

Hearing Statement Examination of the Reading Borough Local Plan

Issue 12 – West Reading and Tilehurst

Tilehurst Poor's Land Charity

12 September 2018

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1.0 Introduction

1.1 This Hearing Statement has been prepared by Lichfields, on behalf of Tilehurst Poor's Land Charity (hereafter 'the Charity') (our clients). They control land at Kentwood Hill elements of which are identified in the Submitted Draft Reading Borough Local Plan (RBLP) under policies WR3t, WR3s and EN7Wu¹.

1.2 This Statement responds to questions identified by the Inspector in relation to Issue 12 in the Matters & Issues for Examination. Specifically, it responds to the Inspectors queries (Issue 12 Question 6) as to:

- What is the justification for two separate policies for WR3s and WR3t? and
- Is the allocation of these sites justified and consistent with other policies within the LP?

Background and Context

1.3 The Tilehurst Poor's Lands Charity was initially created to provide fuel for the poor of the Parish. Over time the Charity's aims have broadened to provide support for those in need within Tilehurst, with the provision of grants to local people to provide much needed items such as furniture, clothes or white goods. As the name suggests, the Charity owns land, some of which has been sold and the proceeds invested, so that the Charity's income comes from both investments and rents.

1.4 The Charity owns land at Kentwood Hill, Tilehurst, as shown on the submitted Site Location Plan which, as we summarise below, has long been recognised as a potential development location.

Current Uses

1.5 The land ownership extends to 6.6ha in total and comprises the following land uses (which are identified on the Site Location Plan attached at Annex 1):

- 1 Builder's Yard
- 2 Non-Statutory Allotments²
- 3 Recreation Ground
- 4 Two areas of grass/scrubland
- 5 Tree filled area

1.6 The site is located in a residential area, less than 130 metres from the local centre (the Tilehurst Triangle) which provides a wide range of local services and amenities. It is well served by public transport and in close proximity to a number of facilities including schools and GP surgeries.

1.7 As recognised within the RBLP the site's location and proximity to services means that it forms a highly sustainable location which is capable of providing much needed additional housing (including family housing) in Reading.

1.8 As noted above our client's specific interest relates to Local Plan site refs. WR3s, WR3s and EN7Wu. Lichfields have submitted representations on behalf of our clients throughout the

¹ Policy WR3s – Land at Kentwood Hill. Allocation for 41-62 dwellings

Policy WR3t – Land at Armour Hill. Allocation for 12-18 dwellings

Policy EN7Wu – Victoria Recreation Ground and Kentwood Hill Allotments – allocated as Local Green Space.

² The non-statutory allotments are not afforded any statutory protection and absent any planning policy protection (as now proposed within the RBLP) are not protected from this use terminating

evolution of the RBLP - most recently to the Pre-Submission Draft Local Plan Consultation in January 2018.

1.9 As summarised in our January 2018 representations (which we do not seek to repeat here) our representations were also accompanied by a dialogue with Reading Borough Council (RBC) Officers whereby RBC proposed, and our clients accepted, the approach taken in the Local Plan of the recreation ground, allotments and tree filled areas being retained as open space, with the remaining areas of the site allocated for residential development³.

1.10 In addition, these earlier representations included Indicative Masterplans, Ecological Appraisal, Site Access Appraisal and a Initial Landscape and Visual Appraisal (the indicative masterplans are contained at appendix 2 and the Charity are happy to make the additional material available to the Inspector directly if this would be helpful). This analysis, which has been drawn on by Reading Borough Council (RBC) in assessing and allocating the site demonstrates the extent of technical work which underpins the assessment made by RBC that it is appropriate to allocate the site for residential development.

Scope of Hearing Statement

1.11 In response to the questions raised by the Inspector this Statement:

- Sets out the evolution of residential development proposals on the site (including through the RBLP process) – Section 2.0
- Summarises the rationale for the sites allocation – Section 3.0; and
- Comments on the potential implications of the two separate policies for WR3s and WR3t (emphasising that our clients do not contest the approach taken within the RBLP) – Section 4.0.

³ Whilst not forming part of these representations The Charity supports the residential allocation of WR3s and WR3t at the higher end of the proposed capacities identified (62 and 18 respectively) and notes the comments made in the RBLP (para 7.3.13) that *“the capacity of sites will ultimately depend on various factors that need to be addressed at the application stage”*

2.0 **Evolution of Residential Development Proposals**

2.1 Prior to the current RBLP process our clients site was previously included within the initial iterations of the RBC Sites and Detailed Policies Document (SDPD).

2.2 The previously developed area of the site (the builder's yard) was then the subject of considerable discussion and analysis during the preparation of the Sites and Detailed Policies Document (SDPD) where it was initially identified for residential development for 11-17 dwellings (Policy SA8 of the draft SDPD). However, the allocation was excluded from the SDPD (adopted October 2012) upon the recommendation of the Inspector who considered it would result in piecemeal development that would not address the future of the wider site.

2.3 Specifically, in relation to Policy SA8, the Local Plan Inspector stated:

“Both the site allocated in the DPD and the enlarged site advanced by the site owner would result in piecemeal development that is not well related to the surroundings. There would be uncertainty as to the future of surrounding parcels of land. A comprehensive approach is required that deals with all the land between Kentwood Hill and Armour Hill (including the builder's yard, unused land, the allotments, and playing field) having regard to the needs of the area.”

2.4 The SPDP Inspector's key consideration in resisting the allocation is that it represented piecemeal development and should instead have been considered holistically with the surrounding parcels of land (namely the recreation ground, allotments and scrubland/tree area). He did not question the overall suitability of this location for residential development – indeed the proposed allocations within the RBLP now deliver the “*comprehensive approach*” sought by the earlier Inspector.

Progression of sites within the RBLP

2.5 Our client's landholding was initially identified with the RBLP Issues and Options Consultation Document (January 2016) as a Suggested for Site Development and our clients responded to this supporting the inclusion of elements of the wider landholding for residential development.

2.6 The landholding was subsequently assessed within the in the RBC Housing and Economic Land Availability Assessment (HELAA) (November 2017) as site KE008. The HELAA identifies that the site is available and potentially suitable for residential development with the allotments retained and residential development on the two parcels of land at Kentwood Hill and Armour Hill.

2.7 As then set out in the Local Plan Background Paper (document ref. EV002), a number of options were considered in relation to the allocation of the site (which has then been identified as Land at Kentwood Hill and Land at Armour Hill). In relation to both sites the Council states not allocating the sites “*would fail to make use of a deliverable/developable site to help meet needs for housing.*”

2.8 As the whole site (which is under our client's ownership) has been put forward as part of the Local Plan, this represents an opportunity for a comprehensive approach for the whole of the site, including the allocation of the open spaces the Council wishes to seek to protect. This process lead to the allocation of the site (under policies WR3s, WR3t and EN7WU) within the April 2017 Local Plan, which our clients supported.

- 2.9 Our clients continue to support the approach taken by RBC and the proposed allocations of the site arising under policies WR3s, WR3t and EN7Wu.
- 2.10 A number of the consultation responses to the Draft Local Plan stage related to the retention of and access to the allotments. In response to this, the text within Policy WR3t was amended to ensure there is no reduction in vehicle access to and parking for the allotment.
- 2.11 This is retained in the final wording within the Submission Draft RBLP.

3.0 **Justification for Allocations**

3.1 The Inspector asks within Question 6 *“Is the allocation of these sites justified and consistent with other policies within the LP?”*

3.2 At the outset we would emphasise that the Charity commends the overall approach taken by Reading Borough Council (RBC) in assessing the evidential technical basis for residential development on the site drawing in part on the substantial technical work undertaken by our clients as landowner (submitted as part of our June 2017 representations) which underpins the allocations of the site and confirms that the specific requirements identified for both residential allocations are entirely capable of being met.

3.3 The allocation arises from a process whereby RBC have:

- i assessed the OAN for additional housing over the plan period;
- ii through their evidence base sought to identify appropriate sustainable locations to assist in meeting this housing need;
- iii engaged with the Charity (as landowner) and the technical evidence base that the Charity have undertaken, in formulating three allocations (two for residential development and the third for the retention of recreation space / allotments) to ensure that the resultant residential allocations result in a scheme which is deliverable; and
- iv reviewed the consultation responses to, where possible, seek appropriate amendments to the wording of the policies to address matters that have been raised.

3.4 We briefly expand upon these in turn.

Housing Need

3.5 The 2012 NPPF⁴⁴ (para 159) sets out the approach for allocating sites for development stating that this should be informed by a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment. (SHLAA).

3.6 The Berkshire Strategic Housing Market Assessment (SHMA) (published February 2016) assessed the level of new housing required within RBC and the other Boroughs and Districts within the former Berkshire Authority. This identified a full objectively assessed housing need for RBC of 699 homes a year. The adopted development plan pursues a lower annual housing target of 521 dwellings per year in the period 2016 – 2026 (policy CS 14) such that the emerging Local Plan requires a substantial uplift in housing delivery.

3.7 Emerging Policy H1: Provision of Housing identifies that the emerging plan will make provision for at least an additional 15,433 homes (averaging 671 homes per annum) in the Borough for the period 2013 to 2036. This level of delivery means there will be a shortfall over the plan period of 644 dwellings against the objectively assessed need. As set out in para 4.4.3 of the RBLP *“Reading is a very tightly defined urban area, and sites for new development are limited.”*

3.8 The level of housing provision proposed within the emerging Local Plan means that RBC is not seeking to meet its housing needs in full within the Borough boundaries and has sought cooperation from the surrounding Boroughs.

⁴⁴ Which is applicable as the RBLP was submitted for examination before January 2019 and therefore the policies of the NPPF (2012) apply (NPPF July 2018 para 214).

- 3.9 In this context it is crucial that the proposed allocated sites are developed to their full potential (having regard to development management considerations) to ensure that the Plan seeks the highest achievable level of housing delivery. The emerging plan recognises this (para. 4.4.6) stating “*it is important that efficient use is made of the land that is available to boost the delivery of new homes.*”

Identification and Evolution of Housing Allocations

- 3.10 Section 2.0 of this Statement has set out the approach taken by RBC to identify residential allocations within the Borough to meet this need.
- 3.11 Specifically this approach has focussed on the HELAA (2017) and a dialogue with the relevant landowners to better understand the development potential of the relevant sites.
- 3.12 In this context RBC have appraised and then drawn on the technical evidence put forward by our clients in the assessing the accessibility, sustainability, site access, landscape and ecological features of the site.
- 3.13 Our clients have then drawn on this analysis to prepare two indicative masterplans (Appendix 2) to gauge the capacity of the site. Again RBC have assessed and drawn on this in their assessment of the potential capacity of both residential allocations.
- 3.14 Finally as noted above RBC have then reviewed the comments received at the earlier consultation stages and, where possible, sought amendments to the draft allocations to address matters raised.

Conclusion

- 3.15 The Charity therefore consider that this process, which has lasted nearly three years, has resulted in two residential allocations within their landholding which will result in a form of residential development which is deliverable, drawn from a robust evidence base, and which will result in a number of benefits.
- 3.16 This include delivering much needed housing (including family housing) in a sustainable location, avoiding the “*piecemeal development*” that the SDPD Inspector was concerned about and providing policy protection for the recreation ground and allotments within our clients landholding.

4.0 **WR3s and WR3t**

4.1 Finally we note that the Inspector asks within Question 6 “*What is the justification for two separate policies for WR3s and WR3t?*”

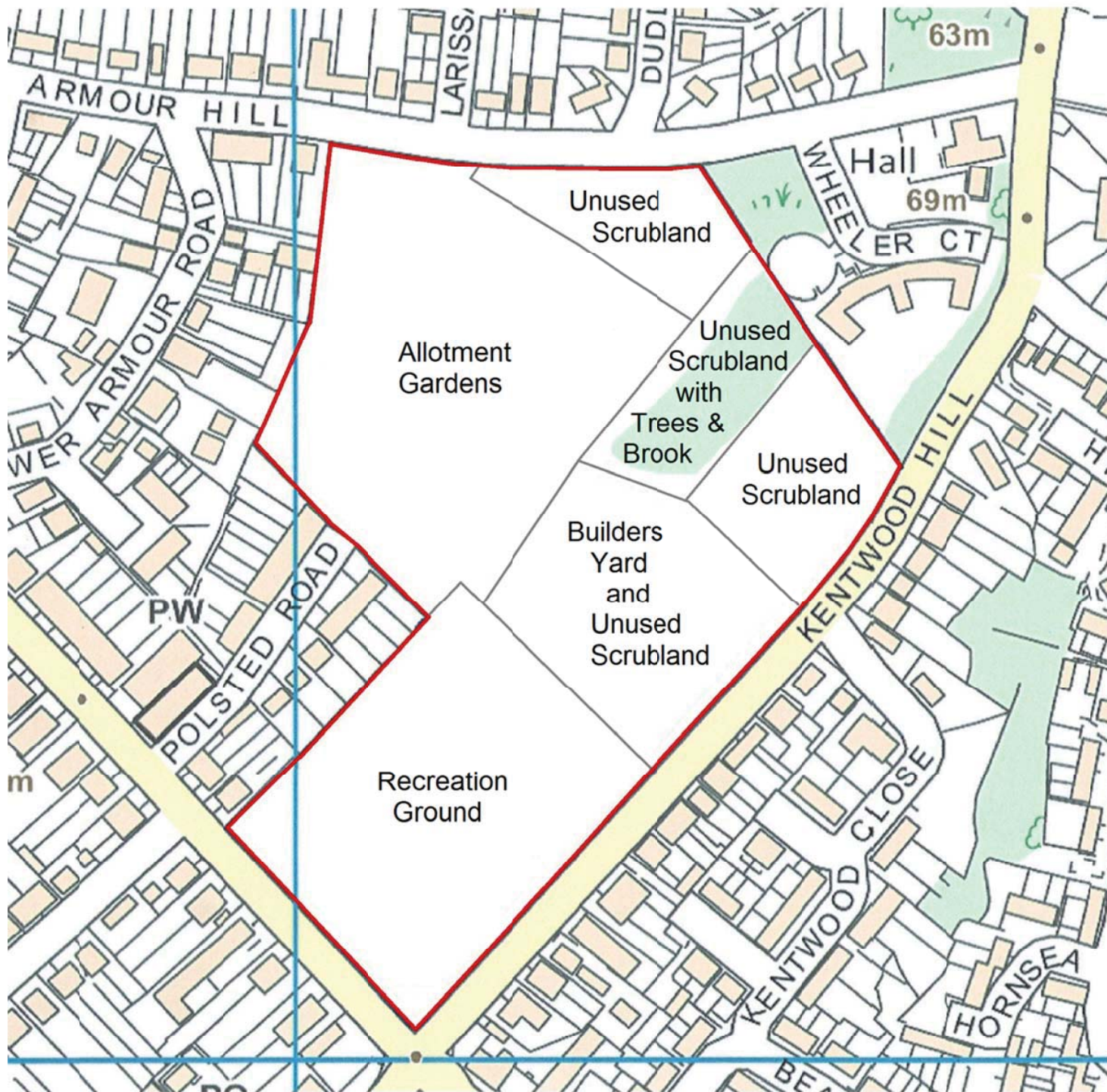
4.2 Ultimately this is a matter for RBC to address. Our clients would emphasise however that they have been aware of RBCs proposal to progress in this way through the latter stages of the emerging RBLP. Importantly they do not feel that it prejudices either their position or the deliverability of one or both residential allocations

4.3 Although within the same ownership, the two areas of the wider site (sites. WR3s and WR3t) are separated. The criteria of the two policies are similar, but do have some differences, and therefore we understand because of this that the Council’s preferred approach is to keep the two allocations separate.

4.4 The two sites proposed for housing have separate access points, and could be brought forward through a single or two separate planning permissions.

4.5 As a charity, our clients have responsibility to the Charities Commission to obtain best value for their assets. Having assessed the implications arising from these two separate policies they are content that the flexibility that they require is not fettered.

Appendix 1: Site Location Plan



Key:

- Candidate Site for Housing with some provision for community leisure space

Land at Kentwood Hill, Armour Hill, Polsted Road and Armour Road in Tilehurst, Reading

Landowner:
 Tilehurst Poor's Land Charity
 (Regd Charity No. 204048)

Drawing:
 Site Location Plan

Scale:
 Approx 1:2000 @ A3

Date:
 October 2015

Appendix 2: Indicative Masterplans



Key

Site Boundary



Project Kentwood Hill

Title Indicative Sketch Layout

Client Tilehurst Poor's Land Charity

Date 27.02.2017

Scale 1:1000 @ A3

Drawn by LH

Dwg. No PS15691-002



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Key

Site Boundary



Project Kentwood Hill

Title **Option 2: Indicative Sketch Layout**

Client Tilehurst Poor's Land Charity

Date 01.03.2017

Scale 1:1000 @ A3

Drawn by LH

Dwg. No PS15691-003



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Bristol

0117 403 1980
bristol@lichfields.uk

Cardiff

029 2043 5880
cardiff@lichfields.uk

Edinburgh

0131 285 0670
edinburgh@lichfields.uk

Leeds

0113 397 1397
leeds@lichfields.uk

London

020 7837 4477
london@lichfields.uk

Manchester

0161 837 6130
manchester@lichfields.uk

Newcastle

0191 261 5685
newcastle@lichfields.uk

Thames Valley

0118 334 1920
thamesvalley@lichfields.uk