

# Council

15 October 2024



# Reading

Borough Council

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<b>Title</b>	Pre-Submission Draft Local Plan Partial Update
<b>Purpose of the report</b>	To make a decision
<b>Report status</b>	Public report
<b>Report author</b>	Mark Worringham, Planning Policy Manager
<b>Lead Councillor</b>	Councillor Micky Leng, Lead Councillor for Planning and Assets
<b>Corporate priority</b>	Healthy Environment
<b>Recommendations</b>	<ol style="list-style-type: none"><li>1. That the Pre-Submission Draft Local Plan Partial Update (Appendix 1) and accompanying Policies Map (Appendix 2) be approved for consultation.</li><li>2. That the responses to representations on the Local Plan Partial Update Consultation on Scope and Content (Appendix 3) be agreed.</li><li>3. That the Assistant Director for Planning, Transport and Public Protection be authorised to make any minor amendments necessary to the Pre-Submission Draft Local Plan Partial Update and accompanying Policies Map in consultation with the Lead Councillor for Planning and Assets, prior to consultation.</li><li>4. That Council agree that the Statement of Community Involvement (adopted 2014) remains an up-to-date basis for carrying out consultation on the Local Plan Partial Update as informed by the Review of the SCI in Appendix 4.</li><li>5. That the Pre-Submission Draft Local Plan Partial Update and accompanying Policies Map be authorised for submission to the Secretary of State should no significant issues arise during community involvement that would necessitate a substantive change to the document.</li><li>6. That the Assistant Director for Planning, Transport and Public Protection be authorised to make any non-substantive amendments necessary to the Pre-Submission Draft Local Plan Partial Update and accompanying Policies Map in consultation with the Lead Councillor for Planning and Assets, prior to their submission to the Secretary of State and prior to the consequent Public Examination of the Plan.</li><li>7. That the Pre-Submission Draft Local Plan Partial Update and accompanying Policies Map be brought back to a future meeting of Council should significant issues arise during community involvement that would necessitate a substantive change to the document.</li></ol>

## 1. Executive Summary

- 1.1. The Reading Borough Local Plan was adopted in 2019. There is a statutory requirement to undertake a review of a local plan within five years of adoption. A Local Plan Review to comply with this requirement identified that there was a need to undertake a Partial

Update of the Local Plan, and this was agreed by Strategic Environment, Planning and Transport committee on 23<sup>rd</sup> March 2023 (Minute 36 refers). The first consultation stage, Consultation on Scope and Content, was agreed by Strategic Environment, Planning and Transport on 15<sup>th</sup> November 2023 (Minute 20 refers), and consultation was carried out between 27<sup>th</sup> November 2023 and 31<sup>st</sup> January 2024.

- 1.2. On 27<sup>th</sup> June 2024, Strategic Environment, Planning and Transport Committee agreed an amended Local Development Scheme, which is the timetable for producing planning policy documents, including the Local Plan Partial Update (Minute 5 refers). This identified that the next consultation stage, known as Regulation 19 or Pre-Submission stage, would begin in November 2024.
- 1.3. This report therefore recommends undertaking consultation on the Pre-Submission Draft Local Plan Partial Update. The proposed Pre-Submission Draft is included as Appendix 1. A proposed Policies Map, showing the spatial extent of relevant policies in the plan, is included as Appendix 2. The report further recommends agreeing the responses to representations received on the Consultation on Scope and Content.
- 1.4. The report also requests that Council agree that the adopted Statement of Community Involvement (SCI, adopted 2014) remains up-to-date for the purposes of local plan making and should be used as the basis for carrying out consultation. A review of the degree to which the SCI is up-to-date is set out in Appendix 4.

## **2. Policy Context**

- 2.1. The Reading Borough Local Plan was adopted by Council on 4<sup>th</sup> November 2019 (Minute 28 refers). Since that point, the Local Plan has been the main consideration in determining planning applications within Reading.
- 2.2. There is a statutory duty for local planning authorities to review their local plans within five years of the adoption date. Such a review should determine whether there is a need to update the Local Plan in full or in part. A review of the Reading Borough Local Plan was therefore required to be undertaken by 4<sup>th</sup> November 2024. This review was reported to SEPT Committee on 23<sup>rd</sup> March 2023 (Minute 36 refers) and identified a need to carry out a Partial Update of the Local Plan, which would encompass around half of the 90 policies in the plan.
- 2.3. Changes to national policy and guidance, in particular in relation to the level of housing need for the authority, represent particular reasons why plans or individual policies may require updating. There have been a variety of changes to national policy, including new versions of the National Planning Policy Framework (NPPF) in July 2021, September 2023 and December 2023, with a recent consultation undertaken on further amendments. These make significant changes to how local plans are expected to identify housing need. This was the main reason that a need to update the Local Plan was identified, but there are a number of individual reasons for the particular policies.

## **3. The Proposal**

### ***Current position***

- 3.1 The first consultation stage in undertaking the Partial Update was a Consultation on Scope and Content under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This was a discussion paper on how policies should change rather than a full draft. Strategic Environment, Planning and Transport Committee on 15<sup>th</sup> November 2023 approved this document for consultation (Minute 20 refers), and consultation was undertaken between 27<sup>th</sup> November 2023 and 31<sup>st</sup> January 2024.
- 3.2 The Council received around 159 written representations to the Consultation on Scope and Content. The representations that were received were often quite detailed, and a total of approximately 1,063 individual comments were made.
- 3.3 In summary, the following were some of the main points emerging from consultation:

- To extend the plan period to ensure a 1 or 2 year buffer period to safeguard against any delays upon submission to the Planning Inspectorate.
  - Sustainability policies (e.g. CC2 (Sustainable Design and Construction) and H5 (Standards for New Housing)) should ensure compliance with latest NPPF requirements (December 2023) to avoid duplication with building regulation requirements, and the Written Ministerial Statement (December 2023) relating to local efficiency targets.
  - Extensive support for removing development allocations of Land at Kentwood Hill (WR3s) and Armour Hill (WR3t) and designating them as a Local Green Space (over 60 representations made in support of this).
  - Resistance from developers and landowners to increase the tree canopy cover (Policy EN14). A mixture of responses were received in relation to Biodiversity (EN12), with some advocating for a 20% Biodiversity Net Gain requirement, whilst others felt that 10% was appropriate given the predominantly urban borough.
  - A preference from planning agents/landowners to adopt the standard methodology as set out under the NPPF 2023 (i.e. a target of 878 dwellings per annum) (Policy H1) as well as advocating for higher density standards (Policy H2).
  - Concerns regarding viability and quality of dwellings should the amount of family housing be increased, particularly within the town centre (Policy H2)
  - AWE & MOD requested a more precautionary approach to development within the extended DEPZ (Policy OU2) e.g. that the Local Plan does not allocate land for housing or other uses which will increase the risk of the population within the DEPZ.
  - Requests to re-open existing policies which did not at this stage comprise part of the Local Plan Partial Update, for example, policies EN1 (Protection and Enhancement of the Historic Environment), EN9 (Provision of Open Space), EN11 (Waterspaces), EN18 (Flooding and Drainage) and CR10 (Tall Buildings).
  - Additional sites were put forward for development during the consultation, set out below:
    - Remainder of Reading Golf Club, west of Kidmore End Road (out of Borough)
    - The Oracle sites (subject to current applications)
    - Land at Portman Road, Reading (subject to current application)
    - 20-22 Duke Street
    - 11 Basingstoke Road
  - Allocated sites within the existing Local Plan were promoted to increase their capacity or change scope (e.g. Napier Court, Caversham Park, and Queens Road / Watlington Street).
- 3.4 The representations received were taken into account in preparing the draft Local Plan Partial Update. A full schedule of the representations, including proposed Council responses to those representations, is set out as Appendix 3.
- 3.5 On 27<sup>th</sup> June 2024, Strategic Environment, Planning and Transport Committee agreed an amended version of the Local Development Scheme (LDS) (Minute 5 refers). The LDS is a document that sets out the scope and timetable of local development documents to be prepared including the Local Plan, and maintaining a LDS is a requirement for every local planning authority. This amended version of the LDS proposed that the second and final consultation on the Local Plan Partial Update, under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, would be timetabled for November 2024. This enables consultation on a draft document to begin at the time that

the existing Local Plan becomes five years old, to try to reduce any period where there is a policy gap.

***Option proposed: Local Plan Partial Update***

- 3.6 The proposal is that consultation be undertaken on a Pre-Submission Draft Local Plan Partial Update, under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Pre-Submission Draft is set out at Appendix 1. It is accompanied by a Policies Map, set out at Appendix 2, which shows the spatial extent of any relevant policies in map form. Both documents would be subject to consultation.
- 3.7 This is the final timetabled opportunity for public consultation on the document. Consultation is expected to take place for a six-week period, as required by the relevant legislation, during November and December 2024, ensuring that the consultation is complete by Christmas.
- 3.8 Much of the Pre-Submission version continues the changes to policies that were proposed in the Consultation on Scope and Content in November 2023. However, there are a number of important changes from that previously agreed approach that are worth highlighting in particular:
- A new policy (CC10) requiring submission of a Health Impact Assessment to understand impacts on public health and healthcare infrastructure;
  - Changes to policy EN18 on flooding at the request of the Environment Agency to better reflect national policy;
  - The inclusion of an 'urban greening factor', which calculates the degree to which a development proposal helps to green the urban environment;
  - An increase in the planned amount of housing per year from approximately 800 to 825;
  - Increases in the minimum densities proposed in policy H2 in particular in the town centre to better reflect national policy on needing to secure density increases;
  - A change is proposed to CR10 on tall buildings, which was not previously within the scope of the update, to better reflect the original evidence and introduce additional flexibility;
  - A change to the boundary of site WR3s: Land at Kentwood Hill to exclude part of the site which has particular biodiversity significance and inclusion of that land as part of the Local Green Space in policy EN7;
  - The previous consultation stage did not set out which of the possible development sites would be included within the draft plan. The following additional sites are now proposed to be identified for development and change as follows:
    - CR14g: The Oracle Riverside East (250-370 dwellings)\*
    - CR14n: Reading Central Library, Abbey Square (22-32 dwellings)
    - CR14o: 100 Kings Road (40-60 dwellings)\*
    - CR14p: Queens Wharf, Queens Road (9-13 dwellings)\*
    - CR14q: Havell House, 62-66 Queens Road (14-20 dwellings)\*
    - CR14r: John Lewis Depot, Mill Lane (76-110 dwellings)
    - CR14s: 20-22 Duke Street (12-18 dwellings)\*
    - CR14t: Aquis House, 49-51 Forbury Road (39-59 dwellings and potential net gain of offices)
    - CR14u: 33 Blagrove Street (20-30 dwellings)

- CR14v: 2 Norman Place (130-190 dwellings)
- CR14w: Reading Bridge House, George Street (150-230 dwellings)
- CR14x: Part of Tesco Car Park, Napier Road (57-85 dwellings)
- CR14y: Kennet Place, Kings Road (84-126 dwellings)
- CR14z: Sapphire Plaza, Watlington Street (50-74 dwellings)
- CR14aa: Part of Reading College, Kings Road (31-47 dwellings)
- CR14ab: 160-163 Friar Street (28-42 dwellings)\*
- SR4g: Reading Link Retail Park, Rose Kiln Lane (150-220 dwellings)
- SR4h: 11 Basingstoke Road (130-200 dwellings)\*
- SR4i: 85-87 Basingstoke Road (12-15 dwellings)\*
- SR4j: Land at Warwick House, Warwick Road (10 dwellings)\*
- SR4k: Former Sales and Marketing Suite, Drake Way (15-23 dwellings)
- SR4l: Land at Drake Way (20-30 dwellings)\*
- WR3u: 132-134 Bath Road (17-25 dwellings)
- WR3v: Former Southcote Library, Coronation Square (15-23 dwellings)
- WR3w: Part of Tesco Car Park, Portman Road (46-68 dwellings)
- WR3x: 1-15 St Georges Road (11-17 dwellings)\*
- WR3y: 72 Berkeley Avenue (9-13 dwellings)
- CA1h: Hemdean House School, Hemdean Road (continued education/ community use or 22-34 dwellings)\*
- ER1l: Princes House, 73A London Road (21-31 dwellings)\*
- ER1m: Land adjacent to 17 Craven Road (22-34 dwellings)\*
- ER1n: 51 Church Road, Earley (13-19 dwellings)\*

*(Those sites marked with an asterisk are additional to those subject to consultation at the previous stage, and have come from other sources including consultation responses, expired permissions and detailed work on development capacity)*

- 3.9 If, following consultation, no major changes that would affect the overall policy direction are required to the Local Plan Partial Update, it would then be submitted to the Secretary of State, and this report seeks delegation to make minor post-consultation changes that do not alter the policy direction. Submission is scheduled for the end of February 2025, and marks the starting point of the process of examination in public. An independent Inspector would be appointed to examine the plan and determine whether it is ‘sound’ and legally compliant. This would include a series of public hearings. If the Local Plan Partial Update is considered to be sound and legally compliant, it can be adopted. Depending on the length of the examination, adoption at a meeting of full Council could take place at the end of 2025 or beginning of 2026.
- 3.10 However, if consultation reveals a need to make major changes to the policy direction, the Local Plan Partial Update will need to be further revised and brought to a future Council meeting for an additional period of consultation.

***Option proposed: Statement of Community Involvement***

- 3.11 The Statement of Community Involvement (SCI) is a document which is part of a local authority’s set of planning policy documents, and its purpose is to set out how the local

planning authority will involve the community in producing planning documents, as well as on planning applications and pre-application enquiries. It is a statutory requirement that a local planning authority should have a Statement of Community Involvement. The Council adopted its current Statement of Community Involvement<sup>1</sup> at this Committee on 19th March 2014.

- 3.12 It is a statutory requirement that a SCI be reviewed within five yearly intervals from adoption to ensure that it is up-to-date. A review was carried out during 2019, and this concluded that the SCI was out of date purely in terms of what it says on neighbourhood planning. There are no groups in Reading that are constituted to carry out neighbourhood planning, but nonetheless it would be a statutory requirement for the SCI to state how the Council would support neighbourhood plans. None of the content about carrying out consultations on local plans was considered out of date. A consultation on amendments to the SCI was carried out in 2019. However, an amended version was never adopted because general Council-wide policy changes on consultation were anticipated at the time but did not transpire in practice.
- 3.13 This means that the SCI is now ten years old, out-of-date in terms of neighbourhood planning, and a second review ten years from adoption is overdue. A review of the SCI's content has been carried out and is included as Appendix 4. Whilst it remains the case that an update is required in terms of neighbourhood planning, and should be progressed when resources allow, the review concludes that the SCI's content in terms of how the Council should approach consultation on development plans (including the Local Plan) remains up-to-date. It is therefore recommended that Council agree that those elements of the SCI that pertain to development plans remain up-to-date and should continue to be used as the basis for consultations on the Local Plan Partial Update.

#### ***Other options considered***

- 3.14 The production of the Local Plan in line with the timetable identified in the LDS has already been agreed. Therefore, the alternative options are mainly around the format and content of the document, and these were discussed within the Consultation on Scope and Content that was undertaken between November 2023 and January 2024.
- 3.15 The main alternative option that could be considered to consulting on a Pre-Submission Draft Local Plan Partial Update at this stage is to delay the process. A potential reason to do so would be the recent consultation on changes to the National Planning Policy Framework (NPPF) that proposed major increases to the number of homes that Reading would need to provide alongside a number of other changes. The proposed transitional arrangements would mean that any significant delay to the next stage of the Local Plan Partial Update would require the plan to be prepared under the new version of the NPPF, which is likely to necessitate significant changes and some fresh evidence preparation. This would significantly delay progress on the plan, and extend the period where some of the existing Local Plan's policies are out-of-date, meaning a reliance on national policy. This would not be in the interests of swift production of a new plan and robust decision-making.

#### **Contribution to Strategic Aims**

- 3.16 The Local Plan Partial Update, through setting out the way Reading will develop to 2041, will contribute to the following priorities in the Corporate Plan 2022/25:
- Healthy environment: through ensuring that policies are up to date to achieve the highest environmental standards in development, respond to the Environment Act and incorporate the approach of the Local Transport Plan;
  - Thriving communities: through ensuring that housing needs are met insofar as possible, including affordable housing of the right tenure to meet Reading's needs; and
  - Inclusive economy: through updating policies to meet development needs for economic development uses.

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<sup>1</sup> [Statement of Community Involvement \(reading.gov.uk\)](https://www.reading.gov.uk/Statement-of-Community-Involvement)

## **4. Environmental and Climate Implications**

- 4.1. There is a requirement to undertake a sustainability appraisal of each stage of a Local Plan document. A sustainability appraisal assesses the impact of each policy, proposal and alternative option against a range of sustainability objectives covering environmental, economic and social matters. A Sustainability Appraisal of the Pre-Submission Draft has been prepared and will be published alongside the consultation as a background document. The environmental and climate implications of each policy and option are considered as part of that document.
- 4.2. In general terms, the most significant climate implications are that proposed approach would see more ambitious proposals for the energy efficiency of developments. The proposed updates to policies CC2 and H5 seek to further improve the performance of non-residential and residential developments respectively to continue to ensure that Reading's policies are of a level of ambition necessary to address the Climate Emergency. In addition, updates are proposed to policies CC3 and CC4 to strengthen requirements around climate change adaptation and the provision of decentralised energy respectively.
- 4.3. In terms of the level of development proposed, the sustainability appraisal highlights that new development will have environmental and climate implications in terms of matters such as emissions, resource use and waste generation, and highlights the need for these to be mitigated as part of the planning application process, in part through the application of updated development management policies as outlined above.

## **5. Community Engagement**

- 5.1. The Council's approach is that the widest community engagement on the Partial Update takes place at the earliest stage, as this is an opportunity for the public and other consultees to have most influence on how the plan develops and what areas it deals with. The Consultation on Scope and Content, undertaken between November 2023 and January 2024 was therefore a wide-ranging consultation exercise seeking to generate as many responses as possible. It included the following:
  - Directly emailing over 1,522 contacts on the Council's consultation lists, including statutory consultees, adjoining local authorities, Parish Councils, community and voluntary groups, commercial organisations, businesses and interested individuals.
  - A summary leaflet was produced, printed and distributed. Copies were made available to local cafes and community spaces such as Reading Town Hall, Reading Biscuit Factory, and Risc Global Café. Copies were also issued to RBC's internal Neighbourhood Initiatives Team who distributed these to local community centres.
  - Documents (including the Local Plan Partial Update, Sustainability Appraisal and Infrastructure Delivery Plan) were made available on the Council's website;
  - Physical copies of the summary leaflet and the Draft Local Plan were made available at Reading Borough Council local libraries.
  - An online video was created explaining the Local Plan process and made available on YouTube and the Council's website.
  - Social media assets were created and posted to online platforms such as Facebook, LinkedIn, Nextdoor and X (formerly Twitter) via RBC's main social media account.
    - Two targeted ads were paid for on Facebook between 1-7<sup>th</sup> December 2023 and 8-11<sup>th</sup> December 2023. The Reach for the targeted ads was as follows:
      - 1<sup>st</sup> targeted ad posted between 30<sup>th</sup> November – 7<sup>th</sup> December reached 5,520 with 136 engagements.

- 2<sup>nd</sup> targeted ad boosted between 8-11<sup>th</sup> December reached 6,430 accounts with 123 engagements.
  - A press release was prepared and distributed. From this, articles on the Local Plan Partial Update appeared in the local press.
  - Two drop-in events, where members of the Planning team were on hand to discuss issues arising together with exhibition boards, leaflets and copies of the Scope and Content was held at Reading Civic Offices on Thursday 7<sup>th</sup> December 2023 between 1-6pm and 11<sup>th</sup> December 2023 between 2-7pm.
  - An online webinar took place via Microsoft Teams on 13<sup>th</sup> December 2023 between 6-7pm, where Planning Policy officers gave a presentation on the Local Plan Partial Update and were available to answer any questions the attendees had. A recording of this was made available afterwards and subsequently uploaded to YouTube and the Council's website.
- 5.2. The Pre-Submission Draft consultation will be more focused around making the document available for comment, although it is also expected to feature drop-in events where officers will be available to discuss the Local Plan.
- 5.3. All consultation stages need to be undertaken in accordance with the Council's adopted Statement of Community Involvement, adopted in March 2014. As set out in section 3 of this report, Council has been asked to agree that the SCI remains an up-to-date basis for carrying out this consultation.

## **6. Equality Implications**

- 6.1. As set out in relation to section 5, a Sustainability Appraisal of the Pre-Submission Draft has been prepared and will be published alongside the consultation. One of the sustainability objectives is to "Avoid significant negative effects on groups or individuals with regard to race, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex or sexual orientation", and appraisal of all policies and allocations against this objective therefore addresses the equality implications of the policies.
- 6.2. In broad terms, the following implications have been identified:
- Policy H2, Density and mix: the effects would be positive in terms of age due to increasing provision of family housing;
  - Policy H5, Housing standards: the effects would be positive due to updates to reflect the need for wheelchair accessible homes;
  - Policy H7, Accommodation for vulnerable people: the effect would be significantly positive due to any update to account for needs for people requiring care or other forms of specific accommodation;
  - Policy H8, Residential conversions: there would be both positive and negative effects in terms of age, as the retention of family housing benefitting children could come at the expense of HMOs which often house young adults;
  - Sites including Reading Link Retail Park: effects on age would be positive where there is a focus on family housing.

## **7. Other Relevant Considerations**

- 7.1 There are none.

## **8. Legal Implications**

- 8.1 Local Plan documents, including updates, are produced under the Planning and Compulsory Purchase Act 2004. The process for producing local plans is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 19 states that, before submitting a Local Plan to the Secretary of State under section 20 of the 2004 Act, the proposed submission documents should be made available. This Pre-Submission Draft has been produced within this Regulation 19 requirement.



8.2 A Statement of Community Involvement is a requirement under Section 18 of the Planning and Compulsory Purchase Act 2004. Under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended 2017), a local planning authority must review a SCI within five years of the date of its adoption.

## 9. Financial Implications

9.1 The Local Plan Partial Update is funded from existing budgets. The costs incurred so far and expected to arise in future years from the Local Plan and associated planning policy work are summarised in the table below and compared to the budgeted amount:-

### 1. Revenue Implications

	<b>2023/24 £000</b>	<b>2024/25 £000</b>	<b>2025/26 £000</b>	<b>TOTAL £000</b>
Budgeted costs	185	163	120	468
Actual costs	17	0	0	17
Expected costs	0	270	143	413

9.2 The net cost of the Local Plan is reflected in existing budgets in overall terms across the three-year period of plan preparation, but, due to timescales in commissioning vital evidence work, more of the costs fall within the 2024/25 financial year than was expected when setting budgets.

### 2. Capital Implications

9.3 There are no capital implications.

### 3. Value for Money (VFM)

9.4 As part of the budget setting process, the business case included alternate options which could deliver different outcomes including not to undertake an update and to undertake an update with lower revenue implications. Value for money was tested and the revenue budget requirement to deliver the review was considered to be proportionate to the benefit it will deliver.

### 4. Risk Assessment

9.5 There are no risks as a result of the proposals in this report.

## 10. Timetable for Implementation

10.1 The timetable for carrying out the Local Plan Partial Update is set out in the Local Development Scheme, as agreed by Strategic Environment, Planning and Transport Committee on 27<sup>th</sup> June 2024 (Minute 5 refers).

## 11. Background Papers

11.1 There are none.

## Appendices

1. Pre-Submission Draft Local Plan Partial Update
2. Pre-Submission Draft Policies Map
3. Summary of representations received on Consultation on Scope and Content and proposed Council responses
4. Review of the Statement of Community Involvement