

## READING BOROUGH LOCAL PLAN EXAMINATION NOTE ON DWELLING RANGES IN SITE ALLOCATIONS

### 1. INTRODUCTION

1.1 There was discussion at various points during the hearings for the Reading Local Plan Examination about the indicative dwelling numbers included in the site allocations policies, and whether they were too restrictive. It was requested that the Council provide evidence of where it has applied flexibility in permitting developments with higher numbers of dwellings than in allocations, and that it also consider how possible changes to the Local Plan might seek to address these concerns.

### 2. EVIDENCE OF SITES PERMITTED ABOVE ALLOCATION FIGURES

2.1 The sites listed below were subject to permissions that exceeded the policy figures set out in the relevant development plan at the time of determination.

2.2 The relevant policies in the Sites and Detailed Policies Document can be seen in that document (PP006). The 1998 Local Plan was superseded by the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document and is not therefore on the Core Documents List, but an extract containing the relevant policy is included as Appendix 1.

2.3 Please note that many of the developments that have been permitted and constructed in recent years have been in the town centre on sites identified in the Reading Central Area Action Plan (PP005). For the Major Opportunity Areas, the RCAAP did not set out dwelling numbers, so these would not be included below.

#### **PART OF BRICK KILN SITE, THE MEADWAY**

*Completed, and now known as Chimney Court and Shilling Close*

**Allocation:** Allocated in policy HSG1, site 9 of the 1998 Local Plan for 35 dwellings

**Development:** Permitted and developed for a total of 119 dwellings, under planning permissions 960935, 010352 and 020823.

#### **ELLIOTS/COLLIER & CATLEY, CAVERSHAM**

*Completed, and now 26-46 & 27-49 Patrick Rd, Tamesis Place and Elliots Way*

**Allocation:** Allocated in policy HSG1, site 10 of the 1998 Local Plan for about 80 dwellings

**Development:** Permitted and developed for a total of 133 dwellings, under planning permissions 970663, 980734 and 060196.

#### **AMBROOK ROAD, PART OF GODDARDS FARM ALLOTMENTS, WHITLEY**

*Completed, and now known as Alphington Road*

**Allocation:** Allocated in policy HSG1, site 18 of the 1998 Local Plan for 20 dwellings

**Development:** Permitted and developed for a total of 26 dwellings, under planning permission 930541.

#### **AMERSHAM ROAD ALLOTMENTS, CAVERSHAM**

*Completed, and now eastern end of Amersham Road area including lan Mikardo Way, Nire Road, Managua Close and Honey Meadow Close*

**Allocation:** Allocated in policy HSG1, site 30 of the 1998 Local Plan for about 250 dwellings

**Development:** Permitted and developed for a total of 294 dwellings, under various planning permissions including 950819, 950820 and 960797.

#### **CROMWELL'S, CARDIGAN ROAD**

*Completed, and now known as Forsete Place*

**Allocation:** Allocated in policy HSG1, site 35 of the 1998 Local Plan for 10 dwellings

**Development:** Permitted and developed for a total of 11 dwellings, under planning permission 011039.

#### **LAND OFF ARDLER ROAD INCLUDING MOBILE HOMES SITE**

*Completed, and now known as Hardy Close and Brackstone Close*

**Allocation:** Allocated in policy HSG1, site 90 of the 1998 Local Plan for 50 dwellings

**Development:** Permitted and developed for a total of 56 dwellings, under planning permission 930474 and 949406.

#### **PART OF FORMER BATTLE HOSPITAL**

**Allocation:** Allocated in policy SA8f of the Sites and Detailed Policies Document for a net gain of 45-95 dwellings.

**Development:** Resolution to grant permission subject to signing of a Section 106 agreement for 211 dwellings (net gain of 183), planning application reference 180319.

#### **FORMER ELVIAN SCHOOL, BATH ROAD**

**Allocation:** Allocated in policy SA9b of the Sites and Detailed Policies Document for 70-110 dwellings and education provision.

**Development:** Permitted for development of 118 dwellings and a secondary school, under planning permission 151175. Currently under construction.

### **3. CONSIDERATION OF POTENTIAL CHANGES**

- 3.1 As set out above, the Council has previously permitted applications with dwelling numbers exceeding the figures set out in development plan policy where it has been demonstrated that higher figures are appropriate. For this reason, the Council maintains that its approach is sound and that changes are not necessary.
- 3.2 However, should changes be felt to be necessary, a potential approach is to take all references to development levels (both residential and commercial) out of the policy and include them within a table in the supporting text. An example of how this might affect policy CR13 is shown in Appendix 2, but it would need to be applied to all site allocation policies.
- 3.3 As can be seen, this approach would remove the policy status from the figures whilst ensuring that there are figures within the plan that can be referred to for monitoring and other purposes. However, inclusion of such a table in every section where there are site allocations would serve to lengthen and

complicate the document, and it is not a change that the Council would advocate unless it is felt that the Local Plan would otherwise be unsound.

#### 4. CHANGES TO SPECIFIC ALLOCATIONS

4.1 The Council mentioned on day 6 (3<sup>rd</sup> October) that there were potential changes to the dwelling ranges for two sites in Central Reading that could be considered. It was requested that the note on the indicative dwelling figures should also cover these sites. These potential changes are set out and justified below.

##### **Forbury Business Park and Kenavon Drive (CR13c)**

- 4.2 This site is currently identified for 130-190 dwellings. The reason for this is summarised in the Council's answer to Issue 3, Q3a (see EC005), but in brief it represents the urban density of 81 dwellings per hectare from the Housing and Economic Land Availability Assessment applied to the area of the site not covered by listed buildings.
- 4.3 We have reconsidered this, and agree that it could be regarded as an underestimate. EC005 argues that the density of the site immediately to the east (42 Kenavon Drive) is 77 dwellings per hectare, and the site to the west (Homebase/Toys R Us, which forms part of Forbury Retail Park) is 276 dwellings per hectare, and that site CR13c should be closer to the density of 42 Kenavon Drive. However, it should be noted that the density of 42 Kenavon Drive increases significantly from the terraced housing in the east to the blocks of flats in the west. The western portion of 42 Kenavon Drive, which is the flatted element, is actually built at 130 dwellings per hectare.
- 4.4 It is therefore considered that the density of the western part of 42 Kenavon Drive provides a useful guide to the density of CR13c. The overall density of the wider East Side area is intended to increase from east to west, so it could be argued that CR13c should be a higher density than this, but on the other hand there is a need to avoid negative effects on the setting of the listed buildings to the south and adjacent two storey houses, whilst figure 5.5 of the Local Plan also shows a need to provide on-site open space. The 42 Kenavon Drive development did not provide significant on-site open space as it involved a reliance on an existing area of open space making up part of the older Kennet Walk development. Therefore, 130 dph represents a reasonable guide.
- 4.5 The Council maintains that the density of the Homebase/Toys R Us site is of limited relevance. It does not directly adjoin CR13c, contains a frontage to the Inner Distribution Road, and is closer to the station and the core of the town centre. In addition, it has a substantial south-facing river frontage which means that it can be developed at a high density without impacts on residential properties within the site due to overshadowing.
- 4.6 Using the 130 dwelling per hectare figure applied to the developable part of the site of 1.83 ha means a dwelling figure of 238 dwellings. If the tolerances of 20% on either side are applied, as has been the usual approach for site allocations, this results in a range of 190 to 285 dwellings. The Council would therefore suggest this as a possible change. The owners of the site, Viridis, continue to seek a higher figure than this (up to 500 was quoted during the hearings), and the Council have not therefore sought to agree this with Viridis.
- 4.7 *Summary: change the dwelling range for CR13c from 130-190 to 190-285*

#### **Great Knollys Street and Weldale Street (CR12b)**

- 4.8 The site is currently identified for 280-430 dwellings. The reason for this is summarised in the Council's answer to Issue 3, Q3a (see EC005), but in brief it is based on the town centre fringe density of 200 dwellings per hectare from the Housing and Economic Land Availability Assessment applied to the unpermitted parts of the site and the area not covered by small business units, which are assumed to remain. A Pre-Submission representation was received by Ropemaker Properties stating that there was a higher capacity.
- 4.9 Planning permission was granted on 15<sup>th</sup> March 2018, after consultation on the Pre-Submission Draft had been completed, for a residential development of the part of the site south of Weldale Street for 427 dwellings (reference 170326). Whilst this is just within the range specified, it leaves little scope for development on some of the nearby, albeit much smaller, sites that form part of the allocation. Therefore, it would make sense to amend the upper end of the range so that it included the 427 permitted dwellings plus the development of the remaining developable land (not including small business units) of 0.328 ha in a manner consistent with how the allocation was originally calculated - at 200 dwellings per hectare, with a 20% increase to be consistent with how the upper end of a range is defined elsewhere, which results in 79 dwellings. The upper end of the range would therefore be a total of 506 dwellings. Where figures are in the hundreds, we have generally rounded to the nearest ten, which in this case would be 510. This change is merely to reflect the existing facts of the site.
- 4.10 *Summary: change the dwelling range for CR12b from 280-430 to 280-510*

## APPENDIX 1: LOCAL PLAN POLICY HSG 1

**POLICY HSG 1: HOUSING PROVISION AND IDENTIFIED SITES**

3.14 **PROVISION WILL BE MADE FOR THE DEVELOPMENT OF ABOUT 5,250 DWELLINGS BETWEEN APRIL 1991 AND MARCH 2006 WITHIN THE BOROUGH. THE FOLLOWING SITES HAVE BEEN IDENTIFIED FOR HOUSING DEVELOPMENT OUTSIDE THE TOWN CENTRE AND WILL CONTRIBUTE TO THIS PROVISION.**

<b>SITE</b>	<b>NO. OF UNITS</b>
1 PART OF ROSE KILN LANE, THAMES WATER SITE	75
9 PART OF BRICK KILN SITE, THE MEADWAY	35
10 ELLIOTS/COLLIER & CATLEY, CAVERSHAM PROVISION OF PLAYING FIELD/RECREATION FACILITY	ABOUT 80
14 CITY ROAD, TILEHURST	20
15 LAND AT BLAGDON ROAD (100% AFFORDABLE)	< 40
17 PART OF BATTLE HOSPITAL, OXFORD ROAD (SUBSTANTIAL ELEMENT OF AFFORDABLE)	> 300 (~ 150:1996-2001) *3 (~ 150:2001-2006)
18 AMBROOK ROAD, PART OF GODDARD'S FARM ALLOTMENTS, WHITLEY (100% AFFORDABLE)	20
19 PART OF COURAGES' SPORTS GROUND	65
20 COLEY NURSERY (100% AFFORDABLE)	37
22 ELGAR ROAD	> 10
23 AVENUE SCHOOL	> 50 (1996-2001)
24 ABBOTSMEAD, CAVERSHAM	50
25 LAND AT QUEEN ANNE'S SCHOOL, HENLEY ROAD, CAVERSHAM	95 (1996-2001)
26 WHITLEY WOOD LANE ALLOTMENTS (100% AFFORDABLE)	< 45
27 WHITLEY WOOD ROAD (100% AFFORDABLE)	< 40

**CHAPTER 3: HOUSING**

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<b>30</b>	<b>AMERSHAM ROAD ALLOTMENTS, CAVERSHAM</b>	<b>ABOUT 250 (1996-2006)</b>
<b>31</b>	<b>LAND AT LOWFIELD ROAD, CAVERSHAM (100% AFFORDABLE)</b>	<b>&lt; 25 *1</b>
<b>34</b>	<b>WILTON ROAD LAUNDRY (&gt;50% AFFORDABLE)</b>	<b>&gt; 30</b>
<b>35</b>	<b>CROMWELL'S, CARDIGAN ROAD</b>	<b>&gt; 10</b>
<b>67</b>	<b>PROSPECT HOSPITAL, HONEY END LANE (INCLUDING AFFORDABLE HOUSING)</b>	<b>&gt; 50</b>
<b>72</b>	<b>ELM PARK, NORFOLK ROAD. (IN THE EVENT OF ALTERNATIVE FACILITIES BEING PROVIDED)</b>	<b>&gt; 125</b>
<b>80</b>	<b>LAND AT DEAN'S FARM (50% AFFORDABLE)</b>	<b>56</b>
<b>87</b>	<b>LAND REAR OF NORTHCOURT AVENUE</b>	<b>14</b>
<b>88</b>	<b>MOBILE HOMES SITE, HARTLAND ROAD (100% AFFORDABLE)</b>	<b>34 *1</b>
<b>90</b>	<b>LAND OFF ARDLER ROAD INCLUDING MOBILE HOMES SITE (100% AFFORDABLE)</b>	<b>50 *1</b>
<b>91</b>	<b>MONKS BARN, CRESSINGHAM ROAD (100% AFFORDABLE)</b>	<b>38</b>
<b>93</b>	<b>PSA BUILDING, COLEY PARK</b>	<b>80</b>
<b>94</b>	<b>THAMES WATER RESERVOIR, BATH ROAD</b>	<b>80</b>

**IN ADDITION THE FOLLOWING LARGE SITES HAVE BEEN IDENTIFIED FOR HOUSING DEVELOPMENT IN THE TOWN CENTRE:**

<b>C32</b>	<b>READING TECHNICAL COLLEGE, KINGS ROAD (PHASED FOR PERIOD 2001-2006)</b>	<b>&lt; 150 *2</b>
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**FURTHER SMALL OR MIXED-USE SITES IN THE TOWN CENTRE ARE IDENTIFIED UNDER POLICY CEN 13.**

**WHERE APPROPRIATE RESIDENTIAL DEVELOPMENT WILL NORMALLY BE EXPECTED TO PROVIDE OR MEET THE COST OF NECESSARY AND RELEVANT INFRASTRUCTURE, SERVICES AND ENVIRONMENTAL IMPROVEMENTS.**

Notes \*1: For land supply purposes new units should be calculated as net of existing mobile homes.

\*2: See also paragraphs 8.22.

\*3: See also Policy COM 1 and supporting text.

**Reason for the Policy**

- 3.15 To set out the overall provision for additional housing throughout the Borough during the Plan period and to identify appropriate development sites in order to meet that requirement and the Council's other housing objectives.
- 3.16 The schedule includes all large sites over 1 hectare and selected small sites outside the town centre which the Council has identified for development. In addition to the sites identified above, Policy CEN 13 also identified small (< 1 ha) housing sites and mixed-use schemes within the Town Centre which will contribute to the overall provision.
- 3.17 The sites listed above have been identified for various reasons. For example, many of them are capable of providing affordable family housing for local need. Indeed, several of the sites are owned by the Borough Council and will be developed in conjunction with Housing Associations to meet such needs. In some cases, the existing use on a site is inappropriate in a residential area. In other circumstances land is expected to become surplus to requirements and is suitable for redevelopment, either wholly or partly to provide housing. However, the primary objective of site allocation is to identify and protect the remaining and increasingly scarce supply of suitable housing land in the Borough from pressures from other uses.
- 3.18 Estimated yields from large sites is broadly in line with Structure Plan assumptions and includes a safety margin in the event of a shortfall. As a result there should be no need for the Council to have to consider unsatisfactory development proposals on small sites and unacceptable town-cramming pressures in order to meet the overall housing provision. Certain sites identified are subject to development constraints which mean that they may not be developed until towards the end of the Plan period, and this is reflected in the safety margin referred to above. In particular, the availability of the Elm Park stadium site depends on alternative stadium premises being secured. Site 30 (Amersham Road Allotments) falls partially within the floodplain and flood alleviation works will be necessary prior to development. In the case of site 10 (Elliot's/Collier & Catley) the additional facilities required for Thameside School, comprising a playing field and, if necessary, an extension to the existing playground will also be located on site 10 and not on Christchurch Meadows. The development of some of these larger sites have been broadly phased.
- 3.19 Where a specific proportion of affordable housing provision has already been established, this has been included in the schedule. On sites where no reference is made, the level of affordable housing has yet to be negotiated. (See policy HSG 2).



**How it will be carried out**

- 3.20 Through the Council's development control powers and where appropriate through its powers as landowner. Since the majority of the overall allocation is expected to be met through a flexible combination of small unidentified sites, and large identified sites, the situation may arise where certain large sites are not required to meet that provision or satisfy a five-year land supply. In these circumstances the Council may consider it appropriate to reserve certain large sites for future housing supply. Therefore, the inclusion of a site in this schedule and the accompanying estimated yield does not imply an automatic right to planning permission for that number of units. Consent will be conditional upon other policies in this Plan and the satisfactory resolution of individual site constraints and development principles. Additional guidance will be prepared where necessary. Larger developments may need to be phased in order to allow for the provision of utilities, such as water and sewerage.
- 3.21 The Council recognises that some additional housing sites are likely to come forward during the Plan period. Notwithstanding the primary objective of meeting the overall provision, proposals will also be assessed against the following criteria:
- (a) The ability to provide affordable family housing to meet local need (see policy HSG 2).
  - (b) The removal of an existing use which is inappropriate in a residential area.
  - (c) The conversion of office floorspace to residential use, particularly in the town centre and where it involves vacant space above shops.
  - (d) The need to retain family-sized accommodation in appropriate locations.
  - (e) The criteria in policy HSG 9 and other policies in this Plan.

**POLICY HSG 2: AFFORDABLE HOUSING**

- 3.22 **THE COUNCIL WILL SEEK TO SECURE AFFORDABLE HOUSING TO MEET LOCAL NEED WHEREVER POSSIBLE AND HAS SET A TARGET OF AT LEAST 2000 HOMES WITHIN THE PLAN PERIOD. THE ABILITY OF PROPOSALS TO PROVIDE AFFORDABLE HOUSING, AND ITS SCALE AND TYPE, WILL BE ESTABLISHED THROUGH NEGOTIATION. SUCH PROVISION WILL NORMALLY BE ACHIEVED BY THE INVOLVEMENT OF A HOUSING ASSOCIATION OR SIMILAR BODY, AND SHOULD, THEREFORE, BE SECURED FOR SUCCESSIVE OCCUPIERS.**

## APPENDIX 2: POTENTIAL CHANGE IN APPROACH TO DWELLING RANGES IN SITE ALLOCATIONS - EXAMPLE USING POLICY CR13

### East Side Major Opportunity Area

*VISION: The east side area will be a new community at the eastern fringes of the centre, lending a more urban character to the area, and helping to frame the historic east of the central core.*

#### CR13: EAST SIDE MAJOR OPPORTUNITY AREA

*Development in the East Side Major Opportunity Area will:*

- i) Provide a more defined urban environment than currently exists, of a medium to high density;*
- ii) Contribute towards the provision of a new residential community at the eastern fringes of the central area. Development for education will be acceptable within the site;*
- iii) Help facilitate greater pedestrian and cycle permeability, in particular east-west links through the area and links between development areas and the station, including improved crossings of the IDR and railway;*
- iv) Safeguard land which is needed for mass rapid transit routes and stops;*
- v) Conserve and enhance the listed buildings, scheduled ancient monument and historic garden in the area and their setting where possible;*
- vi) Give careful consideration to the archaeological potential of the area and be supported by appropriate archaeological assessment which should inform the development;*
- vii) Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space;*
- viii) Provide additional areas of open space where possible, particularly in the centre of the new community;*
- ix) Maintain, improve and create new access along the north side of the River Kennet to the Kennet Mouth; and*
- x) Give early consideration to the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.*

Development at Forbury Place and 42 Kenavon Drive is now complete. Development will be in line with the following provisions for each of the remaining sub-areas:

**CR13a, READING PRISON:**

*The prison building itself is of historical significance and is listed, and its historic significance will be conserved and where possible enhanced. The building would be used for residential or student accommodation, commercial offices or a hotel, and should include some cultural or heritage element or related retail and leisure that draws on its significance. The site is part of a scheduled ancient monument, and therefore any additional development will be dependent on a thorough demonstration that it would not have detrimental impacts on the significant archaeological interest. The prison adjoins the Abbey Quarter, and development should therefore enhance that area as a heritage destination.*

Site size: 1.44 ha

~~Indicative potential: conversion of prison could result in 65-90 dwellings. No figures for additional development, as highly dependent on assessment of archaeology.~~

**CR13b, FORBURY RETAIL PARK:**

*This site would be the focus of the new residential community, and, alongside residential, additional retail, leisure and community uses at a scale to serve the Kenavon Drive area would be appropriate. It should include a new area of open space and enhance the frontage to the canal, including a buffer zone to the top of the canal bank to reflect its wildlife significance. Implementing this policy may involve complete redevelopment or using new additional development to improve the existing urban form of the area. Some parts of the site are likely to be implemented in the long term.*

Site size: 6.99 ha

~~Indicative potential: 1,230-1,840 dwellings, no net gain of retail.~~

**CR13c, KENAVON DRIVE & FORBURY BUSINESS PARK:**

*This site would be largely residential in nature, although opportunities to create an area of open space close to the Kennet should be sought. Development will link into the newly-opened pedestrian link under the railway to Napier Road.*

Site size: 2.07 ha

~~Indicative potential: 130-190 dwellings.~~

**CR13d, GAS HOLDER:**

*This area will be used for residential development. Development should enhance the character of the mouth of the Kennet and should maximise the potential of the site to be a river gateway to Reading. Public access along the river will be sought. Development should be set back at least ten metres from the top of the bank of the river and allow for a wildlife corridor along the river. Development should take account of potential contamination on the site.*

Site size: 0.71 ha

~~Indicative potential: 46-70 dwellings.~~

- 5.4.3 The East Side Major Opportunity Area is characterised for the most part by relatively low-density development in fairly prominent positions, including retail warehousing and business and industrial space, as well as the historic local landmark of Reading Prison. The whole of this area is highly visible from the railway line, and it therefore affects the perception of Reading for

people who arrive or pass through by rail. Other aspects which distinguish the East Side from the two other Major Opportunity Areas include the presence of the River Kennet, a more urbanised watercourse than the Thames, along the length of the area, and a cluster of historically significant sites, including the Abbey ruins, Forbury Gardens and the Prison, at the western end of the area. Some redevelopment of former industrial and utilities sites for residential has already taken place in Kenavon Drive in recent years, and the development of 42 Kenavon Drive has recently been completed.

- 5.4.4 ~~Policy CR13 includes s~~Some figures for indicative development capacity are shown below. It should be noted that, to an even greater extent than other areas, development capacity can vary significantly on high density town centre sites, and these figures are therefore an indication only.

<u>CR13a, Reading Prison</u>	<u>Indicative potential: conversion of prison could result in 65-90 dwellings. No figures for additional development, as highly dependent on assessment of archaeology.</u>
<u>CR13b, Forbury Retail Park</u>	<u>Indicative potential: 1,230-1,840 dwellings, no net gain of retail.</u>
<u>CR13c, Forbury Business Park and Kenavon Drive</u>	<u>Indicative potential: 130-190 dwellings.</u>
<u>CR13d, Gas Holder</u>	<u>Indicative potential: 46-70 dwellings.</u>

- 5.4.5 The East Side differs from the other two Major Opportunity Areas in that it is, by the standards of large sites in the centre, relatively self-contained and separate from the commercial core. Whilst the West Side and Station/River are very significant in terms of important routes through the areas, there are fewer routes through the East Side, albeit that there are opportunities to create more permeability through the site for pedestrians and cyclists. Therefore, there is an opportunity to continue to develop much of the east side as a new, reasonable tranquil residential community making up part of the centre, but with a distinct identity. It is important to maximise these opportunities, using design solutions such as home zones, and by providing a high quality public realm.
- 5.4.6 One of the main purposes of the designation of this area as the East Side is the creation of a more urban feel to what is currently a low-density area of buildings which do not relate well to the streets and spaces. Therefore, development should be of a more urban form, for example perimeter blocks.
- 5.4.7 It has already been noted that the East Side is characterised by the presence of the River Kennet and the historically significant sites on the eastern fringes of the centre. These naturally inform the strategy and policy for the area. Some parts of the banks of the Kennet do not currently have public access, so it is important to ensure that new development seizes any opportunities to create new public routes, as well as enhance the waterside environment for ecology purposes. Policy EN11 provides more information. In addition, any development should take account of its impacts on the setting of historic sites, seeking enhancement where appropriate. The prison site offers a particular opportunity to achieve this,

and its integration within the wider Abbey Quarter project offers an opportunity to further enhance this emerging heritage destination.

- 5.4.8 Development in the East Side should also take account of many of the considerations applicable to the other Major Opportunity Areas, such as safeguarding land needed for major transport projects, and facilitating better pedestrian and cycle links. In this instance, east to west links across the IDR are of particular importance. Links across the railway have been improved with the opening of the underpass to Napier Road, but can be further enhanced by providing a high quality approach to this underpass, as well as by public access under the railway at the eastern end of the site. New areas of open space to serve the new community will be required, as will some services and facilities.
- 5.4.9 Figure 5.5 shows the broad strategy for the East Side Major Opportunity Area, which indicates some of the elements that need to be taken into account in developing this area. The Proposals Map gives greater detail on some matters, such as designation of the Major Opportunity Area and Sub-Areas. There are existing Supplementary Planning Documents covering parts of the site. The Reading Prison Framework was recently adopted, and continues to be relevant. Reading Prison is a highly constrained site, and the Framework contains much more detailed information on these issues and how they should be addressed. The Kenavon Drive Urban Design Concept Statement also provides useful guidance, but it predates the Local Plan by some years, so where there is any conflict with policy CR13, the Plan policy takes precedence.
- 5.4.10 Parts of the area may face issues around noise and air quality that will need to be mitigated in relation to new residential development. More information on potential mitigation measures is contained in relation to policy CR6. There is also considered to be a high potential for archaeological finds within the area. Early consultation on these matters will be required. In particular, the location of Reading Prison as part of a scheduled ancient monument means that the substantial archaeological potential is one of the factors to be considered at the very outset of the scheme, and the Reading Prison Framework discusses this in more detail.
- 5.4.30 Parts of the East Side Major Opportunity Area are within Flood Zone 2. A small part is also within Flood Zone 3a. However, this must be weighed against the vital role that these sites will play in regeneration in the centre. A sequential and exceptions test in line with the NPPF has been carried out in identifying these sites for development, and this will be available on the Council's website as background evidence. Individual applications will need to provide their own Flood Risk Assessment. Detailed proposals on these sites will need to consider how the mix of uses is best distributed taking flood risk into account.
- 5.4.31 Sites within this area potentially contain public sewers. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989. Sites CR13a, CR13b and CR13c are also close to a pumping station, and effects on

proposed residential properties as a result of odour, noise and vibration will need to be considered.