

WEST READING AND TILEHURST

Reading Borough Council response to Issue 12:

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



Q1. Is the strategy for West Reading and Tilehurst justified?

The strategy for West Reading and Tilehurst 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 2,400 homes between 2013 and 2036, around 15% of the total planned for, but much more limited commercial development, as identified in paragraph 7.2.4 of the Local Plan.

West Reading and Tilehurst is an existing primarily residential area (with some commercial elements) where the opportunities for development are generally around previously developed sites which form part of the existing fabric. As such, there is not particular scope for variation within the strategy. However, there are some opportunities for development within the area, including regeneration of the Meadway district centre, a number of primarily local authority housing estates where there may be scope for suburban renewal (albeit that delivery may be beyond the plan period) and potential for some limited reallocation of employment land. However, most employment areas in West Reading make a significant contribution to Reading's economy and should be retained.

There are also elements of the natural environment that are key to the area's character and need to be recognised, such as the Thames and Kennet floodplains on either side of the area, the network of woodlands with biodiversity and landscape significance throughout Tilehurst, and the presence of two Areas of Outstanding Natural Beauty in close proximity.

SITE ALLOCATIONS - WEST READING AND TILEHURST

Q2. Is the approach towards Park Lane Primary School, the Laurels and Downing Road as set out in Policy WR2 justified, and will it be effective?

The Governors of Park Lane Primary School, supported by Reading Borough Council have held a long term ambition to combine the operations of the school, which currently occupy four separate sites, onto a single site. This would significantly improve the efficient and effective operation of the school in serving its local community. However, it can only happen if parts of the existing school estate are sold as development land to realise sufficient receipts to enable the extension of the Laurels and the various other works that are needed to provide an acceptable single site development along with improvements to other community facilities.

The four sites are proposed for development as follows:

- The Laurels, School Road would be extended and the existing buildings on the site will be extended/redeveloped to provide a 2 forms of entry primary

school with early years nursery provision, associated hard play areas and playing fields, along with replacement community facilities.

- Park Lane Infants School. This is currently the main infants' school site. It contains an attractive, Victorian brick building (unlisted) with frontage onto Park Lane and with entrances from Chapel Hill and Downing Road.
- The Park Lane Annex contains a single storey prefabricated building with frontage to the eastern side of Downing Road. The depth of site is only 13m which is very shallow for modern development. It is proposed that this site be used for community uses.
- The Downing Road School Playing Field. The site comprises an area of private school playing field which is fenced off and is not accessible to the public.

The sites are all close to the shops and facilities in Tilehurst Triangle District Centre. They are very accessible sites being close to services, facilities and public transport.

Implementation of the proposed policy will significantly improve the efficient and effective operation of the local primary school in serving its local community. While the Downing Road Playing Field currently provides a green space in this area, the site is not publicly available and is a good location for development in view of its proximity to access to transport, services and employment.

A Draft Playing Pitches Strategy (EV023) has been undertaken which looks at Downing Road, which is not in use for community sports provision. It concludes that the site could be developed if mitigation were provided in terms of provision of youth 11 vs 11 pitches:

“The PPS identifies that there is a need for additional youth 11 v 11 and junior 9 v 9 grass pitches currently and in the future. The current school playing field at Downing Road is not used for community clubs for sport and there is no identified school use. Due to the need for improvements to youth 11 v 11 pitches currently and in the future, if these playing fields are to be developed, there will be a requirement for mitigation to improve facilities within the area. The nearest facility is Victoria Recreation Ground” (paragraph 1.71).

As there is scope to improve provision at Victoria Recreation Ground, which is protected in the Local Plan as Local Green Space, it is considered that the loss of the playing field is capable of mitigation. Nonetheless, the policy should retain the reference to more detailed justification at planning application stage, to ensure that this is addressed at that point.

In terms of effectiveness, the development continues to represent an ambition of the Council. However, this will require adequate funding, which is neither currently identified nor likely to be forthcoming in the immediate future given Council resource constraints. For this reason, whilst delivery within the plan period is possible, it is not certain, and the housing trajectory and figures in H1 do not currently include delivery of any homes on this site.

Q3. Are the requirements of bullets 1 and 2 (access and parking) within Policies WR3a and WR3b justified and consistent with the Transport policies in the LP? [This would also apply to Policy ER1f for example].

The requirements of bullets 1 and 2 of WR3a and WR3b are justified and consistent with the general transport policies of the Local Plan.

There are width restrictions in the area preventing larger vehicles from exiting the Cardiff Road area from routes other than Richfield Avenue, which ensure that the residential areas west of Caversham Road are not impacted by commercial vehicle traffic. These are in the following locations:

- Cardiff Road, between the junctions with Addison Road and York Road;
- Ross Road, east of the junction with Addison Road; and
- Addison Road, north of the junction with Ross Road.

There is also a restriction on all vehicles except for cycles on Cardiff Road west of the junction with Milford Road. These locations are broadly located to keep most of the residential and commercial traffic apart, but this is difficult with the current distribution of uses, where there are areas which have both residential and commercial access (e.g. Ross Road and Cardiff Road). Policies WR3a and WR3b result in a more clear-cut separation of residential and commercial uses, and a shift of that transition further west, which will mean an opportunity to reconsider how the access restrictions are set up. The comments from the local residents' association, the Bell Tower Community Association, at Draft Local Plan stage, requested a reconsideration of the location of these access restrictions as part of the development.

In terms of parking, both Addison Road and the residential end of Cardiff Road are already heavily used for on-street parking, and, where parking is permitted on those roads, residents' permit holder schemes are in place. There is not considered to be capacity for additional on-street parking on these roads, and accommodating parking within the site is therefore essential. Again, this is supported by the Bell Tower Community Association, who requested at Draft Local Plan stage that the requirement relating to accommodating parking on-site in WR3a was extended to WR3b¹.

Keeping residential and commercial access separate and preventing existing parking issues from being exacerbated is very much in line with policy TR3, with its emphasis on ensuring the safety and functioning of the highway network, and criterion iv) which seeks to avoid regular HGV movements on unsuitable roads. These requirements are therefore consistent with the general transport requirements.

For information, planning application reference 171814 for redevelopment for 96 dwellings on the former Cox and Wyman site (WR3a) was resolved to be granted subject to the signing of a Section 106 agreement at Planning Applications Committee on 30th May 2018.

¹ The requirement within ER1f was also inserted in response to local resident's representation, and reflects the narrowness of surrounding streets and the difficulty of accommodating on-street parking.

Q3a. Is the requirement for commercial development on the western edge of the site justified?

Policy WR3a does not require commercial development on the western edge of the site, but posits it as a potential solution to providing a better transition from commercial to residential in the area. Assuming that WR3b is delivered, the western edge of the WR3a will be the main frontage to the commercial areas within the Core Employment Area, and one possible solution is lower-key commercial uses on the western fringe fringed by a buffer towards residential. However, this is not the only possible approach, and the policy therefore only refers to 'potential' for this to occur. Application 171814, with a resolution to grant subject to Section 106, does not include this commercial element.

Q4. Is the need for comprehensive development as set out in Policy WR3i justified?

It is assumed that this refers to WR3h rather than WR3i, as WR3i has no requirement for comprehensive development.

There have been a number of previous applications for development of part of this site, and this has informed the wording of the allocation, initially in the Sites and Detailed Policies Document, and now carried across in the Local Plan. Planning applications 070758 and 071461 in 2007 were for the development of five flats on land comprising parts of the back gardens of 303-309 Oxford Road. Planning application 120926 in 2012 was for five houses on land to the rear of 313-315 Oxford Road. All applications were refused, with, among other issues, the lack of a comprehensive solution resulting in overlooking of rear gardens, and unsatisfactory layouts of amenity space, access, car parking and bin stores. The lack of a comprehensive solution formed an explicit reason for refusal of both 071461 and 120926. The reason for refusal of 071461 is as follows:

“The proposed development fails to provide a comprehensive solution to the development of the rear gardens of properties in this area and would compromise the most efficient and best use of land in this location, contrary to policy H6 of the Berkshire Structure Plan (2005), saved policy HSG9 of the Reading Borough Local Plan (1998) and policy CS7 of the Reading Borough Local Development Framework Core Strategy (2008).”

Therefore, the evidence of previous applications demonstrates that this is a site which requires a comprehensive solution in order to provide a satisfactory and functional living environment that avoids detrimental impacts on the amenity of neighbouring properties.

Q5. Is there robust evidence that the redevelopment of the Meadway Centre as set out in Policy WR3o will come forward? What is meant by the fourth bullet point of the criterion?

Planning permission 150945 was granted on the Meadway Precinct (which, together with the Asda store, makes up the entire centre) on 29th June 2017. This comprises demolition of part of the existing precinct and refurbishment of the remainder, together with an additional 3,908 sq m floorspace within use classes A1-A5, and car parking, servicing and toilets. Although development has not yet started, the grant of planning permission just over a year ago is considered to represent robust evidence of the deliverability of the scheme. The precinct is all within the ownership of the applicants, Chillingham Ltd, and there are no other known constraints on development. The agent for the owners confirmed on request on 8th August 2018 that it is still the intention of the owners to progress a development that complies with both the policy and the existing planning brief.

There are no current proposals for redevelopment of the Asda foodstore, but part of the consideration of the planning permission was to enable it to function alongside the Asda store as a much improved centre.

In terms of the fourth bullet point, the Meadway Precinct is an ageing and dated shopping precinct, is in poor condition, as well as being physically unappealing and failing to make the most of its location in design terms by turning its back on the adjacent Asda foodstore and the main vehicular entrance. There are intrinsic problems with its layout which mean that the centre's decline cannot be halted merely by bolting additional retail development onto the existing precinct. However, this is precisely what previous applications some years ago sought to do, and were refused for that reason. Therefore, the policy seeks to make clear that applications for the precinct need to address it as a whole and either significantly improve or redevelop it. The Meadway Centre Planning Brief (adopted November 2013) makes clear that comprehensive redevelopment is the Council's preferred approach, and that partial redevelopment would only be appropriate if it adequately fulfils all of the development principles in the Brief.

Q6. What is the justification for two separate policies for WR3s and WR3t? Is the allocation of these sites justified and consistent with other policies within the LP?

Although within the same ownership, sites WR3s (Land at Kentwood Hill) and WR3t (Land at Armour Hill) are separated by around 40m, with a site with recognised biodiversity importance between them, and there is not considered to be a particular reason why they should form a single allocation. The criteria within WR3s and WR3t are similar, but do have some differences (e.g. the reference to the impacts on different road junctions, and the relevance of views to the Chilterns escarpment to WR3s only), and it is therefore preferable to keep them separate.

In terms of the justification for the allocation of these sites, whilst in general terms this is set out within the HELAA, including the specific issues that have led to the criteria included (see Volume II, EV015), it is worth summarising the history of how the Local Plan has arrived at this position.

Tilehurst Poor's Land Charity owns the area bounded by Armour Road, Kentwood Hill, the Wheeler Court development, Armour Hill and properties on Lower Armour Road and Polsted Road. This includes both WR3s and WR3t, together with the whole area of the allotments and the adjacent Victoria Recreation Ground. The Charity has long had aspirations for the development of all or part of the wider site, but there has been substantial local opposition. Most of the area (excluding the recreation ground) was nominated for inclusion in the Sites and Detailed Policies Document. In the event, the version of the SDPD that the Council submitted protected most of the area as public open space, but did include a residential allocation of the existing builder's yard, which forms part, but not all, of WR3s, for 10-16 dwellings. On the recommendation of the Inspector for the SDPD, this allocation was removed, as it resulted in a piecemeal and uncoordinated development that failed to relate well to its surroundings. The Inspector's Report stated that

"The Council may wish in the future to consider a more comprehensive approach that deals with all the land between Kentwood Hill and Armour Hill (including the builder's yard, unused land, the allotments and playing field) having regard to the needs of the area."

Since the whole site has once again been nominated for development in the Local Plan, this represents the opportunity to settle on a solution for the future of the whole area. Figure 12.1 shows the different areas of the site, and is taken from the Tilehurst Poor's Land Charity representation.

- Unused Scrubland with Trees and Brook: This piece of land, also referred to as the Withies, is a well-vegetated copse. It forms Biodiversity Action Plan priority habitat (lowland mixed deciduous woodland), and ecologist's advice on this site is that "it is likely to be of importance for a number of protected and notable species, including reptiles, birds, rare or diverse assemblages of invertebrates, badgers, and commuting and foraging bats, and as such is likely to have considerable biodiversity value." It should therefore be retained.
- Victoria Recreation Ground: This is a well-used and highly-valued local facility, at the heart of Tilehurst, and the Council has assessed this as being significant enough to form Local Green Space (see EV033, Local Green Space and Public Open Space Background Paper). A role has also been identified for this to provide 11 vs 11 football to help mitigate the loss of the Downing Road playing field under WR2. It should therefore be protected.
- Allotment Gardens: These are in-use allotments. They form a valuable and highly popular local facility, and contribute to the health and recreation of the local community. The Council has assessed this as being significant enough to form Local Green Space (see EV033, Local Green Space and Public Open Space Background Paper).

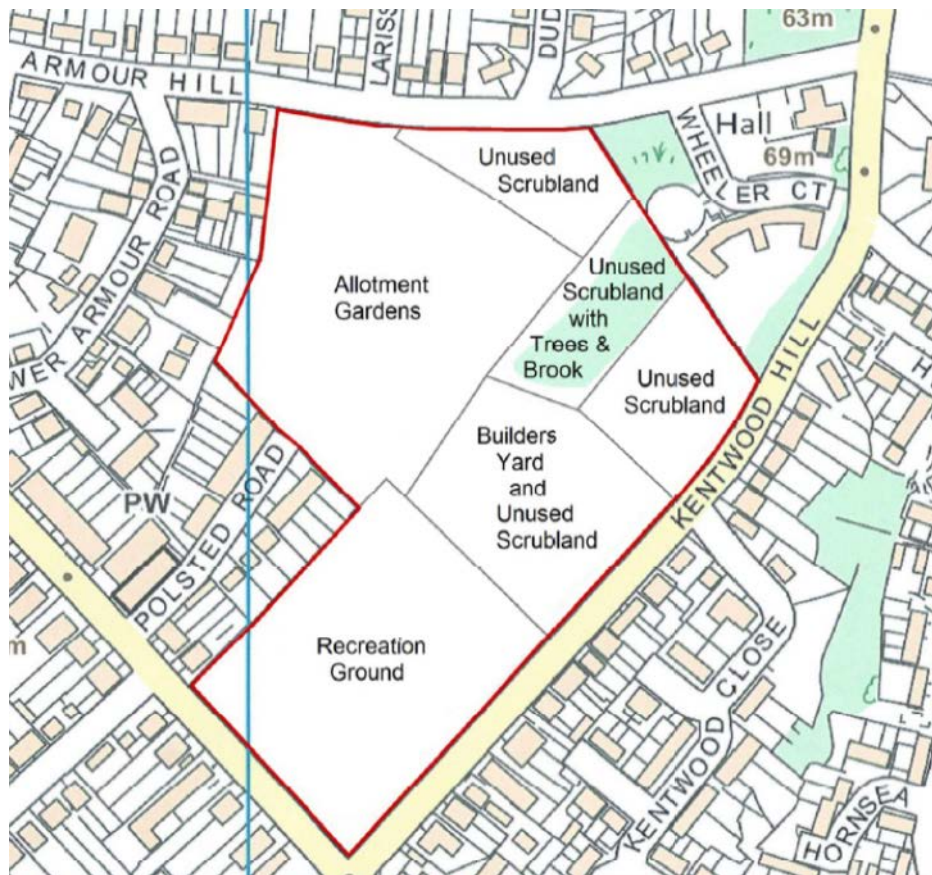


Figure 12.1: Elements in Tilehurst Poor’s Land charity ownership

- Builders yard and unused scrubland (Kentwood Hill): The area marked as ‘builders yard and unused scrubland’ comprises a builders yard which has developed over time, without authorisation, together with surrounding land including former allotments. The adjacent piece of land to the east is made up of former allotments which have long since been vacated. This area is not accessible to the public, and does not have the same biodiversity significance as the copse to the north. Whilst it does provide a landscaped frontage as a key part of the character of Kentwood Hill, this site is large enough that, were it to be developed, this frontage could be retained and enhanced in any development. With the scale of housing need identified, there is not considered to be adequate reason to protect this area of land. This area is adjacent to Wheeler Court and does not therefore form an isolated residential island to the west of Kentwood Hill.
- Unused scrubland (Armour Hill): This area once again constitutes unused land formerly part of the allotments, long since unused. Again, this is not open to the public and has limited biodiversity value. As for Kentwood Hill, the vegetated frontage to Armour Hill is of value and could be retained or enhanced. As above, in the context of the housing need, there is not a clear reason to protect the site, and it forms a logical residential site next to existing residential development at Wheeler Court.

In terms of consistency with other policies, section 3.8 of the Local Plan Background Paper (EV002) looks at the internal consistency of the plan, and explores possible issues in more detail. Point 17 on the relationship with policies that protect open space is of particular relevance to these sites, and is linked to the discussion above.