

# SUSTAINABILITY APPRAISAL OF MAIN MODIFICATIONS

JUNE 2019

## INTRODUCTION

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

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

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

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

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

## **NEED FOR SUSTAINABILITY APPRAISAL OF MAIN MODIFICATIONS**

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

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

### **MM2: Wording changes to Paragraph 4.1.5**

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

### **MM3: Wording changes to CC3 and Paragraph 4.1.6**

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

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

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

### **MM5: Changes to CC9 and 4.1.50**

A change is required, as follow:

## CC9: SECURING INFRASTRUCTURE

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

### COMMENTS:

#### CC9(i): No policy

The omission of an infrastructure policy would fail to deliver the infrastructure needed to support growth throughout the plan period. Without a policy, there will be negative effects with regard to most sustainability objectives, including CO<sub>2</sub> emissions (1), natural resource use (3), use of undeveloped land

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
		<p>(4), pollution (6), the natural environment (7), landscape/townscape character (9), health (11), community cohesion (12), sustainable transport (14), facility access (15), recreation/leisure/culture (17) and education (20). The most significant effects would occur with regard to housing provision (13) and economic growth (18) as strategic infrastructure is critical to achieving both objectives.</p> <p><b><u>CC9(ii): Continue with existing infrastructure priorities (SDPD DM3, Core Strategy CS9, CS13, CS32)</u></b>  This option aims to deliver needed infrastructure within a range of limited priorities. Each infrastructure category is assigned a priority level, with the highest priority given to those infrastructure types that are critical to delivering economic and residential growth, such as transport and education. Prioritising the most critical infrastructure needs helps to ensure that the most needed areas are not neglected. Existing priority for transport would bring positive effects with regard to CO<sub>2</sub> emissions (1), natural resource use (3), pollution (6) and sustainable transport (14) by encouraging sustainable modes and providing capacity near new development. Landscape and townscape character (9) would also improve by prioritising green space, public realm enhancements and street care. The most significant positive effects would occur with regard to housing provision (13) and economic growth (18). Providing the needed infrastructure would support new residential building by connecting residents to facilities and encourage business in Reading by strengthening transport links, employment skills initiatives and quality of life.</p> <p><b><u>CC9(iii): Continue with existing infrastructure approach, but do not require employment development to contribute to affordable housing needs</u></b>  This option has similar effects to that of option (ii), but, without any contributions to affordable housing, may bring negative effects with regard to housing (13) and the economy (18) as employment development will not be required to mitigate the effects of new employment development within the town and workers may struggle to find suitable accommodation. In the case of housing provision, the effects could well be <b>significantly negative</b>, although employment development may be able to mitigate its impacts through other routes.</p> <p><b><u>CC9(iv): New policy with additional priorities</u></b>  This option expands the range of infrastructure priorities. This may broaden the type of infrastructure provided and would ensure some provision, but it would likely lead to neglect of highest priority projects in a context of limited resources. A wider range of priorities would result in greater competition for limited funding which may reduce the level of provision achieved, e.g. affordable housing or education provision. A tendency toward negative effects would occur in relation to the highest priority infrastructure categories: health access (11), housing provision (13), sustainable transport (14), facility access (15), economic growth (18) and education (20). Other priorities would still see a tendency towards positive sustainability effects: CO<sub>2</sub> emission (1), natural resource use (3), undeveloped land (4), pollution (6), wildlife and the natural environment (7), landscape/townscape character (9), community cohesion (12) and recreation/leisure/culture (17).</p> <p><b><u>Conclusion</u></b>  Option (ii), as included in the Submission Draft, brings particularly positive effects, but option (iii) as amended through the main modifications also brings a range of positive effects.</p> <p><b><u>Habitat Regulations issues</u></b></p>																			

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

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

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

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

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

**MM8: Additional wording added to Paragraph 4.2.25**

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

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

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

**MM10: Additional wording added to Paragraph 4.2.65**

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

**MM11: Additional wording added to Paragraph 4.2.67 - 4.2.68**

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

**MM12: Additional wording added to Paragraphs 4.2.79 - 4.2.82**

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

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

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

**MM14: Insertion of new paragraph following Paragraph 4.2.99**

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

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

A change is required, as follow:

**EM1: PROVISION OF EMPLOYMENT DEVELOPMENT**

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

**COMMENTS:**

**EM1(i): No policy**

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





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

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

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

**MM17: New housing provision figures**

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

**H1: PROVISION OF HOUSING**

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

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

**COMMENTS:**

**H1(i): No policy**

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

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

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

**MM18: Changes to H2, 4.4.6 and 4.4.14**

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

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

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

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

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

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

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

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

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

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

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



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

**MM22: Additional wording added to Paragraphs 4.4.95 - 4.4.98**

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

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

## H12: STUDENT ACCOMODATION

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

### COMMENTS:

#### H12(i): No policy

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



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

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

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

**COMMENTS:**

**H13(i): No policy**

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

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

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

**Conclusion**

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

**Habitat Regulations issues**

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

**Equality issues**

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

**MM25: Additional wording added to paragraph 4.5.3**

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

**MM26: Additional wording added to TR2: Major transport projects**

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

**MM27: Additional wording added to Paragraph 4.5.8**

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

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

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

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

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

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

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

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

**MM31: Additional wording added to OU3: Telecommunications development**

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

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

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

**MM32: Deletion of wording and edits to Paragraph 4.7.26**

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

**MM33: Edits to CR1: Definition of Central Reading**

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

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

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

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

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

**MM36: Edit to CR10: Tall buildings**

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

**MM37: Edits to CR11a, Friar Street & Station Road**

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

**MM38: Edits to CR11b, Greyfriars Road Corner**

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

**MM39: Edits to CR11c, Station Hill & Friars Walk**

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

**MM40: Additional wording added to CR11g, Riverside**

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

**MM41: Additional wording added to Paragraph 5.4.12**



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

**MM42: Edits to CR12a, Cattle Market**

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

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

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

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

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

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

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

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

**MM46: Additional wording added to CR13b, Forbury Retail Park**

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

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

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

**CR13c: KENAVON DR AND FORBURY BUSINESS PARK**

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



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

**MM48: Edits of wording in CR13d, Gas Holder**

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

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

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

**MM50: Additional wording added to Paragraph 5.3.34**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### ~~WR4: POTENTIAL TRAVELLER TRANSIT SITE AT COW LANE~~

		Sustainability Objectives & Effect																			
Option No.	Option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
WR4(i) □□	No-policy	0	0	0	0	0	0	0	0	XX	0	XX	XX	?X	0	0	0	0	0	0	0
WR4(ii)	Traveller transit site	?X	?X	X	?X	X	X	?X	0	?	0	?X	?□	□□	□	?□	□X	?	0	□□	?□
WR4(iii)	Residential	?X	?X	X	?X	X	X	?X	0	?	0	?X	0	□	□	?X	0	?	0	0	?X
WR4(iv)	Offices/Leisure/Retail	?X	?X	X	?X	X	X	?X	0	?	0	0	0	X	□	?□	0	?	□	0	?□
<b>COMMENTS:</b>																					
<p><u><del>WR4(i): No policy</del></u>  <del>Not allocating the site will have largely neutral and negative effects. It would fail to provide housing (13), but would retain the site which currently contributes to landscape character near the Thames Path and Rivermead Leisure Centre. There would be significant negative effects with regard to character (9), health (11) and community (12) since failing to allocate a site would allow unauthorised encampments to continue occurring throughout the Borough.</del></p> <p><u><del>WR4(ii): Traveller transit site</del></u>  <del>Allocating the site for temporary occupation by caravans would provide housing for a marginalised group, bringing significant positive effects with regard to housing (13) and inequality/deprivation (19). Environmental effects would be negative, since the site is currently vacant and any redevelopment would use resources, produce waste, emit carbon, etc. (1-6). A transit site may negatively impact wildlife and the natural environment, but the site does not exhibit any particular biodiversity value (7). It is uncertain if the site would contribute to or detract from local character (9). This is largely dependent on management. Residents would be exposed to poor air quality (11). Provision of a traveller transit site would reduce crime (12) by allowing the police to take action against unauthorised encampments in other parts of the Borough. The site is in a fairly accessible location (14) and families would have access to healthcare and education (15, 20). Impacts on the nearby leisure centre are uncertain (17). Equality impacts are mixed (16). Because the site is adjacent to Flood Zone 3, the allocation may place a vulnerable community at risk, although it is possible to mitigate these effects by ensuring all caravans are situated in Flood Zone 2. Positive equality effects would occur through providing accommodation for a group that often suffers</del></p>																					

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

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

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

**CA1a: READING UNIVERSITY BOAT CLUB, THAMES PROMENADE**

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



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

## **COMMENTS:**

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

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

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

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

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

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

### **CA1a(iv): Leisure uses associated with meadows**

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

### **Conclusion**

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

### **Habitat Regulations issues**

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

### **Equality issues**

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

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

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

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

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

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

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

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

**MM62: Additional wording added to CA2: Caversham Park**

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

**MM63: Additional wording and edits to Paragraph 9.2.7**

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

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

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

**ER1c: LAND REAR OF 8-26 REDLANDS RD**

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

**COMMENTS:**

**ER1c(i): Do not allocate**

As there would be no development, undeveloped land would be preserved (4), but potential provision of housing would be adversely impacted (13).

**ER1c(ii): Residential development (12-18 dwellings) with potential for student accommodation or university uses**

As for any development, there would be a number of potential adverse effects in terms of CO<sub>2</sub> (1), energy use (3), waste (5) and pollution (6). In addition,

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

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

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

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

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

**MM67: Changed boundary of areas of biodiversity significance**

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