

CENTRAL READING

Reading Borough Council response to Issue 10:

Are the policies for Central Reading justified, deliverable and consistent with national policy?



Q1. Is the strategy for Central Reading justified?

The strategy for Central Reading is justified. The broad strategy is a continuation of the spatial strategy of the Reading Central Area Action Plan (PP005), as this has been successful in guiding development, and is only partway through its implementation.

The level of development planned for the area stems from the assessment of capacity undertaken in the Housing and Economic Land Availability Assessment (HELAA, EV014 and EV015). This considered that the area could accommodate approximately 7,600 homes between 2013 and 2036, around 15% of the total planned for, 71,000 sq m of office floorspace (63% of total) and up to 27,000 sq m of retail and related floorspace (77% of total), as identified in paragraph 5.2.16 of the Local Plan.

The three central elements of the spatial strategy are movement and transport, land use and urban design. Also of importance is the very high level of heritage interest across much of the centre, particularly south of the railway.

Movement and transport

In terms of movement and transport, the centre of Reading has many advantages to build on. It is one of the most accessible locations in the South East with excellent public transport links, including to London and Heathrow, with a recent overhaul of Reading station and interchanges, and ongoing proposals for a new system of Mass Rapid Transit and Park and Rides. Major transport improvements will be critical for supporting the amount of development proposed in the centre of Reading.

Some of the routes and locations for these proposed and existing transport schemes are within or adjoining some significant potential development areas. For instance, the proposed Mass Rapid Transit routes passes through or alongside all three Major Opportunity Areas, whilst the Station/River area contains both the new station and interchanges and a new pedestrian/cycle bridge over the Thames. It is vital that development in these areas does not miss an opportunity to enable and capitalise on these schemes, in particular by ensuring that land is available for routes, stops and interchanges.

With these improvements proposed at a high level, it is particularly critical that it is as easy to get around the centre as possible, particularly by foot and cycle. Historically, the centre of Reading suffers from a degree of fragmentation between different areas, particularly emphasised by physical barriers such as the river, railway and the Inner Distribution Road (IDR). The City Centre Framework (EV032) has demonstrated the effect that these barriers have had on both growth of the centre and movement to and from it. Recent development in line with the RCAAP strategy has helped to break these barriers down, through new bridges and routes, but some remain, particularly the IDR.

Of particular importance is ensuring that there is no fragmentation between the station and the core of the centre. This is not solely due to the importance of the station in terms of public transport access, but also because of the opportunity to

turn the wider station area into a major destination and the high level of physical capacity to provide development. This should therefore be integrated into the existing centre. The importance of this area is such that north-south links across the centre should be the corridor that is given most emphasis, and most weight given to the need to break down the physical barriers.

The overall approach is therefore based around increasing connectivity and permeability and breaking down physical barriers within the central area. As well as the north-south corridor, there will be other key movement corridors (in terms of pedestrian and cycle movement), particularly linking the Major Opportunity Areas with each other, the station, the core of the centre and the rest of Reading. These general movements are identified in the overall strategy and in the strategies for the Major Opportunity Areas.

Land use

The need for the centre to contain a mix of uses is well established and fully in line with national policy. This ensures that there is vitality and activity at all times of the day, and that the centre has a range of different services and facilities so that a single trip can serve a number of purposes. Mixing uses can occur both horizontally (i.e. a number of different uses at ground level) and vertically (different uses housed above each other). However, a simple mix across the whole centre is also unlikely to be the best solution. Uses such as retail and offices have different locational requirements, and should be dealt with in different ways.

The Western Berkshire Retail and Commercial Leisure Assessment (EV020) identified the needs for new retail floorspace in Reading, and in line with national policy this should be directed in the first instance to the centre of Reading. The key consideration in guiding where this development should be located is to avoid over-extending the centre to the extent that it fragments and can no longer operate as a single entity, with potential negative impacts on the existing core. Therefore, this area needs to include those areas where there is clear capacity for new retail development but which links into the existing shopping core. The new link under the station allows this to extend north of the railway.

However, there are sites which are not immediately adjacent to the Primary Shopping Area which may still be appropriate for some retail development. There are advantages to locating some bulky goods retailing on the edge of centres, as the reality is that much of this shopping is car-based, for instance the Cattle Market. Meanwhile, a new community at Kenavon Drive offers scope for some small-scale local retailing in order to support this development.

As for retail, the strategy should generally direct leisure uses, including evening leisure uses, to certain areas to maintain the compact nature of the mixed-use core, and so that several purposes can be fulfilled in the space of one visit to the centre. In recent years, leisure and retailing have become increasingly linked, so that retailing in itself has become a leisure pursuit. The parts of the river Thames that are accessible from the core of the centre and which have an urban character will also be appropriate for some leisure uses, to link in with informal leisure and recreation activities along the river. This strategy also seeks to ensure that evening

leisure uses that may cause disturbance are not within areas that are purely residential in nature.

For offices, there has been a significant refocusing in the town centre in recent years, with older stock in fringe locations such as Kings Road and London Street struggling to find occupiers and being converted to residential, whilst major new office developments are constructed in close proximity to the station. Access from the station and to the various services and facilities of the town centre are the key advantages the centre offers over business park locations. The focus for office development should be on the locations closest to the station, which will reduce the need to travel by car, and where there is substantial capacity, in particular within the Station/River Major Opportunity Area.

Housing brings activity and natural surveillance to streets and areas that might otherwise be empty outside normal business hours. This can help to reduce crime and the fear of crime in these areas, as well as giving the impression of a healthy living centre. It also allows people to live and work in the same area, thereby reducing the need to travel. Residential development is possible across the whole area. In addition, at times when the office market is weak, residential is one of the few uses which is realistic above ground floor level in centres. Housing is not a use that attracts large numbers of people and therefore needs to be located in the areas of highest public transport accessibility. Therefore, residential development will be generally acceptable across the whole central area.

Urban design

In terms of the urban design approach, the key piece of evidence is the City Centre Framework Update 2008 (EV032), which informed the RCAAP strategy and continues to be relevant. In terms of layout, the Framework recommends continuation of the historic urban structure and grain, which consists of a north-south and east-west grid pattern, onto new development areas. It indicates that a broad mix of uses should be sought, to help to reinforce the character of the area. In addition, active uses will help to define a vibrant building edge, enhancing the continuity and enclosure of the area. Much of the guidance on scale, height and massing is related to the results of the Tall Buildings Strategy (EV030), which was prepared in conjunction/in tandem with the Framework, and to which a more recent update note (EV031) has been prepared. The result is an overall framework plan for design in the central area that has fed into the urban design strategy and framework and the policy on design in the centre (CR2).

Q2. Is the area relating to Policy CR1 properly defined and identified? Is the approach to office development and other town centre uses within Policy CR1 consistent with national policy?

The starting point for the boundaries outlined in policy CR1 is the spatial strategy as set out in section 5.2 (in particular paragraphs 5.2.5 to 5.2.10) and on figure 5.1 of the Local Plan.

Paragraph 5.2.9 sets out the need for a compact retail area, with scope for expansion in certain places, in particular to the north of the centre, which will include expanding beyond the station to take advantage of the improved pedestrian links. The Primary Shopping Area as proposed represents the key shopping areas of the existing town centre together with those areas where there is greatest scope for accommodating the additional retail identified in the Western Berkshire Retail and Commercial Leisure Assessment (EV020).

The approach to offices in the spatial strategy differs significantly from the approach to retail, and therefore the policy needs to include a separate definition of the office core. As set out in the spatial strategy, town centre offices generate substantial numbers of trips and should in the first instance be related to the areas most accessible to the station. It should be noted that this also reflects current demand for town centre office accommodation, with offices in fringe locations such as Kings Road and London Street being frequently converted to residential under permitted development rights, with major new office buildings being constructed on sites very close to the station.

The final definition of the centre needs to cover the other main town centre uses, most significantly leisure and culture. This definition is related to the retail definition, but can be slightly wider, as leisure uses tend to be destinations in themselves and do not need to be in as compact a pattern as retail. This will also take in the areas where leisure development next to the Thames can complement the riverside.

The approach to office development and to other uses is consistent with national policy, and is also essential to implement the sequential approach in paragraph 24 of the 2012 NPPF. Paragraph 23 states that local plans should “define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations”.

Q3. Are Policies CR2 and CR3 justified, and in particular are they necessary in the light of the requirements of other policies within the LP?

The justification for policies CR2 and CR3 is set out in sections 4.63 (p174-175) and 4.64 (p176 to 177) of the Local Plan Background Paper (EV001) respectively. These sections set out why they are necessary in addition to more general policies that cover similar topics elsewhere in the Local Plan, such as policy CC7.

In brief, there are specific requirements in terms of design and public realm that apply in the centre of Reading, and this leads to the need for policies in section 5 of the Local Plan. In the case of design (CR2), a City Centre Framework update (2008, EV032) looks at design considerations across the centre, and identifies a number of specific elements such as the need to reinstate and reinforce the urban grid and the need to enliven key streets and spaces with active uses, and these are elements that are reflected directly in policy CR2. In the case of public realm,

policy CR3 reflects the fact that provision of open space in the centre will need to take a different form in many cases to elsewhere, due to the constraints of sites. In the centre, the Open Spaces Strategy (EV021) has identified a specific need for a series of specific provisions for the centre, such as the creation of a coherent series of public space experiences, whilst the Reading 2050 Vision (OP009) contains a strong focus on the rivers and waterways. These are elements that are directly reflected in policy CR3.

Therefore, it is considered that policies CR2 and CR3 add important centre-specific elements to the overall policy approach for the Borough, and are therefore necessary.

Q4. Will Policy CR4 be effective, and is it sufficiently clear as to how a decision maker should react to proposals for regionally significant tourist attractions?

The justification for policy CR4 is set out in section 4.65 (p177-178) of the Local Plan Background Paper (EV001). The policy will be effective in that it provides policy support to a range of leisure, culture and tourism uses, although it needs to operate in tandem with policy CR1 in terms of applying the sequential approach, and specific allocations involving leisure uses.

The wording 'non-regionally significant' is a hangover from policy RC7 of the Reading Central Area Action Plan (PP005), which was prepared under the South East Plan, which directed regionally-significant tourism facilities to certain locations in the region. It is therefore accepted that this specific wording is no longer required and the policy would not be harmed by its removal, although it is still consistent with the focus on smaller-scale development within the rest of the sentence.

Q5. Is Policy CR6 justified and will it be effective? How will the restrictions set out in paragraph 5.3.27 in respect of serviced apartments be effectively applied?

The justification for policy CR6 is set out in section 4.67 (p181-183) of the Local Plan Background Paper (EV001). It is considered that the policy will be effective, and it is generally very similar to existing policy RC9 in the Reading Central Area Action Plan, which has been in place since 2009 and has been effective in managing residential development in central Reading. There needs to be an inherent degree of flexibility in policies regarding mix of sizes in central Reading, where sites can be constrained both by viability and by their own physical restrictions.

In terms of the restrictions on the length of occupation set out in paragraph 5.3.27, this is already being applied through either planning conditions or Section 106 agreements. For instance, condition 6 on planning permission 160087 at 72 Bath Road restricts occupants to a maximum stay of three months. Meanwhile, in permission 121408 at Foudry Place, Kennet Island, the permission for serviced

apartments is accompanied by a Section 106 agreement that limits 90% of the units to a three month occupation, and 10% to a maximum of six months. The Section 106 also includes an agreement to provide evidence to demonstrate compliance with the above within 14 days of a written request. Therefore, it is considered that these restrictions will continue to be effectively applied.

Q6. What is the evidence justifying the proportion of A1/A2 uses as set out in Policy CR7? Are the boundaries appropriately defined?

The justification for the proportions of A1/A2 uses set out in Policy CR7 is set out in section 4.68 (p183-185) of the Local Plan Background Paper (EV001). This demonstrates that, in the majority of cases, these frontages are above 50% A1 and A2. The important point in these locations is to ensure that the overall retail character is retained, whilst recognising that the core streets in the town centre must be allowed some leeway to change and adapt as the role of town centres evolves. For this reason, 50% is considered to be an appropriate requirement that strikes this balance whilst at the same time being likely to be effective.

The existing frontages shown on the Proposals Map are appropriately defined, and represent the main shopping streets in the town centre. The proposed frontages, also shown on the Proposals Map, represent generalised routes within the Major Opportunity Areas, which link into the key movement corridors shown on Figures 5.3 and 5.4, and emphasise that these corridors need to be enlivened with active uses, as well as complement existing active frontages.

Q7. What is the justification for Policy CR9 and why is it considered to be an appropriate mechanism in this particular circumstance? Is the approach consistent with national policy?

The justification for inclusion of Policy CR9, which carries forward an existing policy approach from the Reading Central Area Action Plan, is set out in section 4.70 (pages 186-187) of the Local Plan Background Paper (EV001). In the town centre, the Local Plan seeks to balance accommodating a significant amount of modern, high-quality development with retaining and enhancing those areas which make a significant contribution to the character of the centre. These small terraces sit within the core of the centre, and form a strong contrast with the high-density nature of the town centre. They are remnants of housing areas that once covered much of the town centre, including much of what is now the West Side Major Opportunity Area and the Inner Distribution Road and serve as a reminder of Reading's Victorian industrial heritage. The individual buildings contained within these areas are not generally considered of particular heritage interest in their own right, hence why listing, local listing or conservation area designation is not the appropriate approach, but rather their importance is conferred by the juxtaposition with the high-density modern development with which they are surrounded.

This approach is consistent with national policy. National policy on design and character is of greater relevance than the historic environment policies, since, as argued above, it is the contribution to the overall character which is of most importance rather than the intrinsic historic value of the buildings. The NPPF (2012) states in paragraph 58 that policies should ensure that developments “respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation”, and paragraph 60 adds that it is “proper to seek to promote or reinforce local distinctiveness”. Paragraph 61 further states that “planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment”.

In addition to this, when considering the historic environment in general, the NPPF also states that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment, and that this should take into account “the desirability of new development making a positive contribution to local character and distinctiveness” and “opportunities to draw on the contribution made by the historic environment to the character of a place” (paragraph 126). Historic England has welcomed this policy as part of this positive strategy for the historic environment.

Q8. Are the requirements of Policy CR10 justified and up to date?

The requirements of Policy CR10 are justified and up to date. The main justification for CR10 is set out in the Tall Buildings Strategy (EV030). This examined the ability of sites in Central Reading to accommodate tall buildings, and from this developed an approach to tall buildings that took into account matters such as townscape and views, heritage, transport access, flood risk and market demand, culminating in a suggested policy approach that directly led to the policy as drafted.

The Tall Buildings Strategy dates from 2008 and was drafted to inform the Reading Central Area Action Plan. Representations on the Local Plan have maintained that the document is out-of-date. To address this issue, the Council has prepared a Tall Buildings Strategy 2018 Update Note (EV031) that revisited the matters that the original Tall Buildings Strategy considered, and asked whether changes that had taken place would affect its conclusions. This included looking in particular at changes to townscape and to the key views. Whilst the development of a number of tall buildings, whether completed, under construction or still outstanding, has clearly altered these elements in places, the conclusion of the update note is that the findings of the Tall Buildings Strategy remain relevant. In particular, this is because the tall buildings policy in the Reading Central Area Action Plan, RC13, has been effective in ensuring that tall buildings have been developed in line with this strategy.

Q8a. Will the individual elements and areas identified be effective and consistent with other policies in the LP (CR10a, CR10b, CR10c and section (v))?

The individual elements and areas identified in policy CR10 will be effective, and, as identified by the Tall Buildings Update Note (EV031), have been very effective for the last ten years. No tall buildings have been developed on sites outside the tall buildings clusters identified in the Tall Buildings Strategy and RCAAP policy RC13. Where applications have been received within the designated clusters, the policy has proven effective in ensuring that development is as envisaged within the relevant part of the policy, as has happened for example on the Cooper BMW site within CR10a, where an application for three tall buildings was refused and a single tall building is now under construction.

The one issue raised through consultation specifically about the effectiveness of the policy is by Ropemaker Properties, in relation to the western grouping (CR10b), since the RCAAP policy envisaged a number of tall buildings, and only one has so far been developed. However, the end point of the RCAAP (2026) has not yet been reached, and major areas of the western grouping anticipated for development, i.e. Hosier Street and the Broad Street Mall (which cover 48% of the western grouping area), have not yet been developed. There are no indications that the policy approach to tall buildings has prevented these sites coming forward.

The Council strongly believes that the individual elements and areas are consistent with other policies in the Local Plan. Section 3.8 (p38-44) of the Local Plan Background Paper (EV002) examines internal consistency of the Local Plan, and is based on a matrix of policies contained at Appendix 8 (p318) of the paper. This highlights that the policy approach helps to achieve the aims of a number of policies, such as CC6, CC7, CR11 and CR12. A number of issues are explored in more detail in that section, specifically the relationship with heritage and landscape policies, and the degree to which the approach limits the potential to meet housing needs. Please see points 12, 14, 20 and 27 of that section of the Background Paper. In considering consistency with other policies in the plan, it is important to bear in mind that tall buildings are neither the only nor necessarily the best way of delivering high density development to meet needs, an issue which is explored in more depth on p5-7 of the Tall Buildings Strategy Update Note (EV031).

SITE ALLOCATIONS - CENTRAL READING

Q9. How is bullet (i) of Policy CR11 intended to be delivered, and will it be clear to the decision maker what is required?

Bullet (i) of policy CR11 is as follows:

“Contribute towards providing a high-density mix of uses to create a destination in itself and capitalise on its role as one of the most accessible locations in the south east. Development for education will be an acceptable part of the mix;”

This will be delivered through development management decisions on sites within the area. This requirement feeds into the specific requirements for the sub-areas later in the policy. For the majority of the area, there is more detail contained within the Reading Station Area Framework (PP012), which looks in particular at distribution of different land uses across the area and at how high-density will be delivered in different parts of the area, which will assist a decision maker.

A similar (if not identical) bullet (i) was contained in policy RC1 of the Reading Central Area Action Plan (PP005) for the same area. This criterion of the policy has been used to determine a number of developments in the area since the RCAAP was adopted in 2009, including permissions at Station Hill (130436), the former Cooper BMW site/Napier Road junction (162166) and 52-55 Friar Street and 12 Greyfriars Road (162210). There has been no confusion about what is required by the policy in dealing with proposals in this area, and there is no reason why this should not continue in the future.

Q10. Has the potential for high density development in relation to Policy CR11a been fully explored and is the site boundary properly identified? Will Policy CR11a deliver other policy requirements in relation to Central Reading?

In terms of the areas identified within the existing boundaries, the potential for high density development has been fully explored. This sub-area differs from most of the others in that it comprises a large number of relatively small plots, in different ownerships, which may come forward at different times.

Figure 10.1 is an annotated map of the area. It shows that there has been recent development on parts of the site, for residential, offices and hotels, and there is no prospect that these sites will be further developed in the plan period. There are two listed buildings in the area that will need to be retained (although there may be potential for conversion). Accounting for existing public realm, this leaves approximately 0.51 ha as being appropriate for redevelopment. Complicating the issue still further, some of the existing office buildings have been granted prior approval for conversion from office to residential. It is not clear whether these prior approvals will necessarily be implemented, as this can sometimes merely be a valuation exercise, but the HELAA calculations assume that any prior approval in place at the time fixes the residential capacity of these sites. It is therefore the remaining 0.29 ha which has fed into the remaining development potential of the site, as set out in the HELAA (see site AB001 in HELAA Volume II, EV015). The potential height of such development is also constrained by the presence of listed buildings and side-facing upper floor residential or hotel windows on some adjacent sites, which means that an average height of seven storeys is assumed. It is difficult to see how substantial capacity for additional high density development within the site's existing boundaries could be assumed.



Figure 10.1: Annotated Map of Friar Street/Station Road sub-area

The one clear possible location for higher density development is 29-35 Station Road, which is referred to in the representations by K2 Developments. This site previously had planning permission for a 22-storey building including 103 dwellings, but this expired in January 2016. A development of a similar scale could therefore potentially be acceptable, and would be broadly consistent with policy CR11a. However, this site now has prior approval for conversion of offices to 33 dwellings, and, since this could be implemented at any time, it is not considered appropriate to assume this kind of uplift in dwellings.

As well as high-density mix of uses, policy CR11a will achieve a number of other policy objectives for Central Reading. In particular, the location of the Station Road frontage on a key part of the north-south axis through the centre as shown on figure 5.1 of the Local Plan is critical, and improvements to this frontage will help to facilitate those north-south pedestrian movements. Development in this location, where existing buildings detract from the character of the centre, will also help to contribute to a high quality of design (see key principle c) for Central Reading) and improve the setting of heritage assets (key principle i)).

Q11. Would the requirements of Policy CR11c, CR13a and CR13c be robust in relation to the potential effects of development on the historic environment?

The requirements of policy CR11c, CR13a and CR13c, as well as any other relevant sites within the Major Opportunity Areas, will be robust in relation to the potential

effects on this historic environment. All development will need to comply with the general criteria within the relevant policies, i.e. criteria v) and vi) of CR11 and v) and vi) of CR13, as well as general policies EN1 to EN6 and national planning policy.

There are instances where more detail on how development should consider the historic environment is helpful, and is contained within current Supplementary Planning Documents. For CR13a, the Reading Prison Framework (adopted 2015) considers the archaeological significance of the site, and the significance of the listed building, in more depth. For CR11c and many of the surrounding sites, the Reading Station Area Framework (adopted 2010) takes heritage and important views into account in looking at issues such as building massing and height. In both cases, the supporting text refers to these documents.

In the case of CR11a and CR13c, Historic England has requested a specific commitment to conserving and enhancing the setting of listed buildings, but this would add nothing to policy that is already in CR11 (v) and CR13 (v).

Q12. In relation to Policy CR11i is there a realistic prospect that the development of the Network Rail depot will be deliverable within the Plan period?

Network Rail considers that there is a realistic prospect of delivery of this part of the site within the plan period. NR's representations to the Draft Local Plan, which nominated this site for development, stated that:

"It is anticipated that following the upgrade work to the rail network on the west side of Reading, an area of operational land within the "Railway Triangle" off Cow Lane will become available. This is likely to provide an opportunity to re-locate the depot and storage facilities currently at Napier Road to the Railway Triangle. Our holding at Napier Road would then become vacant and suitable for a residential development."

It should further be noted that operational development in the Railway Triangle is likely to benefit from Network Rail's permitted development rights, and that there may not be any planning constraints on this taking place. The availability of this site cannot be guaranteed, but there is considered to be adequate likelihood of delivery to justify its inclusion.

Q13. Is it necessary to identify the potential for delivery of public realm improvements in Policy CR11j, if not why not?

There is no policy CR11j within the Local Plan. It is assumed that this refers to the representation by Greyfriars Church that an additional site CR11j containing Greyfriars Church and its surroundings should be identified with potential for public realm improvements and modernisation.

Greyfriars Church is one of Reading's most significant historic buildings, dates from the 14th Century, and is Grade I listed. Its listing states that it is "said to be the most complete surviving example of Franciscan- architecture in England". There are some modern additions and a parking area within the curtilage of the church, but there is no scope for significant development to take place. Therefore, including it as part of policy CR11, which is focused on high-density redevelopment to capitalise on the accessibility of the Station/River area, would send out completely the wrong message.

It is also not considered that it is appropriate to identify this site as a site allocation in its own right. Since there are no prospects that this site would help to meet identified development needs, such as for housing, there is little to gain from identifying the site as an allocation in the document. All that an allocation could do in advance of very significant heritage assessment work would be to advocate public realm improvements and enhancements to the setting of the building, all of which are in any case covered by general policies in the Local Plan such as EN1 and CR3.

Q14. Will Policy CR12a be effective, and in particular what is meant by being 'designed to mesh into the urban fabric'?

Policy CR12a is expected to be effective. The Cattle Market site is Council-owned, and there is an intention to develop or dispose of the site within the plan period, although this is subject to overcoming a legal requirement under the Berkshire Act to provide a site for a cattle market, which is being investigated.

Where the policy refers to being "designed to mesh into the urban fabric", this is a recognition that the proposal includes retail development, and in particular mentions bulky goods retailing. As can be seen on sites elsewhere in Reading such as Forbury Retail Park, bulky goods retailing can entail large boxes surrounded by car parking, which represents an under-use of space and detracts from the character of central Reading. Policy CR12a seeks to avoid this being repeated here, and wants to ensure that development is experienced as part of the urban form of the centre. This can be addressed through design and layout, and is likely to involve residential development on upper storeys, and potentially wrapping around more prominent frontages.

Q15. Would Policy CR12b be effective? Is the requirement to replace 'some' units sufficiently clear and justified?

It is considered that policy CR12b would be effective, in that it would be deliverable within the plan period. Two of the smaller sites within the allocation (21 Caversham Road and 6-14 Weldale Street) have recently been completed for a total of 25 dwellings. Planning application 170326 for 427 dwellings and a ground floor shop/restaurant unit was permitted in March 2018, and this represents the vast majority of the site which is expected to be developed during the plan period. There are no firm proposals for the other, small sites within the area at the current

time, although the owners at 45 Caversham Road consider that the site would be likely to be available should development proposals be progressed in the plan period. The figures in the HELAA and Housing Trajectory (on which the H1 requirement is based) do not anticipate any residential development on that part of the site containing small business units.

In terms of replacement of some or all of the small business units, it is considered that this is justified. Section 4.31 (p101-102) of the Local Plan Background Paper (EV002) sets out the justification for policy EM4, which seeks to retain and increase the provision of small business units. This outlines the importance of space for small businesses for economic growth, and their significance as part of the Strategic Economic Plan. In line with EM4, some form of replacement of small business space would be required. However, it is considered that replacement of exactly the same amount of floorspace for small business space may be difficult to achieve given the constraints of the site, and any lower limit on space is likely to be purely arbitrary. The policy wording is therefore considered to be the most justifiable approach.

Q16. Is the requirement for the replacement of the Hexagon theatre in Policy CR12e justified and consistent with the accompanying text set out in paragraph 5.4.17?

Policy CR12e seeks to ensure that there is adequate theatre provision in Reading. The Council, which owns the Hexagon, has previously considered replacement of the Hexagon on this site or elsewhere, and the intention is that any replacement would be on the same site. However, although there are issues with the current theatre building, the Council's limited resources mean there are no current firm plans for re-provision. Therefore, there is not a requirement to replace the current theatre, but it is important to ensure that the site can only be developed if there is replacement of the theatre. On 20th July 2018, the Council published a draft Hosier Street Framework¹, which anticipates retention of the Hexagon for the immediate future. The intention of paragraph 5.4.17 is to also reflect this situation, but it is agreed that it could be interpreted as requiring replacement within the plan period. The following change to 5.4.17 could therefore resolve the issue:

"The policy requires that, where the Hexagon site is proposed to be developed, there should be replacement within the same area."

Q17. Is Policy CR13b requirements for residential development deliverable and based on robust evidence?

It is considered that residential development is deliverable within the area identified as CR13b. Site CR13b is divided into three ownerships shown on Figure 10.2, and each is treated separately below.

¹ <https://consult.reading.gov.uk/dens/draft-hosier-street-area-development-framework/>

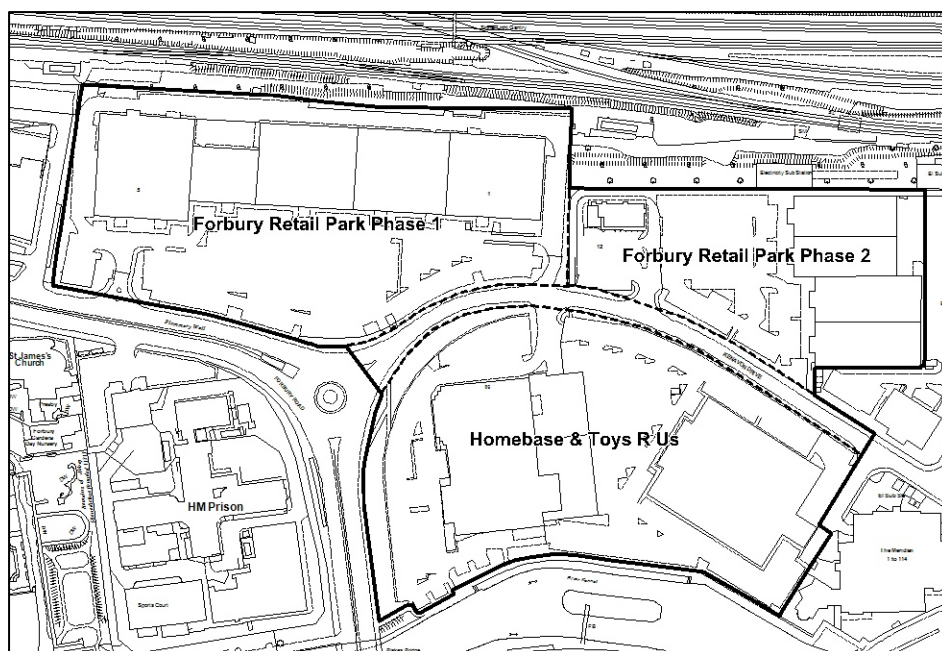


Figure 10.2: CR13b Forbury Retail Park

The Homebase and Toys R Us site has been the subject of planning application 170509 for redevelopment for 765 dwellings units and five commercial units, together with public realm, landscaping, accesses, parking and associated works. This was resolved to be granted at Planning Applications Committee in January 2010, subject to completion of a Section 106 agreement. At the time of writing, this agreement had not yet been completed. The existing retail units have now been vacated, and the site is ready to be developed once permission is granted. This is therefore expected to be delivered early in the plan period.

Forbury Retail Park Phase 1 is in use for retail warehousing, and is owned by RBS Pension Trustee Ltd. In responding to requests about availability in drawing up the HELAA, the owner identified that there is potential for the site to become available during the plan period, but that this was not certain, and if so would be in the ten years 2026-2036. In representations to the Local Plan, the owner stated:

“Given the high existing use value of the established commercial floorspace, it is not economically viable to redevelop the Site for residential land uses in the short to medium term.

Furthermore, given the uncertainty linked to longer term forecasts of development costs and values, it is impossible to predict whether a residential led redevelopment of the Site will become viable in the longer term.”

It is therefore considered that the site is potentially deliverable, and it is therefore appropriate to continue to include it in the policy as being a long-term allocation, but there is not sufficient certainty to rely upon delivery of housing on this site in the plan period. For that reason, although the policy dwelling range allows for development of this site, the figures in the HELAA and Housing Trajectory (on which the H1 requirement is based) do not anticipate any residential development on this site in the plan period.

Forbury Retail Park Phase 2 is in use for retail warehousing and is owned by Aviva Life and Pensions. Whilst there are no current firm plans for residential development of the site, Aviva have been involved throughout the Local Plan process (and indeed in drawing up the Reading Central Area Action Plan) and have supported the proposed allocation and expressed no issues with potential delivery. As the site is in existing use, delivery cannot of course be guaranteed, but it is considered that there is a reasonable long-term prospect of delivery in the second half of the plan period.

Q18. Are the requirements in Policy CR13d justified?

The requirements in policy CR13d are justified. There are four main requirements, and these are justified as follows:

- Enhance character of river/river gateway to Reading: The site is highly prominent, located very close to the point where the rivers Thames and Kennet meet, and directly adjacent to the Wokingham to Reading railway line. It marks the most easterly point of central Reading. There is clear potential for this site to make a significant contribution to the arrival into the centre and to the improvement of the riverside environment.
- Public access along river: This site represents the longest gap in pedestrian access along the northern side of the Kennet in the urban area of Reading. There is a very clear and unique opportunity here to link the footpath to the south of Kennet Walk with the Thames towpath, and thus help to fulfil key principle d) in the Strategy for Central Reading, and criterion ix) of policy CR13.
- Development set back 10 metres from river: This reference is consistent with policy EN11 on waterside sites, and is strongly recommended by the Environment Agency to enhance the ecological role of rivers.
- Potential contamination: The site has been used for gas storage, under a past hazardous substances consent, and the need for any contamination on site to be remediated is therefore clear, and is accepted by SGN, the landowners, in their Pre-Submission Local Plan representation.

Q19. Are the requirements of Policy CR14g correctly identified and justified?

The requirements of Policy CR14g are correctly identified and justified. This proposes an extension to The Oracle shopping centre, involving retail development on the site north of Mill Lane, and moving the public car park to the site to the south. This proposal raises particular considerations highlighted in the policy.

Hammerson plc, which owns The Oracle, has made Pre-Submission representations seeking a more open allocation for extensions to The Oracle, as it is considered that there are other options for this extension. However, in its representations,

Hammerson has not identified any specific potential extensions. The Council is not in a position to guess where these extensions could be, other than a small extension at Yield Hall Place which was subject to a planning permission which has now expired. The Oracle is within a constrained town centre site, with Castle Street/St Mary's Butts Conservation Area immediately to the north-west, and Market Place/London Street Conservation Area to the east and south. There are a number of listed buildings in close proximity, and the High Bridge to the east is a scheduled ancient monument. There is flood risk associated with the site, as the Kennet and Avon Canal and Holy Brook both flow through the site. Given these, and potentially other, sensitivities, it is not considered appropriate for a policy to endorse expansion without there being greater clarity about where and how such expansion could take place. It is not considered that such a policy approach could be justified.

It should be noted that Hammerson plc formally withdrew their objection to policy CR14g on 3rd September 2018 (see e-mail in Appendix 1).

Q20. Will it be clear to the decision maker how to react to the references to enhanced pedestrian access and hydropower in Policy CR14m?

It should be clear to the decision-maker how the references to enhanced pedestrian access and generation of hydropower should be considered, in that the reference is to 'potential' for these elements rather than a requirement. Therefore, proposals which include these elements will be acceptable subject to other relevant considerations, but they will not be essential. In the case of hydropower, application 151715 for hydropower infrastructure (two Archimedean Screw Turbines plus a hut containing the associated infrastructure) on the footpath next to Caversham Weir was permitted in May 2017.

Q21. Are the requirements of Policy CR16 justified and will the policy be effective?

The justification for the requirements of Policy CR16 are set out in section 4.77 (p205-206) of the Local Plan Background Paper (EV001). This highlights the key strategic location of this area, between the likely highest density development area of Reading on one side and a conservation area on the other, as well as the contribution that this area makes towards the character of central Reading in its own right. The requirements of CR16 are not considered to be particularly onerous and allow for the potential of development and conversion within the area, whilst ensuring that the area continues to contribute towards the overall character of the town centre.

It is considered that the policy will be effective, in that it will be for a decision-maker to judge whether the character of the Harris Arcade and Station Road and Friar Street frontages is maintained. This is not a development allocation as such,

and the Local Plan does not rely on delivery of any specific development, and retention of the current building and uses would therefore also be acceptable.

**APPENDIX 1: NOTIFICATION FROM HAMMERSON PLC OF WITHDRAWAL OF
OBJECTION**

From: [Rachel Jones](#)
To: [Worringham, Mark](#)
Subject: RE: Draft Local Plan - Representations on behalf of Hammerson Plc
Date: 03 September 2018 16:31:35

Hi Mark,

I am sorry for the delay in getting in contact with you, but further to a recent meeting with Giorgio, I have been instructed by Hammerson to withdraw their objection to the Local Plan.

I trust this is acceptable, but please let me know if you need anything further from us at this stage.

Kind Regards,
Rachel

From: Worringham, Mark [<mailto:Mark.Worringham@reading.gov.uk>]
Sent: 15 June 2017 10:05
To: Rachel Jones
Subject: RE: Draft Local Plan - Representations on behalf of Hammerson Plc

Rachel

Thank you for your comments on the Draft Local Plan. I can confirm that your response has been received and will be taken into account in taking the Local Plan forward. Please let us know if there are any queries.

Kind regards,

Mark Worringham
Planning Policy Team Leader
Planning Section | Directorate of Environment and Neighbourhood Services

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From: Rachel Jones [<mailto:Rachel@simply-planning.com>]
Sent: 14 June 2017 12:55
To: Planning Policy
Subject: Draft Local Plan - Representations on behalf of Hammerson Plc

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Please see attached representations made on behalf of Hammerson Plc, owners of The Oracle Shopping Centre.

We would be happy to meet officers to discuss the content of these representations, if considered helpful.

Kind Regards,

Rachel Jones

Director



15 Buckingham Gate, London, SW1E 6LB

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