
Reading Borough Local Plan Public Examination

Response to Inspector's Matters and Issues
On behalf of University of Reading (UoR)

Issue 1
Legal Requirements and Procedural Requirements

September 2018

**Reading Borough Local Plan
Public Examination**

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Issue 1:**

Legal Requirements and Procedural Matters

Barton Willmore LLP on behalf of the University of Reading

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0.0 INTRODUCTION

- 0.1 Barton Willmore LLP is instructed by the University of Reading (UoR) to submit this written Hearing Statement ("HS") in response to the Inspector's Matters and Issues for Examination. These representations expand upon the representations submitted on behalf of the UoR in response to the relevant Regulation 18 and Regulation 19 consultations on the emerging Reading Borough Local Plan.
- 0.2 This statement does not respond to all questions raised under Issue 1, but focuses on those of particular relevance to the interests of the UoR. Whilst efforts are made not to duplicate the content of previous representations, this HS draws on previous responses where necessary.

RESPONSE TO INSPECTOR'S QUESTIONS – Issue 1

Issue 1: Have the relevant procedural requirements been met, including the duty to co-operate?

1.0 Q1. Has the LP been prepared in accordance with the Duty to Co-operate and does it fully meet this legal requirement?

1.1 No comment.

2.0 Q1a. What are the key outcomes from the co-operation with neighbouring authorities, particularly relating to the shortfall of dwellings and Gypsy and Travellers and Travelling Showpeople accommodation identified within the Reading area, education provision and transport?

2.1 No comment.

3.0 Q1b. Is the housing market area and functional economic areas agreed with adjoining authorities, and are they suitably defined?

3.1 No comment.

4.0 Q2. Has the LP been prepared to comply with the adopted Statement of Community Involvement (PP002), and does it meet the minimum consultation requirements set out in the Regulations?

4.1 No comment.

5.0 Q3. Is the Sustainability Appraisal (LP005) suitably comprehensive, and is it clear how the Sustainability Appraisal influenced the final plan and dealt with mitigation measures? Has it sufficiently evaluated reasonable alternatives including in meeting housing needs including student accommodation and employment provision?

5.1 No.

- 5.2 Whilst the University agrees with the SA assessment of proposed allocation ER1c (land rear of Redlands Road), it was considered that a marginally higher number of dwellings could be accommodated on the site (i.e. up to 20 dwellings). The site, forming part of the University's available campus land could also potentially accommodate other uses such as academic development (which could include student accommodation) as recognised within paragraph 9.3.4 of the emerging Local Plan. The potential for these alternative uses should be assessed within the SA.
- 5.3 With regard to the Boat Club site (CA1a), the University considers that the site would hold capacity for up to 40 dwellings (up from the potential allocation for up to 25 dwellings) subject to technical solutions being explored to resolve any potential flood risk concerns which may arise from developing within areas within Flood Zone 3.
- 5.4 In terms of student accommodation (Policy H12), the Sustainability Appraisal (the "SA") is negatively worded and seeks to restrict student accommodation in favour of general housing needs. As such, the SA does not sufficiently evaluate reasonable alternatives in meeting student accommodation need.
- 5.5 The submission version of the Local Plan (the "emerging Local Plan") recognises that, in terms of Reading's economy, the UoR makes a "major contribution to its economic success" (paragraph 4.4.95 of the emerging Local Plan) and that it is important that the University is able to provide student accommodation to ensure it remains a "major focus internationally" (paragraph 9.2.5 of the emerging Local Plan). However, there appears to be a disconnect between such recognition and positive support for meeting demand for student accommodation (need and capacity are dealt with in the University's response to Issue 7).
- 5.6 The Council's Regulation 19 consultation on the proposed submission draft of the emerging Local Plan attached the SA of the emerging policies thus far. Within the SA the Council had evaluated three scenarios;
- (i) No policy;
 - (ii) Locate student accommodation throughout the Borough; and
 - (iii) Focus student accommodation close to the university and on campus if possible.

- 5.7 The Pre-Submission SA concluded that Option (iii) was the preferred option, "striking a balance between the need for student accommodation and the more pressing need for general housing." In reaching this conclusion, the SA recognised the need for some student accommodation but does not sufficiently evaluate the potentially significant negative impacts from restricting student accommodation to those locations "close to the university and on campus if possible."
- 5.8 The University commented, in response to the Pre-Submission SA, that the phrase "close to the university" within the Council's chosen preferred option concerning student accommodation delivery implies allowance for locations where students would be able to conveniently access the University campus via sustainable transport modes including walking, cycling and public transport. This would have been a proportionate option which would have allowed sustainability considerations to be at the heart of determining where would be appropriate to locate student accommodation in principle, i.e. in locations where students could sustainably access education facilities, including (but not restricted to) those located at the University of Reading's Whiteknights and London Road campuses.
- 5.9 The Council's chosen wording for draft Policy H12 (student accommodation) of the emerging Local Plan however looks to direct student accommodation to locations "on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation." Such wording had not been tested within the SA. The Council proposed, in reply, to change "close to" to "adjacent to" within the SA to better align with emerging Local Plan Policy H12.
- 5.10 The University have previously commented on the lack of clarity on why the SA concludes that student accommodation would adversely affect Local Plan Objective 9 (create, enhance and maintain attractive and clean environments including protecting and, where appropriate, enhancing landscape and townscape character) if located in other locations across the Borough. In response, the Council have stated the negative score the SA attributes against Objective 9 is due to the potential "negative impacts with regard to townscape character as the proliferation of HMOs can bring negative effects". The University agrees that the proliferation of HMOs can bring negative effects on a community and townscape. However, it is considered that the SA fails to address that dedicated student accommodation proposals elsewhere in the Borough, in locations which can sustainably access higher and further education campuses, and other services and facilities (such as those within Reading Town Centre) would not bring the same potential negative impacts on townscape character as HMOs.

- 5.11 As such, the SA should test a fourth option which appraises an option which seeks to direct new student accommodation to locations on or close to existing higher and further education campuses or other sustainable locations.
- 5.12 It is evident from the SA of the emerging Local Plan that options tested concerning student accommodation centre around controlling where the Council would consider student accommodation should be located and does not effectively test how Policy H12 would help meet student accommodation needs alongside reasonable alternatives.