



Gas Holder, Reading Reading Borough Local Plan Examination

Response to Inspector's Matters & Issues for Examination
Matter 2 – Housing Requirement and Five Year Supply of Housing Land

Boyer

Report Control

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Primary Author	Ellen Timmins
Checked By:	Karen Charles

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1. INTRODUCTION

- 1.1 This Statement has 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 the Inspector's Matters, Issues and Questions for the examination of the Reading Borough Council Local Plan (EI003).
- 1.2 Boyer has been appointed by SGN as advised by Danescroft to act on their behalf in respect of the land known as the 'Gas Holder' site, which is currently operated by SGN as part of its gas infrastructure. The site is allocated for development in the Reading Central Area Action Plan (RCAAP) (2009) under Policy RC3f, Gas Holder.
- 1.3 The submitted version of the emerging Local Plan proposes the continued allocation of the site for residential development as part of the East Side Major Opportunity Area (MOA) under draft Policy CR13(d), Gas Holder.
- 1.4 SGN as advised by Danescroft have been in pre-application discussions with Reading Borough Council (RBC) since March 2018 in relation to the proposed redevelopment of the site for residential use following the planned removal of the existing gas holder. The latest proposals envisage approximately 130 dwellings with associated vehicular, pedestrian and cycle access, parking, open space and landscaping. A full planning application is expected to be submitted later this year.
- 1.5 This Statement relates to Matter 2: Housing Requirement and Five Year Supply of Housing Land.

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2. MATTER 2: HOUSING REQUIREMENT AND FIVE YEAR SUPPLY OF HOUSING LAND

Issue 3: Whether the Council will be able to demonstrate a five year supply of housing land on adoption of the LP?

Q3. Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity in the Housing and Economic Land Availability Assessment (EV013-EV015) reasonable and realistic?

- 2.1 The assumptions and analysis regarding the development capacity of the Gas Holder (CR13d, HELAA ref: AB016) in the Housing and Economic Land Availability Assessment (HELAA) are not reasonable or realistic.
- 2.2 The Berkshire HELAA Methodology (November 2016) (EV013) does not set out a standardised approach by which the Berkshire authorities will assess the development capacity of individual sites.
- 2.3 RBC's approach to estimating development potential (i.e. capacity) comprises Step 2a of the HELAA, as detailed in paragraphs 3.3-3.11 of the Reading HELAA Volume 1: Main Report (November 2017) (EV014).
- 2.4 The HELAA uses a number of ways to estimate the development potential for particular sites. For sites not already benefitting from planning permission, one of the following two approaches is used (paragraphs 3.5-3.8 of the HELAA refer):
 - Either a standard 'pattern book' approach is 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.
- 2.5 In the case of the Gas Holder (CR13d, HELAA ref: AB016), RBC derived the estimated development capacity using the pattern book approach, rather than a site-specific manual calculation.
- 2.6 Figure 2 of the HELAA ('Broad characterisation of the Borough for the purposes of site identification only') identifies the site as falling within the 'urban' classification, where a standard density assumption of 74dph has been applied (as per paragraph 3.5 of the HELAA). It is acknowledged however at paragraph 2.4 and footnote 4 that some smaller sites in the 'urban' area can accommodate a higher density of development, and so RBC has used a density of 110 dwellings per hectare for the purpose of setting a minimum site size threshold in the 'urban' area.

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- 2.7 It is therefore clear that there is potentially a significant range of development densities that can be accommodated across sites in the 'urban' area. This is unsurprising given the significant area of the Borough that is covered by this characterisation, which includes land both within and outside of the Central Area. We therefore concur with the Council's decision to undertake a manual calculation of development capacity for a number of sites where pattern book approaches are not applicable, particularly in the Central Area, however for the reasons discussed below it is considered that the same approach ought to be have been used in respect of the Gas Holder.
- 2.8 Appendix 1 ('Site Summaries') of EV014 gives the Gas Holder a 'Final suitable, available and achievable development' capacity of 46 dwellings based on the pattern book approach. This contradicts the Stage 2(a) assessment of development potential in the Reading HELAA Volume 2: Detailed Site Tables (November 2017) (EV015), which gives the Gas Holder a final 'tally' of 58 dwellings based on the pattern book approach.
- 2.9 Notwithstanding this discrepancy, an assumed development capacity of 46 or 58 dwellings on the Gas Holder site is neither reasonable nor realistic, and fails to recognise the potential of this sustainably located brownfield site to deliver more housing. The reasons for this are discussed in response to Question 3a below.

Q3a. In particular, is the identified capacity for sites CR12b, CR13c, CR13d, CR14g, SR3, WR3j, ER1c and ER1e justified?

- 2.10 No objection is raised to the pattern book approach used in the HELAA in principle, however for the reasons set out in our representations on the Pre-Submission Local Plan it is considered that the Gas Holder (CR13d) is a prime example where a site-specific manual calculation is required to determine potential capacity in light of the unique opportunities and constraints that the development of the site presents.
- 2.11 Whilst the exact proposals are still a work in progress as part of ongoing pre-application discussions with RBC, the latest proposals for the Gas Holder site envisage approximately 130 dwellings. The emerging proposals comprise a mix of 2 and 3 bedroom houses and 1, 2 and 3 bedroom flats in two apartment blocks rising up to 4 and 11 storeys respectively. This scale of development is a product of a detailed evaluation of the site's opportunities and constraints, such as:
- The prominent location of the site itself, which, along with the rest of the East Side MOA, is highly visible from the railway line and influences the perception of Reading for people who arrive or pass through by rail, as recognised in paragraph 5.4.22 of the submission Local Plan (LP001) and the Sustainability Appraisal (LP005), which notes that "*the [Gas Holder] site is prominent on entry to Reading by train*";
 - The opportunity for the site to become a river gateway to Reading, as envisaged in draft Policy CR13d; and

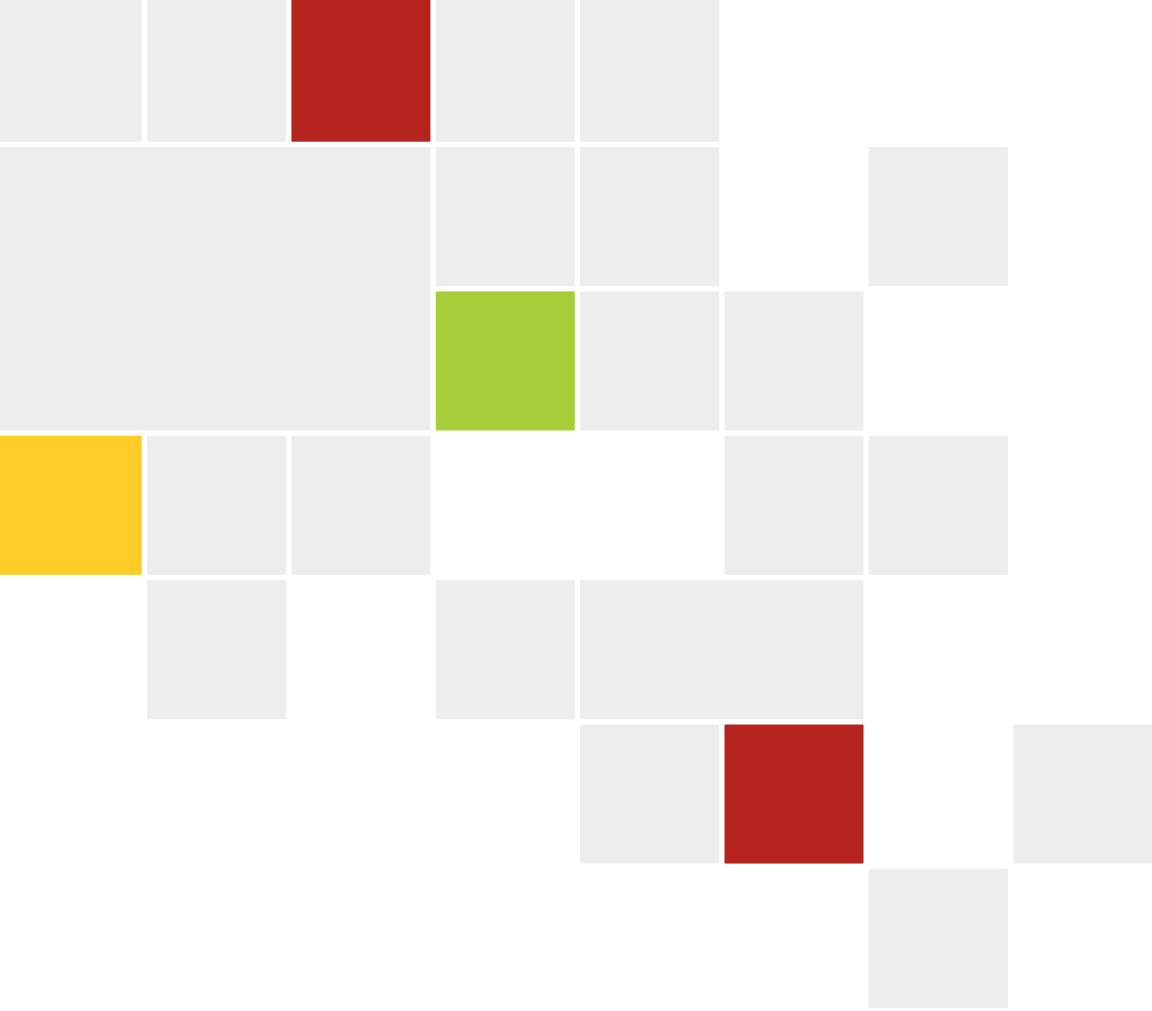
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- Fundamentally, the need to provide a sufficient number of dwellings to ensure the redevelopment of the site is viable. The costs of redeveloping a site such as this are not insignificant, due primarily to the costs associated with dismantling the gas holder and decontamination of the site itself. This would prohibit a lower density residential scheme, similar to the neighbouring Bellway development, from being a viable alternative, and yet this seems to be what the HELAA envisages. This is particularly important if the site is to deliver a policy-compliant level of affordable housing.

2.12 The identified capacity for CR13d is therefore not justified. A site-specific manual calculation ought to have been used, as the pattern book approach has underestimated the potential capacity of the site. A development of 46 dwellings would represent a development density of c.65 dwellings per hectare (dph). By way of comparison, the recently completed neighbouring development by Bellway immediately to the west of the Gas Holder site has a density of 77dph, and yet the Gas Holder site would be expected to be developed at a significantly higher density than this neighbouring development given its prominent location at the apex of the East Side MOA.

2.13 Initial work has identified that assuming a policy compliant level of affordable housing, the site would need to accommodate a minimum of 100 dwellings for it to be a viable development opportunity, whilst ongoing design development work suggests the site could accommodate approximately 130 dwellings. A range of 100-130 dwellings should therefore be included in Policy CR13d, in order to give clarity and certainty to the landowner, developer and all other local stakeholders going forwards.

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