

CONSULTATION STATEMENT

DRAFT REVISED S106 SUPPLEMENTARY PLANNING DOCUMENT

OCTOBER 2013

Background

- 1.1 The Revised Section 106 Supplementary Planning Document (SPD) will replace the adopted S106 Planning Obligations Supplementary Planning Guidance (SPG) (2004). The SPD will provide detailed guidance for securing planning obligation contributions towards leisure, transport and education as well as setting out other infrastructure for which S106 may be sought, in accordance with national and local policies.
- 1.2 The Draft Revised SPD was prepared in July 2013 as an update to the existing 2004 SPG. Since the time of the adoption of the SPG there have been changes to national and local policy and the revision was required to reflect these policy changes and more current prices.
- 1.3 The intention is to adopt this Document as a SPD Document. This SPD has therefore been prepared in line with Regulation 12 (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012, which states that, before Council adopts a SPD, it must produce a statement setting out:
 - (i) The persons the local planning authority consulted when preparing the supplementary planning document;
 - (ii) A summary of the main issues raised by those persons; and
 - (iii) How those issues have been addressed in the supplementary planning document.

- 1.4 This Document fulfils the requirements of the Regulations, in that it sets out the representations received, and contains a response detailing how the representation has been taken into account in preparing the amended version of SPD.

Consultation

- 1.5 The Draft Revised S106 SPD (July 2013) was subject to community involvement between July 19th and September 20th 2013.
- 1.6 A number of methods were used to seek responses as follows:
 - Mail out - Information was sent to just over 670 individuals, organisations, councillors, and internal officers. This was undertaken via letter or email. As required by the Regulations (Reg. 12), a full list of consultees is included at Annex B.
 - Press release - A press release appeared on the Reading Borough Council's website on 18th July 2013.
 - Other Measures - The SPD was published on the Council's website and was available in hard copy at the ground floor reception of the Council's Civic Offices and at all public libraries in the Borough.

Responses

- 1.7 In total the Council received representations from a total of 15 individuals and groups. The responses covered a few key issues. The following sets out a summary of the matters raised:
- The SPD should include an element of flexibility on the level of funding required rather than a strict adherence to set formulas.
 - The SPD should include text explaining that the level of contribution sought will be subject to viability testing.
 - The SPD does not demonstrate why the obligations sought are justified, or that they would satisfy the three tests set out within Regulation 122 (2) of the Community Infrastructure Levy Regulations 2010
- 1.8 Annex A contains a summary of each representation, together with the response, noting whether any amendments to the Draft Revised SPD are required for the final version for adoption.

Annex A - Schedule of Representations and Council Responses

Customer/ Organisation Details	Summary of Comments Received	Officer Response
Blandy & Blandy	<p>The reference to CIL [Community Infrastructure Levy] regulation 122, the NPPF and in particular the acknowledgement of matters relating to viability is welcomed. So is the acknowledgment that it is the impact of development that needs to be dealt with, and it is not the role of new development to put right existing problems. That point should be made expressly in the introduction.</p> <p>The tenor of the SPD implies that all applications will be dealt with on the basis of a formulaic approach. This is not consistent with Regulation 122 [of CIL]. There is an implication that, for example, the transport contribution sought should always follow the formula. If that is the way in which the SPD is to be applied then that implies that the contributions sought would not be tested against the requirements of Regulation 122. The key question is whether the contribution is necessary and directly related to the development. The correct test is stated in para 8.8 and this should be stated clearly either in the introduction or Section 2 [policy and legal framework].</p> <p>The response does not deal with evidence base. In the interests of the SPD being a clear and robust document no doubt the Borough Council will take full account of representations made in respect of the underlying evidence. As a general comment, we note that the transport contribution is based upon the historic figure applicable to this current year rather than based on anticipated or indeed identified expenditure in the future. Contributions should be directed to specific</p>	<p><u>Partially agreed. Proposed changes.</u></p> <p>Additional references, as in paragraph 8.8, have been added to the introduction and within other sections of the SPD.</p> <p>The SPD is intended to provide a level of certainty for developers in terms of the type of obligations and level of funding which will be sought. It is an update of a document conceived in 2004. However, the SPD will serve as a framework and basis for discussion and the specific obligations secured will need to be in accordance with the relevant CIL Regulation 122 (2) tests and will not be applied as a blanket approach. As is stated in paragraph 1.4 specifically, the consideration of obligations will be in the context of viability and being flexible. This is to ensure that obligations meet the relevant legal tests and are in compliance with the National Planning policy Framework, in terms of not threatening the ability of a site to be developed viably. This is whilst ensuring that a scheme properly mitigates its impact to ensure that it is acceptable in planning terms (reference in para 2.2 of the draft SPD).</p> <p>This revision of the SPD is intended to update the relevant policies and programmes and other information considered out of date from the existing 2004 SPG. This is as a result of issues raised by Planning Inspectors, who it must be noted have not questioned the overall principles</p>

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	<p>infrastructure matters.</p> <p>It is accepted in principle that when an application is submitted details of what may be proposed for any S106 should be set out. It is not always the case however that that process can be applied. The SPD requires front loading. That may not be appropriate particularly when there is no certainty that an application will be approved on planning merits alone. The principle of the development needs to be established first and the impact of it assessed subsequently.</p> <p>Catering facilities and childcare facilities (Para 6.28 & 8.2) will be self-financing. Health provision and policing should be financed out of direct taxation and reference to this infrastructure should be deleted.</p> <p>The reference to community facilities is vague. Is that deliberate?</p>	<p>contained within it. The Council, of course needs to ensure that when seeking planning obligations that the relevant tests are met. The figures for transport are based on a costed plan of transport schemes (set out in the Council's Local Transport Plan 3) and the S106 obligations towards such, would be for specific mitigation relating to a particular scheme and in accordance with the relevant tests. The purpose of the updated SDP is as a short term interim document, until the publication of CIL and a new S106 guidance document, so the figures included are those which are current and not related to some years hence.</p> <p>Especially for major schemes it is likely that there will be certain infrastructure required for mitigation of a scheme. It is important that there are at least early discussions as to the nature of these. It is accepted that the specific impacts will be considered, and relevant mitigation through S106 discussed, once the principle of the development is first established. It is an established part of the Pre-application process that principles of S106 are discussed.</p> <p>The provision of the infrastructure for catering may be required to support an extended leisure offer. It is accepted that the actual operation of it should be self-financing. The wording will be amended in paragraph 6.28.</p> <p>In terms of childcare facilities, again the actual set up/ infrastructure for the provision might be required to support the development in the sense that the development will bring pressures on childcare where there might be a lack of such facilities, but that the ongoing operation of it should be self-financing. This is supported in adopted policies - Core Strategy (CS13), and Sites and Detailed Policies Document (SDPD, DM3). For</p>

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	<p>[The respondent also makes a number of specific suggestions on amended wording for sections throughout the SPD including:] There is no justification for paying the Council's costs where it is necessary to enter into a unilateral undertaking (para 3.5 (iv)). Para 6.20 the calculation of a commuted sum should be dealt with at the relevant time against actual costs rather than simply multiplying an unrelated figure by 50. Para 8.5 what is the justification in policy terms for 1% [for public art]?</p> <p>The SPD needs to make it clearer that each contribution sought will need to be considered on a case-by-case basis. Otherwise the SPD is in danger of falling foul of the principles in the regulations and the NPPF.</p> <p>It needs to be clear what is an aspiration and what is a justification for contribution.</p>	<p>health and police infrastructure this is intended to be for those cases where development brings additional pressures over and above normal planned development, and in areas where there might already be pressures on such infrastructure provision.</p> <p>The existing SPG includes seeking planning obligations towards community facilities and is within policy DM3: Infrastructure. The type of facilities this will include will be included in the final version of the SPD. However, the details of any financial contribution that would be relevant would be based on the specifics of each case and therefore discussed and agreed at that time.</p> <p>A number of minor changes to wording have been made throughout the document, further to the respondent's comments.</p> <p>The 1% for art was an original target identified in the Reading Local Plan and is within the existing 2004 S106 SPG. It originated from the promotion of a percent for art by the Arts Council and the recommendation that this should be done through planning by the incorporation of policies and targets. The wording in para 8.5 has been amended.</p>
English Heritage	Development specific planning obligations offer opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and re-use of buildings or other heritage assets. This should be acknowledged in Section 8.	<p><u>Agreed. Proposed changes.</u></p> <p>Additional wording has been added to Section 8.</p>
Environment Agency	We support definition of open spaces on page 15, which includes wetlands, open and running water and; Green Corridors - including river banks. These areas can	<u>Support noted.</u>

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	<p>provide an opportunity for the enhancement of biodiversity in wet areas and can be multifunctional and be used for flood risk management in some instances. Support the inclusion of Flood mitigation and prevention from policy DM3 of the SDPD (Oct 2012).</p>	
GL Hearn	<p>The transport charge for food retail per 100m2 appears to be very high and may make development unviable. Further analysis of this data is required.</p>	<p><u>Not agreed. No changes proposed.</u></p> <p>The charges for transport are based on an analysis of the latest TRICS trips data resulting in an average daily trip rate arising from specific development types. The trip rate cost is calculated by:</p> <ol style="list-style-type: none"> 1) Applying trip rates against an average figure of development per annum (based on an average over 10 years) to generate a pa trip rate of 12,045 trips. 2) A total cost of schemes is £7.7 million pa, which is the intended LTP programme of deliverable schemes for the next 2 years (as this document is intended as an interim version, with a very limited lifespan, this was considered to be a reasonable approach), and Inspectors have accepted this amount when the Council has justified contribution amounts. Based on historic patterns of transport funding an estimated 47% of the total £7.7m is set against the number of trips generated by new development (£3,634,000). The remainder will be provided through public funding. This equates to an average trip rate cost of £302, i.e. £3,634,000 divided by 12045 (trips). This is a reduction on the rate identified in the 2004 S106 SPG to reflect the change in trip rates for specific types of development. Future LTP Programmes are likely to involve schemes involving similar levels of costs and public funding.

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		Indeed the figure for food retail is a reduction on that in the adopted 2004 SPG and is considered to be a reasonable basis for determining and agreeing transport obligations, where such meet the relevant legal CIL Regulation 122(2) tests.
Jenny Hicks	<p>I welcome any new ways to mitigate all the monies to go the community not just the portion that is agreed at source.</p> <p>Please can you advise why a S106 was reduced with regard to an item last year in Caversham? Hence resulting in reduction paid to the Council. If the developer has signed an agreement stating an amount is to be paid in relation to a S106 then this is law isn't it?</p>	<p><u>Comments noted.</u></p> <p>A response was provided by email to the customer. In summary in general terms, the Government are very keen on allowing developers to renegotiate Section 106 agreements on the grounds of being financially unviable. A process of applying to reduce affordable housing contribution within S106 agreements has also been introduced by the Government along with a right of appeal against refusal of these applications. However, until such time as both parties have agreed to a renegotiated Section 106, then it represents a legal obligation, which should be fulfilled.</p>
Highways Agency	We would be keen to have early discussions with Reading about any identified transport interventions that the S106 might contribute towards that could impact on the M4.	<u>Comments noted.</u>
Natural England	Natural England does not have any comments to make on this document.	<u>Comments noted.</u>
Nimbus Property Developments Ltd	<p>I am a "hobbyist" property developer, and as such am really only interested in smaller in-fill developments whereby the S106 SPD has material consideration on future developments.</p> <p>[For education] A 2 bedroom house is required to pay 133% more contributions than the same bedroomed flat. The rationale is explained in para 7.13. My issue with this is viability. The education portion of a S106 is the major portion. The difference between [the values of] houses and flats does not justify a 133% difference [between S106]. The statistics used to derive the values are unfair: One set of figures (for houses) is produced by an independent organisation;</p>	<p><u>Partially agreed. Proposed changes.</u></p> <p>The percentage difference is actually lower than the respondent has identified and indeed is significantly lower than that in the existing SPG (ca 194% difference). In any case the basis of the figure is the pupil product ratio related to property type and bedroom numbers. Evidence shows that houses produce higher numbers of pupils than flats. The policy is about mitigating</p>

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	<p>One set (flats) by Reading BC; Both sets of data are hopelessly old; No independent review of the figures has been seen; The amount of flats/ apartments has mushroomed in the past 12 years; The statistics only work if there are an equal number of flats and houses.</p> <p>Given the data is from two different organisation and the data is hopelessly old, it would be prudent to ignore the data and either rebalance the numbers based on house prices which can be accurately garnered from the Land Registry. S106 and affordable housing contributions must be viable or take a study if the current snapshot of pupils in RBCS' education gather their addresses and identify if they are houses or flats which is a simple IT exercise in order to justify the figures used.</p> <p>Request that the contribution level is raised for flats and lowered for housing.</p> <p>Large dwelling is termed >75sqm through the SPD, but as a medium dwelling of 3 bedrooms in Table 2. 75 sqm is not large at all. Since contributions are based on number of people in the house, then it would be better to delineate on number of bedrooms. Alternatively term large dwellings bigger than 75sqm, such as 85sqm.</p> <p>Whilst there has been delineation for education between flats and houses, I see it as perverse that the same has happened here [contributions towards open space provision]. Clearly flats, due to the lack of private gardens, require more provision for open space, such as parks, yet there is no delineation. The calculations should have some offset for developers providing garden space.</p>	<p>impacts. The issue of viability is not really relevant. It is accepted that the figures are a number of years old, but as this was an interim study, with a limited lifespan it was considered that an update of the figures, based on readily available information, would be the most cost effective approach. There is no updated pupil product information. Also at the time of producing the draft there were limited additional census figures available upon which to base an assessment of likely numbers of school age children being generated from new development. The fact that the existing pupil product data was based on a study and internal work does not make them invalid. However, it is not agreed that it would be a simple IT exercise to gather address of pupils and then cross refer this to determine what sort of properties and how many bedrooms.</p> <p>Using house prices as a basis for determining relevant contributions does not appear to be a reasonable basis as this has no relationship to the number of children being generated from the development. No clear justification is presented to justify the suggestion that the contribution level should be raised for flats and lowered for houses.</p> <p>Table 4 has been amended to state dwellings up to and including 75m², and above 75m². This floorspace is the minimum size where a property has a larger number of bedrooms. It is reasonable for large families, who have more diverse leisure needs, to make a larger contribution to publicly provided leisure facilities.</p> <p>Leisure space is not only about being out of doors but also about leisure opportunities that cannot be satisfied in a private garden: playing football, walking the dog, outings for small children, social recreation, etc. People living in dwellings with</p>

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	<p>The use of the RPI as an inflator for S106 is obvious for the Local Council to use. However, it is not linked with anything that the Council provides. Either CPI or house value would work as one is tied to viability and one is tied to the inflator of where the contributions are sought. RPI is just pure fantasy and has no real correlation to providing an equitable inflator to S106 contributions.</p>	<p>private gardens use public open space for recreational purposes every bit as much as (families often more than) flat dwellers.</p> <p>It is standard practice to use the RPI, which is the nationally recognised inflator.</p>
<p>Deloitte LLP on behalf of Oxford Properties</p>	<p>As a major landowner Oxford properties is keen to continue to actively engage with Reading Council to ensure that future development proposals to expand Green Park continue to be viable. It is critical to ensure that the proposed level of planning contributions, either via S106 or future CIL would not undermine the future investment and economic growth potential of this regionally significant employment location.</p> <p>We would welcome clarification of how the threshold of a net addition of 100sqm of floorspace has been proposed, as this could result in relatively small-scale developments, which could not possibly cause stresses on education, open space and transport for example, being brought into the potential realm of S106 contributions.</p> <p>The phraseology used in the SDP should reflect wording of the National Planning Policy Framework (NPPF) Para 173, that to ensure viability the costs of any Section 106 requirements should <i>“when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land developer to enable the development to be deliverable.”</i></p> <p>The SPD should make it clear, notwithstanding the standard tariffs provided (as guidance) that the Local Planning Authority will work with the developer to understand the precise level of mitigation required with any scheme, and make every effort to minimise these costs where possible in order to incentivise development.</p> <p>In terms of the contribution towards wider transport impacts, we support the principle of a reduction in financial contribution (compared to 2004 SPG) across all development types, which reflects market conditions and the reduction in average</p>	<p><u>Partially agreed. Proposed changes</u></p> <p>This threshold has been carried forward from the existing S106 SPG (2004) and is considered to be the minimum scale of development where there might be impacts (specifically in terms of the transport network). Only the relevant obligations will be applied which meet the CIL Regulation 122(2) tests.</p> <p>The SPD refers specifically to para 173 of the NPPF regarding that the scale of obligations does not threaten the ability of a site to be developed viably. Further clarification will be provided in the introduction.</p> <p>The figures presented in the SPD are intended to be a framework to provide some certainty to developers as to the level of contributions, which might be applied, notwithstanding the requirements for any obligations to meet the relevant legal tests. There is the ability for developers to present their specific case in terms of trip generation etc., which will impact on the overall obligations required to mitigate the</p>

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	<p>daily trips. It should be clear that the Local Planning Authority will work with the developer to minimise the costs of any required mitigation.</p> <p>We note the approach of the SPD, which requires all new development to make provision for the open space needs of the development (rather than just residential development as previously).</p> <p>Given the extensive amount of open space already provided at Green Park or planned as part of extant planning permissions, we do not consider that the area could be assessed as having a deficiency in this regard. In this scenario the SPD suggests that an off-site open space contribution could potentially be triggered by any future development at Green Park that meets the threshold of the SPD.</p> <p>We suggest that the policy wording should recognise exceptions like Green Park, where the quality of open space already provided, the commitment to maintaining and enhancing the existing open space, as well as providing further on-site open space as part of any future development, mean that a significant contribution has been made to open space and that the requirement for any further contribution in this regard should be assessed within this context.</p> <p>In line with the SDPD Policy DM3: Infrastructure, we recommend that the policy wording should recognise that where there is a challenge to viability and where earlier phases of a development have already delivered significant levels of infrastructure capable of serving future development phases, this should be taken into account in the Council's approach to contributions.</p>	<p>impacts of the scheme. This flexible approach is set out in the SPD.</p> <p>Seeking open space obligations for other developments to residential reflects the approach, which has been applied over a number of years, and is about the use of urban space relevant to those uses.</p> <p>The site specifics of a case would be discussed and considered at the time of the consideration of a scheme and would affect the level of contributions sought. The SPD includes flexibility within it and the figures are guidelines to be applied on a site by site basis. The specifics of each case are taken into account and obligations sought which are in accordance with the relevant legal tests.</p> <p>The SPD makes specific reference to SDPD policy DM3 and further reiterates the issue regarding viability.</p>
<p>Quod on behalf of Sackville Developments (Reading) Ltd</p>	<p>We have a number of concerns with the content and evidence base underpinning the draft document.</p> <p>Regulation 122 (2) of the CIL Regulations provides that a planning obligation may only constitute a reason for granting planning permission if the obligation is: Necessary to make development acceptable in planning terms; Directly related to the development; and Fairly and reasonably related in scale and kind to the development.</p> <p>Paragraph 204 of the NPPF states that planning obligations can only be sought where they meet all the tests. It is important for any policies which the Council adopt to be compliant with the regulations otherwise they can be disregarded at</p>	<p><u>Partially agreed. Proposed changes.</u></p> <p>As is stated in paragraph 1.4 specifically, the consideration of obligations will be in the context of viability and being flexible. This is to ensure that obligations meet the relevant legal tests and are in compliance with the National Planning policy Framework, in terms of not threatening the ability of a site to be developed viably.</p> <p>This is an interim version, which updates the existing 2004 S106 SPG, which has been in use for almost 10 years. The update is to reflect new</p>

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	<p>the planning application stage. Paragraph 153 of the NPPF provides specific guidance in respect of SPDs and makes specific reference to the need for clear justification and not imposing financial burdens as follows: <i>“Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development”</i>.</p> <p>National Planning Practice Guidance has recently been published by the Government. The guidance includes the following provisions:</p> <ul style="list-style-type: none"> • Policies for seeking obligations should be set out in a development plan document. SPDs should not be used to add unnecessarily to the financial burdens on development and should not be used to set rates or charges which have not been established through development plan policy. • In all cases, including where tariff style charges are sought, the local planning authority must ensure that the obligations meets the relevant tests. They will need to be able to justify the contributions sought • Obligations should only be sought where they are necessary to make development acceptable in planning terms. Where local planning authorities are requiring affordable housing contribution or tariff style contributions, they should be flexible in their requirements. The policy should be clear that such obligations will take into account specific site circumstances. <p>Welcome recognition that the Council will take into account viability considerations. However, viability considerations should also be an integral part of the policy making itself with the tariffs proposed scrutinised in the context of viability considerations. It is not apparent that has been taken into account at all in this draft SPD.</p>	<p>policies, increased costs, so is not considered to unnecessarily add to the financial burden on development. There is flexibility in the approach, which takes account of viability considerations.</p> <p>A further S106 guidance document will be produced alongside the introduction of CIL. This version is an update of an existing SPG. The relevant tests will be applied when seeking planning obligations. Site specific considerations will be taken into account as referred to in para 8.8 and additional wording will be added to reiterate this, within the introduction section.</p> <p>The rates presented are an update of the existing SPG figures and are intended to provide a level of certainty to developers, but will be applied in accordance with relevant tests and the overall obligations determined with regard to viability considerations and a flexible approach.</p> <p>While the figures are not directly comparable to CIL charges, they will produce contributions that are likely to not be too dissimilar to the charges per unit under CIL. The proposed CIL charges have been subject to viability assessment. To that extent it is incorrect to say that the proposed figures have not been scrutinised in terms of their impact on CIL. In any case any development that does not mitigate its impacts on infrastructure is</p>

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	<p>The BC is proposing to introduce a transport tariff based on a series of transport improvements included in its local transport plan. This is not in itself an unreasonable approach provided contributions are proportionate to identified impacts on new development and resulting contributions do not affect development viability.</p> <p>It is not at all transparent how the BC has translated the [spending plan of £7.7million pa] into a contribution requirement of £302 per daily trip. It is also unclear why reference is made to a 2 year spending plan and how this relates to planned development. The table in the Traffic Management Advisory Panel Report Mar 2013 shows costs which do not appear to reflect this. This report gives estimated costs of projects in the upcoming financial year, but it is not clear whether spend will be spread evenly over the following years. In some cases, the spend is totalled in 2013/14, but the scheme is not identified to be progress until 2015/16. There are also no details of how the £7.7m spend has been calculated and what proportion of the spend has already been secured.</p> <p>The level of planned development associated with this contribution calculation is also not included. Therefore if the figure of £302 per trip has any basis at all, it is neither transparent from the draft SPD, or backed up by supporting documents.</p> <p>There is no indication of the scale of development assumed, the timing of its delivery in relation to transport infrastructure, or explanation about why the contributions are considered proportionate.</p> <p>It is not evident that the proposed tariff is demonstrably robust, proportionate and therefore consistent with Regulation 122 tests.</p> <p>The SPD proposes an open space tariff for office development based on a formulae relating to employees and visitors. It is based on an unsubstantiated assertion that £2.5million is required to repair and maintain open space. This is then divided by the number of users per year plus additional users (calculated by how many additional visits would be from new office building) and then multiplying this to give a cost. This is overly complicated and is flawed as follows:</p> <ul style="list-style-type: none"> • By adding the additional users into the denominator to work out the cost of maintenance per users, implies that the number of users does not 	<p>unlikely to be sustainable development and is therefore likely to be refused.</p> <p>Additional wording is included within the Transport section of the SPD to provide explanation as to basis of the £302 per daily trip.</p> <p>The £7.7 million pa is what the intended LTP programme would be for the next 2 years (as this document is intended as an interim version, with a very limited lifespan, this was considered to be a reasonable approach), and Inspectors have accepted this amount when the Council has justified contribution amounts.</p> <p>This section has been amended to identify that seeking this obligation would be on a site by site basis and would be related to the specific impacts of a scheme in relation to the relevant infrastructure. This consideration would apply to employment generating schemes of 1000m2 and above.</p> <p>Survey work was undertaken to determine</p>

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	<p>impact in the cost, therefore additional users do not increase the cost of maintenance;</p> <ul style="list-style-type: none"> • There is not empirical evidence to demonstrate that each office employee uses a park once a week, and no explanation why, even if this was a reasonable assumption, why other employees (e.g. working in hospitals, school, shops etc) would not also generate demand for open space. • No account has been taken of the significant additional income from business rates which will assist in funding of parks and other infrastructure <p>No justification has been provide of the level of tariff for hotel and serviced apartments.</p> <p>No evidence has been provided to explain how the rate of £2,100/£2,800 has been calculated. This lack of transparency is unsatisfactory and means that it is not possible for the Council to demonstrate that any tariff is proportionate.</p> <p>The cost per school place has not been broken down per phase of education. It is unclear without proper justification impossible to judge where the proposed tariff meets the test in Regulation 122.</p> <p>Before the Council can adopt any revised policies relating to S106 tariffs it must address the deficit in the evidence base and thoroughly review and justify its approach. Recommend that the Council re-consults.</p>	<p>occupancy levels of hotels and a reasonable assumption regarding the level of hotel users who would visit open spaces during their stay.</p> <p>For visitor numbers sampling was undertaken and extrapolated as appropriate. A reasonable assumption was applied as to the numbers of office workers using open spaces.</p> <p>The original 2004 SPG figures were based on a national average being applied by other Local Authorities. These 2004 figures have been updated to take account of inflation. The other figures for other uses are a percentage of these, as explained in the footnotes to Table 4.</p> <p>Previously there was a build cost for primary and a build cost for secondary. These nationally produced figures have not been updated for a number of years. Using BCIS data to try and update these, generated significantly higher figures than what is presented in the revised SPD. It was considered that a more modest increase would be appropriate. The basis of the revised figures is using a gap funding approach, i.e. after other funding sources have been taken into account, what level of costs would be required per place to be apportioned to developments, related to the number of children generated from them. This cost per place single figure is then applied to the pupil product ratio.</p> <p>There will be no additional consultation. Indeed this is an interim version and there will be a new S106 guidance to operate alongside CIL, which will be consulted on.</p>

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<p>Savills on behalf of Scottish Widows Investment Partnership</p>	<p>We are concerned that a single category for Retail (Non-food) does not take into account the broad sub-categories within non-food retail operations and the different values inherent within these sub-categories. The existence of sub-categories is recognised in the [Council's] 'Retail Assessment for Reading Central Area Action Plan'.</p> <p>The application of a single contribution level for all non-food retail does not take account of the different characteristics and trip generation associated with the individual no-food sub categories. This would adversely affect the viability of new bulky goods floorspace due to the lower rental and investment values of such floorspace. We request that the LPA creates new sub-categories. Also consider that provision should be made to allow lower payments associated with the creation of additional floorspace at mezzanine level within existing premises. The majority of the custom from new mezzanine floorspace will be from existing customers already visiting a retail destination, therefore these trips will already have been on the highways network. The SPD should include provision for a separate assessment of the trip generation for new mezzanine to ensure that the contribution levels do not adversely affect the viability of such developments.</p> <p>The proposed retail non-food contribution for transport doubles from the 2004 SPG. When this contribution is considered against CIL or wider development costs, the proposed contribution levels would adversely affect the viability of new development. We consider that the Revised SPD provides for an unsustainable increase in contribution levels, which will suppress future retail investment in Reading. The contribution level should be reduced for non-food retail.</p> <p>Recommend that the SPD is amended to ensure that the proposed transport contributions meet the NPPF tests.</p>	<p><u>Not agreed. No changes proposed.</u></p> <p>The TRICS data was based on the analysis of various non-food retail uses and is averaged out. At application stage an applicant is able to submit specific data to justify that the figure proposed is high and this will be considered by officers.</p> <p>The installation of Mezzanine floors does not mean that the customers would already be visiting that retail destination. It can allow a significant number of alternative products to be purchased and may result in trips diverting from one retail destination to another. Such trips may have material implications on transport flows in the vicinity of the retail unit.</p> <p>This updated SPD is intended as an interim version and a new S106 SPD will be published and consulted on, which will operate alongside the future introduction of CIL.</p>
<p>Sport England</p>	<p>Sport England supports that financial contributions would be based on recommendations made by the Council's strategies. It is therefore important that these are robust and kept up to date. In this respect, it is noted that the Council's Open Spaces Strategy was published in 2007.</p> <p>Sport England is currently developing guidance on how to undertake an assessment of needs and opportunities for sporting provision. It is intended that this guidance will assist with meeting the requirement for robust and up to date assessments</p>	<p><u>Comments noted.</u></p> <p>The policies on which we base negotiations for S106 postdate the Open Spaces Strategy. The Council keeps an up-to-date record of the relevant infrastructure needs for open space, area by area. Site- specific assessments are provided of where recreational capacity needs enhancement, to</p>

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	<p>required by the NPPF. The Sports Facility Calculator can be used to estimate the amount of demand for swimming pools, sports halls and artificial grass pitches created by a given population.</p>	<p>make a development acceptable in planning terms. We welcome Sport England's guidance and will take account of it when it is published.</p>
<p>Savills on behalf of Standard Life Investments Ltd</p>	<p>We are concerned that a single category for Retail (Non-food) does not take into account the broad sub-categories within non-food retail operations and the different values inherent within these sub-categories. The existence of sub-categories is recognised in the [Council's] 'Retail Assessment for Reading Central Area Action Plan'.</p> <p>The application of a single contribution level for all non-food retail does not take account of the different characteristics and trip generation associated with the individual no-food sub categories. This would adversely affect the viability of new bulky goods floorspace due to the lower rental and investment values of such floorspace. We request that the LPA creates new sub-categories. Also consider that provision should be made to allow lower payments associated with the creation of additional floorspace at mezzanine level within existing premises. The majority of the custom from new mezzanine floorspace will be from existing customers already visiting a retail destination, therefore these trips will already have been on the highways network. The SPD should include provision for a separate assessment of the trip generation for new mezzanine to ensure that the contribution levels do not adversely affect the viability of such developments.</p> <p>The proposed retail non-food contribution for transport doubles from the 2004 SPG. When this contribution is considered against CIL or wider development costs, the proposed contribution levels would adversely affect the viability of new development. We consider that the Revised SPD provides for an unsustainable increase in contribution levels, which will suppress future retail investment in Reading. The contribution level should be reduced for non-food retail.</p> <p>Recommend that the SPD is amended to ensure that the proposed transport contributions meet the NPPF tests.</p>	<p><u>Not agreed. No changes proposed</u></p> <p>The TRICS data was based on the analysis of various non-food retail uses and is averaged out. At application stage an applicant is able to submit specific data to justify that the figure proposed is high and this will be considered by officers.</p> <p>The installation of Mezzanine floors does not mean that the customers would already be visiting that retail destination. It can allow a significant number of alternative products to be purchased and may result in trips diverting from one retail destination to another. Such trips may have material implications on transport flows in the vicinity of the retail unit.</p> <p>This updated SPD is intended as an interim version and a new S106 SPD will be published and consulted on, which will operate alongside the future introduction of CIL.</p>
<p>Barton Willmore on behalf of the University of Reading</p>	<p>It is apparent from a review of RBC's emerging CIL policy that, following the introduction of CIL, the remit of S106 SPD will be scaled back. The intention is that funding for wider infrastructure schemes identified that are currently addressed in the S106 SPD will instead be sourced through CIL rather than S106. Propose amended wording to para 1.3 [regarding the nature of the SPD and its</p>	<p><u>Partially Agreed. Changes Proposed.</u></p> <p>Paragraph 1.3 is considered to satisfactorily state that the intention is that the revised S106 SPD will be an interim version. The specifics of what will be sought from S106 once CIL is introduced will form part of a separate consultation and the</p>

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	<p>revision once CIL is introduced]. In our view the wording of para 3.6 is inappropriate. It suggests that planning obligations are on offer, whereas they can only be sought where the three legal tests are met.</p> <p>The Borough Council should not adopt the view that contributions payable from development should simply be based on those figures. Regardless of the presence of a tariff based calculation method, it is still essential to have regard to other matters, including national planning policies and the necessity of the contribution being made in individual cases.</p> <p>The University does not accept that contributions towards the ongoing costs of monitoring the implementation and payment of planning contributions is justified. It is a statutory duty. The SPD should be amended to acknowledge that contributions towards monitoring will not be sought.</p> <p>Suggest that para 5.5 is amended to ensure that all developments pay a fair and equitable contribution towards the wider transport improvements while also addressing specific local improvement needs generated specifically as a result of those developments.</p> <p>Suggest that para 5.7 is amended [to remove reference to the wider transport system being already every congested and not all proposed development would create a significant impact on the transport systems].</p> <p>A number of important parameters are used within the calculation methodology presented in paragraph 5.12 [transport]. However, it is not evident whether these parameters are assumed or are based on evidence.</p> <p>To provide greater transparency it is therefore recommended that this is expanded to clarify the evidence base used when deriving the parameters as follows:</p> <ul style="list-style-type: none"> • How has the £7.7million been derived? • It is understood from discussions with RBC that the S106 obligations allow 	<p>relevant detail included at that time. Clearly any obligations need to be in accordance with the relevant legal tests and considered within the relevant policy framework.</p> <p>The SPD seeks to present a level of certainty and a framework for discussion with developers, but obligations sought will be subject to meeting the legal tests and the specifics of each case.</p> <p>Under S111 of the 1972 Local Government Act “a local authority shall have power to do anything ...which is calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions.” It is part of normal contractual arrangements and we are able to agree terms and conditions as appropriate. This approach is common among local authorities. Monitoring of planning obligations is not a statutory duty.</p> <p>Paragraph 5.5 refers to site related requirements specifically set out in adopted planning policies. In terms of contributions towards wider transport improvements this is already covered within section 5.</p> <p>Each scheme will be considered and the relevant contributions sought. Each development will have cumulative impacts on the transport system.</p> <p>The charges for transport are based on an analysis of the latest TRICS trips data resulting in an average daily trip rate arising from specific development types. The trip rate cost is calculated by:</p> <ol style="list-style-type: none"> 1) Applying trip rates against an average figure of development per annum (based on an average over 10 years) to generate a pa trip rate of 12,045 trips.

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	<p>for private development to fund approximately 47% of the annual £7.7 million cost. The SPD should provide evidence to justify that this is a reasonable proportion of the cost that is to be borne by developers It is also understood that to derive the £302, an expected build profile has been identified, which sets out how the combined contributions will meet the annual funding targets. The SPD should present the build profile along with the evidence which demonstrated that the assumptions used are reasonable</p> <p>Where proposed development replaces an existing facility or extant consented use, account should be taken of the trips that would no longer occur when establishing the level of contributions, i.e. the contribution per daily person trip should only apply to the net increase in trips.</p> <p>Para 5.15 sets out that developments need to make financial contributions for wider transport measures. This is in addition to site specific localised measures. There may be instances where the site specific localised improvements also relate to or contribute towards the LTP schedule of works. In such instances, in order to avoid double counting it is considered that there should be a discount to reflect the element that is already being provided by the development.</p> <p>Table 1 is different to Table 4, where the contributions towards open space provision differ.</p>	<p>2) A total cost of schemes is £7.7 million pa, which is the intended LTP programme of deliverable schemes for the next 2 years (as this document is intended as an interim version, with a very limited lifespan, this was considered to be a reasonable approach), and Inspectors have accepted this amount when the Council has justified contribution amounts. Based on historic patterns of transport funding an estimated 47% of the total £7.7m is set against the number of trips generated by new development (£3,634,000). The remainder will be provided through public funding. This equates to an average trip rate cost of £302, i.e. £3,634,000 divided by 12045 (trips). This is a reduction on the rate identified in the 2004 S106 SPG to reflect the change in trip rates for specific types of development. Future LTP Programmes are likely to involve schemes involving similar levels of costs and public funding.</p> <p>Yes, the contribution is for the net increase in trips. Additional wording will be added to clarify this.</p> <p>The specifics of each scheme will be taken into account when considering the relevant obligations.</p> <p>It is unclear what is considered to be different. Table 1 is intended as a summary. For some of the uses in Table 4 there is no specific figure included. Table 1 therefore identifies a 'from' figure.</p> <p>This is about open space policy not contributions.</p>

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	<p>The S106 states that when negotiating new s106 agreements, new standards based on local provision standards will be sought as the minimum provision as part of new developments. The Open Spaces Strategy does not give quantity standards of open space provision, only the expected minimum sizes of different typologies and minimum radial catchment distances. There is no guidance in the S106 SPD to suggest the quantity of open space expected from a proposed development of a given size. There is no indication what size a proposed development needs to be to trigger the provision of a 60ha borough park or a 20ha district park. Policy DM16 of the SDPD provides no further guidance on quantities of open space provision either. In the Open Spaces Strategy the Council uses the National Playing Field Association (now Fields in Trust - FiT) guidelines for play provision and summarises the minimum sizes for different facility's activity zones and the minimum radial distances. However, the FiT benchmark quality standard is omitted. Developers could assume that the FiT standard [0.8ha/1000 population for outdoor play space] would be acceptable to the Council' this is not confirmed in the SPD. It is worth noting that if the minimum size of LEAP specified in table 7.1 of the OISS is provided to FiT standards then the size of development would need to be over 167 units.</p> <p>Para 6.11 of the SPD states that total open space in the Borough is less than national guidelines recommend. In Section 4.3 of the OSS it states that the provision of green space is 2.9ha per 1000. The former NPFA 6 acre standard or 2.43ha/1000 population is exceeded and is not less than national guidelines.</p> <p>It is not confirmed that if a development is able to accommodate all its open space provision on site then no further off-site contributions will be sought. Is it expected that developers will provide all eight types of open space defined in paragraph 6.4 of the SPD? Will an additional off-site contribution be expected for cemeteries and churchyards?</p>	<p>The comment conflates the requirements of provision criteria in the Open Spaces Strategy (based on the guidelines in the former PPG17), and the requirements for S106 contributions as provided for in the T&CPA (1990) and Circular 05/2005. While these are related, the local provision standards in the OSS are denominated by average use; those set out in the SPD relate to the marginal increase in use created by the new development. Size is a factor, which is why the SPD relates the value of a planning obligation to the size of a new development (by sq.m and number of units), but borough and district parks are expected to be used by residents from all over the Borough, so a new large park could not be considered to be related in scale and kind to a new development. The creation of new neighbourhood parks may, however, be entirely appropriate in large new developments, and the Core Strategy provides guidelines on this.</p> <p>The 6 acre standard requires at least 4 acres/1000 population to be sports facilities. Reading is significantly underprovided for in terms of the typology of open space required in the former NPFA standards, so the two statements are entirely consistent. The point is that whether one uses national guidelines, or compares open-space provision with that of other local authorities, Reading has less than recommended and less than provided elsewhere.</p> <p>If a development provides sufficient new open space for its own residents, in a location accessible to its surrounding neighbourhood to encourage integration of the new residents as well as to provide a benefit to neighbouring residents, then we do not additionally require off-site contributions. Usually, however, developers squeeze on-site recreational development to the</p>

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	<p>Where the "...Council is prepared to adopt ..public open space, ...this will be subject to a...commuted sum. This payment should cover costs of maintenance in perpetuity (usually 50 years)." There are no examples of how a commuted sum may be calculated and whether contract prices and maintenance costs will be published on an annual basis. 50 year seems excessive in comparison with other Councils. Over a 50-year period, it is expected that play equipment will require replacement every 15 to 20 years, but there is no suggestion of this being included in the calculation of the commuted sum.</p> <p>There appear to be no auditable figures providing the background data as to how the contribution costs [from different development types towards open space provision] have been calculated or any justification for the figures set.</p> <p>Where proposed development replaces existing facilities (e.g. student accommodation become outdated and needs to be replaced), but there will be no overall increase in student numbers, then such development should not be expected to contribute to off-site open space.</p> <p>The student accommodation open space contribution is discounted compared to that payable from small dwellings on the basis that it will be occupied by single people rather than couples. It is clear that the SPD assumes that dwellings up to 75m2 may comprise 1& 2 bed dwellings and as such it is reasonable to assume that such occupation may be occupied by families. Student accommodation will not be occupied by couples or families. A discount of more than 50% should be applied for student accommodation.</p> <p>Para 6.23 suggests that 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. This fails to have regard to the facts that occupiers of student accommodation will not make use of all the types of open space listed in the way that a long term resident of the Borough might do. In the event that a contribution is justified it should be reduced.</p> <p>The campus comprises significant areas of open space for informal and formal sports use and is accessible for use by students. In respect of student</p>	<p>point of there being not really fit for purpose. In such instances, we require proportionate and relevant off-site contributions.</p> <p>The 50-year lifetime relates to the life of the new development and not the life of the play area, since the obligation is actually to provide facilities for the new residents. Irrespective of what other councils do, this is entirely reasonable.</p> <p>The basis of the calculation is the current cost to the Council of maintaining a play (or other recreational) space of the proposed size and complexity of equipment.</p> <p>Obligations apply to net increases in the number of dwelling units.</p> <p>Students generally make above-average use of local recreational facilities, and some student accommodation is occupied by couples or families. The 50% may be a rough discount, but it is probably fair on average, particularly since there is a further discount for students not being in residence all year.</p> <p>Students make above-average use of certain types of open space, which is funded by local residents, like the velodrome and ballcourts at Palmer Park, and the rights of way network. They are also free to use all types of free-to-use open space around Reading.</p> <p>The university campus is lovely and provides a wide variety of recreational activities for students. It remains a matter of fact that students</p>

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	<p>accommodation the rate of contribution towards open space should be reduced further on the basis that significant provision already exists. There may well be a justification for student accommodation making no contributions towards open space.</p> <p>It would be helpful to clarify that the provider of new schools is now normally another body [not the Local Authority].</p> <p>The wording at para 7.6 suggests that this [financing the gap in funding] is considered to provide justification for requiring contributions. Once again this has no regard to the CIL legal tests and is inappropriate. It would not be unreasonable to say that general financial pressures on the availability of DfE funding mean it is important that developments make appropriate provision for the additional needs they will create, perhaps as part of the introduction. The reference to pupil product of developments is welcome.</p> <p>“Schools in the area” is not defined. In some cases it may be appropriate to take a wider view if there is pupil movement between areas affecting the available capacity. In addition seeking a full contribution will only be appropriate of both primary and secondary schools are shown to have no capacity. In other circumstances a partial contribution may be appropriate. It would be helpful to provide a worked example that was less straightforward, or at least acknowledge that full contributions might not be justified in all cases.</p>	<p>nevertheless make significant use of local parks, sports facilities and rights of way.</p> <p>This will be clarified in Section 7.</p> <p>Previously there was a build cost for primary and a build cost for secondary. These nationally produced figures have not been updated for a number of years. Using BCIS data to try and update these, generated significantly higher figures than what is presented in the revised SPD. It was considered that a more modest increase would be appropriate. The basis of the revised figures is using a gap funding approach, i.e. after other funding sources have been taken into account, what level of costs would be required per place to be apportioned to developments, related to the number of children generated from them. This cost per place single figure is then applied to the pupil product ratio.</p> <p>Schools in the area would include those within the Borough, but if there is a significant impact on neighbouring Local Education Authority’s schools then a contribution might be sought on behalf of the neighbouring authorities.</p> <p>The relevant obligations will be sought and will relate to whether there are capacity issues at existing schools that the development will place pressure on. At present there are issues with capacity of both primary and secondary schools places and therefore new development will have an impact on both areas of provision, and therefore it is relevant that they should contribute to such.</p> <p>In terms of childcare facilities new development could bring pressures on childcare in an area</p>

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	<p>The statement that contributions will be sought from major employment generating development towards affordable childcare facilities is at odds with the Regulation 122 tests. Contributions should only be sought where it is necessary for the impact on such infrastructure to be mitigated. Furthermore there is no clarity as to how contributions towards affordable childcare will be calculated.</p> <p>The SPD states that contributions will be sought towards health provision and police service infrastructure and states that such contributions will be sought where there is a shortfall in other available funding sources. This gives rise to a number of concerns, including that it appears as though contributions may be utilised in order to remedy existing funding deficiencies. Planning contributions should not be utilised to substitute for funds which should be available through existing sources. Such an approach represents an additional tax on development and goes beyond the remit of seeking contributions. The SPD refers to other community infrastructure, however it provides no clarification as to what infrastructure this might comprise. No clarity is provided as to how the contributions towards such matters will be calculated.</p> <p>Although the SPD indicates that developers will be 'encouraged' to provide approximately 1% of the total construction costs to public art, the Council should note that should such a requirement be imposed then the Council will need to demonstrate how the requirements satisfies the legal tests.</p> <p>The contributions sought under paragraph 8.6 [Reading Central Area Infrastructure and Amenities and Environmental Enhancements outside of the Central Area] should only be required where the three tests are satisfied. At present the draft text suggests that all development located in areas where environmental improvements/ enhancements are programmed or which lie in the vicinity. It is not necessarily the case that all developments in such areas will need to make contributions towards these matters if the development is acceptable in planning terms. There is no clarity as to how the contributions will be calculated.</p> <p>The University supports the recognition at para 8.8 that all such contributions will</p>	<p>where there is a lack of such facilities. Contributions would be determined on a case by case basis relevant to the specifics of a scheme. This is supported in adopted policies - Core Strategy (CS13), and Sites and Detailed Policies Document (SDPD, DM3).</p> <p>For health and police infrastructure this is intended to be for those cases where development brings additional pressures over and above normal planned development, and in areas where there might already be pressures on such infrastructure provision.</p> <p>The existing SPG includes seeking planning obligations towards community facilities and is within policy DM3: Infrastructure. The type of facilities this will include will be included in the final version of the SPD. However, the details of any financial contribution that would be relevant would be based on the specifics of each case and therefore discussed and agreed at that time.</p> <p>Any contributions sought will be in accordance with meeting the relevant legal tests.</p> <p>Any contributions sought will be in accordance with meeting the relevant legal tests and relevant to make a development acceptable in planning terms. However, the details of any financial contribution that would be relevant would be based on the specifics of each case and therefore discussed and agreed at that time.</p> <p>Additional wording is included in other sections of the SPD to reiterate this point.</p>

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	<p>be considered on a site by site basis. However, it is also considered that such references should be included elsewhere in the SPD, as the wording of other sections imply that all developments will contribute towards the matters addressed by the SPD, regardless of the need for them to do so.</p>	
Deirdre Wells	<p>It would be extremely helpful if the precise definition of dwelling and commercial floorspace could be provided.</p> <p>It is unclear whether contributions are due where new Class C4 developments are proposed, or changes of use (those requiring planning permission) to specific forms of residential use, such as specialist housing, student accommodation, and houses converted to HMOs.</p> <p>Commercial floorspace is not a planning term, and again it would be useful if this could be defined in terms of use classes to avoid misunderstandings.</p> <p>The current document is not as clear as it needs to be. I doubt whether it makes giving advice on these areas straightforward for your DM planners.</p>	<p><u>Partially agreed. Proposed changes.</u></p> <p>The SPD is intended as guide and framework for S106 obligations and it would be very difficult to list each individual use class and those specific forms of development classed as sui generis, to which obligations might be applied to make a scheme acceptable in planning terms.</p> <p>For changes of use where there is an increase in the intensity of use might justify seeking S106 obligations (where of course the relevant legal tests are met). Additional wording will be added to the introduction.</p> <p>In terms of commercial floorspace this is commonly used to refer to any A or B use classes, however, each scheme needs to be considered and so there might be instances where developments not within these use classes would be required to provide obligations where these meet legal tests and make the scheme acceptable in planning terms.</p>

Annex B - List of Consultees

3	Ash Prajapati	British Sign And Graphics Association
Abbots Walk (Reading) Ltd	ATP Group Partnership	Britt Bjoro And Dave Long
Ability Housing Association	Aviva Life Pensions UK Ltd	Broadway Malyan
Abracad	Baljit Dhindsa	Broadway Malyan
Access Architects	Banner Homes	BT Open Reach
Adrian Collett	Barclays Bank Plc	Building Design
ADS	Barratt Thames Valley	Burghfield PC
AED Practice	Barton Willmore	C M Makin
Alan Barnes Consulting Engineers	Basingstoke and Deane	CAD Studio
Alex Hill	BDO Stoy Hayward LLP	CADRA
Alexandra Hemming	BDS Chartered Surveyors	Calum Macleod
Alison Bell	Beard Construction	Campbell Gordon
Alison Bond	Belinda Pearce	Canal and River Trust
Alison Stevens	Bell Cornwell Partnership	Carolyn Davidson
Alistair DeJoux	Bellway Homes	Carolyn Jenkins - Parks
Alistair Lloyd	Ben Burfoot - Sustainability	Carter & Son (Thatcham) Ltd
Alliance Environment and Planning	Ben Kirk	Catherine Place Properties
Alok Sharma MP	Ben Stanesby - Parks	Cathy Szklar
Amar Dave	Berkshire Archaeology	Caversham Globe
Andrew Case	Bewley Homes Plc	CBRE
Andrew Clifton And Annette McCartney	Blandy And Blandy	Cedarmart Ltd
Andrew Edwardson	Bluestone Planning Ltd	CEMEX
Andrew Tudor	Bob Reeves	CEMEX UK Ltd
Andy Baker	Bob Tarling	CgMs Consulting
Andy Meader	Boyer Planning Limited	Chair, Reading Chamber Of Commerce
ARD Architects	Boyes Turner	Chillingham Limited
Arqiva Limited	Bracknell Forest	Chris Aveyard
Art R Miller	Brian Westall	Chris Brett

Chris Saunders - Transport	Crest Nicholson Ltd	Councillor Jo Lovelock
Chris Thomas Ltd	Crossrail	Councillor John Ennis
Christian Dorin	CSJ Planning Consultants	Councillor Kelly Edwards
Christopher Marsh	Cumming Anderton Architects	Councillor Liz Terry
Clair Drever	D J Bailey	Councillor Marian Livingstone
Claire Weaver	D2 Planning	Councillor Mark Ralph
Colin Brench	Dalgleish And Co	Councillor Matt Rodda
Colin Dawson	Daniel Patrick Russell, Oxford Analytica	Councillor Melanie Eastwood
Colin Dodds	David And Gaylene Shepherd	Councillor Meri O'Connell
Consultant Public Health Reading	David Birkett Associates	Councillor Mike Orton
Councillor Andrew Cumpsty	David Breeze - Planning	Councillor Mohammed Ayub
Councillor Bet Tickner	David Cooksley	Councillor Paul Gittings
Councillor Chris Maskell	David Denham	Councillor Paul Woodward
Councillor Daisy Benson	David Farage	Councillor Pete Ruhemann
Councillor David Stevens	David Hall	Councillor Peter Jones
Councillor Daya Pal Singh	David Holtham	Councillor Rachel Eden
Councillor Deborah Edwards	David Leighton	Councillor Rebecca Rye
Councillor Ed Hopper	David Lock Associates	Councillor Richard Davies
Councillor Eileen McElligott	David Parsons	Councillor Richard Willis
Councillor Graeme Hoskin	David Syrad Architects	Councillor Ricky Duveen
Councillor Gul Khan	David Taylor	Councillor Rob White
Councillor Isobel Ballsdon	David Tingle	Councillor Rose Williams
Councillor James Anderson	David Watsham	Councillor Sandra Vickers
Councillor Jamie Whitham	Day Tanner Partnership	Councillor Sarah Hacker
Councillor Jan Gavin	Defence Estates	Councillor Timothy Harris
Councillor Jane Stanford-Beale	Denis King And Gillian King	Councillor Tom Stanway
Councillor Jeanette Skeats	Denton And Gibson Ltd	Councillor Tony Jones
Councillor Jenny Rynn	Dinesh Gohil	Councillor Tony Page

DPDS Consulting Group	Federation Of Small Businesses	Haslams
Dr Adrian Tompkins	First Great Western Trains	Head Teacher - Prospect School
Dr And Mrs Caithness	Firstplan	Health and Safety Executive
Dr Andrew Smith	Foster Wheeler	Heather Le Couteur
Dr Caroline Charles	FPD Savills	Heineken (UK) Ltd
Dr John Partington	Freshwater Group	Helen Pickering - Housing
Dr Kevin Blackburn	Friends of the Earth	Hermes
Dr Maria Pletnikova	Fusion Online Limited	Hicks Baker
Dr Marianne Field	G J Grashoff And A B Grashoff	Hicks Developments Ltd
Dr Neil Buchan	G Moffett	Highdown Avenue Management Association Limited
Drews Limited	Gillian Makin	Highways Agency
Drivers Jonas	Gladman Developments	Hives Planning
Drivers Jonas Deloitte	Globe - Lower Caversham - Mr Robert O'Neill	Holybrook PC
Drivers Jonas Deloitte	Globe - Newtown	Home Group
Drivers Jonas Deloitte	Globe - Newtown - Rob White	Horstonbridge Development Management Ltd
DTZ Pieda Consulting	Globe - Southcote	Howard Thomas
Dunster And Morton	Globe- Tilehurst - Jenny Cottee	Hugh Thomas
EA	Globe-Tilehurst - Liz Ellis	I Rivers
EA	Goodman	Iain Stevenson
Earley Town Council	Goodman International Ltd	Ian Golding
Edgington Spink And Hyne	Graham Beck	Ian Hunt Associates Ltd
Edwards Irish Partnership	Graham Biddle	Ian Lasseter
Emma Rawlinson	Graham Griffiths	Iceni Projects
English Heritage	Grosvenor Photography	IKEA Investment Properties Ltd
Evander Properties	GVA Grimley	Imperial Properties (Reading) Ltd
Eye and Dunsden PC	Hallam Land Management Ltd	Imperial Property Company Ltd
Farmglade Limited	Halson Mackley Partnership	Inchcape Estates Limited
Federation Of Small Businesses	Hampshire CC	ING Real Estate Investment Management

Isabel Burn	Kennet Properties Ltd	Mark Drukker
James Dredge	Kevin McDaniel - Education	Mark Groom
James Harris	Kidmore End Parish Council	Mark Leedale Planning
Januarys	King Sturge	Mark Thackeray
Jasmail Dhalay	King Sturge	Martin & Pole
Jean Atkins	King Sturge	Martin Bishop
Jeanne Harris	Lafarge A & C UK	Martin Clayton
Jeff Asemi	Lambert Smith Hampton	Martin Lloyd
Jeffrey Dobson	Lambert Smith Hampton	Mary And Richard Dixon
Jennifer Leach	Lambert Smith Hampton	Mary Cook
Joan And Graham Clark	Lancaster Plc/Bondco No 312	Mary Davis
John Dicks	Larrywatson58@hotmail.com	Michael Burgess
John Hall	LaSalle Investment Management	Mick Howlett
John Hayward	Lauren Cook	Miss Adrienne Duke
John Lewis Partnership	Leslie Jones	Miss Brigid O'Leary
John Sharkey & Co.	Leszek Humm-Gaska	Miss Charlotte Hopley
Jon Spires	Lind Gregory - Legal	Miss Davies
Jonathan And Gemma Matthews	Liz And Les Killick	Miss Elaine Cobb
Jones Lang LaSalle	Liz Norton	Miss Elonwy Rees
Jones Lang LaSalle	Lloyd Pople	Miss Emma Perry
K Phillips	Lloyd Turner	Miss Gillian Hopper
Kadambari Michaels	Lok 'n Store	Miss Jenna Polak
Kathleen Logue	Lorna Andrew And Jed Ellerby	Miss Marissa Tsoukas
Katie Dean	LSC?	Miss Nicola Crouch
Keen Partnership	Lynne Jones	Miss Rebecca Mashayekh
Keith Halson	Lynne Reynolds - Parks	Miss Sally Cross
Keith Richards	Mapeley (STEPS) Limited	Miss Tanya Rosenberg
Kempton Carr Croft	Mark And Betty Pargeter	Mohinder Chana

Mr & Mrs Sirisena	Mr D Browne	Mr Jonathan Fisher
Mr A.M Hooper	Mr Damian Bell	Mr Jonathan Sutton
Mr Alan Overton	Mr Darren Mulcahy	Mr Jose Marino
Mr Allen Sinclair	Mr David Earnshaw	Mr Julian Jones
Mr And Mrs A Murray	Mr David Farrell	Mr Kevin Griffiths
Mr And Mrs C Goslar	Mr David Patterson	Mr Leszek Luszowicz
Mr And Mrs C K Neo	Mr David Slade	Mr Logan Morris
Mr And Mrs C.R. And H.E. Hanshaw	Mr Derek Bertin	Mr Lumbroso
Mr And Mrs J Colbourn	Mr Derek Chapman	Mr Lyttle
Mr And Mrs M Gulliford	Mr Duncan Blease	Mr M Barrett
Mr And Mrs R Buzza	Mr Edward Hammond	Mr Magnus Smyly
Mr And Mrs S Watson	Mr FA Bisby	Mr Marc Weeks
Mr And Mrs Stone	Mr Fred Higgs	Mr Mark Roach
Mr And Mrs W Courtnage	Mr Gary Shukie	Mr Martin Wagner
Mr Andrew Black	Mr Gordan Ball	Mr Martyn Jones
Mr Andrew Clayfield	Mr Greg Farrell	Mr Matthew Pentland
Mr Andrew Somerville	Mr Hora Tevfik	Mr Michael Thomas
Mr Aston And Ms Wilshaw	Mr Howlett	Mr Michael Wellock
Mr B Garvie	Mr Huw Farmer	Mr Nick Clark
Mr Biddle	Mr Ian Fullbrook	Mr Nick Stone
Mr Brian Warren	Mr Ian Knock	Mr Nigel Armstead
Mr Chris Townsend	Mr Ian Seymour	Mr Paul Harrison
Mr Chris Voysey	Mr Jan Steele	Mr Paul Morris
Mr Chris Wood	Mr Jason Pyke	Mr Paul Raynsford
Mr CJ Harding	Mr Johannes Hersbach	Mr Peter Moran
Mr Colin Hatcher	Mr John Hendy	Mr Peter Woodbridge
Mr Colin Lee	Mr John Hoggett	Mr Phillip Gill
Mr Craig Anderson	Mr John Mould	Mr Rab Lee

Mr Richard Kenwood	Mrs G Irvine	Ms Nicola Suter
Mr Richard Riley	Mrs Gillian Wilson	Ms Ruth Perkins
Mr Rob Wilson MP	Mrs Heidi Anderson	Ms Sarah Waite
Mr Roger N Walton	Mrs Jenny Hicks	Ms Stella Clark
Mr Ronald Cutting	Mrs June Hardcastle	Ms Tanya Fenton
Mr Ross	Mrs Karen Close	Ms Taplin
Mr Ross Thomson	Mrs Linda McCauley	Ms Vickie Abel
Mr Russ Wood	Mrs Lis Howlett	Muhtasham Qureshi
Mr Sean Cullen	Mrs Robson	MUSE Developments
Mr Simon Walters	Mrs S Elston	Myles Milner - Education
Mr Spencer Rodd	Mrs Sarah Beale	Nathaniel Lichfield And Partners
Mr Stephen Barlow	Mrs Tina Barnes	National Grid
Mr Stuart Gould	Mrs V Munro	Natural England
Mr Sunil Fernandes	Ms Amanda Day	Network Rail
Mr Tim Byrne	Ms Baldock	Network Rail
Mr Tom Howell	Ms Beth Scott	Neville Turner
Mr Tom Winchester	Ms Caroline Anscombe	NHS Property Services
Mr Trevor Thomas	Ms Catherine Hutchison	Nicholas Blunt
Mr Vincent Hudson	Ms CP Lim	Nicholas Bundy
Mr W S G Macphee	Ms Fiona Loughlin	Nicky Simpson - Committee Services
Mr Wilkins	Ms Hitchcock And Mr Watts	Nicola Gooch
Mr Williams	Ms Isla Geddes	Nicola Taplin
Mrs Ann Rance	Ms J Manning Brown	Nigel And Helen Dodd
Mrs Cara Benda	Ms Jean Heward	Nigel Garrett
Mrs Carolyn Ribbons	Ms JM Langford	Nigel Horton-Baker - Transport
Mrs Christine Cliburn	Ms Karin Herbst	O2
Mrs Christine Cuthbertson	Ms Lynne Lemon	Oak Leaf Surveyors
Mrs Elaine Warwick	Ms Marie Percival	Office for Nuclear Regulation - Agency of HSE

Outdoor Media Centre	Professor Paul Bardos	Robert Rigby Architects
Owner/Occupier	Prospect Estate Agents	Robert Turley Associates
Owners Of Harveys Nurseries	Provision Planning	Roger Miles
Oxon CC	Prudential Plc	Romans
P J Planning	Prudential Portfolio Investment Managers	Ross Jarvis - Environmental Health
Pangbourne Beaver Investments	Purley-on-Thames Parish Council	Rowberry Morris
Paul Bonney	Quod	Roy Hood
Paul Hoddy	Radian	Royal Berkshire Fire and Rescue Service (Porta Planning)
Paul Masters	Raglan Housing Association	Royal Borough of Windsor and Maidenhead
Paul Semple	Rapleys	Royal Mail Group Limited
Peacock & Smith	Rapleys	Royal Mail Group Ltd
Pegasus Planning Group	Reading Chronicle	RPS
Perry Simons	Reading LETS	RPS
Pete Nicholson	Reading Transport	RPS
Peter Brett Associates	Reading Youth Cabinet	RPS Planning
Peter Brett Associates	Red Kite Development Consultancy	Ruth Leuillette - Transport
Peter J Vallance	Redlands Globe	S E Tucker And J Calcutt
Peter Webb	Redrow Homes Eastern Division	S J Walton
Philip Portch	RFTRA	Sackville Developments (Reading) Ltd
Phillip Shell	Richard Dodwell	SAKOMA
Pioneer Property Services	Richard Fenn	Samuel Kompfner
Pitmans	Richard Pike - Housing	Sara Batting Estate Agents
Plan Ahead Drawing Services	Ridge and Partners	Sarah Gee - Housing
Planning Potential	RO Developments Ltd And Urban Switch Ltd	Sarah Hayter
Planning Potential Ltd	Robert Banham	Sarah Judge
Planning Section	Robert Dimmick	Sarah Kopp
Police (RPS)	Robert Markus Gyselynck & Mya Davis	Savills
Professor Nigel Bell	Robert Norris	Savills

Savills	Steve Hicks - Valuation	Tim Cook
Savills	Steve Kendrick	T-Mobile
Scott Brownrigg	Steven Edwards	Tracey Essery
Scott Brownrigg	Steven Leitch	TRW Pensions Trust Ltd
Sean Sulley	Steven O'Grady	UBS Global Asset Management (UK) Ltd
Sehmi Builders Merchants	Stewart Ross Associates	Universities Superannuation Scheme Limited
Setsquare Solutions	Stuart Norris	University Of Reading
Shinfield Parish Council	Stuart Walker	University Of Reading
Shurgard Self-Storage	Sue Brackley - Transport	V Barker
Sia Israel	Sunil Mehan	Vail Williams LLP
Sikandar Ali	Susan Knight	Vodafone
Singleton Architects	TA Fisher	Washbourne Greenwood Development Planning
Skandia Property Fund	Thames Valley Chamber of Commerce	Waterman Group
Slough	Thames Valley Chamber Of Commerce	West Berkshire
Sonning Parish Council	Thames Valley HA	West Berkshire
South Oxfordshire	Thames Valley University	Westbuild Homes Limited
Southern Gas Networks	Thames Water (Savills)	Wharf Land Investments Ltd
Southern Housing Group	Thames Water Property Services Ltd	White Young Green
Spen Hill Developments	The Coal Authority	White Young Green Planning
Sport England	The JTS Partnership LLP	William Barrett
SSE Power Distribution	The Laurel Dawn Property Trading Partnership	William Graham
St James Group Ltd	The Licensed Trade Charity	Wimpey Homes
Standard Life Investments	The Ramblers Association - Berkshire Area	Wm Morrison Supermarkets Plc
Stephen Bowley Planning Consultancy	The Theatres Trust	Wokingham
Stephen Quayle - Legal	Thomas Homes	Woodley Town Council
Stephen Tait	Tilehurst Parish Council	Woolf Bond Planning
Steve Atkinson	Tilehurst Poor's Land Charity	Worton Grange Industrial Ltd
Steve Biddle	Tim Abram	Zoe Lewis