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# Report to Reading Borough Council

by Louise Gibbons BA (Hons) MRTPI  
an Inspector appointed by the Secretary of State  
Date: 24 September 2019

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Planning and Compulsory Purchase Act 2004  
(as amended)  
Section 20

## Report on the Examination of the Reading Local Plan

The Plan was submitted for examination on 29 March 2018

The examination hearings were held on 25-28 September and 2-5 October of 2018

File Ref: PINS/E0435/429/10

## Abbreviations used in this report

AQA	Air Quality Assessment
AQMA	Air Quality Management Areas
BREEAM	Building Research Establishment Environmental Assessment Method
CIL	Community Infrastructure Levy
DtC	Duty to Co-operate
FEMA	Functional Economic Market Area
HELAA	Housing and Economic Land Availability Assessment
HMA	Housing Market Area
LANB	Local Authority New Build Programme
LP	Local Plan
MM	Main Modification
NPPF	National Planning Policy Framework
MOU	Memorandum of Understanding
OAN	Objectively Assessed Need
ONS	Office for National Statistics
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document
TBHSPA	Thames Basin Heaths Special Protection Area
WMS	Written Ministerial Statement

## Non-Technical Summary

This report concludes that the Reading Local Plan (LP) provides an appropriate basis for the planning of the Borough, provided that a number of main modifications (MMs) are made to it. Reading Borough Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared a schedule of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. In some cases, I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Ensuring that the LP reflects up to date evidence for housing supply
- Modifying the Cross-Cutting policies so that they are effective and consistent with national policy
- Amending the policies for the built environment so that they are consistent with national policy and positively prepared
- Ensuring the employment policies are positively prepared
- Amendments to Policy H3 to ensure it is justified and will be effective
- Amendments to Policy H13 to bring it in line with national policy and deleting Policy WR4
- Modifying the housing policies of the LP so that they will be effective
- Ensuring that the area strategies and site allocations policies are effective and positively prepared
- Various other changes to ensure the LP is up to date, internally consistent, effective and consistent with national policy.

## Introduction

1. This report contains my assessment of the Reading Local Plan (LP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF) 2012 (paragraph 182) makes it clear that in order to be sound a Local Plan should be positively prepared, justified, effective and consistent with national policy. The revised National Planning Policy Framework was published in February 2019. It includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining this Plan, the policies in the 2012 NPPF will apply. Unless stated otherwise, references in this report are to the 2012 NPPF. Likewise, where the Planning Practice Guidance (PPG) has been updated to reflect the revised NPPF, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Local Plan was published for consultation in November 2017. The Reading Local Plan submitted in March 2018 is the basis for my examination, it contained several changes incorporated by the Council as a result of the consultation, respondents were notified of these changes but not consulted on them. Where they relate to the soundness of the LP these have been included as recommended Main Modifications.

## Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form MM1, MM2, MM3 etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs including a number of the changes incorporated in the Submission LP and carried out sustainability appraisal of them. The MMs schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light, I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

## **Policies Map**

5. The Council must maintain an adopted policies (Proposals) map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the Proposals Map as set out in the Submission Draft Proposals Map.
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the LP's policies require further corresponding changes to be made to the proposals map. These further changes to the Proposals map were published for consultation alongside the MMs as Map A and F.
7. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Submission Draft Proposals Map and the further changes published alongside the MMs.

## **Assessment of Duty to Co-operate**

8. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
9. The Council has been proactive in this respect and have been actively engaged with the other Berkshire authorities and adjoining Councils since 2014. Key outcomes involving the Council include a Housing Market Area (HMA) with housing need figures, a Functional Economic Market Area (FEMA) and a Housing Land Availability Assessment methodology agreed by the six Berkshire unitary authorities. The Strategic Housing Market Assessment (SHMA) resulted in two HMAs, with a Western Berkshire HMA including West Berkshire, Reading, Wokingham and Bracknell Forest. Central and Western Berkshire authorities have also agreed an Economic Development Needs Assessment and a Retail and Commercial Leisure Assessment respectively. The Council have been engaged in an on-going basis with local authorities and other stakeholders in the matter of Gypsy and Travellers, Travelling Showpeople and Houseboat Dwellers.
10. The authorities of Chiltern and South Buckinghamshire do not agree with the definition of the HMA and FEMA and they consider that there should be a single Berkshire area based on evidence in 2014 (updated 2016) that considered the HMA and FEMA for Buckinghamshire. Nevertheless, noting the acknowledged limitations of the work for Buckinghamshire, I am also satisfied that the conclusions of the SHMA is robust in relation to its definition of the HMA for Western Berkshire. The Council had engaged South Buckinghamshire (now with Chiltern) constructively in early work on the LP

and the position of a lack of agreement between the authorities on the HMA and FEMA does not amount to a failure to meet the Duty to Co-operate.

11. The four Western Berkshire authorities have produced a West of Berkshire Spatial Planning Framework which considers opportunities for growth and infrastructure needs in that area. In addition, there is a Memorandum of Understanding (MOU) which establishes the principle that Reading's unmet housing needs should be met within the HMA. A MOU with adjoining South Oxfordshire District Council covers matters such as housing and economic development needs, transport and gypsy and traveller provision.
12. The Council have demonstrated co-operation on a range of matters including education and strategic transport working with both Oxfordshire and the other Berkshire authorities, Highways England and the Cross-Thames Travel Group. Co-operation between the Council and Historic England and Natural England has also been on-going.
13. Overall, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

## Assessment of Soundness

### Background

14. Once adopted it is intended that the LP will replace the Core Strategy (2008, amended 2015), Reading Central Area Action Plan (2009), and the Sites and Detailed Policies Document (2012, amended 2015).

### Main Issues

15. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified eight main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

**Issue 1 – Is the housing requirement justified and deliverable and has it been calculated in accordance with national policy and guidance, and will the Council be able to demonstrate a five-year supply of housing land on adoption of the Plan?**

#### *Demographic starting point*

16. The demographic starting point of 541 dwellings per annum in the 2016 SHMA is based on the 2012 household projections (with revisions including 2013 midyear estimates and an allowance for vacant homes). Since then, there have been two new sets of household projections, based on data from 2014 and 2016. The 2016 figures showed a much lower level of household growth for Reading of 396 homes per annum, which would have been problematic in terms of meeting the predicted economic growth in the

Borough. The 2014 figures showed a household growth of 515 households per annum and including the allowance for vacant homes results in a starting point of 541 homes. Prior to the release of the 2016 information, the Western Berkshire OAN (Objectively Assessed Need) Sensitivity Testing (EV034) was produced by the other three authorities in Western Berkshire and includes a re-based Sub-National Population Projection that incorporates Office for National Statistics (ONS) mid-year population estimates. This resulted in a starting point of 542 dwellings per annum. Given that the 2014 figures and sensitivity testing are very similar, and the 2016 figure was considerably lower, the starting point for Reading based on the 2012 household projections is a sensible approach.

### *Economic growth*

17. In terms of economic growth the SHMA considers 2013 based economic forecasts as well as more local economic considerations. The original economic forecast for Reading identified a job growth of 450 per annum but having regard to the role of central Reading as a key location for offices in central Reading the SHMA then includes an adjustment upwards to 735 jobs per annum and an uplift of an additional 33 dwellings per annum. Although the Western Berkshire OAN Sensitivity Testing document indicates a significant employment uplift may be required for Reading, this is based on a mid-point between two very different economic forecasts resulting in 538 jobs per annum to 1,087 jobs per annum respectively. The midpoint equates to a need for 759 homes per annum in Reading incorporating growth in office development and town centre improvements. Both the SHMA and sensitivity test have regard to the role of Reading in office development and improved transport connectivity with different results. Nevertheless, the economic growth components of the SHMA are not challenged by the other West Berkshire authorities, and the SHMA figure of 735 jobs per annum is based on a sensible set of assumptions.

### *London migration*

18. The approach within the SHMA in relation to London migration includes adjusting the figures to reflect a return to pre-recession migration. This results in an additional 68 dwellings per annum above the demographic starting point for Reading. The approach is supported by the Greater London Authority, and it is justified on the basis of being a realistic projection of likely migration into the Reading area during the plan period.

### *Affordable Housing Need*

19. The affordable housing need has been calculated in accordance with the guidance in the PPG. The methodology incorporates an assessment of current unmet gross need, newly arising affordable housing need, household formation rates and affordable housing stock. The level of need across the Western Berkshire HMA equates to over 40% of overall housing need based on the demographic starting point and housing need resulting from economic growth. The SHMA identifies an affordable housing need of 406 homes per annum for Reading (over 58% of the total need). The Local Plan Viability

Assessment (EV006) demonstrates that the requirements for affordable housing in the LP are realistic. For Reading Borough, the SHMA takes account of seeking to improve affordability and this provides an uplift of 57 dwellings per annum. The SHMA therefore provides a reasonable evidential basis for the assessment of affordable housing needs in Reading.

### *The OAN for the Borough*

20. The SHMA has considered a range of housing market signals, and the 2012 PPG does not prescribe what level of uplift should be applied. Nevertheless, the uplift for Reading includes London migration, improving affordability and has regard to the predicted economic growth in the Borough. Together these result in the overall uplift for Reading equating to approximately 28% above the demographic starting point, which is reasonable. The OAN for the overall Western Berkshire HMA as set out in the SHMA is 2,855 homes per annum split between the four authorities. Reading's OAN figure is 699 dwellings per annum which equates to a total of 16,077 homes over the LP period up between 2013 and 2036.
21. I am satisfied that the approach within the SHMA to the demographic starting point, as it relates to Reading, is appropriate. The approach to OAN taken in the overall SHMA area through considering London migration, economic growth and affordable housing formation rates and affordability is sensible.

### **Housing Provision**

22. The expectation in the NPPF is that objectively assessed need for market and affordable housing is met within the housing market area. Reading has a tightly defined urban area and provision of new housing involves a very significant reliance on previously developed land. The position in Reading is such that there will be a shortfall of housing against the requirement of 16,077. The provision of at least an additional 15,433 homes over the LP period (up to 2036) is therefore set out in Policy H1 (Provision of Housing).
23. Policy H1 indicates that the Council will work within the Western Berkshire HMA to ensure that the shortfall will be met within the plan period. There are arrangements in place with the other three Western Berkshire authorities through the MOU that includes a recognition that Reading could not meet its full needs; that needs arising within the HMA should be met within the HMA and that the authorities would work together to keep the issue under review in plan-making. The approach in Policy H1 to meeting the shortfall, supported by the existence of the MOU and evidence of close joint working between the authorities is therefore justified and it will be effective.
24. However, this is subject to **MM17** which is necessary to update the latest position in Policy H1 on housing figures incorporating completions, new permissions and changes to allocations. This amends the figure upwards from 15,433 to 15,847 with the annual average changing from 671 to 689 homes delivered per annum. The changes in MM17 show that the shortfall is



now reduced from 644 to 230 homes over the plan period. Consequential changes to the supporting text including references to the Housing and Employment Land Availability Assessment (HELAA) are made as well as amendments to Figure 10.1 and Figure 11.1.

25. The assumptions on development capacity for sites is mainly based on a 'pattern book approach' based on densities which have been achieved in previous years but incorporating a view that higher densities may be achieved. The overall methodology in the HELAA (EV013-EV015) was considered reasonable by the other authorities within the HMA. MM17 provides further detail on how sites have been assessed, and subject to this MM the approach and methodology to site assessment is appropriate and robust.

#### *Five Year Supply*

26. The NPPF indicates at paragraph 47 that a 5% buffer to ensure competition and choice should be applied in the assessment of housing land supply unless there is a record of persistent under delivery of housing. Over a 20-year period, there were only four years where delivery was below requirements in the period between 2010 and 2014. This is a short period and it does not represent a persistent state of under-delivery. The application of a 5% buffer is therefore appropriate in the context of Reading and would be consistent with national policy. There is a small shortfall from between 2013 and 2018 of 53 homes and this is included within the first five years of the supply in accordance with the 'Sedgefield' method.
27. MM17 also updates the table at paragraph 4.4.4 which indicates how the provision is expected to be delivered, and the housing trajectory has been revised at Appendix 1. MM17 also includes additional supporting text at paragraph 4.4.5 to clarify that the Annual Monitoring Report will highlight any issues with housing delivery, and how these would potentially be addressed. The housing trajectory at Appendix 1 of the LP realistic and aligns broadly with the Infrastructure Plan at Section 10.3 of the LP.
28. The five-year housing requirement incorporates the undersupply figure. The Council's assumptions on demonstrating a five-year supply of housing land are robust and there would be a healthy 6.6 years supply.

#### **Overall conclusion on housing need and supply**

29. Taking into account the above, including the recommended MM, the provision in the LP for housing development over the plan period is justified and deliverable, and the Council would be able to demonstrate a five-year housing land supply upon adoption of the LP.

#### **Issue 2 - Are the Cross-Cutting Policies justified, effective and consistent with national policy?**

30. Policy CC1 (Presumption in Favour of Sustainable Development) seeks to take a positive approach to considering development proposals and is in line

with the 2012 NPPF. Although the plan is being examined against the 2012 NPPF the wording in the 2019 NPPF in relation to sustainable development and decision taking is different. It is reasonable for the approach to sustainable development in the LP to be consistent and to ensure it will be effective in line with the 2019 NPPF. Therefore, **MM1** is necessary to refer to the policies which are the most important for determining applications. Wording relating to the objectives of for sustainable development has also been removed, as these are contained within the NPPF.

31. The Plan includes several policies relating to reducing the impact of development on climate change. This is consistent with the Vision and Objectives of the LP. The approach towards Sustainable Design and Construction is set out in Policy CC2. The general principles of the policy would apply to all forms of development and will be necessary to help minimise effects. There is justification supported by the evidence for applying Policy CC2 to all development within the Borough. Past developments in Reading have been able to achieve high Building Research Establishment Environmental Assessment Method (BREEAM) standards. The approach to BREEAM is consistent with national policy and will be effective subject to **MM2**. This is necessary to clarify that detail on the application of BREEAM will be provided through an update to the Sustainable Design and Construction Supplementary Planning Document (SPD).
32. Policy CC3 (Adaptation to Climate Change) additionally requires new development to demonstrate measures to adapt to climate change. To ensure flexibility, **MM3** alters the policy to incorporate the wording 'wherever possible' in relation to building orientation. Additional clarification is included within the supporting text for guidance to be provided in the Sustainable Design and Construction SPD.
33. Decentralised Energy is addressed in Policy CC4. In order for the Policy to be responsive to changes in technology, **MM4** removes references to Combined Heat and Power. The policy is also altered to ensure the correct size of development is referred to which is expected to meet the requirements. Consequential changes are also made to the supporting text, including a reference to the Sustainable Design and Construction Supplementary Planning Document (SPD), and to potential types of decentralised energy.
34. The requirement for financial contributions is set out in Policy CC9 (Securing Infrastructure). For the policy to be justified and consistent with the Community Infrastructure (CIL) Regulations and paragraph 204 of the NPPF, **MM5** removes references to payment of contributions towards monitoring of planning obligations as this is not necessary to make development acceptable.
35. The policy also includes a requirement for new employment development to provide mitigation measures in line with its impacts including affordable housing. It is acknowledged that in the past some employment development has made financial contributions towards affordable housing and this may have had some positive impact on the provision of affordable housing.

However, the requirement has not been tested in The Local Plan Viability Assessment (EV006) and therefore there is no viability evidence to support the imposition of this part of the policy. For the policy to be justified the wording relating to affordable housing is deleted by MM5. Consequential changes to the supporting text are also necessary.

## Conclusion

36. Subject to the MMs, the Cross-Cutting Policies in the LP are justified, effective and consistent with national policy.

### Issue 3 - Are the policies for the Built Environment justified, effective and consistent with national policy?

37. Policy EN1 (Protection and Enhancement of the Historic Environment) seeks to protect and where possible, enhance the designated heritage assets of the Borough. The approach would be effective subject to **MM6**. This is necessary to be consistent with national policy, and it provides more detail on how a decision maker should react to proposals specifically affecting listed buildings and historic parks and gardens.
38. The approach towards Areas of Archaeological Significance is set out in Policy EN2. For the policy to be consistent with national policy an additional reference to overriding public benefits is added through **MM7**.
39. The assessment of sites for Local Green Space and Public Open Space in Policy EN7 (Local Green Space and Public Open Space) is up to date, and the methodology used to assess sites is robust. Local Green Space has been identified in accordance with the NPPF. The inclusion of Public Open Space within the policy is also consistent with national policy. However, for the policy to be effective **MM8** is necessary to provide further explanation in the supporting text on the differences between Local Green Space and Public Open Space.
40. The wording in relation to biodiversity net gain in Policy EN12 (Biodiversity and the Green Network) is in accordance with the 2012 NPPF and would not be at odds with the 2019 NPPF. However, in order to be effective through **MM9**, the policy needs to refer to development that 'negatively' affects identified sites in the Green Network.
41. The requirements in Policy EN13 (Major Landscape Features and Areas of Outstanding Natural Beauty) are justified based on the evidence, and it will be effective including protecting the identified Major Landscape Features. However, so that the supporting text is consistent with the policy, **MM10** is necessary to clarify that a Landscape and Visual Impact Assessment is needed where the setting of an Area of Outstanding Natural Beauty would be affected.
42. The requirements of EN14 (Trees, Hedges and Woodlands) are sufficiently flexible and in accordance with the Framework where it relates to conserving and enhancing the natural environment. However, for the policy

to be effective **MM11** is necessary to amend the supporting text to refer to protection for irreplaceable Ancient Woodland and veteran trees, and to refer to the types of circumstances where off-site planting may be appropriate.

43. Air quality is a concern within the Borough, particularly relating to pollution levels linked to traffic congestion. Policy EN15 (Air Quality) seeks to ensure that detrimental impacts on air quality from new development are mitigated, and it takes account of potential cumulative impacts. The policy is justified and will be effective. This is subject to **MM12**, which is needed to the supporting text to add further clarification on the approach to ensuring high levels of air quality are present across the Borough and not just Air Quality Management Areas (AQMA). Additional changes are necessary for the policy to be effective in respect of additional guidance on the circumstances where an Air Quality Assessment (AQA) will be needed and provides guidance on material increases in congestion or HGVs.
44. The noise requirements set out in Policy EN17 (Noise Generating Equipment) refer to 10db (decibels) below measured background level which is based on principles established in Reading over several years. Its application will be effective subject to **MM13** which amends the wording from noise source 'rating' level to noise source 'specific' level.
45. Policy EN18 (Flooding and Drainage Systems) seeks to direct development to the areas with the lowest level of flood risk in the first instance. Much of Reading is at risk of flooding and the policy is justified. The sequential and exception tests for the LP allocations is contained within EV028, and this indicates that some sites within Flood Zone 1 have been rejected. This is explained in Section 4 and Appendix 2 of that document, and when read alongside the HEELA the approach is robust. Although the Strategic Flood Risk Assessment refers to previously developed land, the requirements of Policy EN18 and paragraph 4.2.98 is in accordance with the NPPF and the PPG. This will ensure that developers understand what is expected when proposing development. However, to ensure that the definition of Flood Zone 3b is properly applied, **MM14** to the supporting text is required. This adds a new paragraph that explains this.

## Conclusion

46. Subject to the MMs, the policies for the Built Environment in the LP are justified, effective and consistent with national policy.

## Issue 4 - Are the policies for employment justified, effective and consistent with national policy?

47. The employment floorspace provision is derived from the Central Berkshire Economic Development Needs Assessment (EV002). The requirements would generate the highest level of economic growth for the Borough. The full employment floorspace figure can be met in the area based on scope for intensification and a site-by-site analysis. The net increases set out in the

policy would also go some way to contributing to employment needs within the FEMA.

48. The evidence in the SHMA and the Economic Development Needs Assessment indicates that the needs for housing and employment as defined in the LP are currently well balanced. Policy EM1 (Provision of Employment Development) therefore indicates that development that would exceed the net increase would need to demonstrate that there would be no impacts on local housing including through affordable housing contributions. However, following on from MM5, the requirement for contributions towards affordable housing is also consequentially removed from Policy EM1 and the supporting text at paragraph 4.3.7 through **MM15**. For clarification on what is meant by 'residential', I have added the word 'development' after 'residential' in MM15. Subject to this MM and noting that the supporting text indicates that monitoring will inform whether these levels have been met, the provision of employment development and the requirements of the policy is justified.
49. Core Employment Areas are set out in Policy EM2 (Location of New Employment Development). These are the main existing areas for employment uses within the Borough. They were identified through the Reading Employment Area Analysis (EV010) and were assessed on several criteria relating to their suitability as employment areas and contribution to the economy. There is some objection to the methodology pointing to specific criteria and to including some plots of land within the Core Employment Areas where it is considered that alternative uses may be appropriate. However, the Employment Area Analysis indicates that the assessment relating to individual headings should not be considered in isolation. The methodology follows a clear rationale and allows a consistent approach to the definition of the Core Employment Areas. The identification of these sites is also consistent with paragraph 22 of the NPPF that seeks to avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that prospect. The policy is positive prepared by potentially allowing non-employment uses.
50. Policy EM3 relates to Loss of Employment Land and defines the circumstances where proposals resulting in the loss of employment land outside of the Core Employment Areas; these are justified. The policy also incorporates requirements relating to Core Employment Areas which allows in exceptional circumstances related alternative commercial use or uses ancillary to employment. The policy refers to the words long-term, but the flexibility of the policy itself is not incompatible with the wording of paragraph 22 of the NPPF where it relates to market signals and different land uses. The policy is not prescriptive about what alternative commercial uses are and is consistent with the flexible approach to Policy EM2. However, in order to be effective, **MM16** is necessary to ensure consistency between the supporting text and the policy requirements, to provide more clarity on how exceptional circumstances will be assessed and indicate how long-term vacancy is to be defined. Five years is a reasonable time frame considering that shorter time periods could reflect economic conditions that do not last.

## Conclusion

51. Subject to the MMs, the employment policies in the LP are justified, effective and consistent with national policy.

### **Issue 5 - Are the policies for Housing justified, effective and consistent with national policy?**

#### *Density*

52. Policy H2 (Density and Mix) sets out how densities of residential development will be determined. Indicative residential development capacities are shown separately for each site allocation. For the approach to be sufficiently flexible, **MM18** is necessary to explain that the capacity of each site may differ from the range set out in the allocation. The supporting text is also amended to reflect this, by reference to site allocations policies CR11-14, SR2-4, WR1-3 and ER1. Policy ER1 includes two sites allocated for student accommodation (ER1a and ER1e) and to ensure consistency on how the sites allocated in that area are considered, I have amended the supporting text to add the wording 'and bed spaces' in the first and second sentence of the modification to paragraph 4.4.6.
53. Policy H2 also seeks to secure self and custom build. For this element of the policy to be justified the wording is also amended through MM18 to consider viability where provision for self or custom build plots is considered appropriate, and to clarify that this requirement would not apply to student accommodation.

#### *Affordable Housing*

54. Policy H3 (Affordable Housing) requires sites of 10 or more homes to provide 30% of dwellings in the form of affordable housing. It also includes provision for a contribution towards affordable housing for site of 5-9 dwellings seeking on-site provision of 20%, and 1-4 dwellings contributing 10%. National policy established in the Written Ministerial Statement (WMS) dated 28 November 2014 states that a threshold of 11 or more units should apply. Regarding the Court of Appeal judgement, I have considered whether local circumstances may justify lower thresholds as an exception to national policy.
55. Around half of the OAN for Reading is for affordable housing need. This is not particularly unique to the Borough. Nevertheless, Reading is an urban authority with very few greenfield sites that are not affected by constraints such as flood risk and strategic open space. There are only two allocated greenfield sites, with 90% of development planned on previously developed land. Around 25% of the dwellings brought forward in Reading tend to be on the smaller sites.
56. The WMS seeks to tackle the disproportionate burden of developer contributions on small scale developers, custom and self-builders, and I have attached significant weight to this consideration. In 2012 the Council

adopted Policy DM6 of the Sites and Detailed Policies Document which sought contributions from small schemes. The amendments to this Policy were adopted in January 2015 and it now seeks to secure contributions from sites for between 1 and 14 dwellings, the requirements for sites of 1-4 dwellings and 5-9 dwellings being similar to Policy H3.

57. Historically, figures for completions on small windfall sites in the Borough have remained relatively stable, including for the years 2012-2018 ranging from 97 to 139. 2016-2017 was the lowest at 97, however 2014-2015 and 2017-2018 each resulted in completions of over 130 homes. This includes a significant proportion of schemes that made contributions in accordance with Policy DM6. There is some variation between sites of 1-4 dwellings and 5-9 dwellings with delivery on the smaller sites more consistent. However, taking account of the trends in Reading for small site completions as far back as 2002, the figures for both thresholds do not suggest an overall downward trend in houses coming forward on small sites. Nor is there any indication of a notable fall in the number of small sites coming forward as a result of introducing the lower affordable housing threshold in 2012 that would suggest delays to development or barriers for builders on these very small sites.
58. In addition, delivery of small sites within the Borough was relatively constant at points in the recession, suggesting the potential for delivery of affordable housing from smaller sites in the Borough even in challenging economic circumstances. The Local Plan Viability Assessment (EV006), Additional Information on Viability (EC030) and Additional Justification on Affordable Housing Policy H3 (EC043) indicates that the delivery of small schemes would be viable at the rates proposed.
59. The Council's assumptions indicate that small sites would continue to deliver around 120 homes per year, with contributions towards affordable homes totalling approximately £12 million over the plan period. The contributions would play an important role in the Council's Local Authority New Build Programme (LANB). Currently there are no registered providers proposing affordable housing programmes within the Borough. The Council's LANB programme is already delivering new homes with further phases planned in the next few years. On this basis, the delivery of off-site affordable housing units elsewhere in the Borough would be facilitated.
60. Policy H3, as submitted for examination, requires the provision of affordable homes on site for sites of 5-9 dwellings. However, this requirement is difficult to achieve in practical terms both for the developer and for any potential registered provider in managing a small site with potentially fragmented provision. Therefore, to be effective in contributing towards the number of affordable homes and to be justified, **MM19** is necessary to ensure that for sites of 5-9 dwellings provision of affordable housing should not be on site, and that contributions are the appropriate way of securing contributions.
61. Policy H3 acknowledges the potential for the effect of viability on any scheme for residential development. However, for the approach to small

schemes to be justified and to avoid a significant administrative burden, MM19 is also necessary to clarify that the level of information required to demonstrate viability issues for sites of fewer than 10 dwellings needs to be proportionate, and to be limited in scope and length. The MM indicates that further guidance on this would be provided in a revised Affordable Housing SPD.

62. Subject to MM19 and having carefully considered the issues there are a number of specific local circumstances in the case of Reading to support the proposed thresholds for sites of 1-4 and 5-9 dwellings and to justify a departure from national policy.
63. Policy H3 also sets out that the Council will seek an appropriate tenure and mix for affordable homes on sites where affordable housing is to be provided. **MM19** also explains the most up to date tenure split required by the policy, and that further detail will be provided through the Affordable Housing SPD.

#### *Other housing policies*

64. Policy H4 set out the requirements for Build to Rent Schemes. The requirements are justified subject to **MM20**. This is necessary to ensure that the minimum term for the rental market is not too onerous and consistent with what has been achieved in the Borough. The term is therefore changed from 30 to 20 years. The MM is also needed for flexibility as to how high-quality rental agreements will be achieved and refers to the potential for other measures as well as the Council's Rent with Confidence standards. The potential mix of units also now refers to Policy CR6 (Living in Central Reading) to ensure internal consistency. The supporting text also clarifies the consideration of viability and the role of the Affordable Housing SPD.
65. Policy H5 sets out standards for new housing. The standards are necessary in the light of the local evidence, technical standards and other regulatory requirements. However, in order for the policy to be justified **MM21** now refers to viability. It states how the requirement relating to wheelchair users applies to market homes and homes where the Council is responsible for allocating or nominating individuals. The requirements should also apply to C3 uses only which is now clarified in the supporting text. For the policy to be effective the supporting text refers to circumstances where homes are not designed to be carbon neutral and that an improvement in dwelling emission rates will be sought instead. Further clarification on wheelchair accessible dwellings is also necessary in the supporting text.

#### *Student Accommodation*

66. H12 (Student Accommodation) indicates that new accommodation will be provided on or adjacent to existing campuses or through extensions or reconfiguration of current student accommodation. The policy would not necessarily prevent sites for student accommodation coming forward elsewhere in the Borough, as proposals that clearly demonstrate a need that



cannot be met in accordance with the first part of the policy can be considered. Whilst there is some indication that purpose-built student accommodation could release market housing particularly from existing Houses in Multiple Occupation within the Borough, this needs to be balanced in the light of the potentially greater scope for competition for sites within the Borough for provision of general housing, and the need to meet the housing requirement in the LP. Moreover, the supporting text at paragraph 4.4.97 indicates that the future expansion of accommodation will be kept under review. Having regard to these factors, the approach to student accommodation in the Borough is therefore justified.

67. A Sustainability Appraisal (SA) of sites was undertaken alongside the production of the LP. The SA for the MM provides a guide to compare the implications of possible approaches to the policy against a range of environmental, social and economic considerations allowing all reasonable alternatives to be assessed on the same basis and thus meeting the Strategic Environmental Assessment requirements. It has been subject to the public consultation process. The policy has been drafted on an adequate process of SA.
68. However, to be effective **MM22** is necessary to explain the existing need for student accommodation, the approach to be taken towards addressing needs for the growth of the university and any subsequent need for student accommodation. It is also necessary to recognise the benefits of providing additional purpose-built student accommodation.
69. For clarity the MM also includes changes to the supporting text to explain the circumstances for identifying two sites (CR13a and ER1a) that are not in accordance with the general approach to student accommodation.

*Gypsy and Travellers, Travelling Showpeople and Houseboat Dwellers*

70. The LP is accompanied by the Reading Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment (EV016). In terms of Travelling Showpeople, an extension to an existing Travelling Showpeople's site at Scours Lane is capable of being expanded and does not require a specific site allocation. This would accommodate the requirement identified in the Accommodation Assessment and the approach is justified.
71. Based on those interviewed as part of the Accommodation Assessment this identified a need for 10-17 permanent pitches and a transit site for 5 pitches for Gypsy and Travellers within the Borough. The Council's Assessment of need in this regard is robust, and the methodology is being used within the HMA. However, there are no existing sites for Gypsy and Travellers within the Borough in terms of permanent accommodation which would be suitable for expansion, and also no long-term unauthorised sites that could be regularised. No private sites have been put forward for accommodation within the Borough. The caravan counts in 2017 recorded a zero.

72. A transit site at Cow Lane (WR4) was identified as a site allocation in the LP. However, **MM57** deletes this site allocation, as its inclusion within the LP is no longer justified as the site is used to support the requirements for Reading Festival and is not available. Based on the evidence, I am satisfied that the options for both permanent and transit sites within the Borough have been fully explored, including a very robust assessment of the Council's own land. A Duty to Co-operate request was sent to authorities within a 10km radius of the Borough, but no offer was made to accommodate those needs. On this basis, I consider that Reading is a Borough where a criteria-based policy would be justified and consistent with the Planning Policy for Traveller Sites document (2015).
73. Policy H13 (Provision for Gypsies and Travellers) is a criteria-based policy. However, Policy H13 is unsound as it is based on demonstrating a local need. In terms of reasonableness, the policy should not be overly onerous. Accordingly, **MM23** is necessary to remove the requirement to demonstrate an identified need, this would then ensure that the policy is consistent with national policy and make it more positive. **MM24** clarifies that in addition to permanent sites no transit sites have been identified, and that proposals will be assessed in line with the approach to be taken to providing sites for Gypsy and Traveller accommodation.

*Overall conclusions on housing policies*

74. Subject to the recommended MMs the policies in the LP will be effective in delivering the appropriate type of housing to meet the needs of the area and are justified and consistent with national policy.

**Issue 6 - Are the policies for Transport justified, effective and consistent with national policy?**

75. Alongside the LP a Local Plan Transport Modelling Report (EV005) assesses the cumulative impacts of development on the highway network. Policy TR1 (Achieving the Transport Strategy) amongst other things requires that development should make appropriate provisions for works and contributions. These measures would be effective in terms of mitigating transport impacts and reflects the overall approach to sustainable development, consistent with other policies in the LP. Subject to **MM25** which is necessary to the supporting text to be consistent with definition of major development elsewhere in the LP, Policy TR1 is justified.
76. Policy TR2 (Major Transport Projects) is based on the Council's most recent Local Transport Plan (OP005). The major transport projects identified in Policy TR2 are justified and deliverable with several projects underway. Policy TR2 seeks to safeguard land for these projects. However, **MM26** clarifies that land is safeguarded 'where necessary' as not all these projects require land for implementation. This is needed for effectiveness.
77. The supporting text for Policy TR2 acknowledges that the constraints of the Borough indicate that Park and Ride provision may have to be provided outside of the Borough boundaries. **MM27** is necessary to provide the most

up to date position on Park and Ride and to reflect that at the present no sites have been formally proposed.

## Conclusion

78. Subject to the recommended MMs the policies for transport within the Borough are justified, deliverable and consistent with national policy.

## Issue 7 - Are the policies for Retail, Leisure and Culture and Other Uses justified, deliverable and consistent with national policy?

### *Retail*

79. Policy RL2 makes provision for new retail and leisure facilities. The policy contains a requirement to undertake a sequential approach in accordance with the NPPF. The policy is justified as it would be consistent with national policy but subject to **MM28**, which indicates that sequential approach will also be applied to other defined centres as well as the Centre of Reading.

80. Policy RL3 (Vitality and Viability of Smaller Centres) sets out criteria to retain a strong element of retail in the core (Key Frontages) of defined smaller centres, through criterion a) and b). The approach to these smaller centres will be effective subject to **MM29**. This is necessary to introduce an additional criterion d) which provides flexibility where a Key Frontage has already or may change through redevelopment. Consequential changes are made to the supporting text. The inclusion of the words a 'strong retail character' is consistent with NPPF at paragraph 23, where it relates to providing customer choice and a diverse retail offer. The MM also clarifies the expectations in terms of long-term vacancy with the wording 'could be expected' that does not require units to have been vacant for that long but is included as a potential benchmark against which proposals would be assessed.

### *Other uses*

81. Policy OU1 (New and Existing Community Facilities) includes a requirement relating to additional development for further and higher education. In order for the policy to be positively prepared it is necessary through **MM30** to refer to those proposals where there is not a material increase in the need for student accommodation, it also clarifies that if additional accommodation is needed, this would be an 'appropriate' increase. Consequential changes are also made to the supporting text.

82. In order for Policy OU3 (Telecommunications) to be consistent with national and other LP policies in respect of the historic environment, it is necessary for the policy to refer to consideration of the significance of a heritage asset through **MM31**.

83. Policy OU4 (Advertisements) includes a set of criteria relating to proposals for advertisements. The policy will be effective, subject to **MM32** which is needed to provide further explanation of how the decision maker should

consider proposals for box fascia and projecting advertisements. The text also provides further clarification on illumination of advertisements and the approach to be taken towards heritage assets.

## Conclusion

84. Subject to the recommended MMs the policies in the LP relating to retail, leisure and other uses are justified, effective and consistent with national policy.

## Issue 8 - Are the strategies, policies and site allocations for each identified areas of Reading justified, effective and consistent with national policy?

### Central Reading

85. The strategy for Central Reading is based on three central elements. First is movement and transport which will be achieved by increasing connectivity and breaking down physical barriers, the strategy will be effective in this regard. Secondly, land use will focus on the vitality, viability and activity in the central area, which is vital to the Centre's role in the growth of the Borough. Thirdly, the approach to urban design will be through continuing historic patterns of development and reinforcing the character of the area and providing guidance on the approach to tall buildings. This will ensure that the area is developed in a manner appropriate to the context and importance of the area.
86. The amount of development planned is based on the HELAA and will accommodate a significant proportion of dwellings (50% of the overall total) and around 63% of office accommodation and 77% of retail floorspace. The area contains three Major Opportunity Areas with each one having overall development criteria and specific site allocations. Other sites for development are also identified. The strategy is a continuation of the partly implemented Central Reading Area Action Plan, and the overall approach for the Central Reading strategy is justified.
87. The approach to office development and other town centre uses within Policy CR1 (Definition of Central Reading) is also consistent with national policy and is justified, subject to **MM33**. This is necessary to provide clarity to the wording of the policy that the Central Area boundary marks the edge of the town centre other than where specified, and to ensure that the area relating to Policy CR1 is properly defined and identified.
88. Bullet v of Policy CR3 (Public Realm in Central Reading) refers to conserving and enhancing the historic environment. However, for the policy to be effective and consistent with other LP policies, **MM34** is necessary to ensure that the significance of heritage assets is considered by the decision maker.
89. For Policy CR4 (Leisure, Culture and Tourism in Central Reading) to be effective and justified, **MM35** removes the wording that related to non-

regionally significant tourist attractions as this reference was linked to the now revoked South East Plan and is therefore no longer applicable.

90. Policy CR10 (Tall Buildings) sets out how a decision maker should determine planning applications for proposals for tall buildings within the Central Reading area. The approach includes consideration of such matters as townscape and views amongst others. A Tall Buildings Strategy Update Note (2018) concluded that the strategy remained relevant, and I consider it is justified. The areas of potential for tall buildings set out in the Policy (CR10a, CR10b and CR10c) are suitably defined and will be effective in accommodating tall buildings that are appropriate to the characteristics and objectives of each area. However, **MM36** is necessary to ensure consistency with national and other LP policies relating to the historic environment.

#### Station/River Major Opportunity Area

91. The requirements of Policy CR11 (Station/River Major Opportunity Area) support the intention of extending this area and providing a mixed-use destination. However, **MM41** inserts additional wording in the supporting text at paragraph 5.4.12 of the LP to ensure that any proposals in this area take account of any site partly located within Flood Zone 3. This is necessary for consistency with national policy and other LP policies in relation to flood risk.
92. The potential for high density development for site allocation Policy CR11a (Friar Street & Station Road), CR11b (Greyfriars Road Corner) and CR11c (Station Hill and Friars Walk) has been considered. The allocations are consistent with the overall approach to the Central Reading area and the indicative capacities are justified subject to **MM37**, **MM38** and **MM39** that are necessary to clarify that no significant net gains in residential, office, retail and leisure development are assumed. Planning applications would be determined in line with MM18 to allow flexibility should capacities on these sites increase or decrease.
93. Taking account of the allocation for site CR11g (Riverside) for mainly residential development, **MM40** is necessary to clarify that acceptable office development should be related to leisure uses. This type of office use would be justified even taking account of the site's location within the Office Core of Central Reading. MM40 is also necessary for effectiveness to indicate where development should be located in relation to the top of the river bank, and that mitigation in relation to flood risk should be taken into account.

#### West Side Major Opportunity Area

94. Policy CR12a (Cattle Market) allocates land for residential and retail development. In order for the policy to be effective, and to make it clear to a decision maker to know how to react to the proposals in terms of design and layout, **MM42** is necessary to indicate that these matters should reflect the grid layout and built form of the centre of Reading.

95. The allocation of land for residential development in Policy CR12b (Great Knollys Street and Weldale Street) is effective subject to **MM43** that clarifies that the replacement of as many of the small business units as possible is a requirement, and to reflect the increased potential capacity of residential units.
96. Policy CR12e (Hosier Street) is allocated for residential, retail and leisure development. The policy requires the replacement of the Hexagon theatre. The approach towards the replacement theatre is necessary to ensure this type of facility is retained and it will be effective subject to **MM44** that indicates that this is expected to be in the same area. Consequential changes are also made to the accompanying text set out in paragraph 5.4.17. This ensures consistency with the policy, and the MM also specifies that any schemes for a proposed replacement will require liaison with the Theatres Trust.

#### East Side Major Opportunity Area

97. Policy CR13a (Reading Prison) is allocated for residential development and other uses. The policy is sufficiently flexible to allow consideration of a variety of uses bearing in mind the complexity and constraints of the site and its historical significance. However, for the policy to be effective in relation to the historic environment **MM45** is necessary to ensure that any use for the former prison should be compatible with its heritage as a former prison. The MM also contains changes to the supporting text to clarify that the site's potential use for student accommodation is justified in this case, which would otherwise conflict with Policy H12 of the LP.
98. The requirements for the site allocation Policy CR13b (Forbury Retail Park) for residential development are deliverable and based on robust evidence. This is subject to **MM46**, which is necessary to be effective in respect of the natural environment. The MM refers to a buffer zone from the top of the canal bank to properly reflect the site's significance for wildlife.
99. Policy CR13c (Kenavon Drive & Forbury Business Park) is allocated for residential development. The policy is effective subject to **MM47**, which is necessary to reflect the most up-to-date position on potential capacity.
100. Policy CR13d (Gas Holder) is allocated for residential development. The indicative potential of dwellings of 46-70 is justified having regard to both the characteristics of the site and the 'pattern book approach' in the HELAA. Nevertheless, planning applications would be determined in line with MM18 to allow flexibility should it be demonstrated that capacities on this site are capable of being increased. The requirements of Policy CR13d are effective subject to **MM48**. This is needed to ensure that development should enhance the character and allow public access to the Kennet river and not the mouth of the river as originally described. It also ensures that development would be set back from the top of the bank of the river to reflect the wildlife significance of the river.

## Other Sites for Development in Central Reading

101. Policy CR14m (Caversham Lock Island and Caversham Water) is identified as being suitable for leisure use. For it to be clear to decision makers to know how to react to the requirements of the policy, **MM49** is necessary to be effective. This will allow for proposals that include pedestrian access and/or hydropower to be acceptable.
102. Policy CR16 (Area to the North of Friar Street and East of Station Road) seeks to ensure that development in this area takes place within its context of making a significant contribution to the townscape of Central Reading. The requirements of the policy are justified and will be effective subject to **MM51**. This clarifies that the retail units of Harris Arcade and the overall frontages will be maintained rather than conserved. The MM is also necessary to be effective in relation to the potential for conversion, and that any proposals for overall redevelopment that detrimentally affect the overall character will not be supported.

## South Reading

103. The strategy for South Reading is focused on key principles. These include it being a location for considerable residential and employment development with a focus on development revitalising and regenerating the South Reading area. The amount of employment floorspace that the area can accommodate is a significant proportion of the total requirement within Reading, and in terms of residential development this would be 24% of the total. The provision in this area is appropriate given its characteristics. Enhanced transport connections will also play a vital role in improving access to this and other areas for existing and future communities. The area is divided into three Major Opportunity Areas with specific aims, criteria and site allocations for each one. Other sites for development are also allocated for a variety of uses. Considering the context and evidence for South Reading the overall strategy for this area is effective and justified.

### Island Road Major Opportunity Area

104. This area will provide a large amount of the industrial and warehouse uses in South Reading. Site allocation Policy SR1a (Former Landfill, Island Road) has several site requirements. These are justified subject to **MM52**. This is necessary to be effective for the natural environment and to ensure the location of development is located away from the top of the river bank. The MM is also needed to reflect the different ownerships of the site but that access to the site should be considered as a whole.

## Other Sites for Development in South Reading

105. Policy SR4e (Part of Former Berkshire Brewery Site) has an existing planning permission for offices and the site was cleared in 2010. It is allocated for industrial and warehousing uses. The allocation is justified as the evidence indicates that the office development is unlikely to be built out, and in any event the evidence indicates that loss of this site would not

necessarily prevent employment needs in the area being met. To ensure consistency with other policies in the LP, **MM53** amends Policy SR4e to include a reference to the top of the bank of the watercourse to ensure the ecology of the watercourse is protected.

106. Transport modes and infrastructure needs in this area would be affected by the opportunity for a significant new garden village within Wokingham Borough and West Berkshire District (as set out in the West of Berkshire Spatial Planning Framework). This area around Grazeley is likely to be associated with any major development that may come forward in that area which is identified in plans of the adjoining Councils. A small part of land within Reading would be affected by these proposals. Therefore, Policy SR4f (Land South West of Junction 11 of the M4) safeguards land for uses associated with major development at Grazeley. The policy addresses this long-term potential in an effective manner and is justified. However, to ensure consistency with other policies in the LP, **MM53** also amends Policy SR4f to include a reference to the top of the bank of the watercourse.
107. Policy SR5 (Leisure and Recreation use of the Kennetside Area) seeks to support proposals for low-intensity leisure and recreational uses. There is the potential for proposals to affect the operation of Thames Water Treatment Works. Therefore, **MM55** is necessary for the policy to be effective in respect of the operation of the works. The consequential changes to the supporting text in relation to needing discussions with Thames Water are also necessary.

### **West Reading and Tilehurst**

108. The Strategy for West Reading and Tilehurst is based on some potential for additional development (around 15% of the total housing requirement), retaining employment areas for the most part, and ensuring that district and local centres continue to serve local communities. This is an effective approach to the area. There are no Major Opportunity Areas, but there several site allocations spread across the area which are planned to deliver a mix of regeneration and redevelopment schemes including education and retail, as well as residential development. Having regard to the area's primarily residential nature, the strategy for West Reading and Tilehurst is justified.

#### Site Allocations

109. Policy WR2 (Park Lane Primary School, The Laurels and Downing Road) seeks to combine the operations of Park Lane Primary School on to a single site at The Laurels. The implementation of this allocation including some residential development will achieve this. However, for the policy to be effective **MM56** is necessary to include a reference to early years provision to be provided alongside the existing policy requirements for a library and clinic at The Laurels.
110. WR3s (Land at Kentwood Hill) and WR3t (Land at Armour Hill) are allocated for residential development. Some of the land would be retained in



recreation and allotment use, as well as a portion of the site which has considerable biodiversity value. The sites are within a residential area although their character is one of being largely undeveloped. Nevertheless, development of the rest of the two sites would be subject to a significant number of criteria. These amongst other matters include the requirement to demonstrate how schemes fit within a comprehensive approach incorporating the allocated sites as well as the allotments and recreation ground. It would also require assessment and mitigation of local junction impacts, avoiding adverse impacts on the West Reading Wooded Ridgeline major landscape feature and on biodiversity. With the requirements as set out, these would be effective in mitigating any adverse impacts, and the allocation of the two sites is therefore justified.

### **Caversham and Emmer Green**

111. The strategy for Caversham and Emmer Green would accommodate approximately 5% of the total requirement in the Borough. It is an area with low potential for development with flooding constraints and most of the greenfield land is either important for recreation, landscape and historical value. In addition, transport, education and healthcare requirements also have an impact on the ability for the area to accommodate development. Some of the issues such as the crossing of the Thames and education would be addressed through joint working with other authorities. One of the allocated sites would go some way to addressing healthcare site CA1b (Part of Reading Golf Club, Kidmore End Road). The strategy for the area acknowledges the constraints and issues, and only seeks to allocate sites where development and change would be appropriate. On this basis, the strategy for Caversham and Emmer Green is positively prepared and justified.

#### Site Allocations

112. Policy CA1a (Reading University Boat Club, Thames Promenade) is allocated for residential development. The criteria to be met for the development are justified. However, **MM58** is necessary for effectiveness and to provide greater flexibility in respect of the any potential loss of the existing boathouse.

113. Policy CA1b (Part of Reading Golf Club, Kidmore End Road) is allocated for residential development and a replacement clubhouse. A large part of the golf course is located within South Oxfordshire. Although the Golf Club indicated that the golf facilities may be located elsewhere, discussions with South Oxfordshire are still on-going in terms of retaining a 9-hole golf course. For the residential development to be justified, **MM59** is necessary to secure the provision of golf on the remainder of the golf club site. Consequential changes are also necessary to the supporting text. This includes a legal agreement which would be necessary in planning terms to ensure the golf offer is secured, provide suitable access, and the clubhouse before residential development.

114. The requirement for a replacement clubhouse is necessary to help ensure the relationship with the remaining land and site CA1b is retained, and for it to be consistent with Policy RL6 (Protection of Leisure Facilities and Public Houses) of the LP. However, it would not be justified to specify the size of the clubhouse, it would depend on the nature of any future planning application. The policy therefore allows flexibility for it to be accommodated at an appropriate location and format within the site. To be effective, the criteria does not need to specify that this would be a permanent facility.
115. Taking account of the identified lack of healthcare in the area, to be effective the MM also refers to the need include healthcare provision as part of the scheme. The type of healthcare provision and the amount of open space do not need to be specified as this would be assessed in line with other policies in the LP at the time of any planning application. The MM also confirms that suitable roads should be used to access the area to be retained for golf, that traffic impacts on Tanners Lane should also be mitigated. These would also be determined in accordance with any planning application and LP policies including TR1 and TR3. The wording of bullet (4) does not limit consideration of traffic implications to Kidmore End Road and Tanners Lane. However, it is necessary to specify that parking requirements should be met on site to avoid exacerbating parking issues on existing streets.
116. This site is planned to be delivered in the latter part of the plan period from 2026 onwards, this is necessary to be consistent with the strategy for Caversham and Emmer Green and the wider Spatial Strategy. Subject to the MM, the allocation of residential development at site CA1b is justified.
117. Policy CA1d (Rear of 200-214 Henley Road, 12-24 Hallows Road & 7 & 8 Copse Avenue) is allocated for residential development. For the site requirements to be justified, **MM60** clarifies the location of a green link, and that the need to address air quality impacts are only related to the southern portion of the site.
118. For Policy CA1f (Rear of 1 & 3 Woodcote Road and 21 St Peter's Hill) to be consistent with national policy relating to the historic environment and to be effective, **MM61** clarifies that archaeological assessment work should inform the development.
119. Policy CA2 (Caversham Park) includes Grade II listed structures and historic garden. The policy seeks to conserve these assets and is focused on the conversion of the main building. For the allocation to be justified and effective the policy is amended through **MM62** to have regard to other suitable use compatible with the site's heritage, and that reinstatement of historic public footpaths may be appropriate. It is not necessary to refer to the internal features of the buildings as these would be considered as part of future use of the site, in line with other policies of the LP.
120. The policy does not allocate land for additional development. Nevertheless, it is sufficiently flexible to allow consideration of limited development on previously developed land at the planning application stage, subject to a set

of criteria. However, for the criteria to be effective the MM also clarifies that development should not detract from the character and appearance of the landscape or negatively affect significant trees. Having regard to the site's importance to the historic environment, the policy is justified subject to the MM.

## East Reading

121. The strategy for East Reading would accommodate around 7% of the total amount of residential development. The area includes the Royal Berkshire Hospital and the University of Reading, and the continued development of the Whiteknights Campus and the hospital is supported but the LP acknowledges the potential tensions with the surrounding residential areas. In order for the strategy to be consistent with the approach to the University in the rest of the LP, **MM63** amends the supporting text to indicate that the Council considers the first priority for any increase in purpose-built student accommodation should be on the existing sites. Subject to this MM, the strategy for East Reading is justified.

## Site Allocations

122. Policy ER1c (Land Rear of 8-26 Redlands Road) is allocated for residential development. However, **MM64** is necessary to reflect the potential for student accommodation and university uses and the amount of residential development is increased.

123. Site allocation ER1h (Arthur Hill Swimming Pool) is allocated for residential development, which seeks to retain the existing frontage of the building where possible. The site is a locally listed building and its allocation for residential development would be consistent with Policy EN4 relating to locally important heritage assets. Policy RL6 relates to the protection of leisure facilities, however considering the allocation of land at Palmer Park (Site ER1j) which includes a new swimming pool, the allocation for residential development at ER1h is justified.

124. Policy ER2 (Whiteknights Campus, University of Reading) acknowledges the strategic importance of the campus. The policy does not specify levels of student accommodation or other potential types of development, instead the policy provides a set of criteria. Given the nature of the University which will continue to grow and expand this approach is justified. The requirements for Policies ER2 would be effective subject to **MM65**. This is necessary to ensure that the policy is consistent with Policy H12 and to reflect that where development is proposed that any material need for additional student accommodation is focused on existing and planned student accommodation. The wording now relates to an 'appropriate' increase rather than corresponding and is therefore now more flexible. The MM includes changes to the supporting text which reflects the growth of student numbers. Subject to the MM, the policy accords with the strategy for the area and is justified.

## General site considerations

125. The requirements of each site allocation are set out within each relevant policy. Paragraph 5.4.34 and Paragraphs 6.3.15, 7.3.14, 8.3.3 and 9.3.3 refer to significant issues that may need to be addressed for sites. In order for the LP to be effective when considering planning applications for site allocations within the specific areas of Reading it is necessary to amend these paragraphs through **MM50** and **MM54**. The supporting text is amended to indicate that the significant issues are based on other LP policies and that more detail is provided in those.

## Conclusion

126. Subject to the MMs, the strategies for Central Reading, South Reading, West Reading and Tilehurst, Caversham and Emmer Green, and East Reading are effective, justified and consistent with national policy. The site allocations are effective and justified subject to the MMs.

## Public Sector Equality Duty

127. In arriving at my conclusions on the issues I have had regard to the Public Sector Equality Duty contained in the Equality Act 2010 and the Equality Impact Assessment incorporated in the Sustainability Appraisal. In particular, in relation to the protected characteristics of vulnerable, older and young people, gypsies and travellers and people with disabilities, the policies will have a generally positive impact.

## Assessment of Legal Compliance

128. My examination of the legal compliance of the Plan is summarised below. The LP complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

### *Habitat Regulations Assessment*

129. The Sustainability Appraisal incorporates a screening assessment of European designated habitat sites, Special Protection Areas (SPA) and Special Areas of Conservation (SAC). Most of the sites were screened out due to the distance from the relevant SPA/SACs, including being outside of the 7km zone of influence of the Thames Basin Heaths SPA (TBHSPA). Sites in the LP that lie within the 7km zone are allocated for commercial use and would not have an impact on recreational disturbance on the TBHSPA. Therefore, there are no pathways for the policies/allocations in the plan that would cause significant effects on European sites and their designated features, and Natural England have not raised any objections to the LP in respect of European sites.

### *Sustainability Appraisal*

130. Sustainability Appraisal has been carried out on the LP and the MMs and has been adequate.

### *Local Development Scheme*

131. The LP has been prepared in accordance with the Council's Local Development Scheme.

### *Statement of Community Involvement*

132. Consultation on the LP and the MMs was carried out in compliance with the Council's Statement of Community Involvement.

### *Climate Change*

133. The Sustainability Appraisal notes that with regard to climate change the policy approach seeks to mitigate the impacts of development that would be located in the floodplain or affect air quality. In Reading, these have relevance given the planned level of economic and housing growth, and constraints of the Borough. The approach towards climate change is clearly seen through policies CC2, CC3, CC4, CC5 relating to sustainable design, climate change adaptation, decentralised energy and waste minimisation and EN15 and EN18 relating to air quality and flood risk respectively. Other aspects of the plan including site selection, green infrastructure and sustainable transport have also been influenced by the approach towards climate change.

## **Overall Conclusion and Recommendation**

133. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

134. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*Louise Gibbons*

Inspector

This report is accompanied by an Appendix containing the Main Modifications.