### READING BOROUGH LOCAL PLAN EXAMINATION

### **EAST READING**

### Reading Borough Council response to Issue 14:

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





#### Q1. Is the strategy for East Reading justified?

The strategy for East Reading is justified. Much of the reasoning behind the strategy is 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 1,100 homes between 2013 and 2036, around 7% of the total planned for, but very little commercial development, as identified in paragraph 9.2.4 of the Local Plan.

The strategy is dictated by the constraints and characteristics of what is already a densely developed and highly constrained area. Other than the town centre, this area contains the largest cluster of heritage assets in Reading, with it having grown up as one of Reading's main Victorian expansions, and also containing some earlier Georgian elements. There are a number of conservation areas and listed buildings. The strategy aims to balance this with the other key determinant of the approach to the area, which is the area's domination by two major institutions, the University of Reading and the Royal Berkshire Hospital, which have continued needs for development and change in and around their key campuses, but which can generate tensions with surrounding residential communities.

#### SITE ALLOCATIONS - EAST READING

## Q2. Is the site allocation of ER1h justified and consistent with other policies within the LP?

In general, the justification for the identification of site ER1h, Arthur Hill Swimming Pool, for development, as for most other identified development sites, is within the Housing and Economic Land Availability Assessment (HELAA, EV014 & EV015). This site is included as PA004 within that document.

As general background, Arthur Hill Swimming Pool was constructed circa 1911 as a purpose built swimming pool and, other than a later addition at the rear that now houses a small gym, remains largely as originally built. The pool has limited capacity but inherently high staffing and operating costs. A survey in 2015 identified that the pool is in poor condition, and would require costs of at least £650,000 to repair. Given that replacement pool provision only around 850 metres away at Palmer Park, where there are already a number of sports facilities, was proposed, and is included within the Local Plan at ER1j, it was decided by Policy Committee on 26<sup>th</sup> September 2016 that the pool should close permanently in December 2016. An Expression of Interest under the Community Right to Challenge was rejected at Policy Committee on 10th April 2017. There is no realistic prospect of the site being used for continued swimming use.

The Local Plan therefore needs to determine an appropriate future for the site. Representations have sought a continued leisure use of the facility. However,

there are no current proposals for specific leisure uses, and no particular likelihood of delivery, particularly given the proposed investment in combined leisure provision nearby. As has been shown throughout the Local Plan evidence, the most pressing development needs, and the needs which the Local Plan is not able to meet in full, are for housing. This is a narrow, constrained site with limited commercial potential, which lends itself to a residential allocation.

In terms of consistency with other policies in the Local Plan, the main possible issues are in terms of the effects on the locally-listed building and the loss of leisure.

The building was added to the local list in April 2017. Policy EN4 deals with locally important heritage assets, and states that:

"Development proposals that affect locally important heritage assets will demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset."

The local listing (see Appendix 1) highlights that the greatest significance is in terms of the frontage building to London Road, which is the main way in which the building is experienced. Figure 14.1 shows this frontage. The local listing states that:

"Greatest significance is in terms of the frontal building (Kings Road), although not great in scale, the intricacy and largely intact frontal building in the Italianate Style makes it a pleasing building of townscape merit."



Figure 14.1: Arthur Hill Pool, Kings Road frontage (source of image: Savills)

All of the specific elements referenced in the local listing - portico, original sash windows, bracketed eaves, decorative brickwork, stone window surrounds, original matching chimneys - refer principally to the frontage building. The flanks of the building are largely obscured by adjacent buildings, and the pool itself to the rear has a roof that appears to be more modern. The rear of the building as viewed from Norwood Road is far less significant, including some modern extensions, and although the local listing does note some further interest, notably arches and columns, it clarifies that these are not fully revealed. Figure 14.2 shows the rear elevation.



Figure 14.2: Arthur Hill Pool, rear (source of image: Savills)

Therefore, given that it is the frontage which is of particular significance for the local listing, policy ER1h refers to this being retained in any development.

The other possible policy conflict is with policy RL6 on protection of leisure facilities. However, the Council is committed to provision of a replacement facility on a nearby site at Palmer Park, and this site is allocated in the Local Plan as ER1j. Provision of this facility will mean that there is no need for retention of the existing facility. With this in mind, there is no intrinsic conflict with policy RL6.

Q3. Are the requirements for Policies ER2 justified, and will it be effective in terms of delivering student accommodation at the site?

The justification for policy ER2 is set out in section 4.90 (p233-235) of the Local Plan Background Paper (EV002).

In terms of the effectiveness of the policy for delivery of student accommodation, this must be viewed in terms of what the development is trying to achieve. As the Local Plan has not identified a specific quantitative need for new student accommodation, there is no specific level of accommodation that the plan seeks to deliver, either on Whiteknights Campus, or elsewhere. Effectiveness of the policy

must therefore be judged more on whether the individual criteria prevent the development of accommodation to support the University's role as a national and international educational establishment of strategic importance which will continue to adapt and expand over the plan period. In this regard, it is not considered that the requirements of the policy are particularly onerous or prevent sustainable development of the campus.

The areas of wildlife significance and green links referred to in the first bullet point affect only 18% of the part of the campus within Reading Borough, and should not prevent further development on site. References to safety of use of the campus in the second bullet point have no clear identifiable impacts on the capacity of the campus to be further developed. Issues of residential amenity in the third bullet point will mainly relate to the fringes of the campus, and would in any case not necessarily prevent development for student accommodation. Finally, the fourth bullet point on loss of open space makes it clear that this is a balanced judgement that must be considered in each case against wider public benefits, and this consideration can include whether development supports the important role that the University plays in Reading's life and economy. There is therefore nothing within the policy that would mean that it is not effective in terms of delivering student accommodation where required.

Effectiveness also relates to being based on effective joint working on cross-boundary strategic priorities. The campus sits within both Reading and Wokingham Boroughs. The need to co-operate with Wokingham Borough Council on issues around the University of Reading was identified in the Duty to Co-operate Scoping Strategy (PP008). Section 3.4 of the Duty to Co-operate Statement (EV001) considers the degree to which matters related to the University and student accommodation more generally have been dealt with under the duty to co-operate, and it is clear that there has been extensive co-operation with Wokingham Borough Council in this regard. Policy TB14 in Wokingham's Managing Development Delivery Local Plan (adopted 2014) is almost identically worded to Reading's policy, and there is therefore a consistent approach across the whole campus.

## Q4. Are the requirements for Policy ER3 justified and will the Policy be effective?

The justification for policy ER3 is set out in section 4.91 (p236-237) of the Local Plan Background Paper (EV002). The policy aims to enable continued development of the Royal Berkshire Hospital site to fulfil changing healthcare needs for its catchment (which extends considerably beyond Reading Borough). However, the policy notes particular constraints in terms of the heritage assets on site and in nearby locations and parking issues, and sets out criteria for considering these within any development proposal.

In terms of effectiveness, there is no identified level of development that the policy is seeking to achieve, and, based on discussions with the Royal Berkshire Hospital Foundation Trust, there is more likely to be a need to reconfigure space to allow for new technologies and new models of treatment than for there to be

significant expansion in floorspace. There is an outline planning permission in place which allows for a certain levels of development that has been only partially implemented, and there is therefore considered to be potential for additional floorspace, estimated by the most recent monitoring<sup>1</sup> to be almost 10,000 sq m, to be delivered within existing commitments. The policy is therefore considered likely to be effective in providing a framework to continue to allow physical development to meet healthcare needs.

No representations on the Pre-Submission Draft Local Plan have raised any significant concerns about the policy approach, either in terms of effectiveness or any other matters.

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<sup>&</sup>lt;sup>1</sup> Non-Residential Planning Commitments at 31<sup>st</sup> March 2018, http://www.reading.gov.uk/media/9169/Non-residential-planning-commitments-March-2018/pdf/Non-Residential\_Commitments\_17-18.pdf

#### APPENDIX 1: LOCAL LISTING FOR ARTHUR HILL SWIMMING POOL

# Reading Borough Council LIST OF LOCALLY IMPORTANT BUILDINGS AND STRUCTURES

LL9 Arthur Hill Pool Building constructed in 1911. Is substantially 3<sup>rd</sup> April 2017 221-225 Kings complete, although the original individual Road baths were replaced with one swimming pool Reading and the roof covering of the pool area appears RG1 4LS to be more modern. Greatest significance is in terms of the frontal building (Kings Road), although not great in scale, the intricacy and largely intact frontal building in the Italianate Style makes it a pleasing building of townscape merit. The building has historical association with local philanthropist (through his coal business) Arthur Hill, J.P. was Mayor of the Borough of Reading from 1883-1887. The Arthur Hill Swimming Baths were completed in 1911 in his memory, by his children, as Hill died in 1909. The architect was C B Willcocks and the builder was Robert Curtis. The land was donated by Dr. Jamieson Hurry J.P., who married Hill's daughter and was responsible for the founding of West Reading Library (Grade II)(now Battle Library). Arthur Hill and Octavia Hill, half-sister of Arthur Hill and founder of the National Trust, attended the opening of the building. The building has played an influential role as part of the social well-being of the town by providing the first covered bathing facility in the town, instead of bathing in the Thames or the Kings Meadow Baths (which are open air). Also used by soldiers in wartime and for health reasons, canoe-clubs, and life-saving courses. It shows noteworthy quality of workmanship and materials in an ornate Victorian style: portico, original sash windows, bracketed eaves, decorative brickwork, stone window surrounds, original matching chimneys. Rear section of building has some further interest (arches and columns) but these are not fully revealed. Conrad Birdwood Willcocks was an architect from Caversham, who also worked on Fairmile Hospital, Cholsey (Listed Grade II). He also appears to have been involved in the design of All Saint's Hall (Downshire Square) (Grade II) and appears to have lectured in architecture.