SEPT COMMITTEE - 20 NOVEMBER 2019

QUESTIONS FROM MEMBERS OF THE PUBLIC

1. Helen Palmer to ask the Chair of the Strategic Environment, Planning & Transport Committee:

Zero Carbon Standards

It seems that within the new Local Plan new build housing developments of ten homes or more are expected to meet zero carbon standards.

The Council has declared a climate emergency, and it would be in keeping with this declaration for the zero carbon stipulation to apply not only to ALL new builds, regardless of size of development, but to all building. If I was to build a house in my garden to sell for profit, I would expect to build it to Passive House standards at my own expense.

Please can the Council assure me that, when the Local Plan is published, zero carbon standards will be expected whenever building takes place, be it of houses, flats, offices, extensions, or any heated outbuildings or dog kennels requiring planning permission? Emergency means emergency.

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Ms Palmer for her question.

This Council has made clear its determination to tackle the climate emergency through achieving a carbon neutral Reading by 2030.

The Local Plan, which was adopted on 4th November, expects all developments of ten or more dwellings to meet zero carbon standards. Smaller housing developments will be required to deliver a 19% improvement in emissions over the 2013 Building Regulations standards. Major commercial developments or residential conversions will be expected to meet BREEAM 'excellent' standards, with minor developments achieving 'very good'. These are our expectations, and will form the basis for assessing new planning applications. Expectations which go beyond the Local Plan could not be applied.

National planning policy places a number of obstacles for Councils in setting local standards in terms of emissions. The Written Ministerial Statement of 25th March 2015 by Eric Pickles, then Secretary of State for Communities and Local Government, made clear that local planning authorities should not set energy requirements that exceed the equivalent of Code for Sustainable Homes Level 4, i.e. a 19% improvement over 2013 Building Regulations. This was in expectation of zero carbon homes being introduced via the Building Regulations, but the Ministerial Statement was not amended or withdrawn even when the government subsequently abandoned that commitment.

Therefore, the national policy position at the time the Local Plan was examined is that requiring zero carbon homes for any size of development would be contrary to national policy. The Council was one of the first in the country to attempt to introduce such standards

in conflict with national policy. This has meant that many other authorities have been watching the progress that Reading has made on this issue with interest.

In preparing the Local Plan, the Council therefore had to strike a careful balance between its sustainability ambitions and national policy. National policy is even more restrictive on what can be required of developers of sites of less than ten dwellings, considering that small developers in particular should not be over-burdened by planning requirements. Small sites were also proposed to be excluded from the government's now-abandoned changes to the Building Regulations.

The Council was already going significantly beyond what national policy allows for, and the fact is that a requirement that all sizes of site comply with zero carbon requirements would have stood very little chance of success in the public examination process. This would have resulted not only in a potential finding of unsoundness of the whole plan by the Planning Inspector, but also in delays in being able to implement the zero carbon requirements for larger sites.

Emissions and energy standards would be most effective in combatting the climate emergency if they were implemented nationally through the Building Regulations for all sizes of development. The Council has had to step in when national government abandoned its commitment to this, but has had to face significant national policy obstacles in doing so. In view of this, the positive examination outcome represents a considerable success.

2. Graham Smith to ask the Chair of the Strategic Environment, Planning & Transport Committee:

North Reading and Lower Caversham Flood Alleviation Scheme

Will the Chair of the Committee agree to meet with the Campaign for A Better Flood Alleviation Scheme to hear our concerns and for us to show her the potential impact of the scheme?

<u>REPLY</u> by the Chair of the Strategic Environment, Planning & Transport Committee (Councillor Barnett-Ward):

Thank you for your question and for the offer of a meeting with the Campaign for A Better Flood Alleviation Scheme. Councillor Richard Davies has had contact with the organisation on behalf of all the Caversham Ward Councillors, but I am very happy to arrange a meeting in my capacity as Chair of the Strategic Environment, Planning and Transport Committee.

3. Richard Lainchbury to ask the Chair of the Strategic Environment, Planning & Transport Committee:

North Reading and Lower Caversham Flood Alleviation Scheme - Anti-Social Behaviour

Construction of the defences will create areas that will encourage anti-social behaviour. The extensive walls and banks will provide sites for graffiti, vandalism and anti-social gatherings. How will the Council prevent and manage these problems?

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Mr Lainchbury for his question.

As of today no planning application has been submitted by the Environment Agency (EA) to Reading Borough Council as the local planning authority. The onus will be on the EA to seek to justify any planning proposals to the local planning authority and seek to mitigate any adverse impacts which may occur on their property and to explain how they would prevent acts of vandalism or wider anti-social behaviour.

The Council will want to be assured that the opportunity for any anti-social behaviour is designed out and that there are active plans in place to maintain the structures to a suitable standard. While the EA would manage the structures in the first instance, the Council is likely to maintain the structures in the long term.

4. Richard Lainchbury to ask the Chair of the Strategic Environment, Planning & Transport Committee:

North Reading and Lower Caversham Flood Alleviation Scheme - Ground and Surface Water

In order to be effective, the flood defences will prevent the passage of water. This will prevent ground and surface water from higher parts of Caversham and Emmer Green from reaching the river. How will properties be protected from the effects of trapped surface and groundwater?

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Mr Lainchbury for his question.

As of today no planning application has been submitted by the Environment Agency (EA) to Reading Borough Council as the local planning authority.

The Council, as the Local Planning Authority, are still in pre-application discussions with the EA and this question will be one that we will put to them to ensure that they address the potential consequences of their proposals.

The onus will be on the EA to seek to justify the proposals to the local planning authority and seek to mitigate any adverse impacts which may occur.

<u>5. Richard Lainchbury to ask the Chair of the Strategic Environment, Planning & Transport Committee:</u>

North Reading and Lower Caversham Flood Alleviation Scheme - Mobile Water Pumps

It is understood that in order to reduce construction costs of the scheme, a greater reliance will be placed on importing mobile water pumps in the event of flooding. How will the

council assure itself that sufficient effective pumps will be available at such periods of high demand?

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Mr Lainchbury for his question.

As of today no planning application has been submitted by the Environment Agency (EA) to Reading Borough Council as the local planning authority. The onus will be on the EA to seek to justify any planning proposals to the local planning authority and seek to mitigate any adverse impacts which may occur.

The Council, as the Local Planning Authority, is still at pre-application discussion stage and this issue will be one of the areas that officers will be seeking more information on in due course.

The Council has some in-house expertise but officers will also engage with the appropriate professional consultants to review all of the information provided by the EA and to seek further reassurances where needed.

<u>6. David Wynne to ask the Chair of the Strategic Environment, Planning & Transport Committee:</u>

North Reading and Lower Caversham Flood Alleviation Scheme - 5m "Exclusion Zone"

The Environment Agency has stated that there will be a 5m "exclusion zone" of trees and mature hedges from the edge of the defences. This means that a strip between 10m and 25m wide will be cleared of trees and hedges for the whole length of the defences. In some places, including Heron Island, this includes private gardens. Where individual properties are adversely affected by the scheme, how will the Council protect these residents' interests?

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Mr Wynne for his question.

As of today no planning application has been submitted by the Environment Agency (EA) to Reading Borough Council as the local planning authority. The onus will be on the EA to seek to justify any planning proposals to the local planning authority and seek to mitigate any adverse impacts which may occur.

As previously stated the Council, as the Local Planning Authority, is still at pre-application discussion stage and this issue will be one of the areas that officers will be seeking more information on in due course.

The planning application would need to set out the full implications of the scheme so that the Council and local residents are fully informed. The Council will then need to review the submission taking into account those implications before forming a final view as to whether or not to grant planning permission.

7. David Wynne to ask the Chair of the Strategic Environment, Planning & Transport Committee:

North Reading and Lower Caversham Flood Alleviation Scheme - Increased Flood Risk

750 properties are claimed to be protected by the scheme. However, increased water flow created by the Reading Bridge by-pass channel, together with a reduction of the existing flood plain due to the construction of the walls and embankments, will permanently increase the flood risk to 80 residential properties, including 47 on Heron Island, that are not protected by the defences. Where individual properties are adversely affected by the scheme, how will the Council protect these residents' interests?

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Mr Wynne for his guestion.

I refer to my response to question 6 from Mr Wynne. In reviewing any planning application, when it is submitted, the Council will need to understand the full implications of the development and take those matters into account in reaching a decision.

It may also be appropriate for those private landowners to seek their own independent legal advice.

8. David Wynne to ask the Chair of the Strategic Environment, Planning & Transport Committee:

North Reading and Lower Caversham Flood Alleviation Scheme - Removal of Trees

Based on the Environment Agency's stated tree exclusion zones, we estimate that 1,000 trees would be removed to make way for the walls and embankments. Some of these trees are landmark specimens and many are protected by Tree Preservation Orders. The loss of trees will also impact on wildlife along the Thames corridor, and will increase the impact of air pollution. How will the Council justify this extensive loss of trees with respect to the loss of visual amenity, and negative environmental impact?

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Mr Wynne for his guestion and refer him to my earlier answers to his guestions.

As of today no planning application has been submitted by the Environment Agency (EA) to Reading Borough Council as the local planning authority. The onus will be on the EA to seek to justify any planning proposals to the local planning authority and seek to mitigate any adverse impacts which may occur.

As previously referred to, the scheme is still at pre-app stage and it is not possible at this time for the Council to respond to such specific matters. However, the onus will be on the EA to seek to justify the proposals to the local planning authority, including any loss to trees and ecological habitat, and to propose how they can mitigate any adverse impacts which may occur.

If, or when, a planning application is submitted the proposals will be subject to statutory public consultation, at which point comments can be made and would be taken into account as part of the determination of the application.

At the time of any application the proposals will be considered against national planning policies and the new local plan, adopted in November 2019. These policies are robust in seeking to protect our environment and where justification is made to reduce trees or habitat appropriate mitigation will be required.

9. Michael Sage to ask the Chair of the Strategic Environment, Planning & Transport Committee:

Reading 2050 Refresh Workshop

Please could the Council report on the results of the Reading 2050 refresh workshop held on the 4th November and in particular about how Reading 2050 aligns with the objective of Reading becoming Carbon Neutral by 2030?

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Mr Sage for his question.

Councillors and senior officers, including the Executive Director for Economic Growth and Neighbourhood Services, attended the Reading 2050 workshop session on 4 November, to review progress towards achieving the vison and to consider what actions would support its future delivery. The workshop, which took place at the university, was attended by a number of guests from a wide array of backgrounds and specialisms.

The current Vision, which was launched in Autumn 2017, includes sustainable growth ambitions in order to achieve a 'green tech city' and other cultural aspiration for the town. If managed successfully, these proposals will accord with the Climate Change agenda.

You will see that today's SEPT Committee agenda contains a report which updates on the significant progress made to date by the Council's proactive approach to addressing climate change issues and its impact on Reading. The report also notes the scale of the on-going challenge. Reviewing the Vision and potentially setting out a timeline of opportunity and incremental steps towards it is timely in light of the adoption of the Local Plan.

10. Michael Sage to ask the Chair of the Strategic Environment, Planning & Transport Committee:

Reading's CO2 Emissions

What measure is used to assess Reading's CO2 emissions and can the Council confirm that the form of measurement is recognised (and by whom) and is appropriate?

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Mr Sage for his question.

The Council measures its own greenhouse gas emissions in accordance with the Greenhouse Gas (GHG) Protocol, a global standardised framework to measure GHG emissions, as recommended by government.

We use our own energy data from our meters and vehicle fleet data as collected through our internal energy management processes.

With respect to the wider Borough emissions the Council uses the Government's emissions data which is publicly available on the Governments website:

"UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2017"

This data uses a number of data sources but is primarily based on the national emissions inventory.

11. Michael Sage to ask the Chair of the Strategic Environment, Planning & Transport Committee:

Food Waste Collections

We understand that the collection of food waste will be implemented in October 2020. In the light of the Climate Emergency is there any way of bringing this date forward? Will the appropriate local facilities be available at the start of the collections to process the food waste into energy/fertiliser and where will this be located?

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Mr Sage for his question.

The kerbside collection of domestic food waste will begin in October 2020 and work is currently underway to prepare for the introduction of the new service. Unfortunately it is not feasible to bring the start date forward as the procurement of the resources required, such as (1) the new food waste collection vehicles; (2) the food caddies; (3) the recruitment of the new staff; and (4) the reorganisation of the existing rounds, all takes time to arrange.

In order to better inform the introduction of the new Boroughwide service five Early Adopter areas, each of about 500 properties, will begin the new service in July 2020 and the food waste collected will be processed from that date.

The food waste collected in Reading will be taken initially to the Household Waste Recycling Centre in Island Road where it will be added to the food waste being collected in Wokingham and taken in bulk to the Anaerobic Digestion plant in Wallingford, 16 miles north of Reading.

The methane gas produced by the process produces energy which is fed into the national grid and the liquid fertiliser is used to improve the fertility of agricultural land.

12. John Booth to ask the Chair of the Strategic Environment, Planning & Transport Committee:

Clean Air

Two years ago Reading Friends of the Earth presented a petition signed by over 400 people to this Committee calling for "a new air quality action plan to be put in place by 2018 with the necessary resources to cut all pollutant levels to below World Health Organisation guidelines by 2020."

One year ago, in answer to Question 2 on 21st November 2018, we were told that PM2.5 Particulate concentration was estimated to be above the WHO guide level in all three locations for which the Council had data - the worst being Caversham Road which was 60% above the guide level.

In October 2019 it was reported that research at King's College London found that admissions to hospital on days of high pollution were higher than the average. The study did not look at Reading in detail but reported that "Cutting air pollution in Oxford by one fifth would result in 77 less children with low lung function each year (long-term)" (page 29 in http://www.erg.kcl.ac.uk/Research/docs/personalised-health-impacts.pdf)

Please will the Council produce current estimates of the effect of air pollution on the health of people in Reading to guide its update of its Air Quality Action Plan?

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Mr Booth for his question.

I can confirm that air quality and the health of the residents of Reading remains a priority, and that Reading Borough Council will review and update its Air Quality Action Plan in 2020 in order to ensure that the Council's plans to tackle air pollution are as effective as they can be at reducing harmful levels of air pollution.

The action plan will be aligned with other emerging Council strategies such as the Local Transport Plan, Climate Change Strategy and the recently adopted Local Plan.

NO2 is the only pollutant exceeding a national objective, but PM10 and PM2.5 are also pollutants of concern due to their effects on health even at low concentrations. The Council's monitoring of these pollutants indicates that after years of stagnation the levels are beginning to fall again.

Public Health England figures estimate that in 2016, the percentage of all-cause mortality attributable to particulate air pollution from human activity was 5.9% in Reading, compared with 5.5% in the South East and 5.3% across England. This means that particulate air pollution contributed to an estimated 63 deaths in Reading in 2016.

The Council has a number of initiatives to improve air quality in the Borough including the recent award of £1.5 million of Government funding to upgrade 96 buses owned by Reading Buses.

Like many large towns and cities in the UK, parts of Reading are blighted by pollution and the Council has been leading the way to improve air quality by making public transport, cycling and walking more attractive.

13. John Booth to ask the Chair of the Strategic Environment, Planning & Transport Committee:

Climate Emergency

Reading Friends of the Earth note with approval that Reading's 'Pathway to Zero Carbon' (slideset used by Ben Burfoot at 'Planning for a Low Carbon Economy' meeting in April 2019) features retro-fitting improved insulation on homes and installation of heatpumps.

National Friends of the Earth has suggested that the target for the Reading area should be to up-grade insulation on around 4,000 homes per year and install 2,500 heat pumps per year.

Is the Council planning to pilot this with 'deep retrofit' of some of its own properties in 2020 to find out what techniques are most effective and so that the Council, the public, and local businesses can gain experience of the work as soon as possible?

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Mr Booth for his question.

The presentation given at the planning for a low carbon economy event in Reading showed one possible pathway for taking forward a net zero carbon Reading. In order for the Borough to remove its dependence on fossil fuels it is clear that a significant amount of energy

demand reduction must be achieved. As Mr Booth has indicated, this will require the establishment of 'deep retrofit' of housing to be delivered at scale over the next decade. Of particular importance is the high energy consuming aging housing stock which is 'hard to treat' as it has solid walls and these can be difficult and costly to insulate.

In order to accelerate the rate of delivery of retrofit into homes, it is anticipated that significant incentives will be needed ensure that the investment is made by householders. The Committee on Climate Change has made 36 recommendations in its report "UK housing: Fit for the Future". Whilst this report is comprehensive and unequivocal in its criticism of UK current policy, it remains clear that unless significant incentives can be brought forward soon, then it will not be possible to achieve Reading's aspirations to achieve a net zero carbon Reading by 2030. As the Intergovernmental Panel on Climate Change have recommended more rapid action in cities, it is, in the Council's view, imperative the Government invest in existing housing retrofit as a matter of priority.

The Council's own housing stock is predominantly more energy efficient than homes in the private sector due to the investment already made to insulate these properties. That said, the model assumed some significant reductions in this stock also. The Council is currently developing its new housing strategy and this document will address how the objectives of the Reading Climate Emergency Declaration and forthcoming Reading Climate Change Strategy can be achieved including action related to the retrofitting of properties.

QUESTIONS FROM COUNCILLORS

1. Councillor McGonigle to ask the Chair of the Strategic Environment, Planning & Transport Committee:

Chain Stores

There is an increasing sense of unease about the number of chain stores taking over our town.

Reading is at risk of becoming any town anywhere and losing its unique identity. As online shopping increases so the chain stores become less of a draw.

Places such as Brighton, Oxford and Bristol have continued to embrace areas and arcades specifically for small, independent traders who provide shopping diversity, vitality and stability that could future-proof the retail experience in Reading.

With more and more shoppers seeking out vegetarian, vegan, eco-friendly and handmade products, is this an opportunity that should not be missed?

REPLY by the Chair of the Strategic Environment, Planning & Transport Committee:

I invite Councillor Page, the Lead Councillor for Strategic Environment, Planning and Transport to make the response on my behalf.

REPLY by the Lead Councillor for Strategic Environment, Planning and Transport (Councillor Page):

I thank Cllr. McGonigle for her question.

Chain stores have for the last 40 plus years been a positive feature of the modern day retail landscape of Reading Town Centre, underpinning our strength as a regional shopping centre for the Thames Valley.

Most of these chains have been hit nationally by the down-turn in retailing and the move to increased online retailing. To its credit Reading has retained stores that have closed elsewhere, leading to the demise of high streets and the loss of many jobs in other local economies. Examples include Debenhams, Jessops, Clas Ohlson, Carluccios and New Look - although their continuing presence in Reading should not in any way lead to complacency on our part.

The chains are an important part of the town centre and not to be underestimated. They add to the offer and make Reading town centre a more attractive proposition to relocating global companies who boost our economy and create jobs directly and indirectly such as Ericcson, BMG Research, KPMG, Deloitte, PWC and SSE.

Despite the fact that we estimate there are 147 independents in the town centre, 80 of which are retail, the independents have always been relatively, and regrettably, 'in the shadows'.

Reading UK, who have operated the Business Improvement District in the town centre for the last 14 years, have invested a lot of energy and funds in helping and training the independents both to market them as a town centre presence and also online through social media (see www.readingindies.co.uk)

We do not have the luxury of a 'Lanes' or quarters, as they do in Brighton or Bristol, where independents can co-locate and have a greater presence and impact. In that regard we need

to be cognisant that the price of land and property in Reading is much higher than these other places.

The Council will always be looking for opportunities with investors and developers to create space for independents in new developments in the town centre. Indeed our recently approved new Local Plan contains Policy CR 8 relating to the importance of Small Retail Units in Reading, and this is set out in full below along with the appropriate Local Plan narrative.

Reading UK have gone some way to promote and facilitate weekly street food markets, art markets, a vegan market, and events that independents can get involved in such as Eat Reading in June and Reading on Thames Festival in September.

Reading UK this year will be running the Magical Xmas festival including arts and cultural events, with a Christmas theme, taking place every day in December up to Christmas. The independents are well represented; of the 40 events in December, 20 are in independent stores, 15 in outdoor spaces near independents and only a handful in the chain stores like John Lewis. See www.whatsonReading.com

Independents are always at the forefront of thinking in the town and we will continue working with Reading UK and the BID to support and promote them.

RBC LOCAL PLAN, ADOPTED 4/11/19 - Policy CR8

CR8: SMALL SHOP UNITS IN CENTRAL READING

Small shop units make an important contribution to the diversity of the centre. Some areas of the centre are particularly characterised by small units, of less than 75 sq m. These include the arcades, Cross Street, Queen Victoria Street, Union Street, and any other areas designated in the future.

Within the areas characterised by small shop units, the amalgamation of individual shop fronts will not be permitted.

Major new retail development (more than 2,500 sq m) for multiple units in the Primary Shopping Area should include some provision for a range of small shop units.

- 5.3.31 In promoting town centres' vitality and viability, national policy in the NPPF focuses development in town centres and states that policies will allow centres to "grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters" (paragraph 85). It also states that local planning authorities should actively plan for growth and manage the role and function of existing centres. This includes the range of sizes of shops, which can cater for different and varied retail offers.
- 5.3.32 Reading is known as being a major shopping destination with a wide offer of national multiple retailers. However, there is also an existing grouping of smaller retailers which adds diversity to the range of the centre, and planning can help to maintain this sector and allow it to grow.

Although controlling the occupiers of buildings is not within the remit of planning, it can have an effect on the size of units. Part of the retail mix and character of Reading centre is the presence of a number of small shop units including within the arcades and some of the smaller side streets. In order to ensure that the vitality, diversity and retail offer of the centre of Reading is maintained and enhanced, this policy seeks to retain these small retail units, and the provision of additional small units within new retail development.