



READING BOROUGH LOCAL PLAN PUBLIC EXAMINATION

**Response to Inspector's matters and Issues
On behalf of University of Reading**

**Issue 3 – Housing Land Supply in Respect of Student
Accommodation**

September 2018

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1.0 Introduction

- 1.1.1 WYG is instructed by the University of Reading to submit this Hearing Statement in response to the Inspector's Matters and Issues for Examination. WYG previously submitted representations, dated 24th January 2018, at the Pre-Submission consultation stage of the Local Plan.
- 1.1.2 This statement relates purely to Issue 3, questions Q3 and Q3a, of the Inspector's Matters and Issues for Examination in so far as these questions relate the Local Plan strategy for the provision of student accommodation. In particular, this statement responds to these questions within the context of Policy ER1e, which allocates St Patrick's Hall, Northcourt Avenue, for intensified student accommodation.
- 1.1.3 Other representations have been submitted by Barton Willmore LLP on behalf of the University of Reading in relation to a number of the other Examination Issues.

2.0 Response to the Inspector's Questions – Issue 3

2.1 Question 3 - 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?

2.1.1 Not all these assumptions are correct.

2.1.2 The University supports the view that site ER1e, in relation to St Patrick's Hall, is suitable and available for the delivery of intensified student accommodation.

2.1.3 The Housing and Economic Land Availability Assessment (HELAA) however does not provide a robust capacity assessment of the St Patrick's Hall site. The reasons for this are stated in full in response to Question 3A below.

2.2 Question 3A - In particular, is the identified capacity for sites CR12b, CR13c, CR13d, CR14g, SR3, WR3j, ER1c and ER1e justified?

Introduction

2.2.1 In response to Question 3A, we respond purely in relation to the capacity of site ER1e, St Patrick's Hall, Northcourt Avenue and site ER1c, Land Rear of 8-26 Redlands Road.

Policy ER1e – St Patricks Hall

2.2.2 Policy ER1e is copied below.

ER1e *ST PATRICK'S HALL, NORTHCOURT AVENUE*
Development to intensify the provision of student accommodation on site, with retention of locally-listed Pearson's Court.
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.*

Site size: 3.39 ha Net gain of approximately 450-500 bedspaces

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- 2.2.3 There is no clear evidence submitted in support of the Local Plan Background Paper or other supporting documents that describe how the Council derived the proposed net gain of approximately 450-500 bedspaces for students. The HELAA documents referred to in Question 3 (documents EV013-EV015) refer to the capacity of residential dwellings and apply a conversion multiplier of 4 to 'convert' residential unit numbers to student bedspaces. This is an inherently inaccurate and inappropriate approach to the capacity of the site.
- 2.2.4 The HELAA documents also do not take into account any objectively assessed need for student accommodation. As will be described below, there is an existing shortfall whereby the University is unable to meet its first-year student guarantee (where first year students who have the University as their first choice are guaranteed accommodation) of some 1000 bedspaces within campus accommodation for first year students. This is the existing shortfall figure and does not take into account the planned growth of the University of Reading, which will further increase the demand for student accommodation.
- 2.2.5 As Policy ER1e is currently drafted, the proposed 450-500 bedspaces would not meet the identified existing first year accommodation shortfall. Given that site ER1e is the only campus based allocated site within the draft Local Plan for student accommodation, it is paramount that any redevelopment of the site is undertaken efficiently to address the identified and immediate shortfall. Further development will be required to meet the future need.

St Patrick's Hall Planning History

- 2.2.6 The St Patrick's Hall campus, which is within walking distance of the main Whiteknights campus, has accommodated students as part of the University of Reading since 1904. Currently the St Patrick's Hall campus provides 1081 student bedspaces.
- 2.2.7 In June 2016 the University of Reading submitted a planning application (application 161182/FUL) to redevelop the St Patrick's Hall campus. This application comprised the demolition of buildings within the site (including 298 bedspaces) and the erection of 1024 new student bedspaces (net increase of 726 bedspaces) in buildings ranging from 2 storeys to 6 storeys in height.
- 2.2.8 During the course of the 2016 application, Pearson's Court, which one of the buildings proposed to be demolished, was locally listed by the Council. The June 2016 application was subsequently withdrawn.
- 2.2.9 A revised planning application (application 172045/FULL) was submitted in November 2017 that retained Pearson's Court and reduced the total number of new proposed bedspaces to 836 (a net increase of 654). The proposed accommodation was reduced in height compared to the withdrawn application, ranging from 2 storeys to 5 storeys in height.
- 2.2.10 The November 2017 application was referred to the planning committee in February 2018 with an officer's recommendation of approval. The committee took a contrary decision to the officer's recommendation and resolved to refuse the application for the following summarised reasons:

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1. Visual impact and obtrusive nature of the proposed taller buildings in terms of impact upon the character of the area, the impact to the setting of the locally listed Pearson's Court, the number of students and density of the scheme would imbalance the existing residential community and the harmful loss of mature trees within the site.
 2. The lack of parking proposed for students would lead to unacceptable additional pressure on parking on surrounding streets.
 3. The lack of a S106 agreement.

2.2.11 In August 2018 the University of Reading submitted an appeal against the Council's refusal (PINS reference APP/E0345/W/18/3209702). In summary, the Statement of Case against the refusal reasons is as follows:

1. The November 2017 application significantly reduced the number of bedspaces compared to the June 2016 application (a net reduction of 188 bedspaces) to account for the local listing of Pearson's Court. The taller buildings, nearest to Pearson's Court were reduced in height to a maximum of 5 storeys and are set back from the street scene by at least 80m. The main elements that contribute towards the setting of Pearson's Court, such as the Northcourt lawns, are retained. It is entirely appropriate to intensify the site given the shortfall in accommodation at an existing residential University Campus within walking distance of the main academic campus. All category A trees are retained within the development and significantly more trees are planted than are to be removed.
2. The Council's adopted parking standards do not permit parking for students in this location. This refusal reason is therefore contrary to the Council's own adopted policy.
3. The S106 Heads of Terms were agreed between parties and an agreement would have been provided had the committee resolved to approve the application. A S106 will be provided through the appeal process.

2.2.12 It should also be noted that the November 2017 application achieves all of the requirements of Policy ER1e, namely the retention of Pearson's Court and measures to enhance its setting and retention of important trees. No archaeological, ecological or water/wastewater infrastructure concerns were raised by the applications.

2.2.13 It is recognised that the Local Plan examination is not the forum to consider the merits of the appeal. Whilst there is clearly a disagreement between parties as to the appropriate capacity of the site, the question posed in the Inspector's Matters and Issues (issue 3, question 3 and 3a) is whether the Council's approach to the capacity of site ER1e is justified. We set out below why it is considered that the Council's capacity assessment is not justified.

The Council's Response to Pre-submission Draft Representations

- 2.2.14 The Inspector will have seen the previously submitted representation by WYG on behalf of the University of Reading, dated 24th January 2018, at the Pre-Submission consultation stage of the Local Plan. The Council has responded to this and all representations within the Statement of Consultation on Pre-Submission Draft Local Plan March 2018 (document reference LP006).
- 2.2.15 Pages 379 to 381 of document LP006 sets out the Council response to the WYG representations. With regard to the capacity of site ER1e, the Council make the following key points:
1. That the 450-500 beds capacity proposed within Policy ER1e are indicative.
 2. The capacity of the site is looked at in more detail in the Local Plan Background Paper.
 3. The 450-500 beds capacity figure was not derived by reducing the net increase of 726 bedspaces proposed by the June 2016 planning application to take account of the local listing and retention of Pearson's Court.
- 2.2.16 In response to the Council's comments, confirmation that the 450-500 capacity is indicative is welcomed, however it is still maintained that the Council has not provided an appropriate justification for the capacity of the site. Contrary to the Council's claims, summarised at points 2 and 3 above, the HELAA does indicate that an estimate reduction of the June 2016 proposed bedspaces was made by the Council. The HELAA evidence is discussed further below.

The HELAA Evidence and Capacity Methodology

- 2.2.17 Document EV013 (HELAA methodology) makes no reference to the St Patrick's Hall site. It makes passing reference to student accommodation at paragraph 1.4 and table 1 to uses [other than dwellings] that local authorities might want to include within future HELAA assessments.
- 2.2.18 Document EV014 (HELAA part 1) contains no assessment of the need for or availability of sites for student accommodation. At Paragraphs 1.11 and 7.3 state that there is no identified need for any student accommodation. This is clearly at odds with the student accommodation demand identified by the University of Reading, submitted by Barton Willmore LLP in relation to Issue 7 and other demand assessment documents previously submitted to the Council as part of the planning applications for the St Patrick's Hall site.
- 2.2.19 Appendix 1 of Document EV014 refers to St Patrick's Hall accommodating 107 residential units. No justification is provided as to how this number of units has been reached and is at odds with Policy ER1e that refers to indicative levels of 450-500 of bedspaces.

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- 2.2.20 Document EV015 (HELAA part 2) refers at 'Stage 2 (A): Assessing Development Potential' to St Patrick's Hall accommodating 182 dwellings. It states that these figures are "manually calculated" and "from planning application – divide by four to translate student accommodation to dwellings".
- 2.2.21 The HELAA appears to be adjusting the provision of student accommodation by a factor of 4 in order that it may contribute towards the 5 Year Supply of Housing (dwellings falling within the C3 use class).
- 2.2.22 When the 182 dwellings is multiplied by 4 a total of 728 units is derived. This is broadly equivalent to the 726 net increase of student accommodation proposed by a previously withdrawn application (reference 161182/FUL) at St Patrick's Hall. This application was withdrawn following the Council's decision to locally list a building within the site (Pearson's Court) that was proposed to be demolished.
- 2.2.23 Stage 2 (B): Assessing Suitability refers to "development potential reduced to account for retention of Pearson's Court" and refers to a revised figure of 119 dwellings. When multiplied by 4 this equates to 476 units, approximately midway between the 450-500 bedspaces proposed by Policy ER1e.
- 2.2.24 The midpoint figure of 475 bedspaces features in table 4.25 of the Local Plan Background Paper (document reference EV002). Table 4.25 also lists student accommodation sites that have been completed, under construction and with planning permission. Aside from completed projects listed in table 4.25, there are no further sites based on campus based sites that are required to meet the University first-year student accommodation guarantee.
- 2.2.25 Contrary therefore to the Council's responses to the WYG Pre-submission Draft Local Plan representations, it is evident that the Council did use the June 2016 planning application proposed 726 bedspaces site capacity as a starting point. It has then reduced the capacity using an unknown methodology, although reference is made to a manual calculation, to 476 bedspaces to take account of the retention of Pearson's Court.

Site ER1e Capacity Conclusions

- 2.2.26 As described in the WYG Pre-submission Draft Local Plan representation, and now evidenced above, the ER1e site capacity was reduced to take out the new build bedspaces lost through the retention of Pearson's Court based upon the starting position of the June 2016 application. The Council has not actually undertaken its own site capacity assessment.
- 2.2.27 The reduction in capacity that accompanied the Pre-submission Draft Local Plan was prepared prior to the submission of the November 2017 application. What the draft policy didn't recognise is that there are further opportunities within the site to make up the shortfall in accommodation previously proposed in the location of Pearson's Court. The Council's approach of merely reducing the capacity by an approximation of the accommodation that was previously proposed in place of Pearson's Court is therefore not robust.

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- 2.2.28 It is therefore evident that the Council has not provided a justified capacity assessment of the ER1e site. Furthermore, the Capacity figure of between 450-500 bedspaces does not take into account the shortfall of 1000 bedspaces to meet the University first-year student guarantee of campus located accommodation for first year students.
- 2.2.29 The Council's approach of describing the capacity of the site expressed as dwellings and using a multiplication factor of 4 is also confusing and inappropriate.
- 2.2.30 It has been demonstrated through the current application (ref. 172045) at St Patrick's Hall that the site can accommodate a net increase of 654 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.

Policy ER1c – Land Rear of 8-26 Redlands Road

- 2.2.31 The University support the inclusion of the Redlands Road site, referenced under draft Policy ER1c.
- 2.2.32 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.
- 2.2.33 Whilst the University supports the inclusion of the Redlands Road site as a draft allocation, with the significant housing shortfall 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.
- 2.2.34 As stated previously in Pre-submission Draft Statement issued by Barton Willmore on behalf of the University, 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. A Campus Capacity Study appended to the Issue 7 Hearing Statement prepared by Barton Willmore on behalf of the University demonstrates that the site can accommodate the number of dwellings proposed in the draft Plan on one part of the overall site: with an opportunity for further development for a variety of uses (academic or residential) on the remainder.

