

APPENDIX 3: LOCAL PLAN REVIEW DOCUMENT

REVIEW OF THE READING BOROUGH LOCAL PLAN 2019

March 2023

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1. Introduction

- 1.1 Local planning authorities are required to undertake a review of their local plans within five years of adoption. This requirement is set out in legislation¹. The review is to establish whether the plan needs updating. If the plan does require updating, those updates need to be undertaken through the relevant local plan process set out in legislation.
- 1.2 The Reading Borough Local Plan was adopted on 4th November 2019. This means that a review must have been completed by 4th November 2024. It does not mean that an updated plan needs to have been adopted by that time, although it would be helpful to have progressed any update to avoid reliance on policies that are potentially out of date.
- 1.3 The purpose of this document is therefore to assess whether an update of the Reading Borough Local Plan is required. An update could involve an update of the entire plan, or a partial update of one or more policies. This document therefore considers each individual policy in terms of the need for an update, as well as the vision, objectives and overall strategy.
- 1.4 There are a number of reasons that an update of all or part of the plan may be necessary, and these will be considered in overall terms and in relation to each individual policy. These can be summarised as follows:
 - Legislative changes: Changes to the law may result in the need to amend policies. For instance, changes to planning use classes may affect how policies are applied.
 - National policy changes: The Local Plan 2019 was examined against the 2012 version of the National Planning Policy Framework. Since that time, there have been three further versions of the NPPF, with the most recent being that published on 20th July 2021. Planning Practice Guidance has also changed in that time, most particularly in relation to the approach to housing need.
 - Other policy changes: Other policy changes include the publication of new local policies such as the Climate Emergency Strategy in 2020, and progress made on local plans in adjoining areas, including issues of unmet needs. A full list is included in Appendix 1.
 - Monitoring data: The Council monitors the indicators in section 11 of the Local Plan (as well as others) on an annual basis and collates these within its Annual Monitoring Report published in December each year. This provides an easy reference point about how policies are being applied and what effect they are having.
 - Appeals: A number of appeals have been decided since the Local Plan was adopted in 2019, and these may often give an indication of whether or not a policy requires amendment, for instance if appeal decisions regularly conflict

¹ Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

with a policy approach or reveal confusion about specific wording. Appeals decided up until mid February 2023 have been taken into account here.

- Other changes in circumstances: There are a wide variety of changes that could fit within this category. These include physical changes on the ground, such as a specific development or important piece of infrastructure. They might also include socio-economic changes within the local area, with knock-on impacts on viability, or increased strain on particular services or facilities.

- 1.5 In many cases, the relevant time period to examine changes is from the beginning of April 2018. The Local Plan was submitted at the end of March 2018, and this was therefore the last point that the Council had a free hand in amending the document. Amendments after this point needed to take the form of main modifications recommended by the Inspector. Therefore, any changes in circumstances after 1st April 2018 may have implications for policies within the plan, and it makes sense to use this date rather than the adoption date of 4th November 2019.

2. Review of overall strategy

- 2.1 The overall strategy of the document, including the vision (section 2.1), objectives (section 2.2) and spatial strategy (section 3.2) set the overall framework for the plan, and it may be that updates to this overall strategy are required. This is considered below.

Legislative changes

- 2.2 The main legislative change that is of relevance to the overall strategy relates to the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPIR 2019). As discussed elsewhere in relation to policy OU2, these changes led to an extension of the Detailed Emergency Planning Zone (DEPZ) around the Atomic Weapons Establishment (AWE) Burghfield, which in turn led to the proposal for a garden settlement including 15,000 homes at Grazeley being removed from the respective Local Plans for Wokingham and West Berkshire. This proposal is no longer considered to be deliverable and is not in alignment with policy of neighbouring authorities, and as such the Grazeley proposal would need to be removed from the overall strategy.

National policy changes

- 2.3 The national policy change that is likely to have the greatest implications for spatial planning in Reading is in terms of how housing need is calculated. This is explored in much more depth in relation to policy H1, but use of the standard methodology as it exists and as it is proposed to be continued would result in significantly higher levels of development need for Reading. Accommodating this need may well need changes to the overall spatial strategy, although it should be noted that options for sites to accommodate need remain very limited.
- 2.4 Associated with this is the increasing national policy emphasis on developing at higher densities in areas with particular accessibility by public transport, in particular city and town centres. This is both explicitly set out within national policy in its own right and also informs the methodology for calculating housing need in the form of the 35% urban uplift that applies to the 20 largest urban areas including Reading. In general, the current spatial strategy is very much in line with this approach, and it is therefore unlikely to require a particular change to the strategy.
- 2.5 It is also worth noting that the NPPF is now more explicit about the need for strategic policies to be set over a minimum 15-year timeframe, whereas the 2012 version against which the plan was examined said that the period should ‘preferably’ be 15 years. As this is a five-yearly review, it is expected to be necessary to extend the end date of the plan period from 2036 to 2041.

Other policy changes

- 2.6 A new version of the Council’s Corporate Plan covering the period 2022-25 has been published. Its vision is to “help Reading realise its potential and to ensure that everyone who lives and works here can share the benefits of its success”. There

are three themes to achieving this vision - healthy environment, thriving communities and inclusive economy.

- 2.7 In terms of healthy environment, the plan highlights the work being undertaken to work towards a carbon neutral Reading by 2030. It highlights the need for a clean, safe town that is easy to travel around, and the impact that a healthy environment can have on physical and mental health. The importance of active travel and improving parks and open spaces are referenced.
- 2.8 The theme relating to thriving communities highlights matters including the importance of access to good quality affordable housing, with the initiative to build 300 good quality affordable homes over the next four years of particular relevance, and of achieving good levels of community safety. It also highlights the importance of addressing the needs of the most excluded and vulnerable people in the community. Issues related to training and skills are also highlighted.
- 2.9 In relation to the inclusive economy, the plan notes the importance of recovery from the Covid-19 pandemic. It notes that Reading will build on its cultural heritage to enhance the tourist experience. Enhancing education, skills and training opportunities is also vital, as is delivering infrastructure to keep Reading at the forefront of advancing technologies.
- 2.10 There is nothing in the Corporate Plan that indicates that the overall strategy of the Local Plan is in particular need of update, as the priorities align with the plan's overall vision and strategy.
- 2.11 The Reading Climate Emergency Strategy, published in 2020, identifies a number of actions across a number of partners to address the climate emergency. This includes an action (E19) to consider investment in land and sites in and outside of Reading that have potential to supply renewable electricity. Other than hydropower at site CR14m, the Local Plan does not currently identify any sites, so any review should include identifying any suitable sites that have arisen from this action.
- 2.12 Action T1 is to ensure that services, leisure facilities and employment opportunities are located close to where people live and/or in locations easy to access by sustainable transport services via planning policy and decisions. This has been a central matter in the existing Local Plan and will continue to be throughout the update.
- 2.13 The Thames Valley Berkshire Recovery and Renewal Plan, published in 2020, emphasises the need for investment in town centre regeneration to drive economic renewal, in part by reimagining town centres as business and leisure hubs. It also highlights the vital nature of investment in connectivity as part of the strategy. The Plan in general is consistent with the overall strategy of the Local Plan.
- 2.14 The Wokingham Local Plan Update went through consultation on a full draft between February and April 2020, and there was a subsequent consultation on a Revised Growth Strategy which related primarily to the overall spatial strategy between November 2021 and January 2022. Under the most recent consultation

approach, the focus of growth continues to be on a number of Strategic Development Locations (SDLs). Most of these are a continuation of those in the existing development plan, but the main additional location for growth, expected to be Grazeley at the time the Reading Borough Local Plan was prepared, is now proposed to be changed to the Hall Farm/Loddon Valley area adjoining the South Eastern boundary of the Reading urban area. The proposal for significant growth at Grazeley is referenced within Reading's spatial strategy, and this change, albeit not yet adopted, would indicate a need to update the strategy.

- 2.15 The West Berkshire Local Plan Review to 2039 went through consultation on a proposed submission version between January and March 2023. Within this document, the main spatial focus for growth is on Newbury and Thatcham, and significant levels of growth in the vicinity of Reading are not proposed. Development in the Eastern Area is very limited in scale and most of the sites identified in close proximity to Reading are carried forward from the existing adopted plan. As for Wokingham, there is no expectation of development on the West Berkshire part of Grazeley, and nor is there any endorsement of development in the location to the south west of Reading identified in Figure 3.2, the Spatial Strategy, of the Local Plan. The references in the Spatial Strategy are therefore out of date and require updating.

Monitoring data

- 2.16 The Annual Monitoring Report reports on the amount of development taking place in each part of Reading and compares it to the amount of development anticipated in each part within the spatial strategy.
- 2.17 In Central Reading, the spatial strategy plans for around 7,600 homes (330 per year), 71,000 sq m of offices and up to 27,000 sq m of retail and related uses. Between 2013 and 2022, 2,422 dwellings had been completed in central Reading (averaging 269 per year), which is somewhat behind the rate needed to deliver 7,600 by 2036, but not so far behind that it calls the deliverability of the strategy into serious doubt. However, there have been net losses of both office (-64,331 sq m) and retail and related uses (-36,792 sq m) over the period, which makes it considerably more difficult to achieve this part of the strategy.
- 2.18 For South Reading, the strategy expects around 3,700 homes to be delivered over the plan period (161 per year) along with approximately 155,000 sq m of industrial and warehouse floorspace. Between 2013 and 2022, 1,552 homes had been delivered (averaging 172 per year), which is on track to fulfil the expectations for the area. For industrial and warehouse space, 24,656 sq m had been completed, which is behind the rate necessary to deliver the expectation, although it is worth noting that the vast majority is expected to be within a single allocated site, SR1, and is not expected therefore to be delivered at a steady rate across the plan period, so this does not necessarily reflect a particular issue.
- 2.19 In West Reading and Tilehurst, the strategy expects around 2,400 homes to be delivered over the plan period (104 per year). In the period 2013 to 2022, 1,257 had so far been completed (averaging 140 per year), which is on track to achieve the expectation.

- 2.20 In Caversham and Emmer Green, around 700 homes (30 per year) would be expected under the spatial strategy. In the period 2013 to 2022, 124 have so far been completed (an average of 14 per year), which is behind the rate needed to achieve what the spatial strategy expects.
- 2.21 For East Reading, the expectation is that there will be 1,100 homes over the plan period (48 per year). So far, between 2013 and 2022, 481 homes had been completed at a rate of 53 per year, on track to meet this expectation.
- 2.22 In overall terms, for housing, the delivery so far is not so different from the expectations under the spatial strategy that it indicates a need to update it. There are issues with the delivery of office and retail floorspace in particular, although this is a Borough-wide issue rather than relating to the spatial location of development.

Appeals

- 2.23 There have been no appeal decisions that call the overall strategy of the plan into question.

Other changes in circumstances

- 2.24 Results of the 2021 Census have started to be published on key matters, and it is worth considering whether these point to the need to update the overall strategy. The headlines are set out below:
- The number of usual residents in Reading Borough has increased by around 12% since 2011, rising from 155,698 to 174,224;
 - The number of households has increased by around 8%, rising from 62,869 to 67,683;
 - As the rate of population increase has exceeded the rate of increase in households, it is apparent that average household size has increased, from 2.48 to 2.57;
 - There has been a shift in tenure from owner occupation towards private renting, with owner occupiers (with or without a mortgage or loan) representing 54.8% of households compared to 50.4% in 2011, whilst the proportion of private renting households increased from 26.1% to 31.9%;
 - The number of children aged 0-17 has increased by around 9% from 33,395 to 36,438, which results in children forming a slightly lower percentage of the overall population (20.9% in 2021 as opposed to 21.4% in 2011);
 - The number of people aged 65 or more has increased by around 18% from 17,832 to 20,981, which increases the proportion of the population in this age group from 11.5% to 12.0%;
 - The way that economic activity rates are reported has changed between 2011 and 2021, with 2021 results reported as a proportion of all residents over 16 compared to residents between 16 and 74 in 2011, meaning that figures are not comparable. However, what can be seen is that total number of economically active residents has increased by around 4%, a much smaller

proportionate increase than the total population, which points towards decreasing economic activity rates;

- The number of full-time students as a subset of the economic activity data has increased from 15,122 in 2011 to 16,417 in 2021. These are not strictly comparable due to the change in whether people of over 74 are included (see above) but this is unlikely to make a significant difference to the student numbers;
- The proportion of households with no access to a car or van remains at a very similar level, at 28.4% in 2021 compared to 28.3% in 2011, but has increased in absolute terms from 17,832 to 20,981 households;
- Although the total number of people with no qualifications has increased from 21,834 to 22,361, this has decreased as a proportion of the overall population, from 17.4% to 15.8%. Other census data on qualifications is not comparable between 2011 and 2021 due to changes in how it is reported;
- Perhaps unsurprisingly given the situation in 2021, the number of people working mainly from home has exploded, from 6,999 in 2011 (8.8% of the working age population) to 34,950 in 2021 (39.3%). It is not clear how much of this will be retained in longer-term post-Covid patterns;
- Regarding distance that Reading residents travel to work, excluding those who work at home, the overall pattern remains relatively similar to 2011, with close to 50% of people who travel to work travelling less than 5 km. However, there has been a significant increase in those who work offshore, in no fixed location or outside the UK, from 8.7% to 20.1%, which may also be an effect of the pandemic;
- In terms of method of travel to work for Reading residents, excluding those who work at home, the most significant change is a drop in the proportion of residents who travel by train, from 10.2% to 4.5%, with train travel likely struggling most to recover from the effects of the pandemic. Travel by car or van, either as a driver or passenger, has increased from 53.9% to 57.2%. Again, it remains to be seen to what extent these issues will continue long-term.

- 2.25 Many of the changes that can be seen in the Census results were anticipated at the time the plan was prepared. The growth in the number and proportion of older people was a widely known trend that was factored into the Strategic Housing Market Assessment, and this has predictable impacts on economic activity rates. Other changes were not anticipated at the time, such as the vast expansion of working from home and associated changes to travel patterns as a result of the pandemic, although there is not yet clarity on the degree to which these changes are permanent and should form the basis for future planning. In terms of the impacts of the pandemic on employment floorspace requirements, this is something that will need further investigation in updating policy EM1.
- 2.26 There is little within the Census results that would indicate that the overall spatial strategy of concentration on Central Reading and accessible parts of South Reading

is no longer the appropriate approach, particularly since this remains the main source of sites.

Conclusion

- 2.27 It is not considered that any of the changes outlined above require any updates to either the vision or objectives of the Local Plan. However, the spatial strategy does require update, particularly for the following reasons:
- To accommodate any changes to the level of development needed in Reading, including to the extended end date of 2041; and
 - To take account of changes in the plans of neighbouring authorities, including as a result of changes in legislation affecting AWE Burghfield, to remove references to potential developments that are no longer proposed or deliverable.

3. Review of policies

- 3.1 This section takes each policy in the Local Plan in turn and considers whether there are any reasons that it should be updated. It considers legislative changes, national policy changes, other policy changes, monitoring data, appeal decisions and any other changes in circumstances. This allows the scope of the Local Plan update to be identified.
- 3.2 It should be noted that the below assessment identifies the need for an update to be considered. It does not necessarily represent a firm commitment that a policy will be amended, if further work reveals that such an amendment is not necessary. Nor does it exclude policies being brought within the scope of the update further into the process where circumstances change or where the update process reveals a further need for amendments.

CC1: Presumption in Favour of Sustainable Development

- 3.3 This policy aims to ensure that the presumption in favour of sustainable development set out in the NPPF is reflected in the Local Plan.

Legislative changes

- 3.4 There have been no legislative changes that affect this policy.

National policy changes

- 3.5 The presumption in favour of sustainable development stems from the NPPF, which has changed several times since the policy was initially drafted. Although the plan was examined against the 2012 version of the NPPF, the Inspector recommended main modifications for this policy to take account of the 2019 version, which were incorporated into the adopted version. The only significant change between the 2019 and 2021 versions is in relation to paragraph 11 (a). This relates to plan-making generally, and does not impact the wording of this policy in particular. Although the reference in the supporting text to the NPPF needs amending, this does not impact the soundness of the policy, and there is no need to update the policy.

Other policy changes

- 3.6 There have been no other policy changes that affect this policy.

Monitoring data

- 3.7 There is no monitoring data associated with this policy.

Appeals

- 3.8 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.9 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.10 No changes have been identified that result in the need to update policy CC1.

CC2: Sustainable Design and Construction

- 3.11 This policy sets out the expectations for the sustainability of developments. In particular it sets requirements for meeting high BREAAAM standards for non-residential developments and conversions to residential (new-build residential is dealt with in H5) and water conservation measures.

Legislative changes

- 3.12 From 15th June 2022, new building regulations are in effect that have improved the performance of new non-domestic buildings. Improvements to Part L of the Building Regulations result in an average 27% improvement in carbon emissions compared to previous standards. The improvement for new dwellings, as set out in relation to policy H5, would be 31%.
- 3.13 The changes to Part L represent a step on the way towards the Future Buildings Standard, which is expected to be introduced in 2025, and is to see further reductions in carbon emissions. This will cover non-domestic properties, and is in parallel to the Future Homes Standard that covers new homes and is discussed in relation to policy H5. A technical consultation on the Future Buildings Standard is due to take place during 2023.
- 3.14 The June 2022 changes together with the Future Buildings Standard are likely to have a considerable overlap with the wider BREEAM requirements within policy CC2. There is now a need to consider how the existing and proposed Building Regulations amendments influence changes to policy CC2, particularly as more information becomes available on the Future Buildings Standard.

National policy changes

- 3.15 The sections of national policy on climate change have evolved over time, but potentially of greatest significance is that the clause in the 2012 NPPF that “*when setting any local requirement for a building’s sustainability, do so in a way consistent with the Government’s zero carbon buildings policy and adopt nationally described standards*” is no longer in national policy. National policy has therefore opened up more to the possibility of local authorities setting their own sustainability standards, which is something that should be considered within an update to the policy.
- 3.16 It is also worth noting that the need for plan-making to ensure a sustainable pattern of development that, among other priorities, seeks to mitigate climate change and adapt to its effects, is now included within the presumption in favour of sustainable development, which is the ‘golden thread’ running through the NPPF, meaning that the importance of climate change is accorded even greater significance.

Other policy changes

- 3.17 The Reading Climate Emergency Strategy, published in 2020, identifies a number of actions across a number of partners to address the climate emergency. This includes an action (E2) to introduce high standards of energy efficiency for new development, including large commercial to BREEAM 'excellent' standard with best methods employed. This is already addressed through policy CC2.
- 3.18 There is also an action (W6) to investigate whether the Sustainable Planning Document can be modified to include 'water neutrality' as a planning requirement, including firstly a requirement for all new major developments to contribute to funding water saving measures equivalent to the development's water consumption and adopting the 'fittings approach' within Building Regulations rather than a 'pcc' calculation approach. As this would be a policy alteration, it is best considered through the Local Plan review than an SPD, and it indicates a need to consider updates to this policy.
- 3.19 Another action (W16) is to investigate opportunities for green roofs with regard to mitigating flood risk. There are existing references within the Local Plan to the importance of green roofs for this purpose, and there is no need to a substantial policy update, as the existing references give sufficient basis for more detailed policy to be developed if necessary.
- 3.20 Action N20 is to use green infrastructure including green walls, green roofs and planting to reduce carbon emissions and promote urban cooling. Policy CC3 is very much in line with this action, although more detail will potentially be required through an SPD, expected to be the Biodiversity and Natural Environment SPD.
- 3.21 A Sustainable Design and Construction SPD was adopted in December 2019. However, the contents of the SPD follow on from the policy approach in CC2 (and other policies) and this does not lead to a need to update the policy.

Monitoring data

- 3.22 For permissions granted for major new-build non-residential developments since the Local Plan was adopted in November 2019, 204,855 sq m of the 367,408 sq m permitted (56%) was permitted at BREEAM Excellent standard. The vast majority of the development that was not permitted to this standard was as part of applications where there had been a resolution to grant prior to adoption of the plan, but the permission had been issued after adoption with signature of the Section 106 agreement. As such it is not considered that this represents a reason to update the plan.
- 3.23 More generally, 56 of the 83 major permissions granted between 1st April 2018 and 31st March 2022 (67%) were granted with conditions requiring compliance with a particular standard of sustainable design and construction. Where such conditions were not applied it was often because of the form of the permission, such as for changes of use without physical alterations, development affecting land rather than buildings, temporary permissions or outline applications.

Appeals

- 3.24 The policy has been of relevance to two appeals since adoption of the Local Plan, with, in both cases, the Inspector agreeing not to apply the policy due to, in one case, the limited extent of physical changes and, in the other case, the difficulties of achieving the standards in an unheated maintenance building. The supporting text to the policy (as well as the SPD) recognises that there may be cases where it is more difficult to achieve the policy targets in which case the highest possible standard should be achieved. However, an update could ensure that this element is incorporated within the policy.

Other changes in circumstances

- 3.25 There are no other changes in circumstances that affect this policy.

Conclusion

- 3.26 Policy CC2 should be subject to update due to:
- Forthcoming changes to the Building Regulations;
 - Actions within the Climate Emergency Strategy that should be considered for incorporation; and
 - The need to incorporate within the policy that where the requirements cannot be met the highest standards should be achieved.

CC3: Adaptation to Climate Change

- 3.27 This policy aims to ensure that new developments adapt to the effects of climate change, for instance through orientation, shading, ventilation, planting and drainage.

Legislative changes

- 3.28 There have been no legislative changes that affect this policy.

National policy changes

- 3.29 The need for plan-making to ensure a sustainable pattern of development that, among other priorities, seeks to mitigate climate change and adapt to its effects, is now included within the presumption in favour of sustainable development, which is the ‘golden thread’ running through the NPPF, meaning that adapting to climate change is accorded greater significance.

Other policy changes

- 3.30 The Reading Climate Emergency Strategy, published in 2020, identifies a number of actions across a number of partners to address the climate emergency. This includes an action (N20) to use green infrastructure including green walls, green roofs and planting to reduce carbon emissions and promote urban cooling. Policy CC3 is very much in line with this action, although more detail will potentially be required through an SPD, expected to be the Biodiversity and Natural Environment SPD.

- 3.31 A Sustainable Design and Construction SPD was adopted in December 2019. However, the contents of the SPD follow on from the policy approach in CC3 (and other policies) and this does not lead to a need to update the policy.
- 3.32 The Reading Climate Change Adaptation Plan was published in December 2019. This is not a detailed action plan, but rather sets out the key impacts risks and opportunities for adaptation in Reading. It recommends the following areas of work that are necessary in progressing to a full Adaptation Plan
- To establish clear governance and implementation arrangements for the plan;
 - To identify the most relevant communication tools and channels to support the partnership and capacity-building aspects of the plan, and to foster interest and wider buy-in;
 - To identify the higher risk spots in the town;
 - To produce accessible forms of Reading-specific climate change scenario information; and
 - To coordinate deep-dive case studies for organisations or sites within the town and to facilitate sharing of insights and collaborative working on overlapping challenges and solutions.

Monitoring data

- 3.33 There is no monitoring data associated with this policy.

Appeals

- 3.34 This policy has been relevant to two appeal decisions since the plan was adopted and has been supported.

Other changes in circumstances

- 3.35 There are no other changes in circumstances that affect the need to update this policy.

Conclusion

- 3.36 Policy CC3 should be subject to update due to:
- The publication of the Climate Change Adaptation Plan and the possibility that strategies will continue to evolve during the Local Plan production process.

CC4: Decentralised Energy

- 3.37 This policy aims to ensure that opportunities for decentralised energy within major developments are identified and incorporated where possible, either through new provision or allowance for connection to an existing or future network.

Legislative changes

- 3.38 There have been no legislative changes that affect this policy.

National policy changes

- 3.39 There have been no national policy changes that result in the need to update this policy.

Other policy changes

- 3.40 The Reading Climate Emergency Strategy, published in 2020, identifies a number of actions across a number of partners to address the climate emergency. This includes an action (E11) to work with developers to maximise district energy solutions in line with the Local Plan policies on decentralised energy, including establishing district heat, investigating the potential of rivers, ground and aquifers in Reading for renewable heat and implementing heat pump schemes.
- 3.41 A Sustainable Design and Construction SPD was adopted in December 2019. However, the contents of the SPD follow on from the policy approach in CC4 (and other policies) and this does not lead to a need to update the policy.

Monitoring data

- 3.42 There is no monitoring data associated with this policy.

Appeals

- 3.43 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.44 Although work has been undertaken on identifying options for district heat networks in the town centre, this has not yet progressed to the establishment of such networks. This is an evolving issue and the policy should be considered for update to ensure that it is as robust and up-to-date as possible.

Conclusion

- 3.45 Policy CC4 should be subject to update due to:
- Actions within the Climate Emergency Strategy that should be considered for incorporation; and
 - To incorporate further progress on establishing district heat networks.

CC5: Waste Minimisation and Storage

- 3.46 This policy aims to minimise the generation of waste, promote more sustainable approaches to waste management and provide space for waste storage, reuse, recycling and composting within designs.

Legislative changes

- 3.47 There have been no legislative changes that affect this policy.

National policy changes

- 3.48 There have been no national policy changes that result in the need to update this policy.

Other policy changes

- 3.49 There have been no other policy changes that affect this policy.

Monitoring data

- 3.50 There is no monitoring data associated with this policy.

Appeals

- 3.51 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.52 There have been no other changes in circumstances that affect this policy

Conclusion

- 3.53 No changes have been identified that result in the need to update policy CC5.

CC6: Accessibility and the Intensity of Development

- 3.54 This policy aims to match the scale and density of development to its level of accessibility by walking, cycling and public transport to services and facilities.

Legislative changes

- 3.55 There have been no legislative changes that affect this policy.

National policy changes

- 3.56 There is now a section 11 in the NPPF that relates to making efficient use of land. Parts of this section are made up of text that were in the 2012 version but in other sections, whilst other aspects of the section are new, but the purpose overall is to emphasise the need to make efficient use of land. The elements on building at appropriate densities highlight that the appropriate densities should include the scope to promote sustainable travel modes that limit future car use, which is in line with the policy, but it also includes a variety of other considerations. It is not cons

Other policy changes

- 3.57 There have been no other policy changes that affect this policy.

Monitoring data

- 3.58 There is no monitoring data associated with this policy.

Appeals

- 3.59 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.60 There have been no other changes in circumstances that affect this policy

Conclusion

- 3.61 No changes have been identified that result in the need to update policy CC6.

CC7: Design and the Public Realm

- 3.62 This policy sets out expectations for the design of all developments and the contribution that development makes to meeting urban design objectives.

Legislative changes

- 3.63 There have been no legislative changes that affect this policy as yet. However, the Levelling-Up and Regeneration Bill would have the effect of introducing a statutory requirement for a local planning authority to have a design code in place for their whole area, as set out in 15F of the Bill. This would place the NPPF requirement to have design codes in place on a statutory footing. The Bill is currently at the report stage in the House of Commons.

National policy changes

- 3.64 National planning policy on design has seen a number of important changes since the Local Plan was prepared.
- 3.65 The NPPF now states that plans should set out a clear design vision for the area, which is a subtle change from the 2012 NPPF which was somewhat more reactive in nature. It is also now stated that these design approaches should be developed with local communities reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Another important change is the references to achieving beauty, which is now referenced in several places in the NPPF including the principles of sustainable development.
- 3.66 The NPPF also now contains a requirement for local authorities to prepare design guides or codes. The scope and geographical coverage is for an authority to decide, but they should set clear expectations for design expectations. They can be included within a local plan or as supplementary planning documents. It is not likely that a design code covering Reading, reflecting local aspirations for the area, can be incorporated into a partial update of the Local Plan, but it would need to follow as a supplementary document, meaning that the overall design policy should include the necessary high-level strategic direction.
- 3.67 Since the Local Plan was prepared, the National Design Guide and the National Model Design Code were published in 2021. The NPPF specifies that design codes should be consistent with the principles in these documents, and that, in the absence of local design codes, they should be used to guide decisions on

applications. Of these, the National Design Guide will be of greatest relevance to policy CC7 because the National Model Design Code deals with the main principles around the approach to design. It identifies ten characteristics of a well-designed place as follows:

- Context;
- Identity;
- Built form;
- Movement;
- Nature;
- Public spaces;
- Uses;
- Homes and buildings;
- Resources; and
- Lifespan.

- 3.68 Policy CC7 is structured in a different way that stemmed in particular from previous national guidance. Whilst the content is not considered to particularly conflict with the new guidance, it is nevertheless likely that amending CC7 to link to the National Design Guide and its key characteristics would be helpful to ensure both that it fully complies and that it can link better to future design codes which need to take the Guide and the National Model Design Code into account.

Other policy changes

- 3.69 The Council's All-Age Autism Strategy 2022-26 was produced in 2023. It identifies the importance of incorporating neurodivergence within the built environment. It includes an ambition of embedding a *“greater understanding of how neurodivergent people experience the built environment in different ways, and how choices made within streets and spaces may affect people differently”*. An action is included within the strategy to *“Take account of best practice guidance in developing policies for the built environment including the Local Plan Review and Public Realm Strategy”*. Whilst some of the implications will be for inclusion within more detailed SPD documents, policy CC7 should be updated to ensure that it provides an adequate policy basis.

Monitoring data

- 3.70 There is no monitoring data associated with this policy.

Appeals

- 3.71 This has been the most commonly referenced policy in appeal decisions since the adoption of the Local Plan, being a factor in 47 appeals. In general, the appeal decisions have been supportive of the Council's position, and even where they have not been this has been down to a difference of opinion on how the proposal aligns with the policy. There are no clear reasons to amend the policy resulting from appeal decisions.

Other changes in circumstances

- 3.72 There have been no other changes in circumstances that affect this policy

Conclusion

- 3.73 Policy CC7 should be subject to update due to:
- The need to link to future production of design codes;
 - Changes in national policy including the National Design Guide and the National Model Design Code;
 - Changes in local policy such as the All-Age Autism Strategy.

CC8: Safeguarding Amenity

- 3.74 This policy aims to ensure that residents in the vicinity of a development, or residents within a development, are not subject to a poor level of residential amenity in terms of matters such as privacy, sunlight and daylight, overbearing, outlook, noise, artificial lighting, vibration, dust and fumes, smell, crime and safety and wind.

Legislative changes

- 3.75 There have been no legislative changes that affect this policy.

National policy changes

- 3.76 There have been no national policy changes that result in the need to update this policy.

Other policy changes

- 3.77 There have been no other policy changes that affect this policy.

Monitoring data

- 3.78 There is no monitoring data associated with this policy.

Appeals

- 3.79 This has been the second most commonly referenced policy in appeal decisions since the adoption of the Local Plan, being a factor in 38 appeals. In general, the appeal decisions have been supportive of the Council's position, and even where they have not been this has been down to a difference of opinion on how the proposal aligns with the policy. There are no clear reasons to amend the policy resulting from appeal decisions.

Other changes in circumstances

- 3.80 There have been no other changes in circumstances which affect this policy, which generally sets out well-established planning principles.

Conclusion

- 3.81 No changes have been identified that result in the need to update policy CC8.

CC9: Securing Infrastructure

- 3.82 This policy aims to ensure that, where a development causes impacts on the need for infrastructure, this is addressed through direct provision or financial contribution by the development. It also prioritises the provision of transport, open space, education and economic development infrastructure.

Legislative changes

- 3.83 Legislation around securing infrastructure through planning obligations and the Community Infrastructure Levy (CIL) has continued to evolve, with the CIL Regulations subject to regular alterations, most recently in 2019 (with further amendments related to Covid in 2020). Of particular note for this policy were the changes made in 2019, which included removing the restrictions on pooling more than five planning obligations towards a single piece of infrastructure, and meant that authorities were able to use both CIL and Section 106 for the same item. This means that there is scope for a rethink of how infrastructure is funded in Reading.
- 3.84 Another change introduced in 2019 is that, under Regulation 121A of the CIL Regulations 2010 (as amended), an authority that receives contributions must now publish an Infrastructure Funding Statement by 31st December each year. The matters which must be included are set out in Schedule 2 of the Regulations and relate primarily to receipt and expenditure of CIL and Section 106 contributions, but Regulation 121A also states that this must include *“a statement of the infrastructure projects or types of infrastructure which the charging authority intends will be, or may be, wholly or partly funded by CIL”*.
- 3.85 However, according to Planning Practice Guidance, the IFS should also set out *“future spending priorities on infrastructure and affordable housing in line with up-to-date or emerging plan policies”*. This should include the infrastructure projects or types that are expected to be delivered through developer contributions. As such, there is some crossover with policy CC9 (albeit that the policy takes precedence) and there is a case to review the policy to make clear the relationship with the IFS.
- 3.86 The Levelling-Up and Regeneration Bill, currently in the House of Lords, is expected to be enacted in 2023. This provides for the introduction of an Infrastructure Levy, which charging authorities (which would include the Council) would be required to charge in their areas. CIL would be withdrawn in most areas, including Reading. The Infrastructure Levy is also expected to replace Section 106 agreements. Enaction of the Levy, together with details of how it would work, would be provided through regulations. Whilst it is not therefore clear how this would impact on policy CC9, it is very likely that more detail will emerge through the process of updating policies, and would almost certainly result in a need for an update.

National policy changes

- 3.87 The presumption in favour of sustainable development, as set out in the latest version of the NPPF, specifically includes reference to aligning growth with

infrastructure, which was not present at the time that the Local Plan was examined.

- 3.88 Another matter of importance is that, in the sections on plan-making, there is now specific reference to provision of digital infrastructure and green infrastructure. Whilst the latter is referred to in policy CC9, the former is not and this should be considered in any update.

Other policy changes

- 3.89 The Thames Valley Berkshire Recovery and Renewal Plan, published in 2020, emphasises the importance of skills in the economic recovery and future growth, as one of the three main themes, including the development of skills infrastructure projects. This fits well with the approach of CC9.

Monitoring data

- 3.90 Monitoring of infrastructure contributions takes place through the annual Infrastructure Funding Statement, published in December each year, the first version of which covered 2019-20.
- 3.91 In terms of CIL, between 2019 and 2022 the Council has collected £20.46m in CIL receipts. Spending over the same period has totalled £10.09m. Of that spending, £6.30m (62%) has been on highways and £2.07m (21%) has been on open space and leisure.
- 3.92 In terms of Section 106, between 2019 and 2022 the Council collected £9.11m in financial contributions. Spending in that period has totalled £12.69m. The most significant type of Section 106 spend was £5.91m (47%) on transport and travel, followed by £2.91m (23%) on affordable housing and £1.65m (13%) on open space and leisure.
- 3.93 In terms of overall spend of all types of developer contributions, the following are the most significant types of spend:
1. Highways - £6.51m
 2. Transport and travel - £5.97m
 3. Open space and leisure - £3.72m
 4. Affordable housing - £2.91m
 5. Education - £1.09m
 6. Community facilities - £0.85m
 7. Economic development - £0.49m
 8. Green infrastructure - £0.06m
- 3.94 Whilst the most significant types of spend is not an exact match for the priority infrastructure types highlighted in CC9, there are no significant issues arising from this data that suggests a need to update the policy.

Appeals

- 3.95 This policy has cited in four appeal decisions since the plan was adopted and, where relevant, has been supported. However, in two of these cases it was referenced to support the need for affordable housing, where it is not relevant. This is a matter to resolve internally and does not require any policy update.

Other changes in circumstances

- 3.96 In terms of 2021 Census results, although the total number of people with no qualifications has increased from 21,834 to 22,361, this has decreased as a proportion of the overall population, from 17.4% to 15.8%. Although this is moving in the right direction, this continues to represent a substantial portion of the population meaning that the issue should continue to be given prominence in the policy.

Conclusion

- 3.97 Policy CC9 should be subject to update due to:
- Changes to pooling restrictions for spend of Section 106 agreements;
 - The new role of Infrastructure Funding Statements in setting spend priorities;
 - The forthcoming Infrastructure Levy, details of which may emerge during the update process; and
 - The lack of reference to digital infrastructure.

EN1: Protection and Enhancement of the Historic Environment

- 3.98 This policy is a general policy to ensure that historic features, areas of historic importance and other elements of the historic environment, including their settings are protected and where possible enhanced.

Legislative changes

- 3.99 There have been no legislative changes that affect this policy.

National policy changes

- 3.100 There have been no national policy changes that result in the need to update this policy.

Other policy changes

- 3.101 There have been no other policy changes that affect this policy.

Monitoring data

- 3.102 Since the Local Plan was adopted in 2019, there have been no losses of listed buildings, conservation areas, buildings of townscape merit within conservation areas, scheduled ancient monuments or registered parks and gardens. There has been one permission granted that would result in the loss of a locally-listed building at 55 Vastern Road (see policy EN4). Monitoring data does not therefore indicate a need to update the policy.

Appeals

- 3.103 This policy was relevant to eleven appeal decisions since the plan was adopted and none of these decisions have indicated any need to amend or update the policy.

Other changes in circumstances

- 3.104 There have been no other changes in circumstances that affect this policy

Conclusion

- 3.105 No changes have been identified that result in the need to update policy EN1.

EN2: Areas of Archaeological Significance

- 3.106 This policy sets out the approach to follow to where development may potentially have an impact on sites of archaeological importance. It particularly sets out the approach to development that would impact on scheduled monuments.

Legislative changes

- 3.107 There have been no legislative changes that affect this policy.

National policy changes

- 3.108 There has been only one change relating to this topic within the NPPF, which is that a clause stating that “*Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets*” has been deleted. This does not affect the policy, as it is not known that there are any such assets in the Borough.

Other policy changes

- 3.109 There have been no other policy changes that affect this policy.

Monitoring data

- 3.110 There is no monitoring data associated with this policy.

Appeals

- 3.111 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.112 There have been no other changes in circumstances that affect this policy

Conclusion

- 3.113 No changes have been identified that result in the need to update policy EN2.

EN3: Enhancement of Conservation Areas

- 3.114 This policy aims to ensure that the special character of conservation areas are conserved and enhanced, and it highlights the opportunities for enhancement within relevant conservation area appraisals.

Legislative changes

- 3.115 There have been no legislative changes that affect this policy.

National policy changes

- 3.116 There have been no national policy changes that result in the need to update this policy.

Other policy changes

- 3.117 The Council's new Corporate Plan 2022-25 highlights the High Street Heritage Action Zone programme, covering parts of conservation areas within the town centre and due to complete in 2024, in promoting the culture and heritage of Reading. This programme has been conceived within the existing policy context, and does not therefore require any policy update.

Monitoring data

- 3.118 There is no monitoring data associated with this policy.

Appeals

- 3.119 This policy was relevant to seven appeal decisions since the plan was adopted and none of these decisions have indicated any need to amend or update the policy.

Other changes in circumstances

- 3.120 Two new conservation area appraisals have been adopted since the Local Plan was submitted and/or adopted. The St Peters conservation area appraisal was finalised in November 2018 and the Castle Hill/Russell Street/Oxford Road appraisal was finalised in 2020. Both appraisals led to extensions in the extent of the respective conservation areas, and both identified a number of priorities for enhancement, and both contained action plans for improvement of the area. Many of the priorities identified in policy EN3 are reflected in the appraisal, and the list in EN3 is in any case not intended to be exhaustive. The publication of the appraisals is not therefore considered to represent a reason to update the policy.

Conclusion

- 3.121 No changes have been identified that result in the need to update policy EN3.

EN4: Locally Important Heritage Assets

- 3.122 This policy aims to set out the approach where a building is considered to be locally important but is not significant enough to benefit from statutory protection. The Council maintains a list of locally-important buildings and structures.

Legislative changes

- 3.123 There have been no legislative changes that affect this policy.

National policy changes

- 3.124 There have been no national policy changes that result in the need to update this policy.

Other policy changes

- 3.125 There have been no other policy changes that affect this policy.

Monitoring data

- 3.126 There have been 11 buildings added to the local list since the Local Plan was adopted.
- 3.127 There have been no demolitions of locally listed buildings since the Local Plan was adopted.

Appeals

- 3.128 This policy was relevant to two appeal decisions since the plan was adopted. There were two issues that arose that are worthy of mention.
- 3.129 Firstly, one appeal decision applied this policy to a building of townscape merit in a conservation area. However, this was not a locally-listed building and the policy supporting text could clarify to make clear the instances in which this policy applies.
- 3.130 Another issue raised in an appeal is that the policy requires the significance of the building in the event of its loss or harm to be significantly outweighed by the benefits. The appeal considered the degree to which this is in conformity with the approach of the NPPF, and any update to the policy should consider this matter further.
- 3.131 Although it has not arisen in appeals, it is also worth noting that there is wording in the policy specifically relating to decisions by the Local Planning Authority, which is generally not how policies should be worded because it potentially precludes that part of the policy from being used by another decision maker, for instance a planning inspector.

Other changes in circumstances

- 3.132 A new process for considering whether a building or structure should be added to the local list was introduced in May 2021. Under this new process, nominations should be considered by Planning Applications Committee. This has led to something of an acceleration of additions to the local list, with an additional 10 locally-listed buildings since the new process was introduced. The total number of buildings on the local list is 24 (although 2 have been demolished). This new process fits well with the existing policy, and there is not considered to be any particular need to change the policy as a result.

Conclusion

3.133 Policy EN4 should be subject to update due to:

- The need to address issues raised in appeal decisions; and
- The need to tighten up the wording so that the whole policy is relevant to all decision makers.

EN5: Protection of Significant Views with Heritage Interest

3.134 This policy aims to ensure that new development does not harm and where possible makes a positive contribution to views of acknowledged historical significance. Nine views are identified in the policy.

Legislative changes

3.135 There have been no legislative changes that affect this policy.

National policy changes

3.136 There have been no national policy changes that result in the need to update this policy.

Other policy changes

3.137 There have been no other policy changes that affect this policy.

Monitoring data

3.138 There is no monitoring data associated with this policy.

Appeals

3.139 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

3.140 There have been no other changes in circumstances that affect this policy.

Conclusion

3.141 No changes have been identified that result in the need to update policy EN5.

EN6: New Development in a Historic Context

3.142 This policy aims to ensure that new development in an area characterised by heritage assets is informed and shaped by the historic environment.

Legislative changes

3.143 There have been no legislative changes that affect this policy.

National policy changes

3.144 There have been no national policy changes that result in the need to update this policy.

Other policy changes

- 3.145 There have been no other policy changes that affect this policy.

Monitoring data

- 3.146 There is no monitoring data associated with this policy.

Appeals

- 3.147 This policy was relevant to four appeal decisions since the plan was adopted and none of these decisions have indicated any need to amend or update the policy.

Other changes in circumstances

- 3.148 There have been no other changes in circumstances which affect this policy.

Conclusion

- 3.149 No changes have been identified that result in the need to update policy EN6.

EN7: Local Green Space and Public Open Space

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

Legislative changes

- 3.151 There have been no legislative changes that affect this policy.

National policy changes

- 3.152 There have been no national policy changes that result in the need to update this policy.

Other policy changes

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

- Ibis Club;
- Madejski Stadium;
- John Madejski Academy;
- University of Reading Sports Park;
- Caversham Park;
- Prospect School;
- Reading School;
- Reading Girls School;
- Leighton Park School;

- Ranikhet Primary School;
- The Abbey School
- Scours Lane;
- Downing Road Playing Fields; and
- The Wren School

3.154 These sites are still covered by EN8, which presumes against the loss of undesigned open space, other than Downing Road which is subject to the development allocation WR2. However, the policy may need to be updated to ensure that some of these sites benefit from more specific protection.

3.155 In terms of specific built facilities on designated sites, the Strategy highlights only the development of a family hub at Prospect Park, which has now been delivered.

Monitoring data

3.156 In the time since the beginning of the plan period (2013-2022), there has been a net increase of 2.875 hectares of public open space, although since the Local Plan was submitted in 2018 there has actually been a small net loss of 0.43 ha. However, this is all public open space, not just those areas specifically identified in policy EN7.

3.157 In terms of the specific areas identified in EN7, there have been four instances where development has led to the loss of any of the identified areas as follows:

- EN7Wi: Kensington Park - loss of 0.03 ha as a result of proposal for relocation of a scout hut;
- EN7Ww: Riverside and Thameside Promenade - loss of 0.04 ha as a result of a proposal for new leisure facilities (overall open space due to increase);
- EN7Nn: Mapledurham Playing Fields - loss of 0.51 ha as a result of development of a new primary school;
- EN7Ed: Palmer Park - loss of 0.11 ha as a result of a proposal for new leisure facilities.

3.158 In total, the loss of open space within areas identified in EN7 since the plan was submitted totals 0.69 ha. This is relatively small in the context of the 359 ha total that is identified as Local Green Space or Public Open Space, and each proposal has been considered appropriate based on the material considerations at the time. However, there will be a need to update the boundaries of the spaces to account for these changes.

Appeals

3.159 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

3.160 There have been no other changes in circumstances other than those identified under 'Monitoring data' above.

Conclusion

3.161 Policy EN7 should be subject to update due to:

- The need to consider additions to take account of the Playing Pitches Strategy; and
- Changes to boundaries of existing spaces due to development.

EN8: Undesignated Open Space

3.162 This policy addresses open space that is not covered by the designations in policy EN7, and contains a presumption that such open space should be retained, other than where replacement open space, of a similar standard and function, can be provided at an accessible location close by, or where improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space.

Legislative changes

3.163 There have been no legislative changes that affect this policy.

National policy changes

3.164 There has been a very slight change to the wording in the NPPF relating to the loss of sports and recreational buildings and land, including playing fields, which is that the new version states that one of the criteria to allow for loss is that the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use, whereas the previous version referred to 'needs' as opposed to 'benefits'. However, as the policy always followed the spirit of this provision rather than repeating the exact wording, this is not considered to require an update.

Other policy changes

3.165 There have been no other policy changes that affect this policy.

Monitoring data

3.166 As set out in relation to EN7, in the time since the beginning of the plan period (2013-2022), there has been a net increase of 2.875 hectares of public open space, although since the Local Plan was submitted in 2018 there has actually been a small net loss of 0.43 ha.

Appeals

3.167 This policy was relevant to two appeal decisions since the plan was adopted. One of these decisions is of concern because the decision considered the loss of undesignated open space was acceptable because it was not particularly typical and had no obvious function. The policy does not include these considerations on whether the open space could be lost, and a policy update may be necessary to make this clear.

Other changes in circumstances

- 3.168 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.169 No changes have been identified that result in the need to update policy EN8.

EN9: Provision of Open Space

- 3.170 This policy aims to set expectations for the amount, type and quality of new open space to be provided as part of a development.

Legislative changes

- 3.171 There have been no legislative changes that affect this policy.

National policy changes

- 3.172 There have been no national policy changes that result in the need to update this policy.

Other policy changes

- 3.173 There have been no other policy changes that affect this policy.

Monitoring data

- 3.174 As set out in relation to EN7, in the time since the beginning of the plan period (2013-2022), there has been a net increase of 2.875 hectares of public open space, although since the Local Plan was submitted in 2018 there has actually been a small net loss of 0.43 ha.
- 3.175 Since the Local Plan was submitted, there has been 1.41 ha of new public open space delivered on development sites. The sites were as follows:
- Coley Avenue - 0.11 ha
 - Elvian School, Bath Road - 0.17 ha
 - Worton Grange, Imperial Way - 0.3 ha
 - Green Park Village - 0.83 ha
- 3.176 Since the Local Plan was submitted, there has been 2.74 ha of new public open space permitted on development sites. The sites were as follows:
- Kenavon Drive - 0.13 ha
 - Former Cox & Wyman, Cardiff Road - 0.05 ha
 - Former Battle Hospital, Portman Road - 0.11 ha
 - Royal Elm Park, Shooters Way - 1.6 ha
 - Station Hill - 0.35 ha
 - 55 Vastern Road - 0.06 ha

- Wensley Road - 0.44 ha²

Appeals

- 3.177 This policy was relevant to one appeal decision since the plan was adopted and this did not indicate any need to amend or update the policy.

Other changes in circumstances

- 3.178 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.179 No changes have been identified that result in the need to update policy EN9.

EN10: Access to Open Space

- 3.180 This policy aims to ensure that access to existing open space is improved in areas with relatively poor existing access to such space.

Legislative changes

- 3.181 There have been no legislative changes that affect this policy.

National policy changes

- 3.182 There have been no national policy changes that result in the need to update this policy.

Other policy changes

- 3.183 The Rights of Way Improvement Plan (ROWIP) was published for consultation in November 2022. This seeks to secure better connection of the rights of way network generally. Action 4.3 seeks to create paths as part of new development, and part of this is to identify useful paths for access to countryside or shortcuts. EN10 will help to achieve this.

Monitoring data

- 3.184 There is no monitoring data associated with this policy.

Appeals

- 3.185 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.186 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.187 No changes have been identified that result in the need to update policy EN10.

² There is a net loss of public open space on this site. In overall terms therefore, the gain of public open space on the listed sites is 1.61 ha.

EN11: Waterspaces

- 3.188 This policy aims to protect and enhance the town's waterspaces, and sets out policy for development in the vicinity of watercourses, relating to design, landscape and biodiversity.

Legislative changes

- 3.189 There have been no legislative changes that affect this policy.

National policy changes

- 3.190 There have been no national policy changes that result in the need to update this policy.

Other policy changes

- 3.191 There have been no other policy changes that affect this policy.

Monitoring data

- 3.192 There is no monitoring data associated with this policy.

Appeals

- 3.193 This policy was relevant to one appeal decision since the plan was adopted, but this involved exploring some elements of the policy in depth. Of particular relevance is that the proposal, on the banks of the Thames, was considered to not be in accordance with the largely natural character of the Thames overall, but the decision gave weight to the urban character in this particular location. Whilst the policy could be strengthened in response, it should be recognised that this site presented a fairly unique set of circumstances that are unlikely to be replicated in future proposals. The development also breached the 10 metre buffer, but the wording of the policy does state that this should be achieved 'wherever practicable'. Appeal decisions are not therefore considered to require an update to this policy.

Other changes in circumstances

- 3.194 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.195 No changes have been identified that result in the need to update policy EN11.

EN12: Biodiversity and the Green Network

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

Legislative changes

- 3.197 The Environment Act 2021 introduces significant new provisions which affect the relationship between biodiversity and development.
- 3.198 The existing duty on public authorities to conserve biodiversity is amended by the Act to a duty to conserve and enhance biodiversity, an important change in emphasis.
- 3.199 Of particular significance to the operation of policy EN12 is the introduction of mandatory 10% biodiversity net gain (BNG) on development sites, which will come into force in November 2023. The current policy includes an expectation that there will be no net loss of biodiversity on site and that there will be a net gain wherever possible, which is a distinct approach, and there is a need for the policy to be updated to take account of and incorporate mandatory biodiversity net gain.
- 3.200 Further regulations are expected on Biodiversity Net Gain to set out the detail of how it will operate in practice, but these have not been published yet. These are expected to be produced whilst the policy is in the process of being updated.
- 3.201 The Environment Act also introduces Local Nature Recovery Strategies, which are to include a statement of biodiversity priorities for the strategy area and also a local habitat map for the area. These are to be prepared for defined areas, and in the case of Reading this would cover the six Berkshire unitary authorities. Such a strategy, once prepared, will clearly be of importance in any update to Local Plan policies, but it is not clear at this stage whether the Berkshire LNRS will be available during the process of reviewing the Local Plan. If it is, this would significantly inform any update.

National policy changes

- 3.202 There are few significant changes to the overall approach to biodiversity within the NPPF, although this could continue to change over the period of updating the Local Plan as the contents of the Environment Act come into force. One important addition, however, is that the latest version of the NPPF states that planning policies should “*pursue opportunities for securing measurable net gains for biodiversity*”. This should be considered when undertaking an update.

Other policy changes

- 3.203 The Reading Climate Emergency Strategy, published in 2020, identifies a number of actions across a number of partners to address the climate emergency. This includes several actions within the ‘Nature’ theme that are of relevance to this policy.
- 3.204 There is an action (N10) to review the likely requirements for compensatory habitat provision to allow for the introduction of BNG. This review is being undertaken as part of a forthcoming Biodiversity and Natural Environment SPD, and there are likely to be matters arising that will mean a need to update policy EN12.
- 3.205 Action N11 involves identifying wildlife corridors based on those in the Local Plan, and in particular identifying primary and secondary routes, whilst action N12

involves assessing the quality of these corridors. Action N13 relates to managing the impact of development on wildlife corridors, including ensuring that design and planting contributes to these corridors and ensuring connectivity. More detailed work on Green Links is being undertaken as part of the SPD, and this may also lead to further updates to this policy.

- 3.206 In 2021, as part of the response to the climate emergency, the Council published a new Biodiversity Action Plan. This aims to ensure that by 2030 Reading will be richer in wildlife, be better connected to the wider landscape and that biodiversity loss will have been reversed. It sets a framework and lists actions for achieving this. It is not a formal planning policy document, but it sets a number of actions that need to be achieved through operation of planning, and it therefore significantly informs planning decisions and influences the content of this SPD.
- 3.207 The following actions listed in the BAP are of particular relevance to the policy:

Table 3.1: Actions relevant to policy EN12 from the Biodiversity Action Plan

Objective	Action	Timeframe
A1 The Council will ensure that its policies and plans are up to date with wildlife and biodiversity legislation.	Review and update policy as new legislation comes into force.	Ongoing
A1 The Council will ensure that its policies and plans are up to date with wildlife and biodiversity legislation.	Uphold existing environmental protections	Ongoing
C1 To continue to assess all planning applications for their ecological impacts	To assess planning applications for their impact on protected, priority and notable species, and priority habitats, ancient woodland and protected sites	Ongoing
C1 To continue to assess all planning applications for their ecological impacts	To require developers to provide on-site ecological enhancements	Ongoing
C2 To ensure that new development results in measurable net gain in biodiversity units	To produce a supplementary planning document, possibly in conjunction with neighbouring authorities, that sets out the Council's approach to Biodiversity Net Gain.	2021
C4 To protect Reading's soils	Assess planning applications in terms of their impact on soils	Ongoing
F8 To ensure that new development maximises the opportunities to conserve and enhance the biodiversity of rivers	Ensure that, as a minimum, new development does not increase light spillage over rivers	Ongoing
F8 To ensure that new development maximises the opportunities to conserve and enhance the biodiversity of rivers	To seek opportunities to de-culvert watercourses	Ongoing

F8 To ensure that new development maximises the opportunities to conserve and enhance the biodiversity of rivers	To ensure that any new landscaping adjacent to watercourses is predominantly native and wildlife friendly	Ongoing
F8 To ensure that new development maximises the opportunities to conserve and enhance the biodiversity of rivers	To require the re-naturalisation of the river bank when new development is adjacent to it	Ongoing

- 3.208 Given the wide-ranging nature of the BAP, it is considered that its publication also results in a need to update the policy.

Monitoring data

- 3.209 The number of Local Wildlife Sites under positive conservation management is monitored by Thames Valley Environmental Records Centre. In 2018-19, 16 of the 19 LWSs (84%) were in positive conservation management, compared to 15 of the 19 (79%) in 2020-21, the last year for which we have up to date data. Although this represents a reduction, it is worth noting that this remains the highest percentage of the Berkshire authorities.
- 3.210 Monitoring data also includes the area of Reading that is classed as a priority habitat. In the most recent survey in 2020, this was 360.2 ha. The overall amount of priority habitat is lower than the previous survey in 2018 (383.7 ha). Whilst there have been some on the ground changes, the bulk of this difference is simply down to differences in mapping and measuring from aerial photos rather than loss of habitats on the ground.
- 3.211 The monitoring data therefore indicates that further action is required for biodiversity in Reading, which is why the Biodiversity Action Plan was prepared, which in turn leads to a need to update the policy.

Appeals

- 3.212 This policy was relevant to eight appeal decisions since the plan was adopted. In general, the policy approach was supported, with some matters of detail subject to discussion that do not affect the need to update the policy. However, one decision came to the conclusion that a grass verge does not contribute to the green network despite being part of a Green Link shown on the proposals map. This is a misunderstanding of the purpose of the network that an update to the policy should be able to resolve.

Other changes in circumstances

- 3.213 There have been no other changes in circumstances that affect the policy.

Conclusion

- 3.214 Policy EN12 should be subject to update due to:
- The introduction of mandatory Biodiversity Net Gain and other aspects of the Environment Act;

- The need to incorporate actions from the Climate Emergency Strategy and Biodiversity Action Plan; and
- The rectify a misunderstanding that has arisen in an appeal decision.

EN13: Major Landscape Features and Areas of Outstanding Natural Beauty

- 3.215 This policy identifies five major landscape features, the character of which should be maintained, and also outlines the approach to the edge of the areas of outstanding natural beauty in adjacent authorities.

Legislative changes

- 3.216 There have been no legislative changes that affect this policy.

National policy changes

- 3.217 There has been a slight change in national policy in that the NPPF, when stating that policies should protect and enhance valued landscapes, now includes the clause that this should be in a manner commensurate with their statutory status or identified quality in the development plan. EN13 is already in line with this principle.
- 3.218 Work is underway on a potential extension to the Chilterns AONB. This follows the publication of the government commission Landscapes Review, in September 2019 (the ‘Glover Review’), which recommended an extension. A Written Ministerial Statement by the Secretary of State for Environment, Food and Rural Affairs, George Eustice, committed in a Written Ministerial Statement on 24th June 2021 to designate additional protected landscapes including an extension to the Chilterns AONB. This work is now underway, and it is currently expected that an Order to amend the boundary will be made by October 2024. At this stage, it is not known whether any land within Reading or on the boundary would be affected, and this will not become clear for some time. Changes on the boundary would be unlikely to require a policy update, albeit that it would need to be reflected on the Proposals Map, but should land within Reading be designated, either EN13 would need to be updated or a new policy would be required.

Other policy changes

- 3.219 There have been no other policy changes that affect this policy.

Monitoring data

- 3.220 Over the Local Plan period so far, only two dwellings and less than 1,000 sq m of non-residential floorspace have been completed within a designated major landscape feature, with none of this having taken place since adoption of the Local Plan in 2019. Policy EN13 is not a total block on development within the identified major landscape features, rather ensures that it does not detrimentally impact their character. Therefore, this low level of development is not considered to indicate a need to review the policy.

Appeals

- 3.221 This policy was relevant to three appeal decisions since the plan was adopted. In one case, the approach of the policy was generally upheld. In another case, the decision considered that a proposal did not conflict with the policy because there were no outward views from the site to the landscape feature, but did not deal with the degree to which vegetation on site contributed to the feature when viewed from outside the site. There is an opportunity to update the policy to address this issue. In another case, the decision considered that there was already an urban character which meant no policy conflict, which is another matter that can be considered in an update.

Other changes in circumstances

- 3.222 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.223 Policy EN13 should be subject to update due to:
- Proposals to extent the Chilterns Area of Outstanding Natural Beauty; and
 - The need to amend the policy to rectify a misunderstanding arising from an appeal decision about how the policy is to be applied.

EN14: Trees, Hedges and Woodland

- 3.224 This policy aims to protect existing trees, hedges and woodlands where they are of importance and ensure that new tree planting takes place within development sites.

Legislative changes

- 3.225 The Environment Act 2021 includes new wide-ranging powers and measures to improve the natural environment. Of particular importance are the requirements for 10% Biodiversity Net Gain on development sites and the introduction of Local Nature Recovery Strategies, which are dealt with in relation to policy EN12, but will also likely have impacts in terms of trees, hedges and woodlands which form a key element of habitats in Reading. The implications of these changes would need to be considered as part of any update of the policy.
- 3.226 Section 115 of the Act introduces a ‘Duty to Consult’ which will give the public the opportunity to understand why a street tree is being felled and express any concerns regarding this. This is unlikely to particularly affect the need to update the policy.

National policy changes

- 3.227 The most recent version of the NPPF includes a paragraph on the importance of trees and their multiple benefits that was not present in the 2012 version. It states that planning policies should ensure that new streets are tree-lined and that trees are incorporated elsewhere in the development, and that there should be long-term maintenance measures for newly-planted trees. It also talks about the

importance of the right trees in the right place. Policy EN14 is already generally in conformity with this approach, but if it is to be updated in any case consideration should be given to how this additional national policy weight can be complemented.

Other policy changes

- 3.228 The Council published a new Tree Strategy in March 2021. This dealt with all aspects of trees in Reading, including tree planting and protection on development sites, but also management of the Council's own tree stock. This replaced the previous 2010 Tree Strategy, and was part of implementing the Climate Emergency Strategy, prepared in response to the Council's declaration of a Climate Emergency in February 2019.
- 3.229 This strategy includes ambitious proposals for new tree planting in Reading up to 2030. In particular, the headline aims are to ensure that at least 3,000 'standard' trees are planted on Council land over that period, and that overall canopy cover is increased from 18% to 25%. No ward should have a canopy cover of less than 12% by 2030. A number of treed corridors, including the main roads, railways, rivers and Green Links are identified as a focus for tree planting.
- 3.230 The Strategy also aims to address climate adaptation by increasing the diversity of the tree stock to provide resistance to climate impacts, provide large canopy species for shading (including shading along riverbanks to help keep rivers cool), and maintain the health of trees. For the purposes of improving biodiversity, native trees or trees with wildlife value should be selected, planting should not adversely affect other habitats, natural regeneration should be used where practicable, and ancient woodlands and ancient or veteran trees should be protected. There is also a focus on biosecurity.
- 3.231 The approach and measures in the Tree Strategy are broadly in line with policy EN14, and are being implemented through a Biodiversity and Natural Environment SPD to supplement EN14. However, there are elements that could benefit from being incorporated into the policy and which would therefore require an update.
- 3.232 The Climate Emergency Strategy includes some relevant actions, in particular to increase tree cover across the town (N1) and to increase hedgerows (N8). These are considered to be broadly in line with the approach of EN14, and is mainly being dealt with through the Biodiversity and Natural Environment SPD.

Monitoring data

- 3.233 The Tree Strategy contains proposals for enhanced monitoring of tree planting including on development sites, but this has not yet resulted in any data that can be used.
- 3.234 A Reading's Tree Canopy Cover Assessment was produced in October 2022 which assessed the proportion of Reading that is covered by tree canopy. This found that 17.7% of Reading Borough is covered by tree canopy (higher than the average for England of 16.5%), with the coverage for individual wards varying between 5.5% (Abbey) and 26.8% (Caversham Heights). The assessment also looked at the

benefits of trees in Reading in terms of carbon storage and sequestration, avoided run-off and pollution removal, and estimated the equivalent financial value per year as being £4.34 million. Trees in Reading are estimated to sequester 2,190 tonnes of carbon per year, remove 15.5 tonnes of pollution per year and avoid 177,000 cubic metres of run-off per year.

- 3.235 Whilst all of the above emphasises the critical value of trees in the Borough, none of it results in a particular need to update the policy.

Appeals

- 3.236 This policy was relevant to eleven appeal decisions since the plan was adopted. In most of those cases, the decision was in line with the way that the policy was intended to be applied. One decision of significance involved an Inspector attaching more limited weight to the importance of large canopy trees because they were only mentioned in the supporting text as opposed to the policy text itself. This is a matter that could require a policy update.

Other changes in circumstances

- 3.237 There have been no other changes in circumstances that affect this policy

Conclusion

- 3.238 Policy EN14 should be subject to update due to:
- The need to incorporate some of the provisions of the Tree Strategy into the policy; and
 - The need to address the issue of large canopy trees that has arisen in an appeal decision.

EN15: Air Quality

- 3.239 This policy aims to ensure that development has regard to the need to improve air quality and reduce the effects of poor air quality. Development should not detrimentally affect air quality and should avoid placing sensitive uses within areas of poor air quality, unless those effects can be mitigated.

Legislative changes

- 3.240 Reading Borough Council was highlighted by DEFRA as one of a number of Local Authorities where the UK's national air quality assessment has identified road links that are currently exceeding the annual mean NO₂ limit value, with exceedances predicted to continue in 2019 and in some cases beyond.
- 3.241 The Council, along with 32 other Local Authorities, received a Ministerial Direction on the 23rd March 2018 to undertake a feasibility study into NO₂ compliance. This was the 'third wave' of Local Authorities charged with undertaking such a study. Previously 5 Local Authorities (the so called 'first wave') were directed to undertake a feasibility study, these were followed by a second wave of 23 Local Authorities directed to undertake a local study in 2017. Reading was therefore at

the time considered to be among the 60 authorities most affected by levels of NO₂, but not within the 28 of greatest concern.

- 3.242 The continuation of a strong policy to ensure that air quality is a key consideration in decision making is therefore required. This is already provided by the policy and it is not therefore considered that an update is necessary.

National policy changes

- 3.243 The references to air quality in the NPPF have been updated to include a clause that *“Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement”*. It is stated that this should be considered at plan-making stage insofar as is possible. However, this is more of a strategic approach than is appropriate for consideration in a development management policy such as this, and is already inherent in the overall strategy, and does not therefore require an update to the policy.

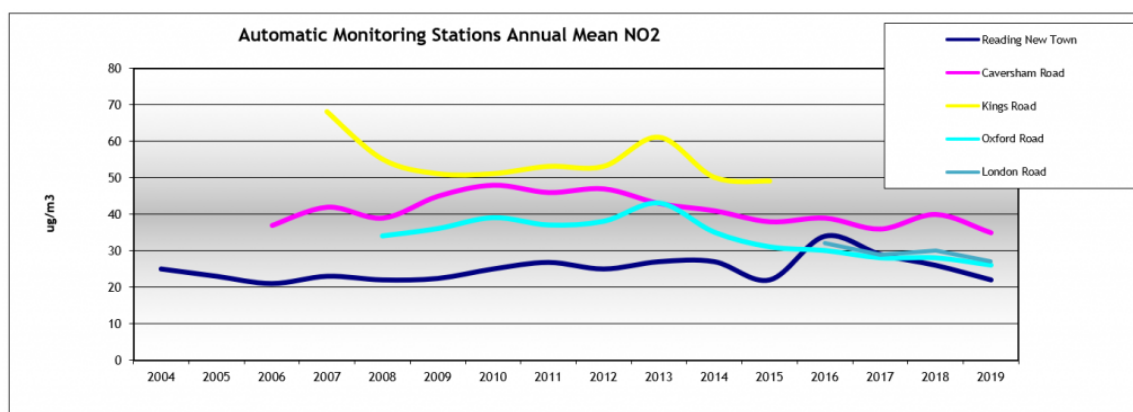
Other policy changes

- 3.244 There have been no other policy changes that affect this policy.

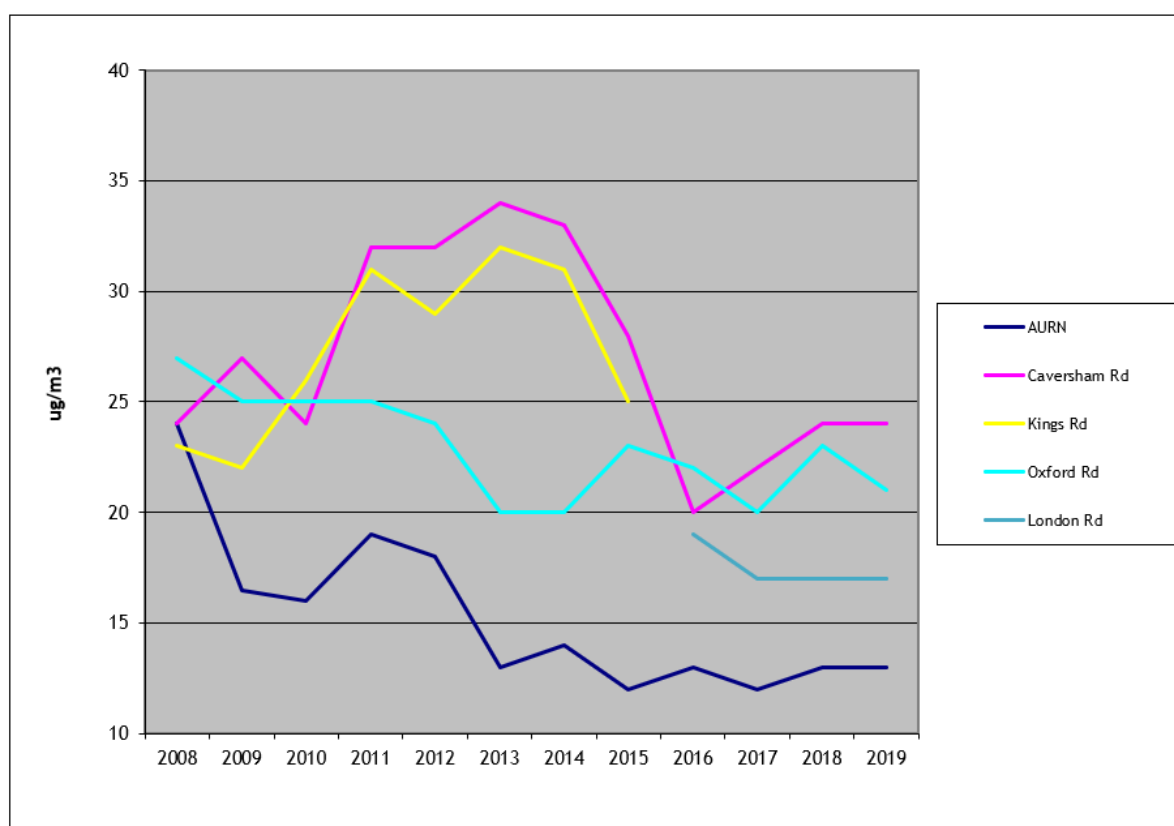
Monitoring data

- 3.245 Air quality monitoring data is reported on the Council’s website³. This contains a great deal of detail on air quality at specific locations across the Borough. The latest information reported is for 2019. As air quality is usually highly linked to congestion in Reading, data for subsequent years due to changes in travel patterns associated with Covid which may not persist in the long-term. Therefore, there is not a significant time series of data since the Local Plan was produced that would likely highlight the need for any changes.
- 3.246 In terms of nitrogen dioxide (NO₂), the trend at the automatic monitoring stations is shown in Figure 3.1 below. This shows an improvement in air quality between 2018 and 2019 for those locations where data exists. There were 5 monitoring locations within the Borough where an annual mean NO₂ level that exceeds the national objective level of 40µg/m³ was recorded in 2019. This compares to 13 such locations in 2018.

³ [2020 Air Quality Annual Status Report \(ASR\) - Reading Borough Council](#)

Figure 3.1: Annual mean NO₂ levels in automatic monitoring stations in Reading

- 3.247 The data therefore appears to show an improvement in NO₂ levels between 2018 and 2019. However, there remain a number of locations where NO₂ remains a significant concern, including locations where the national objective levels are exceeded, meaning the need to retain a strong policy to deal with this issue.
- 3.248 In terms of particulate matter, the data also records levels of PM₁₀s in several locations, and this trend is shown in Figure 3.2 below. The data does not show a clear trend between 2018 and 2019. As it is NO₂ which is the main concern across Reading, there is less widespread recording of PM₁₀ data, and no recorded exceedences of national objective levels. However, as set out in the supporting text to the policy, there is no ‘safe’ level of PM₁₀, meaning that a policy to ensure air quality is taken into account in development management decisions is still required.

Figure 3.2: Trends in annual mean PM₁₀ concentrations

Appeals

- 3.249 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.250 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.251 No changes have been identified that result in the need to update policy EN15.

EN16: Pollution and Water Resources

- 3.252 This policy aims to deal with contamination, noise, light and water pollution. It prevents developments that would be damaging to the environment and sensitive receptors and ensures that developments that are sensitive to pollution do not take place where they would be affected by such pollution. It requires consideration of whether there is adequate water, sewerage and wastewater resources to support development. It further requires management and remediation of contamination where necessary.

Legislative changes

- 3.253 There have been no legislative changes that lead to a need to update the policy.

National policy changes

- 3.254 Although there has been some restructuring of the relevant sections of the NPPF on pollution and ground conditions, the overall approach remains in place and there are therefore no national policy changes that result in a need to update the policy.

Other policy changes

- 3.255 There have been no other policy changes that affect this policy.

Monitoring data

- 3.256 There is no monitoring data associated with this policy.

Appeals

- 3.257 This policy was relevant to two appeal decisions since the plan was adopted. In these cases, the decision was in line with the way that the policy was intended to be applied.

Other changes in circumstances

- 3.258 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.259 No changes have been identified that result in the need to update policy EN16.

EN17: Noise Generating Equipment

- 3.260 This policy sets out expectations for the noise level of new noise-generating equipment.

Legislative changes

- 3.261 There have been no legislative changes that affect this policy.

National policy changes

- 3.262 There have been no national policy changes that result in the need to update this policy.

Other policy changes

- 3.263 There have been no other policy changes that affect this policy.

Monitoring data

- 3.264 There is no monitoring data associated with this policy.

Appeals

- 3.265 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.266 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.267 No changes have been identified that result in the need to update policy EN17.

EN18: Flooding and Sustainable Drainage Systems

- 3.268 This policy aims to set expectations in terms of flood risk, by following the relevant national policy tests and ensuring that the capacity of the flood plain to store floodwater is not reduced, the flow of floodwater is not impeded and the risks to life and property are not increased. It also sets out expectations for Sustainable Drainage Systems (SuDS).

Legislative changes

- 3.269 There have been no legislative changes that affect this policy.

National policy changes

- 3.270 There are several changes to national policy on flood risk. Firstly, the flood risk vulnerability classifications, essential for applying the exception test, are now within the NPPF itself rather than Planning Practice Guidance. This ensures that they are considered as part of policy, but this does not result in a need to update the policy.
- 3.271 The NPPF also now refers to the potential importance of natural flood management techniques. This is covered to a degree by the part of EN18 that relates to SuDS, and there is no lack of conformity that requires a policy update.
- 3.272 Finally, there are now specific criteria within the NPPF on SuDS, in that they should take account of advice from the lead local flood authority, have appropriate minimum operational standards, have maintenance arrangements in place for the lifetime of the development and will provide multifunctional benefits. The SuDS policy is in accordance with these general principles.

Other policy changes

- 3.273 The Reading Climate Emergency Strategy, published in 2020, identifies a number of actions across a number of partners to address the climate emergency. This includes an action (W12) to implement SuDS, including explaining their importance and practical application and improve post-scheme monitoring. The policy is already broadly in line with this, but there may be a need for further detail within a SPD, which is intended to be included within the Biodiversity and Natural Environment SPD.

Monitoring data

- 3.274 Since the start of the plan period in 2013, there have been 1,920 dwellings and 34,652 sq m of non-residential floorspace completed on sites wholly or partly in Flood Zones 2 and 3. Since 2019, when the plan was adopted, the respective figures are 1,434 dwellings and 2,161 sq m of non-residential floorspace. It was known from the outset that meeting development needs would require land within Flood Zone 2 and, in some cases, Flood Zone 3, given that so much of the town

centre includes land at risk of flooding. This is why the Local Plan included monitoring targets of a maximum 4,000 dwellings and 250,000 sq m of non-residential floorspace. These targets have not been breached, and this is not therefore considered to be a reason to update the policy.

Appeals

- 3.275 This policy was relevant to one appeal decision since the plan was adopted and this did not indicate any need to amend or update the policy.

Other changes in circumstances

- 3.276 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.277 No changes have been identified that result in the need to update policy EN18.

EM1: Provision of Employment Development

- 3.278 This policy aims to identify the level of employment development required and deal with the impacts that a higher level of employment than planned for could have on the demand for housing.

Legislative changes

- 3.279 There have been no legislative changes that affect this policy.

National policy changes

- 3.280 There are two principal changes within national policy that are of potential relevance to this policy.
- 3.281 Firstly, the NPPF states that Local Industrial Strategies should be considered when setting out an economic vision and strategy. The Berkshire Local Industrial Strategy had already been published in draft form when the Local Plan was adopted, and has not so far been finalised, so there are no particular updates to the policy that are required at this point.
- 3.282 Secondly, alongside the importance of knowledge-driven clusters, the NPPF now mentions the need for storage and distribution operations at a variety of scales and in suitably accessible locations. The needs assessment that underpinned policy EM1 identified a significant need for additional industrial and warehouse floorspace, in part due to the strength of need for storage and distribution, and this is therefore already reflected in EM1, but this needs assessment will require a refresh as it is now more than five years old, and this can therefore meet the requirements of the NPPF.

Other policy changes

- 3.283 The Wokingham Local Plan Update went through consultation on a full draft between February and April 2020. Policy ER1 of the draft plan relates to provision for employment needs, and identifies only a small requirement for additional

floorspace for employment. This need is expected to be met within Wokingham and does not result in any unmet need to be accommodated within Reading.

- 3.284 The Bracknell Forest Local Plan was submitted in December 2021. Bracknell Forest sits within the same identified Functional Economic Market Area as Reading, and the examination hearings took place during 2022. The plan identifies needs for office and industrial and warehouse space. It plans to meet the office need in full, but there is 33,875 sq m of unmet need for industrial and warehouse space. There is no expectation in the plan that this be delivered in neighbouring authorities.
- 3.285 The Proposed Submission West Berkshire Local Plan was published for consultation in January 2023. This identifies needs for both office and industrial/warehouse space but is not able to meet those needs in full, despite call for sites exercises and duty to co-operate requests. The identified office need is 50,816 sq m to 2039, whilst the identified industrial and warehouse need is 91,109 sq m or 23 ha to 2039. Of the latter, around 69,000 sq m is provided for through allocations in the plan. According to the evidence to support the Local Plan, West Berkshire forms a distinct Functional Economic Market Area from Reading (which is grouped with Wokingham, Bracknell Forest and Windsor and Maidenhead), but there is nevertheless scope for any further employment evidence to consider whether these unmet needs will have an impact on how Reading should plan for employment.
- 3.286 The South Oxfordshire Local Plan 2011-2034 was adopted in December 2020. It identified a need for an additional 39.1 ha of employment land up to 2035 and plans to meet this in full within the area. There is therefore no unmet need that impacts on the Reading Local Plan.

Monitoring data

- 3.287 In terms of office floorspace, there has been a net loss of 74,203 sq m over the whole plan period so far from 2013 to 2022. This compares to the identified need referenced in EM1 of between 53,000 and 112,000 sq m of office floorspace. Clearly, the delivery of the identified office need is significantly off track, not helped by a steady stream of conversion of office floorspace to residential through permitted development rights. However, there are outstanding permissions that would deliver much of the identified need, even taking account of the losses so far, totalling 155,343 sq m at 31st March 2022.
- 3.288 In terms of industrial and warehouse floorspace, there has been a net gain of 19,834 sq m over the plan period so far from 2013 to 2022, compared to the identified need in EM1 of 148,000 sq m. This is some way behind the rate of development to meet the needs in full over the plan period, although it is at least a positive gain. In any case, meeting industrial and warehouse needs is particularly dependent on the delivery of one large Local Plan site which has not yet come forward. There were outstanding permissions for industrial and warehouse space totalling 32,297 sq m at 31st March 2022.

Appeals

- 3.289 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.290 Results of the 2021 Census have some potentially important implications for how employment need is calculated. As set out in the section of this report on the overall strategy, the 2021 results appear to point to decreasing economic activity rates, with the economically active population increasing by 4% since 2011 compared to an overall population increase of 12%. Also of significance is the explosion in the percentage of people who work from home, from 8.8% of the working age population in 2011 to 39.3% in 2021. Clearly the timing of the census means that this is primarily Covid-related, but the effects of Covid will almost certainly have a permanent legacy that needs to be factored into an assessment of employment needs.

Conclusion

- 3.291 Policy EM1 should be subject to update due to:
- The need to reassess needs for employment development that are now more than five years old, including understanding the impacts of Covid;
 - The needs to consider unmet needs from neighbouring authorities.

EM2: Location of New Employment Development

- 3.292 This policy aims to identify the main locations for major office and industrial or warehouse development. In doing so, it identifies a number of Core Employment Areas.

Legislative changes

- 3.293 There have been no legislative changes that affect this policy.

National policy changes

- 3.294 There have been no national policy changes that affect the need to update this policy.

Other policy changes

- 3.295 The Central and Eastern Berkshire Joint Minerals and Waste Plan (CEBJMWP) was adopted in January 2023, and sets out policy for considering minerals and waste development proposals. Policy W4 identifies a number of Preferred Waste Areas, which are the locations where waste management capacity should be delivered in the first instance (alongside specifically allocated sites). These Preferred Waste Areas include nine of the identified Core Employment Areas, as follows:
- South of Basingstoke Road
 - Bennet Road
 - North of Basingstoke Road

- Elgar Road
- Portman Road
- Richfield Avenue
- Paddock Road
- Wigmore Lane
- Bridgewater Close

3.296 These areas are all identified as being potentially suitable for Category 3 activities (activities requiring enclosed industrial premises (small scale)), whilst Portman Road, Richfield Avenue, South of Basingstoke Road and Wigmore Lane are also identified as potentially suitable for Category 2 activities (activities requiring a mix of enclosed buildings / plant and open ancillary open (possibly involving biological treatment)). However, these activities are typically industrial uses of a type for which the Local Plan already considers the Core Employment Areas suitable, and provision of these activities is likely to count towards meeting employment needs in any case. For this reason, there is no need to update the policy to account for the CEBJMWP.

Monitoring data

- 3.297 For office completions in the period 2018 to 2022, 98% of floorspace completed for office development were in the preferred locations in policy EM1, i.e. central Reading and the A33 corridor. For new office permissions over the same period, the equivalent figure is 100%.
- 3.298 For industrial and warehouse completions during 2018 to 2022, 99% of floorspace completed was in the A33 corridor or core employment areas, which are the areas to which policy EM1 directs such development. For new industrial and warehouse permissions, the relevant figure is also 99%.
- 3.299 Therefore, the vast majority of employment completions and permissions have been located in accordance with policy EM1.

Appeals

- 3.300 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.301 The impacts of updating policies EM1 and H1 will influence locational strategies for employment development, including whether or not there is a need for further releases of areas currently protected as Core Employment Areas for other uses such as residential.

Conclusion

- 3.302 Policy EM2 should be subject to update due to:
- The implications of revised assessments of need for both employment and housing uses.

EM3: Loss of Employment Land

- 3.303 This policy aims to maintain employment land within the defined Core Employment Areas and sets out a criteria-based approach to proposals for loss of employment land in other locations.

Legislative changes

- 3.304 On 1st September 2020, changes to the Use Classes Order came into force with implications for employment land. In particular, a number of formerly separate use classes were combined within a new use class E (Commercial, Business and Service). This includes shops (formerly A1)⁴, financial and professional services (A2), restaurants and cafes (formerly A3), offices, light industrial and research and development (formerly B1) as well as a number of community and leisure uses formerly within the D1 and D2 use classes. Changes of use within a single use class are not classed as development, and do not therefore require planning permission.
- 3.305 These changes may affect policy EM3 in that office or light industrial premises could be used for other uses within this use class, such as retail and leisure, without any need for planning permission, unless there are restrictions on the planning permission. However, it is not considered that these changes are as likely to have significant effects on the operation of the policy as for other uses, due mainly to the relatively low demand for other uses within this category in an employment location.
- 3.306 Changes to the General Permitted Development Order (GPDO) have also been made since adoption of the plan, to extend permitted development rights. A new permitted development right to convert class E uses to residential came into force on 1st August 2021 and replaced existing permitted development rights for conversion of offices to flats. The new right carries additional restrictions and therefore means that the policy is more likely to be able to control uses in the way envisaged.
- 3.307 However, a new permitted development right to demolish offices and light industrial premises and redevelop for residential (Part 20, class ZA) has been introduced, which potentially carries significant implications for employment land where, in many cases, loss to residential would not be capable of control.
- 3.308 The Council made an Article 4 direction which came into force on 15th November 2022 which removes the permitted development rights that would result in the loss of commercial or associated sui generis uses for residential use and the redevelop of business premises for residential across all of the Core Employment Areas and a number of other commercial areas. The Secretary of State retains powers to modify or cancel the direction, but at the time of writing this had not occurred, which means that in the context of the changes to residential outlined above there is not a need to update the policy.

⁴ Unless the shop sells essential goods, is less than 280 sq m and there is no other such facility within a 1,000 m radius.

National policy changes

- 3.309 There have been no national policy changes that affect the need to update this policy.

Other policy changes

- 3.310 There have been no other policy changes that affect this policy.

Monitoring data

- 3.311 General figures for net change in employment floorspace are set out in relation to policy EM1, and show an overall loss of office floorspace and a gain of industrial and warehouse space.
- 3.312 With more specific reference to the identified Core Employment Areas, in terms of completed floorspace, there has been an overall net gain of employment floorspace within those areas of 29,319 sq m between 2018 and 2022. In terms of new permissions over the same period, there would be a net gain of 1,776 sq m of employment floorspace within Core Employment Areas.
- 3.313 Therefore, in overall terms, there would be no net loss of employment floorspace within the identified areas. There have been individual permissions which would lead to some loss of employment floorspace, but this is often for a related use which requires an employment area location, or often retains an employment use on part of a site. As such the monitoring data does not highlight a need to revise the policy.

Appeals

- 3.314 This policy was relevant to one appeal decision since the plan was adopted and this did not indicate any need to amend or update the policy.

Other changes in circumstances

- 3.315 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.316 No changes have been identified that result in the need to update policy EM3.

EM4: Maintaining a Variety of Premises

- 3.317 This policy aims to ensure that the variety of employment premises within Reading is not reduced, with a particular focus on maintaining levels of start-up and grow-on space across Reading, and storage and distribution space in the South of Basingstoke Road Core Employment Area.

Legislative changes

- 3.318 The changes to use classes and introduction of new permitted development rights outlined in relation to policy EM3 could also have implications for EM4 as it may make it more difficult to retain certain types of premises, in particular small business units that fall within the E class category. However, the Article 4

direction outlined in the discussion on policy EM3 prioritises the protection of the main small business locations, and this therefore ensures that the Council retains as much control as possible, meaning no particular need to update the policy.

National policy changes

- 3.319 The recognition of the importance of storage and distribution to the wider economy in the latest version of the NPPF underlines the importance of the protection that policy EM4 provides to those premises in the most accessible locations to the strategic road network.

Other policy changes

- 3.320 There have been no other policy changes that affect this policy.

Monitoring data

- 3.321 Over the plan period up to 31st March 2022 there had been a net loss of two small units (up to 150 sq m). These losses are very minor, and in any case occurred in 2017-18, before the Local Plan was submitted and adopted.
- 3.322 There had also been a net loss of 7,153 sq m of storage and distribution space in the South of Basingstoke Road, in two separate developments, changes of use to a builders merchants and a general industrial facility (albeit with continued flexibility for B8 use). These were considered appropriate given that the sites were vacant and the proposed uses were similar to, and included flexibility for, B8 use.
- 3.323 The monitoring data does not therefore indicate a particular need to revise the policy.

Appeals

- 3.324 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.325 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.326 No changes have been identified that result in the need to update policy EM4.

H1: Housing Provision

- 3.327 This policy aims to set out the amount of housing that would be provided in Reading over the plan period, and identify the scale of the shortfall and how it is to be addressed.

Legislative changes

- 3.328 There have been no legislative changes that affect this policy.

National policy changes

- 3.329 The Local Plan was based on the 2012 NPPF and associated Planning Practice Guidance, under which local authorities were required to objectively assess their housing need. This was fulfilled by the Berkshire (including South Bucks) Strategic Housing Market Assessment, which, following the PPG approach at the time, identified an objectively assessed housing need for Reading of 699 homes per annum.
- 3.330 However, paragraph 61 of the NPPF now states that:
- “To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”*
- 3.331 Whilst a standard methodology for assessing housing need was in place at the time the Local Plan was submitted (29th March 2018), the transitional arrangements meant that Local Plans submitted before 31st March 2018 did not need to apply the standard methodology.
- 3.332 The standard methodology has been amended since it was initially introduced, and the most recent change in December 2020 is particularly significant for Reading. This applies a 35% uplift to the urban local authorities in the top 20 cities and urban centres list, which includes Reading.
- 3.333 Application of the standard methodology set out in PPG based on the most recent available information would be as follows.
- **Step 1 - Setting the baseline**
 Reading’s household projections using the 2014-based projections are:
 - 68,971 households in 2022
 - 73,990 households in 2032

This is a total of 5,019 new households over the 10 year period, equivalent to an average household growth of 502 per year.
 - **Step 2 - An adjustment to take account of affordability**
 Reading’s median workplace-based affordability ratio, as published in April 2021, is 8.85. As this is above 4, the affordability adjustment should be made.
 Using the formula specified in the PPG, this results in an affordability adjustment factor of 1.303125, as set out below:

$$((8.85 - 4)/4) \times 0.25 + 1$$

$$= (4.85/4) \times 0.25 + 1$$

$$= 1.2125 \times 0.25 + 1$$

$$= 1.303125$$

Applying this adjustment to the household growth from step 1 gives a figure of 654 per year.

- **Step 3 - Capping the level of any increase**

As the existing Local Plan policy was adopted within the last five years, the cap is set at 40% above the annual average housing requirement in the adopted Local Plan. The annual housing requirement in policy H1 is 689. The cap is therefore 965 homes per year. The figure generated by steps 1 and 2 is within this capped level.

- **Step 4 - Cities and urban centres uplift**

A 35% uplift is applied to those cities and urban centres within the top 20 cities and urban centres list. This includes Reading. A 35% increase over the figure of 654 generated by steps 1 and 2 is 883.

- 3.334 The standard methodology based on most recent information would therefore result in a need of 883 homes per year. This is significantly higher than the need of 699 homes per year set out in the Local Plan. The PPG makes clear that this circumstance represents a significant change:

“Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or has been subject to a cap where the plan has been adopted using the standard method.”⁵

- 3.335 Please note that work to support any policy amendments will need to revisit this calculation, and that it may change during the process of amending the policies. The above calculation is undertaken purely to identify whether an update to the policy should be progressed. In addition, the NPPF allows for consideration of an alternative approach in exceptional circumstances. The Council is undertaking further work on these matters.
- 3.336 A consultation on national policy changes was launched in December 2022 and closed early in March 2023. This consulted on a number of matters relevant to policy H1, including that authorities with an up to date Local Plan would not need to demonstrate a five year supply, and that local authorities can undertake alternative calculations of need if this can be justified. Of particular relevance to Reading is a re-statement of commitment to the 35% urban uplift, and also an expectation that this should be delivered in the core authority other than by voluntary agreement with neighbours. These approaches are not yet in place, and transitional arrangements may affect the degree to which they are required to be taken into account in the update, but they are nevertheless important to consider.

⁵ Paragraph: 062 Reference ID: 61-062-20190315

Other policy changes

- 3.337 A new Housing Strategy for Reading 2020-2025 has been produced. This includes two priorities that relate to the supply of housing, which in general fit in with the overall aims of policy H1:
- Priority 1: Deliver high quality and sustainable homes and neighbourhoods; and
 - Priority 2: Facilitate a supply of housing that will meet the identified needs of all residents.
- 3.338 The Wokingham Local Plan Update went through consultation on a full draft between February and April 2020, and there was a subsequent consultation on a Revised Growth Strategy which related primarily to the overall spatial strategy between November 2021 and January 2022. The Local Plan Update identifies that the standard methodology at the time results in a need for Wokingham of 769 dwellings, and the draft Local Plan planned for 772 homes per year as a minimum, albeit that the actual delivery shown in the plan was expected to be 933 homes per year. Based on the latest situation therefore, Wokingham was planning to deliver more housing than its identified needs, and therefore no unmet need is expected to arise.
- 3.339 The Proposed Submission West Berkshire Local Plan was published in January 2023. It identifies a housing requirement of 513 to 538 homes per annum up to 2039. The 513 figure represents local housing need as generated by the standard methodology, meaning that this represents a minimum. The supporting text recognises the unmet need in the existing Reading Borough Local Plan but does not explicitly make provision to meet it.
- 3.340 The Bracknell Forest Local Plan was submitted in December 2021. Identified housing need in Bracknell Forest of 614 homes per annum. The Local Plan plans to meet this need as well as an additional allowance of 10% to incorporate flexibility. There is no unmet need arising from Bracknell Forest. A proposed main modification to the plan recognises the unmet need from Reading and notes that the 10% allowance incorporates sufficient flexibility to meet some of this need if it cannot be met closer to Reading.
- 3.341 The South Oxfordshire Local Plan 2011-2034 was adopted in December 2020. This identifies a requirement of 900 homes per year between 2011 and 2026, 1,120 between 2026 and 2032 and 1,100 between 2032 and 2035. This met South Oxfordshire's needs in full as well as an allowance for meeting a portion of Oxford's unmet needs. The likely direction of travel was known whilst the Reading Borough Local Plan was in preparation as a result of duty to co-operate discussions, and RBC made clear there was no expectation for South Oxfordshire to deliver any of Reading's unmet needs.
- 3.342 An Oxfordshire Growth Plan which was to look at growth including housing across Oxfordshire to 2050 is now no longer being progressed.

Monitoring data

- 3.343 Over the Local Plan period so far, between 2013 and 2022, there have been 5,853 new homes completed. This is slightly behind the housing requirement for the period of 6,201 homes (689 x 9), but not significantly so, particularly in view of the very significant levels of housing under construction (2,519 at 31st March 2022), which would indicate expected good levels of supply over the next few years.
- 3.344 The Council's most recent housing trajectory is published within the 2021-22 Annual Monitoring Report. This takes account of anticipated supply across the whole plan period based on updated site information. The trajectory currently anticipates not only that the H1 provision will be met in full, but that the higher objectively assessed need figure of 699 homes per year will also be met, and indeed that the total housing provision over the plan period will exceed the H1 targets by more than 2,000. The average annual provision if the expected supply comes forward on the sites that are already known would be in the region of 790-800 homes per year. Whilst the precise figures would need reassessment as part of the update process, it is clear that there is capacity to increase the housing provision figures even without considering new allocations.
- 3.345 One specific element of supply worth considering further is small site windfall supply. The Housing Trajectory in the Local Plan (and the versions published since) assume that delivery on windfall sites of less than 10 dwellings will be 127 per year, based on past average supply. Over the Local Plan period so far (2013 to 2022), the actual delivery has averaged 118 per year. Whilst this is not significantly below expectations, it would nevertheless be necessary to use this updated information to assess the degree to which housing provision can account for these small site windfalls.

Appeals

- 3.346 This policy has been a factor in only one appeal since the Local Plan was adopted, but the decision of that appeal is potentially significant. It determined that the standard methodology for calculating housing need was not of direct relevance to development management within the context of the current policy, but that the provision of homes as part of housing supply at this stage would nonetheless be of significant benefit. However, given the conclusions elsewhere that the policy requires update as a result of matters including the standard methodology, this is of limited relevance.

Other changes in circumstances

- 3.347 Duty to co-operate work across the Western Berkshire Housing Market Area has continued with relation to housing needs. A Statement of Common Ground covering the West of Berkshire area (West Berkshire, Reading, Wokingham and Bracknell Forest) was signed in August 2021 to form the basis for plan making. This identifies housing need and supply as a strategic matter on which co-operation is required. It summarises the position at the time in terms of housing need, noting that the only unmet need arising in the area is from Reading's Local Plan. It also agrees that the starting point for plan making in each authority is to seek to meet

its own needs in the first instance, but that there is scope for major development locations to be established that help to meet cross-boundary needs, which would require further joint working.

- 3.348 A new Memorandum of Understanding (MoU) was signed in August 2021 which replaced the previous MoU on Reading's unmet needs that supported the Local Plan. This version continued the understanding regarding the unmet needs identified in the Reading Borough Local Plan, but made clear that this understanding related only to the calculation of need identified in that document, not to any subsequent figure, in particular that arising from the standard methodology. It agreed that the standard methodology does not form an agreed basis for calculating Reading's housing need before the five year review period expires, that local plans in preparation in the area should take account only of unmet need as set out in the Reading Borough Local Plan, that joint working will continue to respond to changes and to lobby government to change their approach, and that supporting infrastructure is required. It is therefore clear that any new housing need figures will require fresh discussions under the duty to co-operate regarding how it is to be accommodated and cannot rely on existing arrangements.
- 3.349 There have also been results published from the 2021 Census that would be of relevance to any fresh assessment of housing need, particularly because it could be considered to represent market signals that would need to be taken into account. There has been a clear shift away from owner-occupation, with a decrease from 54.8% of households in 2011 to 50.4% in 2021, whilst the proportion of private renting households increased from 26.1% to 31.9%, which is likely to be linked to affordability. In addition, the average household size has increased from 2.48 to 2.57 which may at least partly be related to suppression of household formation due to the difficulty of finding a home. Market signals would need to be factored into any alternative approach to calculating need should this be pursued.

Conclusion

- 3.350 Policy H1 should be subject to update due to:
- Changes in national policy, in particular the standard methodology for housing need;
 - Changes in housing delivery that would allow for an increased policy provision over the plan period;
 - Latest market signals and demographic evidence; and
 - The need for further co-operation with neighbouring authorities to reflect the latest position in terms of housing need.

H2: Density and Mix

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

Legislative changes

- 3.352 There have been no legislative changes that affect this policy.

National policy changes

- 3.353 The most up-to-date version of the NPPF includes significant additional provisions about density. Whereas in the 2012 version against which the Local Plan was examined it was simply stated that local authorities should “*set out their own approach to housing density to reflect local circumstances*” there is now a much greater focus on achieving efficient use of land. The most up-to-date NPPF states that minimum density standards should be set for city and town centres and other locations that are well-served by public transport, and that these should seek a significant uplift in the average density of residential development. This will apply to significant areas of Reading, and, since policy H2 is not currently expressed in terms of minimum density, this will require an update to the policy.

Other policy changes

- 3.354 Reading’s new Corporate Plan 2022-25 includes targets for provision of family housing of three bedrooms or more of 117 in 2022-23, 124 in 2023-24 and 137 in 2024-25. Although these targets represent a minority of overall provision, they will nevertheless be extremely challenging within the context of Reading.

Monitoring data

- 3.355 In terms of developments completed in the period between submission of the plan in March 2018 and 31st March 2022, the size of dwellings delivered has been as follows:
- Studio/1-bed homes: net gain of 1,185 (44% of total)
 - 2-bed homes: net gain of 1,045 (39% of total)
 - 3-bed homes: net gain of 354 (13% of total)
 - 4-bed homes: net gain of 126 (5% of total)
 - 5+ bed homes: net loss of 21 (N/A)
- 3.356 Therefore, in overall terms, family dwellings of 3 bedrooms or more represent only 18% of supply over that period, whereas the identified need in the SHMA 2016 was for over 50% of homes to be of this size.
- 3.357 In terms of new permissions, a similar pattern can be seen. The number of homes of each size newly permitted between 1st April 2018 and 31st March 2022 is as follows:
- Studio/1-bed homes: net gain of 2,383 (45% of total)
 - 2-bed homes: net gain of 2,362 (44% of total)
 - 3-bed homes: net gain of 486 (9% of total)
 - 4-bed homes: net gain of 126 (2% of total)
 - 5+ bed homes: net loss of 6 (N/A)

- 3.358 For new permissions, the proportion of new dwellings that are family dwellings of 3 bedrooms or more is even smaller, at 11%.
- 3.359 Even if the analysis is narrowly focused on the circumstances in which policy H2 seeks family dwellings, i.e. new build housing with 10 homes or more outside designated centres, delivery is still falling short of the policy requirement of 50%. For completions between 2018 and 2022, 36% were for homes of 3 bedrooms or more, whilst for new permissions over the same period, 25% were for family homes of this size.
- 3.360 The number of people on Part 1 of the Self-Build Register at the end of the seventh base period (30th October 2022) was 45. Part 1 relates to those that have passed the local connection test, and this is the figure that is used for the purposes of calculating compliance with the statutory duty to grant sufficient permissions. The number of permissions for self-build homes granted since the local connection test was introduced (1st April 2019) up to the end of the seventh base period (30th October 2022) was 22. Sufficient permissions are not being granted in Reading to meet needs identified on the Register, and the Council is not currently meeting its statutory duty in this regard. Delivery of self-build homes in Reading remains extremely difficult due to the urban characteristics of the Borough, but the monitoring nevertheless indicates that this part of the policy should potentially be subject to update.

Appeals

- 3.361 This policy was relevant to two appeal decisions since the plan was adopted. In one case the decision was in line with the way that the policy was intended to be applied. In the other case there was some confusion about whether the policy was applicable to proposals for student accommodation, and an update to the policy should clarify its applicability to other forms of accommodation.

Other changes in circumstances

- 3.362 An analysis has been carried out of what has been achieved in practice in a planning permission approved since the Local Plan was submitted on those sites allocated for residential development and how this compares to the dwelling range set out in the policy, for the purposes of understanding whether the Local Plan overestimates or underestimates capacity. There are 18 sites where a residential permission was granted after the policy range was set. This analysis found the following:
- For 17 of the 18 sites, the number of dwellings permitted exceeded the mid-point of the dwelling range expressed.
 - On average, the dwelling total permitted exceeded the mid-point of the allocation by 67.5%.
 - For 12 of the 18 sites, the number of dwellings permitted exceeded the upper end of the dwelling range expressed.
 - On average, the dwelling total permitted exceeded the upper end of the allocation by 36.3%.

- 3.363 Therefore, recent permissions have consistently been granted for a greater number of dwellings than anticipated at allocation stage. This indicates that there is likely to be a case for density to be re-examined, for both allocated sites and all sites across the board.

Conclusion

- 3.364 Policy H2 should be subject to update due to:
- National policy that requires authorities to consider minimum density standards in town centres and other accessible areas;
 - Monitoring information that shows very low levels of delivery of homes of three bedrooms or more compared to needs;
 - Monitoring information that shows low levels of delivery of self-build housing;
 - Need for clarification that the policy does not apply to non-C3 forms of accommodation.

H3: Affordable Housing

- 3.365 This policy aims to ensure that housing development makes an appropriate contribution to the delivery of affordable housing, either through delivery on site for larger developments, or through a financial contribution for smaller developments.

Legislative changes

- 3.366 There are no significant legislative changes that result in a need to update the policy.

National policy changes

- 3.367 The most up-to-date version of the NPPF states that at least 10% of dwellings as part of major housing developments should be for affordable home ownership products, which was not present in the 2012 version against which the Local Plan was examined. Policy H3 does not currently specify tenure in any case, but an update is likely to do so, taking into account work on the Affordable Housing SPD (see below), and this provision will therefore need to be taken into account in any update.
- 3.368 On 24th May 2021, the Minister of State for Building Safety and Communities made a Written Ministerial Statement (WMS) regarding the introduction of a new affordable housing product, First Homes. First Homes are homes for first time buyers with a minimum discount of 30%. The WMS stated that a minimum of 25% of on-site affordable units secured by Section 106 should be for First Homes. It also stated that a minimum of 25% of off-site financial contributions secured should be used for the provision of First Homes. The remainder should be provided in accordance with policy requirements, prioritising the securing of social rent. This policy approach needed to be taken into account in development plans from June 2021. If a Local Plan can justify it, there is potential to specify greater levels of discount of 40% or 50%. Whilst tenures are not currently specified in H3, there is potential

to do so to reflect the more recent Affordable Housing SPD, and the introduction of First Homes may have implications for the overall picture in terms of viability.

Other policy changes

- 3.369 An Affordable Housing SPD was adopted in March 2021 to supplement policy H3. Whilst the document in general provides more detailed guidance to supplement the policy that does not necessarily need to be reflected in a policy update, there are two areas in particular where an update to the policy is expected to be required to reflect the approach and give it greater policy weight.
- 3.370 First, the Local Plan policy delegates the specific tenures sought to the SPD, and the SPD then specifies that 62% of affordable housing provision should be for Reading Affordable Rent, and 38% for affordable home ownership products including shared ownership. Since the policy specifies that an ‘appropriate tenure mix’ will be sought, there is clearly scope to refer to the tenure mix within the policy itself.
- 3.371 Secondly, the SPD refers to the need to seek a deferred contribution towards affordable housing in cases where a viability case has been made for a reduced contribution, and that this should be incorporated within the Section 106 agreement. Inclusion of this element within the policy would ensure that this requirement is as clear as possible from the outset.
- 3.372 The Council’s Housing Strategy 2020-2025 identifies the importance of securing affordable housing. One of its key outcomes is the continued provision of 30% of homes on sites of 10 dwellings or more as affordable homes. It also identifies that there should be 200 new rented Council properties by 2025, which are to be provided through the Local Authority New Build programme.

Monitoring data

- 3.373 In terms of overall affordable housing delivery, there have been 904 affordable homes delivered over the plan period so far between 2013 and 2022, an average of 100 per year. This represents 15% of all homes delivered over that period. In addition, at 31st March 2022, there was outstanding planning permission for 1,071 additional affordable homes. However, the level of identified need of 406 per year is very significantly beyond this level of provision.
- 3.374 Monitoring has also covered whether policy targets for different sizes of development have been achieved. For sites of 10 or more dwellings, over the plan period so far (2013-2022), 1,225 affordable dwellings have been secured in signed Section 106 agreements, as well as £2.02 million in off-site financial contributions. Based on assumptions used in the AMR as well as supporting evidence to the Local Plan examination⁶, the total contribution on sites of this size where policy would

⁶ To calculate an equivalent proportion, the total units secured through a S106 is added to the financial contribution converted to units on the basis that delivering an affordable unit is estimated to cost £100,000 as calculated in evidence for the Local Plan examination. This is compared to the total number of units granted within developments that in policy terms should generate an affordable housing requirement.

expect an affordable housing contribution represents 20.2% of the total dwellings compared to the policy target of 30%.

- 3.375 For sites of 5-9 dwellings, between 2013 and 2022, 24 affordable dwellings were secured by Section 106 as well as £2.51 million in off-site financial contributions. This equates to an overall contribution of 11.8% in comparison to a policy target of a financial equivalent of 20%.
- 3.376 For sites of 1-4 dwellings, between 2013 and 2022, 19 affordable dwellings were secured by Section 106 in addition to £4.49 million in off-site financial contributions. This equates to an overall contribution of 12.1% in comparison to a policy target of a financial equivalent of 10%, and this is the only size of site for which the policy target has so far been exceeded.
- 3.377 For sites of 5-9 and for 10 or more dwellings, permissions over the plan period so far have therefore fallen short of the policy requirement. Whilst the policy as well as the SPD allow for viability negotiations, there is potentially a need to review the policy approach, particularly given that there do not appear to be the same issues for sites of 1-4 dwellings.

Appeals

- 3.378 This policy was relevant to 28 appeal decisions since the plan was adopted. The vast majority of these were in line with the intentions of the policy, including regularly applying the requirement for an affordable housing contribution from small sites.
- 3.379 However, there have been two appeals that have come to differing conclusions on whether In one appeal, an Inspector did not uphold the Council's request for a deferred contribution towards affordable housing in the event that viability of the development were to improve, which was part of the (at the time) emerging Affordable Housing SPD. This SPD is now adopted and provides a policy basis for seeking a deferred contribution, but it would give greater weight if it were included in an updated policy.

Other changes in circumstances

- 3.380 There are increasing difficulties in delivering on-site affordable housing in some developments as many Registered Providers are reluctant to take flats in the town centre. In general, a Section 106 agreement would include a cascade mechanism, whereby, if an RP prepared to take on the units cannot be found, they should then be offered to the Council, and finally an off-site financial contribution would be required. An update of policy H3 should consider how this matter can be addressed.

Conclusion

- 3.381 Policy H3 should be subject to update due to:
- Changes in national policy and legislation to reflect the inclusion of First Homes as an affordable housing product;
 - More specific approaches to affordable housing tenure;

- Monitoring information that shows that the levels of affordable housing needed are not being delivered;
- Potential changes in viability for different sizes of development; and
- Consideration of inclusion of the need to seek a deferred contribution where the affordable housing contribution has been reduced as a result of viability;

H4: Build to Rent Schemes

- 3.383 This policy aims to set out criteria for consideration of proposals for build to rent housing, which are purpose-built private rented developments held in a single ownership.

Legislative changes

- 3.384 There have been no legislative changes that affect this policy.

National policy changes

- 3.385 There have been no national policy changes that affect this policy.

Other policy changes

- 3.386 The Council's Housing Strategy 2020-2025 refers to build to rent provision, and one of its identified outcomes is that *"large-scale Build to Rent proposals in the town to have a positive impact on the local area and to be accessible for local people"*. The policy as it stands is broadly in line with this outcome.

Monitoring data

- 3.387 So far in the Local Plan period up to 31st March 2022, 315 build-to-rent dwellings have been delivered in a single development. A further 599 build-to-rent dwellings are under construction within a further development, with an additional 422 build-to-rent dwellings having planning permission. These are the first build to rent developments to be delivered in Reading, and a number of other major town centre schemes are expected to take this form. As the experience of build-to-rent in Reading is very new, there are likely to be lessons from these developments that could potentially form an update to the policy, and this policy should therefore be included within the update.

Appeals

- 3.388 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.389 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.390 Policy H4 should be subject to update due to:
- The need to take account of emerging lessons from the development of the first build-to-rent schemes in Reading.

H5: Standards for New Housing

- 3.391 This policy aims to set out a variety of standards for new housing development around energy and emissions performance, water consumption, internal space and accessibility and adaptability.

Legislative changes

- 3.392 From 15th June 2022, new building regulations are in effect that have improved the performance of new homes. Improvements to Part L of the Building Regulations result in a 31% improvement in carbon emissions compared to previous standards. This is below the minimum 35% improvement specified in policy H5.
- 3.393 The changes to Part L represent a step on the way towards the Future Homes Standard, which is expected to be introduced in 2025, and is to see 75-80% reductions in carbon emissions. A technical consultation on the Future Homes Standard is due to take place during 2023.
- 3.394 The June 2022 changes are likely to have a considerable overlap with the local requirements for carbon emissions within H5, but there may be some issues in terms of comparability, including the base level over which improvements are to be made and the version of the Standard Assessment Procedure (SAP) that is used to measure them. However, clearly there is now a need to consider how the existing and proposed Building Regulations amendments influence changes to this part of policy H5, particularly as more information becomes available on the Future Homes Standard.

National policy changes

- 3.395 The sections of national policy on climate change have evolved over time, but potentially of greatest significance is that the clause in the 2012 NPPF that *“when setting any local requirement for a building’s sustainability, do so in a way consistent with the Government’s zero carbon buildings policy and adopt nationally described standards”* is no longer in national policy. National policy has therefore opened up more to the possibility of local authorities setting their own sustainability standards, which is something that should be considered within an update to the policy.

Other policy changes

- 3.396 The Reading Climate Emergency Strategy, published in 2020, identifies a number of actions across a number of partners to address the climate emergency. This includes an action (E2) to introduce high standards of energy efficiency for new development, including larger housing developments to be built to zero carbon standards. This is already addressed through policy H5.
- 3.397 A Sustainable Design and Construction SPD was adopted in December 2019. However, the contents of the SPD follow on from the policy approach in H5 (and other policies) and this does not lead to a need to update the policy.
- 3.398 The Council’s Housing Strategy 2020-2025 identifies the importance of improving the sustainability of Reading’s housing stock. It notes that, using funds raised

through the zero carbon approach in policy H5, it will be used to support retrofit of carbon reduction measures to existing housing in the borough. Continuation of this policy approach is therefore important to continue to achieve this element of the Housing Strategy.

Monitoring data

- 3.399 For permissions granted for major new-build residential developments since the Local Plan was adopted in November 2019, 1,899 of the 3,504 homes permitted (54%) were permitted at zero carbon homes standard. The majority of those that were not permitted to these standards were as part of applications where there had been a resolution to grant prior to adoption of the plan, but the permission had been issued after adoption with signature of the Section 106 agreement. As such it is not considered that this represents a reason to update the plan.
- 3.400 Data is not collected on the application of the conditions required by other parts of the policy, but there have been no issues arising in implementing this policy that indicate that it should be updated.

Appeals

- 3.401 This policy was relevant to ten appeal decisions since the plan was adopted. The vast majority of these were in line with the intentions of the policy. The national space standards have been referred to in two appeals involving conversions, where they do not apply, but the policy is already very clear on this point and it does not require an update.

Other changes in circumstances

- 3.402 Assessment of overall housing needs to inform an update to policy H1 will need to consider needs for different groups requiring housing, and this is likely to include needs for wheelchair housing, which should be incorporated into any update.

Conclusion

- 3.403 Policy H5 should be subject to update due to:
- The forthcoming introduction of the Future Homes Standard in the Building Regulations;
 - Changes to national policy that give local authorities more freedom in setting their own standards; and
 - Potential changes to the needs for wheelchair homes as a result of housing needs assessment.

H6: Accommodation for Vulnerable People

- 3.404 This policy aims to deal with proposals for specialist residential accommodation for vulnerable people, including older people and people with disabilities. It identifies the amount of residential care accommodation required over the plan period.

Legislative changes

- 3.401 There have been no legislative changes that affect this policy.

National policy changes

- 3.402 There have been no national policy changes that affect this policy. However, it is worth being mindful that the consultation on proposed changes to the NPPF published in December 2022 suggests placing greater priority on the provision of homes to meet the needs of the ageing population, including in retirement housing and residential care. Whilst these changes are not yet in place, the direction of travel is clear, and this may mean a need to update the policy.

Other policy changes

- 3.403 Reading's new Corporate Plan 2022-25 highlights a home first approach to adult social care to ensure that residents can remain at home as long as possible, including Technology Enabled Care. Policy H6 therefore continues to be in line with the overall approach.
- 3.404 The Council's Housing Strategy 2020-2025 considers the needs of adults with additional needs who are unable to remain in their own homes. It identifies that, whilst no one option fits all situations, the following options are required:
- Nursing Care - high level support including medical interventions.
 - Residential Care - 24 hours support, including personal care, without individual tenancies.
 - Extra Care Housing - Residents have individual properties and tenancies, support provided on site.
 - Supported Living - residents live independently with support purchased separately.
 - Shared Lives - Individuals live with approved carers.

This in itself does not lead to a need to update the policy, which continues to be broadly in line with the approach.

Monitoring data

- 3.405 So far in the plan period up to 31st March 2022, a net decrease of 57 bedspaces of residential care had been delivered, with a net increase of 169 bedspaces having outstanding planning permission. The total committed and completed net change of 112 bedspaces represents 44% of the identified need of 253 bedspaces in Reading.

Appeals

- 3.406 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.407 Data from the 2021 Census confirms that Reading's population is ageing. The number of people aged 65 or more has increased by around 18% from 17,832 in 2011 to 20,981 in 2021, which increases the proportion of the population in this age group from 11.5% to 12.0%.
- 3.408 The supporting evidence on the need for older people's housing was set out in the SHMA, and assumed an ageing population. It is possible to use the Census figures to judge whether the assumed rates of change set out in Table 110 of the SHMA have been borne out so far.

Table 3.2: Expected growth in older age groups compared to Census results

	Age 65-74	Age 75-84	Age 85+	Total 65+
2013 population (SHMA)	9,482	6,254	2,744	18,480
2013-2036 expected growth (%) (SHMA)	50.4	54.6	130.6	63.5
2036 expected population (SHMA)	14,261	9,669	6,328	30,215
2021 expected population based on consistent year on year increase (SHMA)	11,144	7,442	3,990	22,562
2021 population (Census)	11,148	6,938	2,895	20,981

- 3.409 Table 3.2 shows that, whilst the expected increase in the 65-74 age group is being borne out so far, the increase in the older age groups, in particular the 85+ group, is not currently as strong as anticipated, meaning that the overall number of people over 65 is also increasing somewhat slower than expected. This does not in itself necessarily invalidate the policy approach, but as overall housing needs require reconsideration in any case, factoring in the Census results in terms of housing for older groups (as well as others) will also be necessary.

Conclusion

- 3.410 Policy H6 should be subject to update due to:
- The need to reassess overall housing needs under policy H1, of which the need for accommodation for vulnerable people will need to be assessed as a component; and
 - Forthcoming changes to national policy placing greater priority on housing for the ageing population.

H7: Protecting the Existing Housing Stock

- 3.411 This policy aims to ensure that development does not reduce the existing housing stock within Reading through loss of existing homes.

Legislative changes

- 3.412 There have been no legislative changes that affect this policy.

National policy changes

3.413 There have been no national policy changes that affect this policy.

Other policy changes

3.414 There have been no other policy changes that affect this policy.

Monitoring data

3.415 Since 1st April 2018, there have been 33 developments granted permission that would lead to a net loss of class C3 dwellinghouses, excluding certificates of lawfulness where a policy judgement is not relevant. Of these, the loss would be for the following:

- 26 would result in an alternative form of residential accommodation, with 21 being for provision of a large HMO and 5 being for provision of class C2 residential care;
- 2 would result in the provision of or expansion of medical facilities;
- 1 would result in the provision of serviced apartments; and
- 4 arise due to the conversions of multiple dwellings (usually flats) to a single dwelling.

3.416 Therefore, permissions that would result in the loss of dwellings and would not replace them with some alternative form of residential accommodation have been relatively rare. Whilst conversions of flats back to a single dwelling does lead to a net loss of dwellings, it can also help to achieve other aims such as the provision of family housing. It is not therefore considered that monitoring highlights a need to revise the policy.

Appeals

3.417 This policy was relevant to two appeal decisions since the plan was adopted and neither of these decisions have indicated any need to amend or update the policy.

Other changes in circumstances

3.418 There have been a small albeit increasing number of proposals to convert flats into larger dwellings. Given the degree to which needs for family housing are not being met within the Borough, there may be a case to allow such conversions to be considered an exception to the policy approach where they result in family housing of three bedrooms or more. This should be considered in an update to the policy, particularly given the monitoring in relation to policy H2 demonstrating the lack of delivery of family housing to meet needs.

Conclusion

3.419 Policy H7 should be subject to update due to:

- The need to consider an exception for changes from flats back to a single family sized dwelling.

H8: Residential Conversions

- 3.420 This policy aims to set out expectations for proposals to convert existing dwellings into flats or into a house of multiple occupation (HMO).

Legislative changes

- 3.421 There have been no legislative changes that affect this policy.

National policy changes

- 3.422 There have been no national policy changes that affect this policy.

Other policy changes

- 3.423 A Draft Residential Conversions SPD was published for consultation in December 2022, and is expected to be adopted in March 2023. Whilst this document supplements the existing policy H8, it does include some elements which could usefully be included within an updated policy to ensure that the approach to residential conversions is as clear as possible. In particular, this relates to clarification of details of how the threshold approach to proposals for HMOs within the Article 4 area will be applied, and a more specific criteria-based approach to proposals to convert houses to HMOs or flats outside the Article 4 area. The policy should be updated to include these matters.

Monitoring data

- 3.424 Between the submission of the Local Plan in March 2018 and 31st March 2022, a net gain of 94 dwellings has been delivered through conversions of houses to smaller dwellings.
- 3.425 Over the same period, 287 bedspaces within large HMOs (7 or more occupants) have been delivered through changes of use or conversions from dwellinghouses or small HMOs.
- 3.426 The monitoring data does not on its own particularly indicate a need for an update to the policy.

Appeals

- 3.427 This policy was relevant to eight appeal decisions since the plan was adopted. Most of these decisions have not indicated any need to amend or update the policy. However, there were some important points to factor into any update. Firstly, one decision did consider that the 25% threshold approach, whilst not directly relevant outside the Article 4 area, was nonetheless of use in determining whether the character of an area was likely to change as a result of an HMO proposal. There is a need for an update to be clearer on this matter.
- 3.428 Secondly, there was a case where a decision considered that a previous approval for conversion from a house to flats meant that the principle of loss of family accommodation had already been established and that a conversion to HMO was therefore acceptable. This is not the intention of the policy, because a policy

compliant conversion of houses to flats should retain at least one family-sized unit. This requires clarification within any update to the policy.

- 3.429 Finally, there may be a need for strengthening of the provisions on stacking, as one appeal decision has considered it is acceptable for bathrooms to be located at upper floors above habitable rooms subject to a condition requiring submission of soundproofing details.

Other changes in circumstances

- 3.430 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.431 Policy H8 should be subject to update due to:
- Work undertaken on the Residential Conversions SPD, which has particularly identified the need to formalise the approach outside the Article 4 area; and
 - Issues arising in appeal decisions including regarding stacking and the application of the threshold approach.

H9: House Extensions and Ancillary Accommodation

- 3.432 This policy aims to set out expectations for proposals for house extensions or for other householder development, including ancillary accommodation such as granny annexes.

Legislative changes

- 3.433 There have been no legislative changes that affect this policy.

National policy changes

- 3.434 There have been no national policy changes that affect this policy.

Other policy changes

- 3.435 In March 2021, a new Design Guide to House Extensions SPD was adopted. This document replaced the previous version that had been in place since 2003, and provides a useful guide for householders on making applications for house extensions and other householder development. It is written to supplement the existing policy H9, and is therefore fully in conformity with the policy. Although a mention can be made in the supporting text, this does not affect the soundness of the policies and can be made without a full policy update.

Monitoring data

- 3.436 There is no monitoring data associated with this policy.

Appeals

- 3.437 This policy was relevant to 16 appeal decisions since the plan was adopted and none of these decisions have indicated any need to amend or update the policy.

Other changes in circumstances

- 3.438 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.439 No changes have been identified that result in the need to update policy H9.

H10: Private and Communal Outdoor Space

- 3.440 This policy aims to set out the approach to the provision of private or communal outdoor space as part of residential developments, and ensure that sufficient functional space of a good quality is provided.

Legislative changes

- 3.441 There have been no legislative changes that affect this policy.

National policy changes

- 3.442 There have been no national policy changes that affect this policy.

Other policy changes

- 3.443 There have been no other policy changes that affect this policy.

Monitoring data

- 3.444 There is no monitoring data associated with this policy.

Appeals

- 3.445 This policy was relevant to twelve appeal decisions since the plan was adopted and none of these decisions have indicated any need to amend or update the policy.

Other changes in circumstances

- 3.446 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.447 No changes have been identified that result in the need to update policy H10.

H11: Development of Private Residential Gardens

- 3.448 This policy aims to set criteria for the consideration of proposals for new residential development within the curtilage of private residential gardens.

Legislative changes

- 3.449 There have been no legislative changes that affect this policy.

National policy changes

- 3.450 There have been no national policy changes that affect this policy.

Other policy changes

- 3.451 There have been no other policy changes that affect this policy.

Monitoring data

- 3.452 Over the plan period so far from 2013 to 2022, there were 88 new dwellings completed on land formerly in use as private residential gardens, averaging 10 per year. This is a relatively low number compared to previous years, particularly the years prior to 2010. The average for the period between 2002 and 2013 was 24 per year. It seems that residential gardens are becoming less important as a source of housing supply in Reading. Since this reduction happened around 2010, before any specific policy on this form of development was introduced, it is considered that it is unlikely to be due to the policy. The policy does not seek any specific outcome in terms of an increase or reduction in number of homes from this source, rather allows for each proposal to be considered on its merits, so this does not indicate a particular need to update the policy.

Appeals

- 3.453 This policy was relevant to eight appeal decisions since the plan was adopted and none of these decisions have indicated any need to amend or update the policy.

Other changes in circumstances

- 3.454 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.456 No changes have been identified that result in the need to update policy H11.

H12: Student Accommodation

- 3.457 This policy aims to deal with proposals for new student accommodation, and sets out a sequential approach with first preference for existing further or higher education sites or existing accommodation sites.

Legislative changes

- 3.458 There have been no legislative changes that affect this policy.

National policy changes

- 3.459 The NPPF currently states that, when assessing the need for homes in their area, local planning authorities should assess the need for housing for students, which was not present in the 2012 version against which the plan was examined. The need for student accommodation was however assessed in the 2016 Strategic Housing Market Assessment to support the Local Plan, although there was significant evolution of this matter through the examination, and this is therefore incorporated in the policy. The need for accommodation is heavily dependent on the situation at the University of Reading, and the section on monitoring data below considers this matter further.

Other policy changes

- 3.460 There have been no other policy changes that affect this policy.

Monitoring data

- 3.461 Over the plan period up to 31st March 2022, a net gain of 688 student bedspaces was delivered. Of these, 206 were completed since the Local Plan was examined in 2018/19, which is when the identified need of 1,000 dwellings was based. A further 72 student bedspaces have outstanding planning permission.
- 3.462 Data on student numbers is monitored by the Higher Education Statistics Authority and is available on their website, and this includes data for individual institutions⁷. This can be used to understand changes that might affect policy H12 between 2017 and 2022. Much of the evidence provided by the University of Reading to the Local Plan examination covered the period up to the 2016/17 academic year, whilst the most recent data published is for 2021/22.
- 3.463 It is worth bearing in mind the impacts that Covid is likely to have had on student figures for the years from 2020 onwards, as well as on the more detailed characteristics of those students, and to be careful about drawing too many conclusions about the degree to which future change will see a continuation of these patterns, but it is nonetheless worth considering the data.
- 3.464 The headline figure is that between 2017 and 2022, the number of students enrolled at the UoR has grown by 14% from 16,995 to 19,390. In overall terms therefore, the student growth, whilst less than was seen over the previous 5-year period (21%), is well on track to meet the 21,000 students by 2028 that the UoR predicted in the information submitted to the Local Plan examination.
- 3.465 However, what is also apparent from the figures is that the growth has been driven by part-time students, and that the number of full-time students has actually slightly decreased at the UoR between 2017 and 2022. This was a pre-Covid trend, with annual growth in full-time students of 0.2% in both 2018-19 and 2019-20. Full-time students are those most likely to require accommodation in Reading, which is why the information submitted by the UoR used figures for full-time students in particular in arguing for provision of purpose-built student accommodation (PBSA). This part-time growth also appears to be almost entirely in postgraduate students, with the number of undergraduate students barely changing at all over the five-year period.
- 3.466 Another major expected component of PBSA need in the UoR's evidence arose from international students, who would be expected to be particularly reliant on such accommodation. However, over the last five years the number of UoR students domiciled outside the UK has also declined, by around 10%. Again, Covid is likely to have had some impacts here, but it is worth noting that the number of international students had been fairly static between 2017/18 (4,365) and 2019/20 (4,475) even before any Covid impacts.

⁷ [Where do HE students study? | HESA](#)

- 3.467 A particular factor worthy of note in the HESA figures for the UoR is the growth of distance learning, which has grown year-on-year from 420 in 2017/18 to 1,655 in 2021/22. These are unlikely to be groups requiring accommodation in Reading.
- 3.468 HESA also collects data on the location of residence of students enrolled at the UoR. It shows that there has been no growth in students residing in University accommodation, which is unsurprising given that there has been no recent change in number of University bedspaces and such accommodation is at capacity. There are no clear trends in other forms of accommodation, as the figures show these fluctuating quite significantly from year to year, which perhaps calls the reliability of the figures into question. There is certainly no data that conclusively shows an increase in students residing in HMOs (classified mainly under ‘other rented’ accommodation), and there appear to have been increases in students staying with a parent/guardian or in their own permanent accommodation.
- 3.469 In conclusion, despite the headline growth in student numbers at the UoR, there is no indication of any significant increase in the students most likely to require PBSA, which are full-time and international students, and therefore it is not considered that the data points towards a need to update the policy.

Appeals

- 3.470 There have been two appeal decisions in which this policy was of relevance, both for new purpose built student accommodation on sites that are not preferred by the policy. Both appeals were dismissed on the basis of a lack of demonstration that there were not sufficient sequentially preferable sites to meet the need, and thus supported the policy approach.

Other changes in circumstances

- 3.471 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.472 No changes have been identified that result in the need to update policy H12.

H13: Provision for Gypsies and Travellers

- 3.473 This policy aims to identify levels of need for sites for gypsy, traveller and travelling showpeople accommodation, as well as set out criteria for consideration of proposals for new development for this use.

Legislative changes

- 3.474 There have been no legislative changes that affect this policy.

National policy changes

- 3.475 National planning policy is set out in Planning Policy for Traveller Sites, which has been in place since 2012 and which has not been updated since the Local Plan was prepared.

Other policy changes

- 3.476 The Wokingham Local Plan Update went through consultation on a full draft between February and April 2020. Draft policy H11 identifies a need for 10-74 permanent pitches (after permissions are taken into account), and identifies sufficient sites to deliver 24 pitches, meaning that the lower end of Wokingham's need is expected to be met, but no provision is made for Reading's unmet needs. A call for sites for gypsy and traveller accommodation was commenced in January 2023.
- 3.477 The Bracknell Forest Local Plan was submitted in December 2021. This identifies a need for eight permanent sites for gypsies and travellers (based on cultural need) and provides for this need to be met in the Jealott's Hill allocation. There is no unmet need arising, and no flexibility to accommodate need from elsewhere.
- 3.478 The West Berkshire Local Plan Review Proposed Submission was published for consultation in January 2023. This identifies a need for 20-30 permanent pitches for gypsies and travellers and 24 plots for travelling showpeople over the plan period, but only allocates 8 permanent pitches. The proposal is that a specific development plan for gypsies and travellers will be developed, so at this stage it is not known whether unmet need would arise or whether there would be scope to accommodate any unmet needs from Reading.
- 3.479 The South Oxfordshire Local Plan 2011-2035 (adopted 2020) identifies a need for 10 permanent pitches for gypsies and travellers up to 2033, and the plan addresses this need by including this within three strategic allocations. No unmet need is identified, and no additional supply is identified to meet Reading's unmet needs.

Monitoring data

- 3.480 No additional permanent pitches for gypsies and travellers or plots for travelling showpeople have been completed or permitted within Reading over the plan period. One transit site for gypsies and travellers containing seven pitches received a resolution to grant planning permission during 2022 (although the permission has not yet been issued), and, once completed, would meet the identified transit needs in full.

Appeals

- 3.481 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.482 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.483 No changes have been identified that result in the need to update policy H13.

H14: Suburban Renewal and Regeneration

- 3.484 This policy aims to set out the approach to proposals for renewal and regeneration of Reading's suburban residential areas to improve the environment and housing stock and deliver more homes.

Legislative changes

- 3.485 There have been no legislative changes that affect this policy.

National policy changes

- 3.486 There have been no national policy changes that affect this policy.

Other policy changes

- 3.487 The Council's Housing Strategy 2020-2025 identifies that, in terms of residents of Council-owned housing estates, there is a clear message that, although there is satisfaction with the quality of homes, improvements to wider neighbourhoods are required. This accords with the policy ambition in H14 to improve the local built environment.

Monitoring data

- 3.489 There is no monitoring data associated with this policy.

Appeals

- 3.490 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.491 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.492 No changes have been identified that result in the need to update policy H14.

TR1: Achieving the Transport Strategy

- 3.493 This policy aims to ensure that developments contributes to meeting the objectives of the transport strategy and contributes towards sustainable transport measures.

Legislative changes

- 3.494 There have been no legislative changes that affect this policy.

National policy changes

- 3.495 Although the sustainable transport sections of the NPPF have been significantly rewritten between 2012 and 2021, the overall approach in terms of how it affects this policy remains largely the same, and continues to support the approach to promotion of sustainable modes and the need for developments to be accompanied by a transport assessment.

Other policy changes

- 3.496 The Reading Transport Strategy 2040 (LTP4) is expected to be adopted during 2023. This will contain a range of objectives and policies that will be of fundamental importance to this policy. It is highly likely that the contents of LTP4 will need to be reflected in an update to this policy.
- 3.497 The Local Cycling and Walking Infrastructure Plan (LCWIP) was published in March 2020 and was developed in partnership with Wokingham Borough Council and West Berkshire District Council. The LCWIP forms a sub-strategy to the transport strategy aiming to help deliver plans to increase walking and cycling usage. It identifies a network of both walking and cycling routes, falling under different categories, each of which has differing measures associated with it.
- 3.498 The Corporate Plan 2022-25 emphasises the importance of active travel in meeting achieving the ‘healthy environment’ theme of the Council’s vision. This is very much already part of the approach of TR1.
- 3.499 The Corporate Plan, under the theme of ‘inclusive economy’ highlights the importance of moving Reading towards becoming a ‘smart city’ through programmes such as the ADEPT Live Labs initiative and continued delivery of a £4.75 million grant trial to help futureproof roads and transport. Specific matters that relate to this would be for the Local Transport Plan, but may need to be reflected in some updates to this policy.
- 3.500 The Reading Climate Emergency Strategy, published in 2020, identifies a number of actions across a number of partners to address the climate emergency. This includes a large number of actions within the Transport theme. These are to be actioned through the Local Transport Plan, and are therefore dealt with above.
- 3.501 The Thames Valley Berkshire Recovery and Renewal Plan, published in 2020, emphasises the importance of connectivity around Berkshire. In the long term, once post-Covid commuting patterns are understood, it identifies the need to create flexible and connected transport options to reflect this.

Monitoring data

- 3.502 There is no monitoring data associated with this policy.

Appeals

- 3.503 This policy was relevant to three appeal decisions since the plan was adopted and none of these decisions have indicated any need to amend or update the policy.

Other changes in circumstances

- 3.504 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.505 Policy TR1 should be subject to update due to:
- Expected changes to the overall transport strategy due to the publication of a number of documents, in particular the Local Transport Plan.

TR2: Major Transport Projects

- 3.506 This policy identifies the major transport projects from the Local Transport Plan and prioritises their implementation.

Legislative changes

- 3.507 There have been no legislative changes that affect this policy.
- 3.508 A safeguarding direction for Crossrail was issued on 29 April 2009, including land within Reading, which is referred to in the supporting text. Elizabeth Line services are now running to Reading, and the land covered by the direction and shown on the Proposals Map has not been required. However, the direction has not been formally withdrawn. The supporting text should be updated with the most up-to-date situation.

National policy changes

- 3.509 There are no national policy changes that significantly affect this policy.

Other policy changes

- 3.510 The Reading Transport Strategy 2040 (LTP4) is expected to be adopted during 2023. This will very likely contain a range of schemes and initiatives that will differ in part from the previous Local Transport Plan and therefore this policy, meaning that it is highly likely that the contents of LTP4 will need to be reflected in an update to this policy.
- 3.511 The Wokingham Local Plan Update went through consultation on a full draft between February and April 2020, and there was a subsequent consultation on a Revised Growth Strategy. The draft plan continued to identify corridors for high quality express bus services or dedicated public transport route along the A4 and A329 corridors, improvements to highway capacity along the A33 and the Third Thames Crossing, which means it is broadly in accordance with the transport projects identified in the existing policy. No further transport schemes were identified that had cross-boundary implications for Reading.
- 3.512 The Revised Growth Strategy identified a site for 4,500 homes on the edge of Reading urban area at Hall Farm/Loddon Valley, and it would include a “comprehensive package of infrastructure to incentivise sustainable behaviours and travel choices”, as well as a new link across the M4. However, there is limited detail on the likely significant transport infrastructure required, and no indication that policy TR2 requires an update to accommodate this proposal.
- 3.513 The West Berkshire Local Plan Review Proposed Submission was published in January 2023. This contains no proposals for significant transport infrastructure in the vicinity of Reading, and does not mention the particular cross-boundary measures referred to in the Reading Borough Local Plan of park and ride corridors along the A4 and A329 connected by mass rapid transit or dedicated bus routes.
- 3.514 The South Oxfordshire Local Plan 2011-2034 was adopted in December 2020. It does not safeguard land or identify sites for those major transport projects that

would cross the boundary between Reading and South Oxfordshire, specifically the crossing of the Thames and the park and ride corridors. There is a general acknowledgement of the joint working on examining the potential for an additional crossing as well as improving park and ride generally.

Monitoring data

3.515 There is no monitoring data associated with this policy.

Appeals

3.516 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

3.517 Some of the major transport schemes listed in the policy have now been delivered, and there is no need to refer to, or, where applicable, safeguard land, for them:

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

3.518 The stretch of the M4 Smart Motorway within Reading Borough, referred to in the supporting text, was opened in December 2021. Reference to this can be removed from the plan.

3.519 In terms of safeguarding for Crossrail, Elizabeth Line services began running to Reading in 2022. There is not known to be any further need for the land in Reading covered by the safeguarding direction to be used.

Conclusion

3.520 Policy TR2 should be subject to update due to:

- Progress and completion of many of the major transport projects listed; and
- Publication of the Local Transport Plan including additional or amended major transport projects.

TR3: Access, Traffic and Highway-Related Matters

3.521 This policy aims to ensure that the creation of new transport infrastructure or the generation of additional trips on the transport network will give consideration to the effect on safety, congestion and the environment.

Legislative changes

3.522 There have been no legislative changes that affect this policy.

National policy changes

- 3.523 Although the transport sections of the NPPF have been significantly rewritten between 2012 and 2021, the overall approach in terms of how it affects this policy remains largely the same.
- 3.524 There is an expectation that Manual for Streets will be replaced with a new version at some point, which may be during the progression of the partial update. At this stage, there is no identified need to update the policy, but if a new version has implications for the policy this may need to be reviewed.

Other policy changes

- 3.525 There have been no other policy changes that affect this policy.

Monitoring data

- 3.526 There is no monitoring data associated with this policy.

Appeals

- 3.527 This policy was relevant to 15 appeal decisions since the plan was adopted and none of these decisions have indicated any need to amend or update the policy. In one case the decision hinged on the safety of the arrangement of a cycle link, and the decision disagreed with the Council's position, but this was a very specific issue that a change to the policy would be unlikely to address.

Other changes in circumstances

- 3.528 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.529 No changes have been identified that result in the need to update policy TR3.

TR4: Cycle Routes and Facilities

- 3.530 This policy aims to ensure that opportunities are taken to improve cycling access, and identifies cycle routes that should be maintained, enhanced or extended, linked to the most recent Cycling Strategy.

Legislative changes

- 3.531 There have been no legislative changes that affect this policy.

National policy changes

- 3.532 Although the 2012 version of the NPPF did support the promotion of cycling (and walking), this has been substantially strengthened in the most recent version. The 2021 version recognises the importance of building walking and cycling into design to creating healthy communities. It also contains a clear statement that plans should *“provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans)”*.

- 3.533 For planning applications, the NPPF (paragraph 112) now also prioritises movement for pedestrians and cyclists over access to high quality public transport.

Other policy changes

- 3.534 The Corporate Plan 2022-25 emphasises the importance of active travel in meeting achieving the ‘healthy environment’ theme of the Council’s vision. This is very much already part of the approach of TR3.
- 3.535 The Reading Transport Strategy 2040 (LTP4) is expected to be adopted during 2023. It will need to cover cycling alongside other modes of sustainable transport, and as such it is likely that its content will need to be reflected in updates to this policy.
- 3.536 The Local Cycling and Walking Infrastructure Plan (LCWIP) was published in March 2020 and was developed in partnership with Wokingham Borough Council and West Berkshire District Council. The LCWIP forms a sub-strategy to the transport strategy aiming to help deliver plans to increase walking and cycling usage. The LCWIP identifies a network of cycle routes, with five particular categories: town centre routes, strategic routes, orbital routes, local routes and leisure routes. Each of these categories has different measures associated with it and is geared towards different levels of cyclists. This network extends across the whole Reading urban area including areas outside Reading Borough. The network differs significantly from the identified network on the Proposals Map derived from the previous Cycling Strategy. Although TR4 allows for changes to the specific routes identified, there is likely to still be a need to update the policy to reflect the different measures included within the LCWIP.

Monitoring data

- 3.537 There is no monitoring data associated with this policy.

Appeals

- 3.538 This policy was relevant to one appeal decision since the plan was adopted and this did not indicate any need to amend or update the policy.

Other changes in circumstances

- 3.539 As set out in relation to policy TR2, the identified elements of National Cycle Network route 422 have now been delivered. This does not directly impact the policy, but will have been considered as part of the routes identified in the LCWIP.

Conclusion

- 3.540 Policy TR4 should be subject to update due to:
- Increased emphasis on cycling in national policy; and
 - Changes to the cycle network as a result of publication of the LCWIP.

TR5: Car and Cycle Parking and Electric Vehicle Charging

- 3.541 This policy aims to ensure that car and cycle parking appropriate to the level of accessibility of the site is provided as part of new developments, and ensure that electric vehicle charging is provided for specified developments.

Legislative changes

- 3.542 There have been no legislative changes that affect this policy.

National policy changes

- 3.543 The current NPPF includes a statement that maximum parking standards should only be set in specific circumstances, namely where there is a “*clear and compelling justification*” in terms of managing the local road network or optimising density in accessible locations. Although the policy wording itself is not expressed in terms of maximum standards, it does rely on a SPD which is based on such standards. As such, this will need to be considered as part of an update.
- 3.544 Another change is that the NPPF now talks of the importance of ensuring adequate spaces for charging and ultra low-emission vehicles. Although this is covered in the existing policy, the continued take-up of such vehicles is likely to mean a need to update the policy.
- 3.545 In addition, the NPPF now talks about the importance of providing adequate overnight lorry parking facilities, which is something not currently addressed in the Local Plan.

Other policy changes

- 3.546 The Reading Transport Strategy 2040 (LTP4) is expected to be adopted during 2023. It will need to cover ultra low-emission vehicles alongside other modes of sustainable transport, and as such it is likely that its content will need to be reflected in updates to this policy.

Monitoring data

- 3.547 There is no monitoring data associated with this policy.

Appeals

- 3.548 This policy was relevant to seven appeal decisions since the plan was adopted. In one case, there was an issue that potentially needs to be addressed through an update, in that the Council’s requirement for an on-site parking space was considered to conflict with the NPPF in terms of the justification for maximum parking standards for residential. The wording of the policy can be considered in order to address this issue.

Other changes in circumstances

- 3.549 There have been no other changes in circumstances that affect this policy.

Conclusion

3.550 Policy TR5 should be subject to update due to:

- Potential changes to the approach to ultra low-emission vehicle charging in LTP4;
- Changing national policy on parking standards, charging for ultra low-emission vehicles and lorry parking; and
- The result of an appeal relating to whether the approach of the policy accords with the NPPF.

RL1: Network and Hierarchy of Centres

3.551 This policy aims to identify the network and hierarchy of centres within the Borough, support changes that maintain and enhance the vitality and viability of those centres, and identify the centres that will see the greatest level of change.

Legislative changes

3.552 There have been no legislative changes that affect this policy.

National policy changes

3.553 There have been no national policy changes that affect this policy.

Other policy changes

3.554 The Wokingham Local Plan Update went through consultation on a full draft between February and April 2020. Policy ER6 identifies Shinfield Road, which straddles the boundary between Reading and Wokingham, as a district centre in line with policy RL1.

Monitoring data

3.555 There is no monitoring data associated with this policy. The overall net change in floorspace for retail, leisure and culture uses completed in individual centres between 1st April 2018 and 31st March 2022 is as follows:

- Reading centre: -19,846 sq m
- Caversham: +298 sq m
- Cemetery Junction: -1,499 sq m
- Christchurch Road: -111 sq m
- Oxford Road West: -368 sq m
- All other centres: no net change

3.556 In terms of outstanding permissions at 31st March 2022, the amount of outstanding permitted floorspace for retail, leisure and culture in each centre was as follows:

- Reading centre: +8,258 sq m
- Caversham: +1,677 sq m
- Oxford Road West: +7 sq m

- Whitley: +202 sq m
- All other centres: no net change

3.557 The changes set out above are not significant enough to justify any change to the overall network and hierarchy of centres.

Appeals

3.558 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

3.559 There have been no other changes in circumstances that affect this policy.

Conclusion

3.560 No changes have been identified that result in the need to update policy RL1.

RL2: Scale and Location of Retail, Leisure and Culture Development

3.561 This policy aims to identify the amount of retail, leisure and culture development that will be planned for and sets out the approach to where this development should be located.

Legislative changes

3.562 There have been no legislative changes that affect this policy.

National policy changes

3.563 There have been no national policy changes that affect this policy.

Other policy changes

3.564 There have been no other policy changes that affect this policy.

Monitoring data

3.565 In overall terms, there has been a net loss of 37,297 sq m of retail, leisure and culture floorspace over the plan period so far (2013 to 2022). This compares with the identified need of up to 34,900 sq m of floorspace set out in policy RL2. However, there are outstanding permissions that would deliver a net gain of 56,202 sq m of retail, leisure and culture floorspace in place at 31st March 2022 that would potentially lead to an overall net gain if all permissions were delivered. As the overall need is expressed as a maximum, the overall delivery of floorspace is not considered to represent a particular reason to update the policy.

3.566 Much of the net loss has taken place within designated centres, with the overall net change in floorspace within designated centres being a net loss of 22,262 sq m. Most of this has been within the town centre, and has included demolition of large retail warehouses to facilitate new development, which is part of the Local Plan strategy in any case.

- 3.567 In terms of distribution of development, the proportion of retail, leisure and culture floorspace completed between 2018 and 2022 that is within a designated centre is 58%. The majority is therefore within a designated centre, albeit that a significant minority is still completed in out of centre locations. The proportion of retail, leisure and culture floorspace permitted during the same period that is within a designated centre is much lower, at 46%. This is primarily due to one very large development permitted in 2018-19 at Royal Elm Park, which would deliver a significant amount of floorspace for hotel, leisure and retail - without this development the relevant proportion would have been 75%. It is not therefore considered that there is a particular need to update this aspect of the policy.

Appeals

- 3.568 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.569 The retail and leisure needs identified in the Western Berkshire Retail and Commercial Leisure Assessment were based on survey work undertaken in 2016 and are now therefore seven years old. Since then, there have potentially been significant changes to shopping patterns. The Assessment did account for an expansion of online retailing, but the rate of this change may well have significantly increased as a result of the Covid-19 pandemic, which may also have altered the balance between shopping in larger town centres as opposed to smaller district and local centres. Given the potential scale of these changes, it would make sense to carry out a review and potential update of this evidence, which will also mean a potential need to update the policy.

Conclusion

- 3.570 Policy RL2 should be subject to update due to:
- The need to reassess needs for retail and leisure development to take account of changes to shopping patterns, in particular to take the impact of Covid into account; and
 - Monitoring data that shows a net loss of retail floorspace compared to the gain that the policy seeks.

RL3: Vitality and Viability of Smaller Centres

- 3.571 This policy aims to manage the uses within the identified district and local centres, in particular ensuring that retail and financial and professional uses do not fall below a certain level, that takeaways are not permitted to over-concentrate, that there would be no ground floor loss of town centre uses and that additional town centre uses are provided where possible.

Legislative changes

- 3.572 On 1st September 2020, changes to the Use Classes Order came into force. This has particular implications for use classes within centres. In particular, a number of

formerly separate use classes were combined within a new use class E (Commercial, Business and Service). This includes shops (formerly A1)⁸, financial and professional services (A2), restaurants and cafes (formerly A3), offices, light industrial and research and development (formerly B1) as well as a number of community and leisure uses formerly within the D1 and D2 use classes. Changes of use within a single use class are not classed as development, and do not therefore require planning permission. In addition, drinking establishments (formerly A4) and hot food takeaways (formerly A5) are now classed as sui generis uses.

- 3.573 These changes substantially affect policy RL3, which makes specific reference to some of these use classes. In the case of the reference to A5 takeaways in criterion b), the updates required would be simply to change the reference, as the need for planning permission is not affected. However, in the case of the approach to A1 and A2, the changes are much more significant. The policy can no longer effectively retain those uses, because they could change to a wide range of other uses, including some such as office and light industrial that are not considered ‘centre uses’ at all according to the list in paragraph 4.6.16, without requiring planning permission. There is no scope to control such changes through an Article 4 direction, because those changes are not classed as development. Therefore, large parts of this policy can no longer be implemented, and an update is required.
- 3.574 Changes to the General Permitted Development Order (GPDO) have also been made since adoption of the plan, to extend permitted development rights. In particular, the new permitted development right to convert class E uses to residential that came into force on 1st August 2021 has potential implications for policy RL3. It allows for much more scope for conversion of ground floor town centre uses than previously existed, by, for instance:
- Expanding the right to uses not formerly affected such as restaurants and cafes and medical facilities;
 - Raising the size threshold that previously applied to retail and financial and professional uses from 150 sq m to 1,500 sq m; and
 - Removing safeguards in the conditions such as around the sustainability of the shopping area.
- 3.575 These changes therefore also potentially seriously impact the application of this policy, because many changes of ‘centre uses’ to ‘non-centre uses’ controlled by criterion b) would now be permitted development.
- 3.576 However, the Council made an Article 4 direction which came into force on 15th November 2022 which removes the permitted development rights that would result in the loss of commercial or associated sui generis uses for residential use from the entirety of all district and local centres in policy. The Secretary of State retains powers to modify or cancel the direction, but at the time of writing this had not occurred, which means that in the context of the changes to residential outlined above there is not a need to update the policy.

⁸ Unless the shop sells essential goods, is less than 280 sq m and there is no other such facility within a 1,000 m radius.

National policy changes

3.577 There have been no national policy changes that affect this policy.

Other policy changes

3.578 The Reading Climate Emergency Strategy, published in 2020, identifies a number of actions across a number of partners to address the climate emergency. This includes an action (T4) to improve the pedestrian experience in Central Reading and local centres by providing better access to key destinations for walking, cycling and bus passengers and green up the local environment to encourage use and enjoyment of local facilities. Policy RL3 is already in line with this action.

Monitoring data

3.579 The policy seeks to manage the proportion of key frontages within the centres that are in a specific use. This has been monitored in terms of pre-2021 use classes, with the last survey having been conducted in December 2021. The results are set out in Table 3.3.

Table 3.3: Proportion of key frontage in smaller centres in A1/A2 and A5 use, 2021

Centre	% A1/A2 target	% A1/A2 Actual	% A5 Target	% A5 Actual
Basingstoke Road North	50	59.6	30	15.7
Caversham	60	68.5	30	2.6
Cemetery Junction	60	64.1	30	14.0
Christchurch Road	60	72.0	30	13.6
Coronation Square	60	56.9	30	18.5
Dee Park	50	54.5	30	0.0
Emmer Green	50	57.9	30	20.1
Erleigh Road	50	64.9	30	8.8
The Meadway	50	48.3	30	11.9
Northumberland Avenue North	50	58.3	30	24.1
Oxford Road West	50	61.7	30	8.9
Shinfield Road	50	49.9	30	29.6
Tilehurst Triangle	60	74.6	30	8.2
Wensley Road	60	80.7	30	19.3
Whitley	60	68.3	30	17.8
Whitley Street	40	48.2	30	17.8
Whitley Wood	60	67.2	30	0.0
Wokingham Road	50	58.7	30	20.8

3.580 In only three of the centres did the proportion of A1 (shops) and A2 (financial and professional) uses in the key frontage fall below the policy minimum. None of the centres exceeded the maximum for A5 (takeaway) uses.

- 3.581 Levels of vacancy of shop units also provides a useful guide to the vitality and viability of centres. The most recent vacancy survey was also conducted in December 2021, and the results are set out in Table 3.4.

Table 3.4: Retail vacancy within defined centres, 2021

Centre	All shop units	Units vacant	% vacancy
Basingstoke Road North	17	0	0.0
Caversham	117	13	11.3
Cemetery Junction	7	45	15.6
Christchurch Road	14	2	14.3
Coronation Square	11	2	18.2
Dee Park	3	0	0.0
Emmer Green	20	0	0.0
Erleigh Road	14	1	7.1
The Meadway	27	6	22.2
Northumberland Avenue North	8	0	0.0
Oxford Road West	147	13	8.8
Shinfield Road	28	0	0.0
Tilehurst Triangle	69	4	5.8
Wensley Road	4	0	0.0
Whitley	29	2	6.9
Whitley Street	38	1	2.6
Whitley Wood	7	1	14.3
Wokingham Road	50	2	4.0
TOTAL	1,428	197	13.8

- 3.582 A useful rule of thumb is that up to 10% vacancy is to be expected to allow for some degree of churn of units. However, there are six smaller centres within Reading (Caversham, Cemetery Junction, Christchurch Road, Coronation Square, the Meadway and Whitley Wood) where this level is exceeded.

Appeals

- 3.583 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.584 There have been no other changes in circumstances that would affect this policy.

Conclusion

- 3.585 Policy RL3 should be subject to update due to:
- Changes to the Use Classes Order that affect the implementation of the policy;

- High levels of vacancy in certain centres that may indicate a need for a policy response;

RL4: Betting Shops and Payday Loan Companies

3.586 This policy aims to prevent clustering of betting shops and payday loan shops.

Legislative changes

3.587 There have been no legislative changes that affect this policy.

National policy changes

3.588 There have been no changes to national policy that would affect this policy.

Other policy changes

3.589 There have been no other policy changes that affect this policy.

Monitoring data

3.590 No applications for betting shops or payday loan shops have been determined since the Local Plan was adopted.

Appeals

3.591 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

3.592 There are no other changes in circumstances that affect this policy. No additional clusters of betting shops or payday lenders have arisen since the evidence to establish the original policy was assembled.

Conclusion

3.593 No changes have been identified that result in the need to update policy RL4.

RL5: Impact of Main Town Centre Uses

3.594 This policy aims to ensure that developments for additional town centre uses not within a town centre location over 1,000 sq m are accompanied by an assessment of their impact on existing centres.

Legislative changes

3.595 There have been no legislative changes that affect this policy.

National policy changes

3.596 There have been no changes to national policy that would affect this policy.

Other policy changes

3.597 There have been no other policy changes that would affect this policy.

Monitoring data

- 3.598 There is no monitoring data associated with this policy.

Appeals

- 3.599 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.600 There have been no other changes in circumstances that would affect this policy.

Conclusion

- 3.601 No changes have been identified that result in the need to update policy RL5.

RL6: Protection of Leisure Facilities and Public Houses

- 3.602 This policy aims to ensure that development does not result in the loss of existing leisure facilities or public houses unless this can be justified in accordance with set criteria.

Legislative changes

- 3.603 In 2020, there were amendments to the Use Classes Order which resulted in particular in a new use class E, which covered a number of uses such as offices and retail that were previously separate, and which includes indoor sport and recreation activities. This means that an application would no longer be required to change a use away from some forms of leisure to another commercial use, which limits some of the circumstances in which this policy could be applied.
- 3.604 In addition, new permitted development rights were introduced in 2020 that allow for conversions from use class E to residential, within certain parameters. Permitted development rights for changes of leisure uses to residential did not exist prior to this point. This makes it more difficult to control losses of leisure. However, an Article 4 direction has been in place since November 2022 that removes these permitted development rights within a number of areas including the town centre, district and local centres and a number of other commercial areas.
- 3.605 In general, although there have been some changes to the Council's ability to apply this policy, it will still be capable of being applied in the majority of cases, and it is not therefore considered necessary to update the policy.

National policy changes

- 3.606 There has been a very slight change to the wording in the NPPF relating to the loss of sports and recreational buildings and land, which is that the new version states that one of the criteria to allow for loss is that the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use, whereas the previous version referred to 'needs' as opposed to 'benefits'. However, as the policy always followed the spirit of this

provision rather than repeating the exact wording, this is not considered to require an update.

Other policy changes

- 3.607 There have been no other policy changes that affect this policy.

Monitoring data

- 3.608 Between the submission of the Local Plan in 2018 and 31st March 2022, there has been a slight decrease in floorspace within former use classes A4 (drinking establishments) and D2 (assembly and leisure) of 1,957 sq m. The decrease within identified centres has been smaller, totalling 543 sq m. Whilst the policy seeks to generally avoid decreases in leisure provision, outstanding permissions were in place at 31st March 2022 that would result in a net increase of 67,316 sq m. This does not therefore indicate a need to update the policy.

Appeals

- 3.609 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.610 There have been no other changes in circumstances that would affect this policy.

Conclusion

- 3.611 No changes have been identified that result in the need to update policy RL6.

OU1: New and Existing Community Facilities

- 3.612 This policy aims to deal with proposals for new community facilities, or that would affect existing community facilities. Community facilities for the purposes of this policy include health facilities, education and training facilities (at all levels), youth and community centres and meeting places, libraries, places of worship, civic and administrative facilities and recycling facilities and civic amenity sites.

Legislative changes

- 3.613 On 21st April 2021, amendments to Part 7, class M of the GPDO came into force that significantly expand the ability for schools, colleges, universities, hospitals and prisons to expand without requiring planning permission. This allows cumulative development of 25% of the existing footprint or a footprint of 250 sq m, whichever is the greater, within a number of other parameters including around height and proximity to the boundary. A prior approval process would be required for university sites only that would allow consideration of transport, design and appearance and heritage.
- 3.614 This change will mean that the influence that policy OU1 can wield over development for these types of use is much reduced. Other than reflect the facts, there is little that the policy can do to take this into account, unless this matter is to also be subject to an Article 4 direction, which is not expected to be the case in

the immediate future. There will still be many instances where permission is required due to a development exceeding the size parameters or due to it being within the curtilage of a listed building, or due to being a form of community facility not covered by these changes, and in these circumstances the policy would continue to apply.

National policy changes

- 3.615 The main change in relation to this topic in the NPPF is that the most recent version now emphasises the need to ensure faster delivery of public service infrastructure, there is a need for local authorities to work proactively with promoters, delivery partners and statutory bodies to plan for facilities before applications are submitted. This is something that will need to be undertaken more broadly as part of the update, but this is not likely to affect the content of the policy itself.

Other policy changes

- 3.616 There have been no other policy changes that affect this policy.

Monitoring data

- 3.617 Between the submission of the plan in 2018 and 31st March 2022, there has been a small net increase in community use floorspace within the old D1 use class of 4,327 sq m.

Appeals

- 3.618 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.619 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.620 No changes have been identified that result in the need to update policy OU1.

OU2: Hazardous Installations

- 3.621 This policy aims to ensure that proposals that would involve hazardous substances, or development in the vicinity of hazardous sites, would not pose adverse health and safety risks.

Legislative changes

- 3.622 There has been a significant change in the legislation around sites that handle radioactive material in the form of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPPIR 2019). These changes had particular implications for development in the vicinity of the Atomic Weapons Establishment (AWE) Burghfield, which sits in West Berkshire just over 1.5 km from the boundary with Reading.

- 3.623 These changes did not result in any changes to operations on the site, but instead changed how risk is taken into account. As a result, the Detailed Emergency Planning Zone (DEPZ) around AWE Burghfield was significantly extended, and it now includes areas within Reading west of the A33 and south of the Kennet and Avon Canal. Within that area, the key consideration is whether any new development can be accommodated within the Off-Site Emergency Plan. This presents a substantial constraint on new development in the DEPZ, particularly residential development. This change will need to be reflected in revisions to policy OU2.

National policy changes

- 3.624 There have been no national policy changes that significantly affect this policy.

Other policy changes

- 3.625 There have been no other policy changes that affect this policy.

Monitoring data

- 3.626 The DEPZ for AWE Burghfield was extended to include areas of Reading in 2020. Between 2020 and 2021, 88 dwellings were built in the DEPZ area. These were all permitted prior to the extension of the DEPZ.
- 3.627 Between 2013 and 2021, there has been a net gain of 1,099 dwellings and 67,478 sq m of non-residential floorspace within the outer consultation zone for AWE Burghfield. This covers a significant part of the Reading urban area, so it is not surprising that development has continued.
- 3.628 The monitoring data does not reveal a need to update the policy in itself, but should be taken into account in an update resulting from the DEPZ extension.
- 3.629 There have been no applications for hazardous substances consent since the Local Plan was submitted.

Appeals

- 3.630 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.631 There have been no changes to the Control of Major Accident Hazard (COMAH) sites within Reading since the Local Plan was adopted. No hazardous substance consents have been granted in this period.

Conclusion

- 3.632 Policy OU2 should be subject to update due to:
- Changes in legislation that have resulted in an extension to the DEPZ for AWE Burghfield.

OU3: Telecommunications Development

- 3.633 This policy aims to set out criteria for assessing proposals for telecommunications development.

Legislative changes

- 3.634 The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022 came into force on 4th April 2022. This made a number of changes to permitted development rights related to development for telecommunications. In particular, the following changes were made:
- Enabling more significant provision of radio housing;
 - Allowing for widening and increasing the height of existing ground-based masts;
 - Additional height for building-based masts;
 - Increase in the height limit for new ground-based masts;
 - Strengthening the conditions on the siting and visual impacts of development

National policy changes

- 3.635 There have been some subtle changes to national policy on telecommunications infrastructure that would need to be considered as part of any update. The 2021 NPPF makes specific reference to 5G technology as well as technology necessary for the roll-out of smart cities, and states that planning policies should support the expansion of electronic communications networks. In addition, the NPPF now states that, when considering the need to keep masts to a minimum, this should take into account “*providing reasonable capacity for future expansion*”, which is not referred to in the 2012 version.

Other policy changes

- 3.636 The Thames Valley Berkshire Recovery and Renewal Plan, published in 2020, strongly emphasises the importance of digital connectivity in long term renewal of the area. Whilst not all of this will be provided by development which falls within this policy, it nonetheless underlines the need for further telecommunications development.

Monitoring data

- 3.637 There is no monitoring data associated with this policy.

Appeals

- 3.638 This policy was relevant to four appeal decisions since the plan was adopted and none of these decisions have indicated any need to amend or update the policy. The need for an adequate assessment of alternative sites has been particularly reinforced through appeals.

Other changes in circumstances

- 3.639 The roll-out of 5G telecommunications infrastructure has begun in Reading since the Local Plan was adopted. Masts and infrastructure tend to be larger and more conspicuous, and there are new requirements in terms of location of infrastructure. This has represented a particular challenge in Reading, with many proposals having been refused due to the impacts of these proposals on the local area. Although many of the general principles in policy OU3 are likely to continue to be important, there is nevertheless a need to incorporate this into any update of the policy.

Conclusion

- 3.640 Policy OU3 should be subject to update due to:
- The roll-out of 5G communications infrastructure;
 - New permitted development rights for telecommunications; and
 - Changes to national and other policies relating to telecoms.

OU4: Advertisements

- 3.642 This policy aims to set out criteria for assessing proposals for advertisements.

Legislative changes

- 3.643 There have been no legislative changes that affect this policy.

National policy changes

- 3.644 National policy in the NPPF on advertisements has been somewhat slimmed down since the 2012 version, but the content has not changed in a way that necessitates any update to the policy.

Other policy changes

- 3.645 There have been no other policy changes that affect this policy.

Monitoring data

- 3.646 There is no monitoring data associated with this policy.

Appeals

- 3.647 This policy was relevant to one appeal decision since the plan was adopted and this did not indicate any need to amend or update the policy.

Other changes in circumstances

- 3.648 There have been no other changes in circumstances that would affect this policy.

Conclusion

- 3.649 No changes have been identified that result in the need to update policy OU4.

OU5: Shopfronts and Cash Machines

- 3.650 This policy aims to set out criteria for assessing proposals for new or altered shopfronts and for provision of cash machines.

Legislative changes

- 3.651 There have been no legislative changes that affect this policy.

National policy changes

- 3.652 There have been no national policy changes that affect the need to update this policy.

Other policy changes

- 3.653 The Council adopted a Design Guide to Shopfronts SPD in January 2022. This provides policy and guidance to supplement policy OU5 to raise the quality of shopfronts across the town. The SPD is drafted to be in compliance with policy OU5, and as such it does not necessitate any update to the policy. Although a mention can be made in the supporting text, this does not affect the soundness of the policies and can be made without a full policy update.

Monitoring data

- 3.654 There is no monitoring data associated with this policy.

Appeals

- 3.655 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.656 A High Street Heritage Action Zone programme in parts of central Reading, funded by Historic England and the Council, commenced in 2020 and will run until 2024. This includes streets such as Oxford Road, St Mary's Butts, Castle Street, Market Place and London Street. Part of the programme includes grants for shopfront improvements within the zone. However, these improvements should be in line with policy OU5 and do not necessitate any update to it.

Conclusion

- 3.657 No changes have been identified that result in the need to update policy OU5.

CR1: Definition of Central Reading

- 3.658 This policy aims to define the centre of Reading, including for different uses to enable application of the sequential approach as set out in the NPPF.

Legislative changes

- 3.659 There have been no legislative changes that affect this policy.

National policy changes

- 3.660 There have been no national policy changes that affect the need to update this policy.

Other policy changes

- 3.661 There have been no other policy changes that affect this policy.

Monitoring data

- 3.662 There is no monitoring data associated with this policy.

Appeals

- 3.663 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.664 There have been no other changes in circumstances that would affect this policy.

Conclusion

- 3.665 No changes have been identified that result in the need to update policy CR1.

CR2: Design in Central Reading

- 3.666 This policy aims to set out additional policy requirements further to policy CC7 regarding design within Central Reading.

Legislative changes

- 3.667 There have been no legislative changes that affect this policy.

National policy changes

- 3.668 There have been significant changes to national policy relating to design, including the introduction of design codes and the publication of the National Design Guide and the National Model Design Code. These are examined in detail in relation to policy CC7. Policy CR2 is not a comprehensive design policy for the centre, instead reflecting on some specific elements that are of particular relevance for the centre. Nonetheless, if CC7 is to be part of an update as a result of these changes, it makes sense for CR2 to also be incorporated into this update.

Other policy changes

- 3.669 There have been no other policy changes that affect this policy.

Monitoring data

- 3.670 There is no monitoring data associated with this policy.

Appeals

- 3.671 This policy was relevant to two appeal decisions since the plan was adopted. One of these decisions had particular implications for this policy.

- 3.672 One part of the decision focused on the use of the term ‘existing grid’ and therefore the fact that the existing grid shows considerable fragmentation from the original grid was of relevance. The intention of the policy is to reinstate the grid where possible, and therefore the wording ‘existing grid’ does not entirely accord with what the policy is trying to achieve, which should be addressed in an update.
- 3.673 The same decision highlighted another issue where the conditions of the site meant that two important aspects of town centre policy - provision of active frontages and providing a direct north-south link from the station - were in conflict. An update to the policy could make clear how these instances should be dealt with.

Other changes in circumstances

- 3.674 There have been no other changes in circumstances that would affect this policy.

Conclusion

- 3.675 Policy CR2 should be subject to update due to:
- National planning policy changes on urban design, including the introduction of design codes and the National Design Guide and National Model Design Code; and
 - The result of appeal decisions in terms of the grid layout and achieving potentially conflicting design objectives.

CR3: Public Realm in Central Reading

- 3.676 This policy aims to outline how proposals should contribute to improving the quality of the public realm in Central Reading. This includes providing additional policy on provision of new open space that is to be read in conjunction with policy EN8.

Legislative changes

- 3.677 There have been no legislative changes that affect this policy.

National policy changes

- 3.678 There have been significant changes to national policy relating to design, including the introduction of design codes and the publication of the National Design Guide and the National Model Design Code. These are examined in detail in relation to policy CC7. Public realm is an intrinsic part of the approach to urban design within those documents and would be essential to design codes. However, the principles of policy CR3 currently fit well with the National Design Guide and National Model Design Code, and there is not considered to be any need to update the policy as a result of this.

Other policy changes

- 3.679 The Reading Climate Emergency Strategy, published in 2020, identifies a number of actions across a number of partners to address the climate emergency. This includes an action (T4) to improve the pedestrian experience in Central Reading and local centres by providing better access to key destinations for walking, cycling and bus passengers and green up the local environment to encourage use and

enjoyment of local facilities. Policy CR3 is already in line with this action, but more detail is likely to be required through a Town Centre Public Realm Strategy SPD.

Monitoring data

- 3.680 There is no monitoring data associated with this policy.

Appeals

- 3.681 This policy was relevant to one appeal decision since the plan was adopted and this did not indicate any need to amend or update the policy.

Other changes in circumstances

- 3.682 There have been no other changes in circumstances that would affect this policy.

Conclusion

- 3.683 No changes have been identified that result in the need to update policy CR3.

CR4: Leisure, Culture and Tourism in Central Reading

- 3.684 This policy aims to support provision of further leisure, culture and tourism uses in Central Reading and to enhance the role of the River Thames in recreation and tourism.

Legislative changes

- 3.685 There have been no legislative changes that affect this policy.

National policy changes

- 3.686 There have been no national policy changes that affect the need to update this policy.

Other policy changes

- 3.687 There have been no other policy changes that affect this policy.

Monitoring data

- 3.688 Between 1st April 2018 and 31st March 2022, there has been a very small net gain in leisure floorspace (defined as being within the former D2 assembly and leisure class or relevant sui generis uses such as cinemas and theatres) in central Reading of 196 sq m. At 31st March 2022, there was outstanding permission for a net gain of 7,105 sq m of leisure floorspace. These are not particularly significant changes in the context of the scale of the centre, and do not indicate a need to update the policy.

Appeals

- 3.689 This policy was relevant to one appeal decision since the plan was adopted and this did not indicate any need to amend or update the policy.

Other changes in circumstances

- 3.690 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.691 No changes have been identified that result in the need to update policy CR4.

CR5: Drinking Establishments in Central Reading

- 3.692 This policy aims to set out the approach to proposals involving pubs, bars and clubs in Central Reading.

Legislative changes

- 3.693 There have been no legislative changes that affect this policy.

National policy changes

- 3.694 There have been no national policy changes that affect the need to update this policy.

Other policy changes

- 3.695 The Council's most recent Licensing Policy covers the period from October 2018 to October 2023, and therefore came into effect after the Local Plan was submitted. The Licensing Policy incorporates the Cumulative Impact Assessment, which specifically deals with sale of alcohol within the Town Centre Cumulative Impact Area, which covers most of the commercial core of the town centre. The Cumulative Impact Assessment covers October 2018 to October 2021.
- 3.696 The general presumption is that applications for premises licence or club premises certificates would not be granted within the Town Centre Cumulative Impact Area where relevant representations are received, due to the high concentration of existing premises and associated crime and disorder, albeit that where an application is unlikely to have a negative effect on the promotion of the licensing objectives may be granted. The broad approach is similar to the previous approach at the time the Local Plan was prepared, and the extent of the Town Centre Cumulative Impact Area is unchanged, so this does not indicate a need to update the policy.
- 3.697 However, a review of the Cumulative Impact Assessment is already overdue as it must be reviewed every three years, and this is expected to take place during the Local Plan update process. This may lead to a need to update this policy.

Monitoring data

- 3.698 There is no monitoring data associated with this policy.

Appeals

- 3.699 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

3.700 There have been no other changes in circumstances that affect this policy.

Conclusion

3.701 Policy CR5 should be subject to update due to:

- The expectation that the Cumulative Impact Assessment may impact on the approach.

CR6: Living in Central Reading

3.702 This policy aims to deal with specific matters that affect residential proposals in the centre of Reading, including the mix of unit sizes, noise and air quality issues, specific requirements for affordable housing tenure and the issue of serviced apartments.

Legislative changes

3.703 There have been no legislative changes that affect this policy.

National policy changes

3.704 There has been an increasing emphasis in the NPPF on delivering homes at higher densities within locations which are particularly accessible by public transport. The most up-to-date NPPF highlights an expectation that there will be minimum densities for city and town centres and other locations that are well-served by public transport, and that these should seek a significant uplift in the average density of residential development. Although policy CR6 does not currently deal with density, an increase in town centre densities will bring additional considerations that may need to be reflected in an update to policy CR6.

Other policy changes

3.705 There have been no other policy changes that affect this policy.

Monitoring data

3.706 In terms of developments completed in the town centre in the period between submission of the plan in March 2018 and 31st March 2022, the size of dwellings delivered has been as follows:

- Studio/1-bed homes: net gain of 662 (60% of total)
- 2-bed homes: net gain of 409 (37% of total)
- 3-bed homes: net gain of 43 (4% of total)
- 4+-bed homes: net loss of 3 (N/A)

3.707 In terms of new permissions, a similar pattern can be seen, albeit slightly less dominated by 1-bed homes. The number of homes of each size newly permitted between 1st April 2018 and 31st March 2022 is as follows:

- Studio/1-bed homes: net gain of 1,823 (54% of total)

- 2-bed homes: net gain of 1,422 (42% of total)
- 3-bed homes: net gain of 133 (4% of total)
- 4+-bed homes: net loss of 3 (N/A)

3.708 In general, therefore, the delivery of larger 3-bed homes has not been too far away from the policy targets in CR6. However, there are significantly higher levels of 1-bed accommodation being delivered compared to the CR6 policy targets. Much of this may be down to residential prior approvals which are not required to comply with those targets and tend to be dominated by studio or 1-bed dwellings. The Article 4 direction now in place may mean that the delivery profile of town centre accommodation may be brought more into line with what is sought by CR6.

3.709 However, monitoring data set out in relation to policy H2 demonstrates the degree to which the delivery of housing across the Borough has failed to reflect the needs for larger dwellings of 3 or more bedrooms. Addressing this issue, in line with new needs identified by new evidence to be prepared, could well influence the mix to be delivered in the centre.

Appeals

3.710 This policy was relevant to one appeal decision since the plan was adopted and this did not indicate any need to amend or update the policy.

Other changes in circumstances

3.711 There have been no other changes in circumstances that affect this policy.

Conclusion

3.712 Policy CR6 should be subject to update due to:

- Changing national policy around residential densities in city and town centres; and
- The need to reconsider housing mix policies in the context of under-delivery of family housing.

CR7: Primary Frontages in Central Reading

3.713 This policy aims to ensure that the main shopping frontages across Central Reading provide active uses with a shopfront, and that a proportion of retail or financial and professional use is retained within each frontage.

Legislative changes

3.714 On 1st September 2020, changes to the Use Classes Order came into force that were particularly relevant to town centre uses, in particular the establishment of a new use class E (commercial, business and service). This is explored fully in relation to policy RL3 (see paragraphs 3.572 to 3.573), and the implications for CR7 of the removal of the A1 and A2 use classes and replacement by a wider E use class will be similar to RL3. An update is therefore required.

- 3.715 In addition, many of the uses covered by this policy will be impacted by the introduction of permitted development rights to convert E class uses to residential on 1st August 2021. These implications are again described in relation to policy RL3 in paragraphs 3.574 to 3.575. However, the Article 4 direction referred to in paragraph 3.576 also covers the entirety of the town centre, meaning that unless the Secretary of State exercises his powers of modification or cancellation these permitted development rights do not affect the policy.

National policy changes

- 3.716 National policy in the NPPF no longer requires a clear definition of primary and secondary frontages in designated centres. The policy defines only primary frontages, and the purpose for their definition is wider than simply complying with national policy, so this change does not in itself necessitate an update to the policy.

Other policy changes

- 3.717 There have been no other policy changes that affect this policy.

Monitoring data

- 3.718 There is no monitoring data associated with this policy.

Appeals

- 3.719 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.720 There have been no other changes in circumstances that would affect this policy.

Conclusion

- 3.721 Policy CR7 should be subject to update due to:
- Changes to the use classes order that affect the deliverability of parts of the policy.

CR8: Small Shop Units in Central Reading

- 3.722 This policy aims to retain the character of the small shop units in the areas of Central Reading characterised by such units, and to ensure that major new development makes provision for small shop units.

Legislative changes

- 3.723 There have been no legislative changes that affect this policy.

National policy changes

- 3.724 There have been no national policy changes that affect this policy.

Other policy changes

- 3.725 There have been no other policy changes that affect this policy.

Monitoring data

- 3.726 There is no monitoring data associated with this policy.

Appeals

- 3.727 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.728 There have been no other changes in circumstances that would affect this policy.

Conclusion

- 3.729 No changes have been identified that result in the need to update policy CR8.

CR9: Terraced Housing in Central Reading

- 3.730 This policy aims to retain the small pockets of terraced housing that continue to exist within the centre of Reading.

Legislative changes

- 3.731 There have been no legislative changes that affect this policy.

National policy changes

- 3.732 There have been no national policy changes that affect this policy.

Other policy changes

- 3.733 There have been no other policy changes that affect this policy.

Monitoring data

- 3.734 There is no monitoring data associated with this policy.

Appeals

- 3.735 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.736 There have been no significant changes to the identified small areas of terraced housing since the policy was drafted and adopted.

Conclusion

- 3.737 No changes have been identified that result in the need to update policy CR9.

CR10: Tall Buildings

- 3.738 This policy aims to set out comprehensive approach to tall buildings in Reading. It identifies three clusters where tall buildings may be appropriate, and outside of which tall buildings will not be appropriate. More guidance is given on the approach within each individual cluster. General criteria are set out for consideration of any tall building.

Legislative changes

- 3.739 There have been no legislative changes that affect this policy.

National policy changes

- 3.740 As set out in relation to other policies in this review, there is an increasing emphasis on increasing densities within town and city centres, and this is likely to continue to be the case with proposed changes to the NPPF that retain the 35% urban uplift. However, increasing densities does not necessarily mean requiring additional tall buildings, which are only one way of delivering high density, and the existing tall buildings policy was based on a townscape-led approach rather than attempting to deliver a certain level of development. It is not therefore clear that this requires a review of policy CR10.

Other policy changes

- 3.741 There have been no other policy changes that affect this policy.

Monitoring data

- 3.742 There is no monitoring data associated with this policy.

Appeals

- 3.743 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.744 The Local Plan was supported by a Tall Buildings Strategy Update Note (2018) which, among other matters, identified permissions and completions for tall buildings since the original Tall Buildings Strategy was prepared. Of those that were still outstanding at the time of the note, the following represents the updated position at March 2023:
- Kings Point - a 17-storey residential building, known as Verto, was completed in 2019;
 - Station Hill - revised permissions for the whole site were issued in 2021, but the development still represents a cluster of tall buildings. The initial phases south of Garrard Street (plots E and F, which do not contain tall buildings as defined in the Local Plan) are under construction;
 - Thames Quarter - a 23-storey residential building was completed in 2021;

- Royal Mail Sorting Office, 80 Caversham Road - an outline application (182252) for buildings of between 2-24 storeys has a resolution to grant permission subject to a Section 106 agreement.

- 3.745 In addition, a new permission was granted at Broad Street Mall (182137) was granted permission in December 2021 that would result in three tall buildings on the Broad Street Mall building, with the tallest being of 20 storeys.
- 3.746 All of the above are within the identified tall building clusters in the Local Plan. There have been no permissions for tall buildings as defined in the Local Plan outside those clusters.

Conclusion

- 3.747 No changes have been identified that result in the need to update policy CR10.

CR11: Station/River Major Opportunity Area

- 3.748 This policy aims to set out policy for the Station/River Major Opportunity Area, a large area of redevelopment potential centred around Reading Station, and extending to the River Thames in the north and Friar Street in the south, including more specific guidance on the individual sub-areas. The sites cover 17.09 ha total area and would provide 2,245-3,415 dwellings and 136,000-190,000 sq m of commercial floorspace.

Legislative changes

- 3.749 In 2020, there were amendments to the Use Classes Order which resulted in particular in a new use class E, which covered a number of uses such as offices and retail that were previously separate. Therefore, where retail, leisure and/or office development is specified in the various sub-area policies, in practice the decision-maker may have less control than when the plan was adopted.

National policy changes

- 3.750 The national policy changes that most clearly affect this policy are those which have placed greater emphasis on achieving high densities in city and town centres, which are discussed elsewhere. However, on large sites of this importance there are likely to be a number of aspects of changing national policy that need to be considered in any update.

Other policy changes

- 3.751 There have been no other policy changes that affect this policy.

Monitoring data

- 3.752 On the sites allocated under policy CR11, the amount of development delivered and committed is as follows:
- 315 dwellings were completed up to 31st March 2022;
 - 613 dwellings and 1,484 sq m of commercial space were under construction at 31st March 2022; and

- Up to 1,002 dwellings and 186,872 sq m of commercial space had permission but were not yet started at 31st March 2022.

3.753 Therefore, in general terms, progress on achieving the level of development outlined in the policy has been good and the policy does not require revision for this reason. Changes in circumstances on specific sites are considered below.

Appeals

3.754 This policy was relevant to one appeal decision since the plan was adopted, but this appeal explored much of the policy in some depth, and there are elements of the decision that point towards a need for an update.

3.755 Firstly, the issue of the north-south link is of great importance, and the appeal decision highlighted that the policy wording itself does not specifically require visual links between the station and Thames, and does not make clear which specific feature those visual links should be of. The other issue was the degree to which policy required this link to be direct, and whether ‘direct’ meant that it should be straight. An update should resolve this.

3.756 The other issue was that of comprehensiveness and the degree to which sites can be subdivided. In this case, the Inspector accepted the subdivision of the site was necessary, and, although agreeing with the Council’s argument on the need for a comprehensive development, considered that this issue was overcome in the planning balance. This can also be considered through an update, which could provide further guidance on whether or not there is the potential for subdivision of sites.

Other changes in circumstances

3.757 There have been changes in circumstances on a number of the sites identified in the policy since the plan was drafted.

3.758 Development has completed or is underway on the following sites that is broadly in compliance with the allocation:

- CR11a - Friar Street and Station Road - conversion and extension of 1 Station Road for 14 dwellings under construction;
- CR11c - Station Hill and Friars Walk - development for a total of 599 dwellings plus ground floor commercial uses on the southern part of the site along Friar Street under construction; and
- CR11h - Napier Road Junction - development for 315 dwellings completed in 20201-22.

3.759 Planning permissions have been granted on the following sites, but not yet commenced. It is considered that allocations should not necessarily be removed where permissions have been granted in case alternative applications are made. There may be a need to amend the allocation to reflect what has been permitted, although in the case of prior approvals for a form of use that would be affected by the Article 4 direction the implications of this will need to be carefully considered:

- CR11a - Friar Street and Station Road - redevelopment of 29 Station Road for hotel, offices and retail;
- CR11b - Greyfriars Road Corner - prior approval for conversion of 20 Greyfriars Road to 43 dwellings;
- CR11c - Station Hill and Friars Walk - redevelopment of Station Hill North site for mixed use development with offices, commercial, up to 750 dwellings and other uses;
- CR11e - North of Station - redevelopment of 80 Caversham Road for 620 dwellings, offices, retail, community uses and health centre (resolved to grant permission subject to Section 106 agreement);
- CR11f - West of Caversham Road - redevelopment of 97-117 Caversham Road for 60 dwellings (resolved to grant permission subject to Section 106 agreement);
- CR11g - Riverside - redevelopment of 55 Vastern Road part of site for 209 dwellings and café.

Conclusion

3.760 Policy CR11 should be subject to update due to:

- Changes to the circumstances on individual sites, including the progress of development;
- Potential impacts of changing national policy, including on matters such as increasing densities in town centres; and
- An appeal decision that highlighted the need for updates regarding the north-south link and the issue of comprehensiveness.

CR12: West Side Major Opportunity Area

3.761 This policy aims to set out policy for the West Side Opportunity Area, a large area of redevelopment potential around the western parts of the centre, extending to the railway line in the north and Castle Street in the south, including more specific guidance on the individual sub-areas. The sites cover 12.79 ha total area, and would provide 1,570-2,430 dwellings and 14,000-21,000 sq m of commercial floorspace.

Legislative changes

3.762 In 2020, there were amendments to the Use Classes Order which resulted in particular in a new use class E, which covered a number of uses such as offices and retail that were previously separate. Therefore, where retail and leisure development is specified in CR12a, CR12d and CR12e, in practice the decision-maker may have less control than when the plan was adopted.

National policy changes

3.763 The national policy changes that most clearly affect this policy are those which have placed greater emphasis on achieving high densities in city and town centres,

which are discussed elsewhere. However, on large sites of this importance there are likely to be a number of aspects of changing national policy that need to be considered in any update.

Other policy changes

- 3.764 Reading's new Corporate Plan 2022-25 refers to the importance of the plans for the Minster Quarter, made up of sites allocated in this policy, for achieving the 'thriving communities' theme. This would create a major new residential led mixed-use urban and cultural quarter in the heart of Reading. The policy will require updating to ensure that high-quality, deliverable proposals on this site can be achieved.

Monitoring data

- 3.765 On the sites allocated under policy CR12, the amount of development delivered and committed is as follows:
- 16 dwellings were completed up to 31st March 2022;
 - 269 dwellings were under construction at 31st March 2022; and
 - 775 dwellings and 5,171 sq m of commercial floorspace had permission but were not yet started at 31st March 2022.
- 3.766 Therefore, in general terms, although actual completions so far have been low, progress on achieving the level of development outlined in the policy has been reasonable and the policy does not require revision for this reason. Changes in circumstances on specific sites are considered below.

Appeals

- 3.767 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.768 There have been changes in circumstances on a number of the sites identified in the policy since the plan was drafted. Development has completed or is underway on the following sites that is broadly in compliance with the allocation:
- CR12b - Great Knollys Street and Weldale Street - development for 422 dwellings at Weldale Street and 40 dwellings at 45 Caversham Road both under construction; and
 - CR12c - Chatham Street, Eaton Place and Oxford Road - development for 16 dwellings at 114 Oxford Road completed in 2021-22.
- 3.769 Planning permissions have been granted on the following sites, but not yet commenced. It is considered that allocations should not necessarily be removed where permissions have been granted in case alternative applications are made. There may be a need to amend the allocation to reflect what has been permitted, although in the case of prior approvals for a form of use that would be affected by the Article 4 direction the implications of this will need to be carefully considered:

- CR12b - Great Knollys Street and Weldale Street - development for 10 dwellings and office space at Unit 16, North Street (resolved to grant permission subject to Section 106 agreement);
- CR12c - Chatham Street, Eaton Place and Oxford Road - prior approval for conversion of Eaton Court to 58 dwellings and redevelopment of 115 Chatham Street to 54 dwellings;
- CR12d - Broad Street Mall - development for 422 dwellings above the Broad Street Mall, hotel at 20 Hosier Street and prior approval for conversion of Fountain House to 48 dwellings.

3.770 In January 2023, Reading Borough Council was awarded £19.1 million of Levelling-Up funds for two projects, one of which was the addition of a new space at the Hexagon for performances and community uses and new access. The implications for the policy will need to be considered as part of the update.

Conclusion

3.771 Policy CR12 should be subject to update due to:

- Changes to the circumstances on individual sites, including the progress of development and the award of funds for the Hexagon; and
- Potential impacts of changing national policy, including on matters such as increasing densities in town centres.

CR13: East Side Major Opportunity Area

3.772 This policy aims to set out policy for the East Side Opportunity Area, a large area of redevelopment potential around the eastern parts of the centre, extending from close to Reading Station in the west to the mouth of the River Kennet in the east, including more specific guidance on the individual sub-areas. The sites cover 11.21 ha total area and would provide 1,531-2,285 dwellings.

Legislative changes

3.773 There have been no legislative changes that affect this policy.

National policy changes

3.774 The national policy changes that most clearly affect this policy are those which have placed greater emphasis on achieving high densities in city and town centres, which are discussed elsewhere. However, on large sites of this importance there are likely to be a number of aspects of changing national policy that need to be considered in any update.

Other policy changes

3.775 The Council's new Corporate Plan 2022-25 highlights the importance of Reading Prison in enhancing the town's cultural offer which in turn contributes to the 'inclusive economy' theme. There have been ongoing discussions regarding the prison site, and there is expected to be a need to update this part of the site allocation to ensure that the cultural offer can be secured.

Monitoring data

- 3.776 On the sites allocated under policy CR13, the amount of development delivered and committed is as follows:
- 169 dwellings were completed up to 31st March 2022;
 - 596 dwellings and 1,386 sq m of commercial space were under construction at 31st March 2022; and
 - 130 dwellings had permission but were not yet started at 31st March 2022.
- 3.777 Therefore, in general terms, progress on achieving the level of development outlined in the policy has been good and the policy does not require revision for this reason. Changes in circumstances on specific sites are considered below.

Appeals

- 3.778 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.779 There have been changes in circumstances on a number of the sites identified in the policy since the plan was drafted.
- 3.780 Development has completed or is underway on the following sites that is broadly in compliance with the allocation:
- CR13b - Forbury Retail Park - development of land at Kenavon Drive (former Homebase and Toys R Us) for 769 dwellings under construction with 169 dwellings completed up to the end of 2021-22.
- 3.781 Planning permissions have been granted on the following sites, but not yet commenced. It is considered that allocations should not necessarily be removed where permissions have been granted in case alternative applications are made. There may be a need to amend the allocation to reflect what has been permitted, although in the case of prior approvals for a form of use that would be affected by the Article 4 direction the implications of this will need to be carefully considered:
- CR13d - Gas Holder - redevelopment for 130 dwellings.

Conclusion

- 3.782 Policy CR13 should be subject to update due to:
- Changes to the circumstances on individual sites, including the progress of development; and
 - Potential impacts of changing national policy, including on matters such as increasing densities in town centres.

CR14: Other Sites for Development in Central Reading

- 3.783 This policy identifies a number of sites for development outside the three major opportunity areas. The sites cover 4.31 ha total area, and would provide 290-452 dwellings and 2,500-3,100 sq m of commercial floorspace.

Legislative changes

- 3.784 In 2020, there were amendments to the Use Classes Order which resulted in particular in a new use class E, which covered a number of uses such as offices and retail that were previously separate. Therefore, where retail development is specified in CR14g and leisure use in CR14m, in practice the decision-maker may have less control than when the plan was adopted.

National policy changes

- 3.785 The national policy changes that most clearly affect this policy are those which have placed greater emphasis on achieving high densities in city and town centres, which are discussed elsewhere, and which should be considered as part of any update.

Other policy changes

- 3.786 The Reading Climate Emergency Strategy, published in 2020, identifies a number of actions across a number of partners to address the climate emergency. This includes an action (E18) to bring forward hydro-electric power schemes powered by Reading's rivers. Allocation CR14m is in line with this action.

Monitoring data

- 3.787 On the sites allocated under policy CR14, the amount of development delivered and committed is as follows:
- 89 dwellings were completed up to 31st March 2022;
 - 41 dwellings were under construction at 31st March 2022; and
 - 93 dwellings had permission but were not yet started at 31st March 2022.
- 3.788 Therefore, in general terms, progress on achieving the level of development outlined in the policy has been good and the policy does not require revision for this reason. Changes in circumstances on specific sites are considered below.

Appeals

- 3.789 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.790 There have been changes in circumstances on a number of the sites identified in the policy since the plan was drafted.
- 3.791 Development has completed or is underway on the following sites that is broadly in compliance with the allocation, and the allocations can therefore be removed:
- CR14b - Former Reading Family Centre, North Street - development for 41 dwellings under construction;
 - CR14k - Corner of Crown Street and Silver Street - development for 89 dwellings completed 2021;

- CR14m - Caversham Lock Island and Caversham Weir, Thames Side - provision of hydropower at Caversham Weir was completed in 2021.
- 3.792 Development has completed or is underway on the following sites that significantly differs from the allocation, meaning that the allocation is no longer deliverable and can be removed:
- CR14c - 17-23 Queen Victoria Street - change of use for serviced apartments completed 2021;
 - CR14f - 1-5 King Street - change of use to offices and restaurant completed 2020.
- 3.793 Planning permissions have been granted on the following sites, but not yet commenced. It is considered that allocations should not necessarily be removed where permissions have been granted in case alternative applications are made. There may be a need to amend the allocation to reflect what has been permitted, although in the case of prior approvals for a form of use that would be affected by the Article 4 direction the implications of this will need to be carefully considered:
- CR14d - 173-175 Friar Street and 27-32 Market Place - two prior approvals have been granted for conversion of offices to a total of 26 dwellings. There have been previous consents on the site that are now expired or superseded;
 - CR14e - 3-10 Market Place, Abbey Hall and Abbey Square - prior approval has been granted for conversion of offices to 144 dwellings.
- 3.794 In addition, it is likely that landowner intentions have changed regarding CR14g, the Oracle extension, as evidenced by recent applications for the centre, and is no longer expected to entail a retail extension in this location. This allocation is therefore unlikely to be deliverable and requires review.
- 3.795 The list of planning permissions in paragraph 5.4.39 will need to be updated.
- 3.796 In terms of the wider picture, changes to the number of homes that Reading needs to accommodate may mean that additional sites in Central Reading and outside the Major Opportunity Areas need to be identified, which would be added to this policy. It may also mean the need to revise the dwelling totals on existing sites.

Conclusion

- 3.797 Policy CR14 should be subject to update due to:
- The need to remove sites where development has completed or is underway;
 - The need to amend site allocations in line with what has been permitted on site;
 - The need to amend site allocations to ensure that they are deliverable; and
 - The potential need to identify further sites or amend allocations to help to meet housing needs.

CR15: The Reading Abbey Quarter

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

Legislative changes

- 3.799 There have been no legislative changes that affect this policy.

National policy changes

- 3.800 There have been no national policy changes that affect this policy.

Other policy changes

- 3.801 There have been no other policy changes that affect this policy.

Monitoring data

- 3.802 There is no monitoring data associated with this policy.

Appeals

- 3.803 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.804 The Reading Abbey ruins remain on the Heritage at Risk Register. Although repairs have been carried out to most of the ruins including the gatehouse, refectory wall and elements within the ownership of St James's church, the outstanding element is the mill arch in private ownership where repointing, repair and long-term management is required.
- 3.805 The situation with the Reading Prison site, which is on the edge of the Reading Abbey Quarter area, has evolved since the Local Plan was produced. The site has been advertised for sale, and proposals have been put forward for the use of the site for cultural facilities that complement the Reading Abbey Quarter area. The future of this site should be considered alongside the Reading Abbey Quarter and may require updates to this policy.

Conclusion

- 3.806 Policy CR15 should be subject to update due to:
- The need to include the provision of cultural facilities on the Reading Prison site and how this interacts with the Reading Abbey Quarter.

CR16: Areas to the North of Friar Street and East of Station Road

- 3.807 This policy aims to set policy guidance should development proposals come forward in the area north east of the junction of Friar Street and Station Road.

Legislative changes

- 3.808 There have been no legislative changes that affect this policy.

National policy changes

- 3.809 There have been no national policy changes that affect this policy.

Other policy changes

- 3.810 There have been no other policy changes that affect this policy.

Monitoring data

- 3.811 There is no monitoring data associated with this policy.

Appeals

- 3.812 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.813 An amendment was made to the listing of 15 Friar Street on 15th December 2021 to clarify that the listing included Numbers 1 to 26 Harris Arcade. Similarly, an amendment was made on the same date to the listing of 8-10 Station Road to clarify that the listing included Numbers 2-25 Harris Arcade. Whilst this may require a short updated reference in the supporting text, it is not considered that this represents a reason to update the policy.

Conclusion

- 3.814 No changes have been identified that result in the need to update policy CR16.

SR1: Island Road Major Opportunity Area

- 3.815 This policy aims to set out policy for the Island Road Opportunity Area, a large area of development potential around Island Road and to the west of the A33, including more specific guidance on the individual sub-areas. The sites cover 45 ha total area and would provide 129,800-157,000 sq m of employment floorspace.

Legislative changes

- 3.816 As detailed in paragraphs 3.622 to 3.623, the REPIR 2019 legislation has resulted in the extension of the Detailed Emergency Planning Zone (DEPZ) around AWE Burghfield in 2020. This now covers the whole of the SR1 area, and it would mean that proposals for development in accordance with the policy would need to be considered in terms of whether they can be accommodated within the Off-Site Emergency Plan. At the very least this would need to be reflected in the criteria of the policy, but it will also require consideration of whether the proposal as set out in the Local Plan is deliverable. As such, the policy requires review.

National policy changes

- 3.817 As set out in relation to policy EM1, national policy now identifies the importance of planning for storage and distribution uses. This is the main allocation that the Local Plan makes for industrial and warehouse uses, but the national policy change merely underlines its importance.

Other policy changes

- 3.818 There have been no other policy changes that affect this policy.

Monitoring data

- 3.819 On the sites allocated under policy SR1, the amount of development delivered and committed is as follows:
- 11,067 sq m of employment space was completed up to 31st March 2022.
- 3.820 Other than for one now completed site, progress on achieving the level of development outlined in the policy has been slow so far, perhaps reflecting the presence of large sites that are complicated to bring forward. Changes in circumstances on specific sites are considered below.

Appeals

- 3.821 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.822 There have been changes in circumstances on one site identified in the policy since the plan was drafted.
- 3.823 Development has completed or is underway on the following site that is broadly in compliance with the allocation, and the allocation can therefore be removed:
- SR1b - North of Island Road - development for 11,067 sq m of industrial and warehouse space, completed in 2019.

Conclusion

- 3.824 Policy SR1 should be subject to update due to:
- Changes to the circumstances on individual sites, including the progress of development; and
 - The potential need to amend allocations to help to meet employment needs.

SR2: Land North of Manor Farm Road Major Opportunity Area

- 3.825 This policy aims to set out policy for the Land North of Manor Farm Road Major Opportunity Area, an area currently in employment and commercial use north of Manor Farm Road and west of Basingstoke Road. The area covers 13.69 ha, and would provide 680-1,020 dwellings.

Legislative changes

- 3.826 There have been no legislative changes that affect this policy.

National policy changes

- 3.827 There have been no national policy changes that affect this policy.

Other policy changes

- 3.828 The Central and Eastern Berkshire Joint Minerals and Waste Plan (CEBJMWP) was adopted in January 2023, and sets out policy for considering minerals and waste development proposals. Policy W4 identifies a number of Preferred Waste Areas, which are the locations where waste management capacity should be delivered in the first instance (alongside specifically allocated sites). These Preferred Waste Areas include the Land North of Manor Farm Road Major Opportunity Area. The area is identified as being potentially suitable for Category 3 activities (activities requiring enclosed industrial premises (small scale)). However, these activities are typically industrial uses of a type for which the Local Plan already considers the employment areas to be suitable, and provision of these activities is likely to count towards meeting employment needs in any case. For this reason, there is no need to update the policy to account for the CEBJMWP.

Monitoring data

- 3.829 There has been no progress to report from monitoring data on the site. This site remains one that is more likely to come forward over the longer term.

Appeals

- 3.830 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.831 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.832 No changes have been identified that result in the need to update policy SR2.

SR3: South of Elgar Road Major Opportunity Area

- 3.833 This policy aims to set out policy for the South of Elgar Road Major Opportunity Area, an area currently in employment and commercial use south of Elgar Road. The area covers 5.38 ha, and would provide 330-500 dwellings.

Legislative changes

- 3.834 There have been no legislative changes that affect this policy.

National policy changes

- 3.835 There have been no national policy changes that affect this policy.

Other policy changes

- 3.836 There have been no other policy changes that affect this policy.

Monitoring data

- 3.837 There has been no progress to report from monitoring data on the site. This site remains one which is more likely to come forward over the longer term.

Appeals

- 3.838 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.839 There have been no other changes in circumstances that affect this policy.

Conclusion

- 3.840 No changes have been identified that result in the need to update policy SR3.

SR4: Other Sites for Development in South Reading

- 3.841 This policy identifies a number of sites for development outside the three major opportunity areas in South Reading. The sites cover 10.84 ha total area and would provide 138-207 dwellings and 13,200-15,700 sq m of employment floorspace.

Legislative changes

- 3.842 The changes to the REPPIR legislation (see the changes affecting policy OU2 detailed in paragraphs 3.622 to 3.623) which resulted in the extension of the Detailed Emergency Planning Zone around AWE Burghfield resulted in the proposal for the development of the Grazeley garden settlement being abandoned, and the proposal no longer appears in the latest versions of the local plans of either Wokingham Borough Council or West Berkshire District Council. As a result, allocation SR4f (Land South West of Junction 11 of the M4), which was only capable of development as part of the wider Grazeley proposal, is no longer deliverable and the policy should be amended to remove it.

National policy changes

- 3.843 There have been no national policy changes that affect this policy.

Other policy changes

- 3.844 The Wokingham Local Plan Update went through consultation on a full draft between February and April 2020, and there was a subsequent consultation on a Revised Growth Strategy. The Revised Growth Strategy moved away from the Grazeley Garden Settlement proposal, of which allocation SR4f forms part, and instead proposes alternative Strategic Development Locations at Hall Farm/Loddon Valley and an extension to South Wokingham. The West Berkshire Local Plan Proposed Submission published in January 2023 also does not identify any this

development. SR4f therefore no longer accords with adjacent proposals. These alternative locations do not require any land in Reading.

Monitoring data

- 3.845 On the sites allocated under policy SR4, the amount of development delivered and committed is as follows:
- 15,080 sq m of employment space has planning permission but was not started at 31st March 2022.
- 3.846 Progress on achieving the level of development outlined in the policy has been slow so far, but many of these sites were expected to be somewhat longer-term in nature. Changes in circumstances on specific sites are considered below.

Appeals

- 3.847 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.848 There have been changes in circumstances on one site identified in the policy since the plan was drafted.
- 3.849 Planning permission has been granted on the following site, but not yet commenced. It is considered that allocations should not necessarily be removed where permissions have been granted in case alternative applications are made:
- SR4e - Part of former Berkshire Brewery site - planning permission has been granted for an employment development of the whole site for industrial and warehouses uses.
- 3.850 The list of planning permissions in paragraph 6.3.18 will need to be updated.
- 3.851 In terms of the wider picture, changes to the number of homes that Reading needs to accommodate may mean that additional sites in South Reading and outside the Major Opportunity Areas need to be identified, which would be added to this policy. It may also mean the need to revise the dwelling totals on existing sites.

Conclusion

- 3.852 Policy SR4 should be subject to update due to:
- The need to amend site allocations in line with what has been permitted on site;
 - The need to remove site allocations that are no longer deliverable; and
 - The potential need to identify further sites or amend allocations to help to meet housing needs.

SR5: Leisure and Recreation Use of the Kennetside Areas

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

Legislative changes

- 3.854 There have been no legislative changes that affect this policy.

National policy changes

- 3.855 There have been no national policy changes that affect this policy.

Other policy changes

- 3.856 The Reading Climate Emergency Strategy, published in 2020, identifies a number of actions across a number of partners to address the climate emergency. This includes an action (W14) to improve the resilience of the Kennet Meadows through creating a resilient wetland. This may have implications for policy SR5, and may also need some other amendments to the plan to ensure that such a proposal is supported by local policy should any planning permission be required.
- 3.857 This proposal is further reflected in the Biodiversity Action Plan, published in 2021, which includes an aim to “*maximise the wildlife value of the Kennet Valley East BOA*”, which involves a specific action to “*raise the water levels in Fobney Meadow*”. Again, the implications of such a proposal for policy SR5 will need to be considered.

Monitoring data

- 3.858 There is no monitoring data associated with this policy.

Appeals

- 3.859 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.860 There are no other changes in circumstances that affect this policy.

Conclusion

- 3.861 Policy SR5 should be subject to update due to:
- Potential implications of proposals to create further wetland at Kennet Meadows on any other Kennetside proposals.

WR1: Dee Park

- 3.862 This policy aims to continue the regeneration of the Dee Park area to provide a sustainable community including additional housing, local centre, community facilities and improved open space.

Legislative changes

- 3.863 There have been no legislative changes that affect this policy.

National policy changes

- 3.864 There have been no national policy changes that affect this policy.

Other policy changes

- 3.865 There have been no other policy changes that affect this policy.

Monitoring data

- 3.866 There has been no progress to report from monitoring data on the site. There is outline planning permission under Phase 3 of the Dee Park development for a net gain of 108 dwellings, but this pre-dates the Local Plan.

Appeals

- 3.867 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.868 There is a planning application under consideration for the redevelopment of Ranikhet Primary School, within the site area, for a new two-form entry primary school. Whilst this application will be considered on its merits, enhancing the role of Ranikhet Primary School in serving the community is part of the policy.

Conclusion

- 3.869 No changes have been identified that result in the need to update policy WR1.

WR2: Park Lane Primary School, The Laurels and Downing Road

- 3.870 This policy aims to provide for the consolidation of the Park Lane Primary School facilities onto a single site allowing for the use of some existing land for residential purposes (60-75 dwellings).

Legislative changes

- 3.871 There have been no legislative changes that affect this policy.

National policy changes

- 3.872 There have been no national policy changes that affect this policy.

Other policy changes

- 3.873 The Council's Playing Pitches Strategy, adopted in November 2021, contains specific recommendations for the Downing Road Playing Field site. It notes that the site is included as a development allocation in the Local Plan, and that there is no current demand for sports facility provision here, but recommends that this area of open space should be protected for informal sporting and recreational use. The

policy currently does this, unless it can be demonstrated that it is no longer required.

Monitoring data

- 3.874 There has been no progress to report from monitoring data on the site.

Appeals

- 3.875 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.876 There have been no other changes in circumstances relating to this policy.

Conclusion

- 3.877 No changes have been identified that result in the need to update policy WR2.

WR3: Other Sites for Development in West Reading and Tilehurst

- 3.878 This policy identifies a number of sites for development within West Reading and Tilehurst in addition to those covered by WR1 and WR2. The sites cover 18.07 ha total area, and would provide 558-849 dwellings and 3,700-4,600 sq m of commercial floorspace.

Legislative changes

- 3.879 In 2020, there were amendments to the Use Classes Order which resulted in particular in a new use class E, which covered a number of uses such as offices and retail that were previously separate. Therefore, where retail and leisure development is specified in WR3o, in practice the decision-maker may have less control than when the plan was adopted.

National policy changes

- 3.880 There have been no national policy changes that affect this policy.

Other policy changes

- 3.881 There have been no other policy changes that affect this policy.

Monitoring data

- 3.882 On the sites allocated under policy WR3, the amount of development delivered and committed is as follows:
- 250 dwellings were completed up to 31st March 2022;
 - 88 dwellings and 6,050 sq m of commercial floorspace were under construction at 31st March 2022; and
 - 26 dwellings had permission but were not yet started at 31st March 2022.

- 3.883 Therefore, in general terms, progress on achieving the level of development outlined in the policy has been good and the policy does not require revision for this reason. Changes in circumstances on specific sites are considered below.

Appeals

- 3.884 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.885 There have been changes in circumstances on a number of the sites identified in the policy since the plan was drafted.
- 3.886 Development has completed or is underway on the following sites that is broadly in compliance with the allocation, and the allocations can therefore be removed:
- WR3a - Former Cox and Wyman site, Cardiff Road - development for 96 dwellings, 33 completed at the end of 2021-22 and remainder under construction;
 - WR3d - Rivermead Leisure Centre, Richfield Avenue - development for new leisure centre including swimming pool under construction;
 - WR3g - 211-221 Oxford Road, 10 and rear of 8 Prospect Street - a number of separate developments have completed at 10 and rear of 8 Prospect Street that delivered 13 dwellings in total between 2016 and 2022. The Oxford Road part of the site remains unimplemented, although an update should consider its deliverability;
 - WR3i - Part of Former Battle Hospital, Portman Road - development of almost all of the site for 211 dwellings was expected to be fully completed in 2023. Only a small part of the site outside the permission remains undeveloped, and an update can consider whether this should be identified as an allocation in itself;
 - WR3q - Norcot Community Centre, Lyndhurst Road - development for 18 dwellings and community use completed in 2023;
- 3.887 Development has completed or is underway on the following sites that significantly differs from the allocation, meaning that the allocation is no longer deliverable and can be removed:
- WR3c - 28-30 Richfield Avenue - refurbishment and extension of car showroom completed 2020.
- 3.888 Planning permissions have been granted on the following sites, but not yet commenced. It is considered that allocations should not necessarily be removed where permissions have been granted in case alternative applications are made. There may be a need to amend the allocation to reflect what has been permitted:
- WR3e - Yeomanry House, Castle Hill - use of the building for a nursery and offices (permitted subject to Section 106 agreement);

- WR3j - Land at Moultsford Mews - development for 26 dwellings and a commercial unit;
- WR3o - The Meadway Centre, Honey End Lane - partial redevelopment and refurbishment for retail and leisure uses and 258 dwellings (permitted subject to Section 106 agreement).

3.889 The list of planning permissions in paragraph 7.3.18 will need to be updated.

3.890 In terms of the wider picture, changes to the number of homes that Reading needs to accommodate may mean that additional sites in West Reading and Tilehurst need to be identified, which would be added to this policy. It may also mean the need to revise the dwelling totals on existing sites.

Conclusion

3.891 Policy WR3 should be subject to update due to:

- The need to remove sites where development has completed or is underway or where an alternative development has proceeded;
- The need to amend site allocations in line with what has been permitted on site; and
- The potential need to identify further sites or amend allocations to help to meet housing needs.

CA1: Sites for Development in Caversham and Emmer Green

3.892 This policy identifies a number of sites for development within Caversham and Emmer Green. The sites cover 7.82 ha total area, and would provide 164-241 dwellings.

Legislative changes

3.893 There have been no legislative changes that affect this policy.

National policy changes

3.894 There have been no national policy changes that affect this policy.

Other policy changes

3.895 The South Oxfordshire Local Plan 2011-2034 was adopted in December 2020. Although the remainder of the Reading Golf Club land within South Oxfordshire was nominated during the plan process, it was not included as a strategic allocation within the adopted document.

Monitoring data

3.896 On the sites allocated under policy CA1, the amount of development delivered and committed is as follows:

- 2 dwellings were completed up to 31st March 2022; and
- 224 dwellings had permission but were not yet started at 31st March 2022.

- 3.897 Therefore, in general terms, progress on achieving the level of development outlined in the policy has been good and the policy does not require revision for this reason. Changes in circumstances on specific sites are considered below.

Appeals

- 3.898 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.899 There have been changes in circumstances on a number of the sites identified in the policy since the plan was drafted.
- 3.900 Development has completed or is underway on the following site that is likely to mean an amendment to the boundary:
- CA1d - Rear of 200-214 Henley Road, 12-24 All Hallows Road & 4, 7 & 8 Copse Avenue - development for two dwellings at 4 Copse Avenue completed 2022, remainder of site remains outstanding.
- 3.901 Planning permissions have been granted on the following sites, but not yet commenced. It is considered that allocations should not necessarily be removed where permissions have been granted in case alternative applications are made. There may be a need to amend the allocation to reflect what has been permitted:
- CA1b - Part of Reading Golf Course, Kidmore End Road - development of wider Golf Club site within Reading Borough for up to 223 dwellings;
 - CA1e - Rear of 13-14a Hawthorne Road & 282-292 Henley Road - development of one dwelling to rear of 292 Henley Road. Remainder of site outstanding.
- 3.902 The list of planning permissions in paragraph 8.3.6 will need to be updated.
- 3.903 In terms of the wider picture, changes to the number of homes that Reading needs to accommodate may mean that additional sites in Caversham and Emmer Green need to be identified, which would be added to this policy. It may also mean the need to revise the dwelling totals on existing sites.

Conclusion

- 3.904 Policy CA1 should be subject to update due to:
- The need to amend site allocations in line with what has been permitted on site; and
 - The potential need to identify further sites or amend allocations to help to meet housing needs.

CA2: Caversham Park

- 3.905 This policy sets out policy to guide any development in Caversham Park, to take account of the particular constraints of the area including its heritage, landscape and biodiversity significance. It identifies potential for 40-45 dwellings resulting from conversion of Caversham Park House.

Legislative changes

- 3.906 There have been no legislative changes that affect this policy.

National policy changes

- 3.907 There have been no national policy changes that affect this policy.

Other policy changes

- 3.908 The Rights of Way Improvement Plan (ROWIP) was published for consultation in November 2022. Among the actions identified within the ROWIP is action 4.2, to *“identify footpaths as part of the Caversham Park site permissible to the public”*. This accords with the importance of achieving public access to the park as set out in policy CA2.

Monitoring data

- 3.909 There has been no progress to report from monitoring data on the site.

Appeals

- 3.910 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.911 A planning application reference 220409 for conversion of existing buildings including Caversham Park House to a care home and retirement dwellings as well as additional residential development and other changes was submitted in March 2022. The application is as yet undetermined and will need to be considered against policy CA2 as well as other policies in the plan. The submission of this application does not in itself render the policy out of date. This matter will need to be kept under review through the process depending on the outcome of the application process.

Conclusion

- 3.912 No changes have been identified that result in the need to update policy CA2.

ER1: Sites for Development in East Reading

- 3.913 This policy identifies a number of sites for development within East Reading. The sites cover 8.99 ha total area, and would provide 113-172 dwellings, 476-538 student bedspaces and 1,760-1,940 sq m of commercial floorspace.

Legislative changes

- 3.914 In 2020, there were amendments to the Use Classes Order which resulted in particular in a new use class E, which covered a number of uses such as offices and retail that were previously separate. Therefore, where retail and leisure is specified in the various allocations (e.g. ER1i and ER2k), in practice the decision-maker may have less control than when the plan was adopted.

National policy changes

3.915 There have been no national policy changes that affect this policy.

Other policy changes

3.916 There have been no other policy changes that affect this policy.

Monitoring data

3.917 On the sites allocated under policy ER1, the amount of development delivered and committed is as follows:

- 15 dwellings and 3,726 sq m of commercial floorspace were under construction at 31st March 2022; and
- 22 dwellings had permission but were not yet started at 31st March 2022.

3.918 Therefore, in general terms, progress on achieving the level of development outlined in the policy has been relatively limited. Changes in circumstances on specific sites are considered below.

Appeals

3.919 This policy was relevant to one appeal decision since the plan was adopted and this did not indicate any need to amend or update the policy.

Other changes in circumstances

3.920 There have been changes in circumstances on a number of the sites identified in the policy since the plan was drafted.

3.921 Development has completed or is underway on the following sites that is broadly in compliance with the allocation, and the allocations can therefore be removed:

- ER1h - Arthur Hill Swimming Pool, 221-225 Kings Road - conversion and development for 15 dwellings under construction;
- ER1j - Palmer Park Stadium Area - development for new leisure centre including swimming pool completed in 2023.

3.922 Development has completed or is underway on the following sites that significantly differs from the allocation, meaning that the allocation is no longer deliverable and can be removed:

- ER1f - Hamilton Centre, Bulmershe Road - extension and conversion for special educational needs college completed 2022.

3.923 Planning permissions have been granted on the following sites, but not yet commenced. It is considered that allocations should not necessarily be removed where permissions have been granted in case alternative applications are made. There may be a need to amend the allocation to reflect what has been permitted:

- ER1g - Alexander House, Kings Road - prior approval for conversion from offices to 22 dwellings. Permission for redevelopment for 56 dwellings (granted during Local Plan preparation process) has now expired.

- 3.924 The list of planning permissions in paragraph 9.3.6 will need to be updated.
- 3.925 In terms of the wider picture, changes to the number of homes that Reading needs to accommodate may mean that additional sites in East Reading need to be identified, which would be added to this policy. It may also mean the need to revise the dwelling totals on existing sites.

Conclusion

- 3.926 Policy ER1 should be subject to update due to:
- The need to remove sites where development has completed or is underway or where an alternative development has proceeded;
 - The need to amend site allocations in line with what has been permitted on site; and
 - The potential need to identify further sites or amend allocations to help to meet housing needs.

ER2: Whiteknights Campus, University of Reading

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

Legislative changes

- 3.928 On 21st April 2021, amendments to Part 7, class M of the GPDO came into force that significantly expand the ability for universities to expand without requiring planning permission. This is explored in full in relation to policy OU1, but it allows a cumulative development of the greater of 25% of the existing footprint or 250 sq m, subject to other restrictions. This means that there is potentially a significant amount of development that could occur on the campus without any need to apply for planning permission.

National policy changes

- 3.929 The main change in relation to this topic in the NPPF is that the most recent version now emphasises the need to ensure faster delivery of public service infrastructure including universities, there is a need for local authorities to work proactively with promoters, delivery partners and statutory bodies to plan for facilities before applications are submitted. This is something that will need to be undertaken more broadly as part of an update.

Other policy changes

- 3.930 The Wokingham Local Plan Update went through consultation on a full draft between February and April 2020. This contains policy ER10 on Whiteknights Campus. Much of the policy is virtually identical to Reading's own policy, but there are some important differences, in particular making specific reference to meeting the university's long-term needs as set out in documents such as the

Accommodation Strategy and Campus Capacity Study that were available at the Reading Borough Local Plan examination and which the Council raised concerns about at the time. In addition, the Wokingham policy did not include the provision that new development for academic facilities needs to be supported by adequate student accommodation. The Council made representations on this issue, and it is not yet clear what the final version of the Wokingham Local Plan will say. At this stage therefore this is not considered to represent a reason to update the Local Plan.

Monitoring data

- 3.931 There has been no net change in floorspace within the part of the campus within Reading Borough since the Local Plan was submitted.

Appeals

- 3.932 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.933 There have been no other changes in circumstances that affect this policy

Conclusion

- 3.934 Policy ER2 should be subject to update due to:
- Changes to permitted development rights that allow for considerable levels of development without requiring planning permission; and
 - The need to work proactively with the University on the latest position on the future of the campus.

ER3: Royal Berkshire Hospital

- 3.935 This policy sets out policy to guide any development at the Royal Berkshire Hospital, to take account of the particular constraints of the area including its heritage value, and to enable the hospital to continue to develop to fulfil its important role in the town.

Legislative changes

- 3.936 On 21st April 2021, amendments to Part 7, class M of the GPDO came into force that significantly expand the ability for hospitals to expand without requiring planning permission. This is explored in full in relation to policy OU1, but it allows a cumulative development of the greater of 25% of the existing footprint or 250 sq m, subject to other restrictions.
- 3.937 There may be some opportunities for this permitted development right to be exercised for this site, but these are likely to be limited by the fact that the site is already densely developed and much is within the curtilage of a listed building where the permitted development right would not apply. Significant development is therefore likely to continue to require planning permission. It is not therefore considered that this change necessitates an update of the policy.

National policy changes

- 3.938 The main change in relation to this topic in the NPPF is that the most recent version now emphasises the need to ensure faster delivery of public service infrastructure including hospitals, there is a need for local authorities to work proactively with promoters, delivery partners and statutory bodies to plan for facilities before applications are submitted. This is something that will need to be undertaken more broadly as part of an update.

Other policy changes

- 3.939 There have been no other policy changes that affect this policy.

Monitoring data

- 3.940 No changes to floorspace on site had been completed by 31st March 2022. A small addition of 328 sq m to enable the provision of two CT scanners (permission 211134) was underway.

Appeals

- 3.941 This policy has not been a factor in appeals determined since adoption of the Local Plan.

Other changes in circumstances

- 3.942 The future of the Royal Berkshire Hospital is under active consideration. In December 2020, a Strategic Outline Business Case was produced for consideration by the NHS, which set out three options:
- Development of emergency care block, elective centre for planned hospital care, new women's and children's facility and potential local Medical School;
 - Building of a substantially new hospital on the present site of the Royal Berkshire Hospital in Reading; and
 - Full relocation and rebuilding of a new hospital.
- 3.943 A consultation was undertaken by the Royal Berkshire NHS Foundation Trust between January and March 2023 on the future of the hospital. This consultation included whether or not the existing hospital should be changed, whether a new hospital should be built on the site or whether a new hospital should be developed elsewhere in Berkshire.
- 3.944 No site for a relocated hospital is suggested in the business case. Wokingham Borough Council's Revised Growth Strategy for its Local Plan Update has suggested that it could be part of a development at Hall Farm/Loddon Valley, on the edge of the Reading urban area, but this was for consultation at that stage. The Council's response to this consultation set out its opposition to the hospital moving out of Reading.
- 3.945 This is a developing matter, and there are likely to be further announcements during the process of updating policies. Whatever is decided, there will be likely

implications for the policy, which means that it should be part of the policies update.

Conclusion

3.946 Policy ER3 should be subject to update due to:

- Current consideration of the future of the hospital site that is likely to evolve during the update process.

4. Other matters for update

- 4.1 This section considers whether there are other aspects of the Local Plan in addition to the overall spatial strategy and the individual policies that need to be incorporated within any update. This consideration has emerged from the same process as already described for the individual policies.

Strategic and non-strategic policies

- 4.2 The 2021 version of the NPPF is much more explicit than the 2012 version, against which the Local Plan was examined, about the need for plans to be explicit about which policies are strategic in nature. Paragraph 21 states that plans should state which policies are strategic, and sets out some matters that they are to cover. The Local Plan does not currently identify policies as either strategic or non-strategic, and it is clear that the update will need to address this.

Policy gaps

- 4.3 In examining the headings used for the assessment of the individual policies (such as changes to national policy, local policy and the results of appeals), a number of areas have been identified where there is a potential gap in Local Plan policy that would need to be filled.
- 4.4 One such area is digital infrastructure. It has already been identified that there is a need to update policy CC9 to ensure that digital infrastructure is appropriately prioritised within the general infrastructure list. However, the importance of digital infrastructure is strongly emphasised in the Thames Valley Berkshire Recovery and Renewal Plan, published in 2020. The latest version of the NPPF (paragraph 114) also specifically highlights the importance of policies addressing digital infrastructure, which was not present in the 2012 version against which the existing plan was examined:

“Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”

- 4.5 Another possible issue is in terms of residential basements. As development pressure continues on potentially increasingly scarce sites, the Council is likely to see further proposals that would see residential provided at basement level. Such accommodation brings its own challenges, including outlook from such properties and access to daylight and sunlight. Basements are not a matter that is currently explicitly addressed within the plan, and proposals so far have been assessed against general policies around amenity such as CC8, and some of these cases have ended up at appeal. An update offers the opportunity to assess whether the Local Plan can add anything that would improve the quality of accommodation provided.
- 4.6 Another possible matter for further policy coverage is walking. There is an existing policy TR4 dealing with cycle routes and facilities, but no equivalent for walking.

Walking and cycling are both particularly promoted by the latest version of the NPPF, as well as by other local policy. In particular, the Local Cycling and Walking Infrastructure Plan (LCWIP) was published in March 2020 and identifies a network of both walking and cycling routes, falling under different categories, each of which has differing measures associated with it. Consideration of whether this should be supported by additional planning policy is required.

- 4.7 It is worth noting that the possible policy gaps above will not necessarily require a wholly new policy, and can potentially be factored into updates to existing policy. Nor is it necessarily the case that any changes need to be made at all, but it is worth highlighting these matters at this point to ensure that the need for update is at least considered.

Infrastructure delivery plan

- 4.8 Section 10 of the Local Plan contains an Infrastructure Delivery Plan, which is centred on a summary Infrastructure Delivery Schedule, which identifies the key infrastructure requirements to support the level of growth identified and how they will be secured. There are several reasons why this Infrastructure Delivery Plan should be part of any update of the Local Plan:

- There will be updates to the amount of development to be provided within relevant policies such as H1, EM1 and RL2, and the changes in approach to assessing housing need in particular may place considerable additional infrastructure burdens on Reading;
- New or amended site allocations in order to deliver different levels of need, in particular for housing, may provide particular opportunities to deliver specific types of essential infrastructure or may generate site-specific pressures that need to be addressed;
- The changing way in which infrastructure funding works, for example with recent changes to pooling restrictions to Section 106 agreements and the forthcoming introduction of the Infrastructure Levy may mean a need for a different approach to funding infrastructure that needs to be reflected in the plan;
- Some of the specific schemes highlighted in the plan have been completed or have been amended, and these changes need to be reflected;
- New local strategies, in particular LTP4, are likely to identify new projects or initiatives that help to deliver the level of growth required;
- New funding opportunities have arisen, and have for instance resulted in the award of funding for a relocated library and new performance space at the Hexagon;
- There have been some changes to infrastructure providers that may enable a reconsideration of how, when and where infrastructure improvements can be secured, for instance the change in responsibility for primary healthcare provision from Clinical Commissioning Groups to Integrated Care Boards;

- There are new pressures arising on local infrastructure that may need to be addressed in particular, for instance there is some concern that modern demands on the electricity grid such as electric vehicle charging or air-source heat pumps may necessitate upgrades in the network in some locations; and
- The Infrastructure Delivery Plan in any case needs to be a live document that is updated periodically to ensure that the right infrastructure continues to be delivered at the right time.

Monitoring framework

- 4.9 The Monitoring Framework in section 11 of the Local Plan will require an update, particularly where it refers to specific targets for levels of development that are expected to be superseded. Updates of relevant monitoring indicators and targets would be included within the wider update of those respective policies, and the Monitoring Framework would simply be updated as a consequence of those changes rather than consideration in its own right.

5. Conclusions and next steps

5.1 In conclusion, a need has been identified to update 45 of the 90 policies in the Local Plan. Therefore, a partial update rather than a full update of the Local Plan is required, to cover those policies identified.

5.2 Table 5.1 summarises the conclusion for each of the policies.

Table 5.1: Summary of whether an update is required to individual policies

Policy ref	Title	Update required, and reasons for update
CC1	Presumption in favour of sustainable development	No change resulting in the need for update identified
CC2	Sustainable design and construction	Update required. Reason: changes to building regulations, Future Buildings Standard, action from Climate Emergency Strategy on 'water neutrality', lessons from appeal decision
CC3	Adaptation to climate change	Update required. Reason: Climate Change Adaptation Plan published
CC4	Decentralised energy	Update required. Reason: take account of further district energy work, action from Climate Emergency Strategy
CC5	Waste minimisation and storage	No change resulting in the need for update identified
CC6	Accessibility and the intensity of development	No change resulting in the need for update identified
CC7	Design and the public realm	Update required. Reason: national policy changes, requirement for design codes, incorporation of neurodivergence
CC8	Safeguarding amenity	No change resulting in the need for update identified
CC9	Securing infrastructure	Update required. Reason: changes to CIL regulations regarding pooling restrictions, new Infrastructure Levy, need to identify infrastructure priorities of any increased level of development, lack of reference to digital infrastructure
EN1	Protection and enhancement of the historic environment	No change resulting in the need for update identified
EN2	Areas of archaeological significance	No change resulting in the need for update identified
EN3	Enhancement of conservation areas	No change resulting in the need for update identified
EN4	Locally important heritage assets	Update required. Reason: address issues from appeal decisions, need for slight amendment to wording.
EN5	Protection of significant views with heritage interest	No change resulting in the need for update identified
EN6	New development in a historic context	No change resulting in the need for update identified
EN7	Local green space and public open space	Update required. Reason: changing boundaries to take account of development at e.g. Mapledurham Playing Fields,

		Palmer Park, taking account of Playing Pitches Strategy
EN8	Undesignated open space	No change resulting in the need for update identified
EN9	Provision of open space	No change resulting in the need for update identified
EN10	Access to open space	No change resulting in the need for update identified
EN11	Waterspaces	No change resulting in the need for update identified
EN12	Biodiversity and the green network	Update required. Reason: implications of the Environment Act in particular regarding Biodiversity Net Gain, actions from Nature theme of Climate Emergency Strategy, address issue from appeal decision
EN13	Major landscape features and areas of outstanding natural beauty	Update required. Reason: review of Chilterns AONB boundary underway
EN14	Trees, hedges and woodlands	Update required. Reason: incorporation of Tree Strategy policy, implications of appeal decision on large canopy trees
EN15	Air quality	No change resulting in the need for update identified
EN16	Pollution and water resources	No change resulting in the need for update identified
EN17	Noise generating equipment	No change resulting in the need for update identified
EN18	Flooding and Sustainable Drainage Systems	No change resulting in the need for update identified
EM1	Provision of employment development	Update required. Reason: need for fresh assessment of employment needs taking account of Covid, Brexit etc and any changes in housing provision
EM2	Location of employment development	Update required. Reason: providing for additional housing or results of employment needs assessment may require release of protected employment land
EM3	Loss of employment land	No change resulting in the need for update identified
EM4	Maintaining a variety of premises	No change resulting in the need for update identified
H1	Housing provision	Update required. Reason: new national methodology for housing need and other national policy changes, monitoring of housing delivery so far, need for new land availability assessment to identify capacity, need for further co-operation with adjoining authorities
H2	Density and mix	Update required. Reason: new housing needs assessment will include needs for different sizes of homes, difficulty in achieving existing policy targets, lack of self-build provision, national policy on minimum densities.
H3	Affordable housing	Update required. Reason: changes to national policy including First Homes, tenure expectations as set out in SPD, incorporate policy basis for deferred contribution,

		new housing assessment will include assessing affordable housing need, need for updated whole plan viability assessment, current delivery of affordable housing below need.
H4	Build to rent schemes	Update required. Reason: lessons from new form of development
H5	Housing standards	Update required. Reason: changes to building regulations, Future Homes Standard, greater flexibility for sustainability standards in national policy, dpotential changes to need for wheelchair homes to be included in housing needs assessment.
H6	Accommodation for vulnerable people	Update required. Reason: proposed changes to national policy to emphasise retirement housing, new housing assessment will include assessing need for vulnerable groups.
H7	Protecting the existing housing stock	Update required. Reason: enable proposals that would result in loss of overall dwellings if it increases family housing.
H8	Residential conversions	Update required. Reason: incorporation of approach in new Residential Conversions SPD, implications of appeal decisions.
H9	House extensions and ancillary accommodation	No change resulting in the need for update identified
H10	Private and communal outdoor space	No change resulting in the need for update identified
H11	Development of private residential gardens	No change resulting in the need for update identified
H12	Student accommodation	No change resulting in the need for update identified
H13	Provision for gypsies and travellers	No change resulting in the need for update identified
H14	Suburban renewal and regeneration	No change resulting in the need for update identified
TR1	Achieving the transport strategy	Update required. Reason: take account of LTP4
TR2	Major transport projects	Update required. Reason: remove completed projects and include major schemes and initiatives from LTP4.
TR3	Access, traffic and highway-related matters	No change resulting in the need for update identified
TR4	Cycle routes and facilities	Update required. Reason: to take routes in Local Cycling and Walking Infrastructure Plan into account, reflect increased emphasis in national policy.
TR5	Car and cycle parking and electric vehicle charging	Update required. Reason: national policy on parking standards, to ensure that EV charging standards reflect most up to date position, implications of appeal decision
RL1	Network and hierarchy of centres	No change resulting in the need for update identified
RL2	Scale and location of retail, leisure and culture development	Update required. Reason: to take account of new assessment of retail and leisure needs taking account of post-Covid shopping patterns, monitoring data showing net loss

RL3	Vitality and viability of smaller centres	Update required. Reason: reflect changes to the use classes order, address high levels of vacancy in certain centres
RL4	Betting shops and payday loan companies	No change resulting in the need for update identified
RL5	Impact of main town centre uses	No change resulting in the need for update identified
RL6	Protection of leisure facilities and public houses	No change resulting in the need for update identified
OU1	New and existing community facilities	No change resulting in the need for update identified
OU2	Hazardous installations	Update required. Reason: implications of changes to AWE Burghfield Detailed Emergency Planning Zone
OU3	Telecommunications development	Update required. Reason: changes to telecoms permitted development rights, changing national policy, roll-out of new technologies
OU4	Advertisements	No change resulting in the need for update identified
OU5	Shopfronts and cash machines	No change resulting in the need for update identified
CR1	Definition of Central Reading	No change resulting in the need for update identified
CR2	Design in Central Reading	Update required. Reason: national policy changes, requirement for design codes, implications of appeal decisions.
CR3	Public realm in Central Reading	No change resulting in the need for update identified
CR4	Leisure, culture and tourism in Central Reading	No change resulting in the need for update identified
CR5	Drinking establishments in Central Reading	Update required. Reason: to reflect any changes as a result of Cumulative Impact Assessment.
CR6	Living in Central Reading	Update required. Reason: changing national policy around residential densities in centres, need to consider appropriate mix to be achieved.
CR7	Primary frontages in Central Reading	Update required. Reason: reflect changes to the use classes order.
CR8	Small shop units in Central Reading	No change resulting in the need for update identified
CR9	Terraced housing in Central Reading	No change resulting in the need for update identified
CR10	Tall buildings	No change resulting in the need for update identified
CR11	Station/River Major Opportunity Area	Update required. Reason: changes to circumstances on existing sites, implications of appeal decision, impact of density approach in town centre.
CR12	West Side Major Opportunity Area	Update required. Reason: changes to circumstances on existing sites, impact of density approach in town centre.
CR13	East Side Major Opportunity Area	Update required. Reason: changes to circumstances on existing sites, impact of density approach in town centre.

CR14	Other sites for development in Central Reading	Update required. Reason: changes to circumstances on existing sites, potential addition of further sites
CR15	The Reading Abbey Quarter	Update required. Reason: to take into account opportunity for Reading Prison to enhance the wider Abbey Quarter.
CR16	Areas to the north of Friar Street and east of Station Road	No change resulting in the need for update identified
SR1	Island Road Major Opportunity Area	Update required. Reason: changes to existing sites, potential amendment to meet employment needs
SR2	Land north of Manor Farm Road Major Opportunity Area	No change resulting in the need for update identified
SR3	South of Elgar Road Major Opportunity Area	No change resulting in the need for update identified
SR4	Other sites for development in South Reading	Update required. Reason: changes to circumstances on existing sites, potential addition of further sites
SR5	Leisure and recreation use of the Kennetside areas	Update required. Reason: take proposals for wetland at Kennet Meadows into account.
WR1	Dee Park	No change resulting in the need for update identified
WR2	Park Lane Primary School, The Laurels and Downing Road	No change resulting in the need for update identified
WR3	Other sites for development in West Reading and Tilehurst	Update required. Reason: changes to circumstances on existing sites, potential addition of further sites
CA1	Other sites for development in Caversham and Emmer Green	Update required. Reason: changes to circumstances on existing sites, potential addition of further sites
CA2	Caversham Park	No change resulting in the need for update identified
ER1	Other sites for development in East Reading	Update required. Reason: changes to circumstances on existing sites, potential addition of further sites
ER2	Whiteknights Campus, University of Reading	Update required. Reason: take account of changes to university permitted development rights, any changes to UoR intentions
ER3	Royal Berkshire Hospital	Update required. Reason: respond to forthcoming decision on the future of the RBH.

5.3 In addition to updating the policies identified above, there is potentially a need to address identified policy gaps in terms of digital infrastructure, walking provision and basement accommodation, either as new policies or by amending existing policies.

5.4 Furthermore, the overall spatial strategy will also need to be updated in particular to amend references to possible developments in neighbouring authorities to

reflect the latest position in those authorities' plans. The vision and objectives are not considered to require update.

- 5.5 Finally, the potential changes in needs for development, in particular for housing development, will place demands on the need for infrastructure. There will need to be a significant enhancement to the Infrastructure Delivery Plan to ensure that the level of development proposed is supported by the essential infrastructure, delivered at the right time.

Appendix 1: List of relevant plans and strategies published since March 2018

National Planning Policy Framework (July 2021) - [National Planning Policy Framework - Guidance - GOV.UK \(www.gov.uk\)](#)

Reading Borough Council Corporate Plan 2022-25 - [Council Corporate Plan - 2022 to 2025 - Reading Borough Council](#)

Reading Climate Emergency Strategy - [our-plan-READING-CLIMATE-EMERGENCY-STRATEGY-2020-25-Final.pdf \(readingcan.org.uk\)](#)

Reading Climate Change Adaptation Plan - [Report A4 \(readingcan.org.uk\)](#)

Thames Valley Berkshire Recovery and Renewal Plan - [Thames Valley Berkshire LEP Recovery and Renewal Plan-compressed.pdf](#)

Housing Strategy for Reading 2020 to 2025 - [APPENDIX A Housing Strategy for Reading 2020-25.pdf](#)

Draft Reading Transport Strategy 2036 - [Reading_Transport_Strategy_2036_-_Consultation_Draft_May_2020.pdf](#)

Local Cycling and Walking Infrastructure Plan 2020-2036 - [Local Cycling and Walking Infrastructure Plan - Reading Borough Council](#)

Reading Rights of Way Improvement Plan 2023-2033 (Draft) - [Reading Rights of Way Improvement Plan Nov 2022.pdf](#)

Central and Eastern Berkshire Joint Minerals and Waste Plan - [JCEB Plan Consultation Document Proposed Submission V6 June 2020 \(reading.gov.uk\)](#)

Reading Biodiversity Action Plan - [Reading Biodiversity Action Plan](#)

Reading Tree Strategy - [Reading Borough Council Tree Strategy, March 2021](#)

Reading Playing Pitches Strategy - [Playing pitch strategy - Reading Borough Council](#)

Berkshire West Health and Well-Being Strategy 2021-2030 - [Berkshire West Health and Wellbeing Strategy \(HWBS\) 2021 - 2030 - Reading Borough Council](#)

Reading's All Age Autism Strategy 2022-2026 (Draft) - [raaas_2022-6_v6_onlineversion.pdf \(reading.gov.uk\)](#)

Affordable Housing Supplementary Planning Document - [Affordable Housing SPD, adopted March 2021 \(reading.gov.uk\)](#)

Design Guide to House Extensions Supplementary Planning Document - [Design Guide to House Extensions SPD, Adopted March 2021 \(reading.gov.uk\)](#)

Design Guide to Shopfronts Supplementary Planning Document - [Design Guide to Shopfronts Supplementary Planning Document, Adopted January 2022 \(reading.gov.uk\)](#)

Residential Conversions Supplementary Planning Document (Draft) - [to be added]

Bracknell Forest Local Plan Pre-Submission - [LP-CORE-001 Pre-Submission Bracknell Forest Local Plan \(March 2021\) \(1\).pdf](#)

South Oxfordshire Local Plan 2035 - [SODC-LP2035-Publication-Feb-2021.pdf](#) (southoxon.gov.uk)

West Berkshire Local Plan Review to 2039: Proposed Submission version - [LPR_2022-2039_Proposed_Submission_for_consultation_20_Jan_2023_for_web.pdf](#) (westberks.gov.uk)

Wokingham Local Plan Update: Revised Growth Strategy consultation - [LPU Revised Growth Strategy November 2021 \(9\).pdf](#)

Sustainable Design and Construction Supplementary Planning Document - [Sustainable-Design-and-Construction-SPD-Adopted-December-19.pdf](#) (reading.gov.uk)

Castle Hill, Russell Street and Oxford Road Conservation Area Appraisal - [Final-Russell-Street-Castle-Hill-CAA-March-2020.pdf](#) (reading.gov.uk)

St Peter's Conservation Area Appraisal - [St_Peters_CA_Appraisal_Final_Version_061118.pdf](#) (reading.gov.uk)