

To: Councillor Brock (Chair)
Councillors Page, Ennis, Barnett-Ward,
Duveen, Emberson, Hoskin, McElroy,
McEwan, Pearce, Robinson, Rowland,
Skeats, Stanford-Beale, Stevens, Terry and
White

Direct: ☎ 0118 9372303

15 September 2021

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

NOTICE OF MEETING - POLICY COMMITTEE 23 SEPTEMBER 2021

A meeting of the Policy Committee will be held on Thursday, 23 September 2021 at 6.30 pm in the Council Chamber, Civic Offices, Reading, RG1 2LU. The Agenda for the meeting is set out below.

- | | | | |
|----|---|---------------------|-----------------|
| 1. | CHAIR'S ANNOUNCEMENTS | | |
| 2. | DECLARATIONS OF INTEREST | | |
| 3. | MINUTES | | 5 - 16 |
| 4. | PETITIONS AND QUESTIONS | | |
| | To receive any petitions from the public and any questions from the public and Councillors. | | |
| 5. | DECISION BOOKS | | 17 - 24 |
| 6. | CEMETERY AND CREMATORIUM RULES AND REGULATIONS | BOROUGH WIDE | 25 - 88 |
| | This report sets out the results of the Bereavement Services Public Consultation and seeks approval for the revised Cemetery & Crematorium Rules & Regulations and other related proposals. | | |
| 7. | BURIAL LAND OPTIONS AND CONSIDERATIONS | BOROUGH WIDE | 89 - 104 |
| | This report sets out options and considerations for potential land acquisition for burials beyond 2024/25. | | |

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.

8.	AWARD OF CONTRACT - ACCOMMODATION WITH SUPPORT FOR YOUNG PEOPLE YMCA READING	BOROUGH WIDE	105 - 114
	This report seeks approval to award a contract for the provision of Accommodation with Support for Young People to YMCA Reading.		
9.	ARTICLE 4 DIRECTION TO REMOVE PERMITTED DEVELOPMENT RIGHTS THAT WOULD RESULT IN RESIDENTIAL DEVELOPMENT	BOROUGH WIDE	115 - 304
	This reports recommends making a non-immediate Article 4 direction to remove certain permitted development rights that would result in new residential dwellings across the town centre, district and local centres, core employment areas and a number of other commercial areas.		
10.	FLEET REPLACEMENT PROGRAMME	BOROUGH WIDE	305 - 314
	This report seeks scheme and spend approval for the Vehicle Replacement Programme as part of Capital Programme 2021-23.		
11.	PROPOSED CHANGES: LOCAL COUNCIL TAX REDUCTION SCHEME	BOROUGH WIDE	315 - 330
	This report sets out a range of options to make amendments to the Local Council Tax Reduction Scheme for the 2022/23 financial year which would reduce administrative processes for both customers and staff and provide an increased level of support.		
12.	ACCESSIBLE INFORMATION AND COMMUNICATIONS POLICY	BOROUGH WIDE	331 - 376
	This report presents a draft Accessible Information and Communications Policy to support the Customer Experience Strategy.		
13.	2021/22 QUARTER 1 PERFORMANCE AND MONITORING REPORT	BOROUGH WIDE	377 - 446
	This report sets out the projected revenue and capital outturn positions for 2021/22 for both the General Fund and the Housing Revenue Accounts as at the end of June 2021 (Quarter 1) and performance against the measures of success published in the Council's Corporate Plan.		

ITEMS FOR CONSIDERATION IN CLOSED SESSION

14. 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”

15. DECLARATIONS OF INTEREST FOR CLOSED SESSION ITEMS

16. CIVIL ENFORCEMENT (PARKING) CONTRACT AND PARKING (MOTOR VEHICLE) STRATEGY - UPDATE	BOROUGH WIDE	447 - 550
---	-------------------------	----------------------

WEBCASTING NOTICE

Please note that this meeting may be filmed for live and/or subsequent broadcast via the Council's website. At the start of the meeting the Chair will confirm if all or part of the meeting is being filmed. You should be aware that the Council is a Data Controller under the Data Protection Act. Data collected during a webcast will be retained in accordance with the Council's published policy.

Members of the public seated in the public gallery will not ordinarily be filmed by the automated camera system. However, please be aware that by moving forward of the pillar, or in the unlikely event of a technical malfunction or other unforeseen circumstances, your image may be captured. **Therefore, by entering the meeting room, you are consenting to being filmed and to the possible use of those images and sound recordings for webcasting and/or training purposes.**

Present: Councillor Brock (Chair);
Councillors Page (Vice-Chair), Ennis, Barnett-Ward, Emberson, Hoskin, McElroy, McEwan, Robinson, Rowland, Stanford-Beale, Stevens, Terry and White

In remote attendance (non-voting) Councillor Duveen

Apologies: Councillor Skeats

RESOLVED ITEMS

15. MINUTES

The Minutes of the meeting held on 14 June 2021 were agreed as a correct record and signed by the Chair.

16. QUESTIONS

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

	<u>Questioner</u>	<u>Subject</u>	<u>Reply</u>
1.	Richard Stainthorp	School Capacity in September	Cllr Pearce

Questions on the following matters were submitted by Councillors:

	<u>Questioner</u>	<u>Subject</u>	<u>Reply</u>
1.	Cllr White	Greenwich leisure memberships more expensive	Cllr Hoskin
2.	Cllr White	Closed Public Toilets	Cllr Barnett-Ward

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

17. DECISION BOOKS

The Assistant Director of Legal & Democratic Services submitted a report listing the Decision Books that had been published since the report to the meeting of the Committee held on 14 June 2021.

Resolved -

That Decision Book Nos 633-634 be noted.

18. THE AVENUE SCHOOL EXPANSION

The Executive Director of Economic Growth and Neighbourhood Services submitted a report seeking scheme and spend approval for the capital investment required to convert The Avenue Centre (TAC) building. The following documents were attached to the report:

- Appendix A - Equality Impact Survey
- Appendices B to D - Pupil Planning data

The report noted that in the November 2020 budget setting exercise, the Avenue Centre had been identified as an opportunity to reduce property running costs, and a savings proposal to discontinue RBC/BFFC's use of the building as an office had been included in the Medium-Term Financial Strategy. Once the building had been vacated, it was proposed to convert it to school use and transfer the site to the school (The Avenue School Special Needs Academy Trust) to provide 60 additional Special Educational Needs and Disability (SEND) places, enabling the school to increase their capacity from 175 to 235 pupils. The cost of the refurbishment would come from the overall Department for Education Basic Need Grant of which there was £5 million allocated in the Capital Programme which had been approved at full Council on 23 February 2021 (Minute 19 refers).

The report explained that the numbers of required SEND places in Reading was continuing to rise. The Avenue School had reached its full capacity of 175 students despite having expanded in 2017 by 25 places and again in 2019 to accommodate another 30 pupils. Other maintained SEND schools, both within the borough and out of borough, were also at full capacity. The additional spaces at The Avenue School and 75 places at the co-commissioned Oak Tree School in Wokingham Borough could reduce the number of more expensive placements at independent or non-maintained schools and related transportation costs and provide a potential saving from the High Needs block. Appendix B indicated a potential saving of £1.5m from 2022 to 2026.

The report explained that in order to deliver the additional SEND school placements and revenue saving, staff and tenants who had used the building prior to the COVID pandemic would need to be relocated. This would require moving staff located there to other Council locations, including increased working from home where appropriate. The report therefore sought authority for officers to proceed with facilitating the transition by agreeing and entering appropriate agreements with current occupiers of TAC and partnership organisations.

Resolved -

- (1) That the release and spend of the £5 million budget for the project as identified in the Council's approved Capital Programme February 2021 be approved;

- (2) That the Executive Director for Economic Growth and Neighbourhood Services, in consultation with the Lead Councillors for Education and Strategic Environment, Planning and Transport, the Director of Finance and the Assistant Director of Legal and Democratic Services be authorised to:
- a) Tender and enter into contracts for the refurbishment and new building works to the Avenue Centre;
 - b) Agree and enter appropriate agreements with current occupiers of the Avenue Centre and partnership organisations to facilitate the exit of current occupiers from the building and relocation of these parties within the Council's property portfolio;
 - c) Agree and enter into the academy lease with The Avenue School Special Needs Academy Trust in respect of the newly refurbished Avenue Centre;
- (3) That the Assistant Director of Legal & Democratic Services be authorised to enter into the necessary legal agreements;
- (4) That the progress and issues connected with the vacation of the building to enable it to be converted and transferred to achieve the revenue savings target be noted.

19. ROUGH SLEEPER DRUG AND ALCOHOL TREATMENT GRANT

The Executive Director of Adult Care and Health Services submitted a report setting out a proposal to award the Public Health England Rough Sleeper Drug and Alcohol Treatment Grant. An Equality Impact Assessment was attached to the report at Appendix 1.

The report noted that the Ministry of Housing, Communities and Local Government (MHCLG) and the Department of Health and Social Care (DHSC), made £262m available over the next four years for drug and alcohol treatment and related provision, specifically to meet the needs of people experiencing rough sleeping who had drug and alcohol dependence needs. In August 2020, it had been announced that 2020-21 funding would focus on providing additional resources in the MHCLG 43 Taskforce Priority Areas. Reading was one of these priority areas having a higher number of people sleeping rough who had been moved into emergency accommodation during the COVID-19 pandemic. The purpose of the funding was to boost structured drug and alcohol treatment services, to account for additional costs from increased access and engagement from the rough sleeping population with consideration being given to how existing services could find ways to adapt, improve or extend their support to rough sleepers.

The report explained that Public Health England (PHE) had invited the submission of proposals by local authorities for the Rough Sleeper Drug and Alcohol Treatment Grant funding and that a proposal had been developed with the local drug and alcohol provider Change, Grow, Live (CGL) based on an evidence-based model piloted in one of its

POLICY COMMITTEE MEETING MINUTES - 12 JULY 2021

Southampton services. Reading had been informed of the success of its proposal in late December 2020, with a service delivery commencement date of January 2021. £637k grant funding had been awarded to spend in Quarter 4 2020-21, although this funding could now be rolled over into 2021-22.

The report set out a proposal to award the PHE Rough Sleeper Drug and Alcohol Treatment Grant in two phases. For Phase one (January 2021-December 2021) it was recommended that the core drug and alcohol provider CGL be awarded the grant to provide the evidence-based model submitted in Reading's proposal to PHE for year one. This would be a pilot project in order to ensure the proposal was fit for purpose and to give time to adjust requirements and draw up a specification for future requirements. For Phase two (a possible four years from August 2021) it was proposed that an accelerated open procurement process be undertaken in respect of any future funding from PHE for the same purpose. Phase 2 would allow any provider to bid for the contract and any staff already supporting the rough sleeping population would if applicable transfer to the new provider in line with the TUPE Regulations.

Resolved -

- (1) That the contract for provision of Rough Sleeper Drug and Alcohol Treatment service for the full value of the Year one (FY2021-22) allocation be awarded to CGL commencing on 1 January 2021 pursuant to Regulation 32 of the PCR 2015;**
- (2) That it be noted that the Year one allocation was currently £637,000 together with any further funding allocated by PHE during 21/22 to provide the pilot project, as described in Reading's proposal and approved by PHE for Year one;**
- (3) That the services be re-tendered through an accelerated open procurement for the Rough Sleeper Drug and Alcohol Treatment Grant (Rough Sleeper Grant Phase 2) (for a period of up to 4 years);**
- (4) That the Executive Director Social Care and Health, in consultation with the Lead Councillor for Health, Wellbeing and Sport and the Assistant Director of Legal & Democratic Services be authorised to award the new Rough Sleeper Grant Phase 2 contract for a period of up to four years commencing in January 2022.**

20. CUSTOMER EXPERIENCE PROGRAMME ANNUAL UPDATE

The Executive Director of Economic Growth and Neighbourhood Services and Deputy Chief Executive submitted a report updating the Committee on the successes achieved in year 1 of the Council's Customer Experience Strategy, lessons learned and plans for year 2. The following documents were attached to the report:

- Appendix 1 - Service Reviews outputs
- Appendix 2 - Data Dashboard

The report noted that the Council's Customer Experience Strategy (2020-2024) had been adopted in January 2020 (Minute 67 of the meeting held on 29 January 2020 refers) and set out a vision to achieve the best possible experience for the Council's customers. Ultimately, the Strategy would facilitate a culture and channel shift, by providing a 24/7 online service, designed around the customer, where customers could connect with the Council as and when it suited them. The majority of queries that could not be resolved online would be answered at first point of contact by a central Customer Fulfilment team.

The report explained that the strategy included a high-level roadmap of transformation over four years and was proposed to be delivered in one-year phases of activity. In Year 1, despite members of the delivery team being re-deployed to work on the Council's response to Covid-19 for part of the year, the Programme had made significant progress on discovery and foundational work. The report gave an overview of the achievements to date, covering areas including Service Reviews, Data and Insight and Building Digital Foundations. It also summarised the initiatives not progressed, and lessons learned, and set out the outputs, outcomes, benefits and impact of work planned for Year 2 which covered areas including Service Reviews and Delivery of Process and Digital Improvements.

Resolved -

That the progress made in year 1 of the Customer Experience Programme, and the work to be progressed in year 2, be noted.

21. DIGITAL TRANSFORMATION STRATEGY

The Deputy Chief Executive submitted a report setting out for approval a draft Digital Transformation Strategy 'Connected Reading', together with a recommended work programme for year 1, known as the Digital Accelerator Programme. The draft Strategy was attached to the report at Appendix 1.

The report explained that the proposed vision for the Council's Digital Strategy was 'Strong, connected relationships with residents, businesses and partners underpin a healthy, thriving and inclusive borough.' The Strategy proposed five themes against which action should be pursued to turn the vision into reality: Developing Foundations, Sharing Information, Improving Skills, Connecting Communities and Enabling Investment.

The report noted the significant potential of Digital to deliver direct financial benefit to the Council, with the Medium Term Financial Strategy agreed by Council in February 2021 including £5m of annual savings to be realised by 2023/24 that had dependencies on Digital. This included £1m of savings from the Customer Experience Strategy agreed by Policy Committee in January 2020, which identified explicit dependencies on Digital, most notably the introduction of a customer experience platform. The Council had already taken a first enabling step through putting in place new arrangements for its core ICT services through the implementation of the Future Operating Model from April 2021. To realise the benefits of digital transformation, however, it was necessary to modernise

POLICY COMMITTEE MEETING MINUTES - 12 JULY 2021

ways of working and overcome some significant technical and business obstacles, including the need to replace a number of core business applications and a current lack of technical capacity to support change.

The report set out and recommended implementation of the Digital Accelerator Programme, with the objectives of delivering demonstrable benefit now and building people, process and technology capability to deliver further benefit in the future. The proposed approach was to build functional and system capabilities in a cross-cutting way, for example by implementing a payment system that would ultimately be used by all parts of the business. A review would be carried out in the autumn and a revised business case submitted to the Committee, to provide confidence that as a minimum the remaining digital-dependent MTFs savings could be realised and to inform the 2022 budget setting process.

Resolved -

- (1) That the Connected Reading Digital Strategy as set out at Appendix 1 be approved;**
- (2) That the Year 1 Digital Accelerator work programme set out in report and in the business case at Appendix 2 be agreed;**
- (3) That it be noted that a report on progress and an updated business case would be brought to Policy Committee in the autumn of 2021, prior to budget-setting, together with detailed proposals for future work.**

22. DRAFT DESIGN GUIDE FOR SHOPFRONTS - SUPPLEMENTARY PLANNING DOCUMENT

The Executive Director of Economic Growth and Neighbourhood Services submitted a report seeking approval to undertake community involvement on a Draft Design Guide to Shopfronts SPD (attached to the report at Appendix 1) to provide guidance on how planning applications for applications affecting shopfronts would be decided.

The report noted that, with the new Reading Borough Local Plan having been adopted in November 2019, the Council was in the process of publishing a number of Supplementary Planning Documents (SPDs), which gave further guidance on the implementation of policies within the Local Plan. Currently, Reading did not have an adopted Design Guide to Shopfronts SPD and there was therefore limited guidance for both applicants and planning officers in determining planning decisions. Establishing such guidance would be timely particularly as the Council began to deliver the Reading Heritage High Streets Action Zone programme. The Guide would apply to shopfronts across the whole Borough and additionally, as the nature of the high street was changing, would provide advice for conversions of shopfronts to residential use.

The report explained that the draft document would be subject to a consultation, to begin in July 2021 and extended to eight weeks due to the school summer holidays.

POLICY COMMITTEE MEETING MINUTES - 12 JULY 2021

Responses received would be considered in preparing a final draft SPD which was intended to be adopted in Autumn 2021.

Resolved -

- (1) That the Draft Design Guide for Shopfronts SPD (Appendix 1) be approved for consultation;
- (2) That the Assistant Director of Planning, Transport and Regulatory Services be authorised to make any minor amendments necessary to the SPD that did not alter the policy direction, in consultation with the Lead Councillor for Strategic Environment, Planning and Transport, prior to consultation.

23. QUARTER 4 PERFORMANCE REPORT (2020/21)

The Director of Finance submitted a report setting out the provisional revenue and capital outturn positions for the Council's General Fund and Housing Revenue Account (HRA) for 2020/21. The following documents were attached to the report:

- Appendix 1 - General Fund Outturn;
- Appendix 2 - Covid-19 Grants;
- Appendix 3 - Housing Revenue Account (HRA) Outturn;
- Appendix 4 - Capital Programme Outturn;
- Appendix 5 - Savings;
- Appendix 6 - Delivery Fund;
- Appendix 7 - Reserves Position as at 31st March 2021;
- Appendix 8 - Performance Outturn.

The report noted that the Covid-19 pandemic had resulted in a unique set of financial challenges for councils around the country, with income levels dropping; costs increasing; savings projects being de-prioritised in order to focus on the delivery of critical front-line services; and large-scale financial support programmes being implemented. The budget had been based upon a pre-pandemic set of assumptions that had had to be continually revised and adjusted throughout the year and there had been major challenges in monitoring financial performance against the budget. A prudent approach had been adopted in assessing the financial implications of the pandemic in order to protect the long-term financial stability of the Council.

The report explained that there was an overall General Fund positive net variance of £12.762m. The combined gross revenue pressures for 2020/21 as a result of Covid-19 totalled £16.448m, which included £1.643m of pressures in Brighter Futures for Children that the Council had agreed to fund. Funding received from Central Government included £13.269m of Central Government general support grant, £5.842m in compensation for lost income from sales, fees & charges, and £1.305m furlough grant. This had left a net variance of £3.968m of unallocated Covid-19 grant funding that was proposed to be rolled forward into an earmarked reserve to be used to mitigate the ongoing financial impact of the pandemic. It was also proposed that the £0.126m positive

POLICY COMMITTEE MEETING MINUTES - 12 JULY 2021

variance on the Joint Legal Team (JLT) within Legal & Democratic Services be carried forward to fund JLT-specific invest to save projects, the £0.313m positive variance against IT & Digital be carried forward to contribute to the funding of the Digital Strategy, and that the remaining balance of £8.355m be released back to replenish reserves that had been used in order to deliver a balanced budget for 2021/22.

The original budget for 2020/21 had included assumed savings of £15.344m, including £2.539m of savings brought forward from the previous year. A total of £7.579m of ongoing savings had been delivered in 2020/21, and £2.640m of savings had been removed as part of the 2021/22 budget setting process on the basis that they were no longer deemed deliverable. This left a residual balance of £5.125m to be carried forward for delivery in 2021/22. The shortfall on the savings target had been fully mitigated by services in-year and the balance of £5.125m would be added to the £15.083m of savings already included in the 2021/22 budget to give a revised savings target of £20.208m.

The report also stated that the provisional Housing Revenue Account outturn position was a £9.306m surplus/return to reserves and that the provisional General Fund Capital Programme outturn was a £29.142m positive variance against the budget of £67.812m. The provisional HRA Capital Programme outturn was a £4.308m positive variance against the budget of £20.457m. The report also sets out performance against the measures of success published in the Council's Corporate Plan.

Resolved -

(1) That the following be noted:

- a) The provisional General Fund revenue outturn position for 2020/21 was a £12.762m positive net variance;
- b) The provisional Housing Revenue Account outturn position for 2020/21 was a £9.306m transfer to the HRA Reserve;
- c) The provisional General Fund Capital Programme outturn position for 2020/21 was a £29.142m positive net variance;
- d) The provisional HRA Capital Programme outturn position for 2020/21 was a £4.308m positive net variance;
- e) £7.579m of agreed savings had been delivered in year with £5.125m of non-delivered savings being carried forward into 2021/22;
- f) £3.256m of Capital Receipts had been used to fund transformation in accordance with the Capitalisation Directive (Appendix 4);
- g) The performance achieved against the Corporate Plan success measures as set out in Section B of the report and Appendix 8;

(2) That the following be approved:

POLICY COMMITTEE MEETING MINUTES - 12 JULY 2021

- a) The service requests to roll-forward funds totalling £0.439m into 2021/22 to complete future programmes of work;
- b) That £3.968m of un-ringfenced Covid-19 grant funding be put into an earmarked reserve to meet the ongoing financial impacts of the pandemic;
- c) That the remaining balance of £8.355m be set aside to partially replace the drawdown of £9.906m of earmarked reserves in respect of reducing the ongoing Minimum Revenue Provision (MRP) charge to the revenue budget in future years that was approved in the Quarter 3 Performance and Monitoring Report;
- d) The net roll-forwards of budget within the Capital Programme totalling £29.471m; resulting in a revised Capital Programme net budget of £117.624m for 2021/22;
- e) The net roll-forwards of budget within the HRA Capital Programme totalling £4.419m; resulting in a revised HRA Capital Programme net budget of £44.094m for 2021/22;
- f) The re-programming of the New Build & Acquisitions- Phase 4 budget of £1.400m within the HRA Capital Programme from 2023/24 to 2021/22 as set out in the report.

24. CEMETERY ARCH, LONDON ROAD

The Executive Director of Economic Growth and Neighbourhood Services submitted a report seeking approval for the proposal to dispose of Cemetery Arch on a 250-year. A Site Plan was attached to the report. Additional confidential information was included in the report and appendices considered in private session (see Minute 26 below).

The report noted that the Arch had been leased to Thames Valley Police in 1998 until it had been returned with vacant possession in December 2015. In September 2015, the Property had been marketed by informal tender on the open market and in accordance with the Third Sector Lettings Policy but no offers had been received. In June 2018, the Property was to have been sold at auction, but had been withdrawn when a local arts organisation Junction Arch Heritage & Arts (JAHA) had indicated that it wanted to convert the building into an arts venue. Discussions between JAHA and the Council had not concluded, and in November 2020, the Council had remarketed the Property seeking community interest through the Third Sector Policy with Reading Voluntary Action (RVA) and commercially through an agent.

The report explained that three bids had been received comprising one Third Sector bid from JAHA, and two private bids. The report summarised the bids and their proposed uses of the property. It noted that, although the bid from JAHA was not the top offer

POLICY COMMITTEE MEETING MINUTES - 12 JULY 2021

financially, it would provide local economic, community and social wellbeing opportunities with a proposal for a Heritage and Arts and community co-working Hub.

The JAHA development was proposed in two phases with office and community uses and was subject to funding. Phase 1 was to focus on the conservation of the Archway building with the rooms in the arch restored and utilised as affordable office space or dedicated office space for social enterprises together with the creation of a food court area to be run by Blue Collar. This would be funded by a Heritage Impact Loan from the Architectural Heritage Fund (AHF) sustained by income from the food court and office lettings. Phase 2 would create an exhibition space of Heritage and Art along with a single storey building and gardens to the south of the site for local businesses and community groups.

The report proposed that the Council and JAHA enter into an Agreement for Lease with a 250-year Lease of the Property together with any necessary rights of way as required under the archway, then being granted subject to JAHA securing planning permission and a Heritage Impact Loan of £165k from the Architectural Heritage Fund to deliver the Phase 1 works. The grant would also be subject to the Councils S123 disposal of open space process. The Agreement for Lease would be for a maximum of 18 months and if obligations were not met within that timeframe then the Agreement would end. Authority was sought for Officers to proceed with remarketing the property if required.

Resolved -

- (1) That, taking into account the information provided in the closed session (Minute 26 below refers), a long leasehold interest in the Property be granted to JAHA (Junction Arch Heritage & Arts) subject to planning permission and securing the necessary funding;**
- (2) That the Executive Director of Economic Growth & Neighbourhood Services, in consultation with the Assistant Director of Legal and Democratic Services, be authorised to deal with any objections to the Open Space disposal;**
- (3) That, in the event that the bid proposal or offer price was subsequently reduced or the purchaser did not perform to an acceptable timescale the Executive Director of Economic Growth & Neighbourhood Services, in consultation with the Leader of the Council, the Lead Councillor for Corporate and Consumer Services and the Assistant Director for Legal and Democratic Services, be authorised to:**
 - a) agree a revised bid proposal or offer price;**
 - b) re-engage with other bidders as appropriate or remarket the property for disposal at best consideration.**

25. EXCLUSION OF THE PRESS AND PUBLIC

POLICY COMMITTEE MEETING MINUTES - 12 JULY 2021

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 26-27 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.

26. CEMETERY ARCH, LONDON ROAD

The Executive Director of Economic Growth and Neighbourhood Services submitted a report providing additional confidential information on the proposal to dispose of Cemetery Arch on a 250-year Lease, which was considered under Item 24 above. The following documents were attached to the report:

- Appendix A - Site Plan
- Appendix B - Bid Application Summary Table
- Appendix C - JAHA Third Sector Bid
- Appendix D - Financial Implication Summary
- Appendix E - Valuer's Report

Resolved -

That the confidential information be noted and taken into account in considering the proposal to dispose of Cemetery Arch.

(Exempt information as defined in Paragraph 3.)

27. BRIGHTER FUTURES FOR CHILDREN - RESERVED MATTERS

The Deputy Chief Executive submitted a report, to the Committee in its capacity as the sole member of Brighter Futures for Children Ltd, setting out proposals regarding the senior pay scales applicable for BFfC.

The report explained that, following a Senior Pay Review, BFfC were proposing to revise their Senior Management Pay from 5 grades to 7 and that all Senior Management roles be subject to the Hay Job Evaluation methodology. The proposals were contained within the BFfC Report which was attached at Appendix 1.

Resolved -

That the proposed revised senior pay scale implementation as set out in Appendix 1 be agreed.

(Exempt information as defined in Paragraph 4.)

(The meeting started at 6.30 pm and closed at 8.20 pm)

This page is intentionally left blank

REPORT BY ASSISTANT DIRECTOR OF LEGAL AND DEMOCRATIC SERVICES

TO:	POLICY COMMITTEE		
DATE:	23 SEPTEMBER 2021		
TITLE:	DECISION BOOKS		
LEAD COUNCILLOR:	COUNCILLOR BROCK	PORTFOLIO:	LEADER OF THE COUNCIL
SERVICE:	LEGAL & DEMOCRATIC SERVICES	WARDS:	BOROUGHWIDE
LEAD OFFICER:	MICHAEL GRAHAM	TEL:	0118 937 3470
JOB TITLE:	ASSISTANT DIRECTOR, LEGAL AND DEMOCRATIC SERVICES	E-MAIL:	michael.graham@reading.gov.uk

1. PURPOSE OF THE REPORT AND EXECUTIVE SUMMARY

- 1.1 The Decision Book process was amended on 25 March 2020 to disapply the previous councillors' call-in arrangements within the 10-day period after its publication and replace it with the ability to seek a review of the decision retrospectively, and to keep the changes in force temporarily during the ongoing Covid-19 situation.
- 1.2 To complement the amended process the list of Decision Books published will be reported to Policy Committee as a standing item on the agenda.
- 1.3 The following Decision Book reports have been published since the previous report to Policy Committee:

Title	Date
639 - Temporary Accommodation Policy for Homeless Households	18/08/2021
638 - Provision of on-street and off-street Parking for the Royal Berkshire Hospital NHS Trust	30/07/2021
637 - Covid Local Support Grant - Phase 5 Proposal	29/07/2021
636 - Admission Agreement to Participate in the Local Government Pension Scheme in Relation to Provision of Cleaning Services at Manor Primary School: Aspire Cleaning	20/07/2021
635 - Appointment of School Governors	06/07/2021

- 1.4 A retrospective review of Decision Book Issue 638 was requested on 9 August 2021. The original Decision Book report is attached at Appendix 1 with further supporting information on the decision attached at Appendix 2.

2. RECOMMENDED ACTION

2.1 That the Decision Book Reports be noted;

2.2 That the Committee review the Decision of the Executive Director of Economic Growth & Neighbourhood Services regarding the Provision of on-street and off-street Parking for the Royal Berkshire Hospital NHS Trust.

READING BOROUGH COUNCIL

REPORT BY EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES

LEAD COUNCILLOR	COUNCILLOR TONY PAGE - LEAD COUNCILLOR FOR STRATEGIC ENVIRONMENT, PLANNING & TRANSPORT		
DATE:	30 JULY 2021		
TITLE:	PROVISION OF ON-STREET AND OFF-STREET PARKING FOR THE ROYAL BERKSHIRE HOSPITAL NHS TRUST		
SERVICE:	PLANNING, TRANSPORT & REGULATORY SERVICES	WARDS:	ABBEY & REDLANDS
LEAD OFFICER:	JAMES CROSBIE	TEL:	0118 937 2424
JOB TITLE:	ASSISTANT DIRECTOR OF PLANNING, TRANSPORT & REGULATORY SERVICES	E-MAIL:	James.Crosbie@reading.gov.uk

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 This report sets out the decision of the Council to support the Royal Berkshire Hospital (RBH) NHS Foundation Trust with its parking provision for patients and front-line staff. The decision is to enter into an agreement to provide up to 600 spaces at Queens Road Car Park and a further 178 on-street spaces at a commercially agreed day rate per space.
- 1.2 The report sets the projected income associated with the proposed agreement.

2. RECOMMENDED ACTION

- 2.1 It is the decision of the Executive Director for Economic Growth & Neighbourhood Services, in consultation with the Lead Councillor for Strategic Environment, Planning and Transport, to enter into agreement with the Royal Berkshire NHS Foundation Trust to provide on and off street parking at an agreed day rate per space.

3. POLICY CONTEXT

- 3.1 The Council is progressing an updated Reading Transport Strategy 2036, consultation of which ended in August 2020. The new strategy has been developed to help achieve wider objectives including the Reading 2050 Vision, the Climate Emergency which was declared in February 2019 and improved air quality. It is heavily focused on addressing these wider challenges through a package of solutions to both provide realistic sustainable alternatives to the private car, alongside measures to manage demand to improve air quality and congestion.
- 3.3 The Council is in the process of implementing a Customer Experience Strategy. This strategy sets out the Council's vision to achieve the best possible experience for its customers. This will have implications on public parking provision as well as value to

the council, customer service is a key requirement in the successful delivery of its parking services.

4. THE PROPOSAL

4.1 Current Position:

4.1.1 Currently 587 RBH/NHS staff are registered to park at Queens Road car park free of charge, as a result of the Government free parking initiative which ended on the 21 June 2021. This is a significant increase in use by the RBH from the previous season ticket arrangement pre-pandemic. Prior to the COVID pandemic, RBH had recognised the shortfall in parking availability and the need to provide suitable and convenient parking space for their patients and visitors whilst at the same time providing adequate parking for front line staff 24 hours a day.

4.2 Option Proposed

4.2.1 It is proposed to extend the use of Queens Road car park and additionally provide a solution for on-street Pay & Display (P&D) provision in the area of the RBH. Since the introduction of the on-street P&D scheme around the RBH there are some areas of capacity which have been identified and can be offered to the hospital. With this additional parking provision offered by the Council, RBH would be better able to meet the parking needs of patients, visitors and staff.

4.2.2 It is proposed to provide up to 600 daily spaces to the RBH at Queens Road park at a commercially agreed rate to be set out in Heads of Terms with the Trust. A further 178 on street spaces within the P&D provision has also been identified and will fees will be applied on a pay as you use basis rather than a fixed season ticket.

4.2.3 It is proposed that the agreement be set out for three years with an option to extend for a further 2 years. The hours of use for the allocation will be 24 hours, given the nature of use of the hospital.

4.2.3 On-street parking is offered at:

- **Upper Redlands Road** - 91 Spaces (Walking time Upper Redlands Road/Alexander Road junction to Maternity Block, 10 minutes)
- **Allcroft Road** - 22 Spaces (Walking time Allcroft Road/Whitby Road junction to Maternity Block, 9 minutes)
- **Kendrick Road** - 65 Spaces (Walking time Kendrick Road/Morgan Road junction to Maternity Block, 10 minutes)

4.2.4 The introduction of the On-Street element will require a modification to the current Permit Smarti application at a cost of approximately £3k with an estimated lead time of 3 months.

4.2.5 The on-street P&D use and space available reduces capacity problems generated at the hospital car parks.

4.2.6 It is proposed to commence this agreement with the RBH from 1st August 2021.

5. CONTRIBUTION TO STRATEGIC AIMS

5.1 The parking strategy, procurement of civil enforcement services and changes to resident permit parking sits within the wider context of the Reading Local Transport Strategy 2036. Parking management and civil enforcement activities supports several strategic aims within the Reading Transport Strategy and Reading's Corporate Plan:

- **Healthy Environment:** Parking management has a positive impact on the public realm creating a safe and accessible environment for residents, workers and visitors. Parking management is part of the wider management of the road

network which contributes to safety, protecting vulnerable users and encouraging walking and cycling. The parking strategy encourages greener and cleaner vehicles using environment related tariffs. Specific restrictions with fair and consistent enforcement promote sustainable travel through efficient public transport

- Thriving communities: Good parking management ensures homes, business and leisure are accessible. Parking schemes such as resident permit parking and specific restrictions such as disabled parking contribute positively to the community.
- Inclusive Economy: Parking management of the town centre and local centres support the local economy. The structure of tariffs particularly in the town centre strikes a balance between supporting the local day-time economy whilst encouraging model shift for longer visits encouraging model shift and sustainable mobility.

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

- 6.1 The Parking Strategy takes full account of the Council's climate change policy commitments as set out in the Reading Climate Emergency Strategy 2020-25, the Council's Carbon Plan 2020-25 and the Draft Reading Local Transport Strategy 2036. The Parking Strategy aims to move towards environmental impact-based tariffs for all aspects of paid for parking within the scope of the Councils parking service. Civil enforcement contributes to an efficient public transport provision which in turn encourages model shift.

7. EQUALITY IMPACT ASSESSMENT

- 7.1 It is not considered that the recommendations within this report will have a differential impact on: racial groups; gender; people with disabilities; people of a particular sexual orientation; people due to their age; people due to their religious belief and therefore no Equality Impact Assessment (EqIA) is relevant to the decision.

8. LEGAL IMPLICATIONS

- 8.1 An agreement will be drafted in consultation with Legal Services.

9. FINANCIAL IMPLICATIONS

- 9.1 Over the last financial year, Covid has resulted in a 75% drop in revenue generated from car parking income, including a 70% hit on Queens Road Car Park, the biggest RBC car park by income. This initiative offers the opportunity to secure guaranteed income for the Council from the proposed arrangement with Royal Berkshire Hospital at a time of commercial uncertainty while at the same time offering up On Street parking spaces at under-utilised locations over the 3 - 5 years. Added benefit of assisting the hospital with its parking capacity issues at a time of ever-increasing demand.
- 9.2 Related costs are not material and include the completion of internal car park Automatic Number Plate Recognition system coding in addition to the required modifications to the on-street parking system (Permit Smarti). These will be funded from within existing Transport revenue budgets.

10. BACKGROUND PAPERS

- 10.1 None.

This page is intentionally left blank

Appendix 2

Decision Book 638 - Provision of on and off-street parking for the Royal Berkshire NHS Trust.

- 1.1 Following the publication of the decision book, an enquiry was received from Councillor Rob White in respect of a number of issues he had identified, namely:
- Why the decision had been taken to use the Decision Book process.
 - On the basis that the off-street provision required more immediate action from the Council, why this was not separated from the on-street proposal.
 - Why residents had not been consulted on the use of the pay and display bays for use by the hospital as part of the agreement.
 - Whether the exclusion of financial data was necessary to protect commercial confidentiality.
 - Whether the report should have been more explicit in relation to the operational use of the pay and display bays.
- 1.2 In response to Councillor White's enquiries, the Assistant Car Parks Manager responded, setting out responses to the operational queries that had been raised.
- 1.3 The Interim Assistant Director for Planning, Transport & Regulatory Services then followed up with a further briefing to Councillor White. This note sets out a summary of the responses to the questions raised.
- 1.4 Why was the Decision Book process used?**

Consideration was given to the extent of the existing arrangements with the RBH to provide off street car parking at Queens Road car park. An arrangement existed pre-pandemic, but had been subject to discussion as it didn't fit the needs of the RBH. During the pandemic, use by the RBH had grown, but this was linked to the Government's guidance to provide free parking for the NHS. This free arrangement ended in July 2021 and therefore discussions had been restarted to find a solution which would meet the RBH's needs and that of the Council which took the approach that securing a stable income over the next few years would be beneficial given the change in the parking market arising from Covid. The end of the free arrangement and the lead in time to secure an agreement and the practical arrangements which needed to be delivered meant that there was an urgency to the decision, which could have been impacted by other providers undercutting the offer. The use of the decision book process was agreed upon with advice from Committee Services, Legal Services and with agreement with the Executive Director and the Lead Member.

- 1.5 On the basis that the off-street provision required more immediate action from the Council, why this was not separated from the on-street proposal.**

The discussions with RBH included linking the agreement to securing some on street provision around the hospital. A utilisation study had shown that there was an under usage of the designated pay and display bays in some areas and these were identified as meeting the needs of the RBH. It was therefore decided that a single linked agreement could be entered into and it was therefore appropriate to have a single decision book setting out this arrangement.

- 1.6 Why residents had not been consulted on the use of the pay and display bays for use by the hospital as part of the agreement.**

Officers advised that the pay and display bays had already been through public consultation when they were introduced. Their use was not changing, but it is recognised that their usage is being promoted and therefore it would have been appropriate to inform residents. Following comments received by a resident and subsequently Councillor White, a letter setting out clearly the proposal has been issued to those streets where usage by the RBH is being promoted.

1.7 Whether the exclusion of financial data was necessary to protect commercial confidentiality.

Options for how the financial data could be presented was considered, but based on knowledge of other commercial operators tariffs and the competition faced by all major car park providers it was determined that providing headline information could be manipulated to identify the tariffs. Officers accept that other options could have been explored, but the extent to which this would impact on the decision is questionable.

1.8 Whether the report should have been more explicit in relation to the operational use of the pay and display bays.

Officers accept that more detail could have been provided to clarify the way in which the pay and display bays were to be used by the RBH could have been provided. This will be taken into account in the future.

1.9 That the Decision of the Executive Director of Economic Growth & Neighbourhood Services regarding the Provision of on-street and off-street Parking for the Royal Berkshire Hospital NHS Trust and the action taken by officers to address the issues raised in Councillor White's request for a review of the decision be noted.

READING BOROUGH COUNCIL

REPORT OF DEPUTY CHIEF EXECUTIVE

TO:	POLICY COMMITTEE		
DATE:	23 SEPTEMBER 2021		
TITLE:	CEMETERY AND CREMATORIUM RULES AND REGULATIONS		
LEAD COUNCILLOR:	CLLR RUTH MCEWAN	PORTFOLIO:	CORPORATE AND CONSUMER SERVICES
SERVICE:	REGISTRATION & BEREAVEMENT SERVICES	WARDS:	BOROUGHWIDE
LEAD OFFICER:	ISABEL EDGAR	TEL:	
JOB TITLE:	ASSISTANT DIRECTOR OF CORPORATE IMPROVEMENT AND CUSTOMER SERVICES	E-MAIL:	Isabel.edgar@reading.gov.uk

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 To present the results of the Bereavement Services Public Consultation which took place following the Policy Committee in June 2021 and, to obtain approval of the recommended actions.
- 1.2 Appendix 1 - Cemetery and Crematorium Rules and Regulations Sept 2021
Appendix 2 - Consultation Summary Report
Appendix 3 - Equality Impact Assessment Report

2. RECOMMENDED ACTION

- 2.1 To approve the revised Cemetery & Crematorium Rules & Regulations as set out in Appendix 1.
- 2.2 To approve the changes to the Service provision as summarised in Section 4.2.4.
- 2.3 To approve the proposal to review the Cemetery & Crematorium Rules and Regulations every 3 years, to ensure they remain fit for purpose. The next review to be September 2024.
- 2.4 To approve the Council's position, in respect of one-off requests which sit outside of the Rules and Regulations, namely that no further ad hoc changes are permitted. If any request is received that sits outside the Rules and Regulations, it must be either declined or submitted formally as a Policy change and proceed through the formal decision-making processes.
- 2.5 To delegate authority to the Assistant Director for Corporate Improvement and Customer Services to make non-material changes to the Rules & Regulations, to ensure the Service can act swiftly to implement any essential operating changes.

3. POLICY CONTEXT

- 3.1 Local Authorities are required to publish Regulations that set out their service offer for burials within Council owned cemeteries. The Council operates 3 cemeteries and has adopted a further 5 closed churchyards.
- 3.2 The Cemetery and Crematorium Rules & Regulations (Rules and Regulations), attached at Appendix 1, will apply to the 3 cemeteries under the Council's full control - Henley Road Cemetery, Reading Cemetery and Caversham Cemetery. They also apply to the Reading Crematorium and Gardens of Remembrance based in Henley Road Cemetery.
- 3.3 In September 2010 the Council adopted the Charter for the Bereaved which sets out a best practice model for cemetery operations and an inclusive service provision for all faiths, where possible. In summary, the Charter:
- seeks to generate interest in and educate people about bereavement. It also helps to influence the expansion of services and clarify the various roles and responsibilities of those involved.
 - is a commitment to improving the service by confronting rather than disguising or ignoring death.
 - is intended to define the rights of every individual who experiences bereavement. In achieving this aim, it also sets standards of service related to burial, cremation, and funerals. It is a written statement of what can be expected and enables people to judge the quality of the service received.
 - seeks to increase the range of choice and options available to the bereaved.
 - seeks to enable the bereaved to arrange a meaningful funeral service with a content that meets with their own specific needs and requirements.
- 3.4 In October 2020 the Council committed to reviewing its existing operating practices and Rules and Regulations following representations made by some of the Borough's Muslim community that the service currently offered did not fully meet their faith needs. Following completion of an equalities impact assessment and meetings with both Mosque leaders and representatives of the community, new Rules and Regulations were drafted and presented to Policy Committee in June 2021.

4. THE PROPOSAL

4.1 Current Position:

4.1.2 Operating Practices:

There have been numerous additions and changes to operating practices across Henley Road Cemetery (the Cemetery) over the past 40 years. Both in response to customer need/request, as well as changes to regulations. This has resulted in many areas of the Cemetery that were intended to be Lawn Graves, having been mounded or marked out with fences over time. It has also resulted in memorials and adornments being placed on graves which are not permitted under the current Rules and Regulations.

- 4.1.3 Over the years, ad-hoc decisions/agreements have been made in response to customer requests that have contravened the Rules and Regulations. These decisions have created an inconsistency in approach and set new precedents that have been challenging to manage. Within a cemetery environment, these

decisions have long term implications. For example, a decision made regarding a memorial stone or grave type will have an impact in perpetuity or at least for the 75 years a grave lease can be granted for. These ad hoc decisions have been made in good faith, to assist individual customers, but contrary to the effective long-term management of the Cemetery. Over time this inconsistency in approach has negatively impacted on the safe, efficient and cost-effective operation of the Service and resulted in upset and distress to many other customers who have been denied their request. The consultation feedback indicates strong support for the enforcement of the Rules and Regulations to ensure consistency and fairness for all customers.

4.1.4 The proactive enforcement of the Rules & Regulations has not been routinely applied for several years. Enforcing our policies is a sensitive issue for families especially those that wish to adorn or mark out graves with items that contravene the Rules & Regulations. Prior to taking any action (e.g the removal of adornments) the Bereavement Service contact the grave owner to notify them of the contraventions. On occasion, and as a last resort the grounds maintenance teams have needed to act, for example where grave adornments encroach on neighbouring graves, are dangerous or where plants are overgrown etc. The revised Rules & Regulations allow for stricter enforcement by the service management.

4.1.5 The projected burial provision in Reading is for a further 5 years in the Westfield area of the Cemetery, together with 3 years in the area known as Mayfield. Given this limited land supply, the strict enforcement of the Rules & Regulations is essential, if the projected lifespan is to be protected.

4.2 Options Proposed

4.2.1 The proposed operations and service provision are set out in the Rules and Regulations attached at Appendix 1. They have been updated in light of the consultation feedback and to ensure the Council can provide a service that meets the needs of the communities of Reading, where it is reasonable and practical to do so. The changes address both faith and non-faith needs. All changes must ensure the operation remains efficient and cost effective. The proposed changes to current operational practices are shown in section 4.2.4 below.

4.2.2 The proposed changes are within the context of a national burial land shortage and will provide a predicted burial provision as stated in 4.1.5

4.2.3 Several non-material changes have been made to the Regulations document, these include layout, showing both metric and imperial measurements and updates to legislation.

4.2.4 Additionally, following the consultation, a number of changes have been made to the Rules and Regulations, these are detailed where appropriate below, together with the rationale for the changes.

Service Proposal	Double Depth Graves Graves dug to a depth of 6ft 6' (1.98m) to accommodate 2 standard depth coffins no more than 18' (457mm) each.
Conclusion	No Change to Initial Proposal - proceed as stated. There were no objections within the Consultation indicating this was not an acceptable policy

Proposal	Double Grave Sets. Double size Traditional Grave kerb sets are not permitted in any area of the cemetery.
Conclusion	No Change to Initial Proposal - proceed as stated.

Proposal	Adjacent Plot Graves Plots which are side by side. - Adjacent plots are not available for purchase. Reserving of any plots across the site will not be allowed.
Conclusion	No Change to Initial Proposal - proceed as stated.

Proposal	Extended Opening Times Normal opening hours extended to cover 6 days a week: Monday - Saturday. Late night opening on Thursdays in the summer months
Conclusion	Change to Initial Proposal - Proceed on revised basis: <ul style="list-style-type: none"> • Provide 6 days (Monday to Saturday) for all customers. • Provide an out of hours/on call service for ALL bank holidays excluding: <ul style="list-style-type: none"> ○ Christmas Day and Boxing Day ○ New Year's Day ○ Good Friday • No services will be provided on Sundays. <p>Feedback from the consultation and through the community meetings indicated that removing the out of hours service may impinge on the requirements of the Muslim faith to bury loved ones as soon as possible. This would be particularly challenging around extended bank holiday periods. Having taken the feedback into consideration, the service will now provide an out of hours/ on-call facility for Muslim burials to cover bank holidays on the basis above.</p>

Proposal	Out of Hours Service: Cease 'out of hours' services for weekends										
Conclusion	Minor Change to Initial Proposal - Proceed on revised basis: <p>Due to the proposed extended opening hours (see above for further details) and the lack of demand for out of hours burials* the out of hours service will be limited to bank holidays only as shown in the section above. The table below demonstrates very little demand for out of hours/on call services (see below)</p> <p>*Weekend/Bank Holiday Call outs:</p> <table border="1"> <tr> <td>21/22</td> <td>20/21</td> <td>19/20</td> <td>18/19</td> <td>18/17</td> </tr> <tr> <td>0</td> <td>3</td> <td>2</td> <td>3</td> <td>2</td> </tr> </table>	21/22	20/21	19/20	18/19	18/17	0	3	2	3	2
21/22	20/21	19/20	18/19	18/17							
0	3	2	3	2							

Proposal	Grave Types <ul style="list-style-type: none"> • Lawn Graves will be available in Mayfield and Westfield and for 2nd interments in Park. • Traditional Graves will be available in the multi-faith area of Mayfield only. • Mounded graves will be available in the Muslim section of Westfield only. Mounded graves will be permitted to have a memorial stone
-----------------	--

	<p>or plaque if required. This policy can be retrospectively offered to any family with a loved one previously buried in a lawn grave in the Westfield area only. The change of grave type is subject to a fee.</p> <ul style="list-style-type: none"> • Traditional graves will not be permitted in Westfield. • Vault graves are subject to availability. Every effort will be made to ensure vault graves are readily available. However, they will not be available if it is deemed unsafe to build or the integrity of the grave would be compromised due to the weather or other unforeseen circumstance.
<p>Conclusion</p>	<p>Change to Initial Proposal: Proceed on revised basis</p> <p>Traditional graves to be permitted in the Muslim section of Westfield.</p> <p>Please note impacts to cemetery layout and operations.</p> <p>58% of the Muslim community who responded stated the grave types available were either acceptable or did not apply to them.</p> <p>36% of respondents stated the grave types were not acceptable, however on further scrutiny of the data, these respondents had stated that both mounded or traditional were acceptable. Only 5 individual respondents specifically stated traditional graves were the only grave type that was acceptable to them.</p> <p>The Muslim faith requires the grave to be mounded to prevent anyone/anything from walking /driving over the deceased. The mounded grave meets this requirement. However, there was still a small demand from families to have the traditional grave option. Although during the consultation sessions with the Muslim community many indicated that a traditional grave was cost prohibitive.</p> <p>The shape of the Westfield area of the cemetery means we are restricted on how we layout graves to allow maximum capacity. It is usual to place like with like graves together (e.g traditional graves together, lawn graves together, mounded graves together) this allows for the efficient maintenance of the site. This practice also ensures the aesthetic of the cemetery is tidy, uniform and peaceful and has a positive impact on the overall experience of visitors to the cemetery. This should not be underestimated as part of the overall service offer.</p> <p>The service offer to the Muslim community also provides an option for a family to have a vaulted grave. Although vaulted graves are not in high demand, these graves must be pre dug and built. To provide vaulted graves in each area of the Muslim sections (mounded, lawn and traditional) would further impact on space and design of the cemetery, and it is not practical or a cost-efficient management of the site.</p> <p>Therefore, it is recommended that Traditional and Mounded graves are located together in the Muslim section of Westfield, as they have similar maintenance requirements. This will ensure the needs of the Muslim faith are met, the cemetery is managed effectively, and the preparation of vault graves can be managed more effectively in the</p>

	<p>Traditional/Mounded section. This will impact slightly on the aesthetic and uniformity of this area of the cemetery.</p> <p>Those with loved ones already buried in Westfield will be offered the opportunity to change grave type to traditional or mounded.</p>
Proposal	<p>Quran Graves Quran Graves will still be provided, but accessible by appointment only. A member of the cemetery team will discreetly escort the family to the grave to open and lock the grave</p>
Conclusion	<p>No Change to initial proposal - Proceed as stated</p> <p>There were no objections within the consultation feedback that indicated this was not an acceptable policy</p>
Proposal	<p>Access All new burial areas will allow a 900mm grassed walkway between rows to allow access for a wheelchair/pushchair. Concrete pathways will not be installed</p>
Conclusion	<p>No Change to Initial Proposal - Proceed as stated.</p> <p>There were no objections within the consultation feedback that indicated this was not an acceptable policy.</p>
Proposal	<p>Proactive enforcement of the Rules & Regulations The revised Rules and Regulations provides the bereavement services management additional enforcement authority without the need for further referral to the grave/memorial owners.</p>
Conclusion	<p>No Change to Initial Proposal - Proceed as stated</p> <p>84% of the respondents in the public consultation stated the proposed Rules & Regulations were easy to understand</p> <p>78% stated they were balanced and fair.</p> <p>Customer comments within the consultation feedback requested enforcement of the Rules and Regulations should be stricter and consistently applied, thereby supporting the policy.</p>

4.2.5 The revised Rules & Regulations allow for stricter enforcement by the cemetery management. Through the public consultation feedback, customers commented that the inconsistent or lack of enforcement was unfair, caused issues for other users and was potentially discriminative. The approval of the revised Rules and Regulations, in their entirety, will enable the cemetery management to address some of the historic issues and attempt to mitigate some of the impact.

4.2.6 The approval of the Rules and Regulations will also ensure the cemeteries can be managed safely, effectively and efficiently. However, it is accepted that over time some changes may need to be made and therefore the Rules & Regulations will be subject to a formal review every 3 years.

4.2.7 On this basis, it is recommended that no further ad hoc changes are permitted. If any request is received that sits outside the Rules and Regulations, it must be either declined or submitted formally as a Policy change and proceed through the formal decision-making processes.

4.2.8 On occasion, it is possible a non-material change may need to be made to the Rules and Regulations to ensure the Service can act swiftly to implement any essential operating/legislative changes. It is therefore recommended that authority is delegated to the Assistant Director responsible for the service to make these changes. All changes will be included at the front of the Rules & Regulations document to provide an audit trail of non-material decision making. These changes will be applied universally. Examples of non-material changes could include temporary changes due to health and safety requirements or prevention of use of drones for example.

4.3 Other Options Considered

4.3.1 Other options were considered and discarded as presented to Policy Committee in June 2021 - The document can be found using this link:

<https://democracy.reading.gov.uk/ieListDocuments.aspx?CId=138&Mid=4571&Ver=4>

4.3.2 The output from the Consultation indicates broad support for the proposed new Rules and Regulations.

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:

- Healthy Environment
- Thriving Communities
- Inclusive Economy

5.2 The proposals within this report support the Council's priority of Thriving Communities:

- Committed to tackling inequality in our society, to ensure everyone has an equal chance to thrive whatever their economic, social, cultural, ethnic, or religious background.
- Prioritising the needs of the most marginalised groups and the most vulnerable adults and children in our communities.
- To promote equality and social inclusion for all.

5.3 Throughout the pandemic and more than ever before, our communities have felt the impact of losing loved ones. The Council has been able to respond to their needs through this period and prior. However, the current Rules and Regulations do not fully reflect our commitment to promoting an equal and inclusive community. The revised Rules & Regulations (September 2021) set out an inclusive service offer for bereaved families in Reading; balancing faith, non-faith, and accessibility needs, with the ongoing management of a cemetery for at least 75 years.

5.4 The output from the consultation is extremely valuable and has not only aided the decision making on the four key issues on which the consultation focused, but it has also provided a level of detail which allows the Bereavement Services Management to make more informed decisions on how to improve all aspects of the Service. One such improvement will be to consider ways in which the Rules and Regulations can be made easier to understand and be more accessible to all. Feedback showed that some people found the Regulations difficult to understand and some found the length of the document challenging.

5.5 The introduction of the new grave types for our Muslim community, the extended hours to assist all communities and the new Rules & Regulations, all provide the foundation on which to build closer relationships with our communities.

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

6.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers). There are no climate change or environmental impacts relating to the changes made to the Rules & Regulations:

- The changes predominantly relate to the service provision and the manner in which it is delivered.
- There are no changes to the burial procedures which would impact on the environment.

7. COMMUNITY ENGAGEMENT AND INFORMATION

7.1 In March 2021 a Reading Mosque leaders meeting was convened to begin discussions in relation to Muslim Burials. Following this a Muslim community meeting was held with around 70 Reading residents attending.

7.2 A commitment was made to review the Service and a full public consultation on the draft Cemetery Rules and Regulations commenced on 28 June 2021 for a period of 45 days, ending 12 August 2021. The launch of the consultation was publicised as follows:

- Press release
- RBC Policy and Voluntary Sector Manager issued a formal launch email to all the relevant contacts and their network. The emails went to
 - Traveller community contacts
 - Older people and Physical Disability and Sensory Needs Network (PDSN) community groups
 - Religious, faith and diverse ethnic and cultural communities
 - Accessibility and Disability Working Group
- Reminder requests were issued to the above within 14 days of the consultation close date.
- Posters were displayed throughout Henley Road cemetery and at the gates to Caversham Cemetery and Reading Old Cemetery.
- Posters were displayed in local library windows.
- A reminder / prompt message was issued using RBC Twitter & Facebook accounts 4 days prior to the consultation closing date.

In addition, two presentations were delivered to the Muslim Community. One on 22 July 2021 to mosques leaders and representatives from the Pakistani Community Committee and one on 28 July 2021 to members of the Muslim community previously invited to the original meetings in March 2021. A presentation opportunity was offered to the Chair of ACRE for other BAME communities, but this was not taken up.

8. EQUALITY IMPACT ASSESSMENT

- 8.1 Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, 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 An equality impact assessment (EIA) was undertaken and submitted in June 2021. The Regulations set out in Appendix 1 reflect the findings of the assessment. The EIA specifically considers:
- Faith Burials (Muslim, Christian, Hindu, and Sikh)
 - Traveller and Gypsy Burials
 - BAME
 - Access to the cemetery
- 8.3 The EIA identified the revised service provision and operational practices at the cemetery will meet the needs of our Muslim and Disabled communities. In summary this includes:
- Extended standard hours to include a Saturday and select Bank Holidays, as defined in the Rules & Regulations, reduces the need for staff to be on call.
 - The introduction of the mounded and traditional grave with the Muslim sections of the cemetery now provides a grave type which meets the needs of the Muslim faith. Allowing Traditional graves will also meet most personal preferences.
 - Accessibility on site, specifically for wheelchair users, will be improved in all areas where existing graves do not obstruct the area. As a result of the consultation, some additional improvements have potentially been identified. These will be investigated and addressed separately.
- 8.4 Since the public consultation, the EIA submitted in June 2021 has been revisited and updated accordingly.

9. LEGAL IMPLICATIONS

- 9.1 Under the Local Authorities' Cemeteries Order 1977 (LACO) Legislation the Council must set out its Cemetery Regulations and publish them.

10. FINANCIAL IMPLICATIONS

- 10.1 The changes to the service will require a restructure of the Bereavement Services Team and additional resource. However, the changes allow the service to address many of the issues raised in the public consultation and provide an opportunity to better meet the needs of the diverse communities across Reading, including the Sikh & Hindu community with the introduction of Saturday cremation services.
- 10.2 The changes also provide several additional income generating opportunities. The additional opening hours will enable more services to be available, such as scattering of ashes on a Saturday and access to the team to discuss potential memorial options which can be purchased from the Council. The feedback from

the consultation has also provided additional income generating ideas which will also be explored.

10.3 A restructure business case is in the process of being drafted and this will include a financial analysis. Initial calculations show any additional costs can be offset against the ability to generate more income.

10.4 Implementation of some of the following proposals will have an impact on costs and income generation:

- Traditional Grave areas and Mounded grave areas of the cemetery will result in an increased cost of maintenance. Typically, a Mounded or Traditional grave costs around 3 times more to maintain than a Lawn grave area. This is because grass cutting for Lawn graves areas can be done with drive on grass cutters, whereas traditional or mounded graves require a hand pushed mower and strimmer. In addition to the mowing, mounded graves will require a 'shell' or covering to ensure the mound remains in place. It is anticipated a sedum mat would be used for this purpose. These mats cost approximately £35 each. Manual weeding & tending of the mats will be required.
- Currently the cost of burials is held artificially low. The cost does not currently reflect the cost for maintenance of a grave over the 75-year lease period. Depending on the type of full body burial it can cost between £1075 to £3225. This cost covers: the grave digging fee, the dressing of the grave (e.g, grass matting, shoring, shovels for families to fill if they wish), admin costs such as staff salaries, concrete plinths on which the memorial stone is placed, memorial testing every 5 years (this would occur 15 times for a 75-year lease), and general maintenance of the grounds over the 75 years.

The impacts proposed in this report therefore will increase the maintenance costs over the life of the cemetery. Although this cannot yet be fully costed. A review of the current ground's maintenance costs will be undertaken to identify opportunities to control costs.

11. BACKGROUND PAPERS

- ICCM Charter for the Bereaved:
<https://www.iccm-uk.com/iccm/charterforbereaved/>
- Guide for Burial Ground Managers (Department for Constitutional Affairs):
<https://www.gov.uk/government/publications/burial-grounds-guidance-for-managers>
- GardensofPeace.org:
<https://gardens-of-peace.org.uk/>
- Cemeteries and Burial Culture and Traditions for people from the Traveller communities:
<https://www.gypsy-traveller.org/resource/cemetery-culture-and-traditions-for-people-from-the-traveller-communities-with-regards-to-cemeteries-and-burying-the-dead/>

Cemeteries and Crematorium Regulations

For the management, regulation, and control of:

Henley Road Cemetery

Reading Crematorium and Gardens of Remembrance

Reading Cemetery (London Road)

Caversham Cemetery (Victoria Road)

September 2021

Contents

Section	Topic	Page
	Foreword	3
1	Contact Details and Opening Hours	4
2	Grave Types	5
3	Grave Measurements & Depths	7
4	Orientation of Graves	7
5	Grave Preparation & Backfilling	8
6	Defined Memorial Areas, Size & Other Specific Restrictions	8
7	Grave Allocation and Ownership	12
8	Transfer of Right of Grave Ownership (Exclusive Rights)	13
9	Coffins	13
10	Exhumation	13
11	Disposal of Cremated Remains	14
12	Erection & Repair of Memorials	14
13	Other Memorials (plaques, benches etc)	16
14	Flowers & Floral Tributes	16
15	General Regulations Relating to Other Item of Memorabilia & Christmas Wreaths (all areas of all cemeteries)	17
16	Vehicles	18
17	General Rules & Regulations	19
18	Fees & Charges	20
Appendix 1	Framework for Enforcement of Rules & Regulations	21
Appendix 2	Henley Road Cemetery Site Plan and Grave Types	23

Version Control

Date	Version	Detail	Revising officer
14/09/2021	V1	New Rules and Regulations drafted following public consultation and submitted to Policy committee on 23/09/2021	Isabel Edgar

FOREWORD

CEMETERIES REGULATIONS (including Gardens of Remembrance)

Reading Borough Council welcomes all visitors to our cemeteries in Reading and asks that visitors respect the peace, dignity and reverence of these facilities as well as other users. We thank you in advance for your consideration.

The regulations in the following pages have been drawn up by Reading Borough Council to ensure the Cemeteries and Gardens of Remembrance are managed and used in a sensitive and appropriate way for everybody. These are communal spaces for quiet reflection and remembering our loved ones.

Although these regulations are a requirement for the management of the Cemeteries and Gardens, every effort has been made to avoid restricting the rights and choices of the individual. Therefore, these regulations have been prepared with a balance between individual rights, an inclusive approach and the need to regulate for safe and tidy grounds.

The Council has adopted, where possible, the principles of the Charter for the Bereaved and is committed to giving individuals the rights as provided by the Charter. For further information, contact the Cemetery Office or see the “Information” section of the Institute for Cemetery and Crematorium Management (ICCM) website, <http://www.iccm-uk.com/iccm/>

Reading Borough Council, under the Local Authorities’ Cemeteries Order 1977 (LACO), is responsible for regulating three Cemeteries in the town. It is required by that Order, to set out regulations to provide a safe and dignified environment for all visitors and can do anything considered necessary for the proper management of these Cemeteries. The cemeteries for which the Council is responsible under these regulations are:

- Henley Road Cemetery, All Hallows Road, Caversham.
- Reading Cemetery, London Road, Reading.
- Caversham Cemetery, Victoria Road, Caversham.

The office for all three Cemeteries is located just inside the main entrance gates at Henley Road Cemetery. The Bereavement Services Management can be contacted at this location.

These Rules and Regulations will be formally reviewed every 3 years.

LEGISLATION

There are several Acts of Parliament and Government Regulations which apply to burials and cremations and to the way cemeteries are maintained. If there is any conflict between any legislation and the Cemetery Regulations, then the legislation shall apply.

The legislation that some of the rules are based upon includes the following:

- Cremation Acts 1902 and 1952
- Health and Safety at Work Act 1974
- The Local Authorities Cemeteries Order 1977 SI 1977/204 (as amended)
- Cremation (England & Wales) (Amendment) Regulations 2017
- Environmental Protection Act 1990

Burial Services: 1st September - 30th April.
At the Graveside Mon - Fri: First 9.45am - Last 3pm
 Saturday: First 11.15am - Last 2.15pm
 Sunday: Closed

1st May - 31st August.
 Mon, Tues, Wed & Fri: First 9.45am - Last 3pm
 Thursday: First 9.45am - Last 4.30pm
 Saturday: First 11.15am - Last 2.15pm
 Sunday: Closed

Please Note:

The Cemetery Office is closed every Sunday & Bank Holiday

No Burials can take place on a Sunday or Bank Holiday*

Burials at any other time are strictly at the discretion of the Bereavement Services Management and subject to available resources.

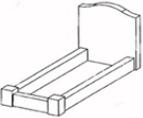
* An on-call service is provided for Muslim burials on Bank Holidays (excluding Sundays) except for Christmas Day, Boxing Day, New Year’s Day and Good Friday. Subject to time restrictions.

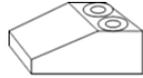
Gates to the cemeteries are locked at the closing times shown and there is no facility to unlock them outside of these hours. Vehicles must not be left on the premises after closing time, as access to retrieve them will not be available until the following morning. Vehicles parked at any time are done so at the owners’ risk.

SECTION 2 - GRAVE TYPES (including graves for cremated remains)

- 2.1 There are different types of grave available in different sections of the Henley Road Cemetery and these are shown in the table at paragraph 2.3 below. The location of these graves is marked on plans available at the Cemeteries office. The Exclusive Right of Burial is purchased through the Cemetery office. (See Section 7).
- 2.2 Memorial stones and kerb sets are not provided and should be purchased through a registered memorial stonemason (see Section 12). Plaques can be purchased through the Cemetery Office or memorial stonemason. All memorial stones, kerb sets, and plaques must be approved by Reading Borough Council prior to purchase.

2.3

<p>Traditional Grave</p> 	<p>This is a grave with a memorial stone and a kerb set that forms an edging around the grave area.</p> <p>The memorial stone could be a headstone or footstone. This will be determined by the location and position of the individual grave within the cemetery.</p>
--	--

	Monuments, gravestones, tablets, inscribed vases or kerb railings may all be erected, subject to approval by the Bereavement Services Management
<p>Lawn Grave</p> 	<p>This is a grave with a memorial stone, a small area for planting seasonal flowers immediately in front of the memorial stone and a grassed area level with the ground.</p> <p>The memorial stone will be either a headstone or footstone. This will be determined by the location and position of the individual grave.</p>
<p>Mounded Graves</p> <p><i>Picture to follow</i></p>	<p>This is a grave which has soil neatly piled on top of the grave at ground level and formed into a mound, no more than 300mm high. The mound will have a natural, slow growing sedum mat to protect and stabilise it. No further planting around or on the mound is permissible.</p> <p>The grave can have a memorial stone, which will be either a headstone or footstone*. This will be determined by the location and position of the individual grave.</p> <p style="text-align: center;">Or</p> <p>A plaque placed at the head or foot of the grave depending on the location and position of the grave.</p> <p><i>*All new areas of the cemetery are laid to allow headstones only</i></p>
<p>Quran Grave</p>	<p>This is a standard size grave lined with wooden shoring. The grave is securely covered, and a key is provided as and when families wish to place sacred scripts in the grave.</p> <p>These graves are available, but for Community purchase only. They are not available for individual purchase.</p>
<p>Walled or Vaulted Grave</p>	<p>This grave type is lined with bricks and slabs.</p> <p>These graves are only available on request and a minimum of 10 days' notice prior to the burial date is required. Please note that due to specific requirements for Muslim burials a small number of vault graves will be prebuilt.</p> <p>Due to the building work required, availability is also dependent on the weather being suitable, to ensure stability of the grave.</p>
<p>Cremated Remains Flat Tablet Grave</p> <p><i>Picture to follow</i></p>	<p>This type of grave is only for cremated remains.</p> <p>It has a flat memorial stone within the kerb (not a headstone/footstone) and a small area for planting seasonal flowers behind the stone.</p>
<p>Cremated Remains Wedge Tablet Grave</p> 	<p>This type of grave is only for cremated remains.</p> <p>It has a memorial in the shape of a wedge tablet, and it can contain up to two sunken flower vases.</p> <p>No other memorial items may be left on this type of grave.</p>

Unmarked Graves	In keeping with legislation, Reading Borough Council makes provision for public or “common” graves at Henley Road Cemetery. Cremated remains cannot be buried in public graves. They will be scattered in the Gardens of Remembrance, and the location recorded. No memorial may be placed on any public grave.
-----------------	--

SECTION 3 - GRAVE MEASUREMENTS & DEPTHS

3.1 Industry standards use both Metric & Imperial units depending on the use, therefore, to assist with understanding, both units of measurement have been included but please note:

Only measurements shown in **BOLD** are the official measurements and **MUST** be used for the purchase or use of a grave or memorial. Any other measurement is an approximate guide only.

3.2 Reading Borough Council cannot be held liable for any costs incurred or errors made when ordering memorial stones, kerb sets or plaques.

3.3 **Please note: The measurements below refer to the grave space and not the permitted memorial size.**

Grave Type	Measurement (Imperial)	Measurement (Metric)
Traditional, Lawn and mounded graves	8 feet long x 4 feet wide 4 feet 6 inches deep for 1 burial* 6 feet 6 inches deep for 2 burials* *This allows for standard size coffin depths, maximum 17 inches .	2400mm long x 1200mm wide 1300mm deep for 1 burial* 1900mm deep for 2 burials* *This allows for standard size coffin depths, maximum 430mm.
Cremated remains: flat tablet graves.	35 inches long x 47 inches wide x 18 inches deep	900mm long x 1200mm wide x 450mm deep
Cremated remains: wedge tablet graves.	24 inches long x 18 inches wide x 18 inches deep	600mm long x 450mm wide x 450mm deep
Reading Borough Council reserves the right to change the maximum excavation depth if deemed necessary.		

SECTION 4 - ORIENTATION AND LOCATION OF GRAVES

4.1 Traditionally, Reading Borough Council carries out burials so that all deceased face east. This does mean, on some lawn style grave sections, the memorial will be placed at the foot end of the grave, not at the head. All new areas of the cemetery (Westfield) will be laid to allow headstones only.

4.2 Lawn Graves for Cremated Remains face East and West in alternate rows.

- 4.3 There are three separate areas in Henley Road Cemetery which accommodate coffin burials: Park, Mayfield and Westfield. Each area is designed to accommodate the following grave types:
- **Park:** This area is no longer open to new burials except for additional interments to existing graves.
 - **Mayfield:** This area is split into 4 sections. One for traditional graves and three for lawn graves. Please Note: Double size memorial stones and kerb sets are not permitted in this area.
 - **Westfield:** This area is for multi-faith/non-faith burials, however there is a section allocated for Muslim burials at one end. Lawn graves only are permitted within the multi-faith/non-faith section. Within the Muslim section, there will be an area for lawn graves and one for mounded and traditional graves.
- 4.4 All areas are for multi-faith/non-faith burials, however in Park and Westfield, some sections are allocated for Muslim burials.
- 4.5 Please note, new graves in these areas are double depth to allow up to 2 loved ones to be buried in the same plot should the grave owner request this.

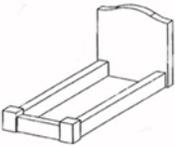
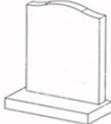
SECTION 5 - GRAVE PREPARATION AND BACKFILLING OF GRAVES

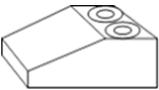
- 5.1 All excavation works, and backfilling will only be undertaken by staff or contractors appointed by Reading Borough Council who are trained to a recognised and accredited standard.
- 5.2 Where safe and possible to do so, Reading Borough Council will allow family backfilling to take place under supervision of Cemetery staff or representatives, subject to the family complying fully with instructions.
- 5.3 In the event of a family wishing to backfill the grave after the service, details must be included on the original notice of interment or at least with three full days' notice before the burial for the Risk Assessments and Health and Safety assessments to take place.
- 5.4 Without exception, no-one under the age of 18 years old is permitted to backfill.

SECTION 6 - DEFINED MEMORIAL AREAS, SIZE & OTHER SPECIFIC RESTRICTIONS

- 6.1 The Defined Memorial Area is the area provided in which memorials, personal planting and memorabilia may be placed. This area differs depending on grave or memorial type. See Section 15 for General Regulations applicable including memorabilia and planting.

Grave	Memorial Area, Size & Other Specific Restrictions
Traditional Graves	<ul style="list-style-type: none"> • The Defined Memorial Area 7 feet long x 3 feet wide (2100mm long x 900mm wide)

 <p>Traditional Graves Continued</p>	<ul style="list-style-type: none"> • Monuments on Traditional graves must be within the following measurements. All measurements shown are the maximum allowed: <ul style="list-style-type: none"> ◦ Kerb set/Memorial slab: 7 feet long x 3 feet wide (2100mm x 900mm) ◦ Kerb Height including cover slab: Maximum 8 inches (200mm) from ground level. ◦ Memorial height: 4 feet (1200mm) from ground level ◦ Memorial depth/thickness: 1 foot (300mm) ◦ Memorial width: 3 feet (900mm) • Marble or other natural stone chippings, laid on a solid foundation, can only be used where there are memorial kerbs. • Personal planting (seasonal flowers only) or items of memorabilia are permitted within the dimensions of the Defined Memorial Area. • Items placed within the Defined Memorial Area may not exceed a height of 12 inches (300 mm). • Trees and shrubs are not permitted and will be removed at the discretion of the Bereavement Services Management. • Only full kerb sets approved by Reading Borough Council are allowed. Borders or fencing of any other kind are not allowed.
<p>Lawn Graves</p> 	<ul style="list-style-type: none"> • Only memorial stones are permitted in lawn grave sections. The location and position of the individual grave will determine if this is a headstone or footstone. This must be placed on the foundation plinth provided by the Council. • Memorial stones on lawn graves should be within the following measurements: <ul style="list-style-type: none"> ◦ Memorial height 3 feet (900mm) from ground level ◦ Memorial depth/thickness 1 foot (300mm) ◦ Memorial width 3 feet (900mm) • Personal planting (seasonal flowers only) or items of memorabilia are permitted in a small area in front of the memorial stone but must not exceed a height of 12 inches (300mm). • The personal planting/memorabilia area must be no wider than the base of the memorial stone and a maximum of 2 feet (600mm) long, measured from the edge of the upright headstone (not the foundation stone). • If the personal planting/memorabilia area is not tended, Reading Borough Council reserves the right to seed or turf the area. • As soon as possible after the funeral, usually within a 12-month period, Reading Borough Council will either sow grass seed or turf over the grave.

<p>Mounded Graves</p> <p><i>Picture to follow</i></p> <p>Mounded Graves Continued</p>	<ul style="list-style-type: none"> • The Defined Memorial Area 7 feet long x 3 feet wide (2100mm long x 900mm wide) • Mounds must not exceed 300mm high. Only soil provided by Reading Borough Council is to be used. • The mound is created with a natural living cover, no further planting is allowed. • The natural living cover will be maintained by the Council to ensure it remains fit for purpose. • The grave can have a memorial stone, which will be either a headstone or footstone. This will be determined by the location and position of the individual grave. • Memorial stones on mounded graves should be within the following measurements: <ul style="list-style-type: none"> ○ Memorial height 3 feet (900mm) from ground level ○ Memorial depth/thickness 1 foot (300mm) ○ Memorial width 3 feet (900mm) • A plaque, rather than a memorial stone, may be placed at the head or foot of the grave depending on the location and position of the grave. • The plaque must not exceed 12 inches long x 6 inches wide (300mm long x 150mm wide) and approval of the plaque material must be obtained from the Bereavement Services Manager.
<p>Cremated Remains: Wedge Tablet Grave</p> 	<ul style="list-style-type: none"> • Provision is made for the interment of two standard size caskets of Cremated Remains. A maximum of 12 x 9 x 6½ inches. (300mm x 228mm x 165mm). If larger caskets are used there may only be space for one interment. • Only memorials in the shape of a Wedge Tablet may be installed. • The tablet shall be of natural quarried stone, with facilities for one or two sunken flower vases at the thicker end. • Tablet measurements must not exceed: <ul style="list-style-type: none"> ○ Wedge tablet maximum length - 18 inches (457mm) ○ Wedge tablet maximum width - 15 inches (381mm) ○ Wedge tablet maximum height (thick end) - 6 inches (152mm) ○ Wedge tablet maximum height (thin end) 3 inches (76mm) • The tablet must be placed on the foundation stone provided by the Council, set at ground level, measuring a minimum of: 24 inches length x 18 inches wide x 2 inches thick (600mm x 457mm x 50mm) • The memorial is placed 3 inches (76mm) from the rear of the foundation stone and at equal distance at both sides.

	<ul style="list-style-type: none"> • Personal planting (seasonal flowers only) or items of memorabilia are permitted in a small area in front of the memorial stone, measuring: 8 inches long x 2 feet wide (200mm wide x 600mm long) (The Defined Memorial Area) • Items placed within the Defined Memorial Area may not exceed a height of 12 inches (300 mm).
--	---

6.2 Subject to weather and seasonal changes Reading Borough Council, will keep all grassed areas tidy. Mounded graves will also be maintained by the Council. Any memorials or kerb sets will not be cleaned or maintained by the Council, these are the responsibility of the owner.

6.3 In addition to the above Grave types, alternate memorials are available:

Other Memorials	Defined Memorial Area	Dimensions*
Bronze Kerb Plaque in Gardens of Remembrance	Behind memorial plaque	12 inches long x 6 inches wide (300mm long x 150mm wide)
Vase blocks in the Central Square, Gardens of Remembrance	Behind the vase block, up to the kerb stone edge.	12 inches long x 7 ½ inches wide (300mm long x 190mm wide)
Any other memorial (including new memorial options)	Will be specified in the terms & conditions for that specific memorial	Will be specified in the terms & conditions for that specific memorial

SECTION 7 - GRAVE ALLOCATION AND OWNERSHIP

7.1 The grave spaces are used in strict consecutive order or as required by the Bereavement Services Management. Selection of a grave space is not possible.

7.2 No grave may be pre-purchased by any person or Group for future use, to ensure the usable life of the cemetery is prolonged to ensure burial space for the future.

7.3 Double depth graves allow for loved ones to be buried together, however it is not possible to purchase additional plots adjacent to each other. The fee for a double depth must be paid at the time of the first interment.

7.4 Any person over the age of eighteen may purchase the Exclusive Right of Burial for a period of seventy-five years. The period of seventy-five years falls within the legal limit of 100 years which is the maximum that burial rights can be purchased under current legislation in England and Wales. Upon expiry of the seventy-five years, the lease can be renewed if the family wish. The standard fee is payable.

7.5 The fee for the Exclusive Right of Burial must be paid at the time that the arrangements are made at the Cemetery Office and a Grave Deed will be issued to the Grave Owner soon after.

- 7.6 The Deed will confirm the number of burials permitted within the grave. The Deed does not mean the Grave Owner owns the land. The Deed means the Grave Owner owns the Right to Bury, but only for the seventy-five-year term. The land remains in the ownership of Reading Borough Council.
- 7.7 It is the Grave Owner's responsibility to let the Cemetery Office know of any change of address.

SECTION 8 - TRANSFER OF RIGHT OF GRAVE OWNERSHIP (EXCLUSIVE RIGHTS)

- 8.1 A transferred 'Right of Ownership' to a grave is only valid if it has been registered and agreed by the Cemetery Office.
- 8.2 It is advisable that once the Grave Owner has been interred within the grave, arrangements are made for the transfer of ownership. No further burials, interments of cremated remains, scattering of cremated remains, additional inscriptions on memorials or installation of new memorials will be permitted until entitled ownership has been established.
- 8.3 In cases where the original purchaser is deceased, the new owner must demonstrate ownership of the grave by producing a) A valid Will, b) Grant of Probate, c) Letters of Administration or d) if the others are missing, a completed Statutory Declaration witnessed by a Commissioner of Oaths e.g. Solicitor (please contact office for more details).
- 8.4 A fee is charged for accepting this documentation which must be paid at the time the form is presented at the Cemetery office. The form will be retained at the Cemetery Office as a permanent record of the instruction to authorise the grave to be opened.
- 8.5 The number of joint owners will be limited to three and any change of circumstances, will require the agreement of all joint owners. Where one of the owners passes away, ownership is retained by the remaining two, however, a copy of the death certificate will be required.

SECTION 9 - COFFINS

- 9.1 Where the burial is in an earth grave, the body must be placed in a wooden, cardboard or wicker coffin, casket or shroud. If the burial is to be in a brick lined grave or vault, the body should be placed in an airtight inner case of lead or zinc and covered with an outer wooden shell.
- 9.2 Coffins used for cremation must comply with the requirements of the Federation of British Cremation Authorities. <https://www.fbca.org.uk/>
- 9.3 The Funeral Director in charge of the funeral should arrange for at least FOUR people to carry the coffin to the chapel and graveside. It is the responsibility of the Funeral Director to increase the number of bearers' subject to Health and Safety considerations.

SECTION 10 - EXHUMATION

- 10.1 Once a body or cremated remains have been buried, they can only be removed with permission from the Bereavement Services Management and a licence granted by the Ministry of Justice. In the case of consecrated ground, consent from the Church of England (called a faculty) will also be required.
- 10.2 Any disturbance of remains is deemed to be an exhumation.

SECTION 11 - DISPOSAL OF CREMATED REMAINS

- 11.1 Each individual set of cremated remains will be reduced and placed in a container to await the wishes of the applicant regarding its final disposal.
- 11.2 Where specifically requested, cremated remains can be held at the Crematorium, for a period not exceeding three months. A charge will be made after the initial month.
- 11.3 In respect of any set of cremated remains left at the crematorium and not removed by the end of the three-month period. Two weeks' notice will be given to the applicant for cremation, after which the cremated remains may be reverently and permanently scattered in the grounds allocated for that purpose.
- 11.4 All metals remaining after cremation, including orthopaedic implants will be sensitively recycled. This is to ensure that all metals are disposed of in a suitable manner that will reduce the impact on our environment, and to comply with current legislation. It is possible to have metal remains returned if requested prior to cremation.
- 11.5 The Central Square in the Gardens of Remembrance and other locations as specified from time to time by the Bereavement Services Management are not to be used for the scattering of cremated remains. This is to maintain the ecology and landscaping in the grounds.
- 11.6 All scatterings of cremated remains are to be organised through the Cemetery office.
- 11.7 Scatterings can only take place on graves with the written permission of the grave owner.

SECTION 12 - ERECTION AND REPAIR OF MEMORIALS

- 12.1 Only Memorial and Stonemasons registered with and fixing to the standards of BRAMM (British Register of Accredited Memorial Masons) or NAMM (National Association of Memorial Masons) and Reading Borough Council's Registration Scheme are permitted to erect memorials within the cemeteries and churchyards administered by the authority. This also applies to memorials being re-instated after their removal to permit an interment or additional works to be carried out.
- 12.2 Work may only be carried out by masons with a valid 'fixers' licence.

- 12.3 The identification number of each grave must be included at the foot of all monuments, gravestones or ledger stones on private graves.
- 12.4 All new memorials shall be subject to a Permit not exceeding 30 years and linked to the memorial masons' guarantees. During this period the memorial shall be subject to testing to ensure stability. Tests will be carried out every five years or sooner and in accordance to a nationally recognised standard.
- 12.5 Should a memorial fail a safety test, the cemetery management, in accordance with health and safety requirements, will make the memorial safe under the terms of the Memorial Safety Policy.
- 12.6 Where Grave Owners can be identified, Reading Borough Council will notify the Grave Owner(s) of a failed Memorial safety test in writing. The Grave Owner will be requested to arrange for the Memorial to be made safe within a specific time period. Where the Council are unable to trace the grave owner, or the Grave Owner fails to respond, the Council reserve the right to make safe the Memorial by using the 'socketing' method. Socketing involves the Memorial stone being lowered into the ground to reduce the height to a safe level.
- 12.7 Details of the NAMM Code of Working Practice, the British Register of Accredited Memorial Masons and the Local Authorities' Cemeteries Order 1977 are available from the Cemetery office upon request. (<https://www.namm.org.uk>)
- 12.8 Work can only be carried out in the cemeteries Monday to Friday between 9.00am and 4.00pm. No work is to be carried out on weekends or Bank Holidays. All contractors must report to the office before working on site.
- 12.9 The Bereavement Services Management must be contacted before fixing or erecting any monument or memorial, with details of the measurements and design, a copy of the proposed inscription, and a sample or specification of the material to be used.
- 12.10 Monuments may only be erected on a grave for which the exclusive right of burial has been purchased. Erection or removal of monuments and memorials must be done only after an officer from Reading Borough Council has been on site with the applicant to agree the location and type of work to be carried out.
- 12.11 Material for the memorials should be natural stone such as Portland, Granite, Marble or Hopton wood.
- 12.12 Wood memorials (cross or headstone) are permitted, provided they are fixed by a professional "fixer" approved by Reading Borough Council to standards as above, and come from verifiable sustainable sources.
- 12.13 A permit is required for any work to be carried out on a memorial. A fee is payable for the permit and must be paid in full at the time of application.
- 12.14 Restriction on Memorial Inscriptions:

Where the Grave Owner requires an inscription to be in any language other than English, a full translation shall be supplied to the Cemetery Office, prior to any works being carried out.

12.15 Masons who wish to add their names to memorials or monuments must follow the guidelines below:

- a) the inscription should be limited to the name of the stonemason only
- b) the letters should be no more than **½ an inch in height** (12.7mm)
- c) the inscription should be on the base of the memorial or monument at a maximum height of **6 inches** (152mm) above ground level.

12.16 Foundations:

It is the responsibility of the Mason to ensure the memorial is fixed to adequate foundations as recommended by the NAMM Code of Working Practice. The authority cannot accept any responsibility for any foundation supplied unless the memorial has been fixed in accordance with the NAMM Code.

12.17 Removal of memorials for burials:

If a memorial needs to be removed from the cemetery to allow a burial to take place, this should be done by an approved memorial stonemason who should ensure that it is re-fixed within 12 months.

SECTION 13 - OTHER MEMORIALS (plaques, benches etc)

13.1 A full list of memorial options is available at the Cemetery Office. This includes plaques, vases, benches, trees, Book of Remembrance entries. Other memorial options and areas may become available over time at the Henley Road Cemetery and Crematorium.

13.2 Memorial benches are available from time to time through a lease agreement. It is not permitted to place any other bench in the Cemetery or Gardens of Remembrance. Bench locations are at the discretion of the Bereavement Services Management.

13.2 Memorial trees are available from time to time through a lease agreement. It is not permitted to place or plant any other tree in the Cemetery or Gardens of Remembrance.

13.3 All Regulations apply to the Rose Garden as to other areas of the Cemetery and Gardens of Remembrance.

13.4 The defined memorial area for any new memorials offered for lease, will be specified in the terms and conditions for that memorial.

SECTION 14 - FLOWERS AND FLORAL TRIBUTES

14.1 Following a funeral service, floral tributes should be placed in front of the appropriate named stand in the display area outside either the West or South Chapel. Any tributes left elsewhere will be removed.

- 14.2 Floral tributes from funeral services, if not collected by the Funeral Director, will be removed and disposed of three days after the funeral service by the Cemeteries staff.
- 14.3 Fresh cut flowers may be placed in the receptacles provided in the Hall of Memory. No floral tributes, pot plants or other items may be left in this area.
- 14.4 All wrappings should be removed and disposed of in the bins provided.
- 14.5 All perished floral tributes and cut flowers will be removed by Cemeteries staff at their discretion.
- 14.6 Reading Borough Council cannot be held responsible for any floral tributes that cannot be found. Floral tributes are left at the family's own risk.

SECTION 15 - GENERAL REGULATIONS RELATING TO OTHER ITEMS OF MEMORABILIA AND CHRISTMAS WREATHS (all areas of all cemeteries)

- 15.1 All graves and memorials have a Defined Memorial Area (except Cremated Remains Wedge Tablet Grave). Defined Memorial Areas for each grave type have been specified in Section 6
- 15.2 On Cremated Remains Wedge Tablet Graves, only fresh cut and artificial flowers are permitted in the sunken vases. No other item is permitted on or nearby these graves.
- 15.3 In the Gardens of Remembrance the defined memorial area for plaques is **6 inches wide by 12 inches long**. (150mm wide x 300mm long)
- 15.4 In the Central Square in the Gardens of Remembrance the defined memorial area for vase blocks is **7 ½ inches wide by 12 inches long**, (190mm wide x 300mm long) as defined by the kerb stone located behind the vase block.
- 15.5 Only artificial flowers, fresh cut flowers and seasonal flowers in pots are permitted in the defined memorial area behind vase blocks in the Central Square. This is to maintain the original design concept for the Square, providing a formal and attractive place for remembrance.
- 15.6 Items placed within the Defined Memorial Area may not exceed a height of **12 inches** (300 mm).
- 15.7 The following items are not permitted anywhere within the Cemetery or Gardens of Remembrance:
 - Any item overlapping or outside the defined memorial area
 - Any glass items, including vases
 - Food and drink of any kind is not permitted as it attracts vermin.
 - Helium balloons as these exceed the maximum height permitted for memorials a (see section 6) and when deflated become dangerous to wildlife.
 - Chippings, pebbles and stones (except within a full kerb set on a traditional grave)
 - Fencing, edging or borders of any kind around or within a defined memorial space
 - Any item deemed to be offensive, dangerous or unbecoming of a cemetery

- 15.8 Any such items will be removed by Cemetery staff at their discretion and without the need for prior notice to the Grave Owner.
- 15.9 It is not permitted to plant shrubs or trees anywhere in the Cemetery or Gardens of Remembrance. These will grow to a large size, produce roots which unbalance headstones and cause additional maintenance and cost.
- 15.10 Weathered artificial flowers or mementos (e.g. wet and discoloured soft toys, such as teddy bears) will be removed at the discretion of the Bereavement Services Management.
- 15.11 Grass cutting and maintenance may not be carried out around plots which do not conform to regulations in terms of size or what is put on and around them.
- 15.12 The Grave Owner may be liable if items on or around a memorial, which are in breach of regulations, cause injury to persons or damage to machinery.
- 15.13 It is not permitted to hang any item on trees within the Cemetery or Gardens of Remembrance, as this may damage the tree or and frighten off wildlife.
- 15.14 Planting (seasonal flowers only) is only permitted within the personal Defined Memorial Area (see Section 6). Planting anything, in any other location is prohibited and the items will be removed at the discretion of the Bereavement Services Manager.
- 15.15 Christmas wreaths may be placed within the Defined Memorial Area (see section 6), and on the Lych gate fencing during the Christmas period. Wreaths will be removed from 1 February onwards.
- 15.16 All other Christmas decorations will be removed after 7 January.
- 15.17 The Council does not accept any encroachment into common areas or on to other graves by any individual(s). Any contravention of this will result in any items found to be outside of the Defined Memorial Area being removed.
- 15.18 The Council reserves the right to periodically request the removal of all items placed from behind or on memorials, or from trees and shrubs, having initially given the owner of the memorial lease an opportunity to do so themselves. The Grave Owner is required to adhere to this request by the deadline specified in the Notification. Where no response is received from the Grave Owner by the deadline date, the Council reserves the right to proceed with the removal of items.
- 15.19 The requirement to give prior notice to the Grave Owner does not apply where the items may cause offence to others, are dangerous, cause a health and safety risk, are unbecoming of a cemetery, encroach on areas where burials or scatterings may have taken place, exceed the defined memorial area, or where planting may grow to an unacceptable size.

- 15.20 The Council will adhere to the published Enforcement framework (see Appendix 1) which details how infringements will be dealt with including time frames and storage information.
- 15.21 The Council reserves the right not to renew memorial leases where leaseholders are in regular infringement of regulations.

SECTION 16 - VEHICLES

- 16.1 If a funeral procession is to be led headed by any vehicle other than a motor driven funeral hearse, permission should be obtained from the Bereavement Services Management, to ensure this can be accommodated. This includes, but is not limited to, horse-drawn hearses, gun carriages and other vehicles of this type.
- 16.2 Vehicles must not be left unattended for long periods of time in the cemeteries.
- 16.3 No unauthorised vehicle is to be left in front of the chapels.
- 16.4 Vehicles are not allowed in the cemetery beyond the main car parking area, except for vehicles displaying a disability badge, funeral directors and approved contractors. This is to provide a vehicle-free environment for pedestrians.
- 16.5 The maximum speed limit within the Cemetery grounds in the cemetery is 10 miles an hour.
- 16.6 Driving or parking on grassed areas or pathways between sections of the cemetery is not permitted, unless under exceptional circumstances when it is agreed by the Bereavement Services Manager.
- 16.7 All vehicles are parked at the Owners own risk.

SECTION 17 - GENERAL RULES AND REGULATIONS

- 17.1 Children under the age of 14 years must be accompanied by a responsible adult when visiting the cemetery.
- 17.2 Only Assistance dogs, such as guide dogs are allowed in the cemetery.
- 17.3 Search of the Burial Register:
Reading Borough Council may charge a fee for a search of the burial register held at the Cemetery Office (For more detailed information, see the current list of fees and charges or contact the Cemetery Office).
- 17.4 Official Plan
A plan of the cemetery, showing the position of every grave is kept at the cemetery office and is freely accessible for everyone to use.
- 17.5 Photography and filming

Photography and filming are prohibited without prior consent from the Bereavement Services Management . Permission is not guaranteed.

- 17.6 Families or a representative of a family however, may photograph an individual memorial.
- 17.7 The Authority reserves the right to charge for any commercial filming that may take place within the site
- 17.8 Risk:
All persons entering the cemetery do so at their own risk. The Council shall not be liable for any injury or damage sustained, regardless of the form of action, whether in contract, tort (including negligence or breach of statutory duty), strict liability or otherwise, **except** in respect of personal injury or death of any person caused by the Council's negligence.
- 17.9 As above, the Council shall not be liable for personal property brought on to the site or for any damage or loss of memorials or memorabilia. This includes any damage or loss to flowers.
- 17.10 Damage to land and premises
Reading Borough Council will hold any individual(s) responsible for any damage caused to cemetery land, walls, flower beds, lawns or premises by any cause whatsoever, including where the individual(s) have exceeded what regulations permit in terms of memorials and memorabilia. Any costs of repairing the damage may be passed on to the individual(s) involved.
- 17.11 No person shall trade any goods or services within any of the cemeteries except with the permission of the Bereavement Services Management.
- 17.12 Visitors to the Cemetery must conduct themselves in a quiet and orderly manner and must keep to the roads and pathways clear, except when visiting graves.
- 17.13 All persons admitted to the cemetery will be subject to the directions of the Bereavement Services Management and any person infringing the Regulations may be removed from the cemetery.
- 17.14 The use of drones is not permitted within the cemetery grounds unless for legitimate and operational reasons. In all circumstances, permission must be obtained from the Bereavement Services Management prior to use. Any costs to repair damage caused by the drone to any property, including memorials, within the cemetery grounds will be the responsibility of the individual involved.
- 17.14 The Council may at any time vary, alter or revoke any of the foregoing Rules and Procedures.

SECTION 18 - FEES & CHARGES

- 18.1 A list of the fees and charges for services provided is available on the Reading Borough Council website and from the Cemetery Office. All payments must be made in advance.

<https://www.reading.gov.uk/life-events/deaths/crematorium-and-cemeteries/fees>

READING CEMETERIES & CREMATORIUM REGULATIONS - APPENDIX 1

Framework for Enforcement of Rules & Regulations

Introduction

The Public Consultation undertaken in 2021 identified that customers were keen for the Rules and Regulations to be enforced fairly, consistently and in a timely manner to ensure that the grounds were kept safe and tidy. The Council consulted widely with residents, memorial owners, families of the bereaved and other stakeholders about amending the Rules and Regulations that apply to Reading Cemeteries and Crematorium. Revisions were made to support the implementation of the Charter for the Bereaved by offering more choice, whilst giving the Service the regulatory framework necessary to ensure a safe and dignified environment for all visitors, which is sympathetic to the landscape. The Enforcement Framework has been updated following the consultation.

This Enforcement Framework forms part of the Rules and Regulations as an Appendix. It makes clear how the Council intends to deal with any infringement of the Regulations and how this will be communicated to the person(s) concerned.

The Council recognises the importance of memorials to families after a bereavement and therefore any action to enforce Regulations will be taken in a sensitive and measured way.

Principles behind Enforcement Framework

The underlying principles behind the Enforcement Framework are:

- to ensure equal treatment for all;
- to ensure it is clear to everyone what will happen if Regulations are infringed;
- to ensure a safe and dignified environment for all visitors.

The Enforcement Framework

The Bereavement Services Management will

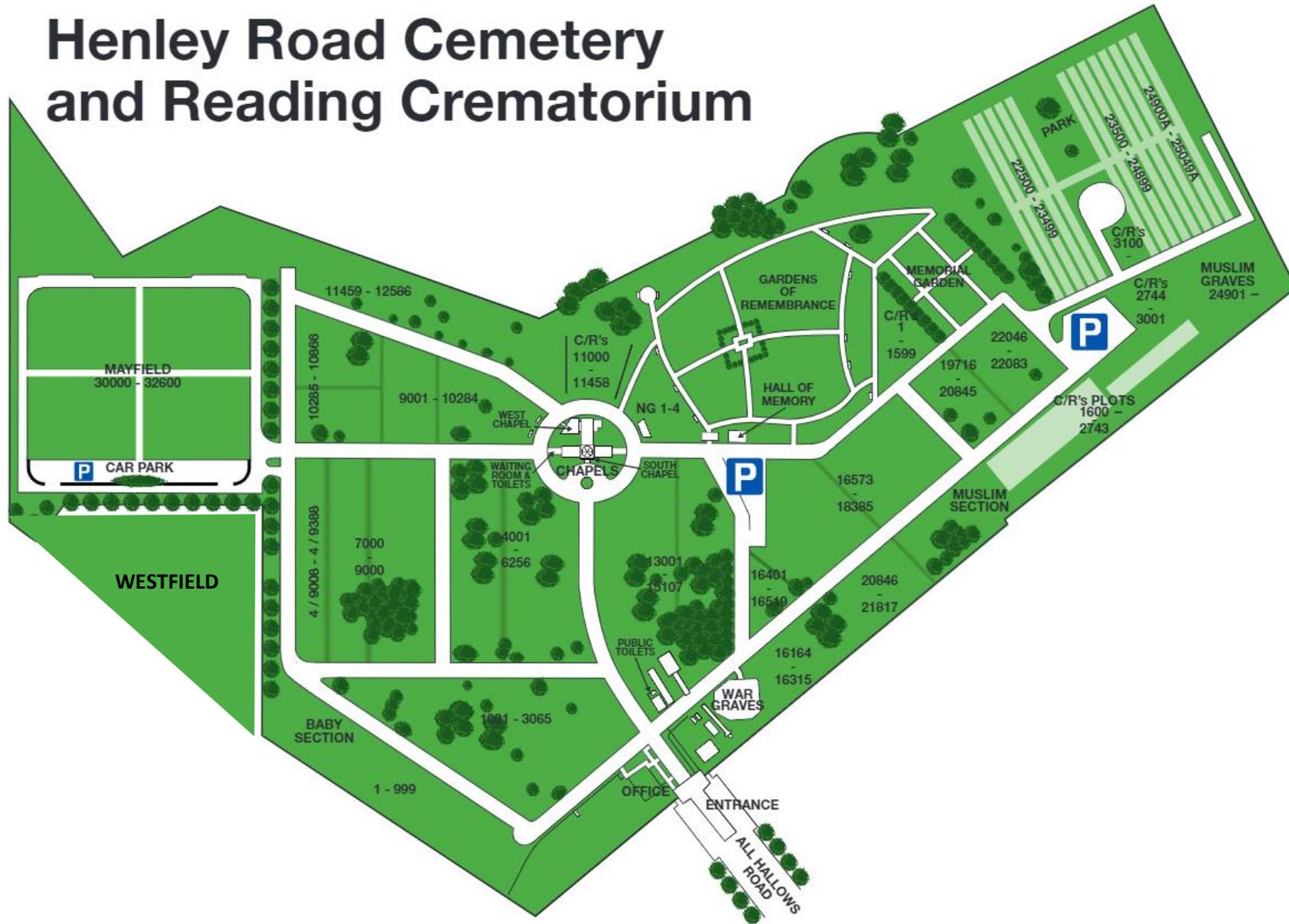
1. Prioritise areas of the grounds where the most infringements of Regulations are taking place.
2. Put up public notices in and near the area to be addressed.
3. Put up public notices in the Cemetery Office.

4. Public notices will specify the following:
 - a. Precisely what area is to be addressed
 - b. Date the notice is put up
 - c. Date the notice period ends
 - d. Defined memorial area where personal items may be placed
 - e. Items that are not allowed
 - f. What will happen to any items infringing the Regulations
 - g. How to contact the Bereavement Services Management
5. A notice period of 6 weeks will be specified.
6. Where records are available and considered to be in date, letters will be sent to all memorial owners in the area to be addressed, clearly stating that any items infringing Rules & Regulations need to be removed within the 6 week notice period. Information included will be identical to that on the public notices.
7. After the specified time period has expired any remaining items that infringe regulations will be removed with the utmost care and sensitivity.
8. Where possible removed items will be put in individual labelled bags and stored for 12 months.
9. After 12 months, any individual labelled bags of items not collected will be disposed of.
10. Any plants, trees or shrubs will be labelled and retained for collection where possible.
11. When it is not possible to remove any plant, tree or shrub without damaging it, it will be disposed of with other green waste at the cemetery.
12. Any memorial owner with concerns should address these to the Bereavement Services Management for consideration
13. If a memorial owner wishes to make a formal complaint about the removal of personal items, this will be dealt with through the council's complaint procedure. Details can be found on the Reading Borough Council website:

<https://www.reading.gov.uk/council/feedback/make-a-complaint-or-comment>

The above enforcement framework will not apply where items must be removed immediately because they may cause offence to others, are dangerous, cause a health and safety risk, are unbecoming of a cemetery, encroach on areas where burials or scatterings may have taken place, exceed the defined memorial area, or where planting may grow to an unacceptable size.

Henley Road Cemetery and Reading Crematorium



GRAVE TYPES

Lawn Graves:



Mounded Graves:



Traditional Graves:



Appendix 2

PUBLIC CONSULTATION - CEMETERY SERVICES - RESULTS SUMMARY

INTRODUCTION

The public consultation ran for a period of 45 days: 28 June 2021 - 12 August 2021 inclusive.

Responses received - 255

The launch of the consultation was publicised as follows:

- Press release
- RBC Policy and Voluntary Sector Manager issued a formal launch email to all the relevant contacts both within RBC and externally requesting they forward the launch email to all groups within their network. The emails went to
Kiar Greyfaulk - contact for Traveller community contacts
Nina Crispin - contact for 'older people' and PDSN community groups
Nisa Unis - contact for religious, faith and diverse ethnic and cultural communities
Helen Bryant - contact for ADWG
Victor Koroma - ACRE
- Reminder requests were issued to the above within 14 days of the consultation close date.
- Posters, complete with website link & QR code were displayed across Henley Road cemetery and at the gates to Caversham Cemetery and Reading Old.
- Posters were also displayed in local library windows.
- A reminder / prompt message was issued using RBC Twitter & Facebook accounts within 4 days of the consultation closer date.

In addition, two presentations were delivered to the Muslim Community. One on 22 July 2021 to mosques leaders and representatives from the Pakistani Community Committee and one on the 28 July 2021 to general members of the Muslim community previously invited to the original meetings in March 2021.

A presentation opportunity was offered to the Chair of ACRE for other BAME communities.

DEMOGRAPHIC INFORMATION:

Please note:

All % figures in the following tables have been rounded so may not add up to 100%

Respondents: 251 responses in total - shown below in descending order:

Option	Total	Percent %
Resident	152	60
Service user	59	23
Family or friends of service users	27	11
Other * (see below)	8	3
Employee of RBC	4	2
Business	1	1
Total	251	
Not Answered	4	2

Respondents were invited to add comments if they answered **OTHER** to the question.

Comments would indicate a misunderstanding of the term 'Service User'. Except for 2 respondents, all 'Others' would sit within Service user or family/friend of service user categories.

Age of Respondents: 248 responses in total - shown in descending order:

Option	Total	Percent %
55-64	59	23
45-54	50	20
65-74	47	18
35-44	47	18
25-34	22	9
75+	19	7
17-24	4	2
Under 16	0	0
Total	248	
Not Answered	7	3

Disability - 248 responses in total - shown in descending order

Option	Total	Percent %
No	213	60
Yes	35	23
Total	248	
Not Answered	7	3

Ethnicity - 245 responses in total - shown below in descending order:

Option	Total	Percent %
White British	148	58
Asian or Asian British - Pakistani	57	22
Prefer Not Say	15	6
White - Any other White background*	6	2
Asian or Asian British - Indian	4	2
Other ethnic group - Arab	3	1
Asian or Asian British - Chinese	2	1
Black or Black British - Caribbean	2	1
White - Irish	1	1
Mixed - White and Black Caribbean	1	1
Mixed - White & Black African	1	1
Mixed - Any other Mixed background*	1	1
Asian or Asian British - Bangladeshi	1	1
Asian or Asian British - Any other Asian background*	1	1
Black or Black British - African	1	1
Black or Black British - Any other black background*	1	1
White - Gypsy or Irish Traveller	0	0
Mixed - White & Asian	0	0
Other ethnic group - Any other ethnic group	0	0
Don't know	0	0
Total	245	
Not Answered	10	4

* Respondents were asked to specify their ethnicity if they select “Any other background”
9 people provided more information. 1 person chose not to leave a comment

White English (1)	White Viking (1)	White English/Spanish (1)
British European (1)	European (1)	American (1)
Mixed (1)	Sri Lankan (1)	Turkish (1)

Religion - 246 responses

Option	Total	Percent %
Christian	99	39
Muslim	75	29
No Religion	49	19
Prefer not to say	16	6
Other*	5	2
Buddhist	2	1
Hindu	0	0
Jewish**	0	0
Sikh	0	0
Total	246	0
Not Answered	9	4

* Respondents were asked to specify their religion where the response was 'OTHER'

Jehovah's Witness (1)	Quaker (1)	Seven Day Adventist (1)
Wiccan (1)	Secular (1)	

**Please note,

The Secretary of the Reading Hebrew Congregation thanked us for the invitation but confirmed it was not appropriate to contribute to the consultation as the community used the Jewish Cemetery in North London.

Gender - 247 responses

Option	Total	Percent %
Female	130	51
Male	105	41
Prefer not to say	11	4
Prefer to self-describe	1	1
Total	247	
Not Answered	8	3

Sexuality - 242 responses

Option	Total	Percent %
Heterosexual/straight	201	79
Prefer not to say	33	13
Bisexual	4	2
Gay or Lesbian	3	1
Other	1	1
Total	242	
Not Answered	13	5

This information was collected, but as per the Equality Impact Assessment states, an individual's gender or sexuality is not relevant to any decision making in this instance.

RESPONSES TO THE KEY AREAS OF THE CONSULTATION

The consultation focused on four key areas. This summary report will predominantly focus on these four topics:

- 1) Amendments to the Cemetery Rules and Regulations
- 2) Grave types
- 3) Opening hours and resources
- 4) Accessibility on site

INTRO: Amendments to the Cemetery Rules and Regulations

It is a legal requirement for all local authority cemeteries to have Rules and Regulations. The Rules and Regulations set out our service offer and requirements in respect of:

- The size and types of graves and memorials permitted
- Opening hours for the grounds, the office and times available for burials
- The type of adornments / planting allowed on graves
- General health and safety requirements and key operating practices
- The way we enforce our Rules and Regulations

These Rules and Regulations are designed to:

- Ensure the safety of the customers, visitors and staff
- Ensure the cemetery is a pleasant and peaceful environment for customers and visitors Ensure fair treatment for all
- Provide the cemetery staff with the authority to enforce compliance with the Rules and Regulations where necessary

The full Rules & regulations were provided within the consultation web link. The report provided to the Policy Committee in June highlighting the key changes was also available.

WE ASKED: Are the Rules & Regulations easy to understand?

Option	Total	Percent %
Yes	214	84
No	27	11
Total	241	
Not Answered	20	8

Respondents were invited to add comments if they answered **NO** to the question. By the nature of the question, comments will be predominantly negative. However, some positive comments made.

29 additional comments were made. Key messages are:

Topic
<p>Layout -</p> <ul style="list-style-type: none"> • 8 respondents had not read them, • 3 respondents stated they are too wordy / lengthy • 2 respondents stated they looked clear & comprehensive • 1 respondent commented on too much legislation detail • 1 respondent commented on too many complicated words • 1 respondent did not like the font used <p style="text-align: right;">Page 62</p>

Enforcement:

- 2 respondents commented on lack of enforcement:
 - People aren't following them, and no-one is enforcing them
 - It's become a free for all - people with bigger headstones than they should have.

Communication:

- 5 respondents did not know where the Rules & Regulations can be found or displayed*
- 3 respondents commented they need to be communicated into the community**
- 2 respondents stated they are too complicated to understand
- 1 respondent stated they should be issued in every language (no language specified)
- 1 respondent commented they are confusing unless you speak to someone face to face

* The Rules & Regulations were included in the consultation link

** These referenced the Muslim community

WE ASKED: Are the Rules & Regulations balanced & fair?

Option	Total	Percent %
Yes	198	78
No	37	15
Total	235	
No Answer	20	8

Respondents were invited to add comments if they answered **NO** to the question. By the nature of the question, comments will be predominantly negative. However, some positive comments were made.

Related comments: 34 additional comments were made. Key messages are:

General:

- 12 respondents stated they had not read them

Faith & Religion: Several people stated:

9 comments related to faith/religion/culture - The 3 main messages were:

- The focus is more on meeting the needs for the wider community (white) than the minority community (middle eastern/Asian)
- More consideration needs to be given to the Muslim faith & beliefs
- Different cultures should be able to express themselves

Enforcement & Consistency:

3 respondents referred to enforcement & consistency:

- Only if they are followed enforced / only if adhered to with no exceptions for whatever reason.
- The Rules & Regulations are fair, but inconsistency in enforcement is not.
- There is discrimination on what can and cannot be allowed in terms of grave types

Memorials:

- 3 respondents stated there should be no restrictions regarding memorabilia or memorials and families should be able to plant/decorate a grave in which ever manner they see fit.
- 2 respondents made reference to cost and the restriction of using an approved stone mason.

WE ASKED: Are there any additional Rules & Regulations to propose?

Option	Total	Percent %
No	195	76
Yes	33	13
Total	228	
Not Answered	27	11

Respondents were invited to add comments if they answered **YES** to the question.

Related comments: 33 additional comments were made. 12 responses did not relate to the question.

Key messages are:

Faith & Religion:

- 4 comments related to grave types based on faith needs.
- 3 respondents stated:
 - The Rules & Regulations should be based on Islamic faith
 - The Muslim Community should be involved in any decision making.
 - The family of the deceased should be allowed to decline a post-mortem on the body.

Enforcement & Consistency:

- 7 respondents specifically requested tighter enforcement in respect of items left on or around memorials - for example:
 - Additional authority allowing staff to automatically remove items from graves e.g dead flowers, faded silk flowers, balloons, old toys etc.
 - Stricter enforcement - act if rules are ignored e.g fines imposed
 - No helium balloons should be allowed / plastic covered tributes - Not environmentally friendly
 - Rules & Regulations quoted are ok but only if they are followed, enforced and adhered to with no exceptions for whatever reason.
 - The Rules & Regulations are fair, but inconsistency in enforcement.
- 3 respondents require tighter car parking restrictions and controls.
- 2 respondents referred to more respect needed by other visitors: specific reference was made to the use of mobile phones near graves/memorials, loud music, BBQ's and children left to play in and around memorials.

Opening Hours:

- 5 comments related to opening hours. All comments were in relation to Muslim burials and the request to have weekend and Bank Holiday burials. For example:
 - Opening Hours and Resource (We ask for the council to provide services over the weekend and bank holidays)
- These comments will be focused on in the sections dedicated to the subject.

Memorials:

- 2 respondents stated they should be allowed to do whatever they want on or around a grave
- 1 respondent feels they should be able to get memorials and headstones from anywhere.
- 3 respondents stated there should be no fees to the Council for providing permits to stonemasons or remedial work to fix memorials

WE ASKED: Additional feedback and comments

Respondents were provided the opportunity to give general feedback and comments in respect to the Rules & Regulations. By the nature of the question, a mixture of positive, neutral and negative comments was expected.

42 additional comments - 11 responses did not relate to the topic and the remaining 31 comments were repeats of the comments given in respect of the previous question. For the purpose of this summary, they are not included.

Section 2 Grave Types

It is proposed a new ‘Mounded’ grave option is introduced, specifically to meet the needs of our Muslim Communities. This will mean there are three grave type options available: Traditional, Lawn and Mounded. Not all grave types will be permitted in all areas of the cemetery.

The location of the grave within the cemetery will determine the type of grave available. Making this change will marginally reduce the amount of land available for burials across the site.

The burial ground capacity is limited at our Henley Road cemetery, with approximately 8 years of burial space remaining. Therefore, burial plots adjacent to each other will no longer be available for reservation or pre-purchase.

A family can still choose to be buried together, but the only option will be for a single grave plot to be prepared for burials at double or treble depth. The choice to have a double or treble depth grave will need to be made at the time of the first burial into the plot.

Additional Information regarding the proposed grave types was made available for all respondents to access.

WE ASKED: If you or a family member have chosen a burial, does the cemetery provide a grave type to meet the requirements of your need, faith, or religious beliefs?

Option	Total	Percent %
Yes	139	55
Not Applicable	60	24
No	36	14
Total	235	
Not Answered	20	8

The vast majority of respondents stated that the grave types did meet their requirements (55%) or that this was not applicable (24%). Additional scrutiny of the data shows the split of the answers by religion:

Option	Yes		Not Applicable		No		Not Answered	
	Total	Percent %	Total	Percent %	Total	Percent %	Total	Percent %
Christian	62	63	25	25	3	2	9	9
Muslim	35	47	8	11	27	36	5	7
No Religion	25	51	19	39	1	2	4	8

Prefer not to say	6	38	5	31	4	25	1	6
Other	5	100						
Buddhist	1	50	1	50				
Total	134		57		35		19	

- Notably 51% of those specifying ‘no religion’ stated the service met their needs and 39% stated it was not applicable.
- The majority of Christian religion (63%) stated the service met their needs and 25% stated it was not applicable.
- For those specifying Muslim religion, the picture was mixed with 47% stating the proposal did meet their needs, 36% stating it did not meet their needs and a further 11% stating it was not applicable. Of those stating NO it did not meet their needs, the comments provided appear to restate that mound or traditional graves would meet their needs.

Respondents were invited to add comments if they answered **NOT APPLICABLE** or **NO** to the question. By the nature of the question, neutral or negative comments were expected.

86 respondents left comments. Additional information shows the comments split by religion/non religion:

Christian:
<ul style="list-style-type: none"> • 30 (approx.) comments state cremation as the preferred choice. • 2 comments referred to the lack of a natural burial option
Muslim:
<ul style="list-style-type: none"> • 19 comments referred to the need for a choice of either mounded* or traditional graves. 11 of these specifically requested mounded graves. • 5 comments specifically mentioned traditional graves only • 4 comments specifically mentioned a Vault grave option. ** • 3 comments stated lawn graves were not acceptable but did not state a preference. • 9 comments referred to the need for services which meets the religious needs but did not state a specific requirement such as mounded or vault grave. • 4 comments stated a Muslim area only is required *** • 1 respondent requested a Muslim cemetery
Buddhist:
No comments
No Religion:
<ul style="list-style-type: none"> • 2 comments - Burials are not sustainable. Land should be used for economic development not burials. • 3 comments - Cremation / Not decided / no natural option

* Mounded graves are proposed as the new grave type

** Vault graves are available; however, they cannot be built individually on request.

*** There is a Muslim section in the area known as Westfield.

WE ASKED: Does the change to adjacent plots impact your decision to use Henley Road Cemetery for your burial or the burial of a loved one?

Option	Total	Percent
No	137	54
Not Applicable	71	28
Yes	29	11
Total	237	
Not Answered	18	7

Respondents were invited to add comments if they answered **YES** to the question. By the nature of the question, negative comments were expected.

29 respondents left comments:

- 8 comments were relevant to the question.
- 2 comments stated adjacent plots had already been purchased and the family would wish to keep them*
- 5 comments stated an adjacent plot would be preferable
- 1 comment stated adjacent graves were required.

*Any plots which have previously been reserved will remain so. The change applies to new requests only.

WE ASKED: Please provide any other information about grave types to help inform our proposals

64 respondents chose to provide additional comments. 26 of which were not relevant to the question as the majority referred to cremations.

The key messages are:

- 9 comments stated mounded graves were required
- 9 comments stated mounded or traditional & vaults were required
- 5 comments specifically stated traditional graves only
- 2 comments stated segregation between all faith groups should be in place
- 2 comments referred to a natural burial option

SECTION 3 Opening Hours

It is proposed that the hours of opening will be extended to include Saturdays all year round and a late-night opening on a Thursday evening in the summer months. This will provide customers with the option of a Saturday service and access to the office staff during these additional hours.

A table showing the proposed opening times for both grounds and office was included in the Rules & Regulations provided in the consultation web link. The report provided to the Policy Committee in June 2021 highlighting the key changes was also available.

WE ASKED: Do the revised opening hours offer a flexible service?

Option	Total	Percent %
Yes	200	78
No	34	13
Not applicable	14	5
Total	248	
Not Answered	7	3

Additional scrutiny of the data shows the split of the answers by religion:

Option	Yes		Not Applicable		No		Not Answered	
	Total	Percent %	Total	Percent %	Total	Percent %	Total	Percent %
Christian	93	94	3	3	1	1	2	2
No Religion	43	88	4	8	1	2	1	2
Muslim	40	53	4	5	29	39	2	3

Prefer not to say	6	38	5	31	4	25	1	6
Other	5	100						
Buddhist	1	50	1	50				
Total	188		17		35		6	

Whilst the majority of Christian or those with non-religion stated the opening times met their requirements ((94% and 88% respectively), there was a significant minority (39%) of those specifying they were Muslim that stated the opening times did not meet their requirements.

Respondents were invited to explain if they answered **NOT APPLICABLE** or **NO** to the question. By the nature of the question, neutral or negative comments were expected.

51 respondents left comments however 11 responses did not correspond to the question.

Some responses indicated a possible misunderstanding between the proposed opening hours for the office/services v the grounds. For example: *'We require access to visit during weekends'* would indicate the respondent has taken the closing of the office on a Sunday to mean the grounds are also closed.

Due to the above, it is not possible to provide a definitive indication of how many respondents are requesting the office and related services to be available all weekend and on bank holidays. However, based on the split by religion below and response to previous questions, we can assume at least 24 of the respondents do require different opening hours.

Christian: 1 Comment
<ul style="list-style-type: none"> Prefer to keep the late opening on all weeknights. Thought it was open all Saturday anyway?
No Religion:
<ul style="list-style-type: none"> 1 comment was made but it did not relate to the question.
Muslim: 24 Comments
<ul style="list-style-type: none"> 9 respondents stated services should be available on a Sunday. 12 comments stated services should be available on a Sunday & Bank Holidays 2 comments did not indicate a preference
Prefer Not to Say:
<ul style="list-style-type: none"> Please provide services over the weekend and bank holidays
Other:
<ul style="list-style-type: none"> No Comments
Buddhist:
<ul style="list-style-type: none"> 1 respondent stated opening hours should be all weekend as this is when people are free from work

WE ASKED: Do these revised hours provide you with more access to the services you require?

Option	Total	Percent %
Yes	193	76
No	30	12
Not applicable	25	10
Total	248	
Not Answered	7	3

Additional scrutiny of the data shows the split of the answers by religion:

Option	Yes		Not Applicable		No		Not Answered	
	Total	Percent %	Total	Percent %	Total	Percent %	Total	Percent %
Christian	85	86	9	9	4	4	1	1
Muslim	46	61	5	7	22	29	2	3
No Religion	38	78	8	16	1	2	2	4
Prefer not to say	12	75	1	6	2	13	1	6
Other	5	100						
Buddhist	2	100						
Total	188		23		29		6	

Respondents were invited to explain if they answered **NOT APPLICABLE** or **NO** to the question. By the nature of the question, neutral or negative comments were expected.

49 respondents left comments, 31 of the comments predominantly related to the **NOT APPLICABLE** section or did not relate to the question.

The majority of the remaining comments were repeats of the comments given in response to the previous question. There were 3 new comments, and these are shown below:

Muslim: 16 Comments in total - 3 new comments

- The Community should be allowed certain individuals to undertake burials instead of staff to reduce cost*
- The proposed hours are an improvement
- The longer Thursday evening in the summer and Saturday all year around is excellent.

*This is not legally permitted.

SECTION 4 - Accessibility

It is proposed that for all NEW areas of the cemetery, more space will be provided at the foot of grave plots to allow better wheelchair and pushchair access. The pathways will still remain as grassed walkways.

Making this change will marginally reduce the amount of land available for burials across the site.

The details regarding accessibility changes were provided within the report provided to the Policy Committee in June 2021. This report was available within the consultation web link.

WE ASKED: *Would you find this change beneficial?*

Option	Total	Percent %
Yes	179	70
Not applicable	38	15
No	32	13
Total	249	
Not Answered	6	2

Respondents were invited to add comments if they answered **NO** or **Not Applicable** to the question. By the nature of the question, neutral or negative comments were expected, however several positive comments were also received.

Related comments: 56 additional comments were made.

The split between positive/neutral and negative was evenly split. Although it was not possible to identify if the comments received were made by respondents who specifically had accessible challenges, some of the key messages are shown below:

Positive:

Several comments confirming the existing provision was adequate - for example:

- My family can access the current walkways with both wheelchairs and baby buggies.
- Seating on benches close to graves is adequate.
- Family members in wheelchairs can visit family buried
- I find the current access to my parents grave suitable for my requirements
- I believe there is good accessibility, and this should not be at the expense of reduced capacity.
- Plenty of room for wheelchairs anyway

Additional comments supporting the change included:

- Obviously for people in wheelchairs this is good.
- I will be taking my new baby boy to visit his older brother's plot, so pram access is useful.
- I believe it makes sense in current environment
- Although not disabled myself I think the proposal is a good one although I wonder if the walkways remaining as grassed areas will facilitate easy access for wheelchair users and those with pushchairs.
- I think any improvement in accessibility would be welcome
- I think it is a good idea.

Neutral

16 comments confirmed the change would not impact them or their family. For example:

- I do not use a wheelchair
- I don't have anyone in my family that uses either a wheelchair or pushchair.
- Nobody in my family is disabled so this would not affect us

Negative

Several of the negative comments referred to the proposal taking up more land and therefore reducing valuable burial space. For example:

- Space is at a premium - is there another way around this? But obviously we need to consider these needs Is the current space not enough for access?
- It is more important to leave as much space as possible for burials, as land is at a premium around Reading Centre. When a different area of land has to be used in the future, it will probably be on the outskirts of town and more difficult for some residents to access easily.
- Too much space been made for the foot of the Graves will mean less land for grave plots. Which in turn means there's a much lesser chance of having your loved ones buried next to each other.
- The main concern is soft ground for manually pushed wheelchairs rather than restricted space.

Other comments generally highlighted the misconception that the concrete plinths between rows of graves are paths. For example:

- There is paved access in my parent's plot, but it no longer has wheelchair access after you moved the headstones to the path. The headstones belong on the plot not on the path

WE ASKED: Please provide details of any additional improvements you would like to see to improve accessibility

Respondents were provided the opportunity to give additional feedback and comments. By the nature of the question, a mixture of positive, neutral and negative comments was expected.

21 responses did not correspond to the question, as most referred to opening hours as opposed to the physical accessibility requirements. These comments have not been considered against this question but have been considered in the section dedicated to opening hours.

Relevant key messages are:

- 2 respondents made a request for dropped kerbs at the roadside as not all wheelchair users can manage kerbs, and some power chairs cannot get up them at all.
- 1 respondent proposed extending the current Henley Road bus service so it would drop/pick up inside the cemetery - useful for people who do not have access to their own transport and elderly or disabled people who may find it difficult to walk to/from the existing bus stops.
- Electric assisted doors (into the cemetery office) for wheelchairs

Section 5 GENERAL FEEDBACK

In addition to the questions which focused on the 4 key areas, more research-based questions were included which will assist with the ongoing development of the service provision in general.

The questions were categorised as follows:

- 1) Your Experience
- 2) Your Choices
- 3) Additional Services

WE ASKED: General feedback about your experience - Do you have a family member or friend buried at any of the Council-run cemeteries?

Option	Total	Percent %
Yes	210	82
No	36	14
Don't know	7	3
Total	253	
Not Answered	2	1

Respondents were requested to state which cemetery if they answered YES to the above question.

Option	Total	Percent %
Henley Road Cemetery & Crematorium	192	75
Reading Cemetery	26	10
Caversham Cemetery	26	10
Don't know	9	4
Total	219	
Not Answered	36	14

WE ASKED: *Thinking about the cemetery your family or friend is buried in, can you please provide feedback about your experience of using the cemetery. Consider the cemetery grounds, staff or the burial process.*

187 responses were received:

- 11 responses did not relate to the question
- 98 comments were positive about the staff/service provision and grounds

- 27 comments were neutral or negative about the staff/service provision
- 24 comments were neutral or negative about the grounds
- 3 comments referenced the need for better chapel facilities due to size, décor and accessibility for people with disabilities.
- 2 comments relate to fees & expense.

By the nature of the question, a mixture of positive, neutral and negative comments was expected. Example of key comments are:

Staff & service provision

Positive

- I have found the burial service to be excellent.
- Overall, very helpful. Staff were lovely and helpful during the difficult times. Everything was organised very promptly and efficiently to ensure our wishes were met.
- Staff are always helpful and polite
- Staff in the office have been helpful and considerate
- I could not fault the staff one little bit. They are all kind and considerate and compassionate.
- Good experiences so far
- The building that houses the memory book and flowers is lovely as is the hall where the services are held. I know there are areas where it needs improvement being old etc. But am glad my visits are pleasant.
- My family have memorial plaques in place at this Henley Road Cemetery. I visit several times a year and enjoy the beautiful surrounding area and sense of peace.

Negative

- Found the cemetery staff so rude and unhelpful. Only wanted to find out a grave number and location painful experience and gave up in the end
- Found the rigmarole around adding my mother's ashes to her parents' grave site bewildering. First clarifying ownership, then getting permission to add memorial to headstone. Worst disappointment was learning we could not have a private (4 family members, one of whom was a lay preacher to say prayers) assembly as ashes interred but official had to be present. Whole thing put us off the plan completely.
- Following the death of my mother, the transfer of ownership of my parent's grave to me and my sister was hard to arrange
- I would have appreciated spreading ashes myself rather than the member of staff just walking to the area and doing this. Families need to be involved.

Grounds

Positive:

- The grounds are peaceful, well maintained and easily accessible.
- Access and parking are good. Grounds and paths good. A peaceful place.
- Very good kept very well.
- I would just like to praise you for putting in extra water taps and watering cans that has made such a difference
- My son is buried in the Baby Garden. I've never had any issues with using the cemetery grounds and have always felt treated with respect.
- Very pleased with everything. A beautiful area well looked after. Always a pleasure to visit our grave.
- Reading cemetery is an ideal cemetery. I like it as it is. All Hallows Road is a mixture.

Negative

- Lack of grass cutting is a common theme for example: Grass cutting seems a thing of the past. I visit my parent's plot every fortnight and have to take a strimmer to tidy up.
- Always looks good from a distance, but on closer encounters it becomes plain that more work could be done to keep plants etc looking nicer
- Reading Cemetery - access to cars limited, concerned that the sale of the gatehouse will further reduce access.
- The concrete paths* have some headstones on and some not looks a right mess also no consideration for the disabled to travel on the paths
- The roads can be potholed and uneven.
- There are a lot of tilting headstones tied up with string etc.

Memorials / Memorabilia

- More authority given to staff to remove unsightly items from graves and memorials e.g
 - Too many really old clearly dead flowers in vases, deflated balloons in trees, cards, etc all around the place - I would like to be written in any updated regulations is that items that are clearly dead or an eyesore can and will be removed by staff please.
 - My only complaint is the state of the grounds to be honest. The abundance of artificial floral tributes and photos that keep over spilling to the rest of the Mayfield plot on windy days
 - People should not hang things in the trees too.....they are trees not Christmas trees!
 - But often looks tatty and tacky with faded fake/silk flowers and faded Christmas decorations in July

Suggestions

- I have mobility issues that are helped by the disabled parking however the seating arrangements in the service rooms are unsuitable for those that struggle to get up and down from pews/benches. Dedicated seating, with arms to help people rise would be a great help
- We need a bigger chapel It is appalling that a near-city cannot cope with large services where attendees currently have to stand outside

Fees

- Admin fees and costs for transferal of grave ownership were quite high for what appeared to amount to a relatively trivial amount of paperwork.
- Costs should be more transparent
- Fees are too expensive
- Expensive. I have to pay for a permit to carry out any remedial work to the memorial.

Behaviour of visitors

- The feedback included 2 complaints regarding the behaviour of other visitors to the cemetery, stating it was unacceptable and distressing. The behaviour includes driving on the grass, being rude to other visitors, playing loud music, having BBQ's and allowing children to play around and on other memorials. Visitors leave the cemetery when these people are present.

*The 'paths' are not paths; they are plinths on which the memorial stones are securely placed.

WE ASKED: General feedback and comments about your choices Have you or your family considered where you or they want to be laid to rest when you or they die?

237 responses were received in respect of 'consideration by You'

Option	Total	Percent %
Yes	151	59
No	86	34
Total	237	
Not Answered	18	7

216 responses were received in respect of 'consideration by your family'

Option	Total	Percent %
Yes	118	46
No	98	38
Total	216	
Not Answered	39	15

WE ASKED: Have you or your family chosen a burial?

236 responses were received in respect of 'consideration by You'

Option	Total	Percent %
No	151	59
Yes	77	30
Not Applicable	8	3
Total	236	
Not Answered	19	7.45

214 responses were received in respect of 'consideration by your family'

Option	Total	Percent %
No	125	49
Yes	73	29
Not Applicable	16	6
Total	214	
Not Answered	41	16

WE ASKED: Have you or your family chosen a cremation?

235 responses were received in respect of 'consideration by You'

Option	Total	Percent %
No	118	46
Yes	105	41
Not Applicable	12	5
Total	235	
Not Answered	20	8

214 responses were received in respect of 'consideration by your family'

Option	Total	Percent %
No	117	46
Yes	77	30
Not Applicable	20	8
Total	214	
Not Answered	41	16

WE ASKED: Have you or your family considered Henley Road Cemetery / Reading Crematorium?

232 responses were received in respect of 'consideration by You'

Option	Total	Percent %
Yes	154	60
No	53	21
Not Applicable	25	10
Total	232	
Not Answered	23	9

218 responses were received in respect of ‘consideration by your family’

Option	Total	Percent %
Yes	131	51
No	60	24
Not Applicable	27	11
Total	218	
Not Answered	37	15

WE ASKED: Feedback and comments on additional services

The consultation provided a good opportunity for the Council to identify customer appetite for additional services. These services fell into 4 categories:

- **Community Presentations on:**

- What to do when someone dies

Option	Total	Percent %
Yes	197	77
No	51	20
Total	248	
Not Answered	7	3

- The process of arranging a funeral without a funeral director

Option	Total	Percent %
Yes	186	73
No	61	24
Total	247	
Not Answered	8	3

- **Informal community sessions:**

Opportunity where people can get together to have an informal, open conversation about death and bereavement, to raise awareness of death and help people prepare?

Option	Total	Percent %
Yes	158	62
No	86	34
Total	244	
Not Answered	11	4

- **Additional memorial options**

Memorial options - Memorial bird, butterfly or insect boxes

Option	Total	Percent %
No	129	51
Yes	100	39
Total	229	
Not Answered	26	10

Memorial options - Memorial wall where plaques can be displayed.

Option	Total	Percent %
Yes	145	57
No	89	35
Total	234	
Not Answered	21	8

Memorial options - Memorial key rings

Option	Total	Percent %
No	188	74
Yes	35	14
Total	223	
Not Answered	32	13

Some additional ideas provided by customers include:

- Memorial trees
- Water feature
- More baby options - e.g small cast teddy bears to place in the area or acceptable stones provided so siblings can paint a memorial for their baby brother or sister buried in the area.
- Annual Memorial Service
- Online obituary memorial site - a place where no physical memorial is needed
- **Grave maintenance / care packages**
An annual fee to have your loved one's grave maintained by the cemetery grounds team.

Option	Total	Percent %
No	124	49
Yes	119	47
Total	243	
Not Answered	12	5

Respondents were requested to provide an indication of how much they would be prepared to spend - as an annual fee for this service.

114 responses were received - 29 respondents did not indicate a figure but 25 supported the idea.

Amount £	Total Respondents
5 - 49	23
50 - 100	47
101 - 300	11
Over 300	4

MUSLIM COMMUNITY MEETINGS

In March 2021, two meetings were held to discuss burials for the Muslim Community. One meeting was attended by the Mosque representatives and representatives from the Pakistani Community Committee (PCC). The other by circa 70 members of the wider Muslim Community.

When the formal public consultation was launched, a further two meetings were arranged. The first meeting was held on July 22nd and was attended by representatives from the Mosques and

representatives from the Pakistani Community Committee (PCC). Invitations to the second meeting were issued to all those members of the wider community who had previously attended the meeting in March. This meeting was held on July 28th and approximately 14 people attended, in addition to the RBC team and attending Councillors

At both meetings, a progress update was given on the more general improvements being introduced following the initial sessions with the same groups in March 2021. A presentation was also given highlighting the 4 key areas of the consultation and the changes proposed.

Attendees from both meetings, thanked the Officers for the work being done to engage with the community. The commitment to strengthening the relationship was acknowledged and welcomed.

It was confirmed to the attendees that all comments or feedback would be taken on board and considered as part of the consultation. Any subsequent feedback in email form following the meetings has also been considered.

Attendees at both meetings confirmed they would also be completing the online consultation. The output from the meetings replicates the points raised in the public consultations:

- Grave types
 - Mounded graves are welcomed, but traditional graves in the dedicated Muslim area should still be an option.
 - Vault graves are required
- Opening hours
 - There were concerns that removing on call would be a significant backward step, as this meant the communities could not access services on Sundays or bank holidays. Therefore a 7 day a week service was preferred.

Some additional queries were raised in the meetings, but these were general operational queries, and these have been responded to individually.

As we cannot quantify the output from the meetings, we will take the additional input into account when considering the statistical data provided by the online consultation.

This summary is designed to provide the output from the consultation only. The conclusions drawn from these results are summarised in the Policy Committee report.

This page is intentionally left blank

Equality Impact Assessment (EIA)

For advice on this document please contact Clare Muir on 72119 or email Claire.Muir@reading.gov.uk.

Please contact the Project Management Office at pmo@reading.gov.uk for advice and/or support to complete this form from a project perspective.

Name of proposal/activity/policy to be assessed:
New Cemetery Regulations & Burial Provision at Henley Road Cemetery

Directorate: **Resources - Corporate Improvement & Customer Services**

Service: **Registration & Bereavement Services**

Name: **Diane Willshire**

Job Title: **Registration & Bereavement Services Manager**

Date of assessment: **May 2021 - Updated September 2021**

Version History

Version	Reason	Author	Date	Approved By
V1	Policy Committee	Di Willshire	25/5/2021	Isabel Edgar Briancon
V2	Policy Committee - Post Public Consultation	Di Willshire	25/08/2021	Isabel Edgar
V3	Policy Committee - Post Public Consultation	Di Willshire	10/09/2021	Isabel Edgar

Scope your proposal.

- **What is the aim of your policy or new service/what changes are you proposing?**

A full review of the provision being offered by the Service is underway with the aim of being able to enhance the Bereavement service offering currently available and meet more of the needs of our diverse community.

The review includes:

- 1) The Cemetery Rules and Regulations
 - 2) The grave types / memorial options available
 - 3) Opening hours and resources
 - 4) Accessibility
-

- **Who will benefit from this proposal and how?**

It is intended all residents of Reading Borough and their families could benefit from the changes. The enhancements will allow the Service to satisfy the wider needs of the culturally diverse community, especially in relation to the requirements based on religious belief or physical ability.

- **What outcomes does the change aim to achieve and for whom?**

1) The Cemetery Rules and Regulations

The Cemetery & Crematorium Rules and Regulations are being updated to ensure clearer definitions and instructions are provided, and commitment to transparency of our operations at the cemetery to allow better understanding of the Service by our users.

The Public Consultation results show the changes were positively received by the majority of respondents.

2) A wider choice of grave types.

Currently the Cemetery offers the following Grave Types for the burial of a coffin: Traditional Graves (Memorial Stone with Kerb Set) & Lawn graves (Upright Memorial stone only).

The Muslim community makes up around 7% (2011 Census) of our overall community in Reading, but over 17% of customers requesting burials. This Community have specifically approached us about the limitations of our current offer.

The change will see the introduction of a new grave type, to offer our customers better choice and specifically respond to Muslim faith burials.

Muslim Burials: The Muslim faith requires that no person nor machine, should be able to walk, ride or drive over the grave of a loved one. Due to the maintenance methods of a Lawn Grave, this cannot currently be observed. The Muslim community do have

access to a Traditional Grave, however this would be in the non / multi-faith section known as Mayfield, and this is not acceptable to the Community.

The additional grave option does potentially impact on the projected operations and lifespan of the burial ground. These will be reflected in the covering report for Policy Committee to consider.

Balancing the faith needs of this community along with the ongoing operating and longevity of the site must be considered. Therefore, best practice has been researched relating specifically to Muslim burials, and options such as Traditional or Mounded graves would meet the requirements of a Muslim burial.

Throughout the site, there are different sections for different grave types, and since the early 1980's, sections have been set aside specifically for Muslim burials.

Non-Muslim Burials: There is only one remaining Traditional grave area in the cemetery (Mayfield). Once this section is full, unless the Council have secured additional burial ground elsewhere, there will be no further provision for Traditional graves. This will impact on all faiths & non-faiths (except the Muslim Community) who use the Cemetery, but particularly the Black Caribbean and Traveller Communities.

Updated Post Public Consultation August 2021

Although the new mounded grave option fully meets the needs of the faith, and the results from the consultation found 58% of the Muslim community who responded stated the grave types available were either acceptable or did not apply to them, 36% of respondents stated the grave types were not acceptable. Upon further scrutiny of the data, these respondents had stated both mounded or traditional were acceptable, with only 5 individual respondents specifically stating traditional graves were the only grave type acceptable to them.

Upon further consideration, traditional graves will be permitted within a designated area of the Muslim section - i.e., mounded & traditional graves will be placed together.

These changes will impact on the layout and operations of the cemetery. These will be reflected in the covering report for Policy Committee to consider.

3) Enhanced operating hours and opening times:

The addition of Saturday opening hours both for the Cemetery Office and burial/cremation services plus a late night on a Thursday in the summer season, provides more accessibility to the services for the Community as a whole.

Saturday opening also provides the additional benefit for Muslim families:

- Families will be able to book a Saturday burial in the event a loved one should die on a Friday*. Currently, where a death occurs on a Friday, the earliest burial that can pre-booked is a Monday.
- Families can arrange a same day burial (subject to all legal documentation being available before 11.30am) The last burial of the day on a Saturday is 2.15pm.
- Families can pre-book a burial for Monday, up to 4pm on a Saturday, in the event a loved one should die after the time a same day burial is not possible.

This removes the need for the current weekend ‘Out of Hours/On-Call Service’ (provided voluntarily by staff). This also means two members of staff would already be on site to manage a burial, removing the need for a mosque licensee to be present. This would be beneficial to the mosques, as it removes the need for them to purchase specialist training and insurance.

The changes removal of the On-Call service would mean burials are no longer available on a Sunday. However, this would have limited impact. On average, the On Call service is used 3 times per annum. No ‘On-Call’ requests have been received, to date, this year.

*It should be noted, with the introduction of Saturday opening hours, any faith family may pre-book a Saturday burial in advance should they wish, however this is unlikely, as very few Funeral Directors work on a Saturday. This will therefore not impact on the particular benefit to the Muslim Community for the reasons stated above.

Updated Post Public Consultation August 2021:

As a result of the Public Consultation, an on-call facility for Muslim burials will now be provided on Bank Holidays except for Christmas Day, Boxing Day, New Year’s Day and Good Friday. No burials can take place on a Sunday.

4) Improved accessibility:

There are accessibility challenges throughout the site, and changes to operating practices (such as allowing Traditional graves in Lawn grave areas) may impact on the overall accessibility of the site. For example, blocking pathways for wheelchairs.

In older areas of the cemetery, it is not practical or feasible to introduce defined pathways due to the positioning of existing graves, however in all new areas of the cemetery, provision will be made to ensure grassed pathways are easily accessible.

The impact of this, is a likely reduction in the longevity of available burial space.

All new burial areas will allow a 900mm grassed pathway between rows to allow greater accessibility for wheelchairs and pushchairs.

- **Who are the main stakeholders and what do they want?**

Under the Local Authorities' Cemeteries Order 1977 (LACO) legislation, Local Authorities are required to prepare and adopt Cemetery Regulations that set out the Council's policy and procedures for the operation of the cemetery. The last time the cemetery regulations were updated and adopted by the Council was in 2011. The Regulation's apply to Henley Road Cemetery, Reading Cemetery and Caversham Cemetery only. They also apply to Reading Crematorium and Gardens of Remembrance based at Henley Road Cemetery.

In October 2020 the Council received representation from some members of the Muslim community who had loved ones recently buried at Henley Road Cemetery, stating the services being provided did not fully meet their needs in respect of burial options and satisfying their religious beliefs.

The Service committed to review the current Cemetery Regulations and consult on the proposals. Although the review has been prompted by the Muslim Community, the changes will benefit all residents of Reading Borough and their families.

Assess whether an EqlA is Relevant.

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

- **Do you have evidence or reason to believe that some (racial, disability, sex, gender, sexuality, age and religious belief) groups may be affected differently than others? Make reference to the known demographic profile of the service user group, your monitoring information, research, national data/reports etc.**

Yes / No (delete as appropriate)

The improved opening times and accessibility changes are intended to improve the service for all users of the Service. The introduction of Saturday opening will better meet the needs of the Sikh & Hindu communities, as research shows Saturday is their preferred day for cremation services.

The grave changes have been considered specifically to meet the needs of the Muslim Community.

The Muslim community make up around 7% of the population of Reading, however they represent around 17% of all burials undertaken.

Most users of the burial service are multi-faith/non-faith but burials are the preferred choice of Black Caribbean, Gypsy/Traveller and Muslims communities.

-
- **Is there already public concern about potentially discriminatory practices/impact or could there be? Make reference to your complaints, consultation, feedback, media reports locally/nationally.**

Yes / No (delete as appropriate)

Prior to the review taking place, the Muslim community initiated a petition against Lawn graves which was posted on the internet. It attracted worldwide interest and several million signatures. It was however impossible to identify how many signatures were from Reading Borough residents.

The BBC and the Reading Chronicle also ran a small piece on the topic, but no follow up.

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

An Equality Impact Assessment is not relevant because:

X

X

Completing Officer

Lead Officer

Assess the Impact of the Proposal

Your assessment must include:

- **Consultation**
- **Collection and Assessment of Data**
- **Judgement about whether the impact is negative or positive**

Think about who does and doesn't use the service? Is the take up representative of the community? What do different minority groups think? (You might think your policy, project or service is accessible and addressing the needs of these groups but asking them might give you a totally different view). Does it really meet their varied needs? Are some groups less likely to get a good service?

How do your proposals relate to other services - will your proposals have knock on effects on other services elsewhere? Are there proposals being made for other services that relate to yours and could lead to a cumulative impact?

Example: A local authority takes separate decisions to limit the eligibility criteria for community care services; increase charges for respite services; scale back its accessible housing programme; and cut concessionary travel.

Each separate decision may have a significant effect on the lives of disabled residents, and the cumulative impact of these decisions may be considerable.

This combined impact would not be apparent if decisions are considered in isolation.

Consultation

How have you consulted with or do you plan to consult with relevant groups and experts. If you haven't already completed a Consultation form, do it now. The checklist helps you make sure you follow good consultation practice.

[Consultation manager form - Reading Borough Council Dash](#)

Relevant groups/experts	How were/will the views of these groups be obtained?	Date when contacted.
Institute of Cemetery & Crematorium Management (ICCM)	Conversation & email	October 2020
Mosque Leaders	Meeting	March 2021
Approx. 70 Muslim community members	Meeting (open session)	March 2021
Other Local Authority Bereavement services	Conversation & email	April / May 2021
Gardens of Peace (Privately owned Muslim Cemetery)	Conversation & email with the Director of the Cemetery. Visits to the Gardens of Peace are planned for June 2021	May 2021
The Consultation Groups will include but is not limited to: <ul style="list-style-type: none"> o Mosque Burials Working Group (set up specifically to represent the Muslim Community on these matters) o Alliance for Cohesion & Racial Equality (ACRE) o Religious & Faith Groups o Cultural Identity Groups o Access & Disabilities working Group o Bereavement Support Services o Existing Grave owners @ Henley Road (where possible) 	A formal consultation is to take place. Additional consultation will be promoted via the Council's social media, General Local Media and through our Voluntary and Community Groups. Notices will also be placed within the Cemetery grounds and office. Updated Post Consultation: 2 presentations were also given to the Muslim Community, including representatives from the Pakistani Community. This was offered to other BAME groups but not taken up.	A period of 45 days commencing end June 2021 Updated: Post Consultation Public Consultation 28/06/21 - 12/08/21

Collect and Assess your Data

Using information from Census, residents survey data, service monitoring data, satisfaction or complaints, feedback, consultation, research, your knowledge and the knowledge of people in your team, staff groups etc. describe how the proposal could impact on each group. Include both positive and negative impacts.

(Please delete relevant ticks)

- Describe how this proposal could impact on racial groups.
- Is there a negative impact? Yes & No / ~~Not sure~~

Updated assessment post Public Consultation:

The changes are intended to improve the service offering for all users, regardless of race or ethnic origin.

The changes could improve the service for the Sikh and Hindu communities as we will be able to provide cremation services on a Saturday.

The changes have a positive impact for the Muslim Community as we look to offer a new grave type specifically to meet the needs of their faith. As Traditional Graves will also be permitted in the Westfield area, both faith and cultural needs will be met.

In order to ensure the lifespan of the cemetery is prolonged as much as possible, it will no longer be possible for families to purchase the lease/reserve adjacent plots. This practice was stopped for Muslim burials in 2015/2016 as space in the dedicated area was scarce.

Although this will impact on all users of the cemetery, the number of requests over the last 5 years is minimal compared to overall burial numbers. The Communities potentially impacted the most, will be the Black Caribbean and Traveller communities.

Families will still be able to bury loved ones together in a double-depth grave. This is detailed in the covering report for the Policy Committee.

The consultation results also showed the impact of this change to be negligible.

- Describe how this proposal could impact on Sex and Gender identity (include pregnancy and maternity, marriage, gender re-assignment)
- Is there a negative impact? Yes / No / ~~Not sure~~

The services offered are available to all individuals regardless of their sex or gender identity as defined above.

- Describe how this proposal could impact on Disability
- Is there a negative impact? Yes / No / ~~Not sure~~

With the addition of grassed pathways to allow for the use of wheelchairs in the new burial grounds, the change has a positive impact for wheelchair users.

- Describe how this proposal could impact on Sexual orientation (cover civil partnership)
- Is there a negative impact? Yes / No / ~~Not sure~~

The services offered are available to all individuals regardless of their sexual orientation.

- Describe how this proposal could impact on age.
- Is there a negative impact? Yes / No / Not sure

The services offered are available to all individuals regardless of their age, except where restrictions are required by law or on the grounds of Health and Safety. For example, the Cemetery Regulations have been updated to specifically state no-one under the age of 18 years old is permitted to backfill a grave.

- Describe how this proposal could impact on religious belief.
- Is there a negative impact? Yes / No / Not sure

- The introduction of the Mounded grave option allows the Service to meet the faith needs of the Muslim Community.
- Changes to the burial options do not have any negative impact on the following groups: Sikh's, Hindu's, Buddhists & Mormons. Traditionally, these faiths choose cremations.
- The Black Caribbean and Traveller Communities generally choose the Traditional Grave Option. This can still be provided in the Multi Faith area of Mayfield.
- The Catholic Community generally choose burials, although in recent years, following a declaration by the Pope, the burial of cremated remains is also acceptable. Burials with both Lawn grave and Traditional grave options are available in Mayfield. Cremated remains graves are also available in a dedicated area of the cemetery.
- Jewish burials take place at dedicated cemeteries.

Make a Decision.

If the impact is negative, then you must consider whether you can legally justify it. If not, you must set out how you will reduce or eliminate the impact. If you are not sure what the impact will be you MUST assume that there could be a negative

impact. You may have to do further consultation or test out your proposal and monitor the impact before full implementation.

- **Negative impact identified but there is a justifiable reason.**

A negative impact has been identified with regards the removal of the option to purchase/reserve adjacent burial plots. The data shows the impact is expected to be minimal, given the number of requests over a 5 year period compared to the total burials in the same period. The output from the Public Consultation also supports the expectation of minimal impact.

This change is necessary in order to extend the lifespan of the cemetery, predominantly in the non & multi-faith traditional grave area. This restriction had already been introduced for Muslim burials in 2015/16 as space in the dedicated area was scarce. The change will align the restriction for all faiths and non-faiths.



Diane Willshire - Completing Officer

Isabel Edgar Briancon

Lead Officer

READING BOROUGH COUNCIL

REPORT OF DEPUTY CHIEF EXECUTIVE

TO:	POLICY COMMITTEE		
DATE:	23 SEPTEMBER 2021		
TITLE:	BURIAL LAND OPTIONS AND CONSIDERATIONS		
LEAD COUNCILLOR:	CLLR RUTH MCEWAN	PORTFOLIO:	CORPORATE AND CONSUMER SERVICES
SERVICE:	REGISTRATION & BEREAVEMENT SERVICES	WARDS:	BOROUGHWIDE
LEAD OFFICER:	ISABEL EDGAR	TEL:	0118 9373357
JOB TITLE:	ASSISTANT DIRECTOR OF CORPORATE IMPROVEMENT AND CUSTOMER SERVICES	E-MAIL:	Isabel.edgar@reading.gov.uk

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 To present the options and considerations for potential land acquisition for burials beyond 2024/5.
- 1.2 A new set of Cemetery and Crematorium Rules and Regulations have been drafted and consulted upon extensively. They are presented elsewhere on the agenda for consideration. Adoption of the rules and regulations has implications for the types of burial services the Bereavement Service will offer, as well as the longevity of the burial land at Henley Road Cemetery.
- 1.3 In June 2021 Policy Committee committed to review potential options to manage burials beyond the 5 years of burial space within Westfield and 3 years in Mayfield within Henley Road Cemetery.
- 1.4 Appendix 1 - Options for Burials within 20 miles of Reading.

2. RECOMMENDED ACTION

- 2.1 To note currently available burial options outside of the Borough available to Residents and customers within a 20-mile radius.
- 2.2 To agree that officers commission a comprehensive land options appraisal considering options 3, 4, 6, and 7 for the provision of burial land.

3. POLICY CONTEXT

3.1 Local Authorities providing new or maintaining closed cemeteries burial space are known as Burial Authorities. Burial authorities can either be public entities (e.g local authorities and town councils), or private entities (e.g., commercial organisations /Trusts) and can be either secular or non-secular. All burial authorities are required to operate within the legal framework of the Local Authority Cemetery Act 1977 and the Burial Act 1857. Church of England cemeteries (consecrated ground) have some small variations and allowances within the regulations.

3.2 Historically the national picture around provision of land for new burials was not well understood. However there have been a number of surveys and a consultation in the 2000's that have informed this report. In 2004 the Ministry of Justice undertook a burial ground survey to understand the burial land supply. In 2004 the Home Office consulted with Local authorities and the burials industry on a number of key legislative proposals to address existing burial land supply, perceived outdated legislation and impacts of the legislation on the burial industry (Burial Law and Policy in the 21st Century).

3.3 In 2007 the Home Office published their findings of the consultation and predominantly the status quo was maintained. Three of the key outcomes included:

- The agreement that Local Authorities would not be statutorily obliged to provide burial land. However, it recognised that where burial land was provided it need to be inclusive of all denominations and well managed, with a clear service offer.
- That existing legislation provided the correct levers to manage demand and ways of working. However new guidance would be issued for burial managers.
- That existing legislation provided for the re-use of graves in some circumstances.

3.4 The survey of burial grounds concluded that there would be a median remaining lifetime of 30 years (i.e., until 2035) for existing burial grounds if current levels of demand continue. Urban authorities are particularly impacted by a lack of burial ground. In London, the survey results indicate that there is already considerable pressure on the existing burial space. Only half of local authority burial grounds and fewer than a quarter of Church of England burial grounds were open to burials in new graves.

3.5 Reuse of burial ground

3.5.1 Due to the pressure on burial land supply the reuse of graves has been under consideration for some time as a means of addressing this problem. The general position is that buried human remains may not be disturbed without specific authority. In limited circumstances, London burial authorities already have power to disturb graves older than 75 years for the purpose of deepening the grave to allow further burials to take place.

- 3.5.2 During the 2004 consultation the Government proposed a “lift and deepen” method, which involves the exhumation of remains in an existing grave, digging the grave to a greater depth, re-interring the remains (in a fresh coffin, if necessary), and using the rest of the grave for fresh burials. The proposal to reuse graves had a mixed reception. Legislation remains unchanged and has been kept under review by successive governments.
- 3.5.3 Section 25 of the Burial Act 1857 makes it an offence to remove buried human remains without a licence from the Secretary of State or, in relation to ground consecrated according to the rites of the Church of England. Therefore, it is not currently lawful to use the lift and deepen method. There may be some circumstances however where re-use is lawful.
- 3.5.4 When a grave is purchased; this generally refers to the “exclusive right of burial” for that grave space and not to the purchase of the actual land. A burial authority may grant an exclusive right of burial, usually for a period not exceeding 100 years. RBC currently provide the exclusive right of burial for 75 years. The general effect of purchasing the exclusive right of burial is that no one may be buried in the grave without the owner’s permission for this 75-year period.
- 3.5.5 Rights may sometimes be ended by burial authorities, generally if they have not been exercised for 75 years and the relevant notice has been given.
- 3.5.6 Where the exclusive right to bury has not been used for 75 years or more, and there remains space within the grave (e.g the grave has been dug to double depth, however only one interment has taken place), City of London burial authorities have been granted authority to use the additional space and grant exclusive right of burial for a further 75 years to a new grave owner.
- 3.5.7 During the 2004 consultation while there was overall support for the reuse of graves within the industry, there was a large majority, predominantly the public, that were not in favour, and it was accepted that decisions around this strategy should remain local and extensively consulted upon.
- 3.5.8 If councils outside of the City of London are granted the power to re-use graves, there is an expectation the council will explore grave reuse. However, until an extensive investigation into each burial plot takes place, the number of years of additional burial capacity is yet unknown. The cost of undertaking reuse on an individual grave basis may also not represent value for money, as these costs could not be passed onto new grave owners.

4. THE PROPOSAL

4.1 Current Position:

4.2 Henley Cemetery

- 4.2.1 The Council operates 3 cemeteries and has adopted a further 5 closed churchyards. The new Rules and Regulations only apply to 3 cemeteries as these are under our full control. They also apply to the Reading Crematorium and Gardens of Remembrance based in Henley Road Cemetery.

- 4.2.2 In 2016 the Council approved a change of use of recreational land located within the Henley Cemetery boundaries to be converted to burial land to extend the longevity of the cemetery. Although the original land had been purchased for the purpose of burial land in 1924, since that time the land had been used as recreational ground. However, due to the lack of capacity at the Henley Road Cemetery, it was agreed on 2 November 2015 Policy Committee that this land would become the new area for burials.
- 4.2.3 The projected lifespan for burials at Henley Cemetery is 5 years within Westfield, and 3 years within Mayfield. This takes into account the new regulations and updated burial numbers. Second interments in existing graves can still take place throughout the rest of the cemetery where there is only one coffin/cremated remains within the grave.
- 4.2.4 Currently RBC offer burials to customers living outside of the Borough boundary. Over the past 3.5 years (Jan 2018 - Apr 2021) 112 out of 799 total burials related to out of area residents. Out of area burials incur additional charges, this is typical practice for Burial Authorities, and therefore Reading residents would incur additional charges should they wish to bury outside the Borough boundary.
- 4.2.5 There are circa 670 burial plots for cremated remains, with scope to increase this number considerably. It is estimated that there is capacity for over 40 years.

4.3 Alternative burial options for RBC Residents

- 4.3.1 It is estimated that there is around 15 years total burial space available across the Southeast. However, this varies significantly between local authority area.
- 4.3.2 In an APSE state of the market survey, it is estimated that 63% of local authorities are seeking to increase availability of cemetery land over the next 5 years. This is perhaps in some part a reflection of the increased need for burial space during the current Coronavirus pandemic. However, it is reflective of the decrease in burial land generally.
- 4.3.3 The way new land is being sought varies between local Authorities. Options include looking to purchase adjoining land to existing cemeteries; including future burial land provision in the Local Development Plan; looking to purchase land in neighbouring authorities; sharing or purchasing land with neighbouring authorities.
- 4.3.4 There are over 150 cemeteries in a 20-mile radius of Reading. Of these cemeteries, most are closed churchyards. The Institute of Cemeteries and Crematorium Management is currently developing a cemetery map to show local authority, faith and private burial land availability across England and Wales.
- 4.3.5 A short study has been undertaken with neighbouring authorities/councils on burial land and their plans around managing burials once their cemeteries close for new internments. We have only considered the primary local authority or parish council cemeteries, and where it's been possible to identify private cemeteries, we have included those. Please see Appendix 1.

4.3.6 In summary there are multiple options for residents to arrange for burials in neighbouring council run cemeteries or in private cemeteries, and both faith and non-faith would be able to be catered for. However, these options would incur significant costs for Reading residents, except for burial at private natural burial cemeteries, where costs are lower than most LA cemetery prices (including RBC's). Furthermore, travelling distances may be prohibitive for many families.

4.4 Land options adjacent to Henley Cemetery

4.4.1 There are limited opportunities to expand Henley Road Cemetery any further for full body burials. In 2015 three land options were considered: Caversham Park land (BBC land) to the rear of the cemetery, allotments land (originally purchased as burial ground) adjoining the cemetery and the recreation ground (now Westfield). At this time only the recreation ground was considered a viable option for expansion, although the report noted that the non-statutory allotment land should be retained for future consideration of burial ground.

4.5 Henley Road Allotments

4.5.1 This is currently non-statutory temporary allotments measuring 2.65 hectares in total. Of the 2.65 ha some 1.63ha is taken up by allotments with the remaining 1.02 ha comprising paths/access and wooded areas which are not suitable for allotments. 2.65 hectares would provide up to a further 14 years of burial ground, although this assumes that all wooded areas would be cleared to make way for burials.

4.5.2 Henley Road is the largest allotment provision in the Borough and the number of people on waiting lists far exceeds the amount of allotment space available. The table below shows allotments within the borough, occupancy and waiting list numbers.

Location	No. Allotments	Occupancy	Waiting List Nos.
Henley Road (Site C)	123	121 (98%)	192
Emmer Green	61	60 (99%)	186
Oakley Road	31	28 (98%)	185
Victoria Road	25	22 (90%)	142
Balmore	31	29 (94%)	181
Data accurate as of May 2021			

4.6 Caversham Park Land

4.6.1 Originally the options for acquiring this land were based on a land swap and this is no longer viable, due to temporary housing being sited on the piece of land the Council had intended to swap. However, there are currently no active planning applications within this site. Contact has been made with the developer on this site, however we have not received any further information about their plans.

4.6.2 The land is around 3.7 hectares and would provide an additional 15 - 18 years of burial space. In 2015 a ground investigation survey was carried out which concluded that the area of land surveyed as per the map below would not pose

any risk to groundwater or controlled waters, and therefore could potentially be used as burial ground.



Map showing land north of Henley Road Cemetery.

4.6.3 It is worth noting that Policy CA2 of the Local Plan (adopted November 2019) relates to Caversham Park and states:

4.6.4 Any development or conversion proposals should open as much of the park as possible up to public access, including reinstatement of any historic public footpaths where possible and appropriate. This policy does not allocate the site for additional development over and above conversion of the house.

4.6.5 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:

- No development will negatively affect the significance of heritage assets and their setting.
- Development will not detract from the character or appearance of the important landscape; and
- Development will not negatively affect significant trees or areas of biodiversity importance.

4.6.6 The policy protects the existing open space within the park which suggests that the southern boundary may be protected from development. However, this may not exclude the potential for burial land or natural burials, as these are regarded as Public Open space and is more likely to be seen to be in keeping with the landscape and continue to support the ecology and biodiversity of area. See section below for further information about natural burials

4.7 Natural Burial

- 4.7.1 Natural burial is a term used to describe the burial of human remains where the burial area creates habitat for wildlife or preserves existing habitats (woodland, species rich meadows, orchards, etc), or improves and creates new habitats which are rich in wildlife (flora and fauna). Where a funeral precedes such burial, it would typically seek to minimise environmental impact and people are buried in biodegradable coffins, without embalming chemicals, and without a memorial headstone. The sites are often in an unspoilt meadow, or part of establishing new woodland by the planting of memorial trees.
- 4.7.2 The cost of burials at private natural burial sites are like lawn grave costs, and do not tend to incur out of area charges. This is a commercial decision for these providers. Maintenance of these sites is significantly less than the traditional LA cemetery as the primary purpose is to keep the area wild. It should be noted however that the quality of such areas is still a vital element of the service provision rather than simply providing an area which receives little or no maintenance on the pretext that it is a 'natural area.'
- 4.7.3 There are around 250 natural burial sites in the UK. They are becoming increasingly popular and are seen as an environmentally friendly and sustainable way to manage burials. Frequently agricultural, pasture and arable land is converted to natural burial sites. Examples of nearby natural burial grounds can be seen at <http://www.naturaldeath.org.uk/>
- 4.7.4 Local authorities are increasingly adopting natural burial ground services as an alternative to traditional burial practices and recently an APSE survey noted that between 10 and 20% of customers are now indicating that natural burials are a preferred choice.
- 4.7.5 No further study of land availability has been undertaken at this stage. However, the sale of agricultural, arable or pastoral land is roughly £7,000 - £15,000 per acre in surrounding areas. Planning permission would need to be sought to change the use of the land and consideration for management, access, and buildings/facilities to enable funerals to happen effectively. Whilst funerals are likely to happen off site, many families opt to have the funeral at the graveside, this is particularly relevant for faith burials.
- 4.7.6 Typical Natural Burial Ground with Memorial Trees.



4.8 Faith Burials

- 4.8.1 While the vast majority of funerals handled by the Council are cremations, these are not suitable for everyone. Faith or cultural burial traditions often

require that only burials are an acceptable way to manage the deceased. These groups include Islamic, Catholic, Jewish, Gypsy and Traveller and Black and Caribbean burial traditions. As at the 2011 census, these faith or cultural groups make up around 9.5% of Reading's population. Anecdotal data indicates there is an increase in population representation in these groups across the borough, which will be confirmed by the 2021 census to be released in 2022.

4.8.2 The Council's Cemetery Rules and Regulations have been updated to reflect the wider requirements of our communities, and one of the core principles of the Charter for the Bereaved, is to increase the types of burials, cremations, and funerals available to the bereaved.

4.9 Land acquisition

4.9.1 Identifying, purchasing, securing planning, and implementing infrastructure for burial sites can take several years prior to receiving the first burial. This is a significant investment of resources, therefore identifying smaller parcels of land may be cost prohibitive due to set up and maintenance cost for individual sites.

4.9.2 As with previous land acquisition by the Council for burials, in 1924 a large area of 23 hectares was secured. This has allowed burials for around 100 years at Henley Cemetery. It should be noted that space requirements for graves has increased due to changes in legislations/health and safety, as well as the general increase in height and weight of the population.

4.9.3 Identifying parcels of land that provide in excess of 40 years will allow the council to increase the range of burials and grave types, whilst still maintaining a well laid out and peaceful environment for the bereaved. Larger parcels of land can be divided into sections for say natural burials and faith sections, as well as providing more opportunities around grave types.

4.9.4 Depending on the shape and layout of the site around 8-10 hectares would provide 40 years of burial space, a further 2-3 hectares would be needed to allow for access roads and paths.

4.9.5 There would be a number of minimum requirements for the suitability of the land including:

- Ecology surveys would be required to ensure that burials did not impact on the surrounding environment. For example, ground water levels would need to be deep enough to allow sufficient space between the grave and ground water level
- Access to the site from main roads and throughout the site
- Relatively level (no steep slopes) to allow for maximum number of burials

4.10 Options Appraisal

Option 1 - Cost neutral		Do Nothing	
Description	Strengths	Weakness	
<p>Burials for new interments would cease in around 8 years (2029)</p> <p>Second interments could continue for all existing cemetery users (40+ years)</p> <p>Interment of ashes to continue (40 + years)</p> <p>Primary service offer would be cremations.</p>	<p>No new costs associated with land acquisition, operating and maintenance.</p>	<p>No provision for faith burials. This particularly impacts BAME and gypsy and traveller communities where burial is preferred or often required.</p> <p>Costs to Reading Borough residents for burying out of area would see a 2 to 3 times increase in fees, unless choosing a private cemetery or natural burial</p>	
Option 2 - Cost £		Reuse of Burial Land	
Description	Strengths	Weakness	
<p>Both Reading Old and Henley Cemetery have potential reuse opportunities - once research is complete to establish capacity. Reuse described in section 3.5</p>	<p>Will provide additional years of potential space.</p> <p>Keeps burial provision within Reading Borough</p> <p>No additional or new maintenance costs for existing cemeteries</p>	<p>Unlikely to meet the needs of the Muslim and Gypsy Traveller Community as they tend to have double/treble depth. Black Caribbean communities will often use caskets which requires deeper graves.</p> <p>Would prevent family graves</p> <p>Negative perception by customers</p> <p>Operating costs increase per burial (due to exhumation and reinternment costs)</p> <p>Each grave would need to be investigated to see whether reuse would be viable.</p>	
Option 3 - Cost £££		Land Acquisition in Reading	
Description	Strengths	Weakness	
<p>Identify land within Reading Borough to purchase</p>	<p>Services remains local to Reading residents</p> <p>Customers would not incur out of area premium costs.</p>	<p>Land prices in Reading carry premium prices</p> <p>Any land availability will be competing with housing</p> <p>Smaller parcels of land will add to overall opex</p>	

		costs due to baseline infrastructure. Any area less than 1 hectare (5 years) is likely to be cost prohibitive in long term. No other suitable areas of land available (search carried out in Summer 2021)
Option 4 - Cost ££	Land acquisition within 10 miles of Reading	
Description	Strengths	Weakness
Purchase agricultural or pastureland within 10 miles of Borough Boundary.	<p>Burial services remain within a 30-minute travel time</p> <p>Land availability and larger plots easier to identify</p> <p>Lower cost per hectare</p> <p>Opportunity to increase service offer to provide natural burials, more faith sections, grave types</p> <p>No additional costs for RBC customer burying out of area</p> <p>Opportunity to provide burials to a wider customer base. Increase income.</p> <p>Land acquisition for maintaining burial ground as natural open space may be more attractive to LA's / Town Councils than housing land.</p> <p>Supports Councils ambition to secure green infrastructure.</p>	<p>Increase opex for maintenance and operations outside of area. To offset this, it would be proposed to purchase enough land to provide long term burial services (40 years +)</p> <p>Planning permission not guaranteed</p> <p>Competing with other local natural burial sites.</p> <p>Potential requirement to outsource grounds maintenance if using internal teams is not VFM due to the distance to the new cemetery</p>
Option 5 Cost ££	Shared existing burial land with neighbouring LA	
Description	Strengths	Weakness
Approach LA's with 30 years plus burial land availability	<p>Negotiate out of area burial costs to keep costs reduced for Reading Customers</p> <p>Infrastructure already in place</p> <p>Potential for this to be a short-term option.</p>	<p>No increase in burial capacity across wider area. Therefore, not addressing core issue.</p> <p>Other LA will be impacted by potential loss of income arising from out of area resident burials. RBC would need to offset 3rd Party losses</p> <p>Other LA impacted by reduction in burial</p>

		capacity for their residents. Income loss for RBC No overall control of service offer
Option 6 Cost ££	Shared land acquisition with neighbouring LA	
Description	Strengths	Weakness
Identify LA partner to commission land for both LA's to use.	Land availability potentially on boarder Shared CAPEX/OPEX costs with another LA Positive joint venture to increase burial land for both communities and increase capacity No RBC or other LA customers incurring out of area costs Potential to purchase larger plot	No overall control of service Requirement to align service across both LA's Appetite not tested and early no early indications that this would be favourable to LA's with significant land holdings already Loss of income from out of area burials using RBC sites.
Option 7 - Cost £ - £££	Extension of Burial Land at Henley Road Cemetery - Caversham Park Only	
Description	Strengths	Weakness
Explore options relating to Caversham Park Land	Boarders the cemetery so no major infrastructure would be needed to bring this site into operation Has the correct geology to allow burials to take place. Maintains service within Reading.	Caversham Park land likely to be expensive per hectare Unclear position regarding planning for Caversham Park. Site relatively small providing from 15 to 18 years capacity
Option 8 - Cost £	Extension of Burial Land at Henley Road Cemetery - Allotment Land Only	
Description	Strengths	Weakness
Explore options relating Allotment land	Allotment land already owned by RBC and originally purchased for the purpose of burial land. Maintains service within Reading. Boarders the cemetery so no major access issues and has the correct geology to allow burials to take place. Land is not statutory allotment land. No additional land acquisition costs to the council. Would become a significant income generating opportunity.	To bring site into use would result in woodland areas to be cleared to allow for burials. If woodland areas not cleared would only provide 5-6 years burial capacity. Loss of well used and oversubscribed allotment land would be unpopular with 200 users Nowhere identified to provide alternative allotment land

4.10.1 It is recommended that the council takes forward the following options concurrently: 3, 4, 6 and 7. This will provide the council with multiple avenues to explore and do further analysis to understand the best overall option to take forward. Therefore, the commissioned work will cover:

- Explore potential land options in the Borough
- Open discussions with Caversham Park developer
- Open discussions with neighbouring LA to acquire more land in partnership
- Identify land up to a 10-mile radius of Reading to provide 40 plus years of burial provision.

4.10.2 It is not proposed to explore option 8 at this time (turning the allotment land back into burial ground). However, this is an important land holding for the Council that was originally purchased for the purpose of burials. Therefore, consideration of using this land for burial provision in the future should be revisited if and when appropriate.

4.10.2 Is anticipated that the project can be initially led by RBC Service Teams in both Bereavement Services and the Property and Development Team, and it is suggested that the progress of the options appraisal is monitored through the Land, Property and Development Board, chaired by the Chief Executive.

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:

- Healthy Environment
- Thriving Communities
- Inclusive Economy

5.2 Healthy environment

5.2.1 Securing new land for burials, particularly if natural burials are an option, will contribute to both the Council tackling climate change and investing in green infrastructure.

5.3 Thriving Communities

5.3.1 Securing further burial land supports the Council's aim to be an inclusive society, regardless of cultural, social ethnic and religious background. Furthermore, the work undertaken through the service review and consultation has helped to build relationships with community groups that may have been marginalised by previous Council policy's relating to burials and cremations.

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

6.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers). There are no climate change or environmental impacts relating to commissioning a burial land survey, however the outcome of this

piece of work will be subject to an Environmental Impact assessment and will need to consider a broad range of environmental impacts including but not limited to:

- Ecology and geology surveys to determine the suitability of the site for burials and impacts to existing biodiversity within the site.
- Impacts of travel to the site by customers and the service.
- Potential to improve and increase biodiversity within an agricultural setting
- Potential to improve and increase woodland areas
- Potential to divert customers that may have opted for cremation to other/natural burials, which will have less associated carbon emissions.

7. COMMUNITY ENGAGEMENT AND INFORMATION

7.1 At this stage community consultation is not required, although depending on the recommendations of the commissioning work, a further consultation will be needed.

7.2 During the public consultation undertaken as part of the Proposed Cemetery Rules and Regulations we asked several questions about customers experience of the service. We asked customers whether they had made plans for when they or a family member died. 255 people responded saying that they had made plans. Of these 30% indicated that their preferred plan was burial, while 41% indicated cremation was their preferred option.

7.3 The survey also asked whether they had considered using Reading Crematorium or Henley Road Cemetery, 60% of respondents stated they wanted to use Reading Crematorium or Cemetery.

8. EQUALITY IMPACT ASSESSMENT

8.1 Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, 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 As part of the overall service design an equality impact assessment (EIA) was undertaken. The EIA specifically considers faith and cultural burial or cremation traditions.

8.3 The EIA has identified that not securing further burial land may adversely impact some protected groups because:

- Land available for Muslim faith burials is restricted to around 3 or 4 years in Reading.
- Although there is faith burial land within 20 miles of reading, it is likely that this will incur additional costs to those family burying out of area.

9. LEGAL IMPLICATIONS

9.1 None at this stage.

10. FINANCIAL IMPLICATIONS

10.1 The cost of land acquisition is unknown at this time as it would entirely depend on where, what type and how the land was acquired (e.g RBC alone or with a partner). However, the table illustrates some costs that the council is likely to incur as a result of increasing burial land capacity.

Item	Capital Cost
Agricultural Land acquisition (circa 12 hectares)	84,000 - 180,000
Land in Reading (potential cost per hectare)	£1,000,000
Set up Costs (planning, ecology surveys, access, paths, roads, facilities etc)	£100,000 - £250,000
Item	Revenue Cost
Maintenance	£30,000 - £60,000
Staffing	£30,000 - £60,000

Item	Revenue income
50 Burials per year at current lawn grave costs*	£95,000
100 Burials per year at current lawn grave costs*	£191,500

*Current Lawn Grave costs are made up of the exclusive right of burial £1075 and an internment fee £840. Total £1915.

11. BACKGROUND PAPERS

11.1

- Burial Law and Policy in the 21st Century:
https://www.iccm-uk.com/iccm/wp-content/uploads/2020/09/iccm_burial-law-policy-MoJ-2.pdf
- Guide for Burial Ground Managers (Department for Constitutional Affairs):
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/326370/burial-ground-managers.pdf
- House of Commons Briefing Paper - Reuse of grave June 2017:
<https://researchbriefings.files.parliament.uk/documents/SN04060/SN04060.pdf>
- MoJ Burial Ground Survey:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/217909/burial_grounds_web_pg1-14.pdf
- Cemeteries and Crematoria State of the Market 2021 (APSE)

11.2 Appendix 1

Location	Service	Info
Wokingham	Traditional	Longevity 18 years Out of area incur 3x standard charges
Earley Town Council	Lawn Graves Only, Muslim section (Earley Residents only)	Longevity unknown Out of area incur 3x and 4x standard charges depending on grave type
Abingdon	Lawn Graves only	Longevity unknown Out of area incur 3x standard charges
Bracknell Forest	Lawn, traditional Designated faith sections	18 months, but options for 40-year longevity due to land holding Out of area incur 3x standard charges
Newbury Town Council	Lawn Graves Only	Longevity unknown Out of area incur 3x standard charges
Thatcham Town Council	Lawn Graves only	Longevity unknown Out of area incur 3x standard charges
Oxford City Council	Lawn and traditional graves Designated faith sections	18 months but options for 50-year longevity due to land holding Out of area incur 3x standard charges
Slough	Lawn Graves Only Designated faith sections	Longevity unknown Out of area incur 2x standard charges. Weekend and Bank holiday incur 3x standard charges
Windsor and Maidenhead	Lawn and Traditional Designated faith areas	Longevity unknown Out of area incur 2x standard charges
Rotherfield Greys, Henley on Thames	Natural only	Longevity unknown No out of area additional charges
Hungerford, Berks	Natural only	Longevity unknown No out of area additional charges
Witney, Oxen	Natural only	Approx. 4 years based on 200 burials per year
Ipsen, Hampshire	Natural only	Approx. 2 years based on 200 burials per year

This page is intentionally left blank

READING BOROUGH COUNCIL

REPORT BY EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES

TO:	POLICY COMMITTEE		
DATE:	23 SEPTEMBER 2021		
TITLE:	AWARD OF CONTRACT - ACCOMMODATION WITH SUPPORT FOR YOUNG PEOPLE YMCA READING		
LEAD COUNCILLOR:	COUNCILLOR ELLIE EMBERSON	PORTFOLIO:	HOUSING
SERVICE:	HOUSING	WARDS:	BOROUGHWIDE
LEAD OFFICER:	VERENA HUTCHESON/BRYONY HALL	TEL:	0118 937 4136
JOB TITLE:	HOMELESSNESS AND HOUSING PATHWAYS MANAGER	E-MAIL:	<u>Verena.hutcheson@reading.gov.uk</u>

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 Reading Borough Council (RBC) currently commissions YMCA Reading to deliver a contract to the value of £318k to provide 40 units of accommodation to young people aged 16 - 25. This includes specific vulnerable groups including unaccompanied asylum seekers (UASC), homeless 16/17-year olds, Children Looked After (CLA) and those leaving care. Four units are dedicated to supporting young mothers and their babies. The current contract expires on 30th September 2021.
- 1.2 As part of a new commissioning exercise RBC and Brighter Futures for Children (BFfC) have undertaken a full needs analysis of the accommodation and support needs of those aged 16 - 25. This excludes those who require semi-independent living arrangements that are independently commissioned by BFfC. In light of this a review of the service provided by the incumbent provider, YMCA Reading has also been undertaken. The intention is for RBC and BFfC to jointly commission the contract with YMCA Reading.
- 1.3 Due to limited options for alternative accommodation provision RBC undertook without prejudice scoping and negotiations with YMCA Reading. Subsequently, a Contract Procedure Rules (CPR) waiver has been drafted and approved which allows RBC to enter into a direct contract award with YMCA Reading. A three-year initial contract period is proposed, with an extension period of up to 24 months.

2. RECOMMENDED ACTION

- 2.1 That Policy Committee approve a contract award for the provision of Accommodation with Support for Young People for a period of three years, with the option to extend up to a maximum of 24 months, to YMCA Reading in accordance with the approved CPR waiver.

3. POLICY CONTEXT

- 3.1 The Council is committed to reducing homelessness for young people and care leavers in Reading and this is outlined in both its Rough Sleeping and Homelessness Strategies.
- 3.2 RBC's local housing authority has a duty to assess and accommodate if there is reason to believe an individual is homeless, eligible for assistance and in priority need. Those in priority need include young people aged 16-17, those leaving care and any young person with significant health issues that means they are vulnerable. Across all RBC departments there is a wider corporate parenting responsibility owed to children under the age of 18.
- 3.3 Depending on their specific circumstances young people aged under 18 may be eligible for assistance from Children's Social Care and/or the local housing authority. Local authority duties to young people and care leavers are set out under the following legislation:
- Children Act 1989 (as amended by the Children (Leaving Care) Act 2000, the Adoption and Children Act 2002 and the Children and Young Persons Act 2008)
 - Children Act 2004
 - Housing Act 1996 Part 7 (as amended by the Homelessness Act 2002, the Localism Act 2011 and the Homelessness Reduction Act 2017)
 - Children and Social Work Act 2017
- 3.4 Reading has a joint working protocol between RBC Housing and BfFC for the assessment of 16- and 17-year olds. One of the protocol's objectives is to prevent young people from being referred, back and forth, between the two statutory bodies.
- 3.5 Any accommodation provided by either RBC Housing or BfFC must be suitable for the young person's needs. Bed and breakfasts are considered unsuitable emergency accommodation for 16- and 17-year olds where case law advises that they should be placed into accommodation where appropriate support is available.

4. THE PROPOSAL

(a) Current Position:

- 4.1 YMCA Reading is the only DEGNS (Housing Needs) commissioned accommodation with support service specifically for young people in Reading aged 16 - 25. It provides 40 self-contained units, 12 of which share 3 cluster kitchens. The Service provides 24/7 staffed accommodation with support for single people aged 16-25 who have medium to high needs and specialist accommodation for mothers with babies.
- 4.2 RBC Housing hold the main contract for the 40-bed accommodation service, but referrals and performance monitoring are managed jointly between RBC Housing and BfFC commissioners. This reflects the overlapping duties which Housing and BfFC have towards young people.
- 4.3 RBC Housing provides the full budget for the main contract at £318,363 per annum. BfFC fund the rent and service charge element for certain groups that are not entitled to claim Housing Benefit. BfFC directly commission an emergency provision resource at YMCA, under a £10k block contract.
- 4.4 The Service's initial contract period was 2013-2016. An extension was granted until 2019 and since 2019, an interim contract has been granted year-on-year. The current contract term expires on 30 September 2021.

Needs Analysis

- 4.5 In order to determine future provision a review of accommodation and support options for young people aged 16-25 has been undertaken by RBC Housing with contribution from BfC commissioners. The focus was upon those who do not require semi-independent supported living commissioned by BfC, but who require accommodation with medium - higher level support prior to moving on into independent living. A fuller account of this analysis is in Appendix A.
- 4.6 The review determined that there is a clear need for accommodation for young people requiring higher levels of support in accommodation due to having multiple needs. This includes those who have found it challenging to sustain accommodation and move on into independent living.
- 4.7 The review also determined that, there are fewer supported accommodation options for those at the younger end of the cohort and services should focus on them, for which the current capacity (40 units) is required. There is a continued need for a local service in Reading for young people that sits outside of the semi-independent supported living framework commissioned by BfC.
- 4.8 It was also identified that there is a need for a locally accessible option for young people for whom the shared house environment typical of semi-independent settings is not a preference for them. This needs to be a service that provides accommodation with 24/7 on-site support and staffing, or at the very least, a service that provides access to staff support 24/7 within the Reading area, supporting BfC sufficiency requirements to place locally. This type of accommodation enables RBC and BfC to:
- a) meet homelessness need.
 - b) provide local Children Looked After (CLA) with a medium-high level of support and accommodation.
 - c) avoid the use of unsuitable emergency or temporary accommodationⁱ.
 - d) adequately safeguard young people to which there is a corporate parental responsibility.
- 4.9 The needs analysis considered different models of delivery in relation to the needs of the cohort, the available local accommodation provision and the financial envelope to commission future services for young people. It was considered that the current set up (40 bed unit) offered the best value for money whilst continuing to meet the needs of young people.
- 4.10 Following the review of YMCA Reading provision against young peoples' needs, it was determined that YMCA Reading could continue to provide accommodation with support for young people following a negotiated review of the terms of contract. YMCA currently effectively meets the needs of young people in Reading, however additional requirements and gaps were identified, including the need for more targeted management of move on from the provision, increased focus on prevention of evictions and more integrated support for higher needs client group.
- 4.11 A waiver to CPR 10(1) was drafted and signed off on 26th May 2021 by the Executive Director of Economic Growth and Neighbourhood Services and Assistant Director for Procurement and Contracts. The rationale for this waiver was the lack of available suitable property in Reading to deliver the service (see section 4.18 onwards) and the costs associated with the development of an entirely new service.

(b) Option Proposed

- 4.12 It is proposed that RBC awards a three-year contract to the YMCA, with an extension period of up to 24 months, the overall contract value £270,000. This is at cost of £248,000 to RBC which is a reduction of £70,000 on the existing contract.

The longevity of contract enables stability and the ability to deliver the agreed service within the revised and reduced funding envelope. It also enables added value elements to be sustained and developed further.

BFFC intend to contribute £22,212 p.a. (approved by BFFC Executive Committee 15/03/21) to reflect outcomes specifically for young people where there are duties owed by them. BFFC have previously funded and intend to continue to fund the emergency provision space at YMCA Reading which benefits from the added value of on-site 24/7 staffing provision provided by the main contract.

4.13 The proposed contract is for an accommodation with support service for young people to be delivered under a revised specification, objectives, commissioning and monitoring arrangements which ensure value for money. This proposal identifies changes to improve the service that young people aged 16-25 receive and address gaps in current provision. The Service will need to deliver in alignment with Reading's wider 18+ Homelessness Support Services that were recommissioned in October 2018 and in accordance with BFFC 16+ standards framework.

4.14 To ensure value for money was achieved, RBC and BFFC entered into without prejudice direct negotiations with YMCA Reading. In addition to the current service provision and delivery 40 units of accommodation, the following changes have been included in a newly agreed Service Specification delivering additional value to the contract:

- **Increased focus upon prevention of eviction of 16-17-year olds** - particularly those who are not accommodated under section 20 of the Children Act (as amended). Closer tracking and support are needed for this cohort.
- **Mental health specialism to be incorporated into main contract support hours.** 20 hours per week for an in-house Life Skills Counsellor and counselling provision. This provides mental health support that can otherwise be difficult to access where CAMHS and CMHT have high thresholds and long lead in times. Specialist mental health support at the YMCA Reading has been delivered as temporary and added value but will now be framed as a core deliverable within the contract.
- **Commitment to develop trauma and psychologically informed environment (PIE)** and ways of delivering support. This will include specific training for staff and reflective practice and a focus upon adverse childhood experiences.
- **Lowered age criteria from 16-25 to 16-24** to ensure that the Service's youngest cohorts are safeguarded, and support is targeted. Needs analysis and service review shows that no-one aged over the age of 23 has been newly placed into YMCA Reading in the last three years. Move-on is planned prior to someone's 25th birthday.
- **Wrap around support integrated into the main support contract.** Support for higher needs clients will be dynamically scaled-up and down in accordance with needs.
- **Specification to clearly define move-on expectations and strategy.** This includes setting expectations with clients at move-in and targeted provider/commissioner planning. This is particularly relevant for young people entering employment to ensure swift and affordable move-on to minimise rent arrears and debt.

4.15 **Contract monitoring and commissioning arrangements:**

4.16 Joint commissioning between RBC and BFFC enables continued commitment from both services to: achieve smooth transitions for young people, drive value from the contract, enable more dynamic service monitoring and work jointly with the provider to drive service improvements.

4.17 At BFFC Executive Committee on 15th March 2021 BFFC confirmed (a) commitment to adopt a joint commissioning approach for future young people's provision and (b) agreement to proceed with a proposal for a negotiated direct contract award to YMCA Reading on the same contract term and extension period for the emergency accommodation facility.

4.18 The following revised and enhanced monitoring framework and newly agreed Terms and Conditions and Service Specification will be agreed with YMCA Reading to ensure that the contract is delivering full value:

- **Joint contract/signatories comprising RBC and BfC** including apportioned payment schedule for the main contract and the emergency space facility. Shared monitoring arrangements to be included in the same joint contract Terms and Conditions.
- **Fully revised, honed and focussed KPIs** and quarterly monitoring reports.
- **Increased emphasis on the provider showing an active demonstration of ongoing service development activity** with strong partnership working, service user involvement and focus upon early intervention and prevention. This will include, regular file audits and case study examples to identify improvements, provision of quarterly report on initiatives explored such as funding opportunities, good practice implemented and service promotion and an annual strategic review and report that includes capture of service user feedback and action planning.
- **Commitment to review scheme referrals and placements within a multi-agency problem solving panel** including commissioners from RBC and BfC, YMCA Reading and relevant external agencies. This approach has been proven to work in Reading e.g. the Access Panel for Homelessness Support Services. It would aim to provide a collaborative problem-solving environment, improve relationships and communication between commissioner/provider and wider partners. It would target clients who are not LAC or care leavers for whom statutory support is not provided.

(c) **Other Options Considered**

4.18 The alternative option to directly awarding this contract would be to test the market with an open procurement exercise. The main reason this was not considered to be a suitable option was because the availability of suitable property is a limiting factor, meaning that direct negotiation with the YMCA would result in better value and quality.

4.19 It is not policy for the YMCA to allow alternative providers to operate from their buildings. Therefore, use of this building under any open tender is not an option. This is a support only contract award and any tendering parties would be required to bring their own property portfolio to their bid, for which there is very little availability in Reading.

4.20 For context, RBC Housing Needs undertook a full procurement exercise in 2018 for the recommissioning of 18+ supported accommodation services in Reading. From this it is known that buildings of similar size to the YMCA provision are not available. Additionally, RBC Housing Needs have scoped the availability of buildings for grant fund applications since March 2020 for those accommodated from the streets into B&B during the pandemic. No suitable building was identified and therefore, the new 40 modular unit site at the Cattle Market Car Park is being developed to meet this need.

4.21 RBC have also scoped the acquisition of dispersed 3-4 bed units for other grant fund applications. Acquiring and bringing dispersed units on-line in Reading, to meet the need of 40 individuals, would be highly challenging in the current market for either RBC or any organisation submitting under an open tender and would come with additional cost. This model would also come with greater support costs associated with the dispersal of the accommodation as the economies of scale of that is realised with 40 units in one building would be lost.

4.22 It is recognised that an open tender could allow a provider to develop/propose a dispersed accommodation model. Capital set-up costs could be significantly lowered using leased HMO units to accommodate those supported under the contract. However, this approach would:

- cost more per unit under the support contract and therefore reduce capacity/potentially halve future young person's provision;
- be unlikely to meet increasingly complex need, especially youth mental health needs in the aftermath of the pandemic;
- not be staffed 24/7 where a 40-bed unit provides economies of scale, especially considering the funding reduction outlined in section 3.1. This increases risk to young people around cuckooing, county lines and wider ASB and vulnerabilities/risks to young people in Reading;
- require more complex contract management; and
- potentially reduce VfM where new or over-ambitious housing associations are expanding stock, driven by venture capital investment, hence recent regulatory sanction of said providers.

4.23 Post pandemic, there are potential options for the regeneration of empty commercial spaces, but this would entail capital costs to anyone submitting a bid to a full tender, or capital costs to RBC to make a suitable unit available. The capital costs for the modular units are circa £50k per unit, approx. £2.2m for the full 40-unit site.

4.24 It was determined that it is extremely unlikely that in undertaking an open tender exercise for this contract that an alternative interested provider could procure, fit out and mobilise equivalent accommodation at a cost and quality which would meet, or exceed, the potential ongoing provision available through YMCA Reading.

5. CONTRIBUTION TO STRATEGIC AIMS

5.1 The proposal will align with the overall direction of the Council and meet Corporate Plan priorities by:

- Ensuring access to decent housing to meet the needs of local young people aged 16 - 24
- Protecting and enhancing the lives of vulnerable children and young adults through the proposed accommodation with support

5.2 The proposal contributes to the Council's strategic aim to promote equality, social inclusion and a safe and healthy environment for all.

5.3 Secure and stable accommodation with support options for young people aged 16 - 24 ensures that young people in Reading can receive targeted support to overcome barriers from childhood and perhaps other disadvantage such as substance misuse, mental ill-health and offending histories. With support, homeless young people can enter employment, education or training and transition into independent living.

5.4 Social value

5.4.1 YMCA Reading would support Reading's Social Value Policy aims by being an initiative that supports local skills and employment and supports digital inclusion. Education, employment and training (EET) are main deliverables under the support contract and the organisations added value elements. YMCA Reading provides Wi-fi to all residents as added value and embeds digital education in all EET activities. Social value will be included as a strategic service aim in any new contract and is to be included in YMCA Reading's Annual Strategic Review.

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

6.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers).

6.2 The YMCA, as a global charity, states its commitment to advancing conservation to reduce the effects of climate change through youth-led education programmes and advocacy initiatives that improve environmental awareness. They believe that every

young person can contribute to reducing environmental degradation and its consequences. YMCA programmes support young people to coordinate sustainable practices and to advocate on issues relating to the environment and climate change. There are 70 worldwide YMCAs working on environment related issues and this includes 2,400 programmes involving over 232,000 people.

- 6.3 The agreed accommodation with support Service Specification between RBC, BfC and YMCA Reading will ensure that young people are supported to have a level of awareness around climate change and to develop sustainable practices that can be continued into independent living. The proposal to award YMCA Reading this contract for accommodation with support for young people supports the Council's ability to respond to the Climate Emergency and in achieving a carbon neutral Reading by 2030. This proposal aligns with the Council's Climate Change Strategy and associated action plan.

7. COMMUNITY ENGAGEMENT AND INFORMATION

- 7.1 Consultation/community engagement has not been undertaken prior to this report for recommended action/decision. As outlined fully in section 9.3 a waiver business case was signed off to approve a deviation from the Council's Contract Procedure Rules (CPRs). The deviation was as outlined in section 9.3. An open public consultation, having achieved sign-off on the CPR waiver, would not have been genuine, transparent or intended to influence the decision being sought in this Committee Report.
- 7.2 BfC and RBC staff were asked for independent feedback by Council officers and YMCA Reading undertook service user feedback regarding the current service that they provide. Although not a full and open consultation, key stakeholders were involved and a summary of this can be found in section 3 of Appendix A.

8. EQUALITY IMPACT ASSESSMENT

- 8.1 Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, 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 An Equality Impact Assessment (EIA) is not relevant to this decision and it has been determined that the decision will not/could not have a differential impact on: racial groups; gender; people with disabilities; people of a particular sexual orientation; people due to their age; people due to their religious belief.

9. LEGAL IMPLICATIONS

- 9.1 The current contract term expires on 30 September 2021 and if agreed the new contract term is due to start from 1 October 2021. It will be necessary for the Council & Brighter Future of Children to enter into a new contract jointly with YMCA Reading for the new term of the service.

9.2 Homelessness Legislation

Under Part 7 of the Housing Act 1996, as amended, local authorities have a statutory responsibility to secure accommodation for homeless households in priority need who are unintentionally homeless and to whom a homelessness duty has been accepted i.e. a 'main homelessness duty'. This main homelessness duty continues until a

settled housing solution is found for the homeless household or until the duty otherwise ends. Local authorities must ensure that advice and assistance is available free of charge to households which are either homeless or threatened with homelessness. The legal implications associated with the duties owed to the client group affected by this report's decision are outlined in sections 3.2 - 3.7 of this report.

9.3 Procurement

The procurement for Accommodation with Support for Young People and entering into a direct negotiation and contract award with YMCA Reading breaches CPR 10(1) which states "where an estimated value of a contract exceeds the current EU thresholds then the contract shall be tendered in accordance with the Public Contracts Regulations 2015 or the Concessions Regulations 2016 as appropriate". For this decision to be recommended a waiver to CPR 10(1) was drafted and signed off on 26th May 2021 by Frances Martin, Executive Director for Economic Growth and Neighbourhoods and Kate Graefe, Assistant Director for Procurement and Contracts.

10. FINANCIAL IMPLICATIONS

10.1 Reading Borough Council (RBC) currently commissions YMCA Reading to deliver a contract to the value of £318k.

10.2 As part of a package of savings across Council departments, savings were agreed from young people's services of £70k at Council on 23rd February 2021, provided such a saving was consistent with the Council's legal duties. The proposals in this paper will deliver that saving in part in 21/22 and in full in 22/23.

10.3 Within the proposed contract, the cost to Reading Borough Council is £248,000 p.a. resulting in a 70K cost reduction and saving to the Council.

10.4 The overall proposed contract value is £270,000 p.a. BFFC intend to contribute £22,212 p.a. and this has been approved by BFFC Executive Committee (15/03/21). BFFC have previously funded and intend to continue to fund the emergency provision space at YMCA Reading which benefits from the added value of on-site 24/7 staffing provision provided by the main contract. The income will come as a contribution from BFFC.

10.5 The new contract is planned to start half way through 21/22 and so will deliver a saving of £35k in that year, but that will rise to £70k in 22/23. Contract values do not and are not intended to include an annual inflationary uplift and this is noted by YMCA Reading.

10.4 Value for Money (VFM)

As referred to in the report at 4.14 direct negotiations have allowed RBC to achieve cost savings of 70K to this contract, whilst continuing to deliver the current service provision and the delivery of 40 units of accommodation. In addition, negotiations have agreed the delivery a range of improvements to the Service which mean better outcomes for young people and will support agencies across the Borough to deliver more effectively for this cohort.

10.5 Risk Assessment

No key financial risks have been identified with this proposal.

11. BACKGROUND PAPERS

11.1 YMCA Reading - Summary Report. Parenting Panel on 23 February 2017.

APPENDIX A - REVIEW OF SERVICE AND NEEDS ANALYSIS

1. Homelessness and young people

1.1 There is a clear continued need for housing with support for young people in Reading. There was a 47% increase in homelessness approaches from young people aged 16 - 24 in Reading between 2018/19 and 2020/21. There has been an increase in the volume of young people requiring higher levels of support in accommodation - including those who have found it challenging to sustain accommodation and move on into independent living from either current YMCA Reading provision, or from other age-generic supported housing commissioned by RBC for homeless clients.

1.2 Annual rough sleeping count figures and an analysis of those found bedded down, show a low incidence of rough sleeping for those aged 16 - 24 suggesting upstream prevention work and interventions for younger groups across BfFC and Housing are effective. This has been reflected in there being little demand for emergency accommodation from this age group throughout the pandemic ('Everyone In' between March - August 2020 and Winter Provision since December 2020).

2. Reading's need for a specific young person's service

2.1 The availability of local, dedicated 24/7 staffed supported accommodation provision for young people enables RBC and Brighter Futures for Children (BfFC) to meet homelessness need, to provide local Children Looked After (CLA) with a medium- high level of support and accommodation and to avoid the use of unsuitable emergency or temporary accommodationⁱⁱ.

2.2 Current support provision and future support provision needs to broadly meet the housing and support needs of those aged 16 - 24 years old. However, it needs to meet the needs of the following *specific* client groups for whom the local housing authority and/or BfFC have a statutory responsibility under the Children Act 1989 or the Housing Act 1996 (as amended by the Homelessness Reduction Act 2017):

- a) 16- and 17-year olds to whom either BfFC or the Local Housing Authority will owe a statutory duty, including Unaccompanied Asylum Seekers (UASC)
- b) 16- and 17-year olds who require an emergency housing response (emergency provision service)
- c) 18 - 24-year olds who are vulnerable, or may be care leavers
- d) 16 - 24-year olds who have a baby where the child (and potentially the mother) is under the supervision of BfFC

2.3 An analysis of all outcomes from YMCA Reading between 1 April 2018 and 31st March 2021 showed that:

- **Outcomes for under 18-year olds:** When placed by BfFC remained at the Service for, on average, nine months post turning 18 which suggests stability is maintained for young people reaching adulthood.
- **Moving to independent accommodation:** 39% of all young people moving on from the service moved into independent accommodation e.g. social housing or private rented accommodation via the Rent Guarantee Scheme. For this cohort tenancy sustainment outcomes are strong. Approximately 80% of young people who moved on from the Service before July 2019 were still in this accommodation 18 months later.
- **Unplanned exits (evictions and abandonments):** 33% were evicted or abandoned their accommodation. Whilst active licence management and potential sanctions are needed in 24/7 supported accommodation settings, this was identified as an area for improvement in future commissioning.
- **Reasons for unplanned exits:** There are higher rates of behaviour related evictions due to anti-social behaviour and non-engagement for those aged 16/17 (44%). This is related directly to those who are assessed as non-LAC and not able to access the full support package a LAC is offered by BfFC under s.20 and as a care leaver.

- **Emergency provision:** The unit has been recently underutilised. However, this usage pattern could reflect better prevention outcomes.
- 3. Service use and officer feedback**
 - 3.1 Anonymised survey feedback from YMCA Reading service users in 2019/2020 indicated that most residents find the Service and staff supportive and safe, assisting them well towards independence.
 - 3.2 Feedback from RBC and BFfC officers collated in January/February 2021 indicated that:
 - YMCA Reading have made positive investment in dedicated counselling resources for residents to enable access to needed mental health support
 - YMCA Reading are committed to establishing strong local partnerships to support residents' steps towards independence within the sport, skills and faith arenas
 - There is scope for improvements in the support provided to young people with practical life skills to achieve independence and in managing the impact of more chaotic young people in the wider cohort accommodated at the Service
 - 4. Identified gaps in service and projected need across RBC and BFfC**
 - 4.1 Since the Homelessness Reduction Act was implemented in April 2018, homelessness approaches for 16 - 24-year olds have increased by approximately 25% year-on-year, indicating a continued need for accommodation with support for this age group.
 - 4.2 BFfC anticipate a continued service requirement at present levels for lower needs 16-17s and mother and baby placements.
 - 4.3 YMCA Reading provide a Service that enables the following positive outcomes for young people: transition for lower needs 16 - 17s to leave care; mother and baby provision for young parents aged 18+ and provision for those aged 18 - 24 with lower needs. These outcomes can be affected by a smaller cohort of residents who have higher, unmet needs.
 - 4.4 Young people with higher needs have fewer suitable provisions in currently commissioned homelessness support services. Willow House is commissioned for those aged 18+, but this service offers accommodation for those who can have entrenched rough sleeping, drug and alcohol needs and offending histories. Launchpad are commissioned to meet the needs of those with lower support needs working towards independent and their HMO properties are often used as move-on opportunities for YMCA Reading.
 - 4.5 The cohort of young people with higher support needs include adverse childhood experiences, learning and/or communication difficulties, unmet mental health needs, substance misuse difficulties and transient housing history (including care leavers). This group would benefit from intensive wrap-around support providing psychologically informed interventions, in a setting with pro-active housing management including evenings and weekends. Needs analysis of the younger cohort suggests a need for up to five higher needs support placements per annum to better meet need.
 - 4.6 An analysis of overall pathways and outcomes for young parents placed into temporary accommodation by RBC indicates that tenancy sustainment outcomes could have been improved in about 35% of cases.

ⁱ Joint MHCLG/ DfE guidance guides that bed and breakfast accommodation is not suitable for any 16 or 17 year old. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/712467/Provision_of_accommodation_for_16_and_17_year_olds_who_may_be_homeless.pdf

ⁱⁱ Joint MHCLG/ DfE guidance guides that bed and breakfast accommodation is not suitable for any 16 or 17 year old. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/712467/Provision_of_accommodation_for_16_and_17_year_olds_who_may_be_homeless.pdf

READING BOROUGH COUNCIL

REPORT BY EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES

TO:	POLICY COMMITTEE		
DATE:	23 SEPTEMBER 2021		
TITLE:	ARTICLE 4 DIRECTION TO REMOVE PERMITTED DEVELOPMENT RIGHTS THAT WOULD RESULT IN RESIDENTIAL DEVELOPMENT		
LEAD COUNCILLOR:	COUNCILLOR PAGE	PORTFOLIO:	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT
SERVICE:	PLANNING	WARDS:	ALL EXCEPT MAPLEDURHAM AND THAMES
LEAD OFFICER:	MARK WORRINGHAM	TEL:	0118 9373337
JOB TITLE:	PLANNING POLICY TEAM LEADER	E-MAIL:	mark.worringham@reading.gov.uk

1. EXECUTIVE SUMMARY

- 1.1 Permitted development rights are rights that have been granted in legislation to undertake certain developments without the need to apply for planning permission. The Local Planning Authority has the powers to make a direction removing specified permitted development rights within a defined area, known as an Article 4 direction.
- 1.2 This reports recommends making a non-immediate Article 4 direction to remove certain permitted development rights that would result in new residential dwellings across the town centre, district and local centres, core employment areas and a number of other commercial areas. The direction would come into force on 31st October 2022.
- 1.3 Appendices:
Appendix 1: Equality Impact Assessment
Appendix 2: Draft Article 4 direction
Appendix 3: Evidence document

2. RECOMMENDED ACTION

- 2.1 That Committee agrees that a non-immediate Article 4 Direction be made covering the area shown in Appendix 2 to remove the following permitted development rights within Schedule 2 of the General Permitted Development Order 2015 (as amended):
- Part 3 class MA;

- Part 3 class M;
 - Part 3 class N;
 - Part 20 class ZA;
 - Part 20 class AA;
 - Part 20 class AB.
- 2.2 That the Assistant Director of Planning, Transport and Regulatory Services be authorised to make any minor amendments necessary to the direction that do not alter its main purpose, in consultation with the Lead Councillor for Strategic Environment, Planning and Transport, prior to serving notice of the direction.
- 2.3 That Committee agree that relevant groups and individuals should be notified of the making of the Article 4 direction, including use of representative bodies of businesses rather than individual service on all landowners.

3. POLICY CONTEXT

Permitted development rights

- 3.1 There are a number of forms of development which benefit from ‘permitted development rights’ (PDR) under the Town and Country Planning (General Permitted Development) Order 1995 (as amended) (known as the GPDO) and therefore do not require planning permission. These are set out in Schedule 2 of the GPDO. The range of types of PDR are wide, but include minor alterations to houses, some telecommunications development and some development by statutory undertakers and the Crown. In the last ten years, PDR has increasingly been used by the government to allow more major forms of development. Of perhaps the highest profile has been the right to change from offices to residential (formerly Part 3 class O) without planning permission, introduced in 2013, which required instead a much more light-touch ‘prior approval’ process where only a very limited number of factors can be taken into account.
- 3.2 The use of PDR has been expanded significantly again in 2020 and 2021, with not only additional uses able to change to residential without planning permission as a result of the introduction of the new use class E with associated PDR to convert to residential, but also a suite of new rights allowing upward extension or demolition and rebuild of residential and commercial buildings to provide new dwellings.
- 3.3 The following PDR currently exist that would allow the creation of new dwellings, subject to a prior approval process. References are to Schedule 2 of the GPDO:
- Change of use of commercial, business and service use (use class E) to residential (Part 3, class MA);
 - Change of use of hot food takeaway, betting office, payday loan shop or launderette to residential (Part 3, class M);
 - Change of use of casino or amusement arcade to residential (Part 3, class N);

- Demolition of single, purpose built, detached block of flats or a single, detached office, light industrial or research and development building and its replacement with a detached block of flats or detached house (Part 20, class ZA);
 - Up to two additional residential storeys on a detached, purpose built block of flats (Part 20, class A);
 - Up to two additional residential storeys on a detached commercial or mixed-use building (in use for retail, financial and professional, restaurant and café, office, research and development, light industrial, betting shop, payday loan shop, launderette) (Part 20, class AA);
 - Up to two additional residential storeys on a two or more storey terraced commercial or mixed-use building (see class AA for uses) or one additional storey on a one storey building (Part 20, class AB);
 - Construction of new residential above a terraced house, two storeys in the case of houses of two or more storeys or one additional storey in the case of a one storey house (Part 20, class AC);
 - Construction of new residential above a detached house, two storeys in the case of houses of two or more storeys or one additional storey in the case of a one storey house (Part 20, class AD).
- 3.4 Each of the above rights has its own set of restrictions and conditions which limit the ability to take up the right, and matters that can be considered through the prior approval process. However, these are far from comprehensive. For instance, there is no ability to specify the type of accommodation (in terms of number of bedrooms), and, for changes of use from use class E, no safeguard against loss of essential services and facilities (other than medical facilities and nurseries). Conditions around vacancy are weak, and there remains no mechanism to seek contributions towards affordable housing. Whilst these conditions and caveats may therefore be of some use, they will by no means address all the potential impacts.
- Article 4 directions**
- 3.5 Under Article 4 of the GPDO, a planning authority can remove specified PDR, and require that a planning application be made. There are a number of existing Article 4 directions in operation in Reading. For instance, for many years, small clusters of houses with patterned brickwork or other features have been subject to Article 4 to remove rights around development in the curtilage of a dwellinghouse. In addition, more recently, Article 4 directions have been put in place in much of Park, Redlands and Katesgrove wards, as well as Jesse Terrace, to control the conversion of dwellinghouses to small houses in multiple occupation.
- 3.6 There are two types of Article 4 direction: immediate and non-immediate. An immediate Article 4 direction, once served on an area, removes the specified PDR with immediate effect. However, under Sections 107 and 108 of the Town and Country Planning Act 1990, the Council would be liable to pay compensation to landowners if permitted development rights were removed less than 12 months before initial notification. For this reason, a non-immediate Article 4 direction, where the direction comes into force at least 12 months after it was initially made, would almost always be the preferred route.
- 3.7 The process for making a non-immediate Article 4 direction would be broadly as follows:

- Article 4 is made (after agreement by the relevant committee) and notice given by advertisement, site notices and by serving notice on every owner and occupier (unless the number of owners and occupiers makes service impracticable). The date the notice comes into force must be specified, and must be at least 12 months after last notice of making the direction to avoid compensation issues.
- There would be a period of at least 21 days for consultation responses.
- At least 28 days after the last notice was served, the Article 4 would be confirmed by the relevant committee, and notice of confirmation served in the same way as the initial notice.
- The Article 4 direction would come into effect on the specified date.

3.8 The Secretary of State must be notified about any Article 4 direction, and has powers to modify and cancel directions. An Article 4 direction can be made only where it is ‘expedient’, and it therefore requires justification. Planning Practice Guidance states that

“The use of article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. The potential harm that the direction is intended to address will need to be clearly identified, and there will need to be a particularly strong justification for the withdrawal of permitted development rights relating to:

...

- *cases where prior approval powers are available to control permitted development*

...”

3.9 Therefore, any proposal to put an Article 4 direction in place will need to be accompanied by clear evidence to show the harm that results from the PDR.

3.10 The government have also recently further raised the bar for Article 4 directions that control changes of use to residential, with a Written Ministerial Statement (WMS) (1st July 2021) followed by corresponding changes to the National Planning Policy Framework (NPPF) (20th July 2021). The NPPF states that the use of Article 4 directions should

- *“where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)”*

This test is considerably more stringent than the test in the version of the NPPF before July 2021.

3.11 The WMS clarified this matter further as follows:

“Article 4 directions should be very carefully targeted, applying only to those locations where they are necessary to avoid wholly unacceptable adverse impacts. For that reason, I want to make clear that the geographical coverage of all Article 4 directions should be the smallest area possible to achieve the aim of the Article 4 direction. In respect of historic high streets and town centres, this is likely to be the irreducible core of a primary shopping area. It is very unlikely to be applicable to a

broad area, and is not expected to be applied to an entire local authority area. Local authorities will need to have robust evidence to justify the Article 4 direction and the area it covers.”

- 3.12 Finally, the WMS makes clear that the Secretary of State will make use of his powers regarding Article 4 directions where necessary.
“I will instruct my officials to look closely at all new Article 4 directions to check that they comply with the new policy, and I will consider exercising my power to intervene if they do not.”
- 3.13 The first key point in the WMS is that there is clearly a recognition that protecting historic high streets is a potentially appropriate use of such directions, but that there is no explicit recognition of any other reason. Whilst the WMS does state that inclusion of whole town centres will not be appropriate to protect high streets, it does not state how directions covering whole town centres will be considered if they are justified by other forms of harm, e.g. loss of key employment space.
- 3.14 The second main point is that the bar will clearly be set extremely high and there is clearly a possibility that the Secretary of State will use powers of modification or cancellation. However, as set out in the evidence document (Appendix 3), officers’ view is that the proposed direction is clearly necessary to avoid wholly unacceptable impacts. The evidence document further examines scope to reduce the proposed Article 4 area and the smallest area possible to avoid these impacts is therefore proposed to be covered.
- 3.15 As the July 2021 version of the NPPF introduces a new test for Article 4 directions relating to change of use to residential, there are no precedents for how the Secretary of State will assess proposed directions to control these changes.

4. THE PROPOSAL

4.1 Current position

- 4.1.1 The current position is that the PDR set out in paragraph 3.3 apply in Reading Borough, and that applicants are only required to apply for prior approval to undertake these developments, during which only those matters specified in the PDR in the legislation can be considered. No Section 106 agreements can be attached to these prior approvals.
- 4.1.2 There has been considerable take-up of some of these PDR in Reading, in particular conversions of office to residential (now superseded by changes from use class E to residential). Up to 31st March 2021, 1,087 new dwellings had been completed by this PDR, and around 55,000 sq m of office accommodation had been lost. A further 560 dwellings had prior approval at 31st March 2021, which would result in the loss of a further 31,000 sq m of office floorspace.
- 4.1.3 There has also been some take-up of the other PDR for conversion to residential from retail and related uses and storage and distribution, but this has been much lower due to the low size limits that applied until recently. Only 28 dwellings have been delivered through these routes, with around

1,500 sq m of floorspace lost, most of which has involved conversion from shops.

- 4.1.4 There have been no approvals so far for the other forms of PDR, for demolition and rebuild and upward extension. These are new PDR, only put in place in 2020, and it is yet to be seen whether there will be significant take-up in Reading.
- 4.1.5 The Council has significant concerns around the implications of these PDR. The Council objected to the original introduction of office to residential PDR almost ten years ago, and has consistently objected to further roll-out of PDR ever since. It applied for an exemption from the office to residential PDR when originally introduced but was not successful. The Council also recently contributed to the Housing, Communities and Local Government Committee's inquiry into permitted development rights, including giving evidence to a hearing.
- 4.1.6 Of the concerns raised in the evidence to the inquiry, the following represent specific planning harm that could justify applying restrictions:
- Dwellings are often of poor quality and rarely provided with essential private or communal outdoor space;
 - PDR for residential accommodation is dominated by small dwellings, both in terms of internal size and number of bedrooms, with 83% of new dwellings provided in Reading through PDR being one-bedroom or studio, and does not match the identified need for different sizes of homes;
 - It results in residents being introduced to areas which are wholly inappropriate as a place to live, for reasons such as noise and disturbance;
 - There has already been a significant loss of commercial floorspace of around 56,000 sq m of floorspace, not all of which was vacant, which reduces the space available to local businesses;
 - PDR can impact existing businesses adjacent to residential PDR by limiting their ability to operate and expand;
 - There is likely to be a loss of essential local shops and services, which will undermine high streets;
 - It fails to make essential provision for affordable housing to meet the high local levels of need, with RBC having potentially missed out on 586 on-site affordable homes and £3.64 million in off-site contributions to affordable housing;
 - There is no mechanism to secure contributions to meeting infrastructure needs generated by the development, with RBC having potentially missed out on £2.17 million towards education and open space infrastructure;
- 4.1.7 The HCLG Committee report was published in July 2021¹, and among its recommendations was that the further extension of PDR, including the new class MA, be paused and that a review of the role of PDR in the planning system be carried out.
- 4.1.8 In line with the requirements to justify any proposals for an Article 4 direction, the Council has prepared an evidence document (Appendix 3) that looks at these types of harm in more detail in section 5.

¹ [Permitted Development Rights \(parliament.uk\)](https://www.parliament.uk/evidence-to-committees/2021/07/2021-07-20-permitted-development-rights)

4.2 Option Proposed

4.2.1 Committee is recommended to agree to make a non-immediate Article 4 direction which withdraws the following PDR:

- Change of use of commercial, business and service use (use class E) to residential (Part 3, class MA);
- Change of use of hot food takeaway, betting office, payday loan shop or launderette to residential (Part 3, class M);
- Change of use of casino or amusement arcade to residential (Part 3, class N);
- Demolition of single, purpose built, detached block of flats or a single, detached office, light industrial or research and development building and its replacement with a detached block of flats or detached house (Part 20, class ZA);
- Up to two additional residential storeys on a detached commercial or mixed use building (in use for retail, financial and professional, restaurant and café, office, research and development, light industrial, betting shop, payday loan shop, launderette) (Part 20, class AA); and
- Up to two additional residential storeys on a two or more storey terraced commercial or mixed use building (see class AA for uses) or one additional storey on a one storey building (Part 20, class AB).

4.2.2 It is recommended that this be applied to the following areas:

- The entire town centre, as defined in the Local Plan;
- District and local centres, as defined in the Local Plan;
- Core employment areas, as defined in the Local Plan;
- Other primarily commercial or retail locations; and
- Areas with the poorest levels of air quality.

4.2.3 The draft Article 4 direction is set out in Appendix 2. This specifies the area within which the direction would apply, which includes the town centre, district and local centres, core employment areas and other primarily commercial areas. The draft is subject to potential modification in terms of legal requirements of the wording, and Committee is recommended to delegate these modifications to the Assistant Director of Planning, Transport and Regulatory Services in consultation with the Lead Councillor for Strategic Environment, Planning and Transport.

4.2.4 The intention of the Article 4 direction is not to halt all changes of use or development on commercial sites to residential use. Rather, the direction will give the Council more control over relevant applications through the planning process, to help protect the existing office and industrial supply and to guard against the harm set out in this report. It will allow the consideration of other planning matters such as affordable housing or amenity space provision to be considered with change of use applications, which would not otherwise be possible with the PDR in force.

4.2.5 The justification for this approach is set out in full in the evidence document (Appendix 3). The methodology of the evidence document is broadly as follows:

- Identify all forms of PDR that would result in residential development in Reading;

- Identify broad types of area for assessment purposes (e.g. town centre core, town centre fringe, employment area);
- Assess the claimed benefits of PDR, in particular in terms of boosting housing supply;
- Assess each form of harm that arises as a result of PDR and provide evidence for why it should be addressed through an Article 4 direction and whether there are wholly unacceptable adverse impacts;
- Examine which forms of harm are relevant to which type of PDR and which areas of Reading, and, based on this, outline the broad scope of the direction; and
- Seek to refine the geographical area of the proposed direction by reducing to the smallest possible geographical area.

4.2.6 In brief, the resulting proposed direction does not cover all forms of PDR that would result in residential development, nor does it cover the entire Borough, but it does cover those areas and forms of development where the greatest harm is likely to arise. In particular, it does not address the forms of PDR which would involve new flats on top of existing flats or houses, generally because these have some very distinct implications and the geographical area that would be needed would be very different. It does not prevent the Council from seeking to implement further directions to cover other geographical areas or other forms of PDR in the future.

4.2.7 If Committee agrees this recommendation, the notices of the direction would be served on relevant parties, and notification will also be made by local advertisement and site notices. The relevant parties on whom to serve notice include every owner and occupier in the area, unless it is difficult to locate them or the number makes service impracticable. It is considered that, with around 4,000 addresses within the area, service on every owner and occupier is impracticable. However, the Council will use other means to notify as many owners as possible, including through organisations representing existing businesses such as the Business Improvement District, Chamber of Commerce and Federation of Small Businesses. Notice must also be served on the Secretary of State.

4.2.8 There will be an opportunity for parties to make representations on the direction within a 21-day period following serving the last notice. These representations will be reported back to Policy Committee which will then need to consider whether to confirm the direction. Confirmation must take place no earlier than 28 days after serving the last notice. This is therefore expected to be considered by Committee again in December 2021 or January 2022.

4.2.9 Subject to confirmation the direction would come into force on 31st October 2022, unless modified or cancelled by the Secretary of State.

4.3 Other Options Considered

4.3.1 There are a number of alternative options that could be considered, as follows.

4.3.2 **Whole Borough Article 4 direction:** Applying an Article 4 direction to the whole Borough would be the only way to address all of the harmful effects as a result of the PDR. Matters such as the quality and size of the dwellings and

lack of contribution to affordable housing are applicable wherever these PDR developments are located. However, the July 2021 WMS has made clear that whole Borough Article 4 directions covering changes of use to residential are not expected, and it is not considered likely that a direction covering the whole of Reading Borough could be put in place without cancellation by the Secretary of State.

- 4.3.3 **More geographically limited Article 4 direction:** There are various potential approaches to a more geographically limited direction, but it is considered that the most likely version would cover the primary shopping area of the town centre, the key frontages within district and local centres and the core employment areas, all of which are defined in the Local Plan. This would cover around 238 ha, a 51% reduction on the proposed area, representing only around 6% of the Borough's total area. Whilst such a direction is less likely to result in intervention from the Secretary of State, it would not be anywhere near sufficient to cover all wholly unacceptable impacts. It would continue to result in loss of key employment space around the fringes of the town centre core, would place new residents in areas where they will be subject to high levels of noise and poor air quality, and would restrict the operation of existing businesses, as well as failing to make necessary contributions to affordable housing.
- 4.3.4 **Restricting class MA PDR only:** A more straightforward version of the Article 4 direction would deal with class MA only, which covers changes of use from commercial to residential. By far the majority of PDR schemes in Reading have come by this route (or from the PDR that this class replaced, including office to residential) and this is likely to continue to be the case. However, this would fail to recognise the potential impacts that some of the new PDR, only introduced in 2020, could have, as set out in the evidence document, and would continue to result in wholly unacceptable impacts from those forms of development even if they are more limited in number.
- 4.3.5 **Inclusion of upward extension of residential:** There are a number of forms of PDR that allow new dwellings to be created by upwards extension of existing dwellinghouses or blocks of flats. Whilst some of the issues that arise as a result of such PDR are similar (e.g. lack of affordable housing contribution, small size of dwellings), others are much less likely to apply, such as exposure to noise, loss of employment or retail floorspace and impacts on existing businesses. The issues are therefore very distinct, and the applicable geographical area is also therefore very different, so it does not make sense to cover these in the same direction. This does not prevent a future direction being put in place to cover these matters if required.
- 4.3.6 **Immediate Article 4 direction:** An immediate Article 4 direction would prevent relevant PDR from being undertaken with immediate effect, but would mean that the Council is potentially liable to pay compensation to affected landowners. Given the scale and scope of the direction and therefore the potential amount of affected landowners, this is considered to be an unacceptable risk.
- 4.3.7 **No Article 4 direction:** It is considered that the continued harm to the proper planning of the area, as demonstrated in the evidence document (Appendix 3) means that continuing without an Article 4 direction is not acceptable, particularly given recent extensions to PDR that put our high streets at

particular risk. It would mean continued poor quality housing that has a detrimental effect on the local economy, the health of centres and the quality of life of residents and which makes no contribution towards much-needed affordable housing. Some of the effects could be dealt with as part of the conditions of prior approval, but these are very limited in scope and the application fees for such approvals do not fully cover the cost of determining them.

5. CONTRIBUTION TO STRATEGIC AIMS

5.1 The Council's vision is as follows:

"To help Reading realise its potential - and to ensure that everyone who lives and works here can share the benefits of its success."

5.2 The recommended action helps to achieve the vision by ensuring that residents of new dwellings in Reading are not detrimentally affected by the poor quality or inappropriate mix of homes, and that development helps to realise Reading's potential through contributing to affordable housing, mitigating the impacts on infrastructure and securing economic growth.

5.3 The recommended action also contributes to the following Corporate Plan themes:

Healthy environment

- Ensuring that new development is subject to the Council's planning policies that seek to address the climate emergency through improved standards of new housing;
- Ensuring that new development is subject to policies that ensure adequate provision of outdoor amenity space and protection from high levels of noise and disturbance and poor air quality, thus helping to prevent impacts on physical and mental health.

Thriving Communities

- Ensuring that new developments contribute towards the provision of much-needed affordable housing;
- Ensuring that new development is subject to policies that secure high standards of accessibility and adaptability of new dwellings.

Inclusive economy

- Prevents developments that could negatively affect economic growth by eroding employment space or resulting in inappropriately located new homes that restrict the operations of existing businesses;
- Protects the health of Reading's high streets that provide a range of services and facilities for the whole community.

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

6.1 The Article 4 direction will not necessarily prevent development being undertaken, but will instead ensure that it is considered through the planning application process which will mean consideration against the full range of Local Plan policies and associated documents. As it stands, new-build residential development that benefits from PDR does not need to comply with policy H5 which requires zero carbon homes (defined as being, at a minimum,

a 35% improvement over the emissions rate in the building regulations with a contribution towards carbon offset to cover the remainder). Currently, other matters such as landscaping, tree planting, climate change adaptation and the impacts of poor air quality on residents of the development are unable to be considered for PDR proposals. The recommended action would therefore ensure that the adopted policies in the Local Plan apply, and as such the environmental and climate implications would be positive.

7. COMMUNITY ENGAGEMENT AND INFORMATION

7.1 Under the process set out in Schedule 3 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended), as soon as practicable after an Article 4 direction is made, notice must be served by local advertisement and at least two site notices within the area. Notice must also be served on the owner and occupier of every piece of land within the area to which the direction relates, unless individual service on that owner or occupier is impracticable because it is difficult to identify or locate that person, or unless the number of owners or occupiers within the area relates makes individual service impracticable. As set out in paragraph 4.2.6, it is considered that, with around 4,000 individual addresses within the proposed direction, individual service is impracticable, but other measures should be taken to reach as many businesses as possible.

7.2 The period for making representations must be at least 21 days from the date on which the last notice was served. It is proposed that the specified deadline should be Tuesday 30th November, to allow some flexibility in the timescale for serving the notices. Representations must be considered when making the decision whether to confirm the direction, and will therefore be reported back to Policy Committee once the period has closed and when the direction is brought back for confirmation.

8. EQUALITY ASSESSMENT

8.1 The Scoping Assessment, included at Appendix 1 identifies that an Equality Impact Assessment (EqIA) is relevant to this decision. The EqIA (also at Appendix 1) identifies that, where there are identified impacts upon specific groups, these are expected to be positive. Compliance with the duties under S149 of the Equality Act 2010 can involve treating some persons more favourably than others, but it is not considered that there will be a negative impact on other groups with relevant protected characteristics.

9. LEGAL IMPLICATIONS

9.1 The Town and Country Planning (General Permitted Development) Order 2015 (as amended) (known as the GPDO) grants planning permission to a number of specified forms of development. The forms of development for which permission is granted are set out in Schedule 2 of the GPDO.

9.2 Article 4 of the GPDO allows the local planning authority to make a direction that removes specified permitted development rights within a defined area if those rights would be prejudicial to proper planning of their area or constitute a threat to the amenities of the area. Schedule 3 of the GPDO describes the process by which these Article 4 directions are made. Paragraph 1 of Schedule 3 deals with non-immediate directions.

9.3 The Town and Country Planning Act 1990 is also relevant. Section 108 deals with compensation arrangements and is applicable to a situation where permitted development rights are removed. Section 108(3C)(c) states that at least 12 months' notice of the withdrawal is required to avoid the ability for compensation claims to be made.

10. FINANCIAL IMPLICATIONS

10.1 The costs of making the Article 4 direction will be met from the existing Planning service budget. These costs relate primarily to officer time and the cost of serving notices and local advertisements.

10.2 Making an Article 4 direction will result in the need for an application for planning permission rather than a prior approval process once the direction is in force. After changes to the law in 2017, there is no longer any exemption from planning application fees in an Article 4 direction area. Planning application fees will therefore be charged as permitted by Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2017.

10.3 The recommended action is therefore expected to mean an increase in planning fee income. Since the additional PDR were introduced in May 2013 in place of applications for full planning permission, the loss in fee income to the Council was estimated to be £1,639,242 up to July 2021. Fees for prior approvals for relevant developments have recently significantly increased, but still fall short of the equivalent planning application fee, and do not reflect the full costs of assessing the application, particularly as this frequently involves not only planning officer time but also the need for specialist advice on matters such as noise, contamination, transport and flood risk due to the increasing scope of prior approvals. A comparison of fees is set out in Table 1.

Table 1: Comparison of prior approval and planning application fees (September 2021)

Type of development	Prior approval fee	Planning application fee
Change of use from commercial to residential	£96 per dwelling	£462 per dwelling (up to 50 dwellings)
Change of use from betting shop, pay day loan shop, launderette, takeaway, casino, amusement arcade to residential	£96 total (unless there are building operations)	£462 per dwelling (up to 50 dwellings)
Construction of new dwellinghouses	£334 per dwelling (up to 50 dwellings)	£462 per dwelling (up to 50 dwellings)

10.4 The recommended action will also mean that, as a planning application will be required to which the Council's adopted planning policies will be applied, a Section 106 agreement is likely to be necessary for most permissions. Up to now, developments subject to prior approval have not included such agreements which has meant that no contributions have been made to affordable housing (either on-site provision or off-site financial contributions). There was also therefore no mechanism for securing other

financial contributions towards matters such as employment and skills plans, or other site-specific infrastructure contributions such as transport, education and leisure (although these matters are usually covered by CIL which remains equally applicable to permitted development). These matters are explored in more detail in the evidence document (Appendix 3).

- 10.5 The proposed Article 4 direction will affect the permitted development rights that can be applied to the Council's own assets. It is not possible to specifically quantify the impacts as a result of the proposed direction, and it is certainly the case that the Council has to date rarely made use of the PDR dealt with in this report. It is worth noting that the Article 4 direction does not prevent changes of use to, or development for, residential, it merely ensures that such developments are considered through a planning application process.

Value for Money (VFM)

- 10.6 Making an Article 4 direction would ensure that the full range of planning implications of the specified forms of development can be considered during a planning application process to which adequate application fees apply and which make relevant contributions to affordable housing and local infrastructure, and therefore represents good value for money.

Risk Assessment

- 10.7 The only financial risks associated with this report would be in the event that the Secretary of State modifies or cancels this direction, the Council may need to revise the Article 4 direction and serve relevant notices again. These costs would need to be met from the existing Planning Service budget.

BACKGROUND PAPERS

- Town and Country Planning (General Permitted Development) Order 2015 (as amended)
- Reading Borough Council evidence to Housing, Communities and Local Government Inquiry on Permitted Development Rights
- National Planning Policy Framework
- Planning Practice Guidance
- Housing, Communities and Local Government Committee report on Permitted Development Rights, July 2021

APPENDIX 1: EQUALITY IMPACT ASSESSMENT

Provide basic details

Name of proposal/activity/policy to be assessed:

Article 4 direction to remove permitted development rights that would result in residential development

Directorate: DEGNS - Directorate of Economic Growth and Neighbourhood Services

Service: Planning

Name: Mark Worringham

Job Title: Planning Policy Team Leader

Date of assessment: 19/08/2021

Scope your proposal

What is the aim of your policy or new service?

To put in place a legal direction to remove certain permitted development rights in parts of Reading to include the town centre, district and local centres and employment and commercial areas.

Who will benefit from this proposal and how?

This proposal will benefit the whole community (including potential occupants of development) by ensuring that developments that would result in new dwellings are subject to a planning application process that ensures that impacts on the amenity of the area are considered.

What outcomes will the change achieve and for whom?

The main outcome will be that developments that would result in residential development are subject to a planning permission process. This will consider all of the many impacts on the amenity of the area and on the potential residents.

Who are the main stakeholders and what do they want?

Potential residents - a residential dwelling which does not detrimentally impact quality of life and physical and mental health.

Neighbouring residents - developments that do not detrimentally affect the residential amenity of the area

Neighbouring businesses - developments that do not detrimentally impact their operation.

Developers and landowners - planning processes that offer flexibility and/or provide certainty.

Whole community - developments that contribute towards meeting affordable housing needs and mitigating infrastructure impacts.

Assess whether an EIA is Relevant

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

Do you have evidence or reason to believe that some (racial, disability, gender, sexuality, age and religious belief) groups may be affected differently than others? (Think about your monitoring information, research, national data/reports etc)
Yes No

Is there already public concern about potentially discriminatory practices/impact or could there be? Think about your complaints, consultation, feedback.
Yes No

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

If **No** you **MUST** complete this statement

N/A

Assess the Impact of the Proposal

Your assessment must include:

- **Consultation**
- **Collection and Assessment of Data**
- **Judgement about whether the impact is negative or positive**

Consultation

Relevant groups/experts	How were/will the views of these groups be obtained	Date when contacted
Landowners	Local advertisement, site notice	October 2021

Collect and Assess your Data

Describe how could this proposal impact on Racial groups
No specific impacts are identified.
Is there a negative impact? Yes No Not sure

Describe how could this proposal impact on Gender/transgender (cover pregnancy and maternity, marriage)
No specific impacts are identified.
Is there a negative impact? Yes No Not sure

Describe how could this proposal impact on Disability

New dwellings provided as a result of permitted development rights do not need to comply with the housing standards set out in policy H5 of the Local Plan. This policy ensures that all new-build homes are to be accessible and adaptable (to ensure that adaptations can be made to a home as residents' life circumstances change), and that 5% of homes on developments of 20 or more dwellings are wheelchair accessible and adaptable. This means that developments through permitted development are unlikely to provide dwellings that meet these standards. The result of the recommended action will be to ensure that compliance with these standards is a condition of receiving permission, and will therefore represent a positive impact in disability.

Is there a negative impact? Yes No Not sure

Describe how could this proposal impact on Sexual orientation (cover civil partnership)

No specific impacts are identified.

Is there a negative impact? Yes No Not sure

Describe how could this proposal impact on Age

No specific impacts are identified.

Is there a negative impact? Yes No Not sure

Describe how could this proposal impact on Religious belief?

No specific impacts are identified.

Is there a negative impact? Yes No Not sure

Make a Decision

Tick which applies

1. **No negative impact identified** Go to sign off
2. **Negative impact identified but there is a justifiable reason**

You must give due regard or weight but this does not necessarily mean that the equality duty overrides other clearly conflicting statutory duties that you must comply with.
Reason
3. **Negative impact identified or uncertain**

What action will you take to eliminate or reduce the impact? Set out your actions and timescale?

How will you monitor for adverse impact in the future?

Compliance with accessibility requirements will be a condition of receiving planning permission, and this will be capable of being monitored on an annual basis.

Signed (completing officer)	Mark Worringham	Date: 19 th August 2021
Signed (Lead Officer)	Mark Worringham	Date: 19 th August 2021

This page is intentionally left blank

APPENDIX 2: DRAFT ARTICLE 4 DIRECTION

TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 2015 (AS AMENDED)

DIRECTION MADE UNDER ARTICLE 4(1) TO WHICH SCHEDULE 3 APPLIES

WHEREAS Reading Borough Council being the appropriate local planning authority within the meaning of article 4(5) of the Town and Country Planning (General Permitted Development) Order 2015 (as amended), are satisfied that it is expedient that development of the description(s) set out in the Schedule below should not be carried out on the land shown edged black on the attached plans, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990 as amended,

NOW THEREFORE the said Council in pursuance of the power conferred on them by article 4(1) of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) hereby direct that the permission granted by article 3 of the said Order shall not apply to development on the said land of the descriptions set out in the Schedule below:

SCHEDULE

The Article 4 Direction applies within the areas shown edged red on the attached plans, being development comprised within Classes M, MA and N of Part 3 of Schedule 2 and Classes ZA, AA, and AB of Part 20 of Schedule 2 to the said Order and its amendments and not being development comprised within any other Class:

Part 3, Class MA:

Development consisting of a change of use of a building and any land within its curtilage (excluding any building or land in relation to which prior approval under paragraphs M.2, MA.2, O.2 or PA.2 of Part 3 of Schedule 2 to the 2015 Order has been granted, or under the terms of that Part is treated as granted, before 23 September 2021, and had not expired by 23 September 2021) from a use falling within Class E (commercial, business and service) of Schedule 2 to the Use Classes Order to a use falling within Class C3 (dwellinghouses) of Schedule 1 to that Order.

Part 3, Class M:

Development consisting of—

- (a) a change of use of a building from—
 - (i) a use falling within one of the following—
 - (aa) launderette;
 - (bb) betting office;
 - (cc) payday loan shop;
 - (dd) hot food takeaway; or

- (ii) a mixed use combining use as a dwellinghouse with a use falling within one of the uses mentioned in paragraph (i)(aa), (bb) or (cc) (whether that use was granted permission under Class G of this Part or otherwise);
to a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order; or
- (b) development referred to in paragraph (a) together with building operations reasonably necessary to convert the building to a use falling within Class C3 (dwellinghouses).

Part 3, Class N:

Development consisting of—

- (a) a change of use of a building and any land within its curtilage from a use as—
 - (i) an amusement arcade or centre, or
 - (ii) a casino,
(excluding any building or land in relation to which prior approval under paragraph N.2 of Part 3 of Schedule 2 to the 2015 Order has been granted, or under the terms of that Part is treated as granted, before 23 September 2021, and had not expired by 23 September 2021)
to a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order;
- (b) development referred to in paragraph (a) together with building operations reasonably necessary to convert the building referred to in paragraph (a) to a use falling within Class C3 (dwellinghouses) of that Schedule.

Part 20, Class ZA:

(1) Development consisting of works for the demolition of one or other of -

- (a) any building comprising a single purpose-built detached block of flats, and
- (b) any other single detached building, comprising premises established—
 - (i) for office use falling within Class B1(a) of the Schedule to the 1987 Order,
 - (ii) for research and development falling within Class B1(b) of the Schedule to the 1987 Order, or
 - (iii) for an industrial process falling within Class B1(c) of the Schedule to the 1987 Order,

or for any combination of them existing on 12 March 2020 (excluding any building or land in relation to which prior approval under paragraph ZA.2 of Part 20 of Schedule 2 to the 2015 Order has been granted, or under the terms of that Part is treated as granted, before 23 September 2021, and had not expired by 23 September 2021), together with its replacement by a single building covered by sub-paragraph (2), involving operations listed in sub-paragraph (3).

(2) The building in question is to comprise one or other of—

- (a) a purpose-built detached block of flats, or

- (b) a purpose-built detached dwellinghouse.
- (3) The operations in question are—
- (a) operations reasonably necessary for the demolition and construction, which may include the installation of a basement or cellar in the new building, whether or not there is one in the old building;
 - (b) works for the removal of plant servicing the old building;
 - (c) works for the disconnection of services from the old building;
 - (d) works for the removal of any means of access to and egress from the old building;
 - (e) works for the removal of storage and waste from the old building;
 - (f) works for the installation of plant to service the new building;
 - (g) works for the installation of services to be connected to the new building;
 - (h) works to enable access to and egress from the new building, including means of escape from fire;
 - (i) works for the construction, within the new building, of storage, waste or other ancillary facilities to support the new building;
 - (j) the use of scaffolding and other temporary structures to support the operations listed in paragraphs (a) to (i) over a period—
 - (i) starting with their installation no earlier than one month before the beginning of those operations, and
 - (ii) ending with their removal no later than one month after the completion of those operations.

(4) In relation to Class ZA—

“development” includes any change of use from the use of the old building to the use of the new building within Class C3 of the Schedule to the 1987 Order;

“the 1987 Order” means the Use Classes Order as in force on 12 March 2020; “the old building” and “the new building” respectively mean the building proposed for demolition and the building proposed as replacement; and “services” means water, drainage, electricity, gas, and other services to the extent reasonably necessary for the new building to function as the building in question as defined by sub-paragraph (2) above.

Part 20, Class AA

(1) Development consisting of works for the construction of up to two additional storeys of new dwellinghouses immediately above the topmost storey on a detached building to which sub-paragraph (2) applies, together with any or all—

- (a) engineering operations reasonably necessary to construct the additional storeys and new dwellinghouses;
- (b) works for the replacement of existing plant or installation of additional plant on the roof of the extended building reasonably necessary to service the new dwellinghouses;

- (c) works for the construction of appropriate and safe access to and egress from the new dwellinghouses and existing premises in the building, including means of escape from fire, via additional external doors or external staircases;
- (d) works for the construction of storage, waste or other ancillary facilities reasonably necessary to support the new dwellinghouses.

(2) This sub-paragraph applies to a building which is—

- (a) used for any purpose within Class A1 (shops), Class A2 (financial and professional services), Class A3 (restaurants and cafes) or Class B1(a) (offices) of the Schedule to the 1987 Order, or as a betting office, pay day loan shop or launderette;
- (b) in a mixed use combining—
 - (i) two or more uses within paragraph (a); or
 - (ii) a use falling within Class C3 (dwellinghouses) of the Schedule to the 1987 Order, together with one or more uses within paragraph (a).

(3) In relation to Class AA, “the 1987 Order” means the Use Classes Order as in force on 5th March 2018.

(excluding any building or land in relation to which prior approval under paragraph AA.2 of Part 20 of Schedule 2 to the 2015 Order has been granted, or under the terms of that Part is treated as granted, before 23 September 2021, and had not expired by 23 September 2021)

Part 20, Class AB

(1) Development consisting of works for the construction of new dwellinghouses immediately above the topmost storey on a terrace building to which sub-paragraph(2) applies, where that development comprises—

- (a) up to two additional storeys, in the case of an existing building consisting of two or more storeys;
- (b) one additional storey, in the case of an existing building consisting of one storey,

together with any development under sub-paragraph (3).

(2) This sub-paragraph applies to a building which is—

- (a) used for any purpose within Class A1 (shops), Class A2 (financial and professional services), Class A3 (restaurants and cafes) or Class B1(a) (offices) of the Schedule to the 1987 Order, or as a betting office, pay day loan shop or launderette;
- (b) in a mixed use combining—
 - (i) two or more uses within paragraph (a); or
 - (ii) a use falling within Class C3 (dwellinghouses) of the Schedule to the 1987 Order, together with one or more uses within paragraph (a).

(3) Development consisting of any or all—

- (a) engineering operations reasonably necessary to construct the additional storeys and new dwellinghouses;
- (b) works for the replacement of existing plant or installation of additional plant on the roof of the extended building reasonably necessary to service the new dwellinghouses;
- (c) works for the construction of appropriate and safe access to and egress from the new dwellinghouses and existing premises, including means of escape from fire, via additional external doors or external staircases;
- (d) works for the construction of storage, waste or other ancillary facilities reasonably necessary to support the new dwellinghouses.

(4) In relation to Class AB, “the 1987 Order” means the Use Classes Order as in force on 5th March 2018.

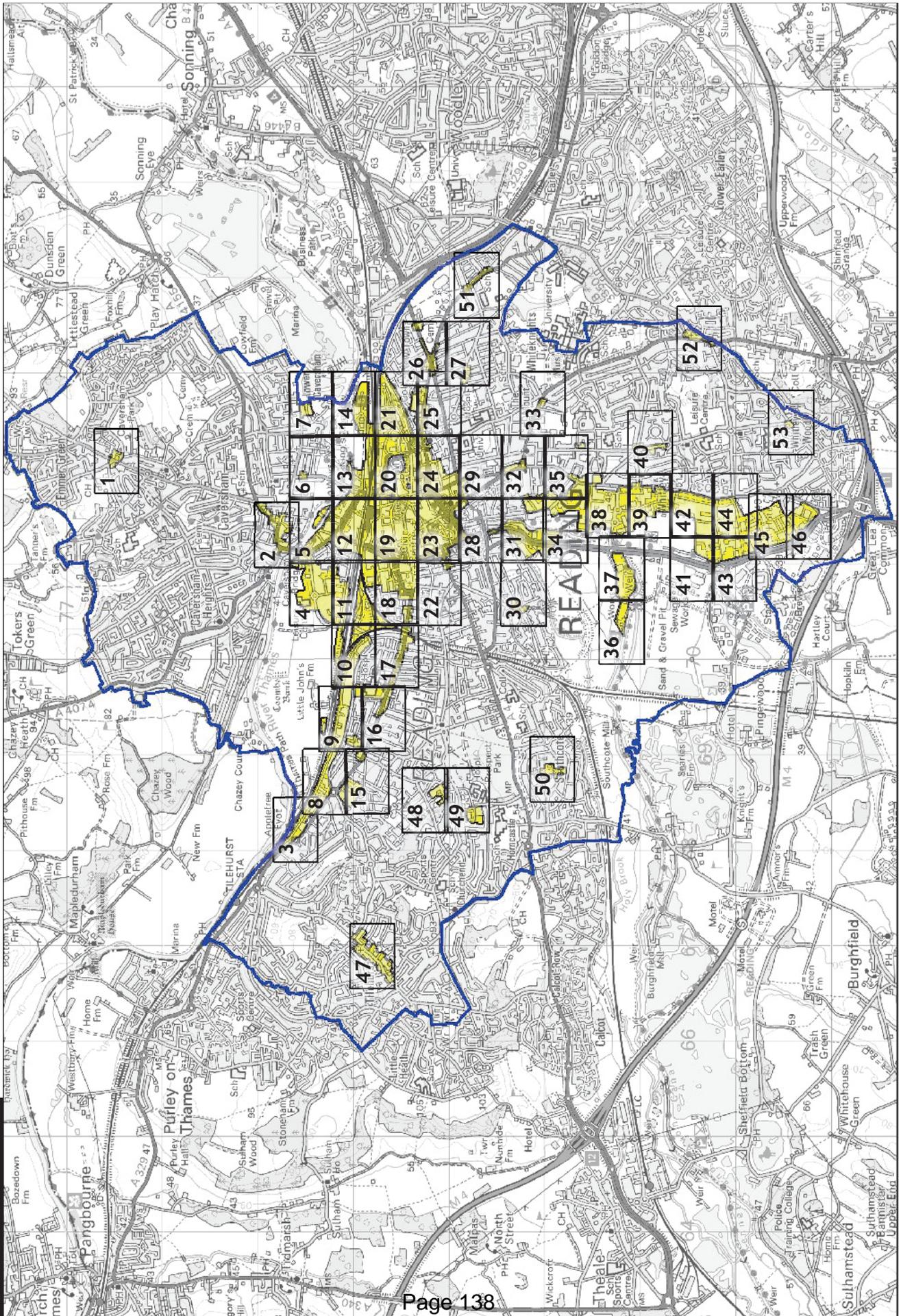
(excluding any building or land in relation to which prior approval under paragraph AB.2 of Part 20 of Schedule 2 to the 2015 Order has been granted, or under the terms of that Part is treated as granted, before 23 September 2021, and had not expired by 23 September 2021)

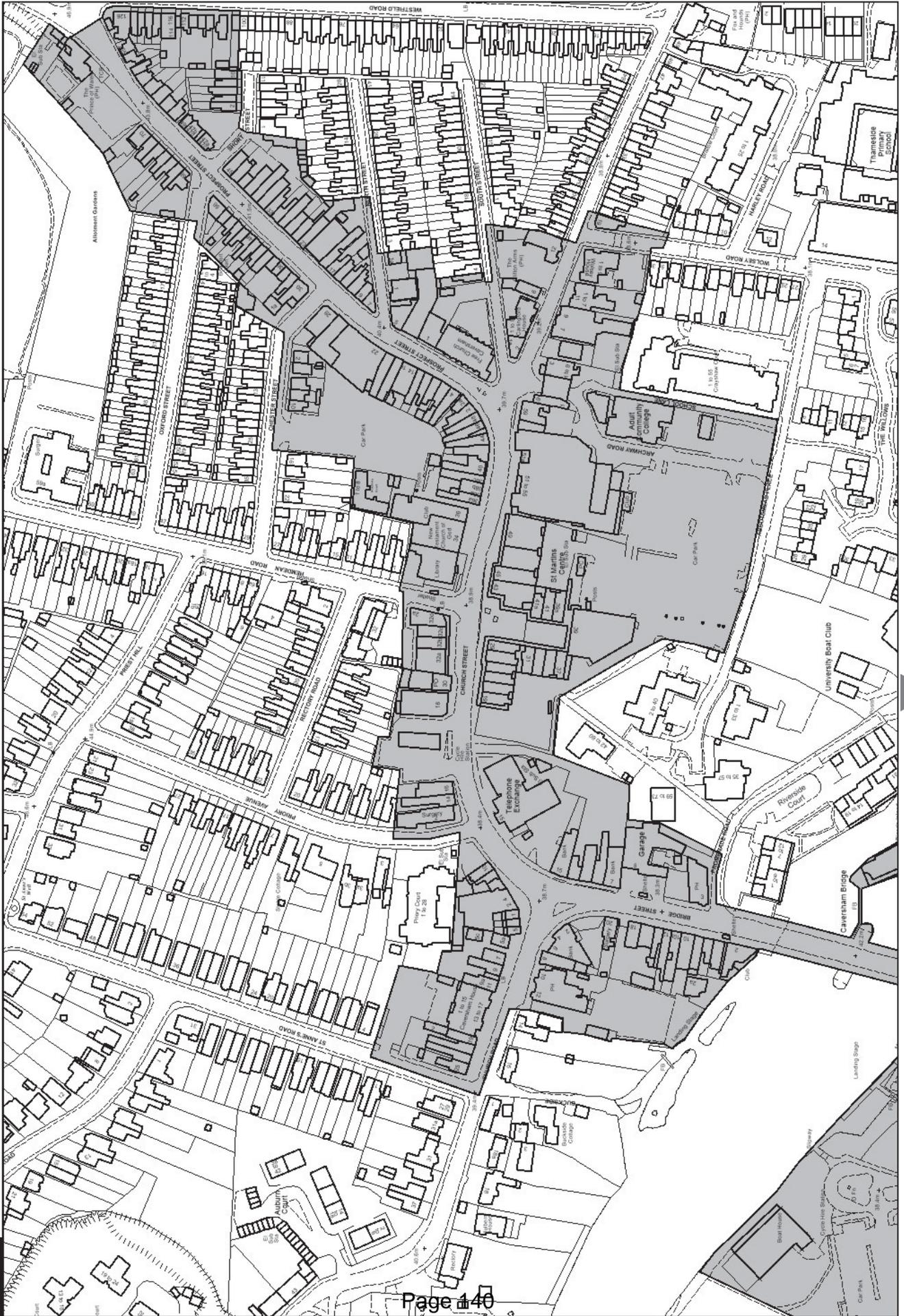
THIS DIRECTION comes into force on 31 October 2022

Made under the Common Seal of
Reading Borough Council this
27th day of September 2021.

The Common Seal of the Council
was affixed to this Direction in
the presence of

.....
.....





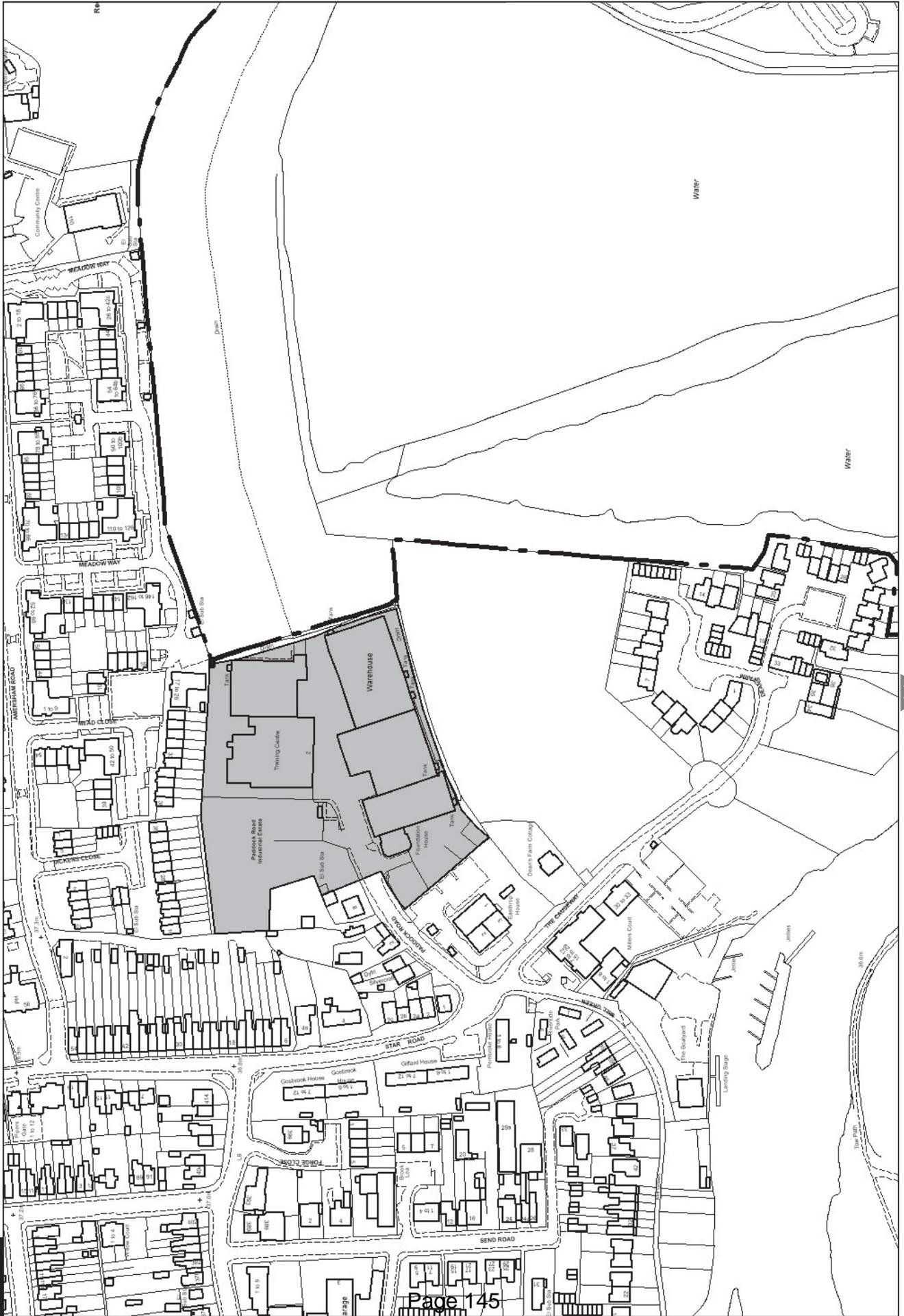




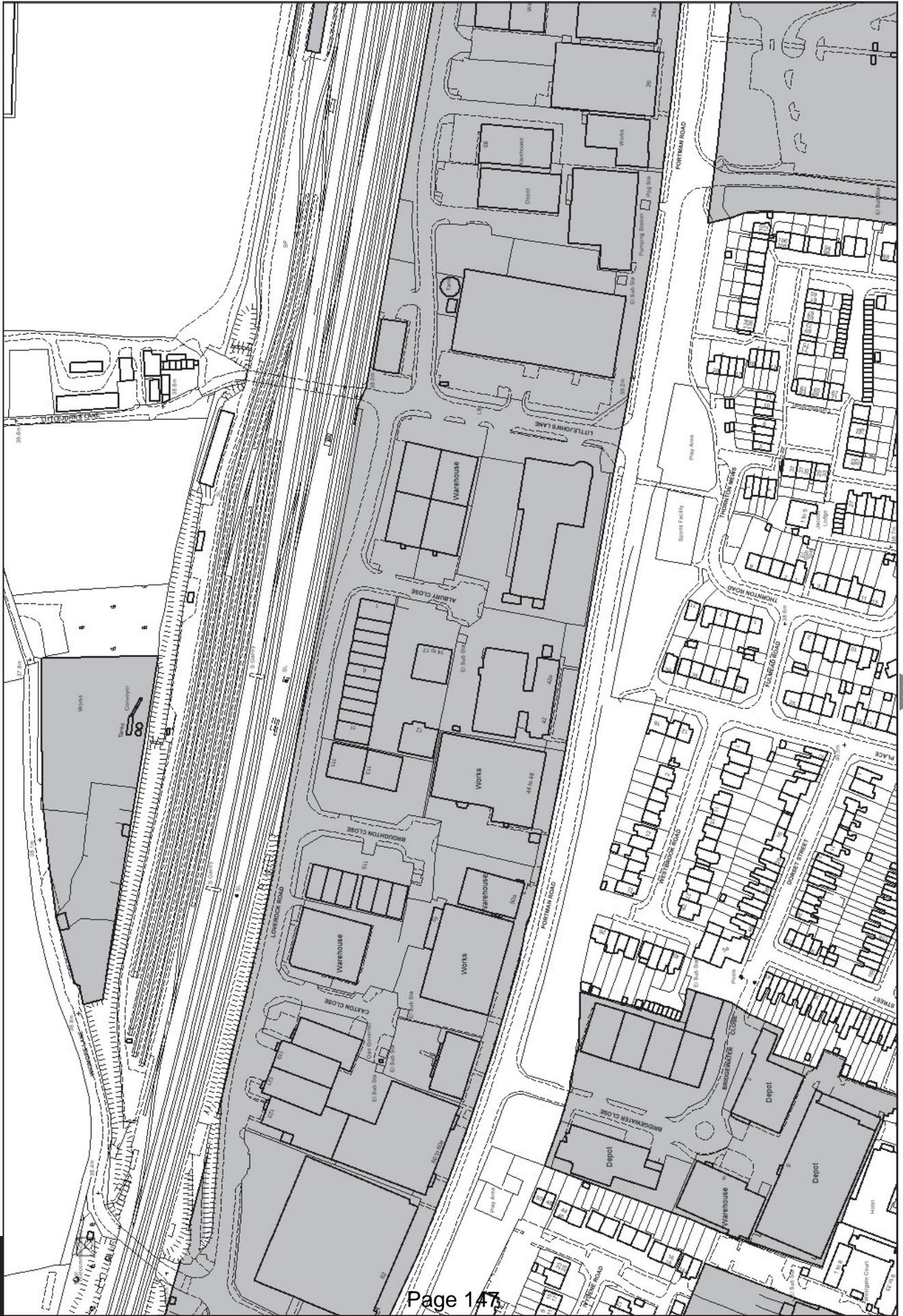
7

13

5







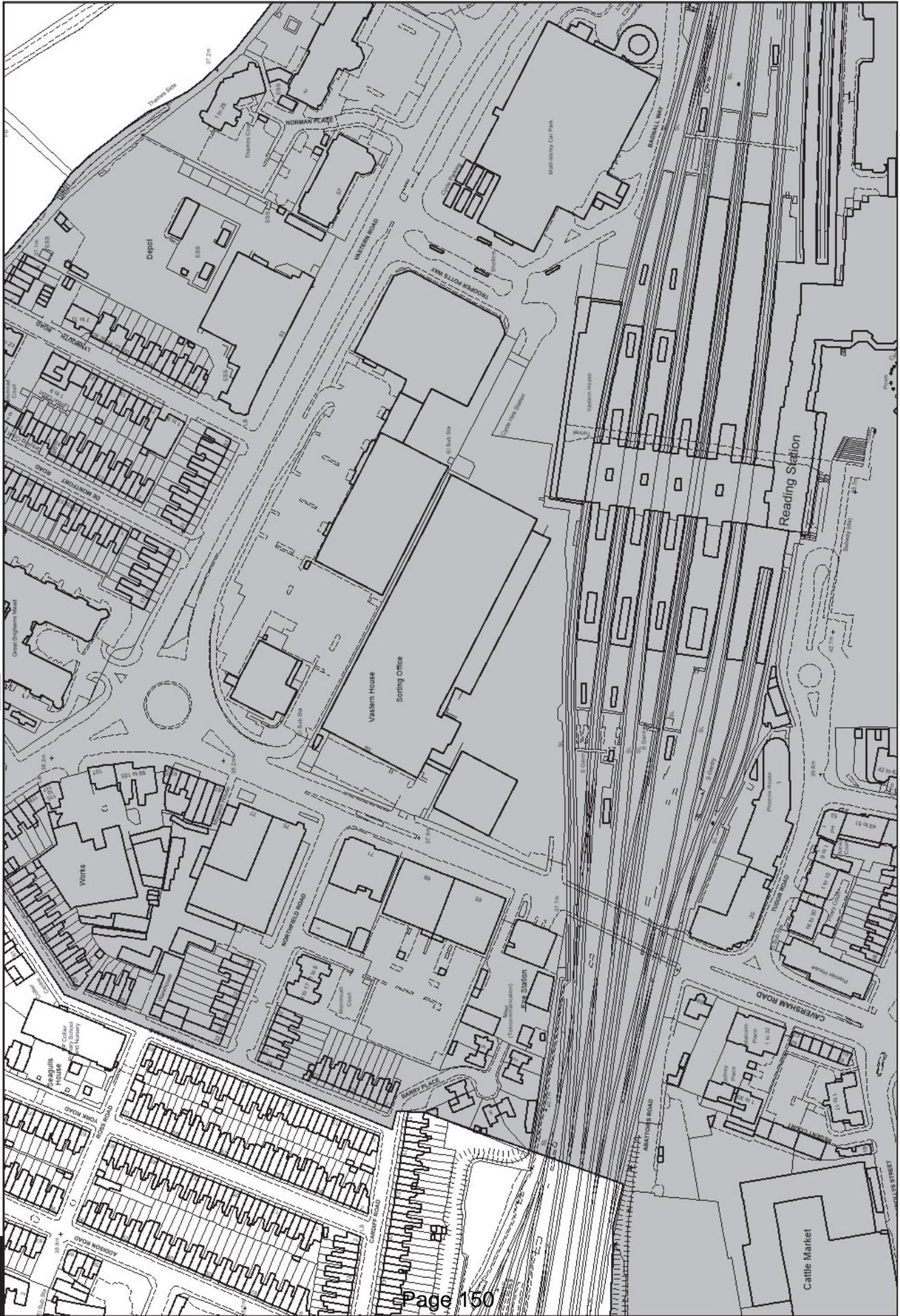
8

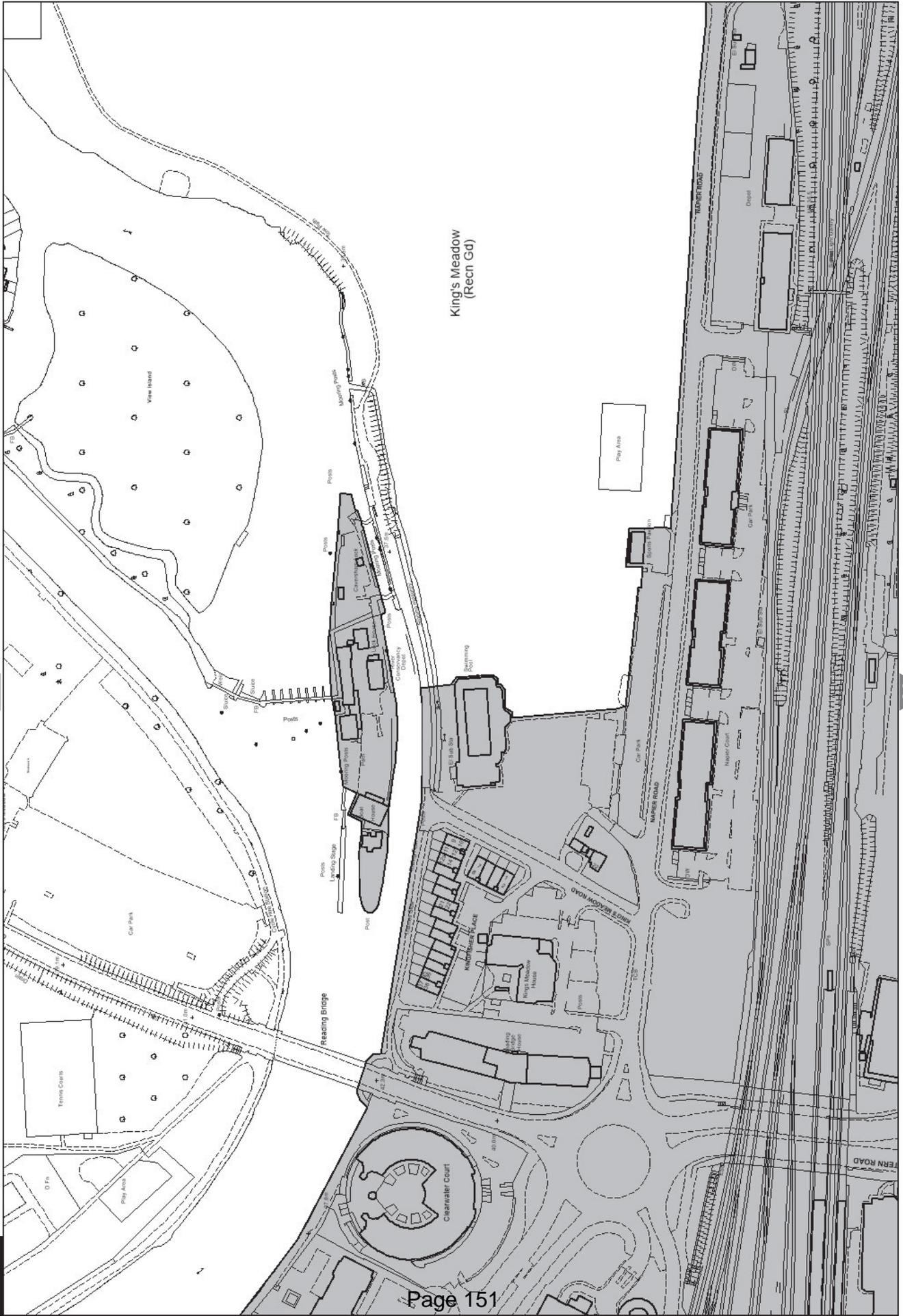
15

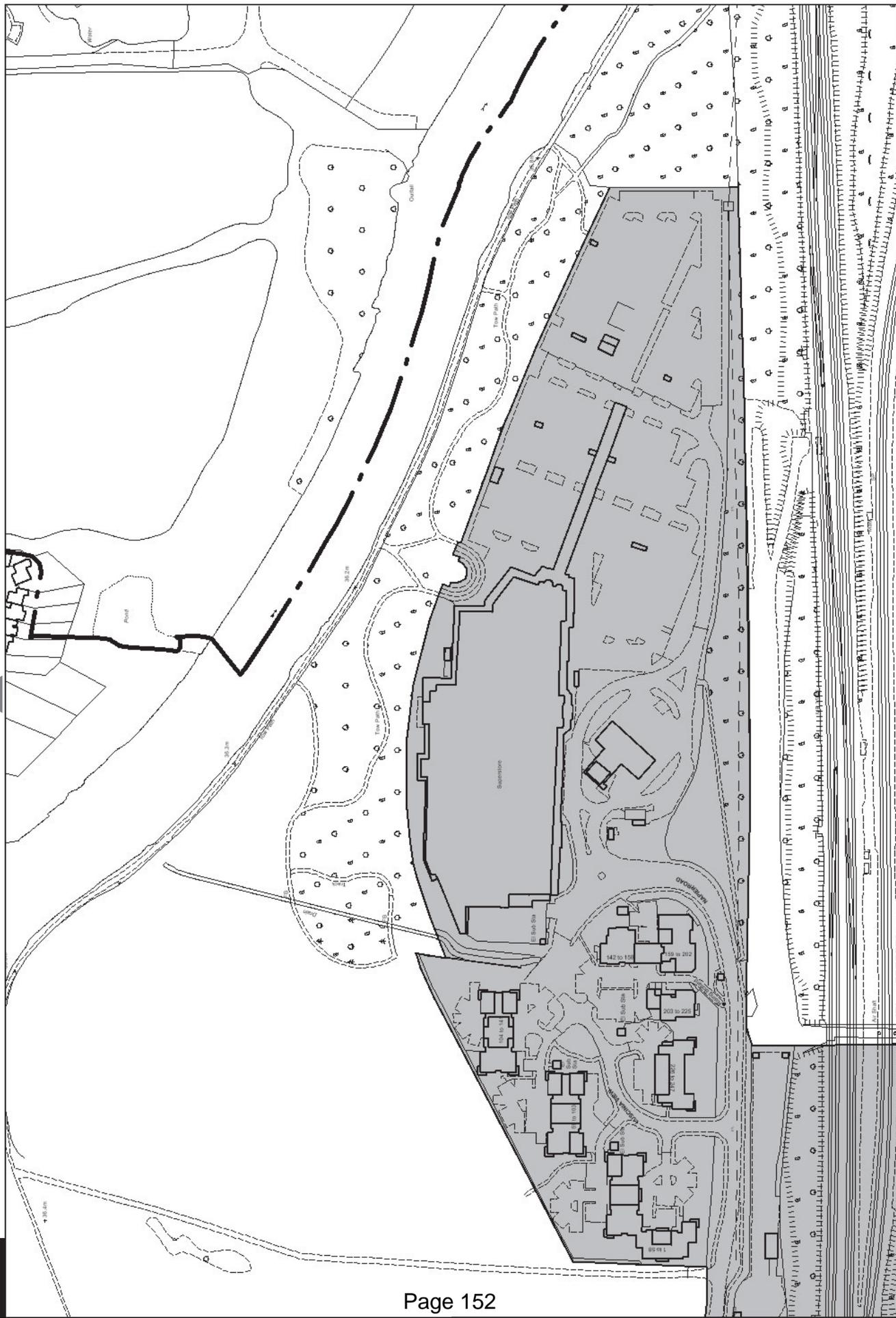
16

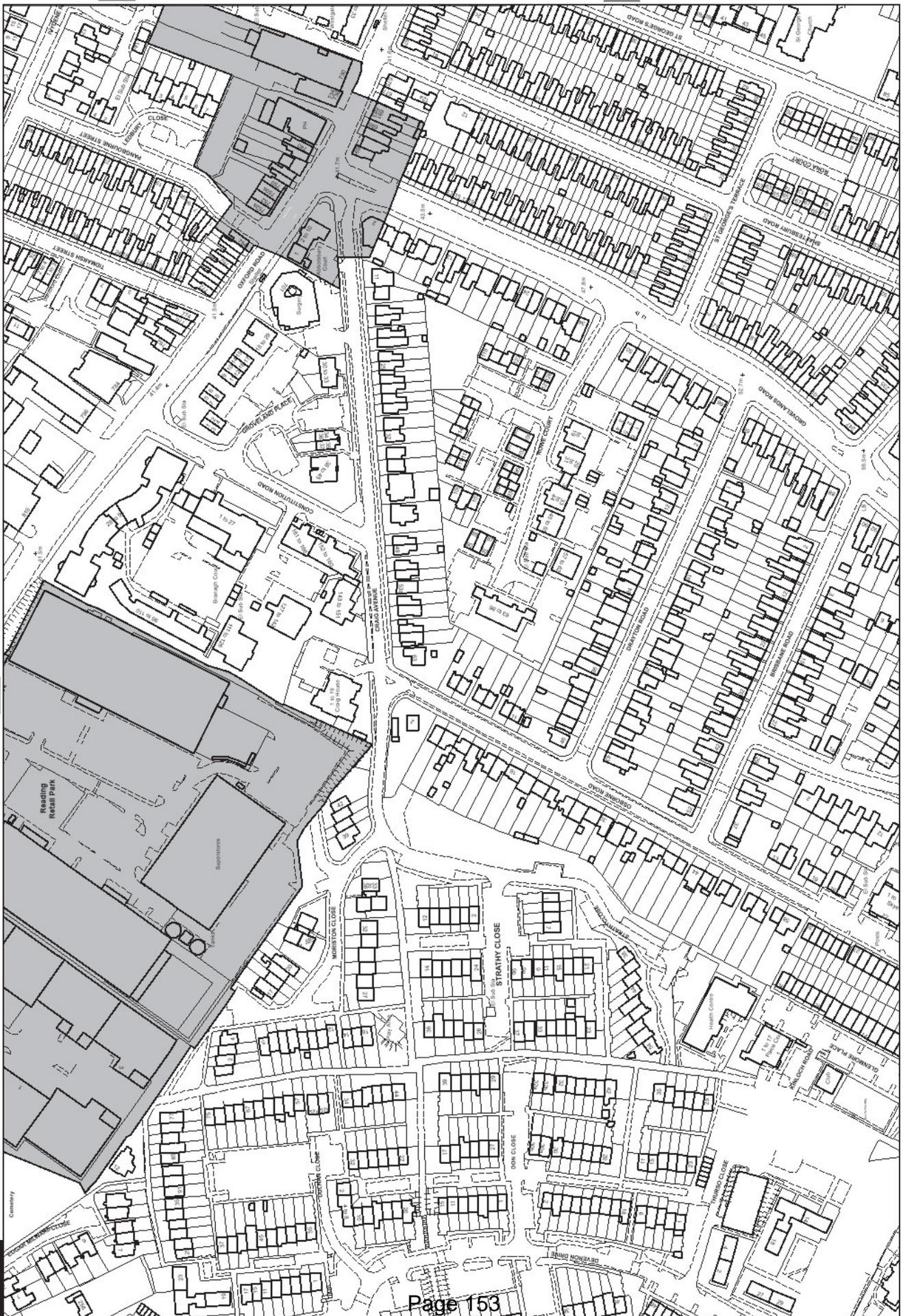
10







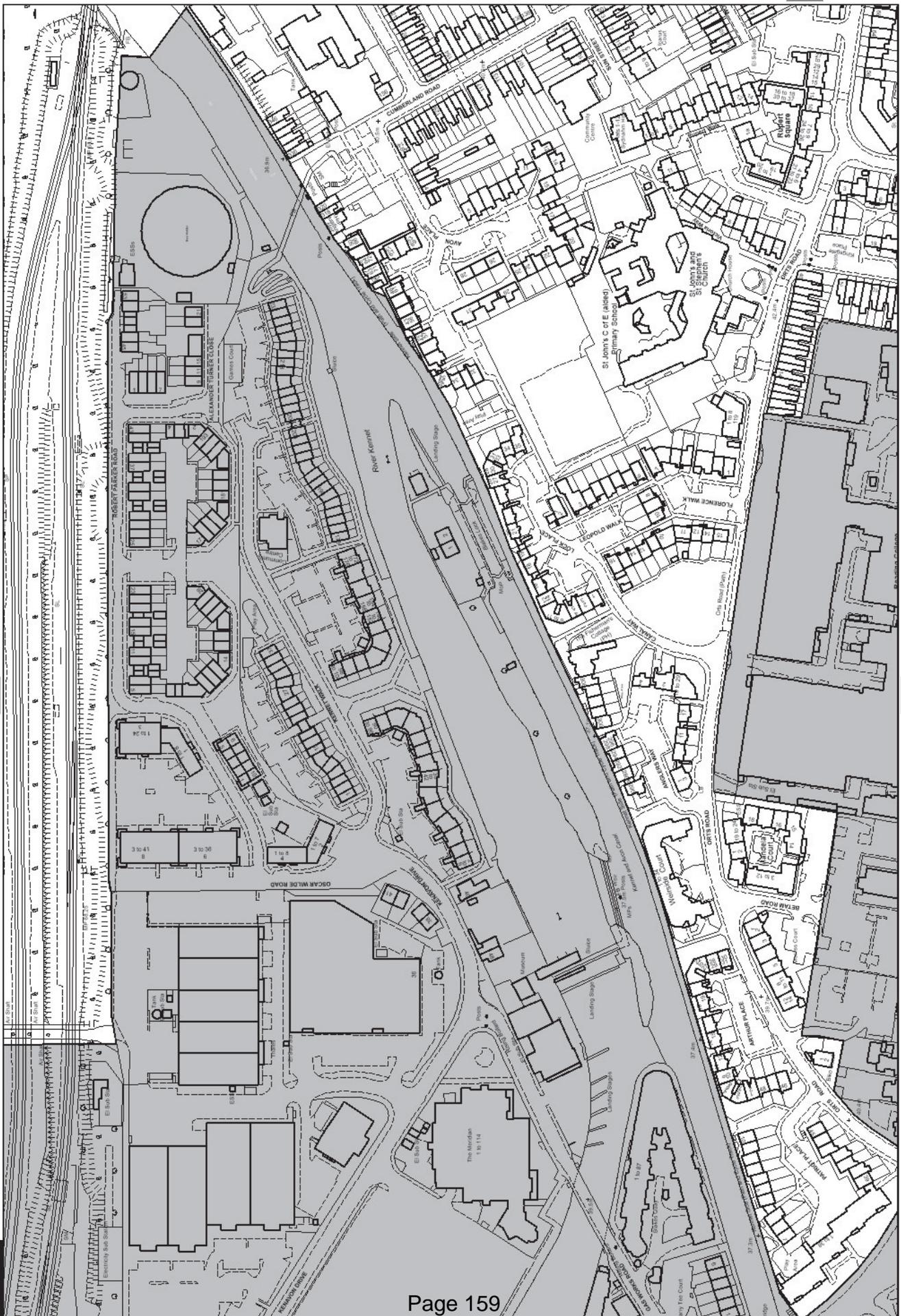


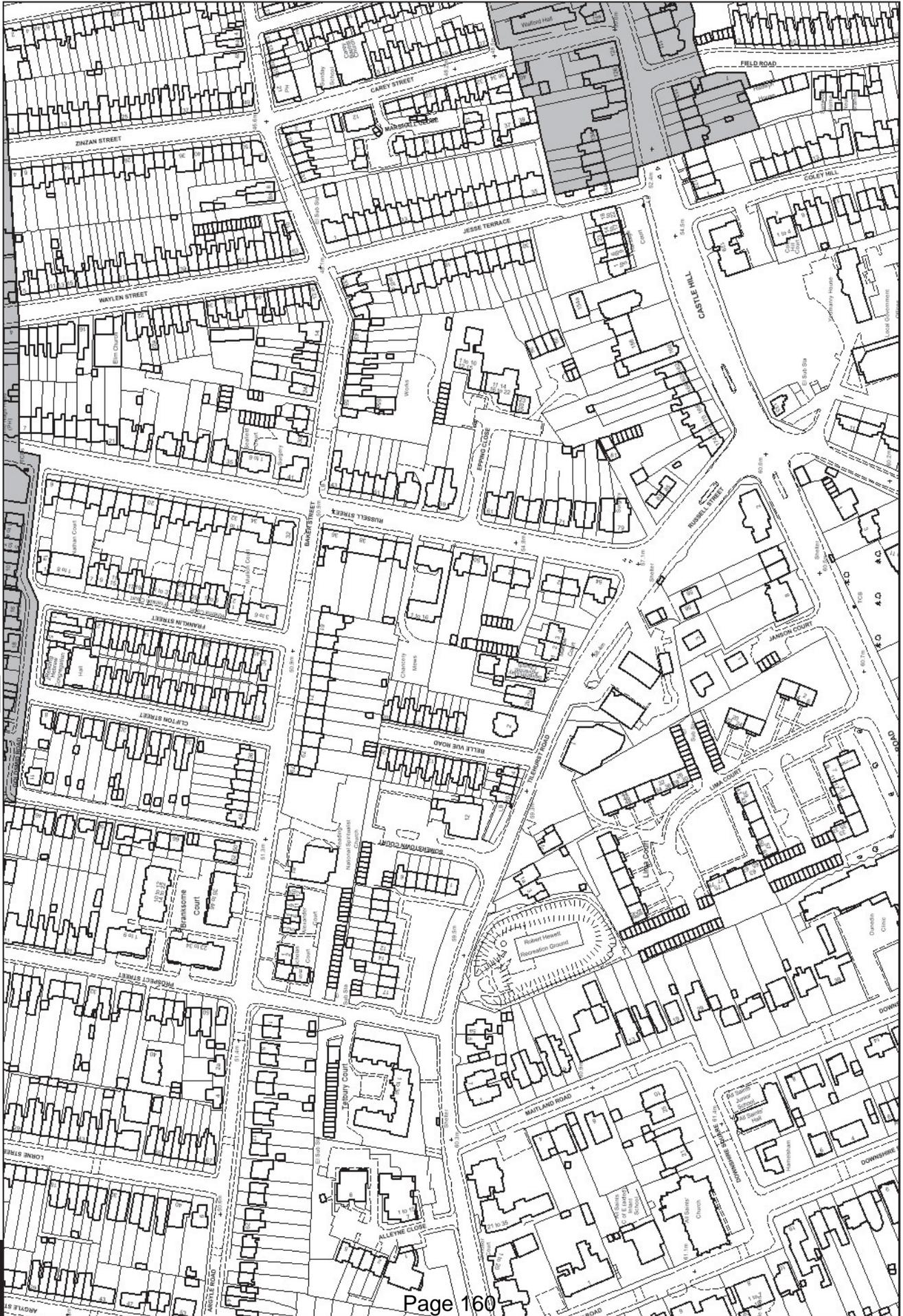






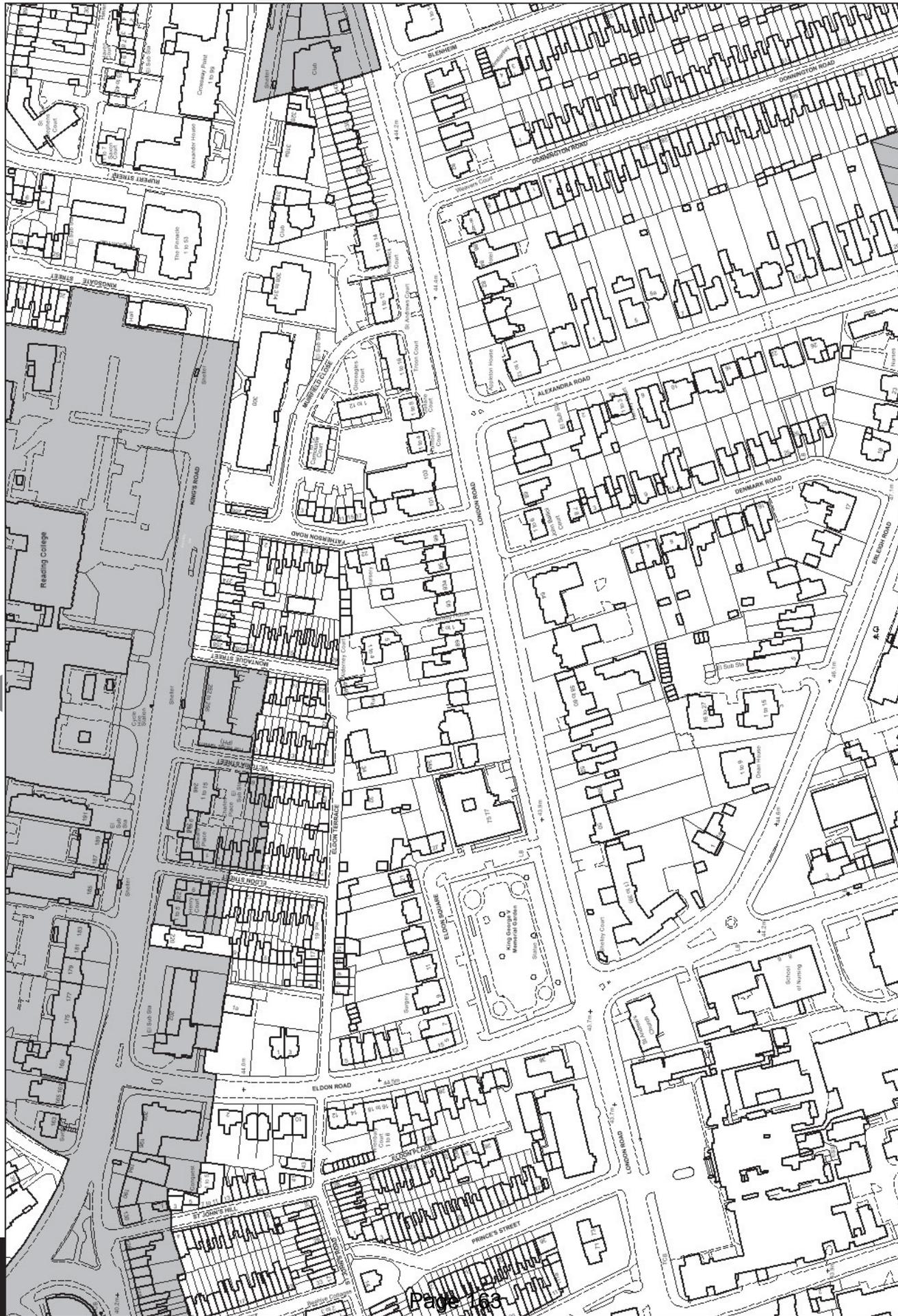


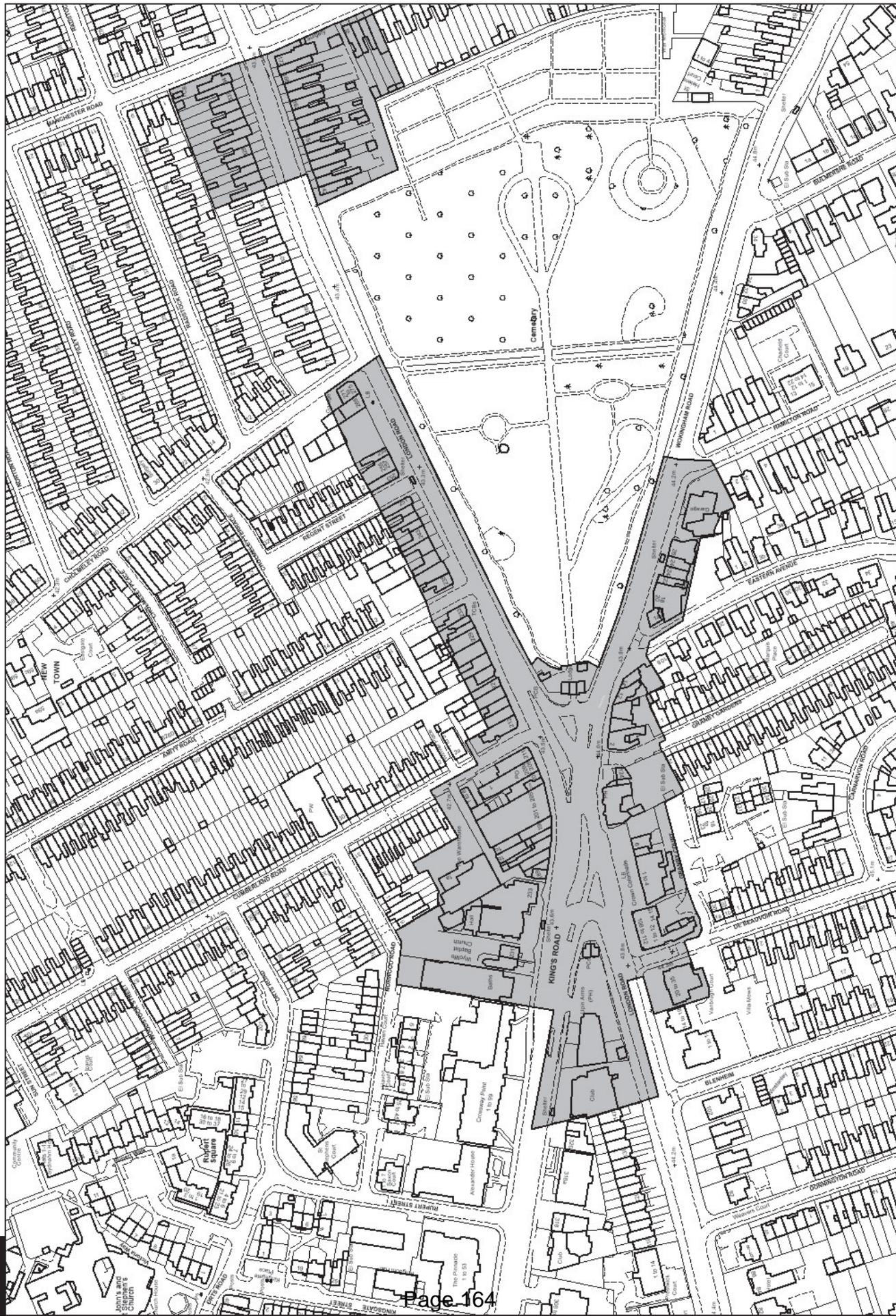


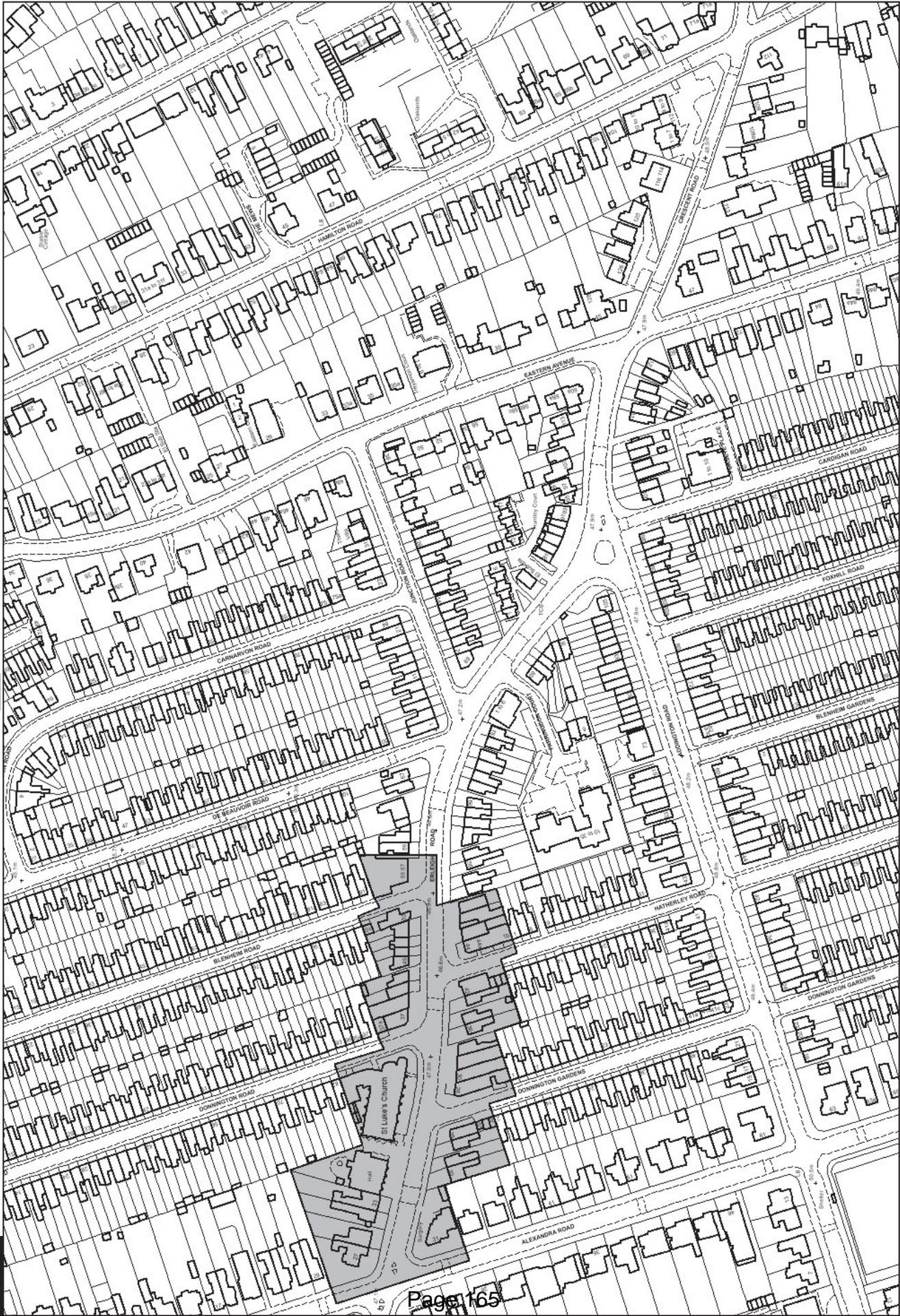












26

Map 27

25

Page 165

Scale 1:2500

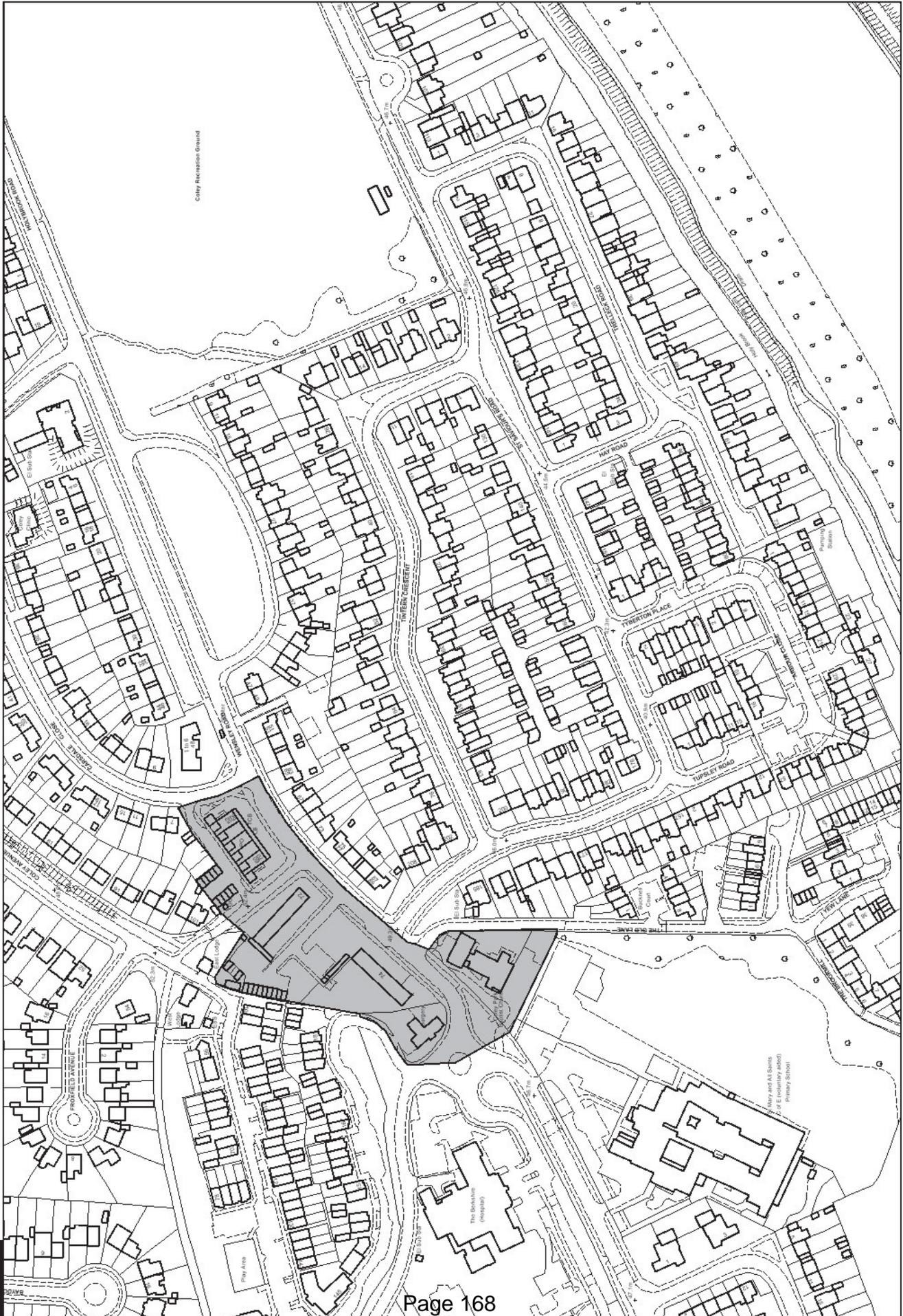


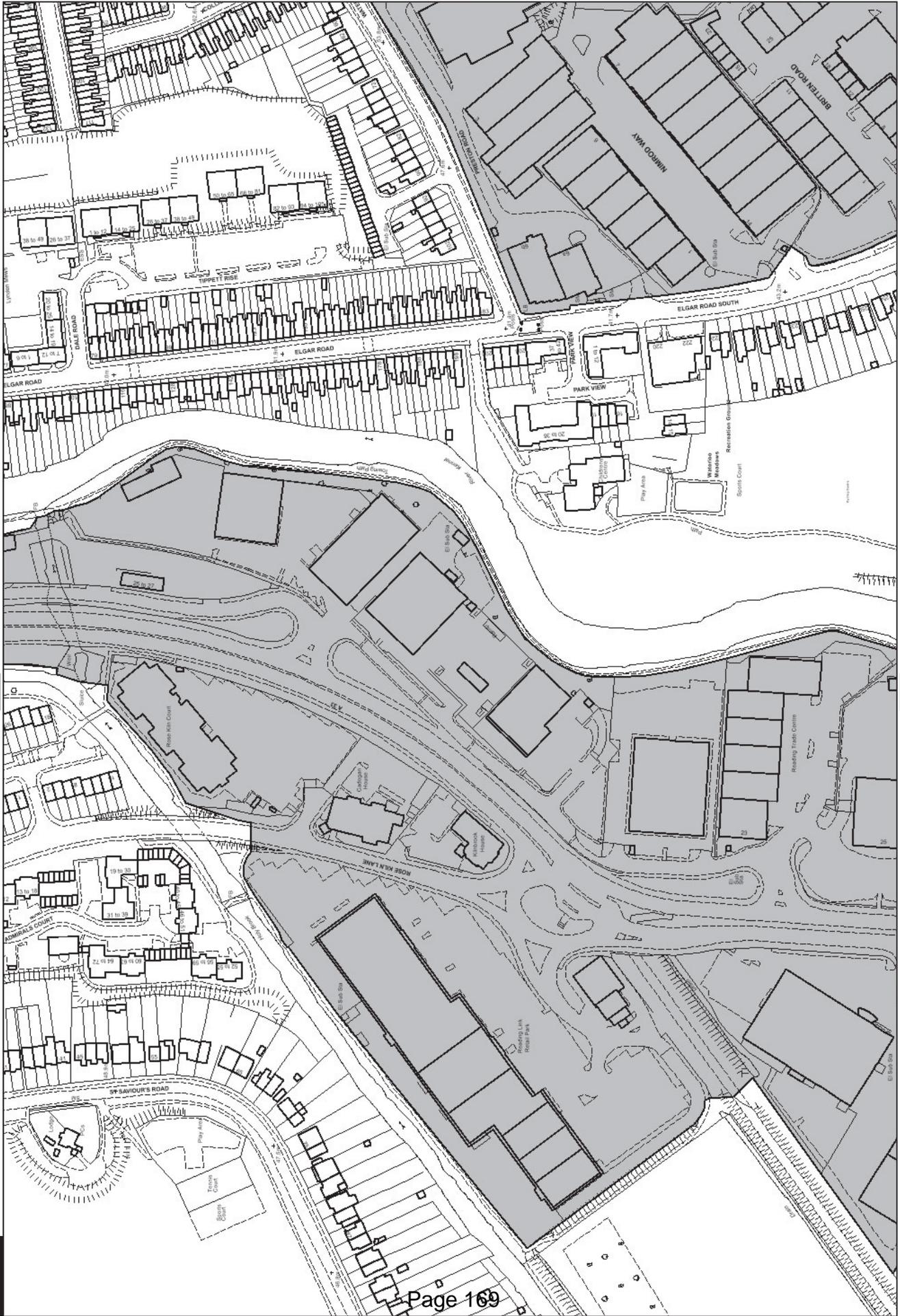


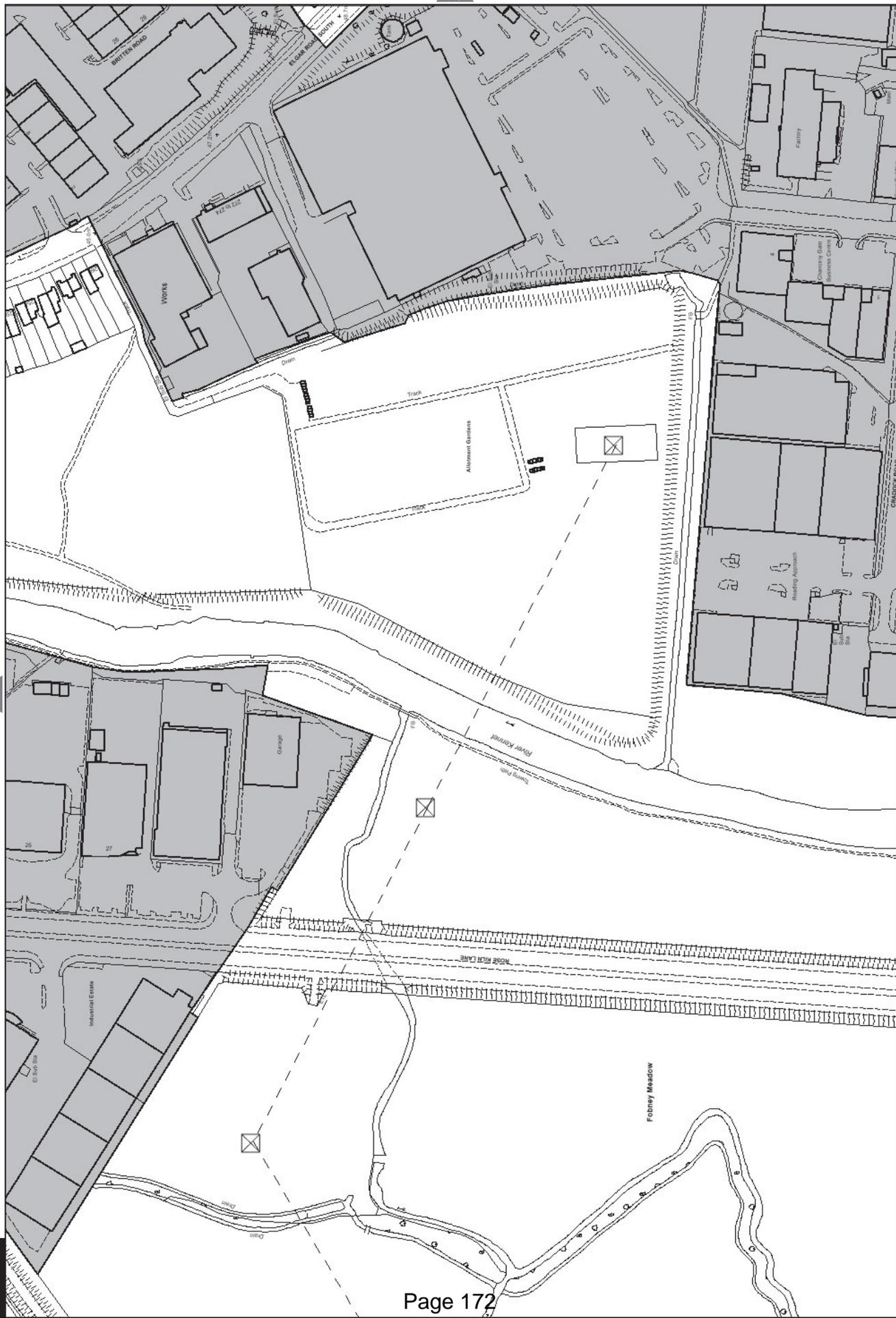
24

32

28



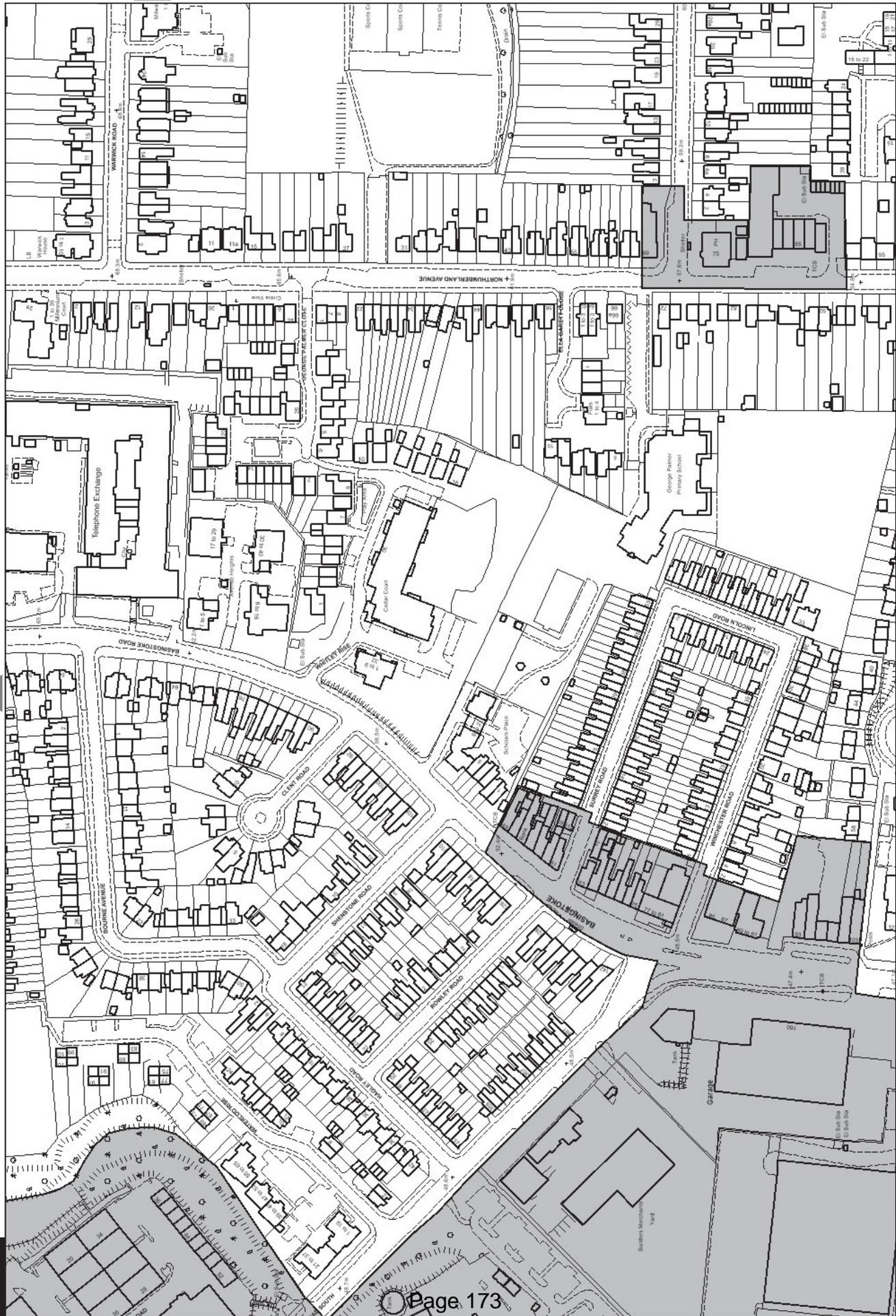




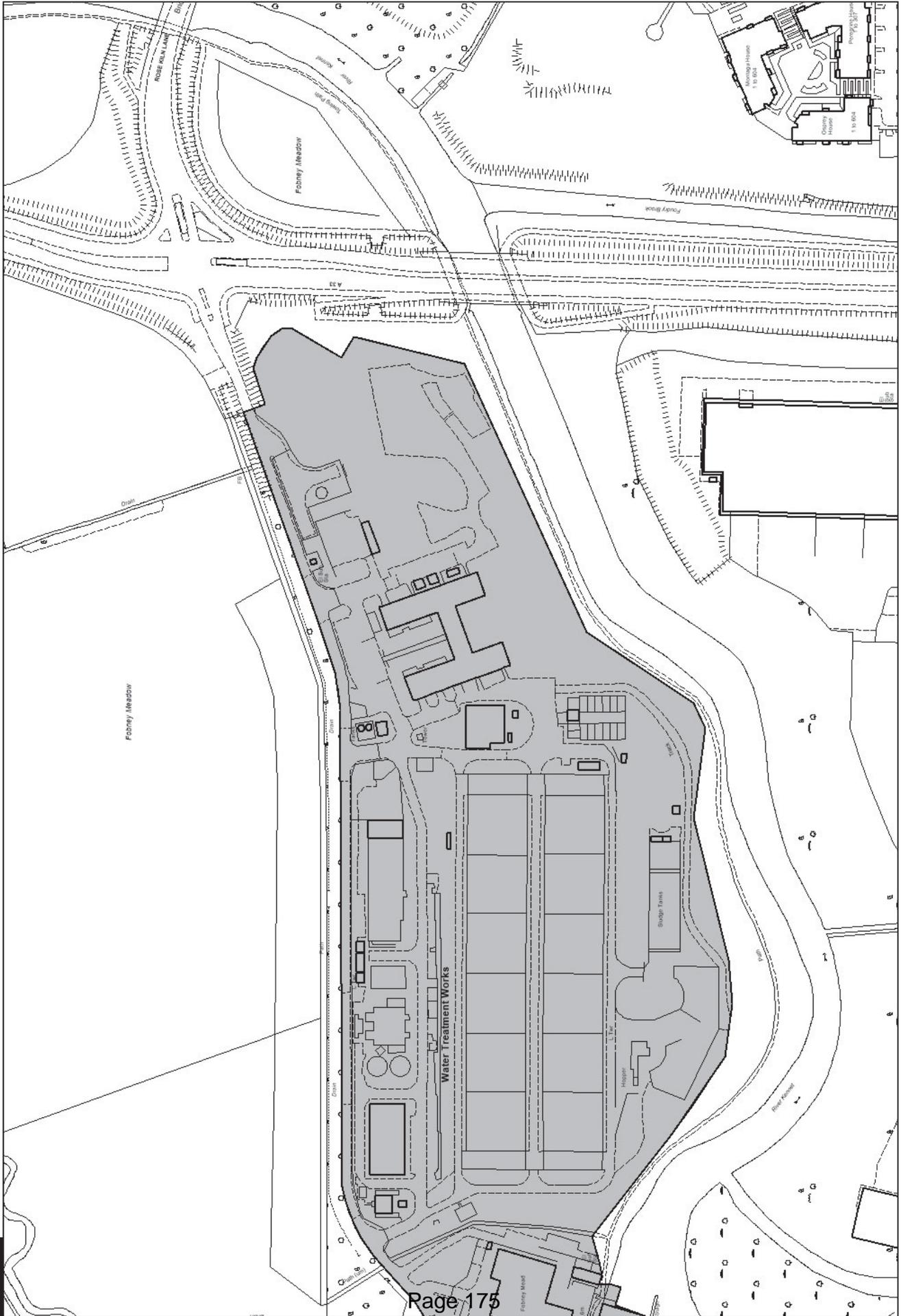
31

35

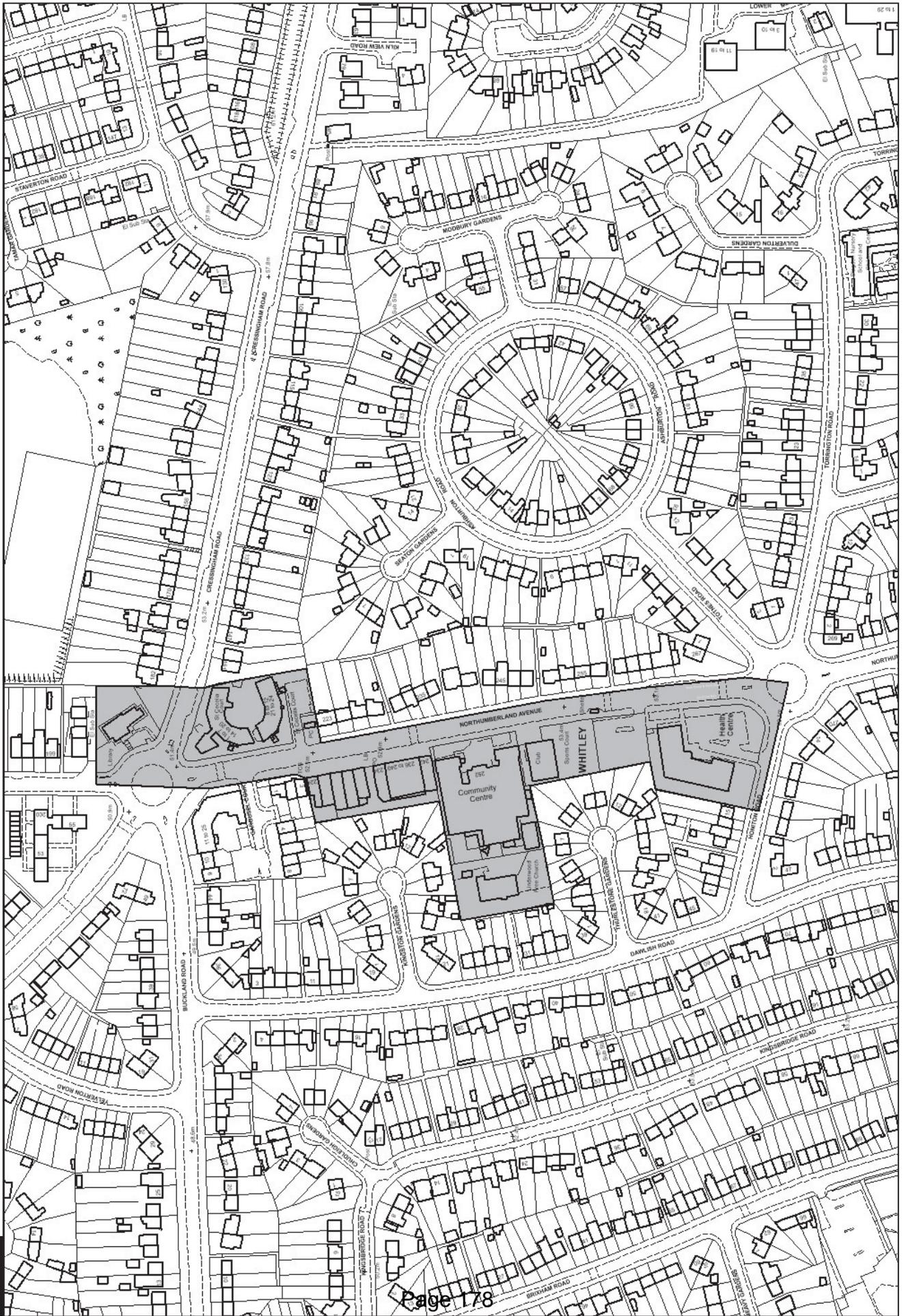
38

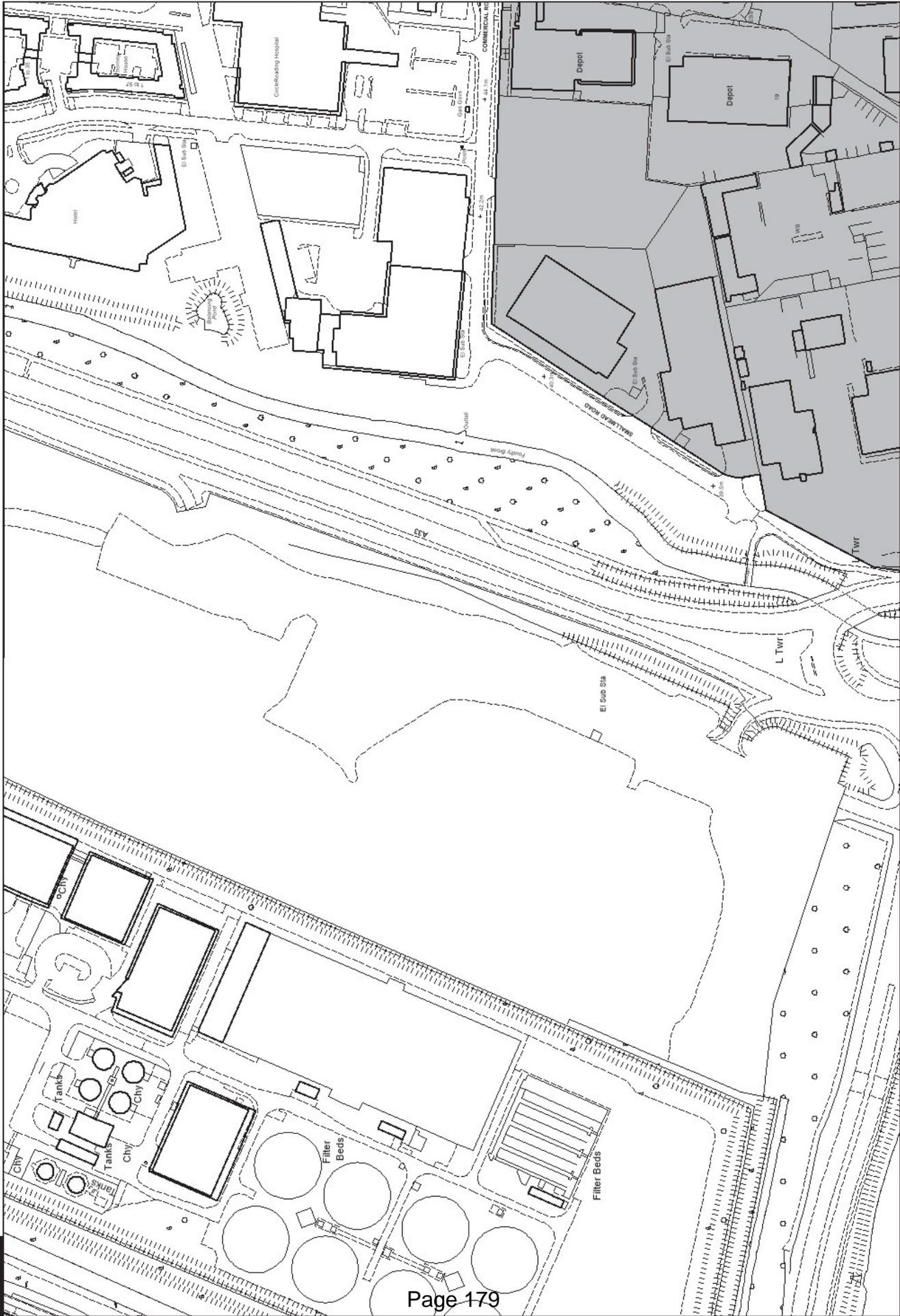


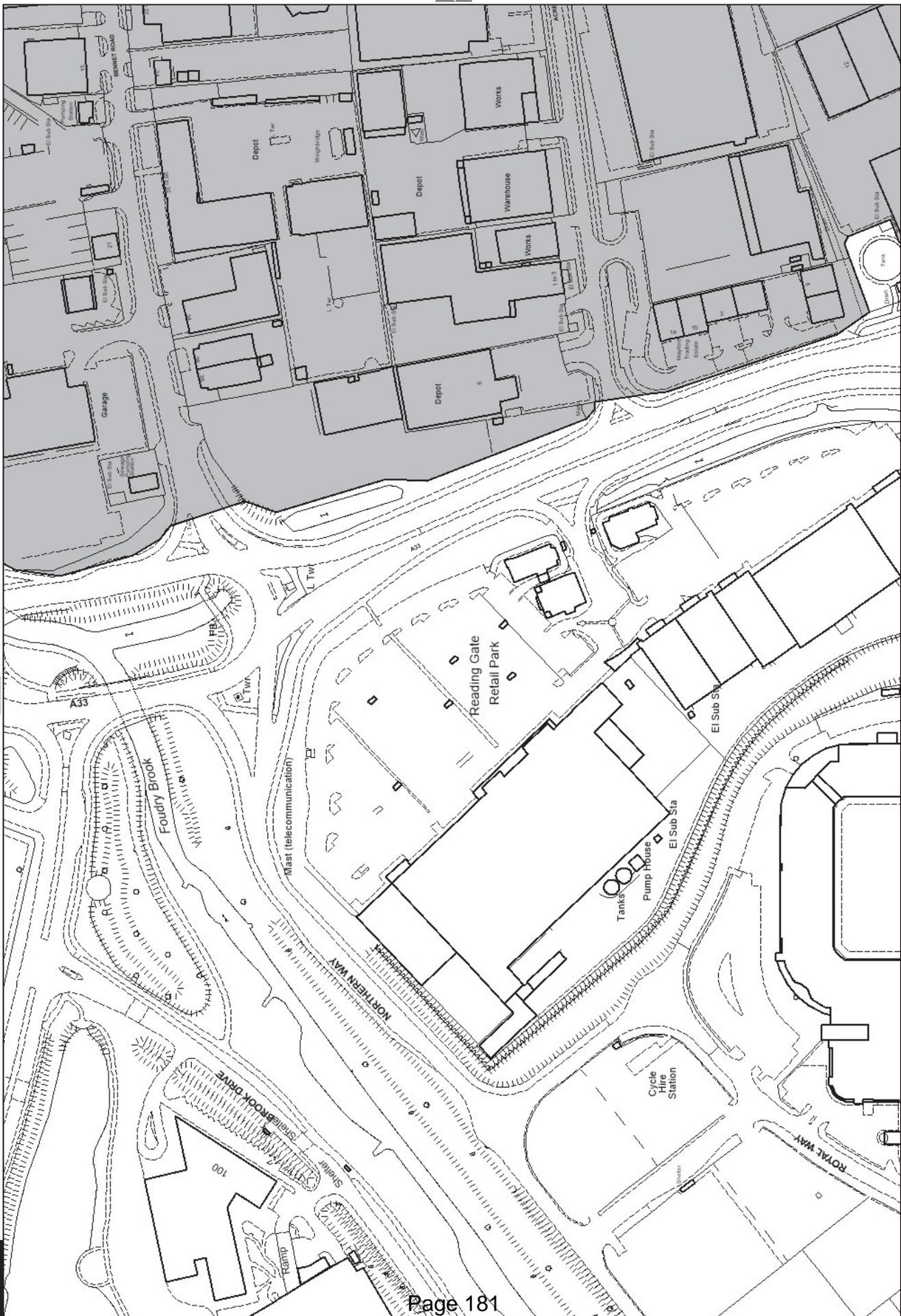


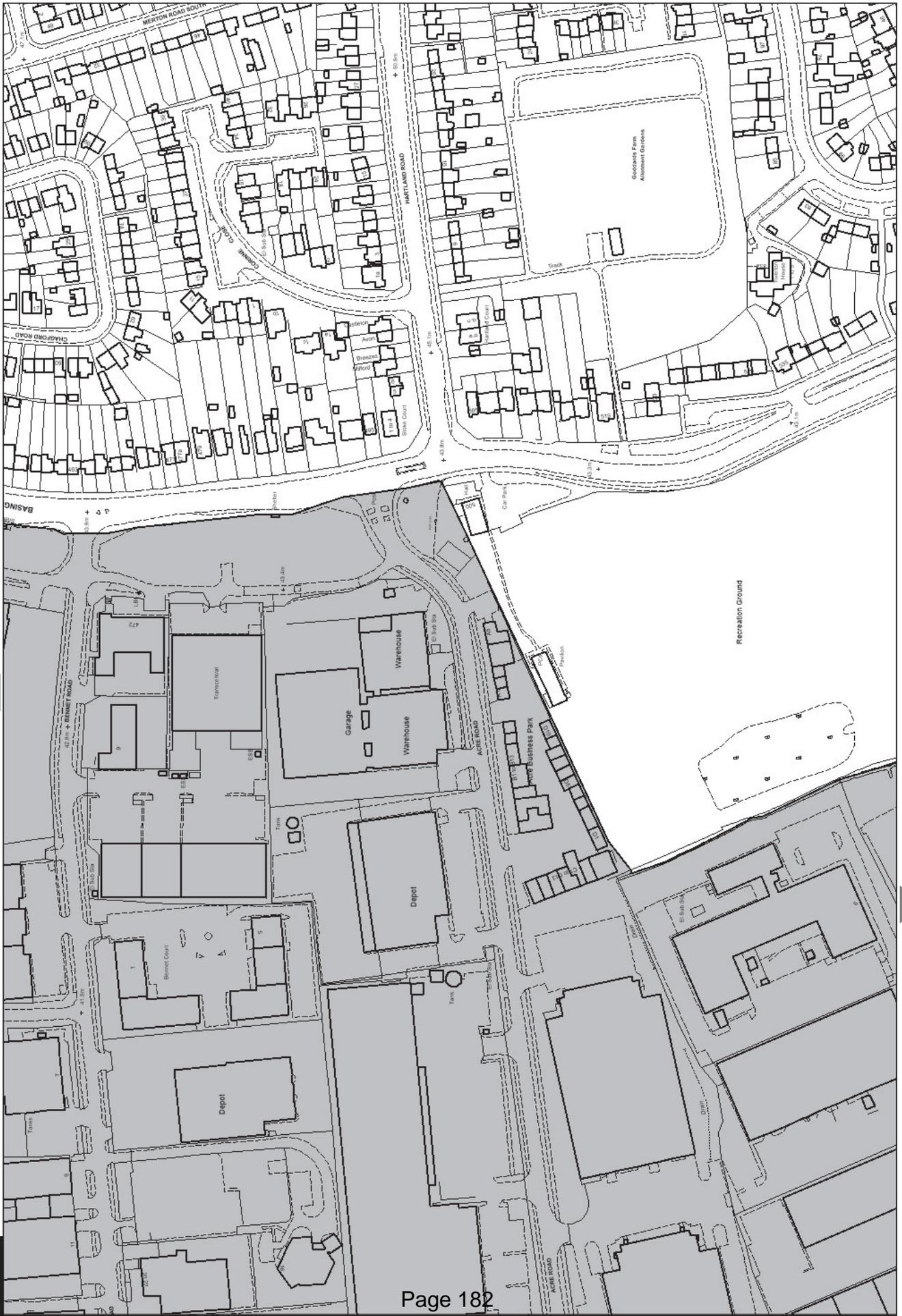


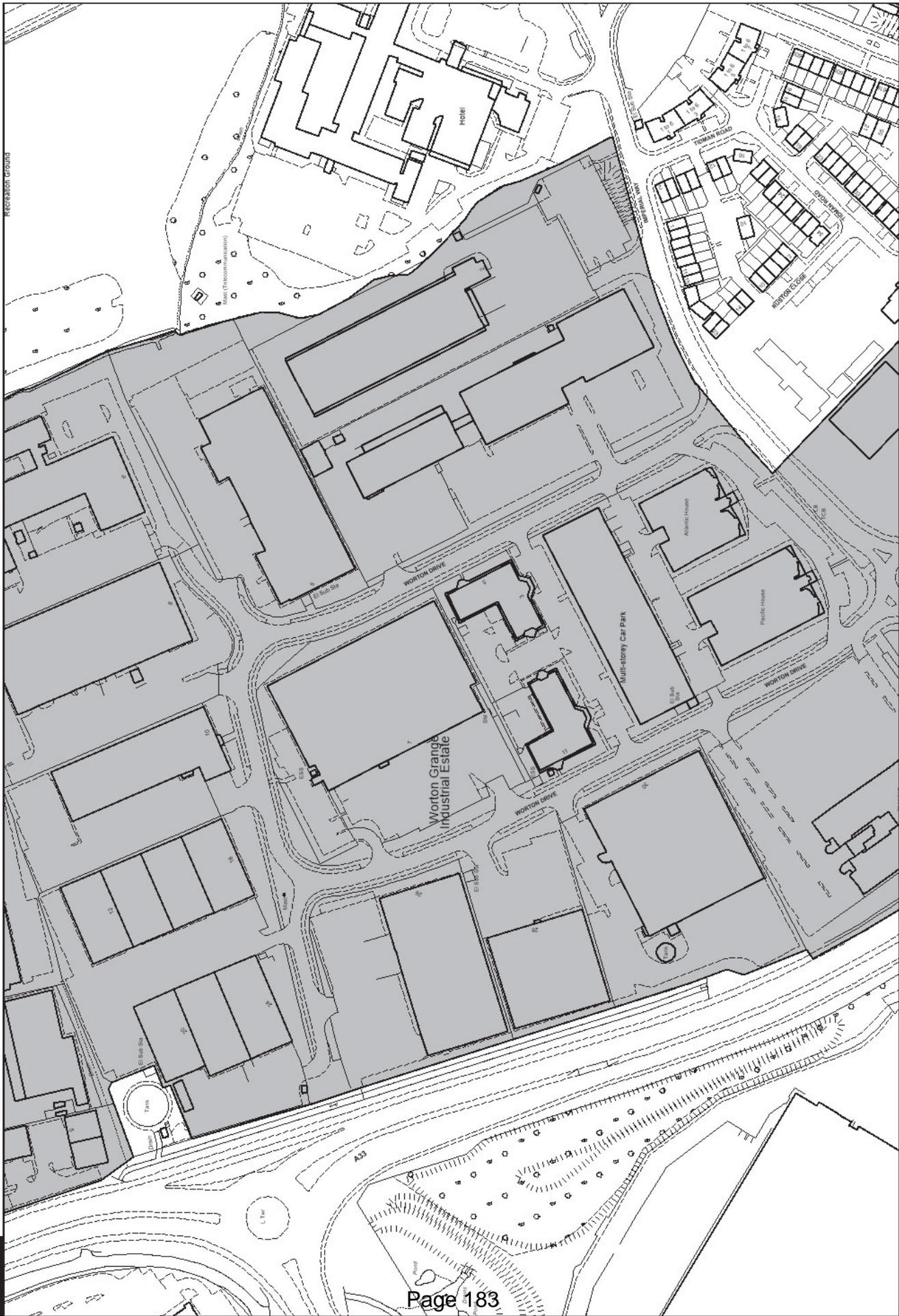


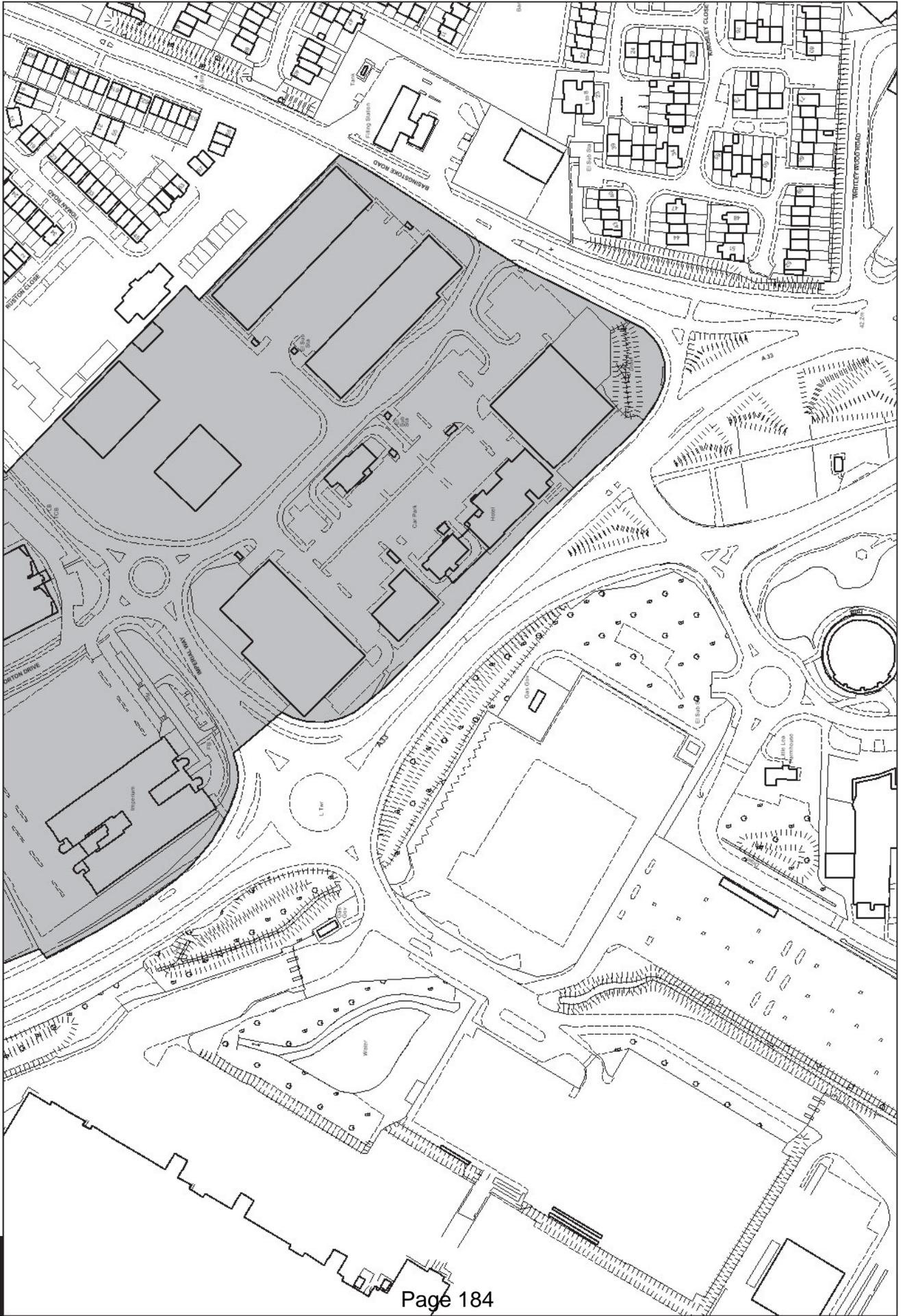






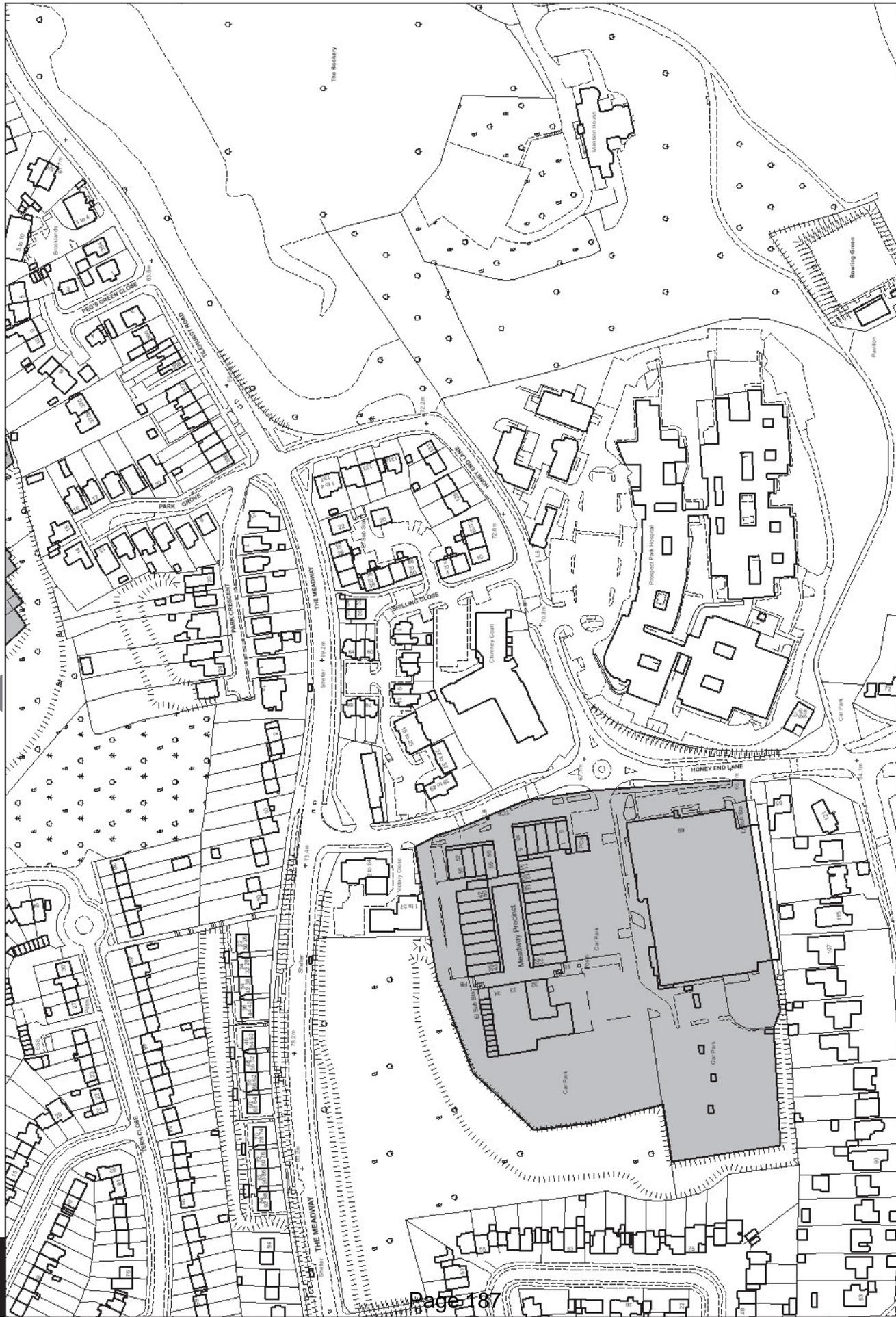


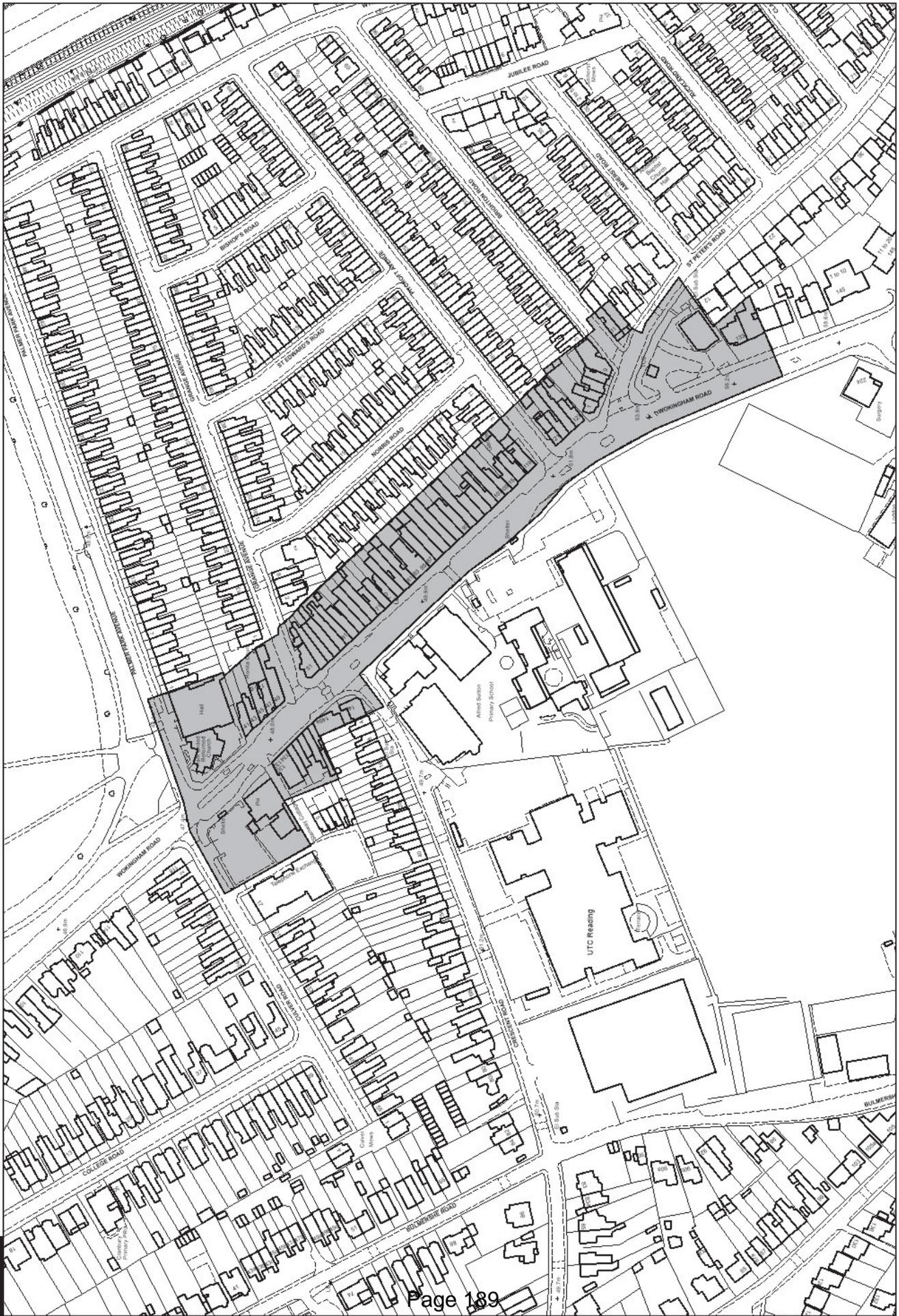




45











This page is intentionally left blank

APPENDIX 3: EVIDENCE DOCUMENT FOR ARTICLE 4 DIRECTION

Reading Borough Council

Evidence for Proposed Article 4 Direction

relating to permitted development rights for new residential dwellings

September 2021

Executive Summary

Introduction

- i. This report has been prepared to support the proposal for an Article 4 direction in Reading Borough to remove a number of permitted development rights (PDR) that would result in residential development without the need to apply for planning permission. This report considers whether there are adverse impacts justifying a direction, and if so, which PDR should be covered by any Article 4 direction, and to which specific areas or sites it should apply.
- ii. The Town and Country Planning (General Permitted Development) Order 2015 (as amended) (known as the GPDO) grants planning permission to a number of specified forms of development, known as permitted development rights (PDR). Increasingly, since 2013, PDR have been used to cover a number of forms of development that would result in new dwellings. Between 2013 and 2021, in Reading, 1,116 new dwellings had been completed through PDR, and around 56,500 sq m of commercial floorspace had been lost.
- iii. Under Article 4 of the GPDO, a direction can be made that removes specified PDR and requires that a planning application be made. This is known as an ‘Article 4 direction’. The process for making such a direction is set out in Schedule 3 of the GPDO. The National Planning Policy Framework (NPPF), as well as Planning Practice Guidance (PPG), sets out expectations for when these directions can be used, and of particular note are recent changes to the NPPF that require that any Article 4 direction that restricts changes of use to residential be limited to situations where an Article 4 direction is necessary to avoid “*wholly unacceptable adverse impacts*”.
- iv. This report sets out the evidence and justification required by the GPDO, NPPF and PPG, and goes through a number of stages to identify what forms of PDR the direction should cover and what its geographical extent should be.

Type of permitted development right considered

- v. This report covers the following forms of PDR that would create additional residential dwellings and describes them in section 2:
 - Change of use of commercial, business and service use (use class E) to residential (Part 3, class MA);
 - Change of use of hot food takeaway, betting office, payday loan shop or launderette to residential (Part 3, class M);
 - Change of use of casino or amusement arcade to residential (Part 3, class N);
 - Demolition of single, purpose built, detached block of flats or a single, detached office, light industrial or research and development building and its replacement with a detached block of flats or detached house (Part 20, class ZA);
 - Up to two additional residential storeys on a detached, purpose built block of flats (Part 20, class A);

- Up to two additional residential storeys on a detached commercial or mixed-use building (in use for retail, financial and professional, restaurant and café, office, research and development, light industrial, betting shop, payday loan shop, launderette) (Part 20, class AA);
- Up to two additional residential storeys on a two or more storey terraced commercial or mixed-use building (see class AA for uses) or one additional storey on a one storey building (Part 20, class AB);
- Construction of new residential above a terraced house, two storeys in the case of houses of two or more storeys or one additional storey in the case of a one storey house (Part 20, class AC);
- Construction of new residential above a detached house, two storeys in the case of houses of two or more storeys or one additional storey in the case of a one storey house (Part 20, class AD).

Type of area considered

- vi. Section 3 of this report divides Reading into the following areas for purposes of analysis and deciding on the broad scope:
- Town centre core;
 - Town centre fringe;
 - District and local centres;
 - Main arterial routes;
 - Employment areas;
 - Other commercial areas; and
 - Residential areas.

Extent of benefits of PDR

- vii. The extent of the claimed benefits of PDR in terms of boosting housing supply are assessed in section 4. There has been substantial take-up of PDR in Reading since 2013, with 1,116 dwellings being delivered by that route, representing 22% of completed dwellings between 2013 and 2021.
- viii. However, there remain doubts about the degree to which PDR has represented a genuine boost to housing supply in Reading. In particular, changes from office to residential were already happening in Reading through the planning permission route prior to the introduction of that form of PDR in 2013. The annual average housing completed in the ten years before office to residential PDR was introduced (2003-2013) was 665, higher than the average annual completions in the seven years since its introduction (2013-2021), which casts considerable doubt on the arguments around boosting housing supply in Reading.
- ix. In addition, the degree to which the housing provided through PDR responds to local needs is also in doubt. The small size of homes provided through PDR fail to provide important family housing, whilst the greatest local need for affordable housing is also not addressed. Considerable numbers of dwellings provided through

PDR appear to be in use as serviced apartments, whilst PDR has also been used to provide student accommodation rather than addressing local needs.

The harm caused by PDR

- x. A number of forms of harm of PDR are considered, and evidence of the harm provided, set out in section 5. Each are identified as being a wholly unacceptable adverse impact.

Size and type of dwellings

- xi. The report demonstrates in section 5.1 that the supply of PDR dwellings is dominated by studio and 1-bedroom dwellings, which make up 83% of dwellings completed through PDR since 2013. This in no way matches the needs identified, where more than 50% of homes should be family housing of 3 bedrooms or more. The identified needs for 1-bedroom accommodation for the whole plan period of 2013 to 2036 have almost already been met, and further PDR developments dominated by small dwellings fails to provide the forms of housing most needed.

Dwelling standards

- xii. The issue of the poor quality of new homes provided through PDR has been explored in a number of published reports so far. Dwellings are often very small. This has been recently addressed by the application of national space standards. There is also now a requirement for adequate natural light for habitable rooms. However, a number of issues regarding the standards applied to new dwellings are explored in section 5.2. This includes the lack of outdoor amenity space, with over 80% of dwellings completed in Reading so far through PDR having no access to private or communal outdoor space, and over 90% having no access to private or communal green space. Dwellings without windows remains a concern, with natural light potentially only being provided by rooflight. Local Plan standards around accessibility and adaptability and sustainable design, with the latter an essential element of responding to the climate emergency, cannot be required through PDR, undermining the aims of those policies.

Noise, disturbance and other environmental nuisance

- xiii. Section 5.3 of this report looks at the issues of noise, disturbance and other environmental nuisance. An analysis of environmental nuisance complaints received from PDR developments that have been completed so far demonstrates that these issues arise with the greatest frequency in the core of the town centre, related to a range of issues including existing commercial activities and outdoor events. This analysis does not highlight the potential issues with PDR developments in employment or other commercial locations because none of these have so far been completed, but detailed analysis of some outstanding prior approvals is carried out to demonstrate that these are highly likely to cause issues of noise and disturbance.

Air quality

- xiv. Air quality is an issue of great significance in Reading, a heavily built-up area with considerable congestion on some roads at peak times. Section 5.4 highlights that nitrogen dioxide (NO₂) is of greatest concern due to the fact that Reading sees exceedances of the national objectives in some locations. Air quality is not a matter that can be considered in the prior approval process, and PDR offers no opportunity to secure mitigation measures through design or planning conditions, and it is not considered acceptable to expose new residents to this level of air quality without such measures.

Loss of employment space

- xv. Section 5.5 considers the issue of loss of employment space. Development completed through PDR has already resulted in the loss of around 54,000 sq m of office floorspace in Reading since 2013. However, the Local Plan identifies a positive need for additional employment floorspace, for offices and industrial and warehousing, and further PDR developments will make it substantially more difficult to achieve these needs within both the office and light industrial categories, and therefore achieve the aims of national policy. None of the buildings that have been converted to residential so far have been entirely vacant, and, because residential values can often outstrip office values, these conversions are likely to continue to be attractive. This has resulted in low levels of availability of Grade B space, important for small and growing businesses. PDR therefore reduces the space available for businesses and can put economic growth at risk.

Impacts on existing businesses

- xvi. The introduction of residents into areas where they were not previously present, in particular in parts of the town centre core, employment areas and other primarily commercial locations, can impact on existing businesses in those areas, which are likely to cause noise and disturbance and other issues for those new residents, often at unsociable hours, and this is explored in section 5.6. Such businesses in close proximity to existing or approved PDR developments include pubs, clubs, outdoor events, waste management, recycling, industrial or HGV servicing uses. Adjacent residential development could prevent those existing businesses from continuing, expanding or intensifying their operation on site. Intensifying employment uses within the core employment areas in particular is essential to the Local Plan strategy for meeting identified employment needs.

Impacts on the high street

- xvii. With most forms of ground floor high street uses now being potentially able to be converted to residential, there is potential for considerable impacts on both the town centre of Reading, and the smaller centres distributed across the Borough. This is explored in section 5.7. It is estimated that 86% of ground floor commercial units in centres could potentially change to residential without controls being applied. The loss of a small number of key units could lead to a domino effect

threatening the whole centre. The argument that loss of a retail use can be outweighed by the gain of footfall from new residential does not hold water - according to estimates in this document, only around 3-8% of the spend lost to a centre by the loss of a retail unit is recouped through increased footfall from new dwellings. In addition, it is often argued that PDR brings residents back into centres, but evidence shows that this was happening in any case long before the introduction of PDR. Development that has an adverse impact on the health of any of the defined centres in Reading would be an unacceptable impact that undermines the whole strategy for the town.

Affordable housing

- xviii. The need for affordable housing in Reading is very significant, with a need for 406 homes per year up to 2036 equating to almost 60% of Reading's total housing need, and securing affordable housing to meet as much of this need as possible is a matter of great importance for the Council. However, homes provided through PDR make no contribution to this need, with no associated Section 106 agreement. It is estimated that, as a result of completed or outstanding prior approvals, Reading has lost out on 511 affordable dwellings (more than a year's worth of need) and £1.857 million in financial contributions towards affordable housing (which could have delivered a further 19 homes).

Contribution to local infrastructure

- xix. Due to the fact that a PDR development cannot be dependent on completion of a Section 106 agreement, it is not possible to mitigate the impacts of a development on local infrastructure through the application process, relying instead on CIL contributions which, in the case of changes of use to residential, are almost never actually payable. Section 5.9 of this report shows that there has already been a potential loss of £1.27 million of contributions towards open spaces and leisure and £0.26 million towards education from PDR developments that have completed so far. The ongoing impacts are particularly related to the inability to address site-specific open space and leisure issues, particularly where there is no on-site private amenity space, and impacts on employment and skills.

Scope of Article 4 direction required

- xx. Discussion of the various forms of harm in the previous section leads to a conclusion about what the overall scope of the Article 4 direction should be.
- xxi. The conclusion, as set out in section 6, is that the following forms of PDR should be covered by the direction:
- Change of use of commercial, business and service use (use class E) to residential (Part 3, class MA);
 - Change of use of hot food takeaway, betting office, payday loan shop or launderette to residential (Part 3, class M);
 - Change of use of casino or amusement arcade to residential (Part 3, class N);

- Demolition of single, purpose built, detached block of flats or a single, detached office, light industrial or research and development building and its replacement with a detached block of flats or detached house (Part 20, class ZA);
 - Up to two additional residential storeys on a detached commercial or mixed use building (in use for retail, financial and professional, restaurant and café, office, research and development, light industrial, betting shop, payday loan shop, launderette) (Part 20, class AA); and
 - Up to two additional residential storeys on a two or more storey terraced commercial or mixed use building (see class AA for uses) or one additional storey on a one storey building (Part 20, class AB).
- xxii. The forms of PDR that result in new residential storeys on top of existing residential are proposed to be excluded from the direction.
- xxiii. The conclusion is that the broad geographical coverage should be as follows, covering 692 hectares, or 17% of the Borough's area:
- The whole town centre as defined in the Local Plan;
 - The district and local centres as defined in the Local Plan;
 - Core employment areas as defined in the Local Plan;
 - Other entirely commercial areas; and
 - A 50m buffer of the areas of poorest air quality.

Refining the geographical extent

- xxiv. According to the NPPF, an Article 4 area should cover the smallest geographical area possible, and therefore a variety of possibilities are considered in section 7 for how the area could be reduced whilst still ensuring that the wholly unacceptable adverse impacts are addressed. The conclusions are that the area can be reduced by:
- Removing areas of significant open space within the centre;
 - Removing scheduled monuments; and
 - Removing the area covered by the Detailed Emergency Planning Zone for AWE Burghfield, which constitutes a safety hazard zone.
- xxv. Once these refinements are taken into account, the area is reduced in size from 692 ha to 482 ha, covering 12% of the total area of Reading. This is the area proposed to be taken forward for a non-immediate Article 4 direction.

Contents

Executive Summary	2
1. Introduction.....	11
1.1 Permitted development rights	11
1.2 Permitted development rights in Reading.....	12
1.3 Article 4 directions	13
1.4 Structure of this report	15
2. Type of permitted development right considered	16
2.1 Commercial to residential	16
2.2 Hot food takeaway, betting office, payday loan shop or launderette to residential.....	17
2.3 Casino or amusement arcade to residential.....	18
2.4 Demolition and rebuild for residential.....	18
2.5 Upward extension of a block of flats.....	20
2.6 Upward extension of a detached commercial or mixed use building.....	21
2.7 Upward extension of a terraced commercial or mixed use building.....	22
2.8 Upward extension of a terraced house	22
2.9 Upward extension of a detached house	23
3. Type of area considered	24
3.1 Town centre core	24
3.2 Town centre fringe	24
3.3 District and local centres	25
3.4 Main arterial routes.....	25
3.5 Core employment areas.....	25
3.6 Other commercial areas	26
3.7 Residential areas.....	26
3.8 Broad location of the areas considered.....	26
4. Extent of benefits of PDR.....	28
4.1 Number of homes	28
4.2 Relationship to local need	31
4.3 Conclusion	33
5. The harm caused by PDR.....	34
5.1 Size and type of dwellings.....	34
<i>Wholly unacceptable adverse impacts.....</i>	<i>36</i>
<i>Relevance to types of PDR.....</i>	<i>37</i>
<i>Relevance to types of area.....</i>	<i>37</i>
5.2 Dwelling standards.....	38
<i>Dwelling dimensions.....</i>	<i>38</i>
<i>Outdoor amenity space</i>	<i>39</i>
<i>Windows and natural light</i>	<i>41</i>
<i>Accessibility and adaptability</i>	<i>41</i>
<i>Sustainable design and construction.....</i>	<i>42</i>

<i>Other matters</i>	43
<i>Wholly unacceptable adverse impacts</i>	44
<i>Relevance to types of PDR</i>	45
<i>Relevance to types of area</i>	45
5.3 Noise, disturbance and other environmental nuisance	45
<i>Evidence from completed developments</i>	46
<i>Committed developments in employment and commercial locations</i>	49
<i>Wholly unacceptable adverse impacts</i>	53
<i>Relevance to types of PDR</i>	54
<i>Relevance to types of area</i>	54
5.4. Air quality	55
<i>Wholly unacceptable adverse impacts</i>	58
<i>Relevance to types of PDR</i>	58
<i>Relevance to types of area</i>	59
5.5. Loss of employment space.....	59
<i>Wholly unacceptable adverse impacts</i>	63
<i>Relevance to types of PDR</i>	64
<i>Relevance to types of area</i>	64
5.6. Impacts on existing businesses.....	65
<i>Wholly unacceptable adverse impacts</i>	68
<i>Relevance to types of PDR</i>	68
<i>Relevance to types of area</i>	69
5.7 Impacts on the high street.....	69
<i>Quantifying the impact of loss of ground floor retail to residential</i>	71
<i>Reintroducing residential to the high street</i>	73
<i>Summary</i>	75
<i>Wholly unacceptable adverse impacts</i>	75
<i>Relevance to types of PDR</i>	76
<i>Relevance to types of area</i>	77
5.8 Affordable housing.....	77
<i>Affordable housing supply</i>	78
<i>Potential affordable housing delivery of PDR schemes</i>	79
<i>Wholly unacceptable adverse impacts</i>	81
<i>Relevance to types of PDR</i>	82
<i>Relevance to types of area</i>	82
5.9 Contribution to local infrastructure.....	82
<i>Education</i>	83
<i>Leisure and open space</i>	84
<i>Transport</i>	85
<i>Skills and training</i>	85
<i>Summary</i>	86
<i>Wholly unacceptable adverse impacts</i>	86

	<i>Relevance to types of PDR</i>	87
	<i>Relevance to types of area</i>	87
6.	Scope of Article 4 direction required	88
6.1	Types of permitted development to be covered	88
6.2	Types of area to be covered.....	90
	<i>Town centre core</i>	91
	<i>Town centre fringe</i>	92
	<i>District and local centres</i>	93
	<i>Important employment areas</i>	95
	<i>Other primarily commercial areas</i>	97
	<i>Areas of poorest air quality</i>	99
	<i>Summary</i>	100
6.3	Summary of overall scope	101
7.	Refining the geographical extent.....	103
7.1	Open spaces	103
7.2	Scheduled monuments	104
7.3	Listed buildings.....	105
7.4	Conservation areas	106
7.5	Safety hazard zones	106
7.6	Industrial and warehouse locations	107
7.7	Secondary frontages.....	108
7.8	Areas not in relevant uses	109
7.9	Summary	110
8.	References	111

1. Introduction

1.0.1 This report has been prepared to support the proposal for an Article 4 direction in Reading Borough to remove a number of permitted development rights (PDR) that would result in residential development without the need to apply for planning permission. This report considers whether there are adverse impacts justifying a direction, and if so, which PDR should be covered by any Article 4 direction, and to which specific areas or sites it should apply.

1.1 Permitted development rights

1.1.1 The Town and Country Planning (General Permitted Development) Order 2015 (as amended) (known as the GPDO) grants planning permission to a number of specified forms of development. The forms of development for which permission is granted are set out in Schedule 2 of the GPDO. These are known as permitted development rights (referred to here as PDR).

1.1.2 The forms of development that benefit from these PDR are extensive and wide-ranging. They encompass various minor alterations to dwellinghouses, minor operations, temporary uses and specified infrastructure development, as well as many other forms.

1.1.3 PDR has long been an important part of how the planning system functions, and allow for minor development which would be unlikely to detrimentally affect the amenity of an area or for otherwise essential development to take place. However, over recent years there has been a clear expansion of the application of PDR.

1.1.4 In particular, the introduction of PDR for changes of use from office to residential (Part 3, Class O) in 2013 represented a major change in how PDR were used¹. This was initially introduced as a temporary measure, for three years, to bring forward more housing supply and make better use of buildings that are no longer needed or are unsuitable for their original purpose. However, this PDR was made permanent in 2016.

1.1.5 Since office to residential PDR were introduced, further widening of PDR that would result in new dwellings have taken place. Changes from retail (A1) or financial and professional services (A2) to residential were enabled from April 2014, whilst temporary rights to change use from storage and distribution (B8) to residential came into force in April 2015, although prior approval needs to have been granted by June 2019. Further PDR for changes from light industrial (B1c) to residential followed in 2017 and the rights to convert retail to residential were expanded to include takeaways (A5) in 2019.

1.1.6 The introduction of the new use class E in 2020 meant the need to amend and consolidate many of these PDR. Use class E covers many of the uses outlined above,

¹ PDR allowing for changes from agricultural buildings to residential were also introduced in 2013, but were not used in Reading due to its urban nature, and are not covered in this report for the same reason.

including offices, light industrial, retail and financial and professional, as well as a number of other uses such as restaurants and cafes, medical facilities and indoor sport and recreation, not previously covered by PDR. A single PDR for changes of use from use class E to residential came into effect on 1st August 2021.

- 1.1.7 In 2020, in addition to the various changes of use, new PDR were introduced that allowed new dwellings to be created through new development. These dwellings could be delivered by upward extension of existing blocks of flats, dwellinghouses or commercial or mixed use buildings, or by demolition and rebuild of vacant blocks of flats or office, research and development or light industrial buildings.
- 1.1.8 Each PDR is accompanied by a list of forms of development that are not permitted, which can mean the application of, for instance, size limits. In addition, a prior approval process is required which means that an applicant needs to apply to the local planning authority as to whether prior approval is required. The local planning authority may only consider this application against a set of specific conditions set out in the relevant part of Schedule 2 of the GPDO, which mean that only specific matters can be considered. Prior approval is more of an exercise of assessing technical compliance as opposed to considering the overall planning balance, as would be the case for a planning application.
- 1.1.9 PDR has also been expanded over recent years in other ways that would not result in residential development. For instance, changes of use of a number of different uses to form a school have been in place since 2013, whilst new expanded permitted development rights for public service infrastructure (schools, colleges, universities, hospitals and prisons) came into effect in 2021. These forms of PDR are not detailed further here as they do not form the focus of this report.

1.2 Permitted development rights in Reading

- 1.2.1 This report focuses on those forms of PDR that result in new residential dwellings. There has been considerable take-up of some of these PDR in Reading, in particular conversions of office to residential. Up to 31st March 2021, 1,087 new dwellings had been completed by this PDR, and around 55,000 sq m of office accommodation had been lost. A further 560 dwellings had prior approval at 31st March 2021, which would result in the loss of a further 31,000 sq m of office floorspace.
- 1.2.2 There has also been some take-up of the other permitted development rights for conversion to residential from retail and related uses and storage and distribution, but this has been much lower due to the low size limits that applied until recently, as well as other more restrictive conditions. Only 29 dwellings have been delivered through these routes up to 31st March 2021, with around 1,500 sq m of floorspace lost, most of which has involved conversion from shops.
- 1.2.3 There had been no approvals for the other forms of permitted development, for demolition and rebuild and upward extension by the end of March 2021. These are relatively new PDR, only put in place in 2020, and the likely scale of the uptake in Reading is therefore not yet clear.

1.3 Article 4 directions

- 1.3.1 Under Article 4 of the GPDO, a planning authority or the Secretary of State can remove specified PDR (other than specified PDR set out in article 4 (2)), and require that a planning application be made. This is known as an ‘Article 4 direction’. Schedule 3 of the GPDO provides more detailed legislation on the process to be followed in making such directions.
- 1.3.2 An Article 4 direction does not mean that development cannot take place. Its purpose is to ensure that a planning application is required. The planning application then needs to be determined with reference to the development plan and other material considerations.
- 1.3.3 There are two types of Article 4 direction: immediate and non-immediate. The process for an immediate Article 4 direction is covered in paragraph 2 of Schedule 3 of the GPDO, whilst the process for a non-immediate direction is dealt with in paragraph 1 of Schedule 3.
- 1.3.4 An immediate Article 4 direction, once served on an area, removes the specified PDR with immediate effect, albeit that it still requires confirmation within six months of coming into force. Not all forms of PDR can be subject to an immediate direction, and paragraph 2(1)(a) and (b) sets out those forms that can potentially be covered. Paragraph 2(1)(a) of Schedule 3 also requires that, to be covered by an immediate direction, the local planning authority should consider that “*the development to which the direction relates would be prejudicial to the proper planning of their area or constitute a threat to the amenities of their area*”, other than in conservation areas where different tests under paragraph 2(1)(b) apply.
- 1.3.5 A non-immediate Article 4 direction does not come into effect immediately, and instead specifies a later date when it takes effect, which is at least 28 days and at most 2 years after the last notice is served. In practice, this is usually at least 12 months after the last notice of making the direction is served to avoid liability for compensation, in line with Sections 107 and 108 of the Town and Country Planning Act 1990. The direction requires confirmation, taking into account any consultation responses, at least 28 days after the last notice was served.
- 1.3.6 The most recent version of the National Planning Policy Framework (NPPF), July 2021, sets out the circumstances in which an Article 4 direction can or should be considered in paragraph 53.

“The use of Article 4 directions to remove national permitted development rights should:

- *where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously*

undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)

- *in other cases, be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities)*
- *in all cases, be based on robust evidence, and apply to the smallest geographical area possible.”*

1.3.7 It is therefore clear that an Article 4 direction needs to be accompanied by evidence which clearly shows why it is necessary, and which justifies the extent of the area. This report provides that evidence. The phrase “wholly unacceptable adverse impacts” presents a high bar for controlling changes of use to residential.

1.3.8 Planning Practice Guidance (PPG) provides further guidance on the operation and scope of Article 4 directions. It states that:

“Provided that there is justification for both its purpose and extent, an article 4 direction can:

- *cover an area of any geographic size, from a specific site to a local authority-wide area*
- *remove specified permitted development rights related to operational development or change of use*
- *remove permitted development rights with temporary or permanent effect.”*

1.3.9 PPG further comments on the use of directions as follows:

“The use of article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. The potential harm that the direction is intended to address will need to be clearly identified, and there will need to be a particularly strong justification for the withdrawal of permitted development rights relating to:

- *a wide area (eg those covering the entire area of a local planning authority, National Park or Area of Outstanding National Beauty)*

...

- *cases where prior approval powers are available to control permitted development*

...”

1.3.10 In summary, therefore, there needs to be robust evidence to support an Article 4 direction that clearly identifies the potential harm and why it is necessary to protect local amenity or the wellbeing of the area, and, in the case of changes of use to residential, what the wholly unacceptable adverse impacts would be.

1.4 Structure of this report

1.4.1 After this introductory section, the report goes on to set out, in section 2, which forms of permitted development will be covered in this report. It outlines what they entail, which elements can be considered during a prior approval process, and which cannot.

1.4.2 Section 3 contains a brief overview of the different types of area which can be found in Reading. This is to enable a high-level analysis of which broad types of area any Article 4 direction should cover, before more detailed consideration of the boundaries.

1.4.3 Section 4 deals with the claimed benefits of permitted development in Reading, looking in particular at the delivery of dwellings through PDR over recent years and the extent to which this has resulted in any boost to housing supply.

1.4.4 The types of harm caused by PDR are outlined in section 5, supported by relevant evidence. This section contains the main bulk of the evidence on why an Article 4 direction is required and helps to assess which forms of PDR and which areas should be covered. In each case, it presents conclusions on whether the harm represents a wholly unacceptable adverse impact, as required by the NPPF.

1.4.5 Section 6 presents overall conclusions from the preceding sections in terms of what the overall scope of an Article 4 direction should be, in terms of the forms of PDR that should be covered and the broad geographical extent.

1.4.6 Finally, section 7 looks in more detail at the geographical extent of the proposed Article 4 direction area, and asks in particular whether there is scope to reduce the extent to the smallest area possible that still fulfils the purpose of the direction.

2. Type of permitted development right considered

- 2.0.1 This report considers whether an Article 4 direction should be applied to any of the forms of PDR that would result in new dwellings. These have been grouped together because it is considered likely that there would be common issues across many of these forms of development. The report will consider which of these, if any, should be covered by a proposed Article 4 direction.
- 2.0.2 The forms of PDR considered are set out in the following sections. Where the description of each PDR is set out, this is a summary only, and reference should be made to the GPDO for the full extent of each PDR.
- 2.0.3 It is worth noting that, alongside the conditions set out in each individual PDR, all dwellings resulting from PDR are, as of 2021, required to comply with the nationally-described space standard.

2.1 Commercial to residential

- 2.1.1 Part 3, Class MA of Schedule 3 of the GPDO grants planning permission to change use from commercial, business and service use (use class E) to residential. Use class E covers a wide variety of uses including most retail uses, cafes and restaurants, financial and professional services, indoor sport and recreation, medical and health services, creche/nursery or day centre, offices, research and development and light industrial.
- 2.1.2 This PDR was introduced in 2021 and replaced a number of previous forms of PDR. This includes changes from office, retail and financial and professional to residential.
- 2.1.3 Development not permitted by this PDR includes where the building has not been vacant for at least three months prior to the application, buildings exceeding 1,500 sq m of floorspace, where the building is listed and where the building is in a variety of defined locations such as scheduled monuments or safety hazard areas, but not including conservation areas.
- 2.1.4 The matters that can be considered under prior approval are as follows:
- Transport and highways impacts;
 - Contamination;
 - Flooding;
 - Impacts from noise from commercial premises on occupiers;
 - For the change of use of a ground floor in a conservation area, the impact on the character or sustainability of the conservation area;
 - Natural light in all habitable rooms;
 - Impact on occupiers from introduction into an area important for industry, waste management and/or storage and distribution;
 - For the change of use of a nursery or health centre, the impact on the local provision of services; and

- Fire safety impacts on the occupants of the building.

2.1.5 The matters that cannot be considered under prior approval include the following:

- Air quality;
- Noise impacts from sources other than commercial premises;
- Impacts on the health of a centre or the local provision of services for any uses other than a nursery or health centre;
- Loss of floorspace required to support the local economy;
- Impacts on existing businesses of residential use in the area;
- Standards of residential accommodation provided in terms of matters such as accessibility and sustainability;
- Size of proposed dwellings in terms of number of bedrooms;
- Impacts on infrastructure other than transport and highways; and
- Provision of affordable housing.

2.2 Hot food takeaway, betting office, payday loan shop or launderette to residential

2.2.1 Part 3, Class M of Schedule 3 of the GDPO grants planning permission to change the use of various 'sui generis' uses to residential, namely a hot food takeaway, betting office, payday loan shop or launderette.

2.2.2 Amendments to this PDR were made in August 2021 following a technical consultation undertaken in May and June 2021, which changed some of the associated exclusions and permissions.

2.2.3 Development not permitted by this PDR includes where the cumulative floor space changing use would exceed 150 sq m, where the external dimensions would be extended, where there would be any demolition, where the building is listed and where the building is in a variety of defined locations such as conservation areas, scheduled monuments or safety hazard areas.

2.2.4 The matters that can be considered under prior approval are as follows:

- Transport and highways impacts;
- Contamination;
- Flooding;
- For a launderette, the adequate provision of services, where there is a reasonable prospect of the building being used for this;
- Design and external appearance of the building; and
- Natural light in all habitable rooms.

2.2.5 The matters that cannot be considered under prior approval include the following:

- Air quality;
- Noise impacts;
- The adequate provision of services for uses other than a launderette;

- Impacts on existing businesses of residential use in the area;
- Impact on the sustainability of the shopping area in which it is located;
- Standards of residential accommodation provided in terms of matters such as accessibility and sustainability;
- Size of proposed dwellings in terms of number of bedrooms;
- Impacts on infrastructure other than transport and highways; and
- Provision of affordable housing.

2.3 Casino or amusement arcade to residential

2.3.1 Part 3, Class N of Schedule 3 of the GDPO grants planning permission to change the use of a casino or amusement arcade to residential.

2.3.2 Development not permitted by this PDR includes where the cumulative floor space changing use would exceed 150 sq m, where there would be building operations other than those specified including installation of doors, windows, roofs or walls, where the building is listed and where the building is in a variety of defined locations such as conservation areas, scheduled monuments or safety hazard areas.

2.3.3 The matters that can be considered under prior approval are as follows:

- Transport and highways impacts;
- Contamination;
- Flooding;
- Design and external appearance of the building; and
- Natural light in all habitable rooms.

2.3.4 The matters that cannot be considered under prior approval include the following:

- Air quality;
- Noise impacts;
- Impact on the sustainability of the shopping area in which it is located;
- Impacts on existing businesses of residential use in the area;
- Standards of residential accommodation provided in terms of matters such as accessibility and sustainability;
- Size of proposed dwellings in terms of number of bedrooms;
- Impacts on infrastructure other than transport and highways; and
- Provision of affordable housing.

2.4 Demolition and rebuild for residential

2.4.1 Part 20, Class ZA of Schedule 3 of the GDPO grants planning permission to demolish a purpose-built block of flats or single, detached office, research and development and/or light industrial building and replace it with a purpose-built block of flats or dwellinghouse.

2.4.2 The operations covered in this PDR are detailed in Schedule 2, but include demolition and construction works, removal and installation of access, plant and

utility connections, construction of ancillary facilities for the new building, and provision of scaffolding or temporary structures to support the operations.

2.4.3 Development not permitted by this PDR includes where the building is listed or within a listed building's curtilage and where the building is in a variety of defined locations such as conservation areas, scheduled monuments or safety hazard areas. The building to be demolished must have been constructed before the end of 1989, be less than 1,000 sq m in footprint and up to 18 metres in height (excluding plant and equipment), and must have been vacant for six months prior to the prior approval application, and not rendered unsafe or uninhabitable by action or inaction of anyone with interest in the land. There are also size parameters for the new building, which must be within the footprint of the old building, cannot exceed the lower of 7 metres above the height of the old building or 18 metres total, cannot exceed two storeys above the height of the old building and some additional matters.

2.4.4 The matters that can be considered under prior approval are as follows:

- Transport and highways impacts;
- Contamination;
- Flooding;
- Design;
- External appearance;
- Natural light in all habitable rooms;
- Impact on amenity of occupants of new or neighbouring buildings including overlooking, privacy or light;
- Impacts from noise from commercial premises on occupiers;
- Impacts on businesses and new residents of residential use in the area;
- Impact on heritage and archaeology;
- Method of demolition;
- Plans for landscaping; and
- Where airspace not occupied by the old building is to be occupied, impacts on air traffic and defence assets or on protected vistas.

2.4.5 The matters that cannot be considered under prior approval include the following:

- Air quality;
- Noise impacts from sources other than commercial premises;
- Loss of floorspace required to support the local economy;
- Standards of residential accommodation provided in terms of matters such as accessibility and sustainability;
- Size of proposed dwellings in terms of number of bedrooms;
- Impacts on infrastructure other than transport and highways; and
- Provision of affordable housing.

2.5 Upward extension of a block of flats

2.5.1 Part 20, Class A of Schedule 3 of the GDPO grants planning permission to add up to two new storeys providing dwellinghouses onto an existing purpose built, detached block of flats.

2.5.2 This also covers operations necessary to construct these storeys, including engineering operations, replacement or installation of plant, construction of access and ancillary facilities.

2.5.3 Development not permitted by this PDR includes where use for flats has been as a result of changes under PDR, there are fewer than 3 above ground storeys or the building was constructed before 1st July 1948 or after 5th March 2018. Additional storeys must be placed on the principal part of the building. There are height limits to the additional storeys, and the total height cannot exceed the height of the existing building by more than 7 metres, whilst the overall height must not exceed 30 metres (excluding plant). Visible exterior support structures are not permitted, and neither are engineering operations for strengthening or utility provision outside the curtilage of the existing building. Development is not permitted within various protected locations, including conservation areas, scheduled monuments and safety hazard areas, or affecting a listed building or its curtilage.

2.5.4 The matters that can be considered under prior approval are as follows:

- Transport and highways impacts;
- Impacts on air traffic and defence assets;
- Contamination;
- Flooding;
- External appearance;
- Natural light in all habitable rooms;
- Impact on amenity of occupants of existing or neighbouring buildings including overlooking, privacy or light;
- Impacts on protected vistas; and
- Fire safety of the external wall construction (where over 18m in height) and fire safety impacts on the occupants of the building.

2.5.5 The matters that cannot be considered under prior approval include the following:

- Air quality;
- Noise;
- Impacts on amenity of occupants of the additional storeys;
- Size of proposed dwellings in terms of number of bedrooms;
- Standards of residential accommodation provided in terms of matters such as accessibility and sustainability;
- Impacts on infrastructure other than transport and highways; and
- Provision of affordable housing.

2.6 Upward extension of a detached commercial or mixed use building

- 2.6.1 Part 20, Class AA of Schedule 3 of the GDPO grants planning permission to add up to two new storeys providing dwellinghouses onto a detached building in commercial use or in a mixed use containing commercial and dwellinghouses. Commercial use in this case means retail, food and drink, financial and professional, office, betting shop, payday loan shop or launderette.
- 2.6.2 This also covers operations necessary to construct these storeys, including engineering operations, replacement or installation of plant, construction of access and ancillary facilities.
- 2.6.3 Development not permitted by this PDR includes where there are fewer than 3 above ground storeys or the building was constructed before 1st July 1948 or after 5th March 2018. Additional storeys must be placed on the principal part of the building. There are height limits to the additional storeys, and the total height cannot exceed the height of the existing building by more than 7 metres, whilst the overall height must not exceed 30 metres (excluding plant). Visible exterior support structures are not permitted, and neither are engineering operations for strengthening or utility provision outside the curtilage of the existing building. Development is not permitted within various protected locations, including conservation areas, scheduled monuments and safety hazard areas, or affecting a listed building or its curtilage.
- 2.6.4 The matters that can be considered under prior approval are as follows:
- Transport and highways impacts;
 - Impacts on air traffic and defence assets;
 - Contamination;
 - Flooding;
 - External appearance, including of the principal elevation or any elevation fronting a highway;
 - Natural light in all habitable rooms;
 - Impact on amenity of occupants of existing or neighbouring buildings including overlooking, privacy or light;
 - Impacts from noise from commercial premises on occupiers;
 - Impacts on businesses and new residents of residential use in the area;
 - Impacts on protected vistas; and
 - Fire safety of the external wall construction (where over 18m in height) and fire safety impacts on the occupants of the building.
- 2.6.5 The matters that cannot be considered under prior approval include the following:
- Air quality;
 - Noise impacts from sources other than commercial premises;
 - Impacts on amenity of occupants of the additional storeys;
 - Size of proposed dwellings in terms of number of bedrooms;

- Standards of residential accommodation provided in terms of matters such as accessibility and sustainability;
- Impacts on infrastructure other than transport and highways; and
- Provision of affordable housing.

2.7 Upward extension of a terraced commercial or mixed use building

- 2.7.1 Part 20, Class AB of Schedule 3 of the GDPO grants planning permission to add up to two new storeys providing dwellinghouses onto a terraced building in commercial use or in a mixed use containing commercial and dwellinghouses. Commercial use in this case means retail, food and drink, financial and professional, office, betting shop, payday loan shop or launderette.
- 2.7.2 This class is very similar to Class AA. The main differences include that, for existing buildings of one storey, only one additional storey can be added. In addition, the height cannot be higher than 3.5m above the height of every other building in the terrace (excluding plant). In addition, for existing buildings of one storey, the height cannot exceed 3.5m above the existing building height.

2.8 Upward extension of a terraced house

- 2.8.1 Part 20, Class AC of Schedule 3 of the GDPO grants planning permission to add up to two new storeys providing dwellinghouses onto a terraced house of two or more storeys and one new storey onto a terraced house of one storey.
- 2.8.2 This also covers operations necessary to construct these storeys, including engineering operations, construction of access and ancillary facilities.
- 2.8.3 Development not permitted by this PDR includes where the building was constructed before 1st July 1948 or after 5th March 2018. Additional storeys must be placed on the principal part of the building. In terms of height limits, the overall height cannot exceed 18 metres, whilst the maximum height above the existing dwelling is 3.5 metres (for one storey dwellings) or 7 metres (for two storey dwellings), and the overall height cannot exceed every other building in the terrace by more than 3.5 metres. Visible exterior support structures are not permitted, and neither are engineering operations for strengthening or utility provision outside the curtilage of the existing building. Development is not permitted within various protected locations, including conservation areas, scheduled monuments and safety hazard areas, or affecting a listed building or its curtilage.
- 2.8.4 The matters that can be considered under prior approval are as follows:
- Transport and highways impacts;
 - Impacts on air traffic and defence assets;
 - Contamination;
 - Flooding;

- External appearance, including the principal elevation or any elevation fronting a highway;
- Natural light in all habitable rooms;
- Impact on amenity of occupants of neighbouring premises including overlooking, privacy or light; and
- Impacts on protected vistas.

2.8.5 There are also requirements that materials be of a similar appearance to the existing house, and that roof pitch matches the existing house, and that there be no window in any side elevation.

2.8.6 The matters that cannot be considered under prior approval include the following:

- Air quality;
- Noise impacts;
- Impacts on amenity of occupants of the existing dwelling to be extended and of the additional storey(s);
- Size of proposed dwellings in terms of number of bedrooms;
- Standards of residential accommodation provided in terms of matters such as accessibility and sustainability;
- Impacts on infrastructure other than transport and highways; and
- Provision of affordable housing.

2.9 Upward extension of a detached house

2.9.1 Part 20, Class AD of Schedule 3 of the GDPO grants planning permission to add up to two new storeys providing dwellinghouses onto a detached house of two or more storeys and one new storey onto a terraced house of one storey.

2.9.2 This class is very similar to Class AC, with the main difference being that there is no requirement relating to the height of other dwellinghouses in a terrace.

3. Type of area considered

- 3.0.1 In line with Planning Practice Guidance, the extent of an Article 4 direction requires justification. It makes sense to look at this in broad terms first, to understand whether the PDR covered in this report cause particular forms of harm in different types of area. This section therefore sets out the broad types of area to be examined.
- 3.0.2 Complying with requirements on justifying the extent of any Article 4 area will mean that a finer-grained analysis is required that looks at the specific boundary. This is carried out later in the report in sections 6 and 7 once it has been established what the broad coverage will be.

3.1 Town centre core

- 3.1.1 The town centre core is the area with the greatest concentration of commercial activity in the centre of Reading. This commercial activity includes, in particular, retail, restaurants and cafes, drinking establishments and nightclubs, leisure uses and offices. Whilst other uses, including residential, are present, often at high density, it is this concentration of commercial activities that defines the area.
- 3.1.2 The town centre core is centred around streets such as Broad Street, Friar Street, Station Road, Queen Victoria Street and the areas around Reading Station and the Oracle and Broad Street Mall shopping centres. This is generally an area of high-density development (although densities are somewhat lower in areas of particular historic significance), and is the location for a number of tall buildings.

3.2 Town centre fringe

- 3.2.1 The town centre fringe includes those areas immediately surrounding the town centre core. Whilst this includes secondary commercial locations along the main routes in and out of central Reading, such as Oxford Road, Caversham Road, Kings Road and London Street, much of the areas in between those routes has a more residential focus. There are also a number of large format commercial sites such as retail warehouses and older industrial or business premises.
- 3.2.2 The density of much of the town centre fringe tends to be medium to high. The residential areas include Victorian terraced housing alongside more modern development, including some tall buildings, and the area is currently seeing significant change with large developments underway at Kenavon Drive, Weldale Street, Cardiff Road and Napier Road. There remain some significant areas of underused land which the Local Plan allocates for further development. The town centre fringe has been the focus for many of the office to residential developments that have already taken place under prior approval, with Kings Road, Queens Road and London Street being particularly significant in this regard.

3.3 District and local centres

- 3.3.1 There are a number of small centres which provide essential shops and services to their surrounding residential areas. There are 18 such centres defined in the Reading Borough Local Plan, ranging from large clusters of activity such as Caversham centre or Oxford Road West to small shopping parades such as Wensley Road.
- 3.3.2 These centres tend to have a diversity of uses, including some or all of convenience shops, public houses, hairdressers, cafes, takeaways, medical facilities, places of worship and community centres. Often they include, or are close to, other community facilities such as primary schools. They also often include residential uses, within the centre and also above shop units.

3.4 Main arterial routes

- 3.4.1 This area comprises the main roads in and out of Reading, and the sites that are immediately adjacent to them, where they are not already covered by other categories such as district and local centres and core employment areas. Some of these routes, such as London Road, Oxford Road and Bath Road tend to have a mix of uses along them, including some commercial premises and residential, whilst others, such as Upper Woodcote Road and Peppard Road are mainly residential in character. However, these roads see significant volumes of vehicular traffic which could negatively affect new residents of any residential development that results from PDR.

3.5 Employment areas

- 3.5.1 The main employment areas are the areas identified in the Reading Borough Local Plan as being the most important for supporting the economy of Reading and which need to be retained in employment use (referred to in the Local Plan as Core Employment Areas). Evidence to inform the Local Plan looked at a variety of factors to identify which employment areas should be retained, and which could be brought forward for other uses, and the core employment areas were those that were important to retain.
- 3.5.2 A number of these areas include a wide mix of employment uses, incorporating industrial, warehouses and offices, as well as other commercial activities, and also include older premises alongside more modern developments. In particular, the areas around Basingstoke Road, Portman Road and Cardiff Road offer this type of mixed space, and this includes dedicated small business space. This designation also covers modern out of centre business parks, specifically Green Park and Reading International Business Park, although many of Reading's other business parks are actually outside the Borough boundaries, within Wokingham and West Berkshire. There are also some smaller, older industrial areas which are often in areas where provide jobs to residents within nearby areas of deprivation.

3.6 Other commercial areas

3.6.1 The other commercial areas are those areas which are not covered in any of the previous categories but which nonetheless provide primarily commercial activity and from which residential is generally absent. These include out of centre retail warehouse parks, employment areas not covered by the Core Employment Area designation, concentrations of vehicle dealerships, out of centre leisure destinations and railway depots.

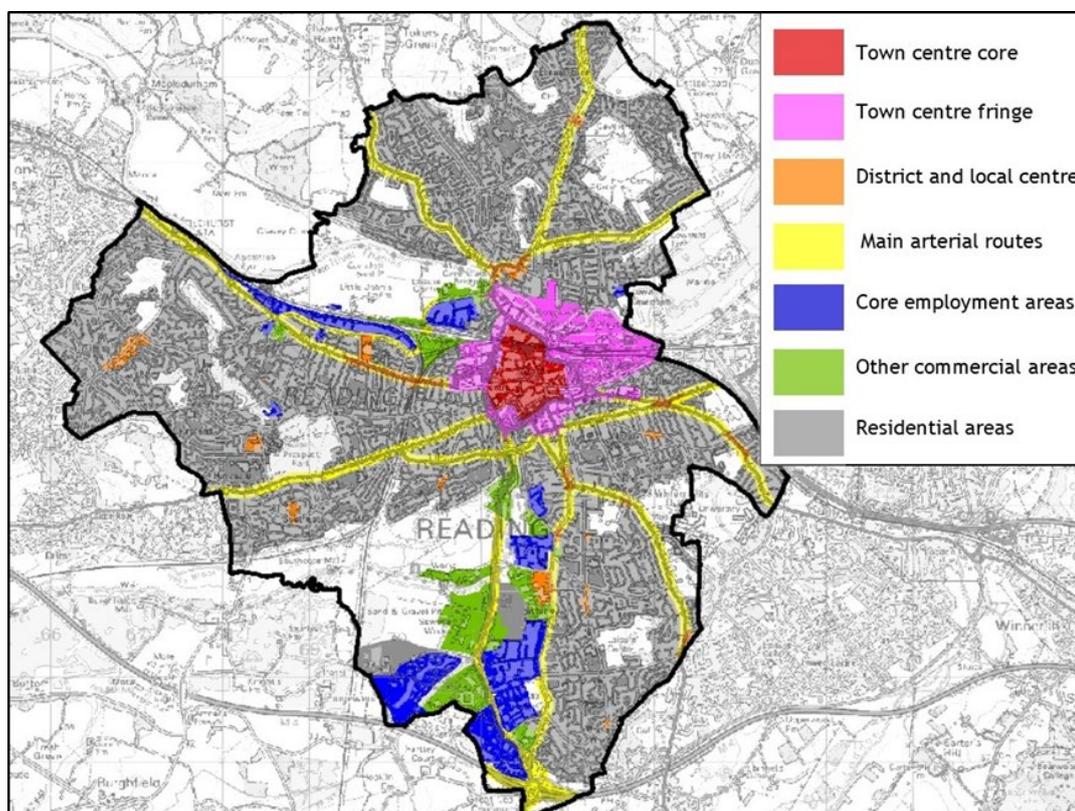
3.7 Residential areas

3.7.1 Residential areas cover most of Reading Borough. These include higher-density residential closer to the centre, with more suburban development further out. These areas also include non-residential uses, in particular most of Reading's schools, and other institutions such as the University of Reading and Royal Berkshire Hospital.

3.8 Broad location of the areas considered

3.8.1 Figure 3.1 shows, in broad terms, which areas of Reading fall within each of the headings above. As previously stated, exact boundaries will need to be considered later on in this report, so figure 3.1 is indicative only.

Figure 3.1: Broad locations for consideration in Reading



3.8.2 The areas not covered by the previous categories are mainly undeveloped land, usually either parks and playing fields, or land in primarily agricultural use. In the

case of agricultural land, it is worth noting that PDR also exist to turn some agricultural buildings into residential. However, these PDR are not dealt with in this report largely because agricultural buildings are almost non-existent in Reading, so the scope to make use of PDR in the Borough is highly limited.

4. Extent of benefits of PDR

4.0.1 The main point cited in favour of PDR that result in new dwellings is that they boost housing delivery and therefore help to meet housing need. With a policy target of 689 homes per annum in policy H1 of the Reading Borough Local Plan, the delivery of new homes is clearly of great importance to the Council. This section considers the evidence relating to delivery of new homes through PDR and whether it should outweigh the harm demonstrated elsewhere.

4.1 Number of homes

4.1.1 The number of homes delivered through each of the PDR routes over the last ten years is shown in table 4.1.

Table 4.1: Homes delivered through PDR in Reading 2011-2021

Year	Office to residential	Light industrial to residential	Storage and distribution to residential	Retail to residential
2011-12	0	0	0	0
2012-13	0	0	0	0
2013-14	11	0	0	0
2014-15	103	0	0	0
2015-16	254	0	0	0
2016-17	273	0	0	2
2017-18	109	0	3	5
2018-19	188	0	0	5
2019-20	102	1	0	2
2020-21	47	0	0	11
Total 2011-21	1,087	1	3	25
Under construction 31 March 2021	169	6	0	3
Not started 31 March 2021	391	0	0	14

4.1.2 After an initial rush of office to residential schemes in 2015-16 and 2016-17, the amount of dwellings delivered through PDR has reduced somewhat, although it remains a steady source of supply.

Table 4.2: Homes delivered through PDR as a proportion of all homes delivered

Year	Net homes completed total	Net homes completed by PDR	% of homes that are delivered by PDR
2011-12	312	0	0.0
2012-13	474	0	0.0
2013-14	361	11	3.0
2014-15	635	103	16.2
2015-16	751	254	33.8
2016-17	717	275	38.4
2017-18	700	117	16.7
2018-19	910	193	21.2

Year	Net homes completed total	Net homes completed by PDR	% of homes that are delivered by PDR
2019-20	524	105	20.0
2020-21	408	58	14.2
Total 2011-21	5,792	1,116	19.3
Under construction 31 March 2021	1,976	169	9.0
Not started 31 March 2021	3,104	391	13.0

4.1.3 Table 4.2 sets this in the context of all homes delivered. It can be seen that in most years since office to residential PDR was introduced (allowing time for schemes to be brought forward), it has represented 15-20% of all completions, with the exception of the years 2015-16 and 2016-17 when the first tranche of schemes under the new PDR were delivered, and more than a third of all completions were through PDR. However, 2020-21 saw the lowest proportion of all schemes delivered through PDR since 2014, and it seems likely that this will continue to reduce somewhat, with less than 10% of dwellings under construction through PDR.

4.1.4 Therefore, on the face of it, PDR represents a strong source of housing supply in Reading, albeit one which is becoming slightly less important as a proportion of overall supply.

4.1.5 However, if we look at long term trends in housing delivery, it is not clear that PDR has actually served to boost housing supply. Table 4.3 sets out overall housing delivery for a ten-year period before PDR was introduced in 2013, and for the eight years since. There is considerable variation from year to year, so it makes sense to compare longer term averages to see if there has been any uplift in housing delivery. If PDR were to have the effect of boosting housing delivery overall we would expect to see this reflected in the average completions in an authority such as Reading where there has been considerable take-up.

Table 4.3: Total housing delivery in Reading 2003-2021 showing averages before and after introduction of office to residential PDR

Year	Completed dwellings
2003-04	761
2004-05	1177
2005-06	656
2006-07	637
2007-08	837
2008-09	782
2009-10	693
2010-11	321
2011-12	312
2012-13	474
Annual average 2003-2013	665
2013-14	361
2014-15	635

Year	Completed dwellings
2015-16	751
2016-17	717
2017-18	700
2018-19	910
2019-20	524
2020-21	408
Annual average 2013-2021	626

- 4.1.6 Table 4.3 shows that, in actual fact, the average annual completions have declined since 2013, not increased. The average for the ten years prior to the introduction of office to residential PDR is 665 dwellings, whilst for the eight years since it is 626. Whilst it is not possible to know what housing delivery would have looked like without PDR, there is no clear overall boosting effect to housing delivery in Reading.
- 4.1.7 This may be because the relationship between PDR and overall housing delivery is not as straightforward as might be thought at first glance. Conversions or redevelopment of redundant offices or other commercial space to dwellings had been taking place in Reading for many years prior to the introduction of PDR, so there can be no certainty that many of these offices may not have come forward for residential in any case through the planning application route. Equally, developers may have been focused on relatively easy wins through office conversions with no requirement for developer contributions rather than bringing forward other sites, particularly given that the temporary nature of the office to residential PDR when originally introduced may have incentivised this.
- 4.1.8 Records show that existing offices have been a source of new housing delivery in Reading for many years, either through conversion or redevelopment. Table 4.4 shows the number of dwellings that were delivered from this source in each of the 15 years before the introduction of office to residential PDR.

Table 4.4: Dwellings completed as a result of loss of offices before the introduction of PDR

Year	Completed dwellings resulting from conversion or redevelopment of office
1998-1999	64
1999-2000	29
2000-2001	11
2001-2002	108
2002-2003	11
2003-2004	70
2004-2005	33
2005-2006	205
2006-2007	9
2007-2008	201
2008-2009	73
2009-2010	141

Year	Completed dwellings resulting from conversion or redevelopment of office
2010-2011	43
2011-2012	10
2012-2013	29
Total 1998-2013	1,037
Annual average 1998-2013	69

4.1.9 As can be seen from table 4.4, changes from office to residential have long been an important element of housing supply. Over 1,000 dwellings have been delivered from this source over 15 years, an average of 69 each year, and the need to seek planning permission has not prevented many developments coming forward, whilst still ensuring that developments are of an acceptable quality, type, in a suitable location, and that, where appropriate, contributions to affordable housing and infrastructure are made. It is also worth noting that, although the figures above have been collected for offices, conversions or redevelopment from other non-residential uses including retail and storage and distribution have also been a regular occurrence.

4.1.10 It is also worth noting that conversions of the type that PDR sets out to allow do not appear to have been prevented from coming forward in Reading due to the need to seek planning permission even after PDR. Between the introduction of office to residential PDR in 2013 and 2021, 165 dwellings have been delivered through changes of use from office through the planning application route. In some cases these involved permissions that pre-dated office to residential PDR, but some others are conversions within buildings that do not benefit from PDR, usually because they are listed. This, in combination with the information set out in paragraph 4.1.9 about changes from office to residential that pre-dated PDR shows that the need to seek planning permission does not prevent appropriate changes of use occurring.

4.2 Relationship to local need

4.2.1 In addition to doubts about the degree to which PDR has actually boosted the number of homes delivered, there are also reasons to doubt the degree to which those homes that have been delivered respond to the most pressing local needs.

4.2.2 This issue arises in relation to several matters. Firstly, PDR does not result in provision of affordable housing, as the provision of affordable housing is not a matter that the PDR process allows consideration of. Affordable housing is by far the most pressing element of local housing need, and PDR does not make any contribution to meeting it. This issue is explored in more depth in section 5.8 when discussing harm.

4.2.3 Secondly, there is no ability to influence the mix of housing provided in terms of number of bedrooms to ensure that the greatest needs are met. PDR developments are dominated by small dwellings, usually of 1-bedroom, and do not provide

significant levels of much-needed family housing. This issue is explored in detail in section 5.1.

- 4.2.4 Thirdly, there is evidence that PDR developments are often being used to provide serviced accommodation on short-term lets rather than provide for those households needing permanent residential accommodation. Serviced accommodation does nothing to meet local housing need, being marketed instead at those in Reading for the short-term, often for business reasons, and being priced at a level that would not be sustainable for most households as long-term accommodation.
- 4.2.5 An assessment of the listings on websites specialising in serviced lets undertaken in May 2021 revealed that, of the 78 residential buildings that had been provided by office to residential permitted development rights up to 31st March 2021, at least 12 of those buildings (15%) contained dwellings being let for serviced accommodation. Information was not available on how many dwellings within each of those blocks were used as serviced accommodation, as often one listing relates to an unspecified number of flats, and some flats appear on multiple listings, but in the case of some of the smaller PDR blocks of less than 15 dwellings, it appeared to relate to the whole building.
- 4.2.6 This is not an issue that is restricted to PDR developments, but PDR developments would appear to have particular potential to be used for serviced apartments, in particular because those staying for a temporary period are less likely to require private or communal outdoor amenity space, are less likely to be concerned about matters such as noise and disturbance, and are also likely to only require one-bedroom accommodation, which dominates PDR developments. Whilst it could be argued that use as serviced apartments would represent a breach of planning control as it would represent an unauthorised change of use, this would be difficult to satisfactorily prove, as well as the scale of the issue making enforcement action difficult.
- 4.2.7 Similarly, it is known that some PDR developments are being used to provide student accommodation. The proliferation of private purpose-built student accommodation (PBSA) in Reading in recent years has been a matter of considerable concern for the Council because it competes for a limited pool of sites with general housing to meet the more pressing local needs. This led to the adoption of a sequentially-based policy on student accommodation in the Reading Borough Local Plan (policy H12) which directed new accommodation towards existing further or higher education sites or existing student accommodation sites in the first instance. This matter was subject to considerable discussion at examination, and the approach adopted, albeit with main modifications.
- 4.2.8 Three blocks completed through PDR in particular are known to currently provide student accommodation:
- Building 1, New Century Place, East Street - 72 units
 - Building 2, New Century Place, East Street - 63 units

- St Giles Court (now known as Saxon Court), Church Street - 89 units

4.2.9 This means that, of the 1,116 dwellings delivered through PDR since 2013, 224 of these dwellings, representing 20% of the total, are in use as student accommodation rather than general housing, and are not therefore addressing general local housing needs.

4.2.10 The Council has sought to take enforcement action relating to these uses, and this resulted in an appeal decision against a failure to determine a certificate of lawful use for the use of the New Century Place buildings. The appeal was allowed², and this illustrated the difficulty of taking action to address the issue, as the Inspector considered that the use did not constitute dedicated student accommodation under sui generis, despite the rental periods being linked to academic terms.

4.2.11 As for serviced accommodation, whilst this issue may not be unique to dwellings provided by PDR, that type of development has clear potential to be geared towards students, who may seek 1-bed or studio accommodation and are less likely to require private or communal outdoor amenity space.

4.3 Conclusion

4.3.1 Therefore, there is good reason to be cautious about the mooted benefits of PDR in terms of providing dwellings to meet local need, firstly because it is not clear that the delivery of homes has been significantly boosted by PDR in terms of overall numbers, and secondly because it appears that many of the dwellings provided do not respond to the most pressing local housing needs.

² APP/E0345/X/20/3262741

5. The harm caused by PDR

5.0.1 This section examines the different forms of harm caused by PDR, and sets out evidence for how this harm arises, or could arise, in Reading. It therefore contains the bulk of the evidence justifying use of an Article 4 direction. It takes each form of harm in turn, examines its severity and whether it would constitute “*wholly unacceptable adverse impacts*” as required by the NPPF for a direction controlling changes of use to residential, and considers the degree to which it arises for each form of PDR set out in section 2 and within each geographical area set out in section 3.

5.1 Size and type of dwellings

5.1.1 This section considers whether the size of dwellings resulting from permitted development is likely to match the need for new dwellings in Reading. In this section, size relates to number of bedrooms, not internal space. Internal space is addressed in the following section 5.2.

5.1.2 The need for different sizes of dwellings in Reading has been assessed to inform the production of the Reading Borough Local Plan. The Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA)³, February 2016, was the main piece of housing evidence that was used to underpin the Local Plan. As well as assessing the overall need for dwellings and other forms of residential accommodation, the SHMA looked at the split of housing required by size of dwelling. The methodology is set out in section 8 of the SHMA, with the specific figures for Reading shown in tables 107 and 108. The results for Reading across the whole plan period (2013 to 2036) are shown in table 5.1 below.

Table 5.1: Size of dwellings required in Reading, 2013-2036 (from SHMA)

Size of dwelling	Market homes needed	Affordable homes needed	Total homes needed	% of total homes needed
1-bedroom	1,066	1,490	2,556	18.6%
2-bedroom	3,053	1,129	4,182	30.5%
3-bedroom	4,277	741	5,018	36.5%
4-bedroom or more	1,903	72	1,975	14.3%
Total	10,299	3,433⁴	13,732	100.0%

5.1.3 The overall mix required in Reading according to the SHMA is spread across all sizes of dwellings, with 3-bedroom dwellings representing the greatest need followed by 2-bedroom dwellings. Over 50% of need is for family-sized accommodation, i.e. of 3-bedroom or more. The need for 1-bedroom dwellings represents less than a fifth of overall need.

³ [Berkshire Strategic Housing Market Assessment Feb 2016.pdf \(reading.gov.uk\)](#)

⁴ In the part of the SHMA focussing on size of accommodation, the split between market and affordable homes does not reflect the assessed need for affordable housing in the same document, but instead assumes that 25% of overall delivery will be affordable for the purposes of reflecting more likely delivery.

5.1.4 However, delivery of new dwellings since the start of the plan period has not reflected the mix needed. Table 5.2 shows the number of dwellings that have been completed of each size since 2013 (the start date of the plan and therefore the date from which needs have been calculated). The focus has clearly been heavily on smaller accommodation, with 82% of new dwellings of less than three bedrooms. The amount of studio and one-bedroom dwellings (2,215) is already approaching the entire assessed need for this size of dwelling for the entire plan period (2,556, from [table 5.1](#)), and has already easily exceeded the identified market need for these sizes by more than double.

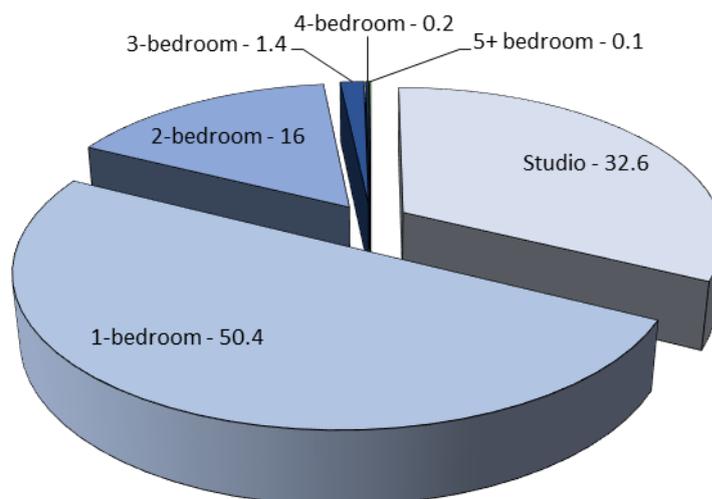
Table 5.2: Size of dwellings delivered 2013-2021

Size of dwelling	Total completed 2013-21	% of all completions 2013-21	Completed through PDR 2013-21	% of PDR completions 2013-21
Studio	481	9.6	364	32.6
1-bedroom	1,734	34.7	563	50.4
2-bedroom	1,866	37.3	179	16.0
3-bedroom	623	12.5	7	1.4
4-bedroom	325	6.5	2	0.2
5-bedroom or more	-26	-0.5	1	0.1
Total	5,003	100.0	1,116	100.0

5.1.5 Against this background, the Council needs to use the tools available to try to secure family-sized accommodation, particularly of three bedrooms or more. Policy H2 of the Local Plan requires that over half of new-build dwellings outside town centres are three-bedroom or more, whilst policy CR6 sets more specific housing mix expectations for the centre of Reading, but as can be seen from the figures above, this has so far had a limited effect on overall delivery.

5.1.6 PDR have overwhelmingly delivered small dwellings. Of all dwellings delivered through PDR in Reading between 2013 and 2021, 83% have been either studio or 1-bedroom, with almost all of the remainder 2-bedroom. The number of 3-bedroom dwellings or more delivered through the PDR route has been negligible. Figure 5.1 underlines this dominance of small dwellings, and shows the percentage of completions through PDR that are of each size category.

Figure 5.1: Percentage of completed dwellings through PDR 2013-21 by size



- 5.1.7 The proportion of studio flats created is particularly noticeable. PDR is responsible for over 75% of all studio flats that have been provided in Reading over the plan period. This is a form of accommodation that is rarely sought through the planning application process, with many of the remaining studios resulting from regularisation of existing development.
- 5.1.8 There is no reason to believe that this dominance by smaller dwellings is likely to change. Maximising the number of units within a development will often help to maximise the return to a developer, so, without any controls through a full planning permission process, there are few incentives to deliver larger units that could potentially house families. This is exacerbated by other aspects of PDR, for instance the lack of provision of outdoor amenity space which makes PDR developments particularly unsuitable for families.
- 5.1.9 Therefore, in summary, the dominance of small dwellings amongst PDR makes it more difficult to meet the significant needs for family-sized accommodation in Reading, and therefore actively works against meeting the requirements of the Local Plan.

Wholly unacceptable adverse impacts

- 5.1.10 Reading clearly needs more family housing, as demonstrated in the evidence base prepared for the Local Plan, and the housing that is being provided so far is not delivering family housing in sufficient numbers. This is significantly exacerbated by PDR developments that are absolutely dominated by studio and one-bedroom dwellings and are subject to no controls over housing mix. The NPPF is clear that “*the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies*” (paragraph 62), and this is undermined by the continued significant supply of PDR dwellings. A failure to address the need for family housing will impact on the whole community, as it will mean that households will need to move out of Reading as their space needs change, which will have significant additional implications for the mix and

balance of our communities and for economic growth through difficulties in attracting and retaining workers with families.

Relevance to types of PDR

5.1.11 There is no ability to control size in terms of number of bedrooms through any of the permitted development rights that would result in new dwellings. Therefore, this issue is equally relevant to all forms of PDR.

Table 5.3: Matrix showing applicability of size and type of dwellings to different forms of PDR

Permitted development right	Relevant to issue?
Part 3 Class MA - use class E to residential	✓
Part 3 Class M - takeaway, betting office, payday loan shop or launderette to residential	✓
Part 3 Class N - casino or amusement arcade to residential	✓
Part 20 Class ZA - demolition and rebuild for residential	✓
Part 20 Class A - upward extension of purpose-built flats for residential	✓
Part 20 Class AA - upward extension of detached commercial or mixed use building for residential	✓
Part 20 Class AB - upward extension of terraced commercial or mixed use building for residential	✓
Part 20 Class AC - upward extension of terraced house for residential	✓
Part 20 Class AD - upward extension of detached house for residential	✓

Relevance to types of area

5.1.12 The issue of developments resulting from PDR being dominated by smaller residential dwellings is equally applicable in all locations.

Table 5.4: Matrix showing applicability of size and type of dwellings to different areas

Type of area	Relevant to issue?
Town centre core	✓
Town centre fringe	✓
District and local centres	✓
Main arterial routes	✓
Employment areas	✓
Other commercial areas	✓
Residential areas	✓

5.2 Dwelling standards

5.2.1 There are a significant number of concerns around the quality of dwellings that result from PDR. In amending PDR requirements to ensure that natural light is provided to habitable rooms and that developments comply with the nationally described space standards, the government has recognised that some of these concerns are justified. However, many concerns around quality are unresolved. Some dwellings provided through PDR may of course be very high quality where this is what a developer wishes to provide, but far too many PDR dwellings are of an unacceptable level of quality and the local planning authority does not have the levers to control this quality without an Article 4 direction.

5.2.2 Some of the main concerns around quality and standards of new dwellings are set out in the following sections.

Dwelling dimensions

5.2.3 The small size of dwellings provided through PDR in terms of internal dimensions has been well documented across the country. The lack of any controls over the size of dwellings provided has resulted in office blocks being converted into large numbers of extremely small residential units, which do not give anywhere near sufficient space to provide an adequate quality of life.

5.2.4 In 2018, Reading was one of five English case study authorities for a report on the office to residential PDR by RICS, prepared by a team from University College London⁵. The authors looked at a selection of case study conversions that had already taken place at that point, and one of the issues that was considered was internal dimensions. Of the dwellings where it was possible to tell, none of the 178 units met the nationally described space standards.

5.2.5 Identifying the size of dwellings provided in Reading as a result of PDR so far is not straightforward, as developers are not required to provide floorplans at prior approval stage. However, dwellings of 15-17 sq m are not at all unusual. The smallest dwelling so far provided that could be identified was 13.6 sq m, which is within the development at 34-36 Crown Street (application reference 160090). For comparison, the minimum Gross Internal Area for a one-storey, one-person dwelling in the nationally described space standards is 37 sq m, so much more than double the smallest units provided. There is no prospect that dwellings of the small size seen so far would be permitted in Reading through the planning application route.

5.2.6 Whilst the internal size of dwellings completed or already agreed through PDR is of significant concern to the Council, we are aware that, in order to benefit from PDR, any applications for prior approval submitted from 6th April 2021 that would result in new dwellings (including all forms considered in this report) will need to comply with the nationally described space standards. This essentially resolves the

⁵ [assessing-the-impacts-of-extending-permitted-development-rights-to-office-to-residential-change-of-use-in-england-rics.pdf](#)

Council's concern about this aspect of the quality of dwellings, and means that internal dimensions do not form a part of the basis for an Article 4 direction. It also means that this issue is not explored as fully here as it would otherwise have been. Any removal of the requirement to comply with space standards in the future may result in the Council re-assessing this position.

Outdoor amenity space

- 5.2.7 Access to private or communal outdoor space can make a vital contribution to a high quality of life. In addition to providing opportunities for outdoor living and enjoyment, amenity space serves functional requirements, such as refuse storage and clothes drying. The Covid-19 pandemic and associated restrictions has brought home the importance of having access to outdoor amenity space to our mental and physical well-being, particularly in dense urban environments such as Reading, but this has always been, and will continue to be, of great importance.
- 5.2.8 The Reading Borough Local Plan emphasises the importance of new dwellings being provided with private or communal outdoor amenity space. Policy H10 requires that:
- “Dwellings will be provided with functional private or communal open space, including green space wherever possible, that allows for suitable sitting-out areas, children’s play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.”*
- 5.2.9 However, there is no scope within the prior approval process to require PDR developments to provide outdoor amenity space for their residents, and whether or not such space is provided is left entirely up to the developer. The need for such space is accentuated by the small size and often poor quality of many dwellings in PDR developments, and by the fact that there is no mechanism to secure funding for additional or upgraded public open space to mitigate the impacts of PDR developments.
- 5.2.10 In the 2018 RICS report, for which Reading was a case study authority, the authors looked in detail at four of the conversions that had taken place and made site visits that included noting whether or not outdoor amenity space was provided. It found that, whilst St Giles’ House (Church Street, 89 dwellings) and 81-83 School Road (6 dwellings) had a communal garden or courtyard, Garrard House (Garrard Street, 83 dwellings) and King’s Reach (Kings Road, 72 dwellings) had no private or communal outdoor space. This meant that only 38% of the units surveyed had any outdoor amenity space.
- 5.2.11 The 2018 study was a small selection of the developments that had taken place at that point. The Council has now carried out a full assessment of all 103 PDR developments that have been completed in Reading between 2013 and 2021 to

examine whether or not functional private or communal amenity space is provided. In this case, amenity space includes balconies (other than juliet balconies) and roof gardens, but does not include areas used for car parking. This assessment has not involved specific site visits, and instead relies on a combination of plans available and aerial and mapping information.

5.2.12 Table 5.5 sets out the results of the assessment. It can be seen that the proportion of dwellings provided by PDR between 2013 and 2021 that has functional outdoor amenity space is significantly lower than estimated in the 2018 report, at only 19.1%. Even in the minority of cases where it is provided, it is almost always minimal in terms of area.

5.2.13 Policy H10 additionally asks for green space as part of private and communal outdoor space, which can be important for mental health and quality of life. However, even when private or communal outdoor space is provided, this rarely includes green space. Only 7.8% of dwellings provided between 2013 and 2021 included private or communal green outdoor space.

Table 5.5: Provision of private and communal outdoor space for PDR dwellings in Reading 2013-2021

Presence of outdoor amenity space	Number of dwellings	Percentage of total PDR dwellings
All dwellings completed through PDR	1,116	N/A
Dwellings completed through PDR with access to private or communal outdoor space	213	19.1%
Dwellings completed through PDR with access to private or communal outdoor space including green space	87	7.8%

5.2.14 As has been seen in section 5.1, there is a particular need for family-sized accommodation within Reading, in particular of three bedrooms or more. Development provided through PDR, as well as rarely being of sufficient size, cannot help to meet these significant needs where it fails to provide outdoor space for children to play, and, without a trigger for seeking infrastructure contributions, there is no mechanism for funding open space and play infrastructure off site that can compensate for this deficiency.

5.2.15 An additional indirect implication of the lack of provision of outdoor amenity space is that PDR developments often result in communal parking areas being located directly adjacent to ground floor habitable rooms of dwellings, without any amenity space as a buffer. This has noise and disturbance implications for residents.

5.2.16 Therefore, it is clear that the lack of private and communal outdoor amenity space associated with PDR developments is clearly prejudicial to the proper planning of the area.

Windows and natural light

- 5.2.17 Another issue in terms of quality of dwellings created by PDR was that, until recently, there was no requirement to provide natural light to habitable rooms. This has meant that there is scope to provide dwellings with no windows or natural light in any form.
- 5.2.18 All forms of PDR considered in this report now require as a condition of the PDR that adequate natural light is provided to all habitable rooms. This is undoubtedly an improvement over previous forms of PDR. However, natural light does not necessarily entail windows that give residents an outlook, and can instead be provided by skylights, or high level and/or obscure glazed windows. An inability to look out of a window can contribute to an overall sense of confinement (in particular in conjunction with limited internal space and lack of outdoor amenity space) and negatively impact on quality of life and mental health. Dwellings without windows that give an outlook remain permissible under all forms of PDR.
- 5.2.19 Although reports of dwellings without windows have been highlighted elsewhere in England, no specific examples have been identified in Reading of PDR developments that have completed so far. However, that is not to say that the windows that have been provided have been necessarily adequate, and this assessment would require more information than is currently available.
- 5.2.20 The Council remains concerned about the possibility of developments being provided that meet natural light requirements only by means of skylights or high level or obscure-glazed windows, and therefore considers that the inadequacy of the natural light requirements contributes to the reasoning for control of PDR by an Article 4 direction.

Accessibility and adaptability

- 5.2.21 Among the optional housing standards which local planning authorities can opt into in their Local Plans are the two different standards for accessibility and adaptability. These are accessible and adaptable dwellings under part M4(2) of the building regulations, and wheelchair accessible and adaptable dwellings under part M4(3).
- 5.2.22 The Reading Borough Local Plan applies these standards within policy H5 (Housing Standards). It requires that all new build dwellings are accessible and adaptable in line with M4(2) and that 5% of dwellings in new build developments of 20 dwellings or more are wheelchair accessible and adaptable in line with M4(3).
- 5.2.23 Whilst M4(2) and M4(3) are set out within the Building Regulations, the mechanism by which they can be applied to a specific development is by planning condition. Without such a planning condition, there is no ability to require compliance with these standards, and a planning condition cannot be applied to a prior approval as accessibility and adaptability are not matters that can be considered in prior approval. Changes of use to residential under Part 3 (Class MA, M and N) would not be required to comply with these standards even if permission were required as

they are not new-build, but the developments under Part 20 would need to comply with these standards if permission were needed.

- 5.2.24 The evidence that supported applying these standards was set out in the Local Plan Background Paper (2018). This cited information set out in the Berkshire SHMA that forecast a 78.1% increase in people with mobility problems to 2036, to a total of 6,254. It also considered the number of registrations for Personal Independence Payments (PIP) in Reading, which, at 5,163 exceeded all other authorities in the South East except coastal authorities along the south coast and in Kent, and Milton Keynes.
- 5.2.25 The purpose of M4(2) is to ensure that new dwellings include a relatively simple set of design measures that can enable occupants to make adaptations to their dwellings as their circumstances change and mean that they do not need to move out into more specialist accommodation. Because it is not possible to predict which dwellings will need these adaptations, the Local Plan takes the view that all new-build dwellings should incorporate these measures. New-build dwellings that do not provide these measures increase the likelihood of occupants needing to move out as circumstances change, and potentially result in a need for provision of more specialist housing.
- 5.2.26 In terms of M4(3), which includes more extensive accessibility and adaptation measures, the need identified in the Local Plan Background Paper using a methodology proposed by Habinteg⁶ is for 460 wheelchair accessible and adaptable dwellings between 2013 and 2036, which equates to 2.9% of the identified housing need. Meeting this need does not necessarily rely on the type of developments now covered by PDR, but the larger a proportion of dwellings delivered that comes through PDR, the more onus is placed on other developments in meeting that need.

Sustainable design and construction

- 5.2.27 Reading Borough Council declared a climate emergency in February 2019, and stated its intention to work towards Reading being a net climate zero town by 2030. A Climate Emergency Strategy was produced in 2020, which included as one of its actions the introduction of high standards of energy efficiency for new development. There is little prospect of being able to achieve net zero if new development does not play its part.
- 5.2.28 As part of its Local Plan, the Council introduced demanding new expectations for the sustainability of new developments, and these are considered an essential part of the response to the climate emergency. For residential developments, the energy and emissions requirements are summarised below:
- For new-build residential developments of 10 dwellings or more, the expectation in policy H5 is that new homes will be built to zero carbon standards. In this case, that means a 35% improvement over the 2013 Building

⁶ See pages 127 to 129 of the [Local Plan Background Paper](#)

Regulations dwelling emissions rate with the remaining emissions subject to a financial contribution towards carbon offset, secured by Section 106 agreement;

- For new-build residential developments of less than 10 dwellings, policy H5 requires a 19% improvement over the 2013 Building Regulations dwelling emissions rate;
- For major conversions to residential of 10 dwellings or more, policy CC2 requires that it be developed to BREEAM Excellent standards;
- For minor conversions to residential of less than 10 dwellings, policy CC2 seeks development at BREEAM Very Good standards.

5.2.29 Were planning permission to be required for the forms of PDR dealt with in this report, the new build standards in policy H5 would be applied to the types of development covered under Part 20 of the GPDO, whilst the conversion standards in policy CC2 would be applied to the changes of use under Part 3.

5.2.30 However, the Council would not be able to secure these standards for PDR developments. These requirements are generally secured through a planning condition, with a Section 106 agreement covering carbon offset contributions, but none of these can be attached to a prior approval. PDR developments would only need to comply with the current Building Regulations. These are currently wholly inadequate to address the climate emergency, and, whilst a Future Homes Standard is proposed that would significantly increase the energy and emissions performance of new dwellings, this is not expected to be in place until 2025.

5.2.31 In addition, policy H5 of the Local Plan requires that all new-build residential dwellings comply with the optional higher standard for water efficiency in the Building Regulations of 110 litres per person per day. This is because the Thames Water area is classed as a 'water-stressed area' by the Environment Agency, and the Thames River Basin Management Plan stresses the importance of demand management in the area. The mechanism by which this requirement is applied through the Building Regulations is a planning condition, and, where such a condition is not applied, as would be the case in a prior approval, in particular because sustainable design and construction is not listed as a matter that can be considered, this higher standard will not apply.

5.2.32 Therefore, homes delivered under PDR are likely to continue to represent an obstacle to the vital objective of achieving a net zero carbon Reading by 2030.

Other matters

5.2.33 There are a number of other matters where the quality of dwellings provided under PDR will not necessarily reflect the level of quality of homes that have been provided through the planning permission route.

5.2.34 In terms of **impacts on residential amenity**, such as privacy, overlooking and light, these are issues that are touched upon in some of the conditions of prior approval, but are not consistent across the various PD rights. For demolition and rebuild

(class ZA), impacts on residential amenity for residents of the new and neighbouring buildings are both included, but for the PD rights for upward extension (class AA, AB, AC and AD) only the impacts on the residential amenity of neighbouring dwellings are covered, not the impacts on the amenity of the dwellings to be provided as part of the development. There are instances where upward extension could result in privacy issues for these additional storeys (for instance where there is a change in levels), and this requires consideration through the planning application process.

- 5.2.35 There is no mention at all of residential amenity as a condition of the PDR rights for changes of use to residential. There is a clear opportunity for harm to arise in these circumstances. Office buildings, particularly in a dense town centre environment such as Reading, are unlikely to have been designed with privacy in mind, meaning that windows between offices may well be closer together than would be necessary to maintain privacy, whilst it is often possible to look directly into ground floor or basement offices whilst walking through the town centre. Meanwhile, a number of conversions have involved small commercial buildings such as workshops within otherwise residential areas, which often back onto residential gardens. Placement of windows in a new dwelling within such buildings can have clear implications for privacy and overlooking of both new and existing dwellings.
- 5.2.36 The **internal layout** of residential developments is another matter that cannot be controlled through PDR. Within new-build developments, for instance, planning decisions would generally avoid locating bathrooms and kitchens above or below bedrooms of neighbouring properties. This is also a matter which is considered in conversions to residential and is identified in both policy H8 (Residential Conversions) of the Local Plan and the Residential Conversions SPD, with stacking of similar rooms clearly preferable. Without any control over internal layout, combined with the conversion of buildings that may not lend themselves particularly well to satisfactory residential use, there is significant scope for issues to arise between properties within a single block.

Wholly unacceptable adverse impacts

- 5.2.37 The standards that are sought for new residential developments are sought for good reason. Adequate outdoor amenity space and provision of windows are essential to securing an adequate quality of life and ensuring the physical and mental health of inhabitants. Continuing to enable new housing that fails to meet these standards will continue to result in a poor quality stock which fails to provide the basic requirements of a home. Standards around accessibility and adaptability ensure that sufficient housing stock is available for those in need of wheelchair accessible homes, and that adaptations can be made to housing as life circumstances change. Finally, exacting standards on emissions are in place to tackle the climate emergency, one of the greatest issues faced worldwide. All of these standards are entirely reasonable and deliverable, and it is wholly unacceptable that a specific form of development without controls continues to subvert the need to comply with them.

Relevance to types of PDR

5.2.38 There is no ability to influence housing standards through any of the PDR that would result in new dwellings. Therefore, this issue is equally relevant to all forms of PDR.

Table 5.6: Matrix showing applicability of housing standards to different forms of PDR

Permitted development right	Relevant to issue?
Part 3 Class MA - use class E to residential	✓
Part 3 Class M - takeaway, betting office, payday loan shop or launderette to residential	✓
Part 3 Class N - casino or amusement arcade to residential	✓
Part 20 Class ZA - demolition and rebuild for residential	✓
Part 20 Class A - upward extension of purpose-built flats for residential	✓
Part 20 Class AA - upward extension of detached commercial or mixed use building for residential	✓
Part 20 Class AB - upward extension of terraced commercial or mixed use building for residential	✓
Part 20 Class AC - upward extension of terraced house for residential	✓
Part 20 Class AD - upward extension of detached house for residential	✓

Relevance to types of area

5.2.39 The issue of the unacceptable standards of housing resulting from PDR is equally applicable in all locations.

Table 5.7: Matrix showing applicability of housing standards to different areas

Type of area	Relevant to issue?
Town centre core	✓
Town centre fringe	✓
District and local centres	✓
Main arterial routes	✓
Employment areas	✓
Other commercial areas	✓
Residential areas	✓

5.3 Noise, disturbance and other environmental nuisance

5.3.1 The Council is concerned that use of PDR can lead to residential development being placed in locations where it is subject to environmental impacts that can have a detrimental effect on quality of life. This section explores the degree to which that

has been borne out by developments that have already taken place and the potential for future impacts.

Evidence from completed developments

5.3.2 The Council has records of environmental and nuisance complaints that are received. It is therefore possible to examine the developments that have already taken place through PDR and consider the degree to which such complaints have been generated. It is worth bearing in mind that this is an indicator only, as simply receiving a complaint does not necessarily mean that there is a fundamental issue. However, it can give an idea of the scale of possible issues, and where they crop up most frequently.

5.3.3 Table 5.8 shows all developments of five or more dwellings in Reading that were delivered through the PDR route more than a year ago (to allow time for the dwellings to be occupied). In all cases, these have been through the office to residential PDR route. The table shows the number of environmental protection and nuisance complaints received by residents of the development in that time. The addresses of the buildings are not shown to reflect the sensitivity of the information. Instead, the table shows the size of each development (whether 5-9 dwellings, 10-19, 20-29, 30-39, 40-49 or more than 50) and the broad type of location, as described in section 3, to allow more general analysis.

Table 5.8: Environmental protection and nuisance complaints received from existing PDR developments

Building	Location type	Size range	Number of complaints (period)	Issues
Building 1	Town centre fringe	5-9 dwellings	1 complaint in six years	Noise from construction site
Building 2	Town centre core	10-19 dwellings	3 complaints in six years	Noise from construction site; noise from building alarm; noise from smoke alarm
Building 3	Main arterial road	40-49 dwellings	0 complaints in six years	N/A
Building 4	Town centre fringe	5-9 dwellings	0 complaints in six years	N/A
Building 5	Town centre core	5-9 dwellings	1 complaint in six years	Noise from neighbours
Building 6	Main arterial road	5-9 dwellings	0 complaints in five years	N/A
Building 7	District or local centre	5-9 dwellings	0 complaints in five years	N/A

READING BOROUGH COUNCIL - EVIDENCE FOR PROPOSED ARTICLE 4 DIRECTION
RELATING TO PERMITTED DEVELOPMENT RIGHTS FOR NEW RESIDENTIAL DWELLINGS

Building	Location type	Size range	Number of complaints (period)	Issues
Building 8	Town centre core	20-29 dwellings	3 complaints in five years	Noise from outdoor events; noise from commercial premises; rats
Building 9	Town centre fringe	40-49 dwellings	0 complaints in five years	N/A
Building 10	Town centre core	10-19 dwellings	2 complaints in five years	Noise from pubs and clubs; noise from street
Building 11	Town centre fringe	5-9 dwellings	0 complaints in five years	N/A
Building 12	Town centre fringe	10-19 dwellings	0 complaints in five years	N/A
Building 13	Town centre fringe	50 dwellings or more	2 complaints in five years	Noise from neighbours
Building 14	District or local centre	5-9 dwellings	0 complaints in five years	N/A
Building 15	Town centre core	5-9 dwellings	0 complaints in five years	N/A
Building 16	Town centre core	30-39 dwellings	10 complaints in four years	Noise from roadworks; noise from outdoor activities; noise from air conditioning; noise from bin stores; odour from smoking.
Building 17	Main arterial road	50 dwellings or more	0 complaints in four years	N/A
Building 18	Town centre core	20-29 dwellings	0 complaints in four years	N/A
Building 19	Town centre core	40-49 dwellings	0 complaints in four years	N/A
Building 20	Main arterial road	5-9 dwellings	0 complaints in four years	N/A
Building 21	Town centre fringe	10-19 dwellings	0 complaints in four years	N/A
Building 22	Town centre core	50 dwellings or more	1 complaint in four years	Light from commercial building
Building 23	Town centre core	50 dwellings or more	2 complaints in three years	Noise from commercial premises; noise from construction site.

Building	Location type	Size range	Number of complaints (period)	Issues
Building 24	Town centre fringe	10-19 dwellings	0 complaints in three years	N/A
Building 25	Town centre fringe	10-19 dwellings	0 complaints in two years	N/A
Building 26	Town centre fringe	10-19 dwellings	0 complaints in two years	N/A
Building 27	Town centre fringe	5-9 dwellings	1 complaint in two years	Noise from construction site
Building 28	Town centre fringe	5-9 dwellings	0 complaints in two years	N/A
Building 29	Town centre fringe	50 dwellings or more	0 complaints in two years	N/A
Building 30	Town centre fringe	50 dwellings or more	0 complaints in two years	N/A
Building 31	Main arterial road	50 dwellings or more	0 complaints in one year	N/A
Building 32	Town centre fringe	10-19 dwellings	0 complaints in one year	N/A

- 5.3.4 The results show that, of the locations where developments through PDR have taken place, it is the core of the town centre where the greatest issues exist. All but one of the buildings whose residents have raised two or more environmental protection or nuisance complaints are in the town centre core. No such complaints have been received from developments in district or local centres or on main arterial roads.
- 5.3.5 It is clear that the main issues that have arisen are in relation to noise. Some of the noise complaints that have arisen are typical of the type of issue that come with the mix of uses and activities inherent in a town centre environment. Noise from nearby commercial premises, including pubs and clubs, has arisen, as has noise from the type of outdoor events and activities that make up a key part of the town centre offer. Construction activity and roadworks are frequent in the town centre, and this is again something that has been raised from more than one property.
- 5.3.6 Other types of complaints that have been received involve artificial light from adjoining commercial premises, odour from neighbouring employees smoking and the presence of rats associated with food and drink uses. Again, these are the types of issues that can regularly arise in a town centre environment.
- 5.3.7 That is not to say that the town centre is an inappropriate place for residential development. Whilst planning decisions are likely to seek to avoid new residential properties immediately adjacent to large-scale late-night uses, most of the other issues raised are likely to be capable of being overcome with careful design. There are town centre core developments through the PDR route where no such

complaints have been generated, but the decision about whether these issues should be addressed in design is left entirely up to the developer, and the result is clearly that foreseeable environmental protection and noise issues are arising too frequently in the core of the town centre.

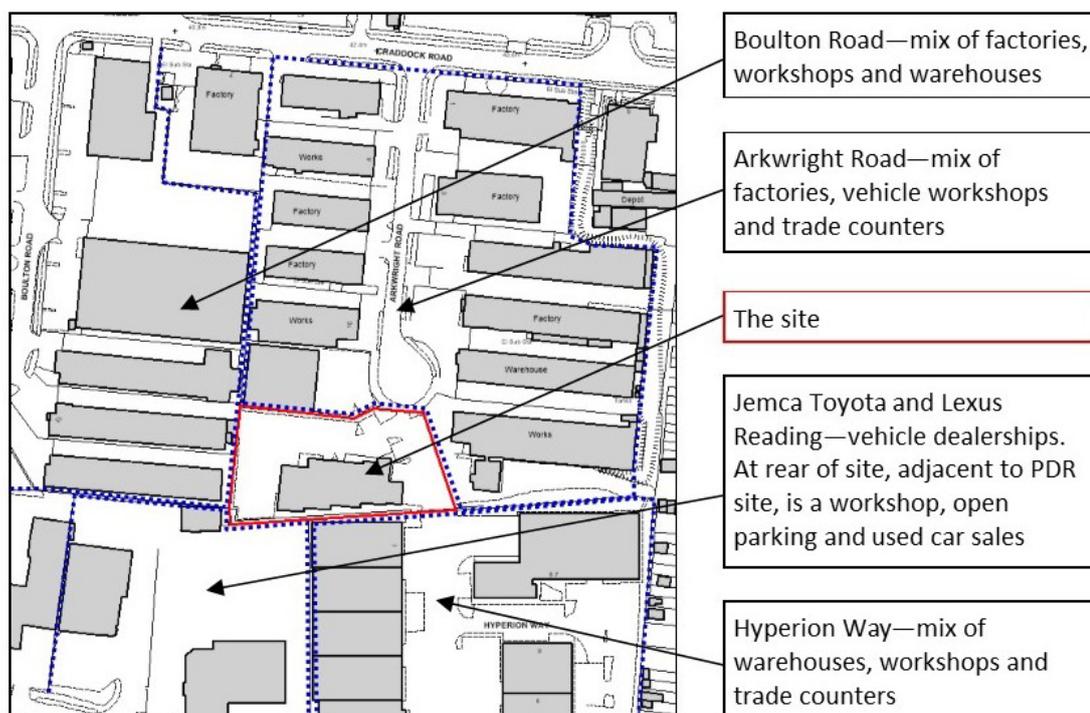
- 5.3.8 As an example, in Building 16, the building whose residents have made by far the largest amount of complaints, one complaint relates to the noise impacts on a single aspect studio apartment looking directly out over a service yard used by adjoining commercial premises. The fact that this leads to noise impacts on the occupant in the evening is an entirely predictable matter, that, had it been dealt with through the planning application route, should have been picked up at that point and designed out, whilst still delivering a residential development that helps meet housing needs. This is a clear example of why a planning permission route is required.

Committed developments in employment and commercial locations

- 5.3.9 It is worth noting in relation to [table 5.8](#) that no analysis has been carried out of PDR developments in employment areas and other primarily commercial locations because, although there are outstanding prior approvals in these locations, none have yet been completed. PDR developments spreading to these areas is a relatively recent development and one that causes considerable concern. It could be expected that precisely the same issues in terms of noise from commercial premises, artificial light, odour etc could arise in these locations.
- 5.3.10 Therefore, it makes sense to examine examples of those properties within employment or other commercial locations which have received prior approval but have not yet been implemented, and consider the degree to which noise and other environmental protection complaints would be likely to arise if the approvals were to be implemented.
- 5.3.11 As a first example, prior approval was granted in June 2018 for the change of use of 14 Arkwright Road from office to 37 dwellings (reference 180654). This has not yet been implemented. This building, currently known as The Quad, and formerly the Duran Centre, was constructed in 2000 and forms part of a defined Core Employment Area ('North of Basingstoke Road') under policy EM2 of the Reading Borough Local Plan.
- 5.3.12 Figure 5.2 shows the location of the site. It sits at the end of an entirely commercial cul-de-sac and is surrounded on all sides by commercial uses. These uses comprise the types of uses that one would expect to find in a mixed commercial location such as this - factories, trade counters, vehicle workshops and warehouses. All of these uses will generate some level of noise and disturbance to residents, potentially at unsociable hours, and this may well be an essential part of their operation. Some of these uses are in very close proximity. The rear wall of the PDR building, which contains what would become residential windows, is only 6-7 metres away from the nearest industrial unit in Hyperion Way. Due to level changes, the surface car parking and surfacing uses for Hyperion Way and the

Toyota site to the south are raised and are directly adjacent to first floor windows of the PDR building. The surrounding uses are all likely to generate substantial numbers of vehicle trips, likely including HGVs. All of this makes the site an entirely inappropriate place to live for reasons of noise and disturbance in particular, that would not be considered appropriate for residential through a normal planning application route.

Figure 5.2: Location of PDR approval at 14 Arkwright Road and surroundings

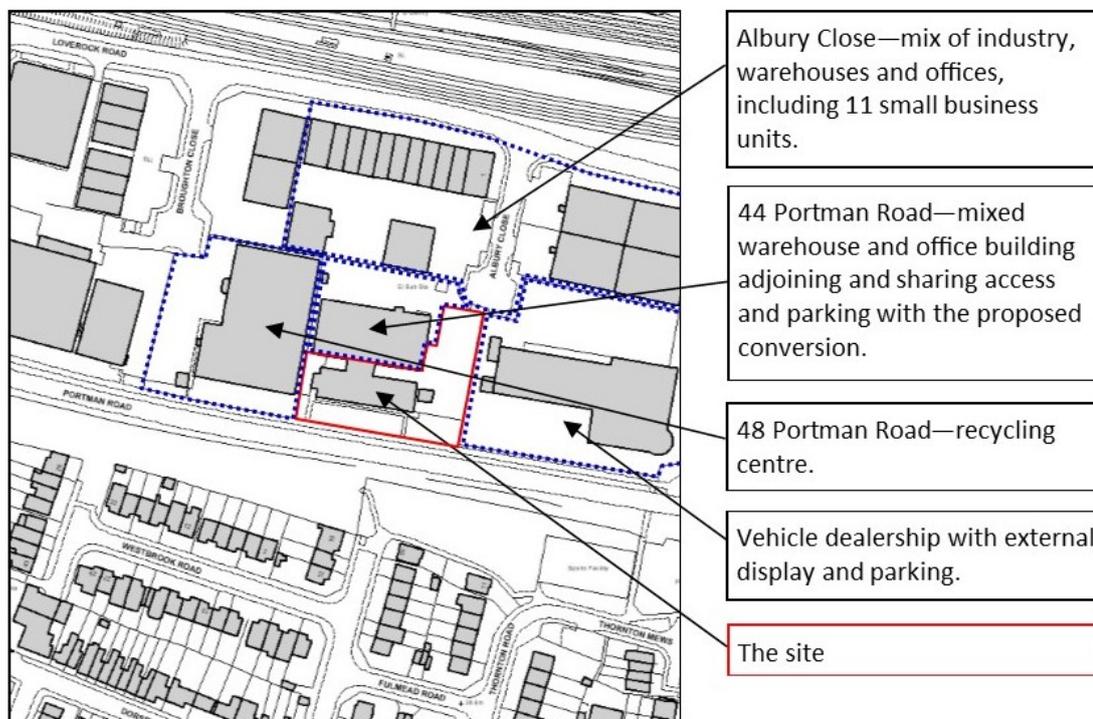


5.3.13 As a further example, prior approval was granted in August 2020 at 42 Portman Road (200693) for the conversion of a two-storey office building to 16 dwellings. The site forms part of the Portman Road Core Employment Area under policy EM2. As yet, this approval is unimplemented.

5.3.14 Figure 5.3 shows the location of the site. The building itself adjoins another two-storey building (44 Portman Road) currently in use as a mix of warehouse and offices, and the access and parking areas are shared by the two buildings. Floorplans show eight of the dwellings would be facing north, directly facing the southern wall of the 44 Portman Road building, and would be only 5 metres away from this wall, giving significant potential for noise impacts. The site to the west, 48 Portman Road, is currently in use as a recycling centre dealing with a range of materials, and the rear wall of this building would be only 6 metres away from the closest part of the residential proposal. Other surrounding uses offer no relief in terms of potential noise and disturbance, with a mix of employment uses around Albury Close, from which the site is accessed, including important small business units, and a vehicle dealership to the east. All of these businesses are likely to cause noise and disturbance to residential occupiers, including from the on-site operations as well as HGV trips. Whilst there are residential areas to the south, on

the other side of Portman Road, they are 50 metres away, and Portman Road has always formed a clear barrier between residential and employment, incorporating a green buffer along its southern side.

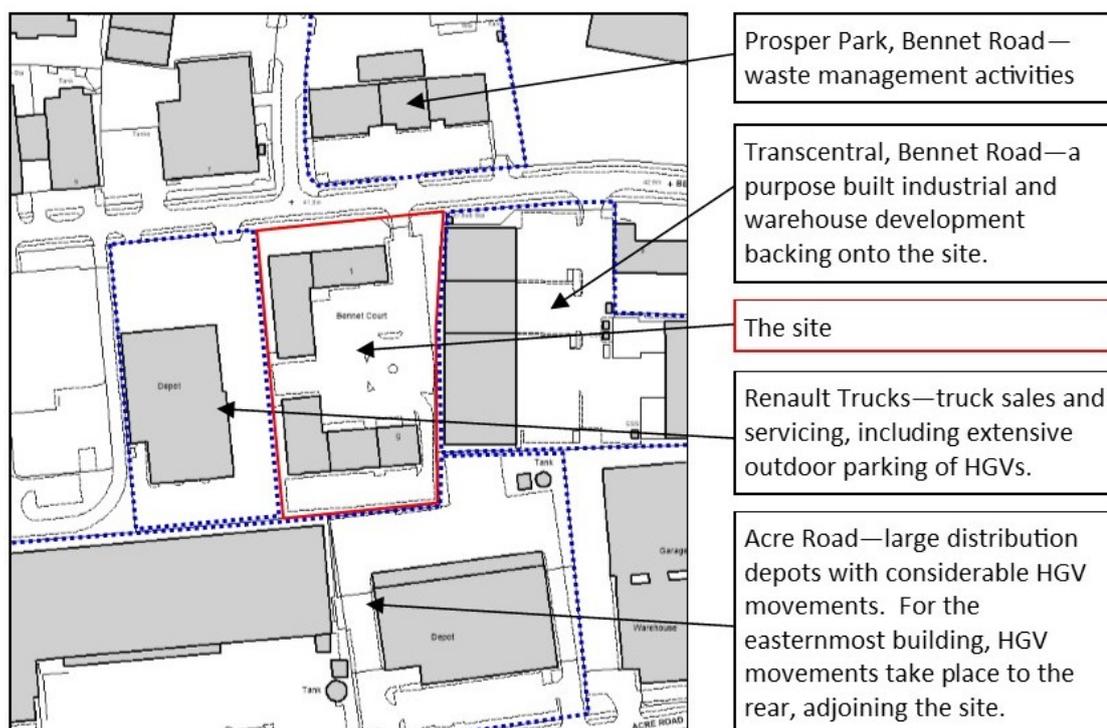
Figure 5.3: Location of PDR approval at 42 Portman Road and surroundings



5.3.15 Among the most recent prior approvals are at Bennet Court, Bennet Road, for conversion of two office buildings (blocks 1 and 2) to 27 and 22 dwellings respectively (reference 210320 and 210306). These prior approvals were issued in April 2021, and again are not yet implemented.

5.3.16 Figure 5.4 shows the location of Bennet Court, which is wholly within the Bennet Road Core Employment Area, and is surrounded on all sides by industrial, warehouse or commercial activities that will cause significant noise and disturbance. To the west is an HGV sales and service business, where the main outdoor HGV parking is directly along the eastern boundary, immediately alongside the proposed residential building and within 5 metres of its frontage. According to the floorplans, 14 of the proposed dwellings would directly face onto this frontage only. To the south is the rear of large distribution warehouses along Acre Road which see significant amounts of HGV movements. For one of these warehouses, the HGV movements are to the rear, adjacent to the site and less than 20 metres from the building itself. A further six of the dwellings would face onto this yard. To the east is Transcentral, a group of modern, purpose built industrial and warehouse units, and to the north, on the other side of Bennet Road, is a waste management facility. Again, noise and disturbance in very close proximity to the proposal will be inevitable.

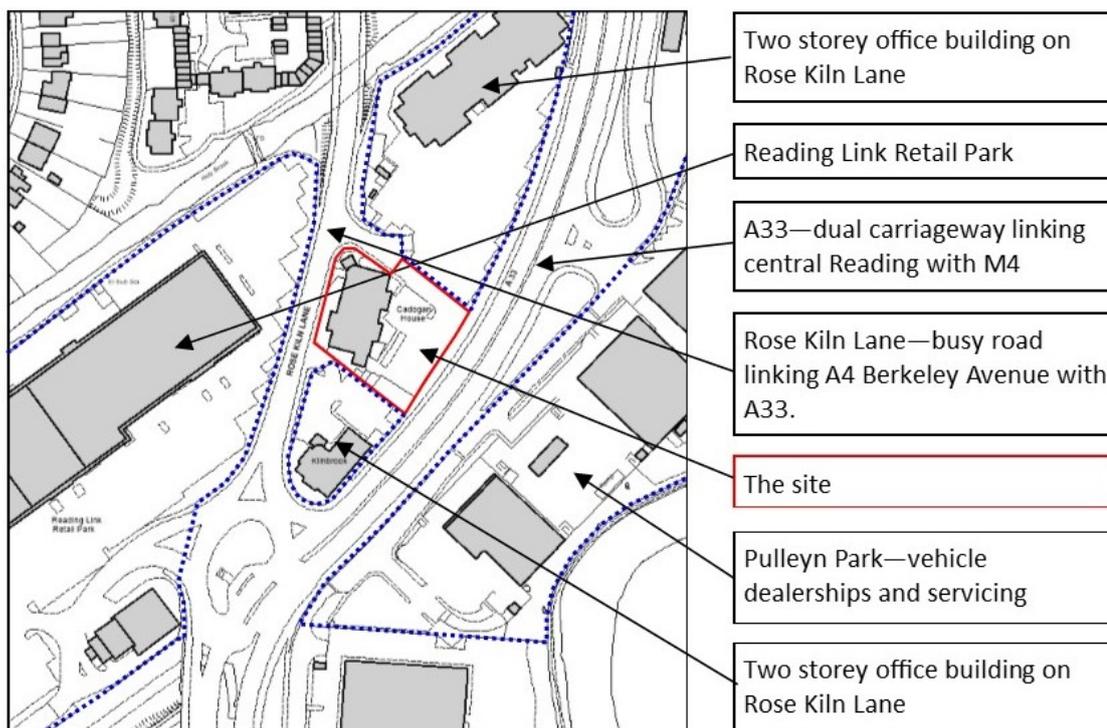
Figure 5.4: Location of PDR approval at Bennet Court and surroundings



5.3.17 As a final example, various prior approvals have been given for Cadogan House on Rose Kiln Lane, a two-storey office in a mixed commercial area. This include for conversion to 19 (ref 172277), 24 (182166) or 39 (181643) dwellings, none of which have so far been implemented.

5.3.18 Figure 5.5 shows the location of Cadogan House. Unlike for the other examples given, this site does not form protected employment land under policy EM2, and is more of a mixed commercial location, including a retail park on the western side of Rose Kiln Lane and vehicle dealerships and servicing on the eastern side. Although there may be noise issues associated with those issues, the largest issue is likely to be noise from the adjacent roads. The A33 to the east is a dual carriageway and the main link between central Reading and the M4 motorway. Rose Kiln Lane to the west is the link between the A4 passing south of central Reading and the A33. Both roads are very busy and can experience significant congestion at peak times. There is no scope within the various forms of PDR to consider road noise. Whilst it may be possible to mitigate the impacts of fronting onto one such road, being sandwiched between two is likely to result in an unacceptable living environment. In any case, without a planning application being made, there are no means by which to secure necessary mitigation.

Figure 5.5: Location of PDR approval at Cadogan House and surroundings



5.3.19 It should also be noted that the potential for reallocation for other uses, in particular for residential, was assessed for each of these sites (as part of a wider ‘plot’) in the 2018 Employment Area Analysis⁷ to support the Local Plan. As part of this, the quality of the wider environment (including noise) was assessed in terms of suitability for alternative uses. In the case of three of the four examples above (14 Arkwright Road, 42 Portman Road and Cadogan House) the assessment was that the plot containing these sites does not have potential for release due to the quality of the wider environment. In the case of Bennet Court, it was considered to have potential for release in terms of this criteria only as part of a larger plot that also included a number of adjacent sites - but it is very likely that the results would have been different had the site been considered on its own.

5.3.20 Therefore, it is considered that the examples demonstrate that location of residential PDR within both designated employment land and other more mixed commercial locations has clear potential for unacceptable noise impacts on residents, and that this goes beyond merely the noise from commercial premises specified in most of the relevant forms of PDR.

Wholly unacceptable adverse impacts

5.3.21 Use of the PDR in certain parts of Reading will result in the exposure of new residents to high levels of noise and other environmental nuisance. The lack of a planning application will mean that measures to provide mitigation, which would normally be secured by condition, will not be possible. Whilst noise from

⁷ [Reading Employment Area Analysis, March 2018](#)

commercial premises may be possible to consider within the conditions of some of the forms of PDR, noise from other sources such as outdoor events or road noise, particularly with high levels of HGV traffic, cannot. The high levels of noise to which residents would be exposed would directly impact their quality of life. The importance of securing and improving quality of life is directly stated in the Local Plan vision and objectives, and such impacts would therefore represent wholly unacceptable adverse impacts.

Relevance to types of PDR

5.3.22 The issue of noise and other environmental nuisance is relevant for any form of PDR that brings residents into areas characterised mainly by commercial premises. This includes any conversions of existing commercial businesses, or development above or in place of commercial businesses. It is less likely to apply to those forms of PDR that intensify existing residential premises, as the assumption would be that most such sites would already be in a location where noise levels are likely to be acceptable for residential purposes. This is not to say that noise will never be an issue for those forms of PDR, but it is likely to represent a considerably less significant issue.

Table 5.9: Matrix showing applicability of noise and other environmental nuisance to different forms of PDR

Permitted development right	Relevant to issue?
Part 3 Class MA - use class E to residential	✓
Part 3 Class M - takeaway, betting office, payday loan shop or launderette to residential	✓
Part 3 Class N - casino or amusement arcade to residential	✓
Part 20 Class ZA - demolition and rebuild for residential	✓
Part 20 Class A - upward extension of purpose-built flats for residential	X
Part 20 Class AA - upward extension of detached commercial or mixed use building for residential	✓
Part 20 Class AB - upward extension of terraced commercial or mixed use building for residential	✓
Part 20 Class AC - upward extension of terraced house for residential	X
Part 20 Class AD - upward extension of detached house for residential	X

Relevance to types of area

5.3.23 The assessment in this section has demonstrated that noise and environmental nuisance has arisen in particular in the town centre core for PDR developments that have taken place so far, and that it is also very likely to arise in employment areas and other commercial areas (where so far no PDR has been implemented). This will include where other commercial areas, such as retail parks, arise within the town centre fringe. Noise can also arise alongside main arterial routes, but this can be quite locally specific and unlikely to justify a direction covering all arterial

routes. Whilst this impact is clearly also possible in other locations, depending on individual sites, it is far less likely as these are locations where residential development is to be expected.

Table 5.10: Matrix showing applicability of noise and other environmental nuisance to different areas

Type of area	Relevant to issue?
Town centre core	✓
Town centre fringe	✓ (partial)
District and local centres	X
Main arterial routes	✓ (partial)
Employment areas	✓
Other commercial areas	✓
Residential areas	X

5.4. Air quality

- 5.4.1 Poor air quality can have a serious impact on human health and on the natural environment. Whilst there are legal limits, there are no ‘safe’ levels of air pollutants. It is estimated that air pollution reduces the life expectancy of every person in the UK by an average of 7-8 months⁸.
- 5.4.2 Whilst some other environmental impacts, in particular noise and contamination, are matters that can be taken into account in considering prior approval, air quality is not among the stated conditions of any of the PDR considered in this report. The only recent PDR where consideration of air quality was included was Part 3 Class P (change of use from use class B8 to residential), where condition (b)(i) stated that prior approval will be required as to “*impacts of air quality on the intended occupiers of the development*”, but this PDR is no longer in place for new approvals.
- 5.4.3 The importance of addressing air quality in planning decisions is set out in paragraph 174 of the NPPF, which states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

...

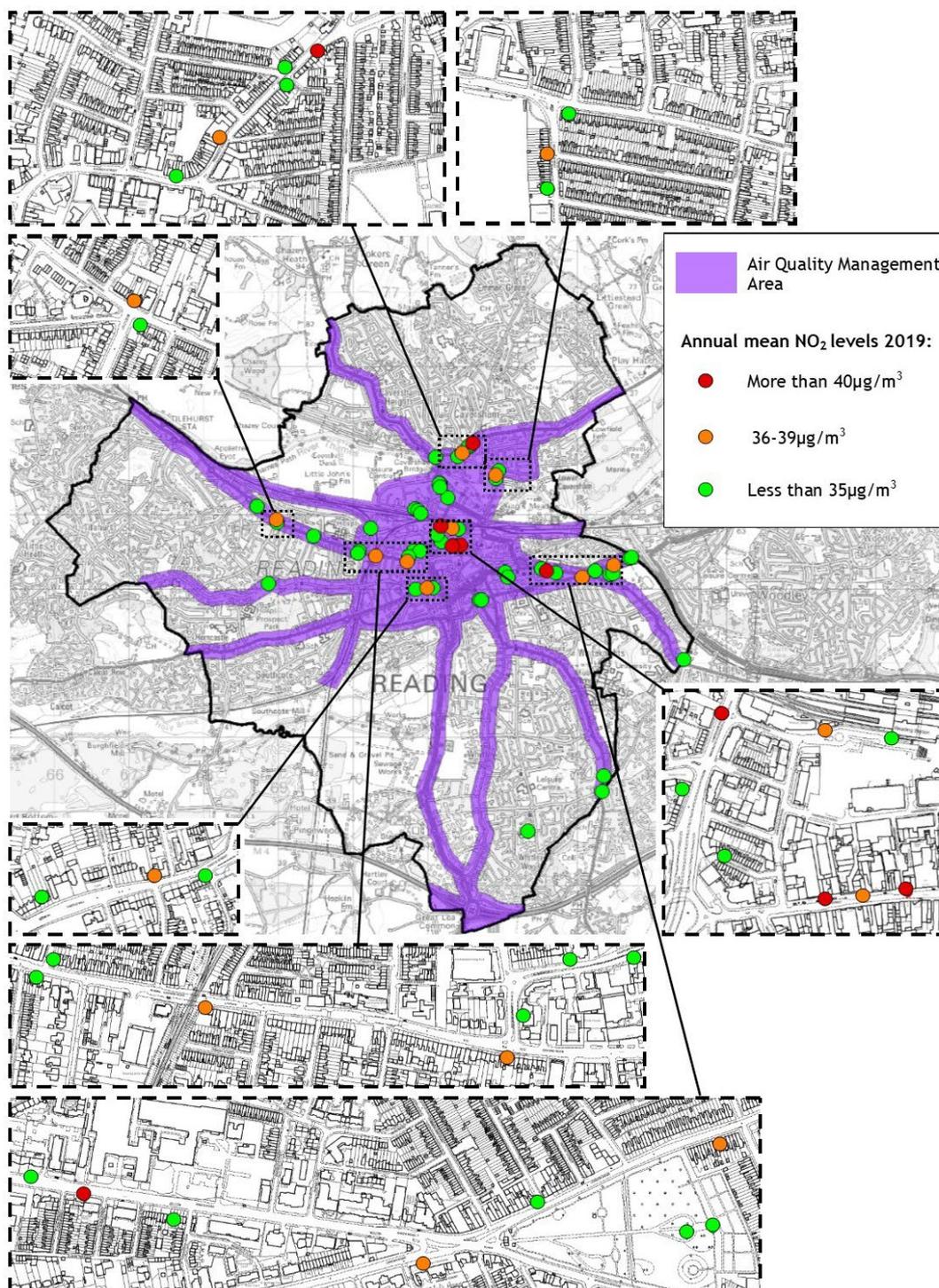
(e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. ...”

⁸ The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, volume 1, 2007

- 5.4.4 Air quality is a particular issue in Reading. The Borough is a heavily built-up area, with some transport corridors which see considerable congestion levels at peak times, and vehicle emissions cause the most significant air quality issues. Whilst PM₁₀ and PM_{2.5} levels are areas of concern due to the fact that there is no safe limit for these pollutants, it is nitrogen dioxide (NO₂) which is of greatest concern due to the fact that Reading sees exceedances of the national objectives in some locations. Reading Borough Council is one of the authorities required to carry out a targeted feasibility study with the aim of bringing forward NO₂ compliance in the shortest time possible.
- 5.4.5 An Air Quality Management Area (AQMA) exists across a large area of Reading, and is show on Figure 5.6. This area covers almost all of the central area as well as the main radial transport corridors. Much of the AQMA does not exceed national objective levels, but hotspots within the area do. It is likely that the AQMA will continue to see high levels of development, given that it includes the areas most accessible by all modes of transport, including the town centre, which is why a robust policy, EN15, has been put in place in the Reading Borough Local Plan.
- 5.4.6 Data on air quality levels is published on the Council's website in the 2020 Air Quality Status Report⁹, and helps to understand where the air quality issues are greatest, particularly for NO₂. In examining this data, it makes sense to use data from before the Covid-19 pandemic, as this significantly altered travel patterns and therefore congestion in a way which is not expected to be replicated in the future. Therefore, data from 2019 is used.
- 5.4.7 Figure 5.6 shows the annual mean NO₂ monitoring results for different locations in Reading for 2019. The national annual mean objective level is 40µg/m³, and there are a number of locations shown where the national mean was exceeded for 2019. It is also worth considering 'borderline exceedances' of 36µg/m³, to account for the inherent inaccuracy of diffusion tube data.

⁹ [2020 Air Quality Annual Status Report \(ASR\) - Reading Borough Council](#)

Figure 5.6: Map showing AQMA and annual mean NO₂ levels 2019



5.4.8 The map shows that the areas of greatest concern for NO₂ are either on main arterial routes or within the core of the town centre, and are all within the AQMA. There are particular issues around Friar Street and Caversham Road in the centre as well as parts of the A4 eastwards, A4155 northwards and A329 westwards. These hotspots are shown in more detail in the inset maps on Figure 5.6, and are broadly as follows:

- Friar Street west of the junction with Station Road;

- Caversham Road between the Weldale Street junction and the railway bridge, and Station Approach;
- Prospect Street in Caversham;
- Northern end of George Street in Caversham;
- Cemetery Junction extending westwards along Kings Road to Eldon Road junction and eastwards along London Road to St Bartholomew's Road junction;
- Castle Hill at junction with Coley Hill;
- Oxford Road between Reading West station and Russell Street; and
- Oxford Road around junction with Grovelands Road.

5.4.9 The areas where there are identified or potential poor levels of air quality are not necessarily unsuitable for residential development. Considerable amounts of residential development continue to occur within the AQMA, which covers the entire town centre and most of the most accessible locations in Reading. However, consideration through the planning application process allows for the impacts to be considered, with reference to a submitted Air Quality Assessment where necessary, and, if required, mitigated. Such mitigation can be incorporated into a development's design from the outset, such as through its layout, for instance set backs from the road, or through ensuring windows to habitable rooms are located away from facades that are in close proximity to the source of poor air quality. Planting can also help to mitigate impacts, as can certain types of paving. Mitigation measures could also include mechanical ventilation systems which enables residents to keep their windows closed and which draw air from away from the areas of poorest air quality. None of these mitigation measures can be secured without a planning application being submitted.

Wholly unacceptable adverse impacts

5.4.10 Poor air quality impacts directly on human health, and can reduce life expectancy. Paragraph 185 of the NPPF states that "*Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment*". The Council has its own Air Quality Action Plan aiming to reduce levels of, and exposure to, nitrogen dioxide and particulate matter, and there is a strong policy (EN15) in the Local Plan to achieve this. It is clearly wholly unacceptable that new residents should be placed in a location where there are known to be issues of poor air quality without any ability to secure adequate mitigation, as would be secured through a planning application.

Relevance to types of PDR

5.4.11 The issue of potential exposure to poor air quality is relevant to all permitted development rights that would result in new dwellings, because air quality is not specified as a condition of prior approval for any of these classes of PDR.

Table 5.11: Matrix showing applicability of air quality to different forms of PDR

Permitted development right	Relevant to issue?
Part 3 Class MA - use class E to residential	✓
Part 3 Class M - takeaway, betting office, payday loan shop or launderette to residential	✓
Part 20 Class ZA - demolition and rebuild for residential	✓
Part 20 Class A - upward extension of purpose-built flats for residential	✓
Part 20 Class AA - upward extension of detached commercial or mixed use building for residential	✓
Part 20 Class AB - upward extension of terraced commercial or mixed use building for residential	✓
Part 20 Class AC - upward extension of terraced house for residential	✓
Part 20 Class AD - upward extension of detached house for residential	✓

Relevance to types of area

5.4.12 As has been set out in this section, the locations where air quality is poorest, as a result of concentrations of NO₂, are some areas within the town centre core (Friar Street and Station Approach) and parts of some of the main arterial routes (Caversham Road, Oxford Road, Kings Road, London Road, Castle Hill, Prospect Street (Caversham) and George Street (Caversham)). However, as these hotspots are very specific, this issue is of greatest relevance to only certain parts of those areas.

Table 5.12: Matrix showing applicability of air quality to different areas

Type of area	Relevant to issue?
Town centre core	✓ (partial)
Town centre fringe	X
District and local centres	X
Main arterial routes	✓ (partial)
Employment areas	X
Other commercial areas	X
Residential areas	X

5.5. Loss of employment space

5.5.1 One of the Council’s concerns is that PDR erodes the amount of floorspace available to businesses, prevents the Council meeting its assessed needs for employment space and therefore impedes economic growth. This section examines the evidence around that position.

5.5.2 The Council monitors net change in floorspace in different use classes on an annual basis. Table 5.13 shows annual net change in floorspace in the B1 use class in Reading over a 20-year period, and also shows the net change that directly results from office to residential PDR. B1 floorspace is the only use class shown here, because this has been the only form of PDR which has been taken up in Reading on a significant scale.

Table 5.13: Net change in B1 overall and through PDR 2001-2021

Year	All B1 net change (sq m)	B1 net change PDR (sq m)
2001-02	76,110	N/A
2002-03	53,410	N/A
2003-04	-21,080	N/A
2004-05	-9,330	N/A
2005-06	-10,440	N/A
2006-07	-5,760	N/A
2007-08	-14,210	N/A
2008-09	-3,680	N/A
2009-10	53,810	N/A
2010-11	-44,050	N/A
2011-12	-13,960	N/A
2012-13	-11,040	N/A
2013-14	-4,918	-649
2014-15	-55,748	-6,934
2015-16	-23,137	-11,644
2016-17	-18,869	-16,519
2017-18	21,162	-5,837
2018-19	-5,939	-7,327
2019-20	4,020	-3,716
2020-21	-3,942	-2,352
Total 2001-21	-37,591	-54,978

5.5.3 This shows that, overall, there has been a net decline in B1 floorspace. The overall pattern is that in most years there is a net loss of B1 floorspace, but periodically, when there is a major new B1 development taking place, there is a relatively significant net gain. It can be seen that, from 2015 onwards, where there has been a net loss in the year, the majority of it can be accounted for by losses through PDR. PDR in total has accounted for a loss of 54,978 sq m of office floorspace since 2013.

5.5.4 The adopted Local Plan (2019) plans for a net gain in employment floorspace, in line with assessed needs. An Economic Development Needs Assessment (EDNA) for Central Berkshire¹⁰ was carried out in 2016 which identified needs of 52,775 sq m of office space and 148,800 sq m of industrial and warehouse space for Reading between 2013 and 2036. This was reflected in policy EM1, with the need for office

¹⁰ Covering Reading, Wokingham, Bracknell Forest and Windsor and Maidenhead

extended to a range of 53,000 to 112,000 sq m of office to account for committed floorspace.

- 5.5.5 Table 5.14 shows how the levels of need would be affected by the net changes that have taken place in terms of office and industrial and warehouse space since 2013.

Table 5.14: Identified need for employment floorspace accounting for completions

Status of requirement	Office (sq m)	Industrial and warehouse (sq m)
Need identified for 2013-2036 by EDNA	52,775	148,800
Net change 2013-2021	-87,371	19,444
Remaining need 2021-36	140,146	129,356

- 5.5.6 It is therefore clear that Reading is still very much in a position where it needs a considerable amount of additional employment floorspace to meet its assessed needs. The NPPF states that local plans should be positively prepared, in providing a strategy that seeks to meet the area’s objectively assessed needs (paragraph 35(a)), and are required to set out criteria or identify strategic sites to meet assessed needs for economic development over the plan period (paragraph 82(b)). This is already difficult to achieve in Reading where land is very limited, and the Housing and Economic Land Availability Assessment (HELAA, November 2017) could only identify sufficient sites to meet 112,302 sq m of office and 112,268 sq m of industrial and warehouse space, which means that additional space would need to be found through intensification of existing employment areas or other windfall developments. Continued uncontrolled loss of employment floorspace through PDR will make it considerably less likely that these targets will be achieved, and this will impact on economic growth.
- 5.5.7 It is recognised that the EDNA and the Local Plan predated the Covid-19 pandemic, and there may be considerable changes to working practices that might affect office requirements in particular. These changes are yet to be understood in full. However, it is worth bearing in mind that, whilst much of the industrial and warehouse space which represents the greatest need and the most difficult to fulfil will be within the B2 and B8 use classes that will not be affected by PDR, some of the industrial floorspace will also likely be within the light industrial category, now within use class E, to which class MA changes of use and class ZA demolition and rebuild will apply. The EDNA did not seek to divide this by use class, so it is not clear how much would have fallen within this category, but it could potentially be a significant proportion. The need for space for industrial activities is less likely to have been reduced by the pandemic.
- 5.5.8 It is worth dealing with one of the points often raised in favour of PDR conversions at this point, which is that it mainly leads to the loss of vacant floorspace. This has not been the case in Reading. An office building that had been at least partly occupied for at least six months within the previous three years would be exempt from the need to pay the Community Infrastructure Levy under the CIL Regulations. However, after assessment against CIL liability, of the 105 office to residential PDR

schemes for which prior approval was granted between 1st April 2015 (the introduction date of CIL in Reading) and 31st March 2021, every single scheme was found to fulfil this criterion and not a single scheme was therefore required to pay CIL. That means that every single office building was at least partly occupied in the three years before the prior approval was granted. These PDR are therefore clearly affecting occupied premises with a potential continued economic future. The three month vacancy requirement in class MA PDR, or the six month requirement in class ZA, will do little to alleviate these concerns as it is a very limited period that will not prevent existing occupiers being forced out to facilitate a residential proposal.

- 5.5.9 The reason that this affects occupied floorspace is that residential values in Reading can often be greater than office values. Table 5.15 shows some recent achieved sales values from recent residential developments in and around central Reading, including some which have resulted from office to residential conversions.

Table 5.15: Selection of achieved residential values in and around Central Reading¹¹

Development name and type	Value per sq ft (1-bedroom)	Value per sq ft (2-bedroom)
Verto, Kings Road (new build)	£499 - £584	£448 - £630
Reading Riverside, Berkeley Avenue (new build)	£413 - £581	£436 - £540
Kings Reach, Kings Road (office conversion under PDR)	£398 - £617	£463 - £518
6-14 Weldale Street (new build)	£502 - £661	£420 - £487
300 Kings Road (office conversion under PDR)	£575 - £659	£592

- 5.5.10 It is worth noting that this does not factor in the costs of conversion of residential to office. However, it is also worth noting that, for PDR schemes, there are benefits to be set against these costs including quick delivery of residential units and the lack of affordable housing contributions.
- 5.5.11 Table 5.16 shows a selection of achieved capital values from recent sales of office buildings in and around central Reading, which can be used as a comparison. It can be seen that there is a considerable range of values, depending on whether or not the office is Grade A or B and also depending on whether the building is sold with occupiers. It is clear that, as it stands, for the more modern Grade A floorspace in close proximity to Reading station, such as Thames Tower, residential values are unlikely to be higher than office values. However, for older Grade B stock, and even potentially for some Grade A stock, residential values can be considerably higher even where a building has a tenant (which was the case at 121 Kings Road and Caversham Bridge House for example), which is why the PDR has been taken up to such an extent in Reading.

¹¹ Sourced from Savills report submitted for planning application 200188 at 55 Vastern Road

Table 5.16: Selection of achieved office capital values in and around Central Reading

Building name	Date of sale	Achieved capital value per sq ft
2 New Century Place, East Street (subsequently converted to residential under PDR)	September 2016	£236
Premier House, 60 Caversham Road	May 2018	£298
Abbey Gate, Kings Road	June 2018	£312
The Pinnacle, Tudor Road	July 2017	£322
Caversham Bridge House, Waterman Place	December 2018	£382
121 Kings Road	December 2018	£414
The White Building, 33 Kings Road	June 2018	£535
Forbury Works, Forbury Road	August 2017	£568
Thames Tower, Station Road	August 2018	£664

5.5.12 This has been reflected in the availability of Grade B stock in particular since the office to residential PDR was introduced. Data from CoStar showed that availability of office space with a star rating of 1-3 on CoStar’s rating system, equating broadly to Grade B space or lower¹², was at 16,317 sq m in Reading town centre and 9,525 sq m elsewhere in the Borough for September 2021. These are extremely low figures, and make it difficult for potential occupants to find stock, particularly at affordable rents, with around 70% of the limited amount of available stock being marketed at rents exceeding £20 per sq ft. Grade B space is of particular importance for small and growing businesses in need of cheaper floorspace, and these businesses make a substantial contribution towards economic growth.

5.5.13 Loss of employment within town centres can also impact on the sustainability of other businesses within the town centre. The recent experience of the Covid-19 pandemic has provided a demonstration of what can happen to town centre businesses when office occupancy drops dramatically. At the time of writing, offices are still only back to approximately 30% office occupancy and the loss of income is pushing businesses (particularly small independents such as sandwich shops and pubs) that cannot rely simply on weekend spend out of business. There are also much more direct impacts on high streets, explored in section 5.7.

5.5.14 Therefore, there is clearly a situation where significant quantities of employment floorspace have already been lost to PDR, and there is potential for this to continue to occur, including through the demolition and rebuild of existing light industrial buildings where PDR have previously been limited.

Wholly unacceptable adverse impacts

5.5.15 Development that would have an adverse impact on economic growth is clearly wholly unacceptable. The NPPF is built around achieving sustainable development, the entire purpose of the planning system. Of the three overarching objectives of sustainable development, the economic objective is to: “*help build a strong,*

¹² [CoStar’s building rating system](#)

responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity” (paragraph 8).

5.5.16 The Local Plan equally attributes importance to achieving economic growth, including the vision stating that *“Reading will continue to thrive as an internationally recognised economic centre, and the core of a wider, vibrant urban area and surrounding hinterland within other authorities, that makes a vital contribution to the UK economy”*. In producing the Local Plan, the Council has assessed the needs for employment space, and sought to provide the space to meet these needs to ensure economic growth, which is put at wholly unacceptable risk by PDR which would reduce this space, and potentially result in businesses, including small or growing businesses, closing or potentially leaving Reading.

Relevance to types of PDR

5.5.17 The loss of employment space is only relevant to those forms of PDR which would actually result in a loss of existing employment. This therefore excludes the upward extension of existing floorspace, where the floorspace would be retained, and would exclude changes of use from non-employment uses such as betting offices or casinos. It would apply to changes of use from use class E (which includes office, research and development and light industrial) and to demolition and rebuild of those same uses to residential.

Table 5.17: Matrix showing applicability of loss of employment space to different forms of PDR

Permitted development right	Relevant to issue?
Part 3 Class MA - use class E to residential	✓
Part 3 Class M - takeaway, betting office, payday loan shop or launderette to residential	X
Part 3 Class M - casino or amusement arcade to residential	X
Part 20 Class ZA - demolition and rebuild for residential	✓
Part 20 Class A - upward extension of purpose-built flats for residential	X
Part 20 Class AA - upward extension of detached commercial or mixed use building for residential	X
Part 20 Class AB - upward extension of terraced commercial or mixed use building for residential	X
Part 20 Class AC - upward extension of terraced house for residential	X
Part 20 Class AD - upward extension of detached house for residential	X

Relevance to types of area

5.5.18 Whilst existing employment uses can be found in a range of locations, in reality the vast majority of such uses are either within the town centre or existing employment areas. The uses found in the town centre include both the core of the

centre (where many of the newest Grade A office buildings can be found, in particular in close proximity to the station) and the town centre fringe. The latter includes secondary office locations such as along Kings Road, Queens Road and Caversham Road where much of the Grade B stock is located, but also includes some areas of high-quality Grade A space in particular around Forbury Road and Forbury Square. Older employment areas tend to include a mix of employment uses, including a substantial amount of light industrial as well as office uses that tend to be substantially cheaper and often geared towards small businesses.

- 5.5.19 Employment space can be found in other locations, such as other primarily commercial locations, district and local centres and main arterial routes. However, other than a criteria-based policy approach, the Local Plan does not offer specific policy protection to these premises, and it would therefore not be consistent with the Local Plan approach to justify an Article 4 direction in those locations on the basis of loss of employment.

Table 5.18: Matrix showing applicability of loss of employment space to different areas

Type of area	Relevant to issue?
Town centre core	✓
Town centre fringe	✓
District and local centres	X
Main arterial routes	X
Employment areas	✓
Other commercial areas	X
Residential areas	X

5.6. Impacts on existing businesses

- 5.6.1 Impacts on businesses and economic growth are not necessarily limited to those who would occupy the premises that are to be converted to residential use. The impacts are also likely to be felt by businesses on surrounding sites that would suddenly find residents adjoining their existing premises. In locations such as employment areas, other significant commercial areas or in parts of the core of the town centre, this is unlikely to have been anticipated when the businesses began operating, and as such many businesses will likely be causing a considerable amount of noise and disturbance, often at unsociable hours, as a central part of their business. The introduction of residents could result in noise and environmental nuisance complaints - as has been seen in section 5.3 - or could result in objections and planning concerns if those occupiers make planning or licensing applications to expand or intensify their operations.
- 5.6.2 This issue is explored from the perspective of the potential residents in section 5.3. This takes a number of examples and demonstrates the type of operations which

surround some of the locations which have received prior approval for residential use. These operations include:

- Industrial uses;
- Storage and distribution uses;
- Waste and recycling facilities; and
- Vehicle dealerships and servicing, including for HGVs.

Such uses are likely to need to continue to expand and adapt for new occupiers or for the changing needs of existing businesses. In addition, section 5.3 has also demonstrated the issues that can be caused as a result of location of residential adjacent to town centre businesses, which might include drinking establishments and nightclubs, or adjacent to locations used for outdoor events.

5.6.3 In table 5.19, a selection of prior approvals that have been granted so far (and, in some cases, completed) have been listed to understand the types and number of businesses that can often surround these proposals in different areas. These are not necessarily those with the most significant impacts on existing businesses, but merely a selection of those which are in established business locations. Nor are these all necessarily in locations which would be unsuitable for residential (although that is certainly the case for some), but it is a matter which in some cases would have required mitigation secured through a planning application process.

Table 5.19: Selected existing prior approvals with information on surrounding businesses

Site	Prior approval reference	Type of location	Number and types of commercial premises within 50 metres of building
59-60 St Mary's Butts	131055	Town centre core	Over 30 - Shops; restaurants; pubs (with beer garden); bar; service yards
45 West Street	131762	Town centre core	15 - Shops; restaurants; takeaways; nursery; amusement arcade.
Sussex House, Market Place	140892	Town centre core	16 - Shops; pub; offices; space for events
37-42 Market Place	141280	Town centre core	Over 30 - Shops; pubs; restaurants; space for events
7-11 Station Road	141529	Town centre core	Over 30 - Shops; pubs; clubs; hotels; takeaways
159 Friar Street	151392	Town centre core	Over 40 - Shops; pubs; bars; nightclub; restaurants; offices
Cadogan House, Rose Kiln Lane	172277, 181643, 182166,	Other commercial area	3 - offices; retail warehouse

Site	Prior approval reference	Type of location	Number and types of commercial premises within 50 metres of building
14 Arkwright Road	180654	Employment area	12 - Industrial; warehouses; trade counters; vehicle dealerships
42 Portman Road	200693	Employment area	5 - Warehouses; offices; recycling centre; vehicle dealership
Bennet Court	210306, 201320	Employment area	8 - Industrial; warehouses; HGV sales and servicing; waste management

- 5.6.4 It can be seen that in the town centre core, there tend to be much larger numbers of existing businesses. Whilst some may well be compatible with residential, many others, such as pubs and clubs, space for outdoor events and service yards, have the potential to cause issues. Even in the case of shops there may be issues where there are small service yards containing bin stores that are accessed at unsociable hours. In the case of employment areas and other commercial areas, there tend to be a smaller number of businesses as the sites are much larger, but the presence of large industrial and warehouse premises as well as waste uses and HGV servicing mean that conflict between residential and commercial uses is highly likely.
- 5.6.5 Some of the forms of PDR (Part 3 class N and Part 20 classes ZA, AA and AB) are subject to prior approval of the impact of development on existing businesses in the area. Part 3 class MA, change of use from commercial to residential, does not include consideration of these impacts, and this is likely to be by far the most frequently used form of PDR. Consideration of this matter is also not possible under Part 3 class M. However, even for those forms of PDR where consideration on existing businesses is possible, it is still not clear that this could include the opportunities for those existing businesses to expand on their sites, which is something that businesses might reasonably expect to be able to do in locations where residential is not otherwise present.
- 5.6.6 It is worth being aware that the Local Plan relies on the potential for intensification of Core Employment Areas to meet its objectively assessed needs for employment development. The Housing and Economic Land Availability Assessment (HELAA, November 2017) identified sufficient specific sites to meet 112,268 sq m of the 148,440 sq m of identified need for industrial and warehouse space, leaving a shortfall of 36,172 sq m. The Employment Area Analysis then assessed the capacity within the Core Employment Areas to accommodate this shortfall and found scope to provide between 27,000-51,000 sq m additional floorspace. Without this scope for intensification, the objectively assessed needs for employment space would be unlikely to be met, impacting on economic growth.

Wholly unacceptable adverse impacts

5.6.7 As has been seen in this section, the introduction of a limited number of residential properties could have a direct impact on the operation of a potentially large number of surrounding businesses. The variety of existing businesses in Reading is an essential part of its continued economic success. If businesses are forced to move away from their current site, there is no guarantee that they can be accommodated elsewhere within or close to the town. As set out in the Local Plan (see in particular policies EM1 and RL1) there is not sufficient existing space to accommodate needs, in particular for industrial and warehousing space, so there is little likelihood that businesses could find alternative premises - and if they did, further PDR development could in any case continue in the new location. This could result in the loss of key activities that support the local economy, either through moving away from Reading or closure. This would therefore represent wholly unacceptable adverse impacts.

Relevance to types of PDR

5.6.8 The harm in terms of impact on existing businesses is relevant to any form of PDR that is likely to result in residential development in areas characterised mainly by commercial premises. This means developments that would result in the change of use of existing commercial floorspace, or developments that would replace or be located above existing commercial operations. The impact is of greatest relevance for part 3 classes M and MA where this matter cannot be considered through prior approval, but is also relevant to those where impact on existing businesses is listed as a matter that can be considered, but where the opportunities for those businesses to expand or intensify in the future may still be limited. It is not relevant to the forms of PDR that would extend existing residential uses, as it would be assumed that existing residential is located where it is much less likely to impact on existing businesses.

Table 5.20: Matrix showing applicability of impacts on existing businesses to different forms of PDR

Permitted development right	Relevant to issue?
Part 3 Class MA - use class E to residential	✓
Part 3 Class M - takeaway, betting office, payday loan shop or launderette to residential	✓
Part 20 Class ZA - demolition and rebuild for residential	✓
Part 20 Class A - upward extension of purpose-built flats for residential	X
Part 20 Class AA - upward extension of detached commercial or mixed use building for residential	✓
Part 20 Class AB - upward extension of terraced commercial or mixed use building for residential	✓
Part 20 Class AC - upward extension of terraced house for residential	X

Permitted development right	Relevant to issue?
Part 20 Class AD - upward extension of detached house for residential	X

Relevance to types of area

- 5.6.9 The impacts on existing businesses are much more likely to occur where there are businesses that cause noise and disturbance and where existing residential development is currently limited. This is most likely to be the case in employment and other commercial areas, where businesses currently operate unconstrained by neighbouring residential (including where those other commercial areas, such as retail parks, are located in the town centre fringe), and in the town centre core, in particular those locations characterised by pubs and clubs or outdoor events.

Table 5.21: Matrix showing applicability of impacts on existing businesses to different areas

Type of area	Relevant to issue?
Town centre core	✓
Town centre fringe	✓ (partial)
District and local centres	X
Main arterial routes	X
Employment areas	✓
Other commercial areas	✓
Residential areas	X

5.7 Impacts on the high street

- 5.7.1 Reading's defined centres, and the high streets within them, are essential to providing services and facilities to its residents. A centre containing a range of functions including shops, leisure, community uses and other services in close proximity to where local residents live reduces the need to travel by ensuring that one visit, often by foot or public transport, can fulfil a number of purposes, and ensures that facilities are available to those who have no access to a private vehicle. Such centres form the centrepiece of their communities.
- 5.7.2 The Council has, as required by national policy, identified a network and hierarchy of centres in the Local Plan to ensure that these centres continue to thrive and form the focus for new planned development for retail, leisure and related uses. Central Reading is identified as a regional centre, serving not only the Borough and the wider urban area of Reading but also a significant catchment covering a large number of surrounding towns and countryside, particularly for comparison goods needs and also leisure trips. Below this level are 18 identified district and local centres that focus on more day-to-day needs.

- 5.7.3 The forms of PDR that would result in the loss of shops and services within centres threaten the health and, potentially, continued existence of these centres. These centres are only as strong as the facilities contained within them. In the case of smaller centres, where it is often the diversity of facilities rather than a critical mass of floorspace which underpins the health of the centre, loss of a single facility could have significant implications.
- 5.7.4 In terms of impact on the high street, it is worth drawing a distinction between forms of PDR that result in changes of use or additional storeys at above ground floor level, and changes of use at ground floor level. Changes of use of ground floor commercial uses, in particular retail and leisure and related uses, can represent a serious threat to the health of our high streets, as it is these uses that attract visitors into the centre. Changes of use of upper storeys, whilst they may well result in other forms of harm discussed in this report (for instance loss of employment space or noise or air quality issues) are less likely to directly threaten the health of high streets (albeit that the loss of footfall associated with loss of offices will impact the viability of high street businesses, as referenced in section 5.5), other than where a large town centre shop unit is on multiple levels, as is the case with a number of department stores.
- 5.7.5 There exists relatively little evidence so far of significant loss of ground floor retail uses to residential in Reading through PDR, but this is because the previous forms of PDR contained safeguards that reduced the impacts. A size limit of 150 sq m was applied, for instance, which has now increased tenfold to 1,500 sq m. In addition, the prior approval process allowed consideration of the adequate provision of services and the sustainability of the shopping area, which is no longer the case other than for the adequate provision of launderettes, health centres and nurseries.
- 5.7.6 However, in terms of the potential for loss of ground floor uses within high streets to residential, this is, as of 2021, almost unlimited. Table 5.22 looks at the number units within a relevant commercial use (i.e. use class E or the types of sui generis use covered by Part 3, classes M or N of the GPDO) in each centre, and considers how many of them could be subject to some form of control, either through exemptions from the PDR or through the provision of those services being a matter that can be considered in prior approval. It shows that around 86% of all ground floor commercial units in all defined centres in Reading could be converted without planning permission or without the impact of the loss being considered through prior approval, and that in nine of the smaller centres every unit could potentially be converted.

Table 5.22: Proportion of ground floor commercial units within defined centres to which controls under PDR would potentially apply

Centre	Number of E class units (estimated)	Number of units potentially subject to controls under class MA, M or N ¹³	Percentage potentially subject to controls
Reading centre	758	160	21%
Basingstoke Road North	16	0	0%
Caversham	120	10	8%
Cemetery Junction	46	0	0%
Christchurch Road	14	0	0%
Coronation Square	12	1	8%
Dee Park	3	0	0%
Emmer Green	10	0	0%
Erleigh Road	15	2	13%
Meadway	26	2	7%
Northumberland Avenue North	8	0	0%
Oxford Road West	155	9	8%
Shinfield Road	29	0	0%
Tilehurst Triangle	69	1	1%
Wensley Road	4	0	0%
Whitley	30	6	20%
Whitley Street	38	3	7%
Whitley Wood	5	0	0%
Wokingham Road	50	1	2%
TOTAL	1,417	198	14%

5.7.7 Therefore, the potential for loss of the uses that form the basis for the health of the centre is immense. The vacancy clause within the Part 3, class MA PDR is likely to be of little protection, as three months is a very short period of time and unlikely to be much of a disincentive for an owner to allow an occupied premises to become vacant with a view to a future conversion.

5.7.8 The impact on existing centres of the loss of shops and services is not merely in terms of the visitors that those facilities bring (which the following section seeks to quantify), but also in terms of the dilution of continuous frontages of shops and services. Centres rely on a large number and range of facilities being present within a compact geographical area, and allowing residential uses to intrude on these continuous frontages can have a domino effect that can undermine the vitality and viability of the entire centre.

Quantifying the impact of loss of ground floor retail to residential

5.7.9 The argument in favour of conversion of ground floor units within centres to residential is that it brings additional footfall into centres. Whilst this is the case where the unit would otherwise be vacant, a unit vacant for three months will by

¹³ Due to the size of the unit exceeding 1,500 sq m, being within a listed building or scheduled monument, or due to the ability to consider the provision of adequate services for launderettes, health centres or nurseries

no means necessarily be a long term vacancy. It is possible to use information that is already available to broadly estimate the loss to the economy of a centre from the conversion of a shop that would otherwise be occupied compared to the gain of a residential use. The most recent retail assessment published for Reading, the Western Berkshire Retail and Commercial Leisure Assessment 2017 contains information specific to Reading which can be used for these calculations.

5.7.10 The first stage is to estimate how many dwellings would be provided from the loss of a certain amount of floorspace through PDR. Up to 31st March 2021, there was a loss of 56,500 sq m of commercial floorspace (mainly offices) to facilitate a gain of 1,116 dwellings through PDR. This means that on average one dwelling results in the loss of 50.6 sq m of commercial floorspace. Whilst the dwellings themselves are generally significantly smaller than this, this also includes internal corridors, staircases and other communal spaces. Therefore, a shop unit of 500 sq m could be expected to convert into around 10 dwellings.

5.7.11 In terms of the gains as a result of new residential in a centre, whilst there is no information on footfall, there are estimations of the expenditure available per capita in different areas. For the purposes of the 2017 study, the Reading urban area was divided into two zones. Zone 1 covered the eastern part of the Reading urban area, with Zone 2 covering the western part. Expenditure forecasts per capita for 2021 were provided for both convenience goods and comparison goods, minus special forms of trading (usually internet sales). The estimates are set out in Table 5.23.

Table 5.23: Expenditure forecasts per capita for 2021 on comparison and convenience goods (source: Western Berkshire Retail and Leisure Study 2017)

Type of retail	Zone 1	Zone 2	Average for Reading
Convenience goods ¹⁴	£2,051	£1,917	£1,984
Comparison goods ¹⁵	£3,753	£3,494	£3,624

5.7.12 Therefore, if it is assumed that there are two people in each dwelling (which is likely to be a significant overestimation given that PDR developments are dominated by one-bed and studio flats), this would mean that each new dwelling would result in £3,968 of convenience goods spend and £7,248 of comparison goods spend. Therefore, each new dwelling resulting from a PDR development could bring around **£11,216** of retail spend per annum into a centre. This is a maximum, as it is highly unlikely that all convenience and comparison spend from a resident would be retained within a single centre.

5.7.13 In terms of estimating the amount of spend lost to a centre through PDR, the 2017 study includes a variety of calculations for sales density. For 2021, it estimates the spend per square metre (net) of comparison goods retail of Reading town centre at £9,762¹⁶. It also estimates that for 2021 the spend per square metre (net) of

¹⁴ See Table 2 of Appendix II of the Western Berkshire Retail and Leisure Study 2017

¹⁵ See Table 2 of Appendix I of the Western Berkshire Retail and Leisure Study 2017

¹⁶ See Table 8a of Appendix I of the Western Berkshire Retail and Leisure Study 2017

convenience goods retail in Reading Borough is £11,325¹⁷. However, in the case of the latter, the range is extremely wide, and is skewed heavily by the large superstores. The company average sales density quoted for Lidl, for instance, is £3,487 per sq m (net)¹⁸, and this is likely to be much more in line with the trading performance of the type of convenience store likely to change use through PDR (bearing in mind the 1,500 sq m limit that applies). Therefore, an estimated spend of £3,500 per sq m (net) is assumed.

5.7.14 The 2017 Study uses a net to gross ratio of 80%¹⁹. This means that, of the average 50.6 sq m floorspace per dwelling to be lost through PDR, 40.5 sq m would be used for retail sales. Therefore, for each dwelling provided through PDR at the ground floor, it can be estimated that the following retail sales are lost to a centre:

- Convenience - **£141,750**
- Comparison - **£395,361**.

5.7.15 It can therefore be estimated that, in Reading, for every dwelling provided in a centre that results in a loss of retail floorspace, only around 8% (for a convenience goods store) or 3% (for a comparison goods store) is recouped through increased spending in the centre from that dwelling. The effect on smaller centres in particular could be catastrophic for their survival when multiplied across even a relatively small number of PDR schemes. A single theoretical development up to the limit of 1,500 sq m could result in the loss to a centre's turnover of £14.19m (comparison goods) or £5.25m (convenience goods) and would only bring around £0.34m of retail spend into the centre as a result of the new dwellings, meaning a net loss to the centre of £13.85m or £4.91m respectively. This is clearly unacceptable.

Reintroducing residential to the high street

5.7.16 One of the arguments advanced in favour of the new PDR, in particular the PDR to change use class E to residential, is that it can bring people back to live in town centres and therefore contribute to securing their future. The Written Ministerial Statement of 1st July 2021 places great emphasis on the importance of residential within high streets, and clearly sees this as one of the key roles of this PDR:

“Councils should recognise the value to housing supply and increasing resident town centre footfall from supporting ‘flats above shops’”

5.7.17 Reading Borough Council recognises the crucial role that residential can play in town centres in terms of bringing activity after usual trading hours, creating surveillance of streets and bringing additional footfall that supports businesses. These are aims that are entirely in line with policy RL3 of the Reading Borough Local Plan, which states that residential uses of upper floors in smaller centres will

¹⁷ See Table 8a of Appendix II of the Western Berkshire Retail and Leisure Study 2017

¹⁸ See Table 6 of Appendix II of the Western Berkshire Retail and Leisure Study 2017

¹⁹ See paragraph 8.14 of the Western Berkshire Retail and Leisure Study 2017

be acceptable, whilst the spatial strategy for central Reading states that residential within the centre will continue to be promoted.

5.7.18 Since its introduction in 2013, PDR has made up a significant proportion of the residential development that has taken place in high streets. For these purposes, we define ‘high streets’ as being the defined Primary Shopping Area²⁰ of central Reading (the main location for retail within the town centre) and the defined district and local centres²¹, which are too small to have any differentiation between high streets and other parts of the centre. Table 5.24 shows the proportion of new homes delivered since 1st April 2013 that result from PDR development within these high streets. It shows that, overall, 43.8% of new homes within centres over this period have come from the PDR route.

Table 5.24: Homes delivered in high streets through PDR as a proportion of all homes delivered 2013-2021

Location	Net homes completed total	Net homes completed by PDR	% of homes that are delivered by PDR
Primary Shopping Area of central Reading	504	233	46.2
District and local centres	176	65	36.9
High streets total	680	298	43.8

5.7.19 Therefore, on the face of it, the introduction of PDR could be argued to have significantly boosted residential development within high streets. However, as has been seen in section 4 when considering whether or not PDR has boosted overall housing supply, it is not as straightforward as that. Table 5.25 examines whether or not housing completions within centres have actually changed significantly overall after the PDR introduction in 2013.

Table 5.25: Total housing delivery in high streets in Reading 2003-2021 showing averages before and after introduction of office to residential PDR

Year	Completed dwellings in Primary Shopping Area of central Reading	Completed dwellings in district and local centres	Completed dwellings in high streets total
2003-04	46	12	58
2004-05	19	14	33
2005-06	72	11	83
2006-07	119	7	126
2007-08	99	5	104
2008-09	138	76	214
2009-10	94	24	118
2010-11	2	10	12
2011-12	0	8	8
2012-13	2	52	54
Annual average 2003-2013	59	22	81

²⁰ Defined in policy CR1 of the Local Plan

²¹ Listed in policy RL1 of the Local Plan

Year	Completed dwellings in Primary Shopping Area of central Reading	Completed dwellings in district and local centres	Completed dwellings in high streets total
2013-14	10	14	24
2014-15	30	22	52
2015-16	245	58	303
2016-17	86	22	108
2017-18	105	21	126
2018-19	0	4	4
2019-20	28	22	50
2020-21	0	13	13
Annual average 2013-2021	63	22	85

5.7.20 It can clearly be seen from table 5.25 that bringing residents back into high streets had been happening in Reading long before the introduction of PDR. On average, over the ten-year period between 2003 and 2013, 81 new homes per year were provided in high street locations. Many more were provided within the wider definition of central Reading. This clearly demonstrates that the normal planning application route is capable of delivering substantial growth in high streets, and has been doing so in Reading for some time.

5.7.21 Table 5.25 also does not necessarily support the notion that PDR has substantially boosted residential in high streets. The average annual completion for the ten years prior to 2013 in district and local centres is identical to the eight years since 2013 (22 per year in both cases). A similar story appears for the Primary Shopping Area, where the average only slightly increases from 59 to 63 per year. There is no evidence of any significant boost as a result of PDR. As explained in section 4, it may well have been that many of these developments would have come forward in any case through the planning application process.

Summary

5.7.22 In summary, Reading's existing centres are of great significance in providing services and facilities close to where people live and where they reduce the need to travel, resulting in a hub for their local communities. Conversion of ground floor uses to residential could potentially affect the vast majority of commercial units within centres, and result in the health of those centres being undermined. The loss of a ground floor retail use is in no way outweighed by the additional footfall as a result of new residential, and in any case the need to apply for planning permission has not previously served to prevent residential uses being brought into centres, without the need for loss of existing facilities.

Wholly unacceptable adverse impacts

5.7.23 Development that undermines the health of any of the defined centres in Reading would be a wholly unacceptable adverse impact. The importance of these centres is underlined by their definition in the Local Plan, in accordance with national

policy. The NPPF states that *“Planning policies and decisions should support the role that town centres play at the heart of local communities”* (paragraph 86), and it is clear that unconstrained use of PDR at ground floor level would undermine this. These centres are vital, not only because they provide shops and services close to where people live and reduce the need to travel, but also because the whole spatial strategy for Reading hinges on the network of centres, particularly central Reading, forming a focus for new development to meet the recognised needs of Reading. The NPPF recognises in paragraph 53 that wholly unacceptable adverse impacts *“could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability”*, albeit that this is unlikely to extend to a whole town centre (this latter element is dealt with further in section 7).

Relevance to types of PDR

- 5.7.24 The types of PDR to which impacts on the high street are most relevant are changes of use from commercial (Part 3 class MA) or various sui generis uses (Part 3 class M and N) to residential. These are the only forms of PDR that would result in the loss of those uses that are specific to high streets. Other forms of PDR either result in new development above existing uses, or, in the case of class ZA, would not apply to retail or related uses.
- 5.7.25 It should be noted in this context that, whilst the Council has policies that prevent an overconcentration of uses such as takeaways, betting shops and payday lenders in centres, it still recognises that they can form an important part of a wider offer of the centre. In any case, a loss to residential is certainly not what the Local Plan envisages, as this would have significantly more detrimental impacts on the centre as a whole compared to a loss of these sui generis uses to an alternative town centre use.
- 5.7.26 Within class M and MA, it is possible to consider the impact of loss of certain uses on the provision of such services, specifically launderettes (in the case of class M) and nurseries and health centres (in the case of class MA). However, this only covers a small part of the implications for high streets from use of these PDR, and are not in any way sufficient to address the identified harm.

Table 5.26: Matrix showing applicability of impacts on high streets to different forms of PDR

Permitted development right	Relevant to issue?
Part 3 Class MA - use class E to residential	✓
Part 3 Class M - takeaway, betting office, payday loan shop or launderette to residential	✓
Part 3 Class N - casino or amusement arcade to residential	✓
Part 20 Class ZA - demolition and rebuild for residential	X
Part 20 Class A - upward extension of purpose-built flats for residential	X

Permitted development right	Relevant to issue?
Part 20 Class AA - upward extension of detached commercial or mixed use building for residential	X
Part 20 Class AB - upward extension of terraced commercial or mixed use building for residential	X
Part 20 Class AC - upward extension of terraced house for residential	X
Part 20 Class AD - upward extension of detached house for residential	X

Relevance to types of area

5.7.27 This harm is only relevant to those areas containing high streets that have been recognised as being of importance. This therefore means the town centre core, likely in this case to equate to the Primary Shopping Area, and to the district and local centres, all of which are designated in the Local Plan. The town centre fringe has some ground floor retail uses along some secondary frontages, but the Local Plan does not consider these important enough to specifically protect within its policy on active frontages. Other commercial areas, such as retail parks, also have significant amounts of retail or related uses, but, again, as these are in out of centre locations they do not benefit from any policy protection.

Table 5.27: Matrix showing applicability of impacts on high streets to different areas

Type of area	Relevant to issue?
Town centre core	✓
Town centre fringe	X
District and local centres	✓
Main arterial routes	X
Employment areas	X
Other commercial areas	X
Residential areas	X

5.8 Affordable housing

- 5.8.1 One of the most significant concerns with the introduction of PDR that results in new dwellings is that there is no mechanism to secure much-needed affordable housing. Affordable housing contributions are secured through a Section 106 agreement, which cannot be a requirement of the prior approval process.
- 5.8.2 There is a very high level of need for affordable housing in Reading. At May 2020, there were 3,417 households on the Housing Register. During 2019-2020, 1,066 households approached the Council at risk of homelessness.
- 5.8.3 The need for affordable housing in Reading was assessed in the Berkshire SHMA (2016), and a need for 406 affordable homes per year was identified. This

compares to an overall housing need of 699 homes per year, and means that almost 60% of new homes would need to be affordable to meet this need.

- 5.8.4 In order to fulfil even a meaningful proportion of this need, affordable housing needs to be sought from all sources, both from private developments and from development by registered providers. The Council has its own Local Authority New Build (LANB) programme which is already delivering new affordable homes, but this must be accompanied by contributions from private development to make a dent in the overall need. In any case, the LANB programme is also partly reliant on contributions from private development, because off-site financial contributions towards affordable housing are mainly used to fund LANB, alongside right to buy receipts.

Affordable housing supply

- 5.8.5 Table 5.28 shows the delivery of new affordable homes after the last ten years and how this relates to overall housing delivery figures.

Table 5.28: Affordable housing delivery 2011-2021

Year	Overall dwellings completed (net)	Affordable dwellings completed (net)	Proportion of completions that are affordable
2011-12	312	148	47.4
2012-13	474	197	41.6
2013-14	361	109	30.2
2014-15	635	145	22.8
2015-16	751	54	7.2
2016-17	717	60	8.4
2017-18	700	66	9.4
2018-19	910	158	17.4
2019-20	524	80	15.3
2020-21	408	54	13.2

- 5.8.6 It is clear that the delivery of affordable housing has declined over that ten year period, both in overall terms and in terms of the proportion of all housing completions. There has been an increase again since 2018, assisted by the start of delivery of the LANB programme, but has not returned to pre-2015 levels. The most significant decline took place between 2012-13 and 2015-16. This is the same period in which completions from PDR began to come on stream, as shown in [table 4.2](#).
- 5.8.7 The extent of the impact of PDR on overall affordable housing delivery is not possible to conclusively demonstrate, and it is likely that other factors may well have played a role such as changing viability conditions and national policy on viability assessments. However, it is a fact that PDR significantly affected the proportion of residential developments that were able to make an affordable housing contribution. In the seven years before office to residential PDR were introduced (2006-2013), 8.6% of dwellings completed in Reading were from an

application route where a legal agreement cannot be applied (usually certificates of lawfulness). In the seven years afterwards (2013-2020), 24.7% of dwellings completed were from a source where a legal agreement cannot be applied. It is therefore clear that the introduction of PDR has at the very least contributed to a decline in affordable housing delivery.

Potential affordable housing delivery of PDR schemes

- 5.8.8 It is possible to estimate the contribution that PDR schemes would have made to affordable housing had the development been approved by the full planning application route. Whilst it cannot be certain that this level of affordable housing delivery would have been seen had PDR not been introduced, it is nevertheless a worthwhile exercise to help to understand the impact of PDR on affordable housing supply.
- 5.8.9 The starting point for this assessment is to assume that developments would have delivered a policy compliant level of affordable housing, which is the clear expectation of local policy in both the current Local Plan and its predecessor documents. Clearly, in practice, policy compliance is not always achieved, but, as this is subject to individual negotiations on each site, it is not possible to know how the overall figures would have been affected.
- 5.8.10 The applicable affordable housing policy has changed over the period since office to residential PDR was introduced in 2013:
- For sites of 15 dwellings or more, an on-site contribution has always been required. Up to January 2015, the contribution required was 50%. However, an alteration to the Core Strategy was adopted in January 2015 which reduced this to 30%, and the 30% figure was carried forward into the Local Plan adopted in November 2019.
 - For sites of 10-14 dwellings, the relevant affordable housing policy has required an on-site contribution of 30% across the whole period considered.
 - For sites of 10 dwellings or less, the policy in place has required contributions of 20% for sites of 5-9 dwellings and 10% for sites of 1-4 dwellings across the period considered. However, the way these policies have been applied have been affected by changes to national policy. A Written Ministerial Statement in November 2014 sought to ensure that developments of this size should not be required to make a contribution to affordable housing. However, Reading Borough Council (along with West Berkshire District Council) challenged this Statement in the High Court, and in the meantime continued to apply its local policy. Ultimately, this process led to a judgement in the Court of Appeal which confirmed the national policy approach, but specifically noted that national policy cannot override adopted local policies where that approach is justified. The Council took the decision in July 2016 that it would cease applying the affordable housing requirement to sites which involved changes of use from existing buildings to residential for less than ten dwellings, and this would have applied to many of the PDR developments had a planning

application been required. This changed again with the adoption of the new Local Plan in November 2019, with changes of use of all sizes being required once again to contribute.

- Additionally, for sites of 5-9 dwellings, up until the adoption of the Local Plan in 2019, the 20% contribution was expected to be on-site. This was changed in the Local Plan to require a financial contribution.

5.8.11 For the purposes of this assessment, therefore, the contribution that would have been made is based on the local policy and approach in place at the time prior approval was granted as described above.

5.8.12 Where an on-site contribution would have been required, this is generally a straightforward calculation, and for the purposes of this assessment the number of dwellings that would have been provided is rounded to the nearest whole number.

5.8.13 For off-site financial contributions, the calculation is more complicated, because the contribution is based on the Gross Development Value (GDV) of the specific scheme, and therefore varies greatly from development to development. However, evidence²² that was prepared to inform the Local Plan examination in reference to affordable housing from small sites calculated the average financial contribution per dwelling that was agreed for both sites of 1-4 dwellings and 5-9 dwellings at the time. For sites of 1-4 dwellings, on average £12,423 per dwelling had been secured, whilst for sites of 5-9 dwellings, on average £10,478 per dwelling had been secured. These figures are therefore applied to the PDR developments to assess the financial contributions that have been missed.

Table 5.29: Affordable housing contributions that could have been expected had PDR developments 2013-21 been full planning applications

Type of affordable housing contribution	PDR developments completed 2013-21	PDR developments under construction at 31/03/21	PDR developments not started at 31/03/21	Total
Policy compliant on-site contribution in units	356	51	104	511
Policy compliant off-site financial contribution (estimate)	£1,244,998	£95,494	£516,245	£1,856,737

5.8.14 Table 5.29 shows the contributions that might have been expected. For those developments that have been completed, we would have generally expected the contributions to already have been made, as on-site units would have been passed to a registered provider whilst financial contributions are generally due prior to occupation. For developments under construction and not started, these contributions would have been pending. It can be seen that 356 on-site dwellings would have already been provided, with a further 155 still to be provided. In terms

²² [Additional Justification on Policy H3 on Small Site Affordable Housing, May 2019 - see p8, footnote 1](#)

of financial contributions, an estimated £1.245 million would already have been received, with a further £0.612m to be provided.

- 5.8.15 It is therefore estimated that, as a result of completed or outstanding prior approvals, Reading has lost out on **511 affordable dwellings** and **£1.857 million in financial contributions towards affordable housing**.
- 5.8.16 The dwellings that would have been provided on-site would have fulfilled more than a year's worth of the assessed need for affordable housing.
- 5.8.17 The off-site financial contributions would almost certainly have been put towards the LANB programme. Assumptions used in the Additional Justification on Policy H3 on Small Site Affordable Housing (May 2019) which informed the Local Plan allocation were that a £100,000 financial contribution can deliver one dwelling, on the basis that this would be used to subsidise part of the build and borrow for the remaining costs. This would mean that the financial contributions lost could have delivered a further 19 affordable homes.
- 5.8.18 Given the scale of the identified affordable housing needs and the difficulties that the Council faces in meeting even a meaningful proportion of that need, it is of considerable harm to the planning of the area that so many private developments are not required to contribute towards affordable housing.
- 5.8.19 The Council is aware of the proposals in the Planning White Paper to bring affordable housing within a consolidated infrastructure levy, to which PDR developments will be subject. However, based on the White Paper, the Council has serious concerns about whether this will result in any improvement to the current system. These concerns include the proposal to set the levy nationally, which is unlikely to result in contributions being maximised in the local area, and the provisions for how and when the levy is secured, which appear to be some time after development is completed. It is also not clear whether current Community Infrastructure Levy (CIL) provisions around not needing to pay if a building is partly occupied will carry across, because this currently means that in practice changes of use under PDR almost never pay CIL.

Wholly unacceptable adverse impacts

- 5.8.20 Provision of adequate affordable housing is one of the most significant planning issues that Reading faces. The assessed annual need for affordable housing equates to more than half of the total housing need, and all sources of supply must contribute towards meeting that need. The importance of providing sufficient affordable housing is one of the key objectives of the Local Plan, and policies are included to ensure that new developments make an appropriate contribution. Allowing a significant element of the supply of new homes to continue without making any contribution to affordable housing makes it even more difficult to meet these needs, and places greater pressure on the remaining sources to contribute. This is considered to clearly be a wholly unacceptable impact.

Relevance to types of PDR

- 5.8.21 The lack of provision for affordable housing is relevant to all types of PDR, because all result in housing that would otherwise contribute to meeting Reading's substantial affordable housing needs.

Table 5.30: Matrix showing applicability of affordable housing to different forms of PDR

Permitted development right	Relevant to issue?
Part 3 Class MA - use class E to residential	✓
Part 3 Class M - takeaway, betting office, payday loan shop or launderette to residential	✓
Part 3 Class N - casino or amusement arcade to residential	✓
Part 20 Class ZA - demolition and rebuild for residential	✓
Part 20 Class A - upward extension of purpose-built flats for residential	✓
Part 20 Class AA - upward extension of detached commercial or mixed use building for residential	✓
Part 20 Class AB - upward extension of terraced commercial or mixed use building for residential	✓
Part 20 Class AC - upward extension of terraced house for residential	✓
Part 20 Class AD - upward extension of detached house for residential	✓

Relevance to types of area

- 5.8.22 This harm relevant to all areas, because developments across the Borough would have been expected to contribute towards meeting Reading's substantial affordable housing needs.

Table 5.31: Matrix showing applicability of affordable housing to different areas

Type of area	Relevant to issue?
Town centre core	✓
Town centre fringe	✓
District and local centres	✓
Main arterial routes	✓
Employment areas	✓
Other commercial areas	✓
Residential areas	✓

5.9 Contribution to local infrastructure

- 5.9.1 As seen in the previous section, the prior approval process for PDR development cannot include requiring completion of a Section 106 agreement. As well as preventing necessary contributions towards affordable housing, this means that

specific impacts on local infrastructure cannot be mitigated through the agreement.

5.9.2 The types of contributions towards infrastructure that a Section 106 agreement may cover include the following in particular:

- Education;
- Leisure and open spaces;
- Transport; and
- Skills and training initiatives.

5.9.3 In this context, it is worth noting that, for most developments, contributions towards education and leisure/open spaces in Reading have been dealt with by the Community Infrastructure Levy (CIL) since 2015. PDR developments are not in theory excluded from the need to pay CIL, although in practice changes of use under PDR almost never do pay because they are able to fulfil the requirement to demonstrate that a building has been partly occupied in lawful use for six months within the last three years. An Article 4 direction would not change this situation because the CIL rules would apply in the same way to planning applications. However, for particularly large developments, or developments with specific impacts on infrastructure, the option to address this in a Section 106 agreement is lost through PDR. This will be considered further below.

Education

5.9.4 New development can have an impact on the need for additional school places or other upgrades to education facilities. Until the introduction of CIL in Reading on 1st April 2015, this was a matter that was covered by a Section 106 contribution, calculated in line with the relevant Supplementary Planning Document at the time.

5.9.5 It is therefore possible to calculate the contributions towards education that would have been secured under Section 106 agreements that would have been signed before the introduction of CIL.

5.9.6 Up to 20th November 2013, the relevant calculations were set out in the Supplementary Planning Guidance from 2004, which resulted in contributions as follows:

- £0 per 1-bed flat
- £1,632 per 2-bed flat
- £4,120 per 3-bed flat or larger

5.9.7 On 20th November 2013 a new Revised SPD (adopted 20th November 2013) was adopted which required the following contributions:

- £0 per 1-bed flat
- £2,795 per 2-bed flat
- £5,667 per 3-bed flat or larger

- 5.9.8 Using those calculations as a basis, and considering only those developments which have been implemented and would therefore have already paid any required contribution, it is estimated that, had those developments permitted under PDR before the introduction of CIL been planning applications with relevant Section 106 agreements, the Council would have received **£261,755 towards education infrastructure**.
- 5.9.9 Compared to some of the other impacts, the education contributions would have been more limited, in particular because of the dominance of 1-bed dwellings within PDR developments, which under the applicable policy did not contribute towards education. However, this would nonetheless have been an important contribution towards much-needed education infrastructure.
- 5.9.10 As set out above, since 2015 education contributions have been made through CIL. There remains the possibility of agreeing Section 106 contributions where they could be specifically linked to demands created by the development, but in the case of education this specific link is hard to demonstrate unless a scheme is very large, larger than any of the PDR developments that have taken place so far. As so few PDR developments actually pay CIL, it is certainly the case that the education infrastructure impacts of PDR developments are not being mitigated by the developments, but it is also the case that this is mainly due to the CIL Regulations rather than PDR and that a proposed Article 4 direction is unlikely to resolve the issue.

Leisure and open space

- 5.9.11 New development can have an impact on the need for open space and leisure facilities. As for education infrastructure, until the introduction of CIL in Reading on 1st April 2015, this was covered by a Section 106 contribution, calculated in line with the relevant Supplementary Planning Document at the time.
- 5.9.12 Once again, it is worth calculating the contributions that would have been made to leisure and open spaces through Section 106 had PDR developments approved before 1st April 2015 been made as planning applications.
- 5.9.13 In the 2004 SPG, applicable up until November 2013, the following leisure contributions were required:

- £1,500 per dwelling of up to 75 sq m
- £2,000 per dwelling of more than 75 sq m.

In practice, almost all PDR dwellings would be under the 75 sq m threshold.

- 5.9.14 In the Revised SPD adopted on 20th November 2013, this changed to the following contributions:
- £2,100 per dwelling of up to 75 sq m
 - £2,800 per dwelling of more than 75 sq m

- 5.9.15 Using those calculations as a basis, and considering only those developments which have been implemented and would therefore have already paid any required contribution, it is estimated that, had those developments permitted under PDR before CIL was introduced been planning applications with relevant Section 106 agreements, the Council would have received **£1,273,100 towards open space and leisure infrastructure**.
- 5.9.16 This therefore represents a considerable loss to mitigation of open space and leisure impacts over what was a short period of only two years between 2013 and 2015.
- 5.9.17 In terms of ongoing impacts now that CIL is in place, in most cases it would be CIL that would fund leisure and open space contributions, whether for PDR developments or planning applications. However, it is likely that some larger developments would still be required to make contributions towards site-specific open space and leisure impacts of that development, as it is more possible to link impacts to a specific development than it is for education. This is particularly the case because developments without any private amenity space - as is the case for the vast majority of PDR developments - are much more likely to impact on existing open spaces because residents would have no option but to use public facilities. It is therefore likely that there is an ongoing harm to leisure and open space infrastructure from PDR that could be at least partially resolved by use of an Article 4 direction.

Transport

- 5.9.18 Whilst transport impacts of a PDR development cannot be mitigated through a Section 106 agreement, transport impacts are nevertheless identified as a matter that can be considered through the prior approval process for all relevant forms of PDR. Therefore, if a proposed development requires additional transport measures to be put in place to be acceptable, the option remains open for the local planning authority to refuse to give prior approval. In terms of the PDR development that has taken place so far in Reading, almost all of this involved conversions of offices to residential, and it is likely that offices would have generated more vehicle trips from the same floorspace in any case, so significant transport impacts are unlikely. They would be more likely from the various forms of PDR resulting in additional development, but as above, prior approval allows consideration of transport impacts. Therefore, impacts specifically on transport infrastructure do not form part of the argument for an Article 4 direction.

Skills and training

- 5.9.19 Among the forms of infrastructure identified as a priority for contributions under Local Plan policy CC9 are economic development services and infrastructure, including employment, skills and training initiatives. The Council has an Employment, Skills and Training SPD (adopted April 2013) in place which sets out the specific requirements. These requirements apply to all major developments. For major employment developments, there are both construction and end-user

requirements, whilst for housing developments these relate to the construction phase only.

- 5.9.20 The requirements for a major housing development (of 10 dwellings or more) are that a developer prepare a construction phase Employment and Skills Plan (ESP) based on construction benchmarks from the National Skills Academy for Construction projects and labour market patterns in the industry. If the developer does not wish to prepare a plan, a financial contribution can be made to employment and skills based on a formula in the SPD.
- 5.9.21 As ESPs or associated financial contributions are secured through Section 106 agreements, PDR developments are not required to comply with these requirements. As such, significant developments are taking place without policy compliant contributions towards employment and skills, which represents a harm to economic development initiatives in the local area. Unlike some other forms of contribution, employment and skills are not covered by CIL and therefore contributions continue to be sought from every major development in Reading by Section 106. An Article 4 direction would result in contributions from relevant developments being made towards impacts on employment and skills.
- 5.9.22 It is not possible to calculate the difference that this would make in terms of financial contributions, because the first preference in policy is the preparation of an ESP rather than a financial contribution. In an ideal world therefore, no money would be collected and each developer would produce their own plan. For context, the Council collected around £315,000 towards employment and skills from all developments in 2019-20.

Summary

- 5.9.23 In summary therefore, there has already been harm caused to the adequate mitigation of local infrastructure by the potential loss of £1.27 million of contributions towards open spaces and leisure and £0.26 million towards education. Ongoing harm is particularly related to the inability to address site-specific open space and leisure impacts, particularly where there is no on-site private amenity space, and the lack of contribution towards employment and skills.

Wholly unacceptable adverse impacts

- 5.9.24 It is the clear expectation of policy CC9 of the Local Plan that development should not be permitted unless infrastructure impacted upon as a result of the development or made necessary by the development is provided through direct provision or financial contribution. If infrastructure required as a result of the development is not funded by the development, which is the case with PDR, then it will need to be addressed by public funds. Without use of an Article 4 direction, significant numbers of PDR developments will continue to take place without making necessary contributions to infrastructure, which represents a wholly unacceptable adverse impact on Reading.

Relevance to types of PDR

5.9.25 The lack of contribution towards local infrastructure is relevant to all types of PDR, because all result in housing that would otherwise contribute towards this infrastructure.

Table 5.32: Matrix showing applicability of contributions to local infrastructure to different forms of PDR

Permitted development right	Relevant to issue?
Part 3 Class MA - use class E to residential	✓
Part 3 Class M - takeaway, betting office, payday loan shop or launderette to residential	✓
Part 3 Class N - casino or amusement arcade to residential	✓
Part 20 Class ZA - demolition and rebuild for residential	✓
Part 20 Class A - upward extension of purpose-built flats for residential	✓
Part 20 Class AA - upward extension of detached commercial or mixed use building for residential	✓
Part 20 Class AB - upward extension of terraced commercial or mixed use building for residential	✓
Part 20 Class AC - upward extension of terraced house for residential	✓
Part 20 Class AD - upward extension of detached house for residential	✓

Relevance to types of area

5.9.26 This harm relevant to all areas, because developments across the Borough would have been expected to contribute towards local infrastructure.

Table 5.33: Matrix showing applicability of contributions to local infrastructure to different areas

Type of area	Relevant to issue?
Town centre core	✓
Town centre fringe	✓
District and local centres	✓
Main arterial routes	✓
Employment areas	✓
Other commercial areas	✓
Residential areas	✓

6. Scope of Article 4 direction required

6.0.1 The previous section has discussed the different forms of harm that occur as a result of the PDR, and, in the case of each type of harm, considers the degree to which it applies to the different forms of PDR and to the different areas of Reading. This section summarises the results of that assessment in terms of which forms of PDR should be covered by the direction and to which types of geographical area it should be applied, and looks to define that geographical area more specifically.

6.1 Types of permitted development to be covered

6.1.1 For each of the forms of harm covered in section 5, all of which have been considered to be wholly unacceptable adverse impacts, a matrix is included which assess the degree to which it is applicable to each type of PDR. These assessments are compiled in table 6.1 below.

Table 6.1: Matrix showing applicability of types of harm to types of permitted development right

Type of area	Dwelling size and type (5.1)	Dwelling standards (5.2)	Noise and disturbance (5.3)	Air quality (5.4)	Loss of employment (5.5)	Impact on existing businesses (5.6)	Impact on the high street (5.7)	Affordable housing (5.8)	Infrastructure contributions (5.9)
Part 3 class MA	✓	✓	✓	✓	✓	✓	✓	✓	✓
Part 3 class M	✓	✓	✓	✓	X	✓	✓	✓	✓
Part 3 class N	✓	✓	✓	✓	X	✓	✓	✓	✓
Part 20 class ZA	✓	✓	✓	✓	✓	✓	X	✓	✓
Part 20 class A	✓	✓	X	✓	X	X	X	✓	✓
Part 20 class AA	✓	✓	✓	✓	X	✓	X	✓	✓
Part 20 class AB	✓	✓	✓	✓	X	✓	X	✓	✓
Part 20 class AC	✓	✓	X	✓	X	X	X	✓	✓
Part 20 class AD	✓	✓	X	✓	X	X	X	✓	✓

6.1.2 Table 6.1 shows that for one form of PDR, Part 3 class MA, all of the forms of harm identified in this report apply. This is the form of PDR which is likely to comprise the vast majority of PDR developments over the coming years because of its

extremely wide-ranging nature. Changes of use from commercial to residential should therefore clearly be covered by any Article 4 direction.

- 6.1.3 Demolition and rebuild (Part 20, class ZA) can give rise to all of the identified forms of harm other than impact on high streets, whilst changes of use from selected sui generis uses (Part 3, class M and N) can give rise to all bar the loss of employment floorspace. Upward extension of commercial uses does not result in the loss of existing premises, so would not result in a significant detrimental impact on high streets or employment floorspace, but can negatively affect the potential for businesses to expand and cause noise and disturbance issues. These are forms of harm beyond the forms that would apply to all types of PDR, and this should therefore also be covered in the direction.
- 6.1.4 For those forms of PDR that involve additional residential storeys on either an existing block of flats or existing dwellinghouses (Part 20 classes A, AC and AD), the only forms of harm that are identified are the same that would apply to any form of PDR that results in new residential accommodation (e.g. lack of affordable housing, dwelling size and type). The issues for these three forms of PDR are different from the others, because they do not bring residential into areas where there are not already residents, therefore resulting in the kinds of conflicts outlined in this report. Because the issues are entirely distinct, it is not considered that these forms of PDR should be included in the proposed Article 4 direction. That does not mean that the harm identified here is considered acceptable, but rather that it is best addressed separately.
- 6.1.5 Therefore, the following forms of PDR should be covered in the Article 4 direction.
- Change of use of commercial, business and service use (use class E) to residential (Part 3, class MA);
 - Change of use of hot food takeaway, betting office, payday loan shop or launderette to residential (Part 3, class M);
 - Change of use of casino or amusement arcade to residential (Part 3, class N);
 - Demolition of single, purpose built, detached block of flats or a single, detached office, light industrial or research and development building and its replacement with a detached block of flats or detached house (Part 20, class ZA);
 - Up to two additional residential storeys on a detached commercial or mixed use building (in use for retail, financial and professional, restaurant and café, office, research and development, light industrial, betting shop, payday loan shop, launderette) (Part 20, class AA); and
 - Up to two additional residential storeys on a two or more storey terraced commercial or mixed use building (see class AA for uses) or one additional storey on a one storey building (Part 20, class AB).

6.2 Types of area to be covered

6.2.1 In the previous section, an assessment is made whether each of the identified forms of harm applies in each of the broad areas. This is summarised once again in table 6.2.

Table 6.2: Matrix showing applicability of main types of harm to geographical areas

Type of area	Dwelling size and type	Dwelling standards	Noise and disturbance	Air quality	Loss of employment	Impact on existing businesses	Impact on the high street	Affordable housing	Infrastructure contributions
Town centre core	✓	✓	✓	✓ (partial)	✓	✓	✓	✓	✓
Town centre fringe	✓	✓	✓ (partial)	X	✓	✓ (partial)	X	✓	✓
District and local centres	✓	✓	X	X	X	X	✓	✓	✓
Main arterial routes	✓	✓	✓ (partial)	✓ (partial)	X	X	X	✓	✓
Employment areas	✓	✓	✓	X	✓	✓	X	✓	✓
Other commercial areas	✓	✓	✓	X	X	✓	X	✓	✓
Residential areas	✓	✓	X	X	X	X	X	✓	✓

6.2.2 A number of the forms of harm are not area-specific, and would apply in any location, namely dwelling size and type, dwelling standards, affordable housing and infrastructure contributions. The only way to ensure that this harm does not occur in Reading would be by a whole Borough Article 4 direction. The Written Ministerial Statement by the Secretary of State on 1st July 2021 made clear that Article 4 directions are “*not expected to be applied to an entire local authority area*”. This approach is not therefore recommended. This would also mean that primarily residential areas would not be covered by the direction, as, other than those forms of harm that apply everywhere, no forms of harm specific to those areas have been identified.

6.2.3 The other types of area all have at least one form of harm that is likely to occur there in addition to those that occur regardless of location, as set out below:

- In the core of the town centre, all of the forms of harm identified apply, although air quality is very locally specific;
- The town centre fringe is an important location for employment space, particularly cheaper office stock, which therefore means that loss of employment applies here. Impacts in terms of noise and impacts on existing

businesses occur mainly in the parts of the town centre fringe that are wholly commercial;

- The main form of harm affecting district and local centres is to the function of the high streets, but as has been shown this is potentially extremely significant;
- On main arterial routes, the additional form of harms are air quality and noise, but these are limited to the small areas of the poorest air quality, as well as some specific areas of particular road noise which tend to fall within some of the areas dealt with above in other case;
- In employment areas, loss of employment is a key issue, as is noise and disturbance and impacts on existing businesses; and
- For other commercial areas, the main additional impacts are noise and disturbance and impacts on existing businesses.

6.2.4 It is therefore considered that there is evidence to support an Article 4 direction covering those types of area where forms of adverse impact other than those that apply regardless of location would occur. This would comprise:

- The whole town centre (including both core and fringe);
- District and local centres;
- Important employment areas;
- Other entirely commercial areas; and
- The areas of poorest air quality.

6.2.5 The remainder of this section examines how these areas should be defined in more detail to come up with an initial area to potentially be covered by the Article 4 direction.

Town centre core

6.2.6 As has been shown in the previous section, many of the forms of harm that have been identified apply particularly in the town centre core of Reading. In particular, this is the area with the most significant concentration of retail and related high streets uses which could be eroded by the use of PDR. It is also the location where some of the greatest noise impacts are likely to be felt, from activities associated with commercial activities but also from outdoor activities and events and other sources. Some of the areas of poorest air quality are in and around the town centre core. The town centre is also a very important concentration of employment uses, and residential in inappropriate locations can also have an impact on the operation of some of those businesses.

6.2.7 There are a number of possible definitions of the town centre core. For some, this is often defined as the area within the Inner Distribution Road (IDR). However, there are some areas within the IDR (such as around Fobney Street) which are almost purely residential, whilst in other areas such as Oxford Road, the commercial core extends up to and arguably beyond the IDR. It also depends to some degree on which uses are being considered. The retail hub of the town centre

is around Broad Street and the Oracle, whilst the office hub is further north, around the station.

- 6.2.8 The definition that most closely accords with the commercial core of central Reading is the Primary Shopping Area as defined in the Local Plan (policy CR1). This covers the key retail streets around Broad Street, Friar Street, the Oracle and Broad Street Mall shopping centres, and also extends up to and beyond Reading station to reflect the importance of the station area, activated by ground floor retail and leisure activity, to the Local Plan strategy. It includes all of the designated primary frontage under policy CR7 of the Local Plan, but excludes areas which are mainly residential, such as around Fobney Street and the streets west of Greyfriars Road. It also excludes areas of mainly office such as around Valpy Street, Forbury Square and Abbey Square.
- 6.2.9 The Primary Shopping Area, as part of the Local Plan, has been through the consultation and examination processes relatively recently, and has been found to be sound. It therefore represents a robust basis for the Article 4 direction as far as the town centre core is concerned. The area is shown in figure 6.1.

Figure 6.1: Primary Shopping Area of central Reading



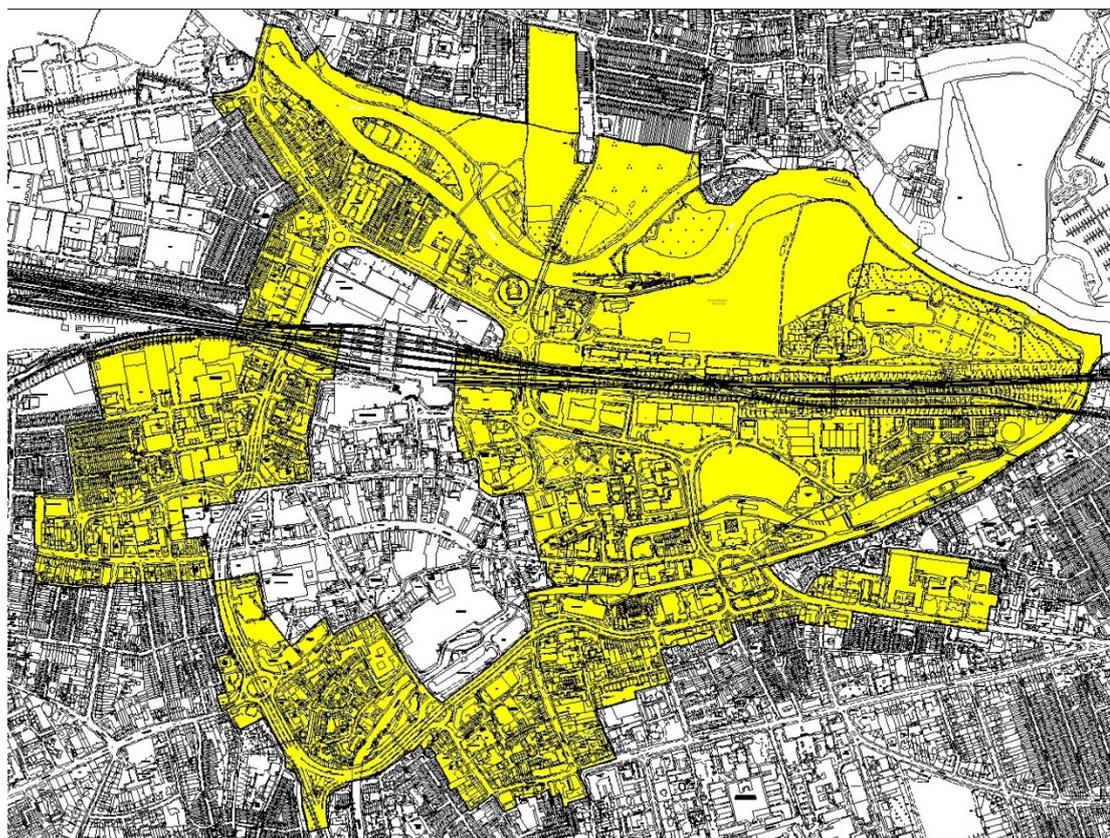
Town centre fringe

- 6.2.10 The town centre fringe includes a mix of commercial, residential and other uses. Because residential development is more of a feature of this mix, some of the

concerns related to the town centre core do not apply. In particular, there is less need to protect high street uses, because any shopping frontages in these areas are very much secondary in nature. In addition, issues such as noise and impacts on existing businesses only apply to those parts of the fringe which are wholly commercial, in particular edge-of-centre retail parks. However, the town centre fringe is important in terms of employment floorspace, as this is where the most significant concentrations of grade B office floorspace tend to occur, and these are often of importance for small and medium sized businesses.

6.2.11 The Local Plan includes a definition of central Reading, to which the town centre policies apply. This definition goes significantly beyond the Primary Shopping Area to include any areas that are not mainly residential. This definition was part of the Local Plan, and has therefore been subject to consultation and public examination, and represents a robust basis for these purposes. The town centre fringe should therefore be considered to be the whole defined area of central Reading outside the Primary Shopping Area. This is shown in figure 6.2.

Figure 6.2: Area of central Reading outside Primary Shopping Area



District and local centres

6.2.12 The potential harm to high streets has been well documented in section 5.7, and, as well as the core of the town centre, this applies equally to the smaller centres that are found around the whole borough. In fact, the harm that could occur here is potentially greater due to the lower amounts of existing floorspace and the

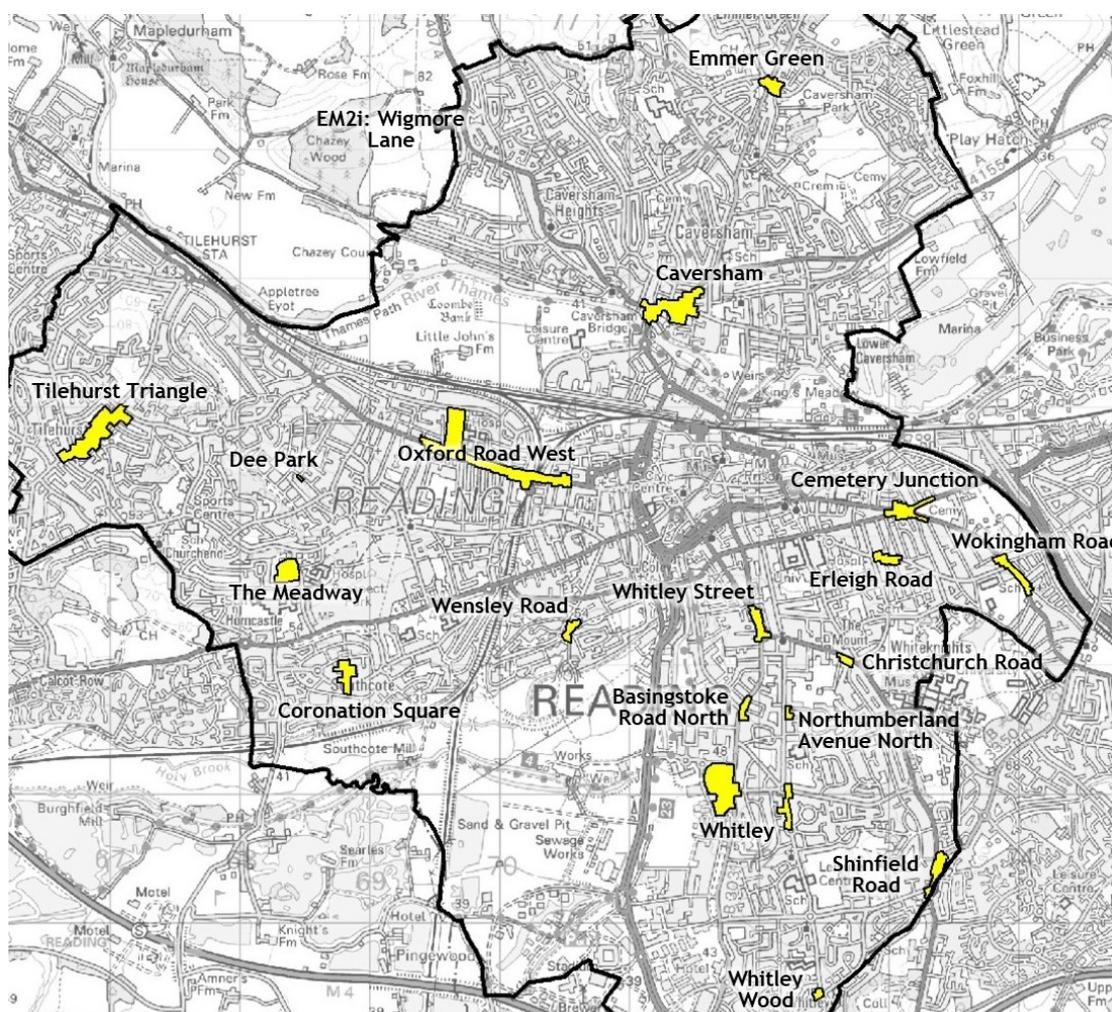
potential that the health of a centre could be completely altered by only a handful of developments.

6.2.13 The Local Plan identifies a network of smaller centres in policy RL1, as follows:

- District centres: Caversham, Cemetery Junction, Emmer Green, Meadway, Oxford Road West, Shinfield Road, Tilehurst Triangle, Whitley;
- Major local centres: Whitley Street, Wokingham Road
- Local centres: Basingstoke Road North, Christchurch Road, Coronation Square, Erleigh Road, Dee Park, Northumberland Avenue North, Wensley Road, Whitley Wood.

6.2.14 Figure 6.3 shows the location of these centres.

Figure 6.3: District and local centres as defined in the Local Plan



6.2.15 These centres have been identified because they form important groupings of local shops and services that serve their surrounding catchments and prevent the need to make longer journeys to central Reading or elsewhere. Whilst some have more significant groupings of retail facilities, for many it is the diversity of facilities available that means that they play an important role for their local areas and need to be protected. In addition, for some centres such as the Meadway and

Whitley, a clear need has been identified for expansion or regeneration of those centres to better serve their catchments.

6.2.16 The reasons for the designation of these particular centres, and the definition of their boundaries, was set out in the Local Plan Background Paper which supported the Local Plan at examination. The boundaries have been drawn to include more than just the main retail frontages, but to include all facilities that make up part of the diversity of the offer of the centre, and also to include any clear opportunities for expansion of those centres. The definition of these boundaries has been through the consultation and examination process and therefore represent a robust basis for an Article 4 direction.

Important employment areas

6.2.17 Section 5.5 has demonstrated the harm caused by loss of important employment floorspace, whilst section 5.6 has also outlined the issue in terms of the impact on existing businesses of introduction of residents into inappropriate areas. In addition, section 5.3 has outlined the impacts of high levels of noise on new residents.

6.2.18 The Council has already gone through a process of identifying its most important employment areas, as part of its Local Plan (adopted 2019). These are identified as Core Employment Areas under policy EM2. The purpose of those areas was twofold. Firstly, they are areas to which new major employment development other than offices (including industrial and warehouse) were directed under policy EM2. This was important, because the Local Plan identifies a need of an additional 148,000 sq m of industrial and warehouse space, and, whilst new allocations were identified to meet much of this need, this would also require some intensification of the Core Employment Areas. Secondly, these areas were identified to protect the existing important employment land under policy EM3, 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 well as providing a source of jobs with varied skills requirements within close proximity of much of the Borough, in particular those areas with high levels of deprivation.

6.2.19 Substantial evidence was compiled to identify those employment areas of greatest importance. An Employment Area Analysis²³ was produced in March 2018, which aimed to investigate the following matters:

1. Identify which employment areas are critical to the economy of Reading and the surrounding area and should be protected, and which areas may have potential for release to other uses; and
2. Identify any potential for existing employment areas to accommodate additional employment development to help meet the identified needs.

²³ [Reading Employment Area Analysis, March 2018](#)

6.2.20 The analysis divided every employment area up into 'plots' which reflected potentially developable parcels of land. Each plot was then assessed under the following headings to consider whether it needed to be retained for employment use or whether it could have potential for other uses:

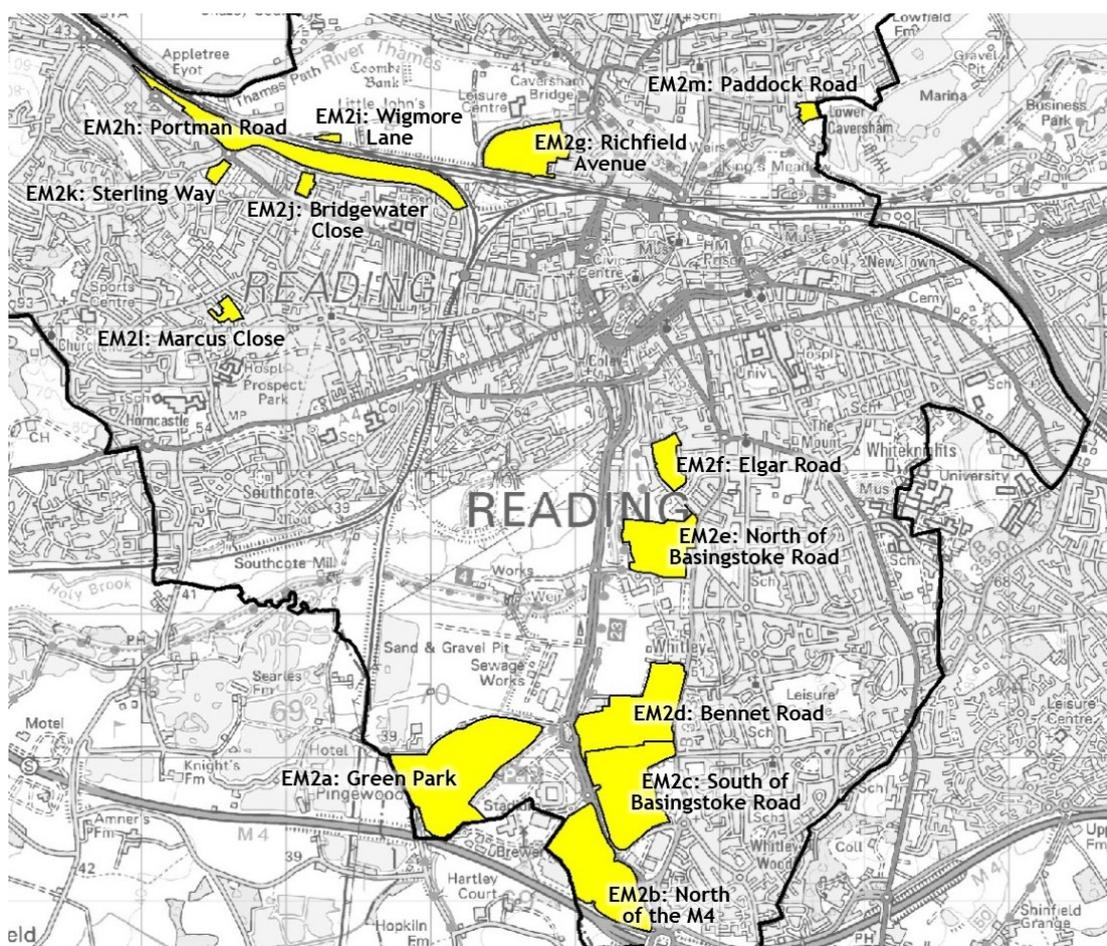
- Quality of the existing internal environment;
- Quality of the existing wider environment;
- Strategic access;
- Market considerations, perception and demand;
- Ownership and user constraints;
- Site development constraints;
- Accessibility;
- Sequential considerations; and
- Policy considerations.

6.2.21 The detailed matters considered under each of those headings are set out in the document itself, and, for each heading and each plot, a conclusion was reached in terms of whether there was potential for release of the site for alternative uses - "yes", "possibly" or "no". This led to an overall conclusion as to whether or not the employment use should be retained, and those areas where the conclusion was that retention of employment was necessary were then defined as Core Employment Areas.

6.2.22 The approach to the definition of Core Employment Areas has not therefore been a blanket protection of all employment areas. Each was considered in detail in terms of a number of factors, and substantial areas of employment were not protected. Approximately 30 ha of the employment land considered in the Employment Area Analysis was excluded from this definition. Some of this land was then brought forward as a Local Plan allocation for residential use, such as SR2 (Land North of Manor Farm Road), SR4a (Pulleyn Park), WR3a (Former Cox and Wyman site) and WR3b (2 Ross Road and part of Meadow Road). The areas that are protected for employment use benefit from such protection for good reason. This approach was discussed at the Local Plan examination and was considered to be sound.

6.2.23 Therefore, the designated Core Employment Areas, which are essential to the local economy of Reading, should be covered by the Article 4 direction. Prior approvals have recently begun to be granted in these areas for development that would be wholly inappropriate, and it is vital that further such proposals are prevented. The Core Employment Areas are shown in figure 6.4.

Figure 6.4: Core Employment Areas as defined in the Local Plan



Other primarily commercial areas

6.2.24 In addition to those areas characterised by mainly commercial uses and which are specifically identified in the Local Plan such as Core Employment Areas and defined centres, there are other areas of almost entirely commercial use. The issue in these areas is not the need to protect those uses (as the Local Plan does not seek to specifically do so), but is particularly around noise impacts from existing uses (see section 5.3) and the operation of existing businesses (see section 5.6).

6.2.25 These types of areas vary, but typically include retail parks, out of town leisure locations and operational locations for Reading's infrastructure. Placing residential in these locations would mean noise and disturbance for those residents directly from the businesses themselves but also through associated deliveries by HGV. It would also likely lead to conflict between uses and complaints that meant that intensification or expansion of existing businesses in situ were made difficult.

6.2.26 Figure 6.5 shows the location of those significant commercial areas not covered by other designations and within which there is no existing residential development. It is important to note that there may still be some scope for residential development within those areas, but that this would need to be judged through a planning application. A particular issue is whether residential comes forward within a

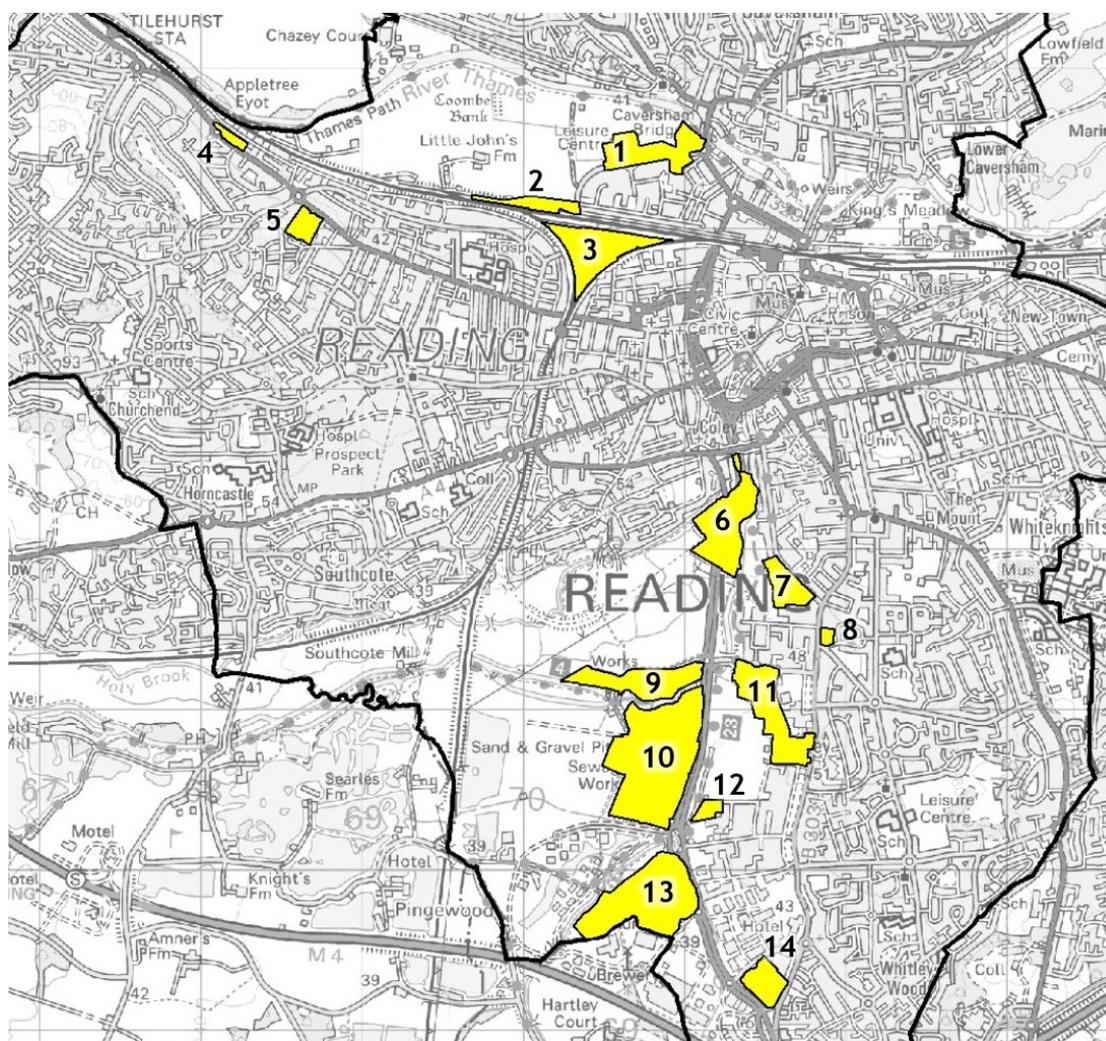
sensible development boundary where the quality of life can be maintained. For instance, the area north of Manor Farm Road is identified as an allocation for a residential-led development in the Local Plan. However, the relevant policy, SR2, makes absolutely clear that development will:

“Not be piecemeal in nature but will only be in appropriately sized/arranged sites that will promote the integration of Kennet Island with the established areas of Whitley to the east.”

PDR development within this area will almost certainly be piecemeal in nature, and would as a result be in direct contradiction of the relevant local plan policy. Similar issues apply on many of the other sites, for instance if a single retail warehouse were to change use to residential without others coming forward.

6.2.27 These other commercial areas are shown on figure 6.5.

Figure 6.5: Location of other commercial areas



6.2.28 The areas shown on the map are described below:

1. Mixed commercial areas around Richfield Avenue adjoining the Core Employment Area, including leisure, food and drink and vehicle dealership uses;
2. Area of buildings for railway use at Cow Lane;
3. Area on Cow Lane for railway use and some additional employment uses;
4. Superstore adjoining the Core Employment Area on Oxford Road;
5. Reading Retail Park, Oxford Road;
6. Mixed commercial area along Rose Kiln Lane including offices, vehicle dealerships, industry and warehousing, casino and Reading Link Retail Park;
7. Area west of Elgar Road South containing employment uses and a large retail warehouse;
8. Three employment units east of Basingstoke Road;
9. Water treatment works and former laboratory and fish farm west of the A33
10. Area around Island Road containing employment uses, sewage treatment works, recycling centre, and former greyhound and speedway stadium site. The main new industrial and warehouse allocations in the Local Plan are within and adjoining this area;
11. Area along Gilette Way including mixed employment location of offices, industry and warehousing (including dedicated small business units) and the Brunel Retail Park;
12. Area of employment uses on Smallmead Road outside the Core Employment Area;
13. Madejski Stadium and surrounds and the Reading Gate Retail Park; and
14. New commercial area provided as part of a recent development incorporating retail warehouses, industrial units and a hotel.

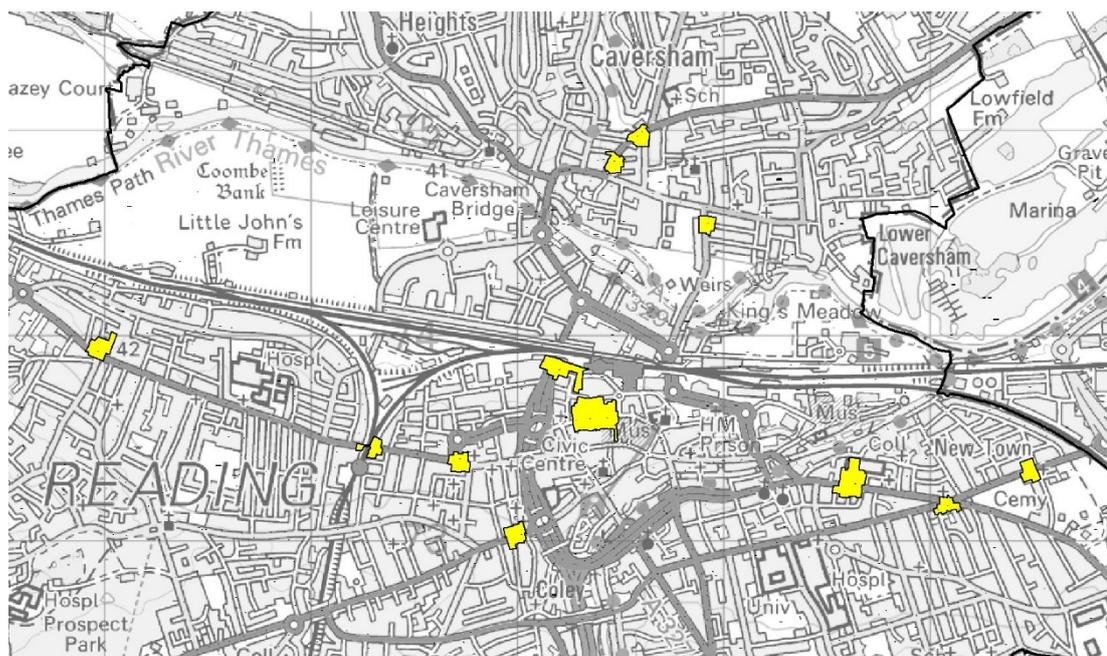
Areas of poorest air quality

- 6.2.29 In section 5.4, data were presented that demonstrated that parts of Reading see exceedances of national objectives for NO₂, and it was further demonstrated why this was an issue that required addressing through an Article 4 direction.
- 6.2.30 An Air Quality Management Area (AQMA) is currently in place covering much of Reading including the whole town centre and the radial transport corridors. An Article 4 direction could potentially use the AQMA boundary. However, as shown on figure 5.6 within section 5.4, there are many locations within the AQMA where NO₂ levels are significantly below national objectives, and it is not therefore considered that use of the AQMA boundary would reflect the geographically smallest location to address the main issue.
- 6.2.31 Instead, it is proposed that the focus should be on those locations with annual mean NO₂ levels in 2019 of 36µg/m³ or more (with levels of 36-39µg/m³ referred to as 'borderline exceedances' in section 5.4). This reduces the area covered into a much smaller number of clusters around the Borough. It is considered that a radius of 50m should be used from the point at which the levels are measured. Air quality can improve relatively quickly the further one moves away from the source of pollutants, and 50m is enough to capture all of the buildings that front onto the

roads that provide the main source of poor air quality. For the purposes of defining an Article 4 direction, this 50m buffer should be best fit to property boundaries, ensuring that the curtilage of all buildings that fall wholly or partly within the buffer are included.

6.2.32 The extent of the resulting areas is shown in figure 6.6. It is clear that, whilst there is some overlap with areas already highlighted, there are also a number of other areas that would be included as a result.

Figure 6.6: 50m buffer of areas of poorest air quality



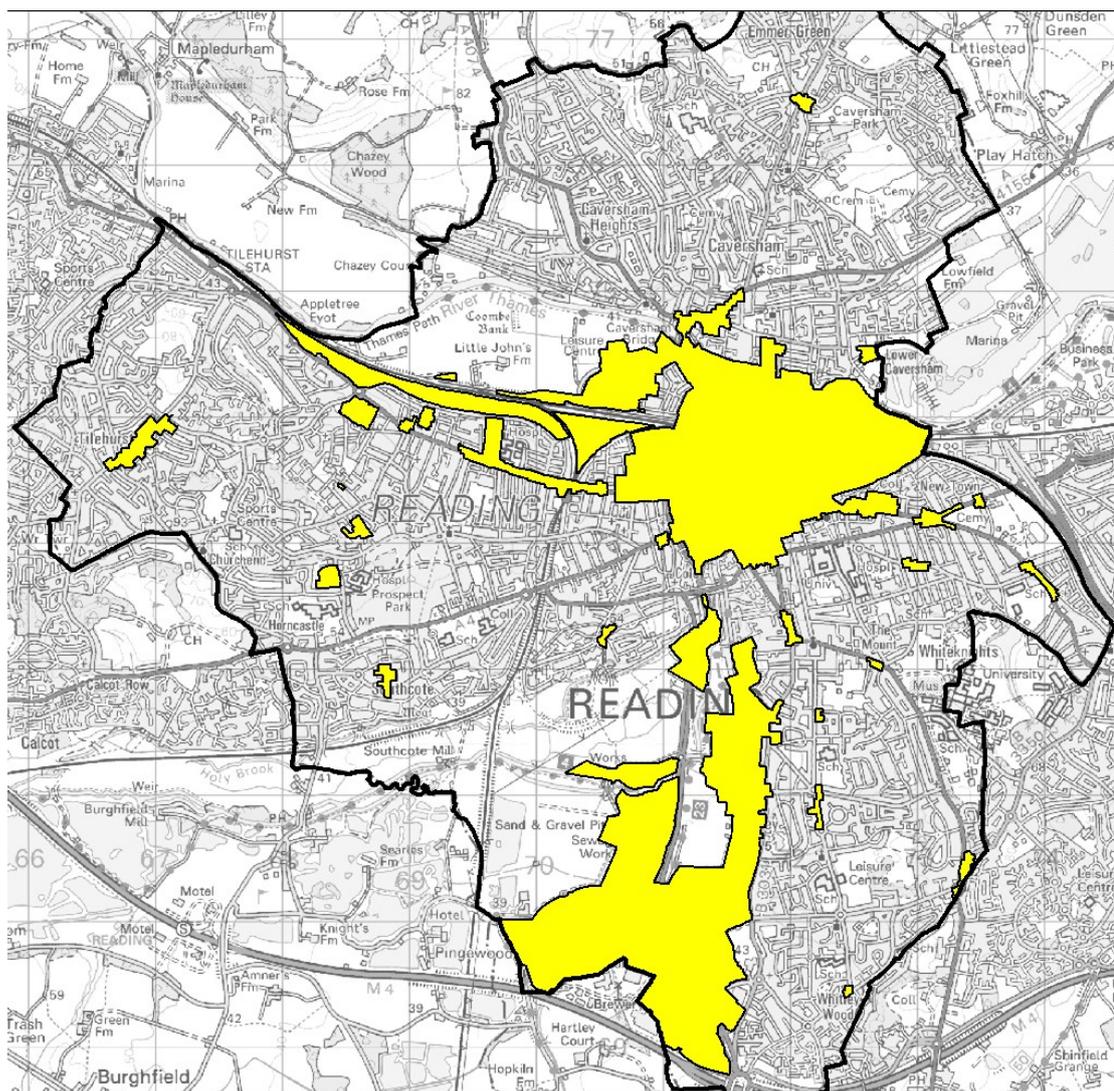
Summary

6.2.33 In summary therefore, the broad coverage should be as follows:

- The whole town centre as defined in the Local Plan;
- The district and local centres as defined in the Local Plan;
- Core employment areas as defined in the Local Plan;
- Other entirely commercial areas; and
- A 50m buffer of the areas of poorest air quality.

6.2.34 This broad area is shown in figure 6.7. The total area covered is 692 hectares, which represents 17% of the area of the Borough, and it therefore represents only a small proportion of the total Borough area.

Figure 6.7: Broad proposed coverage of Article 4 direction



6.3 Summary of overall scope

6.3.1 In summary, as set out in section 6.1, the Article 4 direction should apply to the following forms of PDR:

- Change of use of commercial, business and service use (use class E) to residential (Part 3, class MA);
- Change of use of hot food takeaway, betting office, payday loan shop or launderette to residential (Part 3, class M);
- Change of use of casino or amusement arcade to residential (Part 3, class N);
- Demolition of single, purpose built, detached block of flats or a single, detached office, light industrial or research and development building and its replacement with a detached block of flats or detached house (Part 20, class ZA);
- Up to two additional residential storeys on a detached commercial or mixed-use building (in use for retail, financial and professional, restaurant and café,

office, research and development, light industrial, betting shop, payday loan shop, launderette) (Part 20, class AA); and

- Up to two additional residential storeys on a two or more storey terraced commercial or mixed-use building (see class AA for uses) or one additional storey on a one storey building (Part 20, class AB).

6.3.2 As set out in section 6.2, the broad geographical coverage of the Article 4 direction should include the following areas:

- The entire town centre (town centre core and fringe), as defined in the Local Plan;
- District and local centres, as defined in the Local Plan;
- Core employment areas, as defined in the Local Plan;
- Other almost entirely commercial or retail locations; and
- Areas with the poorest levels of air quality.

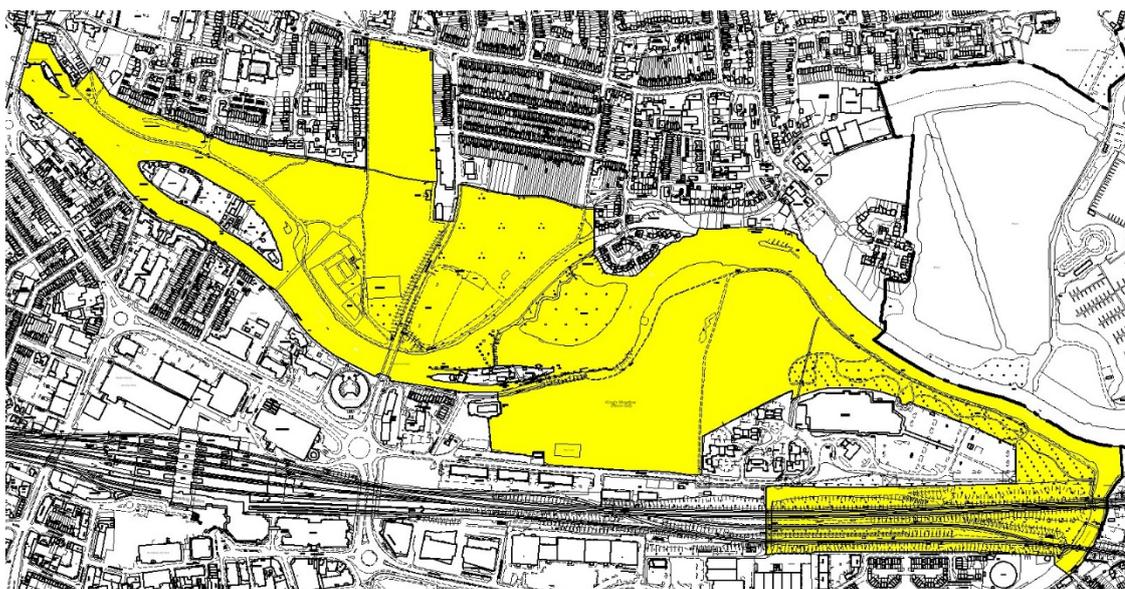
7. Refining the geographical extent

- 7.0.1 In Section 6.2 of this report, the broad geographical extent of the proposed Article 4 direction was discussed, and figure 6.7 shows the full extent of that broad area, based on the discussion in that section. Many of these boundaries accord with relevant designation boundaries from the Local Plan.
- 7.0.2 However, it is important to be mindful of what is set out in paragraph 53 of the NPPF, namely that an Article 4 direction should “*apply to the smallest geographical area possible*”. It is therefore necessary to thoroughly consider whether there are opportunities to reduce the geographical extent of the area whilst still addressing the wholly unacceptable impacts insofar as is possible. This section therefore sets out potential opportunities to reduce the area and assesses the extent to which they should be incorporated.

7.1 Open spaces

- 7.1.1 The town centre boundary as defined in the Local Plan includes substantial areas of open space, in particular around the Thames. This is because one of the objectives of the strategy for the town centre was to improve connections between the town centre and the Thames and the surrounding open spaces and to bring them into the centre. In particular, together Christchurch Meadows, Hills Meadow, View Island, Kings Meadow, the Coal Woodland and the areas of scrub between and around the railway tracks cover approximately 42 hectares within the town centre boundary within which the only buildings that exist are operational buildings associated with the open space and which do not fall within any of the use classes to which the PDR apply.
- 7.1.2 Therefore, this area (together with the area of the River Thames itself) can be removed from the proposed Article 4 direction without any impact on its purpose whatsoever. Figure 7.1 shows the effect of the removal.

Figure 7.1: Area of open space that could be excluded from an Article 4 direction area



7.2 Scheduled monuments

- 7.2.1 All of the relevant PDR specifically state that they do not apply where a site falls within a scheduled monument. There is therefore no need for an Article 4 direction to cover those areas.
- 7.2.2 There are two scheduled monuments in Reading, both of which fall within the town centre - the High Bridge and Reading Abbey. The latter covers by far the largest area, covering the known surviving remains of the abbey, which also includes a number of other current uses including Forbury Gardens, the former Reading Prison, a church, day nursery and residential properties. The extent of the scheduled monuments is shown in figure 7.2. As such, it covers a reasonably significant area of the town centre within which the PDR do not apply, and which can be excluded from the proposed Article 4 area.

Figure 7.2: Scheduled monument locations



7.3 Listed buildings

- 7.3.1 All of the relevant PDR contain exclusions for listed buildings and their curtilage. Therefore, none of the PDR dealt with in this report will apply in those locations. There are over 800 listed buildings in Reading, with the largest concentrations in the town centre. Therefore, in theory it could be possible to reduce the Article 4 direction area so as to not cover listed buildings.
- 7.3.2 However, in practice, reducing the area by excluding listed buildings will be totally impractical. Listed buildings are dotted around the whole town centre and other parts of the Borough, so doing so would result in an extremely complicated Article 4 boundary made up of an area with several hundred 'holes' in it that would make very little sense to anyone viewing it.
- 7.3.3 In addition, buildings can be, and sometimes are, removed from the national list. In the event that this is the case, buildings would be left with no protection under the Article 4 direction, and such buildings, even if they were no longer considered worthy of national protection, would be likely to still be sensitive historic buildings where applications for conversion or additional development would need to be handled through a planning application.
- 7.3.4 It is not therefore proposed to remove specific listed buildings from the proposed Article 4 area.

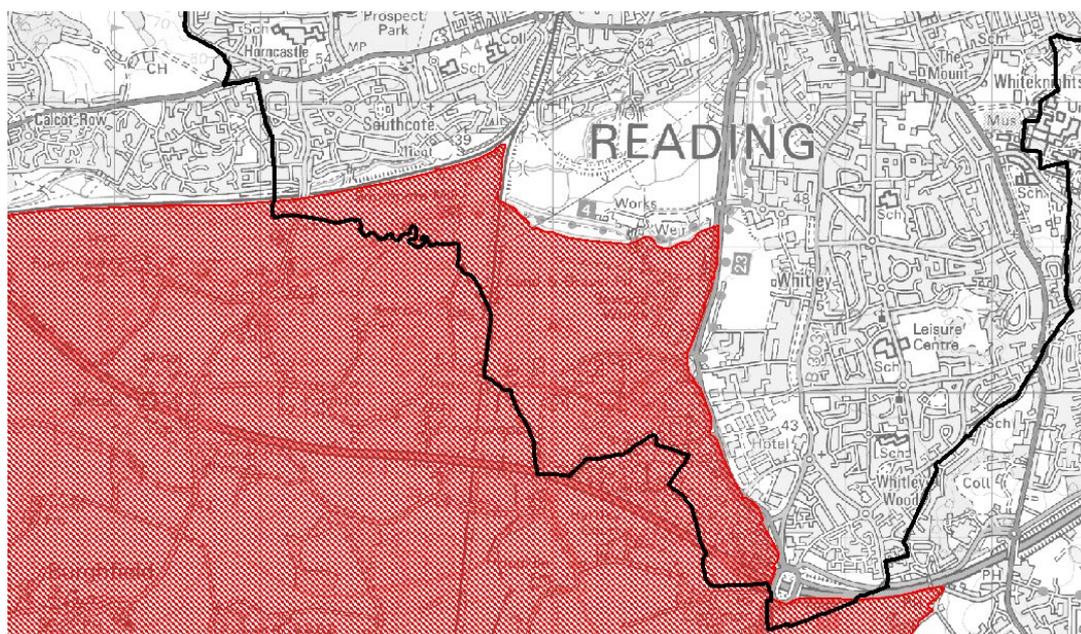
7.4 Conservation areas

- 7.4.1 Almost all of the PDR dealt with in this report do not apply in conservation areas. The only form of PDR which does apply in conservation areas is Part 3, class MA, changes of use from commercial to residential. Within that class of PDR, there is also slightly different application of the right, in that, for ground floor changes of use, the impact on the character or sustainability of the conservation area can be considered through the prior approval process.
- 7.4.2 Therefore, it could be argued that, as forms of PDR have limited application within conservation areas, these could be excluded from the Article 4 direction. However, the only relevant form of PDR that does apply in conservation areas, commercial to residential change of use, is likely to form the vast majority of PDR development in Reading. Within that PDR, the impact on the character or sustainability of the conservation area is a very limited consideration. For instance, whilst it might help to retain some ground floor retail uses where a high street function is intrinsic to the character of the area, it would not involve consideration of the impact on the overall health and function of a centre, or the local economy, and nor would it deal with any of the other areas of harm outlined in this report. Some of the most significant potential noise impacts, for instance, are within conservation areas as the historic town centre spaces are where many outdoor events take place. As conservation areas cover large parts of central Reading, and also parts of other centres such as Oxford Road West and Caversham, excluding these from the Article 4 direction would leave areas of our high streets vulnerable to unacceptable levels of harm.
- 7.4.3 Therefore, it is considered that excluding conservation areas from the proposed Article 4 direction area will not adequately address the unacceptable impacts of PDR.

7.5 Safety hazard zones

- 7.5.1 All of the relevant PDR specifically state that they do not apply in safety hazard zones.
- 7.5.2 The Atomic Weapons Establishment (AWE) has two sites in adjoining West Berkshire, AWE Aldermaston and AWE Burghfield. AWE Burghfield is close to the boundary with Reading Borough. In May 2020, the Detailed Emergency Planning Zone (DEPZ) around AWE Burghfield was significantly expanded in response to changes to legislation, and now extends into parts of Reading. The extent of the DEPZ for AWE Burghfield in Reading is shown in figure 7.3.

Figure 7.3: Extent of Detailed Emergency Planning Zone for AWE Burghfield in Reading Borough



7.5.3 The advice of West Berkshire District Council, the body responsible for maintaining the off-site emergency plan, is that the DEPZ counts as a safety hazard zone in the context of PDR. Appeal decisions in West Berkshire have supported this position. Therefore, none of the areas within the DEPZ need to be covered by an Article 4 direction as the relevant PDR will not apply in those areas. This excludes some substantial areas west of the A33 including Green Park, Reading International Business Park, the Madejski Stadium and surroundings and Reading Gate Retail Park. This reduces the area to be covered by approximately 141 hectares.

7.6 Industrial and warehouse locations

7.6.1 Reading's older employment areas, in particular areas around Basingstoke Road, Portman Road and Richfield Avenue, have significant areas of general industrial (use class B2) and storage and distribution uses (B8), as well as some other associated uses under sui generis, such as vehicle hire. None of the forms of PDR dealt with in this report apply to these uses, so it makes sense to consider whether there is an opportunity to reduce the size of the Article 4 direction area by excluding these locations. However, it is not a straightforward case of excluding such sites, for a number of reasons.

7.6.2 Firstly, given the age of some of these areas, there are frequently no records of what the permitted use of a site is. Many sites currently in employment use simply represent a continuation of historic uses, which may not always have received planning permission in the first place, or may predate the planning system, or may have made use of existing PDR to change use from B2 or B8 to B1. This is particularly significant when one considers the degree to which there is an overlap between B2 (general industrial), to which these PDR do not apply, and Eg(iii) (light industrial), to which some do (particularly Part 3 class MA and Part 20 class ZA).

Distinguishing between the two would require a significant amount of site by site assessment, which is best undertaken through the Certificate of Lawfulness route. For a considerable number of sites, it will not be clear which is the current use.

- 7.6.3 In addition, many sites where there are planning records benefit from open consents to change between B1 (now E), B2 and B8 uses, and this has been a relatively common permission to give where new industrial units have been developed, or older units refurbished, before securing a specific occupier. Again, without a detailed assessment of current uses, it would not be possible to be certain which use is currently taking place in each unit.
- 7.6.4 In addition, within most larger employment sites, there may well be a variety of activities taking place, including general industrial and storage, but also office uses within part of a building or a separate building. This may or may not be ancillary to the main use of a site, and it may or may not therefore be possible to make use of PDR for change of use to residential. In some cases, parts of a previously ancillary office may have been subdivided and/or sub-let as a separate use, and the use of that part of a building as residential could take place, leading to residential mixed in with industrial activities on a single site, a mix of uses which is likely to cause considerable harm.
- 7.6.5 For instance, 42 Portman Road is a site containing a part 1 storey, part 2 storey building with both office and industrial activities. In previous employment land site information it has always been recorded as a single building in primarily industrial use with the office elements as ancillary. Yet in 2020, applicants were able to demonstrate that the two storey part of the building qualified for PDR for conversion of office to residential, and prior approval was issued for a development that would have been highly unlikely to be considered appropriate had a planning application been required.
- 7.6.6 Therefore, the activities in these industrial and warehouse locations are not necessarily as straightforward as they first appear, and excluding areas thought to be in B2 or B8 uses is neither possible nor appropriate.

7.7 Secondary frontages

- 7.7.1 The Reading Borough Local Plan defines centre boundaries, but also defines the most important frontages within those centres. In the case of central Reading, these are the primary frontages identified in policy CR7, whilst for district and local centres these are the key frontages identified in policy RL3. Therefore, it is worth considering whether a proposed Article 4 area can be restricted to the sites which provide primary or key frontage.
- 7.7.2 In the case of central Reading, this would clearly not sufficiently cover the harm that has been identified within the core of the centre. Whilst coverage of the primary frontages only would potentially address the main impacts on high streets, it would not fully resolve the issues of loss of employment, impacts on existing businesses, noise and air quality that are relevant to the central core set out in

[table 6.2](#), and would also not fully resolve the other issues that apply everywhere, including quality, size and affordable housing.

- 7.7.3 In the case of district and local centres, the situation is slightly different because, other than the abovementioned issues that apply in all locations, the impact on high streets is the main form of harm. However, the purpose of identifying key frontage in the Local Plan is specific to the policy wording, and relates to retaining A1 retail and A2 financial and professional use and preventing overconcentration of takeaway uses. As such, the identified key frontages naturally focus on those frontages which have the greatest concentrations of A1 and A2 use. The concerns around PDR do not relate solely to A1 and A2 use because of the introduction of a more general use class E which also covers food and drink, medical facilities, nurseries, indoor sports and recreation and offices, as well as other uses. These uses all play an important role in the diversity of the centres in which they appear, and their loss could well impact on the overall health of the centre, but have not been taken into account in defining the key frontages, often because they are covered by other policies such as RL6 and OU1. Therefore, use of the designated key frontages under RL3 as a means to reduce the area of Article 4 coverage would not cover the likely harm and would not correspond to the reasons for their designation.
- 7.7.4 More generally, Reading's district and local centres are rarely large enough for there to be any distinction between primary and secondary frontages. Some of the centres have less than 20 shop units in total. These centres do not have a core set of primary frontages and a more peripheral set of secondary frontages in the same way as central Reading does. More frequently it is the whole defined centre that contributes to its role in the local community.
- 7.7.5 There is not therefore considered to be scope to reduce the area of coverage in order to exclude more secondary frontages, either in central Reading or in the district and local centres.

7.8 Areas not in relevant uses

- 7.8.1 Within some areas there may be less opportunities to make use of the PDR because the uses to which they apply (mainly falling within the use class E) are not known to be present. Examples might be the site of Reading College (within the defined town centre) or areas of poor air quality which are in mainly residential areas.
- 7.8.2 However, the operation of PDR in Reading over the last eight years has shown that it is not always clear where the opportunities to make use of the PDR exist without any formal determination of what use class a site is in. Many of the smaller PDR developments made use of buildings that had not necessarily been known to be in B1 use prior to applications for prior approval being made, for instance workshops behind or between existing homes. Also, buildings within a larger site such as a college may individually have a different use class, to which PDR might apply. Such

developments may equally cause the types of harm identified in this report, and as such it is not considered that there should be additional exclusions made.

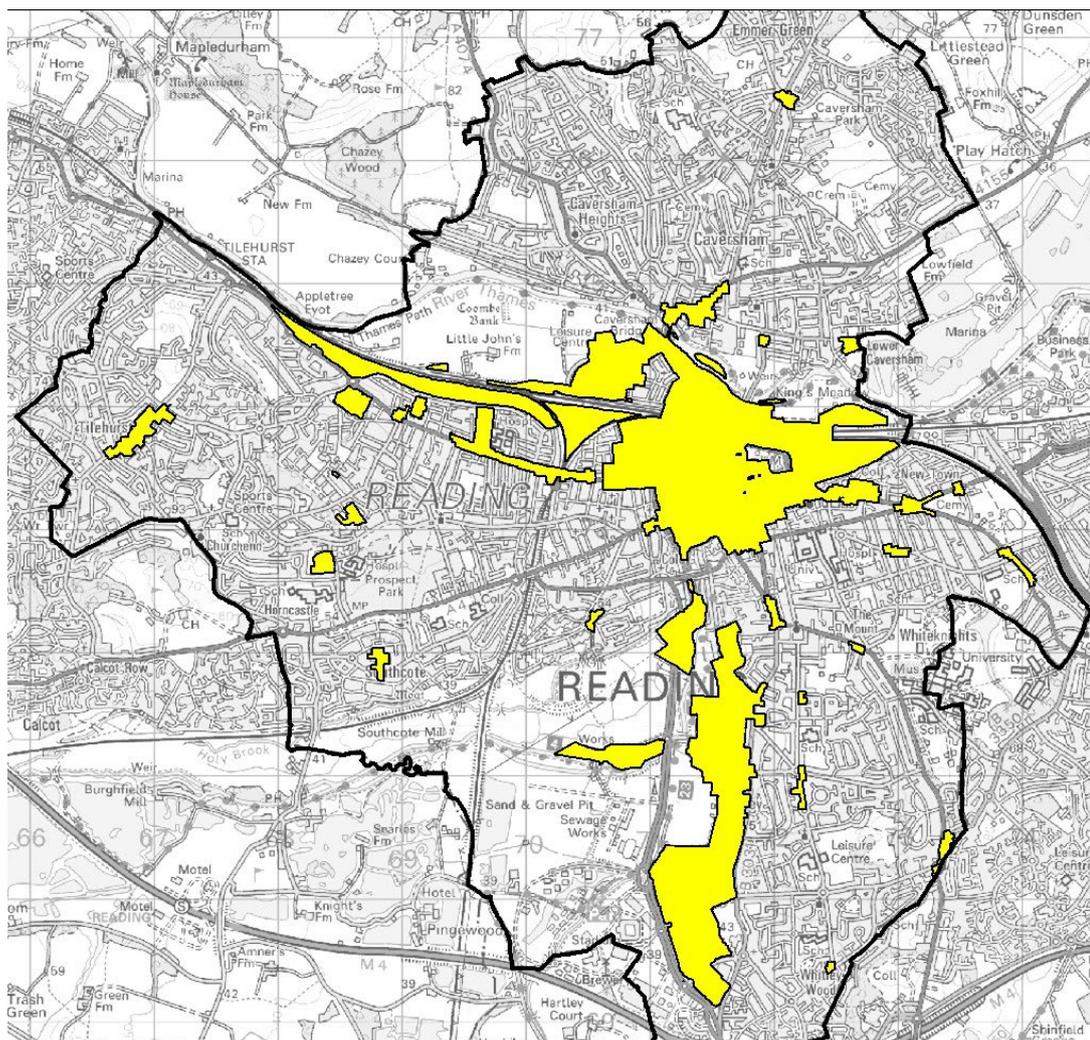
7.9 Summary

7.9.1 The above analysis suggests that the following should be removed from the proposed Article 4 direction area:

- Significant areas of open space;
- Scheduled monuments; and
- Safety hazard zones.

7.9.2 Once the refinements to the proposed Article 4 direction area outlined above are taken into account, the area is reduced in size from 692 ha to 482 ha. This represents a 30% reduction in the size of the proposed area, so it is clear that the reductions are significant. The remaining area, representing what is considered to be the smallest possible area that the direction should cover whilst still addressing the wholly unacceptable adverse impacts, comprises only 12% of the total area of Reading Borough. This area is shown in figure 7.4.

Figure 7.4: Refined proposed coverage of Article 4 direction



8. References

[The Town and Country Planning \(General Permitted Development\) \(England\) Order, 2015 \(as amended\)](#)

[Town and Country Planning Act, 1990](#)

[National Planning Policy Framework \(MHCLG, 2021\)](#)

[Planning Practice Guidance \(MHCLG, last updated 2021\)](#)

[Revitalising High Streets and Town Centres: Statement made on 1 July 2021 \(Secretary of State for Housing, Communities and Local Government\)](#)

[The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, volume 1, 2007 \(DEFRA in partnership with the Scottish Executive, Welsh Assembly Government and Department of the Environment Northern Ireland\)](#)

[Assessing the Impacts of Extending Permitted Development Rights to Office-to-Residential Change of Use in England \(Clifford, B., Fern, J., Liningstone, N., Canelas, P. for RICS, 2018\)](#)

[Reading Borough Local Plan \(Reading Borough Council, adopted 2019\)](#)

[Reading Borough Local Plan Proposals Map \(Reading Borough Council, adopted 2019\)](#)

[Employment, Skills and Training Supplementary Planning Document \(Reading Borough Council, 2013\)](#)

[Local Plan Background Paper \(Reading Borough Council, 2018\)](#)

[Housing and Economic Land Availability Assessment \(Reading Borough Council, 2017\)](#)

[Employment Area Analysis \(Reading Borough Council, 2018\)](#)

[Additional Justification on Policy H3 on Small Site Affordable Housing \(Reading Borough Council, May 2019\)](#)

[2020 Air Quality Annual Status Report \(Reading Borough Council, 2020\)](#)

[Reading Climate Emergency Strategy \(Reading Climate Action Network, 2020\)](#)

[Berkshire \(including South Bucks\) Strategic Housing Market Assessment \(GL Hearn, 2016\)](#)

Central Berkshire Economic Development Needs Assessment (Nathaniel Lichfield and Partners, 2016)

[Western Berkshire Retail and Commercial Leisure Assessment 2016 \(GVA, 2017\)](#)

This page is intentionally left blank

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES

TO:	POLICY COMMITTEE		
DATE:	23 SEPTEMBER 2021		
TITLE:	FLEET REPLACEMENT PROGRAMME		
LEAD COUNCILLOR:	TONY PAGE	PORTFOLIO:	STRATEGIC ENVIRONMENT, PLANNING & TRANSPORT
SERVICE:	TRANSPORTATION	WARDS:	BOROUGHWIDE
OFFICERS	KEVIN GREEN	TEL:	0118 937 3419
JOB TITLE:	FLEET & TRANSPORT MANAGER	E-MAIL:	Kevin.green@reading.gov.uk

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 The purpose of this report is to seek scheme and spend approval for the Vehicle Replacement Programme (VRP) as part of Capital Programme 2021-23. The VRP aims to support the Councils ambition to move towards net zero by 2030 and as one of the biggest sources of green house gas generation that the Council has control over, it is essential that the VRP delivers this change.
- 1.2 This report references the work that the Energy Savings Trust (EST) have done to support the procurement strategy and seeks delegated authority to enter into contracts in accordance with the Public Contracts Regulations 2015 (PCR 2015).

2. RECOMMENDED ACTION

- 2.1 That scheme and spend approval be given for the vehicle replacement programme, as set out in this report, to be funded from the agreed Fleet capital budget set out in the Capital Programme.
- 2.2 That the Executive Director for Economic Growth and Neighbourhood Services in consultation with the Lead Councillor for Strategic Environment, Planning and Transport, and the Assistant Director of Legal & Democratic Services, be authorised to enter into vehicle contracts as required by the vehicle replacement programme, as well as, subject to funding being available within the Fleet capital budget, any additional vehicle purchase(s) required during the term of the replacement programme.

3. POLICY CONTEXT

- 3.1 The Governments policy approach to the transition towards zero emission road transport and a reduction in emissions from convention vehicles is set out in its paper "Road to Zero". The Policy also sets out the Transport Energy Model which assesses the energy consumption, air quality pollutant emissions and

greenhouses gas emissions of a range of road transport fuels and technologies over the period to 2050.

3.2 The information set out in the Policy provides helpful information to inform decisions for changes to the Council's fleet, which was not available in the last Vehicle Replacement Programme plan.

3.3 The Council has clearly set out its aim to achieve net zero by 2030 in its Climate Declaration and changes to the number and type of both Council owned and its grey fleet will have one of the biggest impacts in helping to achieve this ambition. The Corporate Plan 2021-22 theme Healthy Environment ensures services focus on helping to deliver its ambition.

3.4 Both the Climate Change Emergency declaration and Carbon Plan set out a commitment for the Council to green its fleet and the Vehicle Replacement Programme sets out a structure by which this can be delivered.

4. THE PROPOSAL

4.1 In order to meet the Council's ambitions, a planned approach to vehicle replacements needs to be taken which takes into consideration the Government's 'Road to Zero' policy and supporting information, its capital allocation, local service needs, availability of the right fleet replacements and how vehicular fleet reductions can be made.

4.2 The Council has worked with the Energy Savings Trust (EST) to consider the impact of its fleet and viable alternatives and the findings are attached in Appendix 1.

4.3 The programme aims to set out a clear forward plan of replacements with current market cost estimates. In addition to the financial planning benefits:

- it also helps with re-tendering of the maintenance contracts because the contractors have a view of what they would be responsible for;
- it shows the journey towards greening the fleet and
- multi-year contracting of vehicle acquisitions will help to reduce administration and lead times of the procurement and generates fleet standardisation. Grouping of similar vehicles on contracts can result in savings in the procurement of vehicles, vehicle parts, repairer contracts and training of operators. Lead in times are currently up to 1 year, so being able to place orders well in advance is essential.

4.4 The Council owns its fleet and some of these vehicles are reaching the end or are past their reasonable serviceable life, which averages 7 years, therefore are in need of replacement. Although the mileage on these vehicles may be low it is the stop/start nature of the work and the powering of auxiliary equipment that has the greatest impact on the vehicles.

4.5 Due to the aggregate spend of £6.959m for the replacement of these vehicles as shown in Section 10 of this report, it is proposed to access a national framework agreement to procure the vehicles in accordance with PCR 2015.

4.6 The outright purchasing of these vehicles was considered as the best option at this time for the following reasons:

- The larger more expensive vehicles such as the Refuse Collection Vehicles have a high initial cost to purchase but a low residual value at the end of their operational life, meaning it would not qualify as an operational lease.
 - The Councils can currently secure low borrowing rates against the capital required to fund the outright purchase.
 - If services change or the need for the vehicles reduce across its operational life, rather than having to pay out to buy-out of the term left on the operational lease, the Council can sell the vehicle, so bringing money back in to the Council.
- 4.7 It is proposed that the replacement programme be separated into individual lots based upon the required vehicle specifications, and that each lot be individually procured via mini-competition through the most appropriate framework.
- 4.8 Call off contracts will be awarded to the successful bidders in accordance with the process stipulated within the associated framework agreement. Each call-off contract will stipulate a guaranteed minimum order, whilst providing scope for ad-hoc purchases as required. This guarantees the most advantageous economies of scale, whilst reducing the overall cost of procurement through a single procurement process.
- 4.9 The Capital Programme allocation will allow for the replacement of vehicles, however it should be noted that some flexibility of the timing of the spend will be required due to the procurement process or vehicle lead-times. Some of the vehicles will have a year plus lead-time, the order/commitment will be in one year but the actual spend may be in the following year.
- 4.10 It should be noted that the programme does not aim to replace vehicles on a like for like basis. The replacement programme will assess whether the service needs can be met in a different way, such as a reduction in vehicle size or electric bikes, cargo bikes or through an active transport plan. This will need to be assessed against any regulatory restrictions and guidance.
- 4.11 Some vehicle types that are due for replacement are not yet available as electric options, and some of these still have no dates of when this option will come to the market. Officers have investigated the options available and have delayed some vehicle replacements to enable the market to catch up. However, not all the replacements can be delayed as some operations have changed, (e.g. better cross team working requiring extra vehicle seating or different type of bodies) meaning the current vehicles are no longer fit for purpose or have become unreliable or costly to repair.
- 4.12 Whilst electric powered vehicles are a key element for the Council meeting its carbon commitments it does need to be balanced with the vehicles ability to undertake the required workload. Mileage range tends not to be a big issue, due to the low annual mileage of the Councils vehicles, but other issues need to be taken in to consideration such as the use of auxiliary equipment that are powered by the vehicles, such as tippers, tailifts etc.

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 This proposal helps to contribute towards the Councils strategic aims.
 Healthy Environment - the proposals will contribute to the Council's aim of tackling climate change and working towards our goal of a carbon neutral town

by 2030. The proposal will increase sustainability by ‘greening’ the fleet and reducing the reliance on fossil fuels with the introduction of alternative fuels vehicles. Supporting the use of more electric vehicles, lowering carbon and cleaner air for Council vehicles use will also contribute to health benefits for Reading’s residents and visitors.

Further information is set out below in Section 6 and in the attached Fleet Replacement Programme Climate Impact Assessment.

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

- 6.1 The Council declared a climate emergency in February 2019. The Council’s Carbon Plan 2020-25 was developed in the light of this and includes targets to reduce corporate greenhouse gas emissions by 85% by 2025, en route to ‘net zero by 2030’, and to reduce fossil fuel use by 50% by 2025. Both targets are heavily dependent on the transition of the fleet, and particularly the RCV fleet, from fossil fuel to EV. The recommendations in this report will therefore make a significant, positive contribution to the achievement of Carbon Plan targets and the Council’s wider climate change commitments.
- 6.2 Fleet diesel currently represents 16% of RBC’s corporate carbon footprint. As scope for making further carbon reductions from our buildings diminishes, a much larger relative contribution to target carbon savings from fleet will be required over the period 2020-25. Over the past decade, just 3% of RBC’s carbon savings have been achieved via fleet efficiencies, whereas under the new Carbon Plan, savings from fleet make up over a quarter of the target for the period 2020-25, with over half of these arising from electrification of the fleet (the remainder being targeted from fleet rationalisation and other initiatives).
- 6.3 EVs deliver significant carbon savings relative to diesel/petrol due to the lower carbon intensity of grid electricity, which is becoming ‘greener’ all the time as more renewable energy is generated, meaning that while there is still a carbon footprint associated with the manufacture and operation of EVs, they offer zero emissions from the tailpipe. Replacing diesel/petrol vehicles with EVs wherever possible is therefore necessary to achieve Carbon Plan targets as well as delivering wider environmental benefits such as reduced air quality impacts.

6.4 RBC Fleet size, Mileage and Impact.

Sector	Fleet Type	% Size	% Mileage	% Green House Gases
Heavy Goods	Refuse Collection Vehicles	6.6%	4.4%	44.3%
	Rigids > 7.5 tonnes	6.1%	38.4%	11.5%
	Rigids < 7.5 tonnes	10.2%	4.3%	12.3%
Light Commercial	LCV Large	47.4%	43.8%	23.2%
	LCV Small	8.2%	3.8%	1.6%
	LCV Medium	9.2%	3.3%	1.1%
Cars	Car	9.7%	2.0%	3.0%
Plant	Pant	2.6%	1.6%	2.9%

7. COMMUNITY ENGAGEMENT AND INFORMATION

7.1 There is no requirement for community engagement on a procurement of this type.

8. EQUALITY IMPACT ASSESSMENT

8.1 Under the Equality Act 2010, Section 149, the Council must, in the exercise of its functions, 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 has reviewed the scope of the programme as outlined within this report and considers that the proposals have no direct impact on any groups with protected characteristics and therefore no formal equality impact assessment has been undertaken.

9. LEGAL IMPLICATIONS

9.1 The procurement process proposed is in accordance with the Councils Contract Procedure Rules as well as PCR 2015. The replacement programme will be split into various 'Lots', and it is intended to award the associated contracts to the most economically advantageous tender in accordance with the criteria defined within the specification, as governed by the associated framework agreement.

10. FINANCIAL IMPLICATIONS

10.1 Funding of £6.959m has been approved through the capital programme to be spent on the vehicle replacement programme over a 2-year period commencing April 2021. A summary of the replacement programme spend can be found below.

10.2 The financial implications arising from the proposals set out in this report are set out below:

Revenue

	2021/22 £000	2022/23 £000	2023/24 £000
Employee costs (see note1) Other running costs	Nil	Nil	Nil
Capital financings costs			
Expenditure	Nil	Nil	Nil
Income from: Fees and charges (see note2)	Nil	Nil	Nil
Grant funding (specify)			
Other income			
Total Income	Nil	Nil	Nil
Net Cost(+)/saving (-)	Nil	Nil	Nil

10.3 The fleet revenue budget will remain unchanged to meet the vehicle operational costs.

Capital

	2021/22 £000	2022/23 £000	2023/24 £000
Proposed Capital Expenditure	2,931	4,028	Nil
Funded by:			
Capital Receipts/Borrowing	2,931	4,028	Nil

Fleet Replacement programme vehicle type summary		
Year	Vehicle Types	Costs (000)
2021-22	Refuse collection vehicles, 7.5 tonne tippers, Loading shovel, 3.5-2.9 panel vans, Cars (BFfC), Accessible buses (BFfC). Compact road sweepers.	2,931
2022-23	Refuse collection vehicles, Compact road sweepers, 3.5 tonnes tippers. Highway mowers, forklift.	4,028

10.4 Due to the nature of the 2-year replacement programme, the budget may be subject to re-profiling between years at budget setting and subsequent any in-

year underspends will be requested to be carried forward into the following year as part of the outturn report.

11. Value for Money (VFM)

- 11.1 Researching and using the best procurement framework agreements available that best fits within the requirements of the Council, to secure the best available levels of discounts and ensure any further discounts in relation to bulk purchasing are taken up. Such as the YPO & the CCS industry leading procurement frameworks.
- 11.2 Multi-year contracting of vehicle acquisitions will help to reduce administration/lead time of the procurement and generates fleet standardisation. Grouping of similar vehicles on contracts can result in savings in the procurement of vehicles, vehicle parts, repairer contracts and training of operators.

Risk Assessment.

Financial

With interest levels being so low now If the vehicle replacement programme is not taken forward it is likely that the cost to borrow the capital will increase.

Environmental

If the vehicle replacement programme is not delivered, then the Council may not be able to fulfil its strategic objectives or aims to develop Reading as a Green City with a sustainable environment and economy.

11. BACKGROUND PAPERS

Fleet Replacement Programme Climate Impact Assessment (attached)

This page is intentionally left blank

Project / Proposal Name or Reference: <i>Fleet Replacement Programme Climate Impact Assessment</i>	Date: 01-Aug-21	Your Name: Kevin Green
--	---------------------------	----------------------------------

1. IMPACT ON CARBON EMISSIONS				
HOW WILL THIS PROJECT/PROPOSAL AFFECT:	CONSIDERATIONS <i>See guidance below on determining whether negative or positive impacts are High, Medium or Low</i>	IMPACT? <i>Use drop down list</i>	GUIDANCE IF NEGATIVE/NIL RATING HAS BEEN AWARDED	SUMMARISE HOW YOU PLAN TO MANAGE AND REDUCE ANY NEGATIVE IMPACTS
1 ENERGY USE	* More energy will be consumed or emissions generated (by RBC or others) = Negative Impact * No extra energy use is involved or any additional energy use will be met from renewable sources = Nil Impact * Energy use will be reduced or renewable energy sources will replace existing fossil fuel energy = Positive Impact	High Positive	Consider: - Energy efficiency measures - Renewable energy - Reducing demand for energy	Reduce the use of fossil fuels
2 WASTE GENERATION	* More waste will be generated (by RBC or others) = Negative Impact * No waste will be generated = Nil Impact * Less waste will be generated OR amount of waste that is reused/recycled will be increased = Positive Impact	Low Positive	Consider: - Re-usable/recycled goods - Recycling facilities - Reducing/reusing resources	Few vehicle parts in electric vehicles, help to reduce waste
3 USE OF TRANSPORT	* RBC or others will need to travel more OR transport goods/people more often/further = Negative Impact * No extra transport will be necessary = Nil Impact * The need to travel, the use of transport and/or of fossil fuel-based transport will be reduced = Positive Impact	High Positive	Consider: - Use of public transport - Reducing need to travel or transport goods - Alternative fuels/electric vehicles/walking and cycling	Reduction of fossil fuel use switching to electric vehicles

2. IMPACT ON RESILIENCE TO THE EFFECTS OF CLIMATE CHANGE				
HOW WILL THIS PROJECT/PROPOSAL AFFECT THE ABILITY OF READING TO WITHSTAND:	CONSIDERATIONS <i>See guidance below on determining whether negative or positive impacts are High, Medium or Low</i>	IMPACT? <i>Use drop down list</i>	GUIDANCE IF NEGATIVE/NIL RATING HAS BEEN AWARDED	SUMMARISE HOW YOU PLAN TO MANAGE AND REDUCE ANY NEGATIVE IMPACTS
4 HEATWAVES	* Increased exposure of vulnerable people and/or infrastructure to heat stress = Negative Impact * No increase in exposure to heat stress = Nil Impact * Reduced exposure of vulnerable people and/or infrastructure to heat stress = Positive Impact	Nil		Nil
5 DROUGHT	* Water use will increase and/or no provision made for water management = Negative Impact * Levels of water use will not be changed = Nil Impact * Provision made for water management, water resources will be protected = Positive Impact	Nil	Greater need for water management and perhaps reserve supplies	Nil
6 FLOODING	* Levels of surface water run-off will increase, no management of flood risk = Negative Impact * Levels of surface water run-off & flood risk are not affected = Nil Impact * Sustainable drainage measures incorporated, positive steps to reduce & manage flood risk = Positive Impact	Nil	Consider flood defence mechanisms or alternative arrangements (business continuity)	Nil
7 HIGH WINDS / STORMS	* Exposure to higher wind speeds is increased or is not managed = Negative Impact * No change to existing level of exposure to higher wind speeds = Nil Impact * Exposure to higher wind speeds is being actively managed & reduced = Positive Impact	Nil	Greater need for stabilisation measures, robust structures resilient to high winds	Nil
8 DISRUPTION TO SUPPLY CHAINS	* Exposure to supply chain disruption for key goods and services is increased = Negative Impact * No change in exposure to supply chain disruption for key goods and services = Nil Impact * Exposure to supply chain disruption for key goods and services is reduced = Positive Impact	Nil	Source key goods and services locally as it reduces exposure to supply chain disruption and boosts the local economy	No increase in risk

Weighing up the negative and positive impacts of your project, what is the overall rating you are assigning to your project?:

Net High Positive

This overall rating is what you need to include in your report/ budget proposal, together with your explanation given below.

Guidance on Assessing the Degree of Negative and Positive Impacts:

Note: Not all of the considerations/ criteria listed below will necessarily be relevant to your project

Low Impact (L)	* No publicity
	* Relevant risks to the Council or community are Low or none
	* No impact on service or corporate performance
	* No impact on capital assets; or relates to minor capital assets (minor works)
Medium Impact (M)	* Local publicity (good or bad)
	* Relevant risks to the Council or community are Medium
	* Affects delivery of corporate commitments
	* Affects service performance (e.g.: energy use; waste generation, transport use) by more than c.10%
	* Relates to medium-sized capital assets (individual buildings or small projects)
High Impact (H)	* National publicity (good or bad)
	* Relevant risks to the Council or community are Significant or High
	* Affects delivery of regulatory commitments
	* Affects corporate performance (e.g.: energy; waste; transport use) by more than c.10%
	* Relates to major capital assets (larger buildings and infrastructure projects)

In the box below please summarise any relevant policy context, explain how the overall rating has been derived, highlight significant impacts (positive and negative) and explain actions being taken to mitigate negatives and increase positives. This text can be replicated in the 'Environment and Climate Impacts' section of your Committee Report, though

The Council declared a climate emergency in February 2019. The Council's Carbon Plan 2020-25 was developed in the light of this and includes targets to reduce corporate greenhouse gas emissions by 85% by 2025, en route to 'net zero by 2030', and to reduce fossil fuel use by 50% by 2025. Both targets are heavily dependent on the transition of the fleet, and particularly the RCV fleet, from fossil fuel to EV.

This page is intentionally left blank

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF FINANCE

TO:	POLICY COMMITTEE		
DATE:	23 SEPTEMBER 2021		
TITLE:	PROPOSED CHANGES: LOCAL COUNCIL TAX REDUCTION SCHEME		
LEAD COUNCILLOR:	COUNCILLOR BROCK	PORTFOLIO:	
SERVICE:	FINANCE	WARDS:	BOROUGHWIDE
LEAD OFFICER:	SAMANTHA WILLS	TEL:	0118 937 2711
JOB TITLE:	REVENUES & BENEFITS MANAGER	E-MAIL:	SAMANTHA.WILLS@READING .GOV.UK

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 This report sets out a range of options to make amendments to the Local Council Tax Reduction Scheme for the 2022/23 financial year. These options would reduce administrative processes for both customers and staff and provide an increased level of support.
- 1.2 A statutory consultation period is required for changes to the Local Council Tax Reduction Scheme and, subject to member approval; it is proposed to consult on the proposed options for a period of eight weeks. The consultation timetable is set out below.
- 1.3 An equality impact assessment for the proposals has been carried out and is set out in Appendix One.
- 1.4 A table of neighbouring local authorities scheme characteristics is set out in Appendix Two.

2. RECOMMENDED ACTION

That Policy Committee:

- 2.1 Consider the options to amend the Local Council Tax Reduction Scheme for implementation from 1 April 2022
- 2.2 Agree the five proposals set out in para's 4.2 to 4.6 for consultation, in accordance with the timetable set out in para 7.2 in the body of the report.

3. POLICY CONTEXT

- 3.1 Council Tax Benefit (CTB), the national system of support for Council Tax bills, was localised and replaced in England by what is now known as Local Council Tax Reduction Scheme (referred to as LCTRS) in April 2013. Such schemes reduce, sometimes to zero dependent on local decision making, the amount of Council Tax which a household has to pay.

While Scotland and Wales each brought in nationwide schemes to replace CTB, English councils were left to devise their own schemes for working-age residents. The full protection for pensioners provided by CTB remained a requirement of each local scheme.

Each year there is a requirement for the local authority to review the scheme and if amendments are proposed there must be a consultation process and responses duly considered before applying the changes. This report sets out a range of options to amend the existing scheme for the 2022/23 financial year.

3.2 Changes to Local Council Tax Reduction schemes in April 2021/22

There are now only 44 out of 309 English local authorities who have neither introduced a minimum payment, a band cap or a banded scheme. These schemes are those that are closest to CTB.

The three common scheme changes are defined follows:

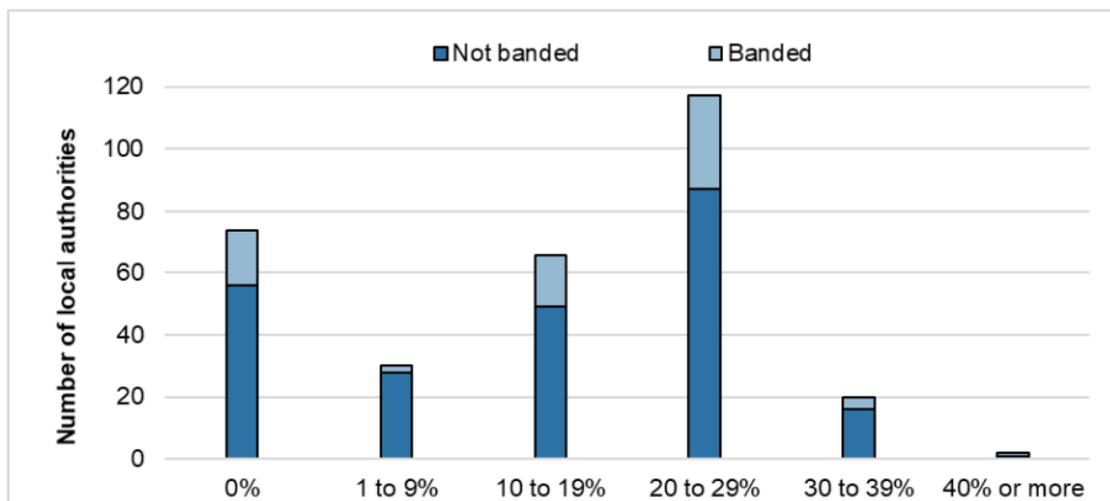
- The introduction of a minimum payment which refers to the proportion of Council Tax liability that all working-age residents are required to pay, regardless of income. If no minimum payment exists, claimants may be entitled to ‘full’ support, equal to the value of their Council tax liability, leaving them with nothing to pay.
- The introduction of a band cap which involves limiting the amount of support for those in higher banded properties so that it does not exceed the amount provided to those in lower value properties.
- The introduction of income banded schemes. These schemes assess the income of claimants and, depending on the income band a claimant falls in, they have to pay a certain proportion of their Council Tax bill.

In 2021/22, of the 309 Local Authorities, relatively few made changes to their schemes, which are detailed as follows:

Scheme changes in 21/22	No. of Local Authorities	Comments
Change to minimum payment or band cap	11	Four schemes became less generous in some way, whilst five lowered their minimum payment. Three of these introduced an income banded scheme and removed the minimum payment for claimants in the first of these bands.
Introduced Income banded schemes	9	
Banded schemes that have increased minimum payment	13	
Banded schemes that have reduced (or removed completely) minimum payment	22	

Although the number of schemes with no minimum payment (0%) has increased recently, the most common minimum payment group remains (as in April 2018), 20 to 29%, with 117 councils in this group. There are 22 councils with a minimum payment of 30% or more as demonstrated in Table 1.

Table 1: Local authority minimum payments by group in 2021/22:



Since localisation there has been a great deal of variation across England. In some local authorities, low-income households continue to be exempt from paying Council Tax whilst in other local authorities they are required to pay up to 50% of their bill.

Table 2 shows the average minimum Council Tax payments for couples claiming LCTRS for local authorities with a 20%, 25% and 30% minimum payment and the three local authorities with the highest minimum payments - Redbridge, Mid Sussex and North Lincolnshire.

Table 2: Local authorities CTRS Minimum Payments

Local Authority (LA)	Minimum payment (MP)	Minimum annual payment - Couple
Average of LAs with 20% MP	20%	£309
Average of LAs with 25% MP	25%	£385
Average of LAs with 30% MP	30%	£436
Redbridge	38%	£621
Mid Sussex	40%	£695
North Lincolnshire	50%	£679

The Council's scheme currently compares as follows based on a Band D property charge:

Local Authority (LA)	Minimum payment (MP)	Minimum annual payment - Couple
Reading BC	35%	£727

Current support levels increase the overall Council Tax collectable. However, the revenue generated can place customers in hardship and increase resource required to recover the debt.

4. THE PROPOSAL

4.1 Current Position:

The Council's current Local Council Tax Reduction Scheme for 2021/22 has the following key characteristics:

Persons of Working Age

Persons of “Working Age”, are required to make a minimum contribution of at least 35% towards their Council Tax liability. Essentially, the maximum reduction available to persons of “Working Age” is based on 65% of their Council Tax liability.

Where a person of “Working Age” is entitled to a reduction of £5 per month, (equivalent to £1.15 p/w) or less, they not entitled to any Council Tax Support.

The maximum amount of reduction that can be awarded is based upon the Council Tax charge for a Band D property, properties in bands above band D are automatically restricted to the relief at the Band D level.

There are no backdating provisions within our current scheme.

There are no second adult rebate provisions within our scheme for persons of “Working Age”.

Where a person is in receipt of a monthly Universal Credit payment, the payment will be treated as part of their overall income in the calculation of their support assessment.

There is an upper capital limit of £3,000, which means that people with £3,000 or more will not qualify for a reduction for the remainder of the billing year, irrespective of whether the capital is subsequently spent.

Persons of Pension Age

Persons of “Pension Age” are largely protected by the Government’s prescribed default scheme and continue to have their entitlement to a reduction calculated on 100% of their Council Tax liability.

Persons of “Pension Age” are entitled to have their assessment based on their Council Tax liability for the actual band of property that they are occupying. In other words, a person of “Pension Age” will not have their reduction calculation capped to a Band D property, if they happen to occupy a property in Bands E, F, G or H.

Non-dependant deductions

Deductions are made from an applicant’s support for any persons aged over 18 who normally live with them, or for whom they do not receive Child Benefit, subject to certain exclusions. Non-dependants are typically grown up children or elderly relatives.

There are two rates of Non-Dependant Deduction:

A non-dependant deduction of £10.00 per week applies for non-dependants who are not engaged in remunerative work or working less than 16 hours per week, and/or have gross earnings less than £207.70 per week;

A non-dependant deduction of £15.00 per week applies for any non- dependants engaged in remunerative work with gross weekly earnings of £207.70 per week and above

There are certain categories that attract no deduction, and these remain in place for both working age and pension age customers.

4.2 Proposed changes for 2022/23:

Proposal One - Persons of Working Age

For 2022/2023, persons of “Working Age”, would be required to make a minimum contribution of between 25% and 30% towards their Council Tax liability. Essentially, the maximum reduction available to persons of “Working Age” would be between 70% and 75% of their Council Tax liability. This option provides an increase in support from the current 65% maximum.

The range indicated allows for consideration of caseload changes between now and Tax Base setting in January 2022. The actual amount of reduction would be agreed as part of the budget setting process, but by consulting on a range of support levels, caseload implications can be better balanced against support aspirations.

Financial implications at para 10.1 highlight the cost variances between the 2 options.

4.3 Proposal Two - Persons of Working Age

Remove “Working Age” Council Tax Support minimum of £5 per month, (equivalent to £1.15 p/w) or less.

Removing minimum support levels would avoid LCTRS claims ending thus reducing the number of re-applications and ensures customers receive the support they are entitled no matter how small.

The number of claims during 2020/21 that failed to qualify, as would have been entitled to support of less than £1.15 per week was 200. Whilst it is dependent on customers

circumstances changing for entitlement to increase above the threshold, it would be more economical to leave the claim live and in payment to avoid the potential need for both customers and staff to re-process a full claim.

We are unable to ascertain the number of claimants that subsequently re-applied as a result of a change in circumstances and received support.

4.4 Proposal Three - Persons of Working Age

Increase the upper capital limit from £3,000 to £6,000, which means that people with £6,000 or more will not qualify for a reduction.

Remove the restriction to submit a new claim during the remainder of the billing year where capital is subsequently spent.

The change will reduce administration as Department of Work and Pensions data currently available only provides capital data where it exceeds £6,000 in line with the Housing Benefit & Universal Credit Regulations.

Whilst we cannot ascertain with certainty the number of new applicants this change will support. We do however know when the reduced capital limit from £6,000 to £3,000 was introduced for the financial year 2018/19, 121 claims were cancelled as a result.

Financial modelling is based on the number of claim cancellations at the start of 2018/19 and an average award of £945.

4.5 Proposal Four - Persons of Working Age

Allow a maximum of one month backdating provision within the scheme. A working age claimant must have a good cause for their late claim throughout the period for which backdating is requested. This change will align with the current Housing Benefit & Universal Credit Regulations.

Whilst we cannot ascertain with certainty the number of new applicants this change will support. We do however know during the financial year 2020/21 that 15 applicants were entitled to up to one month backdating on their Housing Benefit claim. The cost of this change would be negligible.

4.6 Proposal Five - Non-dependant deductions

Set a standard rate of £10 Non-Dependant Deduction to apply for non-dependants who are both engaged and not engaged in remunerative work.

There are certain categories that attract no deduction, and these remain in place for both working age and pension age customers.

The proposed change would provide an increased level of support for those currently with a higher deduction. The change would impact approximately 50 current support recipients.

In addition to providing a greater level of support, the change would reduce administration for both staff and customers. There are currently just over 300 live claims in receipt of either a higher or lower non-dependant deduction, for each claim proof of the non-dependant income is required. This would be either 5 weekly payslips, 2 monthly or 3 fortnightly and details of any other income, plus DWP searches of benefit entitlement. This administration process would be removed entirely with the proposed change.

The cost of this change would be approximately £13,000 based on 50 claims at an increased support level of £5 per week.

5. **CONTRIBUTION TO STRATEGIC AIMS**

- 5.1 This proposal will support the Council's vision and contribute to the following Corporate Plan priorities:

Thriving Communities - The proposed changes in support contribute to the well-being of local people most in need by increasing the level of financial support available and reducing the claims procedures they would otherwise have to follow.

6. **ENVIRONMENTAL AND CLIMATE IMPLICATIONS**

- 6.1 None to record, this proposal provides financial support and changes to the administration of the Local Council Tax Reduction Scheme

7. **COMMUNITY ENGAGEMENT AND INFORMATION**

- 7.1 There is a statutory requirement to carry out consultation on any changes to a Local Council Tax Reduction Scheme. The guidance recommends that public consultation should be carried out as early as possible to ensure sufficient time for the feedback to be gathered, impacts to be understood, and feedback to inform the scheme.

Although Government’s code of practice on consultation states that whilst normally 12 weeks is appropriate, billing authorities may wish to consider the appropriate length of their consultation depending on the impact of their proposals and the ability to complete the consultation exercise within budgetary timetables.

The code of practice indicates that where timing is restricted, for example due to having to meet a fixed timetable such as a budget cycle, there may be good reason for a shorter consultation, and any documentation should be clear about the reasons for the shorter timeline.

It is proposed to carry out an on-line consultation over an 8-week period. The proposed timeline is set out in the table below, to allow for consideration of feedback and revised modelling ahead of the Council’s Tax Base setting. Alternative formats of the consultation can be made available on request.

We will specifically consult key stakeholders: Residents, Businesses, Voluntary Sector Organisations, Advice and Support Agencies, Private Landlords, Housing Associations and other stakeholders, including our preceptors.

7.2 Proposed timetable:

Consult with key stakeholders	27/09/21 - 21/11/21
Review Consultation Feedback	w/c 22/11/21
Re-Model LCTRS proposals based on revised caseloads	December
Propose final scheme to Policy following outcome of consultation	17/01/2022
Council Meeting - Council decides 2022/23 Scheme following consultation as part of the tax base setting report	25/01/2022
Council Meeting - Council Tax Setting	22/02/2022
Bills issued reflecting revised LCTRS Scheme	March 2022
Formally Implement Change	01/04/2022

8. EQUALITY IMPACT ASSESSMENT

8.1 A Equality Impact Assessment is set out at Appendix One.

All of the current options impact positively on all customers of working age currently in receipt of Council Tax Support.

Pensioners remain unaffected by these proposals.

9. LEGAL IMPLICATIONS

9.1 In 2013 the Government Abolished Council Tax Benefit and replaced it with a requirement for Local Authorities to set their own Council Tax Reduction Scheme. Authorities must do this by 31 January each year or the scheme they had in the year before continues.

The proposed amendments to the Council’s scheme as outlined above are proposed in accordance with Section 13A (1) (a) of the Local Government Finance Act 1992 (as amended by section 10 of the Local Government Finance Act 2012).

The proposed changes to the Council's LCTR Scheme would apply from 1st April 2022.

- 9.2 The decision about the scheme is linked to the decision that is reserved to Council to set the Council's Tax Base for Council Tax setting purposes, as effectively reducing council tax support increases the tax base, so more money is collected for each £1 of council tax that is set.

10. FINANCIAL IMPLICATIONS

- 10.1 £650,000 is earmarked in the MTFS to provide additional support to LCTRS Claimants from 2022/23.

Current LCTRS expenditure per modelling tool: £8,220,624

Estimated LCTRS expenditure per modelling tool based on current caseload:

Cost Modelling based on 1.99% increase and 25% minimum contribution:	
Estimated LCTRS expenditure if Council Tax 22/23 total increase 1.99%	£8,446,608
Estimated LCTRS expenditure with 25% min. contribution	£9,160,295
Estimated LCTRS expenditure with 25% min. contribution & £10 Non-Dependant deduction	£9,173,193
Remove Council Tax Support minimum of £1.15 per week	£12,000
Increase capital limit £6000	£114,000
Estimated LCTRS expenditure including all proposals	£9,299,193
Funding required to support 5 proposals	£852,585

Cost Modelling based on 1.99% increase and 30% minimum contribution:	
Estimated LCTRS expenditure if Council Tax 22/23 total increase 1.99%	£8,446,608
Estimated LCTRS expenditure with 30% min. contribution	£8,803,539
Estimated LCTRS expenditure with 30% min. contribution & £10 Non-Dependant deduction	£8,816,318
Remove Council Tax Support minimum of £1.15 per week	£12,000
Increase capital limit £6000	£114,000
Estimated LCTRS expenditure including all proposals	£8,942,318
Funding required to support 5 proposals	£495,710

Cost Modelling based on 2.99% increase and 25% minimum contribution:	
Estimated LCTRS expenditure if Council Tax 22/23 total increase 2.99%	£8,538,702
Estimated LCTRS expenditure with 25% min. contribution	£9,260,089
Estimated LCTRS expenditure with 25% min. contribution & £10 Non-Dependant deduction	£9,273,016
Remove Council Tax Support minimum of £1.15 per week	£12,000
Increase capital limit £6000	£114,000
Estimated LCTRS expenditure including all proposals	£9,399,016
Funding required to support 5 proposals	£860,314

Cost Modelling based on 2.99% increase and 30% minimum contribution:	
Estimated LCTRS expenditure if Council Tax 22/23 total increase 2.99%	£8,538,702
Estimated LCTRS expenditure with 30% min. contribution	£8,899,501
Estimated LCTRS expenditure with 30% min. contribution & £10 Non-Dependant deduction	£8,912,294
Remove Council Tax Support minimum of £1.15 per week	£12,000
Increase capital limit £6000	£114,000
Estimated LCTRS expenditure including all proposals	£9,038,294
Funding required to support 5 proposals	£499,592

Assumptions made:

- 1.99% increase in liability following budget setting for 2022/23 or
- 2.99% increase in liability if Adult Social Care precept is applied
- Caseload remains as at August 2021

The increase to Council Tax foregone as a result of changes would be split between the Council and the two preceptors. The following tables demonstrate the split, dependant on whether the general council tax rise is 1.99% or 2.99% and whether the minimum contribution is 25% or 30%:

Cost Modelling based on 1.99% increase and 25% minimum contribution:		
RBC	85.63%	£730,069
Police	10.95%	£93,358
Fire	3.42%	£29,158
Total		£852,585

Cost Modelling based on 1.99% increase and 30% minimum contribution:		
RBC	85.63%	£424,476
Police	10.95%	£54,280
Fire	3.42%	£16,953
Total		£495,710

Cost Modelling based on 2.99% increase and 25% minimum contribution:		
RBC	85.63%	£736,687
Police	10.95%	£94,204
Fire	3.42%	£29,423
Total		£860,314

Cost Modelling based on 2.99% increase and 30% minimum contribution:		
RBC	85.63%	£427,801
Police	10.95%	£54,705
Fire	3.42%	£17,086
Total		£499,592

11. BACKGROUND PAPERS

11.1 [Review of Council Tax Reduction schemes in England in 2021/22 \(npi.org.uk\)](https://npi.org.uk)

APPENDIX TWO - BERKSHIRE DATA COMPARISON

Local Authority	21/22 Band D Charge	Capital Limit	Band Restriction	Maximum Support
Reading	£2,076.83	£3,000	Band D	65.00%
West Berkshire	£1,942.98	£6,000	Band C	70.00%
Wokingham	£1,988.82	£4,000	Band D	78.00%
Bracknell Forest	£1,796.08	£16,000 (taper from £6k to £16k)	None	80.00%
Slough	£1,790.53	£16,000	Band C	80.00%
Windsor & Maidenhead	£1,465.30	£16,000	None	80.00%

This page is intentionally left blank

Provide basic detail

PROPOSED CHANGES TO THE LOCAL COUNCIL TAX REDUCTION SCHEME

Directorate: Directorate of Resources

Service: Finance

Name and job title of person doing the assessment

Name: Samantha Wills

Job Title: Revenues & Benefits Manager

Date of assessment: 09/09/2021

Scope your proposal

What is the aim of your policy or new service/what changes are you proposing?

To consider the options to amend the Local Council Tax Reduction Scheme for implementation from 1 April 2022. The following 5 proposals have been identified for consultation:

Proposal 1 - Provide an increase in support from the current 65% maximum to a value between 70% & 75% maximum, dependant on caseload change and affordability at tax base setting;

Proposal 2 - Remove "Working Age" Council Tax Support minimum of £5 per month, (equivalent to £1.15 p/w) or less;

Proposal 3 - Increase the upper capital limit from £3,000 to £6,000;

Proposal 4 - Allow a maximum of one month backdating provision and;

Proposal 5 - Set a standard rate of £10 Non-Dependant Deduction to apply for non-dependants irrespective of whether engaged and not engaged in remunerative work.

Who will benefit from this proposal and how?

Everyone who currently receives or becomes eligible for support through the Local Council Tax Reduction Scheme, except pensioners, will be affected in a positive way by these changes.

What outcomes does the change aim to achieve and for whom?

Increased levels of support for those who currently receive or become eligible for a Local Council Tax Reduction, except pensioners. It will reduce the risk of customers falling into arrears and suffering financial hardship.

In addition, a reduction in administration processes for both customer and staff.

Who are the main stakeholders and what do they want?

74,500 Council Tax payers including 8,000 in receipt of Council Tax Support

Preceptors

Special interest organisations such as Citizens Advice, Welfare Rights, Housing Associations, National Federation of Landlords

Organisations representing vulnerable groups

Assess whether an EIA is Relevant

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

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

No

Pensioners will be protected from any changes as prescribed, they cannot be asked to contribute any additional amount therefore their Council Tax Support entitlement remains the same.

For households of working age, these customers are positively affected by the changes.

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

No

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

If No you **MUST** complete this statement

An Equality Impact Assessment is not relevant because:

The proposals made affect all groups equally, the proposals positively impact on all who currently receive or become eligible for support through the Local Council Tax Reduction Scheme

Signed-completing officer

Samantha Wills

9/9/21

Signed-Lead Officer

This page is intentionally left blank

READING BOROUGH COUNCIL

REPORT BY DEPUTY CHIEF EXECUTIVE

TO:	POLICY COMMITTEE		
DATE:	23 SEPTEMBER 2021		
TITLE:	ACCESSIBLE INFORMATION AND COMMUNICATIONS POLICY		
LEAD COUNCILLOR:	CLLR MCEWAN	PORTFOLIO:	CORPORATE AND CONSUMER SERVICES
SERVICE:	POLICY	WARDS:	BOROUGHWIDE
LEAD OFFICER:	CLARE MUIR	TEL:	0118 9372119/72119
JOB TITLE:	POLICY AND VOLUNTARY SECTOR MANAGER	E-MAIL:	clare.muir@reading.gov.uk

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

1.1 This report presents a draft Accessible Information and Communications Policy to support the Customer Experience Strategy going forward.

1.2 The Policy adopts the best practice set out in the Web Content Accessibility Guidelines 2.1 Level AA and seeks to work towards full compliance with the NHS Accessible Information Standard across all services.

1.3 The Policy is provided at Appendix 1 of the report and a high-level implementation Plan is set out in Appendix 3

1.4 Appendices:

1.4.1 Appendix 1 - Accessible Information and Communications Policy

1.4.2 Appendix 2 - Equality Impact Assessment

1.4.3 Appendix 3 - Implementation Plan

2. RECOMMENDED ACTION

2.1 That the draft Accessible Information and Communications Policy attached at Appendix 1 is approved.

3. POLICY CONTEXT

3.1 This policy supports implementation of Reading Borough Council's Customer Experience Strategy 2020-2024, approved by Policy Committee in January 2020. The Strategy covers all of RBC's services including both internal and external communication and reflects the Council's commitment to equality and customer service excellence by presenting excellent practice. It makes a commitment that every interaction will be a positive experience: better, faster, simpler. It recognises that some people might need extra support to access services, and we must ensure it is available. It pledges to look at our services and processes through the lens of the customer to ensure services are accessible.

4. THE PROPOSAL

4.1 Current Position

4.1.1 An Accessibility workstream was formed as part of the delivery of the Customer Experience Strategy. A key component was the development of an Accessible Information and Communications Policy. This was to provide a clear, consistent, and fair approach to the way we communicate and provide information particularly considering:

- People who are disabled
- People who do not speak or read English at all or very well
- People with low literacy
- People in digital poverty or who don't have access to IT

4.1.2 This applies to both residents and staff and applies to all types of communication.

4.1.3 As part of the development of the Policy, a Customer Needs Analysis (Appendix A of the Policy) and a best practice review was undertaken. This established that there is a considerable legal framework of best practice in relation to accessible and inclusive information. This stems from the Equality Act 2010 and is further set out in the Web Content Accessibility Guidelines (WCAG) - an international standard for producing a universal approach to web content accessibility - and the NHS Accessible Information Standard.

4.1.4 A gap analysis of the Council's current practice against best practice was undertaken. This is set out in Appendix B of the Policy and provides direction for the implementation plan set out in Appendix 3 of this report. The gap analysis identified many areas of best practice already in place including:

- the Council's provision of a comprehensive Interpretation and Translation Service
- involvement of target audiences through Older People's Working group, Physical Disability and Sensory Needs working group, Access and Disabilities Working Group, Covid Public Health work, and through the Neighbourhood team, and Playgrounds team in DEGNS
- testing of the Council's website by people with a wide range of disabilities, and accreditation of the website from the Shaw Trust.
- the online [Reading Services Guide](#) for Adult Care and Children's Services users which provides a comprehensive directory of statutory and voluntary and community services for Reading residents
- a 'Communicate Information' section on the Council's intranet with a checklist on information on website accessibility, how to book interpretation and interpretation, style guides, how to make consultations accessible.

4.1.5 It noted that currently the Reading Borough Council website is partially conformant with baseline Level AA tier of the WCAG 2.1. The website Accessibility Statement identifies that some PDF documents, downloadable documents, videos and tables do not meet accessibility standards and general staff awareness of what is required and how to meet this is low. Use of third-party websites and portals is common as is distribution of third-party communications. These are not necessarily compliant with WCAG 2.1 Level AA.

4.1.6 The gap analysis highlighted that consistency of practice could be improved by rolling out, across all services, the best practice from the NHS Accessible Information Standard being applied in Adult Social Care, and the Web Content Accessibility Guidelines; and promoting best practice through improved staff awareness and training on accessibility.

4.2 Proposal

4.2.1 The Policy proposes 10 Principles and Standards:

1. **Pursue full compliance with the WCAG 2.1 Level AA standard for web accessibility** and communicate inclusion and accessibility principles and methodology widely across the staff base. This will apply to our own and outsourced communications, third-party communications provided via the Council and to the use of third-party communication vehicles e.g. websites and portals.
2. **Work towards full compliance with the NHS Accessible Information Standard across all services** for customers with disability, impairment or sensory loss. The roll-out of this will be built into our Customer Experience programme.
3. **Present positive images** of disabled people and ethnic diversity on our website and publications to encourage customers to use our services, to help them identify with the message and feel that they can trust the organisation.
4. **Involve target audiences** through needs analysis and co-production where appropriate to understand what communication methods are effective for them
5. **Create a designated web page for disabled people** to make it easier for disabled people to access information that is most important and relevant to them.
6. **Telephone hotline to support all areas of the website** where people need assistance to find what they are looking for, complete a transaction, report a problem with accessibility. This number will be promoted on the accessibility web pages above and will be answered by staff with additional training about accessibility.
7. **Design accessibility into information and communication** using clear, easy to read language and simple design.
8. **Meet accessible communications needs on request** for those who need additional support e.g. via telephone or face to face appointments, interpretation and translation, alternative formats and multiple channels on request, within a standard timescale, with clear information to customers and staff on standards and how to make a request.
9. **Ensure the additional needs of customers are considered when designing communications** and that it is based on data and evidence of need and demand
10. **Staff are informed and trained** on accessible information and communication.

4.3 Implementation

- 4.3.1 The high-level implementation plan is set out in Appendix 3. Rolling out the best practice from the NHS Accessible Information Standard across all services will need to take place in stages. An audit and review compliance with the NHS Accessible Information Standard is currently underway in Adult Social Care and will be completed by December. This will provide learning for the approach to whole Council adoption of the standard, in particular in relation to recording service user communication preferences; and staff training and guidance.
- 4.3.2 Improvements to accessibility of the website will be incorporated into the Customer Experience Programme work on the website.

5. CONTRIBUTION TO STRATEGIC AIMS

5.1 The proposals support and underpin how we deliver against all Corporate Plan priorities:

Healthy Environment
Thriving Community
Inclusive Economy

5.2 The decision contributes to the Council's strategic aims to promote equality, social inclusion.

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

6.1 This policy is assessed as Net Nil impact. Provision of information or enabling communication through hardcopy written format is necessary for some people to be able to access services and the information the Council provides. The impact will be minimised by providing hardcopy written format on request and using data and evidence of need and demand to inform decisions about when to provide this format in advance.

7. COMMUNITY ENGAGEMENT AND INFORMATION

7.1 Section 138 of the Local Government and Public Involvement in Health Act 2007 places a duty on local authorities to involve local representatives when carrying out "any of its functions" by providing information, consulting or "involving in another way".

6.2 Appendix A: Customer Needs analysis includes feedback from service users and voluntary and community sector providers that has informed the development of the Policy.

6.3 Voluntary and community groups and service user forums have also had the opportunity to comment on the Draft Policy. They have generally welcomed the Policy and have expressed desire to be involved as implementation takes place.

6.4 Service user involvement will take place at key stages during implementation. For example, the audit and review of compliance with the NHS Accessible Information Standard is currently underway in Adult Social Care and involves seeking service user feedback on their experience of communication with Adult Social Care. The audit will be used to improve the accessibility of communication in Adult Social Care and the learning will inform best practice across the Council.

8. EQUALITY IMPACT ASSESSMENT

8.1 An Equality Impact Assessment (EIA) is relevant to the decision and is provided at Appendix 2. No negative impact is identified. There will be general benefits from clearer, easier to read language and simple design in communications. Disabled people will benefit from better compliance with accessibility principles and methodology. Disabled people and people who do not speak or read English at all or very well will benefit from a more consistent access to and provision of interpretation and translation. Staff will benefit from improved training and awareness of accessibility principles and methodology.

9. LEGAL IMPLICATIONS

9.1 This Policy supports meeting our legal requirements set out in:

9.1.1 Equality Act 2010 to not discriminate, and to advance equality of opportunity for protected characteristics: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation. This may mean:

- removing or minimising disadvantages if it is connected to that characteristic;

- taking steps to meet the needs of people who share a relevant protected characteristic that are different from the needs of people who do not share it;
- encouraging people who share a relevant protected characteristic to participate in public life or in any other activity where their participation disproportionately low.
- to make reasonable adjustments to meet disabled people's needs

9.1.2 Web Content Accessibility Guidelines (WCAG)

All public sector organisations' websites and mobile applications must meet the international WCAG 2.1 Level AA standard alongside publishing an accessibility statement outlining the extent to which the website is accessible.

9.1.3 NHS Accessible Information Standard

Under the Care Act (NHS Accessible Information Standard), NHS and Adult Social Care services have a legal responsibility to provide clear access to information. This standard sets out a legal specification that guarantees that information and communications preferences are identified, recorded, flagged, and shared in order to meet the needs of 'patients, service users, carers and parents with a disability, impairment or sensory loss' (NHS, 2020).

10. FINANCIAL IMPLICATIONS

10.1 The Principles and Standards of this Policy will be incorporated into the Customer Experience programme and will be included within existing budgets.

11. BACKGROUND PAPERS

11.1 Mosaic (Adult Social Care recording system)

11.2 2020 School Census, Reading Borough Council

11.3 RBC Interpretation and Translation service records

11.4 Information from the Voluntary and Community Sector on Digital inclusion and Communication preferences of service users, Policy Team, Reading Borough Council, December 2020

This page is intentionally left blank

Accessible Information and Communications Policy



Contents

1. Policy Aims and Scope
2. Policy Context
3. Legal framework
4. What do we mean by Accessible Information and Communication?
5. Customer Needs Assessment
6. Our Principles and Standards
7. Principles into Practice

Appendix A Customer Needs analysis

Appendix B Gap analysis of our current practice against best practice

Appendix C Implementation Plan

1. Policy Aims and Scope

The aim of this policy is to have a clear, consistent, transparent and fair approach to the way we communicate and provide information. It reflects best practice in inclusion and accessibility for all and particularly for:

- People who are disabled
- People who do not speak or read English at all or very well
- People with low literacy
- People in digital poverty or who don't have access to IT

It covers:

- Internal and external communication
- Written, visual, audio, digital and face to face communication, including social media
- Documents / information (both physical and digital)
- Proactive and re-active communications
- Corporate correspondence
- Meetings
- Online forms and services
- Provision of Interpretation, translation, transcription and communication support
- Planning and design of information and communication channels and materials
- Customer engagement mechanisms

2. Policy Context

This policy supports Reading Borough Councils Customer Experience Strategy 2020-2024 which sets out the Council's commitment to customer service excellence - that every interaction will be a positive experience: better, faster, simpler; and recognises that some people might need extra support to access services, and that we must ensure it is available. It pledges to look at our services and processes through the lens of the customer to ensure services are accessible.

3. Legal framework

This policy supports the Council to meet legal requirements in relation to accessible information and communication. These come mainly from 3 areas:

The Equality Act; Web Content Accessibility Guidelines (WCAG) and the NHS Accessible Information Standard

3.1 Equality Act 2010

All the Council's services are required to meet the Equality Act 2010 requirement not to discriminate, and to advance equality of opportunity for protected characteristics: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation. This may mean:

- removing or minimising disadvantages if it is connected to that characteristic;
- taking steps to meet the needs of people who share a relevant protected characteristic that are different from the needs of people who do not share it;
- encouraging people who share a relevant protected characteristic to participate in public life or in any other activity where their participation disproportionately low.

The Equality Duty explicitly recognises that disabled people's needs may be different from those of people who are not disabled and there is a requirement to make reasonable adjustments.

3.2 Web Content Accessibility Guidelines (WCAG)

The Web Content Accessibility Guidelines (WCAG) are the international standard for producing a universal approach to web content accessibility for the needs of individuals, organisations and governments.

All public sector organisations' websites and mobile applications must meet the international WCAG 2.1 Level AA standard alongside publishing an accessibility statement outlining the extent to which the website is accessible.

The Web Content Accessibility Guidelines aim to ensure that all elements of the digital service are made more 'perceivable, operable, understandable and robust'

3.3 NHS Accessible Information Standard

Under the Care Act (NHS Accessible Information Standard), NHS and Adult Social Care services have a legal responsibility to provide clear access to information. This standard sets out a legal specification that guarantees that information and communications preferences are identified, recorded, flagged, and shared and met for 'patients, service users, carers and parents with a disability, impairment or sensory loss' (NHS, 2020). This standard does not apply to generic services or websites that adult social care users may use.

4. What do we mean by Accessible Information and Communication?

Accessible Information and Communication means using clear, easy to read language and simple, uncluttered design in all communications, and providing appropriate accessible formats and methods so that our communication includes everyone.

We are living in an increasingly digital age which has many benefits for access and inclusion e.g.:

- accessibility features on web sites can read out information to people with visual impairments
- translation apps enable people to translate information into their first language instantly

But we know that many people face obstacles accessing online services e.g.:

- not having the equipment or access to the equipment, to go online.
- not having the skills or ability to use the technology
- not having access to the internet
- anxiety/fear/lack of confidence in using the technology
- accessibility for disabled people
- language and literacy
- not having the assistance and support to go online
- preferring face to face to discuss complex issues.

This means we need to consider how disabled people, people who do not speak or read English at all or very well, people with low literacy and people in digital poverty or who don't have access to IT will be able to receive and understand our information and communicate with us.

5. Customer Needs Assessment

We have carried out a Customer Needs Assessment (Appendix A). We know from our residents' survey¹ that three quarters of residents prefer to receive information about council services via email and just over a half prefer to use the Council's website.

This means a quarter to half of residents prefer to receive information in other ways. Information from voluntary sector services and service users indicate that a variety of methods are needed to cater for different needs: face to face, phone; accessible formats, interpretation and translation and non-digital options.

¹ RBC Residents Survey 2018

In Adult Social Care the largest single needs are for large print and British Sign Language interpretation. It is estimated that 2,205 adults in Reading have severe hearing loss². Our translation and interpretation service had 330 requests for BSL during 2019/20.

Whilst Reading is a very diverse town and has twice the national average of households where no one in the household has English as their main language, just 2% of the Reading population (3,140 people) report that they cannot speak English at all or not well (Census 2011). This is in line with the national average. The main languages of the households with the highest numbers where English is not spoken at all or not well are Polish, Punjabi, Urdu, Nepalese, Bengali and Portuguese. This, along with Arabic and Romanian is reflected in Council's Interpretation and Translation service records.

Being able to find key information easily on the Council's website and to see themselves presented positively in Council communications is also important - for people to trust that the Council has their interests at heart and to feel encouraged to engage with Council messages.

² We used POPPI for prevalence estimates, which are modelled based on estimates in 'Hearing in Adults' (1995) Edited by Adrian Davis.

6. Our Principles and Standards for Accessible Information and Communication

As a result of our needs assessment and gap analysis (Appendix B) we will adopt the following principles and standards:

1) Full compliance with WCAG 2.1 Level AA standard for web accessibility

We will pursue full compliance with the WCAG 2.1 Level AA standard for web accessibility and communicate inclusion and accessibility principles and methodology widely across the staff base. This will improve understanding and use of the best practice tools available for accessibility of both online and offline information. This will apply to our own and outsourced communications, third-party communications provided via the Council, to the use of third-party communication vehicles e.g. websites and portals.

2) Work towards full compliance with the NHS Accessible Information Standard across all services

We will adopt the NHS Accessible Information Standard across all services for customers with disability, impairment or sensory loss. The roll-out of this will be built into our Customer Experience programme.

3) Positive Images

We will continue to present positive images of disabled people and ethnic diversity on our website and publications to encourage customers to use our services, to help them identify with the message and feel that they can trust the organisation. We will increase our photo library of real residents and service users so that images are more authentic and better represent local context.

4) Involve target audiences to understand what is effective for them

As part of inclusive communication, we will ask what our customers need to understand the messages that we want to give them and ensure they have the opportunity to let us know how they want to communicate with us.

5) Designated web page for disabled people

To make it easier for disabled people to access information that is most important to them we will have a designated page, signposted from the Website Home page, with clear information about the services which are the highest priority for them such as accessible toilets, Blue Badges and parking.

6) Telephone hotline to support all areas of the website

We will provide a Telephone hotline to support all areas of the website where people need assistance to find what they are looking for, complete a transaction, report a problem with accessibility. This will be promoted on the accessibility pages and staff taking the phone calls will receive additional training to enable them to deal effectively with the customer enquiry.

7) Design accessibility into information and communication

We will use clear, easy to read language and simple design. Use Trebuchet or similar (sans serif) font and a minimum font size of 12 point for paper copy.

8) Meet accessible communications needs on request.

We will make provision to be able to meet customers communications needs on request. In line with our Customer Experience Strategy customers will be able to receive support by telephone or face to face if they have additional needs and need to speak to an advisor or specialist. We will provide alternative channels for those who need additional support (e.g. face to face appointments). We will make provision for interpretation and translation, alternative formats and multiple channels on request and within a standard timescale, with clear information to customers and staff on standards and how to make a request.

9) Ensure the additional needs of customers are considered when designing communications

Where there is evidence of need and demand we will provide translated material and accessible formats in advance. We will develop a standard set of principles and criteria for when to make this provision.

10) Staff informed and trained on accessible information and communication

We will provide training and resources for staff on communicating in an inclusive and accessible way. This will be based on the Accessible Information Standard and WCAG 2.1. We will have an accessible information and communication section on our Intranet where staff can access

- Training
- Accessibility guidelines and resources
- Accessible Information Standard and WCAG 2.1
- Interpretation and translation service
- Data and evidence of need and demand for accessible formats and interpretation and translation.

7. Principles into Practice

We have prepared a road map (Appendix C) for putting these principles into practice.

8. References

[Customer Experience Strategy 2020-2024](#)

Equality Act 2010 [Equality Act 2010: guidance - GOV.UK](#)

Web Content Accessibility Guidelines (WCAG) [Understanding accessibility requirements for public sector bodies - GOV.UK](#)

NHS [Accessible Information Standard](#)

Customer Needs Analysis

1. General

We know from our residents' survey³ that three quarters of residents prefer to receive information about council services via email and just over a half prefer to use the Council's website. This reflects is broadly reflected across ethnicity.

In which of the following ways would you most prefer to receive information about council services?						
	Black, Asian And Minority Ethnic	Black, Asian And Minority Ethnic		White	White	
Option	Total	Percent		Total	Percent	
Via the Council website	40	54.79%	2	310	55.66%	2
Via email	57	78.08%	1	404	72.53%	1
Via smartphone applications	11	15.07%	4	49	8.80%	6
Via SMS text message	9	12.33%	5	48	8.62%	7
Via Twitter	1	1.37%	8	17	3.05%	9
Via Facebook	8	10.96%	6	65	11.67%	5
Via your local Councillor (including Councillor surgeries)	13	17.81%	3	131	23.52%	3
Campaigns, workshop sessions and forums	13	17.81%	3	76	13.64%	4
None of these	0	0.00%	9	4	0.72%	10
Other (please write in box below)	6	8.22%	7	45	8.08%	8
Not Answered	0	0.00%	9	4	0.72%	10

³ RBC Residents Survey 2018

2. Disability

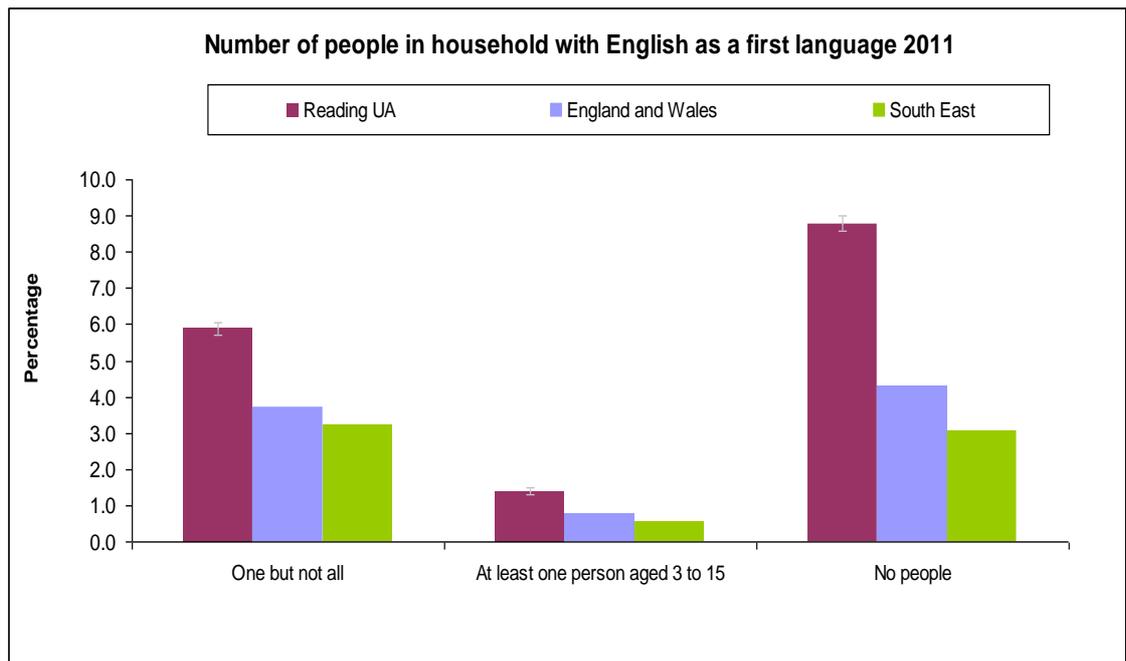
Regarding more specific needs, Adult Social Care record 79 clients in receipt of personal care who have specific communication needs. The largest single needs are for large print and British Sign Language interpretation.

Accessible Information Category	No of People
Communication support	30
Does use hearing aid	13
Requires third party to read out written information	1
Requires visual alert	1
Uses a citizen advocate	3
Uses alternative communication skill	5
Uses communication device	2
Uses personal communication passport	2
Uses sign language	1
Using Makaton sign language	2
Requires communication professional	11
Interpreter needed - British Sign Language	11
Requires specific contact method	4
Requires contact by email	1
Requires contact by letter	1
Requires contact by telephone	2
Requires specific information format	34
Requires information in Easy read	3
Requires information in Makaton	2
Requires information verbally	2
Requires written information in at least 20-point sans serif font	12
Requires written information in at least 24-point sans serif font	15
Grand Total	79

Source: Mosaic (Adult Social Care recording system)

3. Language

The Census 2011 records that around 84% of households in Reading have all members of that household with English as their first language. This is a lower proportion than the national and South East Region averages.



Source: ONS Census 2011

8.8% of households in Reading have no people in the household where English is a main language. This compares with 4.4% nationally.

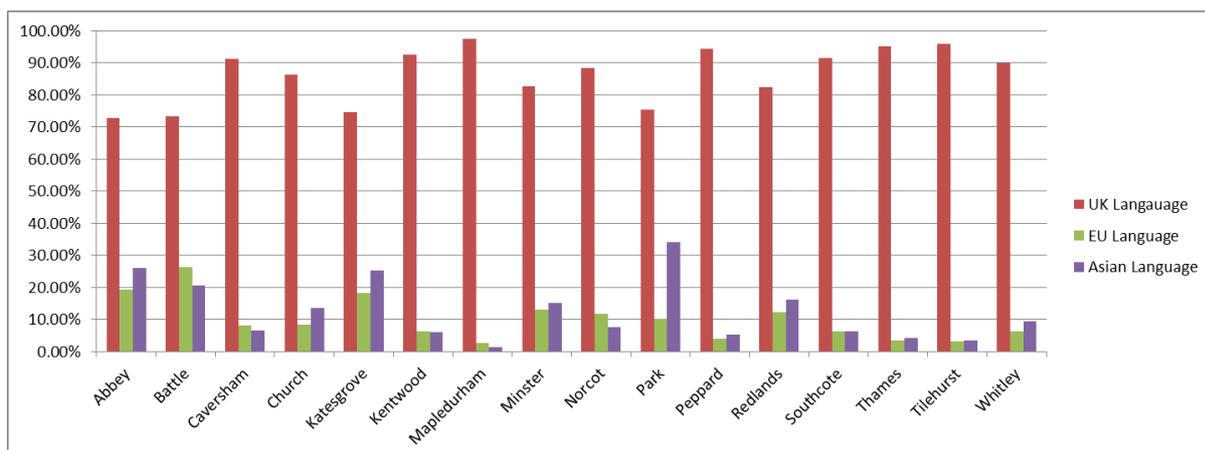
3.1 Languages spoken across Reading

The table below highlights the main languages spoken across Reading.

Main Language	Reading Count
English	126,690
Polish	3,768
Nepalese	2,430
Urdu	1,790
Punjabi	921
Portuguese	655
French	633
Arabic	600

Source: 2011 Census ONS

There are geographical differences as can be seen by the graph below.



Source: 2011 Census ONS

Annual Mother tongue records of Reading pupils show that diversity of pupils' main language is considerably greater than the whole population.

Mother tongue	Primary pupils	Secondary pupils
English	62.9%	67.7%
Urdu	4.4%	3.3%
Polish	3.6%	3.2%
Nepali	2.3%	2.1%
Hindi	1.6%	1.7%
Punjabi	1.5%	1.8%
Tamil	1.5%	1.3%
Arabic	1.4%	1.3%

Source: 2020 School Census, Reading Borough Council

3.2 Need for Interpretation and Translation

The main languages of the highest number of households in Reading where English is not spoken at all or not well are Polish, Punjabi, Urdu, Nepalese, Bengali and Portuguese

Main language	Main language is not English (English or Welsh in Wales): Cannot speak English or cannot speak English well (Census 2011)
Pashto	785
Romanian	823
Latvian	1,066
Persian/Farsi	1,101
Turkish	1,124
Gujarati	1,134

British Sign Language	1,147
Spanish	1,184
Italian	1,250
Hungarian	1,280
Tamil	1,294
Russian	1,688
Arabic	1,755
Cantonese Chinese	1,875
Lithuanian	2,032
Slovak	2,198
Portuguese	2,676
Bengali (with Sylheti and Chatgaya)	3,377
Nepalese	3,454
Urdu	4,292
Punjabi	7,799
Polish	18,349

The Council's Interpretation and Translation service recorded requests for 71 translations and 2530 interpretations during the period April-March 2019/20. The languages in highest demand for translation were Urdu, Nepalese, Polish, Arabic and Romanian; and the languages in highest demand for interpretation were Nepalese, British Sign Language, Polish, Romanian and Arabic. The tables below demonstrate the diversity of languages requested.

<u>No. of Translation request by each Language</u>	
Italian	1
Farsi	1
German	1
English	1
Turkish	1
French	1
Hindi	1
Bengali	2
Albanian	3
Braille	3
Tamil	3
Hungarian	3
Spanish	4
Portuguese	4
Punjabi	5
Romanian	6
Arabic	6
Polish	8

Nepalese	8
Urdu	9
	71

<u>No. of Interpretation request by each language</u>	
Macedonian	1
Gujarati	1
Tetum	1
Uzbek	1
Mirpuri	1
Telugu	1
Indonesian	1
Serbian	2
Latvian	2
Persian	2
Korean	2
Japanese	2
Lithuanian	3
French	4
Kurdish Sorani	4
Czech	4
Russian	7
Slovakian	8
Twi	8
Swahili	8
Farsi	8
Thai	9
Turkish	10
Pashto	11
Hindi	13
Greek	14
Hungarian	17
Somali	18
Albanian	20
Dari	24
Punjabi	27
Vietnamese	27
Bulgarian	28
Cantonese	31
Italian	33
Tamil	35
Mandarin	47
Bengali	57
Spanish	57

Sylheti	64
Portuguese	72
Urdu	97
Arabic	132
Romanian	295
Polish	319
British Sign Language	330
Nepalese	672
	2530

It is estimated that 2,205 adults in Reading have severe hearing loss⁴. Our translation and interpretation service had 330 requests for BSL during 2019/20. The BSL Covid video on the Council's website had the following no of hits:

Month	pageviews	unique pageviews
May	357	312
June	178	153
July	68	60
August	51	43
September	46	38
October	28	20

Adult Social Care records show 11 clients requiring a BSL interpreter but no requests for information in BSL.

3.4 Feedback from Access and Disabilities Working Group

The Council's Access and Disabilities Working Group campaigns for improved access for disabled people and acts as a pressure group in identifying and promoting public awareness of problems of access - primarily the physical barriers and exclusions imposed on people by poor design of buildings and places within the Borough. It also monitors and reviews the role of the Council as an employer and as a provider of services. It has given feedback to the Council, over the years on accessible information and communication. Its most recent feedback is:

- **Council's website**
 - Home page should have a designated page for disabled people; the key content being clear information about accessible toilets and Blue Badges and parking
 - Be accessible for screen readers
 - Present positive images of disabled people
- In response, the new website will include positive images of disabled people. There will be a designated page for disabled people providing easy

⁴ We used POPPI for prevalence estimates, which are modelled based on estimates in 'Hearing in Adults' (1995) Edited by Adrian Davis.

access to information such as toilets and parking, including a map of parking bay locations.

- **Polling Stations**
 - Ballot paper available in large print
 - Offer appropriate magnification magnifier
 - Offer a template

3.5 Feedback from Voluntary Sector Partners

We asked our voluntary sector partners for feedback on the needs their service users presented to them and what their experience was of the best methods for communicating with their service users.⁵

We received feedback from 32 voluntary sector partners serving a range of target service users, but the largest group was disabled people.

The feedback was clear that a variety of methods were needed to cater for different needs. A number commented that face to face communication was preferred and the phone was often the best alternative option for people; and that those with only a mobile could receive a text or WhatsApp.

‘A mixture:

Telephone (primary source of introduction - often to the family member/carer)

Video calling after introduction and according to individual circumstance (What’s App, Teams, Zoom, Skype)

Email as appropriate

Old fashioned postal mail (people do like detailed information in hard copy format to enable ongoing read throughs- this applies even to those who use email. It should be noted that when people indicate they have an email address we do check that they use it - often they don’t monitor it)

Group meetings - these have been set up during the pandemic and have been appreciated by several service users- we tend to use Zoom’

‘We have to be flexible. We need to meet with some; we need to phone some; we need to send text in different fonts to some; we need to send text highlighted colours for some; we need to send messages in short sentences to some. Some people need reminders. And so on.’

‘A phone call is a good way but overall, we find that face to face is by far the best way to communicate and more important confirmation of their understanding.

Some people can say yes (to please) but do not fully understand what has been written. Support to explain the information and consequences of their decisions if they make any.

⁵ Information from the Voluntary and Community Sector on Digital inclusion and Communication preferences of service users, Policy Team, Reading Borough Council, December 2020

Easy read documents are a good start- but again these need to be discussed so that systems/guidelines/information can be put into perspective and use examples of situations that people can learn from.'

'We usually phone our learners as this is the best method and we have set up smaller whatsapp class groups. Many learners don't have email accounts, so cannot respond to emails. We have a ... facebook page but not everyone connects to this. We send messages to them over mobile phones or their telephone (landline)'

'Whatsapp tends to be the best, as well as text message or phone call ... Zoom and other conferencing methods tend to be more difficult.'

The main specific needs reported were provisions of accessible formats to meet the diverse needs of disabled people, provision of interpretation and translation and non-digital options for communication.

'Very easy words - avoid jargon and big sentences
Big print - not enormous just over 14- 16 font size
Showing and explaining Easy Read documents with pictures or symbols'

'basic plain English and no jargon'

It was also pointed out the use of different platforms for video meetings was difficult for service users.

'Ease of use, consistency, e.g. some organisations use Zoom, others use Teams, others use Skype, others use Google Meet; organisations use different social media platforms - website, Facebook, Instagram, Twitter. If an individual has contact with multiple organisations, they may need to use a range of platforms.'

Gap Analysis and Recommended Action

Recommended Best Practise	Current RBC Practice	Action Required
<p>1. Full compliance with WCAG 2.1 Level AA standard for web accessibility</p> <p>We should pursue full compliance with Level AA and communicate the inclusion and accessibility principles and methodology widely across the staff base to improve understanding and use of the best practice tools available which will improve the accessibility of both online and offline information. This should apply both to our own and outsourced communications, third-party communications provided via the Council, and to the use of third-party communication vehicles e.g. websites and portals.</p>	<p>Currently the Reading Borough Council website is partially conformant with baseline Level AA tier of the WCAG 2.1. Areas of the website which lack AAA status include outdated PDF documents that do not meet accessibility standards, non-compliant downloadable documents, videos without BSL interpretation, captions or transcripts, and tables that have not been provided with titles, column or row headings.</p> <p>Awareness of what is required is low.</p> <p>Use of third-party websites and portals is common as is distribution of third-party communications. These are not necessarily compliant with WCAG 2.1 Level AA</p>	<p>Provide non-technical summary of the WCAG 2.1 Guidelines on an Accessible information and communication Intranet page to improve understanding and assist compliance.</p> <p>Incorporate into training package.</p> <p>Develop a comprehensive template for accessible on-line and off-line communications, both internal and external.</p> <p>Use of third-party websites and portals to be subject to approval by the Web Team for compliance with WCAG 2.1 Level AA</p> <p>Distribution of third-party communications to be subject to approval by the Communications Team for compliance with the accessibility template.</p>
<p>2. Work towards full compliance with the NHS Accessible Information Standard across all services</p>	<p>There are only 79 records on MOSAIC which indicates that identification and recording may not be comprehensively undertaken.</p>	<p>Audit and review compliance with standard in Adult Social Care and implement any improvements required.</p> <p>Use lessons learned to support other services to comply with the standard</p>

<p>The NHS Accessible Information Standard applies to adult social care services to guarantee that information and communications preferences are identified, recorded, flagged, and shared in order to meet the needs of patients, service users, carers and parents with a disability, impairment or sensory loss. It does not apply to generic services. It is recommended that the standard is adopted across all services for customers with disability, impairment or sensory loss and roll-out built into the Customer Experience programme going forward.</p>		<p>build into future specifications of customer relationship management systems</p>
<p>3. Positive Images Positive images of disabled people and ethnic diversity on our website and publications to encourage people that they are welcome to use services, to identify with the message and feel that they can trust the organisation.</p>	<p>The Communications team use a diverse range of images in communications where possible (social media, print). These are often sourced from library images.</p>	<p>Increase images of real residents and service users in our photo library so images are more authentic and better represent local context.</p>
<p>4. Involving target audiences to understand what is effective for them</p>	<p>As part of its compliance with the NHS Accessible Information Standard DACHS ask and record communication preferences of their clients.</p>	<p>Information on what we know about target audience communication preferences to be available on Accessible information and communication Intranet page.</p>

	<p>There are many good examples of involving target audiences e.g. Older People's Working group, Physical Disability and Sensory Needs working group, Access and Disabilities Working Group, Covid Public Health, Neighbourhood Team, Playgrounds team in DEGNS.</p> <p>Our website has been tested by people with a wide range of disabilities and is accredited by the Shaw Trust.</p> <p>This information is not consistently available for staff to access.</p>	Build awareness into Customer Experience Culture Shift programme.
<p>5. Designated web page for disabled people To make it easier for disabled people to access information that is most important to them we have a designated page, signposted from the Website Home page, with clear information about the services highest priority for them such as accessible toilets, Blue badges and parking.</p>	<p>The Reading Services Guide is available and promoted as the online service guide for Adult Care and Children's Services users. It provides a comprehensive directory of statutory and voluntary and community services for Reading residents, for which a key target audience is disabled people. The website is due for review.</p>	Explore the options as part of the review of the Reading Services Guide
<p>6. Telephone hotline to support all areas of the website Provision of a Telephone hotline to support all areas of the website where people need assistance to find</p>	Not provided currently	Set up a hotline and ensure that staff that pick up this line are specifically trained to deal with these enquiries. This number could be used to provide targeted support.

<p>what they are looking for, complete a transaction, report a problem with accessibility</p>		
<p>7. Design accessibility into information and communication All communication to use clear, easy to read understandable, inclusive language and simple, uncluttered design. Use of Trebuchet (sans serif) font and a minimum font size of 12 point for paper copy</p>	<p>A web content Style guide for staff is provided at https://intranet.reading.gov.uk/manual/intranet-guide/accessible-content, providing a link to a very detailed GOV.UK guide It specifies sans serif font</p>	<p>Develop a comprehensive template for accessible on-line and off-line communications, both internal and external.</p> <p>Raise awareness through link on Accessible information and communication Intranet page.</p> <p>Include in training</p>
<p>8. Provision to meet needs on request</p>	<p>Our Customer Experience Strategy commits to providing consistent customer experience across all channels across the Council and to providing services that are accessible for all and sets out that whilst the majority of customers will be encouraged to access services online, we will provide alternative channels those who need additional support (e.g. telephone or face to face if they are vulnerable and need to speak to an advisor or specialist). We provide a comprehensive Interpretation and Translation Service.</p>	<p>Raise awareness through link on Accessible information and communication Intranet page.</p> <p>Include in training</p>
<p>9. Provision to meet need identified in the design process</p>	<p>Staff are required to undertake Equality Impact Assessments which will include consideration of how information will be communicated and</p>	<p>Develop a standard set of principles and criteria, based on data and evidence of need and demand, for when and where we provide translations.</p>

	<p>decisions are made on a project by project basis which may lead to inconsistency in our offer.</p>	
<p>10. Interpretation and translation We will meet our Equality and Care Act duties by providing an Interpretation and Translation (I&T) service. We will provide clear information to customers about how they can ask for interpretation or translation and clear information for staff on standards and how to request a service on behalf of a customer.</p>	<p>We make provision to meet our Equality and Care Act duties by having an Interpretation and Translation (I&T) Team which procures services through a framework on behalf of Council services who then have SLAs or Pay as you go with I&T. Services respond to individual needs or requests from residents who need to understand information in their preferred form of communication, by booking a translation or interpretation from I&T. Where information is high priority such as the Covid guidelines and support, and/or needs communicating to a specific audience additional provision may be made. Not all staff may be aware that it is available or what is offered.</p> <p>There is currently no clear criteria or threshold for when general communications material should be provided in translations or other formats. (See 9 above)</p> <p>Website provides translation of webpages into other languages. We have a feedback link on</p>	<p>Information on the service included on accessible information and communication Intranet page providing information on what services are available, how to access languages most requested</p> <p>Add a specific 'accessibility' option in the form where customers can ask for alternative format or suggest accessibility improvements.</p>

	every page on the website (tab on the right of the page - also accessible to assistive tech)	
<p>11. Staff informed and trained on accessible information and communication</p> <p>We will provide training and resources for staff on communicating in an inclusive and accessible way. This will be based on the Accessible Information Standard and WCAG 2.1</p> <p>We will establish accessible information and communication section on our Intranet where staff can access</p> <ul style="list-style-type: none"> • Training • Accessibility guidelines and resources • Accessible Information Standard and WCAG 2.1 • Interpretation and translation service 	<p>We have a Communicate Information section on the Intranet</p> <p>https://intranet.reading.gov.uk/section/how-do-i/communicate-information where staff can find: a checklist on information on website accessibility, how to book interpretation and interpretation, style guides, how to make consultations accessible. There is no clear training offer or awareness programme.</p>	<p>Design and deliver training programme</p> <p>Establish accessible information and communication section on Intranet inc links to:</p> <p>Training</p> <p>Accessibility guidelines and resources</p> <p>Accessible Information Standard and WCAG 2.1</p> <p>Interpretation and translation service</p>

Accessible Information and Communication Implementation Plan

Task	Detail	Timescale
Accessible information and communication Intranet page	Content: <ul style="list-style-type: none"> • non-technical summary of the WCAG 2.1 • NHS Accessible Information Standard • information on target audience communication preferences • Accessible information and comms guide • web content Style guide • Interpretation and translation service details and guidance • Languages most requested • Customer Experience Strategy • Training package • Communication of the page to staff • Links from Customer Experience pages 	December 21 - March 22
Comprehensive template for accessible on-line and off-line communications, both internal and external	<ul style="list-style-type: none"> • Scoping of documentation • Design of template • Communication plan 	December 21
Training package	<ul style="list-style-type: none"> • WCAG 2.1 • NHS Accessible Information Standard • Inclusive communication <p>Built into Customer Experience Culture Shift/Team Reading programme</p>	December 21- March 22

Task	Detail	Timescale
Adoption of NHS Accessible Information Standard across all services	<ul style="list-style-type: none"> • Audit and review compliance with standard in Adult Social Care • Improvement plan • Whole council roll out plan 	September - December 21 TBA
Provision to meet need identified in the design process	Develop a standard set of principles and criteria, based on data and evidence of need and demand, for when and where we provide translations.	December 21
Positive Images	Increase images of real residents and service users in our photo library so images are more authentic and better represent local context.	October 21
Designated web page for disabled people	Build into Customer Experience Programme work on the website	TBA
Telephone hotline to support all areas of the website	Build into Customer Experience Programme work on the website	TBA
'accessibility' option on webpages for customers to ask for alternative format or suggest accessibility improvements.	Build into Customer Experience Programme work on the website	TBA

Equality Impact Assessment (EIA)

Name of proposal/activity/policy to be assessed: Accessible Information and Communications Policy

Directorate: Resources

Service: Corporate Improvement and Customer Services

Name: Clare Muir

Job Title: Policy and Voluntary Sector Manager

Date of assessment: 10/05/21

Version History

Version	Reason	Author	Date	Approved By
1	Initial	Clare Muir	10/05/21	
2	Update	Clare Muir	20/08/21	
3	Update	Clare Muir	01/09/21	
4	Update	Clare Muir	13/09/21	

Scope your proposal

1. What is the aim of your policy or new service/what changes are you proposing?

Aim: to provide a clear, consistent, and fair approach to the way the Council communicates and provides information, particularly considering:

- People who are disabled
- People who do not speak or read English at all or very well
- People with low literacy
- People in digital poverty or who don't have access to IT

Proposed changes: The Policy proposes 10 Principles and Standards:

1. **Pursue full compliance with the WCAG 2.1 Level AA standard for web accessibility** and communicate inclusion and accessibility principles and methodology widely across the staff base. This will apply to our own and outsourced communications, third-party communications provided via the Council, to the use of third-party communication vehicles e.g. websites and portals.
2. **Work towards full compliance with the NHS Accessible Information Standard across all services** for customers with disability, impairment or sensory loss. The roll-out of this will be built into our Customer Experience programme.
3. **Present positive images** of disabled people and ethnic diversity on our website and publications to encourage customers to use our services, to help them identify with the message and feel that they can trust the organisation.
4. **Involve target audiences** to understand what communication methods are effective for them
5. **Designated web page for disabled people** to make it easier for disabled people to access information that is most important to them
6. **Telephone hotline to support all areas of the website** where people need assistance to find what they are looking for, complete a transaction, report a problem with accessibility. This number will be promoted on the accessibility web pages above and will be answered by staff with additional training about accessibility.

7. **Design accessibility into information and communication** using clear, easy to read language and simple design.
8. **Meet accessible communications needs on request** for those who need additional support e.g. via telephone or face to face appointments, interpretation and translation, alternative formats and multiple channels on request, within a standard timescale, with clear information to customers and staff on standards and how to make a request.
9. **Ensure the additional needs of customers are considered when designing communications** and is based on data and evidence of need and demand.
10. **Staff are informed and trained** on accessible information and communication.

2. Who will benefit from this proposal and how?

Everyone will benefit from clearer, easier to read language and simple design in communications and

Disabled people will benefit from better compliance with accessibility principles and methodology.

Disabled people and people who do not speak or read English at all or very well will benefit from a more consistent access to and provision of interpretation and translation.

Staff will benefit from improved training and awareness of accessibility principles and methodology.

3. What outcomes does the change aim to achieve and for whom?

Ability to meet our legal requirements set out in the Equality Act 2010; to meet the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA standard; and NHS Accessible Information Standard

4. Who are the main stakeholders and what do they want?

Council service users particularly disabled users and users who do not speak or read English at all or very well.

The Council wants to provide information and get essential messages out to residents.

Being able to find key information easily on the Council's website and to see themselves presented positively in Council communications is important for people to trust that the Council has their interests at heart and to feel encouraged to engage with Council messages.

Assess whether an EqlA is Relevant

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

It relates to eliminating discrimination and advancing equality of opportunity by designing accessibility into information and communication using clear, easy to read language and simple design and making reasonable adjustments to meet the needs of disabled service users; and providing interpretation and translation services for people who may be excluded because they belong to a protected group that does not speak English.

Do you have evidence or reason to believe that some (racial, disability, sex, gender, sexuality, age and religious belief) groups may be affected differently than others? Make reference to the known demographic profile of the service user group, your monitoring information, research, national data/reports etc.

Yes - the Policy report provides a customer needs assessment. We know from our residents' survey¹ that three quarters of residents prefer to receive information about council services via email and just over a half prefer to use the Council's website.

This means a quarter to half of residents prefer to receive information in other ways. Information from voluntary sector services and service users indicate that a variety of methods are needed to cater for different needs: face to face, phone; accessible formats, interpretation and translation and non-digital options.

In Adult Social Care the largest single needs are for large print and British Sign Language interpretation. It is estimated that 2,205 adults in Reading have severe hearing loss². Our translation and interpretation service had 330 requests for BSL during 2019/20.

Whilst Reading is a very diverse town and has twice the national average of households where no one in the household has English as their main language, just 2% of the Reading population (3,140 people) report that they cannot speak English at all or not well (Census 2011). This is in line with the national average. The main languages of the households with the highest numbers where English is not spoken at all or not well are Polish, Punjabi, Urdu, Nepalese, Bengali and Portuguese. This, along with Arabic and Romanian is reflected in Council's Interpretation and Translation service records.

¹ RBC Residents Survey 2018

² We used POPPI for prevalence estimates, which are modelled based on estimates in 'Hearing in Adults' (1995) Edited by Adrian Davis.

-
- **Is there already public concern about potentially discriminatory practices/impact or could there be? Make reference to your complaints, consultation, feedback, media reports locally/nationally.**

Accessible communication and information is sometime raised as a concern through user forums and complaints.

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

If **No** you **MUST** complete this statement.

An Equality Impact Assessment is not relevant because:

X

Completing Officer

X

Lead Officer

Assess the Impact of the Proposal

Consultation

How have you consulted with or do you plan to consult with relevant groups and experts.

The Customer Needs analysis includes feedback from service users and voluntary and community sector providers that has informed the development of the policy.

The draft policy has been shared for feedback with voluntary and community groups and service user forums.

Service user involvement will take place during implementation. For example, the audit and review of compliance with the NHS Accessible Information Standard is currently underway in Adult Social Care and involves seeking service user feedback on their experience of communication with Adult Social Care. The audit will be used to improve the accessibility of communication in Adult Social Care and the learning will inform best practice across the Council.

Relevant groups/experts	How were/will the views of these groups be obtained	Date when contacted
Access and Disabilities Working Group Loneliness and Isolation Steering Group Older peoples working group Carers Forum	Attended meetings and invited feedback on proposals	March - Sept 2021
Voluntary and Community sector - organisations with expertise on specific disabilities and those organisations that had previously provided feedback during the customer needs analysis phase	Shared draft policy and invited feedback	July 2021

<p>Adult Social Care service users</p>	<p>Sample of users being surveyed as part of audit and review of compliance with the NHS Accessible Information Standard</p>	<p>August - October 2021</p>
<p>Shaw Trust</p>	<p>test out website</p>	<p>As projects develop</p>
<p>Staff and Unions</p>	<p>invite feedback</p>	<p>As projects develop</p>

Collect and Assess your Data

Using information from Census, residents survey data, service monitoring data, satisfaction or complaints, feedback, consultation, research, your knowledge and the knowledge of people in your team, staff groups etc. describe how the proposal could impact on each group. Include both positive and negative impacts.

(Please delete relevant ticks)

- Describe how this proposal could impact on racial groups
- Is there a negative impact? No

The main languages of the households with the highest numbers where English is not spoken at all or not well are Polish, Punjabi, Urdu, Nepalese, Bengali and Portuguese. This, along with Arabic and Romanian is reflected in Council's Interpretation and Translation service records.

The policy makes provision to to meet customers communications needs on request, through alternative channels for those who need additional support (e.g. face to face appointments) and provision for interpretation and translation within a standard timescale.

We will develop a standard set of principles and criteria for when and where we provide translated material and accessible formats in advance. This will be based on data and evidence of need and demand.

We will provide an Interpretation and Translation service with clear information to customers about how they can ask for interpretation or translation and clear information for staff on standards and how to request a service on behalf of a customer.

- Describe how this proposal could impact on Sex and Gender identity (include pregnancy and maternity, marriage, gender re-assignment)
- Is there a negative impact? No

- Describe how this proposal could impact on Disability
- Is there a negative impact? No

The policy is driven by best practice in accessible communication for disabled people. It sets out that we will provide alternative channels for those who need additional support. We will make provision for BSL interpretation and for people with visually impairments on request and within a standard timescale.

We will develop a standard set of principles and criteria for when and where we provide translated material and accessible formats in advance. This will be based on data and evidence of need and demand.

- Describe how this proposal could impact on Sexual orientation (cover civil partnership)
- Is there a negative impact? No

- Describe how this proposal could impact on age
- Is there a negative impact? No

- Describe how this proposal could impact on Religious belief
- Is there a negative impact? No

Make a Decision

If the impact is negative then you must consider whether you can legally justify it. If not you must set out how you will reduce or eliminate the impact. If you are not sure what the impact will be you MUST assume that there could be a negative impact. You may have to do further consultation or test out your proposal and monitor the impact before full implementation.

No negative impact identified

1. How will you monitor for adverse impact in the future?

We are in ongoing dialogue with the voluntary and community sector who work closely with and represent equality groups and will seek feedback from the sector.

We will monitor implementation of the various elements of the policy.

Clare Muir

Isabel Edgar

X

X

Completing Officer

Lead Officer

Accessible Information and Communication Implementation Plan

Task	Detail	Timescale
Accessible information and communication Intranet page	Content: <ul style="list-style-type: none"> • non-technical summary of the WCAG 2.1 • NHS Accessible Information Standard • information on target audience communication preferences • Accessible information and comms guide • web content Style guide • Interpretation and translation service details and guidance • Languages most requested • Customer Experience Strategy • Training package • Communication of the page to staff • Links from Customer Experience pages 	December 21 - March 22
Comprehensive template for accessible on-line and off-line communications, both internal and external	<ul style="list-style-type: none"> • Scoping of documentation • Design of template • Communication plan 	December 21
Training package	<ul style="list-style-type: none"> • WCAG 2.1 • NHS Accessible Information Standard • Inclusive communication Built into Customer Experience Culture Shift/Team Reading programme	December 21- March 22

Task	Detail	Timescale
Adoption of NHS Accessible Information Standard across all services	<ul style="list-style-type: none"> • Audit and review compliance with standard in Adult Social Care • Improvement plan • Whole council roll out plan 	September - December 21 TBA
Provision to meet need identified in the design process	Develop a standard set of principles and criteria, based on data and evidence of need and demand, for when and where we provide translations.	December 21
Positive Images	Increase images of real residents and service users in our photo library so images are more authentic and better represent local context.	October 21
Designated web page for disabled people	Build into Customer Experience Programme work on the website	TBA
Telephone hotline to support all areas of the website	Build into Customer Experience Programme work on the website	TBA
'accessibility' option on webpages for customers to ask for alternative format or suggest accessibility improvements.	Build into Customer Experience Programme work on the website	TBA

REPORT BY DIRECTOR OF FINANCE

TO: POLICY COMMITTEE

DATE: 23 SEPTEMBER 2021

TITLE: 2021/22 QUARTER 1 PERFORMANCE AND MONITORING REPORT

LEAD COUNCILLOR: COUNCILLOR MCEWAN

**PORTFOLIO: CORPORATE &
CONSUMER SERVICES**

SERVICE: FINANCIAL SERVICES

WARDS: BOROUGHWIDE

LEAD OFFICER: STUART DONNELLY

TEL: 01189 373468

**JOB TITLE: FINANCIAL PLANNING &
STRATEGY MANAGER**

**E-MAIL:
stuart.donnelly@reading.gov.uk**

1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 This report sets out the projected revenue and capital outturn positions for 2021/22 for both the General Fund and the Housing Revenue Accounts as at the end of June 2021 (Quarter 1). These forecasts include best estimates of the additional pressures arising as a result of Covid-19.
- 1.2 The forecast General Fund revenue outturn position as at the end of Quarter 1 is an overspend of £3.419m after the use of £3.844m of corporate contingencies.
- 1.3 This forecast position includes estimated gross revenue pressures of £3.175m arising as a direct result of Covid-19.
- 1.4 The Housing Revenue Account (HRA) is projecting an underspend of £0.333m as at the end of Quarter 1.
- 1.5 The General Fund Capital Programme is forecast to underspend by £11.306m in 2021/22.
- 1.6 The HRA Capital Programme is forecast to underspend by £8.456m in 2021/22.
- 1.7 £4.297m of 2021/22 savings are currently categorised as non-deliverable (red) with a further £3.543m categorised as at risk of delivery (amber).
- 1.8 There is one budget virement that requires approval from Policy Committee as set out in Section 5.
- 1.9 On 12 July 2021, Policy Committee approved that £3.968m of un-ringfenced Covid-19 grant funding be put into an earmarked reserve to meet the ongoing financial impacts of the pandemic. Bids have now been received amounting to £1.986m, and Policy Committee is requested to consider their approval. Further details are set out in Section 6 and Appendices 3 & 4.
- 1.10 The report also sets out performance against the measures of success published in the Council's Corporate Plan.

1.11 The detail supporting this report is included in the following appendices:

- Appendix 1 - Financial Monitoring for Quarter 1
- Appendix 2 - Corporate Plan Measures for Quarter 1
- Appendix 3 - BFFC Covid Funding Request
- Appendix 4 - DACHS Covid Funding Requests

2 RECOMMENDED ACTION

That Policy Committee note:

- 2.1 The forecast General Fund revenue outturn position as at the end of June 2021 is a net overspend of £3.419m after the use of £3.844m of contingencies;
- 2.2 The Housing Revenue Account is forecast to underspend by £0.333m as at the end of June 2021;
- 2.3 The General Fund Capital Programme is forecast to underspend by £11.306m;
- 2.4 The HRA Capital Programme is forecast to underspend by £8.456m;
- 2.5 £4.297m of 2021/22 savings are currently categorised as non-deliverable (red) with a further £3.543m categorised as at risk of delivery (amber);
- 2.6 The performance achieved against the Corporate Plan success measures as set out in Section 12 of this report and in Appendix 2.

That Policy Committee approve:

- 2.7 The budget virement set out in Section 5 of this report;
- 2.8 The bids for Covid-19 funding set out in Section 6 of this report and in Appendices 3 and 4.

3 POLICY CONTEXT

- 3.1 The Council approved the 2021/22 Budget and Medium-Term Financial Strategy 2021/22 - 2023/24 in February 2021.

4 GENERAL FUND REVENUE

- 4.1 The forecast outturn as of Quarter 1 is a £3.419m overspend and is broken down in the following table:

Table 1. General Fund Forecast 2021/22

	Budget £m	Forecast Outturn £m	Variance £m

Adult Care and Health Services	37.947	41.638	3.691
Economic Growth and Neighbourhood Services	18.492	21.656	3.164
Resources	16.336	16.508	0.172
Chief Executive	1.549	1.509	(0.040)
Children's Services retained by Council	0.724	0.724	0.000
Children's Services delivered by BFFC	47.392	47.392	0.000
Total Service Expenditure	122.440	129.427	6.987
Capital Financing Costs	15.495	17.047	1.552
Contingency	3.844	0.000	(3.844)
Other Corporate Budgets	4.387	3.111	(1.276)
Total Corporate Budgets	23.726	20.158	(3.568)
Net Budget Requirement	146.166	149.585	3.419
Financed by:			
Council Tax Income	(99.220)	(99.220)	0.000
NNDR Local Share	(32.095)	(32.095)	0.000
New Homes Bonus	(2.108)	(2.108)	0.000
Section 31 Grant	(3.549)	(3.549)	0.000
Revenue Support Grant	(2.040)	(2.040)	0.000
Other Government Grants	(6.739)	(6.739)	0.000
One-off Collection Fund Surplus	(0.415)	(0.415)	0.000
Total Funding	(146.166)	(146.166)	0.000
Over / (under) Budget	0.000	3.419	3.419

4.2 The following table reconciles Covid-19 and other pressures to the forecast outturn position:

Table 2. Covid-19 Revenue Pressures Impact on the 2021/22 Outturn Forecast

	Covid-19 Pressures £m	Other Net Pressures/ (Savings) £m	Forecast Outturn £m
Adult Care & Health Services	0.000	3.691	3.691
Economic Growth & Neighbourhood Services	3.035	0.129	3.164
Resources	0.140	0.032	0.172
Chief Executive	0.000	(0.040)	(0.040)
Children's Services retained by Council	0.000	0.000	0.000
Children's Services delivered by BFFC	0.000	0.000	0.000
Total Service Budgets	3.175	3.812	6.987
Capital Financing Costs	0.000	1.552	1.552
Contingency	0.000	(3.844)	(3.844)
Other Corporate Budgets	0.000	(1.276)	(1.276)
Total Corporate Budgets	0.000	(3.568)	(3.568)
Over / (under) Budget	3.175	0.244	3.419

Adult Care and Health Services

4.3 Adult Care and Health Services is forecasting a net overspend of £3.691m at Quarter 1. There are no direct additional pressures forecast arising from Covid-19 but it is likely there is a degree of residual impact included within the forecast position.

4.4 The forecast overspend is due to pressures comprising of:

- £2.591m pressures on placement budgets. There remains a significant pressure on placement costs where transformation work is containing any further cost pressures rather than delivering cashable reductions. Current weekly commitments are £0.826m against an available budget of £0.791m and has remained steady over recent weeks. Additionally, anticipated pressures from transitions and an overall increase in numbers have been included in the forecast.
- £0.800m forecast income shortfall. This is a recurring pressure from 2020/21 where contributions towards care were lower than previous years. Detailed work is underway to gain an understanding of what has caused the reduction.
- £0.300m of other net non-placement pressures across the directorate covering a number of small adverse variances across internal services.

4.5 Savings of £1.768m are forecast to be delivered against the target of £5.537m. The remaining £3.769m of forecast non-deliverable savings is included within the pressures outlined above.

Public Health - balanced budget

4.6 Public Health is currently forecasting to deliver on budget.

Economic Growth and Neighbourhood Services

4.7 The Directorate of Economic Growth and Neighbourhood Services is forecasting a net overspend of £3.164m at Quarter 1. The main variances are due to reduced levels of income in parking, and in planning and regulatory services where the recovery from the pandemic is happening more slowly than it was anticipated when the budget was set. In total the forecast adverse variance arising from the Covid-19 pandemic and its after-effects is £3.035m.

Transportation - £2.009m overspend

4.8 The service is forecasting a £2.009m overspend at Quarter 1 which is mostly arising from an anticipated income shortfall of £1.867m in the aftermath of Covid-19. Based on early year-to-date activity levels in parking and traffic enforcement, a cautious approach to the forecast is being adopted as the current numbers do not support a quick V-shaped bounce back in the first half of the financial year. Income levels in the first quarter are above those in the same period last year, but still below those in normal conditions. It is assumed that normal levels will be reached in Quarter 4. These adverse variances are occurring despite the temporary reduction in certain income budgets approved by the Council to recognise the impact of Covid-19 on income.

4.9 The other main elements of the projected overspend relate to a £0.070m overspend against Fleet Services and Strategic Transport. The former relates to a recent increase in vehicle insurance rates, while the latter relates to an income shortfall arising now that Greenwave Bus Services have transferred from the Council to Reading Buses Ltd.

4.10 There are further net pressures totalling £0.072m across the service.

Planning and Regulatory Services - £1.194m overspend

- 4.11 The service is forecasting a £1.194m overspend. There is a forecast net income shortfall of £0.794m. This comprises a fees & charges income shortfall of £0.968m across building control, license fees, planning applications and planning fees and charges as a result of ongoing Covid-19 recovery uncertainty and recruitment challenges. This is mitigated in part by a £0.174m Contain Outbreak Management Fund (COMF) relief grant due for the first 6 months of 2021/22.
- 4.12 There are two significant legal cases and a public enquiry arising within the service which are currently being disputed; the one-off costs of which are estimated at £0.575m for 2021/22, which if necessary could be funded from earmarked reserves at year-end. This pressure is partially mitigated by a staffing underspend due to vacancies within the service of £0.175m.

Housing and Neighbourhood Services (General Fund) - balanced budget

- 4.13 Housing and Neighbourhood Services is forecast to be on budget. The homelessness service is being monitoring closely for any signs of overspend pressure due to demand for temporary and bed and breakfast accommodation for single-households. The recent lifting on the ban on evictions may increase demand on the service and in anticipation of this an extra £0.250m of additional funding was added to the budget, but it is too early to know whether that will be sufficient for the year.

Cultural Services - £0.085m overspend

- 4.14 Cultural Services is forecasting a net overspend of £0.085m at Quarter 1 as a result of income lost due to Covid-19.
- 4.15 Many of the buildings, including the four leisure centres, Reading Museum, theatres and the Town Hall, were closed to the public during the pandemic. The forecast for Arts and Theatres assumes recovery in the theatres and further Arts Council England funding of £0.487m for the period April to June to support the reopening of The Hexagon, South Street and Reading Museum. The theatres are expected to resume full trading in the autumn from which time the bulk of performances are programmed.
- 4.16 The forecast variance is comprised of the following elements:
- £0.128m of pressures relating to the Town hall due to a forecast income being less than anticipated. Bookings for function rooms are significantly lower than expected, equating to an underachievement in income of £0.064m. The remaining £0.064m is due to a lag in realising the savings from the delayed restructure of the Town Hall commercial team.
 - £0.154m under-achievement of income relating to Reading Play within Leisure Services which have been operating a limited service supporting SEND and key worker children.

- £0.052m of non-delivered savings. Due to the delay in the in-house management restructure of Cultural services, there will be a lag in realising the full savings and £0.052m has been amber rated.
- £0.252m saving on the new leisure contract. The impact of the new leisure contract has been assessed and is expected to deliver a forecast underspend of £0.252m, as it started three months later than was assumed when the budget was set.
- £0.003m of other net pressures across the service.

Environmental and Commercial Services - £0.322m underspend

- 4.17 Environmental and Commercial Services is forecasting a net underspend of £0.322m at Quarter 1, which includes £0.156m of pressures arising from Covid-19.
- 4.18 The service is currently forecasting an underspend of £0.496m due to the introduction of Food Waste. A further £0.580m is being achieved through waste being diverted from disposal as a result of the significant change in how residential waste is generated since more of our residents have been working from home during the pandemic. The current trend of the reduction in disposal tonnages and the roll out of Food waste across the borough will need to be monitored in the light of future changes and impacts.
- 4.19 These savings are partially offset by the following pressures:
- Highways are forecast to overspend by £0.210m, predominantly relating to the cost of direct materials for Highways. In previous years this budget has tended to be insufficient but has been offset in part by income generation.
 - Business Development is expected to overspend by £0.195m due to continuing problems in achieving planning permission for new sites for advertising billboards & placeholders. This is making it difficult to achieve the increased income target set for this initiative.
 - Refuse Collection is forecast to overspend by £0.156m as additional staff have been recruited for a temporary period to provide extra capacity for increased waste collection due to more people working from home as a result of Covid-19 and to support the delivery of existing savings targets relating to the increased food waste tonnage generated by its diversion from landfill.
 - In Grounds Maintenance there is an anticipated income shortfall of £0.181m in children's play areas and allotments.
 - Other net pressures across the service of £0.012m.

Regeneration & Assets - £0.240m overspend

- 4.20 Regeneration & Assets is forecasting an overspend of £0.240m at Quarter 1.
- 4.21 In Assets Development, commercial tenants' income is £0.090m lower than budgeted due to approximately 70% under occupancy of the Acre park site.

- 4.22 For shops and garages, there is a forecast underspend of £0.200m in supplies and services costs. In the Corporate Property Service, it is expected that tenants in community properties will be able to return to the buildings now pandemic restrictions have been lifted, however the impact on lettings income will not be known until further on into the financial year.
- 4.23 Savings arising from the closure of Darwin Close, Hamilton Centre and the more efficient use of Bennet Road are partly red rated due to delay and a forecast overspend of £0.150m is included in the financial position. For Non-Housing Projects, there is a forecast overspend of £0.200m due to under recovery of income from recharges for time spent on projects.
- 4.24 There is a risk of a service charge liability materialising this year, which dates back over twelve years and relates to the Broad Street Mall. This is treated as a risk in this report and is not included in the forecast while the Assets Development service seek to mitigate the impact as part of the negotiation about a potential capital receipt for the site.
- 4.25 In Facilities Management some office buildings are operational, and staff have returned to certain sites, however there is a risk there may be an impact on recharges such as printing and post room, as there are be fixed costs that may not be recovered in recharges due to lower usage.

DEGNS Overheads - £0.042m underspend.

- 4.26 The service is forecasting a £0.042m underspend. There is a forecast income shortfall of £0.066m due to changes in the recharge of senior management time to the HRA. A review of other potential substitute recharges is underway. There is also a pressure relating to an unachieved digitisation saving of £0.064m. These pressures are mitigated by a staffing underspend due to vacancies totalling £0.172m.

Resources

- 4.27 The Directorate of Resources is currently reporting a net overspend of £0.172m at Quarter 1 which relates entirely to Human Resources & Organisational Development and primarily due to the loss of fees at Kennet Day Nursery. The forecast includes £0.140m of pressures arising from the ongoing impact of Covid-19.
- 4.28 All other services are currently forecasting to deliver on budget.

Human Resources & Organisational Development - £0.172m overspend

- 4.29 A pressure of £0.150m relates to Kennet Day Nursery of which £0.140m is due to the ongoing impact of Covid-19, specifically £0.110m due to loss of income and £0.030m due to additional staffing requirements. There is an additional pressure of £0.010m due to increased catering costs based on a new contract.
- 4.30 There is a pressure of £0.022m arising partially from non-deliverable savings relating to executive recruitment.

Chief Executive

- 4.31 Chief Executive is currently reporting a net underspend of £0.040m.

Communications - balanced budget

4.32 Communications is currently forecasting to deliver on budget.

Children's Services Retained by the Council

4.33 Children's Services retained by the Council are forecast to be on budget for 2021/22.

Children's Services Delivered by BFfC

4.34 BFfC currently expect to deliver services within the contract sum as at the end of Quarter 1. A small number of risks and pressures have been identified in several areas that are expected to be mitigated or rectified in the coming months, including:

- An increase in agency staff in Children's Social Care, causing pressures of £0.150m;
- Risks relating to Education of £0.040m due to reductions in funding for non-qualified teachers and £0.180m relating to Education Psychology;
- Potential future risks relating to school transport due to rising demand in one-to-one transport and an increase in SEN pupils.

Corporate Budgets

4.35 Corporate Budgets are forecasting a net underspend of £3.568m as at the end of Quarter 1. The majority of this variance relates to the unallocated corporate contingency of £3.844m.

4.36 Other Corporate Budgets is forecast to underspend by £1.276m and the Capital Financing budget is currently forecasting a net pressure of £1.522m.

5 GENERAL FUND REVENUE BUDGET VIREMENTS

5.1 The switching of resources (budgets) between approved budget headings is referred to as a budget virement.

5.2 The Scheme of Virement which sets out the required approval levels for budget virements is contained within the Council's Financial Regulations; material budget virements require approval from Policy Committee

5.3 There is one budget virement that has been requested so far in 2021/22 that requires approval Policy Committee as the total value is a transfer between budget headings within a cost centre which exceeds £0.500 million, as set out in the following table:

Table 3. Requested Budget Virements

Service	Cost Centre	Subjective	Current Budget (£m)	Proposed Virement (£m)
Environmental &	Civil Engineering	Street Lighting	0.735	(0.600)

Commercial Services				
Environmental & Commercial Services	Civil Engineering	Electricity	0.000	0.600
Total			0.735	0.000

- 5.4 The purpose of the virement is to code the electricity charges for streetlighting onto the electricity subjective code in future to align it with the other Corporate Energy Budgets. This will make it clearer to review the Corporate Energy expenditure for forecasting/efficiency monitoring purposes and keep the Energy Budget separate from the Maintenance expenditure.
- 5.5 The proposed budget virement has been approved by the Assistant Director for Environmental & Commercial Services; the Executive Director for Economic Growth & Neighbourhood Services and the Director of Finance.
- 5.6 Policy Committee is requested to approve the virement to allow it to be processed.

6 COVID-19

- 6.1 On 12 July 2021 Policy Committee approved that £3.968m of un-ringfenced Covid-19 grant funding be put into an earmarked reserve to meet the ongoing financial impacts of the pandemic.
- 6.2 Bids from demand led services to access this funding in order to redress pressures arising from or exacerbated by Covid have now been received amounting to £1.986m, broken down as follows:

Service	2021/22	2022/23	2023/24	Total
	£	£	£	£
BFFC	513,479	864,793	314,501	1,692,773
DACHS	293,280	0	0	293,280
Total	806,759	864,793	314,501	1,986,053

NB - A further £0.143m of funding has been allocated to DACHS from the Delivery Fund.

- 6.3 Full details are set out in Appendices 3 and 4 attached, and Policy Committee is asked to consider them on their merits and in the context of the Council's projected outturn position.
- 6.4 It is proposed that the remaining balance in this reserve is used to mitigate Covid-19 budget pressures in 2021/22.

7 SAVINGS PROGRAMME

- 7.1 Delivery of the Council's budget is predicated on achieving savings and additional income as agreed as part of the budget setting process in February 2021. Detailed monitoring of agreed savings is tracked on a monthly basis.
- 7.2 The projected financial impact of any non-delivery of savings have been included in the projected outturn position reported above.

7.3 The following table summarises the current forecast savings delivery for 2021/22 (a further detailed breakdown by saving is provided in Appendix 1):

Table 4. Delivery of 2021/22 Savings Programme

Service	Savings At Risk £000	Savings Delayed or at Risk £000	Savings on Track £000	Savings Achieved £000	Directorate Total £000
Adult Care and Health Services	2,971	1,595	971	0	5,537
Economic Growth and Neighbourhood Services	1,304	1,622	3,722	975	7,623
Resources	22	0	1,043	0	1,065
Corporate	0	326	77	462	865
Children's Services delivered by BFFC	0	0	5,118	0	5,118
Total	4,297	3,543	10,931	1,437	20,208

7.4 Any savings not delivered in 2021/22 will cause an immediate pressure on 2022/23 unless mitigated with alternative ongoing savings. Savings review meetings took place in the week commencing 28th June 2021 to scrutinise savings delivery in more detail and further work is currently being undertaken to establish what mitigating actions can be taken to facilitate savings delivery.

8 SUNDRY DEBT

8.1 Total General Fund sundry debt, over 30 days old, as at the end of Quarter 1 is £10.245m, compared to £17.396m as at the end of 2020/21. The following table shows the outstanding debt over 30 days old as at the end of June 2021:

Table 5. Outstanding Debt Over 30 Days Old

	1 to 2 months £000	2 to 3 months £000	3 to 6 months £000	6 months to 1 year £000	1 to 2 years £000	Over 2 years £000	Total Outstanding Debt £000
Adult Social Care	323	366	607	657	1,239	2,518	5,712
BFFC Customers	-	-	-	-	15	6	21
Balance Sheet Codes	-	14	-	5	-	13	31
Capital Cost Codes	1	585	-	109	12	-	707
Chief Executive	11	-	-	-	-	-	11
Corporate Codes	-	-	-	-	-	102	102
DEGNS	1,417	486	154	135	131	315	2,638
Directorate of Resources	467	108	38	24	12	373	1,022
DCEEHS	-	-	-	-	-	1	1
Total General Fund	2,219	1,559	800	930	1,410	3,328	10,245
Housing Revenue Account	2	4	-	-	2	16	24
Intercompany Debt	3,148	31	2	715	3,170	-	7,067
Total Including HRA and Intercompany	5,369	1,594	802	1,645	4,582	3,344	17,336

8.2 A review of the Council's debt management arrangements to harmonise and streamline collection processes and ensure associated bad debt provisions are

at the appropriate level is being undertaken as part of the work to mitigate against the current in-year financial gap resulting from Covid-19.

9 STAFFING

- 9.1 The Council currently has 105 agency contracts across the directorates. £0.144m has been spent on overtime during Quarter 1 in 2021/22, compared to £0.101m spent on overtime in Quarter 1 of 2020/21. The majority of this increase relates to staff employed to facilitate Covid-19 testing.
- 9.2 There have not been any redundancies to date during 2021/22.

10 HOUSING REVENUE ACCOUNT (HRA)

- 10.1 At Quarter 1 the HRA is forecast to end the year £0.333m net favourable against budget and £1.556m HRA Reserve movement to the HRA. The breakdown of the net variance is set out in the following table and explained below.

Table 6. Housing Revenue Account Forecast 2021/22

	Budget £m	Forecast Outturn £m	Variance £m
Management & Supervision	8.650	8.650	0.000
Special Services	3.090	3.090	0.000
Provision for Bad Debts	0.929	0.929	0.000
Responsive Repairs	2.413	2.517	0.158
Planned Maintenance	3.049	3.049	0.000
Major Repairs/Depreciation	10.710	10.710	0.000
Debt Costs	7.488	7.488	0.000
PFI Costs	7.318	6.827	(0.491)
HRA Income	(41.758)	(41.758)	0.000
Over/(Under) Budget	1.889	1.556	(0.333)
Movement to/(from) HRA Reserve	(1.889)	(1.556)	0.333

- 10.2 There is a £0.158m overspend forecast at Quarter 1 on Responsive Repairs. This is due to electrical work programme which could not be carried out last year due to the Covid-19.
- 10.3 The forecast at Quarter 1 includes an underspend on the projection for the PFI costs of £0.491m. This will need to be realigned in the HRA business plan during the year to identify any further pressures or opportunities.

11 CAPITAL PROGRAMME

- 11.1 The revised budgets have been updated to include the net budget roll forward requests from 2020/21 that were approved by Policy Committee in July 2021 as part of the 2020/21 Quarter 4 Performance and Monitoring Report.
- 11.2 The General Fund Capital Programme is currently forecast to underspend by a net £11.306m set out in the following table:

Table 7. Capital Programme Forecast 2021/22

	Original Budget £m	Revised Budget £m	Forecast Spend £m	Forecast Variance £m
Adult Care and Health Services	0.279	1.272	1.272	0.000
Economic Growth and Neighbourhood Services	50.584	74.409	68.475	(5.934)
Resources	4.559	7.409	7.568	0.159
Children's Services	20.899	24.969	24.429	(0.540)
Corporate	11.832	12.632	7.641	(4.991)
Total General Fund	88.153	120.691	109.385	(11.306)
Total HRA	39.675	45.494	37.038	(8.456)

11.3 Economic Growth and Neighbourhood Services schemes are currently forecasting to underspend by a net £5.934m, comprising:

- £2.803m overspend on the Construction of Green Park Station that is forecast to due to issues arising from the course of construction;
- £1.611m underspend on Replacement Vehicles due to the programme being on hold whilst being re-visited to include assessment of different fuel type options e.g. electric alternatives;
- £1.534m underspend on Reading Football Club Social Inclusion Unit which is currently delayed as the s106 monies to fund the scheme have not yet been received;
- £1.467m underspend on Renewable Energy as a result of delays in recruiting/establishing project management resource, realigning the programme in light of feasibility studies commissioned and more detailed and accurate mapping of the Project pipeline around planning approval & operational constraints. This particularly affects Smallmead Solar Farm and The Hexagon with the main spend now anticipated in 2022/23;
- £0.950m underspend on Central Library Reconfiguration/Refurbishment due to delayed commencement of the works;
- £2.759m of net underspends across other schemes.

11.4 Corporate schemes are currently forecasting to underspend by a net £4.991m. This is primarily due to the £5.000m budget relating to Minster Quarter no longer being expected to be utilised in year.

11.5 The Council was successful in bidding for additional capital grant funding received from the Public Sector Decarbonisation Fund and the Low Carbon Skills Fund. These schemes have been included within the Capital Programme.

11.6 The HRA Capital Programme is currently forecast to underspend by £8.456m. This is due to a £6.156m underspend in New Build & Acquisitions - Phase 2, a £1.829m underspend in Major Repairs and £0.471m net underspends across other schemes.

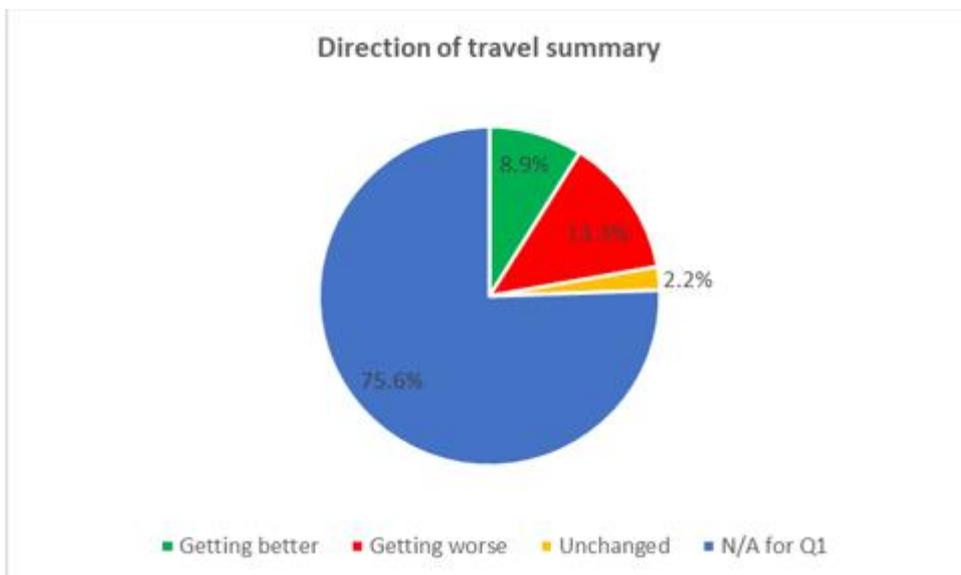
12 CORPORATE PLAN PERFORMANCE

- 12.1 A new one-year Corporate Plan for 2021/22 was published in March 2021, and a revised set of 45 performance measures have been developed for monitoring from April 21, along with a set of 77 key projects and initiatives which will help to deliver the Council’s mission and priorities.
- 12.2 These measures and projects have been identified by directorates as those that best demonstrate progress in achieving key outcomes. This report is therefore intended to provide an overview of the contribution that the Council makes across all its activities to improving Reading as a place to live, work and visit.
- 12.3 The performance measures and projects are set against each of themes of the Corporate Plan for 2021/22:
- Healthy environment;
 - Thriving communities;
 - Inclusive economy.
- 12.4 As well as these themes, performance information is also structured according to ‘Our foundations’ and ‘Covid response and recovery’.
- 12.5 The council’s performance management software system (InPhase) is used as the source for recording and monitoring progress against our performance objectives. Accessing the system online allows for further analysis and interaction with the data and a richer experience than when information is extracted and presented in a document format.
- 12.6 The tables below present a summary of the direction of travel for the Corporate Plan measures and a summary of the RAG status for the Corporate Plan projects.
- 12.7 Please note that ‘direction of travel’ information is limited for this quarter as many of the measures are new. The report includes performance for monthly and quarterly measures only; annual measures will be reported on at the end of the year.
- 12.8 The full set of quarterly data for all measures is attached at Appendix 2. The full list of projects is also available. RAG status and commentary have been provided for these.

Summary of direction of travel (measures)

- 12.9 The chart below displays an overview of the shifts in performance for the (monthly or quarterly) measures published in the Corporate Plan.

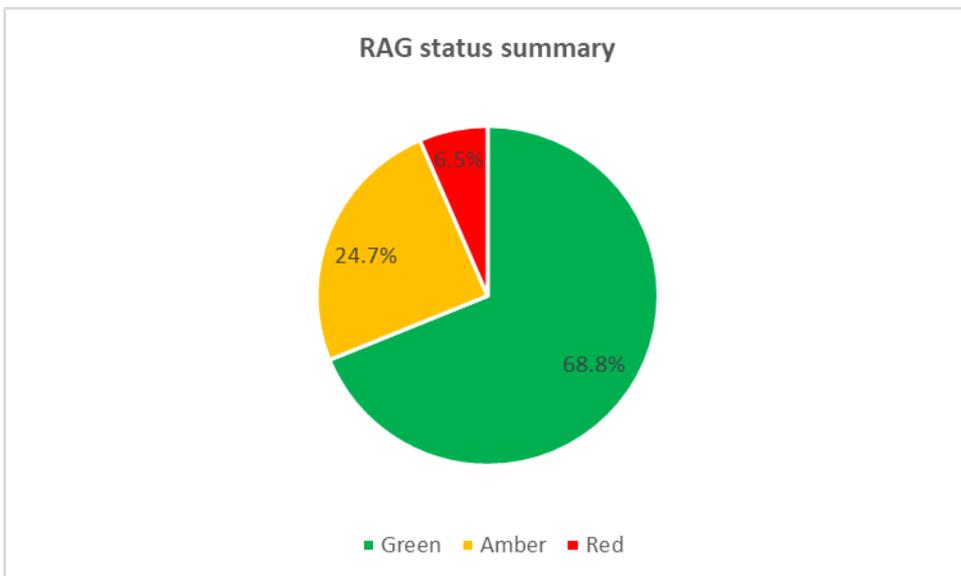
Getting better	4	8.9%
Getting worse	6	13.3%
Unchanged	1	2.2%
N/A for Q1	34	75.6%



Summary of RAG Status (projects)

12.10 The RAG status for the Corporate Plan projects is shown below. Future reports will show the change in RAG status from the previous period.

Green	53	68.8%
Amber	19	24.7%
Red	5	6.5%



13 CONTRIBUTION TO STRATEGIC AIMS

13.1 The Council’s vision is to ensure that Reading realises its potential - and to ensure that everyone who lives and works in Reading can share the benefits of its success. The Council has three inter-connected themes which contribute to delivering this vision. The themes are:

- Healthy environment;
- Thriving communities;
- Inclusive economy.

13.2 Delivery of the Council's budget is essential to ensuring the Council meets its strategic aims and remains financially sustainable going forward.

14 ENVIRONMENTAL AND CLIMATE IMPLICATIONS

14.1 The Council declared a Climate Emergency at its meeting on 26 February 2019. Whilst the Covid-19 situation has put significant pressure on the Council's finances, the work to tackle the Climate Change Emergency is continuing and has not yet been impacted by the financial position.

14.2 The Covid-19 pandemic has had a positive impact on air quality as a result of the initial lockdown and changes to the town centre that encourage increased walking and cycling.

15 COMMUNITY ENGAGEMENT AND INFORMATION

15.1 Budget-related communications and consultations will continue to be a priority over the next three years as we work to identify savings.

16 EQUALITY IMPACT ASSESSMENT

16.1 The equality duty is relevant to the development of the Budget and Corporate Plan. The specific savings and income proposals included in the budget are subject to consultation and equality impact assessments where required and these are being progressed as appropriate.

17 LEGAL IMPLICATIONS

17.1 The Local Government Act 2003 requires that the Authority reviews its Budget throughout the year and takes any action it deems necessary to deal with the situation arising from monitoring. Currently monitoring reports are submitted to Policy Committee quarterly throughout the year.

18 FINANCIAL IMPLICATIONS

18.1 The financial implications are set out in the body of the report and in Appendix 1 attached.

19 BACKGROUND PAPERS

- 2021/22 Budget and Medium-Term Financial Strategy 2021/22-2023/24 Report - Full Council - February 2021

This page is intentionally left blank

MONTHLY FINANCIAL REPORT

End of June 2021

CONTENTS

	Page No:
Revenue Position and Forecast - General Fund [GF]	2
Revenue Position and Forecast - Directorate of Adult Social Care and Health Services [DACHS]	3
Revenue Position and Forecast - Directorate of Economic Growth & Neighbourhood Services [DEGNS]	4
Revenue Position and Forecast - Directorate of Resources [DOR]	5
Revenue Position and Forecast - Chief Executive	6
General Fund Revenue Forecast and Savings Trends	7
Revenue Position and Forecast - Housing Revenue Account [HRA]	9
Capital Programme - General Fund & HRA	10
<u>Other Details</u>	
- Debt Performance	14
- Agency and Overtime Review	15
- Savings Summary	16

For further information regarding this report, please contact:

Stuart Donnelly
Stuart.Donnelly@Reading.gov.uk

Total General Fund - Period 3

Latest Revenue Position and Forecast

	Budget to Date £'000	Actual to Date £'000	Variance to Date £'000	Approved Budget £'000	Forecast Outturn £'000	Full Year Variance £'000
Objective Analysis						
Adults Care and Health Services	9,487	7,498	(1,989)	37,947	41,638	3,691
Economic Growth & Neighbourhood Services	4,623	7,934	3,311	18,492	21,656	3,164
Resources	4,084	8,111	4,027	16,336	16,508	172
Chief Executive	387	445	57	1,549	1,509	(40)
Children's Services retained by the Council	181	181	-	724	724	-
Children's Services delivered by BfFC *	11,848	23,696	11,848	47,392	47,392	-
TOTAL SERVICE BUDGETS	30,610	47,865	17,255	122,440	129,427	6,987
Capital Financing Costs	3,874	381	(3,492)	15,495	17,047	1,552
Contingency	961	-	(961)	3,844	-	(3,844)
Other Corporate Budgets	1,097	(8,514)	(9,611)	4,387	3,111	(1,276)
TOTAL INCL CORPORATE	36,542	39,732	3,190	146,166	149,585	3,419
Funding:						
Council Tax Income	(24,805)	-	24,805	(99,220)	(99,220)	-
NNDR Local Share	(8,024)	-	8,024	(32,095)	(32,095)	-
New Homes Bonus	(527)	(527)	0	(2,108)	(2,108)	-
Section 31 Grant	(887)	-	887	(3,549)	(3,549)	-
Revenue Support Grant	(510)	-	510	(2,040)	(2,040)	-
Other Government Grants	(1,685)	(22,019)	(20,334)	(6,739)	(6,739)	-
One-off Collection Fund Surplus	(104)	-	104	(415)	(415)	-
TOTAL FUNDING	(36,542)	(22,545)	13,996	(146,166)	(146,166)	-
NET CONTROLLABLE COST	0	17,186	17,186	0	3,419	3,419
Subjective Analysis						
Employee Costs	18,281	18,266	(15)	73,125	73,182	57
Premises Costs	4,000	2,732	(1,269)	16,002	15,949	(53)
Transport-Related Costs	588	419	(169)	2,352	2,421	69
Supplies and Services	12,779	(8,931)	(21,710)	51,117	47,845	(3,272)
Contracted Costs	52,117	44,980	(7,137)	208,466	211,161	2,695
Transfer Payments	4,538	1,024	(3,514)	18,153	18,152	(0)
CONTROLLABLE COST	92,303	58,490	(33,814)	369,214	368,710	(504)
Fees & Charges	(6,226)	(1,000)	5,226	(24,905)	(25,107)	(203)
Traded Services Income	(14,297)	(36,801)	(22,504)	(57,187)	(52,895)	4,292
Grants & Contributions	(71,781)	(56,129)	15,652	(287,122)	(287,289)	(167)
CONTROLLABLE INCOME	(92,303)	(93,930)	(1,627)	(369,214)	(365,291)	3,923
NET CONTROLLABLE COST	0	(35,440)	(35,440)	-	3,419	3,419

Adult Care and Health Services [DACHS] - Period 3

Revenue Forecast

	Budget to Date £'000	Actual to Date £'000	Variance to Date £'000	Approved Budget £'000	Forecast Outturn £'000	Full Year Variance £'000
<u>Objective Analysis</u>						
Commissioning & Improvement	219	196	(23)	877	877	0
Adult Services Operations	8,880	7,845	(1,035)	35,520	39,118	3,598
Public Health	(75)	(2,592)	(2,517)	(300)	(300)	-
Preventative Services	156	329	173	623	623	(0)
Directorate & Other	307	1,722	1,415	1,227	1,320	93
Suspense	-	(2)	(2)	-	-	-
Inactive Codes	-	1	1	-	-	-
NET TOTAL COST	9,487	7,498	(1,989)	37,947	41,638	3,691

Subjective Analysis

Employee Costs	3,163	3,900	736	12,653	12,798	145
Premises Costs	70	66	(4)	278	278	(0)
Transport-Related Costs	15	15	(1)	62	62	0
Supplies and Services	1,897	812	(1,085)	7,588	7,509	(79)
Contracted Costs	11,296	11,364	69	45,183	47,858	2,675
Transfer Payments	260	0	(260)	1,040	1,040	(0)
TOTAL EXPENDITURE	16,701	16,156	(545)	66,804	69,545	2,741
Fees & Charges	(81)	(2)	79	(325)	(243)	82
Traded Services Income	(2,183)	(1,966)	217	(8,732)	(7,864)	868
Grants & Contributions	(4,950)	(6,691)	(1,740)	(19,800)	(19,800)	0
TOTAL INCOME	(7,214)	(8,658)	(1,444)	(28,857)	(27,907)	950
NET TOTAL COST	9,487	7,498	(1,989)	37,947	41,638	3,691

There is significant uncertainty in respect of the assumed levels of forecast income throughout the directorate arising from the impact of Covid-19. These forecasts are closely monitored and are updated monthly.

Revenue Forecast

	Budget to Date £'000	Actual to Date £'000	Variance to Date £'000	Approved Budget £'000	Forecast Outturn £'000	Full Year Variance £'000
<u>Objective Analysis</u>						
Transportation	183	1,974	1,791	730	2,739	2,009
Planning & Regulatory Services	600	392	(208)	2,401	3,595	1,194
Housing and Neighbourhood Services	364	313	(52)	1,457	1,457	0
Cultural Services	1,271	836	(435)	5,082	5,167	85
Environmental and Commercial Services	3,391	3,552	161	13,564	13,242	(322)
Regeneration and Assets	(1,383)	656	2,039	(5,533)	(5,293)	240
DEGNS Overhead Accounts	198	214	17	790	748	(42)
Suspense	-	(2)	(2)	-	-	-
Inactive Codes	-	-	-	-	-	-
NET TOTAL COST	4,623	7,934	3,311	18,492	21,656	3,164

Subjective Analysis

Employee Costs	9,607	8,726	(881)	38,426	38,079	(347)
Premises Costs	3,612	2,617	(994)	14,447	14,394	(53)
Transport-Related Costs	564	393	(171)	2,257	2,326	69
Supplies and Services	6,399	7,754	1,355	25,598	26,239	641
Contracted Costs	2,595	1,547	(1,048)	10,381	10,401	20
Transfer Payments	(488)	(21)	467	(1,953)	(1,953)	(0)
TOTAL EXPENDITURE	22,289	21,017	(1,272)	89,156	89,486	330
Fees & Charges	(4,931)	(1,023)	3,908	(19,724)	(20,119)	(395)
Traded Services Income	(10,444)	(8,613)	1,830	(41,775)	(38,372)	3,403
Grants & Contributions	(2,291)	(3,446)	(1,155)	(9,166)	(9,340)	(174)
TOTAL INCOME	(17,666)	(13,083)	4,584	(70,664)	(67,831)	2,834
NET TOTAL COST	4,623	7,934	3,311	18,492	21,656	3,164

There is significant uncertainty in respect of the assumed levels of forecast income throughout the directorate arising from the impact of Covid-19. These forecasts are closely monitored and are updated monthly.

Revenue Forecast

	Budget to Date £'000	Actual to Date £'000	Variance to Date £'000	Approved Budget £'000	Forecast Outturn £'000	Full Year Variance £'000
<u>Objective Analysis</u>						
Resources Management	4	1	(3)	15	15	-
Customer Services	409	758	350	1,635	1,635	-
HR & Organisational Development	418	757	339	1,672	1,844	172
Audit & Insurance	352	1,061	709	1,408	1,408	-
Procurement Services	139	130	(10)	557	557	-
Financial Services	717	1,001	284	2,867	2,867	-
Legal & Democratic	606	2,382	1,776	2,423	2,423	-
IT Services	1,440	2,020	580	5,760	5,760	-
Suspense	-	(0)	(0)	-	-	-
Inactive codes	-	0	0	-	-	-
NET TOTAL COST	4,084	8,111	4,027	16,336	16,508	172

Subjective Analysis

Employee Costs	4,678	5,220	542	18,714	18,744	30
Premises Costs	90	38	(52)	361	361	-
Transport-Related Costs	8	7	(1)	33	33	-
Supplies and Services	1,536	2,602	1,066	6,145	6,155	10
Contracted Costs	1,619	1,280	(339)	6,476	6,476	-
Transfer Payments	303	955	651	1,214	1,214	-
TOTAL EXPENDITURE	8,235	10,102	1,867	32,942	32,982	40
Fees & Charges	(526)	24	551	(2,104)	(1,994)	110
Traded Services Income	(1,273)	(856)	417	(5,091)	(5,069)	22
Grants & Contributions	(2,353)	(1,160)	1,192	(9,411)	(9,411)	-
TOTAL INCOME	(4,151)	(1,992)	2,160	(16,605)	(16,473)	132
NET TOTAL COST	4,084	8,111	4,027	16,336	16,508	172

There is significant uncertainty in respect of the assumed levels of forecast income throughout the directorate arising from the impact of Covid-19. These forecasts are closely monitored and are updated monthly.

Revenue Forecast

	Budget to Date £'000	Actual to Date £'000	Variance to Date £'000	Approved Budget £'000	Forecast Outturn £'000	Full Year Variance £'000
<u>Objective Analysis</u>						
Chief Executive	213	271	58	853	813	(40)
Communications	174	174	(1)	696	696	-
NET TOTAL COST	387	445	57	1,549	1,509	(40)

Subjective Analysis

Employee Costs	357	420	63	1,429	1,389	(40)
Premises Costs	-	-	-	-	-	-
Transport-Related Costs	-	5	5	-	-	-
Supplies and Services	51	68	17	203	203	-
Contracted Costs	-	-	-	-	-	-
Transfer Payments	2	-	(2)	7	7	-
TOTAL EXPENDITURE	410	493	83	1,639	1,599	(40)
Fees & Charges	-	-	-	-	-	-
Traded Services Income	(9)	(0)	9	(35)	(35)	-
Grants & Contributions	(14)	(48)	(34)	(55)	(55)	-
TOTAL INCOME	(22)	(48)	(26)	(90)	(90)	-
NET TOTAL COST	387	445	57	1,549	1,509	(40)

There is significant uncertainty in respect of the assumed levels of forecast income throughout the directorate arising from the impact of Covid-19. These forecasts are closely monitored and are updated monthly.

GENERAL FUND REVENUE FORECASTS AND SAVINGS TRENDS

General Fund Revenue Forecasts and Weighted Risks

DACHS	DEGNS	DOR	Chief Exec	Children's Retained	BFFC	CORP	Total
(£000's)	(£000's)	(£000's)	(£000's)	(£000's)	(£000's)	(£000's)	(£000's)

Forecast Outturn

Period 2	4,180	5,553	22	(40)	-	-	(5,222)	4,493
Period 3	3,691	3,164	172	(40)	-	-	(3,568)	3,419
Period 4								
Period 5								
Period 6								
Period 7								
Period 8								
Period 9								
Period 10								
Period 11								
Per 3 Change	(489)	(2,389)	150	-	-	-	1,654	(1,074)

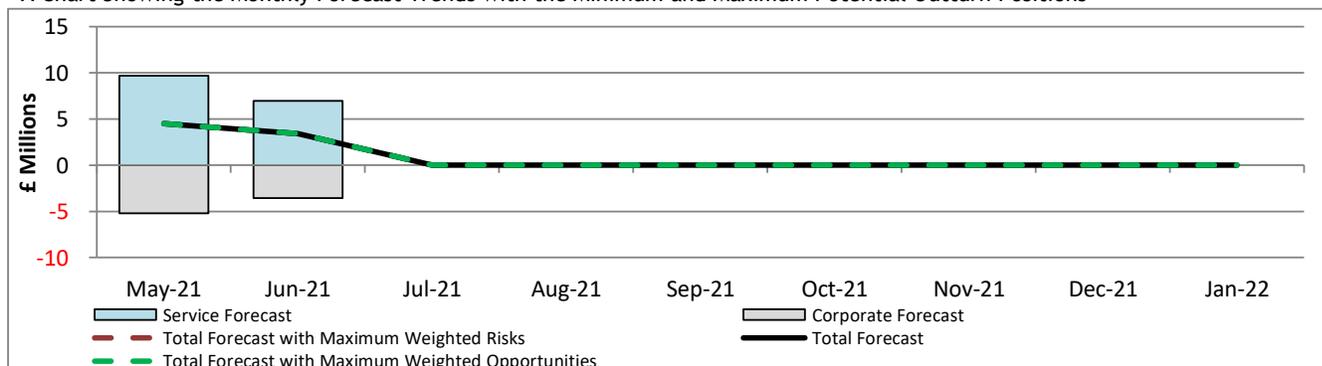
Weighted Risks

Period 2	-	-	-	-	-	-	-	-
Period 3	-	-	-	-	-	-	-	-
Period 4								
Period 5								
Period 6								
Period 7								
Period 8								
Period 9								
Period 10								
Period 11								
Per 3 Change	-	-	-	-	-	-	-	-

Weighted Opportunities

Period 2	-	-	-	-	-	-	-	-
Period 3	-	-	-	-	-	-	-	-
Period 4								
Period 5								
Period 6								
Period 7								
Period 8								
Period 9								
Period 10								
Period 11								
Per 3 Change	-	-	-	-	-	-	-	-

A Chart Showing the Monthly Forecast Trends with the Minimum and Maximum Potential Outturn Positions



GENERAL FUND REVENUE FORECASTS AND SAVINGS TRENDS

GENERAL FUND SAVINGS TRACKER

DACHS	DEGNS	DOR	CORPORATE	BFFC	TOTAL
(£000's)	(£000's)	(£000's)	(£000's)	(£000's)	(£000's)

Period 2

Red	2,971	664	22	-	-	3,657
Amber	1,595	714	-	326	-	2,635
Green	971	5,910	1,043	77	5,118	13,119
Blue	-	335	-	462	-	797
Total	5,537	7,623	1,065	865	5,118	20,208

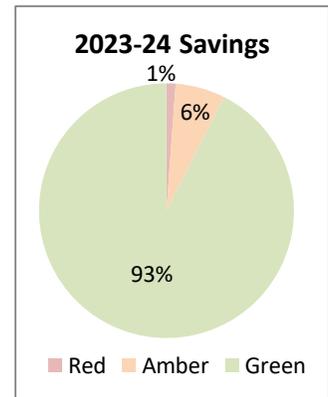
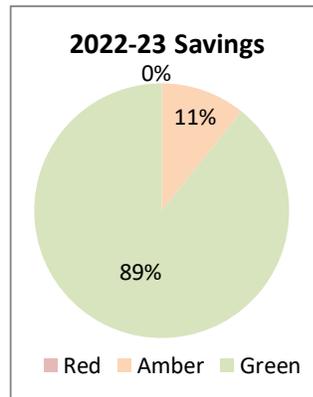
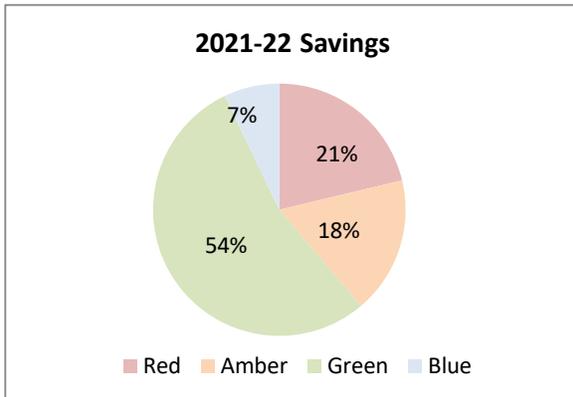
Period 3

Red	2,971	1,304	22	-	-	4,297
Amber	1,595	1,622	-	326	-	3,543
Green	971	3,722	1,043	77	5,118	10,931
Blue	-	975	-	462	-	1,437
Total	5,537	7,623	1,065	865	5,118	20,208

Period 3 Change

Red	-	640	-	-	-	640
Amber	-	908	-	-	-	908
Green	-	(2,188)	-	-	-	(2,188)
Blue	-	640	-	-	-	640
Total	-	-	-	-	-	-

The below barchart shows the rated 21-22 Savings target by "RAGB".



Housing Revenue Account [HRA] - Period 3

Revenue Forecast

	Budget to Date £'000	Actual to Date £'000	Variance to Date £'000	Approved Budget £'000	Forecast Outturn £'000	Full Year Variance £'000
<u>Objective Analysis</u>						
Dwelling Rents	(9,082)	(8,499)	583	(36,327)	(36,327)	-
Service Charges	(239)	(205)	33	(955)	(955)	-
PFI Credit	(999)	-	999	(3,997)	(3,997)	-
Other Income	(87)	(23)	64	(346)	(346)	-
Interest on Balances	(33)	-	33	(133)	(133)	-
TOTAL INCOME	(10,440)	(8,727)	1,712	(41,758)	(41,758)	-
Management & Supervision	2,163	589	(1,574)	8,650	8,650	-
Special Services	773	349	(423)	3,090	3,090	-
Provision for Bad Debts	232	-	(232)	929	929	-
Responsive Repairs	603	206	(397)	2,413	2,571	158
Planned Maintenance	762	368	(394)	3,049	3,049	-
Major Repairs/Depreciation	2,678	428	(2,250)	10,710	10,710	-
Debt Costs	1,872	-	(1,872)	7,488	7,488	-
PFI Costs	1,830	1,143	(687)	7,318	6,827	(491)
TOTAL EXPENDITURE	10,912	3,082	(7,829)	43,647	43,314	(333)
Movement to/(from) Reserve	(472)	-	472	(1,889)	(1,556)	333
NET TOTAL COST	-	(5,645)	(5,645)	-	-	-

Subjective Analysis

Employee Costs	1,051	892	(160)	4,204	4,204	-
Premises Costs	4,456	1,088	(3,368)	17,825	17,983	158
Transport-Related Costs	8	2	(7)	34	34	-
Supplies and Services	359	38	(321)	1,436	1,436	-
Contracted Costs	1,843	1,143	(700)	7,371	6,880	(491)
Transfer Payments	3,194	-	(3,194)	12,777	12,777	-
TOTAL EXPENDITURE	10,912	3,162	(7,750)	43,647	43,314	(333)
Fees & Charges	0	-	(0)	0	0	0
Traded Services Income	(9,440)	(8,807)	634	(37,761)	(37,761)	-
Grants & Contributions	(999)	-	999	(3,997)	(3,997)	-
TOTAL INCOME	(10,440)	(8,807)	1,633	(41,758)	(41,758)	0
Movement to/(from) Reserve	(472)	-	472	(1,889)	(1,556)	333
NET TOTAL COST	-	(5,645)	(5,645)	-	-	-

	2021/22	2021/22	2021/22	2021/22
Scheme Name	Original Budget £000	Revised Budget £000	Forecast Spend £000	Forecast Variance £000
General Fund Capital Programme				
Delivery Fund (Pump priming for Transformation projects)	1,732	2,532	2,532	-
Loan To RTL (Bus replacement programme)	5,000	5,000	5,000	-
Oracle Shopping Centre capital works	100	100	109	9
Minster Quarter	5,000	5,000	-	(5,000)
Corp Total	11,832	12,632	7,641	(4,991)
e-Marketplace & Equipment Renewal Portal Software	-	170	170	-
Mobile Working and Smart Device Replacement of Community Re-ablement Software	-	150	150	-
Co-located profound and multiple learning disabilities day opportunities and respite facility and sheltered housing flats	279	867	867	(0)
DACHS Total	279	1,272	1,272	(0)
Additional School Places - Contingency	1,170	1,428	1,428	-
SEN Provision - Avenue Centre	1,500	1,617	1,617	-
Asset Management	286	566	566	-
Children in care Emergency Provision	-	35	35	-
Civitas- Synthetic Sports Pitch	10	28	28	-
Crescent Road Playing Field Improvements	314	316	316	-
Critical Reactive Contingency: Health and safety (Schools)	500	954	954	-
Fabric Condition Programme	2,000	2,000	2,500	500
Green Park Primary School	-	459	-	(459)
Heating and Electrical Programme - Manor Pry Power	144	146	146	-
Heating and Electrical Renewal Programme	1,000	1,671	1,671	-
Initial Viability work for the Free School at Richfield Avenue	80	141	80	(61)
Low Carbon Skills Fund - Bid Development	-	5	5	-
Low Carbon Skills Fund - Schools Estate Project Delivery	-	24	24	-
Katesgrove Primary Trooper Potts Building	100	119	119	-
Meadway Early Years Building Renovation	600	756	756	-
Modular Buildings Review	500	500	500	-
New ESFA funded schools - Phoenix College	6,752	5,943	6,023	80
New ESFA funded schools - St Michaels	-	274	274	-

	2021/22	2021/22	2021/22	2021/22
Scheme Name	Original Budget £000	Revised Budget £000	Forecast Spend £000	Forecast Variance £000
Pinecroft-Children who have complex health, physical,sensory,disabulities & challenging behaviour	-	150	150	-
Dee Park Regeneration - Housing Infrastructure Fund (school)	4,100	3,852	3,852	-
Public Sector Decarbonisation Funds - School Estate Double Glazing Programme	-	1,293	1,293	-
SCD Units	473	473	473	-
School Estate Solar PV Programme	-	560	560	-
Schools - Fire Risk Assessed remedial Works	200	482	482	-
SEN early years at 1 Dunsfold	600	600	-	(600)
SEN Norcot	100	100	100	-
Thameside SEN Expansion	100	110	110	-
The Heights Temporary School	370	367	367	-
DCEEHS Total	20,899	24,969	24,429	(540)
Abbey Quarter restoration works	99	351	351	-
Accommodation Review - Phase 2A & B	100	133	133	-
Accommodation Review - Phase 2C (19 Bennet Road)	98	1,701	1,701	-
Active Travel Tranche 2	1,179	1,135	567	(567)
Additional Storage Capacity at Mortuary	-	15	15	-
Air Quality Monitoring	15	16	16	0
BFFC Accommodation Review	150	150	150	-
Annual Bridges and Cariage Way Works programme & Highway Infrastructure Works	5,592	5,854	5,854	-
Essential Bridge Works	-	200	200	-
Car Park Investment Programme (inc P&D, Red Routes & Equipment)	326	477	477	-
Cattle Market Car Park	-	523	523	-
CCTV	-	11	11	-
Central Library - Reconfiguration/Refurbishment Feasibility	920	970	20	(950)
Central Pool Regeneration	-	373	-	(373)
Chestnut Walk Improvements	-	35	35	0
Christchurch Meadows Paddling Pool	-	35	5	(30)
CIL Local Funds - Community	-	52	26	(26)
CIL Local Funds - Heritage and Culture	-	115	58	(58)
CIL Local Funds - Leisure and Play	-	213	107	(107)
CIL Local Funds - Transport	-	227	227	(0)
CIL Local Funds -Neighbourhood Allocation	-	477	477	-
Corporate Office Essential Works	300	350	350	-
Defra Air Quality Grant - Bus Retrofit	150	388	71	(317)

	2021/22	2021/22	2021/22	2021/22
Scheme Name	Original Budget £000	Revised Budget £000	Forecast Spend £000	Forecast Variance £000
Defra Air Quality Grant - Go Electric Reading	17	30	12	(18)
Transport Demand Management Scheme - Feasibility Work	50	50	50	-
Development of facilities at Prospect Park/Play	-	546	546	-
Digitised TRO's	300	300	300	-
Disabled Facilities Grants (Private Sector)	1,055	1,285	1,285	(0)
Eastern Area Access Works	140	199	199	-
Electric Vehicle Charging Points	50	250	250	-
Purchase of food waste and smaller residual waste bins	189	366	366	-
Foster Carer Extensions	130	200	200	-
Green Homes Scheme - GF element	495	495	495	-
Construction of Green Park Station	2,169	8,197	11,000	2,803
Grounds Maintenance Workshop Equipment	-	3	3	-
High Street Heritage Action Zone	-	1,185	1,185	-
Invest in Corporate buildings/Health & safety works	1,000	1,185	1,185	-
Invest to save energy savings - Street lighting	847	1,371	775	(596)
Leisure Centre Procurement	21,277	21,539	21,539	-
Local Traffic Management and Road Safety Schemes	150	458	458	-
Local Transport Plan Development	400	796	796	-
National Cycle Network Route 422	-	157	100	(57)
New Kit/Vehicles for Commercial Services Dvlpt	-	97	97	-
New Vehicle for Highways & Drainage Commercial Service	71	71	71	-
Oxford Rd Community Centre	147	147	-	(147)
Oxford Road Corridor Works	-	298	298	-
Playground equipment and Refreshment: Boroughwide	394	619	619	-
Private Sector Renewals	300	412	412	0
Provision of Gypsy & Traveller Accommodation	50	6	50	44
Pumping Station Upgrade Scheme (new)	-	250	250	-
re3 extending range of recyclables	84	94	94	(0)
Reading Football Club Social Inclusion Unit to SRLC	1,534	1,534	-	(1,534)
Reading Town Centre Design Framework	43	86	86	-
Reading West Station Regeneration Projects	2,039	3,493	3,493	0
Renewable Energy	250	250	250	-
	2,073	2,073	606	(1,467)

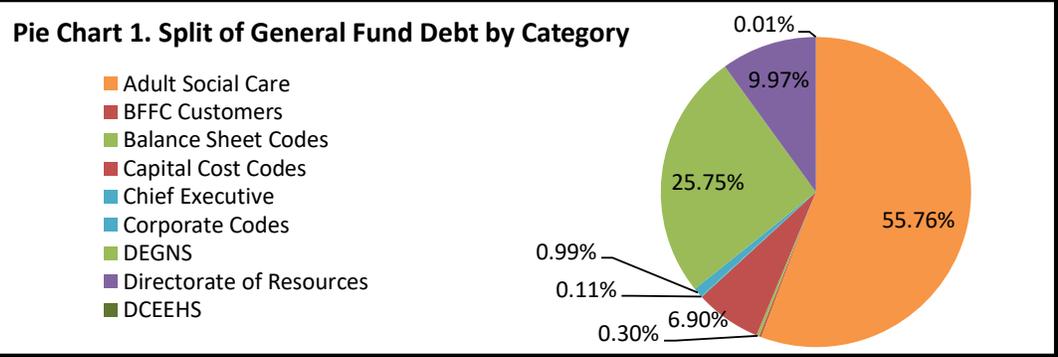
	2021/22	2021/22	2021/22	2021/22
Scheme Name	Original Budget £000	Revised Budget £000	Forecast Spend £000	Forecast Variance £000
Replacement Vehicles	2,931	2,553	942	(1,611)
Rogue Landlord Enforcement	-	75	75	-
S106 individual schemes list	-	334	334	-
Salix Decarbonisation Fund	416	800	861	61
Small Leisure Schemes	150	349	-	(349)
South Reading MRT (Phases 1 & 2)	-	400	400	-
South Reading MRT (Phases 3 & 4)	-	3,477	3,077	(400)
South Reading MRT (Phases 5 & 6)	1,750	2,000	2,000	-
The Heights Permanent Site Mitigation	268	615	615	-
Town Centre Improvements	130	450	350	(100)
Town Centre Street Trading Infrastructure	-	28	28	(0)
Town Hall Equipment	205	205	205	-
Traffic Management Schools	100	432	432	-
Tree Planting	50	30	30	-
Western Area Access Works	-	128	128	-
Harden Public Open Spaces to Prevent Incursion	25	40	40	(0)
Salix Re-Circulation Fund	300	497	363	(134)
Sun Street - Final Phase	-	76	76	(0)
Re-wilding highways, parks and open space verges	76	76	76	-
DEGNS Total	50,584	74,409	68,475	(5,934)
Customer Digital Experience	1,350	1,731	1,731	-
Universal Digital Systems	1,709	2,303	2,303	-
IT Future Operating Model	666	2,387	2,387	-
Re-Procurement / Reimplementation of Finance System	600	600	759	159
Cemeteries and Crematorium	34	85	85	-
Cremator Procurement	200	200	200	-
Cremator	-	103	103	-
DoR Total	4,559	7,409	7,568	159
Grand Total	88,153	120,691	109,384	(11,306)

HRA Capital Programme

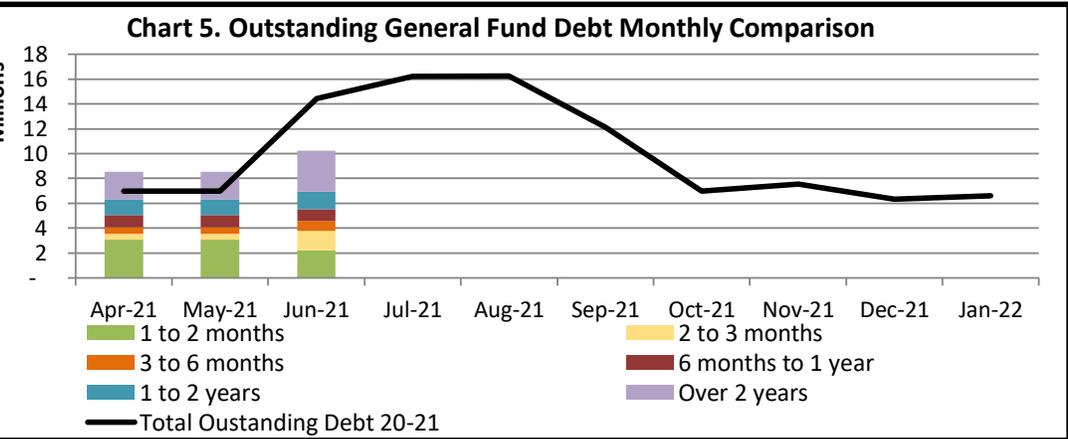
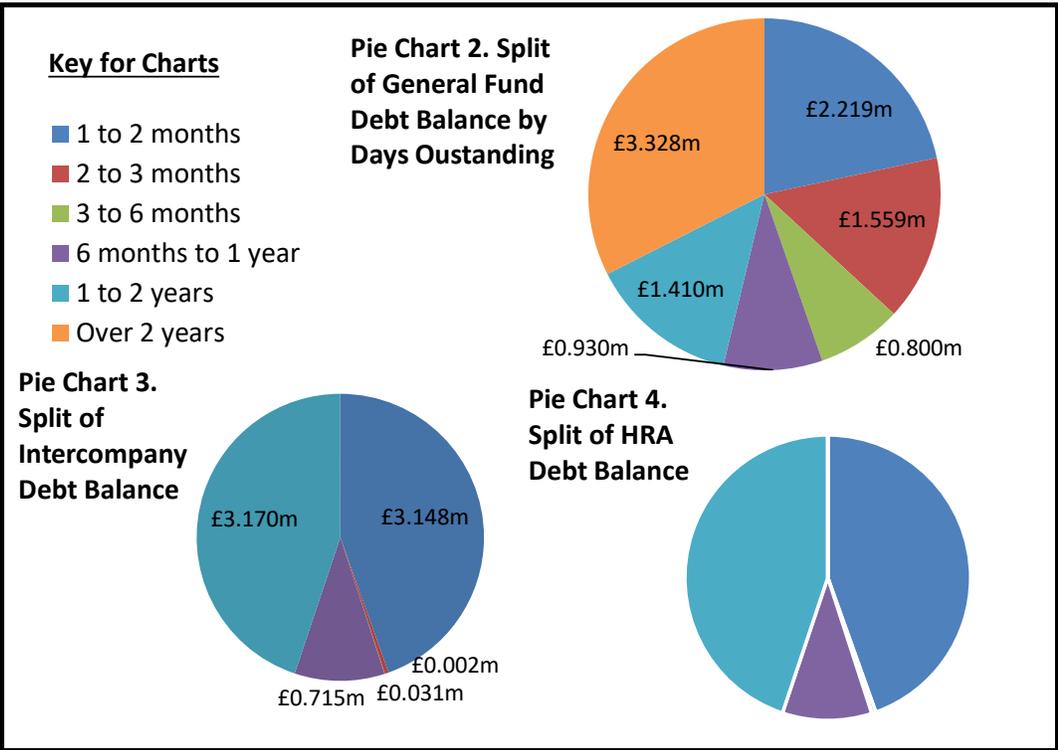
Major Repairs	9,212	10,188	8,359	(1,829)
Disabled Facilities Grants	500	512	500	(12)
Fire Safety Works	1,033	1,210	1,033	(177)
Green Homes Project - HRA element	831	831	831	-
New Build & Acquisitions - Phase 1	-	211	27	(184)
New Build & Acquisitions - Phase 2	10,682	12,619	6,463	(6,156)
New Build & Acquisitions - Phase 3	15,200	15,917	15,917	0
New Build & Acquisitions - Phase 4	-	1,400	1,400	-
Local authority new build programme for Older people and vulnerable adults	1,940	2,251	2,251	(0)
Housing Mngt System	277	355	257	(98)
Grand Total	39,675	45,494	37,038	(8,456)

Debt Performance - End of June 2021

The pie chart below shows the sundry debt as at the end of Period 3 (in excess of 30 days old) to total £10.245m.



Note: Adult Social Care includes Adult Client debt and invoices relating to NHS/CCG.



Agency and Staffing - End of June

Agency contracts with the council as at the end of Period 3.

Number of agency workers by directorate

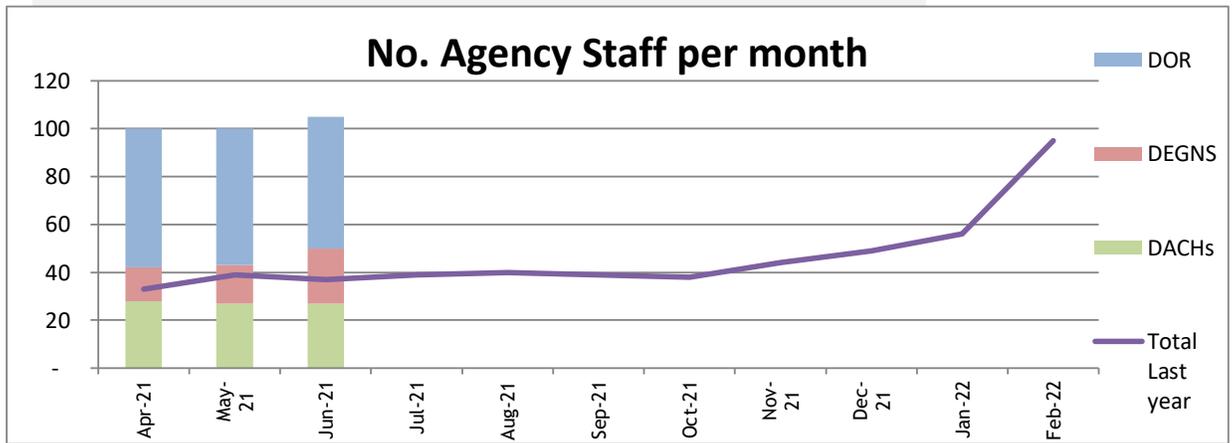
Directorate	Number of Agency Staff Period 3	Number of Agency Staff Period 2
DACHs	27	27
DEGNS	23	16
DOR	55	57
Total	105	100

Agency staff by post name (top 5)

Post name	No.
Testing Operative	18
Social Worker	15
Site Operative	9
Refuse Loader	8
Occupational Therapist	7

Agency spend by directorate per quarter (£000s)

Directorate	2020-21 (£000s)				2021-22 (£000s)			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
DACHs	356	344	323	405	559			
DEGNS	271	300	279	326	290			
DOR	230	315	232	398	612			
Total	857	959	834	1,129	1,461	0	0	0



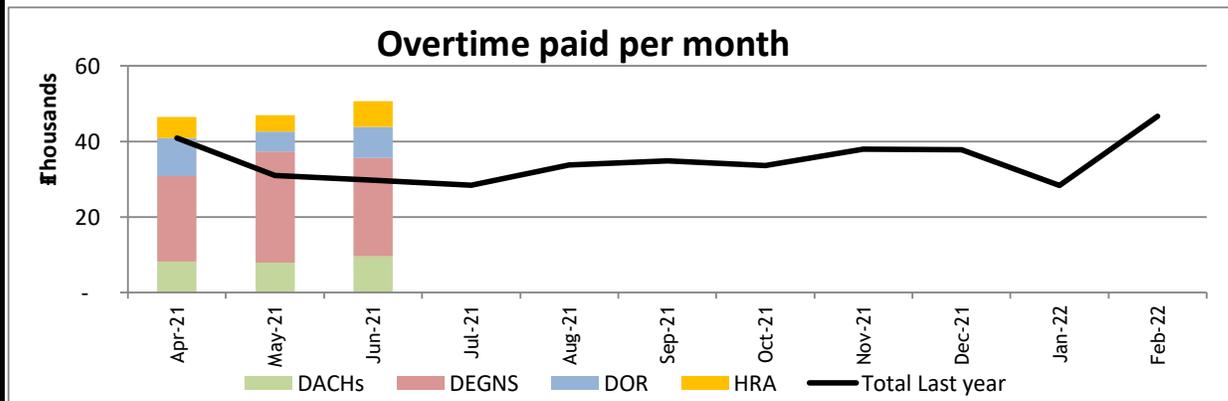
Redundancies within 2021-2022

Directorate	Redundancies Costs	No. of Redundancies
DACHS	£ -	0
DEGNS	£ -	0
DOR	£ -	0
HRA	£ -	0
Total	£ -	0

Overtime paid by directorate 2021-22

Directorate	June 2021 Only	Actual to Date 2021-22
DACHs	£ 9,612	£ 25,642
DEGNS	£ 26,078	£ 78,120
DOR	£ 8,163	£ 23,623
HRA	£ 6,784	£ 16,666
Total	£ 50,637	£ 144,050

Redundancy expenditure will either be funded through the capitalisation directive if the redundancy relates to transformation or through use of the redundancy revenue reserve. Currently no redundancy charges have been reflected in the Period 3 monitoring.

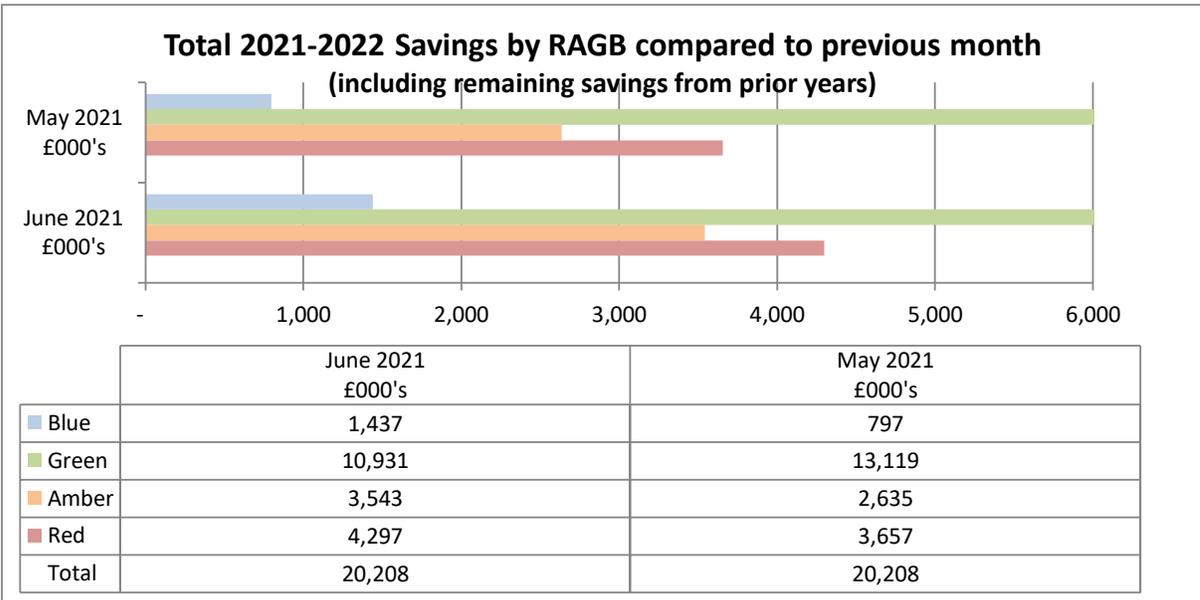


Savings 2021-2022 - End of June 2021

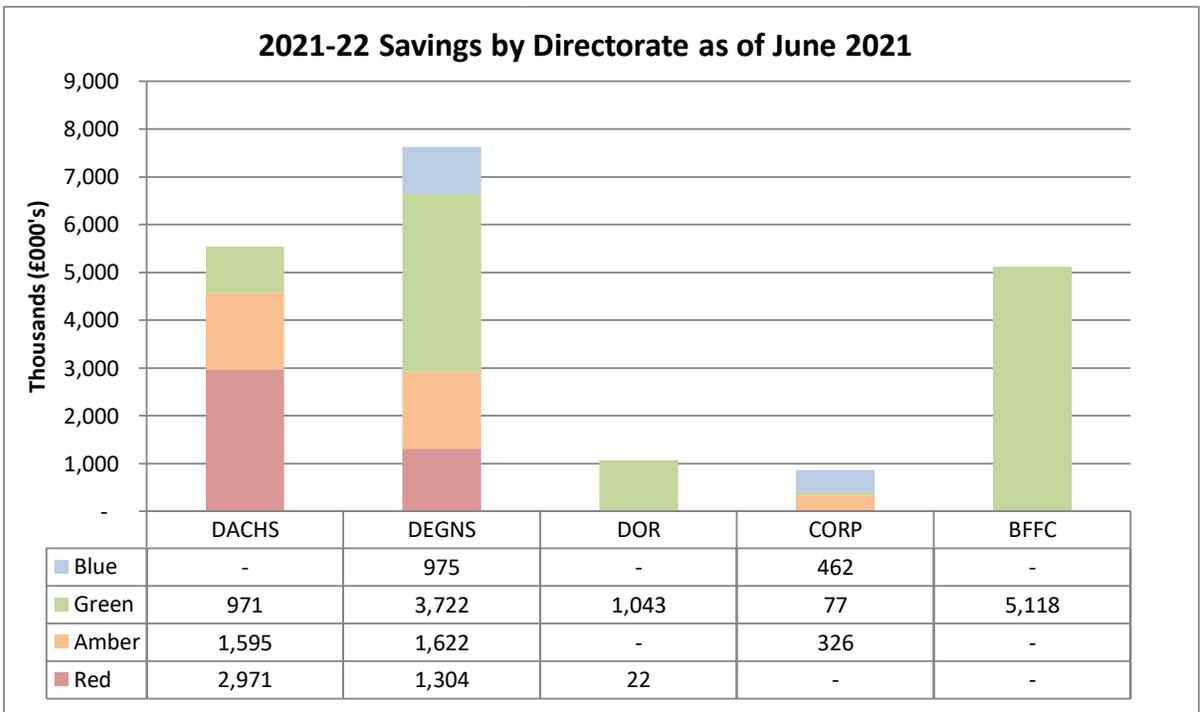
Savings

	Project delayed or unachievable and needs reviewing as part of MTFS
	Project has some issues or is at risk
	Project is progressing on track
	Project has been delivered and saving/income generation has been achieved

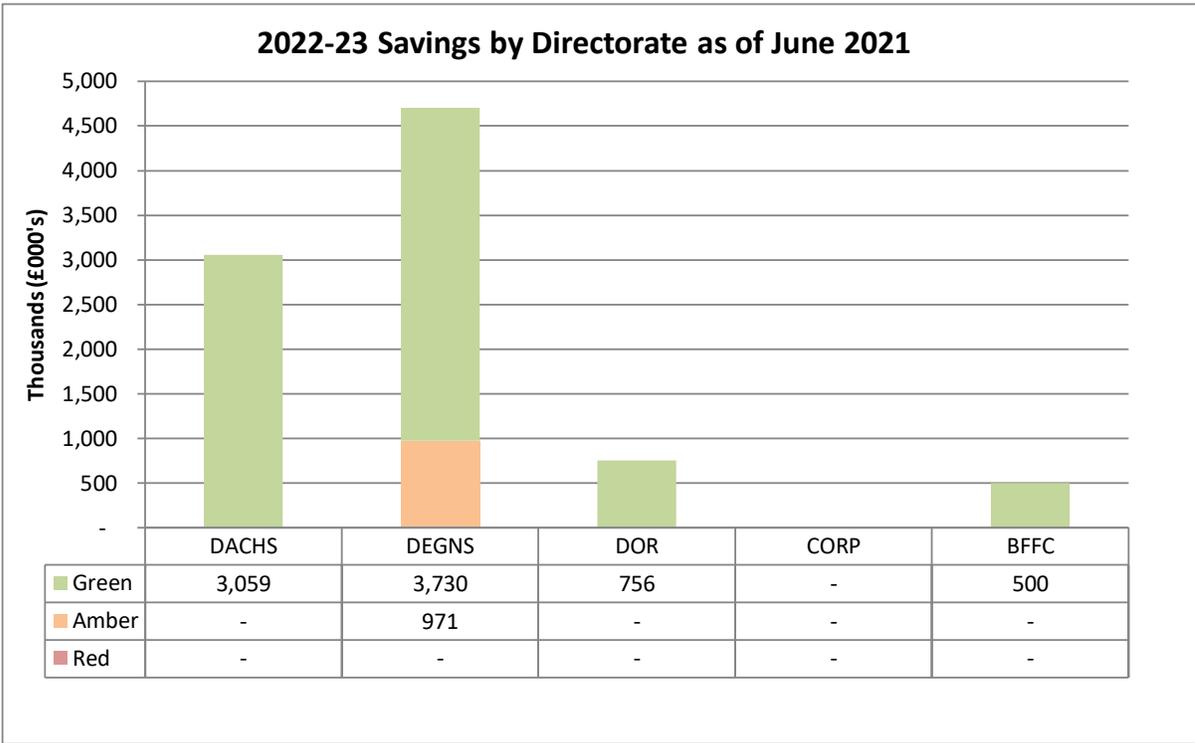
The below graphs shows the outstanding 2021-22 and prior year savings programme. This totals £15.344m for the overall council.



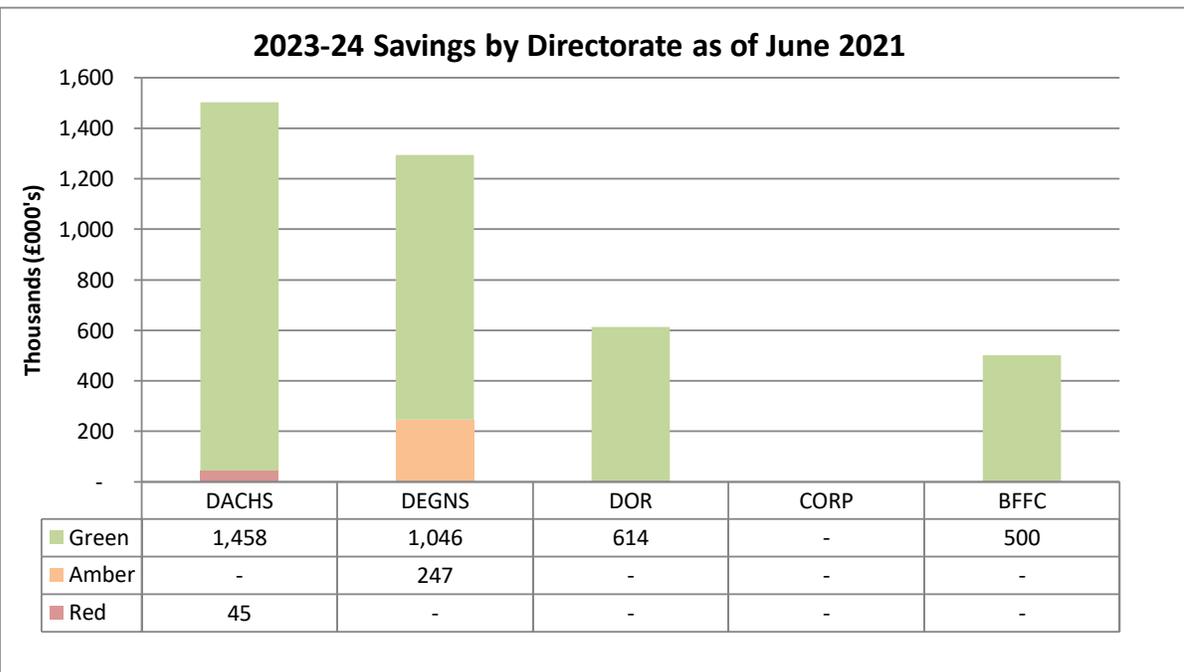
The graph below shows the 2021-22 RAGB rating per directorate as at June 2021 and the percentage per area.



The graph below shows the 2022-23 RAGB rating per directorate as at June 2021 and the percentage per area.



The graph below shows the 2023-24 RAGB rating per directorate as at June 2021 and the percentage per area.



List of Savings within 2021-22

Savings

SAVINGS PROPOSAL	Current Year Savings (£000s)				
	RED	AMBER	GREEN	BLUE	TOTAL
Directorate of Adults Care and Health Services					
Extension of Front Door Project; Stretch for Front Door Project	50	0	0	0	50
Reducing Adult Social Care contracts spend (Commissioning Delivery Model)	161	0	0	0	161
Mental Health and Locality Team Restructure	145	0	0	0	145
Extension of Provider Services	100	0	0	0	100
Additional Contract Reductions	179	0	0	0	179
DACHS Asset Review (incl. research on Dementia Outreach models)	200	0	0	0	200
Young people Transitions - Supporting young people into adulthood	0	333	167	0	500
Adult Social Care Day Service Review	0	0	150	0	150
Additional DACHS Staffing Efficiencies	550	0	0	0	550
TEC: Promoting the use of Assistive Technology	0	345	0	0	345
Increased usage of Direct Payments	250	0	0	0	250
Development of the Personal Assistant Market	109	0	0	0	109
Promoting Independence (Outcome Based Service Delivery)	0	0	427	0	427
Community Reablement (best practice and expansion)	250	0	0	0	250
Development of the Dementia Carers Offer	75	0	0	0	75
Income Maximisation - debt recovery	231	140	0	0	371
Increased usage of Assistive Technology and Equipment	200	0	0	0	200
Public Health Grant Reduction and Alternate Delivery Model	93	0	0	0	93
Alternative to Residential and Nursing Care for 18 to 64 Year Olds	0	94	0	0	94
Strengthening DACHS Decision Making & Supporting Practice Change	378	0	0	0	378
Review and Rightsizing of Care Packages (2021/2022)	0	683	227	0	910
Total Directorate of Adults Care and Health Services	2,971	1,595	971	0	5,537

SAVINGS PROPOSAL	Current Year Savings (£000s)				
	RED	AMBER	GREEN	BLUE	TOTAL
Directorate of Economic Growth & Neighbourhood Services					
School Crossing Patrollers	0	14	0	0	14
Fundamental Service Review - Parking	0	0	75	0	75
Smart Cities - communications saving	0	0	70	0	70
Review of Enforcement Contracts	50	0	0	0	50
Increased revenue from on-street Pay and Display	0	540	0	0	540
Increased income from Parking Enforcement	0	220	0	0	220
Increased provision of Red Routes	0	50	0	0	50
Extend Residents Parking permit areas	0	0	40	0	40
Increase to park permit charges	0	0	53	0	53
Review Public Car Park provision borough wide	200	0	0	0	200
Increase off street parking charges	150	0	0	0	150
Electric Vehicle Charging	0	26	0	0	26
Increase in fees and charges	0	0	3	0	3
Mandatory HMO Licensing	0	0	0	120	120
Discretionary HMO Licensing	20	0	0	0	20
Increase in charges for pre-planning application and planning fees	0	0	0	25	25
Reforecast income Licensing income budget	0	0	0	64	64
Increase in fees and charges	0	0	0	34	34

SAVINGS PROPOSAL	Current Year Savings (£000s)				
	RED	AMBER	GREEN	BLUE	TOTAL
Directorate of Economic Growth & Neighbourhood Services					
Reduction in professional specialist, management, enforcement and administrative resources; an increase to pre-planning application fees by 10%.	120	0	0	0	120
Town Centre Street Trading - New Pitches	0	0	30	0	30
Charge for pre-application for planning	0	0	0	25	25
Housing Property Services - income generation to General Fund	0	0	60	0	60
Housing Building Maintenance Income	0	0	31	0	31
Increase in fees and charges	0	0	4	0	4
Contribution from Public Health Grant	0	0	200	0	200
Additional Fees & Charges from Schools	0	0	0	110	110
Theatre Fees and Charges	0	0	0	50	50
In-house management restructuring of Cultural Services	0	52	0	48	100
Increase in fees and charges	0	0	0	56	56
Town Hall and Museum Additional income	0	0	0	100	100
Increase in Savings - Waste Operations	0	130	8	0	138
Food Waste and Smaller Bins	0	0	367	0	367
Fundamental Service review of Highways	0	0	100	0	100
Increase in trading through Reading Commercial Services	0	0	50	0	50
Increase income on green waste due to additional uptake in years 1-3 and fee increase in years 2-3	0	0	68	0	68
Fundamental Service Review - Parks and Street Cleansing	0	62	38	0	100
Increased income from traded waste services	120	0	249	0	369
Gross up budget for capital cost on recycling bins	0	0	19	0	19
Increase in fees and charges	0	0	5	0	5
Explore creation of coordinated enforcement operation across Regulatory & Transportation services	0	0	21	0	21
Review of Neighbourhood and Streetcare Services fees and charges and enforcement activity.	0	0	69	0	69
Additional income from advertising	25	0	0	0	25
Introduce a 24 hours a day, 7 days a week charge for all Town Centre Pay & Display (P&D)	0	0	25	0	25
Savings arising from the closure of Darwin Close, Hamilton Centre and more efficient use of Bennet Road	150	0	80	0	230
Increase income From Commercial Property Acquisitions	469	0	0	0	469
Review of Rents on Garages and Shops	0	0	30	0	30
Increase in fees and charges	0	0	22	0	22
Review and Restructure of Cleaning Services	0	125	0	0	125
Reductions on Training Budget	0	0	13	0	13
Digitisation Saving	0	0	69	0	69
Workforce Review [Transportation]	0	127	0	0	127
Increase parking permit charges	0	0	40	0	40
Concessionary Fares	0	0	400	0	400
Reduced expenditure/Review of expenditure budgets	0	0	0	67	67
Proposed Contract Savings - Young Persons Accommodation	0	0	70	0	70
Reduced operations at the Town Hall	0	127	0	241	368
Arts Fundraising campaign	0	20	0	0	20
Visa Verification	0	0	100	0	100
Rewilding highway verges	0	0	15	0	15
Waste Contract - Budget realignment inline with anticipated expenditure	0	0	500	0	500
Continued commercial growth of Highways service	0	0	31	0	31
In-sourcing of Highways Structures Consultancy	0	0	45	0	45
Review of office and workspace requirements	0	0	133	0	133
Energy savings in office space due to reduced occupation under Covid-19	0	0	100	0	100
Printing, Scanning & Post Efficiencies	0	80	0	0	80

SAVINGS PROPOSAL	Current Year Savings (£000s)				
	RED	AMBER	GREEN	BLUE	TOTAL
Directorate of Economic Growth & Neighbourhood Services					
Workforce Review [Planning & Regulatory Services]	0	49	0	0	49
Workforce Review [Housing]	0	0	70	0	70
Workforce Review [Cultural Services]	0	0	0	35	35
Workforce Review [Environmental and Commercial Services]	0	0	325	0	325
Workforce Review [Regeneration and Assets]	0	0	94	0	94
Directorate of Economic Growth & Neighbourhood Services	1,304	1,622	3,722	975	7,623

SAVINGS PROPOSAL	Current Year Savings (£000s)				
	RED	AMBER	GREEN	BLUE	TOTAL
Directorate of Resources					
Customer Services savings (Call Centre/Hub)	0	0	24	0	24
New customer services model	0	0	257	0	257
Exec Recruitment	22	0	34	0	56
Review of SLA with Schools	0	0	24	0	24
Re-procurement of agency contract	0	0	100	0	100
Realignment of Revenues and Benefits Transformation Target	0	0	25	0	25
Income generation from charging for services	0	0	2	0	2
Digitisation Saving	0	0	46	0	46
Redesign of Reception Centre to reflect greater self service options	0	0	42	0	42
Additional Service Proposals for Registrar Services	0	0	30	0	30
Reduction in staffing levels for HR and OD	0	0	58	0	58
Reduction in employer contributions arising from new Agency Contract	0	0	90	0	90
Increase in Fees and Charges (Kennet Day Nursery)	0	0	10	0	10
Reduction in annual contribution to self insurance fund	0	0	235	0	235
Flexible Retirement	0	0	21	0	21
Procurement of Case Management system	0	0	45	0	45
Directorate of Resources	22	0	1,043	0	1,065

SAVINGS PROPOSAL	Current Year Savings (£000s)				
	RED	AMBER	GREEN	BLUE	TOTAL
Corporate					
Appropriation of Land & Buildings to the HRA	0	0	0	462	462
Corporate Contractual Savings	0	326	0	0	326
Reducing mileage expenses through increased use of alternatives e.g. online meetings	0	0	77	0	77
Corporate	0	326	77	462	865

SAVINGS PROPOSAL	Current Year Savings (£000s)				
	RED	AMBER	GREEN	BLUE	TOTAL
Brighter Futures For Children					
BFFC Savings	0	0	5,118	0	5,118
Brighter Futures For Children	0	0	5,118	0	5,118

	RED	AMBER	GREEN	BLUE	TOTAL
TOTAL of Savings with Red rated elements within 2020-2021	4,297	3,543	10,931	1,437	20,208

Appendix 2 - Corporate Plan Measures for Quarter 1

Corporate Plan Theme	Measure	Frequency	Actual June 21 (Q1)	Current Year Target	DoT	Commentary
Healthy Environment	Food waste collection participation	Quarterly	N/A	50%		It has not been possible to produce this information due to waste service pressures, it will be reported on later in the year.
	Number of actionable potholes reported	Quarterly	524	2,750		
	Percentage of actionable potholes filled	Quarterly	100%	100%		
	Percentage of actionable potholes repaired within timescale	Quarterly	100%	99%		
	Waste recycling	Quarterly	52	45	↑ ✓	
	Food waste collected (Kg hh wk)	Monthly	2.85	1.4		
	Percentage of municipal waste land filled	Monthly	10.46%	16%		
Thriving Communities	Children in care in same placement for 2+ years	Quarterly	71			
	Education, Health and Care (EHC) plans completed within 20 weeks	Quarterly	83			
	LA schools rated good or outstanding	Quarterly	93	98.5		
	Placements for children within 20 miles	Quarterly	67%	75%		
	Re-offending rate (Youth Offending Service)	Quarterly	32			
	Secondary school fixed term exclusions	Quarterly	410	670		
	Sufficiency of early years providers	Quarterly	186			
	Direct payments	Monthly	21.1	22	↓ ✗	The % of adult DP users continues to steadily increase despite challenges like Covid-19, making the 2021-22 target of 22% more achievable.
	Number of TEC turnkey assessments	Monthly	44	30	↓ ✗	Referrals for the Turnkey TEC service has exceeded our expectations - an average of 40 assessments per month were undertaken in Q1 compared to the expected average of 30. Staff have made great use of the more comprehensive TEC offer that includes a holistic assessment, monitoring, a responder service and follow up review.

Corporate Plan Theme	Measure	Frequency	Actual June 21 (Q1)	Current Year Target	DoT	Commentary
	Percentage of new people who contact Advice & Wellbeing Hub who don't go on to a long term service	Monthly	91.4	85	↓ ✘	In exceeding the target for this measure, staff have demonstrated that they continue to embed the conversations count model and engage in strength based assessments. This evidences the positive outcomes of this approach for the people of Reading we support.
	Percentage of service user reviews completed annually	Monthly	41.4	70	↑ ✔	A dedicated Review Team has been established and posts recruited to. In Q1 the Team have focused on supporting people who have been discharged from hospital as this is a service priority however this will broaden into a focus on wider reviews across all service user groups.
	Residential admissions 65+ (per 100,000)	Monthly	83	36	↓ ✘	A dedicated Review Team has been established and posts recruited to. In Q1 the Team have focused on supporting people who have been discharged from hospital as this is a service priority however this will broaden into a focus on wider reviews across all service user groups.
	Licensed HMO's	Quarterly	40	35		Continue to work with landlords to ensure properties requiring a HMO Licence are licensed
	Superfast broadband coverage	Quarterly	99.2	100	→	
	Inclusive Economy	Young people in NEET	Quarterly	2.9	1.8	
	Number of jobs created	Quarterly	see commentary			KickStart 33 Starts, Business masterclass 22 self employed, IT skills for independent retailers 15 attendees, 4 poor performing schools had careers programmes and business connections 1,071 students benefited
	Participation at council cultural venues	Quarterly	5,172		↓ ✘	Venues closed/ restricted opening due to covid

Corporate Plan Theme	Measure	Frequency	Actual June 21 (Q1)	Current Year Target	DoT	Commentary
	People aged 16-64 who are unemployed	Quarterly	6%			registered unemployment steady decline since March - though still above regional and national average - no major redundancies identified. Evidence of 2500+ job vacancies posted and some hard to fill jobs
Covid Response & Recovery	Percentage of adult population vaccinated	Quarterly	40%			
	Percentage of businesses compliant with Covid Secure guidelines	Quarterly	93%			
	Contact tracing rate	Monthly	91%	80%	↓ ✘	Whilst there has been a small decline in the overall tracing rate from 93.1% in May the performance this period remains well above the target rate of 80%
	Covid cases contacted	Monthly	896		↑ ✔	
	Covid positive cases	Monthly	1,065.00		↑ ✔	
	Covid tests carried out	Quarterly	3,703			Covid Test Numbers are reported on the weekly COP sent to Silver and CMT. We are currently following national policy by targeting tests at a range of key groups. We don't though have any control over the number of tests being carried out beyond generally promoting testing as above or supplying tests to very defined groups such as the Asylum Seekers Hotel, Travellers and workers at the depot.
	Funding support to the third sector (Covid)	Quarterly	100			100% grants given; scheme now completed
	Mandatory and discretionary grants given to businesses (Covid)	Quarterly	£28m			£28m in grants following November 2020 restrictions. All mandatory grants schemes have closed and no further payments can be issued. Small sum of discretionary funding remaining, policy to be determine on allocation, circa £1m

Corporate Plan Theme	Measure	Frequency	Actual June 21 (Q1)	Current Year Target	DoT	Commentary
	Number accessing the One Reading Hub	Quarterly	9			9 people in Q1 were supported after contacting the ORCH directly, with a further 112 declaring a support need via Test & Trace. 1089 people were contacted for Isolation Support purposes
	Number of food voucher schemes delivered (Covid)	Quarterly	14,887			
Foundations	Customer satisfaction in the Customer Fulfilment Centre	Quarterly	88%	88%		
	Enquiries solved at first point of contact (CFC)	Quarterly	87%	86%		20,841 contacts solved at the first point of contact
	New services achieving the national customer services accreditation	Quarterly	0			The core customer fulfillment team were re-accredited in May 2021. Parking and FM support services are working towards assessment in May 2022.
	Number of services transitioned to the new model	Quarterly	3	8		3 functions now operating in the new model: Parking & FM now operate within Fulfillment model. Civic reception booking in place system. Pipeline functions: Community lettings booking system, Bus passes, Bulkywaste, fly-tipping and Missed bin process improvement underway.
	Transactions completed via My Account/Self Serve	Quarterly	70,683			
	Savings achieved	Quarterly	Total £1,437k DACHS £0 DEGNS £975k BFFC £0 Resources £0 Corporate £462k	Total £22m DACHS £5.5m DEGNS £7.6m Children's Services (BFFC) £5.1m Resources £1.9m		



Covid Recovery

Proposals to enable vulnerable and disadvantaged children and young people to 'catch up' and achieve long term positive outcomes:

- 0-2s
- Schools Recovery Grant
- Mental Health: Vulnerable Adolescents
- Looked After Children

For decision

For discussion

For information

SUMMARY

Proposals to support vulnerable children in Reading to "catch up" following the impact of the pandemic

OWNER

Vicky Rhodes, Kate Reynolds & Maria Young

VERSION

V1 draft

DATE

09/07/ 2021

© Brighter Futures for Children

Brighter Futures for Children
Civic Offices, Bridge Street,
Reading RG1 2LU

Company number 11293709



1. Supporting 0-2s and Parents

1.1 Evidence of Demand/Impact

Research provides evidence that lockdowns have negatively impacted the development and learning of 0-2s. There has been no additional government funding for the Early Years sector. This proposal will ensure opportunities are made available to help children catch up and avoid long term needs requiring later interventions. As accessing support before statutory school age is a choice, this new programme will engage health partners support to identify and reach families. The programme will run for 2 years.

1.2 Proposed Response

A graduated offer to support parents and provide babies with age appropriate learning opportunities they would normally have experienced in readiness for starting school.

Area of catch up support	Support Delivered	Impact
Speech, Language and Communication For reluctant/hesitant talkers. Parents supported & avoid unnecessary diagnosis	Speech and Language Therapy Upskilling Early Years and Childrens Centre staff	Children make good progress in the prime areas: Children access age appropriate opportunities and experiences Children enjoy secure attachment, bonding, develop early independence Reduced isolation and mental health amongst new parents through local community support Children with SEND access specialist support
Physical development Provide missed experiences and opportunities	Sport in Mind commissioned to deliver sessions	
Personal, Social, Emotional Development Developing emotional wellbeing and support to families	Children’s Centres Families access community-based support	
Parenting support Evidence based /Trauma informed support	Children’s Centres ‘Mellow’ parenting courses	
Children with SEND Additional needs are identified early and appropriately	Dingley’s promise Local specialist services	

1.3 Identification & Reach

An assessment will be introduced at 18 months to measure progress in the three prime areas of development (EYFS). This sits mid- way between the 9 month and 2-year-old health development reviews delivered by Health Visitors.

0-2 population in Reading	Anticipated number requiring universal catch up support	Anticipated number requiring targeted support
4000 *apx based on live birth data	2000 Universal support from Childrens Centres and Early Years Settings	200 Children identified from the 2000 requiring a focussed/individual intervention

1.4 Impact Targets

- Reduced waiting lists for speech and language therapy for under 5 years by 40%
- Increase take up of 2-year-old funding to 75%
- Increase families registered with Childrens Centres by 750

- 90% of children engaged demonstrate age appropriate development against the 3 prime areas in the Early Years Foundation Stage

1.5 Resources Required: September 2021 to August 2023

	2021/22	2022/23	2023/24
Staffing	139,248	245,276	105,009
Commissioned Services	58,333	100,000	41,667
Sub Total	197,581	345,276	146,675
Total			689,532

1.6 Supporting Information: Appendix 1

2. Schools Recovery Resources

2.1 Evidence of Demand/Impact

Reading schools remain concerned about the long-term impact of the lockdowns for those children who were unable to access education either face to face or virtually and those pupils who are already disadvantaged. Sir Kevan Collins estimated that pupils have lost on average over 115 learning days during the pandemic and that on average children are three months behind in their learning.

Research shows:

- Pupils have made less academic progress compared with previous year groups
- There is a large attainment gap for disadvantaged pupils, which seems to have grown

All Reading schools have received catch up premium funding from the DfE to support the most vulnerable learners over the next academic year. All local schools have catch up strategy plans in place to support their vulnerable children and young people.

2.2 Proposed Response

This proposal would provide a range of agreed and targeted supports that would be overseen potentially by BFFC that would enhance schools' abilities to tackle the 'lost learning'. In particular, the aim is to ensure that disadvantaged and vulnerable children and young people receive additional support to enable them to 'catch up' and fulfil their potential.

We know that the Head Teachers and staff know what the children in their schools need. We are proposing to invite the Head Teachers to a meeting to discuss what would be the most helpful support/resource we can provide for instance, catch up maths or English or holistic support to ensure children achieve full attendance.

The outcomes of such support would be increased attendance for those children who have been disenfranchised, reduction of persistent absence as well as improvement in key subject areas (ie maths) for those children who have 'fallen behind'. Key performance indicators can be developed once the specific offer to schools is agreed.

2.3 Identification & Reach

We are using pupil premium as a proxy indicator for disadvantage/vulnerability. We need to consider how our support/resource could reach the following numbers of children in the following schools:

Schools	Children
Primary	2288
Secondary	1691
Special Schools	148
PRU	67

The Education Endowment Foundation recommends that schools should use a tiered approach to using catch up funding to ensure maximum impact on outcomes. [The EEF guide to supporting school planning - A tiered approach to 2021.pdf](https://www.educationendowmentfoundation.org.uk) ([educationendowmentfoundation.org.uk](https://www.educationendowmentfoundation.org.uk))

2.4 Resources Required

	2021/22	2022/23
£209,700	£87,375	£122,325

2.5 Supporting Information: Appendix 2

3. Adolescent Mental Health

The mental health & emotional wellbeing of children and young people has been significantly impacted by the COVID-19 crisis. The worsening of mental health results from disruptions to access to mental health services, school closures, isolation from peers and support systems. Lockdown brought increased risks from family functioning, conflict, abuse and neglect.

3.1 Demand/Impact

- Young people are 30% to 80% more likely to experience depression or anxiety than adults due to Covid (OECD, May 2021).
- Pre-Covid 1:8 CYP had a mental health disorder; post Covid this rose to 1:6
- 5-fold increase in demand for mental health services
- Increase in suicidal ideation, self-harm, eating disorders & related risk behaviours.

3.2 Response

There is a robust early intervention offer, particularly for those children attending school. This project would be integrated with the newly formed Reconnect team, comprising YOS, Youth Workers developing new multi-agency ways of working with young people most at risk of extra familial harm. The funding would ensure additional staff to support young people ages 10-18 years using a trauma-informed, systemic approach. There are no existing services specifically for the identified children.

3.3 Identification & Reach

Data/referrals to target support at particularly vulnerable groups impacted by Covid:

- Those who are not attending school, due to emotional wellbeing or existing mental health concerns. There are no existing services specifically for targeted at this group.
- Those attending school part-time, due to emotional wellbeing or existing mental health concerns. Existing services are currently unable to meet post Covid demand and waiting lists are significant.

Reach:

- 200 children and young people per year. This includes:
 - 76 not attending school
 - 124 part-time due to emotional wellbeing issues.

3.4 Impact Targets

- Goal based measures for participating children evidence a % improvement in pre/post intervention
- Ecological measures of resilience questionnaires evidence an increase in resilience
- % reduction in post 17s requiring onward transfer to Adult services
- Decreased stress within families (Family Star)
- 30% of those not in school re-engage with education
- 40% reduction in fixed term exclusions
- 50% reduction in missing episodes, offending & risk behaviour

3.5 Resources Required September 2021 to August 2023

	2021/22	2022/23	2023/24
Staffing	115,357	203,192	86,993
Total			405,542

3.6 Supporting Information: Appendix 3

4.Children Looked After: Mental Health & Wellbeing

4.1 Demand/Impact

Our children looked after are some of the most vulnerable and disadvantaged young people. Evidence indicates that they have been disproportionately impacted by Covid and are most at risk of experiencing poor mental health and wellbeing. These children are impacted by increasing waiting lists to access CAMHS specialist support services, or at risk of entering specialist health/residential placements

- 45% of children looked after and 72% in residential care experience Mental Health & Emotional Wellbeing difficulties.
- Children looked after are over represented in the criminal justice system, over 50% in custody in England and Wales have been in care.
- Local foster carers report needing support, training and guidance

4.2 Proposed Response

Improving support for this cohort has been explored by the partnership, and informed by young people, over the last 18 months. There is an opportunity to jointly fund a co-located service, with the CCG providing 50% of required funding for dedicated CAMHS workers specifically for looked after children in Reading.

- Joint funding will provide 6.2 specialist staff to be co-located with Social Care
- Staff will provide MH assessments, interventions, training; work with CYP, foster carers and social workers.

4.3 Identification /Reach

The project will support all Children Looked After, with a tiered response according to need. The project will additionally support social workers and foster carers to promote effective meeting of needs which will contribute to placement stability

4.4 Outcomes /Impact

Target	Measure
Improved Mental & Health and wellbeing for individual children	Improved MHEW as measured by CYP goal-based outcomes Reduction in CLA in Tier 4 health /residential placements
Increased confidence & skills in Foster Carers & Staff	Training evaluations/Supervision reflects greater confidence
Placement stability	Reduction in unplanned placement changes/Reduction in 3+ placement changes
Improved personal, social & economic outcomes	<ul style="list-style-type: none"> - Improved school attendance - Reduced fixed term exclusions - Reduction in NEETs - Reduction in CLA receiving statutory YOS interventions

4.5 Reach of service

- All looked after children and young people
- Foster Carers and Social Workers

4.6 Resources Required

£194,000 per year from September 2021. Total £388,000 with matched contribution from CCG

4.7 Supporting Information Appendix 4

5.Summary of Resources Requested

	2021/22	2022/23	2023/24	Total
Project 1	197,581	345,276	146,675	689,532
Project 2	87,375	122,325		209,700
Project 3	115,357	203,192	86,993	405,542

Project 4	113,166	194,000	80,833	387,999
Total	513,479	864,793	314,501	1,692,773

Appendix 1: 0-2s

The first 1001 days, from pregnancy to age two, are an age of opportunity. This is a critically important period of rapid development that lays the foundations for later health, wellbeing and happiness.

Impact of COVID-19 and Spring 2020 lockdown on 0-2s

Pregnancy, birth, the early months and, to some extent, the first two years should be considered as an additional 'risk factor' for lockdown harms to children due to the specific needs/vulnerabilities in this age range. These can be summarised as:

- Susceptibility to the environment
- Dependency on parents
- Dependency on services
- Dependency on social support
- Invisibility to professionals.

Reductions in direct contact with most services are widely viewed to have removed key protections to many 0-2s, just when they were most needed.

Impacts of the Spring 2020 lockdown on 0-2s

The 'hidden harms' of the Spring lockdown were broad, significant and experienced unevenly. There is a wide range of emerging evidence of 'harm' to 0-2s in five broad, overlapping areas as a consequence of lockdown.

An increased likelihood of exposure to traumatic experiences

Speech by Amanda Spielman at NCASC 2020, [https://www.gov.uk/government/speeches/amanda-spielman-at\[1\]n](https://www.gov.uk/government/speeches/amanda-spielman-at[1]n) said that Children were more likely to experience neglect or come to serious physical harm

An indirect health risk from time confined indoors and reduced contact with health services

- Reduced external play, more sedentary behaviour, and disrupted sleep patterns have all been identified as lockdown trends with the potential to damage long term development. Risks from other illnesses increased as interactions with health services declined due to more limited access to provision, warnings to stay at home or parent nervousness around coming forward.
- During lockdown children presented late to emergency departments leading to delayed diagnosis and hence a delay in treatment. Reduced take-up of immunisations could have further long-term repercussions
- . Lockdown exacerbated risk factors for some types of baby loss, such as sudden unexpected death in infants (SUDI), sometimes linked to deprivation.
- After a loss, isolation has contributed to negative impacts on women and partners' mental health, and their ability to access support

Risks of harm to development from restricted social interaction

Social isolation reduced opportunities for healthy play and interaction and significantly limited valued support to parent

Risk of increased parental stress, less responsive parenting and harms to caregiving relationships.

Increased perinatal and parental anxiety and stress with potential to impact pre-birth development and posing risks to nurturing, responsive caregiving. The Babies in Lockdown survey of over 5,000 parents of 0-2s found 9/10 experienced higher anxiety during lockdown. 25% reported concern about their relationship with their baby. The impacts were particularly pronounced for some groups.

Increased likelihood of hunger or material deprivation

- Parents were more than twice as likely than non-parents to report reduced income during lockdown, with less than half able to cover a large necessary expense. They were also more likely to have been furloughed than adults without children.
- Over 20% found childcare impacted their work.
- Food poverty increased during lockdown as indicated by a reported rise in demand in foodbanks, and 'babybanks'.
- Families living in poverty were more likely to experience the impact of digital exclusion, and to have to isolate in poor and cramped living conditions.

- According to the [Babies in Lockdown report](#), produced by Best Beginnings, Home Start UK and Parent-Infant Foundation, just 1 in 10 surveyed parents with children under two saw a health visitor face-to-face during lockdown (April – June 2020). This was mirrored in Reading where health visiting moved to a virtual service and less than a third of all two-year olds had a mandated ASQ health and development check.

A national survey of childcare providers (October 2020) showed

Concern about children's personal, social and emotional development. Some children had returned less confident and more anxious. In some cases, children had also become less independent, for example returning to their setting using dummies or back in nappies having previously been toilet trained

Concern about the learning and development especially in the three prime areas of communication, physical development and personal, social and emotional development. This was of most concern amongst the following groups:

- Children with special educational needs and disabilities (SEND)
- English as an additional language
- Children living in poverty

OTHER IMPACTS

- concerns about children being neglected isolation of families, the closure of family support services (such as children's centres and parenting groups)
- children with SEND had not received the additional support they needed from other professionals because many services had closed or were limiting face-to-face visits
- Increasing delays in accessing support for speech and language therapy and paediatric appointments.



Appendix 2: School Recovery Resources

The pandemic has shown the significant quality of leadership that we have in schools across Reading. Our 'schools led' approach has resulted in some of the highest attendance rates in the country. However, we know that our schools remain concerned about the long-term impact of the lockdowns for those children who were unable to access education either face to face or virtually and those pupils who are already disadvantaged.

Impact of lockdown on education

- Sir Kevan Collins (the recently resigned Education Catch up Tsar) estimated that pupils have lost on average over 115 learning days during the pandemic and that on average children are three months behind in their learning (particularly Maths. Research shows a consistent pattern:
 - Pupils have made less academic progress compared with previous year groups
 - There is a large attainment gap for disadvantaged pupils, which seems to have grown
- Studies from National Foundation for Education Research (NFER), Department for Education and GL assessment also show a consistent impact of the first national lockdown with pupils making around 2 months less progress than similar pupils in previous years. The studies from NFER and RS assessment both show large gaps for disadvantaged pupils, which seem to have grown since the start of the pandemic.
- All current studies only measure the impact of the first national lockdown and do not consider the potential impact of subsequent national restrictions. None of the studies in England use national assessment data due to the cancellation of testing.
- Locally our schools have reported to the school standards team both problems and new opportunities as a result of the pandemic. They are noticing gaps and educational regression particularly in disadvantaged and vulnerable populations. Gaps observed are academic, emotional, physical and social.
- Schools have also identified opportunities. Some children have benefited from being in school in smaller groups during lockdown and many children (particularly at secondary) have improved their study and independent learning skills as a result of remote teaching. Most schools have seen some benefit from the use of technology and many wish to build on this to improve learning and training opportunities and gain efficiencies in communication, co-production with parents and recruitment.
- Some schools have forged closer relationships with their communities and families who have traditionally found school hard to engage with. Many schools hope to maintain and build these relationships further and continue joined up work with community leaders and organisations,

 Primary schools

School Name	Phase	Number of Pupils
Alfred Sutton Primary School	Primary	82
All Saints Church of England Aided Infant School	Primary	3
All Saints Junior	Primary	9
Battle Primary Academy	Primary	60
Caversham Park Primary School	Primary	15
Caversham Primary School	Primary	18
Christ The King Catholic Primary School	Primary	59
Churchend Primary Academy	Primary	76
Civitas Academy	Primary	18
Coley Primary School	Primary	40
E P Collier Primary School	Primary	52
Emmer Green Primary School	Primary	21
English Martyrs' Catholic Primary School	Primary	48
Geoffrey Field Infant School	Primary	45
Geoffrey Field Junior	Primary	130
Katesgrove Primary School	Primary	71
Manor Primary School	Primary	88
Meadow Park Academy	Primary	117
Micklands Primary School	Primary	69
Moorlands Primary School	Primary	133
New Christ Church CofE (VA) Primary School	Primary	37
New Town Academy	Primary	51
Oxford Road Primary School	Primary	41
Park Lane Primary School	Primary	72
Ranikhet Academy	Primary	66
Redlands Primary School	Primary	22
Southcote Primary School	Primary	63
St Anne's RC Catholic Primary School	Primary	27
St John's CofE (Aided) Primary School	Primary	50
St Martin's Catholic Primary School	Primary	8
St Mary and All Saints CofE (VA) Primary School	Primary	67
St Michael's Primary School	Primary	98
Thameside Primary School	Primary	67
The Heights Primary School	Primary	14
The Hill Primary School	Primary	23
The Palmer Primary Academy	Primary	89
The Ridgeway Primary School	Primary	113
Whitley Park Primary & Nursery School	Primary	157
Wilson Primary School	Primary	69
Primary Total		2288

Secondary schools

School Name	Phase	Number of Pupils
Blessed Hugh Faringdon Secondary School	Secondary	165
Highdown School	Secondary	163
John Madejski Academy	Secondary	255
Kendrick School	Secondary	27
Maiden Erlegh School Reading	Secondary	245
Prospect School	Secondary	355
Reading Girls' School	Secondary	162
Reading School	Secondary	36
UTC Reading	Secondary	29
WREN School	Secondary	254
Secondary Total		1691

Special schools

School Name	Phase	Number of Pupils
Hamilton School	Special	24
Thames Valley School	Special	25
The Avenue Special School	Special	78
The Holy Brook School	Special	21
Special Total		148

Pupil referral unit:

School Name	Phase	Number of Pupils
Cranbury College	PRU	67

Appendix 3: Adolescent Mental Health

The Mental health & emotional wellbeing (MHEW) of children and young people has been significantly impacted by the COVID-19 crisis locally and nationally. The worsening of mental health results from disruptions to access to mental health services, school closures, isolation from peers and support systems. Lockdown brought increased risks from family functioning, conflict, abuse and neglect. Numbers of CYP experiencing Adverse Childhood Experiences (ACEs) increased over COVID, with higher incidents of family/parental stress, domestic violence and child abuse during the lockdown period, along with reductions in family income (Lockhart and Sopp 2020; Davidge 2021). In 2017, 23.2 % of 5-16-year olds with a parent experiencing psychological distress had a probable mental disorder, compared with 8.5% of children whose parent showed no distress. In 2020 the proportion of children with a probable mental disorder increased to 30.2% for children whose parent showed psychological distress, compared with 9.3% of children whose parent showed no distress (NHSD, 2020).

The resultant increase in demand for mental health services is estimated to be at least 15% for CYP aged 5-19 (O' Shea, 2020).

CLASSIFICATION: ENTER HERE

- Anxiety and depression among adolescents are higher than pre-crisis levels and compared to other age groups. Increases in anxiety and depression were greatest in those with a pre-existing physical or mental health condition, neuro disability, SEND or disability (Young Minds 2020, NHSD 2020, Family Fund 2020, Waite 2020, Waite & Creswell, 2020).
- Young people are 30% to 80% more likely to experience depression or anxiety than adults (OECD, May 2021).
- Associated with suicidal ideation, self-harm, eating disorders & related risk behaviours.
- Children and Young People in enforced isolation/quarantine were up to 5 times more likely to require a MH service (Lockhart & Sopp, 2020)
- Since 2020, CYP with mental health issues increased with age; wellbeing reduced with school year, with those in years 12 and 13 having the greatest proportion of low wellbeing compared to other school years in June & July 2020 (NHSD, 2020).
- Local and national services report increase in referrals, particularly for eating disorders, emotional regulation and complexity of cases.
- Significant increase in mental health needs for CYP, particularly evident in boys.

<u>Before the COVID Pandemic (2017-8)</u>	<u>During the COVID Pandemic (end 2020)</u>
9.4% 5-10y olds MH disorder 5-10y boys 11.5% 11-16y 12.6% MH disorder 1 in 8 5-19 year olds have MH disorder;	14.4% 5-10y olds MH disorder; 5-10y boys 17.9% 11-16y 17.6% MH disorder 1 in 6 of 10-16 year olds MH disorder

Reading figures

Pre-Covid (4.19-3.20)

Age Range	MHEW Concern	Combined Services received (EPS, MHST, PMHT)
10-18Y		
	Anxiety	69%
	Depression	15%
	Behavioural or Conduct Concern	
	Self-Harm	7%

Post Covid (3.20-6.21)

Age Range	MHEW Concern	Percentage of referrals received (EPS, MHST, PMHT)



10-18Y	Social Emotional & Mental Health (SEMH)	35%
	Anxiety	29%
	Depression	10%
	Behavioural or Conduct Concern	7%
	Self-Harm	3%

These tables show an increase in referrals for SEMH reflecting less surety in referral information due to lockdown. However, our MHEW dashboard has changed in recording data fields since lockdown, making comparison slightly harder. In addition:

- 76 Vulnerable pupils on roll of a school but not attending school or part-time due to emotional wellbeing issues. A further 216 are open to EWS for attendance concerns.
- 156 CYP with EHCP for SEMH aged 10-18y
- 231 CYP at SEN Support for SEMH aged 10-18y
- Plus ASD 351 at SEN support, SLCN 273 at SEN
- 20 adolescents on waitlist for PMHT with a wait of up to 4 months.
- 4 on waitlist for MHST at early intervention stage.

Appendix 4: Children Looked After

<https://www.nice.org.uk/guidance/gid-ng10121/documents/draft-guideline>
<https://www.southeastclinicalnetworks.nhs.uk/children-in-care/>

Overall, looked-after children and young people have poorer outcomes in many areas compared to the general population, including mental and physical health, education, and offending rates. The pandemic was particularly detrimental for CLA CYP as the lockdown put additional pressure on families and took away the ecological sources of resilience such as schools and meeting attachment figures. The rate of mental health disorders in the general population 11 aged 5-15y is 10%. However, for those who are looked-after it is 45%, and 72% for those in residential care. 32.5% of Reading CLA identified as having EWB concerns (Fingertips PH data) which is likely to be an under-estimate. The average cost to LAs in SE England is £2.3m a week. The rate of CiC is rising in SE England and nationally. Reading has 280 CLA aged 4-19y, double our neighbouring LAs combined; we have low UASC (3.6% March 2020), in the lowest quartile in SE England.

Adversity experienced in childhood is estimated to contribute to 30% of mental health conditions in adulthood. 16% of CYP exposed to a traumatic event develop PTSD, rising to 25.2% for those experiencing an interpersonal trauma such as physical or sexual abuse/attack (Alisic et al. 2014 in Lockhart & Sopp, 2020).

Date	April 2021
Title of Paper	Berkshire West Children in Care Mental Health offer

Part 1 – Service outline

There has been discussion with CYP about what type of service they want.

There has been research of other service offers across the country

A small task and finish group of LA, BHFT and CCG officers have cowritten a service specification

Therefore, the service is being established to ensure that Children who are in care receive quicker access to mental health support through sharing information and knowledge, directly assessing the needs of CYP in care and providing interventions that meet needs where that is best for the child or young person.

The service aims to improve life chances of Children in Care, by working towards increasing these resiliency factors:

- Creating stability of the Child or Young person’s home placement
- CYP able to maintain a relationship with family members and work to be re-united where that is possible.
- Fostering as strong an attachment as possible with the CYP foster carers or adults responsible for their care (if in a residential setting)
- Reaching as high as possible Education achievements and
- Creating local social networks, forming positive and meaningful relationships with peers and other adults.

The objectives of this specific service will be to:

- Provide evidence based mental health assessments

- Use these high-quality assessments to inform multi-disciplinary care planning and inform interventions (clinical and non-clinical)
- Share knowledge, expertise, advice, and guidance to professionals (including foster carers) so more informed decisions (both small and significant in scale) are made with CYP about their lives.
- Provide training to professionals (including Foster carers) about CYP presentation of need to enable adults to identify needs earlier, respond in a knowledgeable and empathic way and be confident that as adults they are doing the right things for that CYP.
- Provide evidenced based interventions directly with CYP and foster carers that support improved outcomes.

The 4 outcomes for CYP that use the service are:

- Symptom reduction - The way that the presenting symptom impacts on the young person, for example reduce emotional distress and reduce challenging behaviours
- Positive impact on functioning - Building protective factors in the young person that enables them to manage and cope with their personal circumstances, for example Children & Young people placement stable following interventions
- A good user experience - Children and Young People, Foster/ Carers and professionals report positive experience of the service intervention for example increased knowledge and confidence that improves their care, practise and decision making.
- Improved Subjective Wellbeing– A young person reported improvement in the ability to manage difficult feeling

Part 2 – Model and finance

The service needs to be set up and work in an integrated way with local authority children’s services implementing the 'team around the worker' ethos. These are the 4 key factors:

- 1) Location: The service will be based within each of the 3 LA offices with the CiC teams but staff will be required in health offices of their employer on a regular basis
- 2) Employment: Staff and/ or Practitioners will be employed by an NHS provider as the lead of the service but as described deployed into the CIC teams.
- 3) Management: line management, HR procedures and supervision stays with the NHS provider. However, a partnership agreement or SLA between the LA and the NHS partner needs to be put in place
- 4) Governance – Oversight of this service would be by a regular steering group established between provider lead and individual LA.

The model is best delivered by a skill mix including a higher paid leadership role for each Local Authority to support the complex partnership work needed. To scope the depth of capacity required there are two factors to map against the number of CIC that will use the service in a year.

Firstly, identify the 5 types of core activities that being provided and how much time/ capacity required per patient. The table below (1) outlines the 4 key patient activities, and the final column gives a total hours per patient

Table 1

Activity Type	Duration of Intervention (months)	Sessions a month	Total Sessions
1. Consultation only	1	1	1
2. Consultation for out of area CIC	12	1 every 4 months	3
3. Consultation + Low Intensity intervention	1+ 3	3	10
4. Consultation + High Intensity	1+ 9	6	55

There is a fifth activity training that will be added at the end of the model.

Secondly to identify the number of CYP in care that require which type of activity.

In appendix 3 is the CIC data as provided from each Local Authority that this part of the model has been based upon (Wokingham & WB for Feb 21 and Reading June 20). There are a few steps in the process.

A) use 4 working assumptions to identify the number of CYP from the Jan/ Feb 21 position of 537 CYP in care.

1. Reduce number by decreasing a proportion the 0 – 4-year-old age range. Reduced the number to access the service to 513 (reduction of 24 or 25% of the 0 – 4 cohort)

Of this new total now need to identify

2. The % of CYP out of area from the remaining cohort at its lowest is 26% = **134**
3. The % of CYP that have an EWB element of care plan and therefore likely to need either high or low intensity is 49%, taken from Wok & WB feb 21 (30%) and Reading June 20 (52%) of the cohort left (minus under 5 and out of areas) = **188**
4. Expectation of a 40/60 split on this number between high/ low intervention need = 75 high /113 low

Therefore, applying these elements to the 513 we have in Table 2 below numbers per LA.

Activity Type	CYP in CiC applicable to	West Berks	Reading	Wokingham
1. Consultation only	191*	57	96	38
2. Consultation for out of area CIC	134	27	67	40

CLASSIFICATION: ENTER HERE

3. Consultation + Low Intensity intervention	113	24	74	15
4. Consultation + High Intensity	75	16	49	10
Total	513	124	286	103

*Added in consultation for all other CiC

Next need to estimate the FTE capacity required to deliver a training offer, which is outlined in table 3 below.

	Duration (hours)	Events/ month	Annual Total (hours)
Standard Training Offer	8	3	288
Complex Training Offer	4	2	96

This estimates that an additional 0.3 FTE is required by LA area.

Finally need to apply this to the sessions required over a year that provides the FTE front line capacity required (minus admin), outlined in Table 4 below.

	West Berks	Reading	Wokingham
Consultation Only in hours	114.6	191	76.4
OOA CiC in hours	160.8	402	241.2
Low Intensity in hours	482.4	1483.92	306
High Intensity in hours	1768.8	5441.04	1122
In weeks (48 to year)	53	157	36
In WTE	1.4	4.2	1.0
Add 30% for additional demand	1.8	5.4	1.3
Add in Training offer (0.3)	0.3	0.3	0.3
TOTAL FTE	2.1	5.7	1.6

As already stated, the proposal has planned a skill mix to give a full range of skills and qualities, making the final cost as effective as possible.

Table 5 below is the Health services view of the skills mix per Local Authority

NHS Banding	West Berks	Reading	Wokingham
8b	0.2	0.6	0.2
8a		1	

CLASSIFICATION: ENTER HERE

7	1	1	0.5
6	1	1.4	0.4
5		1	0.5
4		0.7	
Frontline Total	2.2*	5.7	1.6
Additional Admin	0.5	0.5	0.5
Total	2.7	6.2	2.1

*slight increase in frontline FTE (2.1 to 2.2) to enable recruitment

This enables costing per LA including non-pay and overheads to deliver this service in Table 6 below.

NHS Banding	West Berks		Reading		Wokingham	
8b	0.2	£13,359	0.6	£42,657	0.2	£13,859
8a			1	£60,135		
7	1	£53,805	1	£53,805	0.5	£27,460
6	1	£43,382	1.4	£60,735	0.4	£17,496
5			1	£34,982	0.5	£17,771
4			0.7	£21,256		
(Admin) 3	0.5	£12,724	0.5	£12,724	0.5	£13,422
Pay total		£123,297		£298,007		£90,008
Mobile, Data line costs & IT Support		£4,541		£8,325		£6,055
Rio (Clinical Records) Licence and Support		£11,679		£23,358		£16,351
Contribution to Overheads (at 17.75%)		£24,695		£58,355		£19,897
Total Service Costs		£164,212		£388,045		£132,311

Impact of Covid - Resource Request: Mental Capacity Act

Directorate:	DACHS
Name of Initiative:	Reduce people waiting for Mental Capacity Assessments to move from Appointee to Court Appointed Deputy

Please complete all sections in full

1. Overview of Initiative						
Service Area	Lead Officer		Timescales		Context & Rationale (include current position and reasoning (why now))	
Deputies team	Jo Purser		9 months		The Deputies Team currently has a backlog of 25 Mental Capacity Assessments, which are required in order to enable people to move from an appointee to Court appointed Deputy. We estimate it would take 1 worker 9 months to complete this work. While cases remain unallocated and service users unsupported, their needs may increase, thereby requiring higher-cost packages of long-term care in the future and removing the opportunity to complete preventative work at an earlier stage.	
2. Resource required and Costs <i>(insert additional rows where more than 2 posts)</i>						
Post Title	Start Date MM/YY	End Date MM/YY	Hours/ FTE	Post Salary Grade or Day Rate	Salary Cost Code	Cost (£000's)
						21/22
a. 1x Locum Social Worker	07/21	03/22	37	£259	5608-1983	49,210.00
Comments: We intend to recruit a social worker to complete the unallocated Mental Capacity Assessments, thereby reducing the volume of unallocated cases to 0.						
3. Deliverables						
Deliverables & Outcomes					Date of Delivery MM/YY	

Page 435

Recruit 1x Senior Social Worker	07/2021
Social Worker to begin reducing the number of people requiring a Mental Capacity Assessment regarding finances to move from Appointee to Court appointed Deputy, reducing the waiting list down to 0 by the end of the period	03/2022

4. Gateway Reviews *(no requirement to complete if total cost is under £20k or a post)*

Description	Progression Criteria	Date Due MM/YY
Decision as to whether to continue employing the Social Work post for the last quarter of the financial year 21/22 based on the volume of work completed in the 2 nd and 3 rd quarter, and the volume of work remaining	Reduction in MCA's & evidence of continual demand for the post.	1/12/2021

Page 436

5. Finance Endorsement

Approved by	Date Endorsed DD/MM/YY	Revenue Cost (£000's)	Capital Cost (£000's)
Strategic Business Partner	...	£49,210	N/A

6. Executive Director Endorsement

Approved by	Date Endorsed DD/MM/YY
Seona Douglas	...

Impact of Covid - Resource Request: Physiotherapist

Directorate:	DACHS
Name of Initiative:	Physiotherapist for community rehabilitation post rapid hospital discharge

Please complete all sections in full

1. Overview of Initiative						
Service Area	Lead Officer	Timescales	Context & Rationale (include current position and reasoning (why now))			
Advice and Wellbeing Hub	Jo Purser	9 months	Rapid Community Discharges from Acute and Community hospitals have created an increased requirement for enhanced physiotherapy to support people to regain their mobility. This is due to deconditioning and the fact that discharges are happening when people are still very unwell and may not be able to engage in reablement until they are physically more able. Without this resource, service users are less likely to regain their independence and more likely to require ongoing care and support, at a cost to the Council (i.e. with average residential care homes costing £880 on average per week). Based on trends within 2020/2021 and 2021/2022 to date, we estimate that over 50 people will require input from a physiotherapist throughout the remainder of the year. We currently lack sufficient physiotherapists to meet this demand.			
2. Resource required and Costs						
(insert additional rows where more than 2 posts)						
Post Title	Start Date MM/YY	End Date MM/YY	Hours/ FTE	Post Salary Grade or Day Rate	Salary Cost Code	Cost (£000's)
						21/22
b. Locum Physiotherapist	07/21	03/22	37	£300	5722-1983	£57,000
Comments: A locum Physiotherapist would work with people post-discharge, supporting them to regain their independence and minimise their long-term care needs.						

Page 437

3. Deliverables	
Deliverables & Outcomes	Date of Delivery MM/YY
Recruit 1x locum Physiotherapist	07/2021
Embed the role within the hospital discharge team and pathways	07/2021
Proactively work with approx. 50 service users, post-hospital discharge, supporting them to regain their independence.	07/2021 - 03/2022 (ongoing)

4. Gateway Reviews <i>(no requirement to complete if total cost is under £20k or a post)</i>		
Description	Progression Criteria	Date Due MM/YY
Decision as to whether to continue employing the Physiotherapist for the final quarter of the financial year 21/22 based on (a) outcomes achieved by the role during the 2 nd and 3 rd quarters, and (b) ongoing demand for the resource	Outcomes achieved through engagement of Physiotherapist Evidence of sufficient ongoing demand for the resource	1/12/2021

Page 438

5. Finance Endorsement			
Approved by	Date Endorsed DD/MM/YY	Revenue Cost (£000's)	Capital Cost (£000's)
Strategic Business Partner	...	£57k	N/A

6. Executive Director Endorsement	
Approved by	Date Endorsed DD/MM/YY
Seona Douglas	...

Impact of Covid - Resource Request: NHS Health Checks

Directorate:	DACHS
Name of Initiative:	Relaunch & expand NHS Health Checks Programme

Please complete all sections in full

1. Overview of Initiative			
Service Area	Lead Officer	Timescales	Context & Rationale (include current position and reasoning (why now))
Public Health	Chris Stannard	Q2 2021/2022 - Q1 2022/2023	<p>The NHS Health Check provides a “health MOT” to all adults in Reading (aged 40 - 74, not on a disease register) by checking for early signs of stroke, kidney disease, heart disease, type 2 diabetes or dementia and provide advice on reducing the risks.</p> <p>The programme which is delivered by general practice, was largely paused last year due to COVID-19, as was the case in many other parts of the country.</p> <p>There is now strong evidence from A recent large-scale national study which clearly shows that cardiovascular disease and COVID 19 are interconnected. There is also other evidence that shows both CVD and COVID-19 disproportionately affect the most deprived communities.</p> <p>Therefore prevention programmes which target CVD risk factors such as the NHS Health Check programme are more critical than ever in not only detecting and treating CVD risk and reducing health inequalities, but also mitigating against the severity of consequences from COVID-19.</p> <p>This is therefore an ideal opportunity to relaunch the programme in Reading, with a greater focus on people living in the most deprived communities, including those from some ethnic minority groups.</p> <p>The outcome of this would be to reduce the longer-term health impacts of the pandemic on Reading’s residents.</p>

Page 439

2. Resource required and Costs <i>(insert additional rows where more than 2 posts)</i>						
Post Title	Start Date MM/YY	End Date MM/YY	Hours/ FTE	Post Salary Grade or Day Rate	Salary Cost Code	Cost (£000's)
						21/22
Posts are not required. The costs for delivery of the targeted programme include:- <ol style="list-style-type: none"> 1. Communications and Marketing 2. Training to support roll-out 3. Payments to GPs for targeted invites 4. Payments to GPs for targeted checks completed 						<ol style="list-style-type: none"> 1. £10,000 2. £5,000 3. £10,766 4. £60,000 Gross: £85,766 (less current budget £30,000) Net funding requested: £55,766
Comments: <ul style="list-style-type: none"> • The project will aim to invite 5383 people for a health check. Assuming 50% uptake, we estimate there will be 2,500 completed targeted checks • The current health checks consume all of the current health check budget, hence in order to carry out more checks, more funding is required. • Under the proposed payment structure, universal checks cost £20 while targeted checks cost £26 (£2 per invite plus £24 per completed check) • 5,383 targeted invites @£2 per invite = £10,766 • 2,500 targeted checks completed @ £24 per check = £60,000 						
3. Deliverables						
Deliverables & Outcomes					Date of Delivery MM/YY	
Health Equity Audit and Planning, including: drafting of a contract variation; achieving maximum possible GP sign-up; roll out of training to support delivery					Q2 2021/22	
Delivery of targeted health checks					Q3 2021/22 - Q1 2022/20233 (ongoing throughout)	
Monitoring and evaluation					Q4 2021/22	
Review and proposals for future delivery					Q1 2022/23	

4. Gateway Reviews <i>(no requirement to complete if total cost is under £20k or a post)</i>		
Description	Progression Criteria	Date Due MM/YY
Review progress and amend service as required		Q3 2021/2022

5. Finance Endorsement			
Approved by	Date Endorsed DD/MM/YY	Revenue Cost (£000's)	Capital Cost (£000's)
Neil Sinclair	TBC	55,766	

6. Executive Director Endorsement	
Approved by	Date Endorsed DD/MM/YY
Seona Douglas	TBC

Impact of Covid - Resource Request: CHC Lead

Directorate:	DACHS
Name of Initiative:	CHC Resource

Please complete all sections in full

1. Overview of Initiative

Service Area	Lead Officer	Timescales	Context & Rationale (include current position and reasoning (why now))
DACHS	Lauren Rochat	1 st July 2021 - 31st March 2022	<p>CHC funding relates to an area of potential high cost for the RBC and also has implications for the residents who may be legally entitled to CHC funding as opposed to LA funding with possible financial contributions based on a financial assessment.</p> <p>Recently, 13 historic CHC dispute cases were reviewed with a CCG Lead Officer - however none were deemed eligible for full CHC funding, which was attributed to practitioners lacking understanding of the CHC framework & failing to submit the required evidence.</p> <p>This money would fund a dedicated CHC Lead who would (a) develop positive relationships with our CCG colleagues so that we are working together in the best interest of the patient/resident; (b) support practitioners to gather evidence and present cases to the CHC panel; and (c) clear the backlog of cases requiring review that may indeed be eligible for CHC funding, which in turn would support the delivery of the DACHS savings targets in 2021/2022.</p>

2. Resource required and Costs

(insert additional rows where more than 2 posts)

Post Title	Start Date MM/YY	End Date MM/YY	Hours / FTE	Post Salary Grade or Day Rate	Salary Cost Code	Cost (£000's)
						21/22

c. CHC Lead	07/21	03/22	37	£350 - £450 / day estimate	5289	Up to £86,850 (assuming 193 working days at the higher end of the day rate)
-------------	-------	-------	----	----------------------------	------	---

Comments:

3. Deliverables

Deliverables & Outcomes	Date of Delivery MM/YY
Support practitioner's current caseloads where CHC checklists have been positive	07/21
Take on the role of MDT representative for CHC DST meetings	07/21
Provision of bespoke training to all frontline staff & monthly CHC surgeries	09/21
Establish positive working relationships with CCG colleagues	08/21 and on-going
Take on the role for RBC at the CHC Independent Review Panels - monthly	08/21 and on-going
Staff to review of all overdue nursing home placements - Lead to offer support and expert advice	12/21

4. Gateway Reviews *(no requirement to complete if total cost is under £20k or a post)*

Description	Progression Criteria	Date Due MM/YY
N/A	N/A	N/A

5. Finance Endorsement

Approved by	Date Endorsed DD/MM/YY	Revenue Cost	Capital Cost (£000's)
Strategic Business Partner	...	Up to £86,850	N/A

6. Executive Director Endorsement	
Approved by	Date Endorsed DD/MM/YY
Seona Douglas	...

Impact of Covid - Resource Request: Quality Assurance

Directorate:	DACHS
Name of Initiative:	Commissioning Quality Assurance

Please complete all sections in full

1. Overview of Initiative						
Service Area	Lead Officer	Timescales	Context & Rationale (include current position and reasoning (why now))			
Commissioning	Lyndsey Storey	Q3 - Q4 21/22 (October 21 - March 22)	The Commissioning Team are currently being asked to respond to a very high level of quality concerns (many of which have arisen as a result of implications from Covid-19) and lack capacity to respond swiftly to all of the concerns. As such, this funding would increase capacity within the Commissioning Team with a view to ensuring that (a) these concerns can be responded to rapidly, and (b) the quality assurance function can shift back to a preventative model rather than reactive model with the financial year 21/22, while sustainable longer-term arrangements are made for embedding this approach to quality assurance.			
2. Resource required and Costs <i>(insert additional rows where more than 2 posts)</i>						
Post Title	Start Date MM/YY	End Date MM/YY	Hours/ FTE	Day Rate	Salary Cost Code	Cost
						21/22
d. 1x locum Commissioning Officer	01/10/21	31/03/22	37	£350	5289	£44,450 (assuming 127 working days)
Comments: This is based on the assumption that a locum Commissioning Officer would be in post at a day rate of £350 which we understand to be the market average. Please note that this role would deliver quality assurance work alongside existing members within the Commissioning Team.						

Page 4/5

3. Deliverables	
Deliverables & Outcomes	Date of Delivery MM/YY
Deliver a refreshed quality & risk register for the entire market, outlining a proactive schedule of quality monitoring visits for the market as a whole.	October 2021
Undertake - and complete the associated follow-on work - proactive quality visits for those providers who score highest on the risk register through the remainder of 21/22.	November 2021 - March 2022
Support the Senior Commissioner for this service area with delivering timely and accurate updates to the Quality Board.	November 2021 - March 2022

4. Gateway Reviews <i>(no requirement to complete if total cost is under £20k or a post)</i>		
Description	Progression Criteria	Date Due MM/YY
N/A	N/A	N/A

5. Finance Endorsement			
Approved by	Date Endorsed DD/MM/YY	Revenue Cost	Capital Cost (£000's)
Neil Sinclair	TBC	£44,450	N/A

6. Executive Director Endorsement	
Approved by	Date Endorsed DD/MM/YY
Seona Douglas	TBC

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

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank