
Reading Borough Local Plan Public Examination

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

Issue 14
East Reading

September 2018

**Reading Borough Local Plan
Public Examination**

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Issue 14:

East Reading

Barton Willmore LLP on behalf of the University of Reading

Project Ref:	25914/P8/A5	25914/P8/A5	25914/P8/A5
Status:	Draft	Draft	Final
Issue/Rev:	P8	P8a	P8b
Date:	31 st August 2018	6 th September 2018	12 th September 2018
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Ref: 25914/P8b/A5/JL/NPN/dw

Date: 12th September 2018

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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 14, 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 14

Issue 14. Are the policies for East Reading justified, deliverable and consistent with national policy?

1.0 Q1. Is the strategy for East Reading justified?

- 1.1 The Council's strategy for East Reading as set out in paragraph 9.2.1 of the emerging Local Plan recognises the need for the development of the University of Reading's Whiteknights Campus in support of the economy and function of Reading. The strategy also recognises the constraints that exist within Whiteknights Campus and the potential constraining factor this could have on further development. The Council's strategy supports the development of carefully managed and purpose-built student accommodation on established university sites. It is also noted that the strategy includes the provision of transport improvements and the provision of around 1,100 homes between 2013 and 2036 (around 7% of the total planned for within the Borough). These elements are supported by the University.
- 1.2 The Council support, at paragraph 9.2.7 of the emerging Local Plan, the continued need for development (which would include academic and other uses) at the University of Reading's Whiteknights and London Road campuses, where such development would not result in significant adverse effects. This is also supported by the University.
- 1.3 With reference to the Council's comments on the potential undesirable effects of student populations within an area as described within paragraph 9.2.7, it is important to note the distinction between the potential impacts from students occupying Houses of Multiple Occupation ("HMO") with those which may arise from new purpose-built student accommodation.
- 1.4 The growing student population in Reading (further detail on this growth is provided in response to Issue 7) coupled with an insufficient supply of purpose-built student accommodation has driven up demand for HMO accommodation. An illustration of the link between the lack of available purpose-built student accommodation and the number of students living in HMOs is provided within the University of Reading Accommodation Strategy 2018-2028, ("URAS"), attached within the Appendix to the University's hearing statement to Issue 7. On page 41 of that document it is demonstrated that the only two years between 2010/11 and 2016/17 where the number of students living in HMO accommodation dropped were two years when large university student accommodation

blocks were opened; in 2012 Childs Hall (594 beds) was opened, and in 2014/15 Bridges Hall (649 beds) was opened.

- 1.5 The demand for HMO student accommodation is rising as student demand increases with 4,875 (URAS, p41) students living in HMOs in 2016/17. This broadly matches the number of students (5,000) who required purpose-built student accommodation but were unable to secure it in 2017/18 (the difference between the numbers explained by a proportion of unofficial HMOs). The number of students unable to secure a student bed in purpose-built student accommodation is projected to rise to 6,875 by 2020/21¹.
- 1.6 Therefore, accommodation of students in HMOs is not only an inefficient method of accommodating the growing student population in comparison to purpose-built student accommodation, it is also not possible to provide the same level of pastoral care, or management to deal with potential undesirable effects on neighbouring permanent community residents which may arise from noise and parking disruption. By comparison, purpose-built student accommodation would be carefully managed by Student Management Plans (e.g. including parking restrictions) and can efficiently accommodate a large number of students when compared to HMO accommodation. The resultant effect would be the returning of a number of predominantly affordable HMO properties (as these tend to be targeted by students) to the open market to cater for general housing needs.
- 1.7 Whilst greater detail on student accommodation need is presented within the University's response to Issue 7, the above commentary, with reference to the evidence contained within the URAS, illustrates that it should be part of the Council's strategy for East Reading to help deal with any perceived present issues with student's accommodating HMOs. This can be done by supporting effectively managed purpose-built student accommodation in not only established campus locations as referred to within paragraph 9.2.7 of the emerging Local Plan, but also in other locations which allow sustainable student access to the further / higher accommodation campuses such as the University of Reading's Whiteknights and London Road Campuses.
- 1.8 Given the development requirements of the University of Reading over the Plan period is an integral part of the East Reading strategy, particularly the availability of quality, affordable student accommodation, the same discussion and evidence raised in response to Issue 7 is relevant to the Council's East Reading strategy.

¹ Based on the Council's methodology for converting student bed spaces to residential unit numbers (that four student bedrooms would free up one dwelling), as set out within the Reading Housing and Economic Land Availability Assessment (November 2017), Volume 1: Main Report (Document EV014 of the Evidence Documents) at paragraph 7.3, this would equate to c.465 dwellings being taken by HMO use if purpose built student accommodation is not available.

- 1.9 Finally, the University's two draft allocations in East Reading, ER1e (St Patrick's Hall) and ER1c (land rear of 8-26 Redlands Road) are not raised as questions under Issue 14 but are raised within Issue 3 (five year supply of housing), Question 3a. The University has therefore responded to the Inspector's question concerning the potential capacity of ER1c and ER1e in response to Issue 3, Question 3a.

Site Allocations – East Reading

- 2.0 **Q2. Is the site allocation of ER1h justified and consistent with other policies within the LP?**

2.1 No comment.

- 3.0 **Q3. Are the requirements for Policies ER2 justified, and will it be effective in terms of delivering student accommodation at the site?**

3.1 The University supports the inclusion of Policy ER2.

3.2 However, there is a need for Policy ER2 to be consistent with other policies of the emerging Local Plan. In particular, as Policies ER2, OU1 and Policy H12 contain text relevant to the supply of student housing, there is a need for consistency across all three policies.

3.3 There would be the need to amend the first sentence of the second paragraph of Policy ER2 to align with the University's recommended amendments to Policy OU1. These are reflected below:

"Where development would result in the need for additional students to be housed in Reading, it should be supported by ~~an~~ corresponding appropriate increase in existing or planned student accommodation."

3.4 The University has previously stated, in line with comments provided in relation to Policy H12 (as addressed within Issue 7, Question 10) that the second sentence of the second paragraph of Policy ER2 should be amended as referred below:

"Provision of new student accommodation on the Whiteknights Campus, ~~or~~ as a reconfiguration or extension of nearby dedicated accommodation, or in other sustainable locations with convenient access via walking, cycling or public transport modes, to services, facilities and places of study, will therefore be acceptable subject to other policies in the Plan."

- 3.5 The Council has responded that no change is proposed to Policy ER2, repeating the same reasoning for not making amendments (as suggested by the University), in relation to Policy H12. The abovementioned amendment to Policy ER2, as mentioned in previous representations, would enable the Policy to be truly effective in supporting the delivery of student accommodation on Whiteknights Campus, but would also cover the University's London Road campus and other potential sustainable locations where compliant with other policies of the plan.
- 3.6 The contents of the policy are otherwise generally supportive of student accommodation on the Whiteknights Campus whilst recognising the constraints facing any proposed development. In order to understand the true capacity of the University's land on campus (and adjacent land) to accommodate development, including student accommodation, the University has prepared a Campus Capacity Study (August 2018). The findings of this study are referenced in the University's response to Issue 7 (Question 10) and included within the Appendix to that statement.
- 3.7 The University would however like to pick up a point raised within previous representations. Former representations, made on behalf of the University, informed the Council that there are errors on the emerging Local Plan Proposals Map where areas of land have been categorised as "areas of biodiversity and green network importance" (due to being covered by areas of deciduous woodland). The University informed the Council that some of the areas proposed to be categorised as areas of biodiversity and green network importance were out-of-date, making particular reference to a small area of land to the direct north east of the Mackinder Halls development. With reference to the below images taken from the Council's Proposals Map for the emerging Local Plan and aerial photography, an area to the immediate north east of the Mackinder Halls development clearly does not contain any deciduous woodland and should therefore be removed from the aforementioned proposed categorisation.

Emerging Local Plan Proposals Map (left) and aerial imagery (right):



3.8 The University also maintains concern that further areas of land a little farther to the east of Mackinder Halls are proposed to be categorised as an “area of identified biodiversity interest” despite not previously being categorised as such within the Sites and Detailed Policies Document (adopted in 2012; revised 2015). This additional area of land (as seen through comparison of the below two images), proposed to be categorised as an “area of identified biodiversity interest”, has been proposed for such categorisation by the Council without evidence supporting the change. In light of this, the Council’s proposed changes to the Proposals Map which seek to categorise additional areas of land as an “area of identified biodiversity interest” would not be justified and would therefore conflict with the requirements of the NPPF at paragraph 182.

Emerging Local Plan Proposals Map (left) and Sites and Detailed Policies Document Proposals Map (right);



3.9 In response to the University's representations made in response to the Council's Regulation 19 consultation on the Proposed Submission Version of the Local Plan, the Council have stated that following review, it appears that all of the mentioned areas are covered in deciduous trees and as such qualify as BAP habitat. The University disagrees with the Council's assessment as discussed above.

4.0 Q4. Are the requirements for Policy ER3 justified and will the Policy be effective?

4.1 No comment.