

Policy	Blew Burton Comments	Applicant Response
Reading Borough Local Plan (Adopted November 2019. Submission Draft Partial Update May 2025). Policy CC2: Sustainable Design and Construction		
Non-residential - net-zero	Under emerging policy the energy strategy should target net-zero.	The currently adopted RBC planning policy is designed around meeting the former 'net zero' targets. The application is committed to meeting these requirements. The applicant acknowledges that the Draft Partial Update (May 2025) is currently undergoing examination. However this document is not yet adopted and does not form part of the development plan and is therefore not an absolute requirement for proposals considered at this stage. This is particularly relevant with the draft National Planning Policy Framework clause 'PM13: Setting Standards' setting out that planning authorities should not seek to set quantitative standards relating to energy and carbon emissions. Emerging policy will require that developments be assessed for their Energy Use intensity (EUI) using TM54 modelling, which requires a significant amount of detail to complete. TM54 modelling ideally requires that the end use and operator of a commercial building be known, to allow for occupancy and usage patterns to be identified, such as operating hours, the nature of the space (e.g. a cafe versus small retail), and how building users interact with heating, cooling, and lighting controls. This level of detail is not appropriate for an outline application. Due to the above factors, it is not proposed that this outline application be amended to capture emerging policies at this time. A detailed sustainability statement will be provided with the reserved matters applications and will consider the viability of addressing the emerging policy targets.
Non-residential - renewable electricity generation (regulated and unregulated)	Under emerging policy the energy strategy should address renewable energy generation.	This may be achievable for the commercial spaces if energy intensity is sufficiently low, which will be set out in a detailed sustainability statement at reserved matters stage.
Non-residential - site average space heating demand of 15-20 kWh/m2/year	Under emerging policy the energy strategy should address space heating demand.	This is challenging to meet due to the less efficient form factor of commercial buildings, which are typically flat and spread over a large footprint - this increases heating demand. It is proposed that this could be reviewed at reserved matters stage.
Non-residential - site average total energy demand of 70kWh/m2/yr	Under emerging policy the energy strategy should address energy demand.	This entirely depends on the use of the commercial spaces, and cannot be determined until end users are known. It is not proposed that this be addressed at this stage.
Non-residential - No unit shall exceed total energy demand of 90kWh/m2/yr	Under emerging policy the energy strategy should address energy demand.	As above, this cannot be agreed to at this stage until end users are known.
Post occupation monitoring	Under emerging policy the energy strategy should address post occupation monitoring.	Noting previous comments regarding emerging policy, this could be achieved but would require future tenants to be responsible for monitoring this. Given that the application is outline it is not appropriate for this to be confirmed at this stage nor is there any adopted policy requirements for such monitoring.
Non-residential - water consumption (fittings approach)	Non-residential water use should be addressed.	This will be captured as part of the BREEAM assessment process.
Justification for demolition	Demolition should be justified.	The Forbury Retail Park comprises an existing retail warehouse terrace and forms part of wider Site allocation CR13b which is allocated for 1,230 - 1,840 dwellings. Therefore the demolition and redevelopment of the Site is directly supported by the Local Plan and demolition of the existing buildings is justified by virtue of the site allocation. It is noted that a pre-demolition audit will likely be required by the BREEAM assessment process, and as such, opportunities to reuse or recycle demolition materials can be explored to minimise the impact of demolition.
95% of construction waste diverted from landfill	Targets should be set for waste diversion from landfill.	This is anticipated to be addressed as part of the BREEAM assessment.
Reading Borough Local Plan (Adopted November 2019. Submission Draft Partial Update May 2025). Policy CC3: Adaptation to Climate Change		
Future connection	Taking into account the new wording of Policy CC4 we would recommend a pre-commencement condition for the energy strategy to fully explore the possibility of connection to the heat network.	This can be explored. The proposal is for an on-site communal heating network, which could be designed to be compatible with future district-wide networks if there is a reasonable prospect of these becoming available at the time submission of reserved matters. This would, however, result in superfluous heating plant within the development - if district heat networks are not available within suitable timescales towards the end of the construction programme, the development should be able to retain the proposed on-site network.

Reading Borough Local Plan (Adopted November 2019. Submission Draft Partial Update May 2025). Policy H5: Standards for New Housing.

Residential water efficiency - water neutrality where possible	The applicant should target water neutrality initially.	It is not anticipated to be possible to deliver water neutrality on-site. The proposals are to replace the existing low-density Forbury Retail Park, with a development of up to 700no dwellings and up to 3,000m2 of commercial areas. Potable water demand from residential uses is anticipated to drastically exceed the existing site's water demand. The proposed scale and form of development are consistent with Site Allocation CR13b, which supports the delivery of approximately 1,230–1,840 dwellings across the site and adjoining land. However, the uplift in built form compared to the existing retail warehouse use significantly constrains the ability to achieve water neutrality through reasonable and proportionate measures.In this context, and given that the principle of redevelopment at a higher density is clearly established and supported by the adopted Local Plan, it is considered that the strict application of a water neutrality requirement is not justified in this instance.
New build housing - Net zero	Under emerging policy the energy strategy should target net-zero.	The currently adopted RBC planning policy is designed around meeting the former 'net zero' targets. The application is committed to meeting these requirements. The applicant acknowledges that the Draft Partial Update (May 2025) is currently undergoing examination. However this document is not yet adopted and does not form part of the development plan and is therefore not an absolute requirement for proposals considered at this stage. This is particularly relevant with the draft National Planning Policy Framework clause 'PM13: Setting Standards' setting out that planning authorities should not seek to set quantitative standards relating to energy and carbon emissions. Emerging policy will require that developments be assessed for their Energy Use intensity (EUI) using TM54 methodology and PHPP modelling, which requires a significant amount of detail to complete. PHPP requires detailed layouts and window opening dimensions, as well as a high level of detail relating to ventilation ductwork, lighting controls, and the use of appliances within a home. This level of detail is not appropriate for an outline application. Due to the above factors, it is not proposed that this outline application be amended to capture emerging policies at this time. A detailed sustainability statement will be provided with the reserved matters applications and will consider the viability of addressing the emerging policy targets.
Site average space heating demand of 15-20kWh/m2/annum	This should be demonstrated in an updated energy strategy required under a pre-commencement condition.	This energy efficiency standard is noted, and could be explored in a revised energy strategy as part of the reserved matters application.
Site average of total energy demand less than 35kWh/m2/annum	The should be explored in an updated energy strategy required under a pre-commencement condition.	This is particularly challenging to achieve, but could be explored in a revised energy strategy as part of the reserved matters application.
No single dwelling unit to have a total energy demand in excess of 60kWh/m2/annum	This should be demonstrated in an updated energy strategy required under a pre-commencement condition.	This is exceptionally challenging to demonstrate for a development of this scale, if required to assess this metric using PHPP modelling. PHPP modelling would typically cover each block as a single building, but is not appropriate for modelling individual apartments. It is therefore proposed that this could be demonstrated using SAP methodology, with SAP guidance on calculating unregulated energy use.
On-site renewable energy generation to match total energy use over the course of the year, with a preference for roof mounted solar PV	The should be explored in an updated energy strategy required under a pre-commencement condition.	This will not be possible. The development consists of high-rise, high-density apartment blocks with limited roof space. Façade-mounted PV is likely to present an unacceptable fire risk.
Post occupation monitoring	Under emerging policy the energy strategy should address post occupation monitoring.	Noting previous comments regarding emerging policy, this could be achieved but would require the future owner(s) of the site to be responsible for delivering this.
Wheelchair user dwellings - 10%	Under emerging policy 10% of dwellings should meet M4(3).	The outline application is in line with current RBC planning policies. The feasibility of achieving 10% M4(3) compliance will be reviewed at reserved matters stage.