

To: Councillor Brock (Chair)
Councillors Page, Duveen, Emberson,
Ennis, Hoskin, James, Jones, Pearce,
Robinson, Rowland, Skeats, Stevens, Terry,
Warman and White

Direct: ☎ 0118 9372303

31 May 2019

Your contact is: **Simon Hill - Committee Services (simon.hill@reading.gov.uk)**

NOTICE OF MEETING - POLICY COMMITTEE 10 JUNE 2019

A meeting of the Policy Committee will be held on Monday, 10 June 2019 at 6.30 pm in the Council Chamber, Civic Offices, Reading, RG1 2LU. The Agenda for the meeting is set out below.

ITEMS FOR CONSIDERATION IN CLOSED SESSION

1. EXCLUSION OF THE PRESS AND PUBLIC

The following motion will be moved by the Chair:

“That, pursuant to Section 100A of the Local Government Act 1972 (as amended) members of the press and public be excluded during consideration of the following items on the agenda, as it is likely that there would be disclosure of exempt information as defined in the relevant Paragraphs of Part 1 of Schedule 12A (as amended) of that Act”

2. DECLARATIONS OF INTEREST FOR CLOSED SESSION ITEMS

3. COMMERCIAL INVESTMENT STRATEGY

**BOROUGH
WIDE 5 - 22**

Councillor Brock / Director of Economic Growth and
Neighbourhood Services

ITEMS FOR CONSIDERATION IN PUBLIC SESSION

4. CHAIR'S ANNOUNCEMENTS

5. DECLARATIONS OF INTEREST

CIVIC OFFICES EMERGENCY EVACUATION: If an alarm sounds, leave by the nearest fire exit quickly and calmly and assemble on the corner of Bridge Street and Fobney Street. You will be advised when it is safe to re-enter the building.

6.	MINUTES		23 - 38
	To confirm the Minutes of the Policy Committee meetings held on 26 March, 8 April and 22 May 2019.		
7.	PETITIONS AND QUESTIONS		
	To receive any petitions from the public and any questions from the public and Councillors.		
8.	DECISION BOOK REFERENCES		
9.	MAIN MODIFICATIONS TO THE LOCAL PLAN	BOROUGH WIDE	39 - 140
	Councillor Page / Director of Economic Growth and Neighbourhood Services		
	This report sets out the main modifications to the Local Plan and Proposals Map suggested by the independent Planning Inspector, and seeks approval to publish those main modifications for public consultation.		
10.	PROJECT FUNDING AWARD - THAMES VALLEY BERKSHIRE LIVE LABS	BOROUGH WIDE	141 - 148
	Councillor Page / Director of Economic Growth and Neighbourhood Services		
	This report informs the Committee of a £4.75m grant award from the Department of Transport for Thames Valley Berkshire Live Labs project, a technological trial to help futureproof roads and transport, and seeks approval to spend the grant in accordance with the project objectives.		
	An updated version of this report was published on 4 June 2019.		
11.	COMMERCIAL INVESTMENT STRATEGY	BOROUGH WIDE	149 - 160
	Councillor Brock / Director of Economic Growth and Neighbourhood Services		
	This report seeks approval to adopt the Commercial Investment Strategy as part of the overall Treasury Strategy. The full strategy is on the agenda as a closed session item as some elements remain commercially sensitive.		
12.	REVALUATION DISCRETIONARY BUSINESS RATES RELIEF SCHEME / RETAIL RELIEF AND DISCRETIONARY RELIEF 2019/20	BOROUGH WIDE	161 - 172

Councillor Brock / Director of Resources

This report gives an update on Business Rates Reliefs awarded in 2017/18 and 2018/19 and details of the proposed Local Revaluation Discretionary Relief Scheme for 2019/20. It also provides information regarding the change to retail relief for businesses with rateable values below £51,000 and advises no change to the Council's Discretionary Relief Scheme for 2019/20.

13. OUTSIDE BODY APPOINTMENTS

**BOROUGH
WIDE**

**173 -
174**

Councillor Brock / Monitoring Officer

This report asks the Policy Committee to make appointments or nominations to outside bodies for the Municipal Year 2019/20, or longer where required.

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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- Present:** Councillor Page (Vice-Chair in the Chair);
Councillors Brock, Hoskin, James, Jones, Skeats, Stevens, Terry, Vickers and Warman
- Apologies:** Councillors Lovelock (Chair), Ennis, Hacker, O'Connell, Pearce and White

RESOLVED ITEMS

76. EXCLUSION OF THE 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 item 78 below as it was likely that there would be a disclosure of exempt information as defined in the relevant paragraphs specified in Part 1 of Schedule 12A to that Act.

77. DECLARATIONS OF INTEREST FOR CLOSED SESSION ITEM

Councillors Ennis, Hacker and Lovelock had previously declared pecuniary interests in item 78 - 'Homes for Reading', and as a result did not attend the meeting. Nature of interest: the Councillors were Directors of Homes for Reading Limited.

78. HOMES FOR READING

Peter Sloman, Chief Executive, submitted a report summarising the latest review of the Council's funding of Homes for Reading Limited (HfR), which contained options on the current choices for the Council, in its capacity as the sole shareholder. The report stated that since its incorporation, HfR had acquired just over 100 properties, during which time HfR's financial performance had not met expectations due to the set up costs being passed to the company and changes to debt repayment obligations (MRP). The report set out three options and recommended option 2 as the best way of protecting the Council's interests in the future. A letter had been circulated to the Committee for consideration from the Chair of HfR Board, Sarah Hacker, commenting on the recommendations in the report, following discussion at the Board's meeting on 19 March 2019. In response to the letter the Chief Executive had circulated a further update report responding to the comments from the HfR Board. The update report concluded that the HfR Board's letter helpfully clarified a number of issues but did not raise any material factors impacting on the recommendations dealing with the equity/loan position.

The Chief Executive advised that due to the refinancing arrangements being recommended to Policy Committee, as the sole shareholder, the HfR Board would need to make a statutory declaration of solvency to the shareholder which would necessitate a further HfR Board meeting.

POLICY COMMITTEE MEETING MINUTES - 26 MARCH 2019

Resolved -

That the following be approved in principle, subject to the Policy Committee, as sole shareholder for Homes for Reading Limited (HfR), receiving and considering the requisite statutory declaration of solvency from the Directors of HfR:

- (1) That the refinancing of Homes for Reading Limited (HfR) as set out in Option 2 of the report, be approved and permitted;
- (2) That the Council's Section 151 Officer be authorised to make the necessary arrangements to implement the change described in (1) above with the precise interest rate and equity debt ratio being at her discretion balancing the need to ensure the Company was a going concern and the Council's costs were minimised;
- (3) That HfR be directed not to acquire any further properties;
- (4) That HfR be directed and permitted to approve a Service Level Agreement from April 2019, which would enable the Council to manage the company's properties, including housing management, letting and rent collection initially for a circa £100k annual charge and thereafter the Council's Chief Executive be authorised to approve a Service Level Agreement between the Council and the Company which would ensure all the legal obligations of the Company were met.

(Councillors Ennis, Hacker and Lovelock had declared pecuniary interests in this item and did not attend the meeting. Nature of interest: the Councillors were Directors of Homes for Reading Limited.)

(The meeting started at 8.05 pm and closed at 8.16 pm)

POLICY COMMITTEE MEETING MINUTES - 8 APRIL 2019

Present: Councillor Lovelock (Chair);
Councillors Page (Vice-Chair), Brock, Ennis, Hoskin, Jones, O'Connell, Pearce, Skeats, Stevens, Terry, Vickers, Warman and White

Apologies: Councillors Hacker and James

RESOLVED ITEMS

79. EXCLUSION OF THE 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 80-82 below as it was likely that there would be a disclosure of exempt information as defined in the relevant paragraphs specified in Part 1 of Schedule 12A to that Act.

80. DECLARATIONS OF INTEREST FOR CLOSED SESSION ITEMS

Councillors Ennis and Lovelock declared pecuniary interests in item 82 - 'Homes for Reading', left the meeting and took no part in the debate or decision. Nature of interest: the Councillors were Directors of Homes for Reading Limited.

81. CONTRACT TO PROVIDE A HOUSING REACTIVE REPAIRS SERVICE TO WOKINGHAM BOROUGH COUNCIL

The Director of Environment and Neighbourhood Services submitted a report seeking approval to enter into a contract to provide a Housing Reactive Repairs Service to Wokingham Borough Council (WBC).

The report explained that the Council's Housing Property Services had provided WBC with a Housing Repair and Maintenance service since 2011. The original agreement had expired on 31 March 2017 but the Council had continued to deliver the service under a Letter of Intent, pending the agreement of a new contract. The parties had now agreed the terms and conditions of the new contract, to cover the three year period from 31 March 2017, with the option for WBC to extend by three further years.

Resolved -

That the Director of Environment and Neighbourhood Services, in consultation with the Lead Councillor for Housing, the Head of Legal and Democratic Services and the Head of Finance, be authorised to enter retrospectively into the Response Housing Maintenance and Response Housing Engineering Maintenance Partnering Agreement with Wokingham Borough Council for a

POLICY COMMITTEE MEETING MINUTES - 8 APRIL 2019

period of three years, expiring on 31 March 2020 and with the option to extend by three further years.

(Exempt information as defined in Paragraph 3).

82. HOMES FOR READING

Further to Minute 78 of the meeting held on 26 March 2019, the Chief Executive submitted a report to the Committee, acting as sole shareholder for Homes for Reading (HfR), on the proposed re-financing of HfR. The report sought approval for a Special Resolution on the reduction of share capital, which had been approved and recommended to the shareholder by the HfR Board meeting on 2 April 2019, and set out a Solvency Statement signed by the directors of HfR, in the prescribed form and containing information set out in Section 643 of the Companies Act 2006. The following documents were attached to the report:

- Appendix A - Minutes of the HfR Board Meeting held on 2 April 2019
- Appendix B - Special Resolution on the reduction of share capital, approved at the HfR Board meeting on 2 April 2019 and recommended by the Board to the Policy Committee as shareholder;
- Appendix C - Solvency Statement, completed and signed by the Directors;
- Appendix D - report to the Policy Committee meeting held on 26 March 2019.

Resolved -

- (1) That the Minutes of the HfR Board meeting on 2 April 2019 be noted;
- (2) That the Solvency Statement signed by all Directors, as attached to the report at Appendix C, be received and noted;
- (3) That the Special Resolution proposing the reduction of share capital and the repayment of £7M of equity to the shareholder be passed in the following terms:

HOMES FOR READING LTD COMPANY NUMER 10108064 ("The Company")

1. REDUCTION OF NUMBER OF SHARES

THAT authorised share capital of the Company be reduced from 15,000,000 to 5,327,000 by cancelling and extinguishing 9,673,000 shares of £1 each in the Company and the amount by which the share capital is so reduced be repaid to the holder of those shares.

Called up share capital is currently paid and part paid as follows:

Allotted Shares		Allotted Shares after reduction of number

POLICY COMMITTEE MEETING MINUTES - 8 APRIL 2019

		of shares
12,300,000	Ordinary Shares Fully Paid	5,327,000
2,700,000	Ordinary Shares Part Paid at 1p each	0
15,000,000		5,327,000

2. REDUCTION OF AMOUNT PAID UP

THAT the issued share capital of the Company be reduced from £15,000,000 to £5,327,000 by cancelling and extinguishing capital to the extent of 9,673,000 fully and part paid up ordinary shares, and the amount by which the share capital is so reduced be repaid to the holder of those shares.”

Paid up share capital is currently paid and part paid as follows:

Current Allotted and Issued Shares		Current Paid up Share Capital	Paid up Share Capital after reduction of amount paid up
12,300,000	Ordinary Shares Fully Paid	£12,300,000	£5,327,000
2,700,000	Ordinary Shares Part Paid at 1p each	£27,000	£0
15,000,000		£12,327,000	£5,327,000

Reduction in amount paid up (share capital repaid to Shareholder)

£7,000,000

- (3) That the decision to approve and permit the re-financing of HfR in the 2018/19 financial year, as set out in Option 2 in the report to the meeting held on 26 March 2019, be confirmed;**
- (4) That the Director of Resources and the Assistant Director of Legal and Democratic Services be authorised to make alterations to the equity split in future, if it was in the interest of the Council, and to take any other necessary steps to implement the re-financing of HfR.**

(Councillors Ennis and Lovelock declared pecuniary interests in this item, left the meeting and took no part in the debate or decision. Nature of interest: the Councillors were Directors of Homes for Reading Limited. Councillor Page took the Chair for this item).

(Exempt information as defined in Paragraph 3).

83. MINUTES

The Minutes of the meeting held on 11 March 2019 were agreed as a correct record and signed by the Chair.

84. QUESTIONS

Questions on the following matters were submitted by members of the public:

POLICY COMMITTEE MEETING MINUTES - 8 APRIL 2019

	<u>Questioner</u>	<u>Subject</u>	<u>Reply</u>
1.	Simon Smart	Concessionary Bus Travel	Cllr Page
2.	Ayo Sokale	Brexit	Cllr Lovelock

Questions on the following matters were submitted by Councillors:

	<u>Questioner</u>	<u>Subject</u>	<u>Reply</u>
1.	Cllr White	Fly tipping in East Reading	Cllr James

(The full text of the questions and responses was made available on the Reading Borough Council website).

85. PUBLIC HEALTH BUDGET CONSULTATION 2018

Further to Minute 43 of the meeting held on 29 October 2018, the Director of Adult Care and Health Services submitted a report summarising feedback gathered through a two-month consultation to identify issues of interest and concern to residents relating to the Council's Public Health responsibilities. The feedback had been taken into account in the development of plans for the use of Public Health Grant in 2019-20 (Minute 86 below refers) and the overall Council budget proposals, as agreed by full Council on 26 February 2019 (Minute 45 refers).

The report set out the consultation approach and a demographic analysis of the responders. Feedback from the consultation was summarised under the following areas:

- Support for physical activity and healthy weight
- Mental wellbeing
- Information, advice and guidance
- Smoking, drugs and alcohol
- Supporting child health
- Vulnerable groups
- Transport
- Housing
- Feedback on service quality, areas for improvement and gaps
- Next steps for healthy lifestyle support

Resolved -

That the public feedback on the Council's Public Health responsibilities, in particular the priorities and concerns highlighted by local residents, and the plans for further public engagement on these issues, be noted.

86. PUBLIC HEALTH BUDGET 2019-2021

POLICY COMMITTEE MEETING MINUTES - 8 APRIL 2019

The Director of Adult Care and Health Services submitted a report setting out the Public Health budget for 2019/20, 2020/21 and 2021/22 including the required re-profiling of the budget. The following documents were attached to the report:

- Appendix 1: Public Health Performance & prevalence data for services subject to budget change in 2018-19
- Appendix 2: Equality Impact Assessment

The report explained that, in response to partner and public feedback from the Public Health Budget consultation on the importance of support to prevent or reduce ill health (Minute 85 above refers), budget proposals had been prepared for 2019/20 through to 2021/22 which largely maintained the Council's level of expenditure on these services, but re-profiled the budget to ensure financial sustainability. The proposed Public Health Grant budget for 2019-20 reflected a 2.6% reduction in the central government grant.

The report stated that Public Health commissioners had worked with providers to explore in-year and future options whilst working within contractual constraints. This had resulted in some positive negotiations with providers in identifying ways to address the risks associated with funding reductions, and continued service delivery in areas of priority for Reading.

Resolved -

That the proposed use of the Public Health grant in meeting Public Health outcomes by the local authority from 2019/20 to 2021/22 be agreed.

87. REPLACEMENT OF WATER STORAGE, MAINS WATER SUPPLIES AND DISTRIBUTION PIPEWORK TO COLEY HIGH RISE TOWER BLOCKS AND INSTALLATION OF SPRINKLER FIRE SUPPRESSION SYSTEM

Further to Minute 69 of the meeting held on 19 February 2018, the Director of Environment and Neighbourhood Services submitted a report seeking approval to award a contract as part of the project to replace the existing water storage facility, water supply mains and distribution pipework at the Coley High Rise Flats in Wensley Road, incorporating the installation of a new fire suppression sprinkler system to each block of flats. The report also sought approval for a revised allocation of capital expenditure to the works.

The report explained that a full design, specification and schedule of works documents had been carried out and planning approval obtained. A procurement exercise had been undertaken using the Fusion21 Framework, which was specific to the type of works which the Council wished to carry out and gave direct access to pre-approved specialist contractors. Unfortunately only one tender return had been received, from United Living, in the sum of £3,354,375. Following the Grenfell Tower fire there had been a continued growth in demand for this type of large volume works, and contractors had a shortage of available resources to tender and undertake works. There had consequently been an increase in the expected costs of the new water storage facilities and the sprinkler installations and various associated works from specialist nominated suppliers.

The report explained that a retendering exercise via the framework could be undertaken, but that it was unlikely that a better response or cheaper tender would be received, and given the urgent nature of the works it was not an option to wait and see if the market would rebalance at a future date. Where only one or limited tender responses had been received the framework agreement allowed for a post tender value engineering process, and the tenderer had indicated that they would be open to this process, for which there would be no cost to the Council.

The report therefore sought authority to enter into a value engineering exercise with United Living and, subsequently, to award the contract for the works. A reduction in spend would be sought without compromising the effectiveness of the systems, but spend approval was sought up to the full tender sum. Works on site were expected to commence in June 2019 and the contractors had proposed a reduced contract period to complete the work within 12 months.

Resolved -

- (1) That the Head of Housing and Neighbourhood Services, in consultation with the Lead Councillor for Housing, be authorised to enter into a negotiation and value engineering exercise for the works as tendered and award the contract for the replacement of water storage, mains water supply and distribution pipework and the installation of fire suppression sprinkler systems at flats at Coley High Rise, Wensley Road;
- (2) That a revised capital expenditure of up to £3.35m in the Housing Revenue Account across the financial years 2019/20 and 2020/21 be approved.

88. FINANCIAL ASSISTANCE FOR RESIDENTIAL LEASEHOLDERS

The Director of Environment and Neighbourhood Services submitted a report seeking approval to establish a framework for financial assistance options to be offered to Council residential leaseholders, with regards to major works undertaken by the Council in relation to fire safety.

The report noted that the Council retained legal ownership of a large number of leasehold dwellings previously sold under the Right to Buy scheme (RTB) and consequently retained obligations to provide, maintain, refurbish and improve shared communal services and facilities and the structure and exterior of blocks of leasehold flats. Leaseholders had a responsibility under the terms of their leases to pay a proportion of those costs via annual service charges, and in cases of major works the charge could be considerable. Currently there were 215 leaseholders in Council flatted blocks in total and eight in the Coley High Rise blocks; the number would continue to increase as properties were sold under RTB.

The general provisions for the recovery of service charges and major works liabilities were set out in the respective leases of individual leaseholders and the Council could,

under the terms of most of its leases, also collect an annual payment towards a sinking fund, so that where the charges might be considerable, a sum had already been set aside to minimise the cost to the leaseholders.

The report explained that the Council could assist leaseholders to meet their repayment obligations through a statutory right to a loan for leaseholders. There were also additional discretionary powers available under the Social Landlords Discretionary Reduction of Service Charges (England) Directions 2014 (the Directions) to assist leaseholders facing large bills, including providing a range of repayment and loan options to leaseholders, the ability to purchase equity shares and offer equity loans, and, on application and in exceptional circumstances, to waive or reduce the service charge by an amount the Council considered to be reasonable. The Directions set out criteria which should be considered by the Council and factors to consider relating to exceptional hardship.

The report proposed that the Council adopt the Directions to provide additional options for financial assistance to leaseholders facing large bills for major works in relation to the current fire safety programme and replacement cladding. It summarised the criteria for leaseholders to qualify for assistance and the repayment options that would be offered, which were: a loan with a variable interest rate as set under the statutory scheme; an interest free loan over 36 months, provided payments were made by direct debit; a five year payment plan with 36 months interest free and 24 months at interest as set under the statutory scheme, provided payments were made by direct debit; and a Legal Charge entered into by the leaseholder and registered against the title of the property, with the Council's outstanding sum to be recovered when the property was subsequently sold. It was also proposed to adopt the process for dealing with exceptional hardship as set out in the Directions.

Resolved -

- (1) That the Financial Assistance Guidelines outlined in section 4.2 of the report, which set out the repayment options which may be offered to leaseholders being charged for major works undertaken by the Council on residential blocks of flats in relation to its fire safety and replacement cladding programme, be approved;**
- (2) That, where leaseholders were unable to pay a major works invoice for works relating to the fire safety and cladding programme in full within 28 days of receipt, they be entitled to apply for assistance under the Financial Assistance Guidelines, and that applications be assessed based on the qualifying eligibility criteria as set out in the report;**
- (3) That the Head of Finance and the Head of Housing and Neighbourhood Services be authorised to operate the Financial Assistance Guidelines and the assessment process;**
- (4) That the Council adopt the process for dealing with exceptional hardship as set out in The Social Landlord's Discretionary Reduction of Service**

Charges (England) Directions 2014 outlined within paragraph 4.2.1 of the report.

89. BRIGHTER FUTURES FOR CHILDREN BUSINESS PLAN 2019-2021

The Director of Resources submitted a report to the Committee, in its capacity as sole member for Brighter Futures for Children Limited (BFfC/the company), seeking approval for the company's Business Plan for 2019-2021. The report also provided an overview of the arrangements provided for within the contract with BFfC for monitoring Children's Services, and the progress with setting up these arrangements and contract implementation. The following documents were attached to the report:

- Appendix 1 - BFfC Business Plan 2019-2021
- Appendix 2 - Current Contract KPIs
- Appendix 3 - RBC/BFfC Contract Management Group Terms of Reference

The report noted that at the meeting of full Council on 16 October 2018 (Minute 29 refers), it had been agreed to transfer the delivery of the Council's children's services to a newly established, wholly owned subsidiary Company of the Council, Brighter Futures for Children Limited (BFfC). The Service Delivery Contract and other relevant arrangements had been finalised to allow the transfer of Children's Services (excluding Fostering) to BFfC on 1 December 2018, with Fostering subsequently transferred on 1 March 2019 following BFfC's successful registration with Ofsted.

The report explained that the Council had 100% ownership of BFfC, which was run by a senior management team reporting to the Company board of directors. In turn the Board reported to the Council, with Policy Committee acting as the sole member/owner. Under the Company's Articles of Association, the adoption of the Business Plan was a 'reserved matter' that required the approval of the Council. The Company's proposed Business Plan for 2019-2021 was therefore attached for approval at Appendix 1. The report noted that the finances and Contract Sum were in line with the Medium Term Financial Strategy which had been agreed by Council on 26 February 2019 (Minute 45 refers).

The report summarised the agreed contract monitoring and governance framework, which included an annual performance report and an annual report on the Company's business plan to Policy Committee, and reports to the Adult Social Care, Children's Services and Education Committee. There was also monthly performance monitoring of Children's Services service delivery through the Children's Services Improvement Board, monthly financial monitoring through the contract management function, and bi-monthly Contract Management Group meetings to review the overall BFfC contract performance and the performance of support services provided to BFfC by the Council. The Contract Management Group Terms of Reference were attached to the report at Appendix 3, and the report summarised the procedure and timescale for financial and performance reporting to the Group.

The report explained that, underpinning the contract monitoring and governance arrangements was a set of contract Key Performance Indicators, which was attached to the report at Appendix 2. The drafting of the Service Delivery Contract reflected the

POLICY COMMITTEE MEETING MINUTES - 8 APRIL 2019

intention for the current contract KPIs to be reviewed, to ensure that they were meaningful and appropriately aligned to the desired service outcomes, and the report therefore proposed that the Company's Managing Director and Council's Chief Executive be authorised to finalise the contract KPIs.

The report further explained that the set-up of BFfC had been undertaken on the basis that the Company would 'buy back' the majority of support functions from the Council for a minimum of two years from 1 April 2019. An over-arching Managed Services Agreement acted as an umbrella contract for the individual Service Level Agreements between the Company and the Council, which were listed in the report. The report also summarised a number of matters still to be finalised and/or implemented, including property leases and FM SLAs, novation of relevant third party supplier contracts from RBC to the Company, and agreement of an exit plan.

Resolved -

- (1) That the BFfC Contract governance arrangements and progress with their implementation be noted;**
- (2) That the BFfC Business Plan for 2019-2021 be agreed;**
- (3) That the Managing Director of Brighter Futures for Children and the Council's Chief Executive, in consultation with the Lead Councillors for Children and Education be authorised to finalise the revised contract KPIs.**

(The meeting started at 6.30 pm and closed at 7.55 pm)

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POLICY COMMITTEE MINUTES - 22 MAY 2019

- Present:** Councillor Brock (Chair)
Councillors Duveen, Emberson, Ennis, Hoskin, James, Jones, Page, Pearce, Robinson, Rowland, Stevens, Terry, Warman and White.
- Apologies:** Councillor Skeats.

RESOLVED ITEMS

1. ESTABLISH A MAPLEDURHAM PLAYING FIELDS TRUSTEES SUB-COMMITTEE, APPOINT THE CHAIR AND MEMBERS AND AGREE TERMS OF REFERENCE

Resolved:

- (1) That, under the provisions of Sections 101 and 102 of the Local Government Act 1972, The Heights Free School Sub-Committee be established for the Municipal Year 2019/20 and the following Councillors be appointed to serve on the Sub-Committee:

The Mapledurham Playing Fields Trustees Sub-Committee (5:2)

Labour Councillors

Ayub
Edwards
Emberson
Gittings
James

Conservative Councillors

Warman
To be confirmed

- (2) That the following Councillors be appointed as Chair/Vice-Chair of The Mapledurham Playing Fields Trustees Sub-Committee for the Municipal Year 2019/20:

Chair

Councillor Edwards

Vice-Chair

Councillor Ayub

- (3) That the Terms of Reference of the Sub-Committees be as set out in Appendix B to the Monitoring Officer's report to Council of 22 May 2019.
- (4) That the following appointments (or nominations, where indicated) be made for the Municipal Year 2019-20:

- (a) Berkshire Local Transport Body

1 Representative
Standing Deputy

Councillor Page
Councillor Debs Absolom

- (b) Bus Lane Adjudication Service Joint Committee & Parking and Traffic Regulations Outside London Adjudication Joint Committee

POLICY COMMITTEE MINUTES - 22 MAY 2019

- | | |
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| 1 Representative
Standing Deputy | Councillor Page
Councillor Debs Absolom |
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- (c) Improvement and Efficiency South-East (Nomination)
- | | |
|--------------------|------------------------------|
| Director | Deputy Leader of the Council |
| AGM Representative | Leader of the Council |
- (d) Joint Waste Disposal Board
- | | |
|-------------------|-------------------------------------|
| 2 Representatives | Councillor James
Councillor Page |
|-------------------|-------------------------------------|
- (e) Local Enterprise Partnership (Nomination)
- | | |
|------------------|------------------------------|
| 1 Representative | Deputy Leader of the Council |
|------------------|------------------------------|
- (f) Local Government Association
- | | |
|--|---------------------------|
| General Assembly
(1 Representative) | Councillor Page |
| Annual Conference and Exhibition | Councillor Brock and Page |
- (g) Mid and West Berkshire Local Access Forum (Nomination)
- | | |
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| 1 Representative | Councillor Rowland |
|------------------|--------------------|
- (h) Reading Climate Change Partnership
- | | |
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| 2 Representatives | Councillor Page
Sustainability Manager |
|-------------------|---|
- (i) Reading UK Community Interest Company Board
- | | |
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| 2 Representatives | Leader of the Council
Chief Executive |
|-------------------|--|
- (j) Royal Berkshire Fire Authority
- | | |
|-------------------|---|
| 3 Representatives | Councillor Gittings
Councillor Lovelock
Councillor Stanford-Beale |
|-------------------|---|
- (Subject to confirmation pending discussions with the other Berkshire local authorities over the membership requirements).

POLICY COMMITTEE MINUTES - 22 MAY 2019

(k) South East England Councils

1 Representative	Councillor Brock
1 Named Substitute	Councillor Page

(l) Thames Valley Police & Crime Panel

1 Representative	Councillor James
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(m) Trading Standards South-East Ltd

1 Representative	Trading Standards Manager
1 Named Substitute	Regulatory Services Manager

(n) Homes for Reading Ltd

Councillor Directors (3:1)	Councillor Ennis Councillor Hacker Councillor Lovelock
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READING BOROUGH COUNCIL

REPORT BY EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES

TO:	POLICY COMMITTEE		
DATE:	10 JUNE 2019		
TITLE:	MAIN MODIFICATIONS TO THE LOCAL PLAN		
LEAD COUNCILLOR:	COUNCILLOR PAGE	PORTFOLIO:	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT
SERVICE:	PLANNING	WARDS:	BOROUGHWIDE
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1. EXECUTIVE SUMMARY

- 1.1 The Council is replacing its existing development plans (the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document) with a new single Local Plan to set out how Reading will develop up to 2036. Three consultations have been undertaken on this Local Plan between 2016 and 2018. The Local Plan was submitted to the Secretary of State on 29th March 2018, which marked the beginning of a public examination held by an independent Planning Inspector, including public hearings in September and October 2018.
- 1.2 The Inspector has identified a number of main modifications that are needed to make sure that the plan is sound and legally compliant. These main modifications need to be subject to consultation, and a proposed consultation document is set out in Appendix 1, alongside a Sustainability Appraisal (Appendix 2) which assesses the environmental, social and economic effects of the modifications. The Inspector can then incorporate these main modifications in the final inspector's report.

2. RECOMMENDED ACTION

- 2.1 That Committee resolves to make a formal request to the Inspector that she recommend 'main modifications' to the Local Plan.
- 2.2 That the Main Modifications to the Local Plan and Proposals Map (Appendix 1) be approved.

2.3 That community involvement on the Main Modifications to the Local Plan and Proposals Map (Appendix 1), together with the accompanying Sustainability Appraisal (Appendix 2) be authorised.

3. POLICY CONTEXT

3.1 The Local Plan sets out the planning policies for an area and is the main consideration in deciding planning applications. The existing local plan for Reading, previously referred to as the Local Development Framework, currently consists of three documents - the Core Strategy (adopted 2008, amended 2015), Reading Central Area Action Plan (adopted 2009) and Sites and Detailed Policies Document (adopted 2012, amended 2015).

3.2 Various changes have meant the need to review the Local Plan. In particular, the publication of the National Planning Policy Framework (NPPF) in 2012 (amended again in 2018) meant significant changes, in particular the need for local planning authorities to identify their 'objectively assessed development needs' and provide for them. The need to review the local plan as a single, comprehensive document was identified in a Local Development Scheme, which is the programme for producing planning policy documents, the latest version of which was agreed by Strategic Environment, Planning and Transport Committee on 23rd November 2016 (Minute 15 refers).

4. THE PROPOSAL

(a) Current Position

4.1 The first stage of preparing the Local Plan was consultation on Issues and Options. An Issues and Options for the Local Plan document was approved by Strategic Environment, Planning and Transport Committee on 24th November 2015 (Minute 22 refers), and consultation was carried out between January and March 2016. The second stage was production of a full Draft Local Plan and Proposals Map for consultation. The Drafts were approved by Strategic Environment, Planning and Transport Committee on 4th April 2017 (Minute 26 refers), and consultation was carried out during May and June 2017. The third stage was a Pre-Submission Draft Local Plan and Proposals Map, which was approved by Strategic Environment, Planning and Transport Committee on 22nd November 2017 (Minute 14 refers), and consultation on which was carried out between November 2017 and January 2018.

4.2 After consultation on the Pre-Submission Draft Local Plan, the Council submitted the Local Plan to the Secretary of State on 29th March 2018. Submission of a Local Plan document marks the beginning of a public examination, during which an independent Inspector considers whether the plan is sound, legally compliant and fulfils the duty to co-operate. The Planning Inspector appointed to examine the Local Plan was Louise

Gibbons, who set the programme, procedure and main issues for the examination.

- 4.3 The main focus of the examination was a set of public hearings held between 25th September and 5th October 2018 in the Town Hall, in which Council officers and those invited to take part spoke to discuss the soundness and legal compliance of the plan. A report on the examination hearings, including additional information requested by the Inspector, was considered at Strategic Environment, Planning and Transport Committee on 21st November 2018 (Minute 23 refers).
- 4.4 The Inspector's final report will present her conclusions on the Local Plan in full. However, before that report can be produced, the Inspector has identified a list of instances where 'main modifications' are required. Main modifications are those changes that affect the direction or interpretation of policy, and therefore require an additional consultation stage. It is not surprising that main modifications have been identified, as they are now regularly required by Inspectors.
- 4.5 Most of these main modifications were identified during the hearings themselves, and officers have been in communication with the Inspector since the hearings about the wording required. However, in March 2019, the Inspector produced Post-Hearing Advice (available on the Council's website¹), which raised a number of more significant changes. These included the need for: changes to the housing numbers in policy H1; a further flexibility on density in policy H2; alterations to the build-to-rent policy H4; removal of reference to securing affordable housing from employment development (policy CC9/EM1); and changes to the Reading Golf Club allocation in CA1b. Most significantly, the Inspector considered that the evidence to support securing affordable housing contributions from developments of less than 10 dwellings in policy H3 was insufficient, and asked the Council to either provide further justification or remove this requirement.
- 4.6 The Council therefore produced additional evidence on affordable housing contributions from small sites showing that it is an important element of funding new affordable housing, and that it did not represent an unreasonable burden for developers. This was provided on 1st May, and is available on the Council's website². On 10th May, the Inspector responded to say that she was satisfied that the approach of seeking affordable housing contributions from small sites was justified, but that developers should provide a financial contribution rather than on-site homes on sites of 5-9 dwellings, and that there should be additional text to ensure that the administrative burden in demonstrating a viability case for a reduced contribution should be eased on smaller sites.

¹ http://www.reading.gov.uk/media/10054/EI014-Post-Hearing-Advice--Additional-Main-Modifications-and-Related-Matters/pdf/EI014_Post_Hearing_Advice_Note_March_2019.pdf

² http://www.reading.gov.uk/media/10188/EC043-Additional-Justification-on-Policy-H3-on-Small-Site-Affordable-Housing-May-2019/pdf/EC043_Additional_Justification_on_Policy_H3_on_Small_Site_Affordable_Housing_May_2019.pdf

4.7 Whilst the Inspector has identified the modifications that would be necessary to make the plan sound, she cannot consider such modifications unless the Council makes a formal request to recommend modifications. It is for the Council to consult on these modifications. Without these main modifications, the Inspector has clarified that the Local Plan will not be found 'sound' and/or legally compliant, and cannot be adopted.

4.8 A schedule of main modifications is included within the proposed consultation document in Appendix 1, including all modifications referred to in paragraphs 4.5 to 4.7. Many of these represent quite small changes to wording, but there are some more significant changes that are summarised below.

- Alterations to policy CC1 on the presumption in favour of sustainable development to bring it in line with the July 2018 version of the National Planning Policy Framework (MM1);
- Addition of wording in policy EN1 on the historic environment to reflect Historic England's view that there should be more specific reference to listed buildings and historic parks and gardens (MM6);
- Removal of the policy approach in CC9 and EM1 that seeks financial contributions towards affordable housing from major office developments. This has been part of the Council's policy for many years, but the Inspector considered it was not justified (MM5, MM15);
- Changes to the overall housing provision targets in policy H1 to take account of more recent information on completions, permissions and changes to site allocations, raising the annual housing target from 671 to 689, including consequential changes to the monitoring and implementation sections and the housing trajectory (MM17);
- Additional wording in policy H2 on density and mix to emphasise that the dwelling ranges included in the site allocations policies are not hard and fast limits, but are intended to be indicative (MM18);
- Changes to policy H3 on affordable housing to require off-site financial contributions for sites of 5-9 dwellings rather than on-site provision, and also to make clear that applicants for sites of less than 10 dwellings will have to submit more light-touch information to support viability arguments to reduce affordable housing contributions than applicants for larger sites (MM19);
- A reference in the supporting text to H3 to most up-to-date information on the needs for different affordable housing tenures (MM19);

- Changes to policy H4 on build-to-rent developments (a new type of development, the first of which at Napier Road is currently under construction) to ensure that the minimum term in which the development must be in single ownership is 20 rather than 30 years, and to also state that compliance with the Council's Rent with Confidence standards is voluntary (MM20);
- Various changes to the supporting text to policy H12 on student accommodation, in agreement with the University of Reading, to reflect the most up-to-date information on existing need for student accommodation (MM22, MM63, MM65);
- A change to policy RL3 on district and local centres, to set out how the approach of that policy, which hinges on controlling existing frontages, would be applied in a case where a centre was wholly or partly redeveloped (MM29);
- An uplift in the dwelling ranges specified for CR12b (Great Knollys Street and Weldale Street) and CR13c (Forbury Business Park and Kenavon Drive). In the case of CR12b, this simply reflects the planning permission at Weldale Street granted since the Local Plan was submitted. In the case of CR13c, the uplift better reflects what has been achieved on adjacent sites in Kenavon Drive (MM43 and MM47);
- Deletion of policy WR4, which identified a site at Cow Lane for traveller transit provision, which is a change requested by the Council in line with the decision not to proceed with this proposal, made by this committee on 11th June 2018 (MM57);
- A change to CA1a (Reading University Boat Club) to allow for the boat club to be retained as part of a development (MM58);
- Changes to CA1b (part of Reading Golf Club) to reflect a more flexible approach to how future golf provision of the remaining land would be secured, and to be clearer on requirements such as healthcare, vehicular access and parking (MM59); and
- Recognition within ER1c (land rear of 8-26 Redlands Road) that the northern part of the site, already in use as student accommodation, can continue to accommodate student accommodation or university uses (MM64).

4.9 At this stage, it appears likely that the Inspector will consider those elements of the Local Plan not covered by the main modifications to be sound. This includes a number of areas where the Council's policy is changing, including the new sustainability requirements such as the introduction of zero carbon homes. However, although not currently anticipated, an Inspector can, at any time before a final report is prepared, identify further main modifications, in which case an

additional period of consultation would need to be undertaken. It is also possible, although unlikely, that this could lead to limited additional hearings, or further information requests.

- 4.10 The Council has scope to make more minor changes to the Local Plan that do not affect soundness, without being recommended by the Inspector or undertaking consultation. These would be small updates, correction of errors or changes for the sake of consistency. These will be reflected in the final version of the Local Plan for adoption.
- 4.11 In addition to consultation, the main modifications also need to be subject to a Sustainability Appraisal to consider the environmental, social and economic impacts of the proposals. This is included as Appendix 2. A full Sustainability Appraisal of the Pre-Submission Draft Local Plan in November 2017 looked at all of the policies in the plan, and this addendum considers only whether the main modifications would have implications for the appraisal that has already been carried out. In the majority of cases, the very limited modifications would mean little change from the existing appraisal. This Sustainability Appraisal addendum also needs to be subject to consultation.
- 4.12 The consultation on main modifications will last for six weeks, and is planned to finish on Wednesday 24th July 2019. Following this, the consultation representations will be passed to the Inspector.
- 4.13 The following stage will be that the Inspector will produce a final report on the soundness and legal compliance of the Local Plan, incorporating the main modifications. If the plan is found sound and legally compliant, it can then proceed to adoption. If not, the Council will need to reconsider its approach, and prepare a new version. Discussions with the Inspector have indicated that a final report could be expected in September 2019, which, if found sound and legally compliant, would mean formal adoption at full Council in October.

(b) Option Proposed

- 4.14 Committee is recommended to accept the main modifications suggested by the Inspector and agree the detailed wording and proposals map changes set out in Appendix 1, and to publish those main modifications for a six-week period of consultation, alongside the Sustainability Appraisal in Appendix 2.

(c) Other Options Considered

- 4.15 There are two alternative options to the proposed option above. They are: (i) to not accept some or all of the identified main modifications to the Local Plan; and (ii) to suggest different or more wide-ranging modifications, beyond those required for soundness.
- 4.16 The result of option (i), to not request some or all of the identified main modifications to the Local Plan, would be that the Inspector would almost certainly find the plan unsound. This would mean that it could

not be adopted. In this case, the Council would need to either go back to the Pre-Submission stage, meaning needing to go through the consultation, submission and examination processes again, or to not proceed with the Local Plan in its current form at all.

- 4.17 This option is not considered appropriate, as it would result in reliance on policies in existing development plan documents that are, in some cases, out of date. This would include housing provision figures, which would mean that housing development proposals in Reading would need to be considered in the context of the ‘presumption in favour of sustainable development’ in national policy until a new Local Plan would be adopted. It would become extremely difficult to resist inappropriate development, and could result in planning by appeal. It would also mean that the opportunity to introduce new policy requirements on key matters such as sustainable design and construction would be lost.
- 4.18 A return to a Pre-Submission Local Plan would also have very significant resource implications, not just in terms of the time and cost of producing and examining the Local Plan itself, but also the need to undertake costly updates of key pieces of evidence.
- 4.19 Option (ii), to suggest different or more wide-ranging modifications would carry the significant risk of the Inspector needing to re-open the Examination. As well as the resource and time implications of more sitting days, it would also be far from guaranteed that different proposed modifications would be considered sound, and it could cause further delays to the process through, potentially, prompting additional main modifications from the Inspector or a finding of unsoundness. This would leave the Council without an up-to-date comprehensive policy framework for a potentially substantial period of time.

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 The Local Plan, through setting out the way Reading will develop to 2036, will contribute to the following priorities in the Corporate Plan 2018-21:
- Securing the economic success of Reading;
 - Improving access to decent housing to meet local needs;
 - Keeping Reading’s environment clean, green and safe;
 - Promoting great education, leisure and cultural opportunities for people in Reading.

6. COMMUNITY ENGAGEMENT AND INFORMATION

- 6.1 ‘Main modifications’ are those that would require additional consultation. A further six-week period of consultation is therefore required, which will be carried out in line with the Statement of Community Involvement (adopted March 2014), as for previous Local Plan consultations. The consultation would be focused on the main modifications only, not the remainder of the Local Plan. The consultation period is proposed to last from Wednesday 12th June to

Wednesday 24th July. As this is an extremely focussed consultation, no consultation events are planned.

7. EQUALITY ASSESSMENT

- 7.1 The Sustainability Appraisal of the Main Modifications for the Local Plan incorporates the requirement to carry out a screening stage of an Equality Impact Assessment. A full Sustainability Appraisal that examined the effects of each policy and development site within the plan was submitted alongside the Local Plan on 29th March 2018³, and the Sustainability Appraisal addendum attached at Appendix 2 deals only with the implications of the proposed modifications. Neither of these documents identified any significant adverse impacts on specific groups due to race, gender, disability, sexual orientation, age or religious belief.

8. LEGAL IMPLICATIONS

- 8.1 Local plans are produced under the Planning and Compulsory Purchase Act 2004. Under Section 20 (7C) of the Act, an Inspector can recommend main modifications, but only if requested to do so by the local authority. The process for producing local plans is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulations 23, 24 and 25 concern the process for examination of a Local Plan and publication of an Inspector's Report.

9 FINANCIAL IMPLICATIONS

- 9.1 Production of the Local Plan prior to examination stage has been carried out within existing planning budgets. The holding of an examination is a significant cost to the Council and the full scale of the cost will only become known once the Inspector's Report has been issued and the Planning Inspectorate provides an invoice. The costs associated with the proposed consultation on main modifications will be very limited, and will be met from existing budgets.

Value for Money (VFM)

- 9.2 The preparation of a local plan ensures 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 local plan, in line with legislation, national policy and best practice, therefore represents good value for money.

Risk Assessment

³ http://www.reading.gov.uk/media/8050/Sustainability-Appraisal-of-the-Presubmission-Local-Plan-1117/pdf/Sustainability_Appraisal_of_the_Presubmission_Local_Plan_1117.pdf

9.3 There are no direct financial risks associated with the report.

BACKGROUND PAPERS

- Planning and Compulsory Purchase Act 2004
- Localism Act 2011
- The Town and Country Planning (Local Planning) (England) Regulations 2012
- National Planning Policy Framework
- Local Development Scheme, November 2016
- Submission Draft Local Plan, March 2018
- Inspector's Post-Hearing Advice, March 2019
- Additional Justification on Policy H3 on Small Site Affordable Housing, May 2019
- A wide range of evidence on various matters available on www.reading.gov.uk/localplanexamination

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APPENDIX 1: MAIN MODIFICATIONS CONSULTATION DOCUMENT

READING BOROUGH LOCAL PLAN CONSULTATION ON MAIN MODIFICATIONS JUNE 2019

The Reading Borough Local Plan was submitted to the Secretary of State on 28th March 2018. The public hearings for the Examination took place between 25th September and 5th October 2018.

The Inspector's view, as articulated through the hearings and in subsequent written advice, is that, in order for the Local Plan to be considered 'sound', a number of modifications needed to be made. These modifications need to go through community involvement, as well as through the Sustainability Appraisal process. Such modifications are known as 'main modifications'.

As a result of this, the Council has therefore written to the Inspector to request that the main modifications contained in this document are made to the Local Plan.

This document asks for your views on the main modifications identified by the Inspector, as well as on the Sustainability Appraisal of those modifications (which is a separate document, available on the Council's website¹). Page and paragraph references in the table are to the Submission Local Plan, which is available on the Council's website², or in Reading Borough libraries and the Civic Offices. Please note that, at this stage, we are not accepting comments on any parts of the Local Plan other than the main modifications. Your comments on the main modifications will be provided to the Inspector for her consideration. It would be helpful if you could please refer to the modification reference when commenting.

Please note that the Council has also produced a schedule of more minor changes which do not alter the policy approach, and which it intends to make to the final version of the Local Plan. These do not require additional consultation or sustainability appraisal, but they are available for information on the Council's website³.

Please send comments to the Planning Policy Team on:
planningpolicy@reading.gov.uk
Civic Offices
Bridge Street
Reading
RG1 2LU

Please ensure that all comments are received by 5pm on **Wednesday 24th July 2019**.

¹ [Weblink to be added]

² http://www.reading.gov.uk/media/8649/LP001-Submission-Draft-Local-Plan/pdf/LP001_Submission_Draft_Local_Plan.pdf

³ [Weblink to be added]

Schedule of Main Modifications

The examples of modifications below are expressed either in the conventional form of striketrough for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the Submission Local Plan, and do not take account of the deletion or addition of text.

**Changes marked with an asterisk were already made to the Local Plan at Submission stage, but have been identified by the Inspector as requiring consultation at Main Modifications stage.*

***Changes marked with two asterisks were only partly already made to the Local Plan at Submission stage, and also incorporate further changes*

Ref	Page	Policy/ Paragraph	Main Modification	Reason
MM1	21	CC1	<p>“CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT</p> <p><i>A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (<u>NPPF</u>). Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</i></p> <p><i>Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Proposed development that conflicts with the development plan will be refused, unless other material considerations indicate otherwise.</i></p> <p><i>Where there are no policies relevant to the application or relevant the policies <u>which are most important to determining the application</u> are out of date at the</i></p>	Update to take account of 2018 National Planning Policy Framework as discussed in hearings on 26 th September

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p><i>time of making the decision then permission will be granted unless material considerations indicate otherwise - taking into account whether:</i></p> <ul style="list-style-type: none"> • <i><u>The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or</u></i> • <i><u>Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.</u></i> • <i>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</i> • <i>Specific policies in that Framework indicate that development should be restricted.</i> 	
MM2	22	4.1.5	<p>“Expectations for performance of new-build homes in terms of emissions are set out in policy H5 on housing standards. An existing Sustainable Design and Construction Supplementary Planning Document is in place, and the general principles, where in compliance with the overall policy, will continue to apply. An updated version of the SPD will be prepared-published in 2019 to supplement this policy <u>and will provide further detail on how developments will be expected to achieve the BREEAM ratings required by policy CC2.</u>”</p>	To provide further detail on the forthcoming Supplementary Planning Document, as discussed at hearings on 26 th September.
MM3	23	CC3 and 4.1.6	<p><i>“All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:</i></p> <ul style="list-style-type: none"> • <i><u>New-Wherever possible, new</u> buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;</i> • <i>Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas</i> 	To ensure policy is sufficiently flexible and to refer to the SPD in the explanatory text of policy CC3 as discussed at the hearings on 26 th September.

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p><i>exposed to direct sunlight, green and brown roofs, green walls, etc;</i></p> <ul style="list-style-type: none"> • <i>Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions; and</i> • <i>All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change</i> <p>4.1.6 Adaptation is about making sure future communities can live, work, rest and play in a comfortable and secure environment in the face of inevitable climate change. Taking action now to help successfully achieve adaptation measures would help to reduce vulnerability for people, businesses, services and infrastructure to climate change. Adaptation measures need to be built into all new developments to ensure the sustainable development of housing, businesses and the economy of Reading. Applicants should refer to the forthcoming Sustainable Design and Construction SPD for further guidance.”</p>	
MM4	24-25	CC4 and 4.1.12- 4.1.18	<p><i>“In meeting the sustainability requirements of this plan, developments of the sizes set out below shall demonstrate how consideration has been given to securing energy for the development from a decentralised energy source, including CHP.</i></p> <p><i>Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq m shall consider the inclusion of a CHP plant, or other form of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.</i></p> <p><i>Where there is existing decentralised energy provision, including a CHP plant or a district energy network present within the vicinity of an application site, further developments of over 10 dwellings or more or non-residential development of 1,000 sq m or more will be expected to link into the existing decentralised energy network or demonstrate why this is not feasible.</i></p>	To address the following as discussed at hearings on 26 th September; to refer to decentralised energy sources generally in order to future-proof the policy and avoid giving undue preference to CHP; to clarify that there are many ways of fulfilling the requirements of CC4; to refer to the SPD in the explanatory text of policy CC4; and to emphasise the potential of ground and air source heat pumps.

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p>4.1.12 Decentralised energy is a term that covers a variety of technologies, including various renewable technologies, and more efficient energy generation such as Combined Heat and Power (CHP), which provides heating and electricity at the same time. This policy promotes the use of decentralised energy including CHP and district heating, which has particular applications to a dense urban area such as Reading. It provides an explanation of when CHP or district heating should be considered as an energy efficient design measure to achieve the most up to date requirements for residential development and BREEAM requirements for other types of development. More information on decentralised energy will be published in the forthcoming Sustainable Design and Construction SPD.</p> <p>4.1.13 Electricity production is currently dominated by a centralised electricity generating system. Centralised electricity generating stations waste around two thirds of the energy in the fuels they use through the production of waste heat in generation then in electricity transmission and distribution to end users. On average around 65% of the energy is lost before it even reaches consumers. If better use could be made of this waste heat, and transmission distances could be reduced, there would be major benefits in tackling climate change and improving security of supply. A decentralised energy system (which might include CHP) can help address these issues.</p> <p>4.1.14 In addition the opportunity to reduce carbon emissions associated with heating requirements can be realised through the use of low carbon fuels such as biomass in the form of woodchip or wood pellets. The use of these fuels is often impractical and uneconomic on an individual dwelling basis but can be feasible when a higher heat load can be supplied from a central heat source with heat distributed to individual users via a pipe network, often termed district or community heating.</p> <p>4.1.15 CHP plants, although often fuelled by fossil fuels, are much more efficient than large centralised power stations, because the heat is used either as process heat in industry or distributed around buildings via a district heating system. The availability of a local district energy network connected to the decentralised energy generation plant means the CHP plant can be integrated with other fuels/technologies such as biomass,</p>	

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p>geothermal energy, or solar collectors. Much lower levels of energy are lost in transmission compared to centralised generation because distances from the point of generation to the point of use are relatively very short. Given that CHP involves the simultaneous generation of usable heat and power (usually electricity) in a single process, the amount of heat that is wasted is reduced and the heat that would normally be wasted to the atmosphere, rivers or seas can be put to use. Air-source or ground-source heat pumps should be considered in the first instance, as these methods are less carbon intensive than CHP.</p> <p>4.1.16 By seeing the energy system as a whole and locating energy production close to where it is used, it is possible to use both the heat and electricity generated and provide a doubling in the efficiency of current electricity generation and use as delivered by the mix of centralised power stations.</p> <p>4.1.17 The NPPF actively promotes bringing forward decentralised energy, with an expectation that new development will comply with adopted Local Plan policies on local requirements for decentralised energy. The NPPF also refers to identifying opportunities for energy supply for development to be drawn from a decentralised, renewable or low carbon supply system and for co-locating potential heat customers and suppliers.</p> <p>4.1.18 Following the production of heat spot maps, a feasibility study of the Borough, carried out by Thames Valley Energy (TVE), has identified potential opportunities for decentralised energy provision including district heat energy provision and CHP plant, which consider both existing and likely new development in the Borough as currently allocated. Potential for district heat and energy provision is being explored in areas of the town centre but represents just one of many possible ways of fulfilling the requirements of policy CC4.”</p>	
MM5	32	CC9 and 4.1.50	<p><i>“Proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time.</i>”</p>	To reflect most up-to-date case law, as agreed in Statement of Common Ground (EC042), and to remove reference to

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p><i>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.</i></p> <p><i>In determining appropriate provision or contribution, the highest priority will be given to the following:</i></p> <ul style="list-style-type: none"> • <i>Transport infrastructure, including major cross boundary or sub-regional infrastructure projects;</i> • <i>Open space, green infrastructure and other measures to improve or enhance biodiversity;</i> • <i>Education, including cross-boundary facilities;</i> • <i>Economic development services and infrastructure, including employment, skills and training development initiatives and childcare provision.</i> <p><i>Where relevant a high priority will also be given to the appropriate provision of the following:</i></p> <ul style="list-style-type: none"> • <i>Energy infrastructure, including decentralised energy projects;</i> • <i>Health provision; and</i> • <i>Police Service infrastructure.</i> <p><i>Other measures, as follows, should also be considered where a specific need is identified and justified:</i></p> <ul style="list-style-type: none"> • <i>Community facilities;</i> • <i>Leisure and cultural infrastructure;</i> • <i>Reading Central Area infrastructure and amenities, including public realm and street care enhancements;</i> • <i>Environmental improvements outside the Central Area, such as within local</i> 	<p>affordable housing contributions as set out in the Inspector's Post-Hearing Advice.</p>

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p><i>centres, including off-site street tree and other tree planting;</i></p> <ul style="list-style-type: none"> • <i>Measures to tackle poor air quality or for on-going air quality monitoring; and</i> • <i>Flood mitigation and prevention measures.</i> <p><i>Developers are required to contribute towards the ongoing local authority costs of monitoring the implementation and payment of planning contributions.</i></p> <p>...</p> <p>4.1.50 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, more congestion and longer commuting distances. Pressure on housing can particularly affect those who cannot afford open market housing. One possible way to mitigate these impacts is through maximising the potential of the existing population to fill jobs, through improving skills, changing working practices or providing childcare facilities. <i>In addition, new employment development can contribute to the provision of affordable housing.</i> Therefore, such development should include mitigation commensurate with its impact on the demand for <i>housing,</i> labour and skills.”</p>	
MM6	37	EN1	<p><i>“Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include:</i></p> <ul style="list-style-type: none"> • <i>Listed Buildings;</i> • <i>Conservation Areas;</i> • <i>Scheduled Monuments;</i> • <i>Historic parks and gardens; and</i> • <i>Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.</i> <p><i>All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to</i></p>	To respond to the information (EP033) provided by Historic England

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p><i>avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.</i></p> <p><u><i>Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.</i></u></p> <p><u><i>Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.</i></u></p> <p><i>Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.</i></p> <p><i>The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers.</i></p> <p><i>Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.”</i></p>	
MM7*	39	EN2	<p><i>“Development proposals which will have an adverse effect on scheduled monuments and other nationally important archaeological remains and their settings will not be allowed <u>unless there is clear and convincing justification in the form of overriding public benefits.</u>”</i></p>	To respond to a comment by Historic England
MM8	44	4.2.25	<p><i>“The National Planning Policy Framework states that local communities, through local plans, are able to identify Local Green Space for specific protection which is of</i></p>	To clarify the difference between Local Green Space

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			particular importance to them. The aim of this policy is therefore to define the boundaries of Local Green Space, based on the criteria in the NPPF. Local Green Spaces can only be designated during local plan preparation or review and must be capable of enduring beyond the end of the plan period. The policy also defines Public Open Space, where the local policy position is the same, but which do not benefit from the additional protection afforded by the Local Green Space designation as they do not fulfil the relevant criteria.	and Public Open Space as discussed at hearings on 27 th September
MM9*	51	EN12	<i>“a) The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network.”</i>	To respond to a comment by SGN and Danescroft
MM10	54	4.2.65	“Reading is primarily an urban area, but it benefits from a number of natural features that have remained largely undeveloped. The urban context means that the preservation of these features as a backdrop is of particular importance. New development should seek to maintain and enhance the natural beauty and visual amenity of the identified major landscape features. The extent to which new development prevents or minimises the visual impact on major landscape features and other landscape values is largely dependent on the location, design and scale of proposals. Landscape and Visual Impact Assessment (LVIA) can provide a useful methodology for assessing landscape impact where the setting of an AONB would be affected . It should be noted that this policy does not rule out development in or close to these areas, but seeks to ensure that development only takes place where it can preserve or enhance the character or appearance of the feature.”	To clarify that LVIA applies to AONBs only as discussed at hearings on 27 th September
MM11**	55	4.2.67- 4.2.68	“4.2.67 Trees, hedges and woodlands help define the landscape and character of the Borough and provide multiple benefits to the urban environment including maintaining and enhancing biodiversity, absorbing carbon and helping to adapt to climate change. Reading’s woodlands are a highly visible feature of the ridgelines and a strong feature in the landscape of the river valleys that shape the urban area. Trees are also an important component of the character of many parts of the Borough particularly its older developed areas and suburbs and especially in Conservation Areas. Many streets within Reading, including primary routes into town, are characterised by their tree-lined nature, which should be protected and enhanced. Whilst Reading has some important woodlands and areas with substantial numbers of trees, including two areas	To respond to a comment by BBOWT and to clarify when off-site planting may be appropriate.

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p>of Ancient Woodland, shown on the Proposals Map⁵¹, other areas lack tree cover. It is therefore vital to ensure that important trees and woodlands are protected and canopy cover extended in areas lacking cover, including in conjunction with new development. This will particularly be the case for irreplaceable Ancient Woodland and veteran trees.</p> <p>4.2.68 Trees can make a positive contribution towards reducing the effects of future climate change by dissipating the impact of heavy rainfall, reducing urban temperatures and providing shade and protection against the detrimental effects of sunlight. New development should seek to incorporate strategically sited trees that will provide shade and cooling to developments, particularly to street frontages, large hard landscaped areas and other areas of public realm. Off-site tree provision will be appropriate in some cases where it has been demonstrated that acceptable development cannot provide an appropriate level of mitigation planting (where trees are to be removed) and/or new planting within the site. This will be of particular importance where such sites are within or on priority tree planting areas/routes, as defined in the Tree Strategy. There will be a need to use appropriate large canopy species that are adaptable to future predicted climatic conditions (native species if possible and where appropriate in order to deliver biodiversity benefits), particularly the higher temperatures and potential drought conditions predicted in summer. Tree stock should either be UK grown or sourced from a domestic nursery that retains its trees for a minimum of one year (a full growing season) within the UK before sale to ensure plant health and non-infection by foreign pests or disease.”</p>	
MM12	57-58	4.2.79- 4.2.82	<p>“4.2.79 The AQMA, shown on the Proposals Map highlights the main area of concern, and focus for this policy, however it may be that in certain circumstances ensuring high levels of air quality is important for the whole of Reading, and air quality may be a consideration outside the AQMA. Some schemes may potentially significantly impact air quality outside of the AQMA, or may have effects on the AQMA, for example through large-scale traffic generation.</p> <p>4.2.80 This policy aims to ensure that increased development within the AQMA Reading does not lead to a net increase in emissions as well as ensuring any increased exposure within the poorest areas of air quality is accompanied by appropriate mitigation. Mitigation measures vary for each case, but can include simple measures designed into</p>	To make clarifications to highlight that air quality may be an issue both within and outside the AQMA and to make clearer on what basis an Air Quality Assessment will be required, as discussed at hearings on 27 th September.

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p>the scheme from the outset. The most likely mitigation through design involves setting residential units further back from busy roads, however, in some circumstances this could also include siting habitable rooms away from the façade fronting the pollution source, or, in the case of mixed use development, limiting the residential accommodation to higher floors. Other mitigation measures may also include travel plans, restrictions in car access or parking, planting, green walls or certain types of paving that absorb NO2. It does not mean that the development of sensitive uses in the AQMA where they would be exposed to poor air quality will necessarily be inappropriate.</p> <p>4.2.81 In some cases, an Air Quality Assessment (AQA) will be required with a planning application. The requirement for an assessment will depend entirely on the exact nature and location of the application. However, broadly speaking, developments will be likely to require an AQA if they are <u>major developments (10 dwellings or 1,000 sq m of floorspace or more)</u> located within <u>or accessed from</u> the AQMA and:</p> <ul style="list-style-type: none"> • Would lead to a material increase in congestion or HGVs; • Would include significant amounts of car parking, for example 100 spaces, or would significantly increase current provision, for example by 25%; • Would emit air pollutants that would affect sensitive receptors, including areas of biodiversity importance such as priority habitats; or <p><u>An AQA will also be likely to be required if a development of any scale</u> W would locate <u>new</u> sensitive receptors, such as residential, in areas of particularly poor air quality, such as on the façade of a very busy road.</p> <p>4.2.82 The above criteria are meant as a guide only, and in reality there may be schemes which may meet one or more of the above but may not require an AQA. Conversely there may be schemes which do not meet the above but may require an assessment. <u>More detailed guidance about how to judge which developments might lead to a material increase in congestion or HGVs is included within Planning for Air Quality (EPUK and IAQM, 2017)⁵⁵, although this may be subject to update within the plan period, which means that including that detail within the Local Plan is not appropriate.</u> It is strongly recommended that the Council’s Environmental Protection Team is contacted if it is believed an assessment may be required, as they will be able to provide guidance as well as advice on the level of detail required within the</p>	

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p>assessment and providing monitoring data.”</p> <p><i>Add new footnote and renumber subsequent footnotes</i></p> <p>“⁵⁵ Land-Use Planning & Development Control: Planning For Air Quality (Environmental Protection UK, Institute of Air Quality Management, 2017) http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf”</p>	
MM13	63	EN17	<p>“Where noise generating equipment is proposed, the noise source rating-specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor.”</p>	To correct an error - see Council Response to Issue 5 (EC007)
MM14	63	4.2.99	<p><i>Insert new paragraph and renumber subsequent paragraphs</i></p> <p>“4.2.100 The SFRA also defines the extent of the functional floodplain within Reading. The 2017 SFRA, in describing how this has been approached, distinguishes between Flood Zone 3b ‘Functional Floodplain’ and Flood Zone 3b ‘Developed’. For clarity, the final definition on the flood zone maps F4 in the SFRA incorporates both of these categories, and it is this combined area which should be considered as Flood Zone 3b for the purposes of applying policy.”</p>	To ensure that the functional floodplain is correctly identified as discussed at hearings on 26 th September.
MM15	65-66	EM1, 4.3.6 and 4.3.7	<p>“Provision will be made for a net increase of 53,000-112,000 sq m of office floorspace and 148,000 sq m of industrial and/or warehouse space in Reading Borough for the period 2013 to 2036.</p> <p><i>Development that would exceed the levels of employment development set out in this policy, after existing permissions and allocations are accounted for, will need to either: (a) demonstrate that it will not result in additional need for local housing; or (b) mitigate its impacts on the need for local housing, either which may be through the provision of additional residential or through contributions to affordable housing.</i></p> <p><i>Proposals to provide a freight consolidation centre in a location with good access to the strategic highway network will be supported, subject to other policies in</i></p>	To remove reference to affordable housing contributions as set out in the Inspector’s Post-Hearing Advice (EI014).

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p><i>this plan.</i></p> <p>...</p> <p>4.3.6 There is currently a reasonable balance between the levels of employment planned for in Policy EM1 and the levels of housing set out in H1, as the relationship between employment and housing levels formed part of the evidence that supports these policies. That means that planning for levels of employment development over and above the upper amounts set out in this policy (when considered across the wider area) is likely to lead to an imbalance, and a greater need for housing within the area, as well as increasing the need to travel as workers commute from further afield.</p> <p>4.3.7 Therefore, where a development is proposed that would increase the level of employment development over the upper levels currently planned for, taking account of developments with planning permission and with outstanding allocations in this plan for employment use, the concerns about impacts on local housing need to be allayed. This will need to be achieved either by convincing justification as to why there will be no effects, or by adequately mitigating any effects, <u>for instance through additional residential</u>. The Annual Monitoring Report will inform whether these thresholds have been reached.”</p>	
MM16**	69	EM3 and 4.3.13	<p><i>“Within the Core Employment Areas, the overall level of employment land should be maintained. Proposals that would result in a loss of such land will not be permitted <u>other than in the exceptional circumstances described below</u>.</i></p> <p><i>Where, in exceptional circumstances, it can be demonstrated that a site in a Core Employment Area has no long-term (i.e. <u>over five years</u>)-prospect of employment use, a related alternative commercial use <u>or a use which complements the employment use of the area</u> may be considered that would <u>not result in a significant reduction in jobs-employ a similar number of people</u>.</i></p> <p><i>In other areas, the following criteria will be considered when assessing proposals which would result in a loss of employment land: -</i></p>	To ensure that the first and second paragraphs relate better to one another, and clarify the significance of five years, as discussed in hearings on 27 th September, and to respond to a comment by Thames Properties Ltd.

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p>(i) <i>Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?</i></p> <p>(ii) <i>Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?</i></p> <p>(iii) <i>Is there a surplus of a similar size and type of accommodation in Reading?</i></p> <p>(iv) <i>Would continued employment use of the site detrimentally affect the amenity and character of a residential area?</i></p> <p>(v) <i>Is the need for alternative uses stronger than the need for the retention of employment land?</i></p> <p>(vi) <i>Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?</i></p> <p>4.3.12 There is a need for a certain degree of flexibility with existing employment land to allow an appropriate balance of uses to develop in the right locations. For this reason, it is not appropriate to simply apply a blanket protection to all existing employment areas. However, the Core Employment Areas have been identified as those areas of greatest economic significance, providing space that is required to ensure that the Reading economy is balanced and that those activities which support higher value businesses are in close proximity. As a result, an overall loss of employment land in these core areas would risk undermining the local economy, and should not be permitted. It is worth emphasising that this policy does not primarily aim to protect a specific number of jobs (which could be replaced in a non-employment use), but is rather about balance of the economy.</p> <p>4.3.13 The policy recognises that on some exceptional sites within the CEA, there may not be any long-term prospect of re-use or redevelopment for employment, and in these cases it is preferable for a site to be used for an alternative commercial use that complements the area than for it to be vacant in the long-term. Long term vacancy in this case can be taken to mean five years or more, as shorter time periods might be the result of short-term economic conditions. For example, some of the older industrial areas contain large sites that were tailored to the needs of a specific type of operation</p>	

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			that no longer exists or operates in the same way, making it unviable to re-let, either in its existing form or sub-divided, in the long-term. If there is also no long-term prospect of redevelopment of these sites for employment, alternative commercial uses under this policy may be considered.”	
MM17	72-73	H1	<p>“H1: PROVISION OF HOUSING</p> <p><i>Provision will be made for at least an additional 15,433 15,847 homes (averaging 671 689 homes per annum) in Reading Borough for the period 2013 to 2036.</i></p> <p><i>The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 644 230 dwellings that cannot be provided within Reading will be met over the plan period.</i></p> <p>4.4.1 There is a pressing need for additional housing in Reading and the surrounding area. The six Berkshire authorities (Reading Borough Council, Bracknell Forest Borough Council, Slough Borough Council, West Berkshire District Council, the Royal Borough of Windsor and Maidenhead and Wokingham Borough Council) together with the Thames Valley Berkshire Local Enterprise Partnership co-operated on the production of a Berkshire (with South Bucks) Strategic Housing Market Assessment, which reported in February 2016⁷⁰. This study identified the Housing Market Areas within which the Berkshire authorities should work, and set out levels of housing need between 2013 and 2036.</p> <p>4.4.2 The SHMA identifies Reading as being part of a Western Berkshire Housing Market Area, together with West Berkshire, Wokingham and Bracknell Forest. Within this area, an ‘objectively assessed need’ is identified for a total of 2,855 new homes every year up to 2036. Reading’s share of this need is 699 homes per year, or a total of 16,077 between 2013 and 2036. The expectation in the NPPF is that local planning authorities should meet their need unless they can demonstrate that doing so is not possible.</p>	To take account of most up-to-date information on housing provision since the submission version in March 2018. This includes housing completions between 2017 and 2019, new permissions, changes to allocations (MM43 and MM47) and other up-to-date information on sites. Full explanation is in the Revised Local Plan Housing Trajectory April 2019 (EC044).

Ref	Page	Policy/ Paragraph	Main Modification	Reason														
			<p>4.4.3 However, Reading is a very tightly defined urban area, and sites for new development are limited. The undeveloped land that does exist is mainly either in the functional floodplain or is important public open space. Provision of new housing therefore involves a heavy reliance on previously developed land, and the supply of such sites constrains the amount of housing that can be delivered in the Borough. The Council therefore needs to set targets for housing provision that are capable of being met.</p> <p>4.4.4 It is considered that of the 16,077 homes needed, 15,433 <u>15,847</u> can be delivered in Reading Borough, which equates to 671 <u>689</u> dwellings per annum. A Housing and Economic Land Availability Assessment⁷¹ (HELAA) has demonstrated that this is the level of housing development that Reading can realistically accommodate in the plan period. This uses a methodology that has been jointly agreed with four other Berkshire authorities, and examines each site with potential for ten dwellings or more, in terms of its development capacity, suitability, availability and achievability, as well as making an allowance for windfall development on sites of less than ten dwellings. The HELAA was carried out in November 2017, but the information on housing supply has been updated to 31st March 2019. The expected provision breaks down as follows:</p> <table border="1" data-bbox="613 911 1626 1315"> <tbody> <tr> <td>Total need for Reading Borough 2013-36</td> <td>16,077 homes</td> </tr> <tr> <td>Minus completed 2013-2017-2019</td> <td>2,514 <u>4,202</u> homes</td> </tr> <tr> <td>Minus permitted or resolution to grant (>10 dwellings) at November 2017-31st March 2019⁷²</td> <td>4,153 <u>4,696</u> homes</td> </tr> <tr> <td>Minus allowance for small site (<10 dwellings) windfalls at 127 per year 2017-2019-2036</td> <td>2,413 <u>2,159</u> homes</td> </tr> <tr> <td>Remainder not already identified</td> <td>6,997 <u>5,020</u> homes</td> </tr> <tr> <td>Identified in Local Plan</td> <td>6,349 <u>4,790</u> homes</td> </tr> <tr> <td>Shortfall to be accommodated elsewhere in HMA</td> <td>644 <u>230</u> homes</td> </tr> </tbody> </table> <p>4.4.5 The Local Plan includes a Housing Trajectory at Appendix 1, which sets out how</p>	Total need for Reading Borough 2013-36	16,077 homes	Minus completed 2013-2017-2019	2,514 <u>4,202</u> homes	Minus permitted or resolution to grant (>10 dwellings) at November 2017-31st March 2019 ⁷²	4,153 <u>4,696</u> homes	Minus allowance for small site (<10 dwellings) windfalls at 127 per year 2017-2019-2036	2,413 <u>2,159</u> homes	Remainder not already identified	6,997 <u>5,020</u> homes	Identified in Local Plan	6,349 <u>4,790</u> homes	Shortfall to be accommodated elsewhere in HMA	644 <u>230</u> homes	
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Ref	Page	Policy/ Paragraph	Main Modification	Reason
	217- 219	Figure 10.1	<p>the housing requirement in policy H1 is expected to be met over the plan period, including forecast completions for each year. The Housing Trajectory will be kept up to date and a revised version published each December in the Council’s Annual Monitoring Report (AMR). The AMR will also include an up-to-date assessment of the five-year housing land supply, a requirement of national policy. This will highlight any issues with the delivery of new homes, and whether there is any need to address issues through measures such as a plan review or through discussions with other authorities under the duty to co-operate.</p> <p>4.4.56 Delivering the level of housing set out in policy H1 will mean that there is a shortfall of 644-230 dwellings when considered against Reading’s need. This will need to be accommodated elsewhere within the Western Berkshire Housing Market Area. The other three authorities within the HMA recognise that there will be issues with Reading’s ability to accommodate its need within its own boundaries, and this issue is set out within the West of Berkshire Spatial Planning Framework to which the four authorities have signed up⁷³. There will be continuing dialogue on this matter between the affected authorities which will inform local plans. Where agreement is reached, it will be for individual authorities’ Local Plans to specify where development will be located.”</p> <p><i>Make the following alterations to the entries on Figure 10.1</i></p> <ul style="list-style-type: none"> • CR11a - change from In Progress/Short/Medium to Short/Medium/Long (26-31) • CR11i - change from Medium/Long (26-31) to Medium/Long (26-31)/Long (31-36) • CR12b - change from In Progress/Short/Medium to Short/Medium/Long (26-31) • CR12c - change from Short/Medium to In Progress/Short/Medium/Long (26-31) • CR12d - change from Long (26-31) to Medium • CR14a - change from Short to Short/Medium • CR14k - change from Medium to In Progress • CR14l - change from Short to Medium • SR1b - change from Short to In Progress • WR1 - change from In Progress/Short to In Progress/Short/Medium 	

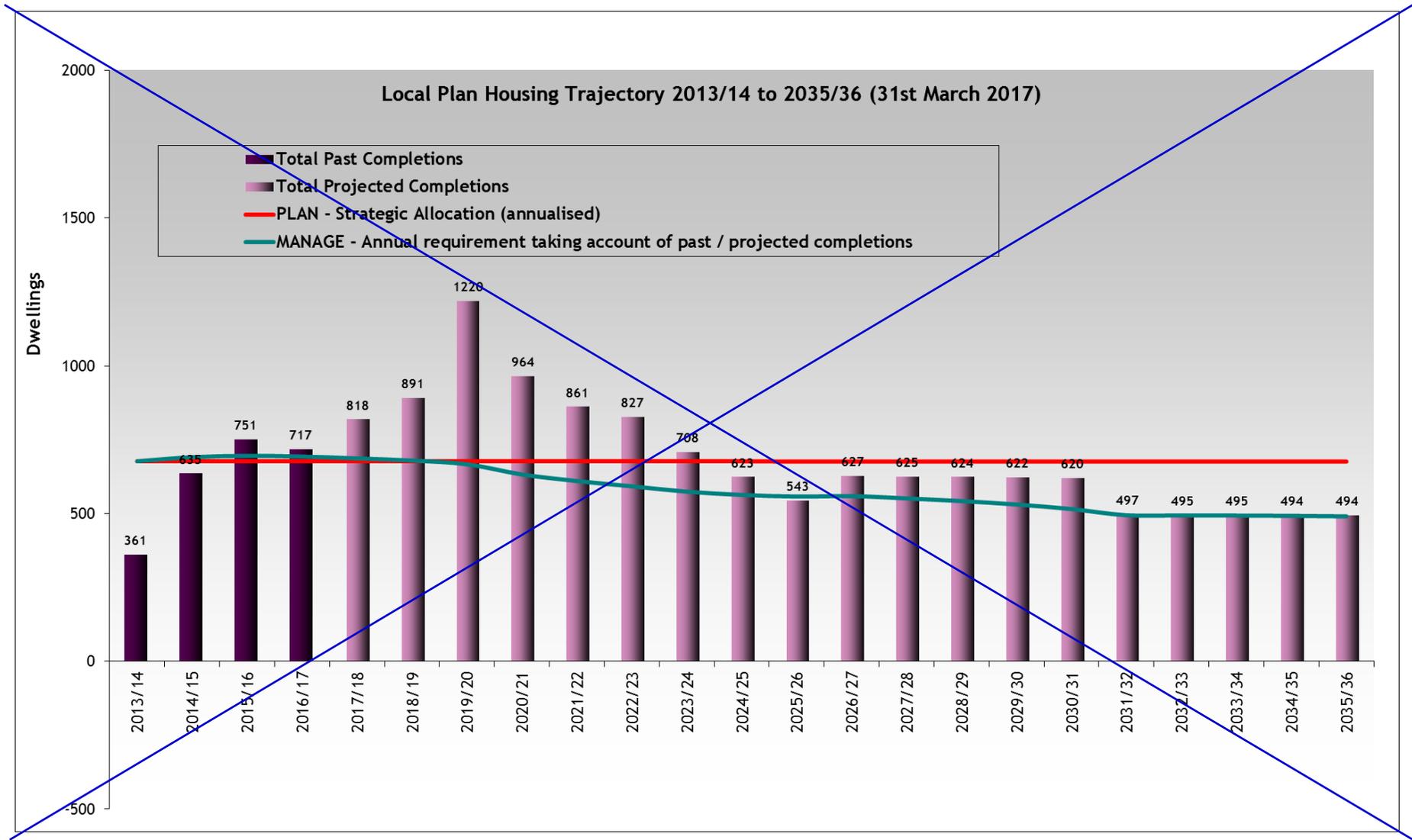
Ref	Page	Policy/ Paragraph	Main Modification	Reason							
	229	11.1.4 and Figure 11.1	<ul style="list-style-type: none"> • WR3r - change from Short to Medium • CA1a - change from Short to Medium <p>“11.1.4 This Local Plan proposes to provide the vast majority, but not all, of Reading’s housing need. A shortfall of 644-230 dwellings has been identified, to be provided elsewhere in the Western Berkshire Housing Market Area. The Council will play an active role in promoting the provision of these homes in other authorities, and will monitor progress in their provision. This will include the progress of other local authorities within the Housing Market Area in undertaking Local Plan reviews that help to meet the shortfall, and the progress in delivering homes against housing targets set out in Local Plans, including maintaining a five-year housing land supply.</p> <p>11.1.5 Where monitoring, particularly the updated housing trajectory that will be published in the Annual Monitoring Report, demonstrates that there will not be sufficient progress on meeting this shortfall, the Council will consider the reasons for this, and will consider whether the extent of the lack of progress is sufficient to trigger a full or partial review of the Local Plan.”</p> <p><i>Make the following change to Figure 11.1</i></p> <table border="1" data-bbox="611 979 1664 1050"> <tr> <td data-bbox="611 979 936 1050">Amount of new housing delivered (net change)</td> <td data-bbox="936 979 1061 1050">H1</td> <td data-bbox="1061 979 1189 1050">671-689</td> <td data-bbox="1189 979 1323 1050">Annual</td> <td data-bbox="1323 979 1435 1050">RBC</td> <td data-bbox="1435 979 1559 1050">Annual</td> <td data-bbox="1559 979 1664 1050">AMR</td> </tr> </table>	Amount of new housing delivered (net change)	H1	671-689	Annual	RBC	Annual	AMR	
Amount of new housing delivered (net change)	H1	671-689	Annual	RBC	Annual	AMR					
	244-245	Appendix 1	<p><i>Make the changes to Appendix 1: Housing Trajectory shown overleaf.</i></p>								

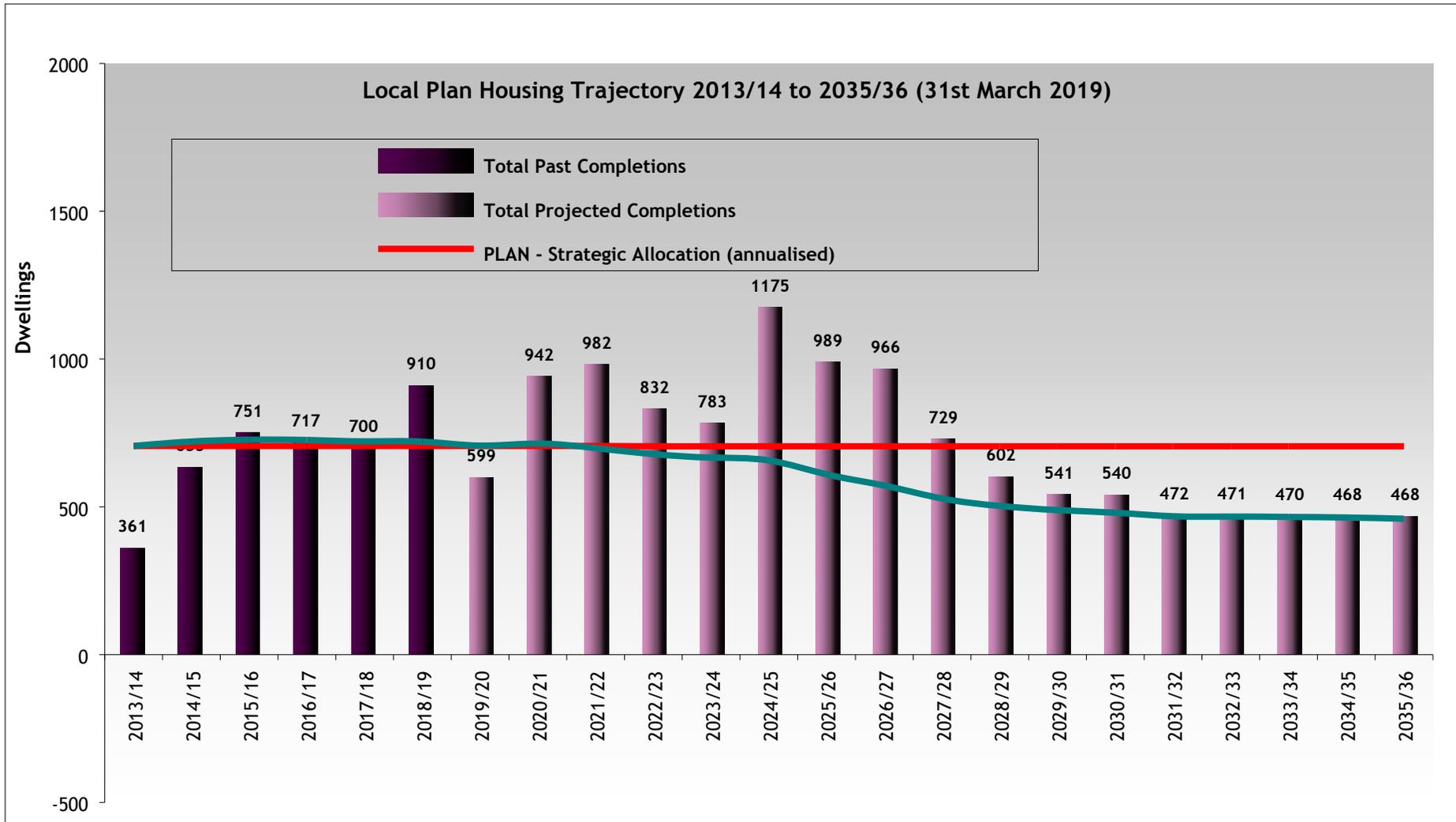
Appendix 1: Housing Trajectory 2013/14 to 2035/36 as at 31st March [2017-2019](#)

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	TOTAL			
Small Scale unidentified sites (<10 units)	123	129	80	103	<u>127</u> <u>141</u>	<u>127</u> <u>124</u>	127	127	127	127	127	127	127	127	127	127	127	127	127	127	127	127	127	2848	2859		
Permitted and under constr (10+), no lapse rate					691	458	284 465	199 565	113 125	100 101	59 100	0	0	0	0	0	0	0	0	0	0	0	0	0	1904	1356	
Permitted and not started (10+), incl lapse rate					295	473	233 7	95 370	74 697	0 489	0 448	0 505	0 332	0 270	0 145	0 59	0	0	0	0	0	0	0	0	0	1167	3322
Permitted subject to S106 (10+), incl lapse rate					0	0	37 0	28 -1	0 19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	65	18	
Permitted since 15/16 ¹²⁷ (10+), 10% lapse rate					0	12	280	349	90	90	90	90	16	0	0	0	0	0	0	0	0	0	0	0	0	4017	
Sites in Local Plan, 10% or 20% lapse rate	0	0	0	0	0	0	79 0	86 0	434 14	436 115	430 108	405 543	400 530	500 569	498 458	497 417	495 414	493 413	370 345	368 344	368 343	367 341	367 341	367 341	6593	5295	
Other allowances					0	0	-60 0	-58 -120	2 0	2 0	2 0	2 0	0	0	0	0	0	0	0	0	0	0	0	0	-109	-120	
Past completions (C3 housing)	361	635	751	717	<u>700</u>	<u>910</u>																			2464	4074	
Past completions (non-C3 residential) ¹²⁸⁻¹²⁷	0	-41	-5	96	<u>36</u>	<u>42</u>																			50	128	
Total past completions (all)	361	594	746	813	<u>736</u>	<u>952</u>																			2514	4202	
Total projected completions					818	891	1220 599	964 942	861 982	827 832	708 783	623 1175	543 989	627 966	625 729	624 602	622 541	620 540	497 472	495 471	495 470	494 468	494 468	494 468	494	130501	2030
Cumulative completions	361	955	1701	2514	<u>3332</u> <u>3250</u>	<u>4223</u> <u>4202</u>	<u>5443</u> <u>4801</u>	<u>6407</u> <u>5743</u>	<u>7268</u> <u>6724</u>	<u>8095</u> <u>7556</u>	<u>8803</u> <u>8339</u>	<u>9426</u> <u>9514</u>	<u>9970</u> <u>10504</u>	<u>10597</u> <u>11470</u>	<u>11222</u> <u>12200</u>	<u>11846</u> <u>12802</u>	<u>12468</u> <u>13343</u>	<u>13088</u> <u>13883</u>	<u>13585</u> <u>14356</u>	<u>14080</u> <u>14826</u>	<u>14575</u> <u>15296</u>	<u>15069</u> <u>15764</u>	<u>15564</u> <u>16232</u>				
MONITORING AGAINST LOCAL PLAN TARGETS																											
PLAN - Housing (per annum)	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>699</u> <u>689</u>	<u>154331</u> <u>5847</u>												
PLAN - Non-C3 residential (resi equiv per annum) ¹²⁸⁻¹²⁷	<u>6</u> <u>17</u>	<u>6</u> <u>16</u>	<u>6</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>5</u> <u>16</u>	<u>127</u> <u>377</u>								
PLAN - Total strategic allocation (annualised)	<u>677</u> <u>706</u>	<u>677</u> <u>705</u>	<u>677</u> <u>705</u>	<u>677</u> <u>705</u>	<u>677</u> <u>705</u>	<u>676</u> <u>705</u>	<u>676</u> <u>705</u>	<u>676</u> <u>705</u>	<u>676</u> <u>705</u>	<u>15560</u> <u>16224</u>																	
MONITOR - No dwellings above or below cumulative allocation	<u>-316</u> <u>-345</u>	<u>-399</u> <u>-457</u>	<u>-330</u> <u>-417</u>	<u>-194</u> <u>-310</u>	<u>-53</u> <u>-280</u>	<u>161</u> <u>-34</u>	<u>704</u> <u>-141</u>	<u>991</u> <u>95</u>	<u>1175</u> <u>370</u>	<u>1325</u> <u>497</u>	<u>1356</u> <u>575</u>	<u>1302</u> <u>1045</u>	<u>1170</u> <u>1330</u>	<u>1121</u> <u>1591</u>	<u>1070</u> <u>1616</u>	<u>1018</u> <u>1513</u>	<u>964</u> <u>1349</u>	<u>908</u> <u>1184</u>	<u>729</u> <u>952</u>	<u>548</u> <u>717</u>	<u>367</u> <u>482</u>	<u>185</u> <u>245</u>	<u>4</u> <u>8</u>				
MANAGE - Annual requirement taking account of past / projected completions	<u>677</u> <u>706</u>	<u>691</u> <u>721</u>	<u>695</u> <u>727</u>	<u>693</u> <u>726</u>	<u>687</u> <u>722</u>	<u>679</u> <u>721</u>	<u>667</u> <u>707</u>	<u>632</u> <u>714</u>	<u>640</u> <u>699</u>	<u>592</u> <u>679</u>	<u>574</u> <u>667</u>	<u>563</u> <u>657</u>	<u>558</u> <u>610</u>	<u>559</u> <u>572</u>	<u>551</u> <u>528</u>	<u>542</u> <u>503</u>	<u>531</u> <u>489</u>	<u>515</u> <u>480</u>	<u>494</u> <u>468</u>	<u>494</u> <u>467</u>	<u>493</u> <u>466</u>	<u>492</u> <u>464</u>	<u>491</u> <u>460</u>				

¹²⁷Or with resolution to grant subject to Section 106

¹²⁸⁻¹²⁷Expressed as a dwelling equivalent – see paragraph A1.3





MM18	74-75	H2, 4.4.6 and 4.4.14	<p><i>“The appropriate density of residential development will be informed by:</i></p> <ul style="list-style-type: none"> • <i>the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;</i> • <i>its current and future level of accessibility by walking, cycling and public transport;</i> • <i>the need to achieve high quality design;</i> • <i>the need to maximise the efficiency of land use; and</i> • <i>the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.</i> <p><i>Indicative densities for different types of area are set out in figure 4.5, but the criteria above may indicate that a different density is appropriate. <u>Residential development capacity figures within the site allocation policies are often based on these densities, but the capacity of each site will likewise depend on various factors that need to be addressed at application stage, including detailed design and layout, and may differ from the range set out in the allocation.</u> Net densities of below 30 dwellings per hectare will not be acceptable.</i></p> <p><i>Wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms. As a minimum, on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations.</i></p> <p><i>Residential proposals for ten houses or more (excluding houses that are to be provided as affordable homes) will be expected to consider making appropriate provision for plots as self- or custom-build <u>wherever viable and achievable</u>, based on the number of entries on the self-build register. The provision of self-build plots will be secured through legal agreement. Any plots that have not been sold after 12 months of appropriate marketing will revert to the developer to build.</i></p>	<p>To reflect the approach to indicative development capacities in site allocations, as specified in Inspector’s Post Hearing Advice.</p> <p>To include reference to viability for self-build and to improve clarity, as discussed in hearings on 28th September.</p>
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			<p>4.4.6 With the significant need for housing in Reading and surrounding areas, it is important that efficient use is made of the land that is available to boost the delivery of new homes. However, there are other considerations that need to be weighed against this, in particular the character of the surrounding areas and any other particular sensitivities. Each site has its own particular characteristics, and it is not appropriate to set down exact densities in this policy. <u>Likewise, dwelling figures in site allocations policies CR11-14, SR2-4, WR1-3, CA1-2 and ER1 should be treated as indicative, as the capacity of sites will ultimately depend on various factors that need to be addressed at application stage, including detailed design and layout. This may mean that dwelling totals for an allocated site fall outside the indicative range specified in the respective policy.</u></p> <p>...</p> <p>4.4.14 It is highly unlikely that the statutory duty to grant enough permissions will be met without some form of policy intervention. For this reason, it is considered appropriate that larger schemes of houses (not including flats and maisonettes <u>or non-C3 forms of housing such as student accommodation</u>) should consider making a contribution to meeting this need. The level of contribution would depend on the scale of the self-build need at the time. The following formula gives an indication of the appropriate level of provision, and is based on an estimate of the expected number of overall houses on sites to which the policy would apply. This is subject to a cap, so that no development would be expected to deliver more than 20% of houses as self-build.”</p>	
MM19	76-78	H3, 4.4.20 and 4.4.23	<p>“Residential development will make appropriate contribution towards affordable housing to meet the needs of Reading</p> <ul style="list-style-type: none"> • on sites of 10 or more dwellings, 30% of the total dwellings will be in the form of affordable housing; • on sites of 5 - 9 dwellings, <u>a financial contribution will be made that will enable the equivalent of 20% of the housing to be provided as affordable housing elsewhere in the Borough-20% provision of the total dwellings will be in the form of affordable housing;</u> and • on sites of 1 - 4 dwellings, a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable 	<p>Changes for the following reasons:</p> <ul style="list-style-type: none"> • To reflect practical difficulties in achieving on-site provision on sites of 5-9 dwellings, as initially discussed in hearings on 28th September, and considered within the Post-Hearing Advice (EI014), Additional

			<p><i>housing elsewhere in the Borough.</i></p> <p><i>For sites of 10 or more than 4 dwellings, provision should be made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate.</i></p> <p>...</p> <p>4.4.20 Affordable housing contributions will be sought from residential-only developments and mixed-use developments. On-site provision (serviced land or completed units) of affordable housing will always be sought in the first instance <u>on sites of 10 dwellings or more</u>. Where there are exceptional reasons, the provision of surrogate sites (serviced land or completed units) or commuted sums that will enable the provision of a commensurate number and mix of affordable units, will be considered. Examples of exceptional circumstances may include sites where there are existing concentrations of particular types of affordable housing, where there are demonstrable benefits to be gained by providing the new units elsewhere (e.g. to create more socially-balanced communities), or where there is an opportunity to provide a particular type of much needed housing elsewhere (e.g. family housing). In the case of commuted sums, the Council will choose the registered provider to which to direct the funding or may use the contribution for Local Authority New Build. Under this policy it is accepted that affordable housing provision can take place off site or through contributions in the case of sites of less than <u>5-10</u> dwellings.</p> <p>4.4.21 Affordable housing contributions must be secured in perpetuity and thus be available to successive generations of households in recognised housing need. The most effective way of doing this is through the involvement of a registered provider (RP).</p> <p>4.4.22 The target set in the policy has been determined as the result of an assessment of the viability of development of sites of various sizes in the Borough in accordance with the requirements of the NPPF. This will be the expected level of affordable housing provision.</p> <p>4.4.23 However, 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</p>	<p>Justification on Policy H3 (EC043) and the Inspector’s Note in Annex 1 of this document;</p> <ul style="list-style-type: none"> • To avoid placing significant administrative burdens on developers of small sites, as considered within the Post-Hearing Advice (EI014), Additional Justification on Policy H3 (EC043) and the Inspector’s Note in Annex 1 of this document; • To provide some interim guidance on tenure needs in advance of SPD, as discussed in hearings on 28th September.
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			<p>existing use values. Where applicants can demonstrate, to the satisfaction of the Council, exceptional difficulties in bringing a site to market, the Council will be prepared to consider detailed information on the viability of a particular scheme and, where justified through an open book approach, to reduce the affordable housing requirement. The information required will be proportionate to the scale of development, and, where a proposal is for less than 10 dwellings, will be more limited in scope and length. For sites of less than 10 dwellings, a brief schedule of the main elements of the viability calculations, supported by estate agent valuations, will generally suffice. The Affordable Housing SPD, to be revised later in 2019, will contain more detail on information to be submitted. 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. The Council will generally secure provision of affordable housing through a Section 106 agreement.</p> <p>4.4.24 The tenure, size and type of affordable housing provided as part of any scheme should respond to the identified need for affordable housing taking account of the most up-to-date information, including information in an Affordable Housing Supplementary Planning Document or other Supplementary Planning Document. The SPD may need to be updated to take account of any changes to the affordable housing definition, as well as other matters. Taking account of the 2016 SHMA, housing with two or more bedrooms that can house families is a priority. Paragraph 4.4.8 considers this in more depth. New development should therefore include a range and mix of tenures, sizes and types (e.g. house types, flats) of affordable housing (as appropriate depending on site size) to reflect local needs and to 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).</p> <p>4.4.25 At the time of producing the Local Plan, the tenure split below reflects the most up to date position on needs within Reading. However, a revised Affordable Housing SPD, to be produced during 2019, will look at this issue in detail. The needs below are therefore subject to change within the SPD.</p> <ul style="list-style-type: none"> • Social rented or affordable rent housing of no more than target rent - 70% of affordable housing units; and Intermediate and/or shared ownership housing - 30%.” 	
MM20**	78	H4	<i>“Planning permission will be granted for developments of self-contained, private</i>	Changes for the following

		<p><i>rented homes which:</i></p> <ol style="list-style-type: none"> 1. <i>Are secured in single ownership providing solely for the rental market for a minimum <u>30-20</u> year term with provision for clawback of affordable housing contributions should the covenant not be met; and</i> 2. <i>Provide tenancies for private renters for a minimum of three years with a six month break clause in the tenant's favour and structured and limited in-tenancy rent increases agreed in advance; and</i> 3. <i>Provide a high standard of professional on-site management and control of the accommodation; and</i> 4. <i><u>Provide a commitment to high-quality rental arrangements, through meeting Meet Reading Borough Council's <u>voluntary</u> Rent with Confidence Standards <u>or equivalent measures</u>; and</u></i> 5. <i>Provide for a mix of unit sizes in accordance with Policy H2 <u>or CR6</u>; and</i> 6. <i>Meet the standards of design set out in Policy H5; and</i> 7. <i>Provide 30% on-site affordable housing, either in accordance with Policy H3 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document.</i> <p>...</p> <p>4.4.31 The Council will expect rental levels for the affordable housing or Affordable Private Rent housing to be related to Local Housing Allowance rate levels (including service charges) and be affordable for those identified as in need of affordable housing in the Borough. <u>An Affordable Housing SPD, to be produced in 2019, will set out further detail.</u> The Council will expect such housing to remain affordable in perpetuity.</p> <p>4.4.32 That policy acknowledges the need to tie such schemes to providing rental</p>	<p>reasons:</p> <ul style="list-style-type: none"> • To reflect changes highlighted in the Post Hearing Advice for criteria 1 and 4 - the 20-year period reflects the covenant period agreed for Thames Quarter, the only build-to-rent scheme agreed in Reading so far, and is consistent with the proposed changes by Lochailort at Pre-Submission stage; • To incorporate flexibility in criterion 4, as discussed in hearings on 28th September • To respond to a comment by Ropemaker Properties on criterion 5; • To refer to where more detail on tenure will be available in paragraph 4.4.31 as discussed in hearings on 28th September; • To respond to a comment by Stanhope plc on paragraph 4.4.32
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			<p>accommodation for a minimum period of time, particularly where the planning authority has been flexible over affordable housing provision or in the use of the Affordable Private Rent housing. Therefore, where viability assessments show that the full target affordable housing cannot be provided or where the provider proposes the provision of Affordable Private Rent Housing, managed by the owner of the development, the Council will expect the application to agree to a covenant tying the development to providing solely private rented accommodation for a minimum period of 30 years. Where viability testing demonstrates that affordable housing contributions are unviable, clawback mechanisms will be included as part of the planning permission to recoup the loss of affordable housing if any residential units are sold out of single ownership within the covenant period. Comments on assessing viability within policy H3 and its supporting text also apply to schemes under H4. A charge towards the provision of additional affordable housing will be triggered where any private rented homes are sold within the development within <u>30-20</u> years of occupation of the completed development.”</p>	
MM21	80-83	H5, 4.4.36, 4.4.44 and 4.4.45	<p><u>“New build housing should be built to the following standards, unless it can be clearly demonstrated that this would render a development unviable:</u></p> <p>a. All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standard.</p> <p>b. All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations.</p> <p>c. All major new-build residential development should be designed to achieve zero carbon homes.</p> <p>d. All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations.</p> <p>e. All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations where it is viable, unless it is built in line with M4(3) (see below).</p>	<p>Changes for the following reasons:</p> <ul style="list-style-type: none"> • To include flexibility for circumstances where standards render a development unviable, as discussed at hearings on 28th September • To reflect the regulations on the dwellings to which part M4(3) should be applied. • To respond to a comment by Unite Students. • To provide greater clarity on the application of zero carbon homes, as discussed at hearings on 28th September.

		<p>f. <i>On developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. <u>Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'.</u></i></p> <p>4.4.35 The Government has sought to consolidate the wide range of standards required for new housing across the country. The approach has been to rely on minimum requirements in the Building Regulations for most matters, but to set a small number of 'optional' national standards over and above the Building Regulations minima, which local planning authorities can choose to apply in their areas. These 'optional' standards cover internal space, water efficiency and accessibility. Local planning authorities cannot seek any additional, or higher, standards for new housing.</p> <p>4.4.36 These 'optional' standards can only apply where a policy is included in a Local Plan. This policy therefore applies those standards in Reading Borough. It should be noted that the standards are only 'optional' for the local planning authority to apply in their areas, but that once applied, compliance in line with the policy is compulsory. Conditions will be applied to relevant planning permissions to ensure compliance with the policy. For water efficiency and accessibility, the standards will be applied through the Building Regulations. Planning conditions may be required to secure compliance. Where references to the Building Regulations in the policy change, the requirement shall be taken to refer to the most up-to-date standard. Housing in the centre will also need to consider the requirements of policy CR6. <u>These standards apply to residential uses in the C3 use class only.</u>"</p> <p>...</p> <p>Emissions</p> <p>4.4.43 Reading's Climate Change Strategy (Reading Means Business on Climate Change 2013-2020) sets challenging targets for tackling the Borough's contribution to climate change, and aims to reduce Reading's carbon footprint by 34% by 2020 in comparison to 2005 levels. One of the Strategy's strategic principles is that buildings in Reading should be built to high standards of energy efficiency incorporating on-site renewable</p>	
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			<p>energy where possible. Given the scale of residential development in Reading up to 2036, achieving the aims of the Climate Change Strategy will not be possible without that development having a minimal impact on carbon emissions.</p> <p>4.4.44 Therefore, the requirement will be that major new housing is built to zero carbon homes standard. A revised Sustainable Design and Construction SPD to be produced in 2019 will contain more detail on achieving this requirement, but in general, where homes are not designed to be carbon neutral, this will mean as a minimum a 35% improvement in the dwelling emission rate over the 2013 Building Regulations⁸¹ plus a contribution of £1,800 per tonne towards carbon offsetting within Reading (calculated as £60 per tonne over a 30 year period). Where it is proposed to meet the zero carbon homes requirement in another way, clear evidence should be provided to demonstrate how it will be achieved at planning application stage. Zero carbon homes is an achievable standard that, until recently, was intended to be a national requirement in the Building Regulations. All other housing should be built to a level equivalent to the emissions requirement of former Code for Sustainable Homes Level 4, which is a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations. Where the 19% reduction in carbon dioxide emissions cannot be achieved on site, an offset may be possible through planning contributions. Further guidance on such an off-set will follow the Local Plan.</p> <p>Accessibility</p> <p>4.4.45 There are two levels of ‘optional’ standards for accessibility. M4(2) of the Building Regulations is for accessible and adaptable dwellings, and relates to relatively straightforward design measures that can allow homes to be adaptable as the needs of the occupier change. In that sense, it is broadly in the same vein as Lifetime Homes, although not identical. M4(3) relates more specifically to wheelchair user housing. The specific requirements can be seen in the Part M approved document⁸². In terms of part M4(3), Part M distinguishes between ‘wheelchair accessible’ dwellings (which apply only where the Council is responsible for allocating or nominating an individual) and ‘wheelchair adaptable’ dwellings (which can apply to any homes), and the policy therefore reflects this distinction.”</p>	
MM22	94-95	4.4.95-4.4.98	<p>“4.4.95 Reading has a strong student population, drawn by the University of Reading and also by Reading College. This population brings many benefits to the area, in terms of supporting services and facilities, and means a strong supply of well-qualified</p>	<p>To be more precise about existing need for student accommodation and to</p>

		<p>people, many of whom remain in the Borough after graduation and make a major contribution to its economic success. It is important that sufficient accommodation is provided to enable students to live close to where they study. The Council particularly recognises the benefits of purpose-built student accommodation where there is a partnership arrangement with a further or higher education institution and where it offers accommodation that meets the needs of students in terms of facilities, convenience to places of study and in terms of the cost of accommodation.</p> <p>4.4.96 The SHMA (2016) looked at the issue of need for additional student housing. It anticipates a growth in student numbers at the University of Reading from 13,135 in 2015 to 16,095 in 2018. However, the SHMA notes that, as this is in line with historic high student numbers, that it should not result in the need for significant new accommodation. More recent evidence from the University indicates that this growth, underpinned by changes to the tuition fee system and the removal of student number controls, will have indeed generated a need for new accommodation. In 2016/17, 74% of students were from outside the South East, and 28% were from outside the UK, and these groups are particularly reliant on student accommodation. There is current shortfall in University accommodation of around 1,000 bed spaces for first year students and, across all years of study, for 2017/18, 5,000 students were not housed in purpose built student accommodation.</p> <p>4.4.97 It is considered that this existing need should mainly be met on campus or through reconfiguration and redevelopment of existing halls of residence, subject to considerations of amenity and character. The St Patrick's Hall site has been identified in policy ER1e as such a proposed site. Its delivery will help to address the student guarantee (where first year students who have the University as their first choice are guaranteed accommodation). Additional accommodation beyond this will need to demonstrate why it cannot be met on those sites.</p> <p>4.4.978 However, the need for student accommodation is highly dependent on any expansion of the University. Whilst the University's plans for the next five years are clear, the intentions up to 2036 are less so, and there is therefore potential for change in later parts of the plan period. The University has expressed intentions for significant growth in student numbers up to 2028. Where such growth requires planning permission, it will need to be tested against policies OU1 and, depending on location, ER2, to ensure it can be supported by appropriate student accommodation. The need</p>	<p>reflect agreement on changes within the Statement of Common Ground with the University of Reading (EC042), and to clarify why two allocations in the Local Plan do not comply with the locational principle in H12, as discussed in hearings on 28th September.</p>
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			<p>for future expansion of accommodation will therefore need to be kept under review.</p> <p>4.4.989 The provision of new student accommodation needs to be balanced against other types of housing. Whilst it is likely that purpose built student housing, <u>where it is affordable to those students currently in HMOs</u>, can free up some existing homes to meet more general needs, <u>and there is evidence that in those recent years where numbers of students in HMOs have dropped, this has coincided with the opening of large new on-campus student accommodation blocks</u>. However, the Council considers <u>that</u> there are many sites where development for students prevents a potential housing site being used to help to meet the more pressing needs for general housing, including affordable housing. Development for students should therefore be <u>limited to prioritised towards</u> established student locations, unless a specific need for a development in a certain location can be clearly demonstrated.</p> <p><u>4.4.100 This Local Plan identifies two sites (CR13a and ER1a) for student accommodation in locations which do not comply with the above policy. In both cases, there are specific circumstances which justify these allocations. Site ER1a already has planning permission for student accommodation. In the case of CR13a, this includes a listed prison building of considerable historic sensitivity which may be challenging to convert, and the importance of securing a beneficial future use for the building means that the policy must keep the options for possible future uses open.</u>”</p>	
MM23	95	H13	<p>“Proposals should</p> <ul style="list-style-type: none"> i) Meet an identified need for gypsy, traveller or travelling showpeople accommodation within Reading; ii) Have safe and convenient access onto the highway network; iii) Have good access to a range of facilities including education and healthcare by a choice of means of travel, including walking; iiiv) Not have an unacceptable impact on the physical and visual character and quality of the area; iv) Not result in an adverse impact on the significance of a heritage asset; vi) Be located in line with national and local policy on flood risk, and not involve location of caravans in Flood Zone 3; vii) Not have an unacceptable impact on the amenity of existing residents in surrounding areas, or on future residents of the proposal; and viii) Not result in the loss of biodiversity or important trees, and provide a net 	To reflect ‘Planning Policy for Traveller Sites’, as noted in Council’s Response to Issue 7 (EC009)

			<i>biodiversity gain where possible.”</i>	
MM24	96	4.4.100	“In terms of permanent and transit accommodation for gypsies and travellers, the Council has gone through a thorough site assessment process, which culminated in a consultation on gypsy and traveller provision during September and October 2017. The conclusion was that, <u>whilst one site could potentially meet the identified transit needs (which is identified in policy WR4)</u> , there were no sites that could meet the permanent <u>or transit</u> accommodation needs. The Council is exploring with its neighbours whether there are options for meeting <u>this the permanent</u> need outside the Borough, <u>and continues to look for opportunities to make transit provision within Reading</u> . In terms of travelling showpeople, the small need identified is unlikely to be able to support a new site on its own, and therefore any proposal for expansion of the existing site will need to be considered on its merits.”	To reflect removal of policy WR4 (see MM57).
MM25	98	4.5.3	“Major developments (over 10 dwellings or 1,000 sq m of non-residential floorspace <u>or more</u>) can make a particular contribution to achieving the strategy. In these cases, it is important that users of, and visitors to the development can make sustainable travel choices using non-car modes of transport. This should include provision that enables and supports walking, cycling and the use of public transport including from the development.”	To be consistent with definition of major development.
MM26	99	TR2	<i>“Priority will be given to the implementation of the major transport projects identified in the Local Transport Plan (or any successor document) and other identified major transport projects. Land required for these projects will be safeguarded <u>where necessary</u>. These will include: ...”</i>	To make clear that project does not require land safeguarding, as referenced in Council Response to Issue 8 (EC010)
MM27	100	4.5.8	“ Park and Ride: Despite recent new park and ride provision at Mere oak and Winnersh (both in Wokingham Borough), there is a continued need for new provision. Opportunities for new sites will therefore be sought, particularly on the corridors identified on figure 4.8. The constraints of the Borough mean that the sites are most likely to be in adjoining authorities, and the Council will continue to work with its neighbours to bring new facilities forward. <u>A new park and ride is permitted at Thames Valley Park in Wokingham, and the Council has also discussed the potential for park and ride in West Berkshire and South Oxfordshire with the relevant authorities over a number of years, but no sites have yet been formally proposed. Specific proposals will be supported by a business case showing the benefits of the scheme. These p</u> Park and ride <u>sites</u> can complement existing bus services, including inter-urban buses, by supporting their use.”	To refer to discussions that have already taken place, as discussed at hearings on 2 nd October.

MM28*	106	RL2	<p><i>“Retail and main town centre leisure and culture development, where it would mean a net gain of over 2,500 sq m, will take place in, or as an extension to, the centre of Reading, unless it is on a site allocated for such development. Where a need for additional development has been identified, and no sites are available in or adjoining the centre of Reading, <u>or other defined centres</u>, a sequential approach should be adopted to identifying alternative sites.”</i></p>	To respond to a comment by Hermes
MM29	110-112	RL3, 4.6.18 and 4.6.21	<p><i>b) Within district, major local and local centres, development will be permitted provided that:</i></p> <ul style="list-style-type: none"> • <i>There would be no more than 2 consecutive A5 takeaways, and no more than 30% of the length of the Key Frontage would be in takeaway use; and</i> • <i>There would be no net loss of ‘centre uses’ for ‘non-centre uses’ at the ground floor (apart from entrances to upper floors) except in exceptional circumstances. On upper floors, other uses including residential (‘living over the shops’) will be acceptable.</i> <p><i>c) Within and adjacent to district, major local and local centres, all new development should provide some ‘centre uses’ at the ground floor, unless it can be clearly demonstrated that this would not be possible or appropriate.</i></p> <p><u><i>d) Where the Key Frontages within a centre as identified on the Proposals Map are proposed to significantly change, or have already significantly changed, as a result of redevelopment, meaning that criteria a) and b) cannot be applied, proposals should ensure that a strong retail character is retained within the ground floor of the centre, and that ground floor concentrations of consecutive units not in A1 or A2 use, in particular A5 takeaways, are avoided.</i></u></p> <p>...</p> <p>4.6.18 Criterion (b) has two purposes. Firstly, concentrations of takeaways can have a negative effect on the amenity of residents, and can also change the character of the street. Its other purpose is to prevent inappropriate uses, particularly housing, from encroaching on centres at the ground floor and permanently removing shop units or other facilities. Elsewhere in the country, whole centres have been lost in this way. However, it is important that uses such as housing and offices are integrated into centres at upper floors to ensure diversity and good access to jobs and housing. Exceptional circumstances are those where it can be clearly demonstrated that the</p>	To deal with a situation where a major redevelopment within a centre alters the key frontages and means that criteria a) and b) cannot be applied, and to clarify that the requirement is not that a unit must already have been vacant for 5 years, as discussed at hearings on 2 nd October.

			<p>only alternative to loss of the unit to any ‘centre use’ is long-term vacancy (e.g. that it could be expected to be vacant for longer than 5 years).</p> <p>4.6.19 Finally, criterion (c) recognises the fact that opportunities for expansion of these centres are relatively rare, and therefore, where they do occur, they should be seized, in order to enhance the role of centres in serving their local communities.</p> <p>4.6.20 Where the policy includes the term ‘consecutive’ under (a) and (b), this includes where units are separated by the entrance to a side-street or footpath, or any other small gap between buildings.</p> <p>4.6.21 References to ‘key frontage’ in this policy, e.g. for proportion of A1/A2 use, will not be capable of being applied where there is a comprehensive development of a centre, or a part of a centre, that significantly alters the frontages. In such a case, developments need to be judged against other policies, notably RL1 criterion d) of the policy.</p> <p>4.6.22 This policy does not apply to the town centre of Reading. A different approach is required there, which is dealt with in Policy CR7.”</p>	
MM30	115-116	OU1 and 4.7.9	<p>“OU1: NEW AND EXISTING COMMUNITY FACILITIES</p> <p><i>Proposals for new, extended or improved community facilities will be acceptable, particularly where this will involve co-location of facilities on a single site. Proposals for on-site intensification of important facilities, such as schools and healthcare uses, will be supported, subject to other policies in the plan. Proposals for additional development for further and higher education will only be acceptable where it can be demonstrated that it would not lead to a material increase in the need for student accommodation, or that additional students can be housed in-it will be supported by an appropriate increase in existing or planned student accommodation.</i></p> <p>...</p> <p>4.7.8 There are some significant sites in Reading where continued development to help fulfil the site’s role in providing for the community is likely to be needed, for instance Reading College. This will be acceptable, subject to other policies in the plan. Development at the University of Reading Whiteknights Campus in dealt with in policy</p>	To take account of development that would not generate a material need for new accommodation as discussed at hearings on 28 th September and reflected in the Statement of Common Ground with the University of Reading (EC042)

			<p>ER2 and at the Royal Berkshire Hospital in policy ER3.</p> <p>4.7.9 However, it must be recognised that further and higher education expansion can put pressure on the housing market, through students being housed in existing dwellings, or through new student accommodation on sites that could otherwise be used to address the general housing need. Given the scale of the need for new homes in Reading, this must be carefully managed. Therefore, applications for academic development that would bring additional students to live in Reading must lead to a material increase in additional students needing student accommodation should be paired with supported by an corresponding appropriate increase in dedicated existing or planned student accommodation. This should be on existing campuses or existing student accommodation sites, considered in line with policy H12.”</p>	
MM31*	118	OU3	<p><i>“Proposals for telecommunications development will be permitted provided that:</i></p> <ul style="list-style-type: none"> <i>• They do not have an adverse impact on the visual amenity of the surrounding area <u>or on the significance of a heritage asset;</u></i> <i>• The apparatus will be sited and designed so as to minimise its visual impact by the use of innovative design solutions such as lamp column ‘swap-outs’ or concealment/camouflage options; and</i> <i>• Alternative sites and site-sharing options have been fully investigated and it has been demonstrated that no preferable alternative sites are potentially available which would result in a development that would be less visually intrusive.”</i> 	To respond to a comment by Historic England
MM32*	120	4.7.26	<p>“Despite the fact that the policy does not deal specifically with types of advertisements, some types are unlikely to be considered appropriate in terms of how visual amenity and safety is defined in the policy. Freestanding advert panels in urban streets, for instance, can have a significant detrimental effect on views of the streetscene. <u>Bulky box fascia and projecting signs, often crudely attached onto existing fascias, create a poor visual impression and will not generally be acceptable</u> <u>Projecting box-type signs, bulky folded box fascia signs, uprighters and downlighters are also likely to detract from the character of an area.</u> Whole fascia internal illumination should be avoided. <u>Care should be taken to ensure that illumination is in keeping with the character of the area, particularly where it would affect heritage assets, for instance face Face</u> or halo illumination of individual letters is more may be appropriate and discreet slim-line LED downlighters may be acceptable. Advertisements above ground floor level are also likely to have particularly prominent and care should be taken to</p>	To respond to a comment by British Sign and Graphics Association

			avoid detrimental effects on visual amenity.”	
MM33*	129	CR1	“The Central Area boundary as shown on the Proposals Map will mark the edge of the town centre in most cases other than where specified . However, for the purposes of application of the sequential test for main town centre uses, the following definitions as defined on the Proposals Map are used:”	To respond to a comment by K2 Developments
MM34*	131	CR3	“v. The public realm should conserve and enhance the historic environment of the centre and the significance of heritage assets therein and their setting, including through layout, materials, hard and soft landscaping. There may be opportunities for areas of public realm to provide improved access to and visibility for heritage assets.”	To respond to a comment by Historic England
MM35	132	CR4	“The River Thames is a prime location for new or improved non-regionally significant tourist attractions, and as such, this area is suitable for informal recreation and sporting uses and associated small-scale development, as well as improvements to management and access. Development or improvements in this area will be expected to add to or maintain the setting and character of the Thames and to conserve and enhance ecological value.”	To remove wording related to the now-revoked South East Plan, as set out in Council’s Response to Issue 10 (EC012)
MM36*	140	CR10	“• Preserve-Conserve and, where possible, enhance the setting of conservation areas and listed buildings;”	To respond to a comment by Historic England
MM37*	145	CR11a	“CR11a, FRIAR STREET & STATION ROAD: There will be active retail and leisure uses on the ground floor along Friar Street and Station Road, with a mix of uses on higher floors. Development should enhance linkages in a north-south direction to link to the Station Hill area. Listed buildings and their settings in the area will be conserved, and opportunities to improve the environment of Merchants Place will be sought. Site size: 1.36 ha Indicative potential: 150-270 dwellings, no significant net gain in offices, or retail and leisure (no significant net gain assumed)”	To respond to a comment by K2 Developments
MM38*	145	CR11b	“CR11b, GREYFRIARS ROAD CORNER: There will be active retail and leisure uses on the ground floor along Friar Street, with a mix of uses on higher floors and in the rest of the area. The edge of the site nearest to the areas of traditional terracing west of Greyfriars Road will require careful design treatment. Site size: 0.37 ha Indicative potential: 90-140 dwellings, no significant net gain in offices or retail and leisure (no significant net	For consistency with changes to CR11a

			<u>gain assumed)</u> ”	
MM39*	145	CR11c	<p>“CR11c, STATION HILL & FRIARS WALK: <i>This area will be developed for a mix of uses at a high density, including retail and leisure on the ground and lower floors and residential and offices on higher floors. There will be enhanced links through the site, including in a north-south direction into the Station Hill area and through to the station, and a network of streets and spaces. Frontages on key routes through the site should have active uses. The edge of the site nearest to the areas of traditional terracing west of Greyfriars Road will require careful design treatment.</i></p> <p>Site size: 2.87 ha Indicative potential: 380-570 dwellings, 80,000-100,000 sq m of offices, no significant net gain in retail and leisure (<u>no significant net gain assumed)</u>”</p>	For consistency with changes to CR11a
MM40*	146	CR11g	<p>“CR11g, RIVERSIDE: <i>Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from the <u>top of the bank of the river</u>. Development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, with potential for an area of open space at the riverside. The main use of the site should be residential, although some small-scale offices and leisure <u>leisure and complementary offices</u> will also be <u>appropriate-acceptable</u>. <u>Development should take account of mitigation required as a result of a Flood Risk Assessment</u>.</i></p> <p>Site size: 1.24 ha Indicative potential: 250-370 dwellings, 1,000-2,000 sq m of leisure, no significant net gain in offices.”</p>	To respond to comments by SSE Ltd and the Environment Agency
MM41	149	5.4.12	<p>“Parts of the Station/River Major Opportunity Area, particularly north of the railway line, are within both Flood Zones 2 and 3a <u>as shown in the SFRA</u>¹⁰⁹. However, this must be weighed against the vital role that these sites will play in regeneration in the centre. A sequential and exceptions test in line with the NPPF has been carried out in identifying these sites for development, and this will be <u>is</u> available on the Council’s website as background evidence. <u>Where a more detailed assessment at planning applications stage finds that the site falls partly in Flood Zone 3 (e.g. for CR11g or CR11i), flood mitigation measures should be designed to the 1 in 100 year level plus a 35% allowance for climate change, and residual risk should be assessed against the 70% allowance (with both extents shown in the 2017 SFRA)</u>. Individual applications will need to provide their own Flood Risk Assessment. Detailed proposals on these sites will need to consider how the mix of uses is best distributed taking flooding guidance into</p>	To reflect national policy guidance on flood risk as discussed at hearings on 3 rd October.

			account.”	
MM42	150	CR12a	<p>“CR12a, CATTLE MARKET:</p> <p><i>This site will be developed for a mix of edge-of-centre retail uses, and residential development, along with public car parking. The retail may include bulky goods, but should not include a significant element of non-bulky comparison goods retail. It and must be designed to mesh into the urban fabric <u>reflect the urban grid layout and built form of the centre</u> and a single storey retail warehouse will not be permitted. Development should take account of mitigation required as a result of a Flood Risk Assessment.</i></p> <p>Site size: 2.46 ha Indicative potential: 330-490 dwellings, 10,000-15,000 sq m net gain of retail.”</p>	To make it clearer how a decision-maker should respond as discussed at hearings on 3 rd October
MM43	151	CR12b	<p>“CR12b: GREAT KNOLLYS STREET AND WELDALE STREET:</p> <p><i>This area will be developed primarily for residential. Any development which would result in the loss of small business units should seek to replace <u>some as many</u> of those units <u>as possible</u>, preferably on site. There should be a careful transition to the lower density residential areas to the west. Listed buildings and their settings in the area will be conserved and where possible enhanced.</i></p> <p>Site size: 3.02 ha Indicative potential: 280-430<u>510</u> dwellings, no significant net gain of other uses.”</p>	To make it clearer how a decision-maker should respond as discussed at hearings on 3 rd October and to take into account the recent planning permission as set out in Council’s note on dwelling ranges EC021
MM44**	151-153	CR12e and 5.4.17	<p>“CR12e, HOSIER STREET:</p> <p><i>Development on this site will result in a new residential community centred around an improved area of public open space and a high quality environment, with an improved entrance to the site from St Mary’s Butts. The edges of the open space will be activated with retail, leisure and/or other main town centre uses such as hotel use, and development may also include some limited offices uses. The Hexagon theatre will only be developed if a replacement facility for Reading is provided, and approaches to the theatre will be improved. The Hexagon theatre will only be developed if a replacement facility for Reading <u>expected to be in the same area</u>, is provided, and approaches to the theatre will be improved. Development will also include a replacement site for the street market. The car parking below ground level will be retained and incorporated into the development.</i></p> <p>Site size: 3.41 ha Indicative potential: 500-750 dwellings, 4,000-6,000 sq m of retail and leisure.</p>	To provide clarity as referred to in Council Response to Issue 10 (EC012), to respond to a comment by the Theatres Trust and to bring the policy and supporting text into line as discussed in hearings on 3 rd October.

			<p>...</p> <p>5.4.17 In the Hosier Street area, the old civic offices have now been demolished, and the need for replacement of the Hexagon theatre has been recognised for some time. The Hexagon is not suited to modern theatre requirements and is expensive to maintain. The policy <u>proposes-requires that, where the Hexagon site is proposed to be developed, there should be replacement, which is expected to be</u> within the same area. <u>There will need to be liaison with The Theatres Trust on any proposed replacement.</u>”</p>	
MM45	154-157	CR13a and 5.4.28	<p>“CR13a, READING PRISON: <i>The prison building itself is of historical significance and is listed, and its historic significance will be conserved and where possible enhanced. The building would be used for <u>a use compatible with its heritage, which might include residential or student accommodation, commercial offices or a hotel, and should include some cultural or heritage element or related retail and leisure that draws on its significance. The site is part of a scheduled ancient monument, and therefore any additional development will be dependent on a thorough demonstration that it would not have detrimental impacts on the significant archaeological interest. The prison adjoins the Abbey Quarter, and development should therefore enhance that area as a heritage destination.</u></i></p> <p><i>Site size: 1.44 ha Indicative potential: conversion of prison could result in 65-90 dwellings. No figures for additional development, as highly dependent on assessment of archaeology.</i></p> <p>...</p> <p>5.4.28 Figure 5.5 shows the broad strategy for the East Side Major Opportunity Area, which indicates some of the elements that need to be taken into account in developing this area. The Proposals Map gives greater detail on some matters, such as designation of the Major Opportunity Area and Sub-Areas. There are existing Supplementary Planning Documents covering parts of the site. The Reading Prison Framework was recently adopted, and continues to be relevant. Reading Prison is a highly constrained site, and the Framework contains much more detailed information on these issues and how they should be addressed. <u>It is important that options for uses that may secure</u></p>	<p>To ensure that any use of the listed building is compatible with its heritage, and to explain the reason that this is considered an exception to H12, as discussed in hearings on 3rd October as discussed in hearings on 3rd October</p>

			<p>the future of the listed prison building are kept open at this stage, which is why student accommodation remains under consideration in a site that would otherwise be contrary to policy H12. The Kenavon Drive Urban Design Concept Statement also provides useful guidance, but it predates the Local Plan by some years, so where there is any conflict with policy CR13, the Plan policy takes precedence.”</p>	
MM46*	155	CR13b	<p>“CR13b, FORBURY RETAIL PARK: <i>This site would be the focus of the new residential community, and, alongside residential, additional retail, leisure and community uses at a scale to serve the Kenavon Drive area would be appropriate. It should include a new area of open space and enhance the frontage to the canal, including a buffer zone to the top of the canal bank to reflect its wildlife significance. Implementing this policy may involve complete redevelopment or using new additional development to improve the existing urban form of the area. Some parts of the site are likely to be implemented in the long term.</i> <i>Site size: 6.99 ha Indicative potential: 1,230-1,840 dwellings, no net gain of retail.”</i></p>	To respond to a comment by the Environment Agency
MM47	155	CR13c	<p>“CR13c, KENAVON DRIVE & FORBURY BUSINESS PARK: <i>This site would be largely residential in nature, although opportunities to create an area of open space close to the Kennet should be sought. Development will link into the newly-opened pedestrian link under the railway to Napier Road.</i> <i>Site size: 2.07 ha Indicative potential: 130-190190-285 dwellings.”</i></p>	To take into account potential to accommodate more dwellings as set out in Council’s note on dwelling ranges EC021
MM48**	155	CR13d	<p>“CR13d, GAS HOLDER: <i>This area will be used for residential development. Development should enhance the character of the mouth of the Kennet and should maximise the potential of the site to be a river gateway to Reading. Public access along the river to the Kennet Mouth will be sought. Development should be set back at least ten metres from the top of the bank of the river and allow for a wildlife corridor along the river to reflect its wildlife significance. Development should take account of potential contamination on the site.</i> <i>Site size: 0.71 ha Indicative potential: 46-70 dwellings.”</i></p>	To respond to comments by SGN and Danescroft and the Environment Agency, to bring into line with CR13b, and to reflect discussion at hearings on 3 rd October.
MM49	161	CR14m	<p>“CR14m CAVERSHAM LOCK ISLAND AND CAVERSHAM WEIR, THAMES SIDE <i>Development for water-compatible leisure or tourism uses, including some operational development. Potential for Proposals including enhanced pedestrian access and/or Potential use of weir for generation of hydropower will be</i></p>	To make it clear how a decision-maker should respond as discussed in hearings on 3 rd October

			<p><u>acceptable.</u></p> <p><i>Development should:</i></p> <ul style="list-style-type: none"> • Address flood risk issues; • Retain important trees on site; • Avoid harm to the setting of the listed Kings Meadow pool; • Take account of potential archaeological significance; • Avoid a detrimental impact on the biodiversity value of the River Thames, and set buildings back at least ten metres from the top of the bank of the river; Retain public access across the site; and • Not impact on the operation of the lock and weir. <p><i>Site size: 0.5 ha Indicative potential: 900-1,100 sq m of leisure use.”</i></p>	
MM50	161	5.3.34	<p>“Where there are significant issues that will need to be addressed in any planning applications on the specific sites listed above, these are usually highlighted in the policy, <u>and usually correspond to other policies in the Local Plan, such as EN1, EN2, or EN11-18, where more detail is set out.</u> However, it is not a guarantee that there are no other potential issues, and it does not remove the need to address the usual matters that should be dealt with on all sites.”</p>	To provide further direction on how the criteria in site allocations should be applied, as discussed in hearings on 5 th October.
MM51*	164	CR16	<p>“<i>The area east of Station Road and north of Friar Street, as shown on the Proposals Map, makes a positive contribution to the character of the town centre. The character of the <u>retail units in the Harris Arcade and the buildings fronting the streets overall Station Road and Friar Street frontages will be conserved maintained</u> and, where possible, enhanced. Whilst there will be <u>There is</u> potential for some conversion of buildings and, potentially, some development within the site that does not detrimentally affect its overall character. <u>However,</u> proposals for wholesale redevelopment <u>that would detrimentally affect the overall character</u> will not be supported.”</i></p>	To respond to a comment by LaSalle Investment Management
MM52*	170	SR1a	<p>“SR1a, FORMER LANDFILL, ISLAND ROAD:</p> <p><i>The former landfill site will be developed for warehouse uses with some potential for industrial uses where it would not cause detrimental impacts to existing or planned residential. Development on past landfilled areas will need to demonstrate that it will not cause any negative effects on human health or on the wider environment. The noisiest elements of the development should be located away from any existing or planned residential, in particular residential at Green Park to the south, and development should include an adequate landscaped buffer</i></p>	To respond to comments by the Environment Agency and Roxhill Developments Ltd

			<p>to residential to ensure that there are no significant adverse effects through noise and disturbance, and a 10m undeveloped buffer to the top of the bank of the watercourse to the east. Development should have regard to the development of the whole site and access should be considered as a comprehensive whole.</p> <p>Site size: 32.13 ha Indicative potential: 95,000-116,000 sq m of industrial/warehouse use”</p>	
MM53*	177	SR4e and SR4f	<p>“SR4e PART OF FORMER BERKSHIRE BREWERY SITE PART OF FORMER BERKSHIRE BREWERY SITE</p> <p><i>Development for employment uses. The site has an existing permission for 33,910 sq m of offices, but would also be suitable for industrial and warehouse development. Related commercial uses as part of the mix may also be appropriate, although proposals that would involve main town centre uses (excluding offices) will only be appropriate where there is no significant adverse impact on existing centres.</i></p> <p>Development should:</p> <ul style="list-style-type: none"> • Enhance the setting of the listed Little Lea Farmhouse; • Provide for a green link along the A33 frontage; • Include a landscaped buffer to the watercourses around the site, with development set back at least 10m from the top of the bank of the river wherever possible; • Address any contamination on site; • Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required; and • Safeguard land which is required for mass rapid transit routes and stops. <p>Site size: 3.7 ha 11,000-13,000 sq m of industrial and warehousing</p> <p>SR4f LAND SOUTH WEST OF JUNCTION 11 OF THE M4 LAND SOUTH WEST OF JUNCTION 11 OF THE M4</p> <p><i>This land may be required for uses associated with any major development around Grazeley if identified in plans of Wokingham Borough Council and West Berkshire District Council. The form of any development, if identified, is yet to be determined, and therefore no further details can be set out in this policy. Any development will take account of potential archaeological significance and will need to ensure a 10m ecological buffer to the top of the bank of the watercourse.</i></p>	To respond to a comment by the Environment Agency

			Site size: 3.84 ha No figures for development capacity”	
MM54	178, 193, 200- 201, 209- 210	6.3.15, 7.3.14, 8.3.3, 9.3.3	<p><i>Change the wording in each of the four paragraphs as follows:</i></p> <p>“Where there are significant issues that will need to be addressed in any planning applications on the specific sites listed above, these are usually highlighted in the policy, <u>and usually correspond to other policies in the Local Plan, such as EN1, EN2, or EN11-18, where more detail is set out.</u> However, it is not a guarantee that there are no other potential issues, and it does not remove the need to address the usual matters that should be dealt with on all sites.”</p>	To provide further direction on how the criteria in site allocations should be applied, as discussed in hearings on 5 th October.
MM55*	180	SR5 and 6.3.20	<p><i>“Use of the areas around the River Kennet for low-intensity leisure and recreation will be supported. The following sites in particular offer opportunities to enhance recreation and leisure provision:</i></p> <ul style="list-style-type: none"> • <i>Former laboratory and fish farm, Fobney Mead</i> • <i>Land north and east of Rose Kiln Lane</i> <p><i>These sites are located wholly or partly in the functional floodplain, and parts of the site and surrounding areas have strong significance for biodiversity. As such, the uses supported by this policy would be low-intensity in nature, with any built development of limited scale, and, within the functional floodplain, water-compatible.</i></p> <p><i>Any proposals will need to demonstrate that there will be no adverse impacts on biodiversity, flood risk, landscape, public foot and cycle access along the river <u>and</u>, the operation and condition of the river <u>and the operation of the adjacent Water Treatment Works.</u> If a proposal results in additional use of the Kennet by boats, it should not have an adverse effect on the River Kennet Site of Special Scientific Interest further upstream.</i></p> <p>6.3.19 With an increasing residential population in South Reading, as well as in other parts of the Borough, there is an opportunity to use the considerable asset of the River Kennet as a recreational resource to which these new residents have good access. However, these areas are heavily constrained by flood risk, biodiversity and landscape considerations, which means that an allocation for significant built leisure development cannot be made.</p>	To respond to a comment by Thames Water

			<p>6.3.20 This allocation is therefore limited to low-intensity uses, where built development is limited. A marina is a potential use, and the area north and east of Rose Kiln Lane was in the past identified for such a use. Other possible uses include visitor facilities (where appropriate to the flood risk designation) and accessible open spaces. The policy does not identify the sites for more intensive built leisure uses. Such uses would not be in line with national policy were they to be located within the functional flood plain, and additionally would need to pass other policy tests such as the sequential test for main town centre uses. Thames Water should be contacted at the earliest opportunity to discuss any potential proposal that would affect the Water Treatment Works.”</p>	
MM56*	185	WR2	<p><i>“The existing Park Lane Primary School and associated playing fields, hard play areas, car parking and associated facilities will be reprovided on a single extended site at The Laurels, School Road, Tilehurst, which will include a replacement early years provision, library and health clinic.”</i></p>	To respond to a comment by Jenny Cottee
MM57	194-195	WR4	<p>“Potential Traveller Transit Site at Cow Lane</p> <p>WR4: POTENTIAL TRAVELLER TRANSIT SITE AT COW LANE</p> <p><i>This site has been identified as having potential for transit accommodation for travellers. This will continue to be explored by the Council. Any proposed development for transit accommodation should:</i></p> <ul style="list-style-type: none"> • <i>At a minimum, provide five transit pitches, with each pitch capable of accommodating two caravans;</i> • <i>Ensure that pitches are available to rent on a temporary basis only;</i> • <i>Include access to the highway network that does not detrimentally affect the use of existing vehicular routes or public rights of way;</i> • <i>Not have significant adverse effects on existing operations, in particular the Reading Festival;</i> • <i>Not cause adverse effects on the local area in terms of public amenity and safety;</i> • <i>Take account of the potential for flooding, including avoiding any location of</i> 	The Council is no longer proposing this development, as referenced in Council’s Response to Initial Comments and Questions (EC001). This is because the site is essential to the Reading Festival, and is also proposed to be part of a new secondary school.

			<p><i>caravans within the small areas of the site in Flood Zone 3; and</i></p> <ul style="list-style-type: none"> <i>Be provided with a strong landscaped buffer to open spaces, commercial sites and the Richfield Avenue frontage.</i> <p>7.3.19 The need for transit accommodation for gypsies and travellers in Reading is highlighted in relation to policy H13 of this plan. A rise in the number of illegal encampments in Reading and the Thames Valley area over recent years has brought the issue of traveller accommodation into sharper focus. The provision of a transit site within Reading would enable the police to make use of powers under Section 62a to e of the Criminal Justice and Public Order Act 1994.</p> <p>7.3.20 The Cow Lane site emerged from a thorough assessment of the potential for provision for gypsies and travellers in the Borough. The site is in Council ownership, and is considered to be the only location in Reading where transit needs could potentially be met. More detailed consideration of the potential of the site, including the likely costs, will be needed before any detailed proposal can be made.</p> <p>7.3.21 It should be noted that there are existing commercial operations that could be affected. In particular, the site is currently used as part of the Reading Festival site, which takes place annually in August. The Festival is a major asset to the town, and any proposal will need to ensure that the ability of the Festival to operate will not be threatened.”</p>	
MM58**	198	CA1a	<p>“CA1a READING UNIVERSITY BOAT CLUB, THAMES PROMENADE</p> <p><u>Development for residential, subject to relocation of the boat club. Where retention of the existing boathouse is not proposed, development will only be permitted subject to its relocation or clear demonstration that its loss is justified in line with policy RL6 or national policy.</u></p> <p>Development should:</p> <ul style="list-style-type: none"> Avoid detrimental visual effects on the Thames Valley major landscape feature; Take account of the risk of flooding, and locate development only in the portion of the site in Flood Zone 2, closest to Abbotsmead Road; Provide for a green link across the site from Christchurch Meadows to Abbotsmead Road; and 	To allow for retention of the Boat Club, as proposed in the University of Reading’s Response to Issue 13 (EP030) and Statement of Common Ground with the University of Reading (EC042), and to respond to a comment by University of Reading

			<ul style="list-style-type: none"> • Take account of potential archaeological significance, and be supported by a desk-based archaeological assessment which should inform the development. <p>Site size: 0.56 ha 16-25 dwellings”</p>	
MM59	199-200	CA1b	<p>“CA1b PART OF READING GOLF COURSE, KIDMORE END ROAD:</p> <p>Development for residential and replacement clubhouse, subject to <u>additional land in South Oxfordshire being secured for replacement holes the future provision of golf on the remainder of the Golf Club site, which fulfils an important sports and leisure function for Reading, being secured</u>. On-site facilities should be provided to mitigate impacts on community infrastructure, <u>for instance including</u> for healthcare. On-site public open space will be provided.</p> <p>Development should:</p> <ul style="list-style-type: none"> • Avoid adverse effects on important trees including those protected by TPO; • Provide a green link across the site from Kidmore End Road to the remainder of the golf course, rich in plant species and habitat opportunities; • <u>Ensure that vehicular access is provided from suitable roads to the area to be retained for golf;</u> • Take measures to mitigate impacts on the highway network, particularly on Kidmore End Road <u>and Tanners Lane;</u> • <u>Include all parking requirements within the site to avoid exacerbating parking issues on existing streets;</u> • Take account of potential archaeological significance; and • Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required. <p>Site size: 3.75 ha 90-130 dwellings, community provision including healthcare and replacement clubhouse”</p> <p>Add new paragraph and renumber subsequent paragraphs:</p> <p>“8.3.2 Residential development on the part of the Reading Golf Club site identified as CA1b is dependent on ensuring the future use of the remaining land for golf, in line with the need to protect important sports and leisure facilities set out in Policy RL6. Development will need to be careful to ensure that vehicular access from suitable roads continues to be provided to the remaining golf uses to ensure that they remain operable. A legal agreement will be necessary to ensure</p>	To include greater flexibility as set out in the Council’s Comments on Submission by Wates Developments Ltd and Reading Golf Club (EP045), and to reflect the Inspector’s comments in the Post Hearing Advice.

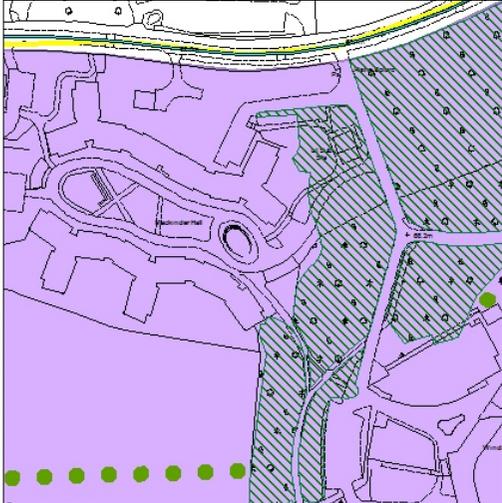
			that the golf function is retained, and development for residential will not take place until a replacement clubhouse is provided and vehicular access from suitable roads is in place.	
MM60**	199	CA1d	<p>“CA1d REAR OF 200-214 HENLEY ROAD, 12-24 ALL HALLOWS ROAD & 4, 7 & 8 COPSE AVENUE</p> <p>Development for residential.</p> <p>Development should:</p> <ul style="list-style-type: none"> • Be accessed from Overton Drive; • Be designed to retain important trees and groups of trees, and avoid adverse effects on important trees including that protected by TPO; • Avoid a net loss of biodiversity, and provide for a net gain where possible; • Provide for a green link across along the eastern boundary of the site adjoining the gardens of Copse Avenue from the copse to the north of the site southwards; • Take account of potential archaeological significance; • Address air quality impacts on residential use relating to the southern portion of the site; • Address any contamination on site; and • Ensure appropriate back-to-back separation from existing residential. <p>Site size: 0.87 ha 17-25 dwellings”</p>	To avoid prescriptiveness about the location of the green link as discussed in hearings on 4 th October, and to respond to a comment by TA Fisher.
MM61*	200	CA1f	<p>“REAR OF 1 & 3 WOODCOTE ROAD AND 21 ST PETER’S HILL</p> <p>Development for residential.</p> <p>Development should:</p> <ul style="list-style-type: none"> • Be accessed from Symeon Place; • Retain established trees and vegetation around the edge of the site; • Avoid a net loss of biodiversity, and provide for a net gain where possible; Take account of the high potential archaeological significance and be supported by assessment work which should inform the development; • Address air quality impacts on residential use; and • Ensure appropriate back-to-back separation from existing residential. <p>Site size: 0.33 ha 8-12 dwellings”</p>	To respond to a comment by Historic England
MM62**	201-202	CA2	<p>“Caversham Park and Caversham Park House are key features of the heritage and landscape of Reading. Caversham Park is a Registered Historic Park and Garden,</p>	To respond to a comment by the BBC; to reflect

			<p><i>and the site contains a number of listed features. These assets will be conserved.</i></p> <p><i>Conversion of the house from offices to residential and/or a cultural, community or heritage use, <u>or other suitable use compatible with its heritage</u>, will be acceptable if it sustains the significance of the listed building. It is <u>currently</u> estimated that up to 40-45 dwellings could be accommodated, but the figure will be dependent on more detailed historic assessment of the building and the precise mix of uses.</i></p> <p><i>Any development or conversion proposals should open as much of the park as possible up to public access, including reinstatement of <u>any</u> historic public footpaths <u>where possible and appropriate</u>.</i></p> <p><i>This policy does not allocate the site for additional development over and above conversion of the house. There may be scope for some limited development on previously developed land within the site, which will need to be justified at application stage. Such development must comply with the criteria below:</i></p> <ul style="list-style-type: none"> <i>• No development will <u>harm the historic interest negatively affect the significance of heritage assets and their setting</u>;</i> <i>• <u>Development will not detract from the character or appearance of or the important landscape value of the site</u>; and</i> <i>• Development will not <u>detrimentally negatively</u> affect <u>protected significant trees or areas of biodiversity importance</u>.”</i> 	<p>uncertainty about the existence of past historic public footpaths and their suitability as discussed at hearings on 4th October and agreed with the BBC; and to bring the criteria into line with the wording of the equivalent policies EN1, EN12, EN13 and EN14 as discussed at hearings on 4th October.</p>
MM63	205	9.2.7	<p>“The University of Reading is a vital part of Reading’s economy and life, and there will continue to be a need for development to support that role at its main Whiteknights campus, as well as its secondary campus at London Road. This development will be supported, where it does not result in significant adverse effects. However, there is clearly an issue around accommodating students in the area, with many of existing homes in the area now occupied by students, and therefore concerns about various possible effects such as noise, parking and the sustainability of local services with less accommodation available for families. For this reason, an increase of purpose-built student accommodation is needed, but this <u>Council considers that first priority</u> should <u>preferably</u> be on the existing university sites, both to reduce the need to travel, particularly by car, and so that key sites elsewhere deliver much-needed general housing rather than student accommodation. The Whiteknights campus crosses the</p>	<p>To indicate the relationship between University growth and student accommodation as agreed in the Statement of Common Ground with the University of Reading (EC042)</p>

			boundary with Wokingham, and it is important that policy across the site is consistent.”	
MM64	207	ER1c	<p>“ER1c LAND REAR OF 8-26 REDLANDS ROAD</p> <p><i>Development for residential, <u>with potential for student accommodation or university uses reflecting the existing student accommodation use on the northern part of the site.</u></i></p> <p>Development should:</p> <ul style="list-style-type: none"> • <i>Make a positive contribution to the conservation area and to the setting of adjacent listed buildings;</i> • <i>Take account of potential archaeological significance;</i> • <i>Retain the wall fronting Morgan Road; and</i> • <i>Retain mature trees on the site and provide for a north-south green link, which will reduce the amount of the site that can be developed and will particularly limit development behind 14-24 Redlands Road.</i> <p>Site size: 0.74 ha 12-1820 dwellings”</p>	To reflect the potential for continuing use associated with the University as agreed in the Statement of Common Ground with the University of Reading (EC042)
MM65	211-212	ER2 and 9.3.10	<p>“The University of Reading is a national and international educational establishment of strategic importance which will continue to adapt and expand over the plan period. The Whiteknights Campus as shown on the Proposals Map will continue to be a focus for development associated with the University of Reading. Such development may include additional staff, teaching, research and enterprise accommodation, infrastructure and services, and sports and leisure facilities among other uses. Access to and within the site will be improved where necessary.</p> <p>Where development would result in <u>the a material</u> need for additional students to be housed <u>in Reading</u>, it should be supported by an <u>appropriate-corresponding</u> increase in <u>existing or planned</u> student accommodation. Provision of new student accommodation on the Whiteknights Campus, or as a reconfiguration or extension of nearby dedicated accommodation, will therefore be acceptable subject to other policies in the Plan.</p> <p>Development will accord with the following criteria:</p> <ul style="list-style-type: none"> • <i>Areas of wildlife significance and current or potential green links will be retained or enhanced, and not detrimentally affected by development, including through light effects;</i> 	To bring the policy into line with the wording of OU1 as discussed at hearings on 5 th October, and to indicate the need for student accommodation, as agreed in the Statement of Common Ground with the University of Reading.

		<ul style="list-style-type: none"> • <i>The safety of those using the campus will be maintained or enhanced;</i> • <i>There will be no significant detrimental impact on the amenity of neighbouring residential properties; and</i> • <i>The loss of undeveloped areas on the site will be weighed against the benefits of development to the wider community.</i> <p>...</p> <p>9.3.10 In 2008, the University drew up a Whiteknights Campus Development Plan, which set out the University's principles for future development of the site, including providing 1,297 additional bedspaces, waste and catering facilities and changes to the accesses and internal circulation. The Development Plan does not form part of the Council's strategy, but it outlines the changes that are proposed to occur on the site in the coming years, and has informed this policy. Much of the development proposed in that plan has now been built out, but there remains the likelihood of further development over the plan period, <u>including for student accommodation as a result of a growth in student numbers of 28% between 2007/8 and 2016/17, together with any additional growth over the plan period.</u>"</p>	
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<p>MM66*</p>	<p>Map A</p>	<p>Proposals Map</p>	<p><i>Change boundaries of site CA1d Rear of 200-214 Henley Road, 12-24 All Hallows Road and 4, 7 and 8 Copse Avenue.</i></p> <p><i>Boundaries before change:</i> <i>Boundaries after change:</i></p> 	<p>To respond to a comment by TA Fisher</p>
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<p>MM67</p>	<p>Map F</p>	<p>Proposals Map</p>	<p><i>Change boundaries of areas of biodiversity significance to reflect actual location of woodland.</i></p> <p><i>Areas before change:</i></p>  <p><i>Areas after change:</i></p> 	<p>To reflect the fact that a small area immediately east of Mackinder Hall is not covered by woodland, as discussed at hearings on 5th October.</p>
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ANNEX 1: Note from Inspector (received 10th May 2019)

Response on EC043 Additional Justification on Policy H3 – Main Modifications required

- Viability - agree with general principle of the proposed amendments to paragraph 4.4.23. However, additional information should be provided which provides further clarification of the approach that will be taken in the SPD for viability assessments for sites below 10 dwellings. 'focussed information' in the proposed wording is not sufficiently clear and could be open to interpretation. The MM could usefully incorporate the wording from para 7.1 of EC043 that explains the Council's pragmatic approach and expand on what types of information may be acceptable to be submitted (for example as described in para 7.4) with confirmation that further detail is to be provided in the SPD.
- In respect of the proposed MM for on-site provision for 5-9 dwellings having regard to the evidence provided in EC043 and during the examination - the requirement for 5-9 dwellings to make on-site provision should be removed from Policy H3, and replaced with a requirement for 20% equivalent in the form of a financial contribution with the wording as for sites of 1-4 dwellings (and the MM to incorporate any consequential changes).

Louise Gibbons
Inspector

SUSTAINABILITY APPRAISAL OF MAIN MODIFICATIONS

JUNE 2019

INTRODUCTION

The Council are currently consulting on a number of main modifications to the Local Plan, which have been identified as being required by the Inspector. It is important to consider the extent to which these main modifications would affect the way in which the Sustainability Appraisal under the Planning and Compulsory Purchase Act 2004 was carried out, and if necessary appraise the changes.

A Sustainability Appraisal assesses the environmental, economic and social effects of plans and proposals, by appraising them against a set of sustainability objectives. Reading Borough Council's 20 sustainability objectives are set out below, and these come from the Revised Sustainability Appraisal Scoping Report, published in 2014.

Sustainability Objectives (2014)	
Living within Environmental Limits (Environmental Objectives)	
1	To limit the impact of climate change through minimising CO ₂ emissions and other greenhouse gases.
2	Adapt to inevitable climate change in terms of preparedness for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.
3	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.
4	Minimise the consumption of, and reduce damage to, undeveloped land.
5	Minimise the generation of waste and promote more sustainable approaches to waste management.
6	Minimise air, water, soil/ground and noise pollution, and improve existing areas of contaminated land and poor air and water quality.
7	Value, protect and enhance the amount and diversity of wildlife, habitat and geology, and other contributors to natural diversity, including establishing/enhancing ecological networks, including watercourses and surrounding corridors.
8	Avoid contributing towards a likely significant effect, either alone or in combination with other plans and projects that could lead to an adverse effect on the integrity of internationally-designated wildlife sites.
9	Create, enhance and maintain attractive and clean environments including protecting and, where appropriate, enhancing landscape and townscape character.
10	Value, protect and, where possible, enhance the historic environment and the heritage assets therein and the contribution that they make to society and the environment.
Ensuring a Strong, Healthy and Just Society (Social & Economic Objectives)	
11	Protect, promote and improve human health, safety and well-being including through healthy lifestyles.
12	Promote strong and vibrant communities through reduction in crime and the fear of crime and enhanced community cohesion.

13	Ensure high quality housing of a type and cost appropriate to the needs of the area.
14	Reduce the need for travel and transport particularly by car or lorry and facilitate sustainable travel choices.
15	Ensure good physical access for all to essential services and facilities, including healthcare.
16	Avoid significant negative effects on groups or individuals with regard to race, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex or sexual orientation.
17	Value, protect and enhance opportunities for all to engage in culture, leisure and physical and recreational activity, particularly in areas of open space and waterspace.
18	Facilitate sustainable economic growth and regeneration that provides employment opportunities for all and supports a successful, competitive and balanced local economy that meets the needs of the area.
19	Reduce deprivation and inequality within and between communities.
20	Maximise access for all to the necessary education, skills and knowledge to play a full role in society and support the sustainable growth of the local economy.

The last full Sustainability Appraisal of the Local Plan was the appraisal of the Pre-Submission Draft in November 2017. This document therefore considers each change in turn and asks whether the main modification would affect the way in which that policy or proposal was appraised. If so, the revised appraisal is shown in tracked changes format.

NEED FOR SUSTAINABILITY APPRAISAL OF MAIN MODIFICATIONS

MM1: Wording changes to CC1: Presumption in Favour of Sustainable Development

This change is intended to take account of the 2018 National Planning Policy Framework, and, whilst the wording is different to reflect the 2018 NPPF, the changes do not change how the policy would operate. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM2: Wording changes to Paragraph 4.1.5

This change refers to a forthcoming SPD. Because the SPD will not establish new policy, but simply provide further detail for implementation, it does not change how the policy would operate. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-submission Draft Local Plan.

MM3: Wording changes to CC3 and Paragraph 4.1.6

This change refers to a forthcoming SPD, and slightly amend the wording to ensure flexibility. Because the SPD will not establish new policy, but simply provide further detail for implementation and ensure sufficient flexibility, it does not change how the policy would operate. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-submission Draft Local Plan.

MM4: Deletion of reference to Combined Heat and Power in CC4: Decentralised Energy, as well as in supporting text 4.1.12 - 4.1.18

This change removes specific reference to Combined Heat and Power (CHP). Because CHP represents just one form of decentralised energy provision, removal of this reference will not change the way in which the policy operates. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-submission Draft Local Plan.

MM5: Changes to CC9 and 4.1.50

A change is required, as follow:

CC9: SECURING INFRASTRUCTURE

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
CC9(i) *	No policy	X	0	X	X	0	X	X	0	X	0	X	X	XX	X	X	0	X	XX	0	X
CC9(ii) ▼	Continue with existing infrastructure priorities (SDPD DM3, Core Strategy CS9, CS13, CS32)	✓	0	✓	✓	0	✓	✓	0	✓	0	✓	✓	✓✓	✓	✓	0	✓	✓✓	0	✓
CC9 (iii)	Continue with existing infrastructure approach, but do not require employment development to contribute to affordable housing needs	✓	0	✓	✓	0	✓	✓	0	✓	0	✓	✓	XX	✓	✓	0	✓	✓X	0	✓
CC9 (iv)	New policy with additional priorities	?✓	0	?✓	?✓	0	?✓	?✓	0	?✓	0	?X	?✓	?X	?X	?X	0	?✓	?X	0	?X

COMMENTS:

CC9(i): No policy

The omission of an infrastructure policy would fail to deliver the infrastructure needed to support growth throughout the plan period. Without a policy, there will be negative effects with regard to most sustainability objectives, including CO₂ emissions (1), natural resource use (3), use of undeveloped land

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
There are not expected to be any differential effects on internationally-designated wildlife sites from any of the policy options.																					
<u>Equality issues</u>																					
There are not expected to be any differential effects on individuals or different groups from any of the policy options.																					
MITIGATION: The proposed option has identified negative impacts in terms of housing and the economy as a result of not providing affordable housing. This can be mitigated to some extent by provision of additional housing, potentially on-site, as set out in policy EM1.																					

MM6: Additional wording added to EN1: Protection and enhancement of the historic environment

This change provides further detail to closely align the policy with guidance from Historic England. It does not change the meaning of the policy in that the existing policy would have been expected to conserve the significance of listed buildings and historic parks and gardens, but will make it clearer for decision-makers. As such, there is no change from the assessment of the Sustainability Appraisal of the Pre-Submission Draft.

MM7: Additional wording added to EN2: Areas of archaeological significance

This change provides further detail to closely align the policy with guidance from Historic England. It does not change the meaning of the policy, but will make it clearer for decision-makers. As such, there is no change from the assessment of the Sustainability Appraisal of the Pre-Submission Draft.

MM8: Additional wording added to Paragraph 4.2.25

This change provides further clarity to describe how the policy is supposed to operate in terms of the distinction between Public Open Space and Local Green Space. It does not change the meaning of the policy, but will make it clearer for decision-makers. As such, there is no change from the assessment of the Sustainability Appraisal of the Pre-Submission Draft.

MM9: Additional wording added to EN12: Biodiversity and the Green Network

This change clarifies that only negative effects (not any effects, or positive effects) would provide a reason for refusal. This does not change the meaning of the policy, but more clearly reflects its original intent. Therefore, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM10: Additional wording added to Paragraph 4.2.65

This change clarifies that Landscape and Visual Impact Assessments (LVIAs) should only apply to Areas of Natural Beauty (AONBs). This does not change the meaning of the policy, but more clearly reflects its original intent. Therefore, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM11: Additional wording added to Paragraph 4.2.67 - 4.2.68

This change simply clarifies the importance of Ancient Woodland and veteran trees, and more clearly describes the circumstances in which off-site tree planting may be acceptable. This does not change the meaning of the policy. Therefore, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM12: Additional wording added to Paragraphs 4.2.79 - 4.2.82

This change to the supporting text does not change the operation of the policy, but makes it clear that air quality may be an issue both within and outside the AQMA. It provides further clarity for applicants on where and when an Air Quality Assessment will be required. As such, there is no change in the Sustainability Appraisal of the Pre-Submission Draft.

MM13: Correction of error in EN17: Noise-generating equipment

This change remedies a minor wording error. It does not change the meaning of the policy and as such, there is no change in the Sustainability Appraisal of the Pre-Submission Draft.

MM14: Insertion of new paragraph following Paragraph 4.2.99

This change further clarifies the identification of functional floodplain. It does not change the policy. As such, there is no change in the Sustainability Appraisal of the Pre-Submission Draft.

MM15: Additional wording added to EM3: Loss of employment land, 4.3.6 and 4.3.7

A change is required, as follow:

EM1: PROVISION OF EMPLOYMENT DEVELOPMENT

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
EM1(i) *	No policy	0	0	0	?X	0	X	0	X	?X	0	0	0	?X	0	0	0	0	XX	0	0
EM1(ii)	Provision based on Scenario 1: Labour Demand	0	0	0	?✓	0	0	0	0	?✓	0	0	0	?✓	0	0	0	0	?✓	0	0
EM1(iii)	Provision based on Scenario 2: Past Completion Rates	0	0	0	0	0	0	0	0	0	0	0	0	?✓	0	0	0	0	X	0	0
EM1(iv)	Provision based on Scenario 3: Labour Supply + safety margin, no reference to affordable housing contributions	0	0	0	?✓	0	0	0	0	?✓	0	0	0	XX	0	0	0	0	✓X	0	0

COMMENTS:
EM1(i): No policy
 A ‘no policy’ option would fail to plan for economic growth and employment (18), bringing significant negative effects. Undeveloped land (4), landscape and townscape character (9) and housing provision (13) would see a tendency towards negative effects. Without a plan to allocate specific levels and

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
<p>MITIGATION: The proposed option has identified negative impacts in terms of housing and the economy as a result of not providing affordable housing. This can be mitigated to some extent by provision of additional housing, potentially on-site, as set out in policy EM1.</p>																					

MM16: Edits to wording of EM3: Loss of employment land and 4.3.13

These changes mean that reference to the five year period is now in the supporting text, and offer some further clarification, but do not change how the policy would operate. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM17: New housing provision figures

A wholly new set of housing figures requires this additional option to be appraised, as follows:

H1: PROVISION OF HOUSING

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
H1(i) *	No policy	0	0	0	?	0	0	0	0	X	0	0	0	XX	X	0	0	0	X	0	0
H1(ii)	Provide 671 dwellings per annum	✓X	0	✓X	?✓	✓X	✓X	?	0	?	?	0	0	✓✓	?✓	?X	0	0	?✓	0	?X

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
H1(iii) ▼	Provide less than the 671 dwellings per annum	✓X	0	✓X	?✓	✓X	✓X	?✓	0	?	?	0	0	?X	?✓	?X	0	0	?X	0	?X
H1(iv)	Provide 699 dwellings per annum as identified in the SHMA	✓X	0	✓X	?X	✓X	✓X	?X	0	?X	?X	0	0	✓✓	?X	?X	0	0	?	0	?X
H1(v)	Provide significantly more than 699 homes each year (in order to further significantly boost housing and deliver higher levels of affordable housing)	✓X	X	✓X	X	✓X	✓X	X	0	X	X	0	0	✓✓	X	X	0	0	?	✓	X
H1(vi)	Provide 689 dwellings per annum	✓X	0	✓X	?✓	✓X	✓X	?	0	?	?	0	0	✓✓	?✓	?X	0	0	?✓	0	?X

COMMENTS:**H1(i): No policy**

A 'no policy' option would fail to provide the amount of housing needed within the Borough. This would render the plan unsound and bring many negative effects. Effects on undeveloped land (4) are unclear. Townscape and landscape (9) could suffer if too many or too few homes were constructed within the Borough, since appropriate densities and mixed-uses contribute to an attractive environment. Sustainable transport (14) would also see negative effects if too many or too few houses were built to meet the required densities to support transport or overwhelm the transport system. Employment (18) would also be negatively affected if too few residential dwellings were available. This would constrain the labour supply. Housing provision (13) would see very significant negative effects.

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
	<u>H1(ii): Provide 671 dwellings per annum</u>	<p>This option considers the objectively assessed housing need resulting from the SHMA along with available sites in Reading. It seeks to strike a balance between housing need and land availability. Providing 671 homes per annum would bring significant positive effects with regard to housing provision (13). This would prevent overuse of undeveloped land (4) bringing a tendency towards positive effects. Additionally, transport (14) and economic growth (18) would see a tendency for positive effects. This level of housing provision would enable the appropriate labour supply and take place in locations served by sustainable transport. Providing this many dwellings will place stress on health and education infrastructure (15, 20). All development carries negative environmental effects with regard to CO₂ emissions (1), natural resource use (3), waste (5) and pollution (6), but these can largely be mitigated through accordance with other policies. Development may also have impacts on townscape character (9) and the historic environment (10), although this is largely dependent on design.</p>																			
	<u>H1(iii): Provide less than the 671 dwellings per annum</u>	<p>Providing less housing than recommended by the HELAA would remove pressures on undeveloped land (4), the natural environment (7) and transport (14) bringing a tendency towards positive effects, but it would fail to provide the needed housing (13) and support the local economy (18). The negative effects of this option outweigh the positive effects. This is because the negative effects of housing provision can largely be mitigated. Housing delivery is the major priority of the plan and this option fails to meet that need.</p>																			
	<u>H1(iv): Provide 699 dwellings per annum as identified in the SHMA</u>	<p>This option aims to provide the number of dwellings recommended by the SHMA. Due to the constrained nature of land within the Borough, this would place strain on undeveloped land (4) and the natural environment (7), as well as services such as health (15) and education (20) and bring a tendency towards negative effects. If this policy pushed development out towards less well-connected areas of the borough, sustainable transport (14) would see a tendency towards negative effects, too. High density development in inappropriate locations would negatively affect townscape character (9). Effects to employment (18) are unclear, while housing provision (13) would see positive effects.</p>																			
	<u>H1 (v): Provide significantly more than 699 homes each year</u>	<p>Providing more than 699 homes a year would significantly boost housing provision and deliver higher levels of affordable housing. This option would see many of the same effects as option (iv), but they would be more pronounced. Undeveloped land (4), the natural environment (7), character (9), health facilities (15), transport (14) and education spaces (20) would see even greater negative effects as a result of strain. Effects on employment (18) are unclear. Employment space may be lost to residential development. In turn, housing provision (13) would see significant positive effects. Increasing the housing supply would bring more affordable housing. This would bring positive effects to inequality and deprivation (19). This option would likely require constructing homes within areas of high flood risk and would bring negative impacts with regard to climate change adaptation (2).</p>																			
	<u>H1(vi): Provide 689 dwellings per annum</u>	<p>The appraisal of this option is broadly the same as for the option for 671 dwellings per annum, as further work through the Local Plan examination process has demonstrated that these additional dwellings can be achieved without the additional negative impacts identified for option H1(v) on undeveloped</p>																			

		Sustainability Objectives & Effect																				
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
	land (4), the natural environment (7), character (9) and heritage (10).																					
	Conclusion Option (vi) is the preferred option because it brings particularly positive effects whilst making the most efficient use of land.																					
	Habitat Regulations issues There are not expected to be any differential effects on internationally-designated wildlife sites from any of the policy options.																					
	Equality issues There are not expected to be any differential effects on individuals or different groups from any of the policy options.																					
	MITIGATION: Negative effects as a result of housing must be carefully monitored and mitigated, particularly stress on healthcare and education infrastructure. The environmental costs of construction, effects on amenity and the historic environment, and the natural environment can be mitigated through accordance with other policies in the Local Plan. The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that needs are met over the plan period.																					

MM18: Changes to H2, 4.4.6 and 4.4.14

These changes provide more detail regarding the approach to indicative development capacities in site allocations and include reference to viability for self-build in order to improve clarity. The changes do not affect the overall meaning or operation of the policy, particularly because the references to development capacities were already reflected elsewhere in the plan, but simply provide further detail and clarity for applicants and allow greater flexibility where there are viability issues. Therefore, the changes do not require re-assessment in the Sustainability Appraisal.

MM19: Additional wording added to H3: Affordable housing, 4.4.20 and 4.4.23

The addition is intended to reflect the practical difficulties in achieving on-site provision on sites of 5-9 dwellings, to avoid placing significant burdens on developers of small sites and to provide interim guidance in advance of an SPD. This broadly reflects current practice in any case, as a financial contribution is almost always secured on sites of 5-9 dwellings rather than on-site provision.

This change also highlights the current needs in terms of tenure, albeit that it will need to be considered in more depth as part of an Affordable Housing SPD. This will enable planning decisions to better match new provision to tenure needs in the intervening period, and will have an effect on decisions on the ground, and will be relevant to objective 13 on access to high-quality housing. However, this is already identified as a significant positive change, so only the wording rather than the scoring would change as a result. The relevant amendments are below.

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
H3(iii) ▼	30% of affordable housing on sites of 10 or more, 20% of affordable on sites 5-9 and an equivalent contribution of 10% on sites of 1-4 (with viability considerations)	0	0	0	0	0	0	0	0	0	0	✓	0	✓✓	0	0	0	0	✓	✓✓	0
H3(iv) ▼	30% of affordable housing on sites of 10 or more, an equivalent contribution of 20% on sites 5-9 and 10% on sites of 1-4 (with viability considerations)	0	0	0	0	0	0	0	0	0	0	✓	0	✓✓	0	0	0	0	✓	✓✓	0
COMMENTS:																					

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
	<p>H3(iii): 30% of affordable housing on sites of 10 or more, 20% of affordable on sites 5-9 and an equivalent contribution of 10% on sites of 1-4 (with viability considerations)</p> <p>This option requires on-site provision or equivalent contribution of all new development with levels prescribed based on the number of dwellings, and identifies current needs for different tenures. This would significantly increase the amount of affordable housing within the Borough and match it to tenure needs. Any possible negative effects will be mitigated by viability considerations should this requirement result in undue strain on developers. This option would bring significant positive effects with regard to housing provision (13) and inequality (19) with positive effects with regard to health (11). This would bring positive effects with regard to economic activity, as lack of affordable housing is cited by local businesses as a barrier to economic growth (18).</p> <p>H3(iv): 30% of affordable housing on sites of 10 or more, an equivalent contribution of 20% on sites 5-9 and 10% on sites of 1-4 (with viability considerations)</p> <p>Whilst this option differs in terms of policy wording from H3(iii) in seeking an financial contribution from sites of 5-9 dwellings, in practice this is what is usually already happening in operating a policy equivalent to H3(iii), so the assessment scores are no different.</p> <p>Conclusion</p> <p>Options (iii) and (iv) are the preferred options because they bring particularly positive effects.</p> <p>Habitat Regulations issues</p> <p>There are not expected to be any differential effects on internationally-designated wildlife sites from any of the policy options.</p> <p>Equality issues</p> <p>There are not expected to be any differential effects on individuals or different groups from any of the policy options.</p> <p>MITIGATION: No negative effects requiring mitigation have been identified.</p>																				

MM20: Changes and additional wording added to H4: Build to rent schemes

This change allows for equivalents to the Rent with Confidence standards to be used and reduces the period for which schemes must remain as build-to-rent to 20 years, and does not fundamentally change the effects of the policy. Other changes aim to incorporate flexibility and provide more detail for applicants regarding tenure. It also refers to a forthcoming Affordable Housing SPD. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM21: Additional wording added to H5: Housing standards, 4.4.36, 4.4.44 and 4.4.45

This change introduces an overall viability clause into policy H5. The evidence to support the Local Plan shows that these requirements will be viable in the vast majority of cases, so the insertion of this clause will not have any implications for the scoring of the policy. However, the text should reflect the insertion of the new clause. (Other changes seek to reflect regulations and provide greater clarity. These changes do not affect the operation of the policy.)

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
H5(iii) ▼	All new build achieve higher water efficiency standard and at least 19% improvement on building regulations TER; all new build accessible and adaptable, 5% of 20 or more dwellings for wheelchair user	✓	✓	✓	0	0	0	0	0	0	0	✓	0	✓✓	0	0	✓	0	0	0	0
COMMENTS:																					
<u>H5(ii): All new build achieve higher water efficiency standard and at least 19% improvement on building regulations TER; all new build accessible and adaptable, 5% of 20 or more dwellings for wheelchair users</u>																					
This option aims to maximise water and energy efficiency within the context of recent government guidance. It also aims to provide sufficient levels of accessible and adaptable housing for disabled or older residents according to the building regulations. This would bring significant positive effects in delivering high quality housing of a type appropriate to the Borough (13) wherever it is viable, which will be in the majority of cases. Moderate positive effects would occur with regard to CO ₂ emissions (1), climate change (2), natural resource use (3), health (11), and equality (16).																					

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
<p>Conclusion Option (iii) is the preferred option because it brings particularly positive effects.</p> <p>Habitat Regulations issues There are not expected to be any differential effects on internationally-designated wildlife sites from any of the policy options.</p> <p>Equality issues There are not expected to be any differential effects on individuals or different groups from the preferred option. Less ambitious requirements for adaptability and accessibility may have significant detrimental effects on individuals with disabilities or older residents. The preferred option seeks to mitigate these effects by providing more adaptable and accessible housing, as well as homes for wheelchair users.</p> <p>MITIGATION: It is expected that a Zero Carbon standard would not prohibit economic growth or housing provision. All development will be subject to viability assessment in order to mitigate these effects, as recognised in the policy.</p>																					

MM22: Additional wording added to Paragraphs 4.4.95 - 4.4.98

These changes seek to be more precise about the existing need for student accommodation and to clarify why two allocations in the Local Plan do not comply with the location principle in H12. It does not change the intent or operation of the policy and therefore these specific wording alteration would not result in change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

However, an issue was raised during the Examination by the University of Reading in relation to the appraisal of this policy, highlighting that the option H12(iii) that appeared to be appraised was more in line with the UoR's (and others') proposed wording changes than the policy that actually appeared in the Pre-Submission Draft. The Council clarified that this was due to an error in how the option was titled in the Sustainability Appraisal rather than any error in the way that it was carried out. To clear this issue up, it is considered that changes need to be made to the description of option (iii) and a distinct option in line with the UoR's proposed approach added. The changes are set out below:

H12: STUDENT ACCOMODATION

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
H12(i) *	No policy	0	0	0	?X	0	0	0	0	?X	0	0	0	X	0	0	X	0	0	0	X
H12(ii)	Locate student accommodation throughout the Borough	0	0	0	?X	0	0	0	0	?X	0	0	0	X	0	0	✓	0	0	0	?✓
H12(iii)	Focus student accommodation on or adjacent to the university campus and existing student locations if possible	0	0	0	✓	0	0	0	0	✓	0	0	0	✓	0	0	✓	0	0	0	✓
H12(iv)	Policy to direct student accommodation to accessible areas	0	0	0	?✓	0	0	0	0	?X	0	0	0	X	✓	0	✓	0	0	0	?✓

COMMENTS:

H12(i): No policy

This option would fail to provide guidance for student accommodation. This could lead to excessive student accommodation within the town centre. This would limit the number of sites available to meet general housing needs (13). It may also drive development outside the town centre on undeveloped land (4). Overprovision of student accommodation may negatively affect townscape character (9) by failing to provide an appropriate residential mix. Although overprovision of student accommodation in the town centre may cause negative effects, the Council acknowledges the need for some student housing in

MM23: Deletion of wording in H13: Provision for gypsies and travellers and MM24: Edits to 4.4.100

These two changes in themselves do not make a fundamental difference to the Local Plan policy approach. Deletion of the requirement to identify need is ostensibly significant, but since the Council’s own evidence has already established a level of need, it would have been unlikely to be a particular issue in any case. However, what is of potential significance to the appraisal of H13 is the fact that the only identified gypsy and traveller site in the plan, WR4 at Cow Lane, for transit use, is proposed to be removed. Whilst this does not mean that no sites will be delivered, it does make it less likely, and affects the positivity of the appraisal of H13, as shown below.

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
H13(i) *	No policy	0	0	0	0	0	0	X	0	X	0	X	X	X	0	X	X	0	0	X	X
H13(ii) ▼	Existing policy providing criteria for new sites	0	0	0	0	0	0	?✓	0	?✓	0	?✓	?✓	?✓	0	?✓	?✓	0	0	?✓	?✓

COMMENTS:

H13(i): No policy

A ‘no policy’ option would fail to provide sites for gypsies and travellers (13). This may result in an increase in unauthorised encampments (7, 9) and place individuals at further risk of poor health (11), harm community cohesion (12), decrease facility access (15), increase deprivation (19) and limit education access (20). Failing to provide accommodation for Gypsies and Travellers would disproportionately affect individuals based on race or ethnicity (16).

H13(ii): Existing policy providing criteria for new sites

Allowing for authorised pitches and sites would improve the living environment for gypsy and traveller families, potentially reversing all of the negative effects in option (i). However, this would be entirely dependent on whether a site could be found, meaning that these effects are uncertain at this stage. The natural environment (7) and townscape/landscape character (9) may see positive effects, but this will be largely dependent on design.

Conclusion

Option (ii) is the preferred option because it brings particularly positive effects.

Habitat Regulations issues

There are not expected to be any differential effects on internationally-designated wildlife sites from any of the policy options.

Equality issues

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
A negative effect based on race/ethnicity has been identified, but not within the preferred option.																					
MITIGATION: The only way to mitigate potential negative effects would be through identification of a site within or without Reading's boundaries. The Council are continuing to seek to identify sites within Reading, and to liaise with its neighbours on potentially meeting needs outside the Borough.																					

MM25: Additional wording added to paragraph 4.5.3

This makes clear which developments are 'major' and which will therefore make a particular contribution to achieving policy TR1. Since it would only affect developments of exactly 10 dwellings or 1,000 sq m, it will only be of relevance to a very small minority of cases and will not have any implications for the overall effects of the policy. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM26: Additional wording added to TR2: Major transport projects

This wording merely identifies that not all projects will require safeguarding of land, which was the case anyway. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM27: Additional wording added to Paragraph 4.5.8

The proposed references are generally factual and will not therefore affect the application of the policy. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM28: Additional wording added to RL2: Scale and location of retail, leisure and culture development

The change to the policy reflects the way that the national sequential test operates in any case, so will not have a significant effect on policy approach. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM29: Insertion of new criterion in RL3: Vitality and viability of smaller centres, changes to 4.6.18 and 4.6.21

The new policy paragraph d) and change to 4.6.21 do not alter what the policy is trying to achieve, but establish a mechanism for achieving it in cases where there is a significant redevelopment of frontages. They do not therefore affect the policy effects as appraised, but increase the chances of achieving them in a few limited circumstances. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

The additional wording added to 4.8.18 is intended to ensure that applicants would not have to demonstrate that a facility had already been vacant for 5 years. This was always the intention and was assumed at the time of the appraisal. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM30: Edits to and additional wording added to OU1: New and existing community facilities and changes to 4.7.9

These take account of instances where new development would not materially affect the amount of students, and where there is therefore no effect on the housing market to control. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM31: Additional wording added to OU3: Telecommunications development

The additional wording relates to the impact on the historic environment. As the score in terms of effects on the historic environment (objective 10) was already significantly positive, the scoring would not be affected, but the wording should reflect the change.

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
OU3(ii) ▼	Continue current policy (SDPD DM21)	0	0	0	0	0	0	0	0	✓✓	✓✓	0	0	0	0	0	✓	0	0	0	0
COMMENTS:																					
<u>OU3(ii): Continue current policy (SDPD DM21)</u>																					
This option would have the most significant positive impacts on landscape or townscape character (9) and the historic environment (10) since it encourages the use of concealment options and ensures no negative impact on the historic environment. Provided that proposals meet existing international guidelines for public exposure, neither option should be associated with impacts on human health (11). Both options score positively in relation to supporting economic growth and employment (18) because both enable further communications development that would assist and grow local businesses.																					

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
<p><u>Conclusion</u> Option (ii) is considered to be the best option because it brings the most positive sustainability effects.</p> <p><u>Habitat Regulations issues</u> The proposed option should not have any effects on internationally designated wildlife sites.</p> <p><u>Equality issues</u> There are not expected to be any differential effects on individuals or different groups from the proposed option.</p> <p>MITIGATION: No negative effects requiring mitigation have been identified for the proposed approach.</p>																					

MM32: Deletion of wording and edits to Paragraph 4.7.26

Although the changes to the text are quite extensive, they relate to examples of how the policy could be applied, rather than setting policy in themselves. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM33: Edits to CR1: Definition of Central Reading

This change simply serves to clarify how the policy will be applied, rather than changing the policy in itself. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM34: Additional wording added to CR3: Public realm in Central Reading

This change brings the wording on the historic environment into line with that in the NPPF, but does not substantially change the policy's meaning. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM35: Deletion of wording in CR4: Leisure, culture and tourism in Central Reading

This change removes wording related to the now-revoked South East Plan. It does not change the meaning or operation of the policy and as such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM36: Edit to CR10: Tall buildings

This change brings the wording on the historic environment into line with that in the NPPF, but does not substantially change the policy's meaning. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM37: Edits to CR11a, Friar Street & Station Road

This change simply rewords the amount of development expected on each site, and makes no change to it. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM38: Edits to CR11b, Greyfriars Road Corner

This change simply rewords the amount of development expected on each site, and makes no change to it. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM39: Edits to CR11c, Station Hill & Friars Walk

This change simply rewords the amount of development expected on each site, and makes no change to it. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM40: Additional wording added to CR11g, Riverside

This change refers to the top of the bank of the river rather than the river itself and aims to be more specific about the relationship between leisure and office development. Whilst this may affect the development that can take place, it would be an extremely minor change and not one that would be reflected in sustainability appraisal. Additionally, it draws attention to the need for mitigation as a result of the Flood Risk Assessment. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM41: Additional wording added to Paragraph 5.4.12

The change simply adds additional clarity to reflect national policy guidance on flood risk and does not affect meaning. As such, there is no change to the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM42: Edits to CR12a, Cattle Market

This change simply rewords a sentence to make it clearer as to how a decision-maker should respond. It does not change the meaning and as such, there is no change to the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM43: Edits and additional wording added to CR12b, Great Knollys Street and Weldale Street and edit dwelling range

Part of this modification rewords a sentence to make it clearer as to how a decision-maker should respond. Whilst this may affect the development, it would be an extremely minor change and not one that would be reflected in the sustainability Appraisal. As such, there is no change to the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

This change to the dwelling range increases the upper range of the amount of development expected on the site, in order to align the policy with a recent planning permission. This is a minor change to the site's indicative potential, but does not affect the realities of the site. The policy as changed would still fall within the primarily residential development option in the Sustainability Appraisal and would not result in tall buildings (thus bringing it within a different option). As such there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM44: Additional wording added to CR12e, Hosier Street and 5.4.17

This change simply rewords the sentence to provide clarity and to bring the policy and supporting text into line with one another. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM45: Additional wording added to CR13a, Reading Prison and 5.4.28

This change simply re-iterates that any use of the listed building be compatible with its heritage. It does not change the meaning of the policy and as such, there is no change from the assessment in Sustainability Appraisal of the Pre-Submission Draft.

MM46: Additional wording added to CR13b, Forbury Retail Park

This change refers to the top of the bank of the canal rather than the canal itself. Whilst this may affect the development that can take place, it would be an extremely minor change and not one that would be reflected in sustainability appraisal. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM47: Edited dwelling range for CR13c, Kenavon Drive & Forbury Business Park

The changes to the dwelling range are significant enough to justify appraising as a separate option, as follows:

CR13c: KENAVON DR AND FORBURY BUSINESS PARK

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
CR13c(i) *	Do not allocate	✓X	0	✓X	X	✓X	✓X	0	0	?X	0	0	0	X	0	0	0	0	0	0	0
CR13c(ii) ▼	Mainly residential development (130-190 dwellings)	✓X	X	✓X	✓✓	✓X	✓X	0	0	?✓	?X	✓X	0	✓✓	✓✓	X	?X	?✓	?X	0	X
CR13c(iii)	Commercial development	✓X	X	✓X	✓✓	✓X	✓X	0	0	?✓	?X	0	0	X	✓	0	0	0	✓	0	0
CR13c(iv)	Mixed-use	✓X	X	✓X	✓✓	✓X	✓X	0	0	?✓	?X	✓X	0	✓✓	✓	X	?X	?✓	✓	0	X
CR13c(v)	Mainly residential development (190-285 dwellings)	✓X	X	✓X	✓✓	✓X	✓X	0	0	?✓	?X	✓X	0	✓✓	✓✓	X	?X	?✓	?X	0	X
COMMENTS:																					
<u>CR13c(i): Do not allocate</u>																					
The effects on environmental objectives would be positive in the short term through retaining buildings, although the performance of the individual																					

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
<u>Habitat Regulations issues</u>																					
The proposed option should not have any effects on internationally designated wildlife sites.																					
<u>Equality issues</u>																					
A negative effect based on age and disability has been identified if residents are located within an area of flood risk, but these effects can be mitigated.																					
MITIGATION: Increasing the scope for residential development in this area will place additional stress on school places in the town centre. School capacity must be carefully monitored and increased if necessary in order to mitigate these effects. Any loss of employment floorspace should be made up elsewhere. The environmental effects of redevelopment can be mitigated through sustainable design and construction practices.																					

MM48: Edits of wording in CR13d, Gas Holder

This change simply rewords the policy to refer to the Kennet generally, rather than the Kennet Mouth, and also clarifies that development should be set back 10m from the top of the river bank. Whilst this may affect the development that can take place, it would be an extremely minor change and not one that would be reflected in sustainability appraisal. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM49: Edits to CR14m, Caversham Lock Island and Caversham Weir, Thames side

This change simply rewords the sentence to provide clarity for a decision-maker. It does not change the meaning of the policy. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM50: Additional wording added to Paragraph 5.3.34

This change points applicants to other policies in the Local Plan that provide further guidance but would apply in any case. It does not change the meaning or application of the policies and as such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM51: Edits to CR16: Area to the north of Friar Street and East of Station Road

These changes make the policy clearer, but do not change its overall intent. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM52: Additional wording added to SR1a, Former Landfill, Island Road

This change refers to the top of the bank of the river rather than the river itself and clarifies access requirements. Whilst this may affect the development that can take place, it would be an extremely minor change and not one that would be reflected in sustainability appraisal. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM53: Additional wording added to SR4e, Part of Former Berkshire Brewery Site and SR4f, Land south west of Junction 11 of the M4

This change refers to the top of the bank of the river rather than the river itself. Whilst this may affect the development that can take place, it would be an extremely minor change and not one that would be reflected in sustainability appraisal. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft Local Plan.

MM54: Additional wording added to Paragraphs 6.3.15, 7.3.14, 8.3.3 and 9.3.3

This change points applicants to other policies in the Local Plan that provide further guidance but would apply in any case. It does not change the meaning or application of the policies and as such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM55: Additional wording added to SR5: Leisure and recreation use of the Kennetside areas

This change does not change the meaning of the policy, but draws attention to a specific nearby operation and draws attention to the need for Thames Water to be contacted at the earliest possible opportunity. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM56: Additional wording added to WR2: Park Lane Primary School, The Laurels and Downing Road

This change does not change the meaning of the policy, but draws further attention to the need for replacement early years provision. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM57: Deletion of Policy WR4: Potential Traveller Transit Site at Cow Lane

The Sustainability Appraisal for this policy will be deleted entirely, to reflect that the Council is no longer proposing this development.

WR4: POTENTIAL TRAVELLER TRANSIT SITE AT COW LANE

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
WR4(i) □□	No-policy	0	0	0	0	0	0	0	0	XX	0	XX	XX	?X	0	0	0	0	0	0	0
WR4(ii)	Traveller transit site	?X	?X	X	?X	X	X	?X	0	?	0	?X	?□	□□	□	?□	□X	?	0	□□	?□
WR4(iii)	Residential	?X	?X	X	?X	X	X	?X	0	?	0	?X	0	□	□	?X	0	?	0	0	?X
WR4(iv)	Offices/Leisure/Retail	?X	?X	X	?X	X	X	?X	0	?	0	0	0	X	□	?□	0	?	□	0	?□

COMMENTS:

WR4(i): No policy

Not allocating the site will have largely neutral and negative effects. It would fail to provide housing (13), but would retain the site which currently contributes to landscape character near the Thames Path and Rivermead Leisure Centre. There would be significant negative effects with regard to character (9), health (11) and community (12) since failing to allocate a site would allow unauthorised encampments to continue occurring throughout the Borough.

WR4(ii): Traveller transit site

Allocating the site for temporary occupation by caravans would provide housing for a marginalised group, bringing significant positive effects with regard to housing (13) and inequality/deprivation (19). Environmental effects would be negative, since the site is currently vacant and any redevelopment would use resources, produce waste, emit carbon, etc. (1-6). A transit site may negatively impact wildlife and the natural environment, but the site does not exhibit any particular biodiversity value (7). It is uncertain if the site would contribute to or detract from local character (9). This is largely dependent on management. Residents would be exposed to poor air quality (11). Provision of a traveller transit site would reduce crime (12) by allowing the police to take action against unauthorised encampments in other parts of the Borough. The site is in a fairly accessible location (14) and families would have access to healthcare and education (15, 20). Impacts on the nearby leisure centre are uncertain (17). Equality impacts are mixed (16). Because the site is adjacent to Flood Zone 3, the allocation may place a vulnerable community at risk, although it is possible to mitigate these effects by ensuring all caravans are situated in Flood Zone 2. Positive equality effects would occur through providing accommodation for a group that often suffers

		Sustainability Objectives & Effect																				
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
	discrimination on the basis of race.																					
	<u>WR4(iv): Residential</u> The environmental effects of this option are similar to option (ii). This site is unlikely to be suitable for residential development because of flood risk, noise, air quality and the fact that it could not accommodate very many dwellings due to its size and flood constraints. This option would have a neutral effect on crime (12) and residents may stress on existing health and education infrastructure (15, 20).																					
	<u>WR4(v): Offices/Leisure/Retail</u> This option is similar to option (iii), but would not place residents in an area of poor air quality (11) or cause stress on existing healthcare and education infrastructure (15, 20). This option would bring positive effects with regard to economic growth and employment (18).																					
	<u>Conclusion</u> Option (ii) is the preferred option because it provides much needed housing for a marginalised group and will reduce unauthorised encampments within the Borough.																					
	<u>Habitat Regulations issues</u> There are not expected to be any differential effects on internationally-designated wildlife sites from any of the policy options.																					
	<u>Equality issues</u> A negative effect based on race has been identified if residents are located within an area of flood risk, but these effects can be mitigated. A positive effect based on race has been identified by providing housing for a marginalised group.																					
	<u>MITIGATION:</u> Development should avoid negative impacts on existing vehicular routes or public rights of way or the operation of Reading Festival. Any adverse effects in terms of amenity and safety should be monitored and mitigated. Development should take account of mitigation required as a result of a Flood Risk Assessment. Design can help to mitigate the effects of noise and poor air quality. A strong landscaped buffer should be provided to protect open spaces, commercial sites and the Richfield Avenue frontage.																					

MM58: Additional wording added to CA1a, Reading University Boat Club, Thames Promenade

The potential for retention of the boat club should be reflected in the appraisal as follows:

CA1a: READING UNIVERSITY BOAT CLUB, THAMES PROMENADE

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
CA1a(i) *▼	Do not allocate	✓X	0	✓X	X	✓X	✓X	0	0	0	0	?✓	0	X	0	0	0	?✓	0	0	0

CA1a(ii)	Residential development only in Flood Zone 2 (16-25 dwellings) with boat house retained, reprovided or loss justified	✓X	?X	✓X	✓	✓X	✓X	0	0	?X	0	?✓	?✓	✓	✓	✓X	?X	✓/0	0	0	?X
CA1a(iii)	Higher density residential (over 40 dwellings) with boat house retained, reprovided or loss justified	✓X	XX	✓X	✓	✓X	✓X	0	0	?X	0	?✓	?✓	✓✓	✓	✓X	X	✓/0	0	0	?X
CA1a(iv)	Leisure uses associated with meadows with boat house retained, reprovided or loss justified	✓X	?X	✓X	✓	✓X	✓X	0	0	?X	0	✓	0	X	0	0	0	✓✓	0	0	0

COMMENTS:**CA1a(i): Do not allocate**

Not allocating the site for development would mean no environmental costs through construction, although the performance of the existing building is not likely to be optimal. A previously developed site would be left undeveloped (4) and an opportunity to provide housing would be lost (13). A leisure facility would be retained, although it is not clear that there is a future for the current use (17, 11).

CA1a(ii): Residential development only in Flood Zone 2 (16-25 dwellings)

As for all development options there are potential environmental costs in terms of CO₂ emissions (1), energy use (3), waste generation (5) and pollution (6), but these may be offset by future improved performance. A negative effect on flood risk has been identified (2) due to the location in the floodplain. The development would make good use of a previously developed site (4). The location adjacent to a major landscape feature means that development risks a negative impact (9). The development would provide housing (13) in an area with good access to services and facilities (14, 15) and areas of informal recreation (17), and residential use adjacent to the meadows could enhance natural surveillance (12). Development will have an impact on health and education infrastructure (15, 20). It would also ensure that the facility is either retained, reprovided off site or its loss justified, bringing positive or neutral effects with regard to leisure (17). Failing to address flooding issues would have significant negative effects with regard to equality (16). Locating residents within areas of flood risk may disproportionately affect individuals with disabilities and older residents.

CA1a(iii): Higher density residential (over 40 dwellings)

The effects would largely be the same as for option (ii), although it is considered that the effect on housing provision would be significant (13). An increase in the number of dwellings would place residents in areas of the site at higher risk of flooding, bringing significant negative effects (2).

CA1a(iv): Leisure uses associated with meadows

Although some of the effects would be the same as for other development options, there would be a significant positive effect on access to leisure (17), with knock-on effects on human health (11).

Conclusion

Option (ii) is the preferred option because it brings particularly positive effects.

Habitat Regulations issues

The proposed option should not have any effects on internationally designated wildlife sites.

Equality issues

A negative effect based on age and disability has been identified if residents are located within an area of flood risk, but these effects can be mitigated.

MITIGATION: Environmental impacts can be mitigated to some extent through sustainable design and construction measures. Effects on infrastructure, particularly health and education could be mitigated either by on-site provision or off-site contribution. Due to the risk of flooding, development should only be located in Flood Zone 2 along Abbotsmead Road. Development must avoid detrimental visual effects on the Thames Valley major landscape feature, provide a green link connecting to Christchurch Meadow and take account of possible archaeological significance. In order to prevent loss of a leisure facility, redevelopment for residential is subject to relocation of the club.

MM59: Edits to CA1b, Part of Reading Golf Course, Kidmore End Road

Whilst there are extensive changes to the wording of the policy on Reading Golf Club, these generally introduce some flexibility for different models of golf operation and are clearer about how the policy will operate and what requirements will be applied, and the intent of the policy remains largely the same. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM60: Edits to CA1d, Rear of 200-214 Henley Road, 12-24 All Hallows Road & 4, 7 & 8 Copse Avenue

This change seeks to avoid being overly prescriptive, but does not change the overall meaning of the policy. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM61: Additional wording added to CA1f, Rear of 1 & 3 Woodcote Road and 21 St Peter's Hill

This change provides additional detail to emphasise the role of archaeological significance, but does not change the meaning of the policy. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM62: Additional wording added to CA2: Caversham Park

This change adds flexibility for an applicant in order to account for uncertainty about the existence of past historic footpaths and their suitability. It also aims to bring criteria into line with the wording of EN1, EN12, EN13 and EN14. These changes do not change the policy's meaning. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM63: Additional wording and edits to Paragraph 9.2.7

The change simply aligns the supporting text in the East Reading section to reflect the intent of H12. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM64: Additional wording added to ER1c, Land rear of 8-26 Redlands Road

The potential for inclusion of student accommodation should be reflected in the appraisal as follows:

ER1c: LAND REAR OF 8-26 REDLANDS RD

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
ER1c(i) *▼	Do not allocate	0	0	0	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ER1c(ii)	Residential development (12-18 dwellings) with potential for student accommodation or university uses	?X	?X	?X	X	?X	?X	✓	0	?X	X	?X	0	✓	?✓	0	0	0	0	0	0/?✓
ER1c(iii)	Higher density residential development (over 30 dwellings) with potential for student accommodation or university uses	?X	?X	?X	X	?X	?X	?X	0	XX	XX	?X	0	✓	?✓	?X	0	0	0	0	?X/✓
ER1c(iv)	Redevelop the entire site for residential	?X	?X	?X	X	?X	?X	XX	0	XX	XX	?X	0	✓	?✓	?X	0	0	0	0	?X

COMMENTS:

ER1c(i): Do not allocate
As there would be no development, undeveloped land would be preserved (4), but potential provision of housing would be adversely impacted (13).

ER1c(ii): Residential development (12-18 dwellings) with potential for student accommodation or university uses
As for any development, there would be a number of potential adverse effects in terms of CO₂ (1), energy use (3), waste (5) and pollution (6). In addition,

		Sustainability Objectives & Effect																				
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
	development would use undeveloped land (4). The site is partially within the Air Quality Management Area, which could potentially affect health (11). The site is within a conservation area and adjacent to listed buildings (10), and, whilst development could potentially have a positive effect, this needs to be highlighted as a potential issue at this stage. There are also concerns that a scheme could adversely affect the character of the local area (9). There would be a positive effect on housing provision (13), and more intense development would reduce the need to travel (14). Because the policy stipulates retention of mature green trees and establishment of a green link, positive effects will occur with regard to the natural environment and wildlife (7). Student accommodation or university uses may bring positive effects with regard to education (20).																					
	<u>ER1c(iii): Higher density residential development (over 30 dwellings) with potential for student accommodation or university uses</u> The effects of this option are largely similar to option (ii), but higher density residential development is much more likely to adversely impact local character (9). Additionally, an increase in residents may place stress on education and healthcare infrastructure (15, 20). Student accommodation or university uses may bring positive effects with regard to education (20).																					
	<u>ER1c(iv): Redevelop the entire site for residential</u> This option is similar to option (iii), but would bring significant negative effects with regard to the natural environment (7) since there are many significant trees on site.																					
	<u>Conclusion</u> Option (ii) is the preferred option because it brings particularly positive effects.																					
	<u>Habitat Regulations issues</u> The proposed option should not have any effects on internationally designated wildlife sites.																					
	<u>Equality issues</u> There are not expected to be any differential effects on individuals or different groups from the proposed option.																					
	MITIGATION: Any negative environmental effects occurring during redevelopment would need to be carefully mitigated. Development should make a positive contribution to the conservation area and adjacent listed building and take account of any potential archaeological significance. Development should retain mature trees and create a green link, as well as retain the wall fronting Morgan Rd. Air quality effects on residents must be mitigated.																					

MM65: Edits and additional wording added to ER2: Whiteknights Campus, University of Reading and 9.3.10

This change rewords the policy to make it clearly align with OU1 and H12. It does not change the meaning of the policy. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM66: Changed boundary for CA1d: Rear of 200-214 Henley Road, 12-24 All Hallows Road and 4, 7 and 8 Copse Avenue

The changed boundary is extremely minor, and is purely to ensure that the development as originally envisaged can be implemented without access issues. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

MM67: Changed boundary of areas of biodiversity significance

The changed boundaries are minor, and simply reflect the reality of where the woodland actually exists. As such, there is no change from the assessment in the Sustainability Appraisal of the Pre-Submission Draft.

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES

TO:	POLICY COMMITTEE		
DATE:	10 JUNE 2019		
TITLE:	PROJECT FUNDING AWARD - ADEPT/DFT £4.75M GRANT FUNDING FOR THAMES VALLEY BERKSHIRE LIVE LABS		
LEAD COUNCILLOR:	TONY PAGE	PORTFOLIO:	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT
SERVICE:	PLANNING, TRANSPORT AND REGULATORY SERVICES	WARDS:	BOROUGHWIDE
LEAD OFFICER:	SIMON BEASLEY	TEL:	0118 937 2228
JOB TITLE:	NETWORK & PARKING MANAGER	E-MAIL:	simon.beasley@reading.gov.uk

1. EXECUTIVE SUMMARY

- 1.1 The purpose of this report is to inform Members of the Committee of a £4.75M grant award from the Department of Transport (DfT) through the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) for a two-year technological trial to help futureproof roads and transport.
- 1.2 The project (*Thames Valley Berkshire Live Labs*) objectives are to deploy data science and Internet of Things (A network of internet connected objects able to collect and exchange data - commonly abbreviated as IoT) in Reading and across Berkshire to boost productivity, improve health and travel conditions.
- 1.3 This innovation initiative will trial technologies and working practices to tackle issues impacting on Reading and the wider Berkshire area productivity and population incorporating health, congestion, air quality, road surface quality and potholes, energy consumption and carbon emissions. The project aims to harness the value of data to demonstrate how to make a measurable difference to the health of the region's population and the operational efficiency of the region's road network, whilst reducing CO2 emissions and improving the region's productivity.
- 1.4 The grant award has been accepted and half the funding has already been received with the remaining funding expected later this year. The project has essentially commenced with our mobilisation plan delivered to the

ADEPT/DfT programme board on 10th May 2019. This report seeks approval to spend the grant in accordance with the project objectives and the grant conditions.

2. RECOMMENDED ACTION

- 2.1 That the Committee note the contents of this report.**
- 2.2 That the Committee gives scheme and spend approval for the *Thames Valley Berkshire Live Labs project* totalling £4.75M of grant funding to deliver the objectives of this 2-year technological trial.**
- 2.3 That delegated authority is given to the Executive Director for Economic Growth and Neighbourhood Services, the Assistant Director of Legal & Democratic Services and the Assistant Director of Finance to enter into contracts as are required to deliver the project objectives.**
- 2.4 That further reports on progress of each project theme be reported to the relevant Committees.**

3. POLICY CONTEXT

- 3.1 This is an innovation initiative for a 2-year technological trial to help futureproof roads and transport which is aligned to current central government and local government policies. The local objectives also meet the broader vision of the council's Local Transport Plan (LTP).**

4. BACKGROUND, PROPOSALS AND RECOMMENDATIONS

- 4.1 This report informs Members of the Committee of a £4.75M grant award from the DfT through ADEPT. The grant award is for a 2-year project under the title - *Thames Valley Berkshire Live Labs*. The project objectives are to deploy data science and Internet of Things ((A network of internet connected objects able to collect and exchange data - commonly abbreviated as IoT) in Reading and the wider Berkshire area to boost productivity, improve health and travel conditions.**
- 4.2 This innovation project will trial technologies and working practices to tackle issues impacting on Thames Valley Berkshire productivity and populations health - congestion, air quality, road surface quality and potholes, energy consumption and carbon emissions. The project aims to harness the value of big data, IoT and data science to demonstrate at scale how to make a measurable difference to the health of the region's population and the operational efficiency of local authorities, whilst reducing CO2 emissions and improving the region's productivity.**
- 4.3 The project spans the unitary authorities of Berkshire, focusing on five inter-related themes: pot holes, air quality & exposure, traffic flow, energy and health. Each of the 5 project areas are described as:**

- Potholes & Road Surface Quality

The impact of potholes stretches far beyond a minor inconvenience for motorists. They exacerbate noise issues from larger vehicles in residential areas, leading to disturbed sleep and negative impacts on health, wellbeing and productivity. Road maintenance remains a significant challenge for local highway authorities; it is 20 times more expensive to carry out reactive maintenance than planned, preventative maintenance.

This project will fuse a variety of data including O2 mobile phone data, local authority traffic systems data, GeoTab telematics data (GPS Fleet Tracking) and existing traffic sensor data. The developed platform will inform local authorities of the most heavily used routes with the poorest road surface quality, this will be presented in a web-based interface to help the local authorities take a planned, preventative approach to road maintenance.

The Thames Valley Berkshire Live Lab project will establish a link with the Cumbria Live Lab project to share learning on this area. We anticipate using research and insights from the Cumbria Live Lab project to investigate the feasibility of using locally-sourced non-recyclable plastics to reduce the carbon impact of road surfacing and repair. A potential source of non-recyclables will be through the Berkshire based Re3 waste contract for Reading, Wokingham and Bracknell Forest Boroughs.

- Air Quality & Public Exposure

The relationship between transport, pollution and local air quality is complex. Poor air quality is a significant environmental risk to public health in the UK. Long term exposure (years) reduces life expectancy due to respiratory diseases and lung cancer, whilst short term exposure (hours/days) exacerbates asthma and increases cardiovascular and respiratory hospital admissions. Providing people with better information about air quality is important so they can make informed choices to reduce their exposure, for example taking different walking or driving routes to work and school.

This project will develop an innovative approach for measuring air quality and corresponding public exposure to NO_x, particulate matter (PM₁₀ and PM_{2.5}) and CO emissions in the study area. An innovation competition will run in parallel to create an engaging way to disseminate the insights.

Siemens has completed a market scanning and field testing programme and will deploy up to 36 sensors across 6 or more pilot locations including the A4 and A322/A329 corridors and other locations to be determined such as around schools, potholed roads etc. Each location will be monitored for a minimum of three to six months, before sensors are moved elsewhere, allowing a detailed dataset across a range of different pilot use cases to be established. The visualisation and modelling of public exposure will form one of

the WAYRA challenges (Advancing healthcare through digital innovation).

- Traffic Flow

The project establishes a real time view of traffic flow to improve network management. Data from existing detection infrastructure (traffic system loop counters, Bluetooth journey time monitors and Automatic Number Plate Recognition (ANPR) cameras) will be combined with data capture methods deployed for this project. The combination of these datasets will create a real time view of network activity, providing previously unavailable information about trip types, origins and destinations and how incidents affect the network. This will facilitate better management of the network to improve journey times, reduce pollution and respond dynamically to changes in traffic flow and incidents. The platform will allow all modes to be considered and targeted interventions to be delivered. By example; optimising the network to improve air quality around schools and smoothing flow in the areas that have the most benefits for people. The project will focus on key areas including sections of the A4 and A322 that pass through most of the Berkshire local authority areas. This is alongside other areas such as around schools or major employment areas. Over the course of the project the net benefits are anticipated to grow through increased data levels, machine learning and as changes in user behaviour become more common.

- Energy

The growth of Electric Vehicles (EVs) and onsite renewables is a positive step in tackling carbon emissions, yet supporting infrastructure needs to ensure these systems are run efficiently to maximise energy and carbon saving opportunities. We, along with other Berkshire UAs, are converting to Electric Vehicles (EVs) and installing charging points to reduce their carbon impact. EVs substantially reduce the carbon impact of each trip (by about 50% based on current UK electricity generation mix), eliminate NOx pollution, and reduce particulate emissions by c50%. However, they are not zero emission and so for the local authorities to maximise the environmental benefits of EVs they need to optimise both when vehicles are used, to minimise electricity use, and when vehicles are charged, to maximise the proportion of renewable energy drawn. The project will deliver a high-functionality, high value demonstration of the integrated, smart transport and energy digital platform with applications for dashboards, analytics, optimised operation and planning at selected Local Authority sites.

- Health

All of the deliverables of this project impact on health, and the proposal here is to create a dynamic public health risk tool and trial it within our area. O2 and the University of Reading will work with an innovation partner to build the tool, who will be appointed using an

open innovation call. Integrating mobility data from the project, open data and local authority data, insights will be created that measure public health risks. By mapping public health risk we will be able to see where future public health costs will emerge from. It is the creation of insights when looking at these datasets in combination that reveals a new perspective on the causes of public health issues - in particular obesity, respiratory disease, loneliness and frailty. These insights will enable targeted interventions specific to both the area and the underlying issues to be monitored for their efficiency.

- 4.4 The project incorporates an innovation competition for local start-ups and Small to Medium size Enterprises (SME's) who will be awarded funding to address the issues and challenges related to potholes, local travel choices, local pollution and congestion. The two year £4.75M project is funded in its entirety by the Department for Transport therefore there is no match funding requirement from the Council.
- 4.5 The proposed main project partners are Reading Borough Council and the other Berkshire authorities, O2, WAYRA (Health technology), PBA (Programme managers), Siemens, Shoothill (custom software development), Smarter Grid Solutions (distributed energy resources management systems), Thames Valley LEP and Reading University.
- 4.6 The intention is that the project will be delivered through the main project partner O2, with RBC as grant holder and the client. The proposal is that O2 will create contracts with all other delivery partners and any other sub-contractors. Contract and procurement issues will be reviewed by our in-house legal and procurement resource as a part of the overall risk management and governance of the project.
- 4.7 It is proposed that O2 will assume responsibility for overall project management in partnership with PBA. O2 propose to resource a Project Manager with extensive in field technology deployment experience who will lead the project Steering Group. They will have support from the O2 smart cities team and other specialist contractors such as our current traffic systems supplier Siemens.
- 4.8 As lead partner RBC has overall responsibility for Project Governance and Scrutiny to ensure that the project Grant funding is spent in accordance with local authority requirements for spend scrutiny and in accordance with the conditions of grant. The grant will also be utilised to fund a dedicated RBC Project Manager to take on overall responsibility as client of the project for the Council.
- 4.9 A quality assurance process will be set up to check all documents produced by the project to report on outcomes and the benefits of the project. This is proposed to be set up by O2 and PBA who are quality assured to ISO 9001. Suitable peer reviewers will be selected from within the project to

undertake this checking and where the University publishes research outputs these will be externally peer reviewed using their systems.

- 4.1 Policy committee is asked to grant scheme and spend approval to this innovative project with delegated authority to enter into contracts to deliver the project objectives.

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 These proposals contribute to the Council's strategic aims of:

- Safeguarding and protecting those that are most vulnerable
- Providing the infrastructure to support the economy.
- Keeping the town clean, safe, green and active.
- Remaining financially sustainable to deliver these service priorities

These proposals also contribute to developing Reading as a Green City with a sustainable environment and economy at the heart of the Thames Valley.

The proposals will fully support the aspirations of the Council under the declared Climate Emergency

6. COMMUNITY ENGAGEMENT AND INFORMATION

- 6.1 The project requires community engagement for it to be successful. The funding award encourages community involvement with opportunities to get involved through live trails as they develop.

7. LEGAL IMPLICATIONS

- 7.1 Funding will be paid as grant under Section 31 of the Local Government Act 2003. The conditions attached to the Local Transport Capital Block Funding (Integrated Transport and Highway Maintenance) Specific Grant Determination 2019/20 No 31 apply to this grant award. The project has been awarded as part of competitive process where the DfT received 28 separate bids. Our award is one of 8 projects to receive this grant funding.
- 7.2 The DfT have indicated that there are no State Aid issues due to the competitive bidding process and the nature of this as a research and development project. However, the council will need to satisfy its legal requirements respect of receiving and distributing the grant funding before entering into any contracts, also that contracts entered into are compliant with the council's Contract Procedure Rules and the Public Contracts Regulations 2015.
- 7.3 Match funding is not part of this project therefore the £4.75M grant is the total funding for this project.

8. EQUALITY IMPACT ASSESSMENT

8.1 In addition to the Human Rights Act 1998 the Council is required to comply with the Equalities Act 2010. Section 149 of the Equalities Act 2010 requires the Council to have due regard to the need to:-

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.2 The Council does not consider that the proposals will have a direct impact on any groups with protected characteristics. However, this will be reviewed as a part of the project implementation and assessed throughout as appropriate.

9. FINANCIAL IMPLICATIONS

9.1 This project is a £4.75M grant awards from the DfT as explained within this report. There is no match funding requirement placed on local authorities so the project funding shall not exceed the grant award. The Council will assess and monitor all aspects of this project including the finance as a part of its internal governance processes.

10. BACKGROUND PAPERS

10.1 None.

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READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES

TO:	POLICY COMMITTEE		
DATE:	10 JUNE 2018		
TITLE:	COMMERCIAL INVESTMENT STRATEGY		
LEAD COUNCILLOR:	CLLR BROCK	PORTFOLIO:	LEADERSHIP
SERVICE:	PROPERTY ESTATES AND VALUATIONS / FINANCE	WARDS:	BOROUGH WIDE
LEAD OFFICER:	KATHRYN CARR	TEL:	0118 937 2604 /
JOB TITLE:	MATT DAVIS DEPUTY DIRECTOR OF REGENERATION AND ASSETS	E-MAIL:	0118 937 2954 kathryn.carr@reading.gov.uk matthew.davis@reading.gov.uk
	HEAD OF FINANCE		

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 The Council is required to have both an approved Treasury Management and Investment Strategy under Statutory Guidance on Local Government Investments (3rd Edition, issued February 2018) which themselves shall also have due regard to CIPFA guidance (both the Treasury Management Code of Practice and Prudential Code for Capital Finance).
- 1.2 The strategy relating to Treasury Management investments has been incorporated into the overall Treasury Strategy, considered and approved by Council in February 2019. This commercial investment strategy forms part of that overall Treasury Strategy and should be read in the context of it offering further detail and specific qualification to that overall strategy.
- 1.3 The purpose of this report is to seek Policy Committee’s approval to adopt the Commercial Investment Strategy and supplements the previously approved Treasury Management Strategy.
- 1.4 In December 2016 Policy Committee agreed a Property Acquisitions Strategy. This report provides a summary of the principal changes to that strategy and the development of the draft Commercial Investment Strategy attached at Appendix 1.
- 1.5 The full report and strategy is on the agenda as a closed session item as some elements of the strategy remain commercially sensitive. As much of the report and strategy as possible has been made available in the public domain.

Appendix 1: Commercial Investment Strategy April 2019.

2. RECOMMENDED ACTION

- 2.1 That the Committee approve the adoption of the Commercial Investment Strategy attached at Appendix 1.**

3. POLICY CONTEXT & CURRENT POSITION

- 3.1 The Council approved its Medium Term Financial Strategy (MTFS) at Full Council on the 26 February 2019. The MTFS is informed by and supports delivery of the Council's Corporate Plan priorities and seeks to ensure that the Council is 'fit for the future' with sound finances that allow the Council's future funding challenges and pressures to be met.
- 3.2 In the context of the Capital Strategy, the Council is using capital to invest in property to support regeneration and / or generate a revenue income stream. This is one of a number of approaches the Council is adopting to mitigate demand pressures and maintain services in the context of reduced government funding. The MTFS includes a capital budget of £150m in its three year capital programme (2019/20 - 2021/22) for the acquisition of new investment property. The resultant net income from these investments is assumed in the MTFS. Failure to deliver this additional income will create a shortfall in the Council's budget position.
- 3.3 Alongside the MTFS Full Council also approved the Council's Treasury Management Strategy (TMS) 2019/20. The TMS sets out the Council's planned Treasury activity during 2019/20. The TMS reflects the Council's Capital Programme 2019/20 to 21/22. The successful identification, monitoring and control of financial risk is central to the Strategy. Non-Treasury investments are reflected in this document.
- 3.4 In July 2016 Policy Committee approved the Council's Corporate Asset Management Plan. One of the principal aims of the Plan was to maintain an effective property-based investment portfolio, to help sustain the Council's on-going financial position.
- 3.5 At its meeting of 5th December 2016 Policy Committee approved the adoption of a Property Acquisition Strategy to further its strategic objectives of facilitating regeneration, economic growth and housing delivery, as well as remaining financially sustainable. The policy provided a framework within which potential investment acquisitions could be objectively assessed.
- 3.6 Nationally, local government has invested significantly in the property investment sector in its own right, making use of preferential borrowing rates to acquire income producing assets as part of a balanced investment portfolio in order to facilitate regeneration and economic growth and contribute to achieving the Council's wider strategic objectives.
- 3.7 It is now timely to review the adopted Property Acquisition Strategy (December 2016) and adopt a revised Commercial Investment Strategy.

Current Investment Portfolio:

3.8 Since 2016 the Council has purchased the following investment properties.

Address	Rental income (gross pa) £,000	Capital Value £,000	Purchase Price £,000	Net Annual Income *(after MRP) £,000
Kennet Wharf, Queens Road	1,295	20,100	20,091	453
Adelphi House, Friar Street	744	12,327	11,432	222
160 -163 Friar Street offices, public house and retail	729	12,650	11,230	259
Four 10 TVP	1,660	36,197	32,914	621 (MRP not applicable in the first year. £162k from 20/21).

In addition to the above, the Council has a number of historic investment properties.

4. WAY FORWARD

4.1 The Commercial Investment Strategy:

- Sets out the Council's objectives in acquiring property assets for investment purposes.
- Identifies the issues of the economy, the general property market and the possible risks for the Council in acquiring investment property.
- Clarifies the legal powers used to operate the Strategy and ensure continued compliance.
- Identifies criteria for acquiring and owning property assets for investment purposes to ensure risks are minimised.
- Outlines the due diligence and decision making process involved in acquiring property assets for investment purposes.

4.2 Acquisition for investment purposes to generate an income stream is a natural progression from acquisition for regeneration purposes. The two can also be combined, securing an income stream and the future regeneration of a site.

4.3 Historically, property has proved to be one of, if not the best, investments in terms of Capital growth over the last 50 years. If the Council owns the property for 20 years or more, and the property is managed and maintained appropriately, the Council can expect to see an increase in the value of the property as well as a net annual surplus of revenue.

- 4.4 The reasons for buying and owning property investments are primarily to:
- Facilitate and steer the regeneration of the town, contribute to meeting housing need, support economic prosperity and help deliver wider community benefits; and
 - Generate a net positive revenue income stream to support delivery of services to local people
- 4.5 A net positive revenue income stream can be achieved by buying property that has been well maintained, has a tenant with a good financial covenant occupying the property on a full repairing lease who pays a market rent to the council as landlord.
- 4.6 The Property, Finance and Legal teams undertake due diligence of both the property and the tenant before considering whether a property should be pursued for purchase. This involves independent property advice on the value of the property and the potential risks of re-letting it if the tenancy finishes. Advice includes an assessment of potential void periods, investing in the property and costs of maintaining the property if it is empty. These variables are input into a financial model and sensitivities modelled to determine whether or not the Council should proceed alongside assessing the performance of the property in the marketplace and ensuring there are no legal risks associated with the purchase.
- 4.7 In 2018, the Council's external auditor EY was asked to undertake a review of the property acquisition process and the associated financial model to ensure its robustness going forward. The conclusions of the review have informed a range of improvements to the process and the associated financial model.
- 4.8 As well as addressing the proposed improvements to processes and the strategy for investment property acquisition, this updated strategy sets out the changes which need to be considered in light of two new sets of statutory guidance issued by the Ministry of Housing, Communities and Local Government (MHCLG) in February 2018 relating to Minimum Revenue Provision and Local Government Investments.
- 4.9 The updated guidance on Minimum Revenue Provision (MRP) prevents local authorities purchasing investment properties or other capital assets without subsequently setting aside revenue funding to repay debt.
- 4.10 The guidance on Local Government Investments requires councils to approve an annual Treasury Strategy which addresses the security / liquidity and return (in that order of priority) of all investments; as well as risk and appropriate mitigations. In particular the guidance stresses councils do not have the power to "borrow in advance of need purely in order to profit from the investment of the extra sums borrowed" - this includes borrowing to purchase investment properties for the sole purpose of generating a revenue income stream. It goes on to state where a council chooses to disregard this latter requirement, the Strategy should clearly explain why it has ignored the Guidance and how risks of not achieving expected yields will be managed.
- 4.11 The Commercial Investment Strategy and associated protocol takes on board the new statutory guidance issued by MHCLG in February 2018.
- 4.12 All other things being equal, the Council would see its cash balances grow over

the MRP life of the asset such that at the end sufficient cash is available to repay the loan.

- 4.13 After the estimated holding period for the asset the Council will have built up sufficient cash resources to repay the outstanding borrowing and thus incur no further debt management costs. However, it will still hold an asset with a likely considerable value. Even if the building requires impairment, the land value itself is likely to have risen by inflation. The investment appraisal model recognises this residual value by assuming a capital receipt, which is then used to reduce existing debt and thereby future MRP charges. Any actual decision to dispose of or retain the property would be made at the appropriate point in the future and would take into account the overall capital and revenue position and outlook at that time.
- 4.14 Any impairment that occurs during the holding period is offset by a statutory override to general accounting practice that prevents any valuation reduction impacting on unusable reserves rather than usable balances. As such any net impairment only impacts the Council's overall position at the eventual disposal date and would impact on the value of a capital receipt ultimately achieved.

Location

- 4.15 The Council has up until now only invested in or near to the borough but could consider investing within a wider area in order to spread risk and where the investment meets the relevant criteria. The due diligence process to evaluate investment properties is the same regardless of the location of the property. The full report in Appendix 2 sets out a number of reasons why it is not advisable to look to acquire in just one location.
- 4.16 It is therefore proposed that the current position be amended to enable the Council to make strategic investment acquisitions outside of the Borough and Greater Reading area to include the Thames Valley Berkshire LEP area, adjoining LEP areas and other locations where the investment would support the overall aims of the Strategy

Joint Investments

- 4.17 It is also proposed that the Council may wish to consider approaching other Councils or local investment institutions with a view to sharing in future acquisitions, to spread risk and facilitate larger purchases which would otherwise be beyond the Council's available funding. The Strategy provides support to such an approach.

5.0 POLICY CONTEXT

- 5.1 The Council's policy context and priorities are set out in its Corporate Plan. The adoption of a revised Commercial Investment Strategy primarily supports three of those priorities:

- Securing the economic success of Reading
- Improving access to decent housing to meet local needs
- Ensuring the Council is Fit for the Future

6.0 FINANCIAL IMPLICATIONS

- 6.1 The Council's Capital Programme provides a budget of £150m in its three year Capital Programme (2019/20 - 2021/22) for the acquisition of new investment property. The resultant net income from these investments forms part of the assumptions in the MTFS. Failure to deliver this additional income will create a shortfall in the Council's budget position. The MTFS contains provision for risk and contingency (which includes the potential for some commercial income not to be secured as planned). Any failure to to achieve income taregts could potentially therefore be offset in the short to medium term by such provision. However, it will be entirely dependant on the delivery of other MTFS savings and there being sufficient headroom in the contingency sum. In the longer term the disposal of the asset or redevelopment to an alternative use would be considered.
- 6.2 A detailed due dilgience process is undertaken to ensure the investment meets the Council's financial objectives and provides surety in relation to all legal and property matters.
- 6.3 The Council's 19-20 MTFS includes a net income target (after provision for repayment of debt) of £750k, for rental income across the portfolio of investment properties. This represents just 0.54% of the overall net budget for the Council so does not pose a significant risk to the overall finances of the council.
- 6.4 Investment properties are re-valued in the accounts annually at fair value. Any fall in value is reversed out of the revenue account under statutory regulations. The Council has created a provision to manage potential liabilities in relation to its commercial property holdings.
- 6.5 By providing fully for MRP, the Council will repay the overall debt of the investment regardless of its annual valuation.

7.0 BACKGROUND PAPERS:

- Treasury Management Strategy 2019 /2020.

COMMERCIAL INVESTMENT STRATEGY

- 1.0 As Place-maker, the Local Authority plays a pivotal role in facilitating and contributing to the regeneration and economic prosperity of the Borough. Along with setting a strong vision for the area the Council has successfully used its land holdings, often in partnership with the development industry, to deliver well-balanced and sustainable development and infrastructure to meet the needs of the residential and business community.
- 2.0 The Council has a proven track-record in optimising its strategic property holdings to enable wider regeneration and economic growth. The Council needs to continue this role and make strategic land and property acquisitions that will both contribute to and be an enabler of economic growth and regeneration thereby delivering the Council's wider objectives.
- 3.0 The importance of regeneration in meeting Reading's future needs and securing the wider economic success of the sub-region area is best demonstrated by the new Reading Borough Local Plan. The Plan identifies 194 hectares of new development across the Borough, and sets an ambitious target to deliver 671 new homes per annum during the plan period to 2036, in order to meet objectively assessed needs. The need is for 406 of these new homes per annum to be affordable, which presents a significant challenge given local housing market conditions.
- 4.0 The constrained and predominantly urban nature of the Borough means it is inevitable that a significant element of future additional housing stock will come from either the redevelopment or conversion of existing commercial properties across the town. It is therefore appropriate for the Council to invest in suitable properties to secure a potential pipeline of suitable homes into the future.
- 5.0 At the same time, it is important that Reading provides a range of types of commercial floorspace to support economic development and growth, be that multi-national business, green tech companies or other SMEs. The Council already provides small flexible industrial start-up units at its Acre Road Business Park, but needs to expand and diversify its offer to support local businesses and to spread the risk across its portfolio.
- 6.0 The Council is currently working in partnership with the Thames Valley LEP to develop a new Local Industrial Strategy for Berkshire, and Reading is the principal sub-regional economic hub for the Thames Valley. The objectives of the BLIS will further inform the range and type of property investment that the Council should consider in order to achieve its wider objectives.
- 7.0 The Council will continue to keep its property portfolio under active review to ensure it remains appropriately balanced and incorporates a range of uses and property types in order to spread risk and therefore reduce any possible over-reliance on one particular sector. This will require a proactive asset management regime that not only maximises letting of existing space, but involves purchasing and disposing of particular assets at any one time to maintain the risk spread across the portfolio and in order to respond to changes in the commercial property market.

8.0 This is a long-term property investment strategy intended to ensure a well-balanced property portfolio with an over-all low risk spread that can contribute to achieving the Council's objectives, commercial property investments should ensure that the associated rental income is sufficient to cover the costs of borrowing and repayment. Ultimately, at the end of the loan period, the council will own outright a considerable physical asset and can choose to release the value of that asset if it so chooses.

9.0 The introduction of a streamlined framework within which the Council pursue strategic acquisitions and manage its existing holdings will enable the Council to maximise the value of its existing asset base, acquire land and property that will make a significant contribution to the town centre's regeneration and future development, increase business rates and council tax receipts and in the medium term, provide an income stream that could contribute to the provision of front line services.

10.0 The Investment Property Market

10.1 The UK commercial property investment market is very well established, attracts global investors and is defined as a 'mature asset class' with a range of new and established investors including institutions, pension funds, specialist property companies, charities, family trusts and individuals.

10.2 The Chartered Institute of Public Finance and Accountancy (CIPFA) defines investment property as "...used solely to earn rentals or for capital appreciation or both...". Returns from property ownership can be both income driven (through the receipt of rent) and by way of appreciation of the underlying asset value (capital growth). The combination of these is a consideration in assessing the attractiveness of a property for acquisition.

10.3 Property prices and returns are a function of the property type, condition, use and location, together with the lease structure and covenant strength of the tenant (in the case of a let property).

10.4 When investing in property the Council seeks to produce the best returns possible, whilst carrying an acceptable level of risk. The full vesion of the strategy provided in Part 2 of the agenda sets out the main mitigation measure in managing risk.

10.5 Any property asset coming onto the market could be for a number of reasons. Investors seek to buy and sell in many different circumstances - rebalancing their portfolio, seeking cash to influence balance sheet or share price, requirement for a more "liquid" asset, short term investment taking advantage of small capital growth, moving into different property classes, etc.

10.6 There is a risk to the Council regarding the liquidity of these investments based on how quickly they could be sold and if the price would be above or below market value. However, investment is made with the intention of retaining the properties in the long-term and not to gain a capital receipt at a later date, which does partly mitigate the risk. If a decision was made to sell one or more of the properties it is likely to take in the region of six months to a year before a capital receipt was received and any sale made based on a need to generate a receipt would be subject to the fluctuations of the market.

11.0 Approach

11.1 The factors the Council takes into account when considering the acquisition of property for investment purposes are set out in the full version of the strategy provided in Part 2 of the agenda

12.0 Risk Analysis

12.2 All potential acquisitions will be assessed using the following Criteria.

Risk	Mitigating action	Opportunities
Property, legal and finance matters are not fully interegated and understood.	Due diligence process including the use of third party experts in relation to property, legal and financial matters	
Loss of future rental income - due to void periods. Appetite for risk in dealing with voids when a tenant vacates is a key factor. Balancing potential rental growth and increased capital value against short term loss of rent and possible capital costs prelet.	The use of a prudent financial model is adopted that makes allowances for potential void and rent-free periods, as well as making provision for periodic capital investment to maintain the property to retain attractiveness. Ensure that covenant strength and lease length is acceptable and will contribute positively to spreading and mitigating risk across a diverse and balanced investment portfolio.	Market conditions can go up as well as down, with the Council benefitting from increased returns during an upturn.
Property market fluctuations – Property is a riskier asset than other asset classes because of its physical characteristics, which need to be managed and maintained. The Council may not achieve its target returns if market conditions significantly worsen or there is a marked change in a	Undertake appropriate due diligence and appoint specialist independent advisers and agents to act on behalf of the Council. Application, where appropriate of factors such as ‘smoothing’ which spreads an average income over a set period to mitigate the financial impact of	Market conditions can go up as well as down, with the Council benefitting from increased returns during an upturn, as well as an asset increasing in capital value over the medium term.

particular sector.

vacancy or rent free periods.
Target assets/locations where income is secured and rental growth identified.
Proactively manage the investment portfolio through both disposal and acquisition to ensure a well-balance and diverse portfolio that spread risks against various asset criteria.

Abortive costs –

It is almost inevitable that some transactions will not proceed and there will be abortive costs.

Good market intelligence and preliminary due diligence using an independent specialist adviser/agent should help mitigate this risk.

Communications –

perception the Council is spending in a time of austerity.

The Council cannot borrow to run services and the benefits of such investments help to providing core services.

The Council's exposure to risk of income shortfall or value falls is mitigated by the use of prudent modelling, contingency provisions and the full provision to repay debt over the life of the asset. In addition, the Council's overall exposure to risk from commercial investment property is managed by the limit imposed on the total value of assets set out in the approved capital programme.

13.0 Current Investments

13.1 The full vesion of the strategy provided in Part 2 of the agenda sets out the total value of the recent acquistions including the purchase of a property which is due to complete in ealry April.

13.2 The Council's adopted MRP policy determines the use of the annuity method in calculating the provision for debt repayment - in a similar manner to a private householder's repayment mortgage, the amount of principal repaid is lower in the early years but gradually increases year on year. Given that rental yields are likely to rise at each rent review / lease renewal date such a policy more closely matches capital financing costs to revenue income streams.

14.0 Acquisition Process & Protocol

14.1 The full vesion of the strategy provided in Part 2 of the agenda sets out the acquistion process and refers to Appendix A and B setting out the detailed

purchase process to be followed and initial evaluation matrix.

15.0 General Principles

15.1 The full vesion of the strategy provided in Part 2 of the agenda sets out the general principles and the requirements of the appraisal and business case

16.0 Resourcing

16.1 The Council should identify potential acquisition opportunities through a combination of in-house knowledge of the local market and selling agents that present potential investment opportunities. The appropriateness of a particular opportunity will be assessed by the Council's retained and independent specialist advisors, as part of the adopted acquisition protocol.

16.2 As the investment portfolio grows and diversifies, specialist resources will be retained to undertake proactive portfolio asset management to ensure that the return on investment is optimised and risk is managed.

The full vesion of the strategy considered in closed session provides two appendices setting out the detailed purchase process to be followed and initial evaluation matrix.

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READING BOROUGH COUNCIL

REPORT BY EXECUTIVE DIRECTOR OF RESOURCES

TO:	POLICY COMMITTEE		
DATE:	10 JUNE 2019		
TITLE:	REVALUATION DISCRETIONARY BUSINESS RATES RELIEF SCHEME / RETAIL RELIEF AND DISCRETIONARY RELIEF 2019/20		
LEAD COUNCILLOR:	CLLR BROCK	PORTFOLIO:	LEADERSHIP
SERVICE:	FINANCE	WARDS:	BOROUGHWIDE
LEAD OFFICER:	MATT DAVIS	TEL:	
JOB TITLE:	ASSISTANT DIRECTOR OF FINANCE	E-MAIL:	Matt.Davis@reading.gov.uk

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 To provide the Policy Committee with an update on Business Rates Reliefs awarded in 2017/18 and 2018/19 and details of the proposed Local Revaluation Discretionary Relief Scheme for 2019/20 (LRDRS).

The report also provides information regarding the change to retail relief for businesses with rateable values below £51,000 and advises no change to the Council's Discretionary Relief Scheme for 2019/20 (DRS).

2. RECOMMENDED ACTION

The Policy Committee are recommended to:

- 2.1 note the contents of the report and the changes to the Retail Relief scheme;
- 2.2 approve the proposed Local Revaluation Discretionary Relief Scheme for 2019/20; and
- 2.3 note that no changes are made to the Council's existing Discretionary Relief Scheme for 2019/20.

3. POLICY CONTEXT

- 3.1 The Council collects National Non-Domestic Rates (NNDR) under the Local Government Finance Act 1988. Reading is currently part of the Berkshire Pool and is retaining 75% of rates collected (the Pool authorities retained 100% in 2018/19, the first year of pilot status).

4. THE PROPOSAL

4.1 Current Position

- 4.1.1. The rateable value of all non-domestic properties are normally reassessed every 5 years, but the 2015 revaluation was deferred by two years and came into force on 1 April 2017.

4.1.2 Consequently the 2017 Revaluation saw considerable increases in bills for some ratepayers. As with previous revaluations, the Government introduced a transitional scheme to help with the phasing in of both increases and reductions. Whilst the transitional scheme provided some assistance, a large number of ratepayers still faced considerable increases in their bills and the Government subsequently introduced 3 further measures to provide support to businesses in April 2017:

- Supporting Small Businesses Relief
- New Local Discretionary Relief Scheme
- New Business Rate Relief Scheme for Pubs

4.1.3 In each case the Government expected billing authorities to use their discretionary powers under section 47 of the Local Government Finance Act 1988 to deliver these new reliefs.

4.2 Supporting Small Businesses Relief

4.2.1 Supporting Small Businesses Relief continued into 2018/19 for those ratepayers who faced large increases as a result of the loss of small business rate relief and Revaluation increases in 2017/18. For Reading Borough Council Supporting Small Business Relief applied to 42 businesses.

4.2.2 Its effect was to limit increases in business rates for small businesses with a rateable value of £15,000 or less to £600 per year (£50 per month). This maximum increase ensured those ratepayers who would have paid nothing or very little in 2016/17 would pay something going forward. The relief will be applied until either, the next revaluation in 2021 or, the ratepayers bill increases to the level their bill would have been without the relief whichever is first. Over the five years of the expected valuation period the maximum increase would therefore be £3,000 (5 years x £600).

4.3 Local Revaluation Discretionary Relief Scheme

4.3.1 In the Spring Budget 2017 the Chancellor announced £300m for local councils to provide business rates relief to businesses facing an increase in their business rates following the 2017 Revaluation. Reading's allocations were as follows:

- 2017 £1,014,492
- 2018 £492,000
- 2019 £203,000
- 2020 £29,000

4.3.2 Each billing authority was required to devise its own local Discretionary Relief Scheme for the 2017/18 and subsequent years.

4.3.3 The Government issued guidance (attached at Appendix B) on the formula they believed Local Authorities should follow and which the Council used to design its scheme for distributing the relief. In principle the Council's Scheme assists ratepayers whose property has a rateable value below £200k and where the revaluation increased the ratepayer's bill by more than 12.5%.

4.3.4 This relief is subject to State Aid Rules. State Aid legislation is the means by which the European Union regulates state funded support to businesses. Providing discretionary relief to ratepayers is likely to constitute State Aid.

- 4.3.5 Part way through the year, due to the difficulty awarding the relief, the Council amended its Scheme to meet the full business rates of voluntary sector and charitable partner organisations in the Borough. All of the 2017/18 was therefore allocated.
- 4.3.6 In 2018/19 the Scheme was amended to take account of the challenges faced in 2017/18 and Relief was focused in the first instance on smaller properties with RV's under £100,000, limiting bills to the equivalent of inflation only increases.
- 4.3.7 Support has also continued to be provided to voluntary sector and charitable partner organisations. However, it again has been difficult to award the support even though this year rather than asking the bill payer to apply for the relief it was awarded up front and businesses asked to inform us if they didn't think they should receive it due to state aid.
- 4.3.8 To date we have spent £288,080.30 of the £492,000 2018/19 allocation.
- 4.3.9 We propose (subject to State Aid checks) to give the remaining relief of £203,919.70 to the initial cohort of 2017/18 applicants. In general we propose that the State Aid position for the smaller properties will be checked on a "negative assurance" basis (i.e. we will assume it is not an issue and grant the relief), but in advising those eligible that if State Aid is an issue for them they should contact us, so the relief can be adjusted/removed.
- 4.3.10 The relief will be applied retrospectively on a pro-rata basis against their 2018/19 annual bill value. Any surplus on a rate payers 2018/19 account that arises as a result of this will be used to offset their 2019/20 liability.
- 4.3.11 2019/20
We propose for 2019/20 that we again focus our relief in the first instance on smaller properties with RV's under £100,000 using the same conditions as for 2018/19. If the value of relief is greater than the funds available, the relief will be applied pro-rata based on the 2019/20 annual bill value.
- 4.3.12 If there are funds remaining we will then consider our identified partners and charities.
- 4.3.13 And finally, whilst unlikely given the reduction in grant funding from previous years, if there are remaining funds available, it is recommended to give the relief to the initial cohort of 2017/18 applicants on a pro-rate basis (the same methodology as used for 2018/19).
- 4.3.14 We will review and submit a new proposal to the Policy Committee in February 2020 for the distribution of the 2020/21 funding allocation (albeit only £29,000).

4.4 Existing Discretionary Rate Scheme

- 4.4.1 No changes are proposed to the currently agreed scheme and therefore the existing arrangements would carry forward to 2019/20.
- 4.4.2 The Council's current scheme:

Allows consideration of applications for DRR based on the extent to which the application meets all of the following criteria:

- The extent to which the organisation helps Reading Borough Council meet local needs, and
 - The extent to which the organisation matches priorities set out in Reading Borough Council’s Corporate Plan, and
 - That the organisation will face hardship if support is not provided through DRR Maximum Discretionary Rate Relief Period
- 4.4.3 DRR will be granted for a maximum of 12 months. In granting DRR we will consider the sustainability of the organisation.
- 4.4.4 DRR will only be granted if there is a risk that the organisation will become unviable, and that the granting of DRR in the short term will make the organisation sustainable for a reasonable period in the future.

4.5 Retail Relief

- 4.5.1 The Government announced in the Budget on 29 October 2018 that it will provide a business rates Retail Discount scheme for occupied retail properties with a rateable value of less than £51,000 in each of the years 2019/20 and 2020/21. The value of discount should be one third of the bill, and must be applied after mandatory reliefs and other discretionary reliefs funded by section 31 grants have been applied. Where an authority applies a locally funded relief, for instance a hardship fund, under section 47 this must be applied after the Retail Discount.
- 4.5.2 Central government will fully reimburse local authorities for the local share of the discretionary relief (. The Government expects local government to apply and grant relief to qualifying ratepayers from the start of the 2019/20 billing cycle.
- 4.5.3 In general we propose that the State Aid position for the smaller properties will be checked on a “negative assurance” basis (i.e. we will assume it is not an issue and grant the relief), but in advising those eligible that if State Aid is an issue for them they should contact us, so the relief can be adjusted/removed.
- 4.5.4 For Reading Borough Council it is estimated that this relief will apply to circa. 500 properties.

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 The purpose of this section is to ensure that proposals contained in reports are in line with the overall direction of the Council by meeting at least one of the Corporate Plan priorities:
1. Safeguarding and protecting those that are most vulnerable;
 2. Providing the best start in life through education, early help and healthy living;
 3. Providing homes for those in most need;
 4. Keeping the town clean, safe, green and active;
 5. Providing infrastructure to support the economy; and
 6. Remaining financially sustainable to deliver these service priorities.

5.2 The proposed scheme helps support the local economy and by only spending the money Government has made available contributes to financial stability and healthy environment for all.

6. COMMUNITY ENGAGEMENT AND INFORMATION

6.1 Our Precepting authorities will be sent a copy of the proposed schemes for comment.

7. EQUALITY IMPACT ASSESSMENT

7.1 Equalities considerations will be included in the monitoring of the application of the reliefs, once agreed, to ensure that we are able to demonstrate that relief is awarded fairly and in accordance with the stated eligibility.

8. LEGAL IMPLICATIONS

8.1 Section 47 of the Local Government Finance Act 1988 and subsequent amending legislation provides the criteria for awarding discretionary rate relief to certain categories of non-domestic ratepayer.

8.2 Section 69 of the Localism Act 2011 provides a new discretionary power to reduce business rates for any local ratepayer. It is this new power that the Government is directing billing authorities to use to award the new categories of relief.

8.3 Relief from taxes, including non-domestic rates, can constitute state aid under European Union legislation. There are block exemptions from the state aid rules where the aid is below a de minimis level. The de minimis level applies to all de minimis aid received, including other Government subsidies or grants, in addition to any rate relief given as a de minimis aid. It will be for the Council to ensure that any relief granted does not transgress state aid rules. The de minimis threshold is €200,000 from all sources to the recipient as a whole over a rolling period of three years.

9. FINANCIAL IMPLICATIONS

9.1 The Council will receive funding from government for all the above reliefs granted with the exception of its own discretionary rate relief scheme. The funding will be re-claimed retrospectively via the yearly NNDR1 and NNDR3 returns to government.

9.2 There is a risk to the authority where the Valuation Office allows an appeal this may have a consequential impact on the allocation of the discretionary relief, we are proposing that where the full funding pot we have been granted has been distributed within the financial year, those that become eligible in year but no funding is exhausted, that they be held on a waiting list, and if funding becomes available because another ratepayer has vacated or had a change that results in them no longer qualifying for their original relief amount, that this released funding is then made available to the next eligible ratepayer on the list. This will keep the cost of the scheme within the funding pot available.

10. BACKGROUND PAPERS

10.1 Business Rates Information Letter 2
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/598272/BRIL_2-2017_Budget_Measures.pdf

10.2 Business Rates Information Letter 1
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778996/BRIL_1_-_2019_-_General_Information.pdf

- 10.3 New Burdens Funding
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/768817/New_burdens_-_software_costs.pdf
- 10.4 Appendix A - Discretionary Rate Relief Guidance
- 10.5 Appendix B - **Revaluation Relief and Retail Relief Guidance and Criteria**

DISCRETIONARY RATE RELIEF GUIDANCE

APPENDIX A

The authority to grant DRR is delegated to the Head of Customer Services in consultation with the Head of Finance.

Criteria

We will consider applications for DRR based on the extent to which the application meets **all** of the following criteria:

- The extent to which the organisation helps Reading Borough Council meet local needs

AND

- The extent to which the organisation matches priorities set out in Reading Borough Council's Corporate Plan

AND

- That the organisation will face hardship if support is not provided through DRR

Maximum Discretionary Rate Relief

When granted, DRR will end on the 31st of March at the end of the financial year in which it was granted. It will be necessary to submit a new application for each new financial year.

DRR will only be considered after all other eligible mandatory and discretionary reliefs have been applied.

In granting DRR we will consider the sustainability of the organisation.

DRR will only be granted if there is a risk that the organisation will become unviable, and that the granting of DRR in the short term will make the organisation sustainable for a reasonable period in the future.

There are a number of exceptions:

- Early Years Providers will be considered for DRR as part of a funding formula that targets children and families in greatest need. Both

privately owned and voluntary managed Early Years providers will be eligible. Please contact the Early Years and Play Services on 0118 937 3737.

- Voluntary, not for profit and private sector providers that are currently commissioned to provide services on behalf of Reading Borough Council will not generally be considered for DRR as they should already have demonstrated that they are financially viable at the start of the arrangement.

How to apply

Applications should be submitted by the 30th September following the financial year for which the application is being made. No further backdating will be considered.

Applicants will be informed of the outcome 6 weeks from application, providing all the required documentation has been received.

- If successful DRR will be applied from the 1st of April of the financial year in which the relief has been applied for, or the date from which they became liable should this be later (providing that the application has been submitted within the allowable timescale above).
- Applicants should continue to pay rates until a decision is made.

An application for DRR for charitable / not for profit organisations is available to [download](#). If you need a hard copy please contact Business Rates on 0118 937 3727 or business.rates@reading.gov.uk.

Where to send your application form

Business Rates

Reading Borough Council

Civic Offices

Bridge Street

RG1 2LU

APPENDIX B

REVALUATION RELIEF AND RETAIL RELIEF

ELIGIBILITY FOR REVALUATION DISCRETIONARY RATE RELIEF GUIDANCE

- i) The ratepayer must have been in occupation on 31/03/2017. No relief will be awarded to those taking up occupation on or after 01/04/2017.
- ii) No relief will be awarded if the property is empty on the 01/04/2017 (i.e. i) & ii) together mean only ratepayers occupying property at the time the Revaluation comes into effect should be able to benefit from the discretionary scheme).
- iii) Relief will be terminated on liability ending or the property becoming vacant & empty.
- iv) All other mandatory reliefs must have been applied for/considered prior to an application for Local Discretionary Relief being considered.
- v) The 2017 RV must be under £200,000 (and a “better buy” calculation will be carried out to ensure no-one is disadvantaged if they are already in receipt of other spring budget reliefs)
- vi) Where a property is formed following a split or merger after 31/03/2017, and the occupation has not in essence changed, and qualified before the split or merger a new calculation will be carried out (to ensure the ratepayer is neither advantaged nor disadvantaged from the split/merger).
- vii) Where there is an increase in RV and they were in occupation on 31/03/2017 relief will continue to be awarded if the RV remains under £200,000
- viii) Full recalculations will be made where reductions in RV for either the 2010 or 2017 RV are made (as these are highly likely to impact the rates payable based on the new list)
- ix) An application form must be completed by, or on behalf of the ratepayer. All applications will be considered on their merits. Relief is intended for those that have fallen out of Small Business Rate Relief or are facing large increases. Relief will apply from 1st April 2017. A new application may be required in each subsequent year if applicable (though we will give consideration in due course to a simplified process for 2018/19 for ratepayers facing further large increases whose essential circumstances are unchanged, noting that much less money is available for relief in the later years)

Exclusions

- i) Relief cannot be awarded to precepting bodies (i.e. the Fire & Police Authority), or the Council's own property.
- ii) Applications will not be invited from banks, building societies or other major financial institutions.
- iii) Applications will not be invited from large multi-national businesses or large chains (given likely State Aid issues – see below).
- iv) Applications will not be invited from the NHS, GP surgeries
- v) Money Lending Shops & Betting Shops will be excluded
- vi) Applications will not be invited from charities, as they already benefit from 80% charitable relief.
- vii) Application from ratepayers who have had 2 summonses within the last 3 years will not normally receive relief (on the basis that ratepayers who do not organise paying their bills properly should not benefit from a Council discretionary scheme).

DEFINITIONS FOR RETAIL RATE RELIEF

The Government considers shops, restaurants, cafes and drinking establishments to mean:

- i. Hereditaments that are being used for the sale of goods to visiting members of the public:
 - Shops (such as: florists, bakers, butchers, grocers, greengrocers, jewellers, stationers, off licences, chemists, newsagents, hardware stores, supermarkets, etc)
 - Charity shops
 - Opticians
 - Post offices
 - Furnishing shops/ display rooms (such as: carpet shops, double glazing, garage doors)
 - Car/ caravan show rooms
 - Second hand car lots
 - Markets
 - Petrol stations
 - Garden centres
 - Art galleries (where art is for sale/hire)
- ii. Hereditaments that are being used for the provision of the following services to visiting members of the public:

- Hair and beauty services (such as: hairdressers, nail bars, beauty salons, tanning salons)
- Shoe repairs/ key cutting
- Travel agents
- Ticket offices e.g. for theatre
- Dry cleaners
- Launderettes
- PC/ TV/ domestic appliance repair
- Funeral directors
- Photo processing
- Tool hire
- Car hire

iii. Hereditaments that are being used for the sale of food and/ or drink to visiting members of the public:

- Restaurants
- Takeaways
- Sandwich shops
- Coffee shops
- Pubs
- Bars

In order to help us apply the test above the Government has advised they do not consider the following as eligible for this relief:

- Financial services (e.g. banks, building societies, cash points, bureaux de change, payday lenders, betting shops, pawn brokers)
- Other services (e.g. estate agents, letting agents, employment agencies)
- Medical services (e.g. vets, dentists, doctors, osteopaths, chiropractors)
- Professional services (e.g. solicitors, accountants, insurance agents/ financial advisers, tutors)
- Post office sorting offices
- Leisure such as cinemas, theatres and museums,
- Nightclubs, or music venues
- Sport or physical recreation (e.g. gyms)

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READING BOROUGH COUNCIL

REPORT BY MONITORING OFFICER

TO:	POLICY COMMITTEE		
DATE:	10 JUNE 2019		
TITLE:	APPOINTMENTS TO OUTSIDE BODIES		
LEAD CLLR:	COUNCILLOR BROCK	PORTFOLIO:	LEADERSHIP
SERVICE:	LEGAL AND DEMOCRATIC SERVICES	WARDS:	BOROUGHWIDE
AUTHOR:	SIMON HILL	TEL:	0118 937 2303/ Internal 72303
JOB TITLE:	PRINCIPAL COMMITTEE ADMINISTRATOR	E-MAIL:	simon.hill@reading.gov.uk

1. EXECUTIVE SUMMARY

- 1.1 This report asks the Policy Committee to make appointments or nominations to outside bodies for the Municipal Year 2019/20, or longer where required. A schedule of outside body appointments showing the Group Leaders' recommendations will be circulated prior to the meeting.

2. RECOMMENDED ACTION

- 2.1 That the Committee make appointments or nominations to the listed outside bodies;
- 2.2 That the appointments or nominations be made on an "or nominee" basis where the organisation in question is willing to accept this arrangement.

3. OUTSIDE BODIES

- 3.1 No new appointments have been added to the register in 2018/19.
- 3.2 The following bodies have been removed as they are no longer operating:
- Berkshire Historic Environment Forum
 - Local Strategic Partnership
 - Riverside Day Nursery
 - South Reading Educational Trust
- 3.3 There are a number of other appointments not listed, because they have a longer term of appointment and are therefore not becoming vacant in 2019.

- 3.4 Appointments to some outside bodies were made by the Policy Committee motion at the Council AGM on 22 May 2019 - see the Minutes elsewhere on the agenda for details.

5. LEGAL AND FINANCIAL IMPLICATIONS

- 5.1 Attendance by Councillors appointed to the above bodies will be an approved duty for the purposes of the Council's scheme made in accordance with the provisions of the Local Authorities (Members' Allowances) Regulations 1991. This means that travel and subsistence claims may be made in respect of expenses incurred in attending meetings.
- 5.2 The Council cannot legally provide personal liability cover for representatives serving on outside bodies (*Burgoine v Waltham LBC 1996*) and it is the responsibility of the outside body to secure the appropriate insurance and personal liability cover for people on it. Local authorities do not have a legal power to extend their insurance policies to cover the liabilities of third parties.
- 5.3 All Councillors, officers and other people appointed by Reading - and any other local authority - are therefore advised of the need to check directly with the outside body about its insurance cover, and how far it protects them.
- 5.4 Non-Councillors who are appointed to represent the Borough on outside bodies may claim financial loss allowance and travel and subsistence, if applicable.

6. CONTRIBUTION TO STRATEGIC AIMS

- 6.1 Representation on joint committees and outside bodies gives the Council an opportunity, through its representatives, to work with partner organisations to achieve the vision and priorities set out in the Corporate Plan.

7. COMMUNITY ENGAGEMENT AND INFORMATION

- 7.1 Representation on outside bodies gives the Council an opportunity, through its representatives, to engage with the community on matters that affect the Borough.

8. BACKGROUND PAPERS

Outside Bodies correspondence and questionnaires.