
Reading Borough Local Plan Public Examination

Response to Inspector's Matters and Issues
On behalf of University of Reading (UoR)

Issue 13
Caversham and Emmer Green

September 2018

**Reading Borough Local Plan
Public Examination**

Response to Inspector's Matters and Issues

Issue 13:

Caversham and Emmer Green

Barton Willmore LLP on behalf of the University of Reading

Project Ref:	25914/P7/A5	25914/P7/A5	25914/P7/A5
Status:	Draft	Draft	Final
Issue/Rev:	P7	P7a	P7b
Date:	31 st August 2018	7 th September 2018	12 th September 2018
Prepared by:	Jonathan Locke	Jonathan Locke	Jonathan Locke
Checked by:	Nick Paterson-Neild	Nick Paterson-Neild	Nick Paterson-Neild

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

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

Ref: 25914/P7b/A5/JL/NPN/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.

CONTENTS

Page

Introduction 1

Response to Inspector's Questions – Issue 13 2

APPENDICES

Appendix 1 - Reading Borough Council Email (17th August 2018)

0.0 INTRODUCTION

- 0.1 Barton Willmore LLP is instructed by the University of Reading (UoR) 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 the UoR in response to the relevant Regulation 18 and Regulation 19 consultations on the emerging Reading Borough Local Plan.
- 0.2 This statement does not respond to all questions raised under Issue 13, but focuses on those of particular relevance to the interests of the UoR. 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 13

Issue 13. Are the policies for Caversham and Emmer Green justified, deliverable and consistent with national policy?

1.0 Q1. Is the strategy for the Caversham and Emmer Green justified? Does the strategy appropriately reflect the concerns relating to infrastructure as set out in paragraph 8.2.5 of the LP?

1.1 Yes. The Council's strategy within paragraph 8.2.5 of the emerging Local Plan refers to engaging in discussions with Wokingham Borough Council, Oxfordshire County Council, South Oxfordshire District Council and the Thames Valley Berkshire LEP to work up proposals for additional crossing capacity of the Thames, which could increase public transport capacity on existing crossings and improve traffic issues. The Council considered that a new park and ride site associated with any additional crossing on the A4155 Henley Road would also help to alleviate issues, with further park and ride opportunities on the A4074 Upper Woodcote Road and B461 Peppard Road.

1.2 The University has supported this strategy in previous representations and consider it to be critical to the future of Reading and must be fundamental in terms of strategic infrastructure. This is appropriately reflected in the Council's strategy for Caversham and Emmer Green as outlined within paragraph 8.2.1 of the emerging Local Plan and illustrated within associated Figure 8.1. The proposed new crossing over the Thames would predominantly include areas outside the administrative boundaries of Reading Borough Council and as such will require engagement with and the cooperation of the aforementioned stakeholders. The promotion of such a strategy should be supported in order to encourage other stakeholders to positively engage with the Council to assist its delivery.

Site Allocations – Caversham and Emmer Green

2.0 Q2. Having regard to the effect on flood risk and the requirement for the relocation of the Boat Club, is Policy CA1a justified?

2.1 Yes.

- 2.2 Within the Council's Sequential and Exception Test document (March 2018) the Council state on page 103 of the document, that;
- “Sequentially preferable sites at lower risk of flooding have been considered. These include all Flood Zone 1 sites, and sites with a smaller proportion of the site within Flood Zone 2 and Flood Zone 3 (including when accounting for climate change). After these sites have been considered, there is a remaining need of 651 homes.”**
- 2.3 The Council's approach, leading to the proposed allocation of the Boat Club site under Policy CA1a, would therefore comply with the requirements of the NPPF (paragraph 100) to apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property, and manage any residual risk. The Council's assessment found that sequentially preferable sites have been considered (including those within Flood Zone 1 and sites with a smaller proportion within Flood Zone 2, and Flood Zone 3). The Council confirm that even after such sites have been considered, there remains a significant shortfall in land suitable for housing.
- 2.4 The University has already submitted representations pointing to the significant unmet housing need of some 644 dwellings over the Plan period as demonstration that there are no alternative sites appropriate for housing with lower probabilities of flooding. Following the sequential test detailed in the NPPF at paragraphs 100 - 101, it is clear that the Council is justified to include the Boat Club site as a site for residential allocation.
- 2.5 The draft policy wording requires that the risk of flooding is considered, however, seeks to restrict development to areas within Flood Zone 2. The University considers that the policy should include flexible wording that allows for the potential that technical solutions may be available which could allow a greater development of the Boat Club site without further detriment to flood risk on site or to nearby land uses. On this basis, the University considers the site could potentially accommodate higher than the policy currently refers to (16-25 dwellings), with potential that with appropriate flood risk mitigation the housing number could vary between 16 – 40 dwellings.
- 2.6 With regard to the potential relocation of the Boat Club, the University has submitted representations to clarify that the proposed residential allocation of the site would not be dependent on the relocation of the Boat Club. It is considered that residential development could feasibly co-exist with a retained Boat Club and that any relocation of the Boat Club, if proposed at a later date to increase the residential capacity of the site, would only be proposed where it can be suitably relocated or where its loss is justified in accordance with relevant planning policy.

- 2.7 Barton Willmore, on behalf of the University, has corresponded with the Council concerning the relocation of the boat club and the need for amendment of the current policy text within the first paragraph of Policy CA1a. A response received from the Council on 17th August 2018 (see attached **Appendix 1**) indicates that it would be unlikely that the Council would raise any issue to the above being clarified within the draft policy through the below wording amendments;

"Development for residential, ~~subject to relocation of the boat club~~ Where retention of the existing boathouse is not proposed, development will only be permitted subject to its relocation or clear demonstration that its loss is justified in line with policy RL6 or national policy."

- 2.8 The University consider the abovementioned amendment to Policy CA1a to be appropriate and necessary. Together with the allowance for flexibility that technical solutions could facilitate higher housing numbers on the site (in light of the Council's significant housing shortfall), the University would have no further comments on this policy.

- 3.0 Q3. Is Policy CA1b justified and consistent with the other policies within the LP? Are the site requirements justified by robust evidence? What evidence is there to indicate the future of the golf course will be secured within South Oxfordshire?**

3.1 No comment.

- 4.0 Q4. Are the requirements for Policy CA1d justified?**

4.1 No comment.

- 5.0 Q5. Having regard to the historic environment is Policy CA2 justified and will it be effective?**

5.1 No comment.

Appendix 1

Reading Borough Council Email (17th August 2018)

From: Worringham, Mark
To: [Gemma Care](#)
Cc: [Nick Paterson-Neild](#)
Subject: RE: Reading Borough Local Plan - Examination
Date: 17 August 2018 19:02:05
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image007.png](#)

Gemma

Sorry, it's taken such a long time to respond to this. If you were to suggest something along these lines during the examination process, I can't see that the Council would have too many problems with it.

I am on leave from today until 4th September, but we can pick this back up then if there's anything else to discuss.

Regards

Mark

Mark Worringham

Planning Policy Team Leader

Planning Section | Directorate of Environment and Neighbourhood Services

Reading Borough Council

Civic Offices

Bridge Street

Reading

RG1 2LU

0118 937 3337 (73337 internal extension)

Email: mark.worringham@reading.gov.uk

[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)



From: Gemma Care [mailto:gemma.care@bartonwillmore.co.uk]

Sent: 09 July 2018 16:40

To: Worringham, Mark

Cc: Nick Paterson-Neild

Subject: FW: Reading Borough Local Plan - Examination

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Mr Worringham,

I have been passed your email below for a response.

We note the proposed changes, however we would emphasise that the delivery of residential development on this site is not entirely dependent on the loss or the relocation of the boathouse. Given the scale of the existing building(s) it is considered that it could feasibly co-exist with new residential development, and we are keen that the policy reflects such a scenario as well as allowing for relocation or demolition should this be preferable.

We would therefore like to see the policy reworded to this effect, and suggest the following:

*'Development for residential. **Where retention of the existing boathouse is not proposed, development will only be permitted subject to its relocation or clear demonstration that its loss is justified in line with policy RL6 or national policy.***

We would welcome your thoughts in order that we have a clear understanding of the Council's position prior to commencement of the hearings.

Many thanks

Gemma

Gemma Care

Associate



DDI: [0118 943 0088](tel:01189430088)

M: [0782 481 8289](tel:07824818289)

W: www.bartonwillmore.co.uk

The Blade, Abbey Square, Reading, Berkshire, RG1 3BE



Consider the Environment, Do you really need to print this email?

The information contained in this e-mail (and any attachments) is confidential and may be privileged. It may be read, copied and used only by the addressee, Barton Willmore accepts no liability for any subsequent alterations or additions incorporated by the addressee or a third party to the body text of this e-mail or any attachments. Barton Willmore accepts no responsibility for staff non-compliance with our IT Acceptable Use Policy.

From: Worringham, Mark [<mailto:Mark.Worringham@reading.gov.uk>]

Sent: 28 June 2018 16:20

To: Jonathan Locke <Jonathan.Locke@bartonwillmore.co.uk>

Subject: Reading Borough Local Plan - Examination

Mr Locke

You provided comments on Reading Borough Council's Pre-Submission Draft Local Plan on behalf of the University of Reading, and we wrote to you to notify that the Local Plan was submitted to the Secretary of State on 29th March 2018. We are now working towards an Examination including hearings beginning in September, and would ideally like to identify whether our responses to representations have helped to satisfy some or all of the comments. Inspectors find this can be a useful approach and saves time for all parties at Examination.

I attach a schedule setting out your representations together with Council responses. I also attach a list of any minor changes that have been made to the Local Plan in response to your representations. It would be really helpful if you could let me know please if these go some way to resolving any of your points. Because the plan has been submitted, this is not an opportunity for further comment. If you do not feel that the changes are helpful or appropriate, there is no need to respond as the Inspector into the plan already has your Local Plan comments.

Please let me know if you have any further queries or would like to discuss further.

Regards,

Mark Worringham

Planning Policy Team Leader

Planning Section | Directorate of Environment and Neighbourhood Services

Reading Borough Council

Civic Offices

Bridge Street

Reading

RG1 2LU

0118 937 3337 (73337 internal extension)

Email: mark.worringham@reading.gov.uk

[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)



The information in this e-mail is confidential to the intended recipient to whom it has been addressed and may be covered by legal professional privilege and protected by law. Reading Borough Council does not accept responsibility for any unauthorised amendment made to the contents of this e-mail following its dispatch.

If received in error, you must not retain the message or disclose its contents to anyone. Please notify us immediately quoting the name of the sender and the addressee and then delete the e-mail.

Reading Borough Council has scanned for viruses. However, it is your responsibility to scan the e-mail and attachments (if any) for viruses.

Reading Borough Council also operates to the Protective Document Marking Standard as defined for the Public Sector. Recipients should ensure protectively marked emails and documents are handled in accordance with this standard (Re: Cabinet Office – Government Security Classifications).

Click [here](#) to report this email as spam.