

# READING BOROUGH EMERGING LOCAL PLAN

Statement of Common Ground between the University of Reading (The UoR) and  
Reading Borough Council (The Council)

November 2018



## **INTRODUCTION**

- 1.1 The Statement of Common Ground (SoCG) has been prepared jointly by Barton Willmore on behalf of the University of Reading (UoR) and Reading Borough Council (the Council). This follows the request of the Planning Inspector (Louise Gibbons) holding proceedings for the examination of the submitted version of the emerging Reading Local Plan.
- 1.2 The UoR's main Whiteknights Campus is partially within Wokingham Borough Council's (WBC) area. A number of other UoR-owned and operated sites are also within Wokingham. As this SoCG is in response to a specific request from the Inspector, WBC are not a party to it. However, WBC have been provided with a copy, and will be a key partner in moving forward with any agreed actions.
- 1.3 There are four remaining matters of uncommon ground, which are: the capacity of bedspaces on site ER1e (St Patrick's Hall, Northcourt Avenue); the wording and sustainability appraisal of Policy H12, though the parties have agreed proposed changes to the supporting text; the need for increased flexibility in Policy CC3; and the need for increased flexibility in Policy EN14. The differences are in the section on each matter alongside the common ground which has been reached on all other matters arising from the University's representations to the emerging draft Local Plan.
- 1.4 The SoCG follows the following sub-sections;
- a) Sustainability Appraisal
  - b) Housing Land Supply and Site Capacity
  - c) Cross Cutting Policies
  - d) Environmental Policies
  - e) Housing Policies (including draft Policy H12)
  - f) Issue 13 – Caversham and Emmer Green
  - g) Issue 14 – East Reading

### **Sustainability Appraisal**

- 1.5 The SoCG addresses;
- how Policy H12 has been tested by the SA

### **Housing Land Supply and Site Capacity**

1.6 The SoCG covers the following matters;

- The wording of draft Policy ER1e in terms of the capacity of the site;
- Agreement on the wording of draft Policy ER1c to consider the capacity of the site and the potential for inclusion of student accommodation and academic uses.

### **Cross-cutting Policies**

1.7 The SoCG covers the following matters;

- The wording of Policy CC3 to ensure appropriate levels of flexibility;
- The reference to contributions to monitoring in Policy CC9.

### **Environmental Policies**

1.8 The SoCG covers the following matters;

- The wording of Policy EN14 to ensure appropriate levels of flexibility;
- The request for additional information to support the requirement of Policy EN17.

### **Housing Policies**

1.9 The SoCG agrees that;

- Policy H5 would not apply to student accommodation.

1.10 Specifically in relation to draft Policy H12 and the evidence submitted by the UoR, the SoCG considers the following issues, and agrees a way forward for considering these issues;

- The growth in student numbers from the UoR and the need for further student accommodation;
- The capacity of the UoR campus to accommodate further student accommodation and the scope of opportunities on adjacent land to accommodate student accommodation;
- The benefits of PBSA versus HMO student accommodation;
- The benefits PBSA can make in terms of decreasing HMO demand from students;
- Any proposed changes to the supporting text to Policy H12;

- Identifies the remaining uncommon ground between the parties in relation to Policy H12.

1.11 In relation to draft Policy OU1, the SoCG agrees on;

- Proposed changes to Policy OU1 to reflect that not all development by the UoR within existing campus locations would generate an increase in student numbers.

### **Caversham and Emmer Green**

1.12 The SoCG will agree wording for draft Policy CA1a, as set out within the UoR Hearing Statement for Issue 13, agreed in principle with the Council prior to the commencement of the EIP hearing sessions.

### **East Reading**

1.13 The SoCG agrees the following;

- the wording of Policy ER2, in order to be consistent with changes to policy OU1;
- changes to the boundary of the areas of biodiversity importance on the Proposals Map, to the immediate East of the Mackinder Halls development.

## **SUSTAINABILITY APPRAISAL**

- 2.1 The UoR made representations on the **Sustainability Appraisal of Policy H12 (Student Accommodation)** at Pre-Submission stage, and reiterated these points in the hearings on 25<sup>th</sup> September, specifically that option iii appraised does not appear to match the policy as drafted.
- 2.2 The Council's response remains as set out during the hearings on 25<sup>th</sup> September, and in the response to Pre-Submission representations from the UoR and Studios (see pages 400-409 of the Statement of Consultation on Pre-Submission Draft Local Plan, LP006), that there had been a mislabelling of the title of the option in the Sustainability Appraisal, and that it should have read 'adjacent to' rather than 'close to'. However, the actual appraisal relates to the policy as proposed.
- 2.3 In terms of whether a distinct option should be appraised that would reflect the wording changes to H12 proposed by the UoR, i.e. that student accommodation should be located on university or accommodation sites or other sustainable locations with convenient access, the Council maintains its position expressed in the hearings, that there is no practical difference between this and the 'no policy' option, because at the current time, without locational policy, student accommodation is being delivered close to the university and in the town centre in any case.
- 2.4 The UoR therefore maintains its position on the Sustainability Appraisal of H12, because the Council is not able to evidence that this was the way in which the draft policy was assessed, and the Council accepted in the Examination hearing that there was a difference between 'adjacent' and 'close to'. Both parties note that any main modifications to this policy or its supporting text will need to be supported by a review of the Sustainability Appraisal in any case.

## **HOUSING LAND SUPPLY AND SITE CAPACITY**

- 3.1 In relation to site **ER1e (St Patrick's Hall, Northcourt Avenue)**, the parties agree that the St Patricks Hall site is the only specific UoR-owned site that has been identified by the parties as able to come forward immediately to meet a large part of the urgent need for an additional 1,000 bed spaces to allow UoR to accommodate first year students and to support the University in meeting its first-year guarantee (detailed at paragraph 6.9 of this SoCG).
- 3.2 The UoR has proposed that the dwelling capacity set out in the policy should be increased to 654 additional bedspaces. This would be in line with planning application 172045. However, on 23<sup>rd</sup> February 2018, this application was refused by Reading Borough Council. The Planning Applications Committee Report and Minutes have been added to the Examination Library as EC020, and these contain the reasons for refusal. An appeal was lodged on 7<sup>th</sup> September 2018.
- 3.3 The parties have not been able to reach agreement on changes to the dwelling capacity on this site, and both parties maintain their positions set out in Pre-Submission comments/Council responses to comments, responses to examination issues (see EP007 and EC005) and as stated during the hearing sessions themselves. The University seeks to reflect discussions at hearing session 3 and proposes that the upper range of bed spaces is increased to 654. The lower range would remain, indicating a broader potential range that is to be tested through the planning application process. The Council is concerned that the case for this level of development has not been made, as illustrated by the recent refusal. The parties await the outcome of the planning appeal. The University's concerns regarding the Local Plan as drafted with regard to the capacity for St Patricks Hall are set out in Appendix 1.
- 3.4 In relation to site **ER1c (Land rear of 8-26 Redlands Road)**, in discussions at the hearings on issue 3 on 26<sup>th</sup> September, the UoR argued that this site would be capable of accommodating up to 20 dwellings. In discussions on issue 14 on 5<sup>th</sup> October, this was reiterated, and it was further argued that there was potential for student accommodation or academic use within the site. The Council has considered the analysis of the site within the Campus Capacity Study submitted alongside the UoR's Response to Issue 7 (EP017), and, although it is not in a position to endorse specific options presented in that document, it agrees that it has been demonstrated that there is potential to accommodate up to 20 dwellings, and that, given that the site contains existing student

accommodation, there should be flexibility for student accommodation or other university uses within the site boundaries. Both parties therefore agree that the following change should be made to policy ER1c.

Document Reference	Reason	Change
Page 207 Policy ER1c	To reflect the potential for continuing use associated with the University as proposed in the University of Reading's Response to Issue 3 and in light of the University Capacity Study demonstrating a higher site capacity	<p><b>ER1c LAND REAR OF 8-26 REDLANDS ROAD</b></p> <p><b><u>Development for residential, with potential for student accommodation or university uses reflecting the existing student accommodation use on the northern part of the site.</u></b></p> <p><b>Development should:</b></p> <ul style="list-style-type: none"> <li>• <b>Make a positive contribution to the conservation area and to the setting of adjacent listed buildings;</b></li> <li>• <b>Take account of potential archaeological significance;</b></li> <li>• <b>Retain the wall fronting Morgan Road; and</b></li> <li>• <b>Retain mature trees on the site and provide for a north-south green link, which will reduce the amount of the site that can be developed and will particularly limit development behind 14-24 Redlands Road.</b></li> </ul> <p><b>Site size: 0.74 ha 12-<del>18</del><u>20</u> dwellings</b></p>



## CROSS-CUTTING POLICIES

4.1 In relation to **Policy CC3 (Adaptation to Climate Change)**, the parties have not reached agreement on the need for changes to be made. The Council maintains its position that no change is necessary to make the policy sound. The UoR maintains its position that a change is required to allow sufficient flexibility, as discussed during the hearings session on Wednesday 26th September. The UoR considers that the following change would resolve the objection to this policy.

Document Reference	Reason	Change
Page 23 Policy CC3	To reflect circumstances where this may not be achievable as discussed at hearings on 26 September.	<p><b>CC3: ADAPTATION TO CLIMATE CHANGE</b></p> <p><b><i>All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development <u>wherever possible</u>:</i></b></p> <ul style="list-style-type: none"> <li>• <b><i>New buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;</i></b></li> <li>• <b><i>Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc;</i></b></li> <li>• <b><i>Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions; and</i></b></li> <li>• <b><i>All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change.</i></b></li> </ul>

4.2 In relation to **Policy CC9 (Securing Infrastructure)**, the UoR's Response to Issue 4 (EP011) reiterated the UoR's representations at Pre-Submission stage in proposing a change to the requirement for contributions towards monitoring, in line with a 2015 High Court decision. As discussed during the hearings session on Wednesday 26th September, the Council agrees that deletion of this requirement would reflect that decision. Both parties therefore agree that the following change should be made to policy CC9. This change would resolve the UoR's objection to this policy.

Document Reference	Reason	Change
Page 32 Policy CC9	To reflect most up-to-date case law, as set out in University of Reading's Response to Issue 4 (EP011)	<del><i>“Developers are required to contribute towards the ongoing local authority costs of monitoring the implementation and payment of planning contributions.”</i></del>

## ENVIRONMENTAL POLICIES

5.1 In relation to **Policy EN14 (Trees, Hedges and Woodlands)**, the parties have not reached agreement on the need for changes to be made. The Council maintains its position that no change is necessary to make the policy sound. The UoR maintains its position that a change is required to allow sufficient flexibility, as discussed during the hearings session on Thursday 27<sup>th</sup> September. The UoR considers that the following change should be made to ensure that the policy is sufficiently flexible. This change would resolve the UoR's objection to this policy.

Document Reference	Reason	Change
Page 55 Policy EN14	To reflect circumstances where tree planting may not be possible on or off site as discussed at hearings on 27 September.	<i>“New development shall make provision for tree retention and planting <u>where possible</u>, within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change.”</i>

5.2 The UoR objected to the requirement in **Policy EN17 (Noise-Generating Equipment)** for the noise source specific rating of new equipment to be at least 10dBA below existing background levels. The Inspector has requested additional information on the reason for this level, and both parties understand that further consideration of this policy will be dependent on that information. No changes are therefore agreed in this Statement.

## **HOUSING POLICIES**

### **Policy H5 – Standards for New Housing**

- 6.1 In relation to **Policy H5 (Standards for New Housing)**, both parties agree that in terms of the housing standards, paragraph 4.4.36 confirms that Policy H5 would not apply to student accommodation.

### **Policy H12 – Student Accommodation**

- 6.2 There was considerable discussion during the Examination hearings around the issue of provision of student accommodation. This included substantial information submitted within responses to examination issues. This matter was the main reason that the Inspector requested that a Statement of Common Ground be completed between the UoR and the Council.
- 6.3 The UoR's position in summary is that there is a substantial existing shortfall in purpose built student accommodation (PBSA), which is expected to worsen with growth in student numbers. The UoR therefore considers that the Council's draft policy position in H12, which directs new student accommodation to existing university or student accommodation sites in the first instance, is unduly restrictive and there should be greater flexibility to include other sustainable locations which are accessible to the relevant institution. New PBSA can make a contribution to housing supply through releasing existing homes occupied by students into the general market.
- 6.4 The Council's position in summary is that, given the limited range of potential development sites to meet general housing needs, exacerbated by the fact that the Local Plan already fails to meet the whole objectively assessed need for housing, there is significant concern about loss of housing sites to student accommodation. This is a trend which is already apparent in parts of Reading, particularly the town centre. The Council considers that the quantitative need for new PBSA is not as clear-cut and consistent as for general housing, and that housing ought to have priority on those sites where there is likely to be competition. Whilst new PBSA can free up existing homes, it cannot make as great a contribution to housing supply as general housing on those sites, and makes no contribution to the Borough's significant affordable housing needs. The Council's view is that sufficient flexibility already exists within policy H12 to demonstrate a need for student accommodation that cannot be met on existing university or accommodation sites on a case-by-case basis.

- 6.5 The UoR submitted two documents as appendices to its Response to Issue 7 (EP017), an Accommodation Strategy Part 1 and a Campus Capacity Study, and the Inspector specifically asked that this Statement covers those two documents.

***Accommodation Strategy Part 1 – Gap Analysis, September 2018 – Cushman and Wakefield***

- 6.6 The Accommodation Strategy Part 1 – Gap Analysis (referred to as URAS here) seeks to outline the scale of undersupply of student accommodation and determine the best approach to meeting existing and forecast demand.
- 6.7 The University is a global top 200 UK institution which attracted 14,005 full-time students in 2016/17 and has grown student numbers by 22% over the last 5 years and contributes some £650m annually to the local economy and employs over 3,700 people. This growth has been accelerating since changes to the tuition fee system and the removal of Student Number Controls which has created competition for students, coupled with record numbers of 18-year olds applying for higher education places.
- 6.8 The URAS identifies that student numbers have grown 28% between 2007/8 and 2016/17 (over four times the 5% national average), and that over recent years, UoR accommodation has experienced 100% occupancy, with a significant waiting list. In terms of student origins, in 2016/17 28% of the student body came from outside the UK, reflecting the importance of the University's global engagement strategy to maintain and grow its international reputation. For the same year, the University recruited 74% of its students from outside the South East.
- 6.9 The lack of available student accommodation to meet this growth means that the University is unable to meet its first-year student guarantee (students will be guaranteed a place in a hall of residence if they are a new undergraduate or postgraduate (i.e. not a returning student) who confirms the University of Reading as their firm (first) choice institution, and applies for accommodation before the 1st August in the year of entry and who makes all terms of their academic offer by the 31st August in the year preceding entry). Over 1,000 first year students have been unable to secure a bed in 2017/18. Across all years of study, for 2017/18, 5,000 students were unable to find a bed in PBSA, although it should be noted that this does not take account of whether PBSA would be the preference of all of those students. Lack of supply, in particular for first year students, risks damaging the University's reputation over the longer term, and causing harm to the

student experience of those who are forced to seek often low-quality HMO accommodation.

- 6.10 The Council has not been in a position to verify the exact figures taking account of existing supply and the planning pipeline, but does not have particular reason to doubt the general scale of existing shortfall identified. It should be noted that the shortfall mainly results in students housed within the private rented housing market, including within HMOs.
- 6.11 In terms of future growth, p46 of the URAS states that the UoR expects to grow from just over 16,000 students in 2017/2018 to 21,000 students by 2028. This represents a 31% growth over ten years. This growth would mean that the shortfall in meeting the first year student guarantee would rise to over 2,000 students by 2020/21 and over 3,000 by 2028/29. This widening gap between demand and supply is illustrated on p47 of the URAS. Moreover, an increased number of students without an increased supply of appropriate student accommodation would inevitably increase demand for HMOs. Across all years of study, by 2028, the number of students across all years who are unable to be accommodated within PBSA would rise to 12,865. Without enough purpose-built student accommodation, this will further increase HMO demand. As well as having very substantial implications for the demand for accommodation in Reading and Wokingham, such growth would mean a wide range of other significant implications for both authorities.
- 6.12 These growth expectations, or anything on this scale, had not been highlighted to the Council before the submission of the UoR's Response to Issue 7 in September 2018, and as such were not anticipated in the Local Plan. The Council has strong concerns about the implications of this level of growth, as expressed by the Council during the hearing sessions on Issue 7. The Council's views on the URAS are set out in Appendix 2. Appendix 2a does not constitute an agreed statement but is the Council's response to the Capacity Study and has been included for completeness alongside a clarification response at Appendix 2b provided by the University which again does not constitute an agreed statement. The parties agree that it is not reasonable to expect that this version of the Local Plan could take account of that level of growth.
- 6.13 Therefore, the Council and UoR, along with Wokingham Borough Council, need to continue to work together outside the Local Plan process to test these growth expectations and examine their implications, including consideration against the policy position in policy OU1 of the Local Plan which expects new academic development which generates a demand for additional student accommodation to be supported by appropriate growth in

accommodation. The UoR and Council, as well as WBC, will need to meet on a regular basis, at least twice a year, to keep these matters under review. Such joint working could aim towards an agreed document, such as a vision or agreed set of principles for the UoR's role in the town.

- 6.14 The Council and UoR agree to monitor the most up-to-date shortfall of PBSA. The Council's Annual Monitoring Report (AMR), published in December each year, provides an opportunity to identify the amount of bedspaces in PBSA in Reading Borough during the monitoring year, and compare this to the number of students enrolled for the academic year, as provided by UoR (and other local higher education providers), as well as the number of new students that would arise from permitted academic floorspace. This would include the number to which the UoR's accommodation guarantee would apply. The AMR could then provide part of the basis for assessing the clause within H12 regarding whether there is a need which cannot be met in the preferred locations, although it will also need to be considered alongside future growth.
- 6.15 Over time, the monitoring of the shortfall will feed into the five-yearly review of the Local Plan, and the Council will need to consider whether it results in a need to revise policy H12. This decision will also take account of the ongoing discussions around proposed UoR growth levels, as well as its location and timescale for delivery, including any agreed outputs from those discussions.
- 6.16 With regard to the existing difficulties in accommodating students which have been identified in the URAS, both parties agree that it would be reasonable for the supporting text to policy H12 to refer to the headline figures set out, namely the inability to fulfil the first year accommodation guarantee and around 1,000 first-year students being unable to secure a bed in 2017/18, and the overall amount of students currently not in PBSA of around 5,000.
- 6.17 The following change is therefore proposed by both parties to address this.

Document Reference	Reason	Change
Page 94-95 Paragraphs 4.4.95- 4.4.98	To be more precise about existing need for student accommodation	"4.4.95 Reading has a strong student population, drawn by the University of Reading and also by Reading College. This population brings many benefits to the area, in terms of supporting services and facilities, and means a strong supply of well-qualified people, many of whom remain in the Borough after graduation and make a major contribution to its economic success. It is important that sufficient accommodation is provided to enable students to live close to where they study. <a href="#">The Council particularly</a>

		<p><a href="#">recognises the benefits of purpose-built student accommodation where there is a partnership arrangement with a further or higher education institution and where it offers accommodation that meets the needs of students in terms of facilities, convenience to places of study and in terms of the cost of accommodation.</a></p> <p>4.4.96 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 it should not result in the need for significant new accommodation. More recent evidence from the University indicates that this growth, <a href="#">underpinned by changes to the tuition fee system and the removal of student number controls, will have</a> indeed generated a need for new accommodation. <a href="#">In 2016/17, 74% of students were from outside the South East, and 28% were from outside the UK, and these groups are particularly reliant on student accommodation. There is current shortfall in University accommodation of around 1,000 bed spaces for first year students and, across all years of study, for 2017/18, 5,000 students were not housed in purpose built student accommodation.</a></p> <p><a href="#">4.4.97</a> It is considered that this <a href="#">existing</a> need should mainly be met on campus or through reconfiguration and redevelopment of existing halls of residence, subject to considerations of amenity and character. <a href="#">The St Patrick's Hall site has been identified in policy ER1e as such a proposed site. Its delivery will help to address the student guarantee (where first year students who have the University as their first choice are guaranteed accommodation). Additional accommodation beyond this will need to demonstrate why it cannot be met on those sites.</a></p> <p>4.4.978 However, the need for student accommodation is highly dependent on any expansion of the University. <del>Whilst the University's plans for the next five years are clear, the intentions up to 2036 are less so, and there is therefore potential for change in later parts of the plan period.</del> <a href="#">The University has expressed intentions for significant growth in student numbers up to 2028. Where such growth requires planning permission, it will need to be tested against policies OU1 and, depending on location, ER2, to ensure it can be supported by appropriate student accommodation.</a> The need for future expansion of accommodation will therefore need to be kept under review.</p> <p>4.4.989 The provision of new student accommodation needs to be balanced against other types of housing. <del>Whilst it</del> <a href="#">is likely that purpose built student housing, where it is affordable to those students currently in HMOs, can free up some existing homes to meet more general needs, and there is evidence that in those recent years where numbers</a></p>
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		<p><u>of students in HMOs have dropped, this has coincided with the opening of large new on-campus student accommodation blocks. However, the Council considers that</u> 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, including affordable housing. Development for students should therefore be <del>limited to</del><u>prioritised towards</u> established student locations, unless a specific need for a development in a certain location can be clearly demonstrated.”</p>
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***Campus Capacity Study, September 2018 – Barton Willmore***

- 6.18 The Campus Capacity Study seeks to quantify the potential capacity of the University’s existing sites to accommodate additional academic and residential development. Its conclusions are that, in capacity terms, but without detailed design work, it is possible (subject to detailed design and layout) to accommodate c.1,900 new student bedrooms on University landholdings, on or adjacent to the London Road and Whiteknights campuses including the identified St Patricks site. The potential sites identified on the Whiteknights campus will be considered for future development, however many of the sites are not immediately available and will form part of the University’s longer-term future planning for the campus.
- 6.19 At this stage, there is not a full agreement on the conclusions of the Campus Capacity Study in terms of the amount of development that could be accommodated. The Council’s views on the Study are set out in Appendix 3. Appendix 3 does not constitute an agreed statement but is the Council’s response to the Capacity Study and has been included for completeness.
- 6.20 However, both parties agree that, whilst there is significant remaining capacity on the Whiteknights campus for additional development, the constraints of the site, including open space, protected trees and habitats and heritage assets, mean that there are limits to this capacity.
- 6.21 However, both parties recognise that to accommodate the level of growth to 2028 envisaged in the URAS, levels of growth around which the Council has significant concerns as expressed in paragraph 6.12 and at the hearings, it is unlikely that there would be capacity within or adjoining existing University campus and student accommodation sites to provide the necessary level of supporting student accommodation.

- 6.22 Both parties also agree that the Campus Capacity Study forms a valuable first step towards the development of a replacement Whiteknights Development Plan or framework for the University campus, and agree to work together along with Wokingham Borough Council to work towards such a document.

***Evidence on the Link between PBSA and HMOs***

- 6.23 During the hearings on 28<sup>th</sup> September, the Inspector requested that evidence be provided to demonstrate the relationship between the provision of purpose built student accommodation (PBSA) and the number of students living in houses in multiple occupation (HMOs). This information is largely set out within the URAS, an appendix to the UoR's Response to Issue 7.
- 6.24 In summary, the information submitted by the UoR details that significant recent growth and the limited availability of purpose-built student accommodation that students can be offered has increased pressure on the local housing market through greater demand for HMO accommodation. Consequently, the number of students living in HMOs has grown by 750 in the past two years. Since 2011/12, there has been an increase of at least 915 students living in HMOs. Figures for total recorded students residing in HMOs (as not all HMOs are officially registered with the Council) during 2016/17 reached just under 1,600 students (911 HMO registered properties).
- 6.25 Given the notable impacts on a local community from HMOs and the projected significant growth in HMO occupation, it is useful to highlight data that tests whether the number of students in HMOs can be reduced through the efficient provision of beds within purpose-built accommodation (i.e. increased density of students within effectively managed accommodation). On page 41 of the URAS this theory is tested. Only in two years between 2010/11 and 2016/17 were student numbers in HMOs found to have dropped. These two reductions coincided with the opening of two large student accommodation blocks (Childs Hall in 2012 with 594 beds, and Bridges Hall in 2014/15 with 649 beds), demonstrating a clear student preference for purpose-built student accommodation, where it is available.
- 6.26 The Council wishes to qualify the comments above, in that in its view the relationship between PBSA and HMO occupation depends in large part on the form and cost of PBSA accommodation. This is explored in more depth in the Council's views on the URAS in Appendix 2a.

- 6.27 Therefore, in order to reduce any undesirable impacts from students residing in HMOs, free up existing HMO housing stock to the open market and effectively manage student behaviour, there is a clear need to support the provision of purpose-built student accommodation on appropriate sites providing a range of different types of accommodation at different cost levels to the students that need accommodation. The Council's view is that these benefits are in large part related to affordability of the PBSA.
- 6.28 Both parties agree that there is a clear relationship between the two types of accommodation, and that it is clear that, where there is insufficient provision of PBSA, there would tend to be a greater number of students in private housing including HMOs, with knock-on effects for provision of family housing. The Council is concerned with the amount of small HMOs in the C4 use class in close proximity to the UoR's two campuses, and this was the main reason for making an Article 4 Direction covering parts of Katesgrove, Park and Redlands wards, in 2012. This aspect of the discussion is not therefore a matter of general dispute between the parties, although the Council is keen to emphasise that it considers that the relationship is dependent on matters such as rental levels.

### *Overall Conclusions on Policy H12*

- 6.29 Both the UoR and Council maintain their positions in respect of the approach of **Policy H12 (Student Accommodation)**, as articulated in Pre-Submission comments/Council responses to comments, responses to examination issues (see EP017 and EC009) and as stated during the hearing sessions themselves. These positions do not need to be summarised here. As such, there is no agreement on changes to H12, other than to the supporting text outlined above.
- 6.30 However, both parties agree to continue to work together to understand the implications of any growth of UoR and its implications for Reading, not only in terms of student accommodation but for all other matters.

### **Policy OU1**

- 6.31 In relation to **Policy OU1 (New and Existing Community Facilities)**, and as discussed during the hearings session on Tuesday 2<sup>nd</sup> October, the parties agree that a change can be made to ensure that the policy takes account of instances where new University development would not result in a need for additional accommodation. This change would resolve the UoR's objection to this policy.

Document Reference	Reason	Change
Page 115 Policy OU1	To take account of development that would not generate a material need for new accommodation as discussed at hearings on 28 September.	<p><b>“OU1: NEW AND EXISTING COMMUNITY FACILITIES</b>  <i>Proposals for new, extended or improved community facilities will be acceptable, particularly where this will involve co-location of facilities on a single site. Proposals for on-site intensification of important facilities, such as schools and healthcare uses, will be supported, subject to other policies in the plan. Proposals for additional development for further and higher education will only be acceptable where it can be demonstrated that <u>it would not lead to a material increase in the need for student accommodation, or that additional students can be housed in-it will be supported by an appropriate increase in existing or planned student accommodation.</u>”</i></p>
Page 116 Paragraph 4.7.9	To reflect changes to Policy OU1 set out above.	<p>“However, it must be recognised that further and higher education expansion can put pressure on the housing market, <del>through students being housed in existing dwellings, or through new student accommodation on sites that could otherwise be used to address the general housing need.</del> Given the scale of the need for new homes in Reading, this must be carefully managed. Therefore, applications for academic development that would <del>bring additional students to live in Reading must lead to a material increase in additional students needing student accommodation should</del> be <del>paired with</del> supported by an <del>corresponding</del> appropriate increase in <del>dedicated</del> existing or planned student accommodation. This should be <del>on existing campuses or existing student accommodation sites, considered</del> in line with policy H12.”</p>

## CAVERSHAM AND EMMER GREEN

7.1 The UoR suggested a change in their Response to Issue 13 (EP030) regarding site **CA1a (Reading University Boat Club)**, to ensure that the policy allows for the retention of the boat club. As stated in the hearings on 4<sup>th</sup> October, the Council agrees that the change allows for the appropriate level of flexibility. Both parties agree that the change proposed in the UoR's response, as set out below, should be made.

Document Reference	Reason	Change
Page 198 Policy CA1a	To allow for retention of the Boat Club, as proposed in the University of Reading's Response to Issue 13	<b>"CA1a READING UNIVERSITY BOAT CLUB, THAMES PROMENADE</b> <b><i>Development for residential, <del>subject to relocation of the boat club.</del> Where retention of the existing boathouse is not proposed, development will only be permitted subject to its relocation or clear demonstration that its loss is justified in line with policy RL6 or national policy."</i></b>

## EAST READING

- 8.1 The UoR has proposed changes to **paragraph 9.2.7** and **Policy ER2 (Whiteknights Campus, University of Reading)** that would be in line with the UoR’s proposed changes to policy H12. However, as no agreement has been reached on changes to policy H12, no agreement has been reached on these additional changes.
- 8.2 In addition, the University proposed a change to Paragraph 9.3.2 to omit reference to indicative maximum capacity. This would be a change that would need to be reflected in the supporting text to similar policies across the document. As requested by the Inspector, the Council has produced a note on the approach to dwelling ranges (EC021), which sets out the Council’s preferred approach. This issue is not therefore agreed as part of this SoCG.
- 8.3 The University considers that the omission of the indicative maximum capacities referred to a paragraph 9.3.2 is entirely consistent with Note EC021. Paragraph 3.1 of the Note reflects the Issue 3 hearing discussion, where it states that “the Council has previously permitted applications with dwelling numbers exceeding the figures set out in development plan policy”. Paragraph 3.2 of the note advocates the potential “to take all references to development levels (both residential and commercial) out of the policy and include them within a table in the supporting text”. The University supports this change. If this amendment is made, it follows that reference to indicative maximums should also be removed from paragraph 9.3.2, which is currently contrary to the statement made at paragraph 3.1 of the Note and discussion the Issue 3 hearing discussion.
- 8.4 The changes to policy OU1 set out in section 6 would result in the need for consequential changes to **Policy ER2 (Whiteknights Campus, University of Reading)**. The need for these changes was highlighted in the UoR’s Response to Issue 14 (EP031). Both parties agree that the change set out below, which reflects the proposed change to OU1, should be made to address this issue.

Document Reference	Reason	Change
Page 211 Policy ER2	To bring the policy into line with the wording of OU1, as discussed at hearings on 5 October.	<i>“Where development would result in <del>the</del> <u>material</u> need for additional students to be housed <del>in Reading</del>, it should be supported by an <del>appropriate</del> <u>appropriate</u> increase in <u>existing or planned</u> student accommodation. Provision of new student accommodation on the Whiteknights Campus, or as a reconfiguration or extension of nearby dedicated</i>

		<i>accommodation, will therefore be acceptable subject to other policies in the Plan.”</i>
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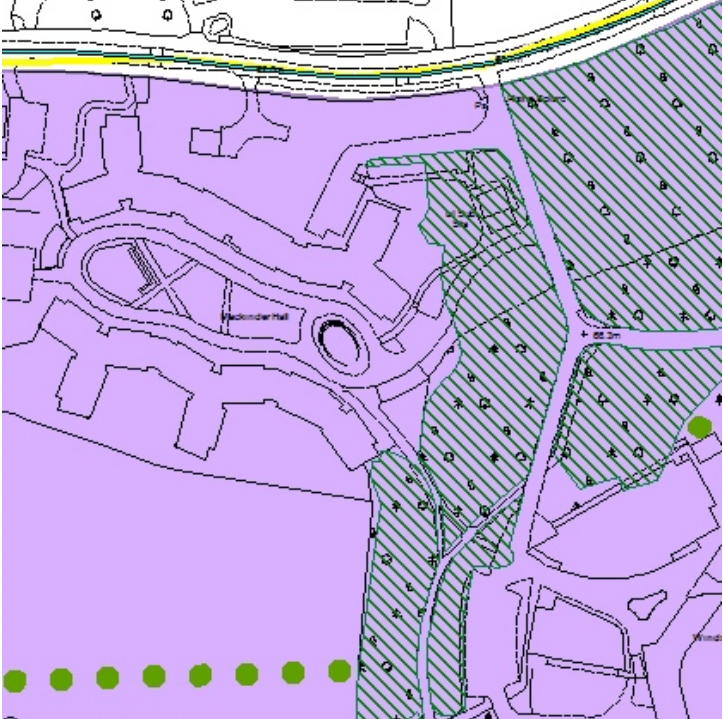
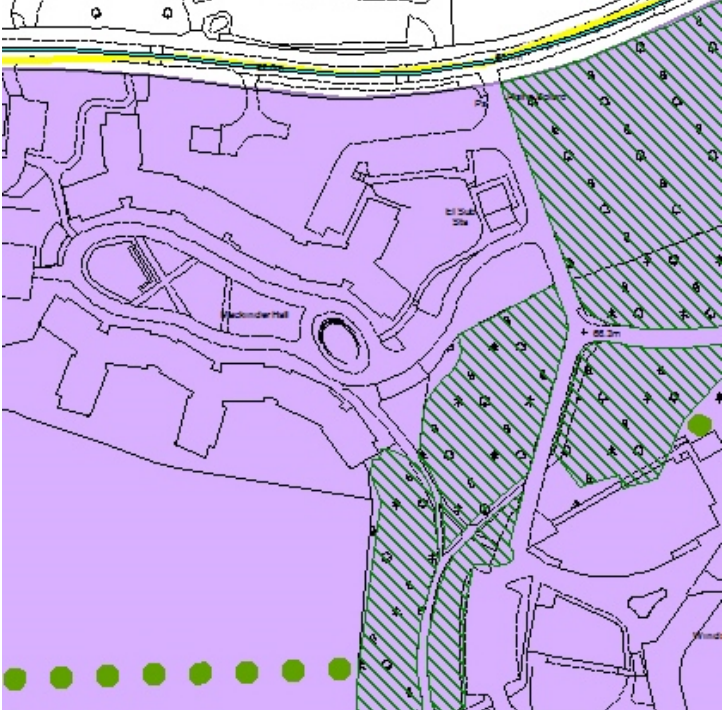
8.5 The changes to the supporting text to policy H12 would also need to be reflected in some additional changes to the supporting text to the section on East Reading. Both parties agree that the changes set out below should be made to address this.

Document Reference	Reason	Change
Page 205 Paragraph 9.2.7	To indicate the relationship between University growth and student accommodation	“The University of Reading is a vital part of Reading’s economy and life, and there will continue to be a need for development to support that role at its main Whiteknights campus, as well as its secondary campus at London Road. This development will be supported, where it does not result in significant adverse effects. However, there is clearly an issue around accommodating students in the area, with many <del>of</del> -existing homes in the area now occupied by students, and therefore concerns about various possible effects such as noise, parking and the sustainability of local services with less accommodation available for families. For this reason, an increase of purpose-built student accommodation is needed, but <del>this</del> <a href="#">Council considers that first priority</a> should <del>preferably</del> be on the existing university sites, both to reduce the need to travel, particularly by car, and so that key sites elsewhere deliver much-needed general housing rather than student accommodation. The Whiteknights campus crosses the boundary with Wokingham, and it is important that policy across the site is consistent.”
Page 212 Paragraph 9.3.10	To indicate the need for student accommodation	“In 2008, the University drew up a Whiteknights Campus Development Plan, which set out the University’s principles for future development of the site, including providing 1,297 additional bedspaces, waste and catering facilities and changes to the accesses and internal circulation. The Development Plan does not form part of the Council’s strategy, but it outlines the changes that are proposed to occur on the site in the coming years, and has informed this policy. Much of the development proposed in that plan has now been built out, but there remains the likelihood of further development over the plan period, <a href="#">including for student accommodation as a result of a growth in student numbers of 28% between 2007/8 and 2016/17, together with any additional growth over the plan period.</a> ”

8.6 In relation to the **Proposals Map**, and as discussed during the hearings session on Friday 5<sup>th</sup> October, the UoR’s Pre-Submission representations and the UoR’s Response to Issue 14 (EP031) highlight that a small area of land east of Mackinder Hall, identified as being of biodiversity importance due to being an area of lowland mixed deciduous woodland on the Submission Draft Proposals Map, in fact has no tree coverage. The parties therefore agree that the following change should be made to the boundary of the area of



biodiversity importance on the Proposals Map to reflect this fact. This change would resolve the UoR's objection to this element of the Proposals Map.

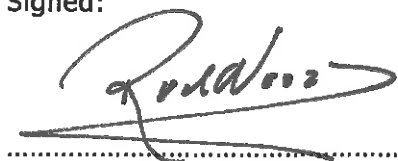
<p>Proposals Map Map Sheet F</p>	<p>To reflect the fact that a small area immediately east of Mackinder Hall is not covered by woodland, as discussed at hearings on 5 October.</p>	<p><i>Delete</i></p>  <p><i>And replace with</i></p> 
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## SIGNATURES

- 9.1 Both parties consider that this Statement represents a reasonable reflection of the areas of agreement and disagreement relating to the Reading Borough Local Plan.

Signed:



..... on behalf of the University of Reading  
(Professor Robert Van de Noort, Acting Vice Chancellor)



on behalf of Reading Borough Council  
(Councillor Tony Page, Deputy Leader and Lead Councillor for Strategic Environment,  
Planning and Transport)

## **APPENDIX 1: UNIVERSITY OF READING STATEMENT ON CAPACITY OF ST PATRICKS HALL SITE**

The University is seeking to establish flexibility within the policy for a number of reasons. Firstly, the Council conceded during hearing session 3 that it reduced the initial capacity of the site from an earlier withdrawn UoR planning application. It removed the number of spaces from the earlier submission in the location of Pearson's Court that became locally listed and is now to be retained. It was established at the hearing session however, that the Council did not seek to ascertain whether it was appropriate to reprovide lost spaces through the retention of Pearson's Court elsewhere within the development.

Secondly, at hearing session 3, the Council pragmatically described how it has previously permitted applications with dwelling numbers exceeding the figures set out in development plan policy. This point is now reflected within Note EC021 that is discussed at paragraphs 8.2 and 8.3 of this statement. Given the concerns with regard to the capacity calculation of the site, an increased upper limit would appear to allow for appropriate flexibility. It is considered that the Council would not be prejudiced by an increased upper limit as the acceptability of the precise number of spaces will be decided through the appeal process. The Council has pragmatically approved applications with higher capacities than policy states. Equally it follows that if it transpires that the higher, indicative, capacities cannot be achieved then the Council could seek to approve a lower number. In order to dissociate the local plan process from the appeal process, it may be preferable to refer to the upper limit of approximately 650 spaces, rather than 654 which is the precise number proposed by appeal scheme.

Thirdly, the University's hesitancy over an upper maximum capacity is that the planning committee used the emerging policy maximum of 450 spaces as a fixed position, even though at the hearing session officers advised that they are indicative. The last sentence on page 7 of the Planning Committee minutes (which the Inspector requested from the Council) specifically refers to the need to accord with the draft emerging local plan. Increasing the upper limit would therefore remove this current ambiguity.

Fourthly, in order to be consistent with the Council pragmatic approach to approved applications at higher than policy levels, it would assist if reference is deleted to the upper maximums at paragraph 9.3.2 of the Local Plan. This matter is further discussed at paragraph 8.2 and 8.3 of this statement.

## **APPENDIX 2a: ACCOMMODATION STRATEGY PART 1 GAP ANALYSIS, SEPTEMBER 2018 – READING BOROUGH COUNCIL’S INITIAL VIEW**

The Council has the following initial comments on the Accommodation Strategy Part 1 Gap Analysis (referred to as URAS here).

Firstly, whilst the URAS aims to outline the scale of undersupply now and over the next ten years, it contains within it momentous levels of growth that have not previously been discussed with the Council at any point. These would have implications far beyond accommodation needs, including on transport infrastructure, the provision of services and facilities, pressures on the natural and historic environment, and impacts on existing communities. The growth anticipated is from just over 16,000 students in 2017/18 to around 21,000 students by 2028, a growth of 5,000 students, or 31% over ten years. As the Council stated during the hearings, 5,000 students equates to a small town.

The justification for this level of growth within the URAS is very limited. The document indicates that it is based largely on continuation of recent growth in student numbers, linked to changes in higher education system at a national level including increased competition, and a significant anticipated growth in the proportion of 18 year olds at a national level. However, the Council has not had a chance to fully examine how these figures have been derived, and does not therefore know whether there is a clear methodology behind them, or whether they represent educated guesswork.

Whatever the method used, it must also be recognised that there are very considerable uncertainties in forecasting such growth. University growth is highly dependent on changes to the higher education system at a national level, and we have seen the effects of this in recent years, where, over a short period of time (5-6 years), the UoR has moved from a situation where it was disposing of student accommodation sites, to the current substantial forecast shortfall. The influence of international students is also a strong part of UoR growth as set out in the URAS, and this will be affected by any changes to migration policy, in particular in the context of Brexit. At a more local level, growth will require the ability to provide sufficient academic and ancillary accommodation, and to adequately staff the University.

Even if these figures are an accurate forecast, the Council strongly believes that it needs the opportunity to consider whether Reading can accommodate this level of growth in such a short time period at all. As set out above, the implications of this level of growth will be hugely significant. Whilst the Council clearly recognises the essential role that the UoR plays in Reading’s economic, social and cultural life, and the need to enable it to continue to grow and change to fulfil this function (as recognised within Local Plan policy ER2), this must be assessed against the effects on the town as a whole. Policy OU1 of the Local Plan expects that additional growth must be capable of being supported by existing or planned student accommodation, policy ER2 sets out some of the main constraints of the Whiteknights Campus itself, whilst other policies in the Local Plan deal with such matters as transport and other infrastructure provision, and proposals for growth will need to be considered against these matters.

In terms of the more detailed accommodation needs, the Council therefore wishes to draw an important distinction between existing accommodation needs as a result of growth that has already occurred or is committed, and future needs as a result of untested levels of further growth.

In terms of the former, the URAS refers to the guarantee that the UoR makes of accommodation for new students who choose the UoR as first preference at application stage. There is currently a shortfall of around 1,000 bedspaces in meeting this guarantee. The Council does not dispute these numbers, although it would point out that it is a matter for the UoR to fulfil any guarantees that it chooses to make, and that the actual waiting list as shown on page 34 of the URAS is somewhat lower at 745. It should be noted that this guarantee refers only to UoR accommodation, so the recent and ongoing trend of private PBSA, generally in the town centre, makes no contribution whatsoever to meeting this guarantee.

The URAS also refers to a shortfall across all years of study of 5,000 students being unable to secure a bed in PBSA in 2017/18 (page 8). This implies that these students have sought accommodation in PBSA, but the Council's understanding is that this is not the case and that the 5,000 is simply the number of students in other forms of accommodation, in particular HMOs. This does not therefore imply that all of these students would move into a PBSA place if available.

In terms of the projected increase in shortfall, this is tied to the future growth of the UoR, and therefore all of the comments made about that future growth in the previous paragraphs apply. The Council would be very concerned if these figures were used to justify changes to the policy position on student accommodation. The Council struggles to see how accommodating those student numbers within the town would be possible without severe impacts on supply of general and affordable housing, and potentially a range of other serious environmental and social impacts.

The URAS discusses the link between the provision of PBSA and the number of students in HMOs, and shows that, in recent years, the years where there have been a drop in the number of students in HMOs have coincided with the opening of Childs Hall and Bridges Hall, two large university halls. There clearly is a link in that the more students that are within student accommodation, the less students are likely to be within HMOs, and the Council accepts the general point.

However, there is an important caveat in that the student accommodation must be an affordable option for students. As the URAS recognises on page 36, the rents for the various private PBSA in Reading (mainly in Reading town centre) are between £185 and £296 per week, which reflects the fact that this is high-specification accommodation, usually featuring self-contained units with their own en-suite and kitchen facilities, and it is out of the price range of the average student. This compares to typical weekly rents in the majority of HMOs of £100 to £115 per week (page 38 of the URAS). This very much limits the degree to which this form of PBSA can reduce the number of students in HMOs. The examples of Childs Hall and Bridges Hall are quite different, being on-campus UoR halls of residence. Childs Hall comprises 8 or 10 bedroom flats with shared kitchen, living and toilet facilities. The URAS does not set out rental figures for UoR-provided PBSA such as these blocks, but the Cushman and Wakefield note that made up part of the UoR's Pre-Submission representations states that "98% of all University provided accommodation is priced below CityBlock's least expensive annual rent" (which was £184 per week).

This illustrates part of the current issue with student accommodation, in that sites, primarily in town centres, are being developed for PBSA which neither meets the town's need for general housing, particularly affordable housing, nor meets most of the UoR's needs for accommodation for its students.

## **APPENDIX 2b: ACCOMMODATION STRATEGY PART 1 GAP ANALYSIS, SEPTEMBER 2018 – CLARIFICATION RESPONSE FROM THE UNIVERSITY OF READING**

The Council's initial response indicates concern that the justification for the level of projected growth is very limited. The overall University growth predictions are based on an assessment of the prevailing market conditions as of the 2017/18 academic year, the University's previous growth trajectory and demographics in the later years. It is challenging to project student number growth over a ten-year period, not least because government policy can change significantly over that period. The figures used in the report represent the University's projection based on the available evidence at the time.

With regard to the effect on projected growth as a consequence of our future relationship with the European Union, the URAS confirms that the significant growth in the number of international students has been from extra-EU students (with a significant number of students from the Far East and North America (45% growth between 2011/12 and 2016/17) rather than those from the EU27 Member States (29% growth in the same period). Indeed, only 6% of current students are from the EU27 countries (Page 22 of URAS). Therefore, it is not considered that the UK's future relationship with the European Union will have a significant impact on the predicted student growth.

The accommodation demand statistics shown in the URAS report are calculated by Cushman & Wakefield (C&W). The demand pool for accommodation has been refined by working with over 100 universities across the UK to determine demand for accommodation. It is trusted by universities, funders and rating agencies as an accurate way of assessing accommodation demand. Using C&W's licensed Higher Education Statistics Agency (HESA) data, C&W are able to determine which students require a bed space by removing those within a commutable distance that live in the parental home or their own residence. All levels of study (i.e. not just undergraduate) and demographic cohorts (not just 18-year olds) are examined with the remaining students requiring a bed space forming the demand pool for accommodation. This is the focus of the gap analysis; and is not challenged by the Council in relation to current demand.

The Council has noted the difference between the shortfall of first-year bedspaces and the waiting list of 745. For clarification, the first-year shortfall is calculated as indicated above. The waiting list numbers are assessed post 1st September in any academic year once there is clarity on how many students under the first-year guarantee (see 6.9 in main report) have achieved their academic offer. The waiting list comprises: students under the accommodation guarantee who have not been able to be accommodated; students who are not under the accommodation guarantee who want to be in University halls; students coming to the University through clearing: all these are 1<sup>st</sup> year students who are demonstrating a clear preference for University PBSA by electing to join the waiting list rather than source accommodation elsewhere. Other students in these categories who express a preference for University PBSA accommodation, when advised that spaces are not currently available, elect not to go on the waiting list but source accommodation elsewhere, therefore the waiting list does not reflect the full demand. There are also a small number of returning students on the list who have elected to wait despite having been advised in February that there are no more returner spaces available. Currently only a limited number of University PBSA spaces are made available to returning students. There are a proportion of returning students who would elect to live in PBSA if that option were available to them; it currently isn't available due to the need to reserve spaces for first year students. On average the University rejects between 500

-700 applications from returning students per annum who then go to the private market when their preferred living arrangements would be University PBSA.

The Council's comment that private PBSA "makes no contribution whatsoever to meeting this guarantee" is not supported by evidence. Many students who are advised that they are not guaranteed a place in University PBSA take up places in private PBSA which in part explains the difference between the size of demand and the waiting list. The University is also willing to enter into agreements with providers for the right product that deliver an appropriate student experience.

### **APPENDIX 3: CAMPUS CAPACITY STUDY, SEPTEMBER 2018 – READING BOROUGH COUNCIL'S INITIAL VIEW**

The Council has the following initial comments on the Campus Capacity Study:

- The Campus Capacity Study is welcomed as a valuable contribution to planning to meet university needs over the coming years. It is agreed that it represents a good first step towards considering a revised masterplan for Whiteknights Campus.
- The Council's views on the Study must be understood in the context that Reading Borough Council is not the local planning authority for much of the main Whiteknights Campus, which falls within Wokingham Borough. Around half (13) of the sites on Whiteknights assessed within the Study are wholly or partly in Wokingham. It will be for Wokingham Borough Council to determine applications on sites within these areas.
- It would also not be appropriate for the Council to provide detailed comments on the assessment of individual sites at this stage, as that would require full consideration through the development management process, ideally beginning at pre-application stage. For that reason, the comments provided here are high level, and generally refer to the overall approach rather than individual sites.
- The Council has concerns about the overall way in which sites have been divided between academic and residential. It is understood that one of the main considerations has been the zoning approach of the Whiteknights Campus Development Plan. However, whilst elements of the Development Plan remain valid, it was prepared in a very different context in terms of the University's growth ambitions. As has been seen, a number of extensive University halls of residence (e.g. Wells Hall, Sibly Hall, Bulmershe) have been sold and redeveloped for general housing since 2008, which demonstrates that the current proposed level of growth was not anticipated at the time the plan was prepared.
- In that context, it is worth noting that, whilst the Campus Capacity Study identifies a need to accommodate a minimum of 25,000 sq m of academic space to meet its growth aspirations, its conclusions are that there is potential for a much higher 50,000 sq m of academic space, so a surplus over identified needs. In short, it appears to have very much prioritised meeting academic needs over residential needs. The need for new academic space to be provided in step with an appropriate level of residential provision is set out within policy OU1 of the Submission Draft Local Plan, and the approach of the Campus Capacity Study would therefore need to be considered against that policy. The Council would want to see consideration of whether some of the surplus academic space could be used to meet residential needs, and indeed whether it would be appropriate to meet the full ambitions for academic space, i.e. the 25,000 sq m, when there are such issues in providing supporting residential accommodation.
- Regarding the London Road campus, the Council agree that the site is heavily constrained and that opportunities for further development are limited and unlikely to be strategic in scale.
- In terms of Whiteknights, a number of sites including open car parks have been discounted at the outset due to the importance of retaining car parking. However, the Council would want to see consideration of whether there is scope to develop all or parts of sites such as 1.7, 1.9, 3.4 and 3.8 whilst retaining undercroft parking.
- The Council's view is that capacity for further growth on some sites may have been overestimated, and has particular concerns on some sites regarding loss of sports

facilities, landscape impacts and setting of heritage assets. This is particularly relevant, although not limited, to the sites identified as residential.

- In overall terms, on the sites assessed, the Council feels that the overall capacity of the sites assessed for academic space to accommodate development are broadly in the right area. Although we do not necessarily agree with each site's individual capacity, any over- or underestimates may broadly balance themselves out. On the sites assessed for residential, we consider that there has been something of an overestimate of available capacity, which could equate broadly to approximately 500 beds. However, as set out above, we consider that there may be scope for the suitability of other sites to be considered, and for a greater rebalancing of academic and residential space across the campus.