

SOUTH READING

Reading Borough Council response to Issue 11:

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



Q1. Is the strategy for South Reading justified?

The strategy for South Reading is justified. The reasoning for the strategy is generally set out within the text of the Local Plan itself.

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 3,700 homes between 2013 and 2036, around 24% of the total planned for, and around 190,000 sq m of employment floorspace, the large majority of that planned for, as identified in paragraph 6.2.4 of the Local Plan.

The area has already identified as having potential for growth in the West of Berkshire Spatial Planning Framework (OP004), which emerged from duty to co-operate discussions. South Reading includes Reading's most extensive employment areas, and its proximity to M4 Junction 11 makes it a clear location to accommodate future industrial and warehouse needs. However, there are also significant opportunities for residential, making use of some older and less important commercial land. The growth within the areas inside Reading's boundaries sits within the context of potentially high levels of development immediately to the south of Reading, in Wokingham and West Berkshire. This includes development underway around Shinfield and Spencers Wood as part of Wokingham's existing Core Strategy, and potential development at Grazeley, straddling the boundary between Wokingham and West Berkshire. This growth has infrastructure implications for Reading, and improved transport links, such as those being provided through current and future mass rapid transit routes are essential.

At the same time, the existing communities in South Reading contain Reading's most significant concentrations of deprivation. Therefore, there exists a clear opportunity for new development to meet Reading's needs to also provide benefits to existing communities, through strengthening district centres, physical links between new and existing communities and good access to new jobs. There may also be opportunities for some suburban renewal within these communities.

SITE ALLOCATIONS - SOUTH READING

Q2. Are the requirements in Policy SR1a justified and will they be effective?

The requirements in Policy SR1a are justified. As for other site allocations, SR1a has been considered through the Housing and Economic Land Availability Assessment (EV014 & EV015), with the allocation SR1a comprising three sites assessed within the HELAA - WH017, WH020 and WH047. This process highlighted a number of the issues that then fed into requirements of both SR1 generally and SR1a specifically, such as the need for a strong buffer to new residential under construction at Green Park to the south, and the need for careful consideration of landscape impacts.

The most recent use of the site was as landfill. The Council has recently had experience of a planning application on previous landfill at Royal Elm Park (planning application reference 160199), and there needed to be considerable technical work before this could be demonstrated to be safe. The Royal Elm Park application differs from any development on SR1a in that it includes significant levels of residential and therefore the potential risk to human health is greater, but at the same time the landfill at SR1a is more recent. The Council is confident that a deliverable technical solution can be found, but this is nevertheless a matter of significant importance that needs to be dealt with at planning application stage.

SR1a also refers to the need for development to have regard to the whole site and for access to be considered as a comprehensive whole. This is simply a reflection of the way that the various parcels are laid out. Two of the parcels (HELAA sites WH017 and WH020) are in one ownership, and have direct access to Island Road. A third site (WH047) is in Council ownership and has no direct vehicular access. A full consideration of how the sites work together is therefore necessary. The Council has amended the Submission version of the Local Plan to make clear that a single comprehensive development is not however required.

In terms of whether the requirements will be effective, none of them are unreasonable and they are not considered to present any undue threat to delivery of the development. As set out in the Pre-Submission representations from Roxhill Developments Ltd, there have been pre-application discussions on the development of the majority of this site (excluding the smaller WH020 and WH047 parcels), in which these issues have all been discussed, and work is still underway on preparing a planning application. An Environmental Impact Assessment Screening Opinion (reference 170101) for this development was issued on 21st February 2017. Appendix 1 contains an e-mail from Barton Willmore on behalf of Roxhill Developments Ltd, containing the latest position on the site and demonstrating that the policy is likely to be effective.

Q3. Will Policy SR2 be effective, and is there justification for the general requirements (for example criterion viii and x) if these can be met through the General Policies of the LP?

It is considered that Policy SR2 will be effective in that there are reasonable prospects of delivery during the plan period, albeit that it is expected that this will be in the latter stages of the plan period. The intention of the landowner of the Beacontree Plaza part of the site in responding to availability queries through the HELAA process part of the site is to redevelop for residential. There has been previous interest expressed in residential development of the adjacent site at 1-3 Gillette Way. The Council owns the freehold on much of the remainder, although the position of existing leases means that the potential of much of this is longer term.

Whilst general policies may theoretically be able to meet some of the requirements set out in the policy, this is the case for many of the criteria within the site allocations throughout the Local Plan. The purpose of the wording of each

allocation is to highlight those areas where there is known to be a potential issue, which increases certainty and clarity for developers, decision-makers and members of the public. In most cases, these criteria draw on work that has already been undertaken in preparing the Local Plan that might otherwise be overlooked in decision-making.

Criterion viii) refers to surface water flooding, contamination and water quality. Surface water flooding is an issue that affects parts of the site and which is identified in the Sequential and Exception Test (EV028, see p14-15). According to the Council's records, parts of the site have potential for contamination, an issue which has been raised through the HELAA process. Finally, in terms of water quality, this requirement was introduced to respond to Thames Water concerns at Issues and Options stage about the potential for development to affect the ground water boreholes which serve the Fobney Water Treatment works.

In terms of criterion x), the Council's archaeological consultants, Berkshire Archaeology, provided comments on each proposed site allocation in March 2017, which has informed consideration of the sites and the wording of any criteria, if necessary. Berkshire Archaeology's comment on SR2 was as follows:

"Assessment on parts of the site shows potential for prehistoric and Roman archaeology. Small amount of trial trenching has taken place with few results, but large areas of the site require assessment for the potential for archaeology to have survived previous development - which will inform a more detailed response."

Q4. What would be the effect on Policy SR4e if the existing permission for offices was implemented?

The effect on Policy SR4e if the existing permission for offices was implemented would be that the identified potential for 11,000-13,000 sq m of industrial and warehousing floorspace would not be delivered in the plan period. This would reduce the amount of floorspace for which there are specifically identified sites for industrial and warehousing in the Housing and Economic Land Availability Assessment (HELAA, EV014 & EV015) from 112,000 sq m to 103,000 sq m, which is some 46,000 sq m below the identified needs.

However, meeting the needs for industry and warehousing already expects some intensification within employment areas, as set out in section 4.28 of the Local Plan Background Paper (EV002) and expanded upon in the Reading Employment Area Analysis (EV010). The 46,000 sq m shortfall in needs still falls within the range for potential intensification within the latter document (27,000 to 51,000 sq m on top of the HELAA figures), and so the loss of this site would not necessarily prevent the overall employment needs being met.

It is not expected that implementation of the existing permission is likely. The redevelopment of the site for 33,910 sq m of offices was first permitted by application 990690 in February 2002 (although it was subsequently extended in

2006 and 2009). Although the site was cleared in 2010, there have been no signs of construction of the permitted offices beginning.

Q5. Is there robust evidence for the way in which the potential development at Grazeley is approached within the LP? What is the justification for not referring to other potential development sites in adjoining authorities other than at Grazeley?

The Local Plan refers to two potential adjoining major development areas, Grazeley and an area south west of Reading. These areas are shown on the overall spatial strategy in Figure 3.2, as well as the strategies for South Reading (Figure 6.1) and West Reading and Tilehurst (Figure 7.1).

The rationale for the inclusion of these two areas is that these are the only two major potential areas of growth on the edge of Reading that have emerged as having potential from work that has been undertaken under the duty to co-operate, specifically through the West of Berkshire Spatial Planning Framework (OP004). These areas are both shown as areas of search on Plan 1 (p15) of that document.

Of the areas shown, Grazeley is far more developed as a potential location for growth, and there is therefore more detail that should be reflected in Reading's Local Plan. Paragraphs 25-27 of the Spatial Planning Framework present a clear outline for what a development might entail, including approximate scale of development and likely infrastructure needs. Substantial work has been undertaken on preparation of an Expression of Interest in support of a Garden Settlement at Grazeley, prepared for Wokingham, West Berkshire and Reading and submitted in July 2016¹, and then subsequently in preparation of a £300m Housing Infrastructure Fund bid in September 2017.

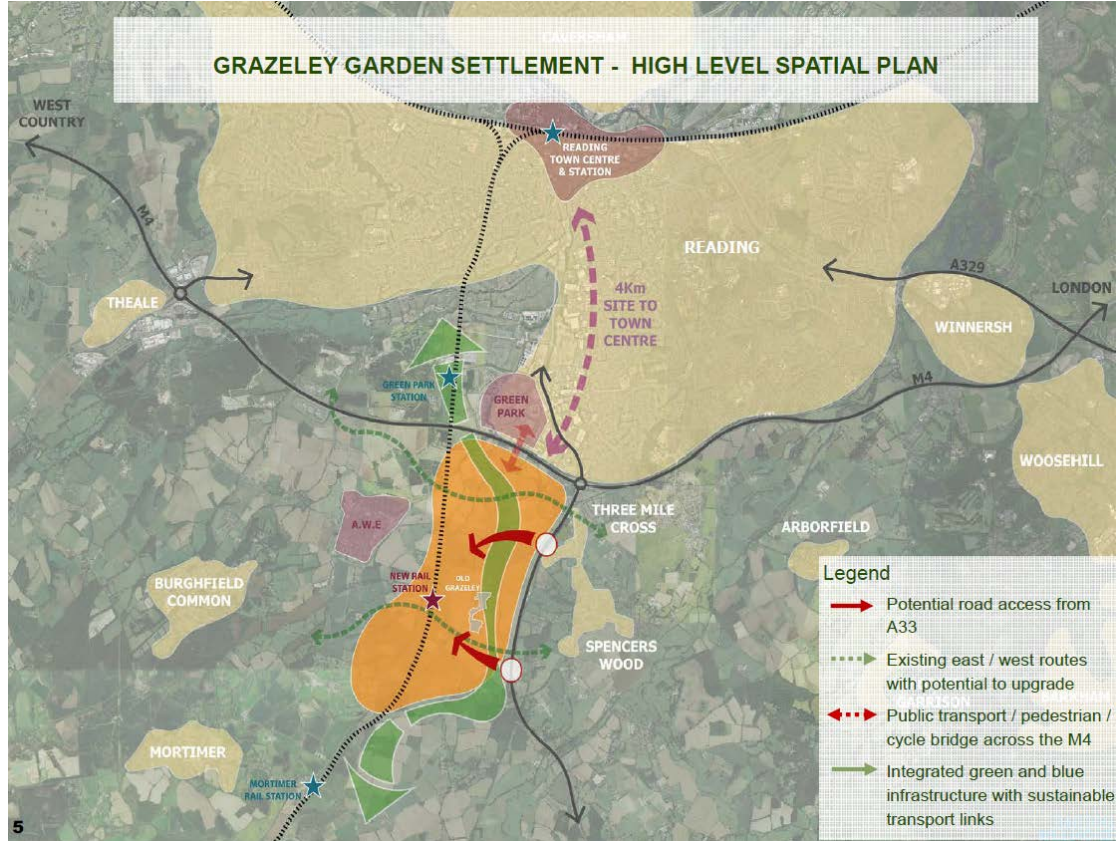
The main difference between how the Local Plan treats Grazeley and the South West Reading area is through inclusion of a specific allocation SR4f in the Local Plan. This simply reflects the degree to which possible developments in these areas have been progressed. Unlike for South West Reading, work undertaken so far shows a small part of Reading Borough (SR4f) as being within the boundary of the Grazeley proposal, albeit that those boundaries are not currently fully defined. Figure 11.1, an extract from the Expression of Interest (July 2016) shows that this land is within the Grazeley area. It is therefore considered that progress on the Grazeley proposals may require the identification of the land in SR4f, and that an allocation in Reading's Local Plan is required.

The scale of potential development on the edge of Reading that may potentially have the backing of the relevant local authorities must be taken into account in a Local Plan with an end date of 2036, particularly since those developments are likely to include transport links into Reading and may rely on Reading for higher order services and facilities. However, at the same time, the Council must be careful to be clear that it is ultimately for Local Plans in adjoining areas to

¹ <http://www.wokingham.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=409645>

formally allocate these sites, and in advance of that the Local Plan can only treat these areas as possibilities. The Local Plan cannot subvert the plan-making process for neighbours, and to fail to defer to adjoining Local Plans would likely lead to a duty to co-operate objection from neighbouring authorities.

Figure 11.1: Potential Grazeley Garden Settlement (from Expression of Interest)



In terms of any other potential major development locations outside the Borough boundary, the Council is in particular aware of proposals around the northern fringes of Reading within South Oxfordshire, which have been advocated by landowners and developers in representations to the Pre-Submission Draft Local Plan. The difference from Grazeley and South West Reading is that, at the time of drafting the Local Plan, these sites had been excluded from the Local Plan of the relevant local planning authority. South Oxfordshire’s plan-making process was more advanced than Wokingham and West Berkshire, but none of these sites were included within South Oxfordshire’s Local Plan, and, indeed, the option of major growth on the outskirts of Reading had been rejected by South Oxfordshire District Council early in their plan-making process, at ‘Refined Options’ stage in February 2015. This was the Council’s understanding at the point of submission.

The Council is aware that SODC has subsequently re-opened the process of considering a number of sites as potential strategic allocations, including three on the edges of Reading, in view of delivery concerns about one of the main allocations in the South Oxfordshire Local Plan. These sites on the edge of Reading are Palmers Riding Stables, the part of Reading Golf Course in South Oxfordshire and Play Hatch. This is referred to in the Council’s Response to Initial Comments and Questions (EC001, Q2). This is a procedural step requested by South

Oxfordshire's Cabinet, and the sites were chosen purely on the basis of scale rather than likely acceptability. There is not yet any indication that these sites are likely to be included within a revised version of South Oxfordshire's Local Plan. As such, it is not considered that there is a need to change the approach of the Submission Draft Local Plan regarding development in South Oxfordshire.

It should be noted that, even though it does not, and cannot, form a policy or proposal as such in the Local Plan, approximate options for direction of expansion of Reading beyond the Borough boundaries were considered in the Sustainability Appraisal of the Pre-Submission Draft Local Plan (LP005, see p566 to 571) to inform the general comments that the Local Plan makes, and, although there were both positive and negative effects associated with each, more negative effects were identified for the northernmost options.

It should be noted that no concerns about the way in which the Local Plan treats potential development sites outside the Borough boundaries have been raised during Pre-Submission consultation by any of South Oxfordshire District Council, Wokingham Borough Council or West Berkshire District Council.

Q5a. How should the decision maker react to proposals coming forward ahead of its inclusion within other Local Plans, and what would be the effect on Policy SR4f?

The policy wording is clear that, for any development to be in line with policy SR4f, a wider development would need to be included within the Local Plans of Wokingham and West Berkshire. If a proposal were to come forward in advance of this, it would have to be treated as an unallocated site. As for other unallocated sites, it would therefore need to be considered on its merits with regard to other policies in the Local Plan.

As the site is part of the wider ownership of the Englefield Estate, one of the main landowners that supported the Expression of Interest, it is not likely that development proposals for this site would come forward in advance of a wider scheme. At the very least, it would need to be part of a smaller cross-boundary proposal as the piece of land within Reading could not be accessed by road other than from Wokingham Borough.

Q6. Is the area relating to Policy SR5 and Kennetside leisure and recreation provision properly defined? Is there the potential for proposals to effect the operation of Thames Water Treatment Works and if so, is it clear to the decision maker how to react to such proposals?

The areas subject to policy SR5 (Leisure and Recreation Use of the Kennetside Areas) are properly defined, as the boundaries are shown with a dark green dotted line on the Proposals Map. The reason why these sites have been included under

the banner of this policy are set out in section 4.82 (pages 212-213) of the Local Plan Background Paper (EV002).

Thames Water, in its representations on the Pre-Submission Draft Local Plan, stated that:

“Whilst we do not object to the Policy itself, we have a concern with regards to a marina being a potential use. Thames Water would need to be satisfied that there would be no adverse impact due to, for example, increased turbidity.”

Thames Water suggested alterations to both the policy and the supporting text to resolve their concerns, which the Council has incorporated in the Submission version.

Therefore, whilst there is potential for impacts on the operation of the Water Treatment Works, this will be entirely dependent on the type, scale and character of any use.

Any issues arising at planning application stage will need to be resolved through direct liaison with Thames Water as the operator of the Water Treatment Works. The Local Plan at paragraph 6.3.20 makes clear that this should happen at the earliest possible opportunity, which would ideally be pre-application stage. Failure to demonstrate that there will be no such adverse effects, or that such effects will be mitigated, will mean that development is not acceptable in policy terms.

**APPENDIX 1: E-MAIL FROM BARTON WILLMORE ON BEHALF OF ROXHILL
DEVELOPMENTS LTD**

From: [Simon Flisher](#)
To: [Worringham, Mark](#)
Subject: Reading Borough Local Plan - Policy SR1a
Date: 15 August 2018 08:38:37
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image006.png](#)
[image007.jpg](#)

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

Good morning Mark,

As discussed yesterday, I am pleased to summarise the current status of the project for the development of the development of land at Island Road that is identified in the emerging Reading Borough Local Plan at Policy SR1a:

- The Policy SR1a land is in the control of Roxhill Developments Ltd. Roxhill is a leading specialist developer of industrial and distribution projects and delivers premium product throughout the UK. Further details of Roxhill can be found at www.roxhill.co.uk;
- A planning application for the development of the Policy SR1a area, in accordance with the policy, is currently in preparation;
- Positive pre-application discussions are taking place with Reading Borough Council's development management team, including project meetings, and also with other relevant stakeholders;
- The technical and environmental reports that would be required by Reading Borough Council to support a planning application are currently in preparation;
- It is expected that the planning application will be formally submitted to Reading Borough Council later this year.

On this basis, Policy SR1a would be delivered through the forthcoming planning application.

Should you require any further details at this stage, please do not hesitate to let me know.

Regards,

Simon Flisher

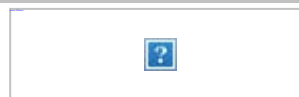
Director



DDI: [01322 374677](tel:01322374677)

W: www.bartonwillmore.co.uk

The Observatory, Southfleet Road, Castle Hill, Ebbsfleet, DA10 0DF



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