



# Gas Holder, Reading Reading Borough Local Plan Examination

Response to Inspector's Matters & Issues for Examination  
Matter 4 – Central Reading

**Boyer**

## Report Control

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## **APPENDIX**

Appendix 1 – Photographs of service gangway to east of CR13d (unsuitable for public access)

# 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 4: Central Reading.

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## 2. MATTER 4: CENTRAL READING

**Issue 10: Are the policies for Central Reading justified, deliverable and consistent with national policy?**

**Q5. Is Policy CR6 justified and will it be effective? How will the restrictions set out in paragraph 5.3.27 in respect of serviced apartments be effectively applied?**

2.1 Policy CR6(i) is not effective as currently worded. The policy states that:

*“...Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/ studios, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable.”*

2.2 The use of “*ideally*” and “*as a guide*” suggests that the stated percentages would be strongly preferred by the Council but infer a degree of flexibility (e.g. to reflect site-specific circumstances), however the inclusion of “*unless it can be clearly demonstrated that this would render a development unviable*” suggests that the policy will be applied more strictly and would appear to contradict the inferred flexibility above. This disparity in the wording leaves room for confusion which raises questions as to whether the policy will be applied consistently in practice.

2.3 If viability is the sole reason that a departure from the percentages above would be accepted by RBC, then the use of “*ideally*” and “*as a guide*” in the policy wording is superfluous. However, their inclusion suggests that these percentages are intended to be applied with a degree of flexibility, and so the policy should be reworded accordingly to ensure it is effective. This would also ensure the policy is adaptable to changing conditions and market demands, to ensure that it remains effective over the whole plan period.

2.4 It is therefore recommended that the policy wording be amended as follows (new text underlined, deleted text ~~struck through~~):

### CR6: LIVING IN CENTRAL READING

*Proposals for residential development within the central area will be assessed against the following criteria:*

*i) All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/studios, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that ~~this would render a development unviable~~ an alternative site-specific mix would be more appropriate.*

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## Site Allocations – Central Reading

### **Q18. Are the requirements in Policy CR13d justified?**

- 2.5 Whilst minor amendments have been made to CR13d since the consultation on the Pre-Submission Draft Local Plan, SGN as advised by Danescroft are still concerned that not all of the requirements in Policy CR13d are justified.

*“Development should enhance the character of the mouth of the Kennet...”*

- 2.6 The redevelopment of the Gas Holder site presents a valuable opportunity to provide a new river gateway to Reading and enhance the character of this part of the River Kennet. The site itself is however located approximately 180 metres to the south-west of the true ‘mouth’ of the Kennet where it joins the River Thames and so the degree to which the development of the site will influence the character of the mouth of the Kennet itself is limited. A suitable alteration to the policy wording is therefore proposed below to reflect this.

*“Public access along the river will be sought”*

- 2.7 Whilst it is agreed that the redevelopment of the Gas Holder site should provide public access along the river within the site, and continue existing pedestrian and cycle access from the rest of the East Side Major Opportunity Area (MOA) to the west, it is noted that the initial criteria at the start of Policy CR13 also include that development in the East Side MOA will:

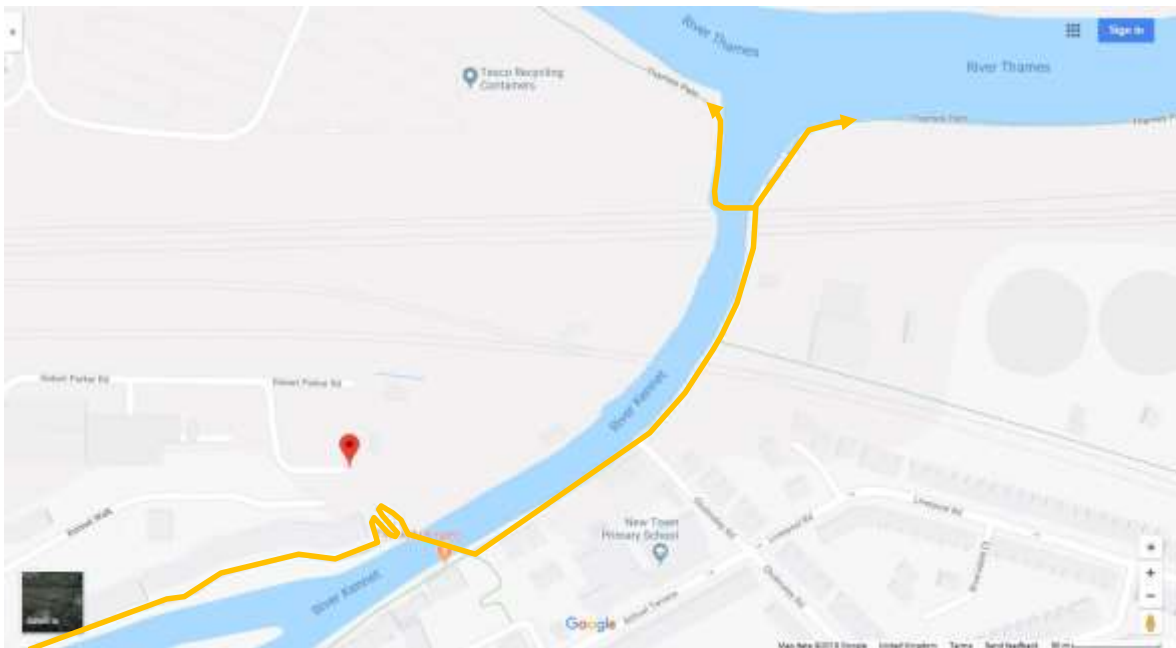
*“Maintain, improve and create new access along the north side of the River Kennet to the Kennet Mouth”*

- 2.8 As discussed in our previous representations, land required to provide a continuous pedestrian connection “to the Kennet Mouth” beyond the Gas Holder site to the north-east (as indicated by the dotted purple line on Figure 5.5.) extends beyond the East Side MOA itself and crosses unregistered land which is outside any of the respective landowners’ and/or developers’ control, and therefore not within their or the Council’s control.
- 2.9 Continuous public access along the northern side of the River Kennet up to the Kennet Mouth would also require the existing railway to be crossed twice, as the Waterloo and Paddington lines have already started to diverge by this point. The Council consider that this “public access could be created under existing railway bridges using existing openings, so new tunnels and bridges are not required”.<sup>1</sup> However, at the very least a new bridge would be required immediately to the west of the Gas Holder site, where at present there is only a metal service gangway which SGN have the right to use for maintenance purposes only (but does not fall within its ownership) (photographs enclosed at **Appendix 1**).

<sup>1</sup> Statement of Consultation on the Draft Local Plan’ (RBC, November 2017) (LP012)

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- 2.10 There would also be safety concerns about providing public access to the unused land which falls between the two railway lines, which would have no natural surveillance and would also potentially cause a security risk to the railway itself.
- 2.11 There is also an existing continuous connection to either side of the Kennet Mouth available which connects to the Thames Path and offers a safer and more suitable route for pedestrians, as highlighted in yellow on the plans below. Although this involves crossing the river, this in itself adds interest to the route, and so it is unclear why continuous access along the northern side of the Kennet is also required.



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- 2.12 The requirement to create new access along the north side of the River Kennet to the Kennet Mouth in Policy CR13 is therefore unjustified and unnecessary.

*“Development should be set back at least ten metres from the top of the bank of the river...”*

- 2.13 It remains unclear how the proposed set back of 10 metres has been derived and so this requirement is currently unjustified. This is fundamental given the implications for the potential developable area of the site.
- 2.14 It is considered that in certain circumstances a reduced set back would still allow the creation of a wildlife corridor along the river, whilst ensuring a more effective and efficient use of land. This is particularly important on previously developed sites within the urban area such as this, as encouraged by paragraph 17 of the 2012 NPPF, particularly given the significant costs associated with redeveloping sites such as this.
- 2.15 The Statement of Consultation on the Pre-Submission Draft Local Plan (November 2017) (LP006) states that the *“10 metre requirement has been strongly advocated by the Environment Agency...as being a minimum distance to ensure the biodiversity value of the river bank”*. It is not clear however how the Environment Agency have derived a figure of 10 metres or upon what evidence this advocated figure is based.
- 2.16 We concur that development of the site should allow for a wildlife corridor along the river. Given the limited developable area available on the Gas Holder site however, it is recommended that degree of flexibility be incorporated into the policy wording itself in the absence of any specific evidence justifying the 10 metre figure.

#### Recommendation

- 2.17 For the reasons set out above and in our Statement in response to Matter 2, it is recommended that Policy CR13 be amended as follows (new text underlined, deleted text ~~struck through~~):

*CR13: EAST SIDE MAJOR OPPORTUNITY AREA*

*Development in the East Side Major Opportunity Area will (...)*

*ix) Maintain, improve and create new access along the north side of the River Kennet ~~to the Kennet Mouth~~; and (...)*

*CR13d, GAS HOLDER:*

*This area will be used for residential development. Development should enhance the character of ~~the mouth~~ of the Kennet and should maximise the potential of the site to be a river gateway to Reading. Public access along the river will be sought. Development should be set back at least ten metres from the top of the bank of the river wherever possible and allow for a wildlife corridor along the river. Development should take account of potential contamination on the site.*

*Site size: 0.71ha Indicative potential: ~~46-70~~ 100-130 dwellings*

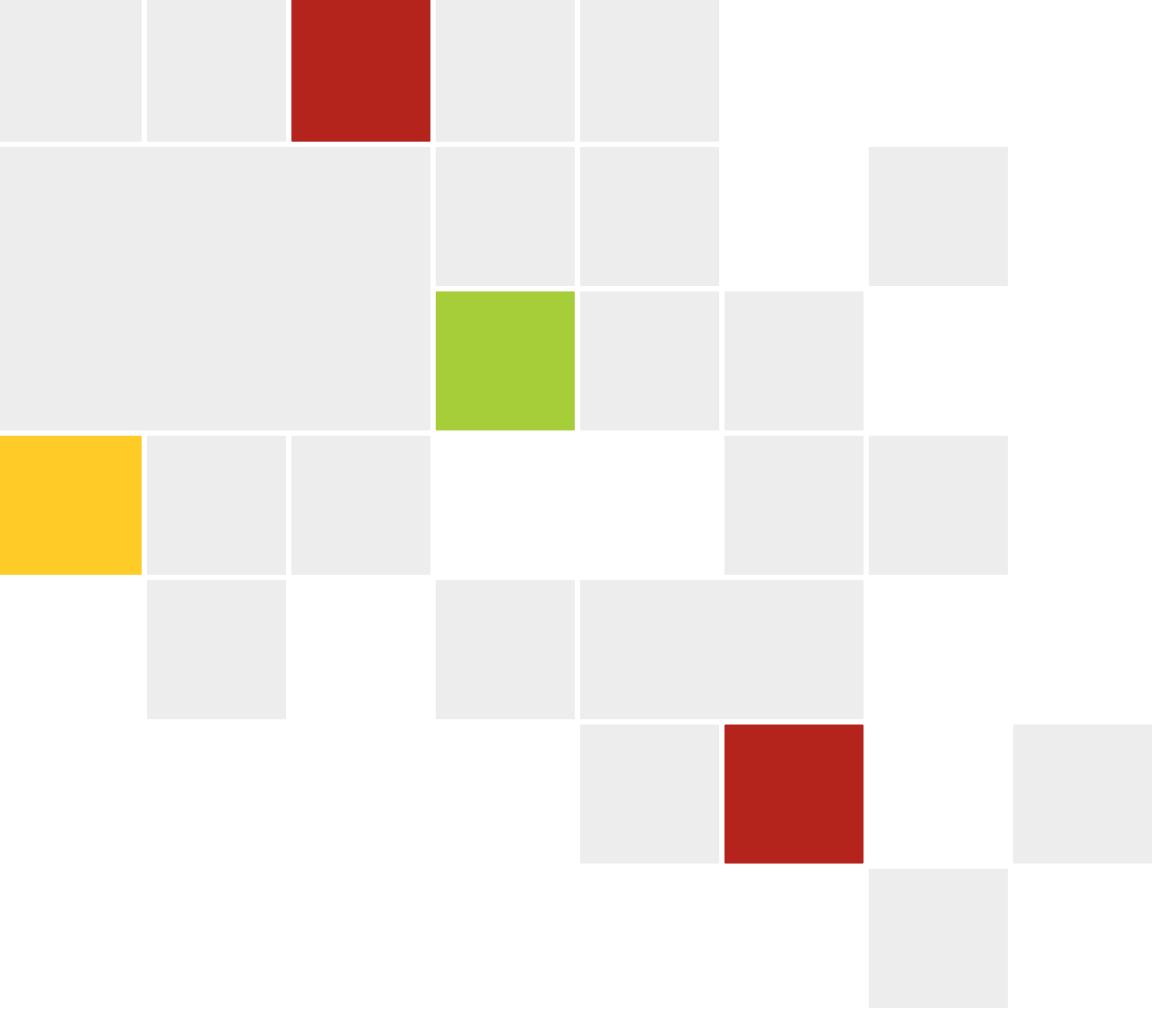
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**APPENDIX 1 – PHOTOGRAPHS OF SERVICE  
GANGWAY TO EAST OF CR13D (UNSUITABLE  
FOR PUBLIC ACCESS)**







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