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Mr Jonathan Markwell
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21 September 2026

Dear Jonathan,

FORBURY RETAIL PARK, READING, RG1 3HS
NPPF 2026 ADDENDUM NOTE FOR PLANNING APPLICATION REF. PL/25/1706

This note has been prepared to update the Planning Statement submitted as part of the outline application for the redevelopment of Forbury Retail Park, Reading (LPA Ref. PL/25/1706). The description of development is as follows:

“Outline application with all matters reserved with the exception of access, for site redevelopment involving the demolition of all existing structures & a residential-led mixed use proposal for up to 700 residential units (Class C3) & up to 3,000 sqm (GEA) of commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, open spaces, hard & soft landscaping & sewer works, partial basement excavation, up to 130 basement level car parking spaces, up to 53 separate car parking spaces for Class E uses, up to 600 cycle parking spaces & servicing facilities. This application is accompanied by an Environmental Statement.”

The Planning Statement considered the National Planning Policy Framework (NPPF) as revised in December 2024, and amended in February 2025. Since submission of the Application on 26 November 2025 (and subsequently validated on 27 January 2026), a new NPPF was published on 17 August 2026.

The purpose of this Addendum Note is to review the relevant changes introduced by the August 2026 NPPF and assess whether these changes are relevant to the planning considerations set out in the Planning Statement.

As set out below, a number of new policies within the updated NPPF strengthen the case for redevelopment on the Site, encouraging increased densities in accessible locations, and reinforce the conclusions reached within the submitted Planning Statement.

OVERVIEW

The Site comprises previously developed land within Reading's urban area and forms part of the allocated CR13b Forbury Retail Park site. The application proposals would deliver up to 700 dwellings together with up

to 3,000 sq. m. of Class E floorspace, in a highly accessible location approximately 490 metres east of Reading Station, as shown in Figure 1 below.

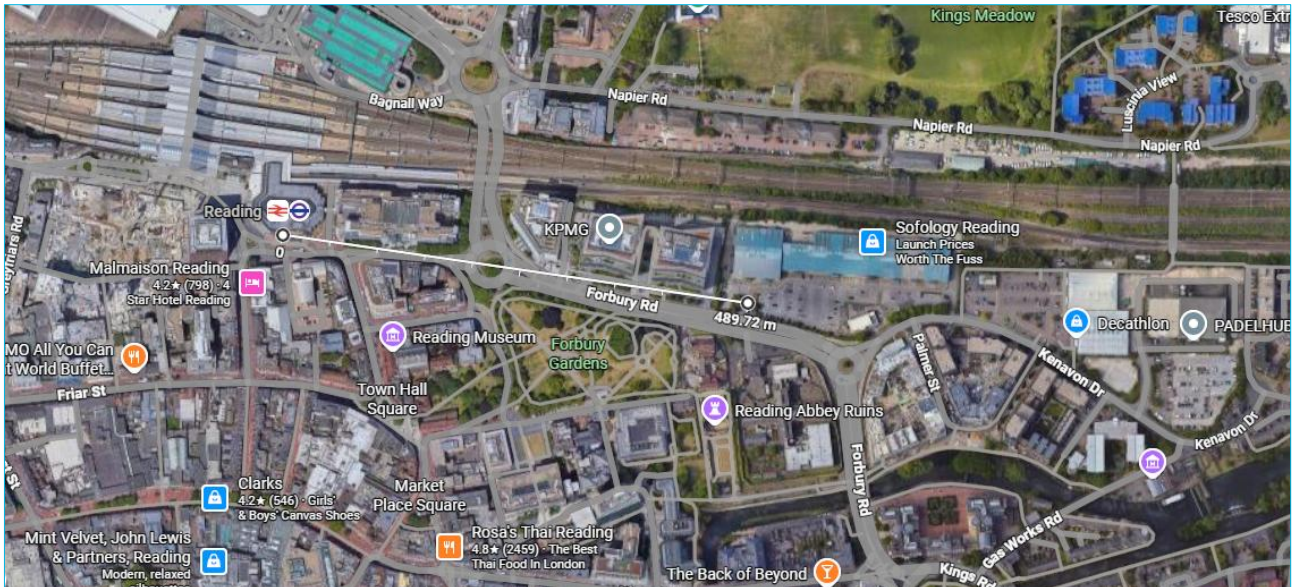


Figure 1: Google Maps showing 489 metre distance from entrance to Reading Train Station to western entrance to Forbury Retail Park

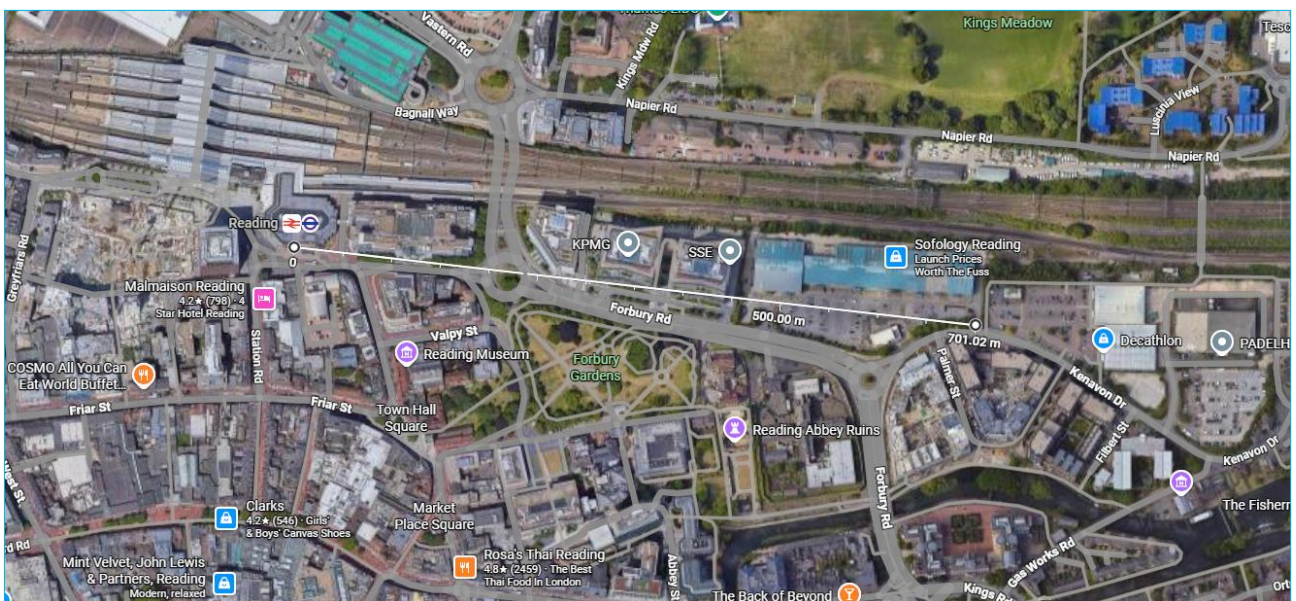


Figure 2: Google Maps showing 701 metre distance from entrance to Reading Train Station to eastern entrance to Forbury Retail Park

The Government has published a new NPPF, following consultation between December 2025 and March 2026. This includes stronger in-principle support for development, explicit support for housing close to well-connected stations, minimum density expectations around stations, new accessibility requirements and a more proportionate approach to decision-making. The August 2026 NPPF introduces a new policy structure but continues to support:

- Delivery of new homes;
- Regeneration and intensification of brownfield sites;
- Development in accessible locations;
- Optimisation of land use;
- Town centre regeneration; and
- Higher density development around well-connected public transport nodes.

The Proposed Development aligns strongly with these objectives.

RELEVANT POLICIES INTRODUCED BY THE AUGUST 2026 NPPF

The 2026 NPPF introduces Policy DM3, which relates to the determination of development proposals. In particular, Policy DM3 requires local planning authorities to:

- “a. Work with the applicant in a positive and proactive manner, where necessary seeking solutions to problems arising from initial proposals, to enable a timely decision;*
- b. Take a proportionate approach to the consideration of the planning matters raised by the proposals, in a way that reflects their scale, complexity and potential impact;*
- c. Take account of planning matters raised during any pre-application engagement, including any positive responses to this engagement, as well as representations on the proposals;*
- d. Consult statutory or internal consultees only where necessary to do so. Decisions on development proposals should not be delayed in order to secure advice from a statutory or internal consultee beyond their statutory deadlines unless there is insufficient information to make the decision, there are public safety risks from proceeding without advice, or more detailed advice may enable an approval rather than refusal;*
- e. Consider whether otherwise unacceptable development proposals could be made acceptable through the use of planning conditions or planning obligations;*
- f. Not to refuse applications for development which clearly should be approved, having regard to their accordance with the development plan, the policies in this Framework and any other material considerations.”*

The final part of DM3 (1f) is important as it is not a development management test. Instead, it sets an expectation that local planning authorities should grant planning permission where the planning balance supports approval. Part (1e) then recommends the use of conditions or obligations to make proposals acceptable than might otherwise have been unacceptable. These policies reinforce a positive approach to the determination of planning applications, where decision makers are expected to consider whether any identified issues can be appropriately addressed through conditions, obligations, or other mitigation before contemplating refusal. The policy therefore provides additional support for major brownfield regeneration proposals, such as the redevelopment of Forbury Retail Park, where detailed matters can often be addressed through the application process and subsequent reserved matters submissions.

Policy S4: Principle of Development within Settlements

Policy S4 establishes a new national decision-making policy for development proposal within settlements. Policy S4(1) states that:

“development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.”

The Site is located within the urban area of Reading and forms part of the allocated CR13B Forbury Retail Park Site. In the adopted local plan Allocation CR13B includes the Site, parts of the retail park immediately to the east and the recently constructed Huntley Wharf, comprising a total of 6.99 ha, which is allocated for 1,230 – 1,840 dwellings. The application Site is 2.94 ha, which when calculated on a pro rata basis, the policy allocation indicates would be suitable for approximately 517 – 774 dwellings. In the emerging draft local plan the updated Policy CR13B acknowledges the construction of Huntley Wharf and excludes this from the allocation, which has been revised to include the application Site and the retail warehousing immediately to the east, comprising a total area of 3.98 ha. Reading Borough Council identify this site to be suitable for accommodating 870 – 1,300 dwellings.

The amendments to the Site allocation affords the Site an increased allocation of density of dwellings per hectare. Which on a pro rata basis allocated the Forbury Retail Park Site (to which this application relates) has an indicative potential of 644 - 962 dwellings.

Given the policy constraints on building heights, precluding buildings over 18m or 12 storeys, there are limited ways in which the application Site could deliver an appropriate quantum of residential development. The application proposes up to 700 dwellings which is comfortably within the density parameters that have been identified as suitable on this Site by Reading Borough Council in their adopted Local Plan and the more recent Draft Local Plan partial update which is currently undergoing examination.

Given the limited ways in which the identified density can be achieved on the Site, the live application represents an excellent opportunity to deliver the objectives of the Local Plan and Site allocation. It is therefore clearly a development proposal within a settlement to which Policy S4 applies.

Any significant effects arising from the Proposed Development are most likely to relate principally to matters of scale and massing. However, those matters must be assessed in the context of the Site's status as an allocated, previously developed site within the settlement of Reading, and the Council's own conclusion that the Site is suitable for a substantial quantum of residential-led development. The proposed delivery of up to 700 dwellings sits within the indicative capacity identified for the Site and does not breach the relevant policy parameters for building height.

Accordingly, under Policy S4, the proposal should be approved unless the benefits of doing so would be substantially outweighed by adverse effects when assessed against the national decision-making policies in the Framework. In circumstances where the scale and massing are a consequence of delivering the quantum of development expressly contemplated by the allocation, those effects should not be treated as substantially outweighing the significant benefits of delivering housing-led redevelopment on this sustainable urban site.

Affordable Housing Viability in the Context of Policies S4 and DM3

The above policy context is also relevant to the consideration of affordable housing and viability. Especially considering Policy H3 of the Local Plan expressly allows viability to be taken into account. NPPF Policy DM3(1)(e) of the August 2026 NPPF requires local planning authorities to consider whether otherwise unacceptable development proposals could be made acceptable through the use of planning conditions or planning obligations, while Policy DM3(1)(f) states that applications which should clearly be approved should not be refused, having regard to the development plan, the Framework and other material considerations. Those provisions sit alongside the PPG on viability, which confirms that the purpose of viability assessment in decision-taking is to establish whether the value generated by a development is more than the cost of developing it, having regard to gross development value, costs, land value, landowner premium and developer return.

The Applicant's Financial Viability Assessment, prepared by DS2, concluded that the Proposed Development would generate a substantial deficit and could not viably support affordable housing. That conclusion has also been confirmed by the Council's independent viability review carried out by BPS. The PPG makes clear that, where a viability assessment is justified at application stage, the assessment should follow the standardised national approach, including assessment of benchmark land value, development costs and an appropriate developer return. Applying that methodology, the agreed position is that affordable housing cannot be supported by the scheme at the present time.

In that context, it would not be appropriate to treat the Applicant's willingness to continue promoting the scheme as evidence that affordable housing is not a barrier to delivery. The relevant planning question under the NPPF and PPG is whether the development can viably support affordable housing obligations, not why the Applicant may decide, for separate commercial, strategic or land-management reasons, to pursue a scheme which is shown to be loss-making. To approach the matter otherwise would require the decision-maker to speculate on the Applicant's wider commercial decision-making and would move away from the standardised viability methodology required by national policy and guidance.

This approach is also consistent with the national policy approach to planning obligations, including Policy DM3(1)(e) of the August 2026 NPPF, which requires decision-makers to consider whether otherwise unacceptable development proposals could be made acceptable through the use of planning conditions or planning obligations. Planning obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. Where the tested viability evidence demonstrates that affordable housing cannot presently be supported, it would not be appropriate to require such provision on the basis of a separate judgment about the Applicant's commercial motivations. The appropriate mechanism, where justified, is to secure viability review provisions so that any future improvement in viability can be captured over the lifetime of the development.

This is particularly important having regard to Policy S4. The Site is an allocated, previously developed site within the settlement of Reading, and the Proposed Development would deliver a substantial quantum of housing in a highly sustainable location. Policy S4 establishes that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by adverse effects when assessed against the national decision-making policies in the Framework. In circumstances where the tested viability evidence demonstrates that affordable housing cannot currently be supported, it would be inconsistent with the positive decision-making approach in Policies S4 and DM3 to resist or delay the delivery of an otherwise strongly supported housing-led redevelopment on the basis of an affordable housing contribution

that does not completely align with the policy target. Developers may make a commercial decision to proceed with a development even where the scheme's viability is shown to be in deficit.

Policy L2: Making Effective Use of Land

The August 2026 NPPF places greater emphasis on the optimisation of brownfield land and underutilised sites. Part B of Policy L2 explicitly encourages making better use of underutilised land through:

“redeveloping underutilised retail and business sites”

The Proposed Development involves the redevelopment of an existing retail park, including large areas of car parking and low-density commercial units. As outlined within the Planning Statement, the Site currently represents an inefficient use of a highly accessible Site. The proposal therefore directly achieves the objectives of Policy L2.

Policy L3: Achieving Appropriate Densities

Policy L3 provides a more prescriptive approach to the density of residential and mixed-use development, and is therefore directly relevant to the proposed residential-led development of the Site.

Policy L3(1) establishes the overarching requirement for development proposals to make effective use of land. In assessing whether this has been achieved, regard should be given to the identified need for housing and other development, local market conditions, the availability of infrastructure, the Site's connectivity, and the importance of securing well-designed, attractive and healthy places. These considerations broadly reflect those previously identified in Paragraph 129 of the December 2024 NPPF.

However, Policy L3 then introduces more specific requirements concerning increased densities within settlements and minimum densities around well-connected stations.

Policy L3(2)(a) states that residential and mixed-use development within settlements should contribute to an increase in the density of the area in which it is situated. The only exception is where there is clear justification that an increase is inappropriate or not possible, for example because the prevailing density is already high, or an increase would conflict with another policy in the Framework. While existing character remains a relevant consideration through **Policy DP3**, the policy expressly states that character should not preclude development which makes the most of an area's potential.

The Site forms part of the urban area of Reading. It currently comprises low-rise retail warehousing and extensive areas of surface-level car parking. Its redevelopment for up to 700 homes and complementary commercial uses would therefore materially increase the density of development in this part of Reading, and make more efficient use of an allocated, previously developed Site. This is in accordance with Policy L3(2)(a).

Policy L3(2)(c) introduces a specific minimum density requirement for residential and mixed-use development within reasonable walking distance of a well-connected station, stating:

“Where development proposals for residential or mixed-use schemes are within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B), a density of at least 35 dwellings per hectare should be achieved within the net developable area of the site. Higher densities – of at least 45 dwellings per hectare – should be achieved where the service frequency is at least twice that of the minimum required for a well-connected station. Exceptions to meeting these minimum standards should be made only in the case of:

- i. Sites which fall below the threshold for major development where it can be demonstrated that meeting the standard is either inappropriate or not possible; or*
- ii. Development for traveller sites”.*

Annex B defines a well-connected station as:

“Railway stations and underground, tram and light rail stops located within a top 80 Travel to Work Area located partially or fully within England by Gross Value Added (GVA)⁷² and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by at least four trains or trams per hour overall, or at least two trains or trams per hour in any one direction”.

Reading Railway Station constitutes a "well-connected station" for the purposes of the NPPF definition as defined in Annex B, as it is located within the Reading Travel to Work Area, one of the top 80 TTWAs in England by GVA, and is served throughout the daytime by rail services at frequencies substantially in excess of the minimum threshold of four trains per hour overall. Further, the Site is located within reasonable walking distance c. 490 metres east of the Station.

Annex B also defines reasonable walking distance:

“for the purpose of policies S5, L3, GB7 (relating to land around well-connected stations), this should be considered to be around 800 metres, or around 10 minutes’ walk time if topography, route availability and quality or physical barriers would prevent or discourage walking from up to 800 metres away.”

As the Site is covered by both definitions in Annex B: ‘within reasonable walking distance’ and of a ‘well-connected station’, Policy L3 requires development of the Site to achieve a minimum density of 45 dwellings per hectare within the net developable area subject to. Annex B defines the net developable area broadly and includes land occupied by housing, access roads, hard landscaping, communal amenity areas and incidental open spaces.

The Proposed Development would deliver up to 700 dwellings on a Site of approximately 2.94 hectares, which equals a gross density of c. 238 dwellings per hectare. The proposal therefore exceeds the minimum density expectations established by Policy L3. No maximum density limit is set, or inferred to.

Importantly, Policy L3(3) goes further and states the following:

“The minimum densities in paragraph 2(c) of this policy should be exceeded where possible, especially in areas of high connectivity, to optimise the efficient use of land. The Connectivity Tool (Connectivity

Tool - GOV.UK) should be used alongside other relevant quantitative or qualitative evidence in assessing the connectivity of particular locations proposed for development.”

The Connectivity Tool has been introduced as a mechanism for assessing how well locations are connected to employment, services, facilities and public transport, and is intended to inform decisions regarding the most sustainable locations for growth. As above, Policy L3 specifically states that the Connectivity Tool should be used alongside other evidence, to determine whether high densities are appropriate.

The Connectivity Tool Lite indicates that the Site has a connectivity score of 85, as shown in Figure 3 below.

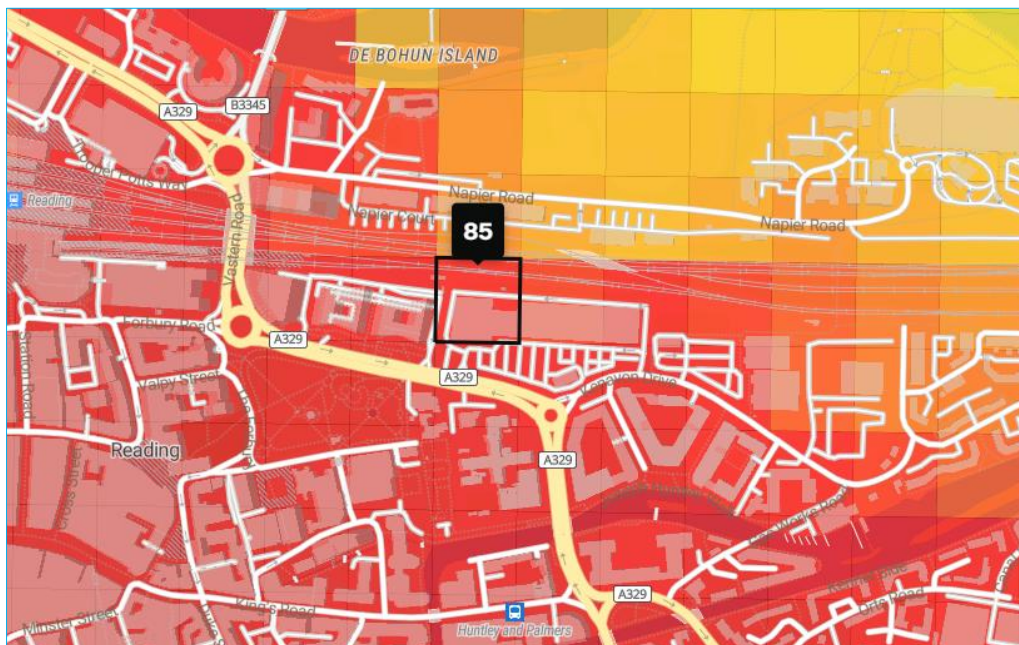


Figure 3: Extract from GOV.UK Connectivity Tool Lite

This score places the Site within the highest category of connectivity and indicates that it is exceptionally well connected in national policy terms. This reflects the Site’s proximity to Reading Station, its accessibility to employment opportunities, retail and leisure facilities within Reading Town Centre, and the availability of frequent transport services and active travel routes.

Accordingly, the proposed density exceeds the minimum thresholds established by Policy L3(2)(c) in accordance with part 3 of the Policy, and reflects the policy expectations that development densities should be maximised in well-connected locations.

Policy HO7: Meeting the Need for Homes

The Planning Statement identified the significant benefit arising from the delivery of up to 700 dwellings. Chapter 5 of the 2024 NPPF emphasised the importance of identifying and bringing forward sufficient land to meet housing needs.

The August 2026 NPPF strengthens this position through the introduction of Policy HO7, which requires **substantial weight** to be given to the benefits of providing homes that contribute towards meeting identified accommodation needs.

This is particularly relevant in the context of Reading's identified housing requirement. Policy H1 of the adopted Local Plan seeks the delivery of at least 15,847 additional homes between 2013 and 2036, whilst the emerging Partial Update increases the annual housing requirement from 689 dwellings per annum to 825 dwellings per annum.

The proposed delivery of up to 700 dwellings would therefore make a substantial contribution towards both adopted and emerging housing targets. The introduction of Policy HO7 reinforces the significant public benefits associated with housing delivery on this allocated brownfield site and explicitly states that this should be given substantial weight in the planning balance.

Policy TR2: Local Parking Standards

Policy TR2(3)(e) is particularly relevant to the Proposed Development. The proposal comprises a high-density mixed-use development for which the Reading Borough Council Parking Standards do not prescribe a specific parking requirement. The policy expressly recognises that parking standards may need to vary according to the type and mix of development and that a degree of flexibility may be appropriate in certain circumstances. In this regard, the proposed parking strategy proposed has regard to the Site's highly sustainable location, the mixed-use nature of the development and the absence of a directly applicable parking standard. It therefore represents a proportionate, site-specific approach.

As established above, the Site is located within reasonable walking distance (less than 800 metres) from a well-connected station. Sites that meet this threshold have been differentiated within Policy L3, and as such, it is clear that the Site subject to this proposal should be differentiated from Sites more than 800 metres from the Station, and would meet circumstances to enable the parking flexibility described in Policy TR2(3)(e).

Transport Development Control has outlined that the 53 total spaces proposed to serve the food store are not in accordance with the Council's adopted standard. As outlined within our response sent on 6 August 2026, the parking strategy should be assessed in the context of the Site's highly accessible location on foot and by bicycle and the nature of the proposed development, rather than through a rigid application of parking standards. The introduction of Policy TR2 provides further support for this approach by explicitly recognising that flexibility may be appropriate when applying parking standards to particular types and mixes of development.

SUMMARY

The August 2026 NPPF introduces several new policies that are directly relevant to the determination of the Application. In particular, the revised framework places greater emphasis on directing growth towards sustainable locations within settlements, and making more effective use of previously development land through the optimisation of development densities in well-connected locations. A significant focus of this revision is to boost housing delivery.

The Site's allocation within Policy CR13b, its location within the urban area of Reading, its proximity to Reading Station and its Connectivity Tool score of 85, all mean that it aligns strongly with the reinforced focus established by the revised Framework. Policies S4, L2 and L3 provide more explicit support for the high-density

redevelopment of underutilised brownfield land in highly accessible locations, whilst Policy HO7 requires substantial weight to be afforded to the benefits arising from delivery of housing.

The Proposed Development would deliver up to 700 dwellings on an allocated brownfield Site and would make a substantial contribution towards Reading's identified housing needs. The revised NPPF therefore not only continues to support the principle of development proposed, but places an increased emphasis on the delivery of high-density homes as a key component of sustainable development.

The revised Framework is also relevant to the consideration of affordable housing and viability. The tested viability evidence, including both the Applicant's FVA and the Council's independent review, demonstrates that the Proposed Development cannot currently support affordable housing. In that context, Policies S4 and DM3, read together with the PPG viability guidance, support a positive and proportionate decision-making approach which relies on the agreed viability evidence rather than speculation as to the Applicant's wider commercial decision-making. The appropriate mechanism, where justified, is to secure viability review provisions to capture any future improvement in viability, rather than resisting or delaying the delivery of an otherwise policy compliant housing-led redevelopment which achieves the principal objectives of its allocation. Notwithstanding, the substantial common ground about the findings of the submitted FVA by the Council's own consultants, the applicant is willing to discuss and agree an affordable housing offer.

Accordingly, the publication of the August 2026 NPPF does not alter the conclusions reached within the submitted Planning Statement. Rather, the updated Framework reinforces and strengthens the planning case for the Proposed Development, particularly in relation to the delivery of housing, the optimisation of an underutilised brownfield site, the efficient use of land in a highly sustainable and well-connected location, and the proportionate consideration of affordable housing viability.

Yours sincerely,



Montagu Evans LLP