

SARSON, EUAN

From: Euan Sarson
Sent: 23 January 2018 22:54
To: Planning Policy
Subject: Draft of Local Plan Section EN7N Item EN7Nn

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

Dear sir/madam,

I have several queries regarding the draft of Local Plan Section EN7N Item EN7Nn:

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
 - a. Traffic movements
 - b. Air pollution
 - c. Noise pollution
 - d. Visual dominance and overbearing on the area of the site where they propose to build
 - e. Privacy and overlooking
 - f. Out of character with local residential properties
 - g. Light pollution
 - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
 - i. Hours of operation
 - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Most importantly, Mapledurham Playing Fields is a very special place to nearby residents; it provides a uniquely green, tranquil space to relax and reflect. It must therefore be protected from anthropogenic development.

Yours sincerely,

Euan Sarson
(A resident of Caversham)

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S.G.N. AND DANESCROFT

Reading Borough Council
 Pre-Submission Draft Local Plan
 November 2017
 Representations Form



Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title		Mrs
First Name		Ellen
Last Name		Timmins
Job Title <i>(if applicable)</i>		Principal Planner
Organisation <i>(if applicable)</i>	SGN & Danescroft	Boyer
Address 1	c/o Agent	Boyer, Crowthorne House
Address 2		Nine Mile Ride
Address 3		
Town		Crowthorne
Post Code		RG40 3GZ
Telephone	c/o Agent	01344 753 090
E-mail	c/o Agent	ellentimmins@boyerplanning.co.uk

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CR13

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please refer to accompanying Statement

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

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B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes No

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Our client’s site forms a significant part of the East Side Major Opportunity Area. It is necessary to participate in order to further discuss the matters raised in our representations, including detailed comments on Draft Policy CR13 and the East Side Major Opportunity Area, as well as other draft policies relating to waterspaces, flooding, housing provision and density.

B7. Do you wish to be kept informed of planning policy matters?

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B1. To which part of the Local Plan does this representation relate?

Policy EN9

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Policy EN11

B2. Do you consider that the Local Plan: (please tick as appropriate)

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Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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B1. To which part of the Local Plan does this representation relate?

Policy EN12

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

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B1. To which part of the Local Plan does this representation relate?

Paragraph 4.2.98 (in reference to Policy EN18)

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Policy H1

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Policy H2

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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B1. To which part of the Local Plan does this representation relate?

Policy CR6

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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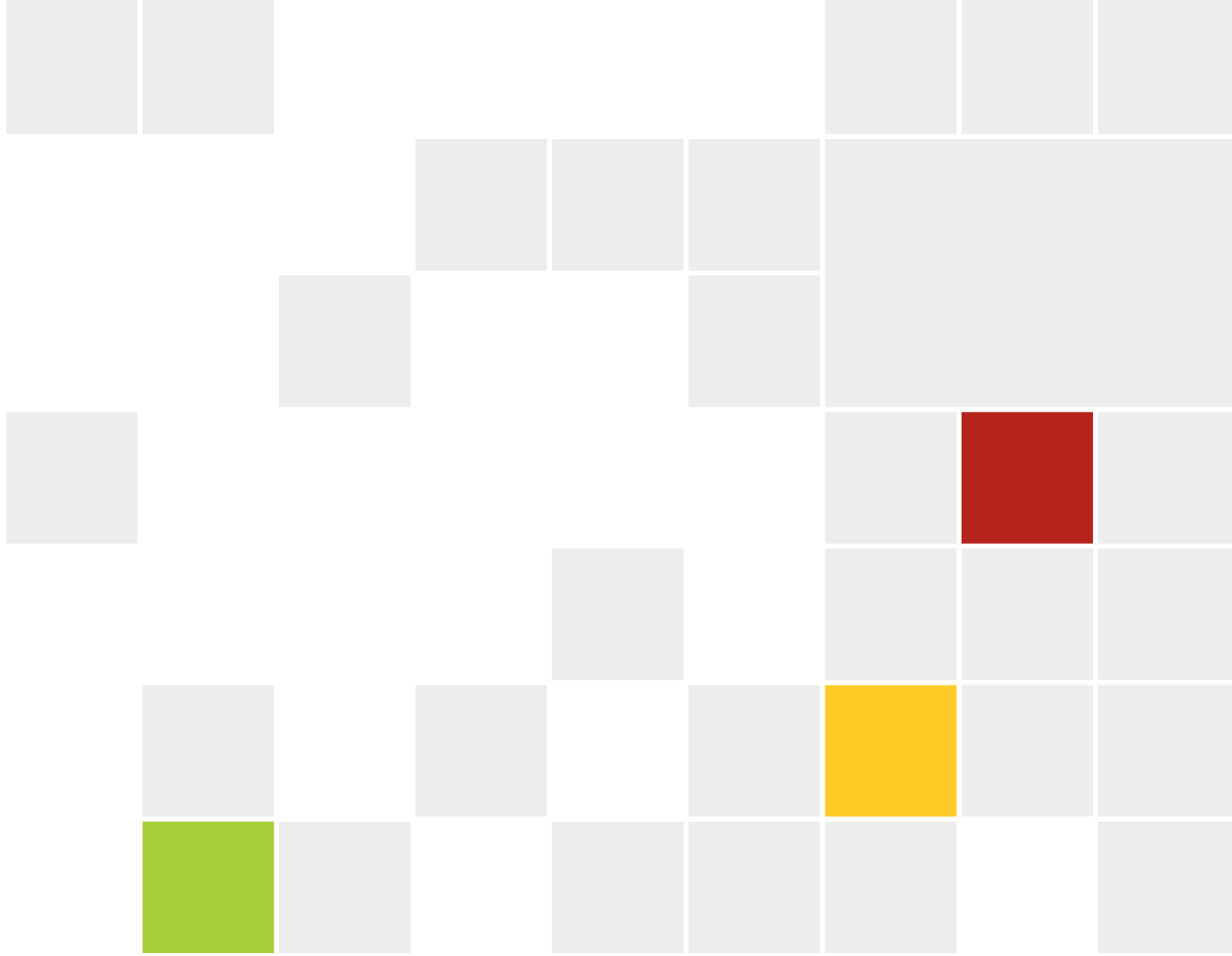
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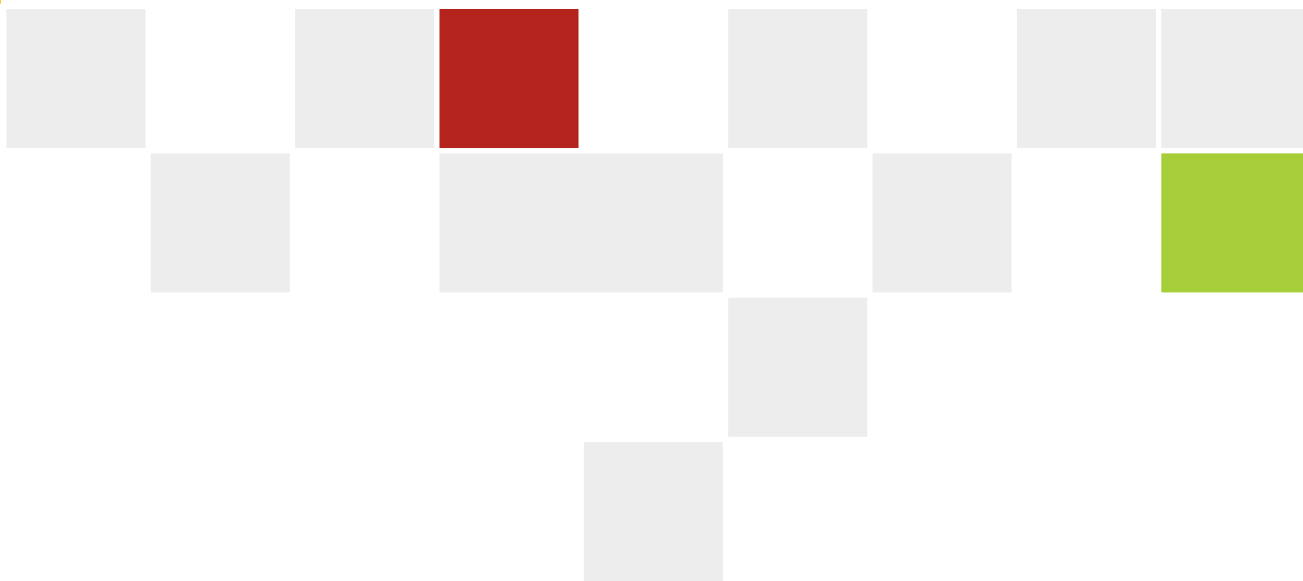
Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:



Reading Borough Council Pre-Submission Local Plan

Representations on behalf of SGN & Danescroft



Boyer

Report Control

Project:	Gas Holder site, Kenavon Drive, Reading
Client:	SGN / Danescroft
Reference:	17.1003
File Origin:	http://lucas/sites/boyer/wokingham/2017/17.1003/4 Boyer Planning/4.02 Reports/Pre-Submission Local Plan/180124 Pre-Submission Local Plan reps Gas Holder - Final.docx
Primary Author	Ellen Timmins
Checked By:	Julia Mountford

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	19/01/2018	Draft v1	JM
2	24/01/2018	Draft v2	JM
3	24/01/2018	Final	JM

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1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of SGN Commercial Services Limited ('SGN') as advised by Danescroft (Kenavon Drive Project Management) LLP ('Danescroft') in response to Reading Borough Council's Pre-Submission Draft Local Plan consultation, which runs from 30 November 2017 until 5pm on 26 January 2018.
- 1.2 This Statement follows on from our previous representations on the Draft Local Plan (June 2017). We very much welcome the publication of the Pre-Submission Plan and commend the Council for progressing the Plan in a timely manner.
- 1.3 SGN is the freeholder of land known as the 'Gas Holder' site which is currently operated by SGN as part of their gas infrastructure. The site is accessed via Kenavon Drive and what is now Robert Parker Road. This land has been designated for residential development under emerging Policy CR13(d), Gas Holder.
- 1.4 Focussed on residential and mixed use opportunities in Greater London and the South-East, Danescroft has established a considerable track record in negotiating complex planning permissions. They have particular expertise in working with landowners, local authorities and stakeholder groups to maximise the development potential and value of a variety of brownfield and greenfield opportunities.
- 1.5 These representations are structured to respond to a number of policies within the Pre-Submission Draft Local Plan as well as specific elements of the various evidence base documents which are also available for consultation, including:
 - Sustainability Appraisal of the Pre-Submission Draft Local Plan (November 2017);
 - Reading Infrastructure Delivery Plan (November 2017);
 - Reading Housing and Economic Land Availability Statement – Volumes I and II (November 2017); and
 - Reading Borough Local Plan Duty to Co-Operate Statement (November 2017).
- 1.6 Section 2 of this Statement provides an overview of national planning policy relevant to the preparation of Local Plans and the delivery of new housing.
- 1.7 Section 3 then provides a description of the site and surrounding area by way of context, and then Section 4 focusses on Draft Policy CR13 and the East Side Major Opportunity Area, in particular CR13(d) relating to the Gas Holder, which is proposed to be allocated for c.46-70 dwellings.
- 1.8 Section 5 then provides comments on a number of other draft policies relevant to the site, including:

General Policies:

- Policy EN9 – Provision of Open Space
- Policy EN11 – Waterspaces

- Policy EN12 – Biodiversity and the Green Network
- Policy EN18 – Flooding and Drainage
- Policy H1 – Provision of Housing
- Policy H2 – Density and Mix

Central Reading:

- Policy CR6 – Living in Central Reading

1.9 Section 6 then provides a summary and conclusion.

1.10 Notwithstanding the representations included within this Statement, SGN reserves the right to comment on any other policies not commented upon here during future stages of consultation on the Local Plan following its submission to the Secretary of State.

2. NATIONAL POLICY CONTEXT

- 2.1 This section provides a brief review of the approach which local planning authorities are required to take in preparing Local Plans for their areas, with particular reference to planning for their identified housing requirements.
- 2.2 The National Planning Policy Framework (NPPF) (2012) provides the overarching Government policy document in relation to planning.
- 2.3 The NPPF requires Local Plans to be *“prepared with the objective of contributing to the achievement of sustainable development”* (paragraph 151). As such paragraph 154 states that Local Plans *“should address the spatial implications of economic, social and environmental change”*. They should set out *“the opportunities for development and clear policies on what will or will not be permitted and where”*.
- 2.4 Local Plans should be drawn up over an appropriate timescale. Preferably this will involve a 15-year time horizon but also taking into account longer term requirements.
- 2.5 The NPPF establishes the *‘presumption in favour of sustainable development’* in paragraph 14, which in particular for plan-making means that:

“Local planning authorities should positively seek opportunities to meet the development needs of their area.”

Housing Provision

- 2.6 One of the key objectives of the NPPF, set out in paragraph 47, is to *“boost significantly the supply of housing”*. In order to achieve this aim, the Local Planning Authority should:
- “Use their evidence-base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.”*
- Delivering a wide choice of high quality homes*
- 2.7 The Government’s ambition is to boost significantly the supply of housing. Paragraph 47 of the NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements, with an additional 5% to 20% buffer depending on past performance of delivery. Local planning authorities need to provide a realistic prospect of achieving planned supply and to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and where possible for years 11-15.

- 2.8 In addition paragraph 17 states that every effort should be made objectively to identify and then meet the housing needs of the area. Local Planning Authorities are required to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.
- 2.9 Paragraph 50 of the NPPF deals with the need to deliver a wide choice of high quality housing, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It sets out three specific points. The first is to plan for a mix of housing based on current and future demographic trends and needs of different groups. The second point is for a Local Authority to identify size, type and tenure as well as the range of housing required in particular locations reflecting local demand. The last point is where affordable housing is required, to set policies for meeting that need on site.

Tests of Soundness

- 2.10 The four tests of soundness against which a Local Plan will be examined by an Inspector are set out in paragraph 182 of the NPPF.
- 2.11 In order to be considered sound, a Local Plan should be:
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic properties; and
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

3. SITE AND SURROUNDING AREA

- 3.1 The Gas Holder site, situated at the end of Kenavon Drive, forms the far eastern corner of the 'East Side Major Opportunity Area' (MOA) in the Reading Central Area Action Plan (AAP) (2009). The area is situated within the eastern part of Reading town centre, to the east of the A329 Inner Distributor Road (IDR) and is accessed via Kenavon Drive.
- 3.2 The site is occupied by a single Gas Holder, some ancillary buildings, a water tower and an area of hardstanding. The site is broadly triangular in shape and is bounded by the River Kennet to the south, by the railway to the north, and by the recent development immediately adjoining the western side of the site formerly known as 42 Kenavon Drive. That site was granted planning permission for the erection of 192 dwellings with associated access, parking, landscaping and open space in 2013 under application reference 131280 and is currently nearing completion (now known as Robert Parker Road).
- 3.3 The Gas Holder site is currently owned and operated by SGN, however the Gas Holder has been taken out of service and so is no longer in use. The Gas Holder occupies the majority of the site's area, and the existing buildings and hardstanding currently remain in use as a depot for SGN, where vehicles and materials are stored. The site is fully operational and will remain so unless a viable planning permission for a change of use is achieved.
- 3.4 As with many others across the country, the Gas Holder itself had become too expensive to maintain given its age. More modern techniques, such as line packing, are also gradually replacing the storage capacity previously provided by gas holders. Line packing involves storing gas within the existing pipe infrastructure. This has become possible as the quality of pipes has been improved over time.
- 3.5 The hazardous substances consent for the Gas Holder was revoked at the end of 2012. The previous consultation zones associated with the hazardous substances consent around the Gas Holder have therefore been removed. There is no prospect of the Gas Holder being brought back into use as part of the network in the future or its adaptation for alternative uses.
- 3.6 The potential for site contamination is understood to be significant and it is anticipated that extensive remediation works would be necessary before any redevelopment of the site for any use could be carried out. There remains some underground gas infrastructure which can be diverted and stopped up as part of a redevelopment plan for the site.
- 3.7 The site is also understood to be close to an existing hazardous pipeline, however this is associated with the previous use of the Gas Holder and there would no longer be a need for the pipeline once the site is redeveloped for an alternative use.
- 3.8 Part of the site falls within the Reading Air Quality Management Area (AQMA) due to its proximity to the railway line where it passes through the built-up area. The site also falls within Flood Zone 2.

- 3.9 The principle of redevelopment of the site for residential use has been established in adopted planning policy for a number of years. Policy RC3f of the Reading Central AAP relates specifically to the Gas Holder and states that:

“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.”

- 3.10 In terms of the surrounding area and rest of the East Side MOA, the development of 42 Kenavon Drive is now nearing completion as highlighted above, having been redeveloped by Bellway Homes for 192 new homes. In recent weeks the Borough’s Planning Committee has also resolved to grant full planning permission for 765 flats up to a maximum of 11 storeys on the Toys R Us and Homebase site at Kenavon Drive, following an application made by L&Q last year.

4. POLICY CR13: EAST SIDE MAJOR OPPORTUNITY AREA

- 4.1 The Council's vision for the East Side Major Opportunity Area (MOA), as set out within the Pre-Submission Draft Local Plan, is for 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. The first part of Policy CR13 therefore sets out a number of overarching criteria for all new development in the East Side MOA, followed by specific provisions for each of the remaining sub-areas.

Policy CR13(d): Gas Holder

- 4.2 Draft Policy CR13(d) relates to the Gas Holder and states that:

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 to the Kennet Mouth will be sought. Development should be set back at least ten metres from the river and allow for a wildlife corridor along the river. Development should take account of potential contamination on the site.

Site size: 0.71ha

Indicative potential: 46-70 dwellings.

4.3 The allocation of the site for residential development is strongly supported.

- 4.4 The only change from the Regulation 18 version of the plan is the need to take into account of potential contamination on the site, which is supported.

- 4.5 To ensure the soundness of the plan however, a number of comments are made below on the policy as currently worded and the indicative site capacity included within the Pre-Submission Draft Local Plan. Some of these points have been taken forwards from our previous representations where we consider there are still valid reasons for amendments to be made to the Plan as currently drafted.

Site Capacity

- 4.6 CR13(d) includes an indicative development potential of 46-70 dwellings. Supporting paragraph 5.4.23 however notes 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".

- 4.7 This flexibility is welcomed, as in this instance it is considered that the Gas Holder site is capable of accommodating up to 120 dwellings. It is therefore considered that the estimated capacity of 46-70 dwellings in CR13(d) represents a conservative indication of the development potential of the site. As discussed further below, it is also unlikely that a development of the scale indicated in the Pre-Submission Local Plan would be viable. The indicative capacity should therefore be increased in order to support the change of use envisaged by the Council in adopted and emerging policy.
- 4.8 The Council reports in its *'Statement of Consultation on the Draft Local Plan'* (November 2017) that the Council *"has used a methodology that is consistent across the Borough"* when determining the indicative capacity of each site. The indicative potential of 46-70 dwellings referenced in the Pre-Submission Draft Local Plan is derived from the Housing and Economic Land Availability Assessment (HELAA) (November 2017).
- 4.9 The HELAA uses a number of ways to estimate the development potential for particular sites. For sites with planning permission, the development set out in the permission is taken as being the potential of the site. For other sites, one of the following two approaches was used (paragraphs 3.5-3.8 of the HELAA refer):
- Either a standard 'pattern book' approach was used, using average densities from examples of recent development, based on broadly categorising areas of the Borough into town centre, urban, suburban and rural areas; or
 - The development potential was calculated on a site-by-site basis, taking account of matters such as the likely acceptable development heights, plot coverage and possible mix of uses.
- 4.10 In the case of the Gas Holder (HELAA ref: AB016), an estimated development capacity of 58 dwellings was derived using the pattern book approach, rather than a site-specific manual calculation. The Council has then applied a buffer of $\pm 20\%$ to this figure, resulting in the indicative potential of 46-70 dwellings set out in the Draft Local Plan.
- 4.11 Whilst no objection is raised to the 'pattern book' approach used in the HELAA in principle, for the reasons set out below it is considered that the Gas Holder is a site for which it would be more appropriate to utilise the site-specific manual calculation method for calculating development capacity.
- 4.12 Firstly, the Gas Holder site is located at a prominent location in the east of Reading. Supporting paragraph 5.4.22 recognises that the East Side MOA is *"highly visible from the railway line, and it therefore affects the perception of Reading for people who arrive or pass through by rail"*. Given its location, the Gas Holder site is the first part of the central area that is visible for people arriving from the east by rail, from both the London Waterloo and Paddington railway lines. This is confirmed in the Sustainability Appraisal, which notes that *"the [Gas Holder] site is prominent on entry to Reading by train, and a beneficial development might therefore have positive economic effects"*. Due to its location next to the River Kennet, the policy itself also recognises the potential of the site to be a *"river gateway"* to Reading.

- 4.13 For these reasons the site lends itself to a development which acts as both a rail and river gateway to Reading. It is a visually prominent site and by its very nature lends itself to a higher density development, subject to satisfying all other development management policy requirements.
- 4.14 Initial design options suggest that the site could accommodate a development of several apartment buildings, which would step up in height from existing development along Kennet Walk and Robert Parker Road (the new development at the site formerly known as 42 Kenavon Drive), and increase to up to eight storeys in height towards the mouth of the River Kennet. This would maximise the potential of the site to be a river gateway to Reading, as envisaged in the draft Policy, whilst having appropriate regard to the character of its surroundings and residential amenity of both existing and future residents.
- 4.15 Based on an initial design feasibility exercise it is envisaged that, through such a design, the site could accommodate between 100 and 120 dwellings.
- 4.16 Allocating the site for more dwellings would help ensure the requirements of the NPPF are met in terms of achieving sustainable development, positively seeking opportunities to meet the development needs of an area and helping ensure the efficient use of land. Given Reading is currently falling short of meeting its OAN, it is important that the most efficient use of available sites is made. Increasing the indicative capacity for the allocation would help achieve this and help ensure the soundness of the plan.
- 4.17 It is therefore considered that the indicative site capacity in the Local Plan should be increased to between 100 and 120 dwellings.
- 4.18 Irrespective of whether the capacity is increased however, the Council confirms that the dwelling figures are indicative only. The draft Local Plan therefore does not preclude the development of the site for more than 46-70 dwellings provided it can be demonstrated via the planning application process that this can be accommodated in an appropriate manner.
- 4.19 The Council's express confirmation of this is particularly important for commercial reasons in respect of viability, as discussed below.

Viability considerations

- 4.20 The desire for the Gas Holder site to be redeveloped as part of the East Side MOA has been established in local planning policy for a number of years. Firstly within the Kenavon Drive Urban Design Concept Statement (UDCS) (2004), then the Core Strategy (2008), Reading Central Area Action Plan (2009), and now the Draft Local Plan (2017).
- 4.21 As the Council will be aware however, the costs of redeveloping a site such as this are not insignificant, due primarily to the costs associated with dismantling the gas holder and decontamination of the site itself. This would prohibit a traditional lower density residential scheme from being a viable alternative.

- 4.22 It is noted that the Pre-Submission Draft Local Plan suggests the development capacity of the site is indicative only at this stage. Whilst the flexibility that this provides is supported, it is preferable that the site is allocated for residential use of sufficient value within the emerging Local Plan to ensure that redevelopment is viable, in order to give certainty to the landowner, developer and all other local stakeholders going forwards. This will ensure that redevelopment of the site occurs relatively early in the Plan period.
- 4.23 The Local Plan currently refers to the delivery of the site in the medium term (years 2021-26). It is considered that the site has potential to start delivering new homes before 2021, and so it is assumed that the site would not be prevented from coming sooner forward if it were possible. Subject to the allocation being increased, the assumptions made within the Council's housing trajectory at Figure 10.1 of the Draft Local Plan are supported.
- 4.24 Overall, it is therefore considered that the indicative capacity of the Gas Holder site should be increased from 46-70 dwellings to 100-120 dwellings, to reflect the prominent location of the site; its redevelopment potential as a rail and river gateway to Reading; and the need to ensure the site is allocated for a residential use of sufficient value to ensure the site comes forward for redevelopment, as desired in both existing and emerging policy.**

Public Access to the River

- 4.25 Whilst the principle of providing public access along the river is supported within the Gas Holder site itself, some areas of land required to provide a continuous pedestrian connection "to the Kennet Mouth" beyond the Gas Holder site to the north-east (as indicated by the dotted purple line on Figure 5.5.) fall in separate ownership to the Gas Holder site itself. Such connections would therefore fall outside the control of the landowner and/or subsequent developer.
- 4.26 Continuous public access along the northern side of the River Kennet up to the Kennet Mouth would also require the existing railway to be crossed twice, as the Waterloo and Paddington lines have already started to diverge by this point. The Council consider that this "public access could be created under existing railway bridges using existing openings, so new tunnels and bridges are not required".¹
- 4.27 It is recognised that continuous public access to the Kennet Mouth is an important policy aspiration. However, this should be reflected in the criteria for all new developments in the East Side MOA as a whole at the outset of the policy, rather than as part of the specific policy requirements for the Gas Holder.
- 4.28 For instance, criterion (ix) currently states that developments in the MOA will "(ix) Maintain, improve and create new access along the north side of the River Kennet". It is recommended that this instead be amended to "(ix) Maintain, improve and create new access along the north side of the River Kennet, with a view to providing a continuous pedestrian connection to the Kennet Mouth" (new text underlined).

¹ 'Statement of Consultation on the Draft Local Plan' (RBC, November 2017)

- 4.29 For clarity and consistency, Policy CR13(d) should therefore only refer to the provision of public access along the river within the site itself. The Council has acknowledged that some of the necessary land is outside the control of the landowner.² It is therefore not justified to solely require the Gas Holder site to contribute to the additional connection from the edge of the site up to the Kennet Mouth. Other sites within the East Side MOA must share the responsibility as the continuous pedestrian connection is an aspiration for the whole MOA allocation, not just the Gas Holder.

Wildlife Corridor

- 4.30 In terms of the requirement that development be set back a minimum of 10 metres from the river, the new clarification as to what is meant by ‘development’ in the supporting text to Policy EN11 ‘Waterspaces’ is welcomed (paragraph 4.2.50 refers).
- 4.31 Fundamentally however, given the obvious implications for developable areas, it remains unclear how the proposed set back of 10 metres has been derived. The Council states that “10 metres is not particularly significant in the context of the development site, and it is considered that it should be achieved wherever possible”,³ however no further evidence has been referenced which justifies the 10 metre figure. As such this requirement is unjustified and the policy is therefore unsound as currently drafted.
- 4.32 It is considered that a reduced set back would still allow the creation of a wildlife corridor along the river, whilst ensuring a more effective and efficient use of land. This is particularly important on previously developed sites within the urban area such as this, as encouraged by paragraph 17 of the NPPF, particularly given the significant costs associated with redeveloping sites such as this.

Proposed Revised Wording of Policy CR13(d)

- 4.33 For the reasons discussed above, it is therefore considered that the wording of Policy CR13(d) should be amended as follows (new text underlined, deleted text ~~struck through~~):

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 to the Kennet Mouth within the site will be sought. Development should be set back ~~at least ten metres~~ from the river in accordance with Policy EN11 and allow for a wildlife corridor along the river. Development should take account of potential contamination on the site.

Site size: 0.71ha

Indicative potential: ~~46-70~~ 100-120 dwellings.

² *Statement of Consultation on the Draft Local Plan’ (RBC, November 2017)*

³ *Statement of Consultation on the Draft Local Plan’ (RBC, November 2017)*

5. OTHER POLICIES

General Policies

Policy EN9 – Provision of Open Space

- 5.1 Draft Policy EN9 provides for public open space in residential developments of over 50 dwellings. It is not clear however whether the policy as currently drafted specifically requires *on-site* provision for residential developments of over 50 dwellings, or whether it will be considered appropriate in some circumstances to make a contribution towards off-site provision / improvements.
- 5.2 This may be more suitable on some sites in the Central Area for instance, where existing site constraints and limited developable areas etc. may prevent satisfactory provision of children's play areas and neighbourhood parks. It may be that the policy is drafted this way to provide flexibility for this exact reason, however if that is the case this should be set out more explicitly to avoid confusion.
- 5.3 Further clarification is therefore required to ensure it is applied consistently for development management purposes. Without further clarification draft Policy EN9 is not currently effective and is therefore unsound.

Policy EN11 – Waterspaces

- 5.4 The amendments that have been made to draft Policy EN11 following our previous representations are welcomed and supported.
- 5.5 As highlighted in our response to draft Policy CR13(d) however, it is not clear how the requirement that development "*be set at least ten metres back from the watercourse wherever practicable and appropriate to protect its biodiversity significance*" (our emphasis) has been justified.
- 5.6 There is no reference within the evidence base of the Pre-Submission Local Plan as to how a figure of 10 metres has been arrived at in determining what an appropriate set back from the watercourse should be in order to protect its biodiversity significance. This requirement is therefore currently unjustified and consequently the policy is unsound.
- 5.7 It is considered that a reduced set back would still allow the creation of a wildlife corridor along the river, whilst ensuring a more effective and efficient use of land. This is particularly important on constrained previously developed sites within the urban area as encouraged by paragraph 17 of the NPPF, such as the Gas Holder.

Policy EN12 – Biodiversity and the Green Network

- 5.8 The amendment that has been made to the Proposals Map to include reference to Policy EN12 in the Key is welcomed and supported.

- 5.9 To ensure the soundness of the Policy, the following minor amendments are recommended (new text underlined), to ensure it provides sufficient flexibility and to recognise that some developments may offer opportunities to positively affect the identified Green Network:

EN12: BIODIVERSITY AND THE GREEN NETWORK

a) The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network. The Green Network comprises:

- Sites with identified biodiversity interest - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, Priority and Biodiversity Action Plan habitats, and the River Thames and all its tributaries (including the River Kennet and the Kennet & Avon Canal); and*
- Areas with potential for biodiversity value and which stitch the Green Network together – designated Local Green Space and open green spaces, and existing and potential Green Links.*

New development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation wherever practicable. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.

b) On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:

- Protect and where possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals where practicable; and*
- Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) where practicable.*

In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is “no net loss” of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats, and should be provided prior to occupation of new development.

Policy EN18 – Flooding and Drainage

- 5.10 In our previous representations on the Draft Local Plan (June 2017), we queried whether the Council had already prepared a Sequential and/or Exceptions Test to inform the Draft Local Plan, in accordance with the NPPF.
- 5.11 The Pre-Submission Local Plan now confirms at paragraph 4.2.98 that these have *“already been carried out for those sites allocated within this plan, and there is no need for this to be repeated unless development would differ from the allocation.”* Footnote 64 indicates that the sequential and exceptions test is *“Available on the Council’s website”*; however at the time of writing we have not been able to locate this to review it as part these representations. It is essential however that this be submitted as part of the supporting evidence base for the new Local Plan when it is submitted for examination, to ensure the proposed allocations can be found sound.
- 5.12 It should also be clarified as to what is meant by the reference in supporting paragraph 4.2.98 that *“...there is no need for this to be repeated unless development would differ from the allocation”*. There would only be a need for the sequential and/or exception test to be repeated if the proposed *use* (and/or flood risk vulnerability classification) of an allocated site differs from that for which it is allocated, rather than, for instance, the scale of development being higher than the indicative capacity for the relevant allocation.
- 5.13 We therefore suggest this sentence is amended to (new text underlined, deleted text ~~struck through~~):

“...there is no need for this to be repeated unless the proposed use and/or flood risk vulnerability classification ~~development~~ would differ from the allocation”

Policy H1 – Provision of Housing

- 5.14 Draft Policy H1 makes provision for a minimum of 15,433 additional homes in Reading Borough for the period 2013 to 2036, which represents a shortfall of 644 dwellings when considered against Reading’s objectively assessed need (OAN) of 16,077 homes, as identified in the Berkshire SHMA (2016). Paragraph 4.4.5 suggests that this will need to be accommodated elsewhere within the Western Berkshire Housing Market Area (HMA).
- 5.15 It is recognised that there may be issues with Reading’s ability to accommodate its need within its own boundaries which might prevent the Borough from meeting its full OAN. One of the core planning principles set out in paragraph 17 of the NPPF however is that *“every effort should be made objectively to identify and then meet the housing ... needs of an area, and respond positively to wider opportunities for growth (our emphasis)”*.
- 5.16 To this end the HELAA tests alternative scenarios in order to test to what degree densities would need to be increased in order to eliminate this shortfall, however this concluded that a 50% uplift in densities would be required ‘across the board’ for all identified sites. This was not considered appropriate for a number of reasons, as detailed in the HELAA.

- 5.17 For the reasons set out in Section 4 however, it is considered that the Gas Holder site is capable of accommodating a higher number of dwellings than the Pre-Submission Draft Local Plan currently envisages. Increasing the allocation of the Gas Holder site to a minimum of 100 dwellings would help to increase the number of new homes that can be provided for in Policy H2. This would provide a modest reduction to the identified shortfall compared to the OAN, and thus reduce the number of new homes that surrounding authorities in the Western Berkshire HMA are expected to accommodate.
- 5.18 Whilst it is recognised that this would only have a modest impact on the Council's housing shortfall (between 30 and 74 dwellings, or between 4.7% and 11.5%), this could make the difference between whether or not a neighbouring authority is required to allocate an additional site (or more) for development.

Policy H2 – Density and Mix

- 5.19 The changes made to clarify the requirements in draft Policy H2 in respect of self-build plots following our previous representations on the Draft Local Plan (June 2017) are welcomed and supported. In particular the confirmation that self-build plots apply to houses only, that the requirement is linked to the self-build register (rather than a target percentage), and that any unsold plots can revert to the developer after 12 months of marketing.

Central Reading

Policy CR6 – Living in Central Reading

- 5.20 This policy sets out a number of detailed criteria which proposals for residential development within the central area will be assessed against.
- 5.21 In particular, on developments of 15 dwellings or more, the policy states that, “*as a guide*”, a maximum of 40% of units should be 1-bed/studios and a minimum of 5% of units should be at least 3-bed “*unless it can be clearly demonstrated that this would render a development unviable*”. The flexibility that has been accordingly built into this policy is supported and welcomed,
- 5.22 The Local Plan is intended to cover the period up to 2036. Whilst the guidance on housing mix that will be expected by the Council is helpful, it may not necessarily reflect the mix requirements in the future whilst the Local Plan is still in place.

- 5.23 To ensure the policy is adaptable to changing conditions and remains effective over the whole plan period, the following amendments are therefore proposed (new text underlined):

CR6: LIVING IN CENTRAL READING

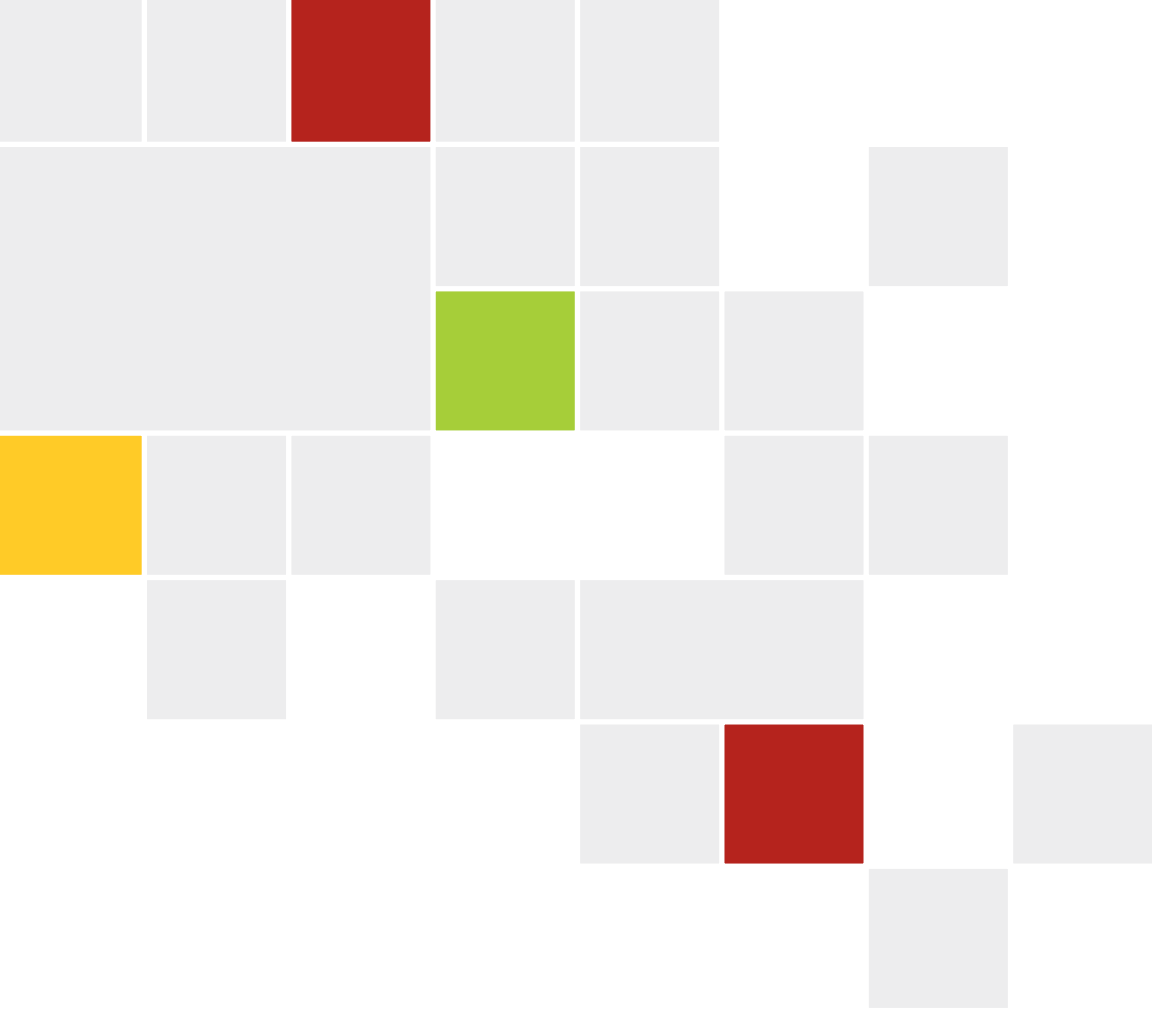
Proposals for residential development within the central area will be assessed against the following criteria:

i) All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/studios, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable or would fail to meet current market demand.

ii) (...)

6. SUMMARY

- 6.1 These representations have been prepared by Boyer on behalf of SGN Commercial Services Limited as advised by Danescroft (Kenavon Drive Project Management) LLP in respect of Reading Borough Council's Pre-Submission Draft Local Plan consultation.
- 6.2 SGN Commercial Services Limited is the freeholder of land known as the 'Gas Holder' site which is currently operated by SGN as part of their gas infrastructure. The 'Gas Holder' site accessed via Kenavon Drive and what is now Robert Parker Road. This land has been designated for residential development under emerging Policy CR13(d), Gas Holder.
- 6.3 These representations focus primarily on Draft Policy CR13 and the East Side Major Opportunity Area, in particular CR13(d) relating to the Gas Holder, which is proposed to be allocated for c.46-70 dwellings.
- 6.4 **The following points provide an overview of the main issues identified in the representations and aim to succinctly set out the position, in that SGN:**
- **Continue to support the allocation of the Gas Holder site for residential development as part of the continued development of the East Side Major Opportunity Area, although minor amendments are proposed to the policy wording to ensure its soundness;**
 - **Recommend that the indicative capacity of the Gas Holder site be increased to 100-120 dwellings, to reflect:**
 - **the prominent location of the site;**
 - **its potential to provide a gateway building given the site's position adjoining key rail and river connections into Reading; and**
 - **the need to ensure the site is allocated for a residential use of sufficient value to ensure that redevelopment is viable.**
- 6.5 Comments have also been made on a number of other draft policies relating to waterspaces, flooding, housing provision and density in the interests of soundness.
- 6.6 These representations are therefore duly made regarding the proposed residential development of the Gas Holder site.



Boyer

Crowthorne House, Nine Mile Ride, Wokingham, RG40 3GZ | 01344 753 220
wokingham@boyerplanning.co.uk | boyerplanning.co.uk

SHABANI, JENNIFER

From: jenny shabani
Sent: 25 January 2018 17:26
To: Planning Policy
Subject: Subject: Draft Local Plan Section EN7N Item EN7Nn Mapledurham Playing Fields

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

To whom it may concern:--

My name is Jennifer Shabani and I am a local Reading resident. I have just read the draft Local Plan Section EN7N Item EN7Nn and would like to voice my objection EFA's proposal to building of the Heights Primary School on Trust land at Mapledurham Playing Fields.

Prior to that I have re-read the report by the Director of Environment and Neighbourhood Services to the Heights Free School Sub-committee dated 11th October 2016. This report is not particularly favourable to the school proposal and there were clearly reservations.

In regard to the the draft Local Plan Section EN7N item EN7Nn, whatever happened to RBCs commitment to green open spaces for the benefit of local residents to foster their well being? Why has his been dropped to try to accommodate the EFA's proposal? Not only is green space being lost and not being replaced by equivalent alternative sites, the plan to break a charitable trust set up solely for recreation not education is not acceptable.

The ESA's proposal not only goes against RBCs own draft Local Plan, but would have a negative impact on the surrounding environment in terms of increased traffic movements and resulting raised levels of air pollution. The idea that most families would walk with their children to the proposed school is an unknown and not very likely. The number of school aged children is actually falling and the bulge years are temporarily over. This site was never meant for a school and could be needlessly ruined. .

Should the school be built, what about the many years to come. Any short term financial investment would soon dry up and what then?

RBC points out the lack of sufficient open green spaces north of the river, so why take away any? having said that, I was interested to read that bugs bottom actually has more open green space. I would also very much like to know what happened to the section 106 money which developers paid when those houses were built. There must have been a very substantial amount of money paid. Where did this go as no school, health centre was built?

I have so far found RBC biased in their treatment of this case and was particularly alarmed about the lack of democracy when the chair of a public meeting forbids the members of the Height Free School Committee to answer questions. I never thought i would witness such a thing.

Nothing in any of this process has given me confidence that justice will be done and I fear for the future.

Jennifer Shabani

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SHERWOOD, NIAMH

From: Niamh Sherwood
Sent: 24 January 2018 16:59
To: Planning Policy
Subject: Draft Local Plan Section EN7N Item EN7Nn

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

Dear Sirs

With reference to the draft Local Plan Section EN7N Item EN7Nn, please can you answer the following questions:

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?

2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?

3. In particular, how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
 - a. Traffic movements
 - b. Air pollution
 - c. Noise pollution
 - d. Visual dominance and overbearing in the area of the site where they propose to build
 - e. Privacy and overlooking
 - f. Out of character with local residential properties
 - g. Light pollution
 - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
 - i. Hours of operation
 - j. Reduction in the quality of the environment

4. What plans are there to demonstrate a commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Kind Regards,

Niamh Sherwood

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SHERWOOD, ROBERT

From: Robert Sherwood
Sent: 26 January 2018 15:06
To: Planning Policy
Subject: Fwd: Draft Local Plan Section EN7N Item EN7Nn

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

Dear Sirs

With reference to the draft Local Plan Section EN7N Item EN7Nn, please can you answer the following questions:

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?

2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?

3. In particular, how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
 - a. Traffic movements
 - b. Air pollution
 - c. Noise pollution
 - d. Visual dominance and overbearing in the area of the site where they propose to build
 - e. Privacy and overlooking
 - f. Out of character with local residential properties
 - g. Light pollution
 - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
 - i. Hours of operation

j. Reduction in the quality of the environment

4. What plans are there to demonstrate a commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Kind Regards,

Robert Sherwood

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SLOUGH BOROUGH COUNCIL

Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices, Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	Paul	
Last Name	Stimpson	
Job Title <i>(if applicable)</i>	Planning Policy Lead	
Organisation <i>(if applicable)</i>	Slough Borough Council	
Address 1	St Martins Place	
Address 2	51 Bath Road	
Address 3		
Town	Slough	
Post Code	SL1 3UF	
Telephone	01753 87 5820	
E-mail	paul.stimpson@slough.gov.uk	

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Spatial Strategy

1.1 Slough supports the principles of the spatial strategy summarized in 3.2.1 as the most sustainable approach to meeting development needs.

Meeting Objectively Assessed Housing Need

1.2 Reading objectively assessed housing need is 16,077, Policy H1 states that only 15,433 can be delivered in Reading Borough. Delivering this level of housing set out in policy H1 will mean there is a shortfall of 644 dwellings.

1.3 Slough supports this approach which recognises that t Reading is a very tightly defined urban area, and sites for new development are limited. This means that, like Slough there is not enough land to meet the objectively assessed housing needs within the Borough.

1.4 The Reading draft local plan states that the need will be accommodated elsewhere within the Western Berkshire Housing Market Area. It is considered that Slough Borough Council supports this approach.

Meeting Employment Needs

1.5 An Economic Development Needs Assessment (EDNA) for Central Berkshire was carried out in 2016, which identified the level of need for additional office and industrial or warehouse space between 2013 and 2036. The results of the EDNA showed that Reading needs to plan for between 2013 and 2036 52,775 of office floorspace; and 148,440 sq m of industrial and warehouse floorspace.

- 1.6 Slough Borough Council agree with the results of the 2016 EDNA , including that Reading falls within a different functional economic area (FEMA) to Slough; that Windsor and Maidenhead falls within both the Central and Eastern FEMAs; and Slough forms the Eastern FEMA with Windsor and Maidenhead .

EM1: PROVISION OF EMPLOYMENT DEVELOPMENT

Provision will be made for an additional 53,000-112,000 sq m of office floorspace and 148,000 sq m of industrial and/or warehouse space in Reading Borough for the period 2013 to 2036.

- 1.7 Policy EM1 identifies that Reading can accommodate its full employment needs. It is considered that Slough should support Reading's commitment to meet its industrial and warehousing need in full, but notes that it will provide an additional supply of offices. Slough has no objection to this provided that this does not result in impacts on the Eastern FEMA.

Retail and Leisure Needs

- 1.8 Policy RL2 sets out below that there will be additional 34,900 sqm of retail and related facilities.
- 1.9 The identified retail and leisure need is directed to the centre of Reading, f the retail floorspace is mainly planned for in the site allocations and major opportunity areas (CR11, CR12 and CR13) in centre of Reading.
- 1.10 Slough Borough Council does not object to the additional retail floorspace being developed as majority of this is committed development that helps support the regeneration of Reading town centre, around the train station, edge of town and district centres.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

n/a

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

SMEETH, E.R.

3rd January 2017

Planning Policy Team,
Reading Borough Council
Bridge Street
Reading EG1 2LU

Reading Borough Council

12 JAN 2018

Dear Sir/Madam,

Planning

The new Borough Local plan is a very long and involved document but the items that stand out most is the large amount of extra housing required within the tight boundaries of the borough.

In order to maximise the number of dwellings an increasing number of what were once single occupancy homes are being turned into Houses of Multiple Occupancy. Although this houses many more people a lot of them appear to be unsafe with the landlord not maintaining them properly and a return to pre-war standards of several families using the same toilet facilities. Perhaps in order to maintain some control any house that changes from single to multiple, ie more than one family to two or more tenancies, not the current 4 or 5 should be subject to planning and put on a register so that if problems arise the landlord can be traced. This ensures good safe homes for people. I believe that some councils have adopted this approach.

Reading is already very densely populated and struggling to survive on Victorian main sewers and over patched water pipes. Every time another development takes place these overstretched amenities are further overloaded, hence frequent digging up of roads to patch another pipe. It should be a condition of a planning decision that the contractor should talk with highways department and the services involved and make arrangements with them to increase the capacity to cover a foreseen increased need before work starts on the building. This cost should be considered when the sum for section 106, paid by the developer, is calculated and part then paid to the service providers and overseen by the council. In the past the council does not always use that money for the needed services. When Waitrose wanted to expand its Oxford Road store some years ago it seems the council had so much money that I was told it was used to provide "flower beds" at the junction of Broomfield Road and Norcot Road, (which the council do not keep in order.) What relationship this had with a larger store a mile away is beyond me. A discussion between the council and the store over the effect on the locality from that extra lorry use would have been helpful and should have gone some way to rebuilding Scours lane which is a disgrace.

When the Potteries estate was built off Norcot Road, land was left for a community centre. This land was never used for the purpose and now has

houses built on it. This does show that planning is given on certain conditions which are then breeched.

The town does need more homes for workers, 2 and 3 bedroom homes and the Dee Road redevelopment is a good example of what is needed including electricity generating equipment on the roofs which maybe has removed the need for a new electricity sub- station to be built. However can the schools provide education for an increased number of children? What about a Health clinic? The same question arises from any large new development.

I was sorry to read that only 2 allotment sites appear to be sacrosanct, Caversham Court and Emmer Green. With so many flats being built it is strange that the plan reads as if there is a presumption of retention of allotment sites only. It used to be a statutory requirement for local councils to provide sites if there was a need. This presumption is the get out clause since part of "Tilehurst Pools" allotment site has been included in possible building sites. When there is need for houses it seems all the work done to retain those allotments and trees and bushes on the top of the hill has been wasted.

Mapledurham Playing fields have been designated LGS. If it is a local green space does it really need a school built on it so reducing the size of said green space which was given to the town as such in perpetuity? Bugs Bottom was supposed to have the school when all the fuss about building in that area occurred some years ago. The said school was never built. Another planning decision breeched.

The Kennet and the Thames are gradually losing their wild places in the town centre. What is supposed to happen to the wild life that lives there? Their habitat throughout the borough is being slowly eaten away. They need homes too. All can't live in the tamed copses and parks which are preserved in the plan. Those poor deer in the cemetery at Cemetery junction are stuck and will, one assumes, inbreed without access to new blood lines. So it could be with other groups of wild animals without corridors of **safe** movement which are mentioned but will they occur? Borough residents too need the trees and bushes to clean the towns polluted air. The congested town needs lungs to clean the air. The river corridors have been providing some relief until now and should be seen as a wild asset not a place for another road.

On a tangent not to do with the plan, does the council have any thoughts on the number of smelly wood burners which are legal because they can burn dual fuel but which pollute the air when the wind is not blowing. Even the trees seem unable to deal with that awful smell.

Yours faithfully

A solid black rectangular box redacting the signature of Mrs ER Smeeth.

Mrs ER Smeeth

SMITH, PAUL

From:
Sent: 24 January 2018 07:45
To: Planning Policy
Subject: Mapledurham playing fields

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

With regard to the proposal to build a school on Mapledurham playing fields and with reference to the draft Local Plan Section EN7N Item EN7Nn, I would like to ask the following questions:

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
 - a. Traffic movements
 - b. Air pollution
 - c. Noise pollution
 - d. Visual dominance and overbearing on the area of the site where they propose to build
 - e. Privacy and overlooking
 - f. Out of character with local residential properties
 - g. Light pollution
 - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
 - i. Hours of operation
 - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Regards
Paul Smith

Click [here](#) to report this email as spam.

SMITH, PETER AND LINDA

From: Peter & Linda Smith
Sent: 21 January 2018 17:14
To: Planning Policy
Subject: Proposed Reading Borough Local Plan with especial reference to Reading Golf Course - Site A19 - and surrounding areas

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

Sir/Madam

We have written to you on this issue earlier – see attached e-mail comments dated March 6 2016 – chiefly concerning the adverse impact of developing the Golf Course site and adjoining local areas.

We are of the opinion that the latest version of plans still has not addressed the key issues that we raised at that time and therefore repeat our objection.

The latest plans still do not effectively address the points that we raised:

- The serious concerns of traffic density (#1 and #2 below)
- Further pressure on school places and doctor services (#3 and #4 below)

Indeed there are further points that must be considered alongside the proposals to develop the area in proximity to the Golf Course site:

Since our last communication, it has become increasingly apparent that traffic density and speed along Kidmore End Road continues to worsen as the road is ever more a “rat run” to the main road to Oxford and to Sonning Common.

This has recently deteriorated even more as new houses have been built on the edge of Sonning Common. This speed and density issue already causes concern due to the increased risk from the traffic to young children at the entrance and egress from the playing field area (well used) on Kidmore End Road.

Already there is clear regular occurrence of road speed well in excess of 30 mph which posted limits seem unable to control.

The proposed development is liable to lead to even more higher speed occurrences and increased risk to children – both at play and walking to the local schools.

The development would also lead to an increase in the traffic flows into the areas of outstanding natural beauty in South Oxfordshire, on roads which are not wide enough to allow two way traffic flows.

Some of these roads, especially the one from Emmer Green to Kidmore End, are already well used and further traffic would significantly increase the risk of serious accidents.

The potential development of the golf course area also should be considered alongside the risk to the fine, well developed trees, many of which should be subject to existing TPO's. Protecting such arboreal growth and environment is likely to conflict with the efficacy of proposed housing development.

Furthermore, we have in the past been told that the area is one where there is an active community of bats. We would expect that any plans of mid/large scale development as proposed would be subject to the usual restrictions and controls that apply for such protected species.

These concerns, together with the points raised in our original communication to you confirm even more that the risk to our young children, the surrounding environment and its amenity outweighs any potential benefit that may be realised from such a development.

We reiterate our opposition to the proposals in the Reading Borough Local Plan.

Peter and Linda Smith

From: Peter & Linda Smith

Sent: Sunday, March 6, 2016 5:11 PM

To: LDF@reading.gov.uk

Subject: Proposed Reading Borough Local Plan with especial reference to Reading Golf Course - Site A19

Sir/Madam

We respond to your document on a new Local Plan and the Consultation on Issues and Options.

This plan for development for Reading contains elements which would affect adversely the amenity in Emmer Green adjacent to/close to Reading Golf Club (Site A19). In our opinion, it is in conflict with the Core Objective concerning quality of life.

As local residents this causes us concern and we summarise some of the key points below ; it is not possible to provide you with an exhaustive analysis until and if any detail proposals are made.

Among the specific concerns arising from any development of the Golf Course are:

1. Access to and traffic on Kidmore End Road:
The impact of more traffic turning on to this road will be major and significantly adverse. This road is already subject to heavy through traffic. Residents without garages/parking places have to park on roadside, reducing it essentially to an alternating one way circulation for much of the day.
2. Access to Caversham and Town:
The increase in population would increase further rush hour traffic from Peppard Road and the already inevitable "rat runs" along Hemdean Road, currently heavily congested and add to the heavy traffic over both congested bridges.
3. Pressure on School places:
Already heavily subscribed (viz refer to the recent discussions for extra school on Mapledurham playing fields)
4. Pressure on Doctor Services:
Already heavily subscribed and led to suspension of new patients at a practise for a recent period.
5. Impact on archaeological sites:
Responses to previous planning applications revealed the risk of disturbing remains of adjacent ancient sites and possibly the Golf Course and surrounding area.

In view of these major factors and other negative impacts, we believe that the consequence of utilising and altering the designation of part of Reading Golf Club for housing does not justify the risk to the surrounding amenity. We therefore request that the plan leaves the utilisation of the Reading Golf Club site unchanged, thereby avoiding the serious adverse consequences outlined above and other impacts.

Yours sincerely

Peter and Linda Smith

SMITH, WILLIAM

Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	William	
Last Name	Smith	
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>		
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Reading Golf Course

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Given the scale of the proposed development there are serious access issues to and from t main road that would be very disruptive to the surrounding area and its residents. These would be extremely difficult and expensive to remedy. If Clayfield Copse was turned aside I cannot see why this site with far more access issues should be even considered. Developments such as the Bewley Homes development which has direct access to the main road makes much more sense although some of the comments below also apply.

There are currently serious access issues to the centre of Reading, the IDR and beyond from North of the Thames.. The rather obvious solution to this would be the third bridge inking to the 329M. Until this is actually built there can be no question of any further development on this scale north of the river.

The Golf Course itself provides a beautiful open space enjoyed by members past and present and hopefully the future. Far too many such leisure facilities are being destroyed. There are also a large number of local residents who enjoy views over the open space with its many long standing trees many of which have preservation orders on them.

There are already many shortcomings in the provision of essential services to the current residents of the area. A lack of school places. Insufficient medical services (try getting a doctors appointment in Emmer Green!).

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Well given the Access issues I have raised only sites with direct main road access should be considered.
The third river crossing would need to be in place before any major schemes such as this can be considered. The schemes must not be sanctioned without the bridge.
The golf course fails on both of the above issues.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

SONIC STAR PROPERTIES LTD

25 January 2018



Planning Policy
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Mary Fortune
E: mary.fortune@savills.com
DL: +44 (0) 207 075 2849

33 Margaret Street
London W1G 0JD
T: +44 (0) 20 7499 8644
F: +44 (0) 20 7495 3773
savills.com

Dear Sir / Madam,

READING BOROUGH COUNCIL – PRE-SUBMISSION DRAFT LOCAL PLAN CONSULTATION 2017

We act for the Sonic Star Properties Ltd, who is the owner of the site at Bristol and West Arcade (173 – 175 Friar Street) including the properties at 27 – 32 Market Place, Reading, RG1 1JL.

The site is located in the Core of Reading Town Centre and a site plan is attached for reference.

On behalf of our Client, we have prepared the following representations to the Council's consultation on their Pre-Submission Draft Local Plan with a view to bringing the above named site forward for redevelopment.

The focus of our representation is concerned primarily with the failure of the Draft Local Plan to meet the relevant conformity tests required at this stage of the Local Plan process.

Background

Further to the adoption of the Core Strategy in 2008 and its subsequent update in 2015, the Council are working towards the preparation of a new Local Plan which is likely to be adopted in 2018 subject to examination by the Secretary of State, with specific focus on the growth and potential of Central Reading,

Reading Borough Council are therefore consulting on the following documents:

- Pre-Submission Draft Local Plan
- Pre-submission Draft Local Plan Proposals Map
- Sustainability Appraisal of the Pre-Submission Draft Local Plan
- Infrastructure Deliver Plan
- Economic Land Availability Assessment
- Duty to Co-operate Statement

As part of the Local Plan Review process (Call for Sites) Reading Borough Council previously invited the submission of potential development sites for consideration for inclusion in the site allocations part of the Draft Local Plan.

During the Call for Sites consultation in January 2016, the above site was submitted for consideration. Following a review of the Council's response to the Issues and Options stage of the Draft Local Plan, the site has been

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included as an identified site for residential and / or offices with ground floor town centre uses. The allocation indicates a range of 36 – 54 dwellings plus ground floor town centre uses (Policy CR14d).

We welcome and support the emerging allocation for the site.

Site

The site (Former Bristol and West Arcade and 27 – 32 Market Place) is located within Reading Town Centre, on the principal shopping streets of Friar Street and Market Place. The site lies partly within the Market Street and London Street Conservation Area.

173- 175 Friar Street is a derelict vacant former arcade building constructed in the 1950s comprising ground floor retail units and three floors of vacant offices above. Owing to its abandonment for approximately a decade, the property is in a poor state of repair.

Also included in the site are the Grade II Listed properties at 27 – 32 Market Place. All of these properties have also been vacant for a similar period of time. The last use of 28 – 28 Market Place was as a retail unit at basement and ground floor levels with ancillary offices at upper levels. The rear rooms also formed part of the pub at neighbouring 29 – 31 Market Place (The Coopers Arms). The former pub is arranged over basement, ground and three upper floors with the only tradable / public area located at ground floor and ancillary residential accommodation at upper levels. The last use of No. 32 Market Place was as a bank (Class A2) with ancillary offices above.

The site is in a key central location, being situated on the corner of the Town Hall Square and in close proximity to Reading rail station to the north (a key transport hub) and key town centre destinations such as the Oracle to the south. In close proximity to the site is The Town Hall, Reading County Court and the Grade I listed St Lawrence Church. The Forbury Gardens are also within walking distance.

Given its location in a prominent position in Reading town centre, it is essential that viable proposals to reinvigorate this vacant and derelict site come forward and that the emerging policies provide a suitable policy framework to enable its delivery.

Planning Policy Background – Adopted and Emerging Policy

National Planning Policy Guidance

Section 2 of the NPPF seeks to ensure the vitality of town centres. In particular, paragraph 23 provides LPA's with guidance on achieving suitable planning policies that are positive, promote competitive town centres and pursue policies which support their viability and vitality.

Adopted Policy

The Council's adopted Development Plan comprises:

- Reading Core Strategy (2008; amended 2015);
- Reading Central AAP (2009);
- Sites and Detailed Policies (2012; amended 2015);

The adopted Development Plan is the basis for determining planning applications.

Emerging Policy

As part of the requirements of the NPPF (para 153) the Council are the process of preparing their new Local Plan. At this stage however, only limited material weight can be given to the emerging policies prior to being submitted for examination.

Policy Considerations

Housing and Density

Emerging Policy H1 and H2 identifies the housing need over the plan period for the Borough. The Draft Plan identifies a need for 16,077 homes of which 15,433 can be accommodated in Reading Borough. This leaves a shortfall of 644 homes to be delivered across the HMA.

It should be recognised therefore that in areas of the borough where the greatest level of development is expected i.e. Reading, that higher densities will be supported in urban areas and / or accessible locations in order to achieve the borough's target for housing delivery.

Affordable Housing

Emerging Policy H3 requires a target of 30% affordable housing on sites of ten or more dwellings. Where any proposal falls short of the target a financial appraisal will be required to support an application.

It should be clearly highlighted in this policy that all site specific considerations should be considered as part of the financial appraisal when presenting the maximum reasonable offer that may affect the viability of future development coming forward i.e. costs associated with listed buildings, ground conditions etc.

Design

Draft Policy CC7 requires that all development “*must be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located*”. The policy looks at the following forms;

- *Layout: urban structure and urban grain;*
- *Landscape;*
- *Density and mix;*
- *Scale: height and massing; and*
- *Architectural detail and materials.*

This policy should include scope for higher density development in accessible / urban locations in order to meet the development targets for Reading as set out in Section 2.2 of the Draft Local Plan and Draft Policy CC6.

Draft Policy CR10 sets out the requirements for tall building development and it is noted that this applies only to buildings of 10 storeys or more.

Amenity

Draft Policy CC8 requires all development to have no adverse impact on existing and future residential amenity.

The policy requires that an appropriate separation distance to protect amenity would be 20m back to back distance. This however is unreasonable in denser urban environments where there is a tighter urban form.

The policy as drafted notes, “*...although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy*”

This flexibility should apply for development in built up / urban / dense environments where reduced separation distances are already an established feature, and where applying prescriptive distances would stifle future development

The policy should include an allowance for the introduction of suitable design measures where they would have an ability to protect existing levels of amenity. In central and urban locations high quality design can often mitigate against potential amenity issues in itself, and the policy should be amended to reflect this.

Heritage

Draft Policy EN1 requires the protection and enhancement of all Designated Heritage Assets.

It is recognised that the Council have a legal duty to protect these Designated Heritage Assets under the Planning (Conservation Areas and Listed Buildings) Act 1990. To this end, the policy requires any application that has the potential to affect a the significant features of a heritage asset to be supported by a Heritage Statement.

The policy does not identify that bringing vacant Listed Buildings back into use for their optimum viable use, is a public benefit and which enables the long term viability of a building to be preserved. This is a key element of the NPPF, and applications which secure the viability of a Listed Building should be supported in principle.

Draft Policy EN3 provides a summary of proposals that would be considered improvements to the character and appearance of Conservation Areas. The list does not however include bringing vacant or redundant buildings back into an active use, which has the ability to secure their long term future It is therefore suggested that policy EN3 is expanded in order to recognise the importance of bringing vacant listed buildings back into use.

Draft Policy EN6 requires new development within a historical context to ensure it makes a positive contribution to the existing townscape. The policy should recognise the need to balance new development alongside the aims of preserving and enhancing the historical context.

Retail

Draft Policy CR8 notes that small shop units are important for Town Centres and specifically identifies that the loss of smaller shop units (under 75 sqm) will not be permitted. It does not however account for any changes or flexibility in the retail market through a tested approach.

In this instance we are referring to arcades in particular, which have been vacant for a significant period of time providing no active contribution towards the role or function of the Town Centre.

This policy should be amended to allow for changes in market demand, particularly in town centre locations to avoid vacant units. The policy as currently worded, indicates that the Council would rather have vacant units in the town centre than promoting retail units that are easier to occupy and therefore ensuring that the continued retail function of Reading town centre is maintained. This is directly contrary to the objectives of the Draft Pre-submission Local Plan for Reading as a regional centre being the primary centre in the Borough (Draft Policy RL1). Para 4.6.2 of the Draft Local Plan endorses this in stating, "*Reading is clearly by far the dominant centre within the borough and for much of the surrounding area. It is the centre where the vast majority of the town centre development will occur*".

Draft Policy CR8 therefore is in direct conflict with the ambitions of Draft Policy RL1 to maintain Reading as a Regional Centre and the paragraph 23 of the NPPF.

Typically, there is a policy test for changes to commercial properties which is tested through marketing evidence. This has been proposed in Draft Policy EM3 for any changes to office accommodation, and it is suggested that a similar approach could be adopted for retail properties.

In this instance the policy must be flexible to meet changes in market demand for retail floorspace, particularly in key shopping areas in order to maintain their vitality and viability. This could be evidenced through robust marketing evidence i.e. 18 months to demonstrate that the floorspace is no longer viable.

The consultation on the emerging Local Plan has been supported by a number of technical reports including a Retail and Commercial Leisure Assessment undertaken in 2016 and published in April 2017 for the Western Berkshire Authorities. Paragraph 4.4 of the Assessment highlights the changes to retailer space requirements since the greater dependence on internet shopping. The report identifies that retailers are now focusing their growth programmes on having a large flagship store in strategic locations with smaller stores in satellite locations. This has been supported by our own research into retailers who are actively searching for retail floorspace in Reading Town Centre.

On this basis, we have suggested an alternative wording for Policy CR8 for the Inspector to consider,

***“Shop units make an important contribution to the diversity of the centre. Some areas of the centre are particularly characterised by small units, of less than 75 sqm. These include the arcades, Cross Street, Queen Victoria Street, Union Street, and any other areas designated in the function.*”**

Within the areas characterised by small shop units, the amalgamation of individual shop fronts will not be permitted unless it is demonstrated, to the Council’s satisfaction, through robust marketing evidence of a minimum of 18 months that the floorspace is no longer viable or that there is a lack of demand.

Sustainability

Emerging policy H5 requires all new build major residential development to achieve zero carbon homes. Supporting paragraph 4.4.44 sets out that the general target will be a 35% carbon reduction on site with a ‘top-up’ contribution of £1,800 per tonne towards carbon offsetting (calculated as a £60 per tonne over a 30 year period).

There are no provisions within this policy to ensure that this is viable and subject to financial analysis. This additional cost for developers will clearly impact on the Residual value and the ability of the site to provide policy compliant affordable housing or other benefits through the s106 route.

Protection of Public Houses

Emerging Policy RL6 seeks to protect the loss of Public Houses within the Borough. It is noted that the Council will resist the loss of A4 uses unless there is no longer a need for such a facility or the function of the facility will be fulfilled by an existing facility or re-provided as part of the development.

The policy should clearly note that a reduced size of A4 unit could be considered as an acceptable way in which to re-provide an A4 unit, retaining the primary sales area at ground floor level.

Open Public Space

Emerging Policy CR3 seeks to ensure that development makes a positive contribution towards the quality of the public realm in the central area of Reading. It notes that development sites over 1 ha will be required to provide new public space or civic squares and smaller developments will contribute towards improvements to the public realm.

We note in supporting paragraph 5.3.11 the Council go on to identify that,

“Improvements to the public realm may include works such as the provision of open space, the improvement of pedestrian access to existing open space, the provision of landscaping and green infrastructure, and wider streets that act as open space”

Given the constraints of sites under 1 ha, it is unreasonable for the Council to request on site public open space from smaller sites. We would request that this reference is removed and the Council rely upon their CIL Receipts to enhance access to open space (open space is identified on the Council's Draft Regulation 123 List).

Potential

The principle of redeveloping this site for a mixed use development is considered to be acceptable by virtue of the Site Allocation. This provides a framework for this site to come forwards for redevelopment and includes the provision of ground floor town centres uses (retail and a public house). As it stands the proposed policies within the Draft Local Plan are overtly restrictive with regards to the provision of retail uses, and as suggested above should include a mechanism to demonstrate the lack of demand or viability for small units. The adoption of a more flexible policy would enable a scheme to be delivered which includes an important ground floor retail function (and contribution to the town centre function) but which responds more directly to changing market demands.

Summary

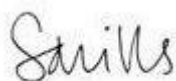
Overall, on behalf of our Client, we have prepared this response to the Council's Pre-Submission Consultation on their Draft Local Plan.

We have demonstrated within this letter, that as currently drafted, the Council's Draft Local Plan does not meet the statutory requirements to be in conformity with the National Planning Policy Framework.

We would be grateful if you could confirm receipt of these documents.

In the meantime, should you require any additional information or have any further queries, please do not hesitate to contact me on the details at the head of this letter.

Yours sincerely



Mary Fortune
Senior Planner

SOUTH OXFORDSHIRE DISTRICT COUNCIL

Planning

HEAD OF SERVICE: ADRIAN DUFFIELD



Listening Learning Leading

Contact officer: Rona Knott
Planning.policy@southoxon.gov.uk
Tel: 01235 422600

Textphone users add 18001 before you dial

Your reference:
Our reference: RBC Pre-Sub LP Jan 18

Dear Planning Policy team

Comments on Pre-Submission Draft Local Plan (Nov 2017)

Thank you for the opportunity to comment on the emerging Reading Borough Local Plan (November 2017). We consider the Pre-Submission Draft Local Plan to be sound, legally compliant and to fulfil the duty to cooperate.

Our response is set out below using policy numbers and paragraph numbers for reference.

Policy CC9 – Securing Infrastructure

We note the reference in this policy to giving major cross-boundary or sub-regional infrastructure the highest priority.

We are keen to work with you to understand further and in more detail the specific locations and justification for any major cross-boundary or sub-regional infrastructure that will impact upon South Oxfordshire.

Policy EM1 – Provision of Employment Development

The Economic Development Needs Assessment for Central Berkshire (2016) identified a need for Reading to provide 52,775 sq m of office floorspace and 148,440 sq m of industrial and warehouse floorspace over the plan period. The Pre-Submission Draft Reading Local Plan (November 2017) identifies appropriate locations to address this need within Reading Borough.

Policy H1 – Provision of Housing

This policy makes provision for 15,433 homes in Reading for the period 2013 to 2036, equating to 671 homes per annum over the plan period. The requirement is based on the results of the Reading Housing and Economic Land Availability Assessment (May 2017). Reading's objectively assessed need, identified in the Berkshire (with South Bucks) Strategic Housing Market Assessment (2016) is 699 dwellings a year, a total of 16,077 between 2013-2036. The Local Plan therefore identifies a shortfall of 644 dwellings in total.

The Local Plan recognises that this will need to be accommodated within the Western Berkshire Housing Market Area (Bracknell Forest borough Council, Reading Borough Council, West Berkshire District Council and Wokingham Borough Council). The local authorities that lie within the Western Berkshire Housing Market Area have agreed that the full objectively assessed housing need should be met with the Western Berkshire Housing Market Area.

We note the shortfall identified by Reading Borough Council and fully agree that this should be accommodated within the Western Berkshire Housing Market Area and we strongly support the ongoing cooperation between the four Western Berkshire authorities.

Policy H13 – Provision for Gypsies and Travellers

The Reading Borough Gypsy and Traveller, Travelling Showperson and Houseboat Dweller Accommodation Assessment (2017) identifies a need for 10-17 permanent gypsy and traveller pitches and 5 transit pitches up to 2037. It also identified two additional plots for travelling showpeople up to 2037. Following a site assessment process, it was found that there are no sites to meet the permanent accommodation needs.

We consider that a site or sites should be identified to address these needs and that the site(s) should be provided in the area where the need arises. We agree with national policy that requires the local authority where the need arises to meet that need, unless there are exceptional reasons why it should not.

To this end, we would seek assurances that all options have been explored in terms of identifying appropriate sites or including gypsy and traveller provision within residential or mixed use allocations proposed in the Pre-Submission Draft Reading Local Plan and/or the development opportunity identified at Grazeley in the West of Berkshire Spatial Planning Framework (2016) and Pre-Submission Draft Reading Local Plan.

If a site cannot be found, we note your intent to resolve the issue with neighbouring authorities through the duty to co-operate. We are happy to establish an open dialogue regarding the results of your Gypsy and Traveller Accommodation Assessment.

Policy H13 lists a set of criteria against which proposal for new sites, or extensions to existing sites will be judged. This includes having '*good access to a range of facilities including education and healthcare by a choice of means of travel, including walking*'. We would note that policies for determining gypsy and traveller sites should not be more restrictive than those for bricks and mortar accommodation, making it harder to gain planning permission for sites. We would question why sites for gypsy and traveller would be required to have access by foot to healthcare and education. This restricts the opportunities for meeting the identified within Reading.

Policy TR2 – Major Transport Projects

We note that Policy TR2 gives priority to the implementation of major transport projects including park and ride sites and a potential additional crossing of the River Thames.

Paragraph 4.5.8 and Figure 4.8 identify those projects likely to have the most significant needs in terms of land use. This includes three park and ride sites in the north of the Borough and a potential additional Thames crossing. These schemes are also identified in paragraph 8.2.1 that sets out the key principles relating to the strategy for Caversham and Emmer Green.

We note that no specific sites have been identified for new park & ride sites as outlined in policy TR2, but that these are likely to be within neighbouring authorities, including South Oxfordshire, where there are three corridors that cross the border into South Oxfordshire, as shown in Figure 4.8.

South Oxfordshire District Council is keen to work with you to understand further and in more detail the specific locations and justification for these major transport projects.

We do not wish to participate at the oral examination.

Kind regards,

Rona Knott
Senior Planning Policy Officer
South Oxfordshire District Council

SPIRES, SUSAN

From: SUSAN SPIRES
Sent: 26 January 2018 10:08
To: Planning Policy
Subject: Local plan and MPF

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

I am writing in reference to the RBC Local Plan Section EN7N Item EN7Nn.

I would like answers to my concerns about the way in which RBC is ignoring it's own local plan.

Mapledurham Playing Fields (MPF), is a green space which was left in trust for recreation purposes so I would like to know why the local plan is being ignored.

What are RBC doing to show commitment to the local plan and protect MPF from being built on, a much needed and used green space?

What are RBC doing to protect other green spaces particularly those that have been left in trust as it appears that RBC are using the local plan as a PR exercise to look good but not actually implementing it?

Should the FESA proposal be approved what will RBC do to ensure that the adverse effects of having a school on MPF are minimized. These include but are not limited to:

1. Traffic congestion.
2. Dangers to pedestrians from excessive traffic
3. Parking issues around the nearby roads
4. Air pollution
5. Noise pollution from the extra traffic and when the children are playing outside.
6. Light pollution
7. Reduction of the quality of the environment
8. The impact to other users of the playing fields, e.g. footballers, tennis club members, dog walkers, people who use it to relax for their mental well-being amongst many other casual users
9. Detrimental visual impact of MPF.
10. The building will be out of character with other residential properties, a lot being older bungalows, so how can this be made to blend in.
11. The building being 2 floors high will affect the privacy and overlook the nearby bungalows.
12. Hours of operation.

Please answer all my points with actual facts rather than a standard email.

Kind regards,

Susan Spires

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SPORT ENGLAND

From: Bob Sharples <Bob.Sharples@sportengland.org>
Sent: 19 January 2018 07:27
To: Planning Policy
Subject: Pre-Submission Draft Local Plan
Attachments: 20180117 economic-value-of-sport-Reading.xlsm

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

Dear Sirs,

Thank you for inviting Sport England to comment on the Pre-Submission Draft Reading Borough Local Plan – November 2017. I was encouraged to see that a number of comments that my colleague Vicky Aston had made on the draft Local Plan last year have been addressed.

Below are comments which I wish to make on the Pre-Submission Plan:

Paragraph 4.1.32 – Sport England welcomes the Council’s inclusion of a reference to Sport England’s Active Design principles.

Policy CC9: *Securing Infrastructure* – Sport England supports this policy, but it requires the Reading Playing Pitch Strategy to be completed and adopted to make it robust. There is also the need to refresh and adopt the Built Facilities Strategy with which Sport England assisted the council in 2015.

Policy EN7: *Local Green Space and Public Open Space* – As mentioned previously by my colleague Vicky Aston, Sport England has reviewed the ‘local green space assessment matrix’ April 2017. Sport England welcomes the Council’s inclusion of a number of playing fields being identified as local green space (see paragraphs 76 and 77 of the NPPF).

However, I am concerned that the issues of potential Artificial Grass Pitches (AGPs) have not been addressed here. If an AGP (with floodlighting and high fencing) is proposed at any of these locations, it is important that the Council considers designating these in the plan to ensure that the principle of these developments in these locations is acceptable. Not to do so could cause planning blight for clubs who own, lease or play on any sites listed, and could stop them growing and expanding if they could not gain planning permission.

Paragraph 4.2.29 – reference is made to the Council’s open space strategy which was published in March 2007. This is certainly out of date and I do not consider it to be robust and it is therefore contrary to the NPPF paragraph 73. Either the strategy is updated, or the reference to it needs to be removed. I am aware that Reading has been carrying out a playing pitch strategy for some time, but I am concerned that the data could be out of date by the time it is published or it will need refreshing at the very least.

Policy EN8: *Undesignated Open Space* - Sport England is still concerned that the list for EN7 may not include all playing fields in the Borough, as acknowledged in the Council’s forthcoming playing pitch strategy. For example, there are also a number of school playing fields and sports facilities (e.g. artificial pitches) that whilst controlled by education authorities are used by the

public and have not been included in this list. Sport England is concerned that Policy EN8 may not provide sufficient protection for these playing fields from school development or other types of development for example. Sport England therefore recommends that the plan includes a separate policy that will protect playing fields from development.

Policy EN9: Provision of Open Space - Sport England continues to be concerned that it appears from recent planning application consultations that for some housing schemes, limited monies from new development in the Borough are being directed towards new sports and leisure facilities and the improvement of the open spaces (including playing fields) that will serve these developments. Sport England would like to see more allocations for sport and leisure facilities to be included within the development plan to support growth. The work on the Playing Pitch Strategy will help with this.

Figure 4.3 – Whilst this list is admirable, it does not address paragraph 73 of the NPPF, which clearly states that provision for sport and recreation should be based on sound local assessment. Neither the NPPF or Sport England supports standards, therefore reference should be made that all new sport and recreation facilities which are to be provided are based on up-to date robust assessments.

Policy EN10: Access to open space - Sport England continues to support the Council’s intention to ensure that new developments have access to open space for physical activity.

Policy EN11: Waterspaces – Sport England support this policy as watercourses play an import role allowing informal recreation and sport to take place.

Policy EM3: Loss of Employment Land - Sport makes a huge contribution to the lives of individuals, to the economy and to society. Sport England has undertaken research to examine the economic value of sport in England. The main conclusions are:

- In 2010, sport and sport-related activity generated Gross Value Added (GVA) of £20.3 billion – 1.9% of the total GVA in England. This placed sport within the top 15 industry sectors in England and higher than sale and repair of motor vehicles, insurance, telecoms services, legal services and accounting.*
- Sport and sport-related activity is estimated to support over 400,000 full-time equivalent jobs – 2.3% of all jobs in England.

Sport also generates a range of wider benefits, both for individuals and society:

- The benefits of playing sport include the well-being/ happiness of individuals taking part, improved health and education, a reduction in youth crime, environmental benefits, stimulating regeneration and community development, and benefits to the individual and wider society through volunteering.
- Consumption of sport benefits include the well-being/ happiness of spectators, and the national pride/feel good factor through sporting success/achievement.

- The economic value of sport in terms of health and volunteering in England is estimated in 2011-2012 to have been £2.7 billion per annum for volunteering and £11.2 billion per annum for health.

(**Economic value of sport in England* June 2013 published by Sport England)

Traditional forms of employment have been changing in the last 100 years, unfortunately the perception of what employment land is has not. The introduction of B8 distribution challenged local authorities in the 80's and '90s as more of these uses came forward. Sport is often overlooked as an employer.

It is estimated that a total of 1,699 people are employed via sport in Reading with an economic generation of £56.5m into the local economy. There are wider values as well in saving £67.4m in the health economy and generating £8.4m in wider spending with a further £16.5m in volunteering. Looking at statistics for Real Estate (1,250) and Water Supply (500) employment sectors in 2016 in Reading, these figures are all lower than those employed in sport.

<https://www.nomisweb.co.uk/reports/lmp/la/1946157285/report.aspx>

<https://www.sportengland.org/our-work/partnering-local-government/tools-directory/economic-value-of-sport-local-model/>

It is Sport England's contention that Reading should consider D2 sports uses; fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites, as they do create sustainable employment opportunities and provide work experience and qualifications in cases for the less academically inclined.

When sports facilities are designed in as part of an employment part e.g. Wolverhampton Business Park or Harwell Science Park, it creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to.

Also, it should not be overlooked that there are usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms or commercial football e.g. Football First, or a gymnastics club D2 use, than a 500,000m² B8 use.

In conclusion, Sport England wishes the Reading Borough Council Local Plan to acknowledge that commercial sports (not retail) are a Bona Fide use on Industrial and Business parks creating employment as well as inputting into the local economy. Therefore, they should be treated like any other business when applying for planning permission for change of use or new development on sites covered in this Plan.

Policy RL6: *Protection of Leisure Facilities and Public Houses* – In principle Sport England supports the inclusion of this policy, however there are a few issues we would like to raise/continue to raise around this policy:

Point a) *There is no need for this type of facility* – the wording here is ambiguous and imprecise. I would advise direction on how to prove lack of need – the site has been marketed at the land use value for a period of not less than 18 months in local and regional/national press.

Also as mentioned previously in the draft local plan response, it may be more appropriate to include a policy in the plan that specifically protects indoor and outdoor sports facilities from loss across the Borough. Sport England is also concerned that the criteria in the policy do not adequately reflect the protection for built sports facilities within paragraph 74 of the National Planning Policy Framework or circumstances relevant to sports facilities. The criteria in paragraph 74 state;

‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.’*

This in line with the NPPF.

Sport England therefore objects to this policy as worded and recommends that an amendment is made to the plan to address this point.

Policy OU1: *New and existing community facilities* – Sport England is pleased to support this policy now since our comments on the draft Local Plan have been included.

Policy SR5: *Leisure and Recreation use of Kennetside Areas* – Sport England is supportive of this policy but believes it would be more robust if there was an adopted Built Facility Strategy and Playing Pitch Strategy to back it up.

Policy WR1: *Dee Park* – I would reiterate our comments on the draft local plan submitted on the 14 June 2017: Sport England would encourage the Council to confirm in the policy that any existing playing field and sports facilities within the development area will be protected or replaced. The Council should use its Built Facilities Strategy and Playing Pitch Strategy to set out in the Local Plan which sports facilities will be brought forward to benefit the community.

Policy WR2: *Dowing Road* - I would reiterate our comments on the draft local plan submitted on the 14 June 2017: *Sport England recommends that the Council wait until the completion of the Playing Pitch Strategy before allocating this site for development. Sport England therefore objects to this policy as currently worded. Sport England welcomes the Council’s intention to allocate no other playing fields in the Borough for development.* In addition Sport England could not support pitch improvements to offset the loss of a playing field unless it was supported by a robust and up to date adopted Playing Pitch Strategy.

Policy WR3d: *Rivermead Leisure Centre* - Sport England supports the Council’s intention to improve the sports facilities at Rivermead. However, given that work to support this was carried out in 2015, it would be prudent to revisit the work to ensure the right facility mix/size of pool is adequate for current and future need.

Policy CA1a: *Reading University Boat Club* – Sport England supports this policy but emphasises it is on the proviso that the boat club has been relocated and is operational prior to the existing site being redeveloped.

Policy CA1b: Part of Reading Golf Course - Sport England supports this policy but emphasises it is on the proviso that the replacement clubhouse has been relocated and is operational along with the replacement holes, prior to the existing site being redeveloped.

Policy CA2: Caversham Park - Sport England is pleased to support this policy now since our comments on the draft Local Plan have been included.

Kind regards

Bob

Bob Sharples MRTPI RIBA

Principal Planning Manager - South Hub

T: 07830 315030

M: 07830315030

F: 01509 233 192

E: Bob.Sharples@sportengland.org



Join the conversation #thisgirlcan



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S.S.E. LTD

26 January 2018

18.01.26 PSLP Reg 19 Repts on behalf of Scottish and Southern Energy (Policy CR10)



Planning Policy
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Steven Roberts
E: steven.roberts@savills.com
DL: +44 (0) 118 952 0501

Ground Floor, Hawker House
5-6 Napier Court
Napier Road
Reading RG1 8BW
T: +44 (0) 118 952 0500
savills.com

SENT BY EMAIL

Dear Sirs,

TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

READING BOROUGH COUNCIL – PRE-SUBMISSION DRAFT LOCAL PLAN 3036

Savills act on behalf of Scottish and Southern Energy (SSE). This letter has been prepared in response to the Council's Regulation 19 consultation on the Pre-Submission Draft Reading Borough Local Plan 2036 (PSLP).

SSE has prepared separate representations in response to draft Policy CR11g of the PSLP dated 26 January 2018. This letter specifically responds to Policy CR10: *Tall Buildings* only, but should be read in conjunction with the Policy CR11g response.

Having reviewed the Council's Statement of Consultation (SoC) on the FDLP and the PSLP, SSE consider that many of the points raised in relation to Policy CR10 have not been addressed.

Policy CR10: Tall Buildings

Central Reading has been earmarked to deliver 7,600 homes (along with 71,000 sqm of office space and 27,000 sqm of retail space) over the Plan period to 2036, which equates to nearly half the total number of homes being planned for in the PSLP. This level of growth in the centre of the town is of fundamental importance to the Council's ambitions for Reading to be the capital of the region.

With this planned growth Central Reading will become a focal point for visitors and residents alike. The Station/River Major Opportunity Area (SRMOA) has been earmarked for major regeneration in the adopted Reading Central Area Action Plan (2009) (AAP) to bring about the Council's Local Plan objectives. To deliver this it is anticipated that development will come forward at high densities to ensure that the growth needs of Reading are met.

Key to this is the Station quarter and the associated Station Tall Building Cluster (STBC), as defined by Policy CR10 of the AAP and the Proposals Map. Within this area buildings exceeding 10 storeys for office and 12 storeys for residential are permitted (defined as Tall Buildings in the AAP).

Figure 1 below shows the SRMOA and STBC, the former demarked by the dashed line and the latter by the bold dotted line.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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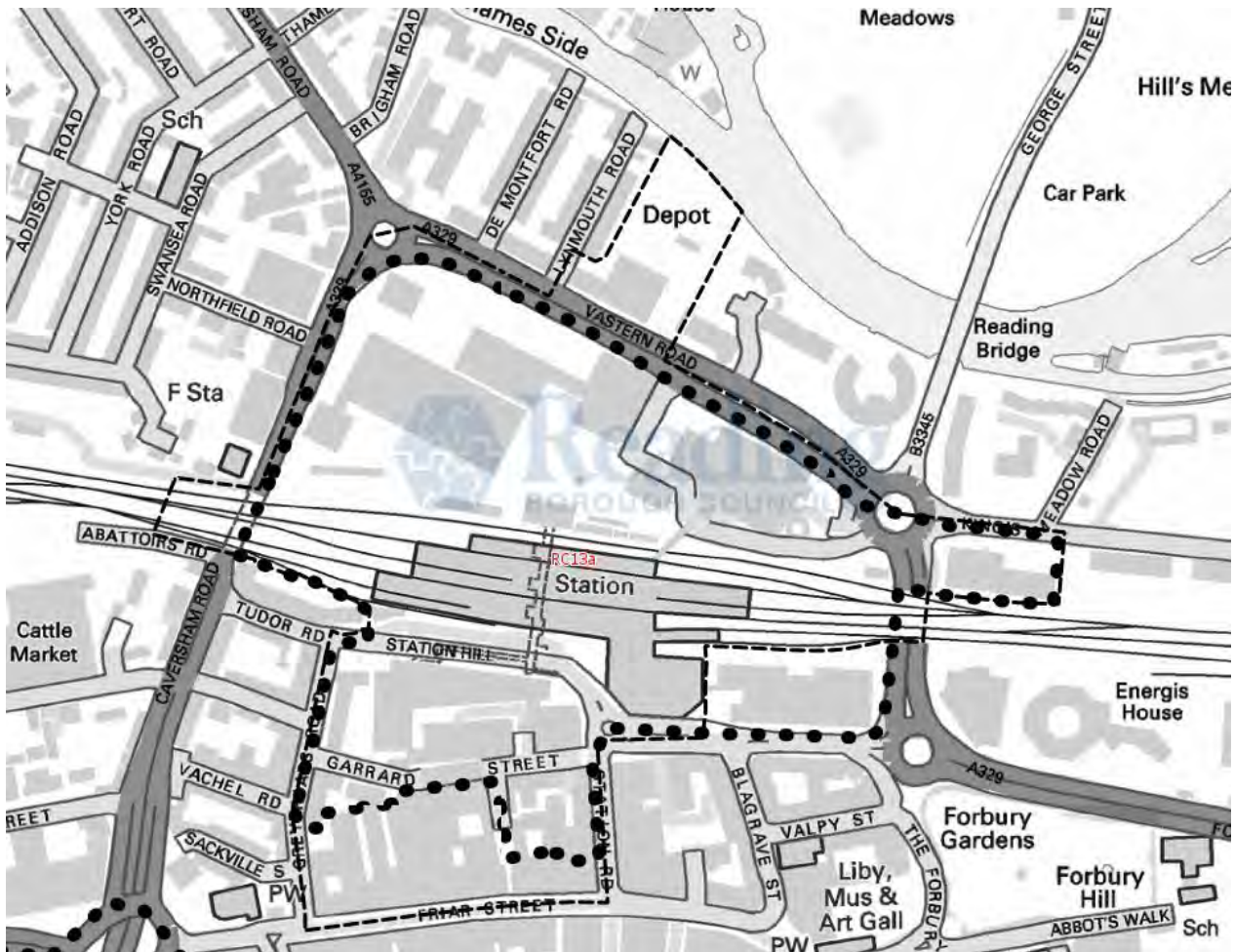


Figure 1 – Extract from Reading Borough Council Proposals Map

With the exception of some inconsequential changes to the text, draft Policy CR10 of the PSLP repeats the Council’s existing tall buildings policy (RC13 of the AAP). It continues to define tall buildings as 10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres tall) or above, and that tall buildings will only be permitted within the three ‘areas of potential for tall buildings’, i.e. the Station Area Cluster, Western Grouping and the Eastern Grouping (as identified on the Proposals Map).

The Sustainability Appraisal examines four policy options for Tall Buildings, including no policy (Option i), continue current policy (Option ii), amend policy approach to include more scope for tall buildings (Option iii) and amend to further limit scope for tall buildings (Option iv). Option (iii) is the preferred option and states that it provides for additional scope for tall buildings. SSE has compared draft Policy CR10 with adopted Policy RC13 (and the respective supporting text) and can find no changes of any substance that would provide “additional scope for tall buildings”.

AAP Policy RC13 is informed by the Reading Tall Buildings Strategy (TBS) published in January 2008. That document is 10 years old and Central Reading has seen significant change during the intervening period, in terms of its growth needs, urban context and public transport accessibility. It is our view that to simply repeat adopted policy restrictions within a rapidly changing urban environment and in the current housing climate, without any technical assessment, fails to plan positively for Reading’s current and future growth needs and is therefore fundamentally flawed.

Notwithstanding this, in light of the Council’s preferred approach SSE has reviewed the TBS, SA and draft Policy CR10 in detail and would raise the following points.

Tall Building definition

The TBS adopts the approach that 'tall' is 10 commercial storeys or equivalent. This informed the threshold in AAP Policy RC13, which has been incorporated in draft Policy CR10 of the PSLP.

However, what is tall in one context may not be termed tall in another. CABE 'Guidance on Tall Buildings' (2007) offers no definitive definition for tall buildings. Instead it refers to context, i.e. that a 10 storey building could be deemed as 'tall' in the context of two storey Victorian terraces, whereas it may not be seen as such within a city centre. The criteria for assessing tall buildings in the CABE guidance explains that it is intended for buildings that are substantially taller than their neighbours and/or which significantly change the skyline.

It is therefore our view that adopting a blanket approach to defining what constitutes a tall building across Reading is too crude, particularly in light of its new urban landscape emerging in the town centre.

Areas of potential for tall buildings

Paragraph 5.2.15 of the PSLP states that Central Reading has physical capacity to incorporate a significant level of new development at high densities. As a consequence paragraph 5.2.16 states that central Reading will accommodate 7,600 homes (along with 71,000 sqm of office space and 27,000 sqm of retail space) over the plan period to 2036, which equates to nearly half the total number of homes being planned for in the PSLP.

Tall buildings have already been planned for within the three central area clusters. However, SSE considers that there to be scope to review this across all three areas, particularly the Station Cluster, in light of the strategic importance placed on the central area to deliver growth and in view of the points raised above.

In considering the suitability of Central Reading to accommodate tall buildings the TBS assessed the townscape character, visual amenity (both within central Reading and into central Reading), historical significance, environmental constraints and market demand. This is a sensible starting point for considering the suitability of the STBC for expansion.

The TBS concludes at Figure 4.1 (page 14) that the SRMOA has townscape capacity for tall buildings (Area 22 shaded in brown). The diagram is copied at Figure 3 below.

In topographical terms, the TBS concludes on page 15 that there are no topographical reasons to restrict tall buildings in the Central Reading area, including the SSE site, stating that:

"The central area of Reading is fairly consistent in terms of topography. Topography does drop towards the River Thames and the River Kennet, but the change in topography is not marked. There is therefore no one particular area which is any more or less appropriate in terms of topography itself."

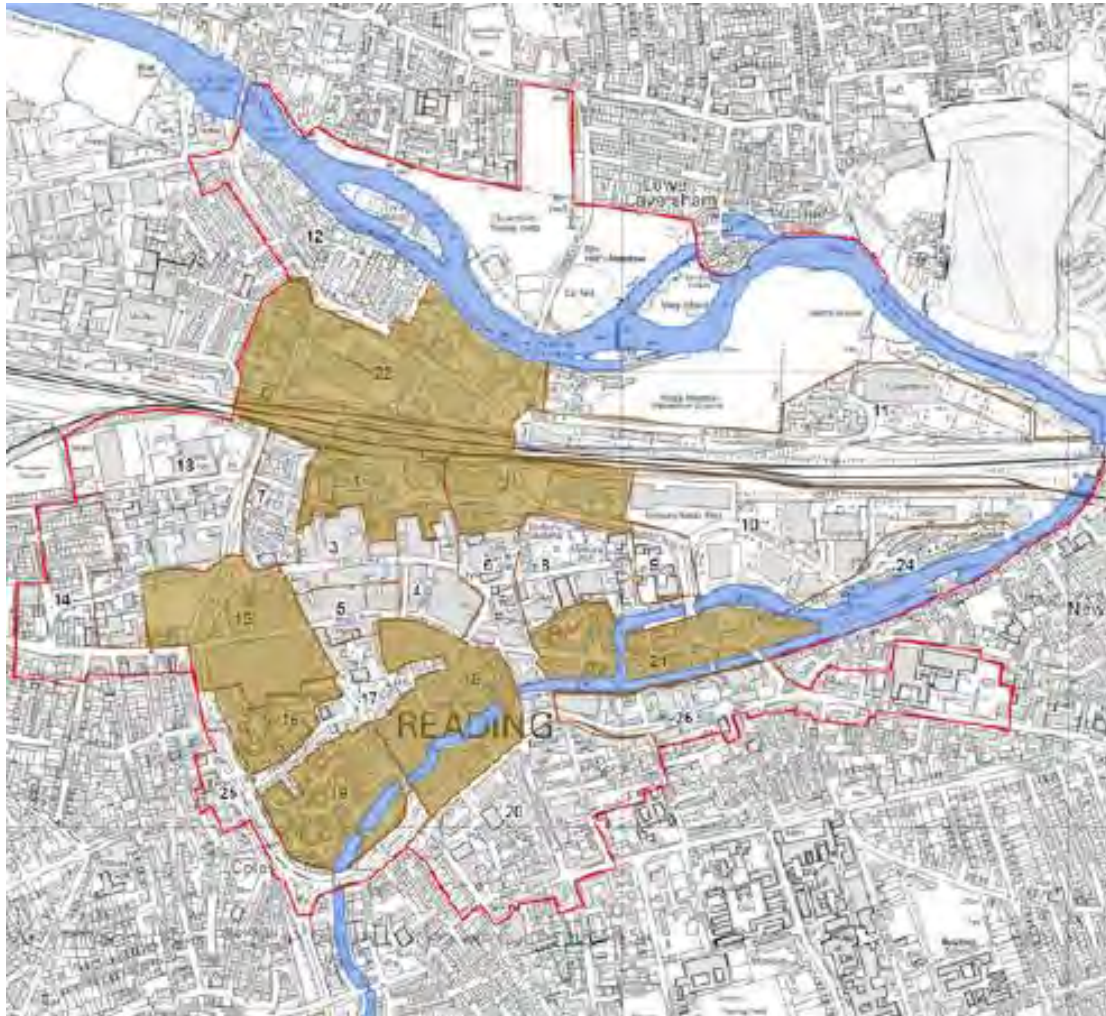


Figure 3 – Figure 4.1 in the Reading Tall Buildings Strategy

In relation to environmental constraints such as flooding, the TBS concludes that the Council's Draft Strategic Flood Risk Assessment for Central Reading land within Flood Zone 3 would not be suitable for tall buildings, stating on page 16 that:

“Due to potential flood risk, no tall buildings could be developed within zones 3b and constraints may apply to development of tall buildings within zone 3a.”

The Environment Agency Flood Map confirm that the majority of character area 22 is in Flood Zone 2, and the Council's Sequential and Exceptions Test of sites in the PSLP (dated December 2017) confirms that the draft allocations in the SRMOA pass the sequential and exceptions tests and are suitable for development.

In terms of historical significance the TBS identifies the historic core of Reading as sensitive to tall buildings. It concludes at page 19 that:

“The prospect of locating tall buildings within the Reading central area will clearly need to be mindful of the sensitivity of the historic core area, but there is an opportunity to consider locations in close proximity in order to re-establish an architectural focus that might contribute to efforts to more clearly express the significance of the surviving medieval urban form.”

Adding that:

“Clearly this would be a challenging prospect, however, if integrated in a fashion that engaged with and helped articulate the historic core area, it could play a significant role in sustaining the local historic environment.”

The TBS confirms at Figures 4.3 and 4.4 that the area does not lie in any high sensitivity local or long range views.

Townscape and Visual Assessment examined Character Area 22: Vastern Road (page 37) and concludes that townscape sensitivity in this area was low, stating that:

“The large block size which exists within the character area and the absence of any key views or visual focal point makes this an appropriate location for tall buildings.”

The TBS concludes overall that the character area has high overall suitability to accommodate tall buildings, stating that:

“The large block size which exists within the character area and the absence of any key views or visual focal point makes this an appropriate location for tall buildings. There are no key views which could be blocked by development of tall buildings. In order for tall building development within this area to be viable in terms of market considerations, there would need to be associated public realm enhancements and enhanced accessibility to improve market perception of the area.”

Although in recognition of the adjacent domestic scale residential properties the TBS comments that tall buildings should not be developed on the north and western edges of the character area, it is our view that this could still be maintained while allowing for taller buildings to come forward in areas of strategic importance, such as around key nodes and strategic movement corridors. Matters such as the transition in scale between any tall buildings and adjacent lower rise development could be appropriately dealt with at planning application stage.

On the basis of the above, SSE are of the view that the Council has ignored its evidence base in not at least considering the option of expanding the boundary of the STBC.

Having regard to the suitability of character area 22 to accommodate tall buildings as assessed in the Council’s TBS, and the enhanced sustainable travel accessibility credentials of the SRMOA with the arrival of Crossrail, the Mass Rapid Transit and the north/south movement corridor, SSE consider that the emerging draft Policy CR10 should be amended to extend the STBC to include all land within the SRMOA and thus enable Reading to realise its ambitions as a regional capital for growth and sustainability.

Proposed changes:

We would therefore request that draft Policy CR10 and the Proposals Map be amended to extend the STBC boundary to cover all of the SRMOA.



Conclusion

We trust that the comments made in this letter are a helpful contribution to the Local Plan 2036 process. In particular, we would highlight the requested changes that have been made in order to address aspects of draft Policy CR10 that in our view are not robust.

Yours sincerely,

Steven Roberts
Associate

Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title

--

Mr

Mr

First Name

--

Steven

Steven

Last Name

--

Roberts

Roberts

Job Title *(if applicable)*

--

--

Organisation *(if applicable)*

Scottish and Southern Energy

Savills

Savills

Address 1

--

Ground Floor, Hawker House

Ground Floor, Hawker House

Address 2

--

5-6 Napier Court

5-6 Napier Court

Address 3

--

Napier Road

Napier Road

Town

--

Reading

Reading

Post Code

--

RG1 8BW

RG1 8BW

Telephone

--

0118 952 0501

0118 952 0501

E-mail

--

Steven.roberts@savills.com

Steven.roberts@savills.com
--

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CR10 - Tall Buildings

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please refer to:

Savills letter dated 26 January 2018 - ref: 18.01.26 PSLP Reg 19 Reps on behalf of Scottish and Southern Energy (Policy CR10)

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please refer to:

Savills letter dated 26 January 2018 - ref: 18.01.26 PSLP Reg 19 Reps on behalf of Scottish and Southern Energy (Policy CR10)

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

Scottish and Southern Energy has identified that the Pre-Submission Draft Local Plan will not plan positively for the growth objectives of Reading and fails to promote sustainable patterns of development by optimising the development potential of land in Central Reading. It is therefore necessary for the Council to reconsider its precautionary approach to tall buildings within Central Reading.

It is on this basis that Scottish and Southern Energy has requested modifications to Policy CR10 to make it sound and therefore under Section 20(6) of the Planning and Compulsory Purchase Act 2004 requests the opportunity to be heard at the Examination in Public to support the case set out in its representations referred to above.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

26 January 2018

18.01.26 PSLP Reg 19 Repls on behalf of Scottish and Southern Energy (Policy CR11)

Planning Policy
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU



Steven Roberts
E: steven.roberts@savills.com
DL: +44 (0) 118 952 0501

Ground Floor, Hawker House
5-6 Napier Court
Napier Road
Reading RG1 8BW
T: +44 (0) 118 952 0500
savills.com

SENT BY EMAIL

Dear Sirs,

TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

READING BOROUGH COUNCIL – PRE-SUBMISSION DRAFT LOCAL PLAN 3036

Savills act on behalf of Scottish and Southern Energy (SSE) in relation to their site on Vastern Road, Reading ('Site'). This letter has been prepared in response to the Council's Regulation 19 consultation on the Pre-Submission Draft Reading Borough Local Plan 2036 (PSLP).

The site is identified by PSLP Policy CR11g as a sub-development area referred to as 'Riverside' and earmarked for residential development.

SSE made representations in response to the Council's Regulation 18 Draft Reading Borough Local Plan 2036 (FDLP) consultation in June 2017. The comments made in those representations have been summarised in the Council's Statement of Consultation (SoC) on the FDLP (November 2017).

Having reviewed the Council's SoC and the PSLP, SSE consider that some of the points raised previously in relation to the allocation under draft Policy CR11g remain unresolved and that these issues could put the deliverability of the policy at risk.

Site

The site is identified on the map below and comprises a rectangular shaped land parcel approximately 1.24 hectares in area. It lies in the Central Reading area and is located to the north of Reading Train Station and the town centre. It is bound by the River Kennet to the north, Norman Place office development to the east, Vastern Road to the residential properties on Lynmouth Road to the west.

The site comprises office accommodation fronting Vastern Road, with operational electrical equipment located centrally. Vehicular access is available from Vastern Road and Lynmouth Road.

The site is in Flood Zone 2 (Medium Probability of Flooding) and as such the Council has undertaken a sequential and exceptions test in accordance with the NPPF.





Scope of Response

These representations focus on draft Policy CR11: *Station/River Major Opportunity Area* and should be read in conjunction with our separate response to draft Policy CR10: *Tall Buildings* dated 26 January 2018.

Where we have suggested changes to Policy CR11, text to be deleted is shown with a ~~strikethrough~~ and new text is shown underlined.

Policy CR11 – Station/River Major Opportunity Area

SSE welcomes the inclusion of a draft site allocation under sub-area Policy CR11g: *Riverside* for residential development, with an indicative density range of 201-298 dph (250-370 units).

However, we have a number of concerns about the specific requirements of the policy and the potential negative impact these may have on the deliverability of the policy and therefore the Council's ability to implement its Local Plan vision for the Station/River Major Opportunity Area.

10m setback from the river

Draft Policy CR11g requires a set back from the river of at least 10m, which is not a requirement of the adopted site allocation¹. No justification for this requirement has been provided in the supporting text or the Council's evidence base. In fact it conflicts with draft Policy EN11: *Waterspaces* and CR3: *Public Realm in Central Reading*, which requires development adjacent to the river to enhance the relationship of buildings to the watercourse and to engage with the waterfront location with active frontages and engaging elevations.

¹ Policy RC1g of the Reading Central Area Action Plan (adopted 2009)

The Council's Statement of Consultation on the FDLP suggests that the 10m requirement is a response to the immediate context, where the Council claims is characterised by existing development set back by 8-9m. In our view this approach prejudices what proposals could come forward on this site, as well as what is and is not an acceptable relationship with the waterfront. This view has been taken by the Council in the absence of any evidence that assesses the particular visual and landscape qualities of the river and its sensitivity to development. In our view, imposition of a 10m setback in the allocation with no evidence to support the approach is both unacceptably restrictive and goes beyond the remit of a Local Plan, which should be dealing only with principles.

This requirement places an unnecessary development constraint on the site which potentially puts at risk other Council objectives to deliver as many homes as possible over the Plan period and to create a north/south connection between the river and town centre. This runs contrary to paragraphs 17, 47 and 58 of the NPPF in failing to make efficient use of land by optimising the development potential of site to boost housing delivery.

Open space at the riverside

Policy CR11g states that any development should continue the north/south pedestrian and cycle link from the station, with *"potential for an area of open space at the riverside"*. SSE would endorse the objectives of the north/south route and the associated green link, but object to the requirement for an area of open space at the riverside, which in their view would place a further development constraint upon the site, putting at risk the other objectives of the Local Plan and draft Policy CR11.

It is acknowledged that the wording only indicates that the open space may be provided, however, Figure 5.3 Station/River Major Opportunity Area Strategy identifies a 'new area of open space'. On this basis, SSE are concerned that this will establish the requirement for an area of formal open space adjacent to the river.

Paragraph 73 of the NPPF states that:

"Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision."

The Council has not provided any evidence to support the requirement for formal open space on the site, which is contrary to the NPPF. On this basis, any open space requirement should be determined as part of a planning application in accordance with draft Policy EN9.

Notwithstanding this, from a review of the Local Plan, and having regard for both existing and planned public open spaces close to the site (i.e. Christchurch Meadows to the north and the new civic spaces to the north and south of the train station), it is clear that the Council has not considered how these open spaces would be complimented by a new space on the site and how this would provide diversity across Reading's open space network. It is our view that the green link requirement of Policy CR11g, presents an opportunity to provide variety in the network and would be of far greater value than a formal open space on the site.

Office and leisure uses

Policy CR11g states that the main use of the site should be residential, but adds that *"some small scale offices and leisure will also be appropriate"*. The indicative site capacity indicates 1,000-2,000 sqm of leisure and no net increase of office floorspace.

The evidence base does not support the provision of non-residential uses on the site. In fact the spatial strategy for Central Reading states at paragraph 3.2.4 that the Local Plan will provide for up to 27,000 sqm of town centre uses, which is a significant reduction from the 40,000 sqm stated in the FDLP (paragraph 3.2.4).

On this basis, there is no evidence to support an approach that would reduce the number of homes delivered on a central Reading site, contrary to paragraph 47 of the NPPF.

Status of north/south route

SSE welcomes the recognition of the north/south pedestrian and cycle link as a Council priority at paragraph 5.4.6 and how this will be a given substantial weight for decision taking purposes. However, Policy CR11g should also recognise the strategic significance of this movement corridor and require the scale of development to be informed by this important status.

On the basis of the above, SSE request that Policy CR11g be amended to ensure that the policy is deliverable and to enable the Council to realise its objectives.

~~“Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from form an appropriate visual and physical relationship with the river. Development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, and its form and scale should respond to the strategic importance of this new connection with potential for an area of open space at the riverside. The main use of the site should be residential, although some complementary small-scale offices and leisure will also be acceptable appropriate.”~~

Site size: 1.24 ha Indicative potential: 250-370 dwellings, 1,000-2,000 sq m of leisure, no significant net gain in offices.”

Conclusion

SSE trust that the comments made in this letter are a helpful contribution to the Local Plan 2036 process. In particular, SSE highlight the requested changes that have been made in order to address aspects of the draft Local Plan that in our view are not robust.

Yours sincerely,

Steven Roberts
Associate

Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title

--

Mr

--

First Name

--

Steven

--

Last Name

--

Roberts

--

Job Title *(if applicable)*

--

--

Organisation *(if applicable)*

Scottish and Southern Energy

Savills

--

Address 1

--

Ground Floor, Hawker House

--

Address 2

--

5-6 Napier Court

--

Address 3

--

Napier Road

--

Town

--

Reading

--

Post Code

--

RG1 8BW

--

Telephone

--

0118 952 0501

--

E-mail

--

Steven.roberts@savills.com

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PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CR11 - Station/River Major Opportunity Area

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please refer to:

Savills letter dated 26 January 2018 - ref: 18.01.26 PSLP Reg 19 Reps on behalf of Scottish and Southern Energy (Policy CR11)

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please refer to:

Savills letter dated 26 January 2018 - ref: 18.01.26 PSLP Reg 19 Reps on behalf of Scottish and Southern Energy (Policy CR11)

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

Scottish and Southern Energy has identified that the Pre-Submission Draft Local Plan will not plan positively for the growth and sustainability objectives of Reading and fails to promote sustainable patterns of development by optimising the development potential of land in Central Reading. It is therefore necessary for the Council to reconsider its approach to the draft allocation at CR11g Riverside to ensure that the Council's objectives are achieved over the plan period.

It is on this basis that Scottish and Southern Energy has requested modifications to Policy CR11 to make it sound and therefore under Section 20(6) of the Planning and Compulsory Purchase Act 2004 requests the opportunity to be heard at the Examination in Public to support the case set out in its representations referred to above.

B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

STAINES, MARK AND RACHAEL

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

CA1b
PART OF READING GOLF COURSE, KIDMORE END ROAD

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Reference : http://www.reading.gov.uk/media/8053/Pre-Submission-Local-Plan-November-2017/pdf/Pre-Submission_Local_Plan_November_2017.pdf

Within this document sections: 8.2 relates and puts the plans into direct conflict with statements made.

8.2.1 (b). Is not achievable. Based on location of planned site.
8.2.1 (e) this proposed plan places more immediate and direct pressure on an area of Outstanding Natural Beauty.
Road infrastructure to the site is significantly restricted on Kidmore End Rd with a single flow of traffic in operation at the upper most end of Kidmore End Rd adjoining the Peppard Rd.

8.2.4 States:
“As a result of the limited development capacity, the overall strategy in this area is largely based around ensuring that, where development is to be accommodated, it is done in a way that prevents adverse effects on the existing areas. Of particular importance in Caversham and Emmer Green are potential effects on landscape, heritage and infrastructure. The relationship of the landscape with the Chiltern Hills and River Thames, described in paragraph 8.1.6, and of

the townscape with the former separate settlements of Caversham and surrounding hamlets, will be preserved.”

This proposed development directly conflicts with the above statement. The local schools do not have sufficient capacity for what could be expected to be an additional 180+* children. The roads and parking availability cannot accommodate the projected 200** cars. This does not take into account site access for Heavy construction vehicles, which would require to navigate through quiet residential roads (single lane in places) and may not have sufficient access.

8.2.5 States:

“The adequacy of infrastructure to support additional development remains one of the most significant concerns in the area. In particular, transport, education and healthcare are issues that would need to be addressed in any development”

The council have already identified that any such development effectively is not viable.

** Estimated figures based on 90 dwellings

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

There are more appropriate sites as referenced within the document that provide a more immediate and viable planning option from an accessibility perspective. However core infrastructure pressures will remain for main road access, schools, doctors surgeries and access to the main arterial roads.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Yes

Please keep me informed of all planning policy matters:

STANHOPE PLC

Our ref: Q20013
Email: sean.bashforth@quod.com
Date: 26 January 2018



Planning Policy
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Dear Sir/Madam,

READING BOROUGH LOCAL PLAN – CONSULTATION ON THE PRE-SUBMISSION DRAFT LOCAL PLAN, NOVEMBER 2017 REPRESENTATIONS ON BEHALF OF STANHOPE PLC

We write on behalf of our client, Stanhope Plc, in respect of the Station Hill site in central Reading. We welcome this opportunity to respond to the Pre-Submission Draft Local Plan document. The Station Hill site is referred to as Site CR11c in the document ('Station Hill & Friars Walk').

The Council will be aware of the planning history of the Station Hill site, and in particular the existing consents which remain in place for its comprehensive redevelopment. These representations have been prepared with regard to that consented position, both to ensure the new Local Plan policies are compatible, and also so that they provide adequate future flexibility.

H4: Build to Rent Schemes

Stanhope Plc supports the inclusion of this policy in principle. It is encouraging that the Council is recognising the contribution that Build to Rent ("BtR") schemes can make in accelerating housing delivery, reflecting the policy support at national level.

In terms of the detailed requirements of draft Policy H4, we set out below specific comments and suggested amendments (using the policy numbering for consistency):

1. The proposed 30 year covenant term is considered unduly restrictive given the recent emergence of BtR as a housing product and its relatively immature position in the market. We would suggest a minimum 15 year period is more appropriate. The key driver for a 15 year covenant (which is also identified in the draft London Plan, preparation of which is similarly advanced when compared to Reading's new Local Plan), relates to attracting large-scale institutional investment into the sector and the type of investment horizons that the funds operate off. The primary concern of including a covenanted period longer than 15 years would be that it would deter investment and funds would be redirected into other assets, and in other locations. It is noteworthy that the recently approved BtR scheme at Kings Meadow / Napier Road is subject to a 20 year covenant period. Paragraph 4.4.32 should also be updated accordingly.



6. We presume the reference to Policy H4 should in fact be Policy H5 (Standards for New Housing).
7. We presume the reference to Policy H2 should in fact be Policy H3 (Affordable Housing). In addition, although it is referenced in Policy H3, it should be made clear here that affordable housing provision within BtR schemes will be subject to viability testing. Furthermore, it is widely recognised that flexibility needs to be applied when considering BtR developments, that in order to maintain the integrity of a unified ownership and management of the homes, the affordable housing provision within a BtR development can be entirely Discounted Market Rent (“DMR”) which can be owned, let and managed by the landlord/operator/institution. Draft Policy H4 refers to ‘Affordable Private Rent’ which should be substituted for DMR, a form of intermediate housing made available for rent at a level at least 20% below market rent (as per the definition being used by Government). The accompanying text should also be clarified insofar as the affordable housing element will be offered as DMR (and not capped at Local Housing Allowance levels), therefore allocation of eligible households would not come from Reading’s social housing waiting list, but could come from an intermediate housing waiting list, which is the approach being taken elsewhere, e.g. Southwark.

CR1: Definition of Central Reading

Stanhope Plc supports the Council’s definition of Central Reading.

CR6: Living in Central Reading

The draft policy sets out a suggested housing mix specifically for the Central Reading area – this approach is supported to differentiate the locational context and residential market requirements for this part of the Borough. With that in mind, it should be noted that Central Reading is generally not suitable for family housing, and that the target housing mix is flexible and should be considered on a site by site basis.

CR7: Primary Frontages in Central Reading

The designated primary frontages (existing) shown on the draft proposals map within CR11c bear no resemblance to the existing situation or building frontages and should therefore be removed. The designated primary frontages (proposed) could be shown insofar as they correlate with the approved parameter plans under the extant Station Hill consent. Furthermore, active building frontages should not necessarily need to include a display window or glazed frontage at ground floor level – this wording should be deleted.

CR10 – Tall Buildings

The draft policy defines tall buildings as over 36m in height, whilst the boundary of the ‘areas of potential for tall buildings’ lies through the middle of the Station Hill Site, excluding the southern plots. However, the Council has already considered it acceptable for taller buildings outside of this zone, whereby the extant permission has approval for buildings of up to 45m in height within the southern plots of the Site. The policy should therefore be relaxed, with part i) of the policy reworded to ‘tall buildings will generally only be appropriate...’



The supporting text relating to sustainable design and construction (paragraph 5.3.46) refers to narrow span floor plates improving the availability of daylight and reducing the need artificial light. It is important to also recognise, however, that larger floorplates allow buildings to be more efficiently laid out, permitting efficiencies in construction and can be more efficient to heat. High density and tall buildings located adjacent to transport interchanges, such as Site CR11, are also inherently sustainable because of their central location which can be served by public transport and take advantage of the proximity of other uses in the town centre.

CR11: Station/River Major Opportunity Area

Stanhope Plc supports the Council's aspirations for the Station/River Major Opportunity Area.

We welcome the suggested increase in the number of dwellings identified for the site, noting that its upper range goes beyond that of the extant consented position.

However, the proposed dwelling numbers should not be regarded as a cap, and the policy text should reflect the fact that high density development is appropriate in the town centre, and that sustainably located sites such as Station Hill should optimise the quantum of housing delivery, with due regard to all other relevant planning policies, without an artificial constraint on density or overall housing numbers, in order to ensure that the Borough meets or exceeds its housing targets in the most sustainable locations. Furthermore, the policy does not recognise the retail and leisure floorspace already approved under the extant Station Hill consent (up to 13,500sqm retail and up to 2,000sqm leisure floorspace).

It is unclear why specific mention has been made to single level north-south links. It would be clearer if the policy, instead, refers to providing ground floor links.

Concluding Remarks

We would be grateful if you could confirm receipt of these representations. We trust that the above comments will be considered as part of the ongoing evolution of the Reading Local Plan and that you keep us informed of the progress of the document.

Yours faithfully,

Sean Bashforth
Director

enc.
cc.

Reading Borough Council
 Pre-Submission Draft Local Plan
 November 2017
 Representations Form



Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title

--

Mr

Sean

First Name

--

Last Name

--

Bashforth

Job Title *(if applicable)*

--

Director

Organisation *(if applicable)*

--

Quod

Address 1

--

Ingeni Building

Address 2

--

17 Broadwick Street

Address 3

--

Town

--

London

Post Code

--

W1F 0DE

Telephone

--

020 3597 1000

E-mail

--

sean.bashforth@quod.com

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy H4

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Policy H4, part 1:
The proposed 30 year covenant term is considered unduly restrictive given the recent emergence of BtR as a housing product and its relatively immature position in the market. We would suggest a minimum 15 year period is more appropriate. The key driver for a 15 year covenant (which is also identified in the draft London Plan, preparation of which is similarly advanced when compared to Reading’s new Local Plan), relates to attracting large-scale institutional investment into the sector and the type of investment horizons that the funds operate off. The primary concern of including a covenanted period longer than 15 years would be that it would deter investment and funds would be redirected into other assets, and in other locations. It is noteworthy that the recently approved BtR scheme at Kings Meadow / Napier Road is subject to a 20 year covenant period. Paragraph 4.4.32 and Part 1 of Policy H4 should also be updated accordingly.

Policy H4, part 6:
We presume the reference to Policy H4 should in fact be Policy H5 (Standards for New Housing).

Policy H4, part 7:
We presume the reference to Policy H2 should in fact be Policy H3 (Affordable Housing). In addition, although it is referenced in Policy H3, it should be made clear here that affordable housing provision within BtR schemes will be subject to viability testing. Furthermore, it is widely recognised that flexibility needs to be applied when considering BtR developments, that in order to maintain the integrity of a unified ownership and management of the homes, the affordable housing provision within a BtR development can be entirely Discounted Market Rent (“DMR”) which can be owned, let and managed by the landlord/operator/institution. Draft Policy H4 refers to ‘Affordable Private Rent’ which should be substituted for DMR, a form of intermediate housing made available for rent at a

level at least 20% below market rent (as per the definition being used by Government). The accompanying text should also be clarified insofar as the affordable housing element will be offered as DMR (and not capped at Local Housing Allowance levels), therefore allocation of eligible households would not come from Reading's social housing waiting list, but could come from an intermediate housing waiting list, which is the approach being taken elsewhere, e.g. London Borough of Southwark

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please see above comment and cover letter.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

Reading Borough Council
 Pre-Submission Draft Local Plan
 November 2017
 Representations Form



Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title

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Mr

--

First Name

--

Sean

--

Last Name

--

Bashforth

--

Job Title *(if applicable)*

--

Director

--

Organisation *(if applicable)*

--

Quod

--

Address 1

--

Ingeni Building

--

Address 2

--

17 Broadwick Street

--

Address 3

--

--

Town

--

London

--

Post Code

--

W1F 0DE

--

Telephone

--

020 3597 1000

--

E-mail

--

sean.bashforth@quod.com

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PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CR1

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Stanhope Plc supports the Council's definition of Central Reading.
--

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please see above comment and cover letter.
--

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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B6. If you wish to appear in person, please briefly outline why you consider this necessary.

B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

Reading Borough Council
 Pre-Submission Draft Local Plan
 November 2017
 Representations Form



Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title

--

Mr

Sean

First Name

--

Last Name

--

Bashforth

Job Title *(if applicable)*

--

Director

Organisation *(if applicable)*

--

Quod

Address 1

--

Ingeni Building

Address 2

--

17 Broadwick Street

Address 3

--

Town

--

London

Post Code

--

W1F 0DE

Telephone

--

020 3597 1000

E-mail

--

sean.bashforth@quod.com

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CR6

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

The draft policy sets out a suggested housing mix specifically for the Central Reading area – this approach is supported to differentiate the locational context and residential market requirements for this part of the Borough. With that in mind, it should be noted that Central Reading is generally not suitable for family housing, and that the target housing mix is flexible and should be considered on a site by site basis.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please see above comment and cover letter.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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B6. If you wish to appear in person, please briefly outline why you consider this necessary.

B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

x

Please keep me informed of all planning policy matters:

x

Reading Borough Council
 Pre-Submission Draft Local Plan
 November 2017
 Representations Form



Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title

--

Mr

--

First Name

--

Sean

--

Last Name

--

Bashforth

--

Job Title *(if applicable)*

--

Director

--

Organisation *(if applicable)*

--

Quod

--

Address 1

--

Ingeni Building

--

Address 2

--

17 Broadwick Street

--

Address 3

--

--

Town

--

London

--

Post Code

--

W1F 0DE

--

Telephone

--

020 3597 1000

--

E-mail

--

sean.bashforth@quod.com

--

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CR7

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

The designated primary frontages (existing) shown on the draft proposals map within CR11c bear no resemblance to the existing situation or building frontages and should therefore be removed. The designated primary frontages (proposed) could be shown insofar as they correlate with the approved parameter plans under the extant Station Hill consent. Furthermore, active building frontages should not necessarily need to include a display window or glazed frontage at ground floor level – this wording should be deleted.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please see above comment and cover letter.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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B6. If you wish to appear in person, please briefly outline why you consider this necessary.

B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

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First Name

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Sean

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Last Name

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Bashforth

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--

Quod

--

Address 1

--

Ingeni Building

--

Address 2

--

17 Broadwick Street

--

Address 3

--

--

Town

--

London

--

Post Code

--

W1F 0DE

--

Telephone

--

020 3597 1000

--

E-mail

--

sean.bashforth@quod.com

--

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CR10

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

The draft policy defines tall buildings as over 36m in height, whilst the boundary of the ‘areas of potential for tall buildings’ lies through the middle of the Station Hill Site, excluding the southern plots. However, the Council has already considered it acceptable for taller buildings outside of this zone, whereby the extant permission has approval for buildings of up to 45m in height within the southern plots of the Site. The policy should therefore be relaxed, with part i) of the policy reworded to ‘tall buildings will generally only be appropriate...’

The supporting text relating to sustainable design and construction (paragraph 5.3.46) refers to narrow span floor plates improving the availability of daylight and reducing the need artificial light. It is important to also recognise, however, that larger floorplates allow buildings to be more efficiently laid out, permitting efficiencies in construction and can be more efficient to heat. High density and tall buildings located adjacent to transport interchanges, such as Site CR11, are also inherently sustainable because of their central location which can be served by public transport and take advantage of the proximity of other uses in the town centre.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please see above comment and cover letter.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

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Title

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Mr

Sean

First Name

--

Last Name

--

Bashforth

Job Title *(if applicable)*

--

Director

Organisation *(if applicable)*

--

Quod

Address 1

--

Ingeni Building

Address 2

--

17 Broadwick Street

Address 3

--

Town

--

London

Post Code

--

W1F 0DE

Telephone

--

020 3597 1000

E-mail

--

sean.bashforth@quod.com

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CR11

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Stanhope Plc supports the Council’s aspirations for the Station/River Major Opportunity Area.

We welcome the suggested increase in the number of dwellings identified for the site, noting that its upper range goes beyond that of the extant consented position.

However, the proposed dwelling numbers should not be regarded as a cap, and the policy text should reflect the fact that high density development is appropriate in the town centre, and that sustainably located sites such as Station Hill should optimise the quantum of housing delivery, with due regard to all other relevant planning policies, without an artificial constraint on density or overall housing numbers, in order to ensure that the Borough meets or exceeds its housing targets in the most sustainable locations. Furthermore, the policy does not recognise the retail and leisure floorspace already approved under the extant Station Hill consent (up to 13,500sqm retail and up to 2,000sqm leisure floorspace).

It is unclear why specific mention has been made to single level north-south links. It would be clearer if the policy, instead, refers to providing ground floor links.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please see above comment and cover letter.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

STUART, DR RANALD

From: Ranald Stuart
Sent: 23 January 2018 23:27
To: Planning Policy
Subject: Reference Local Plan Section EN7N Item EN7Nn

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

Dear Sir / Madam

Reference Local Plan Section EN7N Item EN7Nn

Please can you answer the following questions with reference to the proposed new local plan:

1. Why is Reading Borough Council disregarding the current local plan and instead choosing to give support to the proposals by the ESFA to build a primary school on Mapledurham Playing Fields (MPF)?

2. Why would the council do this when MPF is held in trust in perpetuity for the sole use of "recreation" as stated in the title deeds for the land bequeathed by Mr Charles Hewitt, Solicitor in 1938? This land is also a designated Green Space.

3. How will the new Local Plan be strengthened to overcome any future threats to green open space, especially when that land is held in trust?

4. If the EFSA proposal is accepted, please explain how the new Local Plan will protect Mapledurham Playing Fields from the effects of:

- completely changing the size and character of a beautiful park forever, when Reading has below the national average of green space?
- significantly increased local traffic on the already busy A4074?
- increased air, light and noise pollution from the traffic affecting the local residents and park users?
- increased air, light and noise pollution from the school and its users affecting local residents and park users?
- impact on Mapledurham Tennis Club and its 160 members?
- impact upon Caversham Trents Football teams which regularly use the oversubscribed football pitches?
- impact upon other users of the Playing Fields, who go to the Fields for recreation as was legally specified by Mr Hewitt?
- impact upon the Fields by the presence of a large modern building overbearing the current site?
- impact upon the privacy and character of local properties?

5. As conflicted trustees of Mapledurham Playing Fields, why precisely and in all sincerity are Reading Borough Council not adhering to the current Local Plan which would help to protect Mapledurham Playing Fields from the proposals of the EFSA?

6. Why are Reading Borough Council not developing the site of Caversham Primary School which would amply cater for the number of children proposed? Caversham Primary School is the epicentre of where the majority of potential school pupils currently live - why would the Council choose to build the school in the furthest periphery of the catchment area, 1 mile from the

epicentre of the catchment area in central Caversham, which would mean children walking or being driven up a steep hill and across a busy A-road to reach MPF?

7. If intent upon building a new school, why don't Reading Borough Council build it in Hemdean Bottom, a site that they already own, sited in the centre of the catchment area and where the Council had originally planned to build a new school in the 1990s? It could have been built by now!

I request that my questions and comments are also given to the independent Inspector appointed to examine the proposed new Local Plan. Please send confirmation when this has been undertaken.

I do not enjoy having to write to object in this fashion, but such is the anger that the EFSA proposals have caused in the local community around MPF; I regret to say that the way that senior council officials have repeatedly behaved in this process over the past few years has been shameful.

Yours truly

Dr Ranald Stuart

Click [here](#) to report this email as spam.

STUDIOUS CONSTRUCTION LTD

Reading Borough Council
 Pre-Submission Draft Local Plan
 November 2017
 Representations Form



Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title

--

Mr

Mr

First Name

--

Craig

Craig

Last Name

--

Pettit

Pettit

Job Title *(if applicable)*

--

Senior Planner

Senior Planner

Organisation *(if applicable)*

Studios Construction
(Reading) Ltd.

Studios Construction (Reading) Ltd.
--

Barton Willmore

Barton Willmore

Address 1

--

The Blade

The Blade

Address 2

--

Abbey Square

Abbey Square

Address 3

--

--

Town

--

Reading

Reading

Post Code

--

RG1 3BE

RG1 3BE

Telephone

--

--

E-mail

--

craig.pettit@bartonwillmore.co.uk

craig.pettit@bartonwillmore.co.uk
--

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Draft Policies H12, OU1, CR13a, ER2 and the supporting text to each. Comments are also made regarding the Local Plan's evidence base.

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please refer to the accompanying representations, specifically Section 4.0 with regard to legal compliance, soundness and duty to co-operate.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please refer to our commentary within the accompanying representations for full context, however in summary it is considered that the following amendments to draft policy H12 would alleviate most of the concerns that have been highlighted:

“New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation, ...or in other sustainable locations with convenient access via walking, cycling, or public transport modes, to services, facilities and places of study.”

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

Please consider the information contained within the accompanying representations.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

Reading Borough Council Pre-Submission Draft Local Plan Regulation 19 Consultation (November 2017)

Representations on behalf of Studios Construction Reading Ltd

January 2018

**Reading Borough Council
Pre-Submission Draft Local Plan
Regulation 19 Consultation (November 2017)**

Representations submitted on behalf of Studios

Project Ref:	26550/A5	26550/A5
Status:	Draft	Final
Issue/Rev:	P3	P3a
Date:	23 rd January 2018	25 th January 2018
Prepared by:	Craig Pettit	Craig Pettit
Checked by:	Kim Cohen / Nick Paterson-Neild	Kim Cohen

The Blade
Abbey Square
Reading
Berkshire. RG1 3BE

Tel: 0118 943 0000
Fax: 0118 943 0001
Email: planning@bartonwillmore.co.uk

Ref: 26550/P3a/A5/CP

Date: 25th January 2018

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2.0 Overview and Critique	3
3.0 Accordance with national and local policy	11
4.0 Summary, conclusion and recommendations	13

1.0 INTRODUCTION

- 1.1 Barton Willmore LLP (BW) is instructed by Studios Construction Reading Ltd (our Client) to submit representations to the Reading Borough Council (the Council) Pre-Submission Draft Local Plan Regulation 19 consultation; herein referred to as 'the Local Plan'.
- 1.2 Studios are keen to ensure that the Local Plan is sound, legally compliant and most importantly sustainable with regard to the aims of its policies. Consequently, whilst comments will be made regarding the Local Plan as whole, the focus of these representations will be the policies and approach taken, relating to student accommodation.

About Studios

- 1.3 Our client is experienced within the student accommodation sector and has a proven track record of building suitable and sustainable accommodation for students. Our client has also been awarded various awards and is a prominent student accommodation provider with an extensive countrywide portfolio based on sustainable brand values and management support systems.
- 1.4 At the time of writing, our client has successfully obtained two prior approval applications to convert redundant office space into C3 accommodation and is currently in the process of promoting an application for a new purpose built student accommodation building, both of which are within Reading town centre.

Scope of Submission

- 1.5 Studios are in broad support of the Local Plan and is keen to work with the Council to ensure that it is found sound under the tests of soundness enshrined within the National Planning Policy Framework (NPPF). Notwithstanding this, Studios have a number of objections to make in relation to draft policies and indeed also provide some suggested changes, in the interests of sound planning. This is discussed further within Section 2 of these representations.
- 1.6 Our client is aware that these representations will feed into the public examination of the Local Plan. Therefore commentary made herein focusses particularly on the issues of legal compliance, soundness and duty to co-operate.

1.7 Within this submission we therefore consider the below in the following sections:

- 1.7.1 Within **Section 2** we provide an overview and critique of the Local Plan as a whole, with a particular focus on policies associated within student accommodation. We also refer to the Sustainability Appraisal accompanying the Local Plan and other elements of the associated evidence base as necessary.
- 1.7.2 Within **Section 3**, we provide comments in relation to how the Local Plan accords with National Policy and the Local Policies of neighbouring authorities, namely Wokingham Borough. In this section the strategic context of the Local Plan will be considered.
- 1.7.3 **Section 4** sets out our concluding remarks, summarises our client's position and introduces the changes which our client feels are necessary, to ensure the Plan is found sound.

2.0 OVERVIEW AND CRITIQUE

Draft policy H12: Student Accommodation

2.1 On page 94 of the draft Local Plan, the Council introduce a new policy aimed at directing and restricting where student accommodation is provided. This is in contrast to currently adopted policies where the provision of student accommodation is not restricted.

2.2 Specifically the proposed policy states:

“New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation. There will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites.”

2.3 The supporting text to the draft policy at 4.4.95 confirms the importance of sufficient student accommodation being provided to enable students to live close to where they study. Paragraph 4.4.96 of the supporting text notes a clear disparity between the SHMA 2016 and more recent evidence from the University:

“The SHMA (2016) looked at the issue of need for additional student housing. It anticipates a growth in student numbers at the University of Reading from 13,135 in 2015 to 16,095 in 2018. However, the SHMA notes that, as this is in line with historic high student numbers, that [sic] it should not result in the need for significant new accommodation. More recent evidence from the University indicates that this growth will indeed generate a need for new accommodation.”

2.4 The supporting text to draft policy H12 does not however explore the University’s evidence in detail. We note that in fact evidence supplied by the University in relation to a previous planning application, considers licensed HESA data along with University forecasts and submits that there is a calculated demand pool, as of November 2017, of two students to every bed available. This clearly indicates a need for additional accommodation supply to meet demand and currently results in a larger than average proportion of students needing to find accommodation in the private rented sector. Indeed, evidence from previous years has suggested that undergraduates have deferred their place at Reading University or accepted a place at another institution, due to the fact that they have been unable to secure accommodation. We understand that the University have previously

- noted that large numbers of students have needed to be housed in hotels on a temporary basis during peak times.
- 2.5 Information from a previous University application also suggests that, for the last 4 years, there has been a waiting list of over 700 students for bed spaces.
- 2.6 Moreover, our client submits that in relation to information concerning their current student accommodation interests, there have been waiting lists noted and consistently demand appears to exceed supply.
- 2.7 It is understood that the University distinguishes the private rental sector, relating mainly to Houses in Multiple Occupation (HMO's), from that of private purpose-built student accommodation (PBSA). It is our understanding that even with private sector PBSA, large numbers of students are still forced to look to the local private rental market for accommodation.
- 2.8 It can be concluded therefore that unless student accommodation needs are met via dedicated means, the pressure on the housing market will still be applied, reducing the availability of housing for families; the very opposite of Reading Borough Council's housing objectives for the future.
- 2.9 Draft policy H12 concludes that the arising need should be met *"...on campus or through reconfiguration and redevelopment of existing halls of residence..."*. It is unclear however whether the Council have sought the University's view on this, primarily as to whether there is sufficient land on campus, or sufficient expansion opportunities at existing sites, to facilitate the required amount of new student accommodation. Moreover, it is also unclear whether any such land would not already be safeguarded by the University for the potential future expansion of education facilities.
- 2.10 On behalf of our client Studios, we invite the Inspector to consider in detail the exact wording of draft policy H12. We would submit that the following wording would sustainably achieve the need for student accommodation, whilst providing governance for the Borough Council (underlined and italicised where amended):

"New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation, *or in other sustainable locations with convenient access via walking, cycling, or public transport modes, to services, facilities and places of study.*"

Draft policy OU1: New and existing community facilities

2.11 We note that the Council are potentially restricting future expansion of education facilities within the draft Local Plan on page 115 under draft policy OU1. The draft policy states:

“Proposals for additional development for further and higher education will only be acceptable where it can be demonstrated that additional students can be housed in existing or planned student accommodation.”

2.12 In summary therefore, the University will need to provide for higher education facilities and space on campus. Furthermore, the University may not be able to achieve proposals for additional development, if students cannot be housed in existing or planned student accommodation, on or adjoining the Campus, as the policy does not support student accommodation in other sustainable locations which may be able to serve the demand for student accommodation elsewhere. Policies H12 and OU1 therefore not only restrict student accommodation, but their interrelationship may also restrict future expansion possibilities at the University. We see this relationship underlined in the supporting text to policy OU1, wherein it states:

“...applications for academic development that would bring additional students to live in Reading must be paired with a corresponding increase in dedicated accommodation. This should be on existing campuses or existing student accommodation sites, in line with policy H12.”

Draft Policy CR13a: Reading Prison

2.13 In contrast to the aforementioned policies, we note policy CR13a Reading Prison, states:

“The building would be used for residential or student accommodation...”

2.14 This does not seem to be consistent with the emerging policies of plan, as the prison is not on or adjacent to an existing further or higher education campus. Whilst our client does not seek to object to draft policy CR13a in its entirety, Studios do wish to communicate the need for the Local Plan to be consistent, particularly within its own policies, in order to be found sound. This highlights the inconsistencies within the Council's approach, as it is assessed as a sustainable location, however one which does not conform with draft policy H12.

Draft Policy ER2: Whiteknights Campus, University of Reading

2.15 Draft policy ER2 states:

“Where development would result in the need for additional students to be housed in Reading, it should be supported by a corresponding increase in student accommodation. Provision of new student accommodation on the Whiteknights Campus, or as a reconfiguration or extension of nearby dedicated accommodation, will therefore be acceptable subject to other policies in the Plan.”

2.16 Whilst not explicit within draft policy ER2, as this relates specifically to the main Campus for the University, it is considered that in accordance with the aforementioned draft policy H12, the Whiteknights Campus will be the focus for future student accommodation. However, draft policy ER2 comments on a number of constraints associated with the Campus, at paragraph 9.3.9:

“The site is on the site of the 19th century Whiteknights Park, and includes a significant amount of parkland, woodland and lakes. Its attractive surroundings are part of the pull of the university, but also offer a number of constraints to development. Parts of the site have significant wildlife importance, and the area is a prominent part of the local landscape...A number of listed buildings are on site, and the campus is surrounded by residential areas.”

2.17 Based on the above overview of the University's main Campus therefore, it would appear that there are constraints to the apparent focus of emerging policies H12, OU1 and ER2 to largely restrict all related development of the scale that will be required to the Campus itself. It is considered that in line with the directions of draft policies H12 and OU1, this restricts the ability of the University to expand. Our client further notes that paragraph 9.3.9 states approximately two thirds of the Campus is within Wokingham Borough **“...meaning that a consistent approach is required”**. This is considered in more detail within Section 3.

Sustainability Appraisal

2.18 In order to understand the Council's evidence and reasoning behind the inclusion of policy H12, it is necessary to interrogate the Sustainability Appraisal which accompanies the draft Local Plan.

2.19 Studios note that the draft policies within the emerging Local Plan are assessed against the 20 environmental, social and economic objectives contained within Table 2 on page 11 of the Sustainability Appraisal. Our client further notes that three options were tested in relation to draft policy H12, namely:

- H12(i): No policy
 - H12(ii): Locate student accommodation throughout the Borough
 - H12(iii): Focus student accommodation close to the university and on campus if possible
- 2.20 Currently within Reading's adopted Development Plan, there is not a specific policy which relates to student accommodation. This therefore is most closely aligned with option i above.
- 2.21 With regard to options ii and iii, we would initially note that option iii does not reflect the wording proposed by draft policy. Draft policy H12 uses the term 'on or adjacent to' where as option iii uses the term 'close to' and 'if possible'. As the term 'close to' could be interpreted as being a sustainable distance from, rather than immediately adjacent to, it is considered that the sustainability appraisal may not directly relate to the policy wording. Indeed, our client would support the intention of the wording contained within the sustainability appraisal, as it would suggest potential for those sites which are within a sustainable distance to the University. If the Council are therefore to stand by the results of their sustainability appraisal, then the wording of draft policy H12 should be amended accordingly. This is covered in more detail within the conclusions to these representations.
- 2.22 Considering the assessment in detail it is noted that each option tested scores a neutral ('0') score on all but 5 of the sustainability objectives. The 5 objectives affected are:
- 4) Minimise the consumption of, and reduce damage to, undeveloped land.**
 - 9) Create, enhance and maintain attractive and clean environments including protecting and, where appropriate, enhancing landscape and townscape character.**
 - 13) Ensure high quality housing of a type and cost appropriate to the needs of the area.**
 - 16) Avoid significant negative effects on groups or individuals with regard to race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex or sexual orientation.**
 - 20) Maximise access for all to the necessary education, skills and knowledge to play a full role in society and support the sustainable growth of the local economy.**

Option i – No policy

- 2.23 With regard to option i, the sustainability appraisal attributes a 'tendency to be negative score' ('?X') to objectives 4 and 9, and a 'negative score' ('X') to objectives 13, 16 and 20. The sustainability appraisal states that without guidance for student accommodation, it could **"...lead to excessive student accommodation within the town centre"** and that it **"...may also drive development outside the town centre on undeveloped land"**. Studios recognises the need to have a policy in place with regard to student accommodation and whilst there is no evidence to support the claims of the sustainability appraisal, indeed most student accommodation is focussed within the town centre and in close proximity to the University, it is recognised that the risk is present and therefore the scores attributed to Option i are justified.

Option ii – Locate student accommodation throughout the borough

- 2.24 The sustainability assessment considers locating student accommodation throughout the borough would result in a **"...tendency towards positive effects with regard to education"**, attributing a 'tendency to be positive' ('?✓') score with regard to objective 20. Our client considers that this is a conservative score as there is no evidence to suggest that the ability to provide student accommodation throughout the borough, would be anything less than 'positive' ('✓') in relation to maximising access to education and supporting sustainable growth. Indeed it would promote choice and ensure that students and the part-time jobs that they might hold, are not exclusively located on or adjacent to the University.
- 2.25 The assessment further considers that an **"...overprovision of student accommodation may occur in areas where sites are better suited for general housing needs. This would bring negative effects with regard to housing (13) and a tendency towards effects in relation to undeveloped land (4) and townscape character (9)"**. Accordingly, the sustainability appraisal attributes a 'negative' ('X') score with regard to objective 13, a 'tendency to be negative' ('?X') score with regard to objective 4, and 'tendency to be negative' ('?X') score with regard to objective 9. Our client considers that there are some inconsistencies between option ii and option iii, as explained further below.

Option iii – Focus student accommodation close to the university and campus if possible

2.26 The sustainability assessment, with regard to objectives 4, 9, 13, 16, and 20, attributes a 'positive' ('✓') score for all. The sustainability appraisal argues that the reason for the positive increase to objectives 4, 9 and 13, when considered against option ii, is that **"...more sites in the town centre are made available for housing needs. This would bring positive impacts with regard to use of undeveloped land (4), townscape character (9), housing (13)..."**. It is considered however that the sustainability appraisal does not take account of the possible negative effects associated with having student accommodation concentrated in one area.

2.27 It has been established within the Local Plan, as referred to above, that the University's Whiteknights Campus is constrained and it follows therefore that some of the future student accommodation developments may be focused on land 'adjacent to' the Campus, rather than on the Campus itself; taking draft policy H12 as currently written. However, the Whiteknights Campus is surrounded by established residential areas populated with housing of a range of types and styles, which may not be appropriate for high density student accommodation and therefore the policy should give greater support for other sustainable locations, where a more flexible approach for density can be achieved whilst respecting the character of its surroundings. Consequently it is likely that more housing will be converted into Houses of Multiple Occupation (HMO's) to account for the student demand. Arguably this will have a far greater detrimental impact on the availability of 'general' housing, as endorsed by paragraph 4.4.58 of the draft Local Plan:

"Conversions either individually or cumulatively, can also have a harmful impact on the character of the area through unduly diluting mixed and sustainable communities. In certain parts of the Borough, there are high concentrations of flat conversion and houses in multiple occupation, in part reflecting the very high student population which is especially prevalent around the University. Given that students are predominantly present during term time only, it can leave roads and areas feeling quite dormant at other times, failing to achieve a mixed and sustainable community."

2.28 This would appear to sit in contrast to policy H12, which seeks to direct student accommodation adjacent to University Campuses and therefore create a concentration of students. The Council should be clear on whether they consider this to be a positive or negative situation, and ensure consistency within the text of the Local Plan.

2.29 Moreover, it would appear that the student population within East Reading is already prolific and noted as being an issue within paragraph 9.1.5 of the draft Local Plan:

"...East Reading's population is boosted by thousands of students...this boosts the vibrancy of the area, but can also lead to tensions with permanent residents."

- 2.30 To conclude therefore, our client considers that the sustainability appraisal is skewed and inconsistent with how the effects on the 20 objectives are assessed, in relation to draft policy H12. Moreover it is strongly considered that the main element draft policy H12 to be assessed in detail, is that of reducing student accommodation within the town centre. However, the policy and sustainability appraisal do not properly address the opposite element of draft policy H12; the impact of directing student accommodation to only one area of Reading.
- 2.31 The centre of Reading lends itself to high density student accommodation, due to the access to goods and services, its proximity to the University Campus, the ability for purpose built student accommodation blocks to knit more sympathetically with the townscape, the ability for redundant office spaces to be revitalised and the ability to create car free accommodation for users who typically do not rely on car transportation.
- 2.32 Moreover, our client considers that habitually, students are more likely to venture into the centre of Reading when they are within close proximity, rather than when they are not. Economically therefore, Reading may see a higher activity rate within its town centre from students who live closer, than those who do not.
- 2.33 With regard to commerciality, our client is concerned that draft policy H12, as written, would not only restrict deliverability for the reasons noted above, but would also begin to restrict access to the purpose built student accommodation market for private developers, and therefore create an oligopoly due to the potential reliance on the University to release land. The consequence of this outcome would be a both a reduction in supply and the choice on offer to students, which is considered to be an undesirable outcome for all.

3.0 ACCORDANCE WITH NATIONAL AND LOCAL POLICY

National Planning Policy Framework (2012)

- 3.1 The National Planning Policy Framework ('the Framework') was published on 27th March 2012 and replaced most of the previous Planning Policy Statements and Planning Policy Guidance Notes. The Framework establishes that while planning decisions should be taken in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, they should also be made in the context of a presumption in favour of sustainable development. Paragraph 14 of the Framework is important and highlights the fact that at the heart of the Framework there is a presumption in favour of sustainable development. It states:

"...a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking."

- 3.2 In addition paragraph 15 of the Framework states:

"Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that guide how the presumption should be applied locally."

- 3.3 With regard to examining Local Plans paragraph 182 of the Framework states that in order for a plan to be found 'sound', it should be positively prepared, justified, effective and consistent with national policy.

Wokingham Development Plan

- 3.4 Wokingham Borough Council are currently working on a Local Plan Update which will refine the current Core Strategy from 2006 to 2026, to provide the strategy for the Borough. Currently however the development plan for Wokingham Borough consists of, inter alia, the Core Strategy and the Managing Development Delivery Local Plan. It is noted that two thirds of Reading University's Whiteknights Campus is located within Wokingham Borough, therefore with regard to draft policies within Reading Borough Council's Regulation 19 pre-submission Local Plan, it is important to consider whether the document passes the 'duty to co-operate' test.

- 3.5 With regard to the Wokingham Borough Adopted Core Strategy Development Plan Document (2010), it is noted that whilst reference is made to the University, there is no specific wording in relation to student accommodation and therefore no relative policy.
- 3.6 With regard to the Wokingham Borough Adopted Managing Development Delivery Local Plan (2014), the University is referenced in more detail and throughout the document. Policy TB14: Whiteknights Campus is specifically concerned with the University's main Campus and notes that it "...will continue to be a focus for development associated within the University of Reading".
- 3.7 Whilst therefore our client notes that there are no policies which specifically direct student accommodation, there also appears to be no evidence to suggest that Reading Borough Council has co-operated with Wokingham Borough Council in this regard. Given the local authority boundaries run through the Whiteknights Campus, this would seem imperative to the formation of policy H12. It is considered therefore that Reading Borough Council have failed in their legal obligation to co-operate with their neighbouring authority.

4.0 SUMMARY, CONCLUSION AND RECOMMENDATIONS

4.1 Studios are aware that the purpose of the forthcoming examination is to find out in the Inspectors view, whether or not the plan is sound, legally compliant and fulfils the duty to co-operate. To aid the Inspector and to conclude these representations, we have therefore provided our conclusions under the 3 tests below.

Legal compliance

4.2 Studios consider that the plan has been prepared with regard to all relevant legislation and therefore offer no comment.

Soundness

4.3 Studios consider that as drafted, the regulation 19 pre-submission draft Local Plan is unsound, in accordance with paragraph 182 of the National Planning Policy Framework 2012. Our client would therefore invite the Inspector to consider the following:

- **Positively prepared** – as noted within these representations it is considered that, in particular, draft policy H12 restricts development which would otherwise be considered sustainable and is therefore not consistent with achieving sustainable development. The plan has therefore not been positively prepared.
- **Justified** - as noted within these representations, particularly in relation to draft policy H12, it is not considered that the sustainability appraisal accurately assesses the alternative options. Moreover, it is further considered that the conclusions of the sustainability appraisal differ from the final wording of draft policy H12. The plan is not therefore justified.
- **Effective** – our client considers that the objectives of the plan are not deliverable, based on the identified shortfalls in relation to draft policy H12. Moreover, as noted within these representations, the Local Plan contradicts itself within its own policies and as a result the delivery of certain other policies is also questionable. The plan is therefore not effective.
- **Consistent with national policy** – for the reasons set out in these representations the plan does not enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. The plan is therefore not consistent with national policy.

Duty to co-operate

- 4.4 Studios consider that based on an assessment of the draft Local Plan, there is no evidence to suggest that Reading Borough Council have co-operated with Wokingham Borough Council and therefore it is submitted that Reading Borough Council have failed in their legal duty to co-operate with other local authorities, i.e. Wokingham Borough Council in this regard.

Conclusion and recommendation

- 4.5 Our client is therefore unable to support the draft Local Plan as currently drafted. However, we would like to invite the Inspector to consider the following addition to the wording of draft policy H12:

*“New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation, ... **or in other sustainable locations with convenient access via walking, cycling, or public transport modes, to services, facilities and places of study.**”*

- 4.6 The addition of the suggested wording above is considered to allow sustainable development to take place, meet the demands of the student need for housing and not conflict with other policies within draft Local Plan. The above wording amendment also better reflects the assessment of the sustainability appraisal.

SURREY COUNTY COUNCIL

From: James Greene EI <james.greene@surreycc.gov.uk> on behalf of Planning Consultations/EAI/SCC <planning.consultations@surreycc.gov.uk>
Sent: 04 January 2018 14:28
To: Planning Policy
Subject: Reading Borough Local Plan – chance to comment on Pre-Submission Draft Local Plan

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

Dear Sir/Madam,

Thank you for consulting Surrey County Council on the Pre-Submission Draft Local Plan. We have no comments to make on this document.

Kind regards,

James Greene
Spatial Planning Officer
Spatial Planning & Policy
02085419377

* * * * *

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* * * * *

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T.A. FISHER

From: Mark Schull <mark@arrowplanning.co.uk>
Sent: 21 December 2017 08:44
To: Planning Policy
Subject: Pre-Submission Local Plan Proposals Map Drafting Error in respect of Policy CA1d
Attachments: RBC Local Plan Extract CA1d.png

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

Dear Mark

We write on behalf of our clients TA Fisher in respect of the Pre-Submission Draft Local Plan. Our clients own land at Overton Drive included within the proposed allocation CA1d.

We have noted a drafting error in the proposals map which needs to be amended. The policy states that access will be taken from Overton Drive. However, as can be seen in the attached extract from the Map, the southern part of the allocation does not extend to Overton Drive. Instead the southern parcel of the allocation stops some way short of Overton Drive. Our clients therefore request that the proposals map is amended so that the allocation extends to Overton Drive, as is the case with the northern part of the allocation.

Our clients may still wish to make further formal representations in respect of the Plan and this site. In the event they do wish to, any further representations will be submitted before the end of the consultation period.

Best regards

Mark Schull
Arrow Planning Limited
e: mark@arrowplanning.co.uk
m: 07967 348 695
t: 01494 447202
www.arrowplanning.co.uk

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CA 1d

Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title		Mr
First Name		Mark
Last Name		Schmull
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>	T A Fisher, C/O Agent	Arrow Planning Limited
Address 1		28 Wingate Avenue
Address 2		
Address 3		
Town		High Wycombe
Post Code		HP13 7QP
Telephone		01494 447202
E-mail		mark@arrowplanning.co.uk

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CA1d and the Proposals Map allocation of Policy CA1d

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Policy CA1d proposes the allocation of land to the rear of 200-214 Henley Road, 12-24 All Hallows Road and 4,7 and 8 Copse Avenue for residential development. However, there are a number of errors and inaccuracies in the Policy which need to be amended to make the Plan sound.

As currently drafted the Plan is unsound as this Policy is not Positively Prepared or Justified for the following reasons:

1. The proposals map has a small error in respect of this allocation. The allocation boundaries of the 'southern parcel' (i.e. the land rear of Henley Road) should be extended until it meets Overton Drive. As currently drafted, there is a gap between the 'southern parcel' allocation boundary and Overton Drive.
2. The proposals map also shows a 'green link' through Overton Drive. However, that development has been completed. There is no space, nor ownership ability, to deliver the green link through Overton Drive to All Hallows Road. This in turn renders the green link through the 'northern parcel' of the allocation pointless, as it would not be capable of connecting beyond site frontage to Overton Drive. Furthermore, the link extends westwards across school playing fields. These are in active use and would not provide a suitable green link, as the use would disturb any ecological potential. This section of the green link is thus not practical, not justified, deliverable or based on any evidence and should be removed. The section from Overton Drive to the western boundary of Micklands Primary School should be deleted from the proposals map.
3. As a result of the deletion of this part of the green link from the proposals map, the accompanying wording in Policy CA1d should also be removed. This wording requires a green link along the eastern boundary of the site

adjoining the gardens on Copse Avenue. The removal of this wording is further justified as the green link could not be retained in perpetuity. Whilst a developer could deliver the link, this would likely fall in the back gardens of the new dwellings. The new property owners could choose to amend, not maintain, severe, or remove the elements of the link in their private gardens. Therefore the requirement should be removed.

4. The Policy requires that the entire allocation "address air quality impacts on residential use". However, only the 'southern parcel' (rear of Henley Road) falls within an Air Quality Management Area (AQMA). The 'northern parcel' (rear of All Hallows Road) is outside of that AQMA and therefore should not be required to address air quality impacts.
5. Accompanying these representations is an illustrative Masterplan (Dwg. No 15303-001 Rev A) which shows that the site could potentially deliver 25 dwellings. Alternative layouts may allow for the delivery of a slightly higher number, and therefore the wording of the Policy should reflect this.
6. The site is not in an identified archaeological area; it is not within a Conservation Area; and it does not contain any listed buildings. No evidence has been presented which justifies why the site should specifically be required to take account of potential archaeological significance. Similarly, there is no history of contamination or likely risk of contamination in this location. Therefore, these requirements are not justified and should be removed.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

The following modifications would make the Plan Sound:

1. Amendment to the Proposals Map to extend the 'southern parcel' of the CA1d allocation so that it reaches Overton Drive.
2. Removal of the green link from the junction of Overton Drive and All Hallows Road, to the western boundary of Micklands Primary School.
3. Amendments to the text in Policy CA1d so that it reads as follows:

CA1d REAR OF 200-214 HENLEY ROAD, 12-24 ALL HALLOWS ROAD & 4, 7 & 8 COPSE AVENUE

Development for residential.

Development should:

- Be accessed from Overton Drive;
- Be designed to retain important trees and groups of trees, and avoid adverse effects on important trees including that protected by TPO;
- Avoid a net loss of biodiversity, and provide for a net gain where possible;
- ~~Provide for a green link along the eastern boundary of the site adjoining the gardens of Copse Avenue;~~

- ~~Take account of potential archaeological significance;~~
 - The southern parcel, comprising the land to the rear of 200-214 Henley Road, will be required to address air quality impacts on residential use;
 - ~~Address any contamination on site;~~ and
 - Ensure appropriate back-to-back separation from existing residential.
- Site size: 0.87 ha at least 17-25 dwellings

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

Our client reserves the right to appear at the Examination in the event that these changes are not proposed as modifications when the Plan is submitted.

B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

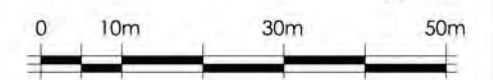
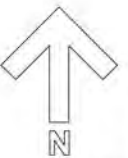
Please keep me informed of all planning policy matters:



LEGEND:

- Site Boundary
- Site Area 'A' 0.46 Ha
- Site Area 'B' 0.38 Ha
- Vehicular Routes
- Pedestrian Routes/Services
- Public transport
- Area of identified biodiversity interest
- Green Link
- Semi Private Space/Parking
- Residential Development
- Private Amenity Space

Approximate Land Budget
 Plot A = 14 UNITS
 Plot B = 11 UNITS



SUBJECT TO SITE SURVEY, CONFIRMATION OF LEGAL BOUNDARIES, SITE CONSTRAINTS, PLANNING AND HIGHWAYS APPROVAL

THIS IS BASED ON A PROMAP AND AS SUCH IS INDICATIVE AND SUBJECT TO A FULL SURVEY. THP ARE NOT LIABLE FOR ANY DISCREPANCIES

Rev	Date	Description	Rev By	Chk'd By
A	24.01.2018	ANNOTATION AMENDED	TVT	LB

Project Title: PROPOSED MASTERPLAN
 OVERTON DRIVE
 CAVERSHAM
 READING
 RG4 5LP

Client: TA FISHER

Status: FEASIBILITY

Scale: 1:1000 Drawing Size: A3

Date: 23.01/2018 Drawn By: LB Checked: TVT

Drawing Title: PROPOSED MASTERPLAN - SITE CA1d

Job-Dwg No: 15303-001 Rev: A

- 2 St. Johns North, Wakefield, WF1 3QA t. 01924 291800
- Carvers Warehouse, 77 Dale Street, Manchester, M1 2HG t. 0161 2388555
- The Old Rectory, 79 High Street, Newport Pagnell, MK16 8AB t. 01908 211577
- 101 London Road, Reading, RG1 5BY t. 0118 9507700
- 10 Goss Court, St Christophers Place, London, W1U 1JJ t. 0207 4091215



TAIT, SUSAN

From: Sue Tait
Sent: 23 January 2018 20:13
To: Planning Policy
Subject: Fwd: Protect Mapledurham Playing Fields

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

----- Forwarded message ----- From:

Sue Tait

Date: 23 January 2018 at 20:02

Subject: Protect Mapledurham Playing

Fields To: policy@reading.gov.uk

With reference to the draft Local Plan Section EN7N Item EN7Nn, I would like to ask the following questions:

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?

2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?

3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
 - a. Traffic movements
 - b. Air pollution
 - c. Noise pollution
 - d. Visual dominance and overbearing on the area of the site where they propose to build
 - e. Privacy and overlooking
 - f. Out of character with local residential properties
 - g. Light pollution
 - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
 - i. Hours of operation
 - j. Reduction to the quality of the environment

4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Best regards

Mrs Susan Tait

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TARMAC



Planning Policy Team
Directorate of Environment and Neighbourhood Services
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

26th January 2018

Ref: TAR003/dak

Dear Sir

READING BOROUGH LOCAL PLAN: Consultation on Pre- Submission Draft Local Plan

This representation is made by David Lock Associates (DLA) on behalf of Tarmac.

Tarmac Land Ownership:

Tarmac own land in the South Reading area - the landholdings are marked on the attached plan. Some of the company's ownership also lies within the administrative area of the adjoining West Berkshire District.

Proposed Designations:

None of the Tarmac land is currently proposed for built development in the emerging Local Plans of Reading or West Berkshire. The Proposals Map shows the landholdings in Reading to be the subject of several environmental designations including Area of Archaeological Potential, Area of Identified Biodiversity Interest and a Major Landscape Feature. The Area Strategy for South Reading shows the sites as green space.

Policy SR5: Leisure and Recreation Use of the Kennetside Areas

Tarmac support the provisions of Policy SR5 to promote sites for low-intensity leisure and recreation use.

Major Growth Proposals:

However, the growth proposed in South Reading, together with adjacent areas of West Berkshire and Wokingham District is of a very significant scale. The non-statutory **West of Berkshire Spatial Planning Framework** provides the best current indication of the scale and location of this potential growth on the boundaries of Reading. Major development is suggested at both Grazeley/Mortimer with 10000 units in Wokingham and a further 5000 in West Berkshire. In South Reading, within the Borough boundary, major new employment



development is planned at the Island Road Major Opportunity Area together with other major redevelopment opportunities at Manor Farm Road and South of Elgar Road.

Strategic Infrastructure Requirements:

This scale of potential growth will require supporting green infrastructure and surface water drainage infrastructure that is off-site and may impact/require the land in Tarmac ownership and other similar sites. The requirement for sites to perform these functions to facilitate and release major development is not in any way recognised or addressed. There should be a specific and clear reference to the infrastructure that may be needed in those areas which now have only environmental designations. In the future new flood alleviation methodologies may be devised that will render the sites suitable for built development. Tarmac wish to confirm that their landholdings are available for development in that context.

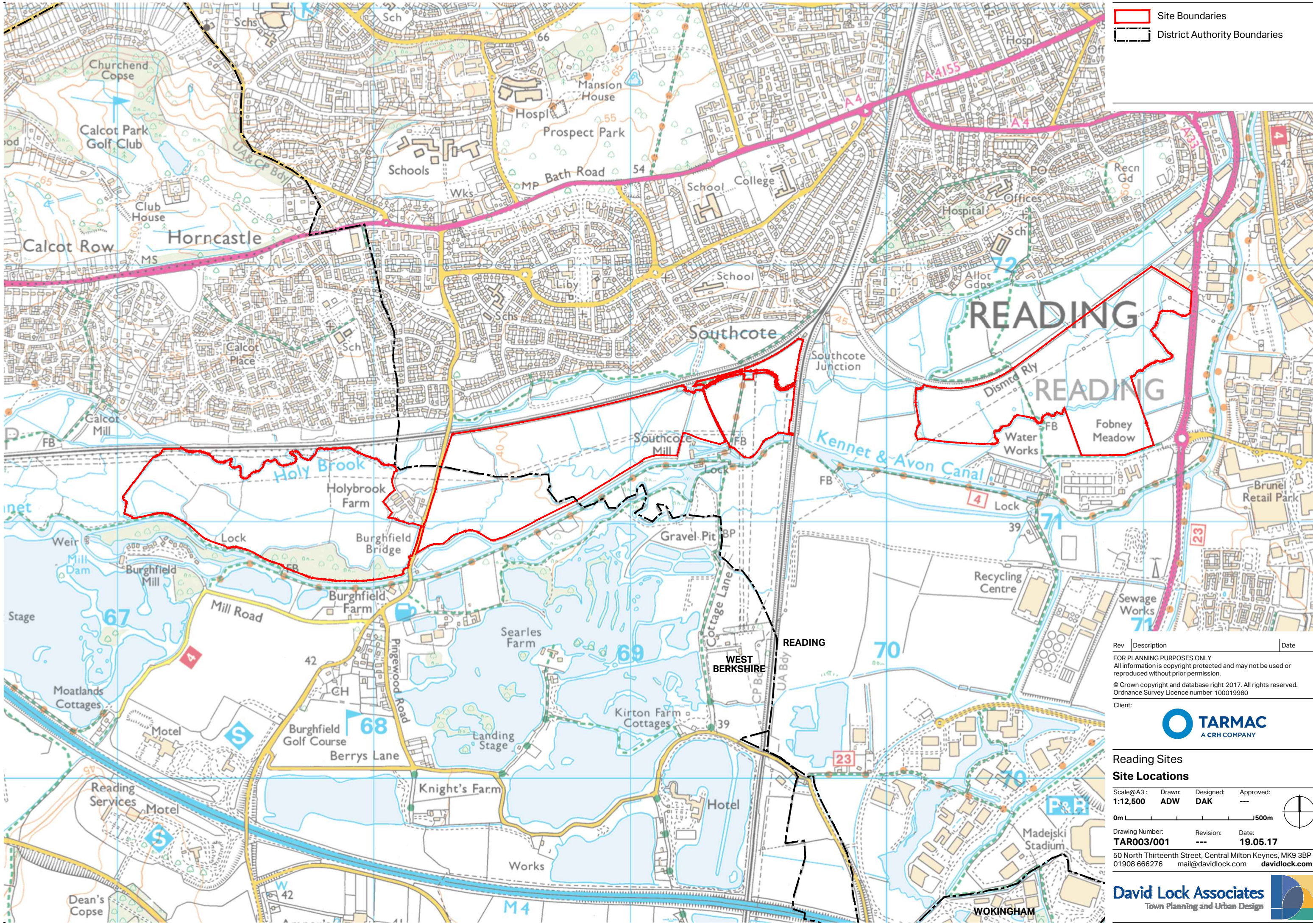
Please do not hesitate to contact me to discuss or if you require more information.

Yours sincerely

DAVID KEENE
Partner

e-mail: dkeene@davidlock.com

enc Plan showing Tarmac Land Ownership



Site Boundaries
 District Authority Boundaries

Rev	Description	Date
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© Crown copyright and database right 2017. All rights reserved. Ordnance Survey Licence number 100019980		
Client:		



Reading Sites
Site Locations

Scale@A3: 1:12,500	Drawn: ADW	Designed: DAK	Approved: ---
0m 1500m			
Drawing Number: TAR003/001	Revision: ---	Date: 19.05.17	
50 North Thirteenth Street, Central Milton Keynes, MK9 3BP 01908 666276 mail@davidlock.com davidlock.com			



TEER, SIGI

From: sigi.teer
Sent: 23 January 2018 13:02
To: Planning Policy
Subject: RBC's Pre-Submission Local Plan November 2017 /Reading Golf Club /Emmer Green /Caversham area

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

Dear Sir/Madam,

I am writing with regard to Reading Borough Council's Pre-Submission Local Plan November 2017.

I am concerned about further development in the Caversham/Emmer Green area, particular the proposal to build 90-130 dwellings on part of Reading Golf course in Kidmore End Road.

Infrastructure:

The infrastructure in this area is not in place to take more housing.

The road infrastructure is insufficient.

At the moment it can take up to 20 minutes to get from Emmer Green to Caversham, let alone Reading. The traffic jams at the traffic lights between Peppard Road and Prospect Street are a nightmare. There often is a queue of cars from the traffic lights at the bottom of Peppard Road right up to the Esso petrol station in Buckingham Drive.

Before RBC considers further development in this area a third Thames Bridge is a MUST to alleviate the traffic problems which are already horrendous.

Part of Kidmore End is a single lane road as cars are parked in front of the terraced cottages. Furthermore it takes a long time to get onto Peppard Road from the junction with Kidmore End Road as the flow of traffic is constant.

On Saturday it took me 10 minutes to find a parking space at Waitrose car park in Caversham because there is already an overload of people and cars which Caversham obviously cannot cope with.

Surgeries

The waiting list at Emmer Green Surgery for an appointment is long and is getting worse. Again this confirms that there are already too many people in this area and the infrastructure is not there to support an expansion.

Green space

Reading Golf Course is 108 years old. A beautiful landscape which is enjoyed by golfers and walkers alike. It gives the residents an opportunity to unwind and enjoy our beautiful surroundings. Something we should be proud of and not to be destroyed by more and more housing. Spaces like these are important to peoples physical and mental wellbeing. There are hardly any beautiful green spaces left in Emmer Green. There are old mature trees and wildlife whose habitat will be destroyed and will not be able to be replaced.

There are a lot more points which can be raised as to why the continuous building in areas like Emmer Green should be stopped.

I strongly oppose a housing project at Reading Golf Course.

S. Teer

TEER, TREVOR

From: Trevor
Sent: 22 January 2018 13:14
To: Planning Policy
Subject: RBC's Pre Submission Local Plan- November 2017

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

Dear Sir/ Madam,

I am writing with regard to RBC's Pre-Submission Local Plan November 2017 and in particular regarding the development of part of Reading Golf Course in Kidmore End Road.

I would like to strongly object to any further development in Caversham and Emmer Green. Firstly the road infrastructure is not capable of taking the extra traffic that such developments would generate. The traffic jams at the traffic lights between Peppard Road and Prospect Street are a nightmare at the moment without any additional traffic. The same goes for the junction between Bridge Street and St Peters Hill.

As everyone knows a third Thames Bridge is urgently required to enable traffic to get over the Thames rather than having to go over to Sonning, which has only one carriageway, or through the centre of Reading.

A third Thames Bridge must be one of a number of pre-requisites before any further development north of the Thames can be contemplated.

Your proposal for developing Reading Golf Course particularly worries me.

RGC is 108 years old this year and to contemplate ravaging such a lovely green space and amenity is sacrilege as far as I am concerned. The golf course is also a home to many species of animals and insects and would be impossible to replace as green lung for the area.

Kidmore End is effectively, in large part, a single lane road with cars parked outside of the terraced cottages. Any extra traffic using that road would just exasperate the situation beyond acceptable limits. This would only be partially mitigated by widening the road and taking away some of the playing field!

There are many other reasons that I could enumerate which would make the proposed development beyond the pale but I will just say that such an idea will infuriate many local people in Emmer Green.

I therefore strongly oppose these proposals

Yours faithfully

Trevor Teer

THAMES PROPERTIES LTD

Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title		Miss
First Name		Katherine
Last Name		Jones
Job Title <i>(if applicable)</i>		Senior Planner
Organisation <i>(if applicable)</i>	Thames Properties Limited	Barton Willmore
Address 1	c/o Agent	The Blade
Address 2		Abbey Square
Address 3		
Town		Reading
Post Code		RG1 3BE
Telephone		0118 943 0091
E-mail		katherine.jones@bartonwillmore.co.uk

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Local Plan: Objectives 2 and 3, Spatial Strategy, Policies H1, WR3 and WR3a; and The Sustainability Appraisal

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please see enclosed representation (our reference 24325/A3/KJ/slh) and accompanying appendices A and B for full details.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please see enclosed representation (our reference 24325/A3/KJ/slh) and accompanying appendices A and B for full details.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

To present the case set out in our representations including responding to the Inspector's questions and responses submitted by other participants at the Local Plan Examination.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

Planning Policy Team,
Reading Borough Council,
Civic Offices,
Bridge Street,
Reading,
Berkshire.
RG1 2LU

BY EMAIL: planningpolicy@reading.gov.uk

24325/A3/KJ/slh

26th January, 2018

Dear Sir/Madam,

**PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN (REGULATION 19)
CONSULTATION - NOVEMBER 2017
REPRESENTATIONS SUBMITTED ON BEHALF OF THAMES PROPERTIES LIMITED RE: THE
FORMER COX AND WYMAN BUILDING, CARDIFF ROAD, READING**

We write on behalf of our client, Thames Properties Ltd., to submit representations to the Pre-Submission Draft Reading Borough Local Plan (Regulation 19) consultation (hereafter referred to as the 'Pre-Submission Draft LP') which is currently the subject of public consultation.

Thames Properties Ltd. (hereafter referred to as 'Thames Properties') control land within the Richfield Avenue Core Employment Area (CEA) as depicted on the plan at **Appendix A**, and the former Cox and Wyman site to the east of the CEA on Cardiff Road as illustrated on the plan at **Appendix B**. The representation below sets out Thames Properties' comments on the Pre-Submission Draft LP specifically in relation to their landholding at the site of the former Cox & Wyman printing press at Cardiff Road, Reading.

We have previously responded on behalf of Thames Properties to the RBC Draft Local Plan (Regulation 18) consultation in May 2017 to support the proposed removal of the former Cox & Wyman site from the Richfield Avenue CEA and the redevelopment of the site for residential use. As part of those representations, we also highlighted the potential for the Richfield Avenue CEA to accommodate alternative commercial uses beyond the 'major employment' uses envisaged in the Draft LP. Our comments on the Richfield Avenue CEA in response to the current consultation are submitted under separate cover as an additional representation on behalf of Thames Properties.

OBJECTIVES

The objectives set out in the Draft LP are considered broadly acceptable in supporting the overarching Vision:



2. Make the most efficient use of Reading's limited land, particularly previously developed land, to ensure that as many new homes as possible are delivered to meet identified needs, particularly needs for affordable housing.

It is acknowledged in the Pre-Submission Draft LP that there is limited available land within the Borough to accommodate housing to meet the identified housing need, which highlights the importance of Objective 2 in making effective and efficient use of existing land, particularly previously developed land.

The Draft LP sets out at Policy H1 that provision will be made in Reading Borough for "at least an additional 15,433 homes" (averaging 671 dwellings per annum (dpa)). The Berkshire SHMA (2016) identifies an Objectively Assessed Housing Need (OAHN) of 699 dpa between 2013 and 2036. Taking this housing requirement into account, Policy H1 acknowledges that there will be a housing shortfall of 644 dwellings in the Borough over the Local Plan period and proposes that this unmet need is accommodated by neighbouring authorities within the Western Berkshire Housing Market Area (HMA).

There is no guarantee of the unmet need being met within the HMA and no commitment in the Local Plan for neighbouring Authorities to accommodate this need – Policy H1 simply states that "The Council will continue to work with neighbouring authorities...to ensure that the shortfall will be met over the plan period." The need to make efficient use of available, previously developed land is clearly of great importance.

Thames Properties is therefore supportive of Objective 2 but suggests that RBC should seek to make more effective use of brownfield sites to contribute towards meeting its housing need rather than rely on the ability of neighbouring authorities to accommodate its unmet need.

3. Improve the quality of life for those living, working, studying in and visiting the Borough, creating inclusive, sustainable communities with good access to employment, open space and waterspace, transport, education, services and facilities (such as sustainable water supplies and wastewater treatment, healthcare services, social and community facilities, sport and recreation, etc.) to meet identified needs.

Thames Properties is supportive of the need to create sustainable communities with good access to employment and open space for those living in the Borough. The proposed allocation of sustainably located, previously developed sites for residential use in the Local Plan such as site reference WR3a (former Cox & Wyman site) fully supports the aims of this objective.

The proposed allocation of sites WR3a, WR3b and WR3c for residential development is a clear indication that there are sustainably located, previously developed sites in the Borough that could be put to better use to meet Objectives 2 and 3. In particular, this demonstrates that the Council recognises that parts of the Richfield Avenue CEA are better suited to residential development than employment use, and the employment designation is perhaps outdated.

SPATIAL STRATEGY

Within the overall Spatial Strategy for the Borough, the Pre-Submission Draft LP sets out the strategy for existing employment areas and recognises that a high level of need has been identified for new floorspace for employment development (paragraph 3.2.10). The Plan does, however, recognise the tension between maximizing the efficiency of existing employment areas to fulfil this role and identifying existing employment areas that are failing to meet the demand.

Thames Properties agree that a balance must be struck between the retention of existing, suitable employment land for that use to meet the demand for employment floorspace, and the redevelopment of employment land that may no longer be suitable for purpose and could be used more efficiently to help meet the Borough's demand for housing.

In relation to that balance, Draft LP Paragraph 3.2.10 notes that:

'...as an exception, there are some specific areas where there is some potential for residential use, in particular where the current uses are not 'pure' employment uses, where there is a difficult relationship with residential land that could be better addressed through development, or where there is little prospect of employment use in the long term. Areas around Manor Farm Road...and at the eastern edge of the Richfield Avenue area are the main opportunities.'

Thames Properties welcome the flexibility within the Plan for the release of some employment land for residential use and the identification of the eastern edge of the Richfield Avenue CEA as a suitable location for housing. This is reflected in the allocation of the former Cox & Wyman site for residential development under draft Policy WR3a.

POLICY H1: PROVISION OF HOUSING

Policy H1 sets out that provision will be made within Reading Borough for at least an additional 15,433 homes (averaging 671 homes per annum) for the period 2013 to 2036. Having regard to the OAHN identified in the Berkshire SHMA (2016) of 699 dpa, it is clear that RBC is failing to meet its housing need by a shortfall of 644 dwellings over the Plan period, including a significant shortfall in affordable housing within the Borough.

As set out above, Policy H1 relies on Reading's unmet need being met by neighbouring authorities in the HMA but there is no commitment to this by other Authorities within the HMA.

Having regard to the need to accommodate additional housing and make best use of Reading's limited land, Thames Properties is supportive of the Council's approach to reconsider sites currently within employment designations that are no longer fulfilling their role and may be better utilised to provide residential development, as is the case with the proposed allocation of site WR3a. Thames Properties suggests that RBC considers whether additional sites within the existing employment areas, beyond those sites already identified, could be used more efficiently to accommodate housing.

Given the pressing need for new housing in Reading and the limited availability of sites for redevelopment within the Borough boundary, this would seem entirely appropriate, and indeed consistent with national guidance, which advises local planning authorities to recognise the diverse types of housing needed in their area and, where appropriate, identify specific sites for all types of housing to meet their anticipated housing requirement.

POLICY WR3: OTHER SITES FOR DEVELOPMENT IN WEST READING AND TILEHURST

The eastern edge of the Richfield CEA is covered by proposed Draft LP Policies WR3a (Former Cox & Wyman site), WR3b (2 Ross Road and Part of Meadow Road) and WR3c (28-30 Richfield Avenue) which fall within the overarching WR3 'Other Sites for Development in West Reading and Tilehurst' Policy.

The proposed release of the eastern edge of the Richfield CEA for redevelopment away from employment use suggests that RBC recognises that the pure CEA designation for Richfield Avenue is outdated and that more flexibility should be introduced to allow for a range of uses in this location. Thames Properties is supportive of this approach and in particular, Policy WR3a for the proposed redevelopment of the former Cox & Wyman site on Cardiff Road.

Policy WR3a: Former Cox & Wyman Site, Cardiff Road

The former Cox and Wyman building constitutes an island site bordered by Cardiff Road, Addison Road, Meadow Road and Milford Road. To the south and east of the site lies an area of existing

housing which comprises high density Victorian terraced streets with on road parking. To the north-west and west is the remainder of the Richfield Avenue CEA.

The building has been expanded over the years on a bespoke basis specifically to accommodate the Cox & Wyman book printing works and is now unsuitable in terms of its layout and design for most modern industrial operations. Cox and Wyman vacated the building in April 2015 and it has since been let at an almost nil rent basis, however there has been no significant interest to occupy the unit long term on normal market terms.

The site is therefore not fulfilling its employment designation and is an entirely logical location for housing. Thames Properties is therefore supportive of Policy WR3a to remove the former Cox and Wyman site from the Richfield Avenue CEA and redevelop for residential use to contribute towards meeting the Borough's identified housing need.

Policy WR3a states that the site will comprise '*Development for residential, with potential for commercial uses on the western edge of the site*'. This implies that RBC's priority for the site is redevelopment for residential use, but the '*potential*' for commercial use suggests that this will not be required by policy but would be considered by RBC if demonstrated to be appropriate.

Thames Properties have undertaken a comprehensive masterplanning exercise to determine how to make the best and most efficient use of the site having regard to the criteria of draft Policy WR3a. This process, which has included extensive pre-application engagement with RBC's Officers, has culminated in the preparation and submission of a planning application for a high-quality residential development comprising 96 dwellings and areas of public open space.

Given the island nature of the site, Thames Properties consider that the site is well suited to a solely residential scheme comprising a mixture of houses and apartments and carefully designed landscaping and open space. It is not considered that the inclusion of commercial uses on the western edge of the site will enhance the overall scheme or assist in improving the transition between residential uses and the adjacent CEA to benefit future residents (as sought by the Spatial Strategy).

The Plan envisages that the site could be delivered within the short-medium term of the RBC Local Plan period, i.e. 2016-2026. Thames Properties is supportive of this approach.

SUSTAINABILITY APPRAISAL (NOVEMBER 2017)

The RBC Sustainability Appraisal (SA) (November 2017) assesses Policy WR3a: Former Cox and Wyman site as having a very positive impact on sustainability objectives 4 (minimising the consumption of, and reducing the damage to, undeveloped land); 13 (ensuring high quality housing of a type and cost appropriate to the area's needs); and 14 (reducing the need for travel and transport particularly by car, and facilitating sustainable travel choices).

Thames Properties support the conclusion drawn in The SA that option ii) to redevelop the site for residential use is the most preferable option having regard to the number of positive effects when compared to either retaining the site in its current form and use, redeveloping the site for employment use, or redeveloping the site for retail and leisure use.

More generally however, we are concerned that the SA fails to sufficiently assess the element of Policy WR3a which allows for commercial uses on the western edge of the site. The conclusions drawn in the SA do not support this inclusion in the Policy; they support the re-use of the site for residential use.

The inclusion of commercial uses within the site has the potential to have a negative, or tendency to a negative, impact on SA Objectives 5, 6 and 12, but these are not assessed within the SA. There is no clear justification or support, therefore, for the conclusion in Draft Local Plan Policy WR3a that the site has the potential for commercial uses.

DUTY TO COOPERATE

The NPPF outlines (paragraph 159) that in planning for housing, Councils must work with neighbouring authorities to prepare a SHMA for the housing market area and must also cooperate to ensure the needs of the housing market are met. The "Duty to Cooperate" is both a legal requirement, based on the 2011 Localism Act, and a soundness test for plan-making. We are pleased to see that Reading Borough Council has acknowledged its 'Duty to Cooperate' with neighbouring Local Planning Authorities in the Western Berkshire Housing Market Area to accommodate its unmet housing need, as outlined in Policy H1, but as set out above we have concerns with whether this can be achieved.

Policy H1 is vague in terms of which neighbouring authorities within the HMA could accommodate the unmet need and simply states that "*The Council will continue to work with neighbouring authorities*" to ensure that the shortfall is met. The Local Plan could be stronger in terms of the Council's commitment to working with neighbouring authorities to ensure that its objectively assessed housing needs are met, as well as in relation to cross-boundary matters such as strategic infrastructure and employment provision.

CONCLUSION

As set out within this representation, not all of the designated CEAs within Reading Borough are necessarily fulfilling the purpose that they were originally intended to serve with respect to employment provision. The Richfield Avenue CEA is one such example, and this is reflected in RBC's proposal within the Draft LP to remove the eastern edge of that CEA and allocate for residential development. Thames Properties is entirely supportive of this approach, particularly in relation to the allocation of the former Cox and Wyman building for residential development as set out under Policy WR3a, subject to the removal of any requirement to provide a commercial use on this site.

Nevertheless, Thames Properties would urge the Council to focus the attention of Policy WR3a solely on residential development having regard to the need to make efficient use of previously developed land to meet the Borough's housing need.

Thames Properties' representations to the Pre-Submission Draft LP in response to the Richfield Avenue CEA designation are submitted under separate cover.

We trust that the above representations are helpful to you and await confirmation of their receipt. In the meantime, should the Council have any queries or require any further clarification on any aspect of the above, please do not hesitate to contact the writer.

Yours faithfully,



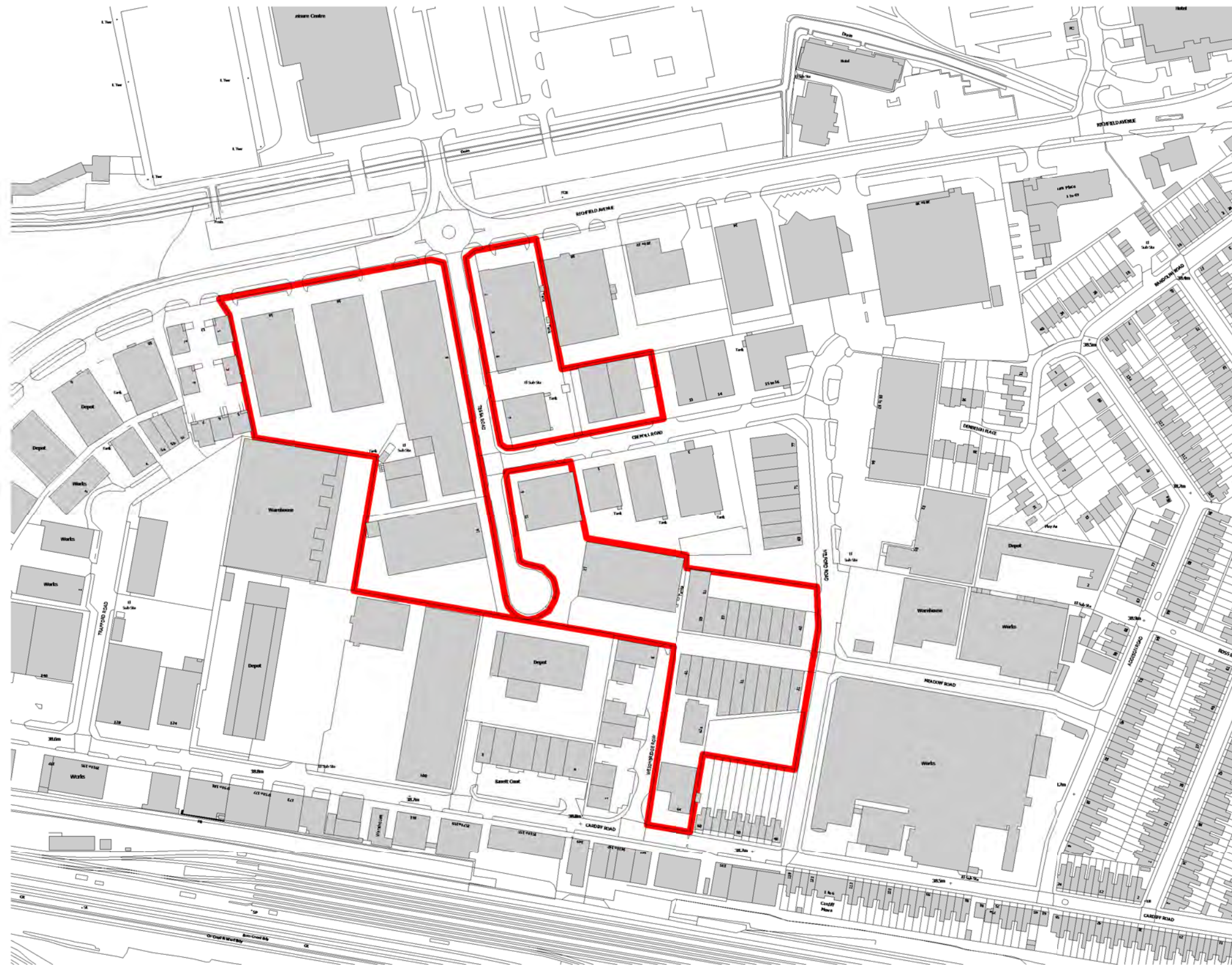
KATHERINE JONES

Senior Planner

Encs.

cc: C. Merry, Esq. - Thames Properties Ltd.
S. Fruchter, Esq. - Thames Properties Ltd.

Appendix A – Plan of Thames Properties' Ownership within the Richfield Avenue CEA
Appendix B – Plan of Thames Properties' Ownership of the Cox & Wyman Site



— Site Boundary
 3.79 Ha

Project
**Richfield Avenue
 Reading**
 Drawing Title
Site Location Plan

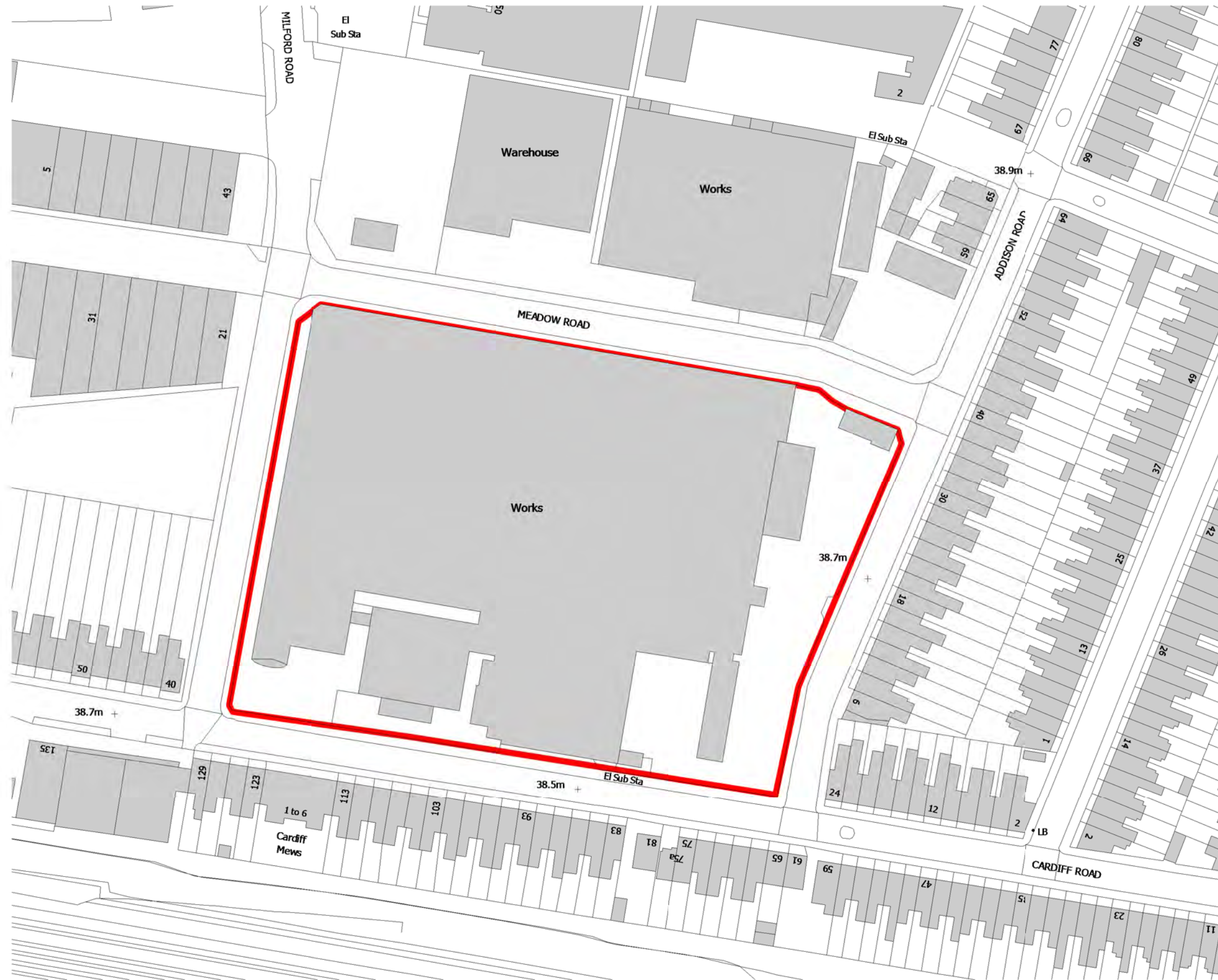
Date	Scale	Drawn by	Check by
02/27/15	1 : 2500 @ A3	TM	TM
Project No	Drawing No	Revision	
24325	PL-100		

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 Architecture • Landscape Planning & Design • Project Services
 Environmental & Sustainability Assessment • Graphic Design

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Reading London Bristol Cambridge Cardiff Ebbwfleet Edinburgh Leeds Manchester Solihull Newcastle



— Site Boundary
 1.31 Ha

Project
Richfield Avenue
Reading
 Drawing Title
Location Plan
Cardiff Road

Date	Scale	Drawn by	Check by
10/14/15	1 : 1000 @ A3	TM	TM
Project No	Drawing No	Revision	
24325	PL-101		

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 Environmental & Sustainability Assessment • Graphic Design

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Reading London Bristol Cambridge Cardiff Ebbfleet Edinburgh Leeds Manchester Solihull Newcastle

Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title		Miss
First Name		Katherine
Last Name		Jones
Job Title <i>(if applicable)</i>		Senior Planner
Organisation <i>(if applicable)</i>	Thames Properties Limited	Barton Willmore
Address 1	c/o Agent	The Blade
Address 2		Abbey Square
Address 3		
Town		Reading
Post Code		RG1 3BE
Telephone		0118 943 0091
E-mail		katherine.jones@bartonwillmore.co.uk

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Local Plan: Objectives 2 and 3, Spatial Strategy, Policies EM2, EM3, EM4, H1 and WR4; and The Sustainability Appraisal

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please see enclosed representation (our reference 28519/A3/KJ/slh) and accompanying appendices A and B for full details.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please see enclosed representation (our reference 28519/A3/KJ/slh) and accompanying appendices A and B for full details.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

To present the case set out in our representations including responding to the Inspector's questions and responses submitted by other participants at the Local Plan Examination.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

Planning Policy Team,
Reading Borough Council,
Civic Offices,
Bridge Street,
Reading,
Berkshire.
RG1 2LU

BY EMAIL: planningpolicy@reading.gov.uk

28519/A3/KJ/slh

26th January, 2018

Dear Sir/Madam,

**PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN (REGULATION 19)
CONSULTATION - NOVEMBER 2017
REPRESENTATIONS SUBMITTED ON BEHALF OF THAMES PROPERTIES LIMITED RE:
RICHFIELD AVENUE CORE EMPLOYMENT AREA, READING**

We write on behalf of our client, Thames Properties Ltd., to submit representations to the Pre-Submission Draft Reading Borough Local Plan (Regulation 19) consultation (hereafter referred to as the 'Pre-Submission Draft LP') which is currently the subject of public consultation.

Thames Properties Ltd. (hereafter referred to as 'Thames Properties') control land within the Richfield Avenue Core Employment Area (CEA) as depicted on the plan at **Appendix A**. The representation below sets out Thames Properties' comments on the Pre-Submission Draft LP in relation to the Richfield Avenue CEA and comments on the proposed allocation of land at Cow Lane, Reading, for Gypsy and Traveller pitch provision given its proximity to the CEA. A separate representation is submitted with regard to Thames Properties' landholding at the site of the former Cox & Wyman printing press at Cardiff Road, Reading, which is proposed for removal from the CEA in the emerging Local Plan.

We have previously responded on behalf of Thames Properties to the RBC Draft Local Plan (Regulation 18) consultation in May 2017. The representation to the current consultation, set out below, is further supported by an up to date assessment of Market Demand Analysis in the Richfield Avenue CEA, undertaken by Campbell Gordon (January 2018) and enclosed at **Appendix B**.

OBJECTIVES

The objectives set out in the Draft LP are considered broadly acceptable in supporting the overarching Vision:

2. Make the most efficient use of Reading's limited land, particularly previously developed land, to ensure that as many new homes as possible are delivered to meet identified needs, particularly needs for affordable housing.



It is acknowledged in the Pre-Submission Draft LP that there is limited available land within the Borough to accommodate housing to meet the identified housing need, which highlights the importance of Objective 2 in making effective and efficient use of existing land, particularly previously developed land.

The Draft LP sets out at Policy H1 that provision will be made in Reading Borough for "at least an additional 15,433 homes" (averaging 671 dwellings per annum (dpa)). The Berkshire SHMA (2016) identifies an Objectively Assessed Housing Need (OAHN) of 699 dpa between 2013 and 2036. Taking this housing requirement into account, Policy H1 acknowledges that there will be a housing shortfall of 644 dwellings in the Borough over the Local Plan period and proposes that this unmet need is accommodated by neighbouring authorities within the Western Berkshire Housing Market Area (HMA).

There is no guarantee of the unmet need being met within the HMA and no commitment in the Local Plan for neighbouring Authorities to accommodate this need – Policy H1 simply states that "The Council will continue to work with neighbouring authorities...to ensure that the shortfall will be met over the plan period." The need to make efficient use of available, previously developed land is clearly of great importance.

Thames Properties is therefore supportive of Objective 2 but suggests that RBC should seek to make more effective use of brownfield sites to contribute towards meeting its housing need rather than rely on the ability of neighbouring authorities to accommodate its unmet need. As set out later in this representation, the Richfield Avenue CEA has the potential to accommodate an element of housing (in addition to the sites identified for release from the CEA for residential development under Policies WR3a-c) to contribute to Objective 2 without undermining the overarching employment designation.

3. Improve the quality of life for those living, working, studying in and visiting the Borough, creating inclusive, sustainable communities with good access to employment, open space and waterspace, transport, education, services and facilities (such as sustainable water supplies and wastewater treatment, healthcare services, social and community facilities, sport and recreation, etc.) to meet identified needs.

Thames Properties is supportive of the need to create sustainable communities with good access to employment and open space for those living in the Borough. The proposed release of land at the eastern edge of the CEA for residential development (draft Policies WR3a-c) is entirely logical given its proximity to employment opportunities in the town centre and areas of open space at nearby Christchurch Meadows adjacent to the River Thames.

The proposed allocation of sites WR3a-c is a clear indication that the Council recognises that parts of the Richfield Avenue CEA are better suited to residential development than employment use, and that the employment designation is perhaps outdated. Richfield Avenue is well located for accessing Reading town centre and the facilities that it offers and serves as an excellent location for people to both live and work.

The allocation of sites WR3a-c therefore makes a good contribution towards Objective 3, but Thames Properties consider that the Local Plan could go further in allowing for greater flexibility of uses in the Richfield Avenue CEA beyond the traditional employment uses. For example, a mixed-use development which includes non-traditional employment uses that complement - and are ancillary to - the main employment function would enhance the attractiveness of the site to future occupiers and make better use of the site's excellent position close to the town centre to support the aims of Objective 3.

SPATIAL STRATEGY

Within the overall Spatial Strategy for the Borough, the Pre-Submission Draft LP sets out the strategy for existing employment areas and recognises that a high level of need has been identified for new floorspace for employment development (paragraph 3.2.10). The Plan does, however, recognise the tension between maximizing the efficiency of existing employment areas to fulfil this role and identifying existing employment areas that are failing to meet the demand.

Thames Properties agree that a balance must be struck between the retention of existing, suitable employment land for that use to meet the demand for employment floorspace, and the redevelopment of employment land that may no longer be suitable for purpose and could be used more efficiently to help meet the Borough's demand for housing.

In relation to that balance, Paragraph 3.2.10 notes that:

'...as an exception, there are some specific areas where there is some potential for residential use, in particular where the current uses are not 'pure' employment uses, where there is a difficult relationship with residential land that could be better addressed through development, or where there is little prospect of employment use in the long term. Areas around Manor Farm Road...and at the eastern edge of the Richfield Avenue area are the main opportunities.'

Thames Properties welcome the flexibility within the Plan for the release of some employment land for residential use and the identification of the eastern edge of the Richfield Avenue CEA as a suitable location for housing. The release of the eastern edge of the Richfield Avenue CEA is logical given its proximity to residential development on Addison Road and Cardiff Road. However, the same could be said for land to the south of the Richfield CEA immediately opposite existing dwellings on Cardiff Road, but no explanation is provided to justify why this land is retained in the CEA.

Paragraph 3.2.10 implies that 'pure employment' uses will continue in CEAs; the definition of 'pure employment' is not provided, but related Policy EM2 suggests that this is intended to be industrial, storage and distribution uses.

As set out further in relation to Policies EM2 and EM3, below, Thames Properties suggest that the Plan should allow for greater flexibility within the Richfield Avenue CEA to provide more mixed commercial uses.

Thames Properties support the Spatial Strategy's approach to redeveloping some designated employment areas for residential use where they no longer fulfil their role, in particular the Richfield Avenue CEA, but would welcome further consideration of the remainder of that CEA in terms of its ability to fulfil a 'pure' employment role and whether the area could be enhanced by incorporating additional commercial uses

POLICY EM2: LOCATION OF EMPLOYMENT DEVELOPMENT

Policy EM2 seeks to direct major employment uses to the A33 Corridor and the Core Employment Areas. The policy does not define 'major employment uses' and further clarity would be welcomed in this regard, but does note that the policy includes industrial and storage and distribution uses.

The designation of the land at Richfield Avenue as a CEA is confirmed by Policy EM2 and the corresponding Proposals Map (site reference EM2g). As noted above, Thames Properties welcome the reduced size of the allocation for Richfield Avenue CEA and the proposed release of land on the eastern edge of the CEA for housing. We would, however, urge RBC to consider the suitability of the Richfield Avenue CEA for continued provision of 'major employment' uses, as originally intended under the CEA designation.

It is clear why major employment uses should be directed towards areas around the A33 corridor under Policy EM2 given the ease of access to these sites, but in the instances where CEAs are in less accessible locations (as is the case with the Richfield Avenue CEA) there should be flexibility in the Local Plan to ensure that the uses in the CEA are not restricted to only the pure 'traditional' employment uses, but instead there is scope to introduce additional commercial uses that are ancillary to – and complement – the overall employment designation.

Richfield Avenue Core Employment Area

Within RBC's Local Plan Issues and Options (LPIO) document (January 2016), the Council acknowledged that the Richfield Avenue CEA has aged over time and increasingly become a location for other commercial uses that are non-traditional employment uses, such as a casino, car dealerships and a bar (paragraph 4.27 of LPIO document). Appendix 6 to the LPIO acknowledged that vacancy levels in the CEA were reasonably high, and that Richfield Avenue itself is characterised by a greater mix of uses than the 'traditional' employment uses around Cardiff Road, Milford Road and Trafford Road.

In seeking to understand the viability of Richfield Avenue as a CEA, Thames Properties has commissioned Campbell Gordon to undertake a Market Demand Analysis of the area (**Appendix B**). The Analysis concludes that the CEA is poorly located for modern industrial occupiers - which is reflected in the lack of demand for the larger industrial units - and lacks amenity provision to attract potential occupiers.

The market has clearly changed since the CEA was first constructed and industrial occupiers have a greater demand for high-quality space with modern specification, which is a stark contrast to the existing accommodation in the Richfield Avenue CEA. Even if the outdated accommodation were to be demolished and replaced with modern specification space, Thames Properties is concerned that the units may struggle to let in comparison to those in better locations that are near to major road junctions, often with motorway access.

Policy EM2 is therefore correct to direct major employment uses to the A33 corridor but RBC should review the appropriateness of the CEAs listed in the Policy to accommodate only the traditional 'pure' employment uses and allow for flexibility in the Richfield Avenue CEA to accommodate alternative commercial uses that are ancillary to the overarching employment designation.

POLICY EM3: LOSS OF EMPLOYMENT LAND

Policy EM3 seeks to ensure that the overall level of employment land in the CEAs is maintained. Setting aside whether or not Richfield Avenue still warrants the CEA designation, the policy is ambiguous in requiring the level of 'employment land' to be maintained, and whether this applies to floorspace or the total area of the CEA.

Thames Properties supports the inclusion in the policy for 'exceptional circumstances' which allow the Council to consider alternative commercial uses where there is no long-term prospect of employment use, but raises concern with the requirement for these uses to 'employ a similar number of people' and the need to demonstrate over five years of little to no employment prospect in order to demonstrate exceptional circumstances exist.

The subtext to the policy at paragraph 4.3.13 is more flexible and recognises that it is often preferable for a site within a CEA to be used for an alternative commercial use that complements the area than for it be vacant in the long term and does not require a certain number of people to be employed in that alternative use. Thames Properties would like to see greater flexibility within the wording of Policy EM3 to reflect the subtext in the Local Plan. We would suggest the proposed amendment to the second paragraph of Policy EM3 as follows:

Where, in exceptional circumstances, it can be demonstrated that a site in a Core Employment Area has no long-term (i.e. ~~over five years~~) prospect of 'pure' employment use, an related alternative employment commercial use or one that is ancillary to the main employment use of the site may be considered.

The suggested wording allows for non-traditional employment uses and amenity provision that could complement the existing employment uses and make the area more attractive to potential occupiers. Such an approach is considered entirely reflective of the current market demand for employment uses in Reading and the locational preferences of future occupiers and recognises that the nature of

Richfield Avenue as a CEA is changing. The introduction of such non-traditional employment uses in this location would serve to enhance the vitality and viability of the CEA as a destination for those visiting, living and working in the Borough, which supports Local Plan Objective 3.

At present, there are no services or amenities within the CEA for the occupiers. RBC should therefore consider a more adaptable policy, which enables the provision of additional non-employment uses that are ancillary to the main employment focus and would support existing occupiers within the CEA while providing greater incentive for other occupiers to locate there.

POLICY EM4: MAINTAINING A VARIETY OF PREMISES

Thames Properties agree with the need to ensure a 'variety' of premises and the flexibility built into draft Policy EM4 to allow for proposals for the redevelopment of older industrial units into more flexible employment uses.

It is unclear whether this policy relates to industrial units within all existing employment areas including the CEAs, and clarification is sought in this regard. The Richfield Avenue CEA is designated as such under Policy EM2 but contains older industrial units where demand for existing space is often low and it has proven difficult to secure occupiers. The ability to incorporate a variety of more flexible employment uses with greater demand would contribute to improving the overall vitality and viability of the Richfield Avenue CEA.

Thames Properties envisages that the Richfield Avenue CEA could be more effectively utilised – subject to flexibility in the wording of Policy EM3 – to incorporate more non-traditional employment uses to serve and sustain the wider CEA. Such uses would be ancillary to the main employment provision within the site and could include uses such as convenience retail provision, food and drink outlets, leisure facilities such as a gym and B1 office space. There may also be scope in the CEA to include a small amount of residential accommodation to contribute to meeting Local Plan Objective 3.

The market analysis undertaken by Campbell Gordon (**Appendix B**) confirms that the need for commercial occupiers to have nearby amenity has become a key feature of the market and out of town locations are now diversifying their offer of ancillary amenity provision to compete. Green Park is one such example of an out-of-town employment location where the provision of ancillary services to complement the wider employment provision has been extremely successful.

POLICY H1: PROVISION OF HOUSING

Policy H1 sets out that provision will be made within Reading Borough for at least an additional 15,433 homes (averaging 671 homes per annum) for the period 2013 to 2036. Having regard to the OAHN identified in the Berkshire SHMA (2016) of 699 dpa, it is clear that RBC is failing to meet its housing need by a shortfall of 644 dwellings over the Plan period, including a significant shortfall in affordable housing within the Borough.

As set out above, Policy H1 relies on Reading's unmet need being met by neighbouring authorities in the HMA but there is no commitment to this by other Authorities within the HMA.

Having regard to the need to accommodate additional housing and make best use of Reading's limited land, Thames Properties is supportive of the Council's approach to reconsider sites currently within employment designations that are no longer fulfilling their role and may be better utilised to provide residential development. Thames Properties suggests that RBC considers whether additional sites within the existing employment areas, beyond those sites already identified, could be used more efficiently to accommodate housing.

Given the pressing need for new housing in Reading and the limited availability of sites for redevelopment within the Borough boundary, this would seem entirely appropriate, and indeed consistent with national guidance, which advises local planning authorities to recognise the diverse

types of housing needed in their area and, where appropriate, identify specific sites for all types of housing to meet their anticipated housing requirement.

POLICY WR4: POTENTIAL TRAVELLER SITE AT COW LANE

It is understood that the proposed allocation of site WR4 at Cow Lane has arisen from the updated GTAA - which identified a need for 10-17 permanent pitches and a transit site of 5 pitches – and the Council's conclusion that it is the only site in the Borough within the Council's ownership that has some potential to accommodate the transit site requirement.

The subtext to Policy WR4 notes that there are existing commercial operations that could be affected by the allocation of the site for transit pitches and more detailed consideration of the site's potential is required (paragraphs 7.3.20-21). If this is the case, the site should not be proposed for allocation in the emerging Local Plan without the evidence to support that it is suitable and available, and will not have a detrimental impact on existing commercial uses.

Policy H13 (provision for gypsies and travellers) sets out at criteria vi) that proposals for new sites for gypsies and travellers should "Be located in line with national and local policy on flood risk, and not involve location of caravans in Flood Zone 3."

The EA's flood mapping illustrates that the site is covered by Flood Zones 2 and 3, with the highest risk areas covering the northern, southern and the western edges of the site. It is therefore questionable whether dry access into the site from Cow Lane can be achieved. It is also unclear whether there is sufficient space within the Flood Zone 2 areas of the site to accommodate the 5 pitches requires without encroaching into the higher risk area in Zone 3.

The National Planning Policy Framework (NPPF) advises at paragraph 100 that '*Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk*' and that '*Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property.*' A sequential test is therefore required to determine whether there are more suitable sites available within lower risk areas (Flood Zone 1) in the Borough. It is not clear whether this exercise has been undertaken in the Council reaching the conclusion that this is the only site with potential to accommodate the need.

Thames Properties would therefore argue that the proposed allocation of site WR4 is unjustified and lacks sufficient evidence to justify its inclusion in the Local Plan.

SUSTAINABILITY APPRAISAL (NOVEMBER 2017)

The RBC Sustainability Appraisal (SA) (November 2017) assesses the development options for Policy EM3 and concludes that the preferred approach is for the presumption in favour of the retention of employment land in the CEAs with some limited strategic release. Thames Properties is generally supportive of this conclusion and the proposed release of site WR3a from the Richfield Avenue CEA to accommodate residential development. However as set out above, the Richfield Avenue CEA is unlikely to benefit in the long-term to being restricted to the pure and traditional employment uses that were intended for it through the original CEA designation, and the Local Plan should allow for greater flexibility in this CEA to accommodate ancillary commercial uses that would enhance the overall vitality and viability of the employment area.

The SA assesses Policy WR4 and concludes that the most preferable option is to allocate the site for Traveller pitches as it will reduce unauthorized encampments in the Borough. However, the SA also acknowledges that the proposed allocation will result in a negative or tendency to negative impact on 9 of the SA objectives. According to the SA, this is a worse outcome when compared with the assessment of one of the alternative options, which is to develop the site for offices/leisure/retail. We therefore consider that Policy WR4 is not sufficiently supported by the SA.

DUTY TO COOPERATE

The NPPF outlines (paragraph 159) that in planning for housing, Councils must work with neighbouring authorities to prepare a SHMA for the housing market area and must also cooperate to ensure the needs of the housing market are met. The "Duty to Cooperate" is both a legal requirement, based on the 2011 Localism Act, and a soundness test for plan-making. We are pleased to see that Reading Borough Council has acknowledged its 'Duty to Cooperate' with neighbouring Local Planning Authorities in the Western Berkshire Housing Market Area in order to accommodate its unmet housing need, as outlined in Policy H1, but as set out above we have concerns with whether this can be achieved.

Policy H1 is vague in terms of which neighbouring authorities within the HMA could accommodate the unmet need and simply states that "*The Council will continue to work with neighbouring authorities*" to ensure that the shortfall is met. The Local Plan could be stronger in terms of the Council's commitment to working with neighbouring authorities to ensure that its objectively assessed housing needs are met, as well as in relation to cross-boundary matters such as strategic infrastructure and employment provision.

CONCLUSION

As set out within this representation, not all of the designated CEAs within Reading Borough are necessarily fulfilling the purpose that they were originally intended to serve with respect to employment provision. The Richfield Avenue CEA is one such example, and this is reflected in RBC's proposed removal of the eastern edge of that CEA for residential development. Thames Properties is entirely supportive of this approach, particularly in relation to the allocation of the former Cox and Wyman building for residential development as set out under Policy WR3a.

Thames Properties would, however, suggest that RBC considers the remainder of the Richfield Avenue CEA and whether it is still appropriate for this land to be designated for pure employment uses, which in itself is a term that requires explanation in the Local Plan to determine what uses it seeks to include. Given the growth and change that can be witnessed across the rest of Reading and the locational preference for the larger industrial units closer to existing major transportation routes such as the A33 and M4, we do not consider that it is perhaps no longer appropriate to retain a pure employment designation in this location.

Thames Properties control significant elements of the Richfield Avenue CEA and believe that the Local Plan presents an excellent opportunity to allocate Site EM2g for redevelopment. As set out above, the site is sustainably located with good connections to Reading town centre, Rivermead leisure centre and employment uses, and well placed to deliver a more vibrant, mixed-use scheme which has the ability to still retain an employment focus.

Thames Properties would like to see greater flexibility within the wording of Policy EM3 to accommodate some non-traditional employment uses within the CEAs together with a degree of residential development. Such an approach is considered entirely reflective of the current market demand for employment uses in Reading and the locational preferences of future occupiers, and recognises that the nature of Richfield Avenue as a CEA is changing. Moreover, allowing for a greater variety of uses within the Richfield CEA would serve to improve the relationship between this site and surrounding residential uses to improve the quality of life for existing and future residents, whilst supporting the overall Spatial Strategy.

Moreover, Thames Properties objects to the proposed allocation of the land at Cow Lane for Gypsy and Traveller pitch provision. Thames Properties have concerns with draft Policy WR4 and do not consider that the site has been fully assessed in terms of its suitability to accommodate transit pitches, or the impact that the pitches might have on existing commercial operations.

Thames Properties' representations to the Pre-Submission Draft LP in response to the proposed allocation of the former Cox & Wyman site (draft Policy WR3a) are submitted under separate cover.

We trust that the above representations are helpful to you and await confirmation of their receipt. In the meantime, should the Council have any queries or require any further clarification on any aspect of the above, please do not hesitate to contact the writer.

Yours faithfully,



KATHERINE JONES

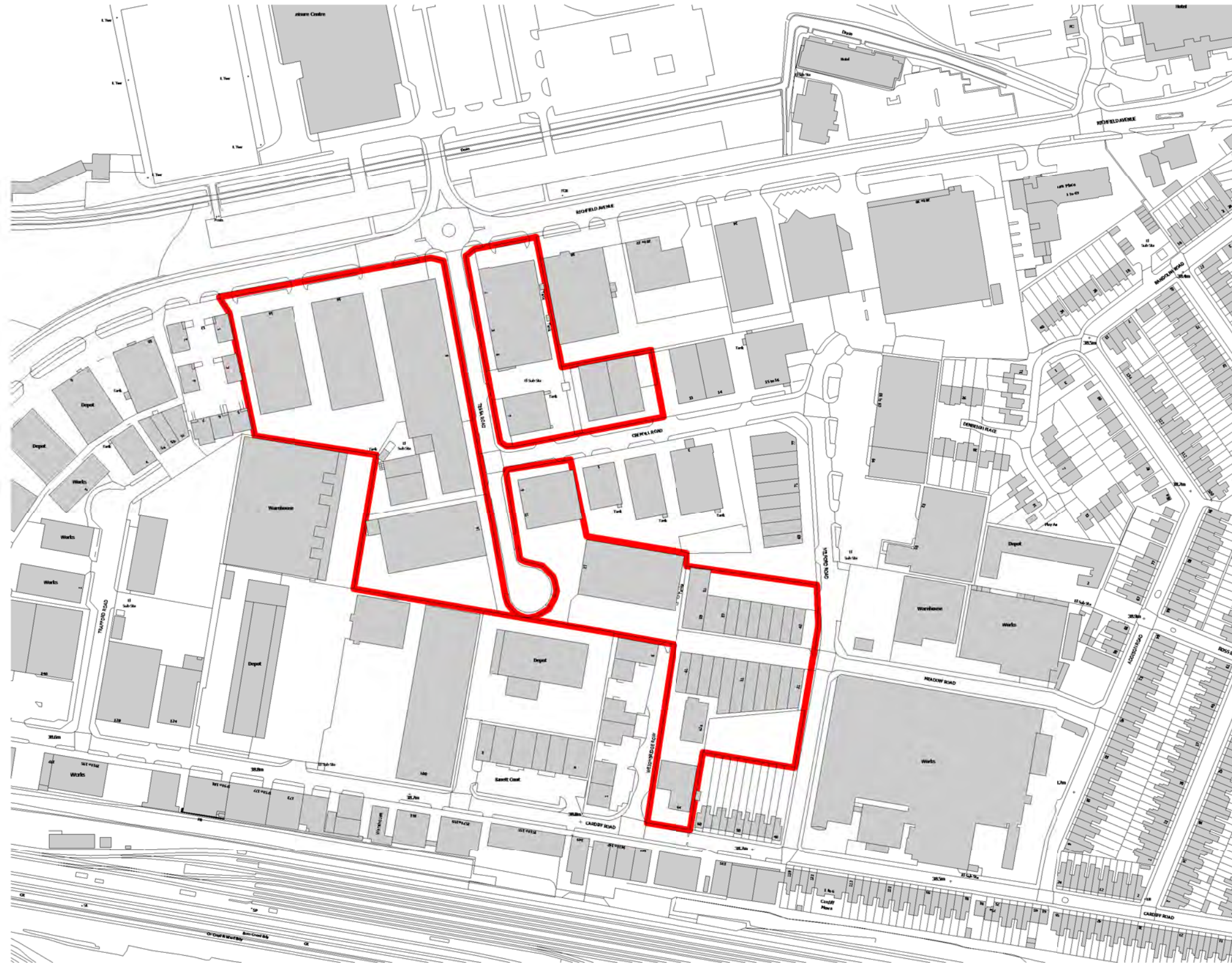
Senior Planner

Encs.

cc. C. Merry, Esq. - Thames Properties Ltd.
S. Fruchter, Esq. - Thames Properties Ltd.

Appendix A – Plan of Thames Properties' Ownership within the Richfield Avenue CEA

Appendix B – Richfield Avenue Core Employment Area (CEA) Market Demand Analysis (January 2018)



— Site Boundary
 3.79 Ha

Project
**Richfield Avenue
 Reading**
 Drawing Title
Site Location Plan

Date	Scale	Drawn by	Check by
02/27/15	1 : 2500 @ A3	TM	TM
Project No	Drawing No	Revision	
24325	PL-100		

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PRIVATE AND CONFIDENTIAL

Reading, Richfield Avenue, Core Employment
Area (CEA)

Market Demand Analysis

26 January 2018

Duncan Campbell BA (Hons) PG Dip Surv MRICS
Director
Campbell Gordon Ltd
50 Queens Road
Reading
Berkshire
RG1 4HU

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1. Executive Summary

This report is provided as part of a continued series of submissions assessing the viability of the Richfield Avenue CEA as it is currently configured.

This report considers the current market conditions and demand for space in the CEA.

The conclusion of this report is that the CEA is not a well suited location for modern industrial occupiers; that there is a lack of amenity provision, and that in the absence of a strategic approach continued piecemeal development through changes of use will lead to a deterioration of the location.

2. Campbell Gordon

Campbell Gordon was established 40 years ago. We specialise in commercial property and development land. The Thames Valley is our main market, we specialise in Reading in particular.

We consistently rank as the Thames Valley's leading independent firm of Chartered Surveyors in a range of categories, including by Transaction Value and Property Availability. Our average share of the Reading office market over the past 5 years is 52%. The two largest transactions last year were on Campbell Gordon instructions. We are also currently advising on or have recently transacted on residential development sites or buildings which will deliver over 900 dwellings.

This level of exposure means we understand the dynamics of the market extremely well.

3. The Author

Duncan Campbell is a Director. He has worked at Campbell Gordon for 14 years. Throughout this time he has specialised in the Reading commercial property and development market.

Duncan has a Post Graduate Diploma in Surveying and is a Member of the Royal Institution of Chartered Surveyors.

4. Description

4.1 Location

The Richfield Avenue CEA is a Reading Borough Council designation. It is one of 13 designated CEAs in the Borough. The boundary shown below is the adopted boundary, the emerging Local Plan proposes a revision to the boundary.

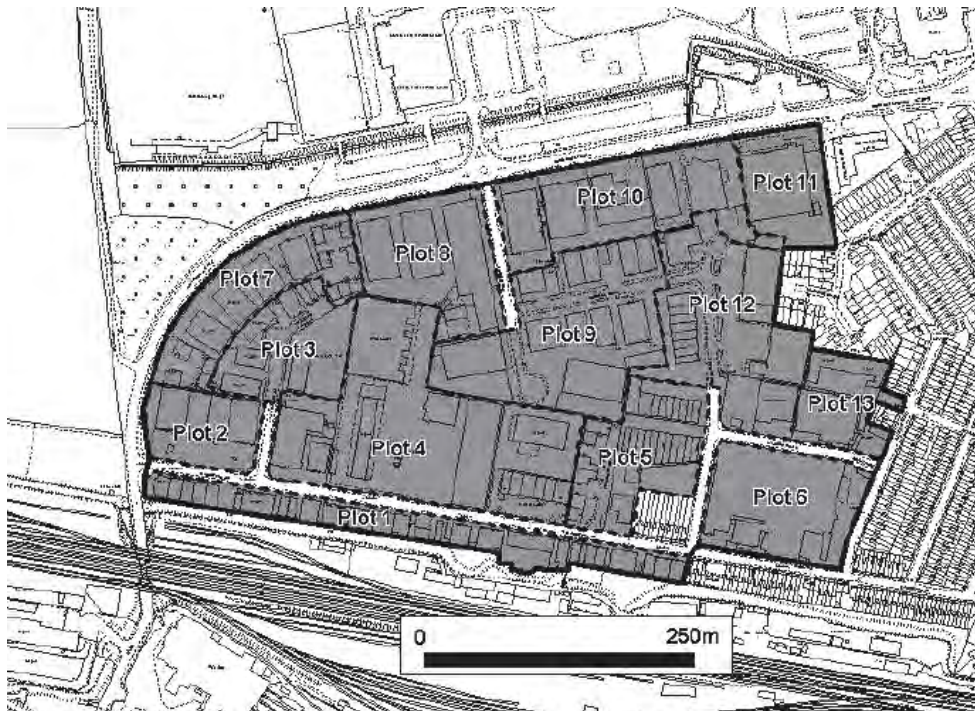
The CEA is adjacent to Reading town centre. It is north of the main railway line and abuts the Inner Distribution Road and Caversham Road to the east. Richfield Avenue itself makes up the northern and western boundaries to the CEA.



Source: Google

4.2 Description Summary

The size of the CEA is approximately 90 acres. It has a total of approximately 1Msq.ft of built form, made up of predominantly industrial units. It also increasing includes a range of other uses including offices, leisure and retail. Terraced housing adjoins the CEA to the east, and includes a small number of units within it, although not within the technical boundary definition, see below:



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Source: See above. Reading Borough Council Employment Land Review Stage 2. 2010.



Source: Google

Most of the industrial units were constructed in 1960s. There has been some limited redevelopment, but most of the stock remains of a relatively old and low quality specification.

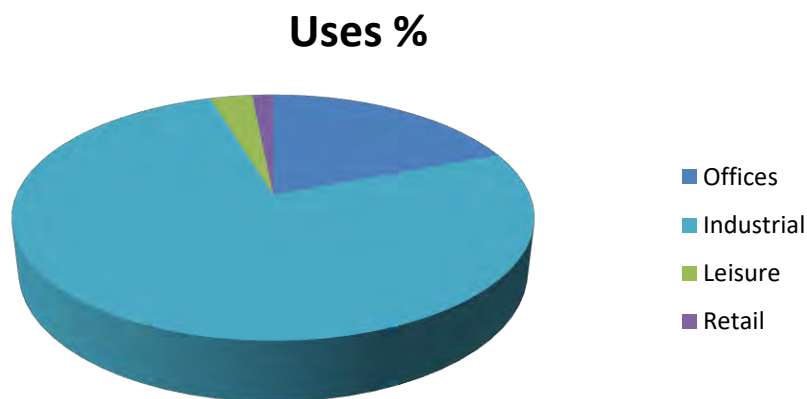
The breakdown of the different uses across the CEA are shown below:

Use	Amount (sq.ft)	%
Office	238,000	19
Industrial	945,000	76
Leisure	39,000	3
Retail	41,000	2

The total of these added together is higher than the total floor area of 1M sq.ft as there are a number of buildings with dual use.

This also does not reveal the number of industrial buildings that have been converted to predominantly office use by their tenants, one such example being 7-9 Cremyll Road.

The proportion of different user types is shown below.



This analysis only shows the commercial property space within the CEA. It does **not** include the following:

- Rivermead Leisure Complex
- Premier Inn
- Crowne Plaza
- Residential properties

These additional use types surround the CEA and substantially influence the character of the area, they also support the commercial viability of each other.

The diversity of use types has continued to grow, an example of this is the change of use of the snooker hall to a church.

5. The Market

5.1 Industrial Demand

5.1.1 *Location*

Industrial occupiers have over recent years demonstrated an ever greater preference for locations that are near to major road junctions, ideally with motorway access. Richfield Avenue CEA is close to the town centre which means access is heavily hampered by congestion, and less easy for large vehicles to access.

There are multiple commercial benefits enjoyed by occupying better locations on main road junctions, including avoiding some negative impacts from the vehicle driving time allowances. For example if a driver arrived in south Reading from the M4, and became caught up in congestion that delayed them from reaching their destination they may have to find somewhere to park for 45 minutes before resuming their journey.

The preference for exceptionally well connected locations has led to speculative industrial developments like Access 12 in Theale (36,000 sq.ft), which was developed 3 years ago, and has direct access to M4 junction 12. Another example is Island Road in Reading (256,000 sq.ft), which was developed approximately a year ago, it has direct access to the A33 and in turn to M4 junction 11. By contrast the Richfield Avenue CEA is believed to have had no new major speculative industrial development for over 10 years. This is because it is not viable, in void risk terms, to do so.

Access 12, Theale:



Island Road, Reading:



5.1.2 *Specification*

Occupiers are increasingly demanding high quality space with a modern specification. For example some of the type of accommodation that is available in the CEA has a very low eaves height clearance, as low as 3 meters, designed for engineering occupiers. However modern industrial occupiers look for large volume storage with eaves clearance of 6-8 meters. If space is not an adequate standard a unit may well stay unlet for years.

If the existing accommodation was demolished and replaced with modern specification space it will certainly enhance its appeal, however it will still have a materially lower appeal compared to space in good locations. This means that the estimated rent will be low and the void periods highly uncertain.

5.2 Office Demand

Office occupiers are also very location sensitive. They will pay a premium to locate either in the heart of the town centre or near motorway junctions.

5.2.1 *Design*

There has however been a new trend developing in the last 1-2 years for occupiers to take open and airy 'studio' type space, or mixed use premises with an exposed services finish, which give a contemporary aesthetic. In the past this type of accommodation has been associated with creative industries however the demand has now entirely entered the mainstream. This type of accommodation has outperformed the rest of the office market.

5.2.2 *Rent*

Developers have focussed on delivering office space into the top slice of the market, in part because of the need to drive returns on land values in the heart of the Central Business District. Therefore very few new build offices have been developed and delivered into the middle part of the market.

5.2.3 *Amenity*

The need for commercial occupiers to have nearby amenity has become a key feature of the market.

Last year office take up in Greater Reading was 377,000 sq.ft, of this 69% was in the town centre. Of the remaining 31% that was out of town over 1/3 was at Green Park which has a very high amenity provision for an out of town location. In other words very little was at low amenity provision out of town locations.

Other out of town locations are trying to rise to this challenge, including for example Arlington Business Park, Theale. In the last few months it has launched a new café, gym and meeting room amenity in order to try to compete.

Campbell Gordon have been the letting agents on Green Park since its development. The consistent message we have heard from occupiers has been the desire for retail and leisure amenity provision. In particular small supermarket or convenience store provision, café and restaurant options, and leisure spaces including gym.

5.3 Diversity & Mixed Use

The impact of these industrial demand and office demand factors has led to changes in the character of employment areas that have not taken a strategic approach in relation to their regeneration and evolution.

The market demand from occupiers for amenity provision has led to iterative changes to many commercial locations originally conceived with a single use in mind. Where this has happened piecemeal the overall integrity and aesthetic has been compromised. There is a lack of a sense of cohesion and ultimately in the quality of the built environment that remains, than would have been the case if a strategic approach had been adopted.

An example of where this has happened nearby is on the Newtown Industrial Estate in Henley-upon-Thames. The aerial below shows the uses that have now been established and are either built, under development, or consented.



Source: Google

By contrast commercial districts that have properly accommodated the market demand for mixed use approaches, and have been well design as a result, include Reading Gateway and the Green Park district:



Reading Gateway – marketing website

There is also increasingly market demand from commercial occupiers to have residential accommodation nearby. For example Huawei are a major office occupier on Green Park. They have a large amount of corporate residential accommodation on the Kennet Island development.

When Green Park village is developed it is envisaged that some of the property will be occupied by people who work on Green Park. Residents will be able to 'ditch their cars' and walk through the footpaths and parkland setting to their place of work.

6. Conclusion

The market has changed radically since the Richfield Avenue CEA was first built:

- Location – industrial occupiers now want to be in much better connected locations that are near to major road junctions, ideally with motorway access;
- Specification – industrial occupiers now demand very different buildings, i.e. higher quality space with a modern specification;
- Amenity – industrial and office occupiers now want nearby amenity provision such as retail and leisure uses in close proximity to their place of work;

- Offices – Office occupiers are keen to locate in town centre locations or near motorway junctions. There is unmet demand for the type of offices that could be delivered in the Richfield Avenue CEA location;
- Change – the pressure to change is universal, but it requires a strategic approach rather than piecemeal change to achieve a successful outcome.

The Richfield Avenue CEA is unusual in that it is a first generation industrial estate close to a major metropolitan 'city' centre in the South East that has not enjoyed a strategic regeneration.

Thames Properties are a large land owner on the estate (indeed the largest by a significant margin), one of the key ingredients required to deliver regenerations.

Another critical requirement for successful regeneration is commercial viability. This means responding to the demands of the market. In practice this means it is essential for a diverse range of complimentary commercial and other uses to be developed that will support the immediate commercial occupiers and the wider community of businesses and residents.

- End -

THAMES WATER



Sent by email to: planningpolicy@reading.gov.uk

thameswaterplanningpolicy@savills.com

 0118 9520 500

25th January 2018

Reading Borough Council – Pre-Submission Draft Borough Local Plan

Dear Sir / Madam

Thank you for consulting Thames Water on the above document. Thames Water are the statutory water and sewerage undertaker for the Borough and are hence a “**specific consultation body**” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

Policy Specific Comments

Policy EN16 - Pollution and Water Resources

Thames Water would like to support Policy EN16 and its supporting text. Following our comments made to the draft Local Plan in June 2017, we are pleased to see the additional supporting text at paragraph 4.2.91.

Policy EN18 – Flooding and Sustainable Drainage Systems

We would like to support policy EN18 and its requirement for all major developments to incorporate SUDs in line with the Government’s technical standards

Policy H5 – Standards for New Housing

We would like to support Policy H5, specifically part b and supporting paragraph 4.4.42 which deals directly with water efficiency and the requirement for all new build housing to meet 110 litres per person per day.

Policy SR5: Leisure and Recreation Use of the Kennetside Areas

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.

If the Council decide to proceed with the above policy we would request that the last paragraph of the Policy is amended to read:

*“Any proposals will need to demonstrate that there will be no adverse impacts on biodiversity, flood risk, landscape, public foot and cycle access along the river and the operation and condition of the river **and the operation of the adjacent Water Treatment Works**. If a proposal results in additional use of the Kennet by boats, it should not have an adverse effect on the River Kennet Site of Special Scientific Interest further upstream.”*

And the additional text included as supporting text

“Thames Water should be contacted at the earliest opportunity to discuss any potential proposal.”

Site Specific Comments

The pre submission draft has proposed some differences in dwellings numbers for the draft allocations, but not of any significance, as such our comments in relation to water supply and waste water network remain as previously submitted, and which are attached again for reference.

In relation to sewage treatment capacity, the projected population growth within the area will increase demand for sewerage treatment, placing increased pressure on the treatment works. We are in the process of assessing available headroom and options to accommodate growth in the long term at Reading STW, as such early engagement and confirmation of delivery rates would be valuable to inform the assessment.

With the above in mind Thames Water supports the statement *“give early consideration to the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required”* which is included within a number of the site specific allocation policies

We trust the above is satisfactory, but please do not hesitate to contact my colleague Carmelle Bell at the above number should you have any queries.

Yours sincerely

Richard Hill
Head of Property

Site ID	Site Name	Water Response	Waste Response	Additional Comments
49948	CA1a Reading University Boat Club, Promenade Road, Reading (A13)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
21925	CA1B Part of Reading Golf Course Kidmore End Road (A19)	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	
1447	CA1c Land at Lowfield Road, Reading (B51)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
49953	CA1d Rear of 200-214 Henley Road, 12-24 All Hallows Road & 7 & 8 Copse Avenue, Reading (A20)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
49955	CA1e Rear of 13-14a Hawthorne Road & 282-292 Henley Road, Reading (A21)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	

49960	CA1f Land rear of 1&3 Woodcote Road & 21 St Peter's Hill, Reading (A26)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
49967	CR11a Friar Street & Station Road Reading (B1)	The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	

49969	CR11b Greyfriars Road Corner, Reading. (B2)	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	
49970	CR11c, Station Hill, Reading.	<p>The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>

49936	CR11d Brunel Arcade and Apex Plaza Reading (A1)	<p>The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.</p>	<p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>
49973	CR11e North of the Station, Reading. (B4)	<p>The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build</p>	<p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>

55129	CR11F: West of Caversham Road	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>
49975	CR11g Riverside, Reading. (B5)	<p>The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>

16630	CR11h NAPIER ROAD JUNCTION	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>
21922	CR11i Napier Court Napier Road Reading (B7)	<p>The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>

49982	CR12a,Cattle Market, Reading (B8)	<p>The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.</p>	<p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>
42997	CR12b, Great Knolly Street & Weldale Street, Reading (B9)	<p>The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.</p>	<p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>

49987	CR12c, Chatham Street Reading (B17)	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>
55130	CR12d, Broad Street Mall	<p>The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>

49983	CR12e Hosier Street, Reading (B12)	<p>The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>
49984	CR13a Reading Prison (B13)	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	

49985	CR13b Forbury Retail Park (B14)	<p>The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>
20122	CR13c Kenavon Drive, Reading, (B15)	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	

49986	CR13d Gas Holder, Kenavon Drive, Reading (B16)	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	
55136	CR14a Central Swimming Pool, Battle Street	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>The comments above is based on foul water discharge to the public sewer by gravity (NOT PUMPED) and surface water is not discharged to the public sewer.</p>

49990	CR14b Former Reading Family Centre, North Sreet (B19)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
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55137	CR14c 17 -23 Queen Victoria Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
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49942	CR14d 173 -175 Friar Street and 27-32, Reading (A6)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
49996	CR14e 3-10 Market Place, Abbey Hall & Abbey Square, Reading (B22)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the vicinity of Market Place area within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early

				consultation concerning any proposed development.
55138	CR14f 1-5 King Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the vicinity of Market Place area within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development.
50002	CR14g The Oracle Extension, Bridge Street & Letcombe Street, Reading. (B26)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	

55139	CR14h Central Club, London Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the vicinity of Market Place area within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development.
55140	CR14i Enterprise House, 89-97 London Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the vicinity of Blakes Lock area within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development.

50006	CR14j Corner of Crown Street & Southampton Street, Reading. (B28)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
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50007	CR14k Corner of Crown Street & Silver Street Reading	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p> <p>There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or</p>
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				would come within 3 metres of, a public sewer.
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52315	CR14I 187-189 & 191 Kings Road Reading RG1 4EX	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
50013	CR14m Caversham Lock Island, Reading (B33)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water

				would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
55160	ER1a The Woodley Arms PH, Waldeck Street	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	There are public sewers crossing this site.

48389	ER1b 3 - 5 Craven Road, Reading, RG1 5LF	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known. There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer.
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49956	ER1c Rear of 8-26 Redlands Road, Reading (A22)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
49957	ER1d Land adjacent to 40 Redlands Road, Reading (A23)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.

48240	ER1e St Patricks Hall 20 Northcourt Avenue Reading RG2 7HB	The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	
55162	ER1f Hamilton Centre, Bulmershe Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
49952	ER1g Alexander House, Kings Road, Reading (A18)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water

				would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
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55164	ER1h Arthur Hill Swimming Pool, 221-225 Kings Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known. There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer.
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21816	ER1i 261-275 London Road Reading (B34)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	The total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
55166	ER1k 131 Wokingham Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
49966	SR1a, Former Landfill, Island Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Where development is being proposed within 800m of a sewage treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new

				occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.
35248	SR1b Land North of Island Road Reading RG2 0WR	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	

49963	SR1c Island Road, Longwater Avenue, A33 Frontage	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>The development being proposed within 800m of a Reading Sewage Treatment Works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.</p> <p>There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would</p>
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				be over the line of, or would come within 3 metres of, a public sewer.
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50016	SR2 Land north of Manor Farm Road, Reading (B39)	<p>The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>This Development is likely to be above the current water treatment capacity to supply and would require significant investment to supply.</p>
55135	SR3 South of Elgar Road Major Opportunity Area	<p>The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.</p>	<p>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	

55141	SR4a Pulleyn Park, Rose Kiln Lane	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>
55142	SR4b Rear of 3-29 Newcastle Road	<p>On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>There are Thames Water assets near this site.</p>

55143	SR4C 169-173 Basingstoke Road	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	There are Thames Water assets near this site.
49962	SR4d 16-18 Bennet Road, Reading (A28)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
55144	SR4e Part of Former Berkshire Brewery Site	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	

55145	SR4f Land South West of Junction 11 of the M4	<p>Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan.</p>	<p>Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan.</p>	
13129	WR1 Dee Park Estate, Tilehurst, Reading (B49)	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Thames Water have upgraded infrastructure downstream of this site to accommodate the proposed development. Further consultation would be required if changes to the previously proposed development were made.</p>

50018	WR2: Park Lane Primary School, The Laurels & Downing Road, Tilehurst, Reading (B46)	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
49946	WR3a Former Cox & Wyman Site, Cardiff Road, Reading (A9)	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.

55146	WR3b 2 Ross Road & Part of Meadow Road	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>
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55147	WR3c 28-30 Richfield Avenue	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>There are Thames Water assets on this site. Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.</p>
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55148	WR3e Yeomanry House, Castle Hill	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
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55149	WR3f 4 Berkeley Avenue	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
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20333	WR3G 211 - 221 Oxford Road & 10 & rear of 8 Prospect Road Reading (B41)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
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21919	WR3h Rear of 303-315 Oxford Road Reading (B42)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the total development identified in the sewerage catchment draining to Blakes Lock SPS within the Reading development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale of overall development in the catchment is known.
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21794	WR3i Part of former Battle Hospital Portman Road (B48)	The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
55150	WR3j Land at Moulsoford Mews	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
34626	WR3K 784-794 Oxford Road Reading RG30 1EL (B47)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
55151	WR3L 816 Oxford Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	

55152	WR3m 103 Dee Road	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	There are public sewer crossing this site.
55153	WR3N Amethyst Lane	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
34352	WR3o Meadway Centre, Reading, RG30 (B50)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
21818	WR3p The Alice Burrows Home, Dwyer Road Reading (B45)	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	There are public sewers crossing this site
55154	WR3q Norcott Community Centre, Lyndhurst Road	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	

28523	WR3r Charters Car Sales, OXFORD ROAD, READING	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
55155	WR3s Land at Kentwood Hill	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
55156	WR3t Land at Armour Hill	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	

THAMMAN, VIJAY

From: Vijay Thamman
Sent: 26 January 2018 11:54
To: Planning Policy
Subject: Proposed Policy WR4: Potential Traveller Transit Site at Cow Lane

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

Dear Sirs

Objection to Proposed Policy WR4: Potential Traveller Transit Site at Cow Lane.

We wish to express our concern at the potential allocation of the above Site for a Gypsy and Traveller Transit Site and object in the strongest possible terms to the inclusion of this land in the Local Plan.

We understand that the current proposal is for 5 pitches to be located on the Site, along with supporting facilities. We understand that the Council is required as a matter of law to assess the need for all types of housing as part of their Local Plan process, but this requirement does not extend to the allocate sites to deal with that need that are unsuitable for the purpose. The Council has a duty to properly assess the planning merits of any allocation of land, including flood risk, the impact on the neighbouring properties, the character of the area as well as the impact on the surrounding road network and viability of the area. As such, there are a number of significant issues with the Council's proposal.

The Council has lighted above the option of allocating of transit site as a way of reducing the number of unauthorised encampments in and around Reading. This logic is flawed.

There are a number of transit sites in the neighbouring authorities which are now used as permanent pitches. The creation of a transit site results in the proliferation of unauthorised pitches in the immediately surrounding area to the Site.

Adjacent to the above Site is a large area of open space which currently hosts the annual Reading Festival. The creation of an enclave within Reading for businesses in and around Richfield Avenue/Cow Lane has been a deliberate strategic policy of the Council for a number of years and we have a number of tenanted properties in this area. The introduction of a Transit Site does not fit within that strategic policy and does not fit within the character of the area.

The Reading Festival and these businesses generate a significant amount of business for the local economy. It does not appear that any thought has been given into the potential impact that the allocation of a Transit Site would have upon these businesses.

Indeed recently this site has been used as an unauthorised encampments and there has been considerable impact of those businesses already. Something that the police are aware of. As such there is a very high risk that the unauthorised encampments on this land would have a significant and highly detrimental impact on the economy of Reading as a whole. Moreover, the allocation of a transit site in the above location is likely to increase the amount of spending that the Council will have to incur in removing clearing unauthorised encampments. The viability of the proposal is therefore fundamentally flawed on the basis of this location.

If the Council is wedded to the idea of providing a transit site within the Borough, then a more suitable site should be sourced. The Council suggests that they have undertaken a thorough assessment of the alternative sites available, but many appear to have been dismissed for less fundamental issues.

In short, the allocation of this Site for a Transit Site is ill-thought through and will not address the fundamental issues facing the Council.

Yours sincerely

Vijay Thamman on behalf of H&T Properties Ltd

Click [here](#) to report this email as spam.

THE THACKERAY ESTATE

Reading Borough Council
 Pre-Submission Draft Local Plan
 November 2017
 Representations Form



Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title		
First Name		Paul
Last Name		Bottomley
Job Title <i>(if applicable)</i>		Planning Consultant
Organisation <i>(if applicable)</i>	The Thackeray Estate	Town Planning Bureau
Address 1	28 Ives Street	The Barn
Address 2		43 Oakdene Road
Address 3		Redhill
Town	London	Surrey
Post Code	SW3 2ND	RH1 6BT
Telephone		01737 390169
E-mail		info@tpbureau.co.uk

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy H12

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input type="checkbox"/> *	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> *
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/> *	No	<input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

<p>We consider that it is also appropriate to locate student accommodation in the town centre, given the accessibility of the centre and the range of facilities available and the need to help regenerate and improve the vitality and viability of the area.</p> <p>In particular we consider student accommodation would be an appropriate use as part of a mixed development of our clients' site, 138-148 Friar Street, which is located in the heart of central Reading in Sub Area 1 of the Station/River Major Opportunity Area. Such a use would, in our opinion, be in accord with Policy CR6.</p>
--

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Amend the first sentence of Policy H12 as follows (amendment shown in red):-

*New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation, **or on suitable sites within the town centre.***

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

So as to fully explain our argument.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

yes

Please keep me informed of all planning policy matters:

yes

THEATRES TRUST

Protecting theatres for everyone



Ref.: TC/7935

26 January 2018

Planning Policy
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

By e-mail: planningpolicy@reading.gov.uk

Pre-Submission Draft Local Plan

Thank you for consulting the Theatres Trust on Reading's Pre-Submission Draft Local Plan. Please find our comments outlined below.

Thank you for consulting the Theatres Trust on the 'Pre Submission Draft Reading Borough Local Plan'. The Trust generally considers the Plan to be legally compliant and sound but we wish to make representations on this document and suggest some minor modifications as set out below:

Vision

The Trust welcomes the promotion of Reading as a "place for culture, leisure and entertainment", and the Plan's recognition of Reading's expanding role as a centre for arts and culture.

Paragraph 4.2.2

The Trust supports the Plan's appreciation of investment in heritage and culture being a catalyst for investment and spending in the local economy.

Policy RL6 – Protection of leisure facilities and public houses

The Trust supports this policy and considers that it accords with Paragraphs 70 and 156 of the NPPF, particularly the strong presumption in favour of retaining facilities and recognition that evidence to support loss of a facility must be based on long-term issues rather than short-term economic circumstances or poor management. The requirement for alternative facilities to serve a similar role, be accessible and have sufficient capacity to serve the existing catchment will help to secure facilities for the long term social and cultural wellbeing of local people.

West Side Major Opportunity Area – Site CR12 (Hosier Street)

Paragraph 5.4.17 asserts that for some time there has been a need to replace the Hexagon in that the theatre is not suited to modern theatre requirements and is expensive to maintain. The Trust doesn't agree that the Hexagon is in need of replacement, nevertheless we welcome that any development of the theatre will only be acceptable if a replacement facility is provided and

Theatres Trust

22 Charing Cross Road, London WC2H 0QL

T 020 7836 8591

F 020 7836 3302

E info@theatrestrust.org.uk

W theatrestrust.org.uk

Chair Tim Eyles **Director** Jon Morgan

Trustees Richard Baldwin, David Blyth, Pam Bone, Paul Cartwright, Paddy Dillon, Ruth Eastwood, David Ian, Richard Johnston, Gary Kemp, Dara Ó Briain, Simon Ricketts, Peter Roberts, Ann Skippers, Anna Stapleton

The National Advisory Public Body for Theatres

The Theatres Trust Charitable Fund co-operates with Theatres Trust, has the same Trustees and is registered as a charity under number 274697

“approaches to the theatre will be improved”. To ensure the future provision and sustainability of theatre and live performance in Reading and support its role as a centre for arts and culture as articulated in the Plan’s Vision, the Trust requests that Paragraph 5.4.17 reinforces the requirements for re-provision as outlined in Policy RL6. It is also suggested that additional detail is included requiring applicants and the Council to work with the Theatres Trust and/or recognised theatre operators/architects to ensure any replacement venue is appropriately designed so as to be functional and meet the needs of audiences and performers.

We look forward to being further updated on the progress of your new Local Plan as it moves towards adoption.

Tom Clarke
National Planning Adviser

THOMAS, ROBIN

From: robin thomas
Sent: 25 January 2018 16:51
To: Planning Policy
Subject: Draft Local Plan Section EN7N

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

Dear Sirs/ Madams,

I have the following questions related to the draft Local Plan Section EN7N Item EN7Nn:

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
 - a. Traffic movements
 - b. Air pollution
 - c. Noise pollution
 - d. Visual dominance and overbearing on the area of the site where they propose to build
 - e. Privacy and overlooking
 - f. Out of character with local residential properties
 - g. Light pollution
 - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
 - i. Hours of operation
 - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

I look forward to your early reply.

Kind Regards,

Robin Thomas

Click [here](#) to report this email as spam.

THOMAS, ROSEMARY

From: rosemary thomas
Sent: 23 January 2018 22:08
To: Planning Policy
Subject: Orchestrated complaints about Mapledurham Playing fields

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

Dear Sirs

I have received an email with instructions on how to contact you and which questions to ask.

I am fed up with being used as incipient complaint fodder and don't ask you any questions.

Rosemary

Click [here](#) to report this email as spam.

TILEHURST ALLOTMENTS SOCIETY

Reading Borough Council
Pre-Submission Draft Local Plan
November 2017
Representations Form



Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices, Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title	Mrs	
First Name	Jennifer	
Last Name	Cottee	
Job Title <i>(if applicable)</i>	Secretary	
Organisation <i>(if applicable)</i>	Tilehurst Allotments Society	
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

WR3t- The land at Armour Hill.

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

The section is sound. Regarding this part of the Local Plan the wording and sense are consistent with other parts of the document eg EN8 . Furthermore the wording reflects findings at an earlier planning inquiry and instructions of planning inspector to prevent piecemeal development of land owned by the Tilehurst Pools Lands Charity .

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

None suggested: retain as is.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

Allotment plot-holders are pleased with the protection to the allotments offered in the pre-submission draft and have no additional requests.

However if there were a suggestion to modify the text protecting the use and functionality of the land currently used as allotments the allotment tenants would wish to their voice to be heard at the inquiry. Members of Tilehurst Allotments Society Committee have a long experience of the use of the allotment site , and understanding of how the planning process affects development of land. They wish the local plan to be an effective planning tool throughout its 20 year life. A representative of the Society could illustrate the problems that would arise if constraints on potential development of the land were loosened.

B7. Do you wish to be kept informed of planning policy matters? (please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

 yes

Please keep me informed of all planning policy matters:

 yes

TILEHURST POORS LAND CHARITY

Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title		Mrs
First Name		Zahra
Last Name		Waters
Job Title <i>(if applicable)</i>		Planner
Organisation <i>(if applicable)</i>	Tilehurst Poor's Lands Charity (Registered Charity No. 204048)	Lichfields
Address 1	c/o Agent	7 The Aquarium
Address 2		1-7 Kings Street
Address 3		
Town		Reading
Post Code		RG1 2AN
Telephone		0118 334 1920
E-mail		Zahra.waters@lichfields.uk

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Allocations WR3t, WR3s and EB7Wu

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please see covering letter regarding Polices WR3t, WR3s and EB7Wu.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

N/A

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

The Charity would be happy to respond to any queries the Local Plan Inspector may have on the technical and design documents they have submitted to support these allocations.

B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

Planning Policy Team
Reading Borough Council
Bridge Street
Reading
RG1 2LU

Date: 26 January 2018
Our ref: 15037/DL/ZA/15287070v5
Your ref:

Dear Sir/Madam

Representations to Reading Borough Council Pre-Submission Draft Local Plan in Respect of Land at Kentwood Hill, Tilehurst (Site ref. WR3t, WR3s and EN7Wu)

This letter forms representations to the Reading Borough Council (RBC) Pre-Submission Draft Local Plan Consultation (December 2017) (hereafter the emerging plan) which are submitted on behalf of our clients, Tilehurst Poor's Lands Charity (the landowners).

Representations including Indicative Masterplans, Ecological Appraisal, Site Access Appraisal and Initial Landscape and Visual Appraisal, were submitted on behalf of our client to the previous Local Plan consultation in June 2017.

In essence these representations summarise the substantive design and technical work undertaken to date by the land owners, comment on both the representations received by RBC in respect of the earlier iteration of the Local Plan and the draft policies relating to the site (including the amendments within the submission – which respond in part to the earlier consultation) and the landowners response to these amendments.

Background

The Tilehurst Poor's Lands Charity was initially created to provide fuel for the poor of the Parish. Over time the Charity's aims have broadened to provide support for those in need within Tilehurst, with the provision of grants to local people to provide much needed items such as furniture, clothes or white goods. As the name suggests, the Charity owns land, some of which has been sold and the proceeds invested, so that the Charity's income comes from both investments and rents.

The Charity owns land at Kentwood Hill, Tilehurst, as shown on the submitted Site Location Plan which, as we summarise below, has long been recognised as a potential development location.

The land ownership extends to 6.6ha in total and comprises the following land uses (which are identified on the Site Location Plan):

- 1 Builder's Yard
- 2 Non-Statutory Allotments

- 3 Recreation Ground
- 4 Two areas of grass/scrubland
- 5 Tree filled area

The site is located in a residential area, less than 130 metres from the local centre (the Tilehurst Triangle) which provides a wide range of local services and amenities. It is well served by public transport and in close proximity to a number of facilities including schools and GP surgeries.

Given the site's location and proximity to services, as expanded upon below, it forms a highly sustainable location which is capable of providing much needed additional housing (including family housing) in Reading.

Site History

The site, other than the previously developed area (the builder's yard) is currently allocated as Public and Strategic Open Space under Policy SA16 of the RBC Sites and Detailed Policies Document. The tree filled part of the site is a Local Wildlife Site and Major Landscape Feature and includes a number of trees which are subject to Tree Preservation Orders.

The previously developed area of the site (the builder's yard) has been the subject of considerable discussion and analysis during the preparation of the Sites and Detailed Policies Document (SDPD) where it was initially identified for residential development for 11-17 dwellings (Policy SA8 of the draft SDPD). However, the allocation was excluded from the SDPD (adopted October 2012) upon the recommendation of the Inspector who considered it would result in piecemeal development that would not address the future of the wider site.

Specifically in relation to Policy SA8, the Local Plan Inspector stated:

"Both the site allocated in the DPD and the enlarged site advanced by the site owner would result in piecemeal development that is not well related to the surroundings. There would be uncertainty as to the future of surrounding parcels of land. A comprehensive approach is required 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. Consequently as this policy is not justified by the evidence and contrary to national planning policy it is unsound and should be deleted."

The Inspector's key consideration in resisting the allocation is that it represented piecemeal development and should instead have been considered holistically with the surrounding parcels of land (namely the recreation ground, allotments and scrubland/tree area). He did not question the overall suitability of this location for residential development – indeed the proposed allocations within the emerging Local Plan deliver the "comprehensive approach" sought by the earlier Local Plan Inspector.

Consideration of the Site within the emerging Local Plan

Following the consideration of the site within the earlier SDPD process the site has been considered by RBC from the outset of the emerging Local Plan process.

Issues and Options Consultation (February-March 2016)

The site was identified within the Issues and Options (IOP) document which was consulted on in February-March 2016 as site A14: Allotments and Adjacent Land. The IOP identified a number of options for the future of the site including full development, partial development and no allocation. We submitted

representations to the consultation on behalf of our client supporting the development of the site for residential development.

Housing and Economic Land Availability Assessment (April 2017)

The site has also been identified in the recent RBC Housing and Economic Land Availability Assessment (HELAA) (April 2017) as site KE008. The HELAA identifies that the site is available and potentially suitable for residential development with the allotments retained and residential development on the land at Kentwood Hill and Armour Hill.

Consultation with Reading Borough Council

Following our consultation response to the Issues and Options Document RBC have sought clarification on the development potential of the site. The clarifications provided by our client underpin the approach taken in the emerging Local Plan, which our client supports, of the recreation ground, allotments and tree filled areas being retained as open space, with the remaining areas of the site allocated for residential development.

Draft Allocation (April 2017)

The draft Local Plan (April 2017) split the site into three proposed allocations two of which are for residential development (allocations WR3s and WR3t) and a proposed Local Green Space (policy EN7Wu). The draft Local Plan also identified a tranche of land both within and beyond the site as an Area of Identified Biodiversity Interest and (Policy EN7) and a Major Landscape Feature (Policy EN 13).

We submitted representations to this consultation including Indicative Masterplans, Ecological Appraisal, Site Access Appraisal and Initial Landscape and Visual Appraisal. These representations supported the draft allocation of the site within the emerging Local Plan.

Following the consultation the Council published their Statement of Consultation which provided summaries of the consultation responses received. A total of 8 comments (including 2 objections) were received in relation to draft allocation WR3s and 28 comments in relation to WR3t (including 6 objections). The majority of the comments received were from existing allotment owners requesting the retention of the access and parking to the allotments – this is now addressed within the latest iteration and we expand upon this below.

Further Consultation with Reading Borough Council (October 2017)

Following the consultation on the draft Local Plan, further discussions with Council Officers took place in relation to the retention of the access and parking for allotments within draft Policy WR3t as Officers responded to the consultation responses received. Our clients confirmed they were prepared to accept the proposed alteration to the policy. Our clients have also confirmed they intend to retain (or provide an alternative) water source and maintain taps for the allotments users.

Pre Submission Draft Reading Borough Local Plan (November 2017)

As set out in our previous representations, our clients support the principles and broad specifics of the draft allocations in relation to the site (namely allocations WR3s, WR3t and EN7Wu). In addition to RBC's evidence base and analysis (which underpins these allocations) the additional evidence base prepared and submitted by our clients (and expanded upon in our previous representations) confirms the appropriateness of this location for residential development.

Some minor changes to the wording of the draft allocations has been proposed within the Pre-Submission Plan, and this is summarised below:

Proposed Policy WR3s – Land at Kentwood Hill states (changes in bold):

“Development for residential.

Development should:

- *Be supported by information showing how development fits within a comprehensive approach to the whole area (including W3t and the protection of the neighbouring allotments and recreations ground);*
- *Assess and mitigate and impacts of the Kentwood Hill/Norcot Road/School Road junction;*
- *Provide adequate footway/cycleway provision to link into existing routes;*
- *Include a landscaped border to Kentwood Hill;*
- *Provide for **well-vegetated** green links between the copse and the Victoria Recreation Ground, and between the copse and Kentwood Hill;*
- *Avoid adverse impacts on important trees including those protected by TPO, **and on the stream in the copse;***
- *Avoid any detrimental impacts upon biodiversity, and provide for biodiversity net gain wherever possible;*
- *Avoid adverse visual impacts on the West Reading Wooded Ridgeline major landscape feature, **and ensure views can be gain through the site from the recreation ground and neighbouring streets towards the Chiltern escarpment;***
- *Take account of potential archaeological significance; and*
- *Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.”*

The policy then goes on to identify a capacity of 41-62 dwellings on the 1.43ha site. Our clients support the proposed allocation of the site, and as previously discussed, consider a capacity of 62 dwellings to be an appropriate allocation. Our clients support the proposed amendments to the policy.

Land at Armour Hill (WR3t)

Policy WR3t – Land at Armour Hill provides similar criteria to Policy WR3s with the following differences,

- *Assess and mitigate any impacts on the Armour Hill/Kentwood Hill junction;*
- ***Ensure that there is no reduction in vehicle access to, parking for and security of the allotments;***
- *Include a landscaped border to Armour Hill;*
- *No reference to the need for green links*

The policy then goes on to identify a capacity of 12-18 dwellings on the 0.45ha site. Our clients support the proposed allocation of the site, and as set out previously, consider a capacity of 18 dwellings to be an appropriate allocation. Our clients support the proposed amendments to the policy.

Whilst the compliance of any application proposals against the draft policy criteria within both housing allocations (including the proposed amendments summarised above) would be fully assessed at the planning application stage we have undertaken a review of this, informed by the technical work undertaken to date

(including the illustrative masterplans) and anticipate that the requirements set out in the policy would be able to be met within any proposed development scheme, including a suitable access.

Our clients support the residential allocation of the areas at Kentwood Hill and Armour Hill at the higher end of the proposed capacities identified (62 and 18 respectively). In addition, we note the comments made by RBC in the emerging Plan (para 7.3.13) where it is acknowledged that the capacity of allocated sites will ultimately depend on various factors that need to be addressed at the application stage. This is also mentioned in the Statement of Consultation, where RBC responded to a response received in relation to the Armour Hill site that *“the Plan accepts that the final total may be outside the range specified where it can be justified.”* Our clients are supportive of these comments, which mean the sites would have scope to maximise their contribution to the *“pressing need”* for further housing in Reading and also provide a substantial level of additional family housing as sought by the emerging plan.

Our clients also support the retention of the allotments and recreation ground as local green space/public open space (allocation EN7Wu).

Summary and Conclusions

The Tilehurst Poor’s Lands Charity commends the overall approach taken by RBC in assessing the evidential technical basis for residential development on the site drawing in part on the substantial technical work undertaken by the land owner (as submitted as part of our previous representations) which underpins the allocations and confirms that the specific requirements identified for both allocations are capable of being met. In addition RBC have also proposed alterations to the policies in response to the key issues raised at the consultation stage.

The Charity supports the proposed draft allocations of the land at Kentwood Hill (namely sites WR3s, WR3t and EN7Wu) within the draft Local Plan. The site’s location within a sustainable location means it is suitable for this level and type of residential development, whilst the allotment and recreation ground areas of the site are to be retained in their existing use.

We trust that these comments assist with the preparation of the Local Plan and would be happy to provide any clarifications which may be sought by the Local Planning Authority or the Local Plan Inspector– please contact Zahra Waters or myself if you require any further information.

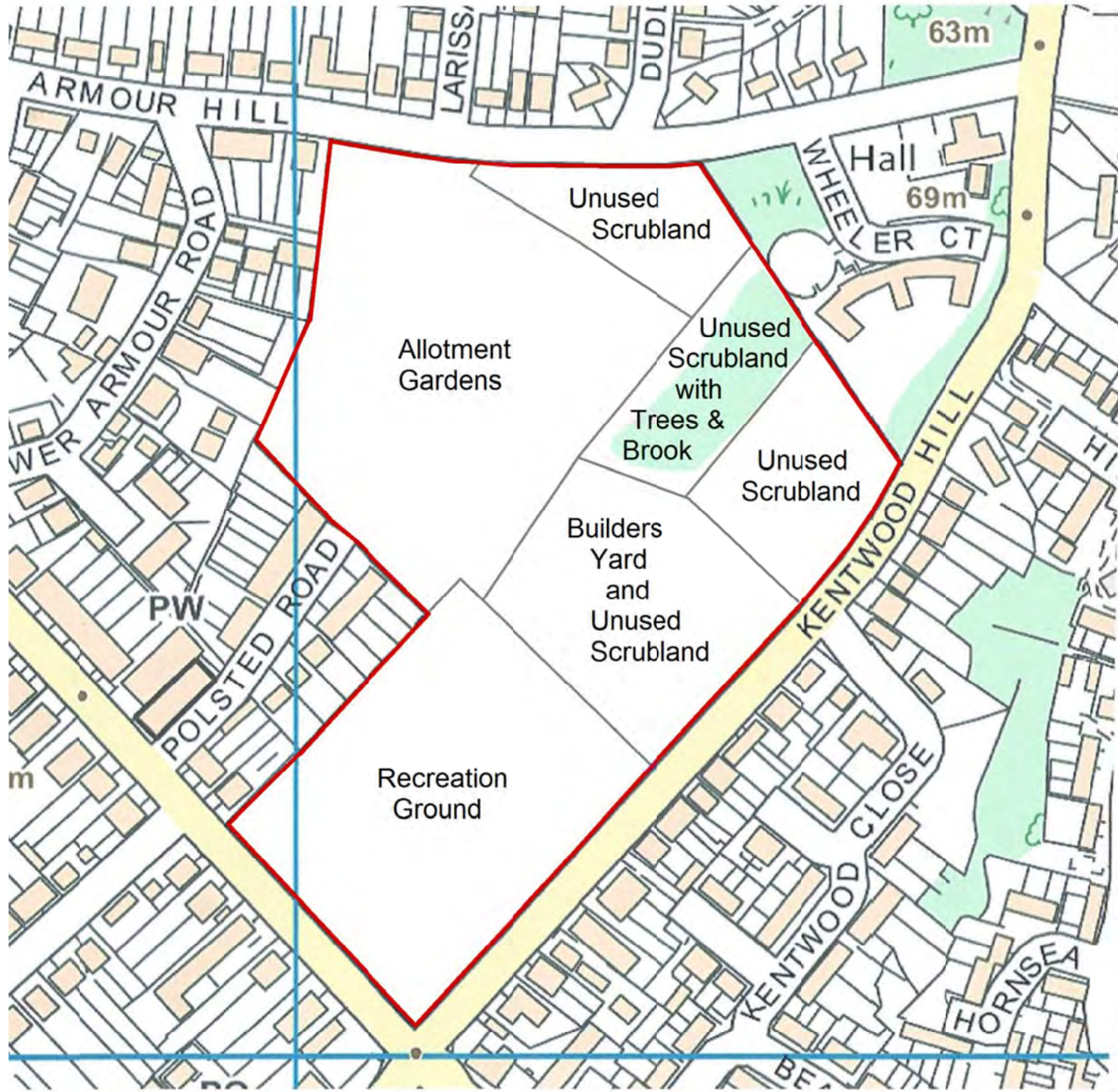
Yours faithfully


Daniel Lampard
Senior Director

Copy

C Cairns
R Duncan

- Tilehurst Poor’s Lands Charity
- Chaney’s Chartered Surveyors



Key:
 — Candidate Site for Housing with some provision for community leisure space

Land at Kentwood Hill, Armour Hill, Polsted Road and Armour Road in Tilehurst, Reading

Landowner:
 Tilehurst Poor's Land Charity (Regd Charity No. 204048)

Drawing:
 Site Location Plan

Scale:
 Approx 1:2000 @ A3

Date:
 October 2015

TRANSPORT FOR LONDON

From: Carr Richard <RichardCarr@tfl.gov.uk>
Sent: 25 January 2018 10:16
To: Planning Policy
Cc: 'Jorn Peters'; Fairweather Gareth; Wallace Andrew (London Rail); Julie Davis; Orlik Will (Crossrail); Ranaweera Rohan; Kalaugher Margaret (London)
Subject: RE: Reading Borough Local Plan - chance to comment on Pre-Submission Draft Local Plan
Attachments: Reading Borough Draft Local Plan consultation - TfL comments

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Thank you for consulting Transport for London (TfL). We provided comments on the previous draft in June 2017 (response enclosed). We are pleased to note that all our comments and suggestions in relation to Crossrail safeguarding have been taken into account and relevant amendments have been made to the pre submission draft. We welcome these changes.

Since the previous round of consultation, the draft Mayor's Transport Strategy has been published and the new draft London Plan is now out for consultation. We would be grateful, if you would consider extending some of the Mayor's strategic transport policy objectives to the borough including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger

I trust these comments are helpful

Best wishes
Richard Carr

Richard Carr | Principal Planner (Borough Planning)
TfL Planning, Transport for London
E: richardcarr@tfl.gov.uk
A: 9th Floor, 5 Endeavour Square, E20, Westfield Avenue, E20 1JN

I work part time and so there may be a short delay in responding to emails

For more information regarding the TfL Borough Planning team, including TfL's *Transport Assessment Best Practice Guidance*, and pre-application advice please visit <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>

From: Planning Policy [<mailto:planningpolicy@reading.gov.uk>]
Sent: 30 November 2017 11:20
Subject: Reading Borough Local Plan – chance to comment on Pre-Submission Draft Local Plan

Reading Borough Local Plan – chance to comment on Pre-Submission Draft Local Plan

Reading Borough Council is now consulting on the Pre-Submission Draft Local Plan until 26th January 2018.

We are in the process of producing a new Local Plan to replace existing development plan documents, and to plan for development in Reading up to 2036. Once adopted, the Local Plan will be the main document that informs how planning applications are determined and covers a wide variety of strategic matters, policies and specific sites for development.

We are seeking comments over the next eight weeks during a period of public consultation. The full Pre-Submission Draft Local Plan is on the Council's website at: <http://www.reading.gov.uk/newlocalplan> and copies can also be viewed at the Civic Offices, Bridge Street, Reading, RG1 2LU (between 9 am and 5 pm on weekdays) and in all Council libraries (during normal opening hours). Supporting documents, such as a Pre-Submission Draft Proposals Map, Sustainability Appraisal and Infrastructure Delivery Plan are also available on the Council's website and are available for your comments. Guidance on how to make representations, which includes a representations form which can be used if you wish, is attached.

We welcome any comments that you have. Please provide written responses to the consultation by 5 p.m. on Friday 26th January 2018. Responses should be sent to: planningpolicy@reading.gov.uk or Planning Policy Team, Reading Borough Council, Civic Offices, Bridge Street, RG1 2LU.

You may also wish to attend one of our drop-in events to talk about the Local Plan to a planning officer in more detail. There is no need to let us know if you wish to attend beforehand. These will be held at the Civic Offices, Bridge Street, RG1 2LU in main reception on Wednesday 6th December from 1:00 to 6:00 p.m. and Tuesday 12th December from 2:00 to 7:00 p.m.

We intend to submit the plan to the Secretary of State in February or March 2018, taking your responses to this consultation into account. A public examination will take place thereafter with adoption expected in late 2018 or early 2019.

If you would like to be removed from our consultation lists, please let us know. We look forward to receiving your comments.

Regards,

Planning Policy Team
Planning Section | Directorate of Environment and Neighbourhood Services

Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

0118 937 3337

Email: planningpolicy@reading.gov.uk

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From: Carr Richard <RichardCarr@tfl.gov.uk>
Sent: 13 June 2017 16:17
To: Planning Policy
Cc: 'Jorn Peters'; Wallace Andrew (London Rail); 'Julie Davis'; Orlik Will (Crossrail); Ranaweera Rohan; Jowsey David; Fairweather Gareth; PropertyConsultation
Subject: Reading Borough Draft Local Plan consultation - Tfl comments

Thank you for consulting Transport for London (TfL). Below I provide some brief TfL officer level comments on the draft Local Plan including comments from colleagues in Crossrail Ltd. These comments have also been included in a combined response which will be sent by GLA

Crossrail services (but not Crossrail Ltd or the Crossrail project/scheme) are now referred to as the Elizabeth Line and this wording should be reflected in the Local Plan e.g. in 1.26, 3.2.2, 4.5.10, 5.4.2. The Elizabeth Line could also be added to the glossary

TfL welcomes the reference to the Crossrail Safeguarding Direction in 4.5.10. It has not been possible to verify the accuracy of the safeguarding limits shown on the proposals map but the intention to consult Crossrail Ltd is welcomed. From 2019 when Elizabeth Line services are fully operational, consultation regarding any development proposals within the safeguarded area or any other applications likely to affect the operation of Elizabeth Line services should be sent to TfL Planning. Crossrail Ltd only exists to deliver the project and Elizabeth Line operations and any remaining assets that are not transferred to other authorities will be the responsibility of TfL

Best wishes

Richard Carr | Principal Planner (Borough Planning)
TfL Planning, Transport for London

E: richardcarr@tfl.gov.uk

A: 10th Floor, Windsor House, 42-50 Victoria Street, London SW1H 0TL

I work part time and so there may be a short delay in responding to emails

For more information regarding the TfL Borough Planning team, including TfL's *Transport Assessment Best Practice Guidance*, and pre-application advice please visit <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>

TREADWELL, W.

From: Bill treadwell
Sent: 23 January 2018 23:22
To: Planning Policy
Subject: Proposed Mapledurham Playing Fields development.

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

Dear Sir/Madam,

With reference to the draft Local Plan Section EN7N Item EN7Nn.

I am very much against the proposed development of Mapledurham Playing Fields to build a school and would like to ask the following questions.

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
 - a. Traffic movements
 - b. Air pollution
 - c. Noise pollution
 - d. Visual dominance and overbearing on the area of the site where they propose to build
 - e. Privacy and overlooking
 - f. Out of character with local residential properties
 - g. Light pollution
 - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
 - i. Hours of operation
 - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields.

Yours faithfully,

W.Treadwell

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UNITE STUDENTS



140 London Wall, London EC2Y 5DN
T +44 (0)20 7280 3300 F +44 (0)20 7583 2231 W rpsgroup.com

E-mail: matthew.roe@rpsgroup.com
Date: 26th January 2018

Planning Policy Team
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Dear Sir/Madam,

READING BOROUGH COUNCIL PRE-SUBMISSION DRAFT LOCAL PLAN REPRESENTATIONS ON BEHALF OF UNITE STUDENTS

We write on behalf of our client, Unite Students, to submit representations to the consultation on Reading Borough Council's Pre-Submission Draft Local Plan. Unite Students is the UK's leading manager and developer of purpose built student accommodation (PBSA), providing homes for around 50,000 students in more than 140 purpose built properties across 28 of the UK's strongest university towns and cities. The consultation invites comments on the plan proposals covering a wide variety of strategic matters, policies and specific sites for development and outlines how Reading will develop up to 2036.

Background to Representations

Our representation focuses primarily on the policies relating to the supply of housing and in particular student accommodation.

Reading is a popular and well established university town. This is recognised by the SHMA which underpins the draft Local Plan identifies that students form an important part of the housing need. In this respect it is notable that the SHMA identified nearly 1000 households in Reading being formed wholly of students. Furthermore it anticipated a growth in student numbers from 13,135 in 2015 to 16,095 in 2018. It also anticipates that a third of this growth will be from international students who place greatest impact on the housing market. Within this context Unite believe that there is a major role to play for purpose built student accommodation in meeting the housing need.

This is supported by Paragraph 21 of the Government's guidance document, 'Housing and economic development needs assessments 2015' which states local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Student housing provided by private landlords is often a lower-cost form of housing. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Plan makers are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside of university-provided accommodation.

Furthermore, there have been a number of examples where Inspectors have granted consent for student development on sites which have been allocated for residential development. These include 315-349 Mill Road, Cambridge (APP/Q0505/W/15/3035861) where the Inspector found that whilst there has been a rise in the provision of student accommodation, there is no clear indication that the shortage of student rooms reported in the Local Plan have been met and student accommodation is a form of housing which relieves the overall pressure for housing within the Borough. In addition, the Inspector noted that The Planning Practice Guidance enables student accommodation to be included towards the housing requirement, based on the amount of accommodation released to the housing market. Reference is made to data used by Cambridgeshire County Council, indicating a ratio of 3.5 student places to one house released.

Another example includes a student mixed-use scheme at 52 Western Road, Leicester (APP/W2465/W/15/3141406) where the Inspector concluded that the provision of 279 student flats in a residential area would contribute to the Council's housing land supply, meet an identified need and not cause adverse impacts upon neighbouring residents which would outweigh the benefits of the proposal.

Similarly, purpose built student housing at Land at Fish Strand Hill, Falmouth, Cornwall (APP/D0840/W/17/3177902) was allowed at appeal as the Inspector acknowledged the scheme would help to meet a significant need for PBSA which would free up existing housing currently occupied by students, for use by the residential population of Falmouth; secondly, the proposal would assist in the growth and success of the universities themselves; thirdly, it would contribute to meeting the Council's housing land supply and provide both short-term and long-term economic benefits for local people.

Mindful of the above, Unite are concerned that the draft Local Plan is currently unsound in terms of its approach to the delivery of housing and have various recommendations to make on specific policies to address this issue as set out in the following paragraphs.

Policy H1: Provision of Housing

The supporting text of Draft Policy H1: Provision of Housing recognises the pressing need for additional housing in Reading and the surrounding area but does not recognise in any form the important contribution that purpose built student accommodation can make to meeting this demand. We recommend the following amendments to the supporting text of Draft Policy H1: Provision of Housing.

- The supporting text should include that purpose built student accommodation forms an important part of the housing need in Reading and such accommodation can be counted towards meeting the housing need.

Policy H3: Affordable Housing

The draft Local Plan refers to the Affordable Housing Supplementary Planning Document (SPD) (2013) states that the requirement to contribute to affordable housing provision will not be applied to student accommodation unless this is being developed on an allocated housing site or a on a site where residential development would have been anticipated. It goes on to state that the following types of residential development will be exempt from the requirement to provide affordable housing:

- Replacement of a single dwelling with another single dwelling; and
- Conversion of a dwelling to self-contained flats where there is no new floorspace.

We believe that the development of PBSA will in turn free up more family sized homes and thus have a positive benefit on housing supply and affordability. We recommend the following amendments to the supporting text of Draft Policy H3: Affordable Housing

- Student Housing should be added to the bulleted list of residential developments that are exempt from the requirement to provide affordable housing.

Policy H5: Standards for New Housing

The supporting text of Draft Policy H5: Standard for New Housing sets out the standards for ne build housing. We recommend the following amendments to the supporting text of Draft Policy H5: Standard for New Housing.

- The text should include the clarification that these standards do not apply for student accommodation.

Policy H12: Student Accommodation

Draft Local Plan Policy H12 Student Accommodation details that new student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation. The policy states there will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites.

The supporting text for Policy H12 acknowledges the many benefits of the growing student population in Reading and recognises the need for new student accommodation. However, it also states that this need should mainly be met on campus or through reconfiguration and redevelopment of existing halls of residence. It goes on to state that provision of new student accommodation needs to be balanced against other types of housing.

Appendix 1 of the draft Local Plan recognises that student accommodation can free up existing housing and sets out the way the different types of accommodation are converted into dwelling equivalents in the Housing Trajectory. Student accommodation comprising bedroom clusters and shared kitchen and living facilities are considered to be equivalent to a single family dwelling as is a self-contained studio. Where accommodation is in the form of study bedrooms and some shared facilities, it is assumed that four bedrooms equates to one dwelling.

The future supply of family sized dwellings will also be delayed through the under supply of PBSA. This is due to family homes being converted to Houses of Multiple Occupation (HMO) to accommodate a small number of students rather than a family. This in turn increases housing demands in the area and also impacts on the affordability of family sized homes. The draft Local Plan states that the priority needs are currently for housing with two or more bedrooms that can house families.

It should be recognised that many sites outside of the established student locations in Reading are highly sustainable, particularly in terms of access to goods and services and public transport connections. The ability of these sites to deliver student housing must be looked at on a site by site basis as it is possible that some sites will be more appropriate for PBSA than for family sized dwellings.

The Local Plan recognises the many benefits the student population brings to the area; however, confining new PBSA to the established student locations will prevent these benefits from being spread out across the city. The concept of inclusive communities is set out in the vision of the draft Local Plan but it is unlikely that such communities can develop if students are essentially segregated from the rest of the population.

This policy is highly restricted geographically for no sound planning reason and given the reasons explained above, should be amended as follows:

- The Policy should read, "*New student accommodation will be provided on or adjacent to existing further or higher education campuses, other sustainable locations, or as an extension or reconfiguration of existing student accommodation*".
- The next sentence, "*There will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites*" should be deleted.

Policy CR11: Station River/Major Opportunity Area

Draft Local Plan Policy CR11 specifies the characteristics of development in the Station/River Major Opportunity Area. We recommend the following amendments to the supporting text of Draft Policy CR11.

- The text should include, "given the positive contribution of student accommodation to housing need, any references on the site specific allocations to residential can also be interchanged with student accommodation."

Policy CR12: West Side Major Opportunity Area

Draft Local Plan Policy CR12 specifies the characteristics of development in the West Side Major Opportunity Area. We recommend the following amendments to the supporting text of Draft Policy CR12.

- The text should include, “given the positive contribution of student accommodation to housing need, any references on the site specific allocations to residential can also be interchanged with student accommodation.”

Policy CR13: East Side Major Opportunity Area

Draft Local Plan Policy CR13: specifies the characteristics of development in the East Side Major Opportunity Area. We recommend the following amendments to the supporting text of Draft Policy CR13.

- The text should include, “given the positive contribution of student accommodation to housing need, any references on the site specific allocations to residential can also be interchanged with student accommodation.”

Policy CR14: Other Sites for Development in Central Reading

Draft Local Plan Policy CR14 specifies the characteristics of development for other development sites in Central Reading. We recommend the following amendments to the supporting text of Draft Policy CR14.

- The text should include, “given the positive contribution of student accommodation to housing need, any references on the site specific allocations to residential can also be interchanged with student accommodation.”

To summarise, we support the Council’s recognition to address the anticipated growth of the student population in Reading through the provision of purpose built student accommodation. We also are in agreement that this provision would help to alleviate the pressure on other housing sectors such as private rented, and in particular HMOs thus ensuring sufficient provision of family sized homes. We do not agree with the Council’s limitation on purpose built student accommodation outside of the established student locations and believe this should be removed and replaced by supportive policies.

Unite are generally in support of the plan and its efforts to address future the growth of Reading’s student population and the demand for student accommodation. However, we believe that the limitations on the provision of purpose built student accommodation outside of the established student locations will stifle the Council’s attempt to address the housing need and ensure sufficient provision of family sized homes.

Please acknowledge receipt of our representations to the Pre-Submission Draft Local Plan (November 2017). We look forward to discussing matters with you further in the future.

Yours faithfully,

MATTHEW ROE
Director

UNIVERSITY OF READING

Reading Borough Council
Pre-Submission Draft Local Plan
November 2017
Representations Form



Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	Mr
First Name	Nigel	Jonathan
Last Name	Frankland	Locke
Job Title <i>(if applicable)</i>		Planning Associate
Organisation <i>(if applicable)</i>	University of Reading	Barton Willmore
Address 1	Estates Management	The Blade
Address 2	Facilities Management Directorate	Abbey Square
Address 3	PO Box 235	
Town	Reading	Reading
Post Code	RG6 6BW	RG1 3BE
Telephone		01189430064
E-mail		Jonathan.locke@bartonwillmore.co.uk

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Sustainability Appraisal and Policies; CC3, CC4, CC6, CC7, CC8, CC9, EN11, EN14, EN17, H1, H3, H5, H12, OU1, CA1a, ER1c, ER1e, ER2,

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

On behalf of the University of Reading (the “University”) we have provided representations on a number of draft Policies and the Sustainability Appraisal. Please refer to the attached report for the University’s representations. In summary, the University’s representations are:

Policy CC3:

The University are supportive of principle behind this policy, however, in order that the Policy can be considered fully justified and therefore sound, changes are required. This Policy is currently unsound.

Policy CC4:

The University support this Policy and consider it sound.

Policy CC6:

The University support this Policy and consider it sound, however make further comments which should be considered.

Policy CC7:

The University considers this Policy unsound and recommend amendments.

Policy CC8:

The University supports the inclusion of this Policy but considers it is unclear in places and in order to ensure it is effective and therefore soundness, recommend changes.

Policy CC9:

The University considers elements of this Policy to be unjustified and therefore unsound. Changes are recommended.

Policy EN11:

The University consider this Policy sound.

Policy EN14:

The University consider this Policy would not be fully justified and therefore unsound. Changes are recommended.

Policy EN17:

The University consider this Policy would not be fully justified and therefore unsound. It is proposed this Policy be amended to refer to background noise levels setting the maximum noise levels that proposed noise generating equipment should be permitted to reach.

Policy H1:

The University considers this policy unsound in that it is not positively prepared or consistent with national policy by virtue of not taking all opportunity to accommodate its full OAHN by efficient use of residential development sites and through the Duty to Cooperate.

Policy H2:

The University considers that not all developments would be capable of complying with the requirements of this Policy and therefore does not consider this Policy to be effective. It is considered unsound.

Policy H3:

The University offers advisory comments in relation to this Policy.

Policy H5:

The University considers that this Policy does not have full regard to National Planning Practice Guidance and does not provide evidence to justify (as required) elements of the Policy. This Policy as drafted is therefore considered unsound.

Policy H12:

The University considers this Policy to be overly restrictive, not fully justified and therefore unsound. Recommendations to make the Policy sound are recommended. Comments are also made in relation to the Sustainability Appraisal assessment of this Policy.

Policy OU1:

The University recommends changes to this Policy in order to ensure consistency with other Policies of the Plan and in the interest of soundness.

Policy CA1a:

The University supports this Policy in general terms, however, considers that the indicative capacity of the site should be increased to 16-40 dwellings. The University does however object to wording included within this Policy which states "Development for residential, subject to relocation of the boat club" and consider the restriction dependent of relocation of the boat club for any residential development to take place to not be justified and therefore an unsound inclusion within the Policy.

Policy ER1c:

The University supports the inclusion of this Policy, however, considers that the indicative capacity of the site should be increased to 20 dwellings.

Policy ER1e:

The University supports the inclusion of this Policy, however, consider the indicative capacity for the site is too low. It is proposed that the indicative number of student bed spaces be increased to 800-900.

Policy ER2:

The University supports the inclusion of this Policy but considers the inclusion of the second paragraph in its current form would render it unsound. Changes to make it sound are recommended. Corrections to the Proposals Map are also advised.

The above summarises the University's representations, however, it is important that for a full set of representations, reference is made to the attached report.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please see attached report.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

In order to ensure the new Local Plan is sound in accordance with the requirements of paragraph 182 of the NPPF. Further, the University would like to be involved in order to ensure that the Local Plan, as adopted, is in a form that protects the future interests of the University of Reading, the economic viability of Reading and the surrounding region and social requirements for housing provision and student housing in line with the objectives of the Local Plan.

B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

Reading Borough Draft Local Plan (2013 - 2036)

Regulation 19 Consultation Representations on the Pre-Submission Draft Local Plan
On behalf of the
University of Reading

January 2018

Reading Borough Draft Local Plan (2013 - 2036)

Representations to Regulation 19 Consultation on the Pre-Submission Draft Local Plan

**On behalf of the
University of Reading**

Project Ref:	25914/P2/A5	25914/P2/A5	25914/P2/A5
Status:	Draft	Final Draft	Final
Issue/Rev:	P2	P2a	P2b
Date:	January 2018	January 2018	January 2018
Prepared by:	Jonathan Locke	Jonathan Locke	Jonathan Locke
Checked by:	Nick Paterson-Neild	Nick Paterson-Neild	Nick Paterson-Neild

The Blade
Abbey Square
Reading
RG1 3BE

Tel: 0118 943 0000
Fax: 0118 943 0001
Email: planning@bartonwillmore.co.uk

Ref: 25914/P2b/A5/JL/dw

Date: January 2018

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1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of our client, the University of Reading ("the University") in promotion of land at Reading University Boat Club, Promenade Road, Reading ("the Boat Club") and land to the rear of 8 – 26 Redlands Road, Reading ("Redlands Road") as suitable locations for residential development through the Development Plan process. These representations also seek to promote the University's interests, including the ability to provide sufficient suitable student accommodation and support for the allocation of St Patrick's Hall (draft Policy ER1e).
- 1.2 This representation report will first revisit both the Boat Club site and the Redlands Road site in light of representations made to the previous Regulation 18 consultation and the changes made (or not made) to the Council's proposed Pre-Submission Draft Local Plan (the "Pre-Submission Plan"). Secondly, this report will review amendments included within relevant evidence base documents (where changes have been made).
- 1.3 In summary, the University are supportive of the Pre-Submission Plan and consider it appropriate to include the Boat Club and Redlands Road sites as draft allocations. Our comments therefore are principally intended to assist the Council in meeting its objectives to provide housing against the identified Objectively Assessed Housing Need ("OAHN") and in the interest of soundness as stated within paragraph 182 of the National Planning Policy Framework (the "NPPF"). In particular, in order to be sound, the Pre-Submission Plan must be positively prepared, justified, effective and consistent with national policy.
- 1.4 We do however have concerns regarding the Policy which relates to student housing provision. Our reasoning will be detailed later in these representations.

2.0 SITE HISTORY AND DESCRIPTIONS

- 2.1 Both the Boat Club and Redlands Road sites have been promoted in response to previous consultations, including the previous Regulation 18 consultation in June 2017.
- 2.2 Within the HELAA, the Boat Club site was provided with reference A13 and the Redlands Road site was provided with reference A22.
- 2.3 The University considers it appropriate to reiterate the points made in earlier consultation responses, in particular, the need for the Council to positively prepare the Local Plan (NPPF, paragraph 182) and provide housing land, wherever possible, to meet its OAHN in full, in accordance with the requirements of the NPPF at paragraph 47. As far as this is possible, having regard to the significant constraints within Reading Borough, these representations will assist the Council in meeting its obligations.
- 2.4 The two sites promoted on behalf of the University are described below.

Redlands Road

- 2.5 The Redlands Road site is located to the south east of Reading town centre, within an area categorised as “East Reading”. Redlands Road is located to the rear of numbers 8 – 26 Redlands Road, Reading. The site has previously been promoted to have an indicative capacity of 20 dwellings at 30dph, citing its central, sustainable location for development and availability in the short term.
- 2.6 The site is highly sustainable with access by sustainable modes (walking, cycling and public bus) to a number of services and facilities, including employment, education, retail and leisure. Further accessible services and facilities are located a short journey away in Reading town centre.

The Boat Club

- 2.7 The Boat Club site is located a short distance to the north of Reading town centre, within an area categorised as “Caversham and Emmer Green” with specific allocation policies contained within Section 8 of the Draft Plan.

- 2.8 The site is within close proximity to the River Thames to the south, shares a boundary with Abbotsmead Place to the north and is accessed directly off Promenade Road. The site is occupied by the University's Boat Club with two main buildings centrally positioned within the site. A large number of other services and facilities within Reading town centre are within convenient walking distance.
- 2.9 In terms of flood risk, being adjacent to the River Thames, the southern half of the site is located within Flood Zone 3, an area at highest risk of flooding (1 in 100 or greater annual probability of river flooding) whilst the northern half of the site is located within Flood Zone 2, considered to be at a medium risk of flooding (between 1 in 100 and 1 in 1,000 annual probability of river flooding). The existing buildings on the site and parts of the adjacent 'The Willows' residential development are within Flood Zone 3.
- 2.10 The Boat Club site has previously been promoted in response to the Council's Issues and Options suggesting an indicative capacity of 15 dwellings at 30 dph on the assumption of the retention of the Boat Club on the site and development only to the northern half of the site.

St Patrick's Hall

- 2.11 St Patrick's Hall is an existing area which provides student accommodation a short distance to the west of the University of Reading, within a short 5-minute walk or bicycle ride. It is a highly sustainable location with convenient access to nearby services, facilities and the main University campus.
- 2.12 A planning application referenced 172045 was submitted in November 2017 by UPP Projects Ltd for the redevelopment of the site to accommodate 872 new student bedroom and ancillary services and facilities. This application is currently under consideration but reflects a more accurate capacity for the site.

3.0 THE EVIDENCE BASE

- 3.1 In order for the Draft Plan to be considered sound, it must be positively prepared as required by the NPPF (paragraph 182), and to therefore use the available evidence in seeking to meet the OAHN for the Borough in full (NPPF, paragraph 47).

Sustainability Appraisal of the Draft Local Plan (November 2017)

- 3.2 The Council's Sustainability Appraisal ("the SA") fully appraises both sites. Insofar as the two sites addressed below, the SA remains unchanged from the May 2017 version responded to in our previous representations. Each are summarised again below.

Redlands Road

- 3.3 The SA, using reference number ER1c, appraised three options for delivery, (1) not to allocate, (2) to allocate a residential development of 12 – 18 dwellings, or (3) to allocate a higher density residential development of over 30 dwellings. The Council selected option (2) which it evaluated as bringing the greatest sustainability effects and that all negative effects are expected to be mitigated.

- 3.4 The University supports the conclusion of the SA, however, given the significant housing need and shortfall of planned housing marginally below 1,000 dwellings over the Plan period, we would recommend that the number of dwellings on the site could be higher than 12 – 18 and that 20 dwellings could be delivered subject to a suitable layout and design.

The Boat Club

- 3.5 The SA, using reference number CA1a, appraised four options for the site. Option (1) was to leave the site undeveloped, (2) was to allocate residential development of 16 – 25 dwellings, citing good access to facilities and areas of informal recreation, increased surveillance for dwellings in the Meadows development to the east with the key negative impact being the potential adverse impact on flood risk. Option (3) took the same points as option (2) whilst considering a higher residential density of over 40 dwellings. Option (3) was considered an option that would place residents at a higher risk of flooding. Option (4) would see leisure uses developed on the site.

- 3.6 The Council chose to proceed with Option (2), to allocate 16 – 25 dwellings on the site, restricting development to areas within Flood Zone 2, preventing development within Flood Zone 3, an area at higher risk of flooding.
- 3.7 Whilst the University supports the principle of the SA in its appraisal of the site as a suitable draft allocation, we would recommend that option (3) is given further consideration in light of the significant housing shortfall included within the Draft Plan.
- 3.8 It is considered that a greater proportion of the site can be developed, subject to technical work appraising the ability to mitigate any potential negative impacts on flood risk on neighbouring properties and / or land, and the potential for adverse impact by virtue of flood risk on proposed dwellings.
- 3.9 The University considers that Option (3) should have been given more consideration, where technical solutions could allow a greater proportion of the site to be developed for housing without placing future (or existing) residents at a higher risk of flooding.

Student Accommodation

- 3.10 The University of Reading generates a significant number of qualified, skilled professionals which the Pre-Submission Plan, at paragraph 4.4.95, recognises make a “major contribution to its (*Reading*) economic success” and that “it is important that sufficient accommodation is provided to enable students to live close to where they study”. Therefore, the ability to provide student accommodation is key to ensuring that the University of Reading maintains its reputation and remains a “major focus internationally” (Pre-Submission Plan, paragraph 9.2.5).
- 3.11 The SA considers the Council’s draft Student Accommodation policy (Policy H12) against 20 objectives, listed within Table 2 of the report. Those which the Council consider to be relevant to the student accommodation policy are listed below:

Sustainability Objectives	
4	Minimise the consumption of, and reduce damage to, undeveloped land.
9	Create, enhance and maintain attractive and clean environments including protecting and, where appropriate, enhancing landscape and townscape character.

13	Ensure high quality housing of a type and cost appropriate to the needs of the area.
16	Avoid significant negative effects on groups or individuals with regard to race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex or sexual orientation.
20	Maximise access for all to the necessary education, skills and knowledge to play a full role in society and support the sustainable growth of the local economy.

3.12 The SA uses the following assessment tools against each sustainability objective to reflect the Council’s view on how the policy option would perform against each. These are provided below:

✓✓	Very positive impact on the sustainability objective (significant positive effect)
✓	Positive impact on the sustainability objective
?✓	Tendency to a positive impact on the sustainability objective
0	Neutral impact on the sustainability objective
?*	Tendency to a negative impact on the sustainability objective
*	Negative impact on the sustainability objective
**	Very negative impact on the sustainability objective (significant negative effect)
✓*	Both positive and negative impacts on the sustainability objective
?	The impact of an issue cannot be predicted at this stage.

3.13 The three options assessed by the SA include H12(i): no policy, H12(ii): locate student accommodation throughout the Borough, and H12(iii): focus student accommodation close to the university and on campus if possible. The Council’s assessment will be explored for each option against the relevant objectives.

Objective 4: Minimise the consumption of, and reduce damage to, undeveloped land

3.14 Option (i), to not insert a policy on student accommodation, and option (ii), to locate student accommodation throughout the Borough, were both assessed by the Council to have a tendency to a negative impact on the sustainability objective. The Council concludes that Option (iii), to focus student accommodation “close to the university and on campus if possible” would have a positive impact on the sustainability objective.

- 3.15 The University note that there is a significant difference between Option (ii) and Option (iii). Option (ii) could in theory mean the development of student accommodation anywhere within the Borough, be it undeveloped greenfield sites, or previously developed land. What is important to note is that Option (iii) includes student accommodation “close to the university and on campus if possible”. The University would support this Option as drafted in that “close to the university” indicates locations where students would be able to conveniently access the University campus via sustainable transport modes including walking, cycling and public transport.
- 3.16 Notwithstanding the above comment regarding how Option (iii) should be interpreted, It would appear that the primary objective of SA objective 4 is the efficient use of land. The University would not object to this principle. However, draft Policy H12 (which is addressed in detail later in these representations) appears to incorrectly reflect what has been tested against this objective. Draft Policy H12 requires that new student accommodation will be provided “on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation”. The policy wording has not been tested within the SA, and if it were to correctly reflect what was assessed for Option (iii), should instead reflect the ability for student accommodation to be placed on campus where possible, but where this is not possible in other locations which can sustainably access the main campus (i.e. locations close to the University).

Objective 9: Create, enhance and maintain attractive and clean environments including protecting and, where appropriate, enhancing landscape and townscape character

- 3.17 The Council consider that Option (i) and (ii) would both have a tendency towards a negative impact on this sustainability objective, though the Council’s reasoning is unclear. The reason provided within the SA is that allowing student accommodation “throughout the Borough” would negatively affect townscape character “by failing to provide an appropriate residential mix”. This requires exploration.
- 3.18 Student accommodation may only affect townscape character where there is such density, within any single area, of students to the extent that the mix of the area would be heavily geared towards students, who largely vacate outside term time. This would not be the case in well distributed student accommodation, which would make up a smaller proportion of the residential mix within those areas. The University considers that having a positive impact on this SA objective requires appropriate distribution rather than prevention of student accommodation outside existing campus areas.

- 3.19 The Council's SA also cites that to allow student accommodation throughout the Borough may (Option ii) may cause negative effects. This is in reference to comments within the Pre-Submission Plan at paragraph 4.4.57 where it is stated that the loss of family housing, which is converted to Houses of Multiple Occupation ("HMO"), can erode the character of an area, causing car parking problems and other undesirable characteristics. Paragraph 4.4.58 of the Pre-Submission Plan relates these characteristics, in certain parts of the Borough, to HMOs which accommodate the high student population, leaving some roads dormant outside term time, "failing to achieve a mixed and sustainable community". It continues to state that "in locations with already high numbers of flats or houses in multiple occupation, conversions to single family housing could help create a more mixed and sustainable community.
- 3.20 The University would agree that the high number of students seeking to study at the University can lead to a high demand for student housing. Where dedicated student housing is not available, this can result in the forming and accommodating of market housing as student accommodated HMOs. Dedicated student accommodation, distributed in sustainable locations could help reduce the reliance on students creating HMOs from market housing and reduce the impacts described within paragraph 4.4.58 of the Pre-Submission Plan, thereby improving townscape character. The provision of dedicated student housing could also allow existing market housing to remain available to meet general housing needs rather than be converted to a student HMO, whilst potentially allowing existing HMOs to revert back to general market housing.
- 3.21 However, again, if the Council correctly reflect Option (iii) in the draft wording for Policy H12 then there would not be an issue, in that student accommodation could be located on campus where possible and close to the university in sustainable, appropriately distributed locations (convenient access to the main campus by non-private car modes), through dedicated developments which include the appropriate provision of facilities (rather than the creation of further unofficial HMOs).

Objective 13: Ensure high quality housing of a type and cost appropriate to the needs of the area

- 3.22 The Council consider that Options (i) and (ii) would have a negative impact on this sustainability objective through the development of off campus sites which could have otherwise have been developed for market / affordable housing needs. The Council consider that Option (iii), by locating students on campus or close to the university (i.e. indicating nearby sustainable locations), would have a positive impact on this objective.

- 3.23 The distinction between the impact between Options (ii) and (iii) on the SA objective is unclear in the Council's assessment. It is again considered that the matter here is the efficient use of land. Unfortunately, the Council does not fully consider within the SA assessment that insufficient student accommodation (which could be provided more efficiently in dedicated developments) through not supporting it in sustainable locations, tends to lead students to create / reside in HMOs, occupying housing which could otherwise provide for general market / affordable needs. Thereby, the over constriction of dedicated student housing (which at a higher density make more efficient use of land than market and affordable housing) can potentially have the reverse effect, reducing the availability of market and affordable housing.
- 3.24 The University also points to the importance of maintaining its success, maintaining the important international reputation it holds and its contribution to the local economy and facilitating its growth. To grow and maintain its position, the University requires student accommodation in locations close to (i.e. with sustainable access to) the main campus. It is considered that Option (iii) does this, but that draft Policy H12 requires amendment to include sustainable locations "close to" the main campus.
- 3.25 Whether it is student accommodation or residential development, there is need for both, and the University supports the efficient use of land in meeting recognised needs.

Objective 16: Avoid significant negative effects on groups or individuals with regard to race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex or sexual orientation

- 3.26 The University agrees with the Council's assessment that Option (i), to not support the delivery of student accommodation would discriminate against a predominantly younger age group that wishes to attend the University of Reading to study, but that to provide a Policy through Option (ii) or (iii) would support the achievement of this objective.

Objective 20: Maximise access for all to the necessary education, skills and knowledge to play a full role in society and support the sustainable growth of the local economy

- 3.27 The University agrees with the SA assessment on how Option (i) performs against this objective in that it would not support access to necessary education, skills and knowledge in support of those individuals then contributing to society and the sustainable growth of the economy. However, the University does not see there to be any distinction in the

performance of Options (ii) and (iii). Both options would support the provision of student accommodation and therefore access to education, skills and knowledge providing that such new accommodation is in locations that would facilitate sustainable access to the main University campus.

Student Accommodation – Sustainability Appraisal Summary

- 3.28 The University has some concerns over the Council's SA assessment of draft Policy H12. In particular, it is considered that Option (iii) has been incorrectly represented in the draft Policy wording. The SA option for H12(iii) states the focusing of student accommodation on campus where possible or close to it. The University considers that reference to "close to the University" should include locations where students would be able to access the main campus via sustainable modes of transport (i.e. walking, cycling and public transport). Many of the impacts claimed by the Council in their assessment for student accommodation elsewhere within the Borough are matters of appropriate distribution in order to maintain a healthy mix of housing in other areas. The University recognises the need to provide housing to tackle the Council's identified shortfall in supply, however, also brings to the Council's attention the importance of supporting the University's growth given its importance to the local economy, by enabling the sufficient provision of student accommodation in appropriate sustainable locations. This would enable the University to provide access to student accommodation to its students in response to a growing need, maintaining its attractiveness as a place to study and thereby its important international reputation.
- 3.29 The University, in the interest of ensuring a sound Local Plan against the tests within paragraph 182 of the NPPF, recommend changes to the wording of draft Policy H12 to assist this.

4.0 PRE-SUBMISSION LOCAL PLAN - VISION, OBJECTIVES AND SPATIAL PLAN

- 4.1 In introducing the context for Reading at paragraph 1.2.3 of the Draft Plan, The Council recognises that many skilled businesses in Reading “rely on the high level of skills in the area, and there are also strong relationships with the University of Reading”. The success of the University of Reading is therefore closely linked to the economic success of the Borough.
- 4.2 The importance of the University is further recognised in the Council’s corporate priorities as reflected within paragraph 2.1.7 of the Draft Plan, which states a priority to provide “the best help through education”. The vision builds on this by stating a Vision for Reading being that “it will be a clean, green, healthy, safe and desirable place in which to live, work, study and visit”. The importance of being able to attract and accommodate students is therefore key to that success.
- 4.3 The University supports a number of objectives for the draft Local Plan, in particular:
- For Reading to be an accessible focus for the development of employment, housing, services and facilities, including meeting the needs of residents and those who study in Reading Borough;
 - Make the most efficient use of Reading’s limited land, to ensure that as many new homes as possible are delivered to meet identified needs;
 - Improve the quality of life for those living, working, studying in and visiting the Borough, with good access to education (amongst other services and facilities);
 - To ensure new development and existing areas are accessible and sustainable, including reducing its effects on, and adapting to, climate change.
- 4.4 The spatial strategy for Reading within the Draft Plan at paragraph 3.2.1 further recognises the constrained nature of the Borough, which dictates spatial strategy to an extent. The University considers that this should mean that the Council makes the most efficient use of sites able to accommodate residential development, such as the Boat Club site and Redlands Road, allowing flexibility within the policy wording for higher residential numbers where appropriate (i.e. flood mitigation for the Boat Club site).

- 4.5 The University also supports the statement at paragraph 3.2.11, that in locations which are highly accessible by public transport, as well as walking and cycling, there are opportunities to seek to increase density of development to help to meet needs. Both sites at the Boat Club and Redlands Road sites are in highly sustainable locations with good access to convenient public transport, and the services and facilities within central Reading.
- 4.6 The University therefore support the Vision, Objectives and Spatial Strategy set out in the Draft Plan, and would point to the opportunity to efficiently develop both Redlands Road and the Boat Club site in order to contribute further towards the housing shortfall over the Plan period.

5.0 DETAILED POLICIES

5.1 As stated within the introductory section of these representations, should the proposed submission version of the Draft Plan be submitted to the Secretary of State for Examination in Public (“EiP”) in its current form, it would then be examined against the requirements of paragraph 182 of the NPPF, this would require that the individual policies within, and the Local Plan as a whole, is considered sound, in that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

5.2 In order to assist the Council in preparing and submitting a “sound” Local Plan to the Secretary of State, the University considers there a need to make a number of amendments to draft policies as included within the Draft Plan subject of this consultation. The changes required in order to make the Plan sound are detailed in the following sub-sections.

5.3 Prior to going into each policy in detail, covering matters of soundness, the University would like to express its support for Policy CC1 (Presumption in favour of sustainable development). This policy closely reflects national policy by reflecting positive language to the consideration of development proposals, and taking from the relevant introductory paragraphs from the NPPF which consider the presumption in favour of sustainable development, namely, paragraphs 11 through to 16.

5.4 The University consider the presumption in favour of sustainable development, as set out within the NPPF, to be the backbone upon which all development should be based. The NPPF at paragraph 14 states that the presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision taking. Proposed development should be positioned in the most sustainable locations in support of the local Reading economy and in protection of climate change principles.

POLICY CC3: Adaptation to Climate Change

5.5 The University are fully supportive of the principle of this policy, however, in the interest of ensuring the requirements are fully justified, based on proportionate evidence, changes were proposed. These have not been taken into account within the Draft Plan and as such we consider this Policy unsound, in that all aspects of it are not fully justified and therefore is also not consistent with national policy.

5.6 The issue with draft Policy CC3 is that it is written very definitively without accounting for what would be reasonable, proportionate and appropriate with reference to the NPPF at paragraph 182. Not all measures listed within the policy will be appropriate for every development and viability could influence whether a development could proceed or not. We suggested the below amendments to ensure the requirements of national policy are met;

“All developments will be required to demonstrate ...” and “The following measures shall be incorporated, where achievable, viable, appropriate and reasonable, into new development”.

POLICY CC4: Decentralised Energy

5.7 The University supports sustainable energy and suggested an amendment to this draft Policy to include the need for such measures unless it can be demonstrated that it would not be suitable, feasible or viable.

5.8 The Council have made the suggested changes in line with our recommendation and as such it is now considered sound.

POLICY CC6: Accessibility and the Intensity of Development

5.9 The University considers that sustainable access to facilities, as is available for the promoted sites at Redlands Road and the Boat Club site, is very important in order to ensure compliance with the requirements of the NPPF. The University support the inclusion of this Policy and consider it sound.

5.10 The University would however wish to state agreement with paragraph 4.1.25 within the supporting text to draft Policy CC6, which supports sustainable, accessible locations as primary locations for new development, including, facilitating convenient access to those associated with the University (staff, students and visitors). In terms of student

accommodation (draft Policy H12), the University would support the application of this policy, to focus new student accommodation in sustainable locations with convenient access to public transport (or by foot / bicycle) to services, facilities and the University campus. This would be wholly consistent with national policy.

POLICY CC7: Design and the Public Realm

- 5.11 As previously submitted in representations, the University support good design in order to comply with the requirements of the NPPF at paragraphs 56 to 68, which consider 'good design'. However, the University had recommended that the beginning of paragraph two of the Policy as drafted should include the introductory words "All new development proposals".
- 5.12 Paragraph 2 starts a new sentence and separate requirement of the Policy and as such without this insertion would be unclear, therefore ineffective and unsound when tested against paragraph 182 of the NPPF.

POLICY CC8: Safeguarding Amenity

- 5.13 The University supports the inclusion of Policy CC8. As drafted, the policy is unclear in places, and in order to ensure it is effective and therefore sound, the following changes (which have been suggested before) to the first paragraph are advised:

"Development shall not cause an unacceptable level of impact on the general amenities of existing properties, or create unacceptable living conditions for new residential properties, by virtue of adverse impact in terms of:

- **Loss of privacy;**
- **Levels of daylight;**
- **Overbearance and visual dominance;**
- **Visual amenity;**
- **Noise and vibration;**
- **Light disturbance;**
- **Dust and air pollution;**
- **Odour;**
- **Crime and safety;**
- **Wind, where the proposals involve new development of more than 8 storeys.**

- 5.14 It was also previously recommended that the second paragraph of this policy, which starts "the position of habitable rooms..." is moved into the supporting text to the policy as the wording appears somewhat explanatory and imprecise. It adds little to the effectiveness and soundness of the policy.

POLICY CC9: Securing Infrastructure

- 5.15 The University supports the principle of development funded infrastructure where infrastructure is required in order to make a development acceptable. Previous representations on behalf of the University advised that the first paragraph of draft policy CC9 be replaced with the following:

“Proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions or CIL at the appropriate time. ”

- 5.16 The above suggested change has been partially made by the Council and is welcomed, however, we recommend that CIL is added.

- 5.17 However, in order to make draft Policy CC9 sound, as previously advised, the final paragraph, quoted below, should be removed:

“Developers are required to contribute towards the ongoing local authority costs of monitoring the implementation and payment of planning contributions.”

- 5.18 The above requirements are overly onerous and open ended without basis in national policy to support its inclusion. Therefore, it would not be justified and therefore is unsound.

- 5.19 The University considers draft Policy CC9, as drafted, to be unsound.

POLICY EN11: Waterspaces

- 5.20 The University remains in support of the inclusion of draft Policy EN11 to protect Reading's waterspaces. The University, in former representations, revealed a potential conflict between bullets four and five of the second paragraph of this policy which on the one hand appeared to require the avoiding of development within 10 metres of watercourses, but then in conflict also required that level access be provided to the waterside for those who wish to use it (likely involving some development).

- 5.21 Whilst the suggested changes were not made, the Council have suggested alternative wording which incorporates the words “wherever practical and consistent” regarding level access to and along the waterside, and “wherever practicable and appropriate” regarding the separation distance of 10 metres from the waterside. The University is satisfied that

this draft Policy is now sound in accordance with the requirements of the NPPF at paragraph 182.

POLICY EN14: Trees, Hedges and Woodlands

- 5.22 The University repeats its support for the inclusion of Policy EN14 but would again recommend an improvement to the second paragraph (as previously suggested but not amended) as stated below:

“New development shall make provision, where appropriate and justified, for tree planting within the application site ...”

- 5.23 As drafted, the policy would require **all** new development, regardless of the type of development or the quality of trees in place, to make provision for such trees. This would not be justified or consistent with national policy and would be unsound. The University suggests the Council include the phrasing “where appropriate and justified” to make the draft policy sound and enable the assessment for the requirements of this policy on each sites / proposal’s individual merits.

POLICY EN17: Noise Generating Equipment

- 5.24 Whilst the University supports the protection of general amenities, including from the potential impact generated by noise pollution, there appears to be no justification, as required by paragraph 182 of the NPPF, for noise generated from equipment to be “at least 10dBA below the existing background level”. Background noise by its nature sets the baseline against which noise would become audible and impacts are assessed against that baseline.
- 5.25 The University therefore considers noise impact should be assessed against background noise with background noise setting the maximum level proposed noise generating equipment should be permitted to reach. This draft policy unjustified and unsound as drafted.

POLICY H1: Provision of Housing

- 5.26 The University objects to Draft Policy H1, in that it is not positively prepared or consistent with national policy, and is therefore unsound.

- 5.27 The Council's ageing SHMA (2016), produced by GL Hearn, using methodology that would remain open to challenge, found the OAHN for the Borough to be 699dpa, or 16,077 dwellings over the Plan period (2013 – 2036). Barton Willmore consider that this figure should be even higher as the figure of 699dpa did not include an uplift for affordable housing need. The PPG (paragraph ID2a-029) states how "an increase in the total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes." The methodology for assessing housing need is set out within the PPG (ID 2A 014 – 029).
- 5.28 The University remains of the view that the Plan should increase the housing target beyond 700dpa to help deliver affordable housing.
- 5.29 Notwithstanding the above, and the flaws in the GL Hearn methodology which arrived at 699dpa over the Plan period (16.077 dwellings), the Council have only included within the Draft Plan provision for 671dpa (or 15,433 dwellings). Whilst an improvement on the previous Draft Plan consulted during the summer of 2017, this still represents a shortfall of 644 dwellings (former stated shortfall was 943 dwellings) over the Plan period.
- 5.30 Therefore, the Council have not presented a Draft Plan for consultation that meets the OAHN in full as required by the NPPF, paragraph 47. Further, the Council states that it intends to work with neighbouring Authorities under the Duty to Cooperate in order to ascertain if the dwelling shortfall can be met in adjacent Council areas but has not stated how this will be met within the Housing Market Area (the "HMA"). There is no evidence to suggest that other Council areas within the HMA are able to accommodate Reading Borough's shortfall. Accordingly, the Council should ensure that there is provision for a review of the Local Plan in the event that other authorities within the HMA are unable to address this shortfall.
- 5.31 We remind the Council of the requirements of Paragraph 179 of the NPPF, that;
- "joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework."**
- 5.32 Whilst provision within the NPPF allows for a local planning authority to not provide for its OAHN in full where valid constraints exist preventing it meeting that identified need, we consider that existing sites included as allocations would have the capability to contribute a greater number of dwellings towards the Borough's OAHN. This should be

explored further prior to the Council seeking assistance from neighbouring Councils under the Duty to Cooperate.

- 5.33 The University recognises the Council's desire to accommodate as much of the OAHN within the Borough, however, would advise the Council that in order to do so, it must make full efficient use of all residential allocations. This would include allowing flexibility within allocation policy wording, such as that for the Boat Club and Redlands Road sites, to maximise residential development potential. For example, the Boat Club site may accommodate a greater number subject to higher densities and the use of flood mitigation measures.
- 5.34 We recommend that the Council consider amendments to the allocation specific policies which will be covered later in this representation and produce an updated SHMA to account fully for affordable housing need. This would be in line with the PPG (paragraph ID2a-029) which states how "an increase in the total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes".
- 5.35 Without the Council taking all opportunity to accommodate its full OAHN by efficient use of residential development sites and through the Duty to Cooperate, draft Policy H1 would conflict with the requirements of paragraph 179 of the NPPF, would not be positively prepared and would therefore be unsound.

Policy H2: Density and Mix

- 5.36 The University does not consider this policy to be effective (and would therefore be unsound) as not all residential developments would be able to comply. For example, residential flat schemes or student accommodation developments exceeding ten units would not be able to provide self or custom-build plots by their nature.
- 5.37 The University agrees with the general principles of what the Council is seeking to achieve with regard to self or custom build plots, however, the requirement should be applied on a case by case basis, where feasible and appropriate. In its current form, this policy would be unsound in terms of the NPPF at paragraph 182.

POLICY H3: Affordable Housing

- 5.38 The University maintains the support in principle for draft Policy H3 concerning affordable housing, as stated in former representations. The University does however wish to

reiterate that there remains no mention of Starter Homes. The Housing White Paper (2017), whilst not imposing a statutory requirement, encourages local planning authorities to include Starter Homes within affordable housing requirements.

POLICY H5: Standards for New Housing

5.39 The University wish to place on record its comments with regard to draft Policy H5 (formerly referenced H4 in the previous draft version of the emerging Local Plan).

5.40 Paragraph 002 (Reference ID:56-002-20160519) of Planning Practice Guidance (the "PPG") states that:

"Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans."

5.41 Therefore the Council would only be justified in applying additional standards with respect of access, water and space standards with full justification. Each section of the Policy will be referred to in turn below.

Space Standards (Policy H5 a.)

5.42 The PPG at paragraph 020 (Reference ID: 56-020-20150327) sets out the justifications that local planning authorities should account for when considering including internal space standards. These are evidence with regard to need (to fully assess the impacts on adopting space standards), viability (considered as part of the Plan's viability assessment and impacts on affordability) and timing (consideration of a reasonable transitional period following adoption to allow developers to factor in costs).

5.43 When reviewed against the above PPG requirements for the inclusion of internal space standards, it is evident that the Council have not based the inclusion of such a requirement on sufficient evidence.

Water standards (Policy H5 b.)

- 5.44 The PPG at paragraph 015 (Reference ID: 56-015-20150327) provides the requirements against which the inclusion of a water efficiency standard must be justified. This includes existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement.
- 5.45 The Council's evidence for the inclusion of a water efficiency standard within the Policy cites climate change, that the Thames Water area is classed as a 'water stressed area' by the Environment Agency, and that the Thames River Basin Management Plan stresses the importance of demand management in the area. The supporting text to the Pre-Submission Plan at paragraph 4.4.43 states that the tighter standard within Building Regulations is 110 litres per person per day.
- 5.46 There is no evidence however that the Council have considered the potential impact on viability and housing supply from such requirements. Therefore, the inclusion of water standards would not comply with PPG guidance.

Zero Carbon Homes and Building Emissions (Policy H5 c. and d.)

- 5.47 Whilst the University is supportive of improved building efficiency, the inclusion of these standards are not supported by the PPG. Matters of energy efficiency would be a matter solely for Building Regulations and there is no evidence as to why there is a need, or indeed regulation basis, supporting the inclusion of emission standards within the emerging Local Plan.
- 5.48 Therefore, in order to be sound, parts c. and d. of Policy H5 should be removed.

Accessibility (Policy H5 e. and f.)

- 5.49 The need to include access standards within the emerging Local Plan should follow the guidance, and requirement for evidence, as outlined within Paragraph 007 (Reference ID:56-007-20150327) of the PPG. This clearly sets out that such need should be based upon the likely future need for housing older / disabled people, the size, location, type and quality of dwellings needed, accessibility and adaptability of existing housing stock, how needs vary across tenures and the overall impact on viability.

- 5.50 The Council's evidence appears to amount solely to the SHMA projection for an ageing population, but with no evidenced justification why there would be a need for "all new build housing" to be built in line with Building Regulations (2013) M4(2) or M4(3). In the absence of any evidence to the contrary, it is also evident that the Council has not considered the overall impact on viability as guided by the PPG. Without such evidence, e. and f. of this draft policy should be removed.
- 5.51 The University considers this policy would not be justified in its current form, with a lack of evidence on the PPG guided optional elements (water, access and space standards), in addition to non-PPG supported inclusion of energy efficiency standards and is therefore unsound. It is our recommendation that draft Policy H5 is deleted.

POLICY H12: Student Accommodation

- 5.52 The Council recognises within the supporting text to this draft policy the benefits that the student population brings to the Borough, in particular, the supporting of services and facilities, with many of the qualified people from the University, remaining in the Borough following graduation and making a "major contribution to its economic success" (paragraph 4.4.95 of the Draft Plan). The Council further recognises, within the same paragraph that "it is important that sufficient accommodation is provided to enable students to live close to where they study".
- 5.53 The Council refer to the SHMA (2016) that anticipated a growth in student numbers at the University from 13,135 in 2015, to 16,095 in 2016. The University is ambitious in its future growth, seeking to complete with other leading institutions in the competition for talented students, who would benefit the University's development but also the wider economy. Data from the University suggests there is already an unmet demand with waiting lists over the last 4 years exceeding 700 students. Student numbers for the academic year September 2017 to August 2018 were 15,026, with numbers for the next three academic years predicted to annually rise by a magnitude in the region of 500 – 700 students per annum.
- 5.54 University data demonstrates that 59% of the full-time student population is now aged 20 or below, with younger students more likely to seek official student accommodation. The University is keen to maintain its guarantee to first year students that student accommodation can be offered with associated support during that first year of study. Between 2010/22 to 2015/16 growth from students outside the region (within the UK) grew by 13%, whilst from the EU growth over the same period was 12% and outside the EU growth was 64%. Whilst the decision to leave the European Union may have an effect

- on students originating from within the EU, it would unlikely have significant effect on the greatest area of growth, from students outside the EU.
- 5.55 Without sufficient dedicated student accommodation, this may hinder the University's growth, and in turn the contribution the University and its student population contributes to the local and regional economy.
- 5.56 Further, students that do come to the University but cannot find student accommodation would more likely occupy less dense and efficient market housing or student Houses of Multiple Occupation ("HMO"), which could have otherwise contributed to standard market / affordable housing needs. Conversion of housing to HMO accommodation by students unable to find dedicated student housing, as referred by paragraph 4.4.58 of the Pre-Submission Plan, can lead to undesirable effects on a community. By contrast, dedicated student accommodation in sustainable locations would have the ability to use land efficiently and include the required supporting services and facilities, which in turn mitigates undesirable effects that HMO housing would be incapable of resolving.
- 5.57 The University of Reading is a popular student destination, and a major employer within the local Reading economy. In light of the above, there is clearly a current need for additional student accommodation, whilst future predicted trends for the University demonstrate a growing need.
- 5.58 The University therefore holds concern on the current wording of draft Policy H12 which seeks to limit support new student accommodation to locations on or adjacent to existing further of higher education campuses, or as extensions or reconfiguration of existing student accommodation. The emerging policy would cover the Plan period to 2036 and therefore will have a strong influence on development that can be conducted by the University over a considerable length of time.
- 5.59 The University of Reading offers the majority of its students accommodation on its Whiteknights Campus, which is also the hub of University activity. The University therefore does not object to the focus of student accommodation being on or adjacent to existing sites or by extending and reconfiguring or extending existing accommodation, however, the anticipated growth and inability to offer all students accommodation (demonstrated by the aforementioned large waiting lists) demonstrates there is a current undersupply of student accommodation available to the University and therefore the policy should be amended to support the provision of student accommodation in all sustainable locations within the Borough.

- 5.60 The Whiteknights Campus, as recognised by the Council at paragraph 9.3.9 of the Draft Plan, is constrained, located on the site of the 19th Century Whiteknights Park, and including a significant amount of parkland, woodland and lakes. Some of these existing elements have significant wildlife importance. Further, there are a number of listed buildings on site.
- 5.61 The constraints to the University's Whiteknights Campus illustrates the problem with an overly restrictive policy which requires that student development would only be permitted on existing campuses.
- 5.62 The restriction of student accommodation to existing campus locations, as drafted, would not be consistent with national policy nor be justified. It is acknowledged that the Council wish to prevent student accommodation taking up land that could otherwise accommodate market / affordable housing in contribution of its OAHN needs. However, in reality, dedicated student accommodation would satisfy student needs in a far more efficient and controlled manner than those same students relying on HMO accommodation and could in turn free up housing for other housing market needs.
- 5.63 It is the University's strongly held position, that the NPPF support for development in sustainable locations should be carried across to student accommodation provision and that the policy should be reworded to allow student accommodation in other sustainable locations within the Borough. This would be consistent with the Council's proposed allocation of Reading Prison (CR13a) which the Council have identified could be used for "residential or student accommodation" despite not being a current campus location. The proposed wording is provided below:

"New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation, *or in other sustainable locations with convenient access via walking, cycling or public transport modes, to services, facilities and places of study.*

There will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites."

- 5.64 The above suggested wording would enable the University to maintain the flexibility to provide student accommodation in appropriate, sustainable locations without detriment to its future prosperity and growth, and without detriment to the significant contribution to the local economy.

- 5.65 The University would further advise, in order to remain consistent with our advised changes above, that paragraphs 4.4.96 and 4.4.98 are both amended to refer to the need to meet student accommodation need on campus, established student locations or through reconfiguration and redevelopment of existing halls of residence "or other sustainable locations with convenient access via walking, cycling or public transport modes, to services, facilities and places of study".
- 5.66 Without the above changes to draft Policy H12 being made, it would be unsound in relation to the tests required by paragraph 182 of the NPPF in that the restriction of new student accommodation on or adjacent to existing campus locations would not be fully justified.

POLICY OU1: New and existing community facilities

- 5.67 The University supports the principle of this draft policy, in particular the support the policy would provide for additional development associated with higher education and the need for such institutions to be supported by existing or planned student accommodation. The University would add that to enable their growth and maintenance of their enviable position within the national and international market, the ability to provide student accommodation for those wishing to come to study at the University of Reading, is crucial.
- 5.68 It is further supported by the University that the policy as drafted supported higher education development, where there is a clear need, on sites identified for residential or other development. This relates well to the University's case that it is crucial that the draft student accommodation policy (H12) permits development of student accommodation, where there is a need, on sites which are sustainably located for access to the main University campus.
- 5.69 In addition to the above, in line with the University's comments in relation to draft Policy H12 and the required alterations to that policy would be to reflect similar changes to paragraph 4.7.9 of the Pre-Submission Plan. The first sentence should remain consistent with other parts of the Pre-Submission Plan in recognition of not solely the delivery of housing, but also the provision of student accommodation to support the future prosperity of the University, its position within the higher education market and its contribution through its students and research to the local and wider economy.
- 5.70 The University considers that the projected growth of the University requires a corresponding increase in the provision of student accommodation and supports this reference within paragraph 4.7.9 of the Pre-Submission Plan. The final sentence of that paragraph however, to correspond with comments made throughout these

representations, but specifically in relation to draft Policy H12, should be amended to read:

“This should be on existing campuses, existing student accommodation sites, or in other sustainable locations with convenient access on foot, bicycle or public transport, in line with Policy H12”

Strategy for Caversham and Emmer Green

- 5.71 As stated within our previous representations, the University maintains its support to the objective within paragraph 8.2.1 of the Draft Plan to provide an additional crossing of the River Thames, east of Reading.
- 5.72 It is considered that a third Thames Bridge is critical to the future of Reading and must be considered as a fundamental requirement in terms of strategic infrastructure.

Policy CA1: Sites for Development and Change of Use in Caversham and Emmer Green

Policy CA1a – Reading University Boat Club, Thames Promenade

- 5.73 The University supports the inclusion of the Boat Club as a draft allocation within the Draft Plan.
- 5.74 It is however considered that the site can potentially accommodate a housing number greater than 16 – 25 dwellings should use be made of areas of the site within Flood Zone 3. Use of such areas would clearly be subject to an appropriate sequential test, and would need to demonstrate sufficient flood mitigation measures can be implemented.
- 5.75 The NPPF at paragraph 101 states:

“The aim of the Sequential Test is to steer development to areas at the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with lower probability of flooding.”

- 5.76 It is clear by the fact that the Draft Plan has an unmet need of 644 dwellings over the Plan period (based on SHMA derived OAHN which we consider likely to be much higher), that there are no alternative sites appropriate for housing in areas with lower probability of flooding.

5.77 Therefore, there is a case that the Council should consider further sites within areas of flood risk as to whether they are able, with mitigation, to accommodate housing without increasing flood risk on neighbouring property and / or land, or resulting in an unacceptable level of flood risk on the proposed dwellings.

5.78 As stated in previous representations, the University considers that technical solutions are available to develop the Boat Club site (CA1a) to a greater extent and intend to submit hydrological evidence to reinforce the ability to develop within the areas of the site within Flood Zone 3. Therefore, we would advise a degree of flexibility to Policy CA1a in order to allow technical solutions to be found that could allow greater development of the site. We suggest bullet point two of the draft Policy be amended to the following:

“Take account of the risk of flooding, and locate development only in the portion of the site in Flood Zone 2, closest to Abbotsmead Road, unless it is demonstrated that suitable flood risk mitigation options are available to facilitate the development of a greater proportion of the site.”

5.79 With the above amendment, we would recommend that the capacity of the site stated within Policy CA1a be amended to reflect a higher potential of “16 - 40 dwellings”. We consider this ensure the policy is sound and positively prepared as required by paragraph 182 of the NPPF.

5.80 Whilst it was formerly stated that to develop a greater proportion of the site would likely require Reading Boat Club to find an alternative suitable location, this was not a definitive conclusion. A significant proportion of the site could be developed for residential purposes without the relocation of the boat club. The University therefore object to the wording which introduces draft Policy CA1a which states:

“Development for residential, subject to relocation of the boat club”

5.81 It is therefore recommended that in order for the policy wording to be justified (reasonable and proportionate), “subject to relocation of the boat club” from the above draft policy extract, should be removed. Should it remain, the University advise that this draft policy wording would be unsound.

5.82 We had previously advised that if development of the Boat Club site (CA1a) resulted in the need for the redevelopment (or conversion) of the existing Reading Boat Club buildings on the site to the extent the Boat Club could not operate, then the relocation of

the club, could be conditional on finding, and demonstrating, that an alternative location has been found. This could then be required within the policy to be secured by Section 106. Should the Council seek to do this, previously suggested wording could be used:

"any development that would result in the loss of the Boat Club facilities shall not be approved unless an alternative location for the Boat Club be found and secured by legal agreement, or where it can be demonstrated that there is no longer demand for the facility."

5.83 The above measures would ensure, insofar as draft allocation CA1a is concerned, the Council has fulfilled its duty, as stated within the NPPF at paragraph 47 (and 179 in terms of the Duty to Cooperate) to exhaust all reasonable opportunities to accommodate its own OAHN in full. Policy CA1a could then be considered sound in terms of being 'positively prepared' as required by paragraph 182 of the NPPF.

Strategy for East Reading

5.84 The Council consider that East Reading is unlikely to be able to make any significant contribution to meeting significant development needs due to a number of heritage constraints (Conservation Areas and Listed Buildings) and due to the area already being densely developed.

5.85 The Council also view that the University of Reading is a major focus internationally and a key principle (paragraph 9.2.5) is that the University of Reading's Whiteknights Campus will continue to develop to support the economy and function of the town, subject to the constraints of the site. The Council recognise that the University plays a vital role in Reading's economy and that there will continue to be a need for development to support that role at the Whiteknights campus. The Council states that this development will be supported, where it does not result in significant adverse effects (Draft Plan, paragraph 9.2.7).

5.86 It should be noted, that the University consider that, in order for it to maintain its international reputation and prosperity, and therefore the ability for the Council to achieve its strategy for East Reading, there is a need for the aforementioned changes to draft Policy H12 to enable the University to propose development of student accommodation, where appropriate, in other sustainable locations within the Borough.

Policy ER1: Sites for Development in East Reading

ER1c – Land Rear of 8-26 Redlands Road

- 5.87 The University support the inclusion of the Redlands Road site, referenced under draft Policy ER1c.
- 5.88 It is considered that given the shortfall in housing within the Borough, that it is highly important that sites such as this are brought forward and opportunities for development maximised.
- 5.89 Whilst the University supports the inclusion of the Redlands Road site as a draft allocation, with the significant housing shortfall (644 dwellings) over the Plan period and the ability of this site to potentially accommodate a greater number, it is recommended that the Council amend the indicative capacity of the site up to 20 dwellings.
- 5.90 As stated previously but not picked up by the Council's latest draft wording for Policy ER1c, the University wish to have the flexibility to utilise the site for educational purposes.

ER1e – St Patrick's Hall, Northcourt Avenue

- 5.91 The University supports the inclusion of St Patrick's Hall as a draft allocation. The provision of approximately 450 – 500 bed spaces will make an important contribution to student accommodation capacity in a location where students would have convenient, sustainable access to services, facilities and the main University campus. The provision of such student accommodation will support the University's growth and future prosperity; in turn this will contribute towards the health of the local and wider economy.
- 5.92 A planning application has been submitted in November 2017 by UPP Projects Ltd (reference 172045) for the redevelopment of the St Patrick's Hall site, including provision for 872 new student bedrooms. This reflects a scheme which has followed pre-application discussions and is a resubmission of a previous larger proposal. It is therefore considered that draft Policy ER1e should reflect a far greater indicative capacity for the site in the region of 800 – 900 bed spaces.
- 5.93 The greater number of bed spaces will contribute even further towards the growth objectives for the University.

- 5.94 In summary, the University considers that the allocation of St Patrick's Hall demonstrates the benefit other sustainable locations can make towards the University's need for additional student accommodation.

ER2: Whiteknights Campus, University of Reading

- 5.95 The University supports the Council's direction within Policy ER2 of the Draft Plan in that it seeks to continue the focus of development on at the Whiteknights Campus.
- 5.96 The second paragraph of this policy has been added when compared to current Policy SA6 of the Sites and Detailed Policies Document (2012, revised 2015). Whilst the University support the recognition that the growth of the University facilitating additional students would require new student accommodation. However, the University consider that the wording of this paragraph is overly restrictive and should be amended to reflect the changes recommended to draft Policy H12 as stated within these representations. The suggested change in wording to the second sentence of the second paragraph of draft Policy ER2 is set out below:

"Provision of new student accommodation on the Whiteknights Campus, ~~or~~ as a reconfiguration or extension of nearby dedicated accommodation, or in other sustainable locations with convenient access via walking, cycling or public transport modes, to services, facilities and places of study, will therefore be acceptable subject to other policies in the Plan."

- 5.97 Without the above amendment to this policy, draft Policy ER2 would be unsound, in that reference to student accommodation being restricted solely to existing campus locations or extension to nearby dedicated accommodation would be unjustified, overly restrictive and wouldn't allow other sustainable locations.

- 5.98 Within previous representations on behalf of the University, it was suggested that the third bullet of Policy ER2 be amended to the following, this recommendation is maintained:

"There will be no significant detrimental impact upon the general amenities of neighbouring residential properties."

- 5.99 The University maintains the other comments on the wording of this draft Policy as stated within our former representations.
- 5.100 The University wish repeat comments on the draft Proposals Map and supporting text to draft Policy ER2 where it would affect the Whiteknights Campus, as these do not all appear to have been taken account of by the Council, but are important for soundness.

- 5.101 The Proposals Map includes areas categorised as areas of biodiversity and green network importance. These areas match with areas of deciduous woodland as recorded within the National Forest Inventory 2014.
- 5.102 The University consider the area categorised as important in terms of its biodiversity importance (deciduous woodland) is not fully up-to-date. An area of the categorised area is directly adjacent to the Mackinder halls development at the Whiteknights Campus and therefore includes an area where deciduous woodland habitat of value is not present. This would require a minor reduction in the area considered to be an "area of identified biodiversity interest" on the draft Proposals Map.
- 5.103 It is noted that a further area categorised as an "area of identified biodiversity interest" has been included within the draft Proposals Map which was not previously included within the SDPD. This can be found to the east of the Mackinder halls development and east of the small area discussed above which we recommend is removed. The University holds concern regarding the inclusion of this additional area and without evidence supporting this change would be concerned that it would not be justified and therefore in accordance with the NPPF at paragraph 182.
- 5.104 The University continues to support the inclusion of the Whiteknights Campus as an allocation, allowing the flexibility to provide development as required over the Plan period, to include additional student, staff, teaching and research accommodation, infrastructure and services, and sports and leisure facilities among other uses.

6.0 CONCLUSION

- 6.1 The University of Reading (the "University") are encouraged by and support the inclusion of allocations CA1a, ER1c and ER1e within the Draft Plan.
- 6.2 There remain concerns that the SHMA (2016), has not fully accounted for affordable housing needs and that the OAHN for the Borough may be considerably higher than the 16,077 (699dpa) indicated. On that basis, we consider that an updated SHMA would be necessary to include full provision for an uplift that accounts for affordable housing needs. Notwithstanding this, the Council have thus far been unable to provide sufficient housing land to meet the housing need calculated by GL Hearn's methodology within the SHMA (2016), resulting in a shortfall of 644 dwellings over the Plan period.
- 6.3 It is considered that in considering the above, every effort should be made to maximise the utilisation of allocated sites, including those at the Boat Club (CA1a) and Redlands Road (ER1c).
- 6.4 With regard to the Whiteknights Campus, included at draft Policy ER2 within the Draft Plan, the University supports its inclusion but considers that amendment to it is required in order to make it sound and bring it in line with other changes recommended to other draft policies within the Pre-Submission Plan, particularly Policy H12 (student accommodation).
- 6.5 A number of amendments to detailed policies within the Draft Plan have been put forward in order to enable the emerging Local Plan, at examination, to be considered sound in that it has is positively prepared, justified, effective and consistent with national policy as required by paragraph 182 of the NPPF. Significant to the University's interests, are the changes proposed to Policy H12 to include other sustainably located locations for student accommodation within the Policy. It is considered there is no backing in national policy to prevent student accommodation on alternative non-campus locations, provided such locations are sustainable and comply with other policies of the Plan. Such flexibility is crucial in assisting the University in competing with other University institutions, and to main its high international reputation. This is important in achieving the vision for Reading 2050 as summarised within paragraph 2.1.7 of the Draft Plan.
- 6.6 The University wish to express interest in attending and participating in the forthcoming Examination in Public hearing sessions.

UNIVERSITY OF READING AND U.P.P.



Ref: A103569/BS/RU
Date: 24 January 2018

Planning Policy Team
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

By Post and Email

Dear Sirs,

PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN

Introduction

We write concerning your current consultation on the proposed Pre-Submission Draft Reading Borough Local Plan (November 2017).

As you are aware, we have recently submitted an application on behalf of the University of Reading and University Partnerships Programme (UPP), for the redevelopment of St Patrick's Hall, Northcourt Avenue for 884 new student bedrooms with associated catering and social facilities (ref no. 172045). UPP has worked in partnership with the University since 2001 and now operates all of the University accommodation on campus, taking responsibility for the cleaning, maintenance, refuse and recycling on behalf of the University.

As such, our comments relate to the policy regarding sites for development in East Reading (Policy ER1), part (e) which is specifically in relation to St Patrick's Hall.

Sites for Development in East Reading

Policy ER1 identified site for development in east Reading. Policy ER1 part (e) (St Patrick's Hall, Northcourt Avenue) requires development to intensify the provision of student accommodation on site, with retention of locally-listed Pearson's Court. The site size is noted as being 3.39ha with a net gain of approximately 450-500 bedspaces required. It states that development should:

- Retain the locally-listed building and additional development should enhance its setting;
- Take account of potential archaeological significance;
- Avoid adverse effects on important trees including those protected by TPO;
- Take account of the potential for biodiversity interest, including bats;
- Enhance the green link across the northern boundary of the site; and
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.





It should be acknowledged that the supporting text to the policy states that the capacity of the sites will ultimately depend on various factors that will need to be addressed at application stage, including detailed design and layout. Thus, the proposed 450-500 bedspaces outlined in the policy is purely indicative and as the supporting text correctly identifies, the capacity would need to be addressed at application stage.

The Need for Student Accommodation at St Patrick's Hall

In this regard, we would highlight that the University of Reading is a growing institution with recent increases in full-time student numbers far outstripping those seen at national levels. This is reiterated in the recently submitted Demand and Impact Assessment with application ref no. 172045 which is also appended to this letter for reference. Of particular note is that:

- The University has grown full-time student numbers by 18% over the last five years, increasing the demand for accommodation bedspaces.
- There has been a 59% increase in the number of students aged 20 or under over this period, with University accommodation allowing the institution to offer good levels of pastoral care and eliminate the behavioural impacts of young students in the local community.
- The University has increased non-UK students by 49% over the last five years and there is a need to deliver on campus accommodation to suit their particular needs.
- Private purpose-built accommodation is expensive and does not solve the problem – 98% of Reading's existing on campus accommodation is priced below even the least expensive bedspace at CityBlock, Reading's newest student development.
- Reading has seen a 16% increase in the number of students living in HMOs over the last five years, double the national average increase of 8%.
- Reading Borough Council's own research (HMO Article 4 Review 2015) shows that the growing student population is 'having deleterious impacts on local residential areas'.
- Rising demand has not been met within the city as there has been a reduction in HMO licenses granted between 2012 and 2017. The effect of this is a reduction in lower quartile rental opportunities. This further advocates increased, more affordable accommodation, at the University campuses.

The University of Reading is growing, and it is vital that this growth is matched in terms of the provision of quality student accommodation within easy access of the main campus. The University has had waiting list in excess of 700 bedspaces made up of undergraduates and postgraduates. In 2017, the University also had to enter into nomination agreements with local accommodation providers to provide accommodation for their students.

This undersupply of accommodation is driving the University to provide more accommodation to manage its growth. If not resolved, this deficit will generate a new and challenging demand on the town's private rental sector and negatively impact on the University's ability to attract the best students from the UK and around the world. The redevelopment of St Patrick's Hall is the next logical opportunity to increase the provision of student accommodation in a sustainable location close to the main University campus.

Assumptions Behind Policy ER1 part (e)

With regard to the capacity of the site for student accommodation, the draft policy refers to a site area of 3.39ha and approximately 450-500 bedspaces. The site area of the submitted planning application is slightly larger at 3.6 ha. This accounts for a small difference in the amount of accommodation between the proposed allocation and the submitted application.



In terms of the bedspace numbers, as we understand it, the draft policy did originally intend to propose bedspace numbers in line with the originally submitted application (ref. 161182) that proposed to demolish Pearson's Court, i.e. between 800-900 beds. Once it was established that the Council wished to retain Pearson's Court and the original planning application was withdrawn, it is our understanding that the policy numbers were reduced (as now published) to take out the new build bedspaces lost through the retention of Pearson's Court. What the draft policy didn't recognise is that there are further opportunities to make up the shortfall in accommodation from the withdrawn scheme through the provision of additional new build accommodation elsewhere at the site. As demonstrated by the submission of the current planning application (ref. 172045) it is still possible to achieve between 800-900 bedspaces with the retention of Pearson's Court. The current application demonstrates that higher bedspace numbers can be maintained whilst still meeting the environmental requirements of draft policy ER1 part (e); namely the retention of Pearson's Court, archaeological interests, avoiding undue impact upon TPO trees, taking into account the interests of bats and the green link and ensuring an appropriate water and wastewater strategy. All of these draft policy requirements are appropriately addressed by the submitted application.

Concluding Remarks

It has been demonstrated through the current application (ref. 172045) at St Patrick's Hall that the site can accommodate a net increase of 884 bedspaces, whilst maintaining the environmental requirements of draft Policy ER1 part (e). On this basis, it is requested that the policy is amended to refer to a site area of 3.6 hectares and a net gain of approximately 800-900 bedspaces.

The need for student accommodation has been evidenced by the enclosed demand and impact assessment. It is imperative that the St Patrick's Hall site, a brownfield site where student accommodation has been provided for over 100 years, is redeveloped making efficient use of finite land available in sustainable locations in close proximity to the University campus.

We request that we be kept fully informed of any further changes to the Local Plan and all other future LDF documents produced for consultation. In the meantime, we look forward to your confirmation of receipt of these representations. If you have any queries then please do not hesitate to contact us.

Yours faithfully

Robin Upton
Director - Planning

Encs.





Demand and Impact Assessment of St Patrick's Hall Redevelopment

Prepared on Behalf of:

The University of Reading and UPP Ltd

November 2017



[Disclaimer and confidentiality clause](#)

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Executive Summary

This Demand and Impact Assessment sets out the clear benefits of delivery of the St Patrick's Hall redevelopment proposal to the local community, allowing the University greater control over its student population, and reducing pressures on the housing market by freeing up stock for the local community. The proposals are supported by the Draft Local Plan which states student accommodation "should mainly be met on campus or through reconfiguration and redevelopment of existing halls of residence".¹

Key statistics supporting the proposal are outlined below:

- The University has grown full-time student numbers by 18% over the last five years, increasing the demand for accommodation bed spaces
- There has been a 59% increase in the number of students aged 20 or under over this period, with University accommodation allowing the institution to offer good levels of pastoral care and eliminate the behavioural impacts of young students in the local community
- The University has increased non-UK students by 49% over the last five years and there is a need to deliver on campus accommodation to suit their particular needs
- Private purpose-built accommodation is expensive and does not solve the problem – 98% of the University of Reading's existing accommodation is priced below even the least expensive bed space at CityBlock, Reading's newest student development
- There is no incentive for students to move from the housing market into such expensive accommodation
- Reading has seen a 16% increase in the number of students living in HMOs over the last five years, double the national average increase of 8%
- Reading Borough Council's own research shows that the growing student population is "having deleterious impacts on local residential areas"²

¹ Reading Borough Council Draft Local Plan, May 2017

² Small Houses in Multiple Occupation and the Article 4 Direction Review' – July 2015, Reading Borough Council



1. Introduction

- 1.1. This paper summarises the rationale behind the St. Patrick's Hall redevelopment proposal and assesses the benefits and impacts of developing new accommodation on university owned land.
- 1.2. The key drivers for the redevelopment are;
 - To accommodate the long term increase in student numbers and forecasted growth.
 - To allow the University to continue to offer a first year guarantee to its students to enhance the student experience and provide good levels of pastoral care.
 - To reduce the impact of students on the already stretched local housing market.
 - To replace the outdated facilities on the St Patricks Hall site in line with standards in other Higher Education institutions and student expectations.
 - To improve overall accommodation quality to maintain the attractiveness of the University of Reading and the wider area to a prospective student body.
 - To realign the demand to supply ratio. (The university had waiting lists in excess of 700 students
 - To maintain and enhance the overall student experience and avoid having to place large numbers of students in hotels.
- 1.3. **This paper also explores the dynamic between student demand for accommodation and the private housing market in Reading. There are clear benefits to providing more on campus accommodation both for students and the local community, including improving the student experience, giving the University greater control in managing its student population, and in freeing up houses in the private rental market. This is supported by the Draft Local Plan which states that student accommodation “should mainly be met on campus or through reconfiguration and redevelopment of existing halls of residence” as per the St Patrick’s Hall redevelopment proposal.**

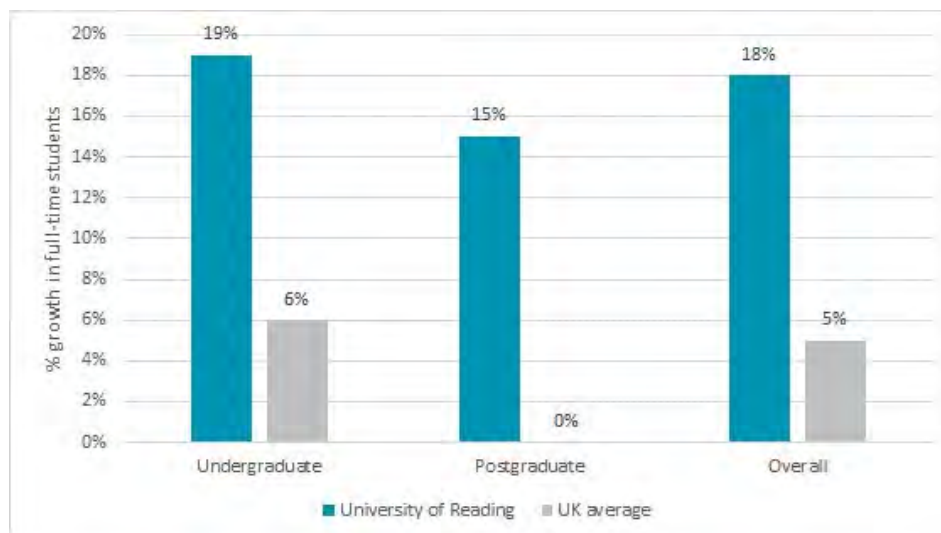


2. Student Demand

The University of Reading is a successful and growing institution which recruits an increasing number of students from outside the region. Purpose-built accommodation development is essential in housing the growing cohort demanding bed spaces and to reduce increasing pressures on the local housing market.

- 2.1. The University of Reading is one of the largest employers in the region and it is estimated that £650m goes into the local economy each year as a direct result of the University³. The Global Reach, Local Impact report also highlights the University's key role in working with the local supply chain, bringing £3.5m of business tourism to the area, and training 1,000 teachers per year for the region's schools. As a top 30 UK institution, the University is home to large numbers of knowledge-intensive graduates, of which the Government believes future economic growth will be delivered through.
- 2.2. The University is perceived in the Higher Education sector as a successful institution which has continued to grow at a time of volatility in the market. The University has grown full-time student numbers by 18% between 2010/11 and 2015/16, far above the national average of 5% over the same period (HESA 2010/11 to 2015/16). Impressively, the University has managed to grow both its undergraduate and postgraduate student population over this period – the former by 19% (vs. 6% national average), and the latter by 15% at a time when no growth was seen in the postgraduate population nationally. This growth can be seen below.

Figure 1: University of Reading full-time student number growth vs. national average 2010/11-2015/16



Source: HESA 2010/11 to 2015/16

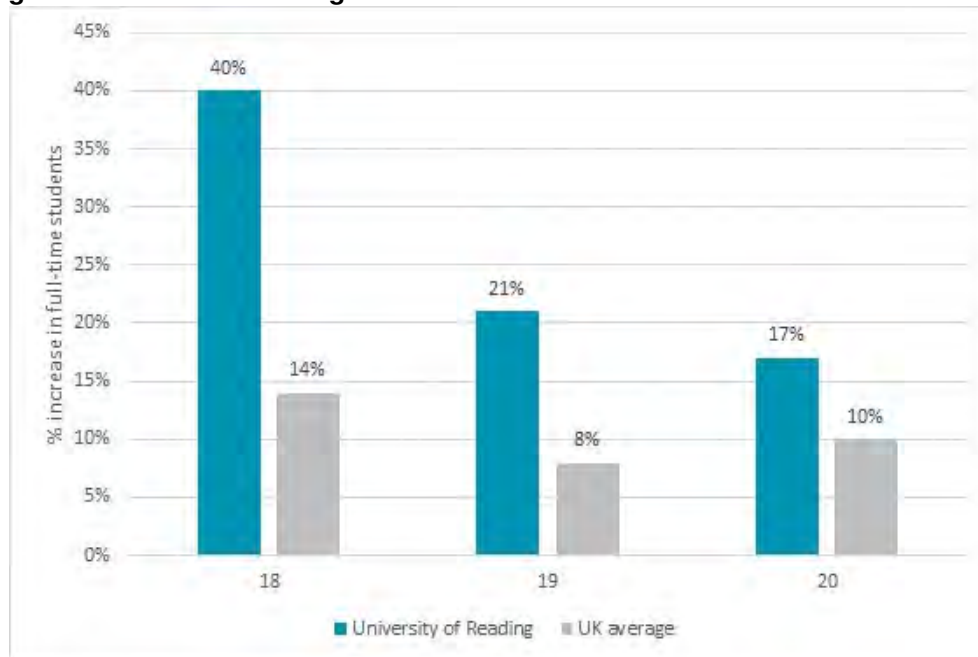
- 2.3. **The University's growth over this period has been characterised by an increase in the young student population. 59% of the full-time student population is now aged 20 or**

³ <https://www.reading.ac.uk/universitypublications/Economicimpact/up-economicimpact.aspx>



below, a figure significantly higher than the 51% national average. Younger students are more likely to demand a bed space in university accommodation, with institution's themselves eager to offer bed spaces which mean they can deliver pastoral care to support good social and learning outcomes. The University's strong recruitment performance means that students of this age are increasing faster than the national average. This is growing the demand for purpose-built student accommodation beds.

Figure 2: University of Reading full-time student numbers aged 20 or below growth vs. national average 2010/11-2015/16



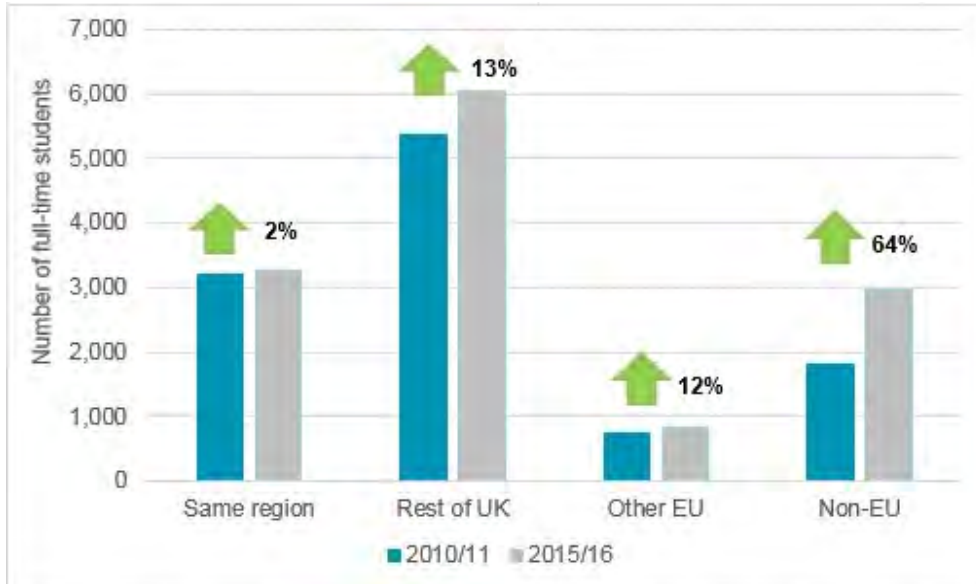
Source: HESA 2010/11 to 2015/16

2.4. The University's success means that its national and international appeal is growing strongly.

Crucially in terms of demand for student accommodation, the University now recruits 29% of its student population from outside the UK, far above the 23% national average. Since 2010/11, the University has increased its non-UK student population by 49%, above the national average of 10% seen over the same period. International students (i.e. non-EU) have grown particularly strongly at 64% (vs. 12% national average over the same period). International students are far more likely to demand purpose-built accommodation, valuing the security, ease and student experience it offers. The University is also recruiting more students from the rest of the UK, with those from within the region only growing by 1%. All of this growth means that the demand for student accommodation bed spaces is growing strongly.



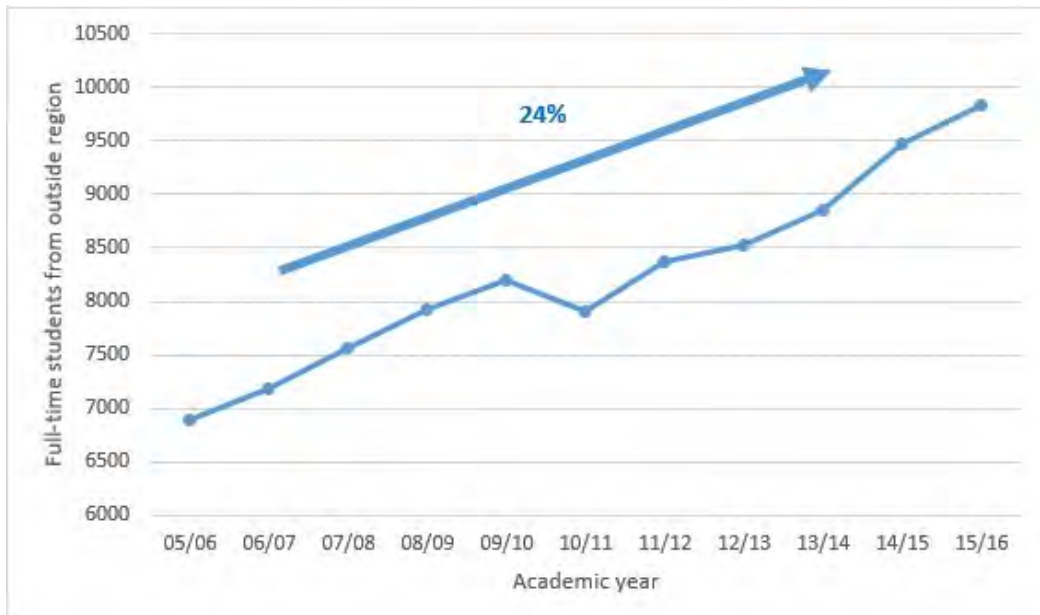
Figure 3: University of Reading growth in students from outside the region 2010/11-2015/16



Source: HESA 2010/11 to 2015/16

- 2.5. The University’s attractiveness to students from outside the region – i.e. those requiring a bed space has grown significantly over the last decade, as can be seen below.

Figure 4: University of Reading growth in students from outside region 2005-2015



Source: HESA 2005/06 to 2015/16

- 2.6. **As can be seen, the University is key to the local economy and its strong performance will be important to the future success of the local economy. However, growth will**



increase the pressure on an already stretched local housing market – something development at St Patrick’s will alleviate.



3. Supply

Background Demand for Accommodation

- 3.1. The University's main campus at Whiteknights offers 4,982 rooms which are all provided through a partnership with UPP (University Partnership Programme).
- 3.2. UPP is the largest on campus provider of purpose-built accommodation in the UK, and took over the operation and management of all of the university accommodation at Reading in 2011. UPP provide a managed solution for the university accommodation with sites staffed during core hours, with security patrols 24/7.
- 3.3. Cushman and Wakefield has used licenced HESA data, along with detailed consultations with the University registry and forecasts, to outline the number of students who are likely to require accommodation. The methodology reviews the full-time student population and then removes students least likely to demand accommodation (i.e. those from the local areas not in term time accommodation and sandwich students who are off-campus on a placement for one year). The result is a demand pool of students who are most likely to require student accommodation. This demand pool, combined with the supply available, produces a supply-demand ratio which can then be benchmarked against other UK towns and cities. For the University of Reading this has been calculated at a demand pool of two students to every bed (2.0:1 ratio). This indicates a need for additional accommodation supply to meet demand, and results in a larger than average proportion of students needing to find accommodation in the private rented sector. Cushman & Wakefield has seen evidence that in previous years some first year undergraduates have deferred their place at Reading or accepted a place at another institution due to the fact they have been unable to secure campus accommodation. Further, the University has been forced to house large numbers of students in hotels on a temporary basis, damaging the student experience.
- 3.4. Currently the private purpose built student accommodation (PBSA) market provides 1,558 rooms in 2017/18 within the Reading area. The map below shows the location of these developments which are generally located toward the town centre.

Figure 5: PBSA accommodation in Reading for the 2017/18 academic year



Source: Cushman & Wakefield Student Accommodation Tracker 2017/18

- 3.5. The table below provides a brief overview of the PBSA blocks and the number of rooms provided within each.

Table 1: Overview of PBSA supply in Reading

Block	Operator	Total Rooms
Loddon House	Fawley Bridge	101
Kings Road		80
Central Studios	Fresh Student Living	141
Crown House	UNITE	40
Kendrick Hall		604
Saxon Court Apartments	Collegiate AC	83
Queen's Court	CRM	375
CityBlock		134
Total		1,558

Source: Cushman & Wakefield Student Accommodation Tracker 2017/18

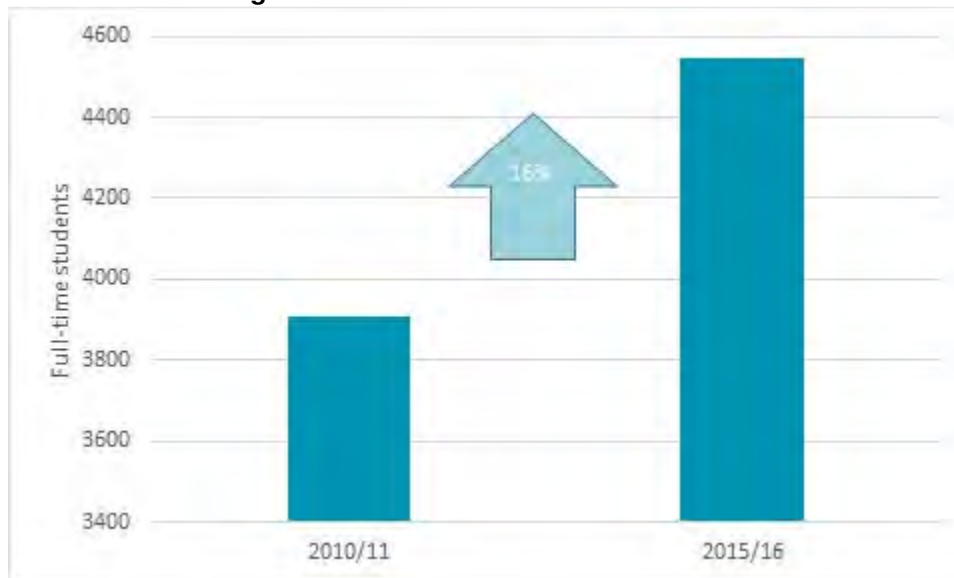
- 3.6. Even with private sector purpose-built and University accommodation, there are still a large number of students who must look to the local private rental market for accommodation.



Planning Pipeline

- 3.7. In national terms, the planning pipeline is relatively small which means that the St Patrick's redevelopment is crucial in raising the capacity of the University to absorb demand. Positively this will also reduce the proportion of students housed in HMOs.
- 3.8. We are aware of circa 300 purpose-built bed spaces currently within the planning system and our review of these proposals and the existing accommodation available suggests that the proposed scheme will do little to increase student choice and affordability. Furthermore, it is our understanding that location is key to the choice of accommodation and that the attractiveness of the campus environment is a key decision making factor for students in where they choose to live.
- 3.9. Even with the private sector and proposed developments, there are a large number of students who must look to the local HMO market for accommodation during their studies. The off campus situation in Reading does not, we believe, provide a great volume nor choice of accommodation now or in the future in comparison with the size of the University and its potential for growth in student numbers.
- 3.10. It is unlikely that inexpensive accommodation off campus will be possible to develop due to the following factors:
 - The rising population of the city as a successful and increasingly populous commuter town for London, raising land prices and leading to smaller packages of land being available over time (raising each room price to make future developments viable)
 - Competition for land from other uses such as housing for the increasing population
 - Construction costs rising, again leading to the inability of a provider being able to offer ultra-cheap accommodation
 - The commercial models of other operators in the UK student accommodation space – indicating that they would not offer accommodation for ultra-low rates as it is not commercially viable, nor necessary to do so.
- 3.11. **This is perhaps best evidenced by the only new development to be delivered in Reading in 2017/18 – CityBlock. Rents at this all studio development start at £184 per week, rising to £243 for the most expensive room. All lease lengths are 51 weeks in length meaning that annual rents are between £9,400 and £12,368. In contrast, 98% of all University-provided accommodation is priced below CityBlock's least expensive annual rent.**
- 3.12. With the University's growth it is unlikely that the housing market will be able to provide an adequate response to this, especially given the pressures that will be coming from many users of HMO accommodation from a wide demographic of economically active people. There is evidence that the University is already exerting a greater than average pressure on the HMO sector. This can be seen below.

Figure 6: Percentage of Reading student body living in HMO accommodation vs. national average 2015/16



Source: HESA 2015/16

- 3.13. **As can be seen from the chart, there has been a 16% increase in the number of full-time students at the University of Reading living in HMO accommodation between 2010/11 and 2015/16. At a national level over the same period, the rate of increase has been only half this level – 8%, as purpose-built stock has been used to alleviate pressures on the housing market nationally.**
- 3.14. As part of its wider accommodation strategy the University is seeking to redevelop part of the existing St Patrick's Halls site to replace some of its oldest accommodation and increase the provision of quality accommodation for its students. This is a positive step to managing its growth and reducing the University's impact on the private rented accommodation within the town and increasing choice for students who wish to live on campus.
- 3.15. The ability to provide a sufficient number of rooms on-campus is positive for a variety of mutually beneficial reasons:
- For the University it enhances the student experience and supports a mixed community of students on-campus. It also provides access to campus living for a greater number of students, in line with students' expectations.
 - It is positive for the town where growth in student numbers can be captured on-campus, freeing up private rented accommodation both in the town and around the campus.
- 3.16. According to the July 2015 *Small Houses in Multiple Occupation and the Article 4 Direction Review* the wards of Katesgrove, Park and Redlands were covered by an Article 4 direction because 'the growing student population was having deleterious impacts on local residential



areas'.⁴ Often this can be due to anti-social behaviour, issues associated with parking, the balance of the local community, the lack of management of the housing and a large reduction in the local population for certain times of the academic year.

- 3.17. Bringing more students on-campus will reduce the impact of student demand for private rented accommodation. In line with the Article 4 direction it also enables the town to maintain and grow a mixed community, an important factor when considering the *'negative impacts that high levels of tenure turn over can have on communities'*⁵

⁴ 'Small Houses in Multiple Occupation and the Article 4 Direction Review' – July 2015, Reading Borough Council

⁵ 'Small Houses in Multiple Occupation and the Article 4 Direction Review' – July 2015, Reading Borough Council



4. Conclusions

University Performance

- 4.1. As outlined in this assessment, the University of Reading is a growing institution, with recent increases in full-time student numbers far outstripping those seen at national levels. Key to the pressure on local housing markets is the composition of the University's student body. As the institution has developed a reputation as a high quality teaching and research institution, it has become more popular as a place of study to both a national and international audience. Consequently, recent years have seen a significant increase in the demand pool for accommodation. As accommodation supply has not been able to keep up with the rate of demand growth, more students have been forced into the private rented sector, with these students taking up houses that could be used by the local community.

Availability of Housing

- 4.2. As previously referred to, it is clear from the supply and demand dynamics, representing a ratio of 2.0:1 students to beds available, that there is a shortfall in suitable accommodation for students. This has resulted in an increased number of students living within the private housing sector in Reading. By doing so this has reduced the availability of accommodation for other population groups at a time when the housing market is under significant pressure.
- 4.3. The significant impact of this is referred to within the Council's Homelessness strategy. *'Households on a low income face some particular challenges accessing private rented accommodation as the cost of privately renting in Reading has increased. Demand for private rented accommodation locally is fuelled not only by the buoyant economy but also fewer households buying property, the student and young professional markets and households moving out of London to seek more affordable accommodation - all competing with those on a lower income'*.⁶
- 4.4. The movement of students out of the private rented sector and into purpose-built University accommodation will support both the Homelessness Strategy and the Borough Councils desire to restrict the proliferation of Houses in Multiple Occupation.
- 4.5. A further consideration is that students are exempt from paying Council Tax. By reducing the number of properties in the private rented sector that are occupied by students and replacing them with Council Tax paying residents, there will be a resultant benefit to the local community.

Controlling Noise and Disruption to the Local Community

- 4.6. Building on-campus means the University has greater control over their student body. It allows the University to retain responsibility for students, mitigating potential issues of antisocial behaviour, building a balanced community as well as maintaining the attractiveness of the university for future generations of students. On campus accommodation also allows the

⁶ Homelessness Strategy 2016-2021 Reading Borough Council



University to provide good levels of pastoral care to its students, alleviating any issues before they become serious. This is especially important as the University has significantly increased its number and proportion of students under 20 years of age over recent years.

- 4.7. The Partnership between the University and UPP enables a high level of management of the accommodation to mitigate any noise and disruption issues. A management plan has been developed as part of the planning submission to demonstrate how the accommodation is currently managed and will be managed during and post the redevelopment of the new accommodation. The management plan has been further developed through consultation with the local community to ensure that the increase of students on the site will be managed effectively to mitigate impact on local residents.

The University taking control of the effects of the growth in students

- 4.8. There has been a precedent at the University of Exeter and the University of York whereby their respective councils have determined that any growth in student numbers should be supported on campus. Exeter City Council published a Supplementary Planning Guidance Note for Development Related to the University of Exeter in June 2007. This document included nine principles, one of which states that it supports the University's intention to expand but seeks the provision of as much purpose built student housing as possible to reduce the impact on the private sector housing market and recommends more intensive use of the University's Duryard Campus.
- 4.9. In York City Council's Preferred Options Local Plan June 2013 it states that '*In accordance with Policy ACHM5: Student Housing, the University of York must address the need for any additional student accommodation which arises because of their future expansion. Provision will be expected to be made on campus in the first instance or otherwise on allocated sites managed by the institution in question or linked to purpose built dedicated private sector accommodation.*'
- 4.10. Reading University has an established residential campus at Northcourt Avenue which can support further development of student residences. On campus accommodation is attractive for students who want to be immersed in both the academic and social experience of living in a halls community. This is evidenced by the chart below which shows the increased numbers of students living in purpose-built stock as opposed to HMO accommodation. The University is therefore keen to ensure that their Accommodation Strategy reflects planned growth and lessens any negative impacts on the local Reading housing market this growth may bring about; whilst meeting the desires of today's students.

Affordability

- 4.11. Affordability is now an increasingly important concern for students, with the 2016 National Student Housing Survey rating price as the second most important reason for choosing accommodation after location. Affordability is especially as concern when nearly nine in every ten beds delivered for the 2017/18 academic year is through the private sector. Cushman & Wakefield's student Accommodation Tracker finds that the average private sector en-suite bed space in 2017/18 is £740 more expensive than the average university-provided bed.



- 4.12. The University is able to control the rents charged to students alongside the ability to provide a mix of unit types on campus. The mix of room types means standard rooms, of a low price bracket, can be provided allowing for a range of price points. This is in response to the University and their students' requirements. Private sector schemes generally only provide higher value room types and thus a lack of University supply forces a number of students into unsuitable, expensive accommodation.
- 4.13. The Student's Union has produced a paper highlighting the need for affordable rent options: 'The Case for More Affordable Accommodation at the University of Reading' by Ben Cooper, Community and Development Officer at Reading University Student Union⁷. The Students' Union's position is supported by the wider national body which is campaigning for at least 25% of all bed spaces to be offered at half the level of the student maintenance loan (c£4,200 per annum).⁸ On campus schemes can provide a more affordable option to students as the cost of land doesn't have to be incorporated into the costings which means that rents can be more affordable for students. Pricing in any development in town would not be able to be as affordable and may not therefore deter students from the PBSA scheme and towards the more price sensitive HMO's property options.
- 4.14. **Allowing this development will enable the university to continue to be an economic driver for the area. It will free up HMOs and other residential locations in the city, allowing for greater levels of graduate retention and the housing of young professionals that will drive economic growth. Development will also allow more balance in local housing stock, helping to balance the local community.**

⁷ http://issuu.com/rusudocs/docs/the_case_for_more_affordable_accomm/2?e=4934705/33539962

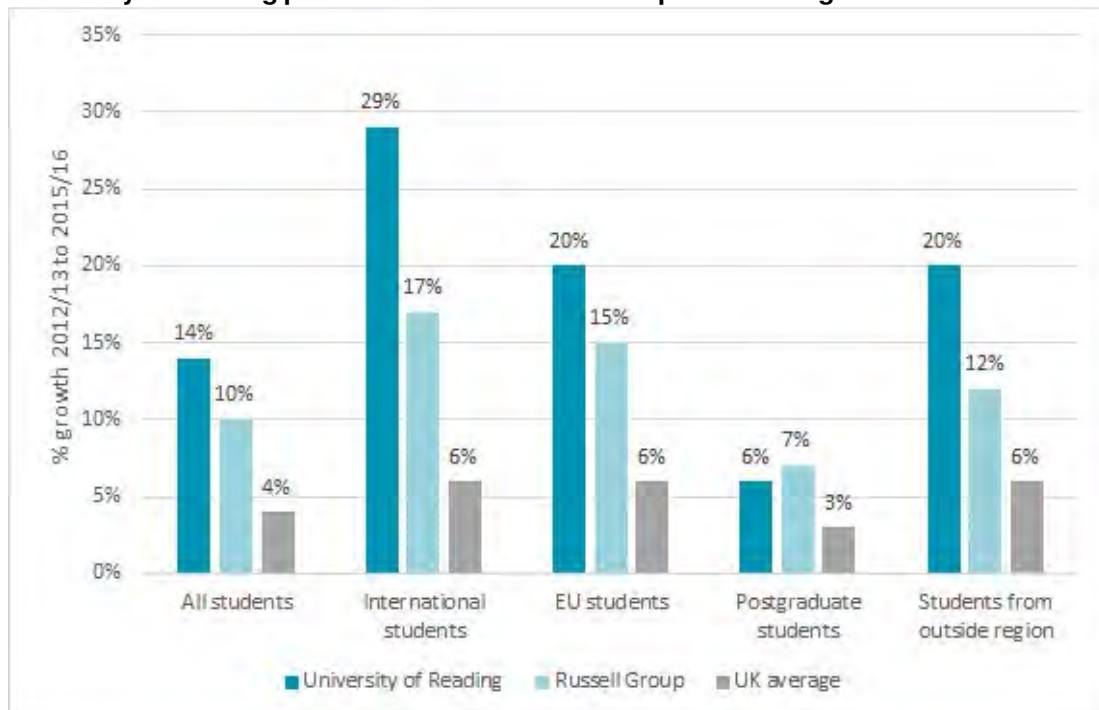
⁸

<https://www.nus.org.uk/PageFiles/2161132/Draft%20Interim%20Housing%20Supplementary%20Guidance%20Consultation%20Response%20from.pdf>

Appendix A

Since changes to the university tuition fee system in 2012, the Higher Education sector has undergone significant change, with a clear gravitation of students towards quality institutions that support quality employment and career outcomes. There is, therefore, a clear division between ‘winners’ and ‘losers’ in the sector, with those able to support future employment succeeding at the expense of those which are less able to do so. It is important to place the University’s success in context and below, we outline University growth in comparison to elite, research-intensive Russell Group universities since changes to the tuition fee system in 2012.

University of Reading performance vs. Russell Group & UK average since 2012



Source: HESA 2010/11 to 2015/16

As can be seen from the chart, the University outperforms elite Russell Group institutions in all but one category and far exceeds the national average growth in every one. The University is recruiting more students from a wider base more quickly than the national average and even the Russell Group as a whole. This is increasing the demand for accommodation bed spaces.

The University of Reading is ranked among the top 32 universities in all three of the main university league tables. The University has remained consistent in the rankings over the past five years, despite intense levels of competition in the Higher Education sector.



University League Table Performance

League Table	2010	2011	2012	2013	2014	2015	2016	2017	2018
The Times	31	35	33	24	35	33	32	31	32
Guardian	41	45	32	25	38	30	25	32	29
Independent	35	40	34	32	37	37	29	27	26

Source: Newspaper university league tables. *The Times 2017 results are not yet published

In the 2016 National Student Survey (NSS) the University scored an overall satisfaction rating of 87%, above the national average of 86%. Recently released data from the Times Higher Education Student Experience Survey 2016 reveals that Reading is ranked 18th in the UK, up from 32nd the previous year.

The total increase in the number of students from outside the region between 2010/11 and 2015/16 is 1,930 – students that, if purpose-built accommodation is not available to them, are forced into the private rented sector, increasing pressures on the housing market. At an average of four students per household, this means 483 additional houses are used that could otherwise be made available to local families. Further, the transient nature of the student population means that a number of students are not in situ during holiday months – damaging small businesses based in local communities.

The University has had a waiting list of accommodation for the last three years which has grown to over 700 students in 2017/18. The institution is now forced to temporary house students in hotel accommodation at the start of term until accommodation can be found within the surrounding local housing stock damaging the student experience and potentially the reputation of Reading.

In its Draft Local Plan, Reading Borough Council acknowledges pressures on the local housing market, noting that “there are high concentrations of flats and conversions and houses in multiple occupation, in part reflecting the very high student population”.

The Draft Plan notes that the need for student accommodation “should mainly be met on campus or through reconfiguration and redevelopment of existing halls of residence” as per the St Patrick’s Hall redevelopment proposal”.

The proposed scheme would deliver improved and additional accommodation on campus to meet growing levels of demand. Given the Borough Council’s policy to consider additional housing needs, it recognises that “there are many sites where development for students prevents a potential housing site being used to help to meet the more pressing needs for general housing”. The proposed St Patrick’s redevelopment would not use a site that could be used for housing and meets the Borough Council’s desire that “development for students should therefore be limited to established student locations”.

There is a need for the University to ‘revitalise’ its accommodation estate to better meet the needs of today’s students, especially given the number of international students the institution



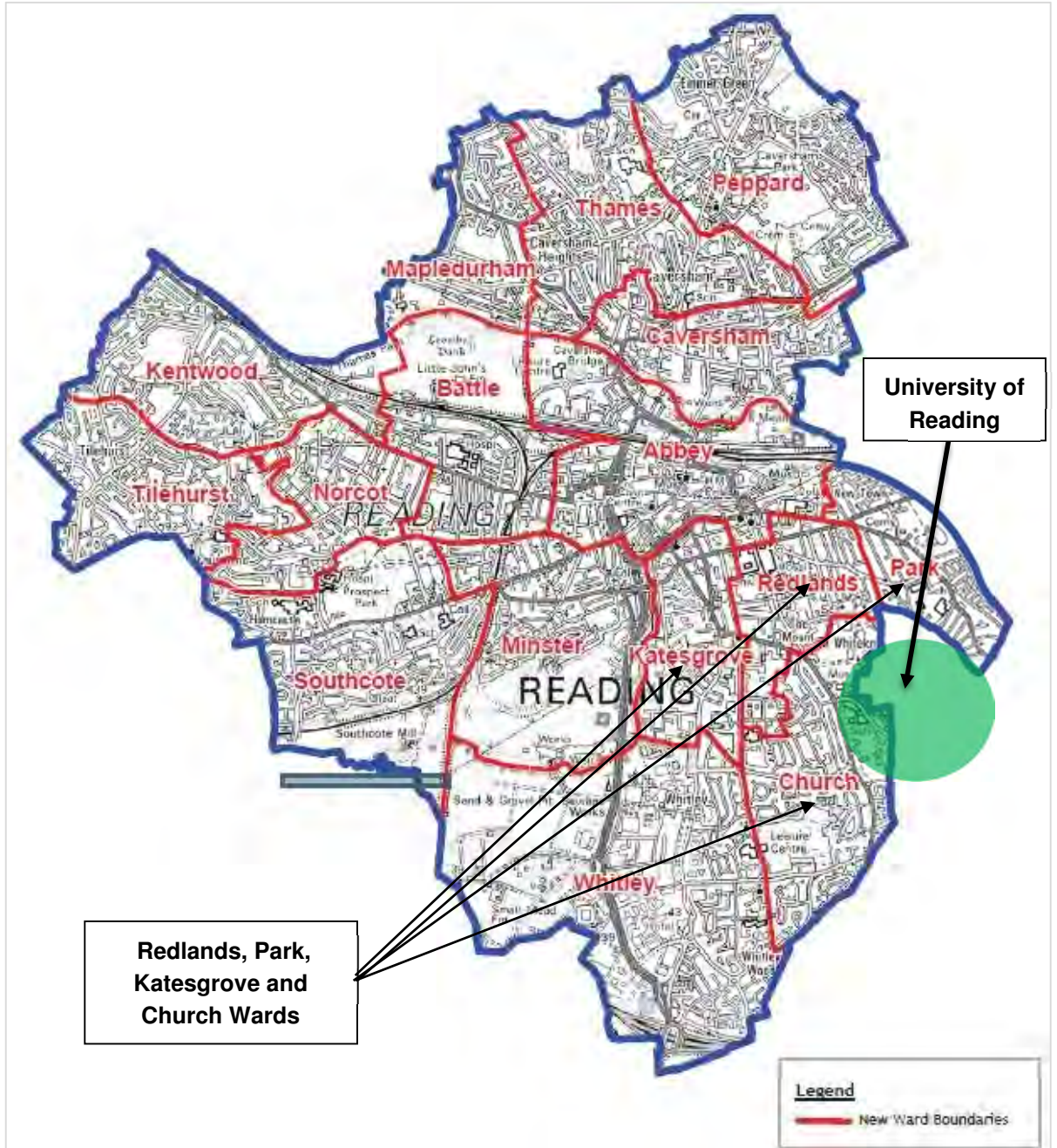
now attracts. The proposal would deliver over 60% of these en-suite rooms in the form of one bathroom per two student provision – increasing quality, but helping to mitigate against any significant increases in overall rents.



Reference Documents

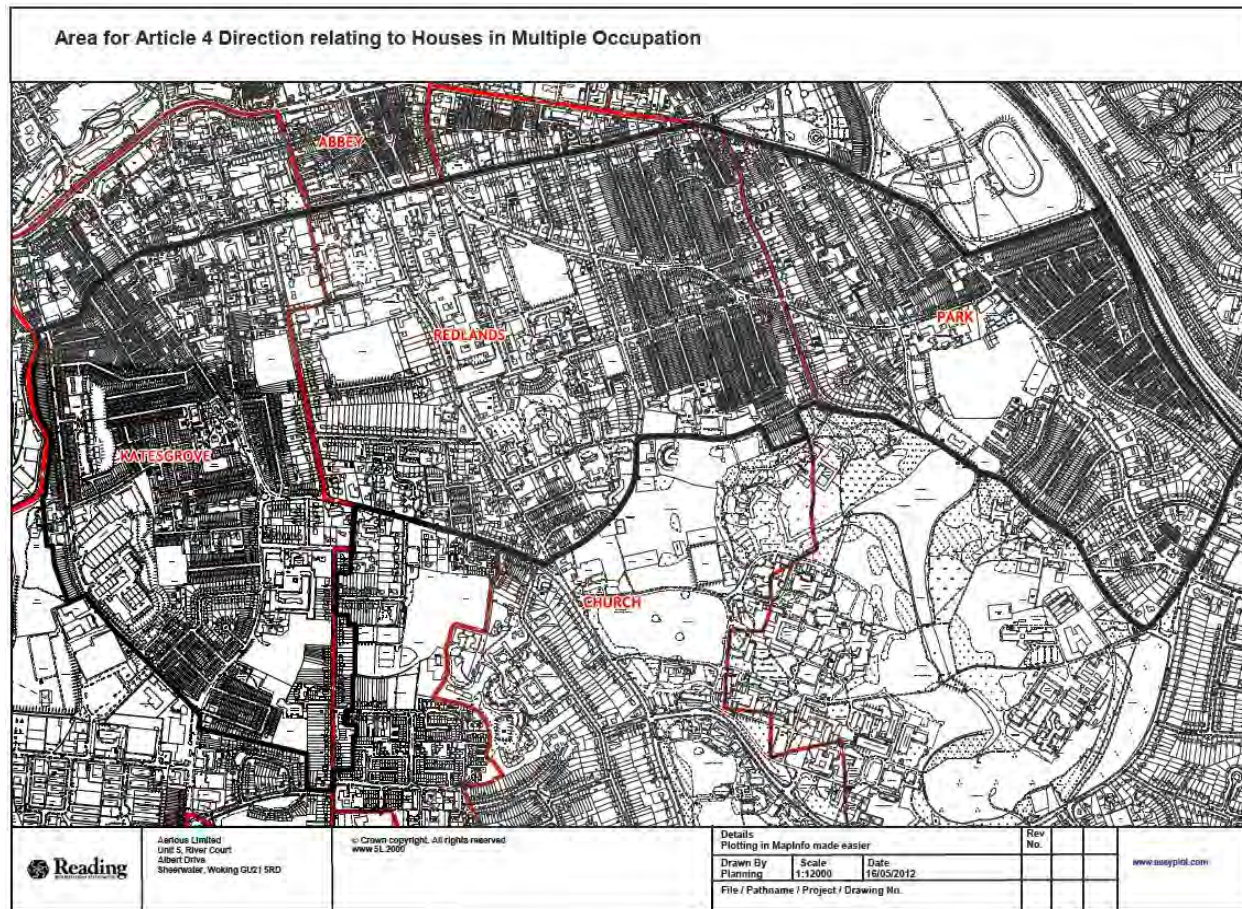
- Homelessness Strategy 2016-2021 Reading Borough Council
- Article 4 Direction – May 2012, Reading Borough Council
- ‘Small Houses in Multiple Occupation and the Article 4 Direction Review’ – July 2015, (Reading Borough Council)
- Joint Venture Management Plan by University of Reading and UPP (to be presented to locals)
- Exeter City Council: Supplementary Planning Document: University (<https://exeter.gov.uk/planningservices/planning-policy/supplementary-planning-documents/university-spg/>)

Reading Wards Map



Source: Reading Borough Council Wards 2004

Area of Article 4 Direction



VARLEY, GILLIAN

From: Francis Brown
Sent: 26 January 2018 13:28
To: Planning Policy
Cc: Gillian Varley
Subject: Local Plan Section EN7N Item EN7Nn,

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

Sent at the request of

Gillian Varley

Questions

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
 - a. Traffic movements
 - b. Air pollution
 - c. Noise pollution
 - d. Visual dominance and overbearing on the area of the site where they propose to build
 - e. Privacy and overlooking
 - f. Out of character with local residential properties
 - g. Light pollution
 - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
 - i. Hours of operation
 - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Yours faithfully
Gillian Varley

Click [here](#) to report this email as spam.

VIRIDIS REAL ESTATE SERVICES LIMITED

26 January 2018
18.01.26 PSLP Reg 19 Repls on behalf of Viridis Real Estate Services Limited



Planning Policy
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Steven Roberts
E: steven.roberts@savills.com
DL: +44 (0) 118 952 0501

Ground Floor, Hawker House
5-6 Napier Court
Napier Road
Reading RG1 8BW
T: +44 (0) 118 952 0500
savills.com

SENT BY EMAIL

Dear Sirs,

TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

READING BOROUGH COUNCIL – PRE-SUBMISSION DRAFT LOCAL PLAN 3036

Savills act on behalf of Viridis Real Estate Services Limited (Viridis) in relation to land at 38-41 Kenavon Drive, Reading (the Site). This letter has been prepared in response to the Council's Regulation 19 consultation on the Pre-Submission Draft Reading Borough Local Plan 2036 (PSLP).

Viridis hold the sole interest in the site, identified by PSLP Policy CR13c as a sub-development area referred to as 'Kenavon Drive & Forbury Business Park' and earmarked for residential development.

Viridis made representations in response to the Reading Borough Council (RBC) Housing and Economic Land Availability Assessment Site Availability and Achievability consultation in November 2016 and the Regulation 18 Draft Reading Borough Local Plan 2036 (FDLP) consultation in June 2017. A copy of these representations are included at Appendix 1.

Having reviewed the Council's Statement of Consultation on the FDLP (November 2017) and the PSLP, Viridis consider that many of the points raised in the FDLP response remain unresolved and therefore resubmit their FDLP consultation response alongside this letter for consideration.

Introduction

Having regard to the provisions in the Planning and Compulsory Purchase Act 2004 (as amended), the PSLP must be considered against the following:

- Whether its preparation has complied with the duty to co-operate; and
- Whether the plan is sound and is compliant with the legal requirements.

The National Planning Policy Framework (NPPF) makes clear at paragraph 182 that to be sound a Local Plan should be:

- *Positively Prepared* – *"the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from*

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”;

- Justified – *“the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”;*
- Effective – *“the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities”;* and
- Consistent with National Policy – *“the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.*

In summary, it is considered that the PSLP does not fulfil these requirements for the following reasons:

1. The Objectives fail to identify the NPPF requirement to make the most efficient use of land by optimising the development potential of the draft allocations, particularly in the Central Reading area. This contradicts paragraphs 19, 47 and 58 of the NPPF;
2. The spatial strategy does not place enough emphasis on Central Reading as the most sustainable location for new housing;
3. The Local Plan does not address the full objectively assessed housing needs of Reading;
4. The approach to the private rented sector is not supported by the Council’s evidence base and places unreasonable restrictions on developers, which challenges the deliverability and effectiveness of the build to rent policy;
5. The approach to development density and tall buildings does not recognise the strategic importance of the East Side Major Opportunity Area in relation to meeting the needs of Reading and will not optimise the potential of land for housing;
6. The draft allocation at Policy CR13c: *Kenavon Drive & Forbury Business Park* does not positively plan for the known housing growth needs of Reading on the basis that the indicative site capacity is significantly lower than can be achieved on the site, having regard to the site constraints and local context.

Site

The site is located to the east of Reading town centre and is approximately 2.1 hectares in area (see attached location plan).

The site is bound to the north by the Reading to Paddington mainline, to the east by the Bellway Homes site (formally 42 Kenavon Drive), to the south by Kenavon Drive, and by Forbury Retail Park to the west. The Toys R Us and Homebase development site on the south side of Kenavon Drive has a resolution from the Council to grant planning permission for a high density residential led mixed use scheme subject to there being no Direction to the contrary from the Secretary of State and completion of a Section 106 Agreement.

The wider area comprises a range of land uses, including: retail to the southwest and west; and residential to the east and southeast. Building heights also vary from two/three storey houses to the southeast to

six/seven/eight storeys to the east and south. The Toys R Us and Homebase proposals include buildings up to 11 storeys in height.

Scope of Response

This letter should be read in conjunction with Viridis' Regulation 18 First Draft Local Plan (FDLP) response, which accompanies this letter. Where it is considered that the Council has not addressed issues previously raised this letter will expand on these points.

Where we have suggested changes to the Local Plan, text to be deleted is show with a ~~strikethrough~~ and new text is show underlined.

Vision and Objectives – Objective 2

Viridis welcome the changes made to Objective 2 and the reference to brownfield land. However, the Council has not addressed in full the comments raised in our FDLP response (page 2) in relation to housing delivery. We would reiterate our comments that the Council's objective should be to optimise the development potential of brownfield sites in accordance with paragraphs 17 and 58 of the National Planning Policy Framework (NPPF).

The Council's published 'Statement of Consultation on the First Draft Local Plan' (SoC) acknowledges that the NPPF refers to the need to 'optimise' the potential of sites, but adds that paragraph 58 of the NPPF is caveated by also referring to optimising the ability of sites to accommodate a range of uses including housing, as well as green/public space. This is not an accurate interpretation of paragraph 58.

We recognise the Council's caution, in that they do not wish to encourage overly dense development. However, the NPPF has been careful to adopt the term 'optimise' rather than 'maximise' and in so doing there is an inference at paragraph 58 that development should have regard to all constraints in making an efficient use of land. In addition, the relevant bullet point under paragraph 58 does not say that other uses and public space should be optimised, here the Council has misunderstood the text, which actually lists three sub-requirements for development. Paragraph 58 actually states that:

"Planning policies and decisions should aim to ensure that developments:

- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development*
- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit*
- *optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks*
- *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation*
- *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion*
- *are visually attractive as a result of good architecture and appropriate landscaping"*

When read correctly, paragraph 58 clearly requires development to optimise the potential of sites. Doing so does not override or undermine other requirements, such as public open space or other land uses.

We would add that if the Council takes the opportunity to optimise the development potential on sites, it will be well placed through Policy H3 to deliver affordable housing. Given the provision of affordable homes is a specific policy requirement Viridis do not consider it necessary to include this in Objective 2.

In this context Objective 2 does not meet the following tests of soundness:

- positively prepared; and
- consistent with national policy.

Proposed changes:

We would therefore request the following changes to Objective 2:

“Make the most efficient use of Reading’s limited land, particularly by optimising the development potential of previously developed land, to ensure that as many new homes as possible are delivered to meet identified needs, ~~particularly needs for affordable housing.~~”

Spatial Strategy for Reading

The Council’s spatial strategy states that 7,600 homes will be delivered in Central Reading over the Plan period (2013-2036). This is a reduction from the 7,700 homes stated in the FDLP. The reasoned justification for Policy H1 explains the figure, which is almost 50% of the overall housing target, is the result of the tightly constrained nature of Reading which limits the development opportunities in the central area. Although we welcome the approach to focus housing in the Central Reading, for the reasons set out later in this letter we are of the opinion that the spatial strategy is contrary to paragraphs 47 and 58 of the NPPF in failing to significantly boost the supply of homes in the most sustainable area of Reading by optimising the development potential of sites.

On this basis the spatial strategy does not meet the following tests of soundness:

- justified;
- positively prepared; and
- consistent with national policy.

Proposed changes:

The spatial strategy should be amended to reflect the requirement of the NPPF to promote sustainable patterns of development by optimising the development opportunities in Central Reading to enable a greater number of homes to be delivered in the central area.

Policy H1 – Provision of Housing

As set out in the FDLP response (pages 3 and 4) the objectively assessed need (OAN) for Reading is 16,077¹. Draft Policy H1 states that the Local Plan will make provision for 15,433 homes up to 2036, which equates to a shortfall of 644 dwellings per annum. The Council’s justification for this is that Reading is tightly constrained and that this therefore limits development opportunities. The Reading Housing and Economic Land Availability Assessment (HELAA) provides the evidential basis for the Council’s approach to establishing the housing capacity within its administrative area.

However, we would challenge the methodology for assessing the capacity of Reading, specifically the assumptions made in relation to density which remain unchanged from the Council’s Regulation 18 consultation (see Viridis’ FDLP response, pages 3-5).

Further evidence that the HELAA underestimates the development capacity of Reading can be found in two recent planning decisions the Council has made, including:

- Former Cooper BMW garage on Kings Meadow Road (to the west of the Viridis site) for 315 dwellings at a density of 642 dph (reference 162166/FUL).

¹ Berkshire Strategic Housing Market Assessment (2016)

- Toys R Us and Homebase on Kenavon Drive (to the south of the Viridis site) has a Council resolution to grant planning permission for 765 dwellings at a density of 273 dph (reference 170509/FUL).

These individual densities significantly exceed those set out in the HELAA and the associated site assessments. This demonstrates that the approach the Council has taken in its assessment of the development capacity of Reading is too precautionary and Policy H1 is therefore contrary to paragraph 47 of the NPPF in failing to significantly boost the supply of homes by not planning for the OAN of Reading.

On this basis Policy H1 does not meet the following tests of soundness:

- positively prepared; and
- consistent with national policy.

Proposed changes:

We would request that the Local Plan adopt a more positive approach to the capacity of Reading, particularly in Central Reading and the major opportunity areas where access to public transport, services and amenities is greatest. This should be achieved by optimising the development opportunities of sites in accordance with the NPPF in order to deliver as many homes as reasonably possible within the Council's administrative area and to address the OAN of Reading. Until such time that the Council has prepared a HELAA that properly assesses the capacity of Reading, Policy H1 should be amended to address the OAN, as follows.

"Provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036.

To address the objectively assessed need of Reading Borough, the Council will require applicants to make efficient use of land and to optimise the development potential of sites to deliver as many homes as possible, having regard to policy and site constraints.*

The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that ~~the~~ any identified shortfall of 644 dwellings that cannot be provided within Reading will be met over the plan period."

** 16,077 dwellings in the period up to 2036 as confirmed in the Berkshire Strategic Housing Market Assessment (2016)."*

Policy H4 – Build to Rent Schemes

Our client welcomes the introduction of a policy to support the private rental sector (PRS), the principle of which responds to comments made in their FDLP response. However, the details of the policy are concerning and there is no evidence base, local, or otherwise, underpinning its requirements.

Criterion 1 of Policy H4 seeks to impose a covenant on any PRS scheme which will require the development to be retained in single ownership solely for the rental market for a minimum period of 30 years. In the event that the covenant is not met the policy makes provision for a clawback of any affordable housing contributions.

There is no national policy or evidential foundation for the requirement of a covenant, let alone one that exceeds 30 years.

The Government has highlighted its commitment to the PRS and in its 'Housing White Paper' (February 2017) confirmed its intention to amend the NPPF to ensure that Councils plan proactively for the PRS and to make it easier for PRS developers to offer affordable private rental products as part of their affordable housing contribution. At the same time the Government has consulted on its 'Planning and Affordable Housing for Build to Rent' paper which sought views on planning measures to support an increase in build to rent schemes.

Although this paper was for consultation purposes only, the government made clear its position on the use of covenants in relation to PRS schemes, stating on page 24 that:

“The Government is aware of an emerging practice whereby Build to Rent schemes enter into a covenant with local authorities to remain in the Private Rented Sector for a minimum period, e.g. 15 years. The Government has considered this issue and:

- *Recognises that Build to Rent schemes are different, in viability terms (as already referenced in planning guidance) and that local authorities want to be reassured about the purpose of the development in order to take this into account in viability calculations;*
- *Does not think it necessary to specify a minimum covenant period for homes to remain in the Private Rented Sector at a time when investors may still need an exit route (particularly in locations where the market for Build to Rent is not yet proven);*
- *Does not want to create a perverse incentive to developers to game the system by rapidly converting a Build to Rent planning application into a for-sale scheme (which is one reason for the practice of adopting covenants).”*

On this basis, we would challenge the justification for imposing covenants on build to rent schemes and given the clear position of the government it is very possible that Policy H4 as presently drafted would conflict with any emerging NPPF updates relating to the private rental sector.

Notwithstanding the above, in relation to the proposed duration of the covenant there is again no evidence to support the Council’s approach. The Greater London Authority has significant experience in plan making and decision taking in relation to build to rent schemes. Its *‘Homes for Londoners’* document (August 2017)² states at paragraph 4.12 that covenants should be a minimum of 15 years. This approach has followed through into the Mayor’s Draft London Plan (December 2017), specifically draft Policy H13, and been adopted by the London Boroughs in determining planning applications for build to rent proposals.

More locally, the planning permission at the Former Cooper BMW garage on Kings Meadow Road (reference 162166/FUL) was for a 100% PRS development and a 20 year covenant was secured in the associated Section 106 Agreement. Although for the reasons set out earlier we do not agree with the principle of imposing a covenant, there is a clear inconsistency between the Council’s approach to decision taking and plan making.

On the basis that the government has been clear that there should be no barriers to the PRS, that development plan policies should be deliverable, and that there is no evidence to support the use of a 30+ year covenant, we conclude that there is no justification to follow a different approach to the GLA and therefore a 15 year covenant would be more reasonable.

On this basis Policy H4 does not meet the following tests of soundness:

- positively prepared;
- justified;
- effective; and
- consistent with national policy.

Proposed changes:

We would therefore request that Policy H4 be amended to omit any reference to ownership covenants and that any clawback requirement is capped at 15 years.

“Planning permission will be granted for developments of self-contained, private rented homes which:

² Homes for Londoners: Affordable Housing and Viability Supplementary Planning Guidance (August 2017)

- ~~1. Are secured in single ownership providing solely for the rental market for a minimum 30 year term with provision for clawback of~~ Secure a clawback mechanism to enable additional affordable housing contributions to be recouped in the event that private rented homes are sold during the first 15 years following first occupation and that this has increased the viability of the scheme. Any additional affordable housing contribution will be capped at 30% overall in accordance with Policy H3, should the covenant not be met; and
2. Provide tenancies for private renters for a minimum of three years with a six month break clause in the tenant's favour and structured and limited in-tenancy rent increases agreed in advance; and
3. Provide a high standard of professional on-site management and control of the accommodation; and
4. Meet Reading Borough Council's Rent with Confidence Standards; and
5. Provide for a mix of unit sizes in accordance with Policy H2; and
6. Meet the standards of design set out in Policy H4; and
7. Provide 30% on-site affordable housing, either in accordance with Policy H2 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document. "

Policy CR10 – Tall Buildings

Our client made detailed representations in relation to Policy CR10 in its FDLP consultation response (pages 9-11). The Council has made no changes to Policy CR10 in the current consultation document and has not reviewed its evidence base to understand whether any updates could be made to deliver more homes in the most sustainable locations.

In response to Viridis' FDLP representations the Council's SoC document states that:

"Whilst the Tall Buildings Strategy is now almost 10 years old, it is still of significant relevance given that it refers to townscapes that in many cases are largely unchanged from what was planned at the time – in fact, in the case of 42 Kenavon Drive, adjacent to the site in question, the development delivered is actually on average of a significantly lower density than what was permitted at the time. Age by itself does not render a document out of date, and no specific reasons why the Strategy is out of date have been given."

Notwithstanding the Council's comments, we maintain the view that there is significant justification for the Council to review its current approach to tall buildings.

Reading is undergoing rapid change and its urban context has evolved since adoption of the Central Reading Area Action Plan in 2009, and publication of the Reading Tall Buildings Strategy (TBS) in January 2008. This is not to say that these documents no longer have relevance rather that the particular needs of Reading are such that it is only right that the Council consider whether its approach to tall buildings is delivering sustainable development to meet the needs of Reading at the rate needed. Furthermore, it may be that the emerging townscape needs to be considered following commencement and completion of a number of large buildings.

Our client's position is that the Council should review its strategy and consider whether in new urban quarters such as the East Side Major Opportunity Area can support tall buildings. The Council's own TBS recognised the potential for taller buildings in this areas, stating that:

"The area is characterised by large blocky structures. Therefore a tall building would not appear uncharacteristic in terms of urban grain and townscape scale. There are few key views which characterise the area and therefore tall buildings would not jeopardise the visual experiences of the area. However, there are no buildings over 10 storeys within the area. A significantly taller building would become visually prominent, although assuming careful consideration is given to the design and placing, the building could provide focus to the area."

The context of the East Side Opportunity Area has evolved since the TBS with the completion of 42 Kenavon Drive, which rises to 8 storeys and is clearly visible in views from the north, and the construction of Kings Point to the south, which will be 18 storeys when complete. This latter building is already prominent in views from Kings Meadow to the north of allocation CR13c and when complete will form part of a newly emerging and dynamic skyline. These developments should be taken into consideration in preparing any policy on tall buildings.

These factors show that the Council has not had sufficient regard for its own evidence base and erred in not planning positively for the known pressures on the town to deliver 699 homes per annum. Based on the PSLP draft allocations the East Side Major Opportunity Area is envisaged to deliver a minimum of 2190 homes over the plan period, which can only be considered to be of strategic importance to Reading in both housing delivery and regeneration terms. This alone is reason to consider the case for tall buildings in this new residential led quarter, which among other things will now, as part of the Toys R Us scheme, accommodate a new frontage to the river, with leisure uses and moorings.

On this basis Policy CR10 does not meet the following tests of soundness:

- positively prepared;
- justified;
- Effective; and
- consistent with national policy.

Proposed changes:

We would therefore request that Policy CR10 be amended to enable tall buildings within the East Side Opportunity Area in accordance with the recommendations of the Council's TBS.

Policy CR13 – East Side Major Opportunity Area

Viridis welcomes the inclusion of a draft site allocation under sub-area Policy CR13c: *Kenavon Drive & Forbury Business Park*. However, for reasons already touched upon earlier and in Viridis' FDLP response, the Council's precautionary approach to development density results in Policy CR13c setting an indicative unit number of 130-190 homes on this site. This fundamentally conflicts with the NPPF in relation to optimising the potential of sites and the requirement to significantly boost the supply of homes.

The Council's SoC states in response to Viridis' FDLP representations (pages 12 and 13) on Policy CR13c that:

"The Council has not sought to design any development on the site, and has used a methodology that is consistent across the Borough. It will be for an applicant to demonstrate that a specific scheme is appropriate."

This reinforces the point made earlier in this letter, that the Council has adopted a crude approach to assessing the development potential of sites, underpinned by the flawed pattern book density baseline in the Council's HELAA.

The Council's approach treats the allocation site as urban (Figure 2, page 10) and adopting the 'pattern book' method has taken an average of recent developments in the 'urban' area. This results in an average density of 74dph, applied to all sites within the 'urban' area. This effectively means that sites in areas characterised by a very clearly defined domestic scale of development built around lower densities, such as Caversham, Norcote and Redlands, are considered at the same density as the draft allocation at Kenavon Drive.

This approach runs contrary to the NPPF, specifically paragraph 59 which explains that density standards should be informed by neighbouring development and the wider local area. If this very sensible method was adopted then from a cursory glance at nearby development, the draft allocation indicative capacity should have regard to the following:

- Toys R Us site: 273 dph (planning reference 170509/FUL);
- Former Cooper BMW site: 642 dph (planning reference 162166/FUL);
- The Meridian Kenavon Drive: 209 dph (planning reference 030918);
- Land at 42 Kenavon Drive: 77dph (planning reference 131280).

The average density of these neighbouring and local developments would be 300dph. In consideration for the particular site constraints, which the Council states in its SoC should see density reduce from west to east, and the two local density extremes at the Former BMW site and 42 Kenavon Drive, we would take the view that a sensible, realistic and achievable density range for allocation CR13c would be 200dph to 250dph, which roughly equates as between 415 and 515 units.

On this basis Policy CR13c does not meet the following tests of soundness:

- positively prepared;
- justified; and
- consistent with national policy.

Proposed changes:

We would therefore request that Policy CR13c be amended to increase the indicative development potential to reflect the densities achieved on neighbouring development, which has been found by the Council to be acceptable in planning terms.

Conclusion

Viridis trust that the comments made in this letter and accompanying representations in response to the Council's earlier Regulation 18 Draft Reading Borough Local Plan 2036 consultation are a helpful contribution to the Local Plan 2036 process. In particular, Viridis highlight the requested changes that have been made in order to address aspects of the draft Local Plan that in our view are not robust.

Yours sincerely,

Steven Roberts
Associate

Appendix 1

Draft Reading Borough Local Plan 2036 Regulation 18 Consultation Response

Response on behalf of Viridis Real Estate Services Limited

June 2017



Contents

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2.	Comments on Draft Local Plan Document	2
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Appendix 1 – Location Plan

1. Introduction

- 1.1. This submission is made on behalf of Viridis Real Estate Services Limited (Viridis), in response to Reading Borough Council's (RBC) consultation on the Draft Reading Borough Local Plan 2036 (DLP).
- 1.2. Viridis hold the sole interest in land to the north of Kenavon Drive, identified on the red line plan included at Appendix 1. This site is identified by DLP Policy CR13c as a sub-development area referred to as "Kenavon Drive & Forbury Business Park" for residential led development.
- 1.3. Savills submitted representations on behalf of Viridis in response to the RBC Housing and Economic Land Availability Assessment Site Availability and Achievability consultation in November 2016. Those representations confirmed that the site is available for development during the Plan period (year 0-5) for at least 500 units and that there are no constraints that effect achievability.
- 1.4. The topics relevant to the consideration of whether the DLP represents a 'sound' Local Plan are set out in the National Planning Policy Framework (NPPF), paragraph 182, as follows:
 - Positively Prepared – *"the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development"*;
 - Justified – *"the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence"*;
 - Effective – *"the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities"*; and
 - Consistent with National Policy – *"the plan should enable the delivery of sustainable development in accordance with the policies in the Framework"*.

2. Comments on Draft Local Plan Document

Vision and Objectives

Objective 2

2.1 Viridis welcomes the aim of Objective 2 to make the best use of Reading's limited land to deliver as many new homes as possible during the Plan period. However, for reasons set out in these representations, it is our view that the DLP underestimates the development capacity of Reading, particularly central Reading (see paragraphs 2.4-2.12 and 2.43-2.51 below) and in doing so conflicts with the requirements of the NPPF to make effective use of brownfield land by optimising the development potential of the sites (paragraphs 17 and 58).

2.2 On this basis Objective 2 does not meet the following tests:

- positively prepared; and
- consistent with national policy.

Proposed changes:

2.3 We would therefore request that the following text be added to Objective 2:

Make the best use of Reading's limited land by optimising the development potential of sites, particularly brownfield land, to ensure that as many new homes as possible are delivered to meet identified needs, particularly needs for affordable housing.

General Policies

Policy H1 and relevant supporting text (paragraphs 4.4.1-4.4.5) Provision of Housing

- 2.4 Draft Policy H1 states that the Plan will make provision for at least 15,134 homes over the plan period to 2036 (658 per annum). The 2016 Berkshire Strategic Housing Market Assessment (SHMA) establishes the need for 16,077 homes in Reading over the same period (699 homes per annum). The reasoned justification supporting Policy H1 acknowledges that its housing figure is 943 homes short of the objectively assessed need (OAN) identified in the SHMA. However, it seeks to justify this on the basis that the administrative boundary is tightly drawn around the urban area and that development opportunities are limited to brownfield sites because of the environmental and planning policy constraints on undeveloped land. The text further states that this assumption has been validated by the Council's Housing and Economic Land Availability Assessment (HELAA).
- 2.5 Viridis recognise the constraints that Reading has to grapple with in meeting its growth needs and that RBC has sought to demonstrate its capacity for housing growth by preparing its HELAA. However, having reviewed the HELAA, we consider that the RBC has underestimated its capacity, particularly in the central Reading area.
- 2.6 The Site Summaries provided at Appendix 1 of the HELAA sets out the conclusions on the development potential of a range of sites. Viridis' site is referred to as Forbury Business Park and Kenavon Drive (Site Code AB015). The HELAA defines the site as being in an 'Urban' area and concludes that it has capacity for 142 residential units, which equates to a density of 49 dwellings per hectare. The detailed site tables provided in Volume 2 of the HELAA presents more detailed evidence that underpins the conclusions in Appendix 1. Here it is explained that the site density is based on the 'pattern book' approach and as an 'Urban Residential new-build' this equates to 74 dwellings per hectare. The 'pattern book' approach is a generic density tool which does not take account of the individual circumstances of a site or housing market conditions that may justify higher densities.

2.7 In contrast the adjacent site, referred to as the Forbury Retail Park (Site Code AB014) has been treated as 'Town Centre Fringe' with a density well in excess of 200 dwellings per hectare. It is our view that there is no difference between the site, environmental or planning policy constraints of both sites and that the Forbury Business Park and Kenavon Drive site should be considered as 'Town Centre Fringe' where higher density development will be permitted, which would reflect its location in one of the central Reading opportunity areas.

2.8 The RBC Sustainability Appraisal (SA) of the Draft Local Plan dated May 2017 examines the draft policies against a range of environmental, social and economic objectives. The SA assessed five options under Policy H1, Option (ii) being the policy in the draft Local Plan and Option (iv) being the provision of the OAN of 699 dwellings per annum. In rejecting Option (iv) the SA states that:

"This option aims to provide the number of dwellings recommended by the SHMA. Due to the constrained nature of land within the Borough, this would place strain on undeveloped land (4) and the natural environment (7), as well as services such as health (15) and education (20) and bring a tendency towards negative effects. If this policy pushed development out towards less well-connected areas of the borough, sustainable transport (14) would see a tendency towards negative effects, too. High density development in inappropriate locations would negatively affect townscape character (9). Effects to employment (18) are unclear, while housing provision (13) would see positive effects."

2.9 The SA makes the incorrect assumption that meeting the full OAN would negatively effect undeveloped land and the natural environment. This would only be the case if the Council fails to make efficient use of previously developed sites in the centre of Reading. Furthermore, the Council is in the position to manage change in more sensitive areas through its other Local Plan policies. All development would place additional strain on Borough services and infrastructure, which can be mitigated through planning obligations as necessary. Again the Council is in the position to direct development to areas with existing services and infrastructure to promote sustainable development. It is our view therefore that the Council has erred in underestimating the development potential of its sustainably located previously developed sites in the central areas of Reading, and that by being more ambitious in these areas, i.e. at Site AB015, the social, environmental and economic effects of additional housing numbers to meet the full OAN could be managed.

2.10 If the density of the Forbury Business Park and Kenavon Drive site was increased to reflect its town centre fringe location then the housing figure in Policy H1 could be increased by at least 358 units giving a total site capacity of at least 500 units. Taking into account the highly sustainable location of site AB015, its proximity to a wide range of services, facilities and employment opportunities, and its setting and context that suggest an ability to accommodate a higher density development, its capacity should be identified in the DLP and supporting evidence base documents to be at least 500 units.

2.11 On this basis Policy H1 does not meet the following tests:

- positively prepared; and
- consistent with national policy.

Proposed changes:

2.12 We would therefore request that the full OAN be adopted and that policy H1 be amended to reflect this and that the site capacity of site AB015 - Forbury Business Park and Kenavon Drive be identified as being at least 500 units.

Policy H2 and relevant supporting text (paragraphs 4.4.6-4.4.13) Density and Mix

2.13 Policy H2 does not prescribe housing densities, but refers to five factors that should inform development density, including:

- the character and mix of uses of the area in which it is located, including consideration of any nearby heritage assets or important landscape areas;
- its current and future level of accessibility by walking, cycling and public transport;
- the need to achieve high quality design;
- the need to maximise the efficiency of land use; and
- the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.

- 2.14 Viridis welcomes this flexible approach to development density. However, paragraph 59 of the NPPF explains that density standards should be informed by neighbouring development and the wider local area. With this in mind we believe that there are other local factors that should also be included in the density criteria in Policy H2, including housing type, mix and townscape character and context.
- 2.15 Townscape character and context are critical aspects to planning for the quantum and mix units in housing developments. The central Reading area is experiencing change and the new Local Plan should be able to respond to this changing urban context. For example, the East Side Major Opportunity Area (draft Policy CR13), has an emerging character defined by higher density development at Forbury Place to the west and the Bellway Homes development to the east.
- 2.16 Development proposals should be informed by the changing urban environment and that the housing density and mix of a scheme should be able to respond positively without being constrained by rigid density and housing mix requirements.
- 2.17 The private rented sector (PRS) has experienced substantial growth in recent years. In 2015-16 PRS accounted for 20% of households nationwide. Of this, the proportion of PRS households with children increased to 36%¹.
- 2.18 The NPPF provides at paragraph 50 the objective to deliver a wide choice of homes and that local planning authorities should plan for a mix of housing based on current and future market trends and the different need of the community and that they should identify the size, type, tenure and range of housing required in particular locations to meet local demand.
- 2.19 The Government has long supported the provision of PRS and recognises the important role it plays in meeting the needs of the housing market by offering choice and in supporting economic growth and access to jobs². In the wake of the Montague Review (2012)³ the Government implemented a number of measures to promote PRS:

¹ CLG English Housing Survey headline report 2015/16

² Laying the Foundations: A Housing Strategy for England (Housing Strategy) 2011

³ CLG Review of the barriers to institutional investment in private rented homes August 2012

- The formation of a time-limited task force charged with kick-starting the sector;
- Publication of guidance for industry and also for local authorities;
- Facilitating access to short-term and long-term debt finance through the Build to Rent Fund, the Private Rented Sector housing guarantee scheme, and more recently the Home Building Fund;
- Amendments to the NPPF, in particular in reference to viability assessment in the context of PRS schemes.

2.20 In February 2017 the 'Housing White Paper' reinforced the Government's commitment to PRS and confirmed its proposal to change the NPPF to ensure that LPA's plan proactively for PRS and to make it easier for PRS developers to offer affordable private rental products as part of their affordable housing provision. As part of this the Government is consulting its 'Planning and Affordable Housing for Build to Rent' paper which seeks views on planning measures to support an increase in PRS schemes.

2.21 The SHMA shows that in Reading there has been a significant shift towards the PRS between 2001 and 2011, with over 50% of households aged under 35 being PRS. Based on CLG household formation rates and market signals the number of households aged under 35 is set to increase over the period up to 2036.

2.22 In view of the Government approach toward PRS and the demographic and market trends in Reading, the DLP is unsound in that it fails to make provision for the housing needs of all members of the community, in particular the private rental sector.

2.23 On this basis Policy H2 does not meet the following tests:

- positively prepared;
- effective; and
- consistent with national policy.

Proposed changes:

2.24 We would therefore request that Policy H2 be amended to incorporate the following:

- Refer to housing mix and local character and context in the points relating to density;

- That higher densities will be supported having regard to local character and context;
- Recognise the importance of PRS as a viable housing product for meeting known housing needs in Reading.

Policy H3 and relevant supporting text (paragraphs 4.4.14-4.4.22) Affordable Housing

2.25 Draft Policy H3 retains the same affordable housing threshold of the RBC Core Strategy 2008 (updated 2015). The policy explains that schemes which are not able to provide the policy compliant level of affordable housing must be accompanied by a viability assessment to demonstrate the circumstances for the lower affordable housing contribution. This approach accords with the NPPF.

2.26 The policy goes on to explain that it will seek the appropriate mix of affordable housing to include social rented, affordable rent, intermediate rent and shared ownership units. We consider that this should be not only be informed by identified Borough wide housing needs, but that the tenure mix should also have regard to local/neighbourhood housing context and site constraints. The reasoning for this is to ensure that balanced and inclusive communities are supported as required by the NPPF.

2.27 Policy H3 also states that the priority need is for family sized housing. However, this does not reflect the findings of the SHMA which states that for Reading 43% of units should be 1 bedroom, 32.9% 2 bedroom, 21.6% 3 bedroom and 2.1% 4+ bedroom. The NPPF states that housing mix requirements should be based on local demand. In the absence of a RBC Housing Needs Assessment, Policy H3 should adopt the SHMA figures.

2.28 On this basis Policy H3 does not meet the following tests:

- positively prepared;
- justified; and
- consistent with national policy.

Proposed changes:

2.29 We would therefore request that Policy H3 be amended to incorporate the following:

- State that in addition to identified housing needs, affordable housing mix will be informed by site constraints and local/neighbourhood housing context;
- Delete “Priority needs are currently for family sized housing, specialist accommodation for vulnerable people and extra care housing. The Council will regularly monitor and review the need for, and delivery of, affordable housing.”

Policy CR10 and relevant supporting text (paragraphs 5.3.35-5.3.51) Tall Buildings

2.30 With the exception of some inconsequential changes to the text, Policy CR10 repeats the Council’s existing tall buildings policy (RC13) in the Central Reading Area Action Plan (AAP) (January 2009). It continues to define tall buildings as 10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres tall) or above, and that tall buildings will only be permitted within the three ‘areas of potential for tall buildings’, i.e. the Station Area Cluster, Western Grouping and the Eastern Grouping (as identified on the Proposals Map).

2.31 The SA examines four policy options, including no policy (Option i), continue current policy (Option ii), amend policy approach to include more scope for tall buildings (Option iii) and amend to further limit scope for tall buildings (Option iv). Option (iii) is the preferred option and states that it provides for additional scope for tall buildings. Viridis has compared draft Policy CR10 with adopted Policy RC13 (and the respective supporting text) and can find no changes of any substance that would provide “additional scope for tall buildings”.

2.32 AAP Policy RC13 is informed by the Reading Tall Buildings Strategy (TBS) published in January 2008. This document is over 9 years old and Reading has seen significant change during the intervening period. It is our view that to simply repeat adopted policy restrictions within a rapidly changing urban context and in the current housing climate, without any technical assessment, fails to plan positively for Reading’s current and future growth needs and is therefore fundamentally flawed.

2.33 Notwithstanding this, in light of the Council's preferred approach Viridis has reviewed the TBS, SA and draft Policy CR10 in detail and would raise the following points.

Tall Building definition

2.34 The TBS adopts the approach that 'tall' is 10 commercial storeys or equivalent. This informed the threshold in AAP Policy RC13, which has been incorporated in draft Policy CR10 of the DLP.

2.35 However, what is tall in one context may not be termed tall in another. CABE 'Guidance on Tall Buildings' (2007) offers no definitive definition for tall buildings. Instead it refers to context, i.e. that a 10 storey building could be deemed as 'tall' in the context of two storey Victorian terraces, whereas it may not be seen as such within a city centre. The criteria for assessing tall buildings in the CABE guidance explains that it is intended for buildings that are substantially taller than their neighbours and/or which significantly change the skyline.

2.36 It is therefore our view that adopting a blanket approach to defining what constitutes a tall building across Reading is too crude, particularly in light of its new urban landscape emerging in the town centre.

Areas of potential for tall buildings

2.37 Paragraph 5.2.15 of the DLP states that central Reading has physical capacity to incorporate a significant level of new development at high densities. As a consequence paragraph 5.2.16 states that central Reading will accommodate 7,700 homes (along with 100,000 sqm of office space and 40,000 sqm of retail space) over the plan period to 2036, which equates to 51% of the total number of homes being planned for in the DLP.

2.38 Tall buildings have already been planned for within the central area clusters. However, Viridis considers that there to be scope to review this in light of the strategic importance placed on the central area to deliver growth and in view of the points raised above. For instance, within the East Side Major Opportunity Area (draft Policy CR13), is no longer characterised by solely low density development (as it was when the TBS was being prepared in 2007), having seen Forbury Place (11 storeys) and the Bellway Homes development (up to 8 storeys) to the west and east of the opportunity area completed. In addition, current planning applications, such as on the Toys R Us site propose taller buildings up to 12 storeys.

2.39 The TBS Townscape and Visual Assessment examined the Viridis site (Character Area 10: Forbury Retail Park) and concluded that:

“The area is characterised by large blocky structures. Therefore a tall building would not appear uncharacteristic in terms of urban grain and townscape scale. There are few key views which characterise the area and therefore tall buildings would not jeopardise the visual experiences of the area. However, there are no buildings over 10 storeys within the area. A significantly taller building would become visually prominent, although assuming careful consideration is given to the design and placing, the building could provide focus to the area.”

2.40 On the basis of the above, and in acknowledgment of the strategic housing delivery importance of the central Reading area, draft Policy CR10 should enable consideration of tall buildings as part of major regeneration sites in the East Side Opportunity Area.

2.41 On this basis Policy CR10 does not meet the following tests:

- positively prepared;
- justified;
- Effective; and
- consistent with national policy.

Proposed changes:

2.42 We would therefore request that Policy CR10 be amended to enable tall buildings within the East Side Opportunity Area.

Policy CR13 and relevant supporting text (paragraphs 5.4.21-5.4.30) East Side Major Opportunity Area

2.43 Viridis welcomes the aim of Policy CR13 to create an area with a more urban character with high density development. However, this vision is not carried through into sub-area Policy CR13c: *Kenavon Drive & Forbury Business Park*, which states that the site would be largely residential in nature with an indicative development potential for 130-190 units. The draft allocation is 2.07 hectares and on this basis the density based on the indicative capacity would be between 62 dwelling per hectare and 91 dwellings per hectare.

2.44 The site is in central Reading, on the edge of the town centre and therefore has excellent access to services and existing infrastructure, including public transport. As set out earlier (paragraphs 2.6-2.8), the indicative development potential does not reflect other policies in the draft Local Plan (including those relating to density), the NPPF requirement to optimise the development potential of previously developed sites (reinforced by the Housing White Paper) and the fact that the site lies in an opportunity area with significant potential to contribute substantially to meeting the housing needs of Reading. In this context, higher densities can be reasonably delivered

2.45 Viridis entered into pre-application discussions with RBC in 2013 and 2016, where they demonstrated that the site could accommodate circa 500 units. This would achieve a density of 240 dwellings per hectare, which is comparable to the density of sub-area Policy CR13b: *Forbury Retail Park* and the current planning application at the Homebase and Toys R Us site (part of sub-area CR13b) which proposes 765 units at a density of 275 dwellings per hectare.

2.46 While it is noted that paragraph 5.4.22 states that the indicative development capacity figures are an indication only, it does not represent the true development potential of the site and will not serve to assist applicants and decision takers alike.

- 2.47 In view of the central location, and the substantial contribution the site could make towards meeting the 7,700 homes target, and for the reasons set out elsewhere in this submission, the indicative potential for sub-area Policy CR13c: *Kenavon Drive & Forbury Business Park* should be increased to at least 500 homes.
- 2.48 Paragraph 5.4.27 states that the Kenavon Drive Urban Design Concept Statement (UDS) continues to be relevant in the context of the East Side Major Opportunity Area. The UDS was adopted in 2004 and pre-dates the RBC Core Strategy, Central Reading Area Action Plan and the Sites and Detailed Policies Document, as well as the NPPF and indeed a range of recent developments within the Opportunity Area.
- 2.49 Whilst the broad aims of the UDS are to be supported, the Key Design Principles referred to in Section 4 are set to a urban and housing need context that no longer exists. The reality is that the character and context of the opportunity area has changed since 2004, as has the extent of Reading's housing crisis and as a consequence the development potential of brownfield sites must be optimised to meet these needs. In today's context the UDS has very limited relevance and conflicts with the development plan and NPPF.
- 2.50 On this basis Policy CR13c does not meet the following tests:
- positively prepared;
 - justified; and
 - consistent with national policy.

Proposed changes:

- 2.51 We would therefore request that Policy CR13c be amended to increase the indicative development potential to at least 500 units, and that the following text in paragraph 5.4.27 be deleted (see ~~striketrough~~ below):



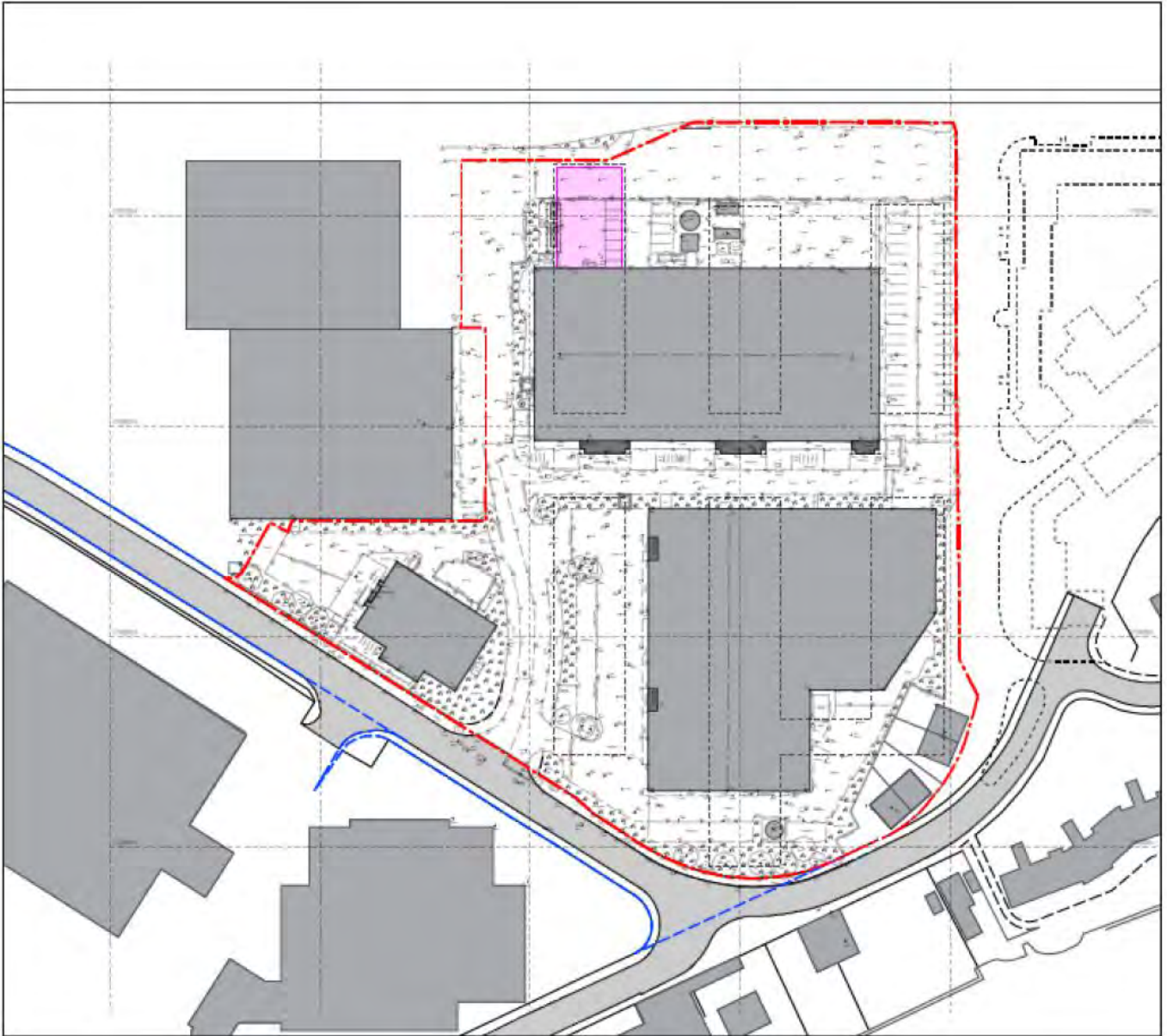
“There are existing Supplementary Planning Documents covering parts of the site, the Reading Prison Framework and the Kenavon Drive Urban Design Concept Statement, and these continue to be relevant.”



3. Conclusion

- 3.1. Viridis trust that the comments made in this submission are a helpful contribution to the ongoing preparation of the Reading Borough Local Plan 2036. In particular, Viridis highlight the requested changes that have been made in order to address aspects of the draft Local Plan that in our view are not robust.

Appendix 1



Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title

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Mr

--

First Name

--

Steven

--

Last Name

--

Roberts

--

Job Title *(if applicable)*

--

--

Organisation *(if applicable)*

Viridis Real Estate Services Limited

Savills

--

Address 1

--

Ground Floor, Hawker House

--

Address 2

--

5-6 Napier Court

--

Address 3

--

Napier Road

--

Town

--

Reading

--

Post Code

--

RG1 8BW

--

Telephone

--

0118 952 0501

--

E-mail

--

Steven.roberts@savills.com

--

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Vision and Objectives - Objective 2

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please refer to:

Savills letter dated 26 January 2018 - ref: 18.01.26 PSLP Reg 19 Reps on behalf of Viridis Real Estate Services Limited

Draft Reading Borough Local Plan 2036 Regulation 18 Consultation Response - Response on behalf of Viridis Real Estate Services Limited dated June 2017

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

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Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

Viridis has identified that the Pre-Submission Draft Local Plan will not plan positively for the housing needs of Reading and that it fails to promote sustainable patterns of development by optimising the development potential of land in Central Reading. It is therefore necessary for the Council to reconsider its precautionary approach to development density in Central Reading. Viridis own land to the north of Kenavon Drive, referred to by draft Policy CR13c as 'Kenavon Drive & Forbury Business Park', which can make a significant contribution to Reading's objectively assessed need.

It is on this basis that the Oxford Science Village Partners has requested modifications to the Local Plan to make it sound and therefore under Section 20(6) of the Planning and Compulsory Purchase Act 2004 requests the opportunity to be heard at the Examination in Public to support the case set out in its representations referred to above.

B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

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PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Spatial Strategy for Reading

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

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Yes

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PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy H1 - Provision of Housing

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

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Yes

No

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Steven.roberts@savills.com

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PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy H4 - Build to Rent Schemes

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

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B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please refer to:

Savills letter dated 26 January 2018 - ref: 18.01.26 PSLP Reg 19 Reps on behalf of Viridis Real Estate Services Limited

Draft Reading Borough Local Plan 2036 Regulation 18 Consultation Response - Response on behalf of Viridis Real Estate Services Limited dated June 2017

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

Viridis has identified that the Pre-Submission Draft Local Plan will not plan positively for the objectively assessed housing needs of Reading and that it fails to promote sustainable patterns of development by optimising the development potential of land in Central Reading. It is therefore necessary for the Council to reconsider its precautionary approach to development density in Central Reading. Viridis own land to the north of Kenavon Drive, referred to by draft Policy CR13c as 'Kenavon Drive & Forbury Business Park', which can make a significant contribution to Reading's objectively assessed need.

It is on this basis that the Oxford Science Village Partners has requested modifications to the Local Plan to make it sound and therefore under Section 20(6) of the Planning and Compulsory Purchase Act 2004 requests the opportunity to be heard at the Examination in Public to support the case set out in its representations referred to above.

B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title

--

Mr

Mr

First Name

--

Steven

Steven

Last Name

--

Roberts

Roberts

Job Title *(if applicable)*

--

--

Organisation *(if applicable)*

Viridis Real Estate Services Limited

Savills

Savills

Address 1

--

Ground Floor, Hawker House

Ground Floor, Hawker House

Address 2

--

5-6 Napier Court

5-6 Napier Court

Address 3

--

Napier Road

Napier Road

Town

--

Reading

Reading

Post Code

--

RG1 8BW

RG1 8BW

Telephone

--

0118 952 0501

0118 952 0501

E-mail

--

Steven.roberts@savills.com

Steven.roberts@savills.com
--

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CR10 - Tall Buildings

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please refer to:

Savills letter dated 26 January 2018 - ref: 18.01.26 PSLP Reg 19 Reps on behalf of Viridis Real Estate Services Limited

Draft Reading Borough Local Plan 2036 Regulation 18 Consultation Response - Response on behalf of Viridis Real Estate Services Limited dated June 2017

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please refer to:

Savills letter dated 26 January 2018 - ref: 18.01.26 PSLP Reg 19 Reps on behalf of Viridis Real Estate Services Limited

Draft Reading Borough Local Plan 2036 Regulation 18 Consultation Response - Response on behalf of Viridis Real Estate Services Limited dated June 2017

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

Viridis has identified that the Pre-Submission Draft Local Plan will not plan positively for the objectively assessed housing needs of Reading and that it fails to promote sustainable patterns of development by optimising the development potential of land in Central Reading. It is therefore necessary for the Council to reconsider its precautionary approach to development scale and density in Central Reading. Viridis own land to the north of Kenavon Drive, referred to by draft Policy CR13c as 'Kenavon Drive & Forbury Business Park', which can make a significant contribution to Reading's objectively assessed need.

It is on this basis that the Oxford Science Village Partners has requested modifications to the Local Plan to make it sound and therefore under Section 20(6) of the Planning and Compulsory Purchase Act 2004 requests the opportunity to be heard at the Examination in Public to support the case set out in its representations referred to above.

B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title

--

Mr

--

First Name

--

Steven

--

Last Name

--

Roberts

--

Job Title *(if applicable)*

--

--

Organisation *(if applicable)*

Viridis Real Estate Services Limited

Savills

--

Address 1

--

Ground Floor, Hawker House

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Address 2

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5-6 Napier Court

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Address 3

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Napier Road

--

Town

--

Reading

--

Post Code

--

RG1 8BW

--

Telephone

--

0118 952 0501

--

E-mail

--

Steven.roberts@savills.com

--

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CR13 - East Side Major Opportunity Area

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please refer to:

Savills letter dated 26 January 2018 - ref: 18.01.26 PSLP Reg 19 Reps on behalf of Viridis Real Estate Services Limited

Draft Reading Borough Local Plan 2036 Regulation 18 Consultation Response - Response on behalf of Viridis Real Estate Services Limited dated June 2017

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please refer to:

Savills letter dated 26 January 2018 - ref: 18.01.26 PSLP Reg 19 Repts on behalf of Viridis Real Estate Services Limited

Draft Reading Borough Local Plan 2036 Regulation 18 Consultation Response - Response on behalf of Viridis Real Estate Services Limited dated June 2017

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

Viridis has identified that the Pre-Submission Draft Local Plan will not plan positively for the objectively assessed housing needs of Reading and that it fails to promote sustainable patterns of development by optimising the development potential of land in Central Reading. It is therefore necessary for the Council to reconsider its precautionary approach to development scale and density in Central Reading. Viridis own land to the north of Kenavon Drive, referred to by draft Policy CR13c as 'Kenavon Drive & Forbury Business Park', which can make a significant contribution to Reading's objectively assessed need.

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B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

WAITE, P.

From: Pip Waite
Sent: 20 February 2018 11:11
To: Bell, Alison
Cc: Page, Tony (Councillor); Stanford-Beale, Jane (Councillor); Robinson, Simon (Councillor)
Subject: Planning at Reading golf course

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

I am writing to state that I want the above site to be removed from the local plan for the following reasons:

Traffic in Emmer Green and Caversham is always congested already. There are bottle necks at the two bridges every day, for most of the day. The stationary traffic increases pollution making it unpleasant to walk anywhere or even wait at bus stops.

The number 22 bus service has been reduced which means people will have to use their cars more. The bus service north of the river is far less frequent than to other parts of Reading.

The golf course is a greenfield site and is a much needed 'green lung' in an urban area with a traffic problem.

Local infrastructure is barely coping with the existing population. The Heights School was announced 3 ½ years ago and is almost full on its temporary out of area site off Gosbrook Road. There are no firms plans (announced) as to where or when it will be built for existing residents. What provision for education will be included if this development went ahead? The council still has not addressed the fiasco over the lack of a school on the Bugs Bottom development.

The Waitrose car park barely copes with existing customers. Any increase in the local population will put more pressure on the village centre. Anyone living on the new development would have to travel south, towards Caversham and the two bridges to access local services.

The consultation period for this development is far too short. As usual, those most affected seem to be the last to know.

Our local MP is against this development and as he represents us, I hope you will accept his opinion.

P Waite

Click [here](#) to report this email as spam.

WAKELY, NIGEL

From: Nigel Wakely
Sent: 26 January 2018 13:26
To: Planning Policy
Subject: Representation regarding Local Plan (proposal CA1b)

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

I am making this representation at the last minute since I only became aware of the local plan proposals this week. My first comment therefore is that the consultation process is itself ineffective in that it fails to inform those who are likely to be directly affected by proposals.

My representation concerns the proposal to develop part of Reading Golf Club (CA1b).

In my view, this proposal fails the soundness test. It's inclusion in the plan appears to respond to an opportunistic wish to sell land for housing development rather than as a conclusion from objective planning analysis. Reading has very few areas that are not already developed so destroying remaining green space should be considered last of all when assessing the alternatives. From environmental & sustainability viewpoints, it appears perverse to proactively allocate this site.

During the Local Plan's consultation phase, others raised many specific and legitimate concerns that the development would make things worse than they are now for the local community, for example:

- Environmental quality, leisure facilities and green space would be diminished
- Traffic congestion in the local road network and through the bottlenecks of Caversham shopping centre & the Thames bridges would be exacerbated
- Local schools and healthcare facilities are already full and so would become overloaded

The planners' responses do not convince me that adequate funding and actionable plans will be brought forward to properly deal with these concerns. The planning approach appears to simply focus on the provision of additional housing and to brush aside all other issues. In fact, the proposal appears to make existing issues worse than they now are.

If this pocket of land is no longer needed by the golf club, then the plan should consider alternative uses that help solve problems raised during the consultation process and justify why allocation for housing is better for the local community than using it for leisure, provision of healthcare, schools or other needs. Furthermore, I would advocate that if, following sound analysis, housing development is to be allowed, it should be on condition that the remaining green space owned by the golf club is given long-term protection and is opened to provide better public access.

Nigel Wakely

Email:

I would like to be kept informed about the Local Plan.

Click [here](#) to report this email as spam.

WELLS, ALAN

From: Alan Wells
Sent: 24 January 2018 08:25
To: Planning Policy
Subject: Draft Local Plan Section EN7N - Item EN7Nn

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

Hi

I am asking the following questions, along with many other residents using a copy of a list as I am on holiday at the moment. It doesn't detract from my strength of feeling, simply this is an easy way to make my views know.

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
 - a. Traffic movements
 - b. Air pollution
 - c. Noise pollution
 - d. Visual dominance and overbearing on the area of the site where they propose to build
 - e. Privacy and overlooking
 - f. Out of character with local residential properties
 - g. Light pollution
 - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
 - i. Hours of operation
 - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Thank you

Yours faithfully

Alan Wells

WELLS, DEANNA

From: Deanna Wells
Sent: 24 January 2018 08:27
To: Planning Policy
Subject: Local Plan Section EN7N - Item EN7Nn

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

Dear Sir/Madam

I wish to ask the following questions with regard to the draft Local Plan.

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
 - a. Traffic movements
 - b. Air pollution
 - c. Noise pollution
 - d. Visual dominance and overbearing on the area of the site where they propose to build
 - e. Privacy and overlooking
 - f. Out of character with local residential properties
 - g. Light pollution
 - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
 - i. Hours of operation
 - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Yours faithfully

Deanna Wells

WEST BERKSHIRE DISTRICT COUNCIL



25 January 2018

Sent by email: planningpolicy@reading.gov.uk

Planning Policy

Development and Planning
West Berkshire District Council
Market Street, Newbury
Berkshire, RG14 5LD

Please ask for: Planning Policy Team

Direct dial: 01635 519 111

Fax: 01635 519 408

e-mail: planningpolicy@westberks.gov.uk

Dear Sir/Madam,

Pre-submission draft Reading Local Plan

Thank you for consulting West Berkshire District Council (WBDC) on the pre-submission draft Reading Local Plan.

WBDC welcome that Reading has identified an increase in their housing provision figure (as identified in policy H1) thereby reducing their unmet housing need that will have to be met outside of Reading borough. WBDC will work together with the other authorities within the Western Berkshire Housing Market Area (HMA) in relation to Reading's unmet need. A Memorandum of Understanding on Reading's unmet need has now been agreed between the authorities in the Western Berkshire HMA.

We note that Figure 3.2 (Spatial Strategy for Reading), Figure 6.1 (Area Strategy for South Reading), and Figure 7.1 (Area Strategy for West Reading and Tilehurst) all depict a potential future development area that covers an area from the west of Three Mile Cross to south of Theale and Calcot. We would highlight that this is the 'area of search' as shown in the West of Berkshire Spatial Planning Framework. In relation to this and Reading's unmet housing need, we would re-iterate the comments that we made to the draft Reading Local Plan (dated 13 June 2017).

The West of Berkshire Spatial Planning Framework identifies that there is a possible large development opportunity in the Grazeley area (south of the M4); an area that straddles both West Berkshire and Wokingham districts. If development were to come forward in the long-term, then there is the potential for some or all of Reading's unmet housing needs to be accommodated in this area. Nonetheless, such a proposal is not currently included within either West Berkshire's or Wokingham's development plans and further work is still required to assess the potential of this development opportunity.

Work on a comprehensive West Berkshire Local Plan review is underway which will amongst other things refine the housing target to 2036 and include allocations housing and employment. We anticipate the adoption of this document towards the end of 2020. No decisions have been made yet as to the location of any future development.

Given that West Berkshire district has considerable constraints to development; any new housing target identified will be arrived at following additional work which will consider the constraints to, and opportunities for, development, and will be informed by the collaborative work with the other authorities within the Western Berkshire HMA.

Yours faithfully,

Bryan Lyttle
Planning and Transport Policy Manager

WHITE, COUNCILLOR ROB

From: Rob White
Sent: 12 March 2018 16:13
To: Worringham, Mark; Josh Williams
Subject: Re: FW: Coal Woodland

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

Hello Mark

Thanks for your email. I disagree with the assessment of the site. Yes I would like to make the following points to the inspector:

- It doesn't make sense to say that one section of the Coal Wood is Local Green Space and the other isn't. The average person walking through the 2 areas would say they are similar. If you agree with the area that is currently Local Green Space then it all must be Local Green Space
- The boundary between the two sections of the Wood is arbitrary. It would make far more sense to include all of the wooded area up to the River and railway land as Local Green Space.
- Looking at the table below. The area is close to Newtown which it serves. It is special and beautiful as it is the nearest woodland to Newtown which is the most densely populated part of Reading and lacking in the green spaces. I personally enjoy walking in the woods – as do many others – which is a form of recreation. Tranquillity is relative, and compared to the busy main roads this area is tranquil. It is physically connected to Newtown. It forms part of the Kennet Mouth of landscape. And as the name of the Wood suggests it is reclaimed industrial land giving it a local connection.
- Finally as you are aware the council wants to build the East Reading Mass Rapid Transit road through this site, and I can't help but think that this is the reason this area has not been protected in the past and this is the reason the council is reluctant to protect this site now.

Best wishes
Rob

On Mon, Feb 26, 2018 at 8:55 AM, White, Rob (Councillor) <Rob.White@reading.gov.uk> wrote:

From: Worringham, Mark
Sent: 20 February 2018 17:40

To: White, Rob (Councillor)
Subject: Coal Woodland

Councillor White

We have been looking into the issue of the boundary of the identified Local Green Space at the Coal Woodland. We've tried to assess this piece of land on a consistent basis with the way we have approached other candidate areas of Local Green Space. Our officer view is that it doesn't meet the criteria for designation, and therefore we wouldn't propose amending the boundary in the Submission Local Plan. The area remains covered by both the Major Landscape Feature and wildlife designations in the plan, and there is also a general presumption against loss of any undesignated open spaces in draft policy EN8.

My colleague's assessment is below.

Clearly, this is a different conclusion from what you had anticipated, albeit that comments I made were without having undertaken a specific visit. Had we said this at the outset, you may have wanted to make a representation on the Local Plan. For that reason, I think it's fair that you get a chance to have your views on the boundary heard by the Inspector when he considers the Plan. Therefore, if you do want to make a specific comment on this point by Wednesday 14th March, I can ensure that it is recorded as an additional response and put forward to the Local Plan inspector.

Regards

Mark

The NPPF states the following:

“76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.

77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in **reasonably close proximity to the community it serves**;
- where the green area is **demonstrably special to a local community** and holds a particular local significance, for example because of its **beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife**; and
- where the green area concerned is **local in character** and is **not an extensive tract of land.**”

The site (triangular section of the Coal Woodland and Kennet Mouth bounded by the Tesco car park, paved footpath from car park to horseshoe bridge and fencing parallel to the railway) does not meet the criteria for Local Green Space designation. Through desk-based assessment and site visits, the site has been assessed against the following criteria derived from the NPPF (emphasis added in text above):

Is the site in reasonably close proximity to the community it serves?	No	The site does not appear to have any relationship with a particular residential community.
Is it demonstrably special to a local community?	No	Although the paved path just north of the site is well used, the area itself did not appear to be accessed by the public.
Does it hold particular significance because of its beauty?	No	The area is not particularly beautiful. Although there are dense woods, these do not represent one of the best or most visually appealing areas in Reading. There is quite a bit of litter and some informal encampments.
Does it hold particular significance because of its historic significance?	Partially	The site itself is not an area of archaeological significance, but it does border such an area (along the railway).
Does it hold particular significance because of its recreational value?	No	There is no space for recreation or any path through the site.
Does it hold particular significance because of its tranquillity?	No	The site is close to a loud railway and a busy public carpark.
Does it hold particular significance because of its wildlife?	Partially	The site hosts wildlife and contains many mature trees. Recent informal encampments and litter have likely degraded the quality of the habitat.
Is it local in character? (Is it connected physically, visually or socially to the area?)	No	The site is technically publicly accessible, but there is no formal access to the site. The path that borders the northern edge is contained by barriers. There is high fencing on the eastern and southern edges with informal access at the southwest point. The fact that individuals have established homeless encampments here illustrates the fact that it is isolated from a residential community. The nearest residential communities (Napier Road flats and nearby homes in New Town) are better

		served by Kings Meadow and Palmer Park, respectively. The site itself does not appear to be used by the public (other than those residing informally in tents).
Is it an extensive tract of land?	No	The site is small enough for an LGS designation.

As mentioned in the NPPF, LGS designation will not be appropriate for most green spaces or open spaces. The site is proposed to be protected under the following designations: Major Landscape Feature (EN13) and Area of Identified Biodiversity Interest (EN12).

Mark Worringham

Planning Policy Team Leader

Planning Section | Directorate of Environment and Neighbourhood Services

Reading Borough Council

Civic Offices

Bridge Street

Reading

RG1 2LU

[0118 937 3337](tel:01189373337) (73337 internal extension)

Email: mark.worringham@reading.gov.uk

[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)



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WILLIAMS, CHRISTINE

Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mrs	
First Name	Christine	
Last Name	Williams	
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>		
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

2. 8 CA1B - PART OF READING GOLF COURSE, KIDMORE END ROAD

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes	<input type="checkbox"/>	/	<input type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>		<input type="checkbox"/>	No	<input type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/>		<input type="checkbox"/>	No	<input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

1. Local primary schools and the nearest secondary school are currently oversubscribed. No mention of additional schools
2. Traffic on Kidmore End Rd - incidents which have caused even slightly heavier traffic than usual down Kidmore End Road lead to gridlock back from the junctions of Kidmore End Road and Grove Rd/Peppard Rd. With additional 90-130 dwellings this would almost certainly become a daily occurrence, particularly if families had to drive to get to school(s).
3. Traffic in Caversham - traffic coming from north of the river is already causing numerous issues in Caversham and across the 2 bridges.
4. New Houses in Oxfordshire - there are currently plans for additional houses near the border of Berkshire/Oxfordshire which will add to the above issues.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

1. Additional school(s) or additional provision at local schools.
2. Investigate road layout changes, particularly with the junctions of Kidmore End and Peppard Road and around Grove Rd (one way system?).
3. A more immediate solution to a 3rd bridge over the Thames

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes No /

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan: /

Please keep me informed of all planning policy matters:

WOKINGHAM BOROUGH COUNCIL

**INDIVIDUAL EXECUTIVE MEMBER DECISION
REFERENCE IMD:**

TITLE	Wokingham Borough Council response to the Reading Borough Council Pre-submission Draft Local Plan
DECISION TO BE MADE BY	Executive Member for Strategic Planning and Highways
DATE AND TIME	Wednesday 10 January 2018 – 9.00am
WARD	None specific
DIRECTOR	Interim Director of Environment, Josie Wragg

OUTCOME / BENEFITS TO THE COMMUNITY

To ensure that Reading Borough Council's Local Plan has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

RECOMMENDATION

The Executive Member for Strategic Planning and Highways agrees that Wokingham Borough Council:

- a) Raises a holding objection until such time as:
 - i. the lack of policy and accommodation provision for the Gypsy and Traveller community is addressed within Reading Borough Council.
- b) Supports further discussion and engagement across all authorities in the West Berkshire Housing Market Area regarding Gypsy and Traveller provision

SUMMARY OF REPORT

Reading Borough Council has published their Pre-submission Draft Local Plan. The Pre-submission Draft Local Plan details the draft policies and spatial vision for Reading Borough. This follows from the Issues and Options consultation which ran from 22 January to 7 March 2016 and the Draft Local Plan consultation which ran from 1 May to 14 June 2017.

The report outlines Wokingham Borough Council's response to the unmet housing need in Reading Borough. Reading Borough is within the same Housing Market Area as Wokingham Borough, along with Bracknell Forest and West Berkshire.

The report also considers employment land provision, retail provision, Gypsy and Traveller provision, a policy regarding the Royal Berkshire Hospital, a policy regarding the University of Reading Whiteknights Campus and transport infrastructure which are issues considered in the Pre-submission Draft Local Plan.

Four proposed housing site allocations in the Reading Borough Pre-submission Draft Local Plan are within close proximity to the Wokingham Borough boundary. Wokingham Borough Council therefore welcome the opportunity to discuss further any cross-boundary strategic issues such as any potential traffic and transport impacts associated

with development at these locations.

Background:

Reading Borough Council has published its Pre-submission Draft Local Plan (the Plan) with a consultation running between 30 November 2017 and 26 January 2018. This is a Regulation 19 consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan sets out the long term vision for Reading Borough, up until 2036 and includes proposed development management policies and proposed site allocations.

Reading Borough Council forms part of the West Berkshire Housing Market Area (HMA) with Wokingham Borough Council, West Berkshire Council and Bracknell Forest Council. Reading Borough Council also form part of the Central Berkshire Functional Economic Market Area with Wokingham Borough, Bracknell Forest and the Royal Borough of Windsor and Maidenhead.

Analysis of Issues

Provision of Housing

The Berkshire (including South Bucks) Strategic Housing Market Assessment 2016 (SHMA) identified the Objectively Assessed Need for the Western Berkshire HMA to be 16,077 dwellings in the period 2013-2036, within Reading Borough contribution equating to 699 dwellings per annum.

Since the last draft Plan consultation, Reading Borough Council has taken further analysis which demonstrates that they are able to accommodate more of its own housing need than previously suggested. There remains however a modest shortfall against the overall need.

Policy H1 states that:

“Provision will be made for at least an additional 15,433 homes (averaging 671 per annum) in Reading Borough for the period 2013 to 2036.

The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 644 dwellings that cannot be provided within Reading will be met over the plan period.”

Comparing the assessed need and land supply, the shortfall equates to 644 dwellings over the plan period, or 28 dwellings per year.

In October 2017, a Memorandum of Understanding (MoU) between the four local authorities in the Western Berkshire HMA was signed noting the modest shortfall from Reading and agreeing that the authorities will work together to address this.

No agreement has been reached as to where the shortfall should be addressed and ongoing dialogue is required between Wokingham Borough Council, Bracknell Forest Council and West Berkshire Council. Wokingham Borough Council already has the highest assessed housing need within the Western Berkshire HMA (assessed as 856 dwellings per annum and increased to 894 dwellings per annum through planning appeals). This will need to be reflected within the ongoing discussions.

With Policy H1 being in line with the agreed MoU it is recommended that no objection is raised on this matter.

Provision of Employment

The Central Berkshire Economic Development Needs Assessment suggests that 52,775 sq m of additional office floor space and 148,440 sq m of additional industrial and warehouse floor space are required in Reading Borough (between 2013-2036).

Policy EM1: Provision of Employment Development, states that provision will be made for a net increase of 53,000 – 112,000 sqm of office floorspace and 148,000sqm of industrial/warehouse space. Reading is therefore meeting all of its identified employment need. The Plan also states that Reading can provide up to an additional 60,000 sqm of office floorspace which can be seen as a contribution to the wider needs of the functional economic market area, e.g. should reduce the need for provision elsewhere such as in Wokingham Borough.

Locationally, the Plan guides major office developments (over 2,500 sq m) along the A33 corridor which is considered high-accessibility corridor with a planned new train station at Green Park and mass rapid transit links. Development in this area will have potential for major traffic impact upon Wokingham Borough. Whilst the accessibility of the area is noted, Wokingham Borough Council will require ongoing discussions with Reading Borough to ensure impacts are adequately addressed. Wokingham Borough Council Should also be consulted on any planning applications regarding development in this location.

Provision of Retail

The Western Berkshire Retail and Commercial Leisure Assessment demonstrated that there is a need for comparison goods floorspace of 54,400 sq m by 2036 and in terms of convenience goods floorspace, there is an overprovision of 19,500sqm by 2036.

Within policy RL2, Reading Borough Council intends to consider both the comparison goods and convenience goods floorspace need as a whole and to provide for an overall retail need for up to 34,900sqm of retail and related facilities up until 2036. Reading Borough Council has decided to take this approach because no planning permission is generally required to change the use of a building between convenience and comparison goods with the sale of both types of goods being within

the Class A1 use class for retail). Reading Borough Council are therefore accommodating their overall retail need.

The Western Berkshire Retail and Commercial Leisure Assessment demonstrated that there is a need for 12,900sqm of convenience floorspace in the Winnersh/Woodley / Lower Earley area of Wokingham Borough. This area adjoins the Reading Borough boundary, and the evidence demonstrates that residents living in the East Reading area do shop in convenience goods stores that lie within the Wokingham Borough boundary. It is therefore recommended that Wokingham Borough Council and Reading Borough Council collaborate on this matter to ensure that the identified convenience goods is suitably met.

Site allocations

The Plan proposes the allocation of four residential sites that either border or are in proximity to Wokingham Borough. The four proposed site allocations are:

1. ER1f – Hamilton Centre, Bulmershe Road (13-19 dwellings)
2. ER1e – St Patrick’s Hall, Northcourt Avenue (450-500 bed spaces, student accommodation)
3. SR2 – Land North of Manor Road (680-1,020 dwellings)
4. SR4f – Land South West of Junction 11 of the M4

Policy SR4f concerns land south west of junction 11 of the M4 and sets out that this land, which comprises 3.84ha within Reading Borough, may be required in association with any major development around Grazeley. Though there is no commitment at this stage to take the proposal for development at Grazeley forward, the identification of this land for potential use in association with any development at Grazeley, is considered to be a pragmatic and sound approach. Wokingham Borough Council will need to continue to work with its partner authorities to explore options to make any development that may be planned at Grazeley as sustainable as possible.

In regard to site allocations ER1f, ER1e and SR2, Wokingham Borough Council requests that it is consulted when a planning application is submitted regarding any cross boundary impacts that development at these locations may have.

Gypsy and Traveller Provision

Reading Borough Council published a ‘Gypsy and Traveller, Travelling Showperson and Houseboat Dweller Accommodation Assessment 2017’ (GTAA). It identified a cultural need for 11 pitches in the period 2017/18 – 2021/22, of which 10 pitches are for households that meet the definition of Gypsies and Travellers within the government policy document Planning Policy for Traveller Sites (PPTS). The Longer term cultural need from 2022/23 – 2036/37 was assessed as 6 pitches, of which 0 are for those that meet the PPTS definition.

Policy H13 – Provision for Gypsies and Travellers is a criteria based policy which sets out a series of requirements against which applications for new pitches will be assessed. The PPTS sets out that local plans should include criteria-based policies to provide the basis for decisions in the event that applications for pitches come forward. WBC consider that policy H13 complies with this requirement and is sound.

However, the PPTS also makes clear that local planning authorities should identify a supply of deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets, and also identify developable sites or broad locations of growth for years 6-10 and, where possible, 11-15 years. Reading Borough Council set out in a separate Gypsy and Traveller provision consultation in September/October 2017 that it would be unable to meet any of its identified need within its administrative area. WBC commented on this consultation and re-emphasised the comments made on the Draft Local plan consultation that Reading Borough Council should seek to meet its own need in full. WBC's consultation response also encouraged Reading Borough Council to undertake additional work to identify whether any of its own land assets, some of which were identified as being unavailable at the time of the consultation but potentially suitable for Gypsy and Traveller use, could be further investigated. Wokingham Borough Council also commented that it was open to Reading Borough Council to consider the purchase of additional land to be allocated to meet its identified need.

The current plan does not address Wokingham Borough Council's previous objections. In addition no further explanation of justification has been received. There has been no agreement with the other local authorities as to how this unmet need might be accommodated. In the absence of any agreed strategy for meeting this need, it is recommended that this aspect of the Plan is unsound as it has not been positively prepared as regard meet identified needs or adequate justification provided as to why this cannot be achieved.

Policy WR4 identifies the potential for a site at Cows Lane to be delivered to accommodate 5 transit pitches. Wokingham Borough Council responded to the September/October consultation on Gypsy and Traveller provision stating that it had no objection to the suitability of this site for transit pitches. However, Wokingham Borough Council also stated that consideration should be given to use in part of the site for permanent pitches therefore being a mixed use transit and permanent scheme. This would likely require formal delineation of the transit and permanent elements. No such mixed use is proposed through policy WR4. Wokingham Borough Council does not consider this policy in itself to be unsound, given that it proposes to meet the full identified need for transit pitches, but notes that the opportunity to investigate mixed use has not been taken forward to help address meeting permanent Gypsy and Traveller pitch need.

Royal Berkshire Hospital

Policy ER3: Royal Berkshire Hospital is a flexible policy which supports the future development of the site for healthcare provision.

Wokingham Borough Council notes that within policy ER3: Royal Berkshire Hospital, there is reference to a potential long-term proposal for moving the hospital to a new

site within the Reading area. The Royal Berkshire Hospital serves residents across Berkshire and beyond, and therefore Wokingham Borough Council requests that it is engaged with should any plans come forward to relocate the hospital.

If the hospital does relocate in the future, there could be an opportunity for the site to be redeveloped to provide residential development which could contribute towards meeting the wider needs of the Western Berkshire HMA. The site is not currently within Reading Borough Council's assessed housing capacity.

Whiteknights Campus

Policy ER2: Whiteknights Campus, supports the continued evolution and development of the University of Reading campus, and includes a set of criteria which future development will accord with. These are:

- *Areas of wildlife significance and current or potential green links will be retained or enhanced, and not detrimentally affected by development, including through light effects;*
- *The safety of those using the campus will be maintained or enhanced;*
- *There will be no significant detrimental impact on the amenity of neighbouring residential properties; and*
- *The loss of undeveloped areas on the site will be weighed against the benefits of development to the wider community.*

The proposed policy in the Plan is similar to the Whiteknights Campus policy within Wokingham Borough Council's Managing Development Delivery Local Plan. Wokingham Borough Council and Reading Borough Council should continue to work together to ensure a consistent approach to development within the Whiteknights Campus.

Transport infrastructure

Policy TR2: 'Major Transport Projects' sets out a number of schemes whose implementation will be prioritised through the Local Transport plan and successor documents and sets out that land required will be safeguarded through the Plan for relevant schemes. Wokingham Borough Council welcomes the commitment to all of the schemes set out in policy TR2. The identified schemes which would directly affect Wokingham Borough, and which are shown on Figure 4.8, are: Mass Rapid Transit; Park and Ride; Crossing of River Thames; and National Cycle Network Route 422. Wokingham Borough Council supports these schemes.

At the last plan stage the MRT route was only shown along the A3290 towards Winnersh and Wokingham. Following our comments, the Plan now shows an additional MRT route using the A4 towards Woodley. This is welcomed however we would wish for the Plan to recognise the potential extension of this route further eastwards and Wokingham Borough Council would continue to welcome additional engagement on this matter.

The development of a Park and Ride corridor at Thames Valley Park within Wokingham Borough is supported. This will require on-going co-operation between the two authorities.

Wokingham Borough Council also welcomes reference within TR2 to Crossing of the River Thames and the potential crossing route for this is shown in figure 4.8. Wokingham Borough Council is leading the in on-going dialogue with Reading Borough Council, Oxfordshire County Council, South Oxford District Council and the Thames Valley Berkshire Local Enterprise Partnership regarding cross-border transport capacity improvements such as the bridge. Additional highways capacity to the east of Reading will alleviate traffic congestion and have economic benefits for the wider region. WBC anticipates continuing to work with Reading Borough Council and wider authorities on this and other relevant strategic infrastructure planning matters in the future. WBC notes that a route would likely not include land within Reading Borough, but is likely to involve land in South Oxfordshire and Wokingham Borough. (as is outlined in Strategic Outline Business Case found on the Wokingham Borough Council website here: <http://www.wokingham.gov.uk/parking-road-works-and-transport/transport-and-roads-guidance-and-plans/?categoryesct191f252ff-550d-4cfa-a838-92ef2cb5f83c=10642>). Therefore no land within Reading Borough has been safeguarded on the policies map for this purpose. The lack of any safeguarded land is not considered to render the policy unsound, but additional close working with Reading Borough Council will be needed moving forward.

Section 6 of the Plan concerns the South Reading Area. This section refers to the potential development at Grazeley that has been presented in the West of Berkshire Spatial Planning Framework as a possible area for a new settlement of around 15,000 houses. There is no commitment at this stage to take the proposal for development at Grazeley forward. The land lies within Wokingham Borough and West Berkshire District areas but would have strong links to Reading. One of the key principles for the south Reading area, set out at paragraph 6.2.1d of the plan, recognises the importance of enhanced transport connections to any development at Grazeley, should this occur. WBC welcomes this inclusion within the plan. Figure 6.1 includes an indicative MRT route across the M4 from the Grazeley area towards the existing Park and Ride at Mere oak which is also welcomed.

Wokingham Borough Council considers the strategic transport elements of the Plan to be sound. Wokingham Borough Council would welcome on-going co-operation on transport schemes, including improved bus services, which will enhance connections between Reading Borough and Wokingham Borough.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

The Council faces severe financial challenges over the coming years as a result of the austerity measures implemented by the Government and subsequent reductions to public sector funding. It is estimated that Wokingham Borough Council will be required to make budget reductions in

excess of £20m over the next three years and all Executive decisions should be made in this context.

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	N/A	N/A	N/A
Next Financial Year (Year 2)	N/A	N/A	N/A
Following Financial Year (Year 3)	N/A	N/A	N/A

Other financial information relevant to the Recommendation/Decision

None anticipated

Cross-Council Implications (how does this decision impact on other Council services, including property and priorities?)

Decisions in Reading Borough on the location of sites for residential and other types of development could affect how the authority needs to resolve impacts on services such as transport, education, etc. within the borough.

SUMMARY OF CONSULTATION RESPONSES

Director of Corporate Services	No comments
Monitoring Officer	No comments
Leader of the Council	No comments

Reasons for considering the report in Part 2

n/a

List of Background Papers

Information published by Reading Borough Council relating to the Pre-Submission Draft Local Plan– see <http://www.reading.gov.uk/newlocalplan>

Contact Vanessa Rowell	Service Development Policy and Planning
Telephone No 0118 974 6458	Email Vanessa.Rowell@wokingham.gov.uk
Date 7 December 2017	Version No. 4

WOODLEY TOWN COUNCIL

From: Linda Matthews <linda.matthews@woodley.gov.uk>
Sent: 10 January 2018 16:00
To: Planning Policy
Subject: Reading Borough Pre-Submission Draft Local Plan

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

Reading Borough Pre-Submission Draft Local Plan

The Woodley Town Council Planning Committee has considered the Reading Borough Pre-Submission Draft Local Plan and had no comments to make on the proposals.

Kind regards

Linda Matthews
Committee Officer
Woodley Town Council
The Oakwood Centre, Headley Road
Woodley, Berkshire, RG5 4JZ
Tel: 0118 9690356

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WYCOMBE DISTRICT COUNCIL



Enquiries to: Planning Policy Team
Email: Emily.Hadley@wycombe.gov.uk
Direct line: 01494 421029
Date: 26 January 2018

WYCOMBE
DISTRICT COUNCIL

Planning Policy Team
Reading Borough Council
Civil Offices
Bridge Street
Berkshire
RG1 2LU

Re: Reading Borough Local Plan – Pre-Submission Draft Local Plan

Dear Sir or Madam,

Thank you for providing Wycombe District Council the opportunity to respond to the Reading Borough Local Plan Pre-Submission Draft Local Plan. It is noted that Reading Borough Council has unmet housing need which is to be met within the West Berkshire HMA, this has been confirmed by the Memorandum of Understanding signed by the six Berkshire unitary authorities in October 2017. Wycombe District Council have no other comments to raise.

We welcome this Local Plan update and look forward to future cooperation on strategic matters.

Kind regards,

Emily Hadley

Planning Policy Officer
Planning & Sustainability

Planning and Sustainability - Penelope Tollitt, Head of Service

Wycombe District Council, Queen Victoria Road, High Wycombe, Bucks HP11 1BB

Tel: 01494 461000 DX 4411 High Wycombe -1 www.wycombe.gov.uk Twitter: @wycombedc

