

Louise Gibbons
Inspector appointed to examine the Reading Local Plan
C/o
Programme Officer
Planning Section
Reading Borough Council
Civic Offices
Reading, RG1 2LU

BY POST AND E-MAIL: Programme.Officer@reading.gov.uk

17127/A3/RM/SC

11 September 2018

Dear Ms Gibbons,

STATEMENT OF AVIVA LIFE AND PENSIONS UK LTD (AVIVA INVESTORS) AND READING BOROUGH COUNCIL

Following our correspondence on the forthcoming Local Plan Examination we set out our response on behalf of our client, Aviva Life and Pensions UK Ltd. (hereafter referred to as Aviva Investors).

Figure 5.1 Area Strategy for Central Reading

Comments were raised regarding the ambiguity of Figure 5.1: Area Strategy for Central Reading compared to the Proposals Map in January 2018. The representation stated *"Whilst the principle behind the purpose of the figure is supported, the graphics and the scale of the plan, even when read alongside paragraph 5.2.11 – 5.2.4, result in some uncertainties over interpretation. These uncertainties were raised in June 2016 during the previous consultation and the plan remains unchanged. We consider that figure 5.1 should be clarified as for example, we note that land north of Reading Station is not entirely covered by 'for retail' or 'for offices' and Forbury Retail Park only partially lies within a concentration 'for retail.'"*

Following this submission, we understand that Reading Borough Council (RBC) has suggested a minor change to the wording of Figure 5.1 so that it removes this uncertainty. Below is the suggested change:

*"Concentration of retail**

*Concentration of office**

*Concentration of leisure uses**

- *Location of concentrations are approximate only – please see definitions on Proposals Map"*

Both parties agree that the changes made resolve the concerns raised by Aviva Investors in relation to Figure 5.1. It is also considered that this change would help improve clarity and weight afforded to Figure 5.1.

Representations made regarding the wording of other policies within the Local Plan remain as submitted in January 2018.

Aviva Investors owns a number of sites within the Borough. The representations made throughout this Local Plan process refer to their following land ownerships:

- Reading Station Shopping Park, Vastern Road – CR11e: North of the Station
- Forbury Retail Park (Phase 3) – CR13b/c Forbury Retail Park; and
- 52-55 Friar Street and 12 Greyfriars Road – CR11b Greyfriars Road Corner
(The Council's (RBC) adopted AAP supports the redevelopment of all these sites for high density mixed use development.)

Inspector's Matters & Issues for Examination

Following circulation of the Inspector's Matters & Issues for Examination, Aviva Investors considers it helpful to outline their development aspirations for their three sites, especially in relation to the questions raised regarding **Matter 10: Central Reading** and most specifically **Question 17 – /s Policy CR13b requirement for residential development deliverable and based on robust evidence?**

Many UK retail parks are facing an uncertain future with a number of UK retailers now operating from stores which are too big for their operational needs. Aviva Investors is committed to turn such sites they own into vibrant residential-led mixed-use developments. However, it can take time to work with tenants to reach an agreement in order to facilitate redevelopment of the site, As such these sites are more likely to be delivered over a medium to long term compared to other less constrained sites.

Aviva Investors considers that such close cooperation with its tenants can ultimately deliver a vibrant redevelopment. On many occasions the aspiration is to work closely with the tenants to reinstate their presence in the redeveloped scheme as this is a benefit to both the tenant (by occupying a modern premise fit for their offer), local area and for Aviva Investors in reducing the development risks by improving income stream.

Reading Station Shopping Park, Vastern Road – (Part of allocation CR11e: North of the Station)

The "Station Shopping Park" comprises 6,969 sq. m. (5 units) of Class A1 floorspace. It is made up of 5 units, which are presently let to the retail operators. Aviva had considered the redevelopment potential of its site in c.2008/9 (before the recession and following adoption of RBC's Core Strategy). The conclusion reached at the time was that progressing a redevelopment was not financially viable and deliverable. However, at the time of submitting this Hearing Statement (10 years later) the circumstances have changed significantly. The existing leases on the Shopping Park are all now much closer to expiring (between 2021-2025), land values have increased and are anticipated to increase further post 2019/20 when Crossrail is fully operational.

Aviva's development aspirations are to bring forward a planning application which is broadly consistent with the policy allocation and the Reading Central Area Action Plan in the short term (2018/2019) with the scheme being delivered in the medium term in line with the expiry of the leases (2021-2025). Draft proposals have been prepared and have been subject to high level discussions with the Council. It is considered that proposals for the site are likely to deliver approximately 600-800 dwellings together with a range of uses on the lower levels.

Forbury Retail Park (Phase 3) – (Part of allocation CR13b Forbury Retail Park);

Forbury Retail Park comprises 4,645 sq. m. (4 units) of Class A1 floorspace (restricted) with all units fully occupied with long term leases secured. The allocation indicates that the Council considers there to be potential for between 1,230- 1,840 dwellings for the whole allocation. Aviva Investors agree with this estimate but consider it to be slightly conservative, although it is

acknowledged that the Council requires the redevelopment of this overall allocation to provide open space and other onsite contributions which will reduce the developable footprint.

The policy wording CR13b states *'Some parts of the site are likely to be implemented in the long term'*. We presume that this wording may be the reason for the Inspector's query regarding the likely deliverability of the allocation.

It is considered that the policy wording is appropriate and reflects representations made by Aviva Investors during the drafting of the Local Plan. These representations requested that an equitable approach to the allocation be clarified due to the various landowners within one allocation. It was considered likely that the various landowners within the allocation would bring forward their sites at different timescales and be the subject of piecemeal planning applications. There was a need to ensure that such individual applications do not prejudice the ability of adjoining owners to bring forward schemes in a co-ordinated and controlled way.

Policy CR13 vii) seeks to clarify this point and as such Aviva Investors welcomes the additional wording inserted within this policy. It is considered that the acceptance that some parts of the site are likely to be implemented in the long term is the Council's acknowledgment that although the commercial units are fully occupied with retailers successfully operating from this location (with no commercial reason to change this at present) there is a willingness by landowners to work with the Council and redevelop their site(s) in the medium-long term.

52-55 Friar Street and 12 Greyfriars Road, Reading (CR11b Greyfriars Road Corner)

The allocation wording indicates that the indicative potential for 90-140 dwellings, office, retail and leisure (no significant net gain assumed). On 20th March 2018 planning permission was obtained by Aviva Investors for the significant redevelopment of the site for the *'Demolition of existing building and structures (Class A1) and erection of 3 new buildings ranging between 6-12 (and basement) storey in height to provide 135 (1xstudio, 54x1, 73x2 and 7x3-bed) residential units (Class C3), a flexible Class A1-5, B1(a) or D2 (gym only) use at ground floor level fronting onto Greyfriars Rd, with associated access, parking, servicing, landscaping and engineering works'*.

Discussions with the existing tenant are currently underway with a view to bring forward the redeveloped scheme in due course.

We trust you find this letter (in addition to the earlier representations made) helpful in understanding the position by Aviva Life and Pensions UK Ltd., position and development aspirations for their land ownerships within the Borough.

Yours sincerely,


ROBIN MEAKINS
Senior Planning Partner

Cc: Aviva Investors
Mark Worringham, Team Leader, Planning Policy Team, Reading Borough Council