AND FLOODING |
| <ul style="list-style-type: none">● <i>Manage supply of and demand for water to reduce the expected impact of</i> |

¹ SP wording to be agreed at Reading Climate Change Partnership Board on 10th July

water shortages on consumers and on wildlife

- *Reduce the carbon footprint of water supply and water heating*
- *Reduce the risk of damage due to flooding*

TRANSPORT

- *Develop a transport infrastructure which supports more low carbon travel options for people in Reading*
- *Reduce energy use and embodied energy in transport infrastructure*
- *Encourage a step change to non-car travel from all sectors of the population through targeted advice, incentives and enforcement*
- *Manage transport infrastructure and services to prepare for climate change*
- *Reduce the air pollution from vehicles*

PURCHASING, CONSUMPTION AND SUPPLY

- *Enable people to make sustainable purchasing choices*
- *Support and encourage local purchasing and the development of local supply chains*
- *Promote and encourage new business models focused around services, rather than individual products*
- *Build a consensus on standards and commitment to sustainable procurement in both the public and private sectors*
- *Increase recycling rates*
- *Reduce waste by supporting the re-use and repair of products and materials*

EDUCATION, COMMUNICATION AND INFLUENCING BEHAVIOUR

- *Further integrate sustainable behaviour promotion and practice throughout schools, colleges and universities, and workplaces*
- *Ensure that communication which is aimed at influencing climate change related behaviour is delivered in a consistent and targeted way.*
- *Engage organisations in the private sector, including residential and*

commercial landlords, in effective action to reduce carbon emissions

- *Develop the market for climate change related local business and the skills to ensure that local jobs are created in line with the growing low carbon economy*

COMMUNITY

- *Building community activity relating to sustainable communities*
- *Build community resilience and self sufficiency (collective and individual) to climate change.*
- *Reduce consumption by building a sharing economy*
- *Build an alternative economy focused on quality of life and emphasising sustainable communities*

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ENVIRONMENT, CULTURE AND SPORT

| | | | |
|------------------|---|--------------|--------------------------------------|
| TO: | STRATEGIC ENVIRONMENT, PLANNING & TRANSPORT COMMITTEE | | |
| DATE: | 9 th July 2013 | AGENDA ITEM: | 9 |
| TITLE: | DRAFT REVISED S106 PLANNING OBLIGATIONS SUPPLEMENTARY PLANNING DOCUMENT | | |
| LEAD COUNCILLOR: | CLLR TONY PAGE | PORTFOLIO: | REGENERATION, TRANSPORT AND PLANNING |
| SERVICE: | PLANNING | WARDS: | ALL |
| LEAD OFFICER: | ALISON AMOAH | TEL: | 0118 9372286 |
| JOB TITLE: | PRINCIPAL PLANNER | E-MAIL: | Alison.amoah@reading.gov.uk |

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 The purpose of the report is to set out the key changes included in the Draft Revised S106 Planning Obligations Supplementary Planning Document (SPD).
- 1.2 The existing adopted guidance¹ on S106 planning obligations was published in 2004 and some of its evidence base is now viewed as relatively out-of date. The introduction of the Community Infrastructure Levy (CIL), which has been devised to replace various provisions currently being made under planning obligations, has taken priority over a review of the SPG. As part of this, Cabinet has already considered new Supplementary Planning Documents on Employment and Skills Training and Affordable Housing, which will remain outside the CIL regime. However, the Government is currently consulting on new regulations for CIL, including a proposal to extend the time for its introduction by a further 12 months. As it may remain in place up until 2015, it has been decided that the existing S106 guidance should be reviewed so that there is up-to-date guidance on matters that will eventually be dealt with under CIL. It is proposed to adopt a revised version of the guidance as an interim measure prior to the introduction of the Community Infrastructure Levy (CIL).
- 1.3 The main changes proposed in the revised SPD are the update of plans and costs. The primary infrastructure for which S106 will be sought is for transport, education and open space, along with other types of infrastructure in accordance with the Council's adopted Sites and Detailed Policies Document Policy DM3: Infrastructure. This sets out all the types of infrastructure, which will be sought, where relevant, and in accordance with legal tests.
- 1.4 This revised SPD will need to be read in conjunction with the Employment, Skills and Training SPD and Affordable Housing SPD.

¹ Planning Obligations under Section 106 of the Town and Country Planning Act 1990, Final Supplementary Planning Guidance (2004)

2. RECOMMENDED ACTION

- 2.1 That Committee approves the Draft Revised S106 Planning Obligations Supplementary Planning Document, as at Appendix 1, for consultation for a period of 6 weeks.
- 2.2 That Committee note that the results of the consultation will be reported back to a future Committee when approval for adoption will be sought.

3. POLICY CONTEXT

- 3.1 The Council's Supplementary Planning Guidance on Planning Obligations was adopted in 2004. It has been used effectively to secure planning obligations from developers, which have contributed towards funding a range of infrastructure within the Borough.
- 3.2 However, since its adoption there have been significant changes in terms of relevant policies and costs and recent planning appeal decisions have raised some issues with the SPG.
- 3.3 In 2010 the Community Infrastructure Levy Regulations introduced three **legal** tests to be applied when seeking planning obligations from developers. These are as follows and are also set out in paragraph 204 of the National Planning Policy Framework (NPPF), 2012:
 - Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development
- 3.4 The NPPF recognises that where safeguards are necessary to make a particular development acceptable in planning terms the development should not be approved if the measures required cannot be secured through appropriate conditions or obligations through agreements. The NPPF also sets out in paragraph 173 that it is important that the scale of obligations does not threaten the ability of a site to be developed viably.
- 3.5 Since 2004 there has also been the adoption of a number of relevant local planning policies:
 - Core Strategy (2008) Policy CS9: Infrastructure, Services, Resources and Amenities - which requires development proposals to be sustainable through the provision or re-provision of any infrastructure, services, resources or other assets affected by the development.
 - Sites and Detailed Policies Document (SDPD) Policy DM3: Infrastructure - sets out the specific infrastructure types, for which planning obligations will be sought. The Policy includes a prioritisation to be applied, for example for reasons of viability, when seeking to agree an appropriate range of measures for which planning obligations will be secured.
- 3.6 Additionally there are a number of policies within the Core Strategy, which include specific thresholds and quantified requirements for the provision of infrastructure, and policies, which include general requirements to enhance facilities, and to make new provision where appropriate. These include community infrastructure (CS32), biodiversity (CS36) and access to open space (CS30). There are also policies which require specific mitigation measures including CS20: Implementation of the Reading

Transport Strategy; CS22: Transport Assessments; CS34: Pollution and Water Resources; and CS38: Trees, Hedges and Woodland.

- 3.7 The adopted Reading Central Area Action Plan (RCAAP, 2009) and the SDPD include a number of site specific allocations which include reference to specific infrastructure which will need to be considered in bringing the site forward for redevelopment as well as specific policies such as DM16: Provision of Open Space.
- 3.8 These policies seek to ensure that development proposals make an appropriate contribution towards necessary and relevant physical and social infrastructure in order to ensure that development is both sustainable and contributes to the proper planning of an area.

4. THE PROPOSAL

a) Current Position

- 4.1 The Council currently secures developer contributions negotiated through s106 for a whole range of infrastructure projects. These comprise a mix of pooled and individual site related contributions. The receipt of S106 planning obligations has generated an average of about £3million per year over the past 10 years.
- 4.2 The current S106 SPG needs to be updated to ensure that it continues to provide a relevant basis for seeking obligations from developers.

b) Option Proposed

- 4.3 It is proposed to revise the existing S106 SPG to provide an updated basis for seeking planning obligations from developers in accordance with Policy DM3 of the Sites and Detailed Policies Document. This will serve as an interim version until a review is put in place alongside the introduction of Community Infrastructure Levy (CIL).
- 4.4 The draft updated version includes the following key changes:
 - Updated policy, plan and strategy references;
 - Specific updates to the evidence base for securing contributions towards the primary infrastructure of open space, education and transport;
 - Updated evidence base and contribution levels for open space, transport and education;
 - A revised section on other types of obligations to provide the detail to relevant adopted Sites and Detailed Policies Document policy DM3;
 - Deletion of the original sections on Affordable Housing (no. 2) and Economic Development (no. 6) as these are dealt with through separate Supplementary Planning Documents;
 - Detail with regard to the role of the S106 monitoring officer and the process of reviewing S106 legal agreements.

- 4.5 The proposed revised contribution levels indicate some slight increases and slight decreases for transport, depending on the development type, reflecting varying trip rates since 2003 when the original SPG was prepared. A small increase is proposed for leisure/open space to reflect increased costs. For education, a revised method for calculating education contributions based on 'gap' funding requirements is proposed. The existing SPG used a benchmark cost per place provided by the Department of Education. This has not been updated since 2008/9. The formula is now based on the 'gap' between the Council's cost per school place calculations and the assumed

available funding from central government and local sources including an element of borrowing. This represents a modest increase per dwelling (varying depending on dwelling type/ size) over the original figures. The overall proposed changes might affect the viability of some schemes and would therefore have some implications on the level of other obligations (e.g. affordable housing) which could be secured on a scheme.

c) **Other Options Considered**

(i) Not updating the 2004 S106 SPG

- 4.6 There will be a need to complete a review of the S106 planning obligations, alongside the introduction of the Community Infrastructure Levy. However, until that is provided, the Council could face challenges to the validity of the SPG both from developers and through the appeal process. This could not only lead to additional costs, but could affect the level of contributions secured through S106, thereby potentially undermining the Council's ability to achieve sustainable growth.

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 The introduction of a Revised S106 SPD will contribute to achieving the Council's following strategic aims, through providing funding for a range of infrastructure to support development:

- To develop Reading as a Green City with a sustainable environment and economy at the heart of the Thames Valley;
- To establish Reading as a learning City and a stimulating and rewarding place to live and visit;
- To promote equality, social inclusion and a safe and healthy environment for all.

6. COMMUNITY ENGAGEMENT AND INFORMATION

- 6.1 It is proposed to undertake public consultation for at least 6 weeks. This will involve sending out consultation letters to relevant parties on the LDF team's consultation database, including government departments, adjoining local authorities, developers and agents, other users of the planning system and local interest groups. It is also proposed to advertise the consultation via local press and the RBC website. This will be in accordance with the relevant Town and Country Planning Regulations².

7. EQUALITY IMPACT ASSESSMENT

- 7.1 The Council has had regard to the general equality duty imposed by the Equality Act 2010 (S.149). This requires public authorities, in the exercise of their functions, to have due regard to the need to eliminate discrimination, harassment and victimisation etc.; to advance equality of opportunity between people who share a relevant protected characteristic and people who do not; and to foster good relations between people who share a relevant protected characteristic and those who do not.

- 7.2 The Council has carried out an Equality Impact Assessment, and considers that the application of the Revised S106 Planning Obligations SPD will not have a direct impact

² The Town and Country Planning (Local Planning) (England) Regulations 2012.

on any groups with protected characteristics. The Scoping Assessment, included at Appendix 2, identifies that an Equality Impact Assessment (EqIA) is not relevant to the Draft Revised SPD as it will apply to all developers. There is no evidence or belief that the operation of seeking and securing S106 planning obligations will have a direct impact on any groups with protected characteristics.

8. LEGAL IMPLICATIONS

- 8.1 The framework for securing planning obligations was introduced under S106 the Town and Country Planning Act 1990. Regulation 122 (2) of the Community Infrastructure Levy Regulations introduced three legal tests to be applied when seeking planning obligations. This is reiterated in the National Planning Policy Framework.
- 8.2 The Revised S106 SPD will not take effect until it has been published in accordance with the Town and Country Planning Regulations 2012².
- 8.3 Approval is currently sought for consulting on the Draft Revised S106 Planning Obligations SPD. This is being undertaken in accordance with regulations 12 and 13 of the 2012 Regulations.

9. FINANCIAL IMPLICATIONS

- 9.1 The costs of consulting on and administering S106 will be covered by existing budgets and staff costs. The relevant costs for monitoring and legal costs can be recouped as they are included as costs within the S106 legal agreements.

Value for Money

- 9.2 The introduction of the Revised SPD will ensure that the Council maximises developer funding towards infrastructure, and on the basis that the Council has the means to recoup legal and monitoring costs, then it represents value for money.

Risk Assessment

- 9.3 There are risks associated with not revising the 2004 SPG, in that it was adopted almost nine years ago and is out-of-date in some areas. The Council could be subject to increasing numbers of challenges to the validity of the evidence base being used to secure obligations. This could affect the levels of funding the Council is able to secure, thereby affecting the level of infrastructure provided to support development.

10. BACKGROUND PAPERS

- Town and Country Planning Act 1990
- The Community Infrastructure Levy Regulations 2010 (SI 948)
- The Town and Country Planning (Local Planning) (England) Regulations 2012.
- Reading Borough Council Supplementary Planning Guidance: Planning Obligations under Section 106 of the Town and Country Planning Act 1990, Final SPG (2004);
- Reading Borough Council Core Strategy (2008)
- Reading Borough Council Sites and Detailed Policies Document (2012)
- Reading Borough Council Reading Central Area Action Plan (2009)
- Reading Borough Council Infrastructure Delivery Plan (July 2011)

APPENDIX 1: DRAFT REVISED S106 PLANNING OBLIGATIONS SUPPLEMENTARY PLANNING DOCUMENT

APPENDIX 2: EQUALITY IMPACT ASSESSMENT

Provide basic details

Name of proposal/activity/policy to be assessed:

Draft Revised S106 Planning Obligations Supplementary Planning Document

Directorate: ENCAS - Environment, Culture and Sport

Service: Planning and Building Control

Name: Alison Amoah

Job Title: Principal Planner

Date of assessment: 11/6/13

Scope your proposal

What is the aim of your policy or new service?

To set out the proposed S106 planning obligations and the relevant evidence.

Who will benefit from this proposal and how?

All developers will benefit as the Revised S106 Planning Obligations Supplementary Planning Document (SPD) will set out the proposed planning obligations that will be sought from developers.

What outcomes will the change achieve and for whom?

The Draft Revised SPD is the first stage of consultation leading to the adoption of a Revised SPD. This will enable the Council to secure developer contributions towards infrastructure, which in turn will enable sustainable development within the Borough. The SPD will provide a clear framework for developers, and the residents of the Borough will benefit from the outputs of spend of S106.

Who are the main stakeholders and what do they want?

All developers and the public. Developers want certainty over relevant costs to apply in bringing forward development proposals. Other stakeholders want to ensure that the Council uses all measures available to secure infrastructure to support development.

Assess whether an EIA is Relevant

How does your proposal relate to eliminating discrimination; promoting equality of opportunity; promoting good community relations?

Do you have evidence or reason to believe that some (racial, disability, gender, sexuality, age and religious belief) groups may be affected differently than others? (Think about your monitoring information, research, national data/reports etc)

Yes No

Is there already public concern about potentially discriminatory practices/impact or could there be? Think about your complaints, consultation, feedback.

Yes No

If the answer is Yes to any of the above you need to do an Equality Impact Assessment.

If No you **MUST** complete this statement

An Equality Impact Assessment is not relevant because the Revised S106 Planning Obligations SPD, would apply to all developers, and the levels of contribution would be based on the size and/or type of the proposed scheme. There is no evidence that any group would be treated differently. The output of the policy would be the provision of infrastructure, for which there is no evidence or belief that any group would be treated differently.

Reading Borough Local Development Framework

Supplementary Planning Document

Planning Obligations under Section 106 of the Town and Country Planning Act 1990

**Transport
Open Space, Sport and Recreation
Education
Other Contributions**

DRAFT REVISED SPD 2013

Head of Planning and Building Control
Reading Borough Council.

2013

Core Strategy 2008 adopted policies:

CS1, CS3, CS9, CS13, CS16, CS20, CS22, CS23, CS29, CS30, CS32, CS34, CS36, CS38

Reading Central Area Action Plan 2009 adopted policies:

RC1, RC2, RC3, RC4, RC9, RC14

Sites and Detailed Policies Document 2012 adopted policies:

DM2, DM3, DM6, DM16, DM18, SA1, SA2, SA4

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1.0 Introduction

- 1.1 This Supplementary Planning Document (SPD) updates the Council's S106 Supplementary Planning Guidance adopted in 2004. Its purpose is to reflect up-to-date policy requirements and relevant costs.
- 1.2 In line with the Town and Country Planning Regulations (2012)¹ a SPD must contain a reasoned justification of the policies contained it and any policies must not conflict with the adopted development plan².
- 1.3 This SPD will form an interim update pending a more thorough review alongside the introduction of Community Infrastructure Levy (CIL) within the Borough, at which point there will be a need to provide clarity as to those matters, which will be sought through S106, and that infrastructure which the Council will provide through CIL.
- 1.4 In line with requirements of the National Planning Policy Framework (NPPF) the level of planning obligations sought should not threaten delivery of a scheme. As background evidence for introducing CIL the Council commissioned an economic viability assessment. This has considered the range of development costs in developing sites, including those associated with site related S106 planning obligations. The draft proposed CIL rates take account of the ongoing need to fund site related infrastructure through S106. The adopted policy framework at the local level recognises the issue of viability and provides an element of flexibility in applying requirements for planning obligations.
- 1.5 This guidance is intended to provide users of the planning service in Reading with an appropriate framework for determining what planning obligations will be sought in considering planning applications for development.
- 1.6 This SPD should also be read in conjunction with the recently adopted Affordable Housing SPD (2013), which replaces Section 2 of the 2004 SPG, and the Employment, Skills and Training SPD (April, 2013), which replaces Section 6.
- 1.7 This document provides advice on making contributions to the following primary infrastructure:
- Transport;
 - Open space, sport and recreation;
 - Education.
- 1.8 However, there are a number of other areas relevant to planning that will be negotiated separately on individual planning applications. This will be in accordance with adopted policy DM3: Infrastructure, of the Sites and Detailed Policies Document (SDPD, October 2012), which is detailed in Section 8 below. In

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012, S.I.2012 no.767

² Core Strategy (2008), Reading Central Area Action Plan (2009), Sites and Detailed Policies Document (2012)

addition a S106 obligation must meet the relevant legal tests as set out in paragraph 2.1 below.

- 1.9 In accordance with SDPD policy DM3 development proposals will be expected to mitigate all relevant impacts, but where for example for reasons of viability it will not be possible then the Council will take into account the priorities as set out in the policy when seeking to agree an appropriate range of measures.
- 1.10 The guidance will normally apply to all developments comprising a net addition of 1 dwelling or more and to all commercial floorspace comprising a net addition of more than 100m².
- 1.11 The rate of any contribution defined under the provisions of the SPD will be increased annually (As at April 1st) by an amount equivalent to the increase in the All Items Index of Retail Prices issued by the Office for National Statistics.
- 1.12 Table 1 below provides a summary of the type of contributions which will be sought.

Table 1: Summary of S106 Requirements Being Sought

| Type of Contribution Sought | Requirements (per unit - dwelling/100m ² /bed) |
|--|--|
| Affordable Housing | Refer to Affordable Housing SPD adopted July 2013 |
| Transport - Reading Urban Area Package (RUAP) for housing (Refer to Table 3) | £2,400 - £3,500 per dwelling depending on size/trip generation |
| Transport - RUAP for commercial B use classes (Refer to Table 3) | £1,200 per 100m ² (B8) £3,174 per 100m ² (B2) £5,030 per 100m ² (B1) |
| Transport - RUAP for retail uses (Refer to Table 3) | £14,496 (weighted) - £56,316 (weighted) per 100m ² |
| Transport - RUAP for leisure (Refer to Table 3) | £11,604 (weighted) per 100m ² |
| Transport - RUAP for hotel (Refer to Table 3) | £2,727 (weighted) per bed |
| Open Space, Sport and Recreation | £2,100 for small dwelling (up to 75m ²) £2,800 for large dwelling (over 75m ²) From £788 per room (covering student accommodation, hotels and guest houses, Houses in Multiple Occupation; town centre service apartments) |
| Education | £2,795 - £11,334 (for primary, secondary and post 16 education) per dwelling depending on the size and type of dwelling |
| Economic Development | Refer to Employment, Skills and Training SPD, April 2013 |
| Other | To be negotiated separately as appropriate on major schemes |

2.0 Relevant Policy and Legal Framework

- 2.1 In seeking planning obligations three legal tests have to be applied. These were introduced as part of the Community Infrastructure Levy Regulations 2010 (as amended)³. These tests replaced those set out in Circular 5/05 and are identified in the National Planning Policy Framework (NPPF, 2012) paragraph 204. This states that "*Planning obligations should only be sought where they meet the following tests:*
- *Necessary to make the development acceptable in planning terms;*
 - *Directly related to the development;*
 - *Fairly and reasonably related in scale and kind to the development"*.
- 2.2 The NPPF recognises that where safeguards are necessary to make a particular development acceptable in planning terms the development should not be approved if the measures required cannot be secured through appropriate conditions or obligations through agreements. The NPPF also sets out in paragraph 173 that it is important that the scale of obligations does not threaten the ability of a site to be developed viably.
- 2.3 At the local level the Council has a number of relevant policies. Reading Borough Council's Core Strategy (2008) includes Policy CS9: Infrastructure, Services, Resources and Amenities, which requires development proposals to be sustainable through the provision or re-provision of any infrastructure, services, resources or other assets affected by the development. Adopted Policy DM3: Infrastructure, Sites and Detailed Policies Document⁴ sets out the specific infrastructure types, for which planning obligations will be sought. The Policy includes a prioritisation to be applied, for example for reasons of viability, when seeking to agree an appropriate range of measures for which planning obligations will be secured.
- 2.4 A number of policies within the Core Strategy include specific thresholds and quantified requirements for the provision of infrastructure. There are also policies, which include general requirements to enhance facilities, and to make new provision where appropriate, for example with regard to community infrastructure (CS32), biodiversity (CS36) and access to open space (CS30). There are also policies which require specific mitigation measures including CS20: Implementation of the Reading Transport Strategy; CS22: Transport Assessments; CS34: Pollution and Water Resources; and CS38: Trees, Hedges and Woodland.
- 2.5 The Reading Central Area Action Plan (RCAAP, 2009) and the SDPD include a number of site specific allocations which include reference to specific infrastructure which will need to be considered in bringing the site forward for redevelopment as well as specific policies such as DM16: Provision of Open Space.
- 2.6 These policies seek to ensure that development proposals make an appropriate contribution towards necessary and relevant physical and social infrastructure in order to ensure that development is both sustainable and contributes to the proper planning of an area.

3.0 Procedures

- 3.1 At present the handling of S106 planning obligations is undertaken in accordance with the Council's adopted S106 Procedure (September 2011). This Procedure

³ Regulation 122 (2)

⁴ SDPD, 2012

covers the entire S106 process, from request for contributions from developers through to the monitoring and collection of monies and the final allocation of receipts to specific projects.

- 3.2 In summary, the Council will assess each application individually, to determine whether an obligation is needed, and what matters it should address, and will justify the reasons for seeking an obligation/s.
- 3.3 Any requirement for a S106 will be raised with a developer as early in the process as possible. Details of the agreement will be recorded on the Council's S106 database. As the timetable for determining planning applications is 8 weeks for minor applications and 13 weeks for major applications it is advisable for heads of terms for Section 106 agreements to be agreed and documented prior to the submission of any planning application. The Council encourages pre-application discussions, one reason is to ensure that the process of agreeing, drawing up and signing agreements is well advanced and can be completed within the planning application determination period. Applications may be refused where agreements are not ready to be signed within the determination period.
- 3.4 The Council will use its reasonable endeavours to process Section 106 negotiations and agreements as quickly as reasonable. However, it is a complicated legal process and ample time needs to be available to complete the process. Developers will need to brief their own legal advisors early in the pre-application process.
- 3.5 Where an agreement is needed, developers will need to provide the following information:
 - (i) Proposed heads of terms of the legal agreement;
 - (ii) Copies of the "title deeds";
 - (iii) In the event that there are any charges, mortgages or other securities secured on the land, the names and addresses of the charges/mortgagees/holders of the security (since it will be necessary for any such to be joined as parties to the agreement and/or consent to its terms or execute a 'Consent to Dealing' as appropriate);
 - (iv) An undertaking to pay the Council's appropriate legal costs in connection with the preparation of the legal agreement/unilateral undertaking;
 - (v) In the event that the applicants are represented by solicitors, the relevant contact address and name of solicitor/person dealing with the matter.
- 3.6 Details should be included as part of the application to ensure that it is clear what is being offered by the development so that interested persons are aware of the full picture. The Council will provide applicants with a timetable for completing actions so that planning applications can be determined within the specified target period. It is unlikely that applications can be determined with a

favourable recommendation where such information is not provided before or at the same time as the application is submitted and registered.

- 3.7 Payment of contributions will generally either be sought upon commencement of development, or on occupation, depending on the type of obligation, unless it is agreed that an alternative stage in development is appropriate and acceptable. For larger scale proposals, the Council will (where appropriate) consider payment of contributions "phased" (dependent on material circumstances) according to (a) commencement, (b) different stages in implementation, (c) occupation and (d) phased completions on site, to be agreed by negotiation. Payments will (where appropriate) be index linked to the Retail Prices Index from the date of the agreement.

4.0 Monitoring and Expenditure

- 4.1 All S106 agreements are recorded on the Council's S106 database and there is a specific Officer within the Planning Section responsible for S106 monitoring. The Officer is responsible for regularly monitoring the implementation of development and on-going monitoring is undertaken throughout the year. However, the principal method used to identify Section 106 payments, that are overdue, is the Council's commitments monitoring which provides a snap shot of development progress every year. The results of the monitoring are checked against the Section 106 database, which has a comprehensive record of signed agreements and unpaid contributions, and the records for payments received.
- 4.2 All S106 payments received are recorded on the database immediately so any reports of developments reaching the trigger points for payment of contributions can be checked to see if any action is necessary.
- 4.3 Where a development has been commenced the Officer checks the obligations to determine whether they have been met in accordance with the trigger and terms of the agreements and chases these up in writing accordingly.
- 4.4 The Council publishes annual information on its website on S106 as part of its annual statement and accounts. This sets out the details and description of the scheme, S106 agreement number, amount brought forward into the accounting year, receipts within the accounting year, expenditure total, for what, and the amount to be carried forward into the next financial year.

5.0 Transport

Introduction

- 5.1 New developments have direct and indirect impacts for the transport systems in Reading and should contribute towards the mitigation of the negative impacts and the realisation of an improved and integrated transport system.

Policy Background

- 5.2 The key focus of the National Planning Policy Framework is that strategies are developed which provide for viable infrastructure necessary to support sustainable development. It also identifies that all developments that generate significant amounts of movements should be supported by a Transport Statement or Transport Assessment.
- 5.3 The Council's third Local Transport Plan (LTP3), was adopted in April 2011 and contains two documents. The longer term strategy document sets the context up to 2026, whilst a 3 year rolling improvement plan details the current priority schemes. This builds upon LTP2, which focussed on developing long term transport measures and initiatives which promoted an integrated and balanced transport environment. Spending plans and annual progress plans are included in an annual report to the Council's Traffic Management Sub-Committee in March of each year⁵.
- 5.4 The Adopted Core Strategy (2008) highlights that the scale of development envisaged during the Plan period will have significant impacts on the transport system and that this will require major investment in all modes of transport. The Core transport infrastructure projects form an integral part of the spatial strategy and future development depends on the implementation of a range of projects, schemes and programmes. Policy CS20: Implementation of the Reading Transport Strategy requires that developments contribute to the provision of a balanced transport network. Other policies require provision of and commitment to measures to promote and improve sustainable transport facilities.
- 5.5 There are specific site allocations within the RCAAP and SDPD which require specific transport measures and/or appropriate contributions towards specific core transport projects.

Justification

- 5.6 Person trip movements resulting from larger new developments have significant impacts on transport infrastructure in terms of transport movements and the need for people to gain access via a range of transport modes. Such developments should make provision for necessary improvements arising directly from their use. Reduced car parking provision, that enables higher density

⁵ The latest report is at the following link:

<http://www.reading.gov.uk/GetAsset.aspx?id=fAAyADQAOAA1ADMAfAB8AFQAcgB1AGUafAB8ADAAfAA1>

development, means that it is essential that developments make appropriate provision for upgrading systems of non-car transport provision to enable residents and employees in such developments appropriate levels of accessibility. This is particularly the case in Central Reading.

- 5.7 In addition, new development has impacts on wider transport systems, which are already very congested. In the future, efficient and sustainable movement in and around the Borough and elsewhere will necessarily depend on the development of more integrated, usually non-car, transport systems. Person trip movement generation by new development adds significantly towards the need to improve and develop transport systems, in an already congested area, and should therefore contribute towards the improvement and development of the overall transport system.
- 5.8 It is not sufficient therefore for a development to only contribute to transport improvements in the immediate vicinity of the site i.e. origin of trips. As new developments have direct and indirect impacts for the transport systems in Reading they should contribute towards mitigation of the negative impacts and the realisation of an integrated transport system. The Council will therefore seek developer contributions for improvements to infrastructure along transport corridors and at popular destinations, such as rail and bus stations, town and local centres etc.

Calculation of Contributions

- 5.9 The Council adopted the Local Transport Plan 3: Strategy 2011-2026 in April 2011⁶ and the spending plans required within this Local Transport Plan are calculated at £15.4 million for the spending period April 2012- March 2014 equating to a total of £7.7 million a year⁷.
- 5.10 New development will have a significant impact on the number of trips and should pay a proportion of the anticipated spending, to implement the programme of works which cannot be met through other funding and grants. In the main this will come from housing and employment developments although retail and other commercial developments will also contribute at a level commensurate with the level of person trip movements generated by such development.
- 5.11 Survey work derived from a number of sources⁸ provides estimates of person trips generated by different uses. Using these estimates, development impacts on the transport system can be apportioned, and a calculation made of a contribution per trip towards the annual expenditure figure. Average daily person trip rates are as set out in Table 2 below.

Table 2: Average Number of Person Trips for Different Development Types

| Development Type | Average Daily No. of Person Trips |
|---|-----------------------------------|
| Residential - Large Private Housing (4+ bedrooms) | 11.60 |

⁶ http://www.reading.gov.uk/documents/transport_streets/UTMC/24361/LTP3-Strategy-Plan.pdf

⁷ The latest report is at the following link:

<http://www.reading.gov.uk/GetAsset.aspx?id=fAAyADQAOAA1ADMAfAB8AFQAcgB1AGUafAB8ADAafAA1>

⁸ A combination of NTS data and Trip Rate Information Computer System (TRICS) version 6.11.2 Multimodal Trips Survey data.

| | |
|---|-------|
| Residential - Average Private Housing (3 bedrooms) over 75m ² | 9.43 |
| Small private dwelling (1+2 bedroom) up to 75m ² | 9.0 |
| Small rented (affordable) dwelling (1+2 bedroom) up to 75m ² | 8.03 |
| B1 Office Employment per 100m ² | 16.67 |
| B2 General Industry per 100m ² | 10.52 |
| B8 Warehouse (Distribution) per 100m ² | 3.91 |
| Leisure per 100m ² | 71.23 |
| Retail (non-food) per 100m ² | 60.60 |
| Retail (food) per 100m ² | 252 |
| Hotels (with conference and open facilities open to non-residents) per room | 11.58 |

Source: Analysis of TRICS 2013 (a) V6 6.11.2 Multimodal Survey data

- 5.12 Proposed new development will contribute a proportion of the total cost of delivering the annual LTP programme. Based on a calculation of average per annum trip rates from new development, against a proportion of the £7.7million, would require £302 per daily unit trip for proposed new development. By multiplying the person trip rates from Table 2 by £302, results in the following rounded contribution level for various forms of development, set out in Table 3 below.

Table 3: Transport Contribution per Development Type (per unit)

| Development Type | Per Unit of Measurement | Contribution | Weighted Contribution |
|--|-------------------------|--------------|-----------------------|
| Residential - Large Private Housing (4+ bed) | dwelling | £3,500 | |
| Residential - Average Private Housing (3 bed) | dwelling | £2,850 | |
| Small private dwelling (1+2 bed) | dwelling | £2,700 | |
| Small rented (affordable) dwelling (1+2 bedroom) | dwelling | £2,400 | |
| B1 Office | 100m ² | £5,030 | |
| B2 | 100m ² | £3,174 | |
| B8 | 100m ² | £1,200 | |
| Leisure | 100m ² | £21,490 | £11,604 |
| Retail (non-food) | 100m ² | £18,120 | £14,496 |
| Retail (food) | 100m ² | £76,104 | £56,316 |
| Hotel | bed | £3,497 | £2,727 |

Note: The Weighted Contribution relates to the percentage of the daily person trips undertaken during the peak hours 08:00 - 09:00 and 17:00 - 18:00. The weighted contributions generally comprise reductions in relation to total trip rates reflecting the fact that a high percentage of trips to certain uses take place outside peak hours when there is the greatest pressure on transport systems.

Types of Measures

a) *Site Specific Localised Impacts*

- 5.13 Developments will be required to provide on-site access and estate roads and to provide or contribute towards off-site improvements, such as junction

improvements made necessary by the level of movement anticipated from that development or providing links to the local pedestrian/cycle system. Such developments will also be expected to provide footways, cycleways, lighting, bus stops, contributions to public transport services, electric vehicle charging point infrastructure etc., within the development and to provide infrastructure such as footpaths, cycleways and public transport infrastructure and services to ensure a minimum level of accessibility by different modes from their sites to local services and facilities.

- 5.14 Developers of employment and other traffic generating schemes will also be expected to enter into agreements to prepare and to operate in accordance with agreed travel plans that aim to reduce travel and car use and promote more sustainable non car modes of transport for access to any development.

b) *Wider Transport impacts*

- 5.15 In addition, developments will be expected to contribute to wider and strategic transport improvements, particularly in relation to roads, public transport, including mass rapid transport and park and ride, and facilities for cycling and pedestrians. Such improvements are set out in the Council's Local Transport Plan and Annual Progress Reports on the Plan⁹. These contain costed programmes of works. It is clear that new development should contribute towards transport projects and schemes serving the wider area. A large proportion of the projects under the Local Transport Plan will only go ahead, thus facilitating the levels of development anticipated, if funding is forthcoming from all new development.
- 5.16 The level of movement associated with new development and consequently the amount of contribution that should be sought can vary according to location. Residential properties in town centres, particularly where car-parking provision is low, are highly accessible locations for walking and cycling. Residents of developments in such locations can access a wide range of services and facilities, including employment, with minimal amounts of travel. However, in order to ensure a high level of access both within and around the town centre, transport facilities continue to need to be improved. Residents of town centres may work outside the Centre or need to have access to facilities outside the Centre, in which case they add to the need to provide wider transport improvements and such developments should make an appropriate contribution. Such residents will also benefit from programmed and planned improvements to transport systems serving the Central area in the future.
- 5.17 Similarly, employment located in town centres is highly accessible and this is undoubtedly the most sustainable location for such development. Town centre accessibility does, however, need to be improved both for journeys within the town centre and journeys to and from the town centre. For Reading, further high levels of investment are likely to be required for improving town centre accessibility in terms of capacity, quality, convenience, etc. Projects and

⁹ Refer to the latest report at the following link. This is presented annually:
<http://www.reading.gov.uk/GetAsset.aspx?id=fAAyADQAOAA1ADMAfAB8AFQAcgB1AGUafAB8ADAafAA1>

schemes providing better facilities for walking and cycling, improving bus links, major improvement works at Reading Railway Station and the track in and out of the station, enhanced park and ride facilities and a Mass Rapid Transit System (forming part of a Strategic Thames Valley Network), will greatly improve overall accessibility.

6.0 Open Space, Sport and Recreation

Introduction

- 6.1 Parks and open spaces provide an essential contribution to the quality of life and health of everyone. As well as contributing to the townscape, they provide wildlife corridors and help promote and sustain biodiversity. A good quality public environment can have a significant impact on the economic life of a town or city as an essential part of any regeneration.
- 6.2 The Borough Council is required to co-ordinate the provision of recreational and leisure facilities to meet the needs of all those residents within its region. The land-use planning system makes an important contribution to this function.
- 6.3 There is a long tradition in Reading of obtaining contributions from development schemes towards quantitative and qualitative improvements in open space, recreation, community facilities and environmental improvements in the Borough.
- 6.4 Reading Borough Council's definition of open space follows central government guidelines:
1. Parks and gardens - including urban parks, country parks and formal gardens;
 2. Natural and semi-natural urban green spaces - including woodlands, urban forestry, scrub, grasslands (e.g. downlands, commons and meadows) wetlands, open and running water, wastelands and derelict open land and rock areas (e.g. cliffs, quarries and pits);
 3. Green corridors - including river and canal banks, cycleways, and rights of way;
 4. Outdoor sports facilities (with natural or artificial surfaces and either publicly or privately owned) - including tennis courts, bowling greens, sports pitches, golf courses, athletics tracks, school and other institutional playing fields, and other outdoor sports areas;
 5. Amenity green space (most commonly, but not exclusively in housing areas) - including informal recreation spaces, green spaces in and around housing, domestic gardens and village greens;
 6. Provision for children and teenagers - including play areas, skateboard parks, BMX tracks, outdoor basketball hoops, and other more informal areas (e.g. 'hanging out' areas, teenage shelters);
 7. Allotments, community gardens, and city (urban) farms;
 8. Cemeteries and churchyards;

Items 1-4, and to some extent items 7 and 8, are strategic spaces that serve the Borough as a whole - or large areas of the Borough. Items 5 and 6 are more dispersed local provision, serving local communities.

Policy Background

- 6.5 The NPPF states that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. One of the 12 core planning principles identified in the NPPF includes taking account of and supporting local strategies to improve health, social and cultural wellbeing, and delivering sufficient community and cultural facilities and services to meet local needs. The NPPF also includes "Promoting Healthy Communities" as one of the themes identified for delivering sustainable development and states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.
- 6.6 Reading's Sustainable Community Strategy aims to make healthy and attractive spaces available to all residents.
- 6.7 The Council's Open Spaces Strategy (2007) sets out aims and objectives to secure a more integrated, easily accessible and robust approach to the provision and distribution of open space. It points to a need for substantial qualitative improvements to many open space areas to meet the need of both the existing population and those occupying new developments. The Strategy states, with regard to S106, that "when negotiating new S106 agreements, new standards based on the local provision standards will be sought as the minimum provision as part of new developments."
- 6.8 There are a range of local strategies providing a vision and programme for:
- Improving the network of public open spaces (The Thames Park Plan, 2004);
 - Measures to protect and/ or mitigate the loss of important habitat (The Biodiversity Action Plan, 2006);
 - Increasing activity in allotment gardening (Reading's Allotments Plan, 2005);
 - Improving play opportunities for children, young people and families across the town (Reading's Play Strategy, 2010).
 - Protecting and increasing the number of trees across the Borough (The Council's Tree Strategy, 2010)
- 6.9 There are a range of site specific management plans whose overall objectives include improvement, enhancement and protection of important green spaces in Reading.
- 6.10 Policies in the Core Strategy, RCAAP and SDPD provide the context for developer provision of leisure, recreation and open space facilities in the Borough. In particular Core Strategy Policy CS29: Provision of Open Space requires all new development to make provision for the open space needs of the development through appropriate on- or off-site provision. Where a site has 50 units or more, or where a deficiency has been identified, the new open space is to be provided on site. Policy DM16 of the SDPD explains the type of open space or improvements to open space that will be required.

Justification

- 6.11 Over a long period the Council has recognised the deficiencies in certain types of open space in particular locations as well as issues over the quality of open space provision within the Borough. The Council's Open Spaces Strategy (2007) and the Background Paper (2006) identify that, overall, the Borough is generally well served for open space, but that the total open space is less than national guidelines recommend and the distribution is uneven across the Borough. The key areas of deficiency are as follows:
- In central Reading, public open space is by and large where residents are not. However, as it is impractical to create new open space the Council will seek contributions to improving open space on the edge of the town centre and in public realm improvements;
 - In north Reading, large areas are lacking children's play facilities;
 - Areas immediately to the west, north-west, south and east of the town centre are amongst the most poorly supplied in the Borough in terms of recreational open space; the problem is exacerbated by very dense housing;
 - In the south there is no higher-tier park which would offer a greater variety of facilities;
 - Severance lines reduce further residents' access to open space.
- 6.12 New development, irrespective of its size, inevitably places increased pressure on all types of existing open space infrastructure. Each additional resident moving into a new development, who uses publicly provided leisure facilities, requires a marginal increase in the capacity of existing facilities as well as adding to the demand for additional facilities. It is important, therefore, that developments contribute to a managed programme of targeted open space growth and enhancement/ improvement of existing areas, in order to support sustainable growth in the Borough. Contributions from developments will be used to assist in implementing the adopted Strategies (referred to above), helping to mitigate the impact of new development in accordance with development plan policies.
- 6.13 All residents in urban areas need access to parks, open spaces, sports pitches, places to walk, place to run, places to relax in or play. Such provision is seen as increasingly important for public health. In the current era of high density developments that reduce external amenity areas and open space, the need for proper open space provision, and safe easy access to such spaces, is even more imperative. Consequently it is essential that new developments make provision for open space to meet the needs of the residents/occupiers of the development especially in the absence of any on-site recreational facilities. With a growing population resulting from new development, the amount and quality of open space in the Borough should increase over the Plan period.

Calculation of Contributions

- 6.14 The Council has an informal comprehensive costed list of required investment per park, the value of which is many millions of pounds. The list includes both new

infrastructure and improvements to increase the capacity of existing facilities through bringing them up to modern standards. This investment list is updated regularly, and is used as a basis for identifying specific projects relevant to proposed developments. This includes specific detailed projects as set out within adopted strategies and plans such as the Thames Parks Plan.

- 6.15 There are two main types of developer contributions to open space provision namely, on-site and off-site. The following provides details of such obligations and the basis of calculation for any financial contributions sought.

a) On-site provision

- 6.16 In line with Core Strategy Policy CS29: Provision of Open Space where a site has 50 units or more, or where a deficiency has been identified, new open space is to be provided on-site. This would involve a non-financial obligation as part of a S106 agreement and would require direct provision on-site by the developer.
- 6.17 There will be a presumption that the Council will not adopt additional areas of public open space except in exceptional circumstances. Developers will therefore need to make provision for the continuing future maintenance of these open spaces, and the Council will need to be satisfied that such arrangements have been made for their long-term maintenance, which is usually through some form of private management arrangement.
- 6.18 In those instances when the Borough Council is prepared to adopt and maintain properly laid out public open space and play areas within urban residential areas, this will be subject to a payment by the developer of a commuted sum. This payment should cover costs of maintenance in perpetuity (usually 50 years).
- 6.19 On payment of the commuted sum, and when all liabilities for construction, equipment and maintenance have been met to the Borough Council's satisfaction, the open space will be transferred to the Council.
- 6.20 The commuted sum figure is calculated using current contract prices and maintenance costs for maintaining open space. This is currently calculated from existing work schedules, etc. This figure is multiplied to establish a fifty-year maintenance figure, which allows for inflation of contract prices, and deflation for diminishing present values over time.
- 6.21 Planning permission for developments will be subject to a legal agreement that will include all the above details. Commuted sums within these agreements will be index linked from the date the agreement was signed.

b) Off-Site Provision

- 6.22 In most circumstances (especially for small developments where it is not practical for open space or recreation facilities to be provided on-site, where it would be too small to be of any practical use), it is likely to be more appropriate to seek off-site contributions. These will be put towards capacity improvements and the enhancement of existing open spaces in the locality of the development.

- 6.23 Additionally, contributions will be sought towards the capital expenditure required to increase the capacity of the areas of open space that serve all of the population of the Borough. These will be used for sports and play provision, other recreational enhancements, allotments provision, improving nature conservation, implementing the Biodiversity Action Plan and improving rights of way where they relate to parks and other open spaces. Priorities as to which improvements are required as a result of increasing population pressures are continually being assessed.
- 6.24 The calculation of contributions for off-site open space is as follows:

Table 4: Contributions Towards Open Space Provision

| Development Type | Contribution |
|--|--------------------|
| C3 residential - small dwelling up to 75 m ² | £2100 per dwelling |
| C3 residential - Large dwelling over 75 m ² | £2800 per dwelling |
| Hotels and guest houses ^a | £788 per room |
| Town centre serviced apartments ^b | £966 per room |
| Student accommodation ^c | £788 per room |
| Houses in Multiple Occupation (over 6 person - large HMOs - Sui Generis) ^d | See below |
| Offices (B1a) ^e | See below |

- ^a This assumes that there is 75% occupancy and that of those 50% will use parks and open spaces (against small dwelling rate of £2,100).
- ^b This assumes that there is 92% occupancy and of those 50% will use parks and open spaces (against small dwelling rate of £2,100).
- ^c This is based on applying 50% of the small dwelling rate of £2,100, because single people or couples, rather than families are accommodated in student accommodation. However, since students are in residence for 75% of the year, the contribution is discounted to reflect this.
- ^d This would be based on the additional occupants over and above that which could have been accommodated in the original (C3) dwelling house. For example if there are 10 bedrooms, there would be a minimum of 10 people. Given that a large dwelling could accommodate 6 people it would be reasonable to request a contribution towards the 4 additional occupants of £2,800 (based on large dwelling rate).
- ^e For major office schemes a contribution will be sought towards enhancements to public open space/ other public realm. This will be based on a calculation of the total number of employees, the associated estimated number of visits to a specific public open spaces/ public realm and a pro-rata contribution towards specific costed programmes. E.g a B1a office scheme of 5000m², assuming a density of 12 employees per m², would equate to 416 employees. Assuming each employee visits the open space/ public realm once per week this results in an increase of 21,632 visits. Assuming existing visitor numbers are 3 million and the overall costs of enhancement/ repair is £2.5 million the cost attributed pro-rata to the additional visitors, would equate to a contribution of £17,738 - i.e. £2.5 million/(3 million (existing visitors) + 21,632 (additional visitors)) = 0.82 x 21,632

Types of Measures

- 6.25 Contributions will be sought to pay for specific works or improvements set out in approved Council strategies and programmes which are approved through Policy Committee on an annual basis.
- 6.26 In terms of on-site open space provision this should be well located to the rest of the development in which it is to be provided and be of a usable size and shape, and must be capable of use for a range of activities across a range of ages. Such provision will include related facilities, such as seating, cycle parking, play equipment and equipment suitable for teenage groups, e.g. shelters, basketball hoops and goal posts, both for informal social and recreational purposes. The design of open space and recreation facilities must aim to secure a safe environment. Advice on the dimensions, design and provision of open space and recreation facilities should be sought from the Council's Parks Section.
- 6.27 Off-site local facilities will include amenity greenspace (most commonly, but not exclusively in housing areas), formal and informal parks, gardens and other recreation spaces, village greens, provision for children and teenagers, allotments, sports facilities, rights of way, and other more informal areas.
- 6.28 Examples of improvements include (but are not limited to) the following: new furniture (seats, benches, picnic tables, bins); planting (trees, shrubs, herbaceous plants and bulbs); boundary and entrance improvements; new toddler, junior and teen play equipment; sports facilities; improvements to drainage and surfacing of sports pitches; signage and interpretation information; new paths and the upgrade of existing ones; habitat improvements; and investment in supporting infrastructure, like parking, toilets, changing rooms and catering facilities.

7.0 Education

Introduction

- 7.1 Local authorities have a statutory duty to make sufficient, suitable school places available for pupils living within their areas. Local authorities may meet increased demand for places in several ways: using surplus places at existing schools and transporting children to these if necessary; expanding existing schools through improving the suitability and condition, converting existing spare accommodation, or constructing a new extension; or facilitate the development or opening of new schools. There is significant evidence now that the quality of the built environment in schools and other settings has a direct, positive impact on the quality of learning.
- 7.2 The need for school places has increased in recent years due to a range of factors including in-migration and significant increases in the birth rate in the Borough. Using Census information, between 2001 and 2011, the population of the Borough rose by just over 12,500¹⁰, an 8% increase. The 0-5 year old population has grown 34% between the census years of 2001 and 2011, which has led to a growth in demand for primary places of around 20% - 2520 places in total.
- 7.3 In 2009-12 RBC provided 770 permanent new places in primary schools through expansions and improvements to existing schools. Since September 2011 RBC has planned for a total of 595 additional places in primary schools up to and including September 2013. From September 2014 onwards permanent solutions are required and RBC has forecast the need to provide 2520 additional primary places with immediate effect. By September 2017 all existing secondary school capacity will be full.

Policy background

- 7.4 In terms of delivering sustainable development the NPPF (2012) identifies, under the theme of promoting healthy communities that the *“Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities”*. In achieving this it states the local planning authorities should give weight to the need to create, expand or alter schools.
- 7.5 Adopted Policy DM3 of the SDPD states that proposals for development will make appropriate provision for infrastructure, which includes education infrastructure including cross boundary facilities.

Justification

- 7.6 Reading’s primary school places are under huge pressure and will begin to have an impact on secondary provision in 2016/17. The Council forecast the need to provide 2520 additional primary school places from September 2014. The total level of funding required is in the region of £47 million and although there is

¹⁰ Based on 155,698 2011 population and 143,096 2001 population, ONS

funding available through the Department for Education's Targeted Basic Need Programme this is funding at a level far below that which is required to provide new school places. Local Authorities need to finance the gap. Additional development brings with it pressures on the existing educational school places and therefore developments, based on their specific pupil product, should contribute to creating additional spaces and additional capacity at existing schools.

Calculation of contribution

- 7.7 Consistent with meeting its duties and responsibilities, Reading Borough Council will seek a contribution from developers towards the costs of providing or improving schools in the area of the particular development arising out of the impacts of that development. A contribution will be sought per dwelling based on the pupil yield of dwellings when the development would have an impact on local school(s). The contribution will vary according to the number of bedrooms of the dwelling and whether the dwelling is a house or a flat or apartment. One-bedroom dwellings will not be required to contribute towards educational facilities as the yield is considered to be too low.
- 7.8 Where the schools in the area of the development would require new places in order to meet the projected additional demand due to that development, the full contribution will be sought. In some cases, a commuted contribution will be sought towards the costs of refurbishment to improve the condition and suitability of accommodation in schools and of developing other facilities to meet the demands of the increasing school roll.
- 7.9 It is Reading Borough Council policy for primary schools to admit "Rising Fives", so the primary school pupil yield is that for children aged 4 - 10. The secondary school pupil yield is that for children aged 11 - 18.
- 7.10 The current programme for additional school places in Reading (mainly through the expansion of existing schools) indicates an average build cost per place (excluding any land cost) of in the region of £24,000. Allowing for assumed levels of government funding per additional place and some locally sourced funding (including capital borrowing), the provision of each additional space will require an average of £7,763 from other sources. New residential development will be expected to provide that level of funding to enable additional educational spaces to be provided, to ensure adequate education provision to meet the pupil product of new development.
- 7.11 The formula used to calculate a contribution is:
- Pupil product x average cost per place**
- The Pupil product is identified in tables 5 and 6 below.
 - The average cost per place of £7,763¹¹

¹¹ This is based on an estimate of the gap remaining to fund the average cost per place in Reading, less an allowance for current government funding along with an allowance for local funding derived from borrowing and other sources.

Table 5: The Pupil Product Ratio for Houses in Reading

| Dwelling Size | Rising Fives (4) | Primary (5-10) | Primary including Rising Fives (4-10) | Secondary (11-16) | Post 16 (17-18) |
|---------------|------------------|----------------|---------------------------------------|-------------------|-----------------|
| 2- bed | 0.10 | 0.56 | 0.66 | 0.15 | 0.01 |
| 3-bed | 0.13 | 0.74 | 0.87 | 0.51 | 0.08 |

(Note these are based on figures derived from the Study of the Pupil Product of New Housing in Berkshire, 2001. In calculating contributions, the Council will apply the figures for the 3 bedroom house for all houses of 3 bedrooms and over).

- 7.12 The study shows the average pupil yield for a particular type of dwelling. For example, 100 new 2-bed dwellings will generate 10 four-year old children, 56 primary school children, 15 secondary school children and 1 post 16 student. Also, 100 new 2-bed dwellings will create pressure on primary schools from the 56 actual children and the 10 four-year old children who will move onto primary schools in one year. Similarly, 100 new 2-bed dwellings will create pressure on secondary schools from the 15 actual children and the 56 children in primary schools who will move onto secondary schools in the next 5 years.
- 7.13 The *Study of the Pupil Product of New Housing in Berkshire, 2001* did not include flats and apartments as it was assumed that there would not be a significant difference between the pupil yields of flats and apartments and houses. There is no distinction made between a flat and an apartment. A flat/apartment is a dwelling that is not a house and part of which is above or below another dwelling. A subsequent analysis of actual pupil yield of 2 bedroom flats/apartments was carried out. The figures for 3 bedroom flats was calculated by scaling each 2 bedroom flat pupil yield by the corresponding ratio of pupil yields for 3-bedroom houses compared with 2-bedroom houses. A similar calculation was carried out to find the yield for 4 and over-bedroom flats.

Table 6: The Pupil Product Ratio for Flats/Apartments in Reading

| Dwelling Size | Rising Fives (4) | Primary (5-10) | Primary including Rising Fives (4-10) | Secondary (11-16) | Post 16 (17-18) |
|-----------------------|------------------|----------------|---------------------------------------|-------------------|-----------------|
| 2 - bed flat | 0.12 | 0.17 | 0.29 | 0.05 | 0.02 |
| 3 - bed and over flat | 0.18 | 0.22 | 0.40 | 0.17 | 0.16 |

(Note these are based on figures derived from an analysis of the actual yield of flats/apartments, December 2002. In calculating contributions, the Council will apply the figures for the 3-bedroom flat for all flats of 3 bedrooms and over)

- 7.14 Worked examples of education contributions are attached at Appendix 1.

Types of Measures

- 7.15 Education contributions will be used towards creating additional school places by funding the expansion of existing schools, refurbishment of existing schools to increase their capacity or through facilitating the provision of new schools.

8.0 Other Contributions

- 8.1 In accordance with adopted policies CS9 (Core Strategy, 2008) and DM3 (SDPD, 2012) proposals for development need to make appropriate provision for relevant infrastructure, resources and amenities. This SPD provides detail in sections 5-7 above for those primary areas of infrastructure to which the Council will seek S106 obligations. In relation to some sites, the Council will also be seeking contributions towards other items of infrastructure, as relevant to a specific site. The other types of infrastructure are as set out in policy DM3: Infrastructure and referred to as follows:
- 8.2 ***Economic Development*** services and infrastructure, including employment, skills and training development initiatives and childcare provision – Employment, skills and training measures are dealt with through the Employment, Skills and Training SPD, adopted April 2013. Adopted Core Strategy Policy CS13: Impact of Employment Development recognises that new employment may have a wide range of impacts, and as well as securing planning obligations for employment, skills, and training there are other measures which may be necessary to maximise the potential of the existing population to fill the jobs being created. Access to childcare facilities is a barrier to many wishing to take up employment. For major employment generating developments (1000m² or more) contributions to or the provision of affordable childcare facilities will be sought. The size of a workplace nursery should be proportional to the employment generated.
- 8.3 ***Energy infrastructure***, including decentralised energy projects – In accordance with SDPD Policy DM2: Decentralised Energy, any development of more than 20 dwellings and/or non-residential development of over 1000m² shall consider the inclusion of a Combined Heat and Power plant or biomass-fuelled heating system, or other form of decentralised energy provision. In the longer term obligations may contribute towards Allowable Solutions, which are the Government's strategic mechanism that compensates for the residual emission from residential development by delivering approved carbon saving projects (these could be on, off or near site solutions).
- 8.4 ***Health provision, Police Service infrastructure, and Community facilities*** – For large residential schemes, which add to local pressures on health, Police and other community infrastructure, obligations will be sought to contribute towards local community based provision, where there is a shortfall in other available funding sources. Adopted Core Strategy Policy CS32: Impacts on Community Facilities requires mitigation to be provided in line with the scale of additional impacts.
- 8.5 ***Leisure and cultural*** infrastructure including public art, library and archive services - For major schemes, developers will be encouraged to adopt the percent for art recommendation whereby approximately 1% of total construction costs is given over to public art either as part of the proposals or in the locality of the application site.

- 8.6 ***Reading Central Area infrastructure and amenities***, including public realm and street care enhancements and ***Environmental enhancements outside of the Central Area***, such as within local centres, including off-street tree and other tree planting - Contributions will be sought from proposed developments located in areas where environmental improvements/ enhancements are programmed, or which lie in the vicinity of a local centre where works are proposed, where the resulting development will benefit from such works.
- 8.7 ***Measures to tackle poor air quality or for on-going air quality monitoring*** - Adopted SDPD policy DM19: Air Quality, sets out that development should have regard to the need to improve air quality and reduce the effects of poor air quality. Where it is identified that a scheme will increase emissions within the Air Quality Management Area measures will be required to mitigate such increases. These could include: Travel Plans; through design, e.g improved air flow around development, or alternative plant; reducing the number of car parking spaces; allocated parking for car clubs/ low emission vehicles; provision of electric charging bays or low emission fuelling points; provision of cycling facilities / residents cycles; improvements to local public transport. As set out in the accompanying text to Policy DM19 in some circumstances it may be appropriate for a developer to fund mitigating measures elsewhere. This would be to offset any increase in local pollutant emissions resulting from the proposed development. This may involve a specific scheme or a contribution to the costs of the monitoring network.
- 8.8 All such contributions will be considered on a case by case basis and will need to meet the relevant legal tests for obligations as set out in paragraph 2.1 above and in light of viability considerations.

Appendix 1: Worked Examples of Education Contributions for New Build

The formula used to calculate a contribution is:

Pupil product x average cost per place

- The Pupil Product is as set out in Tables 5 and 6.
- The average cost per place £7,763 (based on the 'gap' between cost per place Government funding and Council borrowing).

Contributions sought for development of new houses:

| Dwelling Size | Total |
|----------------------|---------|
| 2-bed house | £6,366 |
| 3-bed and over house | £11,334 |

Contributions sought for development of new flats/apartments:

| Dwelling Size | Total |
|---------------------|--------|
| 2-bed flat | £2,795 |
| 3-bed and over flat | £5,667 |

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ENVIRONMENT, CULTURE AND SPORT

| | | | |
|------------------|--|--------------|--|
| TO: | Strategic Environment, Planning and Transport Committee | | |
| DATE: | 9 th July 2013 | AGENDA ITEM: | 10 |
| TITLE: | SUPPLEMENTARY PLANNING DOCUMENT: AFFORDABLE HOUSING REPORT OF CONSULTATION AND ADOPTION | | |
| LEAD COUNCILLOR: | CLLR TONY PAGE | PORTFOLIO: | STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT |
| SERVICE: | PLANNING | WARDS: | ALL |
| LEAD OFFICER: | KIARAN ROUGHAN | TEL: | 0118 9374530 |
| JOB TITLE: | PLANNING POLICY MANAGER | E-MAIL: | kiaran.roughan@reading.gov.uk |

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 The purpose of the report is to provide the results of consultation on the draft Supplementary Planning Document (SPD) on Affordable Housing that was approved by Cabinet in November 2012 and to seek adoption of the revised SPD document. The SPD is a significant update to the Affordable Housing section of the existing Planning Obligations Supplementary Planning Guidance (SPG) (adopted September 2004). It sets out how relevant affordable housing policies in the Reading Borough Local Development Framework (LDF policies: CS16 (Affordable Housing), CS13 (Impact of Employment Development, DM6 (affordable Housing and DM7 (Accommodation for Vulnerable People)) can be met in the current financial, legislative and operational environment for the provision of affordable housing. A copy of the revised SPD is attached as Appendix 2 to this report.

2. RECOMMENDED ACTION

- 2.1 That Committee notes the results of the consultation undertaken during November and December 2012 on the Draft Affordable Housing Supplementary Planning Document and approve the recommended Council Responses;
- 2.2 That Committee adopts the revised Affordable Housing Supplementary Planning Document (Appendix 2 to this report).

3. POLICY CONTEXT

- 3.1 The Council has existing Supplementary Planning Guidance (SPG) on Planning Obligations, adopted in 2004. This SPG includes a section on Affordable Housing. It provides guidance on the interpretation and implementation of policies in the Reading

Borough Local Plan (1998) that sought the provision of affordable housing on sites of 15 or more dwellings, and in relation to major commercial developments.

- 3.2 The Reading Borough Core Strategy (adopted in 2008) built on the existing local plan policy on affordable housing for sites providing 15 dwellings or more (Policy CS16). Policy CS 13 of the Core Strategy also seeks that employment development mitigate its impacts on increasing pressure for housing in the Borough through the payment of contributions towards the provision of affordable housing.
- 3.3 The Sites and Detailed Policies Document was found sound in August 2012, following an examination and a subsequent assessment of its contents against the NPPF. It was adopted by the Council on 23rd October 2012. It contains policy DM6 which requires developments of 1-14 dwellings to provide affordable housing in accordance with differing targets depending on the size of the site. It also contains policy DM7 which seeks the provision of accommodation for vulnerable people.
- 3.4 The use of section 106 agreements will change once the council adopts a CIL (Community Infrastructure Levy) charging schedule (a preliminary draft Charging schedule was approved by Cabinet in March 2013 and was the subject of consultation during March and April 2013). Most developer contributions towards infrastructure will then be made under the CIL regime. However, Section 106 agreements will remain primarily to facilitate the provision of affordable housing. Revised guidance is therefore needed to reflect the up to date policy and operational position relating to the provision of affordable housing as part of planning proposals.
- 3.5 The draft Supplementary Planning Document (SPD) on Affordable Housing was approved for consultation by Cabinet on 5th November 2012. Consultation was undertaken during November and December 2012 with information being posted on the Council's website and sent to all consultees on the Planning Policy database. Officers also made themselves available to discuss the draft SPD with interested parties. Some contact has also been made with planning agents who represent smaller developers who will be affected by the new policy DM6.

4. THE PROPOSAL

a) Statement of Consultation

- 4.1 A total of 10 letters of representation on the SPD were received, mainly from consultants and agents representing major landowners and developers. A number of the representations are very detailed, covering all parts of the document. The more detailed comments have led to a thorough review of the draft SPD. The representations cover the following main points:
 - The SDP is not in accordance with the NPPF and does not meet the tests for planning obligations set out in the Community Infrastructure Regulations;
 - Definitions of affordable housing in the draft SPD do not accord with those in the NPPF and other government policy and guidance;
 - The council's evidence base on housing need is flawed and has not been properly tested. It fails to demonstrate why family housing is a priority;
 - The policy should apply to the net increase in dwellings not the gross number. The requirements for calculating provision on the gross number of houses is inconsistent with the approach in the draft SPD in respect of flats which is calculated on the basis of the net additional number of units;

- The Council should not be seeking contributions towards affordable housing provision as part of employment developments;
- Various technical issues on the methodology for assessing viability set out in the draft SPD;
- Complaints that the policies in the LDF and the requirements of the SPD inevitably require a viability assessment to be submitted for all major and minor applications which is costly and time-consuming;

4.2 A separate Appendix 1 to this report (which is available with the Agenda papers on the RBC website) contains a Statement of Consultation that provides a schedule summarising each representation and a recommended Council response to each representation. Committee is recommended to note the representations and to approve the recommended Council Responses.

b) Option Proposed: Revised Affordable Housing Supplementary Planning Document

4.3 As a result of the consideration of the various representations, a number of small changes and refinements have been made to the draft SPD to make it more concise and to add clarity. No significant changes are made to the main requirements which in any case flow from the adopted policy, although they do have to be interpreted in the light of more up to date government policy as set out in the NPPF. The requirements/ guidance in relation to viability have been significantly revised to take on board points about making the information required clearer and simpler, particularly for small sites. This also takes account of recently published government guidance on the review and appeal of Section 106 Affordable Housing Requirements which contains some guidance on the requirements for testing viability assessments in relation to planning proposals.¹ Other main changes include:

- The provision for flat conversions to be calculated on a net addition basis is deleted as a lot of parties felt that it was inconsistent with the insistence on gross development otherwise;
- More detail and a methodology have been added to explain how CS13 on employment works in terms of affordable housing contributions.

A separate Appendix 2 to this report contains the Draft SPD that is now recommended for adoption (A track changes version of the SPD as approved by Cabinet in November 2012 is also available on request).

4.4 In the current economic circumstances, the viability of development is challenging. That raises difficulties for developers in meeting planning policy requirements and aspirations. Through the NPPF, the government has raised the importance of viability in the consideration of planning applications. Inevitably viability is a prominent and complicated issue in considering many applications and the need for such assessments has grown with the adoption of Policy DM6. It is accepted that resolving the issue of viability is resource intensive and involves some cost to all parties but there doesn't seem to be any reasonable way around it. The Revised SPD sets out a refined list of standard information requirements that applicants should submit within their viability appraisal. It is hoped that this will further help to reduce the work involved for both applicants in preparing appraisals and the council in assessing them. The document

¹ DCLG, Section 106 affordable housing requirements: Review and appeal, April 2013.

also makes provision for phased and deferred contributions, again taking account of the current economic conditions.

c) Other Options Considered

(i) Do nothing

- 4.5 The existing SPG no longer provides adequate guidance to guide development within the adopted policy and operational framework that exists in 2012. The existing SPG does not provide any guidance in the interpretation or implementation of Policy DM6. The absence of any further guidance would lead to a lack of clarity in the interpretation and implementation of current adopted planning policies on affordable housing provision and lead to a need for additional, costly negotiation in determining planning applications.

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 The adoption of the Affordable Housing SPD will contribute to achieving the Council's following strategic aims, through providing affordable housing as part of residential development and relevant employment development within the Borough:

- To develop Reading as a Green City with a sustainable environment and economy at the heart of the Thames Valley;
- To establish Reading as a learning City and a stimulating and rewarding place to live and visit;
- To promote equality, social inclusion and a safe and healthy environment for all.

- 5.2 In addition the Affordable Housing SPD will support the implementation of both the Council's Housing Strategy and planning policy as set out the Reading Borough Local Development Framework.

6. COMMUNITY ENGAGEMENT AND INFORMATION

- 6.1 Public consultation was undertaken for a period of 6 weeks during November and December 2012. This consultation involved sending out consultation letters and emails to relevant parties on the LDF team's consultation database to include government departments, adjoining local authorities, developers and agents, other users of the planning system and local interest groups. The consultation was also advertised via the RBC website.

7. EQUALITY IMPACT ASSESSMENT

- 7.1 In drafting the draft Affordable Housing SPD and in planning the consultation on the draft document, the Council has had regard to the general equality duty imposed by the Equality Act 2010 (S.149). This requires public authorities, in the exercise of their functions, to have due regard to the need to eliminate discrimination, harassment and victimisation etc.; to advance equality of opportunity between people who share a relevant protected characteristic and people who do not; and to foster good relations between people who share a relevant protected characteristic and those who do not.

- 7.2 The Council has carried out an Equality Impact Assessment, and considers that the process of adopting and the operation of the SPD will not have a direct impact on any

groups with protected characteristics. The Scoping Assessment, included at Appendix 3 (attached) identifies that an Equality Impact Assessment (EqIA) is not relevant to the SPD as it will apply to all applicants for planning permission and all developers of relevant schemes. While the provision and allocation of affordable housing has implications for many groups and communities in Reading, there is no evidence that the operation of SPD will have a direct impact on any groups with protected characteristics.

8. LEGAL IMPLICATIONS

- 8.1 Once adopted, the Revised Supplementary Planning Document (SPD) will be a material consideration when determining planning applications. It will be afforded maximum weight given that it has been prepared in accordance with the current national guidance and regulations, including being the subject of comprehensive consultation. It should be noted that an SPD is not able to make policy and can only provide additional guidance on existing adopted policies contained within the Development Plan. It will replace the section on affordable housing in the existing Planning Obligations SPG adopted in September 2004.

9. FINANCIAL IMPLICATIONS

- 9.1 The costs of drafting, consulting on and administering the adopted SPD have been undertaken within existing budgets.

Value for Money

- 9.3 The adoption of the SPD will ensure that the Council maximises developer contributions of affordable housing and, on the basis that the Council has the means to recoup administration costs, represents value for money.

Risk Assessment

- 9.4 There are no financial risks associated with producing the SPD or undertaking community involvement on the SPD. The SPD will assist the Council in negotiating for the provision of affordable housing and/or financial contributions towards such provision. It is arguable that the absence of an SPD providing such guidance would make the negotiation of such provision more difficult.

10. BACKGROUND PAPERS

- Planning Act 2008;
- Localism Act 2011;
- National Planning Policy Framework (DCLG), 2012;
- DCLG, Section 106 affordable housing requirements: Review and appeal, April 2013
- Reading Borough Council Supplementary Planning Guidance: Planning Obligations under Section 106 of the Town and Country Planning Act 1990, Final SPG (2004);
- Reading Borough Council LDF: Core Strategy (Adopted, 2012);
- Reading Borough Council LDF: Sites and Detailed Policies Document (Adopted, 2012);
- RBC, Housing Strategy, Firm Foundations: Housing Strategy 2009-2014, 2009

Appendix 2

Copy of the Draft Affordable Housing Supplementary Planning Document.

APPENDIX 2: EQUALITY IMPACT ASSESSMENT

Provide basic details

Name of proposal/activity/policy to be assessed:

Directorate: ENCAS - Environment, Culture and Sport

Service: Planning and Building Control

Name: Affordable Housing Supplementary Planning Document

Job Title: Date of assessment: 26/06/13

Scope your proposal

What is the aim of your policy or new service?

To provide guidance to developers and other stakeholders on the implementation of policies in the Council's Local Development Framework that seek the provision of affordable housing as part of residential and major commercial proposals.

Who will benefit from this proposal and how?

All developers will benefit as the SPD will set out how the relevant policies will be operated. The community of Reading will benefit from the provision of affordable housing as part of development proposals in the Borough, contributing towards mixed communities and to meeting the needs of households who cannot afford housing at open market prices.

What outcomes will the change achieve and for whom?

The SPD will enable the Council to continue to successfully achieve the provision of affordable housing as part of private development proposals and thus contribute to providing for the need for affordable housing in the Borough.

Who are the main stakeholders and what do they want?

All developers and the public. Developers want certainty over relevant costs to apply in bringing forward development proposals. Other stakeholders want to ensure that the Council uses all measures available to secure affordable housing to meet the identified needs in the Borough. The affordable housing provided may serve to assist particular groups within the community who need particular facilities as part of their accommodation (e.g. units specifically adapted for disabled people).

Assess whether an EIA is Relevant

How does your proposal relate to eliminating discrimination; promoting equality of opportunity; promoting good community relations?

Do you have evidence or reason to believe that some (racial, disability, gender, sexuality, age and religious belief) groups may be affected differently than others? (Think about your monitoring information, research, national data/reports etc)

Yes No

Is there already public concern about potentially discriminatory practices/impact or could there be? Think about your complaints, consultation, feedback.

Yes No

If the answer is Yes to any of the above you need to do an Equality Impact Assessment.
If No you **MUST** complete this statement.

An Equality Impact Assessment is not relevant because the SPD will apply to all developers, and the level of provision will be based on the size of the proposed scheme. There is no evidence that any group will be treated differently. The output of the policy will be the provision of affordable housing, for which there is no evidence or belief that any group would be treated differently. Decisions on the provision of affordable housing will also be made having regard to the general equality duty imposed by the Equality Act 2010 (S.149).

Reading Borough Council

Draft Affordable Housing Supplementary Planning Document

Report of Consultation

Summaries of Representations and Recommended Council Responses

July 2013

Draft Affordable Housing Supplementary Planning Document: Report of Consultation

A draft Supplementary Planning Document (SPD) on Affordable Housing was approved for consultation by the Council's Cabinet on 5th November 2012. Consultation took place during November and December 2012 with the deadline for the submission of comments being set as 21st December 2012.

Reading

| Draft Affordable Housing Supplementary Planning Document Summaries of Representations and Recommended Council Responses | | |
|--|--|--|
| Respondent | Issue/Suggestion raised by Respondent | Council Response |
| QUOD on behalf of Sackville Developments (Reading) Limited. | National Policy and Regulatory Changes. National policy changes have occurred since the Council adopted its Core Strategy in 2008. The background in the SPD fails to recognise principles in the NPPF in relation to the presumption in favour of sustainable development and the need for an up to date evidence base. It should also reflect that the key test for SPD in the NPPF is that they should not be used to add unnecessarily to the financial burden on development. | Noted and disagree. The situation in relation to the changed national policies and the publication of the NPPF is reflected in the Sites and Detailed Policies Document through Policy SD1 which was inserted at the request of the Inspector and avoids any doubt about whether the LDF complies with the presumption in favour of sustainable development. |
| | The Background also needs to properly reflect the 2010 Community Infrastructure Regulations and the tests of an obligation set out in regulation 122. | Partially agree. One assumes that national policy on the provision of affordable housing complies with planning regulations. In accordance with national policy, the provision of affordable housing is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Background will also make reference to compliance with CIL regulations. |
| | Viability. In paragraph 4.43, the reference to “officers will be prepared...” should be replaced by, “The Council will be prepared...” to reflect the fact that this is the council’s planning policy and that this is the approach of the council. | Agreed. |
| | Paragraphs 2.2 and 4.2 need to make reference to consideration of individual, site-specific circumstances and development viability, to | Partially agreed. Paragraph 2.2 deleted to reduce unnecessary context. In any case, |

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| | ensure an appropriate level of flexibility is applied and development viability is not prejudiced. | paragraph 6.29 of the explanatory text in the Core Strategy refers to sensitivity to exceptional costs and to up to date planning policy. Paragraph 4.2 simply restates the policy wording. Issues related to flexibility and viability are dealt with adequately elsewhere in the SPD. |
| | Paragraph 4.3 and the application of an affordable housing requirement on residential development that does not provide a net increase in the number of dwellings, is flawed and inconsistent with Regulation 122. It is not clear how an obligation towards the provision of affordable housing can be substantiated where no additional dwellings are provided. | Partially accept. Policies CS16 and DM6 are based on housing need and the desirability of creating mixed and sustainable communities. A reduction in the number of affordable dwellings within a site simply because of existing open-market housing stock within the site would fail to achieve this aim and result in a shortfall of affordable housing. It is accepted that the reference to allowing for net additions in relation to flat conversions in paragraph 4.44 may be contradictory as for other residential developments, the policy relates to the gross additions. This is considered separately, but as a result, reference to net additions of flats is deleted. |
| | The use of the term “existing use value” is inconsistent with best practise and the latest RICS Guidance Note - <i>Financial Viability in Planning (April 2012)</i> . Any reference to ‘land value,’ ‘purchase price’ or ‘existing use value’ should be replaced by ‘benchmark land value.’ | Not accepted. This is independent guidance, not government policy. There appear to be conflicts in this guidance with advice of The Local Housing Delivery Group on EUV or CUV. At the moment, it appears that the use of the term ‘existing use value’ is not incorrect. |

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| | | <p>See: http://www.pas.gov.uk/pas/core/page.do?pageId=575110#contents-3 DCLG publication in April 2013 on Section 106 affordable housing requirements uses the term market value and provides a more detailed explanation that will be referred to in the SPD guidance on viability assessments.</p> |
| | <p>Affordable Housing Definition and Delivery. The definitions of affordable housing in paragraphs 4.10 and 4.19 of the draft SPD are inconsistent with the definition provided in paragraph 4.19 of the NPPF. Amend to read: “Affordable housing must shall <u>should include provisions to remain at an affordable housing price for successive generations of future eligible households in recognised housing need. or for the subsidy to be recycled for alternative affordable housing provision.</u>”</p> | <p>Accepted. Will include NPPF reference for the definition of affordable housing in its glossary, i.e.: “<i>Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</i>”</p> |
| | <p>The draft SPD seeks to set a preference for social rented accommodation. However nationally, Councils and Registered Providers are being actively encouraged to provide affordable rented units to maximise their rental revenue streams and affordable housing delivery. Contradictory positions also presented around the delivery of social rent vs. affordable rent (i.e. paragraphs. 4.14 and 4.16). The draft SPD should not be advocating social rents, but rather should conform with the provisions set in the NPPF and the HCA’s 2011-2015 Affordable Homes Framework, which states that social rent provision will only be supported in limited circumstances, e.g. estate regeneration schemes.</p> | <p>Not accepted. The policy relates to identified needs in the local area and local preferences to meet local priorities. Social or target rent accommodation remains a substantive part of that need and is a priority for the most vulnerable households. SPD embraces other tenure types, Affordable Rent and Intermediate housing and is therefore in accordance with NPPF. The policy on housing does not have to conform</p> |

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| | | with the HCA framework; that is a framework for HCA support and funding. Our understanding is that the HCA are not likely to be involved in funding Section 106 sites and will therefore have little or no involvement |
| | Paragraphs 4.25 to 4.27 set the Council's expectations concerning the conversion of existing social rented units to affordable rented units. This is not a matter that the draft SPD can influence but is something that a local authority must set out in their Tenancy Strategy. As registered providers are only required to have due regard to this policy, we consider that paragraphs 4.25 - 4.27 are wholly irrelevant and should be deleted. | Not accepted. This is for information to provide clarity for applicants. It is taken from the Council's Tenancy Strategy. The Council believes that applicants should be aware of it in making their proposals as it may have an impact on values. However, information has been moved to an appendix. |
| | Paragraph 4.20 seeks to prescribe the title terms governing the transfer of the affordable units to a registered provider. This is immaterial and not a planning issue. The proper application of the definition of affordable housing as set out in the NPPF appropriately secures any affordable housing. This paragraph should be deleted. | Not accepted. This provision is fundamental to the delivery of the affordable housing and compliance with the planning policy and the NPPF. The local planning authority is entitled to know and to have some control over how the affordable housing is provided and how it will remain at an affordable price for future eligible households. The definition in the NPPF states: " <i>Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</i> " The council understands that financiers are not happy with restrictive |

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| | | clauses in agreements, which is the only alternative where a registered provider is not involved. Reference to this alternative option will be added for clarity and to allow for housing to be provided by a non- registered provider. |
| | Paragraph 4.23 does not provide the applicant with the ability to claw back any contributions paid to the local authority, which has not been spent within any prescribed timeframe as set within a Section 106 agreement to ensure the contribution satisfies the test set by Regulation 122 and in accordance with DCLG Planning Obligations: Practice Guidance. | Not accepted. That is a legal provision that may be dealt with in the agreement at the behest of either partner. It does not affect the granting of planning permission which is the purpose of the SPD. It is not referred to in the policy and does not need to be referred to in an SPD. |
| | Paragraphs 4.28 and 4.29 seek to introduce a new policy in relation to the design standards applicable to affordable housing, which are not contained in the Core Strategy. These paragraphs should be deleted. | Partially accepted. 4.28 refers to design standards in accordance with Core Strategy policy CS7. References to other relevant policies (e.g. policies DM4, 5, 10, etc. will be added). Wording in relation to HCA standards will be amended. Paragraph 4.29 relates to the situation where the Council is persuaded to allow provision on a surrogate site. It is intended to be helpful to applicants in the interpretation of the text that accompanies the policy. |
| | Seeking Affordable Housing for employment floorspace. There is no clear up to date evidence to demonstrate a link between employment and additional housing need, particularly for affordable housing. In this respect we consider that obligations seeking affordable housing from | Not accepted. Background evidence to the Core Strategy pointed to a large and growing gap between jobs and residents that will result in pressure on transport and housing. |

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| | employment development fail, most if not all, of the Regulation 122 tests. | More recent data and analysis suggests that the gap between jobs and those who are economically active continues to grow and that additional employment growth has unacceptable impacts that require mitigation. Policy requirement is necessary to support sustainable economic development. |
| | The downturn in the economy has resulted in a simultaneous fall in the number of jobs in Reading and a rise in the number of unemployed and economically inactive people. In 2011/12 there are around 1,700 more unemployed people and 3,900 more economically inactive people than there were in 2007 ⁱ . Reading now has 4,800 fewer jobs than it did in 2007 ⁱⁱ . This pool of labour, which amounts to 5,600 people ⁱⁱⁱ , could move back into employment without putting any extra pressure on the housing market (as these people already live in the local area). | Not accepted. This representation looks at a single indicator and what, it is hoped, is a relatively short term temporary phenomenon. In any case, as we come out of recession, new jobs will occupy the large areas of unused and underused office space in occupied office buildings as organisations start to rebuild staffing levels. It will not necessarily occupy newly developed floorspace. The plan and its policies are intended to cover the period 2006-2026 which was always going to cover the vagaries of economic cycles. See CS13 Background Paper for fuller recap of the justification for Policy CS13. More recent studies continue to support that justification. |
| | Underemployment has risen significantly as a result of the recession. An estimated 9% of all employees in the South East are in work but would like to do more hours or an additional job, up from 6.5% in 2005. Getting these people back into work in new employment development would not | Not accepted. The recession has led to high levels of short term working that will recede once the economy picks up. Much of this underused labour will be taken up within |

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| | put pressure on the housing market. | large areas of unused and underused office space in occupied office buildings as organisations start to expand staffing levels. It will not necessarily occupy newly developed floorspace. This will have little impact on the overall conclusion that the gap between jobs and economically active is growing and has unsustainable impacts. |
| | The increase in unemployment and economic inactivity means that Reading should be actively encouraging development that creates jobs. | Not accepted. Background evidence to the Core Strategy pointed to a large and growing gap between jobs and residents that will result in pressure on transport and housing. More recent evidence points to a labour and skills shortage remaining a significant issue. The policy seeks to implement a plan for growth in the period 2006 - 2026 that would inevitably occur over the economic cycle with periods of high growth and periods of low growth. It is accepted that the current economic circumstances have affected growth but all parties need to plan, in line with overall government policy on the basis that economic growth will return in line with forecasts. |
| | Seeking a commuted sum raises concerns about consistency in terms of compliance with Regulation 122. It is not clear how the Council could seek contributions which are 'fairly and reasonably related in scale and kind to the development'. There is no up to date empirical evidence to provide a | No accepted. Background evidence to the Core Strategy pointed to a large and growing gap between jobs and residents that will result in pressure on transport and housing. |

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| | means of calculating the impact (and therefore mitigation in the form of contributions) on affordable housing provision. | More recent evidence points to labour and skills shortage remaining a significant issue. This demonstrates that new employment development increases the labour shortage, some of which must inevitably be made up through the provision of additional housing, particularly affordable housing. More recent studies continue to support that justification. |
| | Pooling of contributions for the purposes of Affordable Housing would also fall foul of the CIL Regulations because it could not be shown that the contributions are directly related to the individual development proposals. | Not accepted. Not altogether clear what this representation is saying. Any contribution will provide subsidy to the provision of affordable housing units off site. Fail to see that pooling would apply to affordable housing provision. |
| | The Council should not pursue seeking affordable housing contributions pursuant to policy CS13 of the Core Strategy. Doing so is contrary to the NPPF (particularly para.153) and the 2010 CIL regulations. | Not accepted. Major employment development without mitigating impacts on labour and skills shortages, transport and housing, is not sustainable. Applications failing to provide such mitigation should not, therefore, receive planning permission. Additionally, this SPD is not an opportunity to question or alter the policy itself. CS13 specifically refers to affordable housing and this document is merely interpreting the adopted development plan policy. |
| Barbara Morgan, Network Rail | The Affordable Housing Planning document should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to | Not accepted. Rail Infrastructure is not a matter dealt with or relevant to the SPD on Affordable housing. |

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| | existing rail infrastructure. | |
| Drivers Jonas Deloitte on behalf of LaSalle Investment Management | <p>We consider that there is a far from straightforward relationship between the provision on new employment floorspace in an area and the creation of demand for additional housing. Therefore, we consider that the approach to determining payments in lieu of affordable housing set out in the SPD is overly simplistic and inappropriate.</p> <p>The relationship between homes is intended to be addressed in the development plan which should allocate sufficient land for jobs and homes to meet the growth objectives of the Borough. Although additional land may go in to employment use through changes of use and redevelopment, at the same time sites will fall out of employment use and be reused for residential. As such, the overall relationship between the two land uses will be constantly changing and it is too simplistic to assume that all new employment development (above the thresholds set in the policy) will lead to an increased demand for housing, including affordable housing.</p> | <p>Not accepted. The Council's Core Strategy was based on evolving national and regional policy which designated Reading as a regional growth point and hub with no ceiling on employment growth. The strategy of unrestrained economic growth is embraced in the Core Strategy despite the fact that there was already a considerable mismatch between jobs and the economically active population. In recognition of the potential impacts and unsustainable consequences of unrestrained economic growth, policies are framed to provide for mitigation of the inevitable impacts of such economic development particularly on skills, transport and affordable housing. Without such mitigation, unrestrained economic development is not sustainable, and restraint policies would be necessary to limit employment growth in balance with housing provision.</p> |
| | Therefore, it is only net additional employment floorspace on a site that should be considered as possibly needing to make a payment towards affordable housing. | Largely accepted. Mitigation of impacts will normally be applied to the additional employment on a site so allowance would normally be made for existing employment/ floorspace. Paragraph 4.4 provides guidance |

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| | | that refers to the net increase in employment numbers. Will add reference this being potentially based to a net increase in floorspace. Provide a worked example of how it would be calculated. |
| | The new floorspace will not necessarily be occupied by companies who are new to Reading. Often a major occupier will relocate from another premises in the town, thus simply transferring all their additional staff across. These staff will already have homes in the Borough or elsewhere and there is no reason why any stimulus to housing demand will occur. | Not accepted. The provision of new floorspace adds to the stock of employment floorspace and introduces impacts that need to be mitigated. For movements within the Borough, existing vacated premises will be re-used for employment generating uses. |
| | Where a company occupying a new building is new to the Borough, it will not necessarily bring in new staff from other areas. It may do, and this will create some new housing demand. However, it may also recruit staff from the local area who already live locally. Staff will leave one local job to take another, or may be currently unemployed but living locally. | Not accepted. Sustainable development means that the impacts of development are fully mitigated. Additional employment leads to impacts that need to be mitigated. When people move jobs, they leave posts that need to be filled so it remains a net addition to the employment numbers. |
| | All of the above points illustrate that for many reasons there is not a direct correlation between the creation of new employment floorspace and increased demand for housing, including affordable housing. Therefore, the employment impact statement requested by the draft SPD will be extremely difficult to prepare with any degree of accuracy. This will be further complicated by the fact that at the application stage when the employment impact statement is required, many developers will not know who the occupiers of the proposed buildings will be (unless it is a bespoke build for a known occupier). For these reasons we feel that the employment impact statement will be a rather meaningless exercise in | Not accepted. The required impact statement is seeking the provision of an assessment of the likely impact of the proposal and for a proportion of that impact to be mitigated through a contribution towards the provision of affordable housing. As indicated in the responses above, who occupies is not particularly relevant as the additional floorspace provides for increased employment in the borough, adding to the |

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| | terms of predicting how labour may be sourced and the consequent impact on housing. | employment gap and the impacts of unrestrained employment growth. |
| | The Core Strategy Policy CS13 states that employment development should provide mitigation in line with its impacts on the demand for housing. Therefore, it is very important that there is either a clear and robust method for calculating this impact, or that it is acknowledged that there is not a clear and robust method for calculating this impact at the application stage (and particularly in the absence of actual occupiers), and that therefore that the policy should be applied with caution and flexibility. We consider that the latter is the accurate position and should be adopted in this case. | Not accepted. The methodology measures the change in employment arising from the proposed development and seeks a contribution towards mitigating the impacts of the increase in employment, solely in terms of a contribution towards affordable housing. Paragraph 4.4.and Appendix 2 provide an example. |
| | It should be noted that planning obligations should only be sought where they meet all of the NPPF tests (NPPF paragraph 204). | Noted. In principle the requirements of this development plan policy will lead to an obligation that is necessary, directly related and fairly and reasonably related, depending on the individual circumstances of the proposal. |
| | As stated in the National Planning Policy Framework at paragraph 173: In this case the relationship to the need for affordable housing is tenuous and the method for calculating an appropriate contribution is fraught with difficulties. As such, we consider that it is essential that the draft SPD acknowledges these factors and includes text explaining that: <ul style="list-style-type: none"> • the Council will take a flexible and cautious approach and apply the policy to only those schemes where some additional housing demand seems likely; • Any contribution sought will be subject to viability testing to ensure that it does not threaten the viability of any development; • The trigger for any obligation is the point of occupation of the | Not accepted. Evidence base to the policy and more recent evidence points to a large gap between the level of employment and economically active. The Council is always willing to negotiate and the SPD reflects this along with provisions for viability testing and flexibility over triggers for payments of contributions as appropriate. |

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| | building when the impacts will occur. | |
| <p>Mark Edwards, Nimbus Property Developments Ltd</p> | <p>Paragraph 3.2 - Why was the figure of £60,000 chosen, given even in today's market a person could easily achieve a mortgage of £210,000 which would afford a 3 bedroom house in some parts of Reading. If this higher income figure, was reduced then 1240 household needs would be reduced. Using RBC's own figures [2006-2026 Sites and Detailed Policies Document Housing Trajectory (table)] the 40% would be eradicated within 3 years. Clearly the aspirations and the reality are not synchronised, as this would be impossible to do. The Planning Committee's chairman reflected this in his speech on the 23rd October 2012 at the adoption and inception of the DM6/11 policies. This then means that Viability appraisals are the key moving forward, or a different method of calculation should be looked at. I comment on both of these points in greater detail.</p> | <p>Partially accepted. Reference to £60,000 is deleted although this figure represents about the level of h/h income needed to be able to afford to purchase on the open market in the Borough. Private rented accommodation can offer accommodation to lower levels of income. However, high levels of household income are required in the South East where relatively high income h/h may have housing needs due to affordability. Yes h/h can borrow large sums to buy but the need for large deposits are currently a barrier. The figure also relates to a generally accepted view that housing costs should be no more than around 30-33% of net household income. DTZ HNA reports that Catalyst Housing Group is the Local HomeBuy Agent Catalyst keeps a register of households who are actively interested in intermediate housing options. To be eligible, households must have incomes of less than £60,000. The figure of 1240 h/h only relates to the number of applicants registering for intermediate products. These represent only a small proportion of the numbers identified as in need of housing. A lot of this detailed context information has now been deleted</p> |

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| | | from the document. |
| | <p>Paragraphs 4.32 and 4.33: The number gleaned for percentage based on units are from the height of the housing boom in 2007. The draft concedes contrasting this with 2009, the targets will be less easy to achieve, yet still these are the targets, meaning once again RBC and the developer will require viability appraisals which means more red tape and more adversarial posturing (see note about my own viability appraisal later). None of this is good for either side, and will almost certainly mean more and more appeals going into the Planning Inspectorate where a Planning Inspector will make the decision. This means yet more cost, delay and less housing (and as a consequence less affordable housing).</p> | <p>Not accepted: These paragraphs are taken from the adopted policy which has been subject to consultation and examination and which is now the legal basis for determining planning applications. The plan is designed to apply up to 2026 and is written to account for the ups and downs of economic cycles. Government guidance has elevated the importance of viability and a by-product is, inevitably, more complexity and the need for viability appraisals. Appeals are a part of the planning process.</p> |
| | <p>While the SPD points to 2009 as being the low point of the market, costs are increasing while prices are not and margins are therefore being squeezed even more in current circumstances with little prospect of improvement. This means that under the policy, every application for housing will have to be subject to viability appraisal which means more red tape and more adversarial posturing (and appeals).</p> | <p>Noted. See above.</p> |
| | <p>The Draft SPD states that commuted sums should be garnered from Gross Development Value (GDV). However, GDV does not take account of a site being brownfield or in a Conservation Area or in a low value area, which affects costs. This again means that a viability appraisal is needed.</p> | <p>Noted: The inevitable consequence of national planning policy (in the NPPF) making viability a central consideration of the planning process is that viability appraisals will be needed to deal with the differing circumstances affecting individual sites.</p> |
| | <p>At a current appeal, the Council's Valuer is putting in values that vary from the information set out in the Council's evidence submitted to</p> | <p>Noted: Inevitably, values will now be different as the evidence submitted to</p> |

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| | justify policy DM6. | support policy DM6 is now over 2 years old. Viability evidence becomes out of date very quickly in line with changes in sales values, building and other costs, etc. This is a further reason why individual viability appraisals are likely to continue to be needed in relation to individual planning applications. |
| | <u>A fairer way?</u> A more equitable way would be cap a developer's profit and go open book at the end to reclaim affordable housing. For example, if there was a cap of 16% on developer profit (less than the 20 to 25% wanted by some developers) but de-risked. The developer would always get that before affordable housing contributions. The council would then get any profit above that up to 5% (i.e. anything between 16% and 21%). Quotes the example of MUSE, a large development that can only afford 5% affordable housing contribution. This had covenants that only kick in once the 16% profit is realised. | Not accepted?? This would not be in accordance with national policy. However, as indicated, Reading Borough Council has been and remains willing to negotiate over requirements and to reach reasoned agreements on how provision might be made in the current difficult economic circumstances. |
| | RBC should look at Swindon's and High Wycombe's policies. These are more advanced and are more developer friendly. | Not accepted: The current policies of these authorities are certainly less ambitious in terms of their targets for provision, but one cannot say that they are more advanced, or even particularly different to the RBC policies. The policies of both those other authorities are now quite old and one could argue do not accord with current government policy with the publication of the NPPF. |
| Paul Bardos. | I would say that I think the requirement for affordable housing on small | Noted. |

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| | sites seems very onerous... | |
| University of Reading - submitted by Barton Willmore. | Where planning obligations are sought, they should meet the 3 requirements of the Infrastructure Levy regulations set out in Regulation 122. The representations made on behalf of the university demonstrate that the SPD cannot meet these tests. | Disagree. One assumes that national policy on the provision of affordable housing is compatible with planning regulations. In accordance with national policy, the provision of affordable housing is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. |
| | Paragraph 4.3 confirms that the Council will seek AH on the basis of the gross increase in housing. However, perversely, paragraph 4.4 accepts that for conversions to flats, the council will seek AH on the basis of the net increase in housing. | Partially accept. Policies CS16 and DM6 are based on housing need and the desirability of creating mixed and sustainable communities. A reduction in the number of affordable dwellings within a site simply because of existing open-market housing stock within the site would fail to achieve this aim. It is accepted that the reference to allowing for net additions in relation to the advice on flat conversions in paragraph 4.44 of the draft SPD may be inconsistent and contradictory. This is considered in more detail below. Paragraph 4.44 will be removed. |
| | The SPD cannot refer to gross numbers on site as this does not form part of either policy CS15 did they refer to the wrong policy?? or DM6. The university consider that the calculation should be based on the net increase in housing. | Not accepted. This is not correct. Policy CS16 specifically refers to " <i>the total number of dwellings</i> ". |

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| | The Regional Strategy expresses dwelling requirements in the form of net additions, and policy CS14 of the Core Strategy would be read in that context. Policy CS 17 refers to no net loss of residential dwellings. The Council's Annual Monitoring Report considers the net increase in dwellings. CS16 should be read in the same context as the development plan as a whole and the NPPF and should relate to additional net dwellings. | Not accepted. Affordable housing is not about overall numbers but about mixed and balanced communities. This is measured in terms of proportions of the total numbers of properties on a site. |
| | Refers to a current planning application at Wells Hall. | Noted Application recently approved. |
| | Policy CS 15 (it should read CS16), is premised upon a calculation of the amount of additional dwellings which needs to be provided in the form of affordable housing. The Housing needs Assessment, 2007, identifies a net shortfall of affordable units. | Not accepted. See above. |
| University of Reading - Notes on viability prepared by Haslams and submitted by Barton Willmore. | Viability. NPPF emphasises deliverability providing competitive returns to willing landowners and developers. It is essential that the SPD recognises the fact that sites will not be released for development unless they are both viable and deliverable in accordance with paragraph 173 of the NPPF. | Noted: The policies were formulated, subjected to consultation and examination and adopted in the light of viability appraisal and provisions in government guidance. Applications are determined in accordance with adopted policies. |
| | Paragraph 4.32: add the words, " <u>and will continue to be</u> " after the words, "In addition, the council has been" | Accepted |
| | Paragraph 4.33: add the words, " <u>where development viability was not an issue.</u> " at the end of the second sentence as the targets depend on development viability not being an issue. | Not accepted. Viability is only one of many material considerations in the determination of an application, albeit it is one with |

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| | | increasing importance. Additionally, both the policy and NPPF already provide an appropriate way for this matter to be fully considered. |
| | Paragraph 4.34: add the words, “ <u>and landowners,</u> ” after “...and the likely level of cost to developers” in the first sentence to ensure that it is in accordance with the wording in the NPPF. | Agreed. |
| | Paragraph 4.35: add the words, “ <u>there are abnormal development costs, high existing use values or where the landowner or developer would not receive “competitive returns”</u> ” after the words, “Where applicants can demonstrate, to the satisfaction of the council, exceptional difficulties in bringing a site to market.” These are factors that the council also needs to consider as they will affect the viability and deliverability of the proposed development. | Not accepted. Paragraph is concerned with sensitivity to exceptional site conditions and costs. The issue of competitive returns is a standard part of the viability assessment and a part of the test in the NPPF. |
| | Paragraph 4.36: add the following sentence to the end of the paragraph, “ <u>However, the Council recognises that the development viability of sites should be assessed on their individual merits on a case by case basis.</u> ” This will reflect that no two sites are the same. | Not accepted. That is essentially what the rest of the Section is saying. |
| | Paragraph 4.38: add the following sentences to the paragraph: Once the residual value produced by the proposed development is ascertained, the Council will then consider the competitive return required by the landowner. The Council will recognise that the return to the landowner should be at a level of residual land value sufficiently in excess of the site’s current use value in order to ensure that the landowner is incentivised to release their land for development.” This factor affects | Not accepted. The proposed phrase is irrelevant to this paragraph and, in any case, seeks to provide additional tests to those set out in the NPPF. In addition, DCLG have now published, “Section 106 affordable housing requirements, Review and appeal,” April 2013, The final version of the SPD will have |

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| | the viability and deliverability of proposed development. | regard to that guidance, in particular its viability test and the Annex on Viability Reappraisal which summarises potentially relevant key issues for a reassessment of viability, most of which are relevant for a first time viability assessment. The SPD will make further reference to the NPPF commentary on viability at paragraph 173 and following so that applications are considered in the light of that guidance. |
| | Paragraph 4.40: the words “in exceptional cases” should be deleted. Viability should be assessed in every case. | Not accepted. This paragraph is not specifically about assessing viability. It is about the Council being willing to be extra sensitive in a case where viability has been assessed and there is a justification for deferring provision. Additionally, the term ‘exceptional’ is used in paragraph 6.29 of the supporting text to policy CS16. |
| | Paragraph 4.41: add the following sentence to the end of the paragraph, <u>However, the Council acknowledges that the development viability of each site needs to be considered on a case by case basis, having regard to economic conditions at the time the planning application is considered.</u> This will reflect that no two sites are the same. | Accept. Similar wording added to paragraph 4.41. |
| | Paragraph 4.43: add the words, <u>“competitive returns to the landowner and/or developer, and,”</u> following “Therefore, subject to assessments of submitted viability <i>appraisals</i> ..” Unless both the landowner’s and developer’s positions are considered when assessing development | Partially accepted. Reference to NPPF wording on competitive returns, etc., added to paragraph 4.34. Viability appraisals include analysis of returns to the landowner |

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| | viability, the land may not be released for development or the development may not be undertaken. | and/or developer. Inevitably in assessing such appraisals, there will be discussion and negotiation around the issue of “competitive returns.” No need to add unnecessary wording. |
| | Paragraph 5.5 should be amended by adding the following wording to the beginning of the paragraph: <u>“Payment of contributions will only be sought upon commencement of development when it is financially viable to do so. When it is not viable to make payment contributions upon commencement of development, contributions will be paid at agreed later stages in the development, if at all.”</u> If the Council insists that payment of contributions are made upon the commencement of the development in circumstances where it would not be financially viable to do so, the development is unlikely to be delivered. | Not accepted. The paragraph is clear and provides adequate flexibility for the wording of agreements in the context of viability. |
| University of Reading - Representations on Affordable Housing prepare by Pioneer and submitted by Barton Willmore. | <p>Paragraph 2.6 refers to the 2007 Berkshire Strategic Housing Market Assessment (BSHMA) as a material consideration when interpreting Plan policies. However, it is suggested that this has been updated by the 2012 ‘Housing Need Assessment and Affordable Rent Review’ (“HNA”), so why does it remain a material consideration?</p> <p>The “HNA was not properly tested through the public examination process or subject to public consultation. Only preliminary information was presented to the Inspector.</p> <p>Required modification proposed</p> | <p>Not accepted. The main thrust of the argument is not accepted as detailed below. However, accept that documents do not need to be referred to in this paragraph so delete references along with other editing of Section 1.</p> <p>The HNA update to the BSHMA on affordable housing does not make the BSHMA no longer material. The update was commissioned by Housing Policy Officers and was used in the planning process as it provides more recent information and analysis in the context of the</p> |

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| | | <p>new product, Affordable Rent. It did not change the main, self-evident conclusion of the BSHMA, that there is a high level of need for affordable housing in Berkshire.</p> <p>The BSHMA and the Draft HNA were part of the evidence base that was available to the Inspector and to other participants who made duly made representations to the Sites and Detailed Policies Document. They were available on the Council's website. The final version made no material amendments to the draft version. There is no requirement for formal consultation of documents that make up the evidence base.</p> <p>Requested modification not accepted.</p> |
| | <p>Paragraph 2.9 should be amended as the target in policy CS16 has not been viability tested in accordance with the NPPF.</p> | <p>Not accepted: The SDPD Inspector's report was issued following consideration of the contents of the NPPF. While the NPPF provides for a whole plan focus for viability assessments, the adoption of both policies CS16 and DM6 was based on evidence that took account of the costs involved in developing sites in the Borough.</p> |
| | <p>Housing Need. Concern that the overall housing delivery targets for the Borough are insufficient to address the full objectively assessed housing requirements</p> | <p>Not accepted: Going forward, RBC will be preparing a new local plan which will examine objectively assessed needs. Policies</p> |

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| | of the area, particularly as the HNA does not provide an up to date assessment of market housing requirements. | in the Core Strategy provide for very high levels of housing provision compared to past rates of provision and do not limit housing coming forward on appropriate sites. Reading Borough is highly constrained, not least by its tight boundaries. |
| | The HNA has not been publicly consulted upon or prepared during the Plan making process thus enabling review during the Examination of the SDP DPD | Not accepted. As indicated above the updated HNA is part of the evidence base that supports policies in the local plan and it is not (and there is no requirement that it should be) the subject of separate consultation. |
| | The HNA is not an SHMA | Noted: HNA provides an update of the Section on Housing need in the original SHMA |
| | <p>Various concerns in respect of the modelling within the HNA including:</p> <ul style="list-style-type: none"> ▫The reliance on outdated income data. ▫The failure to review occupation trends when assessing newly forming household accommodation choices. ▫The acknowledged likely inaccuracy as a result of double counting households in newly arising need. ▫The failure to properly reflect the role of the private rented sector in terms of its ability to provide a supply of subsidised rented accommodation:- <ul style="list-style-type: none"> o this is despite evidence suggesting that a significant number of Housing Benefit claimants in Reading reside in the private rented sector. ▫The extremely limited assessment of subsidised rented dwelling size | <p>Noted and disagree: The HNA was part of the evidence base that, with other material, supported Policy DM6. DM6 is adopted policy. The Council is not aware of any other evidence since the HNA that would suggest that there is not a high level of need for affordable housing in the Borough or that the Policy is no longer relevant.</p> <p>Criticisms of the HNA are noted but, even where they could be shown to be relevant and to have a bearing on the outcome, they are unlikely to have a significant effect on the conclusions that a high level of need for affordable housing is evident in the Borough.</p> |

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| | <p>requirements:-</p> <ul style="list-style-type: none"> o in the absence of an up to date analysis of the dwelling size requirements of households in housing need it is entirely reasonable for developers to refer to the dwelling size profile set out in the HNA on the basis of the overall Housing Waiting List. This suggests that 83% of applicants are seeking 1 and 2 bedroom housing. ▫The lack of a detailed review of the number of households in affordable housing need and who can afford to resolve their housing requirements within Intermediate housing:- o a review of the income data, and the application of housing costs thresholds using the affordability test within the HNA to the modelled gross affordable housing need, followed by a comparison to the HNA Social Rented Intermediate housing supply, suggests that 85% of net affordable housing need is for Intermediate housing. | <p>Criticisms will be considered in preparation of any new SHMA undertaken as part of the review of the local plan and taken on board where cost effective and they would add value.</p> <p>On dwelling size, the HNA is a desktop analysis of the extent of need in the Borough. This is supplemented by current experience of dealing day to day with actual cases of people with priority needs related to the more vulnerable in society, i.e. households with children, with disabled members, those with infirmities, the elderly, etc. References in the SPD relate to dwelling types for which there are severe shortages in accommodating households with priority housing needs. Priority for larger family accommodation forms a strategic objective in the Council's Housing Strategy 2009-2014. See further analysis below in relation to comments on Paragraph 4.13. HNA methodology reports at pages 9 and 10, that the housing need shortfall identified in the study largely excludes intermediate households. DTZ HNA reports that Catalyst Housing Group is the Local HomeBuy Agent Catalyst keeps a register of households who are</p> |

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| | | actively interested in intermediate housing options. ... The figure provided is 1240 applicants registering for intermediate products. These represent only a small proportion of the numbers identified as in need of housing. Analysis of income and rents is simplistic with relatively little supply available at lowest or intermediate rent levels. |
| | The evidential basis of the statement within the draft AHSPD paragraph 3.1 setting out that there is ‘a particular need for housing for families’ is not identified - the HNA does not provide a detailed assessment indicating such a requirement. The BSHMA is now outdated and unlikely to prove a reliable basis for deriving an appropriate affordable dwelling size mix. This sentence should be deleted. | Not agreed: The Council’s Housing Strategy 2009-2014, points to larger housing for families being a particular priority. Strategic Objective 1 of the Strategy sets an expected outcome of “Increase the supply of large size family units for social rent.” This priority is therefore in accordance with the Housing Strategy priority. |
| | Paragraph 3.2 of the draft AHSPD is inaccurate and should be amended; the HNA does not demonstrate or state that the purported 932 dwelling shortfall excludes households who have shown an interest in Intermediate housing options. Furthermore, a review of the income data provided within the HNA suggests that the majority (85%) of additional annually arising affordable housing need could be addressed within Intermediate housing (see Appendix 1). | Section 3 has been redrafted and this paragraph will be largely omitted. See discussion above on same point under modelling under HNA. |
| | A full, objective, up to date assessment of overall housing requirements needs to be undertaken as a matter of urgency and used to inform a review of Plan wide housing delivery targets. Such an assessment should | Not accepted. It is planned that a review of the Local Plan will be undertaken in due course. The thrust of most of these |

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| | also be used to inform affordable housing targets, dwelling size and tenure requirements. | representations is that the evidence base is out of date and can no longer be relied upon. That is not accepted. There has been evidence of a high level of need for affordable housing in Reading for 12 to 15 years. All the HNA's that have been undertaken in Berkshire have resulted in little difference in their conclusions - there is and remains a very high level of need for affordable housing in all parts of this sub region of the County. The likelihood of there being significantly less need since, or a different profile of need since the more recent HNA work, such as to affect the conclusion that there is a high need for affordable housing, is very low. There is no evidence or other reason to suggest that the existing information is no longer relevant or that it is out of date. Matters raised will be considered in the preparation of a SHMA as part of the review of the local plan. |
| | Paragraph 3.3 of the draft AHSPD refers to the 'lack of affordable housing' as being 'a significant constraint to new employment investment in the area'. However, the up to date evidential basis of this conclusion is not identified. It is also unclear whether 'affordable housing' in this context is to be defined as NPPF compliant affordable housing or whether the statement is more generalised and referring to less expensive market housing options, including housing in the private rented sector. The | Not accepted. Background evidence to the Core Strategy pointed to a large and growing gap between jobs and residents that will result in pressure on transport and housing. More recent data and analysis suggests that the gap between jobs and economically active continues to grow and that additional |

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| | <p>Employment Background Paper referred to was published in 2007 and is outdated, and does not provide an analysis which demonstrates that new employment investment is dependent upon an increased availability of NPPF defined subsidised affordable housing.</p> <p>Text in paragraph 3.3 of the draft AHSPD should be altered as follows to reflect that whilst a lack of affordably priced housing may impact upon employment, the evidence base does not demonstrate specifically that a lack of NPPF defined affordable housing places a constraint upon new employment investment.</p> | <p>employment growth has unsustainable impacts that require mitigation. The failure to make appropriate provision as part of commercial developments will result in unacceptable, unsustainable development that suggests imposing policy limits to new employment development.</p> |
| | <p>The Provision of Affordable Housing as Part of Development Proposals it would appear that neither the 50% Core Strategy affordable housing target nor the Housing Strategy aspired 40% affordable housing target have been demonstrated to be achievable in recent years. With difficult economic conditions being forecast by the Bank of England to continue for some considerable time, it is unclear that this is likely to change considerably during the next 5 year Plan period. The policy will therefore be likely to result in every site being subject to viability assessment, and is likely to result in delays as permissions obtained on the basis of a 50% affordable housing provision are either stalled as a result of a lack of viability or necessitate a re-negotiated level of affordable housing provision prior to commencement. Within the context of current Plan policy requirements the deliverability of the 5 year housing land supply is questionable.</p> | <p>Partially agreed: Do not disagree with the assessment that we live in difficult economic conditions. The fact is that the NPPF has elevated viability as a consideration. Inevitably that has implications for determining planning applications involving affordable housing, Section 106 etc. The council is happy to consider constructive approaches to enable viability evidence to be easily presented and assessed.</p> <p>The question of whether a 5 year housing land supply can be delivered is not relevant.</p> |
| | <p>As a result of the above, The text in the paragraph 4.1 of the draft AHSPD should be altered as follows: <i>"In terms of the NPPF, paragraph 50, Reading Borough Council, has</i></p> | <p>Not agreed: Do not accept for the reasons set out in other responses above. However, some redrafting of paragraph has been</p> |

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| | <p><i>clearly: identified that affordable housing is needed: it has set policies for meeting this need; and the agreed approach contributes to the objective of creating mixed and balanced communities. Adopted policies have been demonstrated to be sufficiently flexible to take account of changing market conditions over time. Policies CS16 and DM6 accord with these provisions of the NPPF. In addition, under policy CS13, contributions towards affordable housing provision may will be sought as part of major commercial proposals involving significant employment where this is necessary to mitigate impacts on the need for affordable housing.</i></p> | <p>undertaken.</p> |
| | <p>Target figures for affordable housing provision (pages 7 to 8) Paragraph 4.3 suggests that the policy approaches to affordable housing delivery relate to the ‘total gross number’ of dwellings to be provided on-site. However, this interpretation is at odds with the policy basis of affordable housing provision at a national, regional and local level.</p> <p>Please see the review of this matter set out within Appendix 2 to these representations. This review concludes that it is a consistent feature of both planning policy and guidance on a national, regional and local level that calculations in respect of dwellings are based upon the net increase in provision. This extends to the calculation of the need for affordable housing to be provided as a consequence of development proposals. If this were not the case the impact of policy would be to deter development, prevent regeneration projects from proceeding and impose unnecessary financial obligations on developers. Paragraph 4.3 therefore needs to be amended to reflect an approach that is consistent with the Plan policy and national guidance context within which the draft AHSPD is to be applied.</p> | <p>Not accepted. Policies on housing are exclusive of policies on affordable housing. Fully accept that policy on housing provision is concerned with net additions of housing and monitoring, etc., is undertaken on that basis. However, national planning policy on affordable housing policy is not concerned with numbers; it is primarily concerned with achieving the aim of mixed and sustainable communities. The NPPF makes no reference to the need for a different approach to affordable housing provision where dwellings exist within a site. There is no other national policy basis for calculating affordable housing requirements on the basis of net additions. This approach would not comply with Policy CS16 which clearly refers to the “total” number of dwellings. There is no</p> |

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| | In para. 4.3 delete: <i>The policy relates to the total gross number of dwellings provided on the site. There is no allowance for the replacement of existing dwelling units on a site.</i> | equivocation in the words used in the policy. |
| | Paragraph 4.4 of the draft AHSPD refers to the applicant undertaking an assessment of housing demand arising from employment proposals. However, such matters should already be fully accounted for and objectively assessed within the Council's own evidence base, which should reflect planned employment and housing requirements arising in the area for the Plan period. Where the Council has negated to undertake such an assessment National Guidance does not support that the onus for an assessment should be placed upon development applicants; such an approach will not provide a cohesive, full and objective assessment of the housing requirements in the area in accordance with the NPPF and the objective of planning for Sustainable Development. Paragraph 4.4 should be amended to remove this obligation. See suggested text: | Not accepted. The impacts of employment on the need for housing is discussed above. This representation fails to quote any specific requirement from national guidance for a council to provide an assessment of housing demand arising from individual employment proposals. It is difficult to see how a council would make such an assessment when it is not aware of the employment proposals likely to arise when it draws up its plans? Where does national guidance assert that it does not support the onus for such an assessment? The NPPF is silent on many issues because it supports the principle of localism and for many issues to be determined locally to meet local conditions and expectations. This is adopted policy and the requirement is necessary to support sustainable economic development. |
| | Paragraphs 4.9 to 4.11 of the draft AHSPD should be deleted - these largely re-state the NPPF affordable housing definitions albeit lacking some of the key terms included in the definitions. As such, the inclusion of these paragraphs is unnecessary and inappropriate. | Not accepted. These paragraphs reflect the NPPF definition but indicate the local situation. In the era of localism, planning guidance should reflect the local situation. Nothing in these paragraphs contradicts the |

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| | | NPPF. This section will however be edited anyway. |
| | <p>In paragraph 4.12 the wording states that Affordable Rents can be too expensive for ‘many’ households in affordable housing need in Reading. However, this conclusion is misinformed as the Affordable Rent can be provided with rents of between Target Rents (as applicable to Social Rents) and 80% of local market rents. As such, it is entirely possible for Affordable Rent to have housing costs in line with Social Rent, the Homes and Communities Agency 2011-2015 Affordable Housing Framework simply seeks that robust reasoning for any reduction from the 80% maximum is provided.</p> <p>However, the Council’s evidence base (which fails to review how Housing Benefit will assist households where means testing suggests assistance is required) does not robustly demonstrate that Affordable Rents provided at 80% of local market rents will be unaffordable to households in affordable housing need. The Council’s 2011/12 evidence base is considered in Appendix 1 to these representations. As social housing the Affordable Rent tenure is not subject to Local Housing Allowance caps or rates, but benefit payments are assessed in the same way as they are in respect of Social Rented housing. The Household Benefit cap will only be applied to households who are not exempt from it and which contain members of working age none of whom work (part or full time). This incentivises individuals into work and reduces the risk of benefit reliance. Paragraph 4.12 should be amended to reflect evidentially supported conclusions.</p> <p>In paragraph 4.12 omit <i>Affordable Rents are often too expensive for many of those identified as in housing need in Reading.</i></p> | <p>Not accepted. Again, these comments relate to HCA operations, but it is likely that Section 106 sites will not receive HCA funding and so often not relevant. The paragraph explains the Council’s position although accept that it could be made clearer, i.e. that it is referring to Affordable Rent at 80% market value as being too expensive for many. Will rephrase to make clear that Affordable Rent at lower levels of market value, equating to Target Rents, or thereabouts, will be sought.</p> |

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| | <p>The claim within paragraph 4.13 that the ‘main priority’ affordable housing need is for ‘larger family housing’ is not evidentially supported and should be deleted (see Appendix 1). The limited assessment of dwelling size requirements in the 2011/12 HNA suggests that 83% of applicants on the Housing Waiting List are seeking 1 and 2 bedroom dwellings. There is no analysis of priority current and future arising dwelling size needs. The under provision of sufficient 1 and 2 bedroom dwellings will frustrate the opportunity to re-house under occupying households in dwellings appropriately sized to meet their needs and who are either: i) likely to be impacted upon by welfare reforms in respect of Housing Benefit payment and under occupation, or, ii) older person households who could be incentivised to downsize thus freeing up larger family homes.</p> | <p>Not accepted. This repeats arguments made earlier. The Council’s Housing Strategy 2009-2014, points to larger housing for families being a particular priority. Strategic Objective 1 of the Strategy sets an expected outcome of “Increase the supply of large size family units for social rent.” Accept that numerically there is a substantial need for smaller accommodation but larger properties are needed as a priority for some of the more vulnerable households, particularly families with children. A very simple analysis of waiting list data shows that: 22% of voids created in 2012/13 were 3 and 4 beds which equates to 58 properties. There are 1589 households waiting for 3+ beds representing 16.66% of the waiting list. This means that we can only rehouse 3.7% of households waiting for 3+ beds each year. The turnover of larger sized properties is far less frequent than 1 and 2 beds - so whilst the numbers requiring larger sized accommodation may be less, it is probable that those more vulnerable applicants have to wait longer for suitable accommodation. This is a legitimate local priority.</p> |
| | <p>Similar concerns apply in respect the evidential validity of the wording in</p> | <p>Not accepted. The opinion that the BSHMA</p> |

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| | <p>paragraphs 4.14 and 4.15 (see Appendix 1). The preferences for Affordable Rents to be restricted to 50% of local market rents and for 3 bedroom dwelling housing costs to be restricted to Target Rents are not robustly evidenced; the HNA does not have regard to up to date income data or to the availability of Housing Benefit assistance for social sector housing. The 2007 BSHMA and Reading Housing Needs Assessment are outdated.</p> | <p>and HNAS are outdated is noted but is not accepted. Such studies are to support the development of policy. An SPD is an interpretation and clarification of adopted policy. It does not need a new evidence base.</p> |
| | <p>Paragraph 4.15 inappropriately refers to Affordable Rent as Intermediate housing - this is contrary to the NPPF definitions of these tenures. The 50:50 subsidised social housing and Intermediate housing split should be referred to as a minimum Intermediate tenure proportion given that a review of the data relied upon within the HNA suggests that the majority of the net affordable housing need could be addressed within an Intermediate tenure at a range of Intermediate housing costs.</p> | <p>Not accepted: It is not accepted that the paragraph inappropriately refers to Affordable Rent as intermediate housing. It splits affordable rent between higher subsidy housing where the affordable rent is provided are relatively low proportions of market rent and lower subsidy housing where the affordable rent product is provided at 80% of market rents or similar. The council does not accept that the majority of the need could be addressed within intermediate housing. Other issues addressed previously.</p> |
| | <p>Paragraph 4.16 refers to the Council's draft Tenancy Strategy and the aspired imposition through this upon Registered Providers to only let 1 and 2 bedroom properties at an Affordable Rent, and for this to be set no higher than the Local Housing Allowance rate (i.e. set at the 30th percentile of local market rents). Similar approaches are included within paragraphs 4.25 and 4.26 of the draft AHSPD - seeking that three bedroom homes or larger are let at target rent levels and are precluded from conversion to Affordable Rent at re-let, and seeking to restrict the level</p> | <p>Partially accepted. The Tenancy Strategy, produced by the Councils Housing Section has been adopted. This information will be transferred to a separate appendix to provide clarity for applicants. They summarise matters that affect the management and operation of any affordable housing. The Council believes that applicants should be</p> |

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| | <p>of such conversions within existing 1 and 2 bedroom housing. However, these preferences stem from the summary of affordability in the draft Tenancy Strategy, which is based upon HNA conclusions and is therefore unreliable and evidentially unfounded for the reasons highlighted within Appendix 1 and summarised at Section 3.0 of these representations above.</p> | <p>aware of such provisions in making their proposals.</p> |
| | <p>The references within the draft Tenancy Strategy to the Local Housing Allowance rates are irrelevant to Affordable Rented housing (which is social housing and occupants are not paid Housing Benefit via the Local Housing Allowance scheme),</p> <p>vi) the Household Benefit cap will, as already noted, only be applied to households containing members of working age and within which no member (deemed physically able to work) is employed (either part or full time), and,</p> <p>vii) such a stance conflicts with the NPPF, is injurious to scheme viability and appears to be based upon a flawed interpretation of research undertaken by DTZ in February 2012 (i.e. the HNA) which has not been made available for public consultation nor subjected to independent examination.</p> <p>The draft Tenancy Strategy should be amended to remove these restrictions and paragraphs 4.16, 4.25 and 4.26 should be deleted from the draft AHSPD.</p> | <p>Partially accepted. The Tenancy Strategy, produced by the Councils Housing Section, has been adopted. Paragraphs 4.25 and 4.26 were for information to provide clarity for applicants. The Council believes that applicants should be aware of it in making their proposals. This information will be transferred to a separate appendix to provide clarity for applicants.</p> |
| | <p>The implications of badly drafted and unduly restrictive Tenancy Strategies should not be underestimated given the influence these exert on Registered Provider tenancy policies and therefore affordable housing delivery via section 106 contributions. Clearly, where the Tenancy</p> | <p>Partially accepted. The Tenancy Strategy, produced by the Councils Housing Section, has been adopted. This information will be transferred to a separate appendix to provide</p> |

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| | <p>Strategy is drafted in such a way that it seeks to restrict the range of NPPF compliant affordable housing options that can be provided and apply additional burdens to development outside of the Plan process, it is likely to frustrate the delivery of housing overall. As a result the entire Development Plan will be put at risk, potentially rendering Housing policies out of date and resulting in a reversion to the Presumption in Favour of Sustainable Development.</p> | <p>clarity for applicants. They summarise matters that affect the management and operation of any affordable housing. The Council believes that applicants should be aware of such provisions in making their proposals.</p> |
| | <p>Affordable Housing - Sizes of Provision (pages 10 to 11) The Council includes a preference in paragraph 4.17 for the 'range and mix' of affordable housing to reflect 'identified local needs' - it is unclear how the Council will assess that this objective is met by proposals, or how applicants are to determine that their proposals align with this aspiration, given that the evidence base does not review affordable housing needs at a sub-area level. The draft AHSPD should identify the objective assessments of current and future affordable housing need in respect of localities within the borough that should be referred to, or if local assessments are unavailable seek to ensure that such assessments are undertaken.</p> <p>Paragraph 4.17 also expresses the Council's preference for the prioritisation of 'larger 3 and 4 bedroom' affordable housing - as already stated and reviewed in Appendix 1 this is not evidentially demonstrated to be the most pressing affordable housing need in the borough and certainly does not reflect the huge numerical emphasis within the Housing Waiting List upon 1 and 2 bedroom housing (as set out within the HNA). Paragraph 4.17 should be amended to reflect this.</p> <p>Suggested Text Changes to paragraph 4.1</p> | <p>Not accepted: Reading Borough is a very small district in land area and does not have sub area levels or the ability to differentiate different needs in different areas. Development opportunities are unevenly spread, primarily in Central and Southern areas. They, therefore have to serve the needs of the whole borough. Sub area assessments would not serve any purpose.</p> <p>Not accepted: The Issue of family housing dealt with above.</p> |

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| | Given that paragraph 4.17 seeks that local affordable housing needs are provided for, the draft AHSPD should identify the objective assessments of current and future local affordable housing need in respect of sub-areas within the borough that should be referred to when preparing proposals, or, if local assessments are unavailable, the Council should seek to ensure that such assessments are undertaken. | Not accepted, see above |
| | <p>Priority Housing Needs (page 11)</p> <p>Paragraph 4.18 sets out a wish list of types and tenures of affordable housing including specialist housing, adapted housing, and bungalows, and suggests that these ‘finer grained’ priorities for housing are identified within the Housing Waiting List and the draft Tenancy Strategy. It is also stated that these priorities may be amended via the Housing Strategy. These sources are not SHMA and do not represent an objective assessment of current and future net affordable housing need. Suggested text changes for para 4.18.</p> | Not accepted: Sources are derived from local housing needs assessments as evidenced by the Council’s housing needs section the role of which is to deal with, assess and provide for priority needs in the Borough. The SMHA and HNA are desk top studies using available demographic and other data. They do not necessarily reflect the day to day pressures and experience. Experience shows that voids for these needs are very low and, without some priority, these very vulnerable households will have little chance of being adequately housed. |
| | <p>Securing long term use of affordable housing</p> <p>Paragraphs 4.19 and 4.24 should be amended to align with the NPPF definition of affordable housing - this does not require the retention of affordable housing in perpetuity, but refers to the recycling of subsidy. The Community and Infrastructure (“CIL”) Regulations in respect of Social Housing Relief support the stance that affordable housing is not intended to be retained in perpetuity - Regulation 53 applies a ‘claw back’ period</p> | Not accepted: Another partial quotation! NPPF states: <i>“Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.”</i> Change wording to reflect this definition. Do not accept need to change Paragraph 4.24. |

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| | <p>during which CIL social housing relief can be reclaimed if the affordable home to which it relates ceases to be a qualifying dwelling, and this extends to 7 years.</p> <p>In paragraph 4.19 the draft AHSPD states that the Council will ‘generally secure provision of affordable housing through a Section 106 Agreement’. However, whilst this can be referred to as a preference, it cannot be imposed prescriptively by the Council, and contributions may also be secured by way of a Condition (as demonstrated in the recent Secretary of State appeal decision in respect of Land West of Shinfield2).</p> <p>Paragraph 4.20 contains a preference for the freehold in serviced land or completed dwellings to be transferred to ‘a registered HA’ - again this preference should be applied in the context of the NPPF definition which does not specify that affordable housing must be owned by a Registered Provider. Paragraphs 4.21 to 4.22 set out the Council’s strong preference that developer’s work with the Council’s partner Registered Providers.</p> <p>Whilst it is acknowledged in the draft AHSPD that the Council cannot prescribe providers, it is suggested by the wording of the AHSPD that the Council will be unlikely to be supportive where affordable housing is provided by non-partner Registered Providers. However, it remains the position (as set out within the Affordable Housing policy statement ‘Delivering Affordable Housing’ which remains extant) that the Council should not seek to impose restrictive practices which will inhibit innovation and competition between providers. As such, the preferences expressed in the draft AHSPD should be applied with this in mind. Suggested new text for para 4.19</p> | <p>CIL is not in place and not relevant to the issue of providing affordable housing as part of a planning proposal. Section 53 is concerned with social housing relief from CIL charges where social housing relief from CIL has been granted.</p> <p>Paragraph 4.19 sets out how Reading Borough Council will generally secure provision... It is advice/guidance to applicants making an application to Reading Borough Council. It does not rule out other means but reflects Reading Borough Council’s expectation and preference. There are significant issues with the use of conditions to secure affordable housing. For a local authority an agreement will always be preferable. However, accept some of the suggested amendments to the paragraph.</p> <p>Similarly, Paragraphs 4.20 to 4.22 express the Council’s expectations/preference. 4.20 states, “will normally wish to see...” But for any alternative means of provision, the Council will want reassurances that alternative forms of provision will provide affordable housing that fully meets the definition. Wording that will enable provision</p> |

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| | | by providers who are not registered providers will be added. |
| | <p>Conversions upon re-letting (pages 12 to 13) Paragraph 4.27 is unnecessary as Registered Providers will be required to operate within the constraints of a Homes and Communities Agency contract if they are to be able to provide any Affordable Rented housing, and information in respect of the conversions is reflected within lettings data submitted via the Continuous Recording System and therefore publicly available (as required by ‘The Regulatory Framework for Social Housing in England from April 2012’, published March 2012 by the Homes and Communities Agency). As such, paragraph 4.27 should be deleted.</p> | <p>Partially accepted. With reference to some of the discussion above, this emphasises why it is preferable for Registered Providers should be involved rather than alternative providers. Paragraph 4.27 reflects the Council’s current expectations. It is information that is useful for developers/applicants to be aware of but accept that it is not a specific planning requirement. Most of this section will be transferred to an appendix containing relevant advice from the Council’s Tenancy Strategy.</p> |
| | <p>Design and Standards of Housing (page 13) In paragraph 4.28 the draft AHSPD states that new affordable housing will be expected to meet minimum standards (including in respect of floor space and room sizes) and states that housing to be transferred to Registered Providers ‘should, as a minimum, meet the former Housing Corporation “Scheme Development Standards” (or any updated standards)’ in addition to standards set out within the Council’s planning policy. However, there is no higher level local policy requirement for affordable housing (to be transferred to a Registered Provider or otherwise) to be designed / constructed to achieve Homes and Communities Agency Design Quality Standards.</p> | <p>Partially accepted. Again the SPD is expressing the Council’s preference - “expected to meet....” It would be pretty poor housing if it doesn’t meet those minimum standards and the Council would find it difficult to accept that such housing meets local needs. In addition, why should the Council accept lower standards of quality than the HCA accepts? But as with all these things it is a matter of fact and degree and a matter for negotiation and consideration as part of the planning application process.</p> |

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| | <p>The draft AHSPD does not reflect the NPPF requirement that:</p> <p>Local standards should be set out within the ‘Local Plan’, and Supplementary Planning Documents should not be used to impose additional burdens upon development, the costs informing viability are to be assessed at the Plan making (i.e. Core Strategy) stage, and the ‘cumulative’ impacts of ‘existing and proposed local standards’ should not jeopardise the implementation of the Development Plan.</p> <p>The Government has made it clear that it wants to reduce duplication of standards and ensure cost effectiveness; alterations to standards will be checked in terms of viability and introduced centrally via Building Regulations (paragraphs 2.295 and 2.296 - ‘The Plan for Growth’, March 2011). The imposition of a standard such as this has also been considered at appeal (albeit prior to the NPPF) and it has been concluded that such an obligation fails two of the tests set out in the now cancelled Circular 5/05 and which are now set out within paragraph 204 of the NPPF.</p> <p>The Council cannot impose the approach set out within paragraph 4.28 upon developers where affordable housing is being delivered without the input of public subsidy, albeit it may be a matter for negotiation. Paragraph 4.28 should be amended to reflect this.</p> | <p>Proposals that do not meet HCA HQI standards are unlikely to be eligible for HCA funding in the future. Schemes often receive planning permission years before they are built. Funding regimes alter over time as does the availability of grant. Proposed developments often change hands and any proposed sub-standard housing would be excluded from obtaining available grants. Our experience is that most developers now accept these standards for affordable housing. Failing to meet these standards is therefore also very short sighted. Some rewording of paragraph will be undertaken.</p> |
| | <p>Provision of Affordable Housing on Surrogate Sites (page 11)</p> <p>The wording in the second bullet point within paragraph 4.29 should be clarified to reflect that the mix of affordable housing to be provided as an off-site contribution should be similar to the mix of affordable housing on the contributing site - currently the wording is unclear and could suggest that the mix of affordable housing to be provided off-site should reflect</p> | <p>Largely Accepted. Agree that the wording could be clearer. Again, the Council is setting out its preferences and expectations to ensure that applicants/developers are clear about them.</p> |

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| | <p>the overall housing mix on the contributor site. However, market and affordable housing mix requirements are likely to differ substantially and the imposition of a blanket requirement such as this will restrict the ability of developers to provide affordable housing to address housing need and market housing to meet market demand. Paragraph 4.29 of the draft AHSPD should be amended as suggested.</p> | |
| | <p>Financial Contributions / Commuted Sums in Lieu of on-site provision (pages 13 to 14)</p> <p>Paragraph 4.31 of the draft AHSPD refers to commuted sum payments and refers the reader to ‘Addendum 1’ attached to the draft AHSPD for additional detail on the calculation of commuted sums. Unfortunately, the approach detailed within ‘addendum 1’ does not accord with the NPPF paragraph 50 and paragraph 204. The NPPF retains the approach set out within its predecessor PPS3 and requires that any off-site or commuted sum payments in lieu of on-site provision are to be ‘broadly equivalent’ to the contribution that would have been made on-site. As such the cost to the developer should reflect the level of subsidy that would have been required from them had the provision been made on site.</p> <p>In addition, the approach taken by the Council (i.e. seeking to base the affordable housing contribution on the contributing site with 100% market housing provision) results in an inflated level of affordable housing contribution to that which would have been made on site. This has previously been found to inappropriate at appeal, and whilst the appeal is dated the relevance remains given that the ‘broadly equivalent’ wording</p> | <p>Partially accepted? 4.31 and Appendix amended to refer to a calculation for commuted sums that will be ‘broadly equivalent’ to the contribution that would have been made on-site.</p> |

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| | <p>has been retained within current national guidance.</p> <p>Where the level of subsidy sought by the Council (calculated on the basis of the level of subsidy the Council has assessed a provider will require to provide an additional dwelling at an alternative location, and based on the gross development value of the site in question assuming 100% market housing) exceeds the cost to the developer had the provision been made on site then this will fail to reflect national guidance, and is unlikely to meet the tests within paragraph 204 of the NPPF and CIL Regulation 122 (i.e. necessary, directly related to the development, and fairly and reasonably related in scale and kind).</p> <p>Paragraph 4.31 and Addendum 1 of the draft AHSPD should be amended / re-worked to reflect the NPPF, to ensure that the level of affordable housing contribution is of a 'broadly equivalent value' to that which would have been made on-site.</p> | |
| | <p>Viability of Provision (pages 14 to 16)</p> <p>The following concerns are raised in respect of the development of the draft Affordable Housing Supplementary Planning document where it draws upon the Core Strategy Policy CS16:</p> <ul style="list-style-type: none"> • A Viability Assessment of the proposed affordable housing targets and thresholds was not reviewed as part of the Core Strategy Examination Process, and such an assessment is not listed as a Core Document for that Examination. • Reference is only made by the Inspector to previous trends in respect of | <p>Again this misunderstands the legal basis of the planning system. Policy CS16 is part of the adopted Core Strategy. It is part of the development plan. The consultation on the SPD is not a mechanism for discussing the merits, soundness or any other aspect of the adoption of policy CS16. Legally, the policy is in place; it was based on evidence; it is the basis for determining planning applications and the time for challenging it has long passed. In any case, the policy is compliant</p> |

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| | <p>the levels of delivery achieved, and to a Housing Background paper. The Housing Background paper does not include or constitute a Viability Assessment and it is unclear that the previous delivery trends referred to within Housing Background paper represent a realistic assessment of likely future levels of delivery.⁵</p> <ul style="list-style-type: none"> • Reference is made by the Examining Inspector to ‘work’ having been ‘undertaken’ during 2003/04 in respect of Viability, but this work would have been dated at the point of the Core Strategy Examination (and is now 8 years old) and the detail of the work was not consulted upon / reviewed by the Inspector as part of the Examination. • The Core Strategy affordable housing policy has not been developed in accordance with the NPPF requirements, and is in significant conflict with the Plan Making section of the NPPF: <ul style="list-style-type: none"> o An assessment of the ‘likely economic viability of land to meet the identified need for housing over the plan period’ was not undertaken (see paragraphs 159 and 173 of the NPPF). <p>Subsequent viability assessments will not remove this conflict from the original plan making process and render the Core Strategy NPPF compliant - the Plan policy approach needs to be reviewed through the appropriate statutory processes.</p> <ul style="list-style-type: none"> o The NPPF states that infrastructure and development policies should be planned at the same time (and ‘kept under review’) to enable the | <p>with NPPF¹. This consultation is about how the SPD interprets the adopted policy in practice. What happened at the examination or what the Inspector considered is now not relevant as the period for challenge of the policy or the adoption of the Core Strategy ended in 2008.</p> <p>The University can constructively argue that since the Core Strategy was adopted in 2008, circumstances have materially changed and the implementation of policy CS 16 as written should be weighed against and have regard to those changes.</p> <p>Mostly the argument here is that the plan was adopted before the NPPF and it’s policies cannot therefore be in accordance with it. Work has been done to assess the Council’s policies against the NPPF.² However, that does not mean that the Core Strategy is not part of the development plan.</p> |

¹ http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/22480/Reading-Borough-Council-Response-NPPF-Issues-0512.pdf

² http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/21153/CTP-001-Council-Response-to-Inspectors-Questions-Day1AM.pdf

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| | <p>cumulative cost impact of such burdens upon development to be assessed collectively; this includes CIL charges, affordable housing and any other standards. The Core Strategy does not accord with this and requires urgent review.</p> <p>o The Core Strategy Policy CS16 wording does not state that viability will be taken into consideration at a site level, and thus is inflexible in addition to including a target that was not subject to viability assessment and examined on this basis. Supporting text refers to site level viability assessment, but this is not Policy.</p> <p>The NPPF is clear that only Plans with a ‘limited degree of conflict’ can continue to be ascribed ‘full weight’ - the Core Strategy policy CS16 exceeds a limited degree of conflict, and is therefore only eligible for ‘due weight’ to be ascribed, reflecting the degree of conflict with the NPPF. In March 2013, without review, even elements of ‘limited’ conflict will be subject to ‘due weight’ as opposed to ‘full weight’. Furthermore, where a deliverable (and therefore viable) supply of housing land cannot be demonstrated paragraph 49 of the NPPF confirms that relevant housing policies will be rendered out of date.</p> | <p>Proposals will have to be assessed in relation to current economic conditions and updated national guidance. Reading Borough Council will, in due course, be going forward with a review of the local plan. At that time policies will be reviewed and updated in the light of relevant guidance operating at that time.</p> <p>Implementation of CS16 has always been negotiated in the light of other material considerations including viability assessment as indicated in the supporting text.</p> <p>The practice of the council is to give consideration to other material considerations submitted with an application, including evidence on viability and to weigh such considerations against the legal requirement to determine an application in accordance with the development plan unless...³</p> <p>Disagree with the final sentence. Reading has an adequate deliverable supply of</p> |

³ Section 38 (6) of the Planning and Compulsory Purchase Act 2004.

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| | | housing land (see Annual Monitoring Report) |
| | <p>The Sites and Detailed Policies DPD (“SDP DPD”) Inspector’s report (paragraph 51) confirms that the soundness of the Core Strategy Policy was not reviewed as part of the process of the SDP DPD Examination process. The SDP DPD Examination suggests that the Council acknowledge that the Core Strategy requires review in the ‘near future’ (paragraph 11, Inspector’s report).</p> <p>3.37 The Core Strategy policies are out of date given that they are in significant conflict with the NPPF, and the assumed housing land supply is not demonstrated to be deliverable in accordance with the NPPF. The weight that can be attached to the CS16 Policy basis of the draft AHSPD is therefore questionable, and this in turn impacts upon the weight to be attached to this aspect of the draft AHSPD, even if it is adopted. Such matters are likely to be tested at appeal.</p> <p>3.38 Paragraph 4.33 of the draft AHSPD refers to viability testing undertaken in respect of the affordable housing targets within Policy DM6 of the Sites and Detailed Policies Development Plan Document. However, significant concerns were raised in response to the Inspector’s Matters and Questions in respect of the validity of the viability evidence base conclusions informing the Sites and Detailed Policies Development Plan Document affordable housing Policy DM6 (seeking contributions from sites of less than 15 dwellings and referred to in paragraph 4.33 of the draft AHSPD).</p> <p>Unfortunately, on the basis of the concerns not having been raised previously during the consultation process, the Inspector chose not to</p> | <p>Disagree. Policies are not in conflict and in any case are implemented in accordance with current government guidance in relation to the consideration of viability.</p> <p>The university is at liberty to make these points in any appeal in which they are involved. However, in accordance with paragraph 215 of the NPPF, given that the affordable housing policies comply with the requirements of the NPPF (they are based on a viability assessment and responds to the requirements in paragraph 174 in that they set out local standards and due consideration was given to cumulative impacts of policies) the policy should be afforded great weight</p> <p>This repeats matters raised above. Policy DM6 is part of the Adopted plan and is the development plan policy against which sites of less than 15 dwellings will be determined.</p> |

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| | <p>discuss the material submitted during the Hearing sessions and as such the conclusions within those representations were not reviewed during the Examination. This does not alter the fact that serious concerns were raised calling into question the validity of the Policy DM6 approach to affordable housing and the reliability of the viability conclusions.</p> | |
| | <p>Paragraph 4.43 of the draft AHSPD accepts that the levels of affordable housing sought within the DM6 affordable housing targets may not be achieved, and suggests, therefore, that a case by case viability assessment approach will be applied. This does not accord with the NPPF which requires that local authorities have a deliverable 5 year supply of housing land - to be deliverable the NPPF requires that land must be viable. It is not evident that either Policy CS16 or DM6 enable a deliverable (i.e. viable) 5 year supply of housing land.</p> | <p>These continue to be objections to a recently adopted development plan policy and do not provide any constructive criticism of the content of the SPD. The policy was constructed on the basis that the plan is of the period up to 2026 and that it will be applied flexibly in the light of prevailing economic conditions, particularly the issue of viability. It does not prevent the delivery of viable development. The SPD is intended to provide mechanisms for viability to be appropriately assessed and thus enable planning permission to be granted.</p> |

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| | <p>In this regard it is relevant to note that the Secretary of State for Communities and Local Government issued a Ministerial Statement on the 6th September 2012. This further emphasises the need to provide new homes to meet Britain's demographic needs and to help generate local economic growth. The statement confirms that the Coalition Governments number one priority is to:</p> <p><i>"...get the economy growing. We must create the conditions that support local economic growth and remove barriers that stop local businesses creating jobs and getting Britain building again."</i></p> <p>The Statement also confirms that:</p> <p><i>"It is vital that the affordable housing element of Section 106 agreements negotiated during different economic conditions is not allowed to undermine the viability of sites and prevent any construction of new housing. This results in no development, no regeneration and no community benefits at all when agreements are no longer economically viable.</i></p> <p><i>The Government estimates that up to 75,000 new homes are currently stalled due to site viability. S106 is an important tool to provide affordable housing and we welcome the flexible approach that many councils have already taken to renegotiating these agreements where necessary. The Government is also acting to get developers and councils around the table through its new mediation scheme. However, given the current imperative for growth, we need to do more.</i></p> <p><i>The Government will now introduce legislation, to be effective in early 2013, which will allow any developer of sites which are unviable because of the number of affordable homes, to appeal with immediate effect.</i></p> <p><i>The Planning Inspectorate will be instructed to assess how many</i></p> | <p>There are appropriate provisions within the SDPD and the draft SPD for consideration of these matters. Reading Borough Council has always been willing to negotiate reasonably in relation to evidence of viability of development and will continue to do so. The SPD is intended to be a constructive device to help developers and landowners to provide appropriate justification where viability is an issue.</p> <p>Indeed DCLG have now published, "Section 106 affordable housing requirements, Review and Appeal," April 2013, to address these matters and the aims of the Growth and Infrastructure Act 2013. The final version of the SPD will have regard to that guidance, in particular its viability test and the Annex on Viability Reappraisal which summarises potentially relevant key issues for a reassessment of viability, most of which are relevant for a first time viability assessment.</p> |

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| | <p><i>affordable homes would need to be removed from the Section 106 agreement for the site to be viable in current economic conditions. The Planning Inspectorate would then, as necessary, set aside the existing Section 106 agreement for a three year period, in favour of a new agreement with fewer affordable homes. We would encourage councils to take the opportunity before legislation comes into effect to seek negotiated solutions where possible.</i>" (emphasis added)</p> <p>Clearly, the Government's emphasis within the 6th September 2012 Statement aligns and re-confirms the NPPF approach to viability and seeks to ensure that Councils do not over burden land owners and developers with excessive policy requirements which render sites unviable, and Councils are strongly advised by the Ministerial Statement to negotiate where this is demonstrated to be the case.</p> | |
| | <p>The Government introduced draft legislation on the 18th October 2012 in the form of the Growth and Infrastructure Bill which, if enacted, will enable those subject to affordable housing planning obligations to request local authorities to review the obligations imposed where these render a scheme unviable, and to appeal directly to the Secretary of State. Such appeals are likely to proliferate in areas where local authority policy approaches are imposed which over burden landowners and developers</p> | <p>Not accepted: As indicated above, the Council believes that it has a healthy land supply and that the university is at liberty to make these points in any appeal in which they are involved.</p> |
| | <p>The deliverability of the underlying policy basis of the draft AHSPD is questionable given that it is unclear that the targets enable a viable / deliverable 5 year housing land supply. In particular, the Core Strategy</p> | <p>Not accepted: As indicated above, these are adopted policies forming part of the development plan. The Council believes that</p> |

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| | target was introduced without having been prepared on the basis of a publicly consulted viability assessment, or a viability assessment that has been tested through the examination process. As such, there is a risk that housing policies may be concluded to be out of date during appeal scenarios leaving proposals to be determined on the basis of the presumption in favour of sustainable development. | it has a healthy land supply. The university is at liberty to make these points in any appeal in which they are involved. |
| | In any event, after March 2013 full weight will not be applicable where Plan policies exhibit even a limited conflict with the NPPF. The draft AHSPD, the adoption of the Sites and Detailed Policies DPD and the 2012 CIL Viability Assessment do not remove the need to review Plan policy having regard to the cumulative impact of policy requirements and the need to ensure a 5 year viable supply of housing. Another assertion that development plan policies will not stand up at appeal. | Disagree. That is a very simplistic, interpretation of what the NPPF says and is not backed up by any expert legal evidence. Applications will continue to be determined in accordance with the development plan unless other material considerations indicate otherwise. It is still for the decision maker to determine. The local plan will be reviewed in due course. A 5 year housing land supply is not an issue for Reading Borough at the current time. Additionally and notwithstanding the above, the policies accord, and are compliant, with the requirements of the NPPF. |
| | Procedures Paragraph 5.2 refers to standard draft legal agreement clauses prepared by the Council. Whilst these may be proposed by the Council as their preferred approach for negotiation they do not represent fixed requirements and it would be inappropriate were the Council to seek to impose such matters. | Noted: One objective of an SPD is to assist applicants in the process of obtaining planning permission in a timely manner. This is the practice of the Council. It is saying that it will be helpful in processing the application if it is done this way. Applicants can seek to do it another way if they so wish |

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| | | but that is unlikely to be helpful in drafting the legal agreement in a timely manner. |
| | Paragraph 5.5 seeks that financial contribution payments are paid at the 'commencement of development' unless otherwise agreed. It is essential that the Council remains flexible on this matter as the imposition of any such approach is not supported at a higher policy level and is likely to impact negatively on scheme viability. The wording should clarify that this is a preferred as opposed to required approach. Suggested amended text. | Partially accepted. Text amended to reflect flexibility. |
| | | |
| | Appendix 1 The Housing Need Assessment and Affordable Rent Review, February 2012 ("HNA") | For information: A lot of what is in the appendix has already been covered in responses above. Only one or two points are dealt with here where they raise matters not dealt with above. |
| | Very detailed critique of the HNA including the accusation that it is not in accordance with the relevant practice guidance, Strategic Housing Market Practice Guidance Version 2. | Worth noting that DTZ who undertook the Berkshire SHMA wrote the original Housing Market Assessment Manual for ODPM and were heavily involved in the preparation of Version 2. |
| | AH Needs Modelling. Inference that the Practice Guidance indicates that this should be addressed over the remaining period of the plan rather than 5 years and this would significantly reduce the level of need. | Guidance advises it should be over 5 years although it could be a longer period. It is up to the local authority to decide. It is hardly acceptable to expect people in housing need and often in very unsatisfactory living conditions to, as a matter of policy, wait 14 years before there is any prospect of being |

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| | | housed. This is relevant to other criticism of the HNA |
| | The Core Strategy housing figures are based on outdated growth assumptions. | Not accepted: Paragraph 5 fails to understand that the 521 figure in the SEP was volunteered by RBC based on estimated capacity not growth assumptions. |
| | Paragraph 14 and following and elsewhere in the analysis criticises a lack of evidence on the role of the private rented sector and claims that it can provide appropriate affordable accommodation. Refers to work in Sefton in north-west England. | Not accepted?? The private rented sector is also under huge pressures in the current market and is seeing rapidly increasing rents. There is clearly a shortage of such accommodation in Reading. It might provide accommodation at levels that some h/h's could afford but there is currently huge competition for very limited accommodation. Sefton is not Reading and does not face the same pressures on housing as Reading. |
| | Appendix 2 - The Calculation of Affordable Housing Requirements. This discourse provides an expanded discussion seeking to justify their view that affordable housing requirements should only be applied to the net increase in housing. | Not accepted: Arguments rebutted above in relation to comment. Appendix "provides background to the calculations and examples of those calculations used to work out contributions. |
| Other points | In developments for student or non C3 housing, will there be a requirement for affordable housing? The SPD is not clear on this matter. | Some wording added |

ⁱ NOMIS, Labour Force Survey 2007-2012 1

ⁱⁱ NOMIS, BRES/ABI, 2007-2012

ⁱⁱⁱ NOMIS, Labour Force Survey 2007-2012

Reading Borough Local Development Framework

Supplementary Planning Document

Affordable Housing Provision as part of Planning Obligations under Section 106 of the Town and Country Planning Act 1990

Core Strategy Policies: CS16 and CS13
Sites and Detailed Policy Document Policies: DM6 and DM7

DRAFT REVISED SPD (July 2013)

Head of Planning and Building Control
Reading Borough Council.

July 2013

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1.0 Introduction

- 1.1 Affordable housing is defined (in the National Planning Policy Framework (NPPF)) as, "Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Where they have identified that affordable housing is needed, authorities have to set policies for meeting this need and contributing to the objective of creating mixed and balanced communities¹.
- 1.2 Reading Borough Council (RBC) adopted its Sites and Detailed Policies Document in October 2012. This contains Policy DM6, which seeks to achieve the provision of contributions of affordable housing on sites of between 1 and 14 dwellings. Guidance on how this policy will operate is provided in this SPD.
- 1.3 The Draft SPD was approved for consultation by the Council's Cabinet in November 2012. It was published for consultation in November 2012 and the consultation period ran for 6 weeks closing on 21st December 2012. Various representations were submitted and these have been carefully considered (in a separate Statement of Consultation) and revisions made to the Draft SPD.

Supplementary Planning Document (SPD)

- 1.5 This Supplementary Planning Document (SPD) is intended to provide users of the planning service in Reading with an appropriate framework for determining the size, type, form and content of affordable housing that will be sought in considering whether planning applications for development accord with various local planning policies that form part of the development plan for the Borough. It has been prepared in accordance with current government advice in the National Planning Policy Framework (NPPF). It also takes account of how affordable housing is defined, funded, provided and managed in accordance with government housing policies, much of which has changed in recent years.
- 1.6 The guidance will apply to all residential developments of 1 dwelling or more.

¹ DCLG, National Planning Policy Framework (NPPF) (2012). See Glossary - extract provided at Appendix 1.

2.0 Policy Background

The Development Plan

- 2.1 Applications must be determined in accordance with the development plan. In relation to affordable housing, applications to RBC for development containing residential accommodation will be determined in accordance with Core Strategy policy CS16² for sites providing 15 dwellings or above and policy DM6 in the Sites and Detailed Policies Document³ for sites of less than 15 dwellings.
- 2.2 Policy CS16 (Affordable Housing) requires the provision of 50% of the total number of dwellings on sites of 15 dwellings and above in the form of affordable housing to meet the needs of the area as defined in a housing needs assessment. Such housing should remain affordable.
- 2.3 Policy CS13 (Impact of Employment Development) indicates that employment development should provide mitigation measures in line with its impacts on the demand for housing (including affordable housing), labour and skills, and on the transport network. The tight labour market of Reading and the wider Thames Valley area means that additional employment development could result in still greater pressures on housing in the Borough. Pressure on housing can particularly affect those who cannot afford open market housing. New employment development is therefore expected to contribute to the provision of affordable housing.
- 2.4 Policy DM6 (Affordable Housing) relates to sites providing 1 - 14 dwellings and requires the provision of differing proportions of affordable housing depending on the size of the site with the amount decreasing from 30% to 10% as the total number of dwellings falls. This takes into account the differing viability of developing sites of different sizes. Policy DM7 relates to accommodation for vulnerable people which will often be provided as affordable housing.
- 2.5 The various relevant adopted policies are accompanied by supporting text that provides some guidance on the implementation of the policies.

The National Planning Policy Framework (NPPF)

- 2.6 The NPPF indicates that where a local authority has, *"identified that affordable housing is needed,"* it should, *"set policies for meeting*

² LDF Core Strategy, RBC, 2008 see: [Core Strategy, Adopted January 2008](#)

³ LDF Sites and Detailed Policies Document, RBC, 2012, see: [Sites and Detailed Policies Document, Adopted October 2012](#)

this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.”
(Paragraph 50)

- 2.7 The Glossary to the NPPF defines affordable housing (the relevant extract from the NPPF is copied at Appendix 1 to this document).
- 2.8 Paragraphs 173-174 refer to viability. The provision of affordable housing has an impact on the costs of development and thus viability. Viability has been taken into account in the preparation and examination of the development plan policies. Both policies CS16 and DM6, however, allow for viability considerations to be taken into account in the implementation of their requirements in relation to individual schemes. The SPD has been formulated to ensure that the guidance interprets the relevant development plan policies in the light of the guidance in the NPPF and the provisions in the CIL Regulations.

3.0 Housing Need in the Borough

- 3.1 Various assessments over the years have pointed to a very high level of need for affordable housing in the borough. The latest 2011/12 assessment⁴ shows a continuing very high level of existing and newly arising need⁵ that would easily take up all of the anticipated housing provision in the Borough up to 2026.
- 3.2 The Council maintains the Housing Register for the Borough and monitors and manages allocations. The Council will use this and other available evidence to advise on the strategic mix of dwelling sizes required on new housing developments to meet Housing Strategy objectives. In terms of allocations, there is a high need for social rented housing⁶ (or support through housing benefit). There is a particular need for housing for families (defined as households with children living in overcrowded conditions) who are generally the highest priority for housing.
- 3.3 New employment development can add to pressures on the housing market in the area, particularly on affordable housing. The lack of affordable housing has long been, and remains, a concern in economic development strategies covering the Reading area. It is seen as a significant constraint to new employment investment in the area. Increasing affordable housing provision is seen as critical to enable economic growth in the area.⁷

4.0 The Provision of Affordable Housing as Part of Development Proposals

Target figures for affordable housing provision

- 4.1 The Council's Housing Strategy (2009-2013) refers to achieving a target of 40% of all new homes in the town to be affordable housing. Core Strategy Policy CS16 seeks a target 50% provision on sites of 15 units and above to help to meet locally identified needs. Policy DM6 seeks lesser proportions of affordable housing provision on sites of less than 15 units related to an assessment of the viability of different sizes of development in the Borough, prepared as background evidence to the policy. The intention remains to achieve an overall target of 40% of all provision in the Borough as affordable housing.

⁴ DTZ; Housing Need Assessment and Affordable Rent Review, Five Berkshire Authorities, 2012.

⁵ Defined in the glossary to the NPPF as: "eligible households whose needs are not met by the market." See Appendix 1 to this document.

⁶ Social rented housing is defined in the glossary to the NPPF. See Appendix 1 to this document.

⁷ See Core Strategy Employment Background Paper,

http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/20363/Submission-Employment-Background-Paper.pdf

4.2 All parts of the Borough are suitable for accommodating affordable housing. The policy therefore applies to all developments providing residential dwellings. The policy relates to the total gross number of dwellings provided on the site. There is no allowance for the replacement of existing dwelling units on a site. However, the existing use value will form part of any consideration of viability of the development in the negotiation of affordable housing and other planning obligations. Existing dwellings retained as single dwelling units as part of any scheme will not count against the affordable housing requirement. The policy will not be applied to student accommodation unless this is being developed on an allocated housing site or a site where residential development would have been anticipated. Similarly, an affordable housing requirement will not be applied to apart-hotel developments unless:

- they are being developed on an allocated housing site or a site where residential development and affordable housing provision would have been anticipated; and
- arrangements for accommodation within an apart hotel allow tenancies of more than 3 months.

4.3 Under policy CS13 of the Core Strategy, contributions towards affordable housing provision will be sought as part of major commercial proposals involving significant net additional employment. For B1 (a) office development this would be developments of greater than 2,500m² net additional floorspace; for other forms of employment development (i.e. other B use classes) this will involve higher levels of floorspace applying relevant employment densities.⁸ The affordable housing contribution will be calculated on the basis of an appropriate proportion of the additional housing need arising from the anticipated level of employment, sufficient to mitigate impacts on the need for affordable housing arising from the development. More details on the calculation of the contribution to be made by employment development are provided in Appendix 2.

Form of provision

4.4 The policies seek on-site provision of the affordable housing but do allow for varying forms of provision. Under Policy CS16, on site provision (either serviced land or completed units) will be the normal expectation. However, in exceptional circumstances, the Council will consider provision on a surrogate site or sites (again, either serviced land or completed units). A financial contribution/commuted sums may, exceptionally, be acceptable. Guidance on how to calculate any

⁸ See HCA, Employment Densities Guide, 2010 (2nd Edition);

financial contribution can be found at paragraphs 4.27 and 4.28 below.

- 4.5 Under policy DM6, the local planning authority's preference will always be for on-site provision, and this will remain the expectation for sites of more than 5 dwellings. However, for sites of 5 dwellings or less, or for sites of 5-9 dwellings where there are good reasons, the local planning authority will be flexible about the provision of affordable housing on a surrogate site or via a contribution/commuted sum that will enable the required provision to be funded elsewhere. The calculation of any financial contribution is discussed at paragraphs 4.27 and 4.28 and Appendix 4 below.
- 4.6 In the case of commercial-only sites, where relevant, affordable housing contributions will generally be taken in the form of commuted sums.

Application of Affordable Housing Policies to types of residential development that do not involve new build housing.

- 4.7 Policies CS16 and DM6 refer to, "All developments..." and "On development sites of less than 15 dwellings,....," respectively. The policies are, therefore, relevant to all forms of residential development including developments that do not involve new build residential units. Building conversions therefore fall to be considered under these policies, particularly Policy DM6. This covers proposals to convert houses to flats, or the conversion of commercial and other non-residential floorspace to residential use, where additional self-contained residential units are being provided. The policies will not apply to the change of use of a single dwelling house to a house in multiple occupation, where unrelated residents live communally and share common facilities within the single residential property.

The definition of affordable housing

- 4.8 The Glossary to the NPPF defines affordable housing as including the following types of housing tenure:
- Social rented;
 - Affordable rented; and
 - Intermediate housing.

The definition specifically excludes low cost market housing⁹. The NPPF definition goes on to state that, "Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision."

⁹ See Appendix 1 to this document for an extract from the Glossary to the NPPF.

- 4.9 Affordable Housing is defined in the adopted Core Strategy as subsidised housing that enables the asking price or rent to be substantially lower than the prevailing market prices or rents in the locality, and which is subject to mechanisms that will ensure that the housing remains affordable for those who cannot afford market housing.
- 4.10 The above definitions will include provision for those on low incomes, those, such as defined key workers whose earnings are insufficient to enable them to afford market price housing, and households with special/supported housing needs such as those in need of NHS Care or other forms of community care. It will include the forms of housing for vulnerable people referred to in policy DM7 where such housing is being provided as affordable accommodation.

Affordable Housing - Tenancy types

- 4.12 Reading Borough Council recognises the government drive to introduce Affordable Rent as the tenancy model for Registered Providers.¹⁰ However the Council remains committed to ensuring that affordable housing remains affordable to those on the lowest incomes. Affordable Rents at the maximum rent of 80% of market rent will often be too expensive for many of those identified as in housing need in Reading. Therefore, the principles set out below provide clear direction on the Council's expectations of Registered Providers when setting rent levels.
- 4.13 The Council has identified a significant priority for larger family housing of 3 or more bedrooms let on the basis of social rented (i.e. at target rent levels) housing. Affordable Rent can only work for these properties if it is set at low percentages of market values either at or approaching target rents.
- 4.14 The largest need is for smaller accommodation (1 or 2 bedroom). For these properties, lettings at target rents would be the preference to meet the most urgent needs. However, elements of intermediate housing (such as shared ownership) products and affordable rent at up to 80% of market rents will assist in meeting needs in properties of this size.
- 4.15 New development should therefore include a range and mix of tenures of affordable housing (as appropriate depending on site size) to reflect local needs as indicated in the Berkshire Housing Market Assessment 2007 and the more recent Berkshire Housing Need Assessment (2012). The following targets for tenure types will be sought:

¹⁰ Registered Providers are classified as non-profit organisations or profit-making organisations. They are providers of social housing registered with, and regulated by, the Tenant Services Authority.

- 50% social rented housing at target rents or Affordable Rent housing of no more than 50% market rents;
- 50% made up of a mix of:
 - Intermediate housing, e.g. shared ownership; and
 - Affordable Rent Housing at rents of less than 80% market rent and, preferably significantly below the 80% market rent level.

Where 3+ bedroom accommodation is being provided, the Council's very strong preference is for this to be let at target rents.

Affordable Housing - Sizes of Provision

- 4.16 In order to meet identified priority needs for affordable housing, new developments providing affordable housing in compliance with policies CS16 and DM6 shall include a range and mix of types and sizes of affordable housing (as appropriate depending on site size). The range and mix should provide for identified local needs, meet the requirements of Policy DM5 in the Adopted Sites and Detailed Policies Document and reflect the range and mix of house types in the scheme as a whole (i.e. the mix of dwelling sizes in the provision of affordable housing should reflect the mix proposed for the private housing). There is a need for a mix of 1, 2, 3 and 4 bedrooms and some even larger accommodation in the provision of affordable housing. Within this range, larger 3 and 4 bedroom family accommodation is a significant priority along with the other forms of housing indicated below.

Priority Housing Needs

- 4.17 Housing Waiting Lists, Registers and the Council's Tenancy Strategy point to the following finer grained priority affordable housing needs:
- Disabled persons units + other specialist properties such as properties with a bedroom and bathroom downstairs for those families coping with a disabled adult in the house;
 - Large, affordable, 4 bed & above houses;
 - Disabled adapted housing especially to meet needs of disabled children;
 - 1 bed flats in blocks of not more than 6 for vulnerable singles;
 - Pepper potted small flats on section 106 sites;

- Shared ownership is an option for Learning Difficulty clients and physically disabled people;
- Bungalows with flexible use e.g. flat for carers;
- Elderly person accommodation including (extra) care homes and sheltered accommodation.

Other needs and priorities will from time to time be detailed and changed through the Council's Housing Strategy. The Council will, from time to time, publish additional information on the nature of the affordable housing being sought to meet identified needs.

Securing long term use of affordable housing

- 4.18 In accordance with the definition in the NPPF (Annex 2), any affordable housing provided should remain at an affordable price for future eligible households, or mechanisms should be provided to enable the subsidy to be recycled for alternative affordable housing provision. The Council believes that most effective way of doing this is through a Registered Provider (RP) such as a housing association (HA) or direct provision by the local authority. The Council will generally prefer to secure provision of affordable housing through a Section 106 agreement. Where a partner Housing Association is involved it will usually be party to the agreement and should be involved as early as possible in pre-application discussions. Section 106 Agreements will be formulated against the provisions and assumptions agreed at the time of determination of the application.
- 4.19 On residential-only and mixed-use sites, the Council will normally wish to see the developer transfer the freehold interest in serviced land or completed units (whether on the application site or a surrogate site) to a registered provider. In some cases, a 999-year lease may be more appropriate. Where it is proposed that the completed units are not to be transferred to a registered provider, the Council will need to be satisfied that, in accordance with the definition of affordable housing in the NPPF, provisions are in place to ensure that the affordable housing will remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. This will usually take the form of restrictive covenants within any planning obligation agreement.
- 4.20 Reading Borough Council currently operates within the context of a "joint-commissioning agreement". This involves the Council, the Homes and Communities Agency (HCA - the Government body which registers, funds and scrutinises Housing Associations), and a number of "preferred-partner" registered providers. The Council and the HCA jointly choose the registered provider partners.

- 4.21 A central tenet of joint commissioning is that, generally, only funding bids for grants from the selected registered providers will be supported, including for those affordable housing schemes that have been secured by planning obligation. It therefore follows that developers are strongly recommended to work with the Council's joint commissioning registered providers, even where public funding is not available or not being sought. However, in providing this advice it is accepted that affordable housing provided as part of planning proposals are rarely likely to receive grant funding. Nevertheless, there are many good reasons why developers should consider using joint commissioning registered providers in the first instance when considering providers of such housing.
- 4.22 In the case of commuted sums received in place of on-site provision, the Council will choose the registered providers to which to direct the funding for the provision of affordable housing.
- 4.23 If, in any type of scheme, it is proposed that a registered provider is *not* to be involved in the management of affordable housing, the Council will usually secure the provision of affordable housing for successive occupants through the use of planning obligations, restricting occupancy to households who cannot compete in the housing market.

Conversions upon re-letting

- 4.24 Appendix 3 sets out relevant information and advice for developers/ applicants/ registered providers from the Reading Borough Council Tenancy Strategy¹¹ relating to tenancy agreements and the management of affordable housing by Registered Providers following its provision.

Design and Standards of Housing

- 4.25 The design/construction of the affordable housing should be in-keeping with the character, appearance and quality of any sale housing on the site. The Council expects new affordable housing to meet the Homes and Communities Agency (HCA) Design and Housing Quality Indicators (HQI). These standards cover areas including unit floorspace and room sizes, appropriate amenity space, car parking provision, wheelchair and disabled access, standards of finish and furniture, sustainability, and Building for Life, etc. Units to be transferred to a registered providers should, as a minimum, meet the HCA HQI standards¹², as well as the Council's planning requirements,

¹¹ RBC, Tenancy Strategy 2013 - 2018 (2013) see: <http://www.reading.gov.uk/residents/Housing/HousingStrategiesandPlans/tenancy-strategy-2013-2018/>

¹² See <http://www.homesandcommunities.co.uk/hqi> for further information including a learning module that explains the HCA's justification for their standards.

in particular Core Strategy policies CS1, CS7, DM4, 5, and 10. HQI standards will generally need to be provided for a scheme if it is ever to be considered for grant funding.

Provision of Affordable Housing on Surrogate Sites.

4.26 Where the Council has accepted an argument that there are exceptional circumstances that mean that it would be beneficial and preferable for the affordable housing required as part of the development to be provided on a surrogate site, the Council will expect that:

- The affordable housing provided on the surrogate site will normally be of similar style and quality as the housing that is being provided on the principal site;
- The mix of affordable housing types and sizes provided on the surrogate site will be similar to the affordable housing that would have been provided on the principal site;

unless there are good reasons for providing a different product on the surrogate site.

Financial Contributions/Commutated Sums in lieu of on-site provision.

4.27 For sites of 15 dwellings and above, the council accepts that there may be exceptional circumstances where on site provision is not practical. Where the opportunity to provide affordable housing on a surrogate site is not available, the council will accept a financial contribution/commuted sum in lieu of on-site provision. In the case of sites providing less than 15 units, policy DM 6 allows provision in certain circumstances to be made in the form of a financial contribution. Similarly, for provision made under policy CS13 in relation to the impacts of major employment development, the council will accept direct provision or a commuted sum.

4.28 Any financial contribution should be broadly equivalent to the contribution that would have been made to provide the housing on-site. It should be of a size that will enable a registered provider or the council to provide a dwelling of an appropriate size at an appropriate rental level to meet the identified need. The level of financial payment that the Council considers appropriate will change over time in response to a range of factors. Further information is set out in Appendix 4 to this SPD which indicates how a financial payment/ commuted sum will be calculated. This Appendix will be updated, as appropriate.

Viability of Provision

- 4.29 The Council has been, and will continue to be, willing to consider a range of matters, in particular the viability of individual schemes, in coming to a reasoned judgement on the level of affordable housing that is appropriate on individual developments. It accepts that in the current economic climate and funding regime for affordable housing, the 50% target for affordable housing under policy CS16 will be difficult to achieve.
- 4.30 Similarly the target figures for sites of 10-14 units (30%), 5-9 units (20%) and 1-5 units (10%) were based on returning to the level of viability that existed in 2007. It is accepted that the decline in economic conditions meant that in 2009, when the market was more or less at its lowest point in recent years, those targets would be less easy to achieve and that the return to 2007 levels of viability will be relatively slow.
- 4.31 The Council will assess the viability of the level of provision and the likely level of cost to developers and landowners in terms of:
- the costs of bringing sites in Reading to the market, including the implications of competing land uses;
 - realistic assumptions on the levels of public subsidy likely to be available for affordable housing (which are likely to remain very low or non-existent for Section 106 sites); and
 - the need for the proposed development to be attractive to the lenders of private finance;
 - the need to provide competitive returns to a willing land owner and willing developer, as verified by an independent valuation to enable the development to be deliverable.

In assessing viability, the Council will have regard to other guidance on viability in the NPPF at paragraph 173 so that applications are considered in the light of that guidance.

- 4.32 The Council will be sensitive to exceptional costs of bringing a site to market such as for reasons of expensive reclamation or infrastructure costs, or high existing use values such as in the case of re-using office accommodation. Where applicants can demonstrate, to the satisfaction of the Council, exceptional difficulties in bringing a site to market, it will be prepared to consider detailed information on the viability of a particular scheme and, where justified, to accept a level of affordable housing below the target requirement set out in the relevant policy. However, as development costs are usually reflected in the residual land value, the purchase price of a particular site will not, on its own, be a reason for reducing the affordable housing requirement.
- 4.33 The economics of the provision of affordable housing is complicated. Public subsidy is now very limited and the rules suggest that it will

rarely be available for sites providing affordable housing as a result of a Section 106 agreement. The Council will, where appropriate, therefore take account of the availability of public subsidy and, where it is not available, or only at low levels, will be prepared to adjust its expected provision of affordable housing accordingly.

- 4.34 Adjustments to normal requirements on the grounds of viability need to be transparent and fully justified. Such adjustments can only be considered as a result of a full open book residual valuation assessed by the Council's Valuer or his/her nominee. The open book accounting should be set out to reveal the residual valuation for the application site taking account of abnormal costs, including Section 106 requirements. The Council's Valuer will advise the Planning Applications Committee or Planning Section of the results of his or her assessment.
- 4.35 Appendix 5 to this SPD provides an information sheet indicating the information and level of detail that will be required in order to provide a proper viability appraisal of a proposal that can be readily assessed by the Council. It notes that less detailed information can be provided for smaller sites of less than 10 dwellings.
- 4.36 In exceptional cases, on larger developments (of 15 dwellings and above) and if a case can be made by the applicants, the Council may be prepared to grant planning permission for schemes where the provision of an element of the required affordable housing provision is deferred. This will be dependent upon economic conditions improving before the development is completed. Such arrangements will be considered on a case by case basis taking account of all other relevant material planning considerations.

Viability in relation to Policy DM6

- 4.37 In the current economic circumstances, it is accepted that the viability of development has reduced since 2007, although it has stabilised since the low point of the recession during 2009. It is accepted that achieving the policy targets will be very difficult in some circumstances. However, the assumption is that the economy will gradually move out of recession and into more buoyant conditions. As this happens, it is anticipated that the viability of development will support the target levels set out in the policies. In the meantime, the Council acknowledges that the viability of individual sites will need to be considered on a case by case basis, having regard to economic conditions at the time the planning application is determined.
- 4.38 The text to policy DM6 (paragraph 4.2.9) indicates that "...it is intended that some additional detail on the provision of affordable housing will be provided.....This might include details of how economic conditions and other factors are accepted as affecting the viability of development at a particular point in time." The Inspector's Report on

the examination of the Sites and Detailed Policies Document noted that the policy will be applied flexibly to take account of market conditions or difficulties on particular sites.

- 4.39 Given the current (2013) economic circumstances, the Council accepts that it is possible that the levels of affordable housing or financial contribution that can be achieved by schemes may not meet the targets indicated in policy DM6. Therefore, subject to assessments of submitted viability appraisals and arguments, the Council will be prepared to accept applications on the basis of providing a reasonable level of affordable housing in the prevailing economic circumstances, considered on a case by case basis at the time the application is assessed. Appendix 5 to this SPD provides an information sheet indicating the information and level of detail that will be required in order to provide a proper viability appraisal of a proposal that can be readily assessed by the Council. It notes where less detailed information can be provided for smaller sites of less than 10 dwellings.

5.0 Procedures

- 5.1 The provision of affordable housing will normally be secured through a Section 106 agreement. The target timescale for determining planning applications is 8 weeks for minor applications, and 13 weeks for major applications (16 weeks if the development involves an Environmental Impact Assessment). In 2012, the government introduced the “Planning Guarantee” whereby an application should not take longer than 26 weeks to be determined unless the applicant has entered into a Planning Performance Agreement (PPA) with the Council in which case a bespoke timescale is agreed. This means that it is advisable for heads of terms for Section 106 agreements to be discussed and documented prior to the submission of any planning application. The Council encourages pre-application discussions. One reason is to ensure that the process of agreeing, drawing up and completing agreements is well advanced and they can be agreed and signed within the planning application determination period. Applications may be refused where agreements are not ready to be completed within the determination period.
- 5.2 The Council will process negotiations and agreements on planning obligations in a positive and proactive manner and as quickly as is reasonable. However, it can be a complicated legal process and ample time needs to be available to complete the process. To this end, the Council has drawn up standard clauses to be used in any draft legal agreement to assist the processing of applications. Applicants will need to brief their own legal advisors early in the pre-application process.
- 5.3 Where an agreement is required, applicants will need to provide the following information, as set out in the RBC Planning Application Checklist (this document can be found on the RBC website at <http://www.reading.gov.uk/General.asp?id=5X8838-A77FA4A7&cat=932>)
- (i) proposed heads of terms of the legal agreement;
 - (ii) copies of the “title deeds”;
 - (iii) in the event that there are any charges, mortgages or other securities secured on the land, the names and addresses of the chargees/mortgagees/holders of the security (since it will be necessary for any such to be joined as parties to the agreement and/or consent to its terms or execute a Consent to Dealing as appropriate);
 - (iv) an undertaking to pay the Council’s appropriate legal costs in connection with the preparation of the legal agreement;

- (v) in the event that the applicants are represented by solicitors, the relevant contact address and name of the solicitor/person dealing with the matter.

- 5.4 Details should be included as part of the application to ensure that it is clear what is being offered by the development so that interested persons are aware of the full picture. The Council will provide applicants with a timetable for completing actions so that planning applications can be determined within the specified target period. Failure to provide this information may result in the application being refused if inadequate time is available to complete the agreement.

- 5.5 Payment of contributions will generally be sought either upon commencement of development or on occupation unless it is agreed that an alternative stage in development is appropriate and acceptable. For larger scale proposals, in order to assist the viability and delivery of the scheme, the Council may agree to staged or deferred contributions. These might be linked to different phases of the development or stages in the implementation of the scheme. Payments will (where appropriate) be index linked to the Retail Prices Index from the date of the agreement.

Extract from the National Planning Policy Framework

“Annex 2: Glossary

Affordable housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.”

Appendix 2

Affordable Housing and Employment Development

Background evidence to the Reading Borough Local Development Framework and more recent evidence points to a growing gap between the numbers of economically active in the job market and the numbers of jobs in the area. Further employment development that is not already committed (i.e. has planning permission at March 2011) will add to that gap, leading to pressure on local housing from employees moving to the area to be near to their jobs and/or long distance commuting. Such development is not therefore sustainable unless it is appropriately mitigated.

Applicants should provide an employment impact statement setting out the net increase in employment numbers arising from the development, and its consequent impact on housing in the local area. Applicants will put forward how they expect labour to be sourced

In terms of housing impact, a proportion of the housing need generated by the additional employment might be taken up by:

- Slackness in the economy at the time (e.g. unemployed or underemployed persons who already have housing);
- Employees who can access housing capacity being provided as part of local plans for adjoining districts that won't be taken up by new employment growth in those districts.
- The planned loss in employment floorspace in the plan and as a result of changes of use, particularly the loss of offices under the new 2013 permitted development regime.
- Allowance for some employees gaining access from further afield via sustainable transport modes, e.g. trains and buses.

While the analysis is that all additional floorspace arising from new commitments gaining permission after March 2011 will add further to the already wide gap, this can be discounted by an amount (we are working on a generous 50%) to allow for the above flexibilities/capacities. The remaining 50% additional floorspace will be assumed to have direct impacts on housing pressure in the Borough. For Reading, the lower paid face higher prices and higher competition for housing that they can afford, and cannot afford commuting costs. Such households will not access suitable employment, adding to labour and skill shortages in the area, unless they can gain access to affordable housing.

The Council seeks to achieve a target of 40% of overall additional housing as affordable housing. However in the current market in relation to employment development, any provision would need to be negotiated taking scheme viability into account.

Therefore the calculation to mitigate the employment impacts of new additional employment floorspace will be:

1. Calculation of additional floorspace divided by the density of employment for that use and location (e.g. 21m² per employee in a town centre location);
2. Multiply by 50%, allowing for flexibilities and capacities in the local market to estimate the net increase in employment that will add to the employment gap;
3. Divide by 1.317 (factor for number of jobs/households) to determine how many households that level of employment will result in.
4. Multiply by x% to estimate the number of affordable housing units that should be provided to mitigate the impact (subject to scheme viability assessment).
5. Calculate the contribution based on the average cost for an RSL to provide a single unit of affordable housing in Reading (at 2013, this is in the region of £80,000 but an exact figure should be agreed with the Council's Valuer)

Example Calculation

The calculation for an additional 10,000m² (gross) office floorspace in the Centre of Reading would be as follows:

1. 10,000m² divide by 21 = 476 employees
2. X 50% to account for flexibilities = 238 (net addition to the employment gap)
3. Divide by 1.317 (for households) = 180
4. X x% (affordable housing target) (for example 10% taking scheme viability into account) = 18 units
5. X £80,000 = £1,440,000 (or £144 per m²).

That figure can be weighted against any housing/affordable housing being provided as part of the scheme and other factors that the applicant wishes to rely upon.

Affordable Housing SPD

Relevant Advice from the Reading Borough Council Tenancy Strategy Relating to the Management of Affordable Housing by Registered Providers.

Under its Tenancy Strategy (2013)¹³, the Council expects affordable housing providers to only let 1 and 2 bed properties as Affordable Rent, and to ensure that rents charged do not exceed the lower of the following two criteria:

- The relevant Local Housing Allowance (LHA) rate that is applicable for that property size, at the time of rent setting;
- The amount assessed by the registered provider as affordable in the local area at the time of setting the rent.

Conversions upon re-letting

Under its Tenancy Strategy, the Council expects Registered Providers to re-let properties with three bedrooms or more at target rents and not to convert them on re-let to affordable rents. Housing providers are also expected to continue to re-let properties that provide supported accommodation for older people, such as sheltered or care housing or housing that has been adapted, at target rents and not to convert them on re-lets at affordable rents.

For other properties and smaller 1 and 2 bedroom dwellings, the Council wants to avoid scenarios where particular localities experience a disproportionately high level of conversions to affordable rent, thus limiting the opportunities available for existing social rented tenants to transfer to areas of their choice and retaining a traditional rent level (target rent). Registered Providers should therefore be mindful of the impact of conversions upon the tenure profile and overall sustainability of the communities within which they operate.

The Council expects conversions from social rented properties to affordable rent properties at the point of re-let to be based on the agreed contract with the HCA and that those agreed numbers be shared with the Council in order for effective monitoring to take place.

¹³ RBC, Tenancy Strategy 2013 - 2018 (2013) see:
<http://www.reading.gov.uk/residents/Housing/HousingStrategiesandPlans/tenancy-strategy-2013-2018/>

Appendix 4

The Calculation of Financial Contributions/Commutated Sums in lieu of on-site provision.

Any financial contribution should be broadly equivalent to the contribution that would have been made to provide the housing on-site. It should be of a size that will enable a registered provider (RP) or the Council to provide a dwelling of an appropriate size and tenancy at an appropriate rental level/cost to meet the identified need. A registered provider (for example a housing association) can borrow against rental streams and use their own resources to purchase completed units. However, it can only afford a proportion of the market value of the completed unit. In order to be able to provide a dwelling, the registered provider will require a financial subsidy equal to the proportion of the market value that it cannot afford. The financial contribution being sought in lieu of on-site provision will be broadly equivalent to this amount and is based on the general ability of an RP to purchase in the current market.

In 2013, the evidence in the market place generally is that a registered provider would be able to fund approximately 50% of the market value of a unit and would generally need a financial contribution of 50% of the market value in order to provide each unit. The figure will vary to some extent depending on the size and tenure (target rent, affordable rent, intermediate housing) of the affordable unit being provided. However, the figure of 50% market value of a unit provides an indication of the general level of contribution that will be needed to provide one unit by an RSL in the current market.

The 50% figure is derived from the price that a registered provider (RP) can afford to pay expressed as a proportion of open market value, making allowance for commuting the affordable tenure off site and acknowledging design factors such as the Code for Sustainable Homes, Lifetime Homes and Housing & Communities Agency (HCA) design space standards, which may vary between private and affordable units.

Policy DM6 will be implemented as follows:

Scheme 1-4 units - Policy DM6 seeks 10% affordable housing as a financial contribution/commuted sum.

The most appropriate way to calculate the contribution is to calculate the Gross Development Value (GDV) of the entire proposed development. The financial contribution will be directly proportionate to the GDV of the scheme assuming it is 100% private sales, and will equate to a payment of 5% of that GDV.

A Worked Example:

A scheme of 3 houses:

GDV @ £200k per house = £600k

| | |
|--------------------------------|-----------------|
| 10% Affordable Housing element | = £60k |
| RSL purchase at 50% | = £30k |
| Residual commuted sum | = £30k = 5% GDV |

Schemes of 5-9 and 10-14 units

Policy DM6 seeks an onsite contribution of 20% and 30% respectively for schemes of 5 units and above made up of a combination of on-site provision and commuted payments depending on the nature of the scheme.

Where a combination of provision is necessary the Applicant will identify the required proportion for on-site affordable housing and calculate the remaining commuted sum based on 50% of the GDV of the remaining percentage required to meet the policy target.

Worked Examples:

A scheme of 9 houses (20% affordable housing requirement)

20% of 9 units is equivalent to 1.8 units.

This equates to 1 unit on site and 80% of 1 unit in the form of a financial contribution.

The units are worth £200k each as private sales. 80% of a unit equates to 8.89% ($0.8/9 \times 100$) of the total GDV of the proposed development.

If the GDV of the total proposed development is £1.8m ($9 \times £200k$) then 8.89% equates to £160k, the resulting financial contribution, at 50%, would amount to £80k.

If it was accepted that exceptional circumstance exist and that the whole contribution can be taken as a financial contribution, the calculation would be as follows:

| | |
|--------------------------------|-------------------|
| GDV for 9 houses at £200k each | =£1,800k |
| 20% Affordable Housing element | = £360k |
| RSL purchase at 50% | = £180k |
| Residual commuted sum | = £180k = 10% GDV |

If the number is increased to 14 units, all units should be provided on site but if it was accepted that exceptional circumstance exist and that a commuted sum was therefore acceptable, it would be calculated as follows:

| | |
|---------------------------------|-------------------|
| GDV for 14 houses at £200k each | =£2,800k |
| 30% Affordable Housing element | = £840k |
| RSL purchase at 50% | = £420k |
| Residual commuted sum | = £420k = 15% GDV |

Appendix 5

Information Requirements for a Viability Assessment to Support a Planning Application.

If an application falls to provide affordable housing under policies CS16 or DM6, and the applicant proposes not to meet the target requirements or the proportion of affordable housing that should be provided, the applicant will need to make a reasoned case as to why the requirement should not apply in full to the application proposal. That case may relate to viabilityⁱ in which case the policy sets out that, "...an open book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing threshold."

As part of any affordable housing viability submission the Applicant will be required to submit the supporting information set out below. Not all the information will be required for small schemes of less than 10 units. Some of the information in Tables 2 and 3 would not necessarily apply to such schemes. However, applicants will need to be clear on the form as to why that information is not relevant to considering the viability of their schemes.

TABLE 1: Supporting/contextual Information

| | Item | Other Details | Details of Information Provided to the Local Authority |
|-----|--|--|--|
| 1.1 | A site plan with building footprints | At 1:500 Scale. | |
| 1.2 | Gross and Net (where applicable) site area | In Hectares (ha). | |
| 1.3 | Schedule of existing floorspace where applicable along with details of recent use. | Areas measured and provided in accordance with the RICS Code of Measuring Practice | |

| | | | |
|-----|---|---|--|
| 1.4 | Schedule of the number of units proposed along with unit sizes, | Also provide information on the no. of habitable rooms/bedrooms. | |
| 1.5 | Outline of case as to why policy target provision of affordable housing cannot be achieved. | e.g. abnormal site contamination or other adverse conditions, abnormally expensive infrastructure requirements, site not suitable (with full explanation), viability in current market conditions, etc. | |

TABLE 2: Component parts of a Development Appraisal in the form of a Residual Valuation demonstrating viability and deliverability of the proposed scheme¹⁴.

| | Item | Other Details | Information Provided to Local Authority |
|----|--|---|---|
| 1. | Value of Private Sale Units | Scheme specific estimated “achieved” sales values - total and individual values for different dwelling types - accompanied by independent supporting evidence or benchmarked against Land Registry values; | |
| 2. | Value of the affordable housing provision and the calculation of any commuted sum in complying with Policies CS16 and DM6 | Assumptions as to the proposed unit types, tenures and values of providing the affordable housing or the contribution proposed in lieu of provision on site as allowed under Policy DM6 Include details of tenure assumptions and evidence or estimates of RSL offers where | |

¹⁴ The specification is partially based on the headings contained in Annex A of DCLG, “Section 106 affordable housing requirements, Review and Appeal,” April 2013ⁱ, supplemented by regard to RICS, “Financial Viability in Planning,” 2012ⁱⁱⁱ.

| | | | |
|----|---|---|--|
| | | appropriate. | |
| 3. | Details of any grants/non developer financing towards affordable housing provision | e.g. HCA or local authority grants, charitable funding, direct and indirect funding from the partner registered housing provider | |
| 4. | Other Values generated by the scheme | e.g. the value any non-residential uses, any ground rents, car parking, temporary income, etc. | |
| 5. | Gross Development Value | The total of Items 1-4 | |
| 6. | Marketing/Sales costs | Costs of agents, advertising, etc. Legal Fees for the sale of units. | |
| 7. | Net Development Value | Gross Development Value less the Marketing/ Sales costs listed in 6. | |
| 8. | Estimated Building Costs. | Building Costs should be Building Costs Information Service (BCIS) or, if in excess of these costs, supported by Tender costs or a Quantity Surveyor cost report showing how costs have been estimated and assessed against comparable market evidence. Include separate costs related to complying with BREEAM and Code for Sustainable Homes standards where these exceed the costs of complying with the | |

| | | | |
|-----|------------------------------------|---|--|
| | | Building Regulations. | |
| 9. | Itemised Preliminary Costs. | <p>Site specific preparatory costs which may include demolition and other works arising from ecological, geotechnical, archaeological and other site investigations. These would be expected in normal circumstances to be reflected within the purchase price.</p> <p>Preliminary costs/work including site clearance/preparation, infrastructure and servicing, site set up and contractor/contract preparation. These may need to be verified by independent cost consultants.</p> | |
| 10. | Abnormal Construction Costs | <p>Abnormal costs are dependent on site specific circumstances and may include decontamination, land stabilisation and land forming or raising. Site specific evidence (cost estimates by independent cost consultants or invoices), benchmarked against comparable evidence, should be submitted where relevant and available. In some cases these will be reflected in the market value and care will need to be taken to avoid double counting.</p> | |
| 11. | Contingency | <p>A development contingency allowance to cover unforeseen costs.</p> | |

| | | | |
|-----|---|---|--|
| 12. | Professional fees presented under each respective heading; | All related professional fees including architects, planners, engineering, QS, ecologists, arboriculturalists, project manager, CDM etc., individually listed and costed. | |
| 13. | Planning and other Obligations | The costs of delivering planning conditions or obligations in planning and highways agreements. | |
| 14. | Costs of Capital / Debt Finance on building works. | The cost and lending structure for borrowing money and any related arrangement fees to fund the site preparation, construction and all major capital costs and fees etc., including basis and ratios of debt and equity contributions, payback, bank terms etc. | |
| 15. | Estimated profit/ developers' rate of return | Provide context for and basis for measuring target return. Developers return (itemised including business costs, tax etc.) and including actual profit. | |
| 16. | Gross Land Value | Value of site prior to the deduction of land related costs (under 17 & 18 below). | |
| 17. | Related Land Costs and Fees | Incurred relevant costs and fees, These may include agents fees, legal fees, site promotion and other costs and fees, where appropriate. ⁱ | |
| 18. | Land Purchase Costs (including Taxes and Duties) | Including agents and legal fees on land purchase, financing costs, Stamp Duty Land Tax, VAT and other taxes together with any exemptions or tax efficient delivery vehicles | |

TABLE 3: Supplementary information to support Development Appraisal.

These details may not be essential in a viability appraisal for small sites of less than 10 dwellings.

| | Item | Other Details | Information Provided to Local Authority |
|-----|--|---|---|
| 19. | Construction timescales, programme and phasing | Proposed construction program. | |
| 20. | Detailed cashflow for the scheme | Showing the amounts and timings of all the income and expenditure forecasts and payments | |
| 21. | Salient terms of acquisition (e.g. subject to planning, soils, ground conditions survey, etc.); | Provide details of ownership. Include purchase process (e.g. private treaty, open market bid, auction, etc.), the basis of any purchase, e.g. outright purchase, option, contract, etc., and details of occupation and leases/ tenancies, or whether vacant possession. | |

TABLE 4: Comparison information benchmarking viability and deliverability of the proposed scheme and the Affordable Housing offer

| | Item | Other Details | Information Provided to Local Authority |
|-----|--|---|---|
| 22. | Land Value: | The land purchase price (benchmarked against both market values and sale prices of comparable sites in the locality). Any significant overbid on the site will be disregarded. | |
| 23. | Existing Use Value: | Supported by a detailed valuation; | |
| 24. | Summary of Calculation of Residual Valuation - with affordable housing provision in accordance with relevant policy (CS16 and/or DM6). | Based on the calculations and headings in Table 2 above and demonstrating the actual affordable housing offer with the full contribution being sought by the LPA. | |
| 25. | Evidence of sensitivity testing and checks being undertaken to verify the soundness of the judgements being taken on viability. | e.g. Different profit assumptions, comparisons with the sale price of land for similar development, etc. | |
| 26. | Comparison of Residual Valuation with Site Value | Site Value should equate to the market value ⁱⁱ providing that the value has regard to development plan policies and all other material planning considerations and disregards that which is contrary to the development plan. | |
| 27 | Affordable Housing contribution being offered | Assumptions as to the proposed unit types, tenures and values of providing the affordable housing or the contribution | |

| | | | |
|--|---|--|--|
| | <p>in default of full contribution under CS16 or DM6</p> | <p>proposed in lieu of provision on site as allowed under Policy DM6. Include details of tenure assumptions and evidence or estimates of RSL offers where appropriate.</p> | |
|--|---|--|--|

The required information will be submitted in a hard copy and digital form. It will provide a residual valuation in a format of the applicant’s choice and design showing the effect of the affordable housing requirement on the viability of the scheme. It should however relate to the headings in the above tables.

The residual valuation will be supported by a cashflow analysis. Valuations using standard viability models such as HCA, RICS, Three Dragons, etc., will be acceptable providing they provide all the above information and are supported by an appropriate cashflow analysis.

This information will be provided to the Local Planning Authority in its entirety with any planning application and preferably at the pre-app stage. It will generally be considered as confidential (i.e. it will not be displayed with the planning documents on the Council’s website and should therefore be provided as a separate document). However, applicants should note that any submitted information could be the subject to a request for information under the Freedom of Information Act and the Environmental Information Regulations. In the event of such a request, the Council will ask the applicant to be prepared to provide a clear statement as to why any information submitted to the Council should be exempt from disclosure under the Act. However, it will ultimately be for the Council to decide whether such a disclosure of information should be made in the public interest.

ⁱ Financial viability for planning purposes is defined as follows: ‘An objective financial viability test of the ability of a development project to meet its costs including the cost of planning obligations, while ensuring an appropriate Site Value for the landowner and a market risk adjusted return to the developer in delivering that project.’

ⁱⁱ The estimated amount for which an asset or liability should exchange on the valuation date between a willing buyer and a willing seller in an arm’s-length transaction after properly marketing and where the parties had each acted knowledgeably, prudently and without compulsion ensuring an appropriate Site Value for the landowner and a market risk adjusted return to the developer in delivering that project.’

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ENVIRONMENT, CULTURE AND SPORT

| | | | |
|------------------|---|--------------|--|
| TO: | STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT COMMITTEE | | |
| DATE: | 9 th JULY 2013 | AGENDA ITEM: | 11 |
| TITLE: | LOCAL DEVELOPMENT SCHEME | | |
| LEAD COUNCILLOR: | COUNCILLOR PAGE | PORTFOLIO: | REGENERATION, TRANSPORT AND PLANNING |
| SERVICE: | PLANNING | WARDS: | BOROUGHWIDE |
| LEAD OFFICER: | MARK WORRINGHAM | TEL: | 0118 9373337 |
| JOB TITLE: | PRINCIPAL PLANNER | E-MAIL: | mark.worringham@reading.gov.uk |

1. EXECUTIVE SUMMARY

- 1.1 Reading Borough Council has made good progress in producing planning policy documents, and is one of a minority of local authorities to have a full set of development plans in place. Nevertheless, the Core Strategy is now over five years old and the government has made substantial changes to the planning system including the publication of the National Planning Policy Framework (NPPF). As a result, a small number of our policies are susceptible to challenge on appeal. There is a need to review various parts of our evidence base and to reconsider policies in the light of the NPPF, which will mean production of a single Local Plan.
- 1.2 The first step in preparing a Local Plan requires a Local Development Scheme (LDS). The LDS is a programme tool, which sets out the planning policy documents that the Council intends to produce, and their purpose, timescales and geographical area. This report therefore seeks approval of a Draft LDS which shows the documents that the Council intends to produce over the coming years.

2. RECOMMENDED ACTION

- 2.1 That the Local Development Scheme (Appendix 2) be approved and brought into effect, and that it form the basis for production of planning policy, with effect from 9th July 2013.

3. POLICY CONTEXT

- 3.1 A Local Development Scheme (LDS) is a document setting out the local planning authority's programme for producing planning policy documents. It lists the documents that are to be produced, sets out their scope and purpose, and sets out the broad timescales for its production, including important milestones.
- 3.2 A LDS was produced in 2011, which set out the programme for producing a range of documents within the Local Development Framework. The Council made good progress on these documents, and since 2012 has a full set of development plan documents in place, with the exception of minerals and waste documents. In the light of various recent changes to the planning system, there is now a need to start to think about how and when these documents will be replaced or revised, and new documents created, and the LDS is the appropriate tool to manage this process.

4. THE PROPOSAL

(a) Current Position

- 4.1 The Council has produced a number of LDSs over the years. The latest was published in 2011, and previous versions were also produced in 2005, 2006 and 2007. Previous Local Development Schemes are available to view on the Council's website¹.
- 4.2 The 2011 LDS mainly lists documents that have now been produced and adopted, including the Core Strategy (2008), Reading Central Area Action Plan (2009), Sites and Detailed Policies Document (2012) and Proposals Map (2012), as well as various supplementary planning documents including briefs for specific sites. Some of the documents that the 2011 LDS listed but have not yet been produced (e.g. joint minerals and waste planning documents for Berkshire) are now unlikely to be produced as itemised and will require a different approach. There is therefore a clear need to produce a new version of the LDS.

(b) Option Proposed

- 4.3 The Committee is asked to approve the LDS, which is attached at Appendix 2. Once approved, there are no further procedural requirements other than publication of the document to make it available to the public. Previous LDS documents had to be approved by the Secretary of State, but that is no longer the case.
- 4.4 The LDS proposes the production of a number of planning policy documents over the coming years. The most significant is a Local Plan, to replace the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document. This will need to respond to the

¹ <http://www.reading.gov.uk/businesses/Planning/planning-policy/general-information-on-planning-policy--including-procedural-documents/lds/>

content of the National Planning Policy Framework (NPPF), as well as emerging priorities elsewhere, and this will mean that the following will be among the main areas for review:

- Level of objectively assessed development need that should be accommodated (housing, employment, retail, infrastructure, other uses);
- Location of development, including site allocations;
- Consider inclusion of minerals and waste policies;
- A strategy for the historic environment;
- Taking forward sustainable design and construction policies to take on the emerging requirements for zero carbon developments;
- Updated infrastructure provision policies to reflect changes to CIL and Section 106;
- Any changes to policies needed to reflect new permitted development rights (e.g. residential amenity and employment)

4.5 However, there will also be a significant number of policies in existing documents which are not likely to require a great deal of review, and, subject to consultation and Sustainability Appraisal, can be carried across to the Local Plan.

4.6 The LDS also proposes a number of other documents. This includes a revised version of the Statement of Community Involvement, the document that sets out how the Council will consult. It also includes a number of Supplementary Planning Documents, although some of these were already proposed in the previous LDS.

(c) Other Options Considered

4.7 There are four alternative options that could be considered;

- Not produce a new LDS;
 - Produce a LDS with more ambitious timescales for the Local Plan;
 - Produce a LDS with less ambitious timescales for the Local Plan;
- or
- Not produce a single Local Plan.

4.8 The option of not producing a LDS would not be appropriate, as it is specified in the Planning and Compulsory Purchase Act 2004 that local planning authorities should produce a LDS. It would give no certainty either to the Council as to what programme it is working to, or to important stakeholders about how and when it will have a chance to influence policy.

4.9 Producing a LDS with more ambitious timescales would be difficult, as it may mean rushing the critical task of gathering evidence, particularly on the need for development such as housing. Some of this information should be in place before the first consultation stage in order to give consultees a realistic set of choices for how policy could respond. In addition, a more ambitious timescale would not fit well with committee

timescales and may result in the less than ideal situation of consulting over the Christmas period.

- 4.10 Producing a LDS with less ambitious timescales would leave Reading for a longer period without planning policy in place to cover some important issues. This may leave the Council vulnerable to appeals, particularly as 'objectively assessed development needs' specified by the NPPF had not been set, and could therefore result in some loss of control over the form and scale of development. Lengthening the process could also mean less effective use of resources in the long term, as, for instance, evidence gathered to support an early stage of the document would need major updates before the document is finalised.
- 4.11 The option of not producing a single Local Plan would not be in line with the presumption in the NPPF that a single document should be the preferred approach. Producing a single document saves on resources and streamlines the process, as well as making Reading's planning policy simpler to understand.

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 The Local Development Scheme will contribute to achieving the following strategic aims, through production of planning policy to fulfil key aims:
- The development of Reading as a Green City with a sustainable environment and economy at the heart of the Thames Valley;
 - Establishing Reading as a learning City and a stimulating and rewarding place to live and visit;
 - Promoting equality, social inclusion and a safe and healthy environment for all.

6. COMMUNITY ENGAGEMENT AND INFORMATION

- 6.1 The Local Development Scheme is simply a programme for production of planning documents, and will not be subject to community engagement. However, the LDS does programme community involvement stages for a whole range of documents. One of the documents proposed in the LDS, early on in the process, is an updated Statement of Community Involvement (SCI). The SCI is a document that will set out how the Council will consult on planning policy documents and how developers will consult on major planning applications.

7. EQUALITY ASSESSMENT

- 7.1 The Scoping Assessment, included at Appendix 1 identifies that an Equality Impact Assessment (EqIA) is not required for the LDS, as there is no reason to believe that specific groups will be affected any differently from others by the LDS.

8. LEGAL IMPLICATIONS

- 8.1 The content of Local Development Schemes is specified in Section 15 of the Planning and Compulsory Purchase Act 2004, as amended by Section 180 of the Planning Act 2008 and Section 111 of the Localism Act 2011. Under the legislation, the LDS must list the development plan documents to be produced, set out their subject matter, geographical area and timescales, and which are to be prepared jointly.
- 8.2 The LDS has also had regard to the legislation on the process of production of the individual documents it lists, which is set out in the Planning and Compulsory Purchase Act 2008 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012.

9 FINANCIAL IMPLICATIONS

- 9.1 The production of the LDS itself will be funded from existing budgets and has no significant financial implications. The main financial implications of the LDS lies with the documents that the LDS proposes to prepare, in particular the Local Plan.
- 9.2 Production of planning policy documents is generally carried out within existing budgets, and this will largely be the case with the documents listed in the LDS. However, there are some elements of producing these documents that can have significant resource implications, depending on how they are carried out.
- 9.3 Consultation exercises can be resource intensive, particularly at early stages where the focus is on engaging as many people as possible, and on asking wide-ranging and open-ended questions. However, the Council is moving towards a consultation process based mainly on electronic communication, which will help to minimise resource costs. The LDS proposes a review to the Statement of Community Involvement, which will contain proposals on how consultations should be carried out and, where possible, resources minimised.
- 9.4 Another main area where there can be significant financial implications is in producing the evidence base, particularly where the use of external consultants is required. Some external consultants will be needed when considering matters such as housing need, minerals planning and retail need. Consultants will only be used where they genuinely represent the best option in terms of value for money. The Local Plan timescales have been set so that costs of these studies are spread out in order to better fit with existing budgets.
- 9.5 Finally, the other significant cost is a public examination, which will be required for the Local Plan and for the Community Infrastructure Levy. These examinations can cost tens of thousands of pounds. They are an inescapable fact of producing development plans, although the length and scope of these examinations can be minimised by seeking to resolve

objections before the examination, as well as by combining documents into one document with one examination, as is proposed with the Local Plan.

Value for Money (VFM)

- 9.6 The preparation of a robust set of planning policy documents, as set out in the LDS, will ensure that developments are appropriate to their area, that significant effects are mitigated, that contributions are made to local infrastructure, and that there are no significant environmental, social and economic effects. Robust policies will also reduce the likelihood of planning by appeal, which can result in the Council losing control over the form of some development, as well as significant financial implications. Production of the documents set out, in line with legislation, national policy and best practice, therefore represents good value for money.

Risk Assessment

- 9.7 There are no direct financial risks associated with the report.

BACKGROUND PAPERS

- Planning and Compulsory Purchase Act 2004 (Section 15)
- Localism Act 2011 (Section 111)
- The Town and Country Planning (Local Planning) (England) Regulations 2012
- National Planning Policy Framework
- Local Development Scheme 2011

APPENDIX 1: EQUALITY IMPACT ASSESSMENT

Provide basic details

Name of proposal/activity/policy to be assessed:

Local Development Scheme

Directorate: ENCAS - Environment, Culture and Sport

Service: Planning and Building Control

Name: Mark Worringham

Job Title: Principal Planner

Date of assessment: 05/06/2013

Scope your proposal

What is the aim of your policy or new service?

To set out the programme for producing planning policy documents.

Who will benefit from this proposal and how?

The Council will benefit from having an agreed programme and way forward for planning policy. Stakeholders, including members of the public and the development industry, will benefit from more certainty about what documents and consultations to expect and when.

What outcomes will the change achieve and for whom?

The outcome will be a clear programme for document production.

Who are the main stakeholders and what do they want?

Developers/landowners, the public and community groups, infrastructure providers. All parties want an easily digestible summary of which planning policy documents will be produced and when so that they are better able and resourced to engage when consultation processes come about. It will also inform how and when developers or landowners intend to bring forward potential development sites.

Assess whether an EIA is Relevant

How does your proposal relate to eliminating discrimination; promoting equality of opportunity; promoting good community relations?

Do you have evidence or reason to believe that some (racial, disability, gender, sexuality, age and religious belief) groups may be affected differently than others? (Think about your monitoring information, research, national data/reports etc)

Yes No

Is there already public concern about potentially discriminatory practices/impact or could there be? Think about your complaints, consultation, feedback.

Yes No

If the answer is Yes to any of the above you need to do an Equality Impact Assessment.

If No you MUST complete this statement

An Equality Impact Assessment is not relevant because the Local Development Scheme in itself is merely a programme for producing documents. Documents within the LDS may have different effects on different groups, but since these have not yet been produced it is impossible to determine what those effects would be. Where this is the case, an Equality Impact Assessment will be carried out on individual documents as they are produced.

| | | |
|-----------------------------|-----------------|---------------------------------|
| Signed (completing officer) | Mark Worringham | Date: 5 th June 2013 |
| Signed (Lead Officer) | Mark Worringham | Date: 5 th June 2013 |

Reading Borough

LOCAL DEVELOPMENT SCHEME

July 2013



www.reading.gov.uk



Reading
Borough Council

Working better with you

1. INTRODUCTION

1.1 A Local Development Scheme is a document that sets out a local planning authority's programme for producing planning policy documents. Local planning authorities are required to produce a Local Development Scheme under Section 15 of the Planning and Compulsory Purchase Act 2004, as amended by part 111 of the Localism Act 2011. This is a document setting out which planning policy documents the authority will be producing and when. The LDS should state:

- (a) the local development documents that will be produced;
- (b) the subject matter and geographical area to which each document is to relate;
- (c) which documents are to have 'development plan' status;
- (d) which documents (if any) are to be prepared jointly with one or more other local planning authorities;
- (e) any matter or area where there is, or is likely to be, a joint committee;
- (f) the timetable for the preparation and revision of the documents

1.2 This LDS therefore sets out the planning policy documents that Reading Borough Council intends to produce over the coming years, what and where they will cover and when they will be produced. Planning policy documents, known as Local Development Documents (LDDs) fall into three categories:

- **Development Plan Documents (DPDs)** that have been subject to independent testing and have the weight of development plan status;
- **Supplementary Planning Documents (SPDs)**, which are not subject to independent testing and do not have development plan status; and
- **Statement of Community Involvement (SCI)**; this sets out how the Council intends to achieve effective community involvement in the preparation of local development documents for the Borough.

1.3 The Council has produced a number of previous Local Development Schemes, in 2005, 2007 and, most recently, 2011. These set out the programmes for preparing the Local Development Framework, much of which has now been adopted. However, a number of recent changes mean that the 2013 LDS is, to some extent, a fresh start:

- Most of the documents detailed in the 2005-2011 LDSs have now been prepared and adopted (see section 2);
- The National Planning Policy Framework (NPPF) has been produced, which combines national planning guidance into one document, and contains a number of important policy shifts;
- There is now an assumption that, in most cases, local planning authorities will produce a single Local Plan as opposed to a

number of separate documents within the Local Development Framework;

- Formal joint arrangements for minerals and waste planning in Berkshire have now ended, and it is for individual authorities to produce their own documents.

1.4 Section 2 summarises the documents that have been adopted and which contain the current planning policy framework for Reading. This includes documents that cover a wider area than just Reading Borough. More detail on these documents is included in Appendix 1.

1.5 Section 3 summarises the programme for production of new planning policy documents. The main document will be a Local Plan. In line with the Government's preference, this will be a single document rather than the set of different documents that currently exist (Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document). This will be supported by further progress on the Community Infrastructure Levy. There will also be continued production of Supplementary Planning Documents, as well as revised versions of some of the procedural documents such as the Statement of Community Involvement. More detail on these documents is included in Appendix 2 (for the Local Plan) and Appendix 3 (for other documents).

2. EXISTING PLANNING POLICY DOCUMENTS

2.1 A number of planning policy documents were already adopted and in operation at the time of this LDS. Not all of these documents relate only to Reading Borough or were prepared by Reading Borough Council. In some cases, some of these documents are only partially still in operation, and Table 1 below and the schedules in Appendix 1 note where this is the case.

2.2 Table 1 below summarises the documents that are already in place and are used in decisions on planning applications. More information on each document, including scope, geographic coverage and process is set out in Appendix 1.

Table 1: Current Planning Policy Documents

| Document Title | Adoption Date | End Year | Policy Lineage |
|--|---------------|---------------|---------------------|
| <i>'Development Plan' Status</i> | | | |
| South East Plan (one retained policy ¹) | May 2009 | 2026 | N/A |
| Core Strategy | Jan 2008 | 2026 | N/A |
| Reading Central Area Action Plan | Jan 2009 | 2026 | N/A |
| Sites and Detailed Policies Document | Oct 2012 | 2026 | N/A |
| Proposals Map | Oct 2012 | 2026 | N/A |
| Replacement Minerals Local Plan (Saved Policies ²) | May 2001 | Not specified | N/A |
| Waste Local Plan (Saved Policies ³) | Dec 1998 | 2006 | N/A |
| <i>Supplementary Planning Document Status</i> | | | |
| Battle Hospital Planning Brief | Apr 2005 | Not specified | SDPD |
| Caversham Lock Area Development Principles | Mar 2006 | Not specified | RCAAP |
| Chatham Street Development Brief | Dec 2002 | Not specified | RCAAP |
| Dee Park Planning Brief | Dec 2008 | Not specified | Core Strategy, SDPD |
| Design Guide to House Extensions | May 2003 | Not specified | SDPD |
| Elvian School Planning and Development Brief | Feb 2011 | Not specified | Core Strategy, SDPD |
| Employment, Skills and Training | Apr 2013 | Not specified | Core Strategy |
| House Conversions and Houses in Multiple Occupation | Sep 2003 | Not specified | Core Strategy, SDPD |
| Kenavon Drive Urban Design Concept Statement | Jul 2004 | Not specified | RCAAP |
| Parking Standards and Design | Oct 2011 | Not specified | Core Strategy |
| Planning Obligations under Section 106 | Sep 2004 | Not specified | Core Strategy |
| Reading Station Area Framework | Dec 2010 | Not specified | RCAAP |
| South West Reading Planning Brief | Apr 2000 | Not specified | |
| Station Hill South Planning and Urban Design Brief | Mar 2007 | Not specified | RCAAP |
| Sustainable Design and Construction | Jul 2011 | Not specified | Core Strategy |
| <i>Other Documents</i> | | | |
| Statement of Community Involvement | July 2006 | Not specified | N/A |

¹ Policy NRM6: Thames Basin Heaths Special Protection Area

² The saved policies in the Replacement Minerals Local Plan are: 1, 2, 2A, 6, 7, 8, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 26, 28, 29

³ The saved policies in the Waste Local Plan are: WLP1, 3, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26, 27, 28, 29, 30, 31, 33, and 34

3. PROGRAMME FOR PRODUCING PLANNING POLICY DOCUMENTS

3.1 This section sets out the programme for which planning policy documents the Council expects to produce, and the timescales and processes for production. Table 2 below summarises the documents to be produced and when they are anticipated to be finalised. More details on each document, including those aspects specified in the Planning and Compulsory Purchase Act 2004 (as amended) are set out in Appendices 2 (for the Local Plan) and 3 (for other documents).

Table 2: Summary Programme for Producing Planning Policy Documents

| Document Title | Planned Consultation(s) | Expected Adoption Date | Policy Lineage |
|---|--|------------------------|--|
| <i>'Development Plan' Status</i> | | | |
| Local Plan | July/Aug 2014 July/Aug 2015 Nov/Dec 2015 | Nov 2016 | National policy |
| <i>Supplementary Planning Document Status</i> | | | |
| Affordable Housing SPD | N/A (complete) | July 2013 | Core Strategy, SDPD |
| Central Area Public Realm Strategy | Oct 2013 | Jan 2014 | RCAAP |
| Guidance on Implementation of Design & Development Policies | Nov 2014 | Mar 2015 | Core Strategy, SDPD |
| Kenavon Drive Planning Brief | Nov 2013 | Mar 2014 | RCAAP |
| Meadway Centre Planning Brief | N/A (complete) | Nov 2013 | Core Strategy, SDPD |
| Residential Conversions SPD | N/A (complete) | Nov 2013 | Core Strategy, SDPD |
| Planning Obligations under Section 106 of the T&CPA SPD | July-Sep 2013 | Nov 2013 | Core Strategy, SDPD |
| Site Specific Section 106 SPD | Nov 2013 | Mar 2014 | Core Strategy, SDPD |
| Sites in West Side of Central Reading Development Brief(s) | Nov 2014 | Mar 2015 | RCAAP |
| Other Site Development Briefs | As required | As required | Core Strategy, SDPD, RCAAP, Local Plan |
| <i>Other Document</i> | | | |
| Statement of Community Involvement | Nov 2013 | Mar 2014 | - |
| Sustainability Appraisal Scoping Report | Nov 2013 | Feb 2013 | - |
| Community Infrastructure Levy Charging Schedule | Nov/Dec 2013 | Autumn 2014 | Core Strategy, SDPD, RCAAP |

3.2 The key document is the Local Plan. This is the sole document with development plan status that the Council is intending to produce, and it would replace all existing Development Plan Documents (the Core Strategy, Reading Central Area Action Plan, Sites and Detailed Policies Document and Proposals Map), as well as saved policies from the Minerals and Waste Local Plans. It will build on, and where appropriate incorporate, the policy areas set out in those DPDs, and respond to emerging issues, particularly those highlighted in the

NPPF. As set out in the NPPF, a combined Local Plan is now the preferred format for development plans, and this is the reason for the Council's approach. Full details on the Local Plan are set out in Appendix 2.

- 3.3 The Local Plan may well incorporate minerals and/or waste policies, which were previously intended to be part of a separate Minerals and Waste Development Framework. This was to be produced jointly with the other five unitary authorities in Berkshire, but the six Berkshire UAs abandoned the formal joint planning arrangements in 2011. However, there may well still be some form of joint working on minerals and/or waste (as well as other strategic planning matters with cross-boundary implications), on evidence gathering or potentially joint plan making with some neighbouring authorities. This will affect whether these matters can be included within the Local Plan. Future versions of the LDS will provide more up-to-date information.
- 3.4 In addition, prior to the first consultation stage of the Local Plan, the Council will produce updated versions of two key procedural documents, the Statement of Community Involvement and the Sustainability Appraisal Scoping Report. These need to be in place to inform how the Local Plan is consulted upon and assessed.
- 3.5 The Council will also continue to produce Supplementary Planning Documents, in order to help applicants make successful applications and aid infrastructure delivery by expanding on policies in development plan documents. These will include Briefs for important development sites, as well as documents expanding on topic-based policies, particularly those related to infrastructure delivery, alongside continuing to progress the Community Infrastructure Levy Charging Schedule.
- 3.6 Figure 3 summarises the interrelationship between existing and new planning policy documents.
- 3.7 Progress on production of planning policy documents is monitored in the Annual Monitoring Report, generally produced in December each year. These can be found on the Council's website⁴.

⁴ <http://www.reading.gov.uk/businesses/planning/planning-policy/research--monitoring-and-technical-reports/www-reading-gov-uk-amr/>

PLANNING POLICY DOCUMENTS AT 1 JULY 2013

PLANNING POLICY DOCUMENTS AT 2016

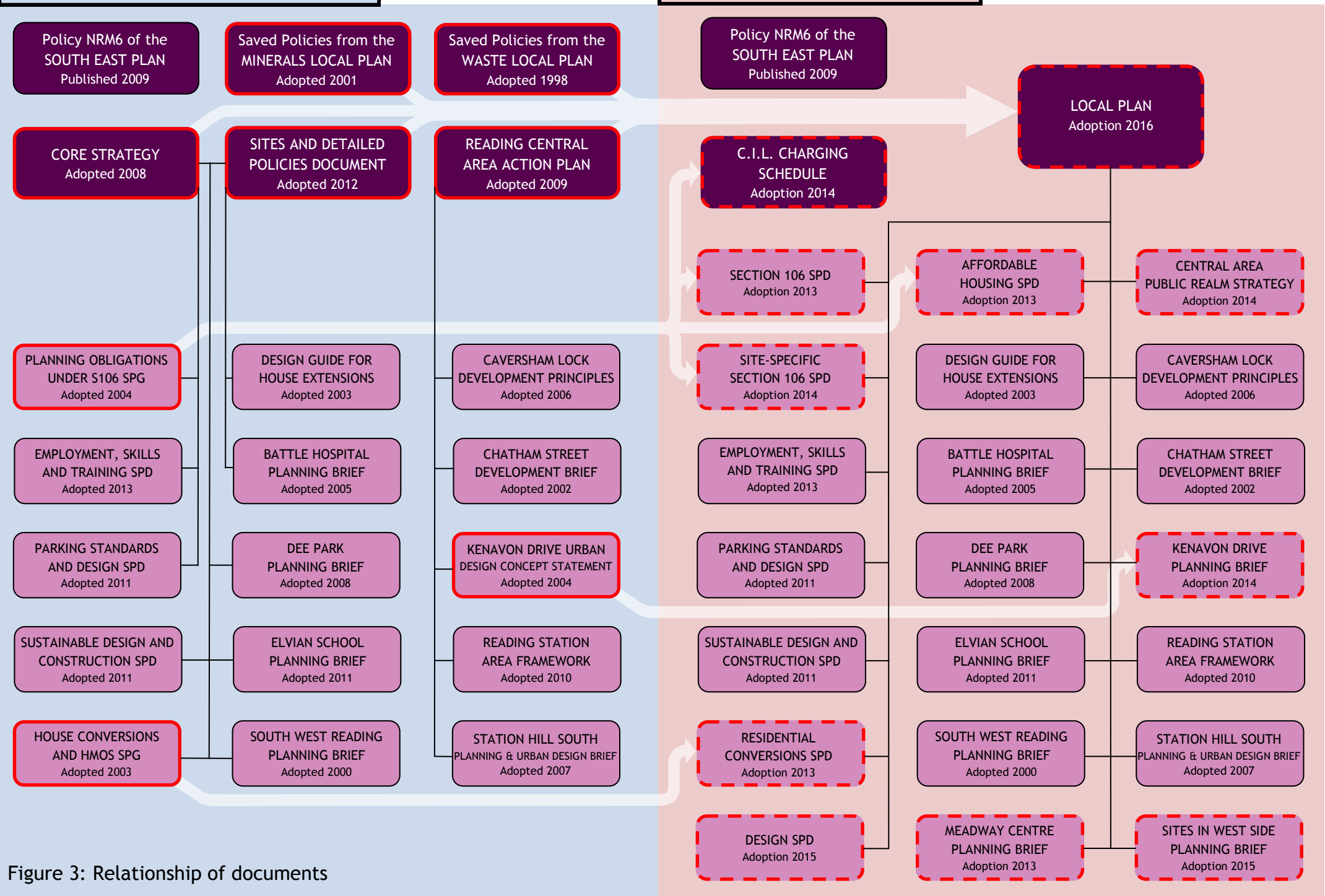
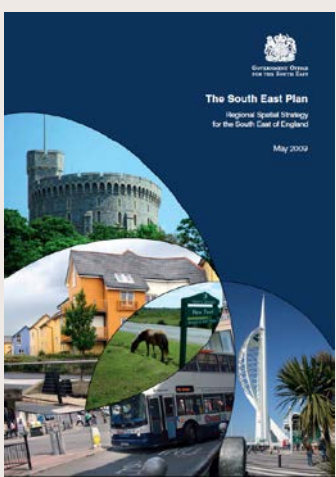
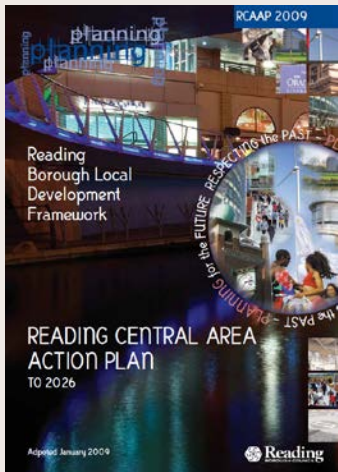


Figure 3: Relationship of documents

APPENDIX 1: EXISTING PLANNING POLICY DOCUMENTS

| | | |
|--|---|---|
| Title | SOUTH EAST PLAN |  |
| Role and Subject | Regional and strategic planning policies | |
| Geographic coverage | South East England | |
| Status | Development Plan | |
| Policy lineage | N/A | |
| Parts of document that are current | NRM6: Thames Basin Heaths Special Protection Area [Remainder of document was revoked on 25 th March 2013] | |
| Draft | March 2006 | |
| Examination | November 2006 - March 2007 | |
| Receipt of Panel Report | August 2007 | |
| Proposed Changes | July 2008 | |
| Final Publication | May 2009 | |
| Revoked | 25 th March 2013 (with exception of policy NRM6) | |
| See part of the final document that includes the retained policy: http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.gos.gov.uk/497648/docs/171301/815607/815696/Pages_from_RSS-3_Section_B.pdf | | |

| | | |
|--|---|--|
| Title | CORE STRATEGY | |
| Role and Subject | Vision, spatial strategy, sustainability framework, core strategic policies, development control policies, housing needs, directions of development. | |
| Geographic coverage | Whole of Reading Borough | |
| Status | Development Plan Document | |
| Policy lineage | N/A | |
| Parts of document that are current | Whole document | |
| Issues and Options | June 2005 http://www.reading.gov.uk/businesses/Planning/planning-policy/core-strategy/csissuesandoptions/ | |
| Preferred Options | March 2006 http://www.reading.gov.uk/businesses/Planning/planning-policy/core-strategy/cspreferredoptions/ | |
| Submission | January 2007 http://www.reading.gov.uk/businesses/Planning/planning-policy/core-strategy/cssubmission/ | |
| Examination | September - October 2007 http://www.reading.gov.uk/businesses/Planning/planning-policy/core-strategy/examination-into-the-core-strategy/ | |
| Receipt of Inspectors Report | December 2007 http://www.reading.gov.uk/businesses/Planning/planning-policy/core-strategy/examination-into-the-core-strategy/ | |
| Adoption | January 2008 http://www.reading.gov.uk/businesses/Planning/planning-policy/core-strategy/adoptedcs/ | |
| See final document: http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/19840/Core-Strategy-Adopted-Jan08.pdf | | |

| | | |
|--|---|---|
| Title | READING CENTRAL AREA ACTION PLAN |  |
| Role and Subject | Central Area Development Strategy and Development Framework. Site Development Principles. Detailed Map of opportunities sites to be the subject of development briefs. | |
| Geographic coverage | Central Area (as defined in RCAAP and on Proposals Map) | |
| Status | Development Plan Document | |
| Policy lineage | Core Strategy | |
| Parts of document that are current | Whole document | |
| Issues and Options | March 2006 http://www.reading.gov.uk/businesses/Planning/planning-policy/reading-central-area-action-plan/rcaapissuesandoptions/ | |
| Preferred Options | January 2007 http://www.reading.gov.uk/businesses/Planning/planning-policy/reading-central-area-action-plan/rcaappreferredoptions/ | |
| Submission | January 2008 http://www.reading.gov.uk/businesses/Planning/planning-policy/reading-central-area-action-plan/rcaapsubmission/ | |
| Examination | September 2008 http://www.reading.gov.uk/businesses/Planning/planning-policy/reading-central-area-action-plan/rcaapexamination/ | |
| Receipt of Inspectors Report | November 2008 http://www.reading.gov.uk/businesses/Planning/planning-policy/reading-central-area-action-plan/rcaapexamination/ | |
| Adoption | January 2009 http://www.reading.gov.uk/businesses/Planning/planning-policy/reading-central-area-action-plan/adoptedrcaap/ | |
| See final document: http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/20111/RCAAP-Adopted-0109.pdf (Text) http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/20112/RCAAP-Adopted-0109-MapsandApps.pdf (Maps and Appendices) | | |

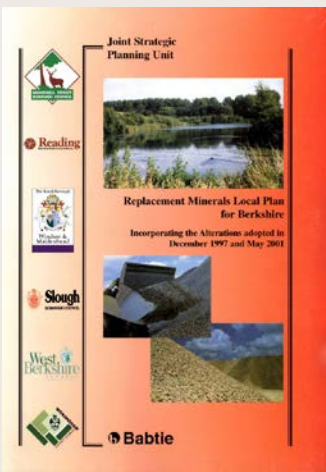
| | | |
|--|---|--|
| Title | SITES AND DETAILED POLICIES DOCUMENT | |
| Role and Subject | Document setting out Development Management Policies along with housing allocations and other site allocation/designations. Document combines Site Allocations and Development Management Documents. | |
| Geographic coverage | Whole Borough (<i>Individual policies may have specific area</i>) | |
| Status | Development Plan Document | |
| Policy lineage | Core Strategy | |
| Parts of document that are current | Whole document | |
| Issues and Options | <p>October 2008⁵ <i>Site Allocations Document</i> http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/saddpd/</p> <p><i>Development Management Document</i> http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/19861/Development-Management-Document-Issues-Options-1008.pdf</p> | |
| New Sites Consultation | <p>October 2009 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/newsites2009/</p> | |
| Pre-Submission | <p>February 2010 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/presubsdpd/</p> | |
| Revised Pre-Submission | <p>February 2011 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/revisedpresubsdpd/</p> | |
| Examination | <p>November - December 2011 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/sdpdexamination/</p> | |
| Main Modifications | <p>February - May 2012 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/sdpdexamination/</p> | |
| Receipt of Inspectors Report | <p>September 2012 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/sdpdexamination/</p> | |
| Adoption | <p>October 2012 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/sdpdadopted/</p> | |
| See final document: http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/23833/SDPD-Adopted-1012.pdf | | |

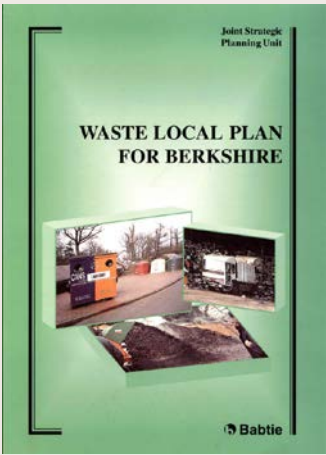
⁵ The SDPD was originally intended to be two separate documents, the Site Allocations Document and Development Management Document, but the two were combined to create a single document in 2010

| | | |
|---|---|--|
| Title | PROPOSALS MAP | |
| Role and Subject | Updated local development constraints, designations, site allocations, Action Area Plans . | |
| Geographic coverage | Whole Borough | |
| Status | Development Plan Document | |
| Policy lineage | Core Strategy, Reading Central Area Action Plan, Sites and Detailed Policies Document | |
| Parts of document that are current | Whole document | |
| Issues and Options | <p>October 2008⁶ <i>Site Allocations Document</i> http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/saddpd/ <i>Development Management Document</i> http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/19861/Development-Management-Documents-Issues-Options-1008.pdf</p> | |
| New Sites Consultation | <p>October 2009 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/newsites2009/</p> | |
| Pre-Submission | <p>February 2010 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/presubsdpd/</p> | |
| Revised Pre-Submission | <p>February 2011 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/revisedpresubsdpd/</p> | |
| Examination | <p>November - December 2011 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/sdpdexamination/</p> | |
| Main Modifications | <p>February - May 2012 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/sdpdexamination/</p> | |
| Receipt of Inspectors Report | <p>September 2012 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/sdpdexamination/</p> | |
| Adoption | <p>October 2012 http://www.reading.gov.uk/businesses/Planning/planning-policy/sites-and-detailed-policies-document/sdpdadopted/</p> | |
| See final Map: http://reading.addresscafe.com/app/exploreit/default.aspx | | |

NB: The Proposals Map was developed alongside the Sites and Detailed Policies Document, so the process above is the same as for that document.

⁶ The SDPD was originally intended to be two separate documents, the Site Allocations Document and Development Management Document, but the two were combined to create a single document in 2010

| | | |
|--|--|---|
| Title | REPLACEMENT MINERALS LOCAL PLAN |  |
| Role and Subject | Policies and sites for development for minerals | |
| Geographic coverage | Berkshire (Now 6 Unitary Authorities - Bracknell Forest Borough Council, Reading Borough Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, West Berkshire Council, Wokingham Borough Council) | |
| Status | Development Plan Document | |
| Policy lineage | N/A | |
| Parts of document that are current | Following policies were 'saved' in September 2007 and remain in place: 1, 2, 2A, 6, 7, 8, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 26, 28, 29 | |
| Draft Plan | 1993 | |
| Public Inquiry | 1993 | |
| Report of Inspector | May 1994 | |
| Adopted | November 1994 | |
| Alterations Adopted | December 1997 | |
| Further Alterations Adopted | May 2001 | |
| See final document: http://www.reading.gov.uk/businesses/Planning/planning-policy/minerals-and-waste-planning-policy/mineralslocalplan/ | | |

| | | |
|--|--|---|
| Title | WASTE LOCAL PLAN |  |
| Role and Subject | Policies and sites for development for waste | |
| Geographic coverage | Berkshire (Now 6 Unitary Authorities - Bracknell Forest Borough Council, Reading Borough Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, West Berkshire Council, Wokingham Borough Council) | |
| Status | Development Plan Document | |
| Policy lineage | N/A | |
| Parts of document that are current | Following policies were 'saved' in September 2007 and remain in place: WLP1, 3, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26, 27, 28, 29, 30, 31, 33, and 34 | |
| Public consultation | 1993 & 1994 | |
| Draft Plan | December 1994 | |
| Public Inquiry | 1995-1996 | |
| Report of Inspector | Early 1998 | |
| Adopted | December 1998 | |
| See final document: http://www.reading.gov.uk/businesses/Planning/planning-policy/minerals-and-waste-planning-policy/wastelocalplan/ | | |

| | | |
|--|---|--|
| Title | STATEMENT OF COMMUNITY INVOLVEMENT | |
| Role and Subject | Statement setting out community involvement strategy, events, exercises and consultation undertaken and to be undertaken in preparing the RBC LDD. | |
| Geographic coverage | Whole of Reading Borough | |
| Status | Statement of Community Involvement | |
| Policy lineage | N/A | |
| Parts of document that are current | Whole document | |
| Draft | March 2005 http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/19892/Draft-RBC-SCI-Oct04-Mar05.pdf | |
| Pre-Submission | June 2005 http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/20083/Pre-Submission-SCI-Jun05.pdf | |
| Submission | October 2005 http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/20409/Submission-SCI-Oct05.pdf | |
| Examination | 2005-2006 | |
| Receipt of Inspectors Report | May 2006 http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/20282/SCI-Inspectors-Report-May06.pdf | |
| Adoption | July 2006 http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/20280/SCI-Adopted-July-06.pdf | |
| See final document: http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/20280/SCI-Adopted-July-06.pdf | | |

| | | |
|---|--|--|
| Title | BATTLE HOSPITAL REVISED PLANNING BRIEF | |
| Role and Subject | Development of Battle Hospital | |
| Geographic coverage | Battle Hospital site | |
| Status | Supplementary Planning Document | |
| Policy lineage | Sites and Detailed Policies Document | |
| Parts of document that are current | Whole document | |
| Draft | November 2004 | |
| Adoption | 18 th April 2005 | |
| See final document: | | |
| http://www.reading.gov.uk/documents/servingyou/planning/futuredevelopments/19613/BATTLE-BRIEF-Oct05.pdf | | |

| | | |
|---|--|--|
| Title | CAVERSHAM LOCK AREA DEVELOPMENT PRINCIPLES | |
| Role and Subject | Development of Caversham Lock area | |
| Geographic coverage | Caversham Lock | |
| Status | Supplementary Planning Document | |
| Policy lineage | Reading Central Area Action Plan | |
| Parts of document that are current | Whole document | |
| Draft | October 2005 | |
| Adoption | 20 th March 2006 | |
| See final document: | | |
| http://www.reading.gov.uk/documents/servingyou/planning/futuredevelopments/19621/Caversham-Lock-Devt-Principles-Apr06.pdf | | |

| | | |
|---|------------------------------------|--|
| Title | CHATHAM STREET DEVELOPMENT BRIEF | |
| Role and Subject | Development of Chatham Street area | |
| Geographic coverage | Chatham Street | |
| Status | Supplementary Planning Document | |
| Policy lineage | Reading Central Area Action Plan | |
| Parts of document that are current | Whole document | |
| Draft | October 2002 | |
| Adoption | December 2002 | |
| See final document: | | |
| http://www.reading.gov.uk/documents/servingyou/planning/supplementary-guidance/20464/Chatham-Street-Development-Brief.pdf | | |

| | | |
|--|---|--|
| Title | DEE PARK PLANNING BRIEF | |
| Role and Subject | Development of Dee Park area | |
| Geographic coverage | Dee Park | |
| Status | Supplementary Planning Document | |
| Policy lineage | Core Strategy, Sites and Detailed Policies Document | |
| Parts of document that are current | Whole document | |
| Draft | July 2008 | |
| Adoption | December 2008 | |
| See final document: http://www.reading.gov.uk/documents/servingyou/planning/supplementary-guidance/20471/Dee-Park-Planning-Brief-1208-p1to17.pdf (P1-16) http://www.reading.gov.uk/documents/servingyou/planning/supplementary-guidance/20472/Dee-Park-Planning-Brief-1208-pp18to35.pdf (P17-33) | | |

| | | |
|--|---|--|
| Title | DESIGN GUIDE TO HOUSE EXTENSIONS | |
| Role and Subject | Detailed design guidelines for house extensions | |
| Geographic coverage | Whole Borough | |
| Status | Supplementary Planning Document | |
| Policy lineage | Sites and Detailed Policies Document | |
| Parts of document that are current | Whole document | |
| Draft | November 2002 | |
| Adoption | May 2003 | |
| See final document: http://www.reading.gov.uk/documents/servingyou/planning/supplementary-guidance/20474/DesignGuidetoHouseExtns.pdf | | |

| | | |
|--|---|--|
| Title | ELVIAN SCHOOL PLANNING AND DEVELOPMENT BRIEF | |
| Role and Subject | Development of the Elvian School site | |
| Geographic coverage | Elvian School site, Bath Road | |
| Status | Supplementary Planning Document | |
| Policy lineage | Core Strategy, Sites and Detailed Policies Document | |
| Parts of document that are current | Whole document | |
| Draft | October 2010 | |
| Adoption | 14 th February 2011 | |
| See final document: http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/19933/Elvian-School-Brief-Adopted-0211.pdf | | |

| | | |
|---|---|--|
| Title | EMPLOYMENT, SKILLS AND TRAINING S.P.D. | |
| Role and Subject | Detailed guidance for securing planning obligation contributions from developers towards local labour market initiatives. | |
| Geographic coverage | Whole Borough | |
| Status | Supplementary Planning Document | |
| Policy lineage | Core Strategy, Sites and Detailed Policies Document | |
| Parts of document that are current | Whole document | |
| Draft | November 2012 | |
| Adoption | 15 th April 2013 | |
| See final document: | | |
| http://www.reading.gov.uk/documents/servingyou/planning/supplementary-guidance/25153/employment-skills-and-training-spd-adopted-0413.pdf | | |

| | | |
|---|---|--|
| Title | HOUSE CONVERSIONS AND HOUSES IN MULTIPLE OCCUPATION | |
| Role and Subject | Guidance for proposals to convert houses to flats or houses in multiple occupation. | |
| Geographic coverage | Whole Borough | |
| Status | Supplementary Planning Document | |
| Policy lineage | Core Strategy, Sites and Detailed Policies Document | |
| Parts of document that are current | Whole document | |
| Draft | April 2003 | |
| Adoption | 22 nd September 2003 | |
| See final document: | | |
| http://www.reading.gov.uk/documents/servingyou/planning/19398/house-conversion-and-house-in-multi-occ.pdf | | |

| | | |
|---|--|--|
| Title | KENAVON DRIVE URBAN DESIGN CONCEPT STATEMENT | |
| Role and Subject | Guidance for the urban design aspects of the development of the Kenavon Drive area | |
| Geographic coverage | Kenavon Drive area | |
| Status | Supplementary Planning Document | |
| Policy lineage | Core Strategy, Reading Central Area Action Plan | |
| Parts of document that are current | Whole document | |
| Draft | April 2004 | |
| Adoption | July 2004 | |
| See final document: | | |
| http://www.reading.gov.uk/documents/servingyou/planning/19405/Kenavon-Dirve-UrbanDesignConceptStatemt.pdf | | |

| | | |
|--|---|--|
| Title | REVISED PARKING STANDARDS & DESIGN S.P.D. | |
| Role and Subject | Guidance on the levels of parking that should be provided as part of new developments and on the design of parking. | |
| Geographic coverage | Whole Borough | |
| Status | Supplementary Planning Document | |
| Policy lineage | Core Strategy | |
| Parts of document that are current | Whole document | |
| Draft | July 2011 | |
| Adoption | 31 st October 2011 | |
| See final document: http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/21420/Revised-Parking-SPD-Adopted-1011.pdf | | |

| | | |
|--|--|--|
| Title | PLANNING OBLIGATIONS UNDER SECTION 106 OF TOWN AND COUNTRY PLANNING ACT 1990 | |
| Role and Subject | Framework for determining what planning obligations will be sought. | |
| Geographic coverage | Whole Borough | |
| Status | Supplementary Planning Document | |
| Policy lineage | Core Strategy, Sites and Detailed Policies Document | |
| Parts of document that are current | Whole document with the exception of Section 6 (Economic Development) | |
| Draft | January 2004 | |
| Adoption | September 2004 (amended version) | |
| See final document: http://www.reading.gov.uk/documents/servingyou/planning/supplementary-guidance/20514/SPG-Planning-Obligations-UnderS106.pdf | | |

| | | |
|--|---|--|
| Title | READING STATION AREA FRAMEWORK | |
| Role and Subject | Guidance for the development of the area around Reading Station | |
| Geographic coverage | Station/River Major Opportunity Area | |
| Status | Supplementary Planning Document | |
| Policy lineage | Reading Central Area Action Plan | |
| Parts of document that are current | Whole document | |
| Draft | February 2010 | |
| Adoption | 1 st December 2010 | |
| See final document: http://www.reading.gov.uk/businesses/planning/planning-policy/supplementary-planning-guidance-and-documents/sites/reading-station-area-framework/ | | |

| | | |
|--|--|--|
| Title | SOUTH WEST READING PLANNING BRIEF | |
| Role and Subject | Guidance for the development of South West Reading | |
| Geographic coverage | South West Reading | |
| Status | Supplementary Planning Document | |
| Policy lineage | Sites and Detailed Policies Document | |
| Parts of document that are current | Whole document | |
| Draft | 1999 | |
| Adoption | April 2000 | |
| See final document: http://www.reading.gov.uk/documents/servingyou/planning/supplementary-guidance/20492/Revised-Planning-Brief-for-South-West-Reading.pdf | | |

| | | |
|--|---|--|
| Title | STATION HILL SOUTH PLANNING AND URBAN DESIGN BRIEF | |
| Role and Subject | Guidance for the development of the Station Hill South site | |
| Geographic coverage | Station Hill South | |
| Status | Supplementary Planning Document | |
| Policy lineage | Reading Central Area Action Plan | |
| Parts of document that are current | Whole document | |
| Draft | May 2006 | |
| Adoption | March 2007 | |
| See final document: http://www.reading.gov.uk/businesses/Planning/planning-policy/supplementary-planning-guidance-and-documents/sites/stationhillsouth/ | | |

| | | |
|--|--|--|
| Title | SUSTAINABLE DESIGN AND CONSTRUCTION S.P.D. | |
| Role and Subject | Guidance for the application of the Council's policies on sustainable design and construction. | |
| Geographic coverage | Whole Borough | |
| Status | Supplementary Planning Document | |
| Policy lineage | Core Strategy | |
| Parts of document that are current | Whole document | |
| Draft | February 2011 | |
| Adoption | 11 th July 2011 | |
| See final document: http://www.reading.gov.uk/documents/servingyou/planning/local_development_framework/20433/Sustainable-Design-and-Construction-SPD-Adopted-0711.pdf | | |

APPENDIX 2: LOCAL PLAN PRODUCTION


Summary


| | |
|---|--|
| Title | LOCAL PLAN |
| Role and Subject | <p>Vision and key objectives; spatial strategy; overall development needs including for housing, employment, retail and leisure, community uses and infrastructure; development management policies, including design, sustainable design, local requirements for infrastructure and affordable housing, amenity etc; site allocations to meet development needs; designation of land for protection or other policy designations; implementation and monitoring framework.</p> <p>Potential to include minerals and waste policies and allocations (see paragraph 3.3).</p> <p>On initial consideration, the following are likely to be among the main areas where revision to policy will need to be considered. Most of these are due to changes in national policy in the NPPF, national priorities such as progress towards zero carbon, or the national planning system (CIL, permitted development rights).</p> <ul style="list-style-type: none"> • Level of development need that should be accommodated (housing, employment, retail, infrastructure, other uses); • Location of development, including site allocations; • Consider inclusion of minerals and waste policies; • A strategy for the historic environment; • Updated sustainable design policies; • Updated infrastructure provision policies to reflect changes to CIL and Section 106; • Any changes to policies needed to reflect new permitted development rights (e.g. residential amenity and employment) <p>It is expected that many other policy areas will not need major change, and can largely be transferred to a new Local Plan, subject to consultation and Sustainability Appraisal.</p> |
| Geographic coverage | Whole of Reading Borough |
| Status | Development Plan |
| Joint preparation | There is potential for some joint preparation of parts of the plan with neighbouring authorities, in particular relating to minerals and waste and other strategic cross-boundary matters. This will be a matter for further discussion with adjacent authorities, and more information will be reported in future versions of the LDS if and when it becomes available. |
| Policy lineage | National policy |
| Documents that would be replaced | Core Strategy, Reading Central Area Action Plan, Sites and Detailed Policies Document, Proposals Map. Also potentially Replacement Minerals Local Plan (saved policies), Waste Local Plan (saved policies) |
| First call for site nominations | January 2014 |
| Consultation on issues and potential sites | July/August 2014 |
| Draft Local Plan for consultation | July/August 2015 |
| Revised Draft Local Plan consultation | November/December 2015 |
| Submission | February 2016 |
| Examination | May, June, July 2016 |
| Adoption | November 2016 |

Detailed Timetable

A2.1 The table below shows the main blocks of work in drawing up a Local Plan, and approximately when they are expected to be undertaken. The fact that a certain element of work is not shown does not mean that it will not be undertaken, merely that it does not form one of the most significant elements of work for project planning. Likewise, the timescales shown are approximate only and are an indication at this stage - the main milestones that progress should be judged against are those shown in the Local Plan table in Appendix 2 (and highlighted as key stages in pink below).

| | | | | |
|------|---|---|---|--|
| 2013 | Jul | Evidence - Population and Demography | Evidence - Local Aggregate Assessment | Set up mechanisms for Duty to Cooperate, and initial discussions |
| | Aug | | | |
| | Sep | Evidence - Strategic Housing Market Assessment (housing needs) | Evidence - flood risk | |
| | Oct | | | |
| | Nov | | | |
| | Dec | | | |
| 2014 | Jan | First call for site nominations | | |
| | Feb | Evidence - Strategic Housing Land Availability Assessment | Evidence - infrastructure needs | Evidence - waste planning needs |
| | Mar | | Evidence - Employment and retail needs | |
| | Apr | | | |
| | May | | | |
| | Jun | | | |
| | Jul | Consultation on issues and potential sites | | |
| | Aug | | | |
| | Sep | | | |
| | Oct | Develop overall strategy of development scale and location | | |
| | Nov | | | |
| | Dec | | | |
| 2015 | Jan | Develop development management policies | Develop site allocation and area designations | Update evidence base |
| | Feb | | | |
| | Mar | | | |
| | Apr | Test development management policies for viability | Create Draft Proposals Map | Develop monitoring and implementation framework |
| | May | | | |
| | Jun | | | |
| | Jul | Consultation on Draft Local Plan | | |
| | Aug | | | |
| | Sep | Amendments to Plan, including further liaison with interested parties on wording. | | |
| | Oct | Update evidence where necessary. | | |
| Nov | Consultation on Revised Draft Local Plan | | | |
| Dec | Minor amendments and coordination of evidence | | | |
| 2016 | Jan | Submission of Local Plan | | |
| | Feb | | | |
| | Mar | | | |
| | Apr | | | |
| | May | | | |
| | Jun | Examination of Local Plan | | |
| | Jul | | | |
| | Aug | | | |
| | Sep | Report of Inspector | | |
| | Oct | | | |
| | Nov | Adoption | | |
| | Dec | | | |

 Key milestone (shown in summary)

 External advice (e.g. consultant) may be required

Resources

- A2.2 Much of the work to be undertaken on the Local Plan will be carried out using existing resources, in particular preparing policies and documents, carrying out sustainability appraisal and liaising with key consultees and stakeholders.
- A2.3 However, as can be seen from the table above, there are some particular points which are particularly resource-intensive or where additional resources will be required. These are summarised by financial year below:
- **2013-2014**
 - Evidence base - demographics, housing need, Local Aggregate Assessment and flood risk
 - Engage with local community and development industry to nominate potential sites for development
 - **2014-2015**
 - Evidence base - employment and retail need, waste evidence
 - Wide-ranging consultation on issues and potential sites
 - **2015-2016**
 - Viability testing of draft local requirements (e.g. S106/CIL, affordable housing, sustainability policies)
 - Consultation on Draft and Revised Draft Local Plans
 - **2016-2017**
 - Examination of Local Plan
- A2.4 In the case of consultation exercises, these are usually managed in-house using existing staff, although there may be financial implications where they are wide-ranging. Elements of evidence gathering that are highlighted are likely to involve external expertise, most likely the use of planning consultants, with associated costs, although in some cases the costs can be reduced by combining in-house expertise with work by consultants and commissioning studies jointly with adjoining local authorities. In terms of the Examination, this can be a significant financial cost, as the Planning Inspectorate charges the Council for their time, and there are additional resource implications in terms of administration support and room hire etc.
- A2.5 The Local Plan is the most significant of the documents to be produced within this Local Development Scheme. It is currently considered that there are likely to be sufficient resources to produce this document alongside the other documents listed in Appendix 3, albeit that additional resource pressures will arise in commissioning necessary studies and holding an examination which exceed budget allowances (see above). However, in the event that resources are too limited to allow this, the Local Plan will generally take priority, unless there are strong reasons for this not to be the case. The possible exception is for introduction of the Community Infrastructure

Levy, which is an important priority to ensure that development mitigates its impacts and contributes towards the provision of vital infrastructure.

Risks

A2.6 There are a number of potential risks in producing a document such as the Local Plan. These are considered below:

- **Changing national policy:** If new policy is introduced at the national level, this can cause significant issues in terms of delaying and derailing local policy. This was the case in Reading when the introduction of the National Planning Policy Framework caused an approximately six month delay in adopting the Sites and Detailed Policies Document.

The main area where national policy is likely to change in the near future is in terms of waste planning. The NPPF does not deal with waste, and new national guidance is due to be put in place. Prior to such policy being in place, it would make no sense for the Local Plan to attempt to include local waste policies, so the Local Plan should proceed without waste being included, and it can be dealt with in a later document. However, it is anticipated that national waste policy should be in place before the end of 2013 and can be taken on board in producing local waste policies.

- **Changing national planning system:** The planning system has been extensively tinkered with in recent years. Some changes, for instance new permitted development rights introduced in May 2013, have implications for policies on residential amenity and employment land. Other changes have included changing regulations on CIL, which affects when the Council can progress its Draft Charging Schedule and associated policies on Section 106 agreements. There is little that the Council can do to guard against this other than to monitor the situation and take early action to alter the programme or the document itself if needs be. However, the Planning Minister has recently indicated that the drip-feed of incremental changes to the planning system may be coming to an end.
- **Less resource availability:** Reduced resource availability is a real risk to the programme envisaged. It could mean longer timescales for policy drafting or in-house evidence collation. It could also mean being unable to finance external consultants to produce key documents. In the latter case, the Council will need to consider whether certain pieces of evidence can instead be produced in-house, or whether the timescale of the Plan should be pushed back to allow this to be budgeted for in a later

financial year. In general, although some reasonable flexibility is built into the current programme, much reduced resource availability is likely to mean a delay in the timescale, and this will need to be reflected in future versions of the LDS.

- **Changing local circumstances:** It is not considered likely that there will be substantial changes to local planning circumstances (e.g. demography, development pressures, economic changes) that would cause a major issue for the programme outlined in this LDS. Planning policies should be drafted with enough flexibility to cope with changes in circumstances, and the flexibility of the policies will be one of the tests when the document is examined.
- **Duty to Co-operate:** The duty to co-operate, introduced through the Localism Act 2011, is one of the most significant considerations in plan-making, and has been the reason for delays in plan production in a number of other authorities. It is the first thing that an Inspector will consider in examining a plan. In Berkshire, there is a tradition of joint working, but there are nevertheless some difficult issues to address with other authorities, both in Berkshire and elsewhere, particularly since some of Reading's objectively assessed needs may need to be met in adjoining authorities. Waste planning is one such potential issue, and cooperation will also be required for delivery of housing and infrastructure provision, including education. Setting up procedures and an ongoing process for cooperating with neighbouring authorities to try to resolve these issues is therefore a priority early in the process.

APPENDIX 3: OTHER DOCUMENTS TO BE PRODUCED

| | |
|---|--|
| Title | AFFORDABLE HOUSING S.P.D |
| Role and Subject | Guidance for provision of affordable housing on small and large sites |
| Geographic coverage | Whole Borough |
| Status | Supplementary Planning Document |
| Policy lineage | Core Strategy, Sites and Detailed Policies Document |
| Documents that would be replaced | S.P.G on Planning Obligations under Section 106 of the Town and Country Planning Act 1990 [part] |
| Draft | November 2012 |
| Adoption | July 2013 |

| | |
|---|---|
| Title | CENTRAL AREA PUBLIC REALM STRATEGY |
| Role and Subject | Guidance on the improvement of existing public realm and the creation of new public realm within central Reading. |
| Geographic coverage | Central Area (as defined in the Reading Central Area Action Plan) |
| Status | Supplementary Planning Document |
| Policy lineage | Reading Central Area Action Plan |
| Documents that would be replaced | None |
| Draft | November 2013 |
| Adoption | March 2014 |

| | |
|---|---|
| Title | GUIDANCE ON IMPLEMENTATION OF DESIGN AND DEVELOPMENT POLICIES |
| Role and Subject | Guidance on implementation of design principles, appropriate standards and preparation of Design Statements to accompany planning applications. |
| Geographic coverage | Whole Borough |
| Status | Supplementary Planning Document |
| Policy lineage | Core Strategy, Sites and Detailed Policies Document |
| Documents that would be replaced | None |
| Draft | November 2014 |
| Adoption | March 2015 |

| | |
|---|---|
| Title | KENAVON DRIVE PLANNING BRIEF |
| Role and Subject | Guidance for the development of sites in the Kenavon Drive area |
| Geographic coverage | Kenavon Drive area |
| Status | Supplementary Planning Document |
| Policy lineage | Reading Central Area Action Plan |
| Documents that would be replaced | Kenavon Drive Urban Design Concept Statement |
| Draft | November 2013 |
| Adoption | March 2014 |

| | |
|---|---|
| Title | MEADWAY CENTRE PLANNING BRIEF |
| Role and Subject | Guidance for the development of the Meadway Centre |
| Geographic coverage | Meadway Centre, Honey End Lane |
| Status | Supplementary Planning Document |
| Policy lineage | Core Strategy, Sites and Detailed Policies Document |
| Documents that would be replaced | None |
| Initial consultation | February - April 2012 |
| Draft | November 2012 |
| Adoption | November 2013 |

| | |
|---|---|
| Title | RESIDENTIAL CONVERSIONS S.P.D. |
| Role and Subject | Guidance for proposals to convert houses to flats or houses in multiple occupation. |
| Geographic coverage | Whole Borough |
| Status | Supplementary Planning Document |
| Policy lineage | Core Strategy, Sites and Detailed Policies Document |
| Documents that would be replaced | House Conversions and Houses in Multiple Occupation SPG |
| Draft | May 2013 |
| Adoption | November 2013 |

| | |
|---|--|
| Title | PLANNING OBLIGATIONS UNDER SECTION 106 OF TOWN AND COUNTRY PLANNING ACT 1990 S.P.D. |
| Role and Subject | Update of existing framework for determining how planning obligations will be sought. |
| Geographic coverage | Whole Borough |
| Status | Supplementary Planning Document |
| Policy lineage | Core Strategy, Sites and Detailed Policies Document |
| Documents that would be replaced | S.P.G on Planning Obligations under Section 106 of the Town and Country Planning Act 1990 [part] |
| Draft | July/August 2013 |
| Adoption | November 2013 |

| | |
|---|---|
| Title | SITE-SPECIFIC SECTION 106 AGREEMENTS S.P.D. |
| Role and Subject | Framework for determining how planning obligations will be sought to deal with individual site-specific issues. |
| Geographic coverage | Whole Borough |
| Status | Supplementary Planning Document |
| Policy lineage | Core Strategy, Sites and Detailed Policies Document |
| Documents that would be replaced | Planning Obligations under Section 106 of the Town and Country Planning Act 1990 SPD |
| Draft | November 2013 |
| Adoption | March 2014 |

| | |
|---|---|
| Title | SITES IN WEST SIDE OF CENTRAL READING DEVELOPMENT BRIEF(S) |
| Role and Subject | Examining the development potential of several sites including the Hosier Street area and the Cattle Market |
| Geographic coverage | West Side Major Opportunity Area (policy RC2 of Reading Central Area Action Plan) |
| Status | Supplementary Planning Document |
| Policy lineage | Reading Central Area Action Plan |
| Documents that would be replaced | None |
| Draft | November 2014 |
| Adoption | March 2015 |

| | |
|---|---|
| Title | OTHER SITE DEVELOPMENT BRIEFS |
| Role and Subject | Examining development potential of various sites including sites identified and proposed for allocation for development in the Sites and Detailed Policies Document, and sites identified through the production of the Local Plan. |
| Geographic coverage | Various |
| Status | Supplementary Planning Document |
| Policy lineage | Core Strategy, Reading Central Area Action Plan, Sites and Detailed Policies Document, Local Plan |
| Documents that would be replaced | None |
| Draft | As required |
| Adoption | As required |

| | |
|---|--|
| Title | STATEMENT OF COMMUNITY INVOLVEMENT |
| Role and Subject | Revised version of the Statement setting out community involvement strategy for planning policy documents and for major planning applications. |
| Geographic coverage | Whole Borough |
| Status | Statement of Community Involvement |
| Policy lineage | N/A |
| Documents that would be replaced | Statement of Community Involvement (Adopted 2006) |
| Draft for consultation | November 2013 |
| Adoption | March 2014 |

| | |
|---|---|
| Title | SUSTAINABILITY APPRAISAL SCOPING REPORT |
| Role and Subject | Revised version of the document which provides the framework for carrying out a sustainability appraisal of planning policy documents, including sustainability objectives. |
| Geographic coverage | Whole Borough |
| Status | Background report |
| Policy lineage | N/A |
| Documents that would be replaced | Sustainability Appraisal Scoping Report (Revised October 2008) |
| Draft for consultation | November 2013 |
| Final version | February 2014 |

| | |
|---|---|
| Title | COMMUNITY INFRASTRUCTURE LEVY CHARGING SCHEDULE |
| Role and Subject | Basis for applying the Community Infrastructure Levy to secure funding from development for infrastructure to support growth and development. |
| Geographic coverage | Whole Borough |
| Status | Community Infrastructure Levy Charging Schedule |
| Policy lineage | Core Strategy, Reading Central Area Action Plan, Sites and Detailed Policies Document |
| Documents that would be replaced | None |
| Preliminary Draft | February 2013 |
| Draft | November 2013 |
| Submission | March 2014 |
| Examination | Summer 2014 |
| Adoption | Autumn 2014 |

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ENVIRONMENT, CULTURE AND SPORT

| | | | |
|------------------|---|--------------|--|
| TO: | Strategic, Environment, Planning and Transport Committee | | |
| DATE: | 9 July 2013 | AGENDA ITEM: | 12 |
| TITLE: | THE BUILDING (LOCAL AUTHORITY CHARGES) REGULATIONS 2010 - AMENDING THE SCHEME OF DELEGATION | | |
| LEAD COUNCILLOR: | Tony Page | PORTFOLIO: | Strategic, Environment, Planning and Transport |
| SERVICE: | Building Control | WARDS: | All |
| LEAD OFFICER: | Neil Uzzell | TEL: | 72442 |
| JOB TITLE: | Building Control and Fire Safety Manager | E-MAIL: | neil.uzzell@reading.gov.uk |

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 To inform members of a proposed change to the scheme of delegation in the method of setting charges for the statutory building regulation function. The Building (Local Authority Charges) Regulations 2010 (Hereafter referred to as the 2010 Regulations) allow local authorities to fix their own charges in a scheme, based on full recovery of their costs.
- 1.2 These charges allow for flexibility in setting charges in an environment where the Council is in direct competition with private sector building control providers.
- 1.3 In recognition of the need to regularly review and adjust charges to ensure break-even position, delegated authority is requested to allow the Head of Planning and Building Control with the Head of Finance in consultation with the Lead member to make any necessary adjustments to the charging scheme from time to time.

2. RECOMMENDED ACTION

- 2.1 That the scheme of delegation register be changed so that the Head of Planning and Building Control be authorised, in consultation with the Head of Finance and the Lead Member, to review and adjust the level of charges set under the charging scheme and to publicise any amendments to the scheme, as required by the Regulations.

3. POLICY CONTEXT

- 3.1 The 2010 Regulations requires local authorities to set a scheme of charging for building regulations chargeable work. The regulations require charges to be calculated on a full cost recovery basis to achieve an objective of breaking even 'as nearly as possible', based on the principle of taking 1 year after another.
- 3.2 Local authorities are free to devise whatever scheme of charges they see fit, taking into account a variety of prescribed factors which are listed in the proposed scheme for the recovery of building regulation charges and associated matters.
- 3.3 The aim of 2010 Regulations is to allow flexibility, accuracy, transparency and fairness in the way that building control charge for the building control service, as well as enabling building control to operate more effectively in a competitive environment. In the past some charges have not realistically or accurately represented the work that building control carry out.

4. THE PROPOSAL

4.1 Current Position:

- 4.2 The current delegation register makes reference to the Building (Local Authority Charges) Regulations 1998, which allows the standard scale of charges to be varied by plus and/or minus 10%. This is no longer relevant, as the 2010 Regulations has modified and departed from the 1998 Regulations allowing more flexibility in setting and adjusting the scheme of charges.

4.2 Option Proposed

- 4.3 To amend the delegated authority to allow the Head of Planning and Building Control with the Head of Finance in consultation with the Lead member to make any necessary adjustments to the charging scheme from time to time.

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 The proposals in this report will continue to promote equality, social inclusion and a safe and healthy environment for all.

6. COMMUNITY ENGAGEMENT AND INFORMATION

- 6.1 Any new or amended charges are required by the regulations to be publicised 7 days before they come into effect. They will be publicised on the Council's website and an email sent to our regular uses of our service.

7. EQUALITY IMPACT ASSESSMENT

- 7.1 Under the Equality Act 2010, Section 149, a public authority must consider whether the decision will or could have a differential impact on: racial groups; gender; people with disabilities; people of a particular sexual orientation; people due to their age; people due to their religious belief.
- 7.2 Equality Impact Assessment (EIA) is not relevant to the decision.

8. LEGAL IMPLICATIONS

8.1 There are no legal implications.

9. FINANCIAL IMPLICATIONS

9.1 The proposal in this report will continue to deliver full cost recovery for carrying out this service.

9.3 Income generated will continue to be monitored to ensure that it is on course to achieve the objective of break even. Regular monthly monitoring will be carried out by the Building Control and Fire Safety Manager working with the Finance team. If it is found that the break-even objective is not being met it may be necessary to revise the schedules, accordingly.

9.5 Building Control continues to maintain steady market share of around 75% of all building projects within the Borough, and continues to perform well when compared with neighbouring authorities.

9.6 The market share may fluctuate but will be carefully monitored and the charges will be reviewed on a regular basis.

10. BACKGROUND PAPERS

10.1 Scheme for the recovery of the building regulation charges and associated matters - version 2. (July 2013).

10.2 Guidance notes on the Building Regulations charges 2013 v2. (July 2013).

10.3 Statutory Instrument 2010 No. 404 - The Building (Local Authority Charges) Regulations 2010.

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ENVIRONMENT, CULTURE AND SPORT

| | | | |
|------------------|--|--------------|--|
| TO: | Strategic Environment, Planning & Transport Committee | | |
| DATE: | 9 th July 2013 | AGENDA ITEM: | 13 |
| TITLE: | FLOOD & WATER MANAGEMENT ACT 2010 - LEAD LOCAL FLOOD AUTHORITY DUTIES: DELEGATION OF AUTHORITY TO HEAD OF HIGHWAYS & TRANSPORT | | |
| LEAD COUNCILLOR: | COUNCILLOR | PORTFOLIO: | STRATEGIC ENVIRONMENT, PLANNING & TRANSPORT |
| SERVICE: | TONY PAGE | WARDS: | BOROUGH WIDE |
| | TRANSPORT | | |
| LEAD OFFICER: | SAM SHEAN | TEL: | 0118 937 2138 |
| JOB TITLE: | ASSISTANT HIGHWAYS MANAGER | E-MAIL: | sam.shean@reading.gov.uk |

1. EXECUTIVE SUMMARY

- 1.1 To seek Strategic Environment, Planning & Transport Committee approval to delegate authority to the Head of Highways and Transport to carry out the Lead Local Flood Authority Duties as set out in the Flood & Water Management Act 2010 and Flood Risk Regulations 2009.

2. RECOMMENDED ACTION

- 2.1 That the Strategic Environment, Planning & Transport Committee delegate to the Head of Highways and Transport authority to exercise the powers and duties of Lead Local Flood Authority in the Flood & Water Management Act 2010, the Flood Risk Regulations 2009, and the Land Drainage Act 1991.

3. POLICY CONTEXT

- 3.1 To secure the most effective use of resources in the delivery of high quality, best value public service.
- 3.2 To prevent loss of life or serious injury, maintain access for emergency services, protect vital facilities within the community and to protect Reading Borough Council property.

4. BACKGROUND

- 4.1 The Flood and Water Management Act 2010 (FWMA) gained Royal Assent on 8th April 2010. This includes statutory provisions for implementation of recommendations in the Pitt Review following the July 2007 exceptional rainfall event. County and Unitary Authorities have been designated as the Lead Local Flood Authority (LLFA) and given the leadership role for local flood risk management from all sources of flooding, except main rivers and the sea.
- 4.2 The FWMA 2010 identifies areas where the LLFA is expected to carry out duties as set out in Section 5 of this report.
- 4.3 The Council also has a statutory obligation under the Flood Risk Regulations (2009), which sit side by side with the FWMA, and this obligation includes the preparation of a Preliminary Flood Risk Assessment (PFRA) for Reading.
- 4.4 This report deals with the main areas of new responsibility assigned to the LLFA. The requirement for local flood risk management by appropriate authorities was identified through development of government policy and studies by Department for Environment, Food & Rural Affairs (DEFRA) over the last decade, together with The Pitt Review of the summer flooding events of July 2007 and its recommendations to mitigate such events in the future. The processes covered in this report reflect the legislation resulting from that process.

5. LEAD LOCAL FLOOD AUTHORITY DUTIES

- 5.1 Schedule 2 of the FWMA amends other Acts and under the amended Section 14A of the Land Drainage Act 1991, LLFA's have the power to carry out works to manage flood risk from surface water runoff, groundwater and ordinary watercourses, where the work is desirable having regard to the 'local strategy for flood risk management'.
- 5.2 Amended Section 23 of the Land Drainage Act 1991 - Regulation of Ordinary Watercourses transferred the responsibility for the Regulation of Ordinary Watercourses from the Environment Agency to LLFA's in April 2012, to ensure that flood risk is managed appropriately.

The Regulation consists of two elements:

- Issuing of Consents for any works to ordinary watercourses that might obstruct or alter the flow of an ordinary watercourse;
- Enforcement action to rectify unlawful and potentially damaging work to a watercourse.

The Council's consent as LLFA will now be required for works which may affect the flow of water within an ordinary watercourse, which includes any ditch or stream that is not designated as a Main River (Main Rivers remain the

responsibility of the Environment Agency). A fee (currently set by statute at £50) is payable for the application for consent.

5.3 FWMA Section 30-and Schedule 1 - Power to designate structures and features that affect flooding. The LLFA and the Environment Agency are 'Designating Authorities', allowing them to 'designate' features or structures where the following four conditions are met:

- The designating authority thinks the existence or location of the structure or feature affects a flood risk;
- The designating authority has flood risk management functions in respect of the risk which is affected;
- The structure or feature is not designated by another authority; and
- The owner of the structure or feature is not a designating authority.

If an asset becomes 'designated' its owner cannot alter or remove it without first consulting the designating risk management authority.

The aim of designating flood risk assets is to safeguard against unchecked works which could increase flood risk in the area. Designating of features is not something that should be done regularly but only when there are concerns about the asset.

An individual may appeal against a designation notice, refusal of consent, the conditions placed on consent or an enforcement notice.

5.4 FWMA Section 14 - Powers to request information from any person in connection with the authority's flood risk management functions.

5.5 The Flood Risk Regulations 2009 - Part 2, impose duties on Lead Local Flood Authorities to prepare Preliminary Flood Risk Assessment Reports (PFRA's) of past and potential future flooding in each river basin district. All Councils have now produced PFRA's which can be found on the relevant Authority's website, including Reading Borough Council. There is also a duty to identify flood risk areas.

5.6 FWMA Section 19 - Reporting Flood Incidents: On becoming aware of a flood the LLFA must, if it considers it necessary or appropriate, investigate which risk management authorities have relevant flood risk management functions and whether each authority has exercised or is proposing to exercise those functions in response to a flood. It must publish the results of its investigation and notify the risk management authorities. (Risk management authorities are the Environment Agency, LLFAs, highway authorities, water companies etc.) The collection of precise details from an actual flood incident is vital in providing an accurate picture of the flood risk across the Borough. Thames

Water and the Highways Agency may respond to certain incidents so a process needs to be formulated to allow this data to be shared with each Authority.

- 5.7 FWMA Section 19 - The aim of a Flood Investigation Report is to identify the causes of flooding, propose potential mitigation measures and flood risk management actions, and to communicate these to the public. Investigations will involve consultation with the relevant risk management authorities, landowners and private organisations involved.

Reports will provide clear and thorough understanding of flood incidents, but the duty to investigate does not guarantee that problems will be resolved. Discussions about the next steps following the incident will be made by the parties involved.

- 5.8 FWMA Section 21 - Register and Record of Flood Risk Assets, which are structures or features which are considered to have an effect on flood risk.

The LLFA's are required to keep both an asset record (for use by risk management authorities) and an asset register (available for inspection by the public at all reasonable times).

The Asset Register (for public uses) may include a map of local flood risk assets across the Boroughs and should clarify whether the Asset is publically or privately owned. The Asset Record (for LLFA use) will then provide further information about each asset, its condition and contact details of owner/maintainer if available. This can then be used to investigate cases where flood risk asset issues have been reported.

- 5.9 FWMA Section 32 and Schedule 3 - Sustainable Urban Drainage Systems: SuDS Approving Body (SAB) - Noted that implementation date still to be advised by DEFRA and EA and expected within next 18 months.

In future all construction and development works which have a drainage implication must be approved by the SAB. Applications will be either submitted to the approving body as free-standing applications or combined with an application for planning permission (either outline or full). The SuDS approval process is designed to be separate from the current planning system; however, the two bodies will liaise and advise each other of their respective decisions.

The SAB must review and assess the applications in line with the new National Standards (not yet published) for sustainable drainage and either grant or refuse consent. A number of stakeholders will be consulted as part of the review process including the Water and Sewerage Company (WaSC), the Environment Agency, relevant Highway Authority, Canals and Rivers Trust and (where appropriate) any Internal drainage boards.

The SAB will have a duty to adopt and maintain drainage systems (when requested to do so) that have been approved and constructed in accordance with the National Standards, with the exception of single property systems and publicly maintained roads.

The SAB will be able to charge application fees for the design review and approvals, and recover site inspection costs during the construction process. However, there is currently no mechanism for securing commuted sums toward long term maintenance.

5.10 FWMA Section 9 - Local Flood Risk Management Strategy

A LLFA must develop, maintain, apply and monitor a strategy for local management of flood risk within its area.

This provision came partially into force from 1st October 2010 and local strategy should be developed within a reasonable timeframe. The Local Strategy must include the following elements:

- a) the risk management authorities in the authority's area,
- b) the flood risk management functions that may be exercised by those authorities,
- c) the objectives for managing local flood risk,
- d) the measures proposed to achieve those objectives,
- e) how and when the measures are expected to be implemented,
- f) the costs and benefits of those measures, and how they are to be paid for,
- g) the assessment of local flood risk for the purpose of the strategy,
- h) how and when the strategy is to be reviewed, and,
- i) how the strategy contributes to the achievement of wider environmental objectives.

The LLFA must consult the other risk management authorities and the public about its Local Strategy and publish a summary. The local strategy must be consistent with the National Strategy produced by the EA for Flood and Coastal Erosion Risk Management (FCERM) for England.

The Council in conjunction with the Berkshire Five Flood Risk Authorities, (excludes Slough as they are not within Thames catchment area), has prepared a preliminary high level overarching Local Strategy for Berkshire County, which will need to be further supplemented with a detailed flood risk management strategy for Reading Borough.

6 PROPOSAL

- 6.1 This report seeks **Strategic Environment, Planning & Transport Committee** approval to delegate authority to the Head of Highways and Transport, to carry out the Lead Local Flood Authority Duties and powers as set out in the Flood & Water Management Act 2010, the Flood Risk Regulations 2009 and the Land Drainage Act 1991.

7. CONTRIBUTION TO STRATEGIC AIMS

- 7.1 To promote equality, social inclusion and a safe and healthy environment for all.
- 7.2 To develop Reading as a Green City with a sustainable environment and economy at the heart of the Thames Valley.

8. COMMUNITY ENGAGEMENT AND INFORMATION

- 8.1 The report on the work of the Preliminary Flood Risk Assessment, Flood Risk Asset Register, Flood Incident Reports and Local Flood Risk Strategy will be placed in the public domain.

9. LEGAL IMPLICATIONS

- 9.1 The Flood and Water Management Act 2010 requires the Borough Council to take the leadership role for ensuring significant risk from all sources of flooding is identified and managed. This will be done through the preparation of a Preliminary Flood Risk Assessment, a Surface Water Management Plan and the Local Flood Risk Management Strategy.

10. FINANCIAL IMPLICATIONS

- 10.1 The Borough Council will continue to bid for funding from DEFRA and the EA through the annual Flood Defence Grant in Aid (FDGiA) funding mechanism.
- 10.2 The Borough Council has a dedicated Revenue budget to comply with the requirements of the FWMA.
- 10.3 The FWMA 2010 includes a statutory fee payable to the LLFA of £ 50 for each Consenting on Ordinary Watercourse application.

The financial implications arising from the proposals set out in this report are set out below:-

Revenue Implications

| Revenue Programme reference from budget book: page line | 2012/13 | 2013/14 | 2014/15 |
|---|----------|----------|--|
| | £ 50,000 | £ 50,000 | £ 50,000 (Subject to Cabinet Approval March 2014) |

Capital Implications

| Capital Programme reference from budget book: page line | 2012/13 | 2013/14 | 2014/15 |
|---|---|-------------------------------|------------------------------|
| | £000 | £000 | £000 |
| Proposed Capital Expenditure | £ 54,000 | 0 | Subject to LTP funding award |
| Funded by EA FDGiA Grant | £ 54,000 (Flood Defence Grant in Aid (FDGiA) awarded by EA) | £ 7,000 (FDGiA Awarded by EA) | TBC with future FDGiA bids |
| Total Funding | £ 158,000 | £ 57,000 | TBC |

11 Risk Assessment.

Lead Local Flood Authority Councils are required to carry out their designated statutory duties, as described in the Flood and Water Management Act 2010.

12. BACKGROUND PAPERS

- Previous reports to Cabinet and CCEA Scrutiny.
- Flood & Water Management Act 2010.
- Flood Risk Regulations 2009.
- Land Drainage Act 1991.

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ENVIRONMENT, CULTURE AND SPORT

| | | | |
|-------------------------|---|---------------------|---|
| TO: | STRATEGIC ENVIRONMENT, PLANNING & TRANSPORT COMMITTEE | | |
| DATE: | 9 th JULY 2013 | AGENDA ITEM: | 14 |
| TITLE: | DEPARTMENT FOR TRANSPORT - PINCH POINT FUNDING UPDATE | | |
| LEAD COUNCILLOR: | COUNCILLOR TONY PAGE | PORTFOLIO: | STRATEGIC ENVIRONMENT, PLANNING & TRANSPORT |
| SERVICE: | TRANSPORT | WARDS: | BOROUGH WIDE |
| LEAD OFFICER: | RUTH LEUILLETTE/ LAWRENCE THURBIN | TEL: | 0118 937 2069 0118 937 2451 |
| JOB TITLE: | DEPUTY HEAD OF HIGHWAYS & TRANSPORT / SENIOR TRANSPORT PLANNER | E-MAIL: | ruth.leuillette@reading.gov.uk lawrence.thurbin@reading.gov.uk |

1. EXECUTIVE SUMMARY

- 1.1 To update the Strategic Environment, Planning & Transport Committee on the Pinch Point applications that the Council submitted to the Department for Transport for improvements to the highway network to improve traffic flow.

2. RECOMMENDED ACTION

- 2.1 That the Strategic Environment, Planning & Transport Committee note the report and the successful award of grant funding for the A33 Congestion Relief Pinchpoint Scheme and the Reading Bridge Structural Improvements & Traffic Management Pinchpoint Scheme.
- 2.2 That the Committee agree to officers submitting a future report seeking detailed scheme and spend approval.

3. POLICY CONTEXT

- 3.1 The proposals are in line with the Reading Borough Council's adopted third Local Transport Plan.
- 3.2 The bids submitted received support from the Thames Valley Berkshire Local Enterprise Partnership (LEP) which supports the Berkshire Local Investment Plan.

4. BACKGROUND

- 4.1 The Council submitted three bids to the Department for Transport's (DfT) Pinch Point fund. The fund, for which £170 million was available, is to support improvements to the highway network that would remove/reduce current or future bottlenecks. The intention of the fund is to support economic growth by addressing barriers that restrict the movement of goods and people.
- 4.2 The intention of the fund is to secure an immediate impact, and so was aligned for supporting schemes that could be delivered quickly within the required timeframe. The DfT grant funding is required to be spent within the 2013/14 and 2014/15 financial years with all bids required to have at least 30% of funding from local contributions.
- 4.3 Successful bids were identified as those that would provide new or improved links to key economic sites, tackle congestion, or address the condition of highway structures that are close to becoming a barrier to access. Bids could fall into the below categories:
- Small schemes, which is for those between £1 million to £5 million;
 - Large schemes, which is for those between £5 million to £20 million;
 - And, structural maintenance schemes. Bids in this category were to address highway structures that are in need of maintenance due to issues such as age, weathering, and general deterioration due to heavy traffic volumes, and where a failure would result in serious issues for congestion on the highway.
- 4.5 The three bids that the Council submitted were:
- Reading Bridge Structural Improvements and Traffic Management;
 - A33 Congestion Relief; and
 - A4 Eastern Gateway Improvements.

5. SUCCESSFUL BIDS

- 5.1 The Department for Transport (DfT) announced on 31st May 2013 that Reading Borough Council had been awarded funding for two of the bid submissions. The Council was awarded £3.067 million for Reading Bridge Structural Improvements and Traffic Management Pinchpoint scheme and £1.442 million for A33 Congestion Relief Pinchpoint Scheme.

5.2 The initial funding profiles (£million) of the awarded bids are identified below:

| Scheme | Total (£m) | DfT grant funding | | Local contributions |
|----------------|------------|-------------------|---------|---------------------|
| | | 2013/14 | 2014/15 | 2013-15 |
| Reading Bridge | 4.383 | 0.142 | 2.925 | 1.316 |
| A33 | 2.06 | 0.401 | 1.041 | 0.618 |

5.3 The Reading Bridge structural maintenance scheme will address issues that have been identified in the structure as a result of long-term exposure to weather where water leakage through the structure has caused deterioration. Without this work the bridge may have required a weight restriction to be applied in the future, which would create a significant highway pinch point. As the works to the bridge include structural strengthening and re-waterproofing and resurfacing there is also the opportunity to include investigating the introduction of a 'tidal flow' lane traffic management system to maximise the capacity for peak time traffic southbound in the morning and northbound in the evening.

5.4 The A33 scheme comprises a range of measures to improve journey time reliability and reduce congestion along the corridor. This includes extending the left-turn filter lanes for exiting the A33 onto Rose Kiln Lane (north and southbound); providing more direct pedestrian and cycle links alongside the A33 crossing of the Kennet; providing an alternative pedestrian and cycle route to negotiate seasonal flooding around the Bennet Road area; and partial signalling at peak times only of the junction of the A33 with South Oak Way.

5.5 The A4 bid was not awarded any funding. The total cost for this scheme, including local contributions, was £1.546 million. Funding opportunities will continue to be sought for this cross boundary scheme.

5.6 Work will now continue to progress the detailed design and delivery programme, including spend profiles. A further report will be submitted to a future Committee meeting seeking scheme and spend approval.

6. CONTRIBUTION TO STRATEGIC AIMS

6.1 To develop Reading as a Green City with a sustainable environment and economy at the heart of the Thames Valley.

7. COMMUNITY ENGAGEMENT AND INFORMATION

7.1 Project progress and timescales for works will be publicised to inform residents, visitors, and businesses.

7.2 All bids are available on the Council's website at :
<http://www.reading.gov.uk/residents/parking-road-and-travel/TransportStrategy/pinchpoint/>

8. LEGAL IMPLICATIONS

8.1 Statutory procedures will be required to implement some of these measures, where there is a requirement to promote Traffic Regulation Orders.

9. FINANCIAL IMPLICATIONS

9.1 The Council is required to contribute to the cost of the projects as part of the commitment for local funding through a combination of existing Integrated Transport Block government allocations and from Section 106 contributions secured for transport improvements.

9.2 Detailed financial implications will be reported to a future Committee meeting.

10. BACKGROUND PAPERS

10.1 Pinchpoint bid submissions are available on the Council's website at:
<http://www.reading.gov.uk/residents/parking-road-and-travel/TransportStrategy/pinchpoint/>