
Reading Borough Local Plan Public Examination

Response to Inspector's Matters and Issues
(On behalf of Thames Properties Limited)

Issue 6
Employment

September 2018

**Reading Borough Local Plan
Public Examination**

Response to Inspector's Matters and Issues

Issue 6:

Employment

Barton Willmore LLP on behalf of Thames Properties Limited

Project Ref:	28519/P1/A5	28519/P1a/A5	28519/P1a/A5
Status:	Draft	Draft	Final
Issue/Rev:	P1	P1a	P1a
Date:	4 th September 2018	7 th September 2018	12 th September 2018
Prepared by:	Katherine Jones	Katherine Jones	Katherine Jones
Checked by:	Kim Cohen	Kim Cohen	Kim Cohen

Barton Willmore
The Blade
Abbey Square
Reading
Berkshire. RG1 3BE

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

Ref: 28519/P1a/A5/KJ/KC/dw

Date: 12th September 2018

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

0.0 INTRODUCTION

- 0.1 Barton Willmore LLP is instructed by Thames Properties Limited ('Thames Properties') 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 Thames Properties in response to the Regulation 19 consultation on the emerging Reading Borough Local Plan.
- 0.2 This statement does not respond to all questions raised under Issue 6, but focuses on those of particular relevance to the interests of Thames Properties. 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 6

Issue 6. Are the policies for employment justified, deliverable and consistent with national policy?

1.0 Q1. Is the new floor space provision set out in Policy EM1 justified?

1.1 No comment

2.0 Q1a. Are the requirements for affordable housing in relation to employment development as set out in criterion (a) and (b) of Policy EM1 justified and based on robust evidence?

2.1 No comment.

3.0 Q2. Is the identification of the Core Employment Areas in Policy EM2 based on robust evidence?

3.1 We do not consider that the identification of the Core Employment Areas (CEAs) in Policy EM2 is based on robust evidence. Thames Properties control land within the Richfield Avenue employment area, which is designated as a CEA (Site EM2g) in the Draft Local Plan.

3.2 The identification of the CEAs in Policy EM2 is based on the Reading Employment Area Analysis (March 2018). The Analysis considers which sites in the borough are of greatest importance to the future economic prospects of Reading and should therefore be protected as CEAs, and which have the potential to be released for other uses.

3.3 In total, plots 1-13 within the Richfield Avenue employment area are considered in the Council's Analysis. Plots 6, 11 and 13 are proposed to be potentially suitable *'as part of a wider release'* from the CEA. Plot 6 is the former Cox & Wyman site which is a proposed allocation for residential development in the Draft Local Plan and now has a resolution to grant planning permission for 96 dwellings. Plots 11 and 13 are also proposed site allocations for residential development (Policies WR3b and WR3c). The report states that these plots could be suitable as part of a wider release but does not elaborate on the extent of the wider release. The plots are illustrated in **figure 1.1** below which is extracted from Appendix 1 of the report.

3.4 The Draft Local Plan proposals map reflects this conclusion and proposes to remove Plots 6, 11 and 13 from the CEA (Policy EM2g designated area) and allocate for development as shown in the extract from the RBC Policy Map at **Figure 1.2** below.

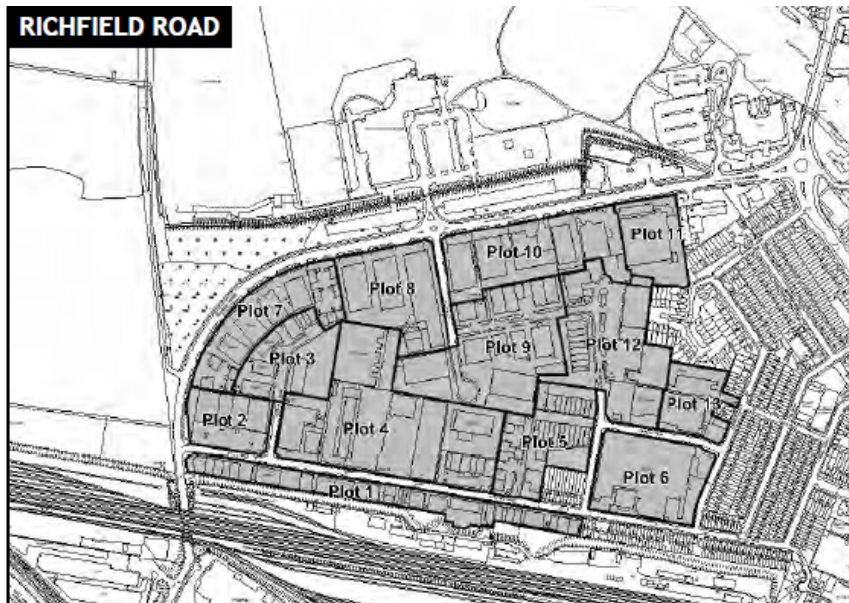


Figure 1.1: Extract from Reading Employment Area Analysis (Appendix 1) (March 2018)

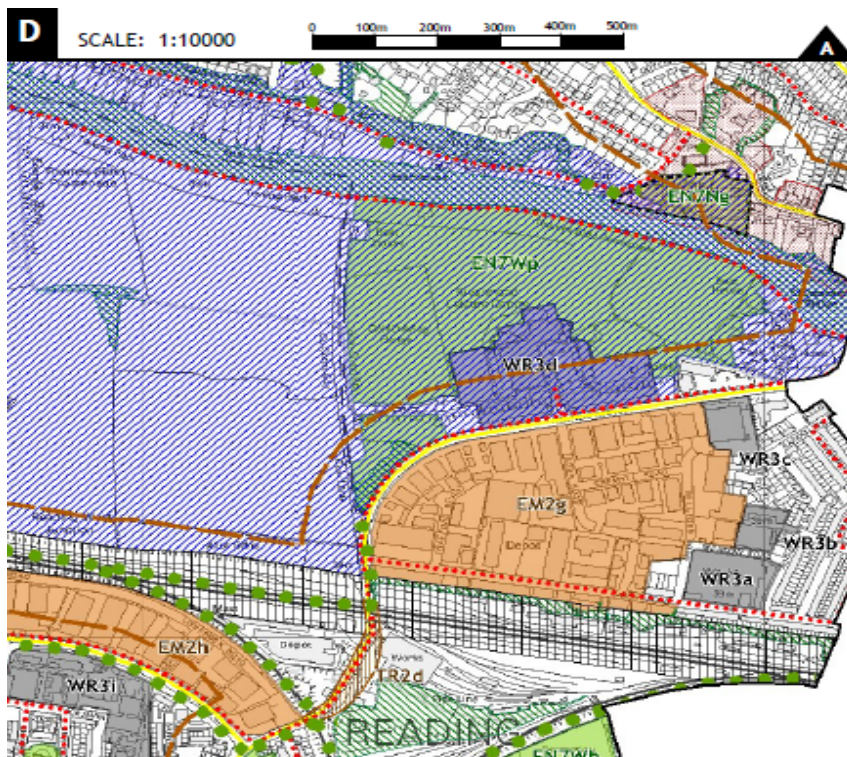


Figure 1.2: Extract from Reading Borough Draft Local Plan Proposals Map (April 2017)

- 3.5 The remaining plots are not considered to be suitable for release in the Analysis (plots 1-5, 7-10 and 12) and the report concludes that they should remain in the CEA. However, Plots 4, 9 and 10 are considered as only 'possibly' having a market demand, yet they are not considered to be possible to release in isolation. There is no justification in the report for why individual units cannot be taken out of the CEA and put to better uses that are ancillary to the overall employment function but support the area economically, particularly where there is apparently no market demand for the unit in its current use.
- 3.6 The Analysis also acknowledges at paragraph 2.4 (4th bullet) that with regard to industrial and warehouse space in Reading, *'a number of locations at the time of the survey had vacancy levels well below 10%... whilst Richfield Avenue in particular had high levels of vacancy'*. Paragraph 2.4 also states (9th bullet) that *'access to the strategic road network, particularly for HGVs, is of particular importance. This makes locations close to Junctions 11 and 12 of the M4 particularly attractive to occupiers.'* With that in mind, it is questionable whether the CEA designation for Richfield Avenue should be carried forward when the evidence presented in the Council's Analysis suggests that there is a lack of demand for occupiers in this edge of town centre location.
- 3.7 Thames Properties does not dispute that Richfield Avenue is a generally suitable location for employment uses. However, given the conclusion in the Analysis that some plots are suitable for release from the CEA and that there are high employment vacancy rates within Richfield Avenue (suggesting that there is little demand for occupiers in this location), it is unclear how the evidence supporting Policy EM2 (i.e. the Reading Employment Area Analysis (March 2018)) leads to the conclusion that the whole of Richfield Avenue should remain a CEA.

4.0 Q2a. Is the provision relating to non-employment uses within the Core Employment Areas in Policy EM2 justified and will it be sufficiently flexible?

- 4.1 Policy EM2 states that *'Non-Employment uses that would support the area's economic function may be located in the Core Employment Areas where they do not result in a loss of employment land.'* Thames Properties support the flexibility within Policy EM2 to allow for non-employment uses within the CEAs, however it is unclear how the Council will measure the potential loss of employment land that may result through the introduction of non-employment uses. The policy is ambiguous in requiring the level of 'employment land' to be maintained, and whether this applies to floorspace or the total area of the CEA.

- 4.2 Similarly, Policy EM3 states that *'Within the Core Employment Areas, the overall level of employment land should be maintained. Proposals that would result in a loss of such land will not be permitted.'* It is unclear from both references whether 'Employment land' refers to overall floorspace or physical land take within the CEA and greater clarity is required in this regard for the applicant and decision taker.
- 4.3 There is also some discrepancy between Policies EM2 and EM3 insofar as EM2 seeks to introduce some flexibility into the CEAs and enhance their appeal to potential occupiers by allowing for *'non-employment uses that would support the area's economic function'*. Conversely, Policy EM3 is more specific in requiring *'related alternative commercial uses'* or *'a use ancillary to the employment use'* only in exceptional circumstances and where the use would not result in a loss of land or a significant reduction in jobs.
- 4.4 Policy EM2 allows for non-employment uses where they support the area's economic function. Thames Properties support the allowance in the policy for uses that are ancillary to the main economic function. The supporting text at paragraph 4.3.11 of the Local Plan explains that:
- 'In order for these areas to maximise their contribution to the economy, there may be scope for inclusion of uses that are not strictly within an 'employment' classification...in order to support the economic role of the area, for instance through the provision of services and facilities for workers and customers.'*
- 4.5 The supporting text therefore allows sufficient flexibility to introduce additional uses within the CEA that are ancillary to – and complement – the overall employment designation. This supporting text would be better placed in Policy EM2 itself to justify the provision relating to non-employment uses within the CEA and provide greater clarity for the Applicant and decision maker.
- 4.6 Thames Properties envisage that the Richfield Avenue CEA could be more effectively utilised to incorporate more non-traditional employment uses to serve and sustain the wider CEA. Such uses would be ancillary to the main employment provision within the site and could include uses such as convenience retail provision, food and drink outlets, leisure facilities such as a gym or hotel. There may also be scope in the CEA to include a small amount of residential accommodation to contribute to meeting Draft Local Plan Objective 3.

4.7 Thames Properties therefore support the flexibility within the wording of Policy EM2 and agree that the provision relating to non-employment uses within the policy is justified but only when read alongside the supporting policy text at 4.3. 11. As above, we suggest that this wording should be incorporated into Policy EM2. Thames Properties would also welcome greater clarity in the definition of how the Council will measure whether there has been an overall loss in the level of employment land, and how '*employment land*' is quantified, particularly considering the discrepancies between the wording of Policies EM2 and EM3 set out above.

5.0 Q3. Is Policy EM3 worded to ensure that it would be effective and provide a clear indication of how a decision maker should react to a proposal? Is the approach consistent with national policy?

5.1 Thames Properties welcome RBC's proposed modifications to Policy EM3 but highlight concerns regarding the practical application of the policy given the wording as drafted.

5.2 Firstly, the Policy states that '*Within the Core Employment Areas, the overall level of employment land should be maintained. Proposals that would result in the loss of such land will not be permitted.*' Further clarity is required to explain whether 'employment land' refers to area coverage within the CEA, floorspace of buildings or number of jobs, and to explain how the Council will, in practice, quantify any potential loss of employment land through proposals to introduce alternative uses within the CEAs.

5.3 Secondly, further clarity is needed regarding the following sentence: '*Where, in exceptional circumstances, it can be demonstrated that a site in a Core Employment Area has no long-term prospect of employment use, a related alternative commercial use or a use ancillary to the main employment use may be considered...*'. As drafted, the Policy implies that the 'exceptional circumstances' test in the policy would be fulfilled in instances where it can be demonstrated that a site within a CEA has no long-term prospect of employment use.

5.4 As set out in the representations to the Regulation 19 stage of consultation on the Local Plan, Thames Properties support the principle of RBC allowing for 'exceptional circumstances' where ancillary or alternative employment uses may be considered acceptable in the CEAs. However, if the exceptional circumstance and the prospect of no long-term use are one and the same matter, there is no longer a requirement to include the reference to 'exceptional circumstances'.

5.5 Thirdly, Policy EM3 states '*...a related alternative use or a use ancillary to the employment use may be considered that would not result in a significant reduction in jobs.*' This test is inconsistent with the first half of EM3 and Policy EM2 which states that proposals will be assessed against whether there is an overall loss of employment land.

5.6 Thames Properties support RBC's amendments to the wording of Policy EM3 in line with the representations submitted to the Regulation 19 Local Plan consultation. However, Thames Properties suggest the following amendment to the policy wording as shown below (struck-through) to ensure consistency with the first half of the Policy and Policy EM2 and to remove any ambiguity in the application of the policy in line with the requirements of paragraph 16(d) of the NPPF (2018):

~~'Where, in exceptional circumstances, it can be demonstrated that a site in a Core Employment Area has no long-term prospect of employment use, a related alternative commercial use or a use ancillary to the employment use may be considered. that would not result in a significant reduction in jobs.'~~

5.7 The wording above would potentially allow in future for CEAs that are no longer fulfilling their purpose as a location for traditional employment uses to accommodate alternative uses that would enhance the vitality and viability of their areas, through a more adaptable policy.

5.8 The NPPF seeks to build a strong, competitive economy and encourages planning policies to be '*flexible enough to accommodate needs not anticipated in the plan...and to enable a rapid response to changes in economic circumstances.*' (paragraph 81(d)) and '*recognise the specific locational requirements of different sectors.*' (paragraph 82).

5.9 Policies EM2 and EM3 must therefore allow for changing economic circumstances within CEAs, particularly in areas such as Richfield Avenue where the Local Plan evidence base already suggests that vacancy rates are high and there is little demand for traditional employment uses in that location. Such flexibility in the policy wording would respond better to national policy requirements and support the introduction of alternative, ancillary uses within the CEAs that could compliment or enhance the overall employment function of the area without undermining its economic function.

6.0 Q4. Is Policy EM4 justified and does it effectively cover the needs of small businesses in the area?

6.1 No comment.