



**TOWN AND COUNTRY PLANNING ACT 1990
APPEAL UNDER SECTION 78**

**APPEAL BY BERKELEY HOMES (OXFORD & CHILTERN) LTD AGAINST THE DECISION
BY READING BOROUGH COUNCIL TO REFUSE PLANNING PERMISSION FOR
Demolition of existing structures and erection of a series of buildings ranging in height
from 1 to 11 storeys, including residential dwellings (C3 use class) and retail floorspace
(A3 use class), together with a new north-south pedestrian link, connecting Christchurch**

Bridge to Vastern Road

AT

55 Vastern Road, Reading, RG1 8BU

INSPECTORATE REFERENCE: APP/E0345/W/21/3276463

READING BOROUGH COUNCIL REFERENCE: 200188/FUL

REBUTTAL PROOF OF EVIDENCE

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ON BEHALF OF READING BOROUGH COUNCIL

Date: October 2021

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Qualifications, Experience and Declaration

This Proof Rebuttal has been prepared by Mark Worringham. I am Planning Policy Team Leader at Reading Borough Council. I have 20 years' experience in planning policy matters, and have worked in planning policy in Reading since 2004. I hold a Masters Degree in City and Regional Planning from Cardiff University. I am a Member of the Royal Town Planning Institute.

I led production of the Reading Borough Local Plan, adopted in 2019. I also lead preparation of the Council's Annual Monitoring Report which includes the annual updates to the Council's Housing Trajectory and Five-year Housing Land Supply position. I am familiar with the appeal proposal, having prepared the planning policy response to the application.

The evidence which I have prepared and provide for this appeal (reference APP/E0345/W/21/3276463) in this Proof of Evidence is true and has been prepared in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions.

1.0 INTRODUCTION AND SCOPE

- 1.1 This rebuttal proof of evidence sets out rebuttal evidence in response to the 'Town Planning Proof of Evidence' of Kim Cohen relating solely to Section 3.0 on housing land supply. It also sets out rebuttal evidence in response to paragraph 3.4 of the 'Design Proof of Evidence' of Dave Taylor and paragraph 3.7 of the 'Townscape and Visual Proof of Evidence' by Patrick Clark.
- 1.2 At the outset, it is also clarified that this is not expected to be an exhaustive rebuttal and this document only deals with certain points where it is considered appropriate and helpful in responding in writing at this stage. Where a specific point has not been specifically responded to, this does not mean that these points are accepted, and these other points may be addressed further at the Public Inquiry.

2.0 RESPONSES TO THE APPELLANT'S TOWN PLANNING PROOF OF EVIDENCE

2.0.1 The Town Planning Proof of Evidence (PoE) prepared by Mrs Cohen on behalf of the Appellant covers a number of matters relating to housing land supply in section 3.0. Comments within the section refer to both five year housing land supply matters and to the Housing Trajectory covering the whole Local Plan period. However, the Appellant has now confirmed that it is not pursuing a case that RBC does not currently have a five year supply of housing, and this is set out in a Second Addendum SoCG, as submitted on 15th October 2021. This Rebuttal therefore deals mainly with housing land supply in terms of the whole plan period and the Housing Trajectory

2.0.2 The points raised by Mrs Cohen fall into three categories, which I will take in turn:

- Relevance of the standard methodology to housing requirements
- Assumptions about small site windfalls
- Site-specific supply

2.1 Relevance of the standard methodology to housing requirements

2.1.1 Mrs Cohen asserts in paragraph 3.7 of the Town Planning PoE that the revised standard methodology for calculating local housing need is of *“significant relevance to this appeal”* and in paragraph 3.9 that the increasing housing requirement *“supports the case for the appeal proposal to be approved”*. I do not agree for the reasons set out below.

2.1.2 As previously stated, Reading’s housing requirement of 689 homes per annum between 2013 and 2036 was set out in the Local Plan adopted on 4th November 2019, and was based on an objectively assessed housing need of 699 homes per annum. The standard methodology for assessing local housing need would, according to the Council’s calculations, result in an annual local housing need of 872 dwellings starting in 2021, representing a considerable increase over both previously assessed need and housing requirements. The outcome of applying the methodology based on 2021 figures is common ground (see the Second Addendum SoCG, as submitted on 15th October 2021, paragraph 2.2).

2.1.3 It should firstly be noted that it is also common ground that *“the increased requirement is not currently in effect in Reading, and would not be in force until it was reflected in an adopted Local Plan update or until November 2024, whichever is earlier”* (paragraph 7.7 of the Statement of Common Ground).

2.1.4 I do not agree with Mrs Cohen that the standard methodology for calculating housing need is of *“significant relevance to this appeal”* or *“supports the case for the appeal proposal to be approved”*. This is for three main reasons:

- It does not reflect the content of the NPPF and Planning Practice Guidance;
- Figures generated by the standard methodology are almost certain to have changed by the time the Local Plan review takes place; and
- It would pre-empt the outcome of both the Local Plan review and any subsequent plan-making process.

2.1.5 It is my strong view that assessing housing supply against the standard methodology figures in Reading at this point would not be in line with either the NPPF or Planning Practice Guidance.

2.1.6 Paragraph 74 of the NPPF states that:

“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than 5 years old”.

2.1.7 Therefore, local housing need is only used as the basis for assessment where the strategic policies are more than 5 years old. Use of the present tense is relevant here - the question is whether policies “are” more than 5 years old, not whether policies “will be” more than 5 years old. As the Reading Borough Local Plan is less than 5 years old, local housing need is not used as the basis for assessing supply for any of the affected years.

2.1.8 Planning Practice Guidance includes a clear statement on this matter:

“Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where:

- the plan was adopted in the last 5 years, or*
- the strategic housing policies have been reviewed within the last 5 years and found not to need updating.*

In other circumstances the 5 year housing land supply will be measured against the area’s local housing need calculated using the standard method.”

(Paragraph: 005 Reference ID: 68-005-20190722)

2.1.9 According to this guidance, the use of the standard methodology is only of relevance in “other circumstances”. These other circumstances do not currently arise in Reading because the relevant strategic policies are in a plan adopted in the last 5 years.

2.1.10 Neither the NPPF nor the PPG state that, where a local plan review is due to take place within the five year housing supply period (which should virtually always be the case given the statutory five year review timescales) then the standard methodology should be used for those years that fall beyond the review date, which is Mrs Cohen’s contention. If this interpretation were to be

valid, there would need to be a clear statement to this effect in the PPG, because it is not the obvious interpretation of the guidance at all. No such statement is present.

2.1.11 Using the standard methodology figures at this stage is also inappropriate because the figures are virtually certain to have changed (in either direction) by the time that the review takes place and any resulting revisions to the plan are progressed. The methodology places a large emphasis on the affordability adjustment, calculated on the basis of median workplace-based affordability ratios, published annually by the Office for National Statistics. If a Local Plan review were to take place during 2024, the latest possible within the statutory review period, then there would have been three further publications of annual affordability ratios before the calculation of the standard methodology for plan making purposes is required. In this context, it is worth noting that, whilst the longer-term trend is generally for the affordability ratio to increase in Reading, there have also been a number of year on year decreases (2008-09, 2010-11, 2016-17 and 2019-20), so it cannot be said with any certainty what the figures will be when the required plan review takes place.

2.1.12 In addition, there can be no certainty about what the methodology will be at the time the Local Plan in Reading is reviewed. The standard methodology was first introduced in 2018, and since that time it has been subject to two significant changes (once to refer to 2014-based household projections and once to include the uplift for the largest urban areas). The results of the 2021 Census are likely to begin to become available within the intervening period, and may impact on whether 2014-based household projections that will be ten years old by the time of the Local Plan review still have any relevance. The Planning White Paper also suggested that a new methodology be introduced that takes account of constraints and results in a binding housing requirement, although planning reform associated with the White Paper has now been paused. There is considerable uncertainty, and it cannot be assumed for these purposes that the methodology will remain consistent.

2.1.13 Furthermore, use of the standard methodology figures as a basis for assessing future supply at this stage pre-empts the outcome of both the Local Plan review and any subsequent plan-making process.

2.1.14 Firstly, this is because use of the standard methodology is not a mandatory basis for plan-making. Paragraph 61 of the NPPF states that:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”

2.1.15 Therefore, whilst use of the standard methodology would be the default position, national policy allows for alternative approaches to local housing need to be used in exceptional circumstances. Whether this is something that would be pursued in Reading is not known at this point, and this decision would need to be part of the Local Plan review process.

2.1.16 Secondly, once local housing need is identified, there is an additional stage before housing requirements in a plan are set. Paragraph 66 of the NPPF states that:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.”

2.1.17 Therefore, the job of setting strategic policies includes assessing the degree to which the need for the plan area and any unmet needs from neighbouring areas can be accommodated over the plan period. This is the same process which meant that an identified need of 699 homes per annum for Reading Borough resulted in a housing requirement of 689 homes per annum in policy H1 of the Local Plan. A full assessment of capacity to accommodate needs is essential to this process. This may or may not result in a housing requirement that differs from local housing need, or to other approaches such as phased requirements.

This will need to be part of the plan review and subsequent plan-making process, and cannot be assumed at this stage.

2.1.18 On a more specific point, it is also worth noting that Mrs Cohen's PoE, in Table 1, applies a 5% buffer to every year of housing supply across the plan period. The purpose of the buffer, according to the NPPF in paragraph 74, is to bring forward delivery from later in the plan period. Paragraph 74 states that "*The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of ...*". Therefore, it should not be applied across the entire plan period, only to the years falling within five year supply.

2.1.19 Regarding the specific matter of five year housing land supply, Mrs Cohen's PoE, in paragraph 3.8 in particular, suggests that the standard methodology should be factored into five year housing land supply. It is recognised that it is now common ground that Reading has a five year supply of housing land. However, I have nonetheless sought views from other urban authorities that are in a similar position to Reading in that they are among the authorities to which the 35% urban uplift applies, and have adopted Local Plans containing housing requirement figures that are less than five years old. The authorities (other than London Boroughs) in the most comparable position to Reading are Plymouth (Plymouth and South West Devon Joint Local Plan adopted March 2019), Leeds (Core Strategy Selective Review adopted September 2019), Coventry (Local Plan adopted December 2017) and Hull (Local Plan adopted November 2017).

2.1.20 Responses received from each of Plymouth City Council (Appendix 1), Coventry City Council (Appendix 2), Leeds City Council (Appendix 3) and Hull City Council (Appendix 4) agree with RBC's position that, in line with Planning Practice Guidance, the housing requirement figures in adopted Local Plans should continue to be used for the purposes of calculating five-year housing land supply until such time as the plan is reviewed or the five-year review period has passed. I am therefore confident that, as well as fulfilling national policy,

the Council's approach is consistent with other authorities in a similar position across England.

2.2 Assumptions about small site windfalls

- 2.2.1 Mrs Cohen's PoE argues in paragraph 3.13 that RBC's anticipated housing supply is overly optimistic because an unrealistic supply from small site windfalls has been assumed, and that the allowance of 127 per year should be reduced to 117 based on delivery over the plan period up to 2020. I disagree with that conclusion.
- 2.2.2 Before considering the figures in more detail, it is worth mentioning that the figures for small site windfalls reported for past years in the Housing Trajectory published in the 2019-20 Annual Monitoring Report appear to be incorrect for the first three years of the plan period, 2013-2016. They do not accord with the published small site housing completion figures within the annual published Residential Commitments documents. Appendix 5A to 5C contain the relevant tables (Table 5 showing completed dwellings) from the Residential Commitments documents for each year. These figures were included in the Trajectory for information only and do not have any knock-on impacts on any other figures. This error does not affect the basis for calculating the 127 homes per year on small site windfalls, which stems from the Housing and Economic Land Availability Assessment 2017, which uses the correct figures. It also does not affect the overall past completion figures which are correctly reported in the Trajectory and which are used to calculate cumulative completions. Therefore, whilst an unfortunate error on behalf of RBC, correction of this error will not affect any other entries within the Housing Trajectory.
- 2.2.3 The correct figures are set out in Table 1 below. It should be noted that use of the correct figures only subtly affects the specific comment made by Mrs Cohen in paragraph 3.13, in that the allowance of 127 per year is still only exceeded in 2014-15 and 2017-18, although using the correct figures it is also equalled in 2015-16. However, it does affect the overall conclusion, because the average of delivery over that seven-year period 2013-2020 was actually 126 rather than 117 per year.

Table 1: Corrections to small site windfall figures in 2019-20 Housing Trajectory

Year	Small site completions (incorrect figures as reported in 2019-20 Housing Trajectory)	Small site completions (correct figures as reported in annual Commitments documents)
2013-2014	123	114
2014-2015	129	155
2015-2016	80	127
2016-2017	103	103
2017-2018	141	141
2018-2019	124	124
2019-2020	117	117
Total 2013-2020	817	881
Annual average 2013-20	117	126

2.2.4 However, corrections aside, I disagree with the wider point that it is only past delivery within the plan period that should be taken into account. The plan period has so far included some years of low delivery of homes due the end of the recession period, which affected housebuilding in Reading until at least 2014, and the effects of the pandemic. The small site windfall allowance of 127 per year was calculated within the Housing and Economic Land Availability Assessment (HELAA, published November 2017), which made up part of the Local Plan evidence base. These assumptions were available to the Inspector for the Local Plan as part of both the Housing Trajectory and calculations of five year supply, and, in her final report she considered the Housing Trajectory to be “realistic” (paragraph 27) and that “*The Council’s assumptions on demonstrating a five-year supply of housing land are robust*” (paragraph 28). The Inspector’s Report is included as Appendix 3 of Mr Markwell’s Proof of Evidence.

2.2.5 The approach taken by the HELAA is to calculate average past delivery of housing on small sites over a 15-year period between 2002 and 2017. This longer period smooths the effects of particular economic cycles. In accordance with the NPPF at the time (paragraph 48 in the 2012 NPPF), development on

garden land was excluded from the previous figures, although this is no longer specifically referred to in the 2021 NPPF. Given that this methodology was considered to form an appropriate basis for plan-making when the plan was examined, it makes sense to retain the approach and update the figures.

2.2.6 If the same calculation as considered appropriate through the Local Plan examination process was updated for the 15-year period from 2006 to 2021, the results would be as set out in Table 2. As can be seen, there would be a small reduction in annual figures from 127 to 124 per year. Spread over the remaining 15 years of the plan period, this would mean a total reduction of 45 dwellings.

Table 2: Small site windfalls 2006-2021

Year	Small site windfalls (all)	Small site windfalls (excluding garden land)
2006-2007	157	114
2007-2008	177	147
2008-2009	203	160
2009-2010	193	170
2010-2011	134	122
2011-2012	117	113
2012-2013	134	128
2013-2014	114	106
2014-2015	155	139
2015-2016	127	118
2016-2017	103	97
2017-2018	141	136
2018-2019	124	103
2019-2020	120	112
2020-2021	107	99
Average 2006-2021	140.4	124.3

2.2.7 However, it is worth being aware that the small site windfall calculations relate to dwellings only, which for the purpose of the commitments monitoring are C3 dwellinghouses and C4 small houses in multiple occupation. It does not include

other forms of accommodation such as residential care, student accommodation and large HMOs, which are otherwise accounted for in the figures for strategic sites in the trajectory. No allowance is made in the trajectory for these to continue to come forward on small sites, although the reality is that accounting for these would likely increase the small site windfall figures, for instance because losses of dwellinghouses to sui generis HMOs on small sites, a fairly common form of development in Reading, would be eliminated from the calculations.

2.2.8 For the plan period so far, the figures for small site completions (excluding garden land) would be amended as set out in Table 3 if all forms of residential accommodation were included. Details of the schemes that have resulted in these changes can be seen in Appendix 6, as can the methodology set out in the Local Plan for translating bedspaces in other forms of accommodation into a dwelling equivalent. As can be seen from Table 3, accounting for other forms of accommodation results in an average of an additional 4 homes per year.

Table 3: Small site windfalls 2013-2021 including all forms of residential accommodation

Year	Small site windfalls (excluding garden land) (C3/C4)	Small site windfalls (other forms of accommodation)	Small site windfalls (excluding garden land) (all forms)
2013-2014	106	-4	102
2014-2015	139	-1	138
2015-2016	118	1	119
2016-2017	97	7	104
2017-2018	136	1	137
2018-2019	103	6	109
2019-2020	112	15	127
2020-2021	99	9	108
Total 2013-21	910	34	944
Annual average 2013-2021	114	4.25	118

2.2.9 Therefore, given that in reality residential accommodation delivered through non-C3 forms of accommodation is likely to further boost the small site windfall figures from 124 per year (using updated figures within the established methodology) to 128 per year, I contend that the annual small site windfall assumption of 127 dwellings per year remains generally robust.

2.3 Site-specific supply

2.3.1 Mrs Cohen's PoE makes further assertions regarding the site-specific supply included within the Council's calculation of both its Housing Trajectory and its Five Year Housing Land Supply. These points relate to three sites:

- Land at Madejski Stadium, Shooters Way
- Alexander House, Kings Road
- Broad Street Mall.

Accounting for change and uncertainty

2.3.2 Before examining individual sites, it is worth bearing in mind that some degree of uncertainty and change from year to year is an inevitable aspect of calculating housing land supply in Reading. The circumstances surrounding sites that are, due to the nature of Reading, often in an existing use or where there are other competing uses such as commercial or community uses, mean that assumptions on sites may have to change significantly. This works both ways, in that it can reduce housing supply on some sites whilst increasing it on others. It is worth bearing in mind that this is the reason that the Council applies lapse rates to all sites where construction has not started - generally 10% on sites with planning permission or resolution to grant permission and 20% on prior approvals or local plan allocations (unless there are specific sites with greater certainty). The Trajectory therefore already accounts for uncertainty.

Land at Madejski Stadium, Shooters Way

2.3.3 The comments made by Mrs Cohen about Land at Madejski Stadium appear to relate only to timing, in terms of whether it can be relied on for the purposes of five year supply, not to the likelihood of implementation in the plan period to 2036. As it is now common ground that Reading has a five-year housing land supply, it is not considered that this needs to be addressed further.

Alexander House, Kings Road

2.3.4 Regarding Alexander House, Kings Road, the points made by Mrs Cohen are valid. The planning permission for the 56 dwellings on the site has now expired without the development being implemented. Prior approval for conversion to 22 dwellings was granted in June 2021. After accounting for lapse rates (see Appendix 7 for full details), this would result in 32 fewer dwellings being delivered over the plan period. The updated Housing Trajectory and Five Year Housing Land Supply for the 2020-21 Annual Monitoring Report will take account of this change.

Broad Street Mall

2.3.5 Regarding Broad Street Mall, it remains the case at the time of writing that the Section 106 agreement on this site has not yet been signed. However, the applicant and Council have made good progress in recent weeks on progressing this application. Conditions are now agreed and an extension of time has been agreed until 27th October, with both parties anticipating signature by that date. Permission may well have been issued before the inquiry takes place.

2.3.6 As Mrs Cohen identifies, the site has now been put up for sale. The Council does not agree that this means that the site is not deliverable. “Deliverable” sites are identified in the NPPF Glossary as including “*all sites with detailed planning permission*” until permission expires, “*unless there is clear evidence that homes will not be delivered within five years*”. I contend that the fact that a site has been put up for sale does not constitute clear evidence that homes will not be delivered within five years, and would not do so until such time as there was some evidence around the intentions of a new owner.

2.3.7 In any case, as the issue is not around demonstration of a five year supply and is instead around delivery across the longer plan period, the Broad Street Mall could still be included in supply calculations in the Trajectory if it were considered a “*developable*” site in line with the NPPF Glossary, albeit that its delivery outside the five year period would need to be assumed. Developable means that “*sites should be in a suitable location for housing development*”

with a reasonable prospect that they will be available and could be viably developed at the point envisaged". As the Council has resolved to grant permission for this residential development, the site is clearly in a suitable location for housing. Viability was assessed through the planning application process, and this demonstrated that the development was viable with an affordable housing contribution of 9%. Finally, even if a site is put up for sale, until the intentions of a new landowner are known it cannot be claimed that there is no reasonable prospect of its availability for housing development.

Other site-specific supply matters

2.3.8 As previously stated, uncertainty and change works both ways. A significant number of sites of 10 or more dwellings not included within the 2019-20 Housing Trajectory have since been granted planning permission or prior approval, or have a resolution to grant permission by the end of September 2021. These are as follows:

- 43 London Street (191043) - development of 21 dwellings granted June 2020;
- 42 Portman Road (200693) - prior approval for 16 dwellings granted August 2020;
- Wensley Road (200122) - development of 46 dwellings granted December 2020;
- 45 Caversham Road (201420) - development of 40 dwellings granted March 2021 (part of existing Local Plan allocation CR12b resulting in uplift of 10 dwellings over total assumed for this part of the site in 2019-20 Trajectory);
- 1 Bennet Court, Bennet Road (210306, 210320) - two separate prior approvals for 49 dwellings total granted April 2021;
- Arthur Hill Pool, 221-225 Kings Road (201135) - development of 15 dwellings granted May 2021 (existing Local Plan allocation ER1h for which 8 dwellings assumed in 2019-20 Trajectory);
- Great Brighams Mead, Vastern Road (210567) - prior approval for 110 dwellings granted June 2021;
- Land at 362 Oxford Road (201391) - development of 26 dwellings granted June 2021 (existing Local Plan allocation WR3j for which 13 dwellings assumed in 2019-20 Trajectory);

- Plot E, Station Hill (201537) - development of 415 dwellings representing an uplift of 45 dwellings over previously assessed supply, granted July 2021;
- Plot F, Station Hill (201533) - development of 184 dwellings representing an uplift of 16 dwellings over previously assessed supply, granted July 2021;
- Station Hill North (192032) - phases including new dwellings are in outline only, and would result in up to 750 additional dwellings above previously calculated supply, but likely balance of residential and non-residential is extremely flexible and number of homes that will actually be delivered is uncertain at this stage - granted July 2021;
- Rose Kiln Court, Rose Kiln Lane (211138) - prior approval for 38 dwellings granted September 2021;
- Fountain House, Queens Walk (211177) - prior approval for 48 dwellings granted September 2021;
- Soane House, 6-8 Market Place (211261) - prior approval for 93 dwellings granted September 2021;
- 2 Kings Road (211263) - prior approval for 12 dwellings granted October 2021;
- 11-12 Market Place (211312) - prior approval for 14 dwellings granted October 2021;
- 115 Chatham Street (210349) - development of 54 dwellings, resolved to grant permission July 2021, awaiting Section 106 (part of existing Local Plan allocation CR12b resulting in uplift of 34 dwellings over total assumed for this part of the site in 2019-20 Trajectory); and
- The Meadway Precinct, Honey End Lane (191496) - outline application for redevelopment of precinct for retail premises and 258 dwellings, resolved to grant permission October 2021, awaiting Section 106. 27 existing dwellings on site, meaning net gain of 231.

2.3.9 In total, the additional homes from the sites above, after inclusion of lapse rates and accounting for any dwellings already counted on a site within the Trajectory due to its inclusion as a Local Plan allocation, is 699, excluding Station Hill North where the number of homes is uncertain.

2.3.10 Furthermore, there would be an increase in the number of homes available to the land supply from major sites already within the Trajectory as a result of development commencing and the lapse rates therefore moving to zero. Based on the sites under construction at the end of 2020-21, this would mean:

- Land between Weldale Street and Chatham Street (170326) - 422 homes total, 42 additional homes in supply as a result of lapse rate changing from 10% to 0%;
- Former Cox and Wyman, Cardiff Road (171814) - 96 homes total of which 92 homes outstanding, 6 additional homes in supply as a result of lapse rate changing from 10% to 0%;
- Dukesbridge House, 23 Duke Street (201043) - 76 homes (prior approval), 14 additional homes in supply as a result of lapse rate changing from 20% to 0%, taking account of reduction in size of scheme by 1 dwelling;
- Dukesbridge Chambers, 1 Duke Street (191221) - 25 dwellings (prior approval), 5 additional homes in supply as a result of lapse rate changing from 20% to 0%;
- Norcot Community Centre, Lyndhurst Road (181377) - 18 dwellings, 2 additional homes in supply as a result of lapse rates changing from 10% to 0%; and
- 199-207 Henley Road (190835) - care home calculated as equivalent to 41 dwellings, 4 additional homes in supply as a result of lapse rate changing from 10% to 0%.

2.3.11 In total, this elimination of lapse rates for sites newly under construction adds 73 dwellings to the supply. It is worth noting that further sites have commenced development since the last monitoring exercise in April 2021. In particular, plots E and F of Station Hill have now commenced, and, as these total 538 dwellings (not including the uplift referred to in paragraph 2.41 above) and a lapse rate of 10% was assumed for the 19-20 Trajectory, this adds a further 54 dwellings to the supply. This may also apply to some other sites, but a full monitoring exercise has not been carried out since April 2021.

2.3.12 In addition to Alexander House, there are a number of other developments included in the 2019-20 Housing Trajectory where permission has recently expired. Whilst it is entirely possible that new proposals will be submitted on these sites, for the purposes of this analysis, they can be removed from the supply:

- Warwick House, 1 Warwick Road (151407) - development for 10 dwellings
- City Wall House, 26 West Street (171257) - change of use to 10 dwellings
- 14 Arkwright Road (180654) - prior approval for 37 dwellings
- 33 Blagrove Street (181074) - prior approval for 28 dwellings

2.3.13 In addition, the development at the former Reading Family Centre has reduced from 47 dwellings to 41 as a result of the latest permission. In total, these reductions to supply (taking account of relevant lapse rates and including Alexander House) total 107 dwellings.

Summary of site-specific supply

2.3.14 Therefore, as a result of new permissions, resolutions to grant permission and changes to lapse rates as a result of developments commencing, the total net additional homes added to supply for the plan period after accounting for lapse rates would be 719 (without accounting for Station Hill North). This includes the reduced supply for Alexander House, which Mrs Cohen has raised, but does not include any amendments for Land at the Madejski Stadium or Broad Street Mall for the reasons set out in paragraph 2.3.3 and paragraphs 2.3.5 - 2.3.7 respectively. This is set out in full in Appendix 7.

2.4 Conclusion

- 2.4.1 In paragraph 6.4 of Mr Markwell's Statement of Case, he notes that, based on the 2019-20 Housing Trajectory, the Council is expecting to exceed Local Plan housing requirements over the whole plan period to 2036 by 556 dwellings, and that this would give sufficient headroom to accommodate the identified total shortfall in meeting housing need over the plan period of 230 dwellings. Mr Markwell also identifies in paragraph 6.6 of the Statement of Case that this also means that the appeal site does not need to be developed for 209 dwellings to meet plan requirements.
- 2.4.2 Mrs Cohen's PoE (paragraph 3.21) argues that the exceedance of plan targets is likely to be lower than set out by Mr Markwell, and identifies reduced supply from small site windfalls and from three specific sites (Land at Madejski Stadium, Alexander House and Broad Street Mall) as reasons why this would be the case. Although Mrs Cohen's PoE does not include a specific figure by which assessed housing supply should be reduced, I have calculated the total reduction to supply that would be made across the whole plan period if the points in her Planning PoE were to be accepted as 562 dwellings after accounting for lapse rates (150 dwelling from small site windfalls, 32 dwellings at Alexander House, 380 dwellings at Broad Street Mall and no dwellings at Land at Madejski Stadium as the arguments are around timings only). Mrs Cohen further argues that increased housing requirements due to the changes to the methodology for local housing need will result in supply falling short of the requirement.
- 2.4.3 In this Rebuttal, I have demonstrated that the assumptions in the Housing Trajectory around small site windfalls remain robust and that no reduction should be assumed. I have also demonstrated that, since the date of the 2019-20 Housing Trajectory, changes to site-specific supply would result in supply over the plan period increasing by a further 719 dwellings. This takes account of a reduction for Alexander House as highlighted by Mrs Cohen, but not for Land at Madejski Stadium or Broad Street Mall for the reasons set out in this Rebuttal. This means that Mr Markwell's conclusions in paragraphs 6.4-6.6 of

his Statement of Case remain valid, and that, contrary to Mrs Cohen's conclusions, the exceedance of plan targets is likely to be higher than set out by Mr Markwell, at 1,275 dwellings over plan requirements over the plan period. This continues to give headroom to accommodate the shortfall from the Local Plan (230 dwellings) and a reduction in the dwellings on the appeal site (identified by Mrs Cohen in paragraph 3.24 of her PoE as being as high as 91 dwellings). It would also give headroom to allow for the additional reductions claimed by Mrs Cohen for small site windfalls (150 dwellings over the plan period) and Broad Street Mall (380 dwellings over the plan period accounting for lapse rates) whilst still resulting in an exceedance of plan requirements.

2.4.4 I have also made the case that housing supply in Reading should be judged against plan requirements in policy H1 of the adopted Local Plan rather than against the standard methodology for local housing need in the PPG, which, it is common ground, is not currently in effect in Reading. Use of the standard methodology at this stage would not reflect the PPG or NPPF, would not take account of changes in the methodology and/or assumptions and would pre-empt the Local Plan review and any subsequent plan-making process.

3.0 RESPONSES TO THE APPELLANT'S DESIGN PROOF OF EVIDENCE

- 3.1 The Design Proof of Evidence (PoE) prepared by Mr Taylor on behalf of the Appellant refers in paragraph 3.4 to the intentions of those who drafted policy CR11 of the Local Plan and the planning policy response to the planning application that is the subject of this appeal. Whilst the Rebuttal by Mr Doyle deals in depth with the matters covered in Mr Taylor's PoE, it is necessary to deal with this specific matter in this Rebuttal since I drafted both policy CR11 and the planning policy response.
- 3.2 In paragraph 3.4 of Mr Taylor's PoE he argues that the wording in paragraph 5.4.6 of the Local Plan ("*If visual links are provided, this will help change the perception of the area north of the station as a separate entity*") perhaps accepts that unbroken views from the station to the river would not be possible to achieve. Paragraph 3.4 argues that because the Reading Station Area Framework (RSAF) pre-dates the Local Plan by 9 years, the Local Plan may have taken account of changes in that period, hence the wording above. The only changes likely to have influenced whether an unbroken view can be achieved is the subdivision of the CR11g site and retention of the SSE equipment.
- 3.3 I can confirm that Mr Taylor's speculation on the drafting of 5.4.6 is incorrect. The wording in question in paragraph 5.4.6 of the Local Plan in fact pre-dates both the submission of this planning application and the production of the RSAF. The wording is taken from the paragraph 6.11 of the supporting text to the equivalent policy RC1 in the Reading Central Area Action Plan (RCAAP), adopted in January 2009, which I also drafted. An extract from the RCAAP is included as Appendix 8. At the time, there was no reason to suppose that the site would be subdivided, the SSE equipment retained or that there would be any other impediment to clear visual links.
- 3.4 This was also the case at the time that the Local Plan was drafted. The Local Plan was submitted in March 2018, with the wording above identical to the adopted version. The first point at which development proposals on the basis of

a divided site were known to the Council was in October 2018, as part of the initial pre-application by Barton Willmore on behalf of Berkeley Homes (Western) Limited. By this point, the Local Plan was at the public hearings stage of the Examination. The potential subdivision of the site had not been raised in the SSE Regulation 19 representations of January 2018, and was not therefore discussed in the Examination.

- 3.5 Mr Taylor further speculates in paragraph 3.4 that the wording of the planning policy response was informed by the supposed intentions behind the drafting of paragraph 5.4.6. I can confirm that this was not the case, because paragraph 5.4.6 was not drafted with any such intentions.
- 3.6 Mr Doyle's Rebuttal Proof of Evidence deals with this matter further in paragraphs 3.2.3 to 3.2.7.

4.0 RESPONSES TO THE APPELLANT'S TOWNSCAPE AND VISUAL PROOF OF EVIDENCE

4.1 The Townscape and Visual Proof of Evidence (PoE) prepared by Mr Clark on behalf of the Appellant refers in paragraph 3.7 to the intentions behind those who drafted policy CR11 of the Local Plan. Whilst the Rebuttal by Mr Doyle deals in depth with the matters covered in Mr Clark's PoE, it is necessary once again to deal with this specific matter in this Rebuttal.

4.2 Mr Clark suggests that the practical challenges of providing visual links may have been recognised between the production of the RSAF and Local Plan, hence the wording of paragraph 5.4.6 (*"If visual links are provided, this will help change the perception of the area north of the station as a separate entity"*). This is a similar point to Mr Taylor's Design PoE which I addressed in section 3.0. As I have demonstrated in response to Mr Taylor, this was not the case as this wording pre-dates both the RSAF and the submission of the planning application that is the subject of this appeal.

Appendix 1: Response from Plymouth City Council

From: [Jackson, Grant](#)
To: [Worringham, Mark](#)
Subject: FW: Five year land supply - approach to urban uplift
Date: 04 October 2021 11:18:13

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Hi Mark,

Happy to discuss if you want to give me a call, I am available all day today and between 9am and 3pm tomorrow. In short I totally agree with your interpretation/position which is consistent with our view. Think your appellant is being rather mischievous and misinterpreting the framework and guidance. More than happy to talk through the arguments/rebuttal if helpful?

Kind regards

Grant

Grant Jackson BA(Hons), M.Plan, MRTPI

Planning Officer (Joint Local Plan Team)

Strategic Planning and Infrastructure

Plymouth City Council

Ballard House

West Hoe Road

Plymouth

PL1 3BJ

T +441752305474

E grant.jackson@plymouth.gov.uk

www.plymouth.gov.uk

From: Planning Policy <planningpolicy@plymouth.gov.uk>

Sent: 01 October 2021 15:30

To: Jackson, Grant <Grant.Jackson@plymouth.gov.uk>

Subject: FW: Five year land supply - approach to urban uplift

OFFICIAL

Hi Grant

This is an email in relation to 5 year land supply calculations, can you respond?

Kind regards

Jonathan Helmn

Planning Officer

Strategic Planning and Infrastructure

Plymouth City Council
Ballard House
West Hoe Road
Plymouth
PL1 3BJ

T +441752306831

E jonathan.helmn@plymouth.gov.uk
www.plymouth.gov.uk

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

Sent: 01 October 2021 15:21

To: Planning Policy <planningpolicy@plymouth.gov.uk>

Subject: Five year land supply - approach to urban uplift

OFFICIAL

Dear Planning Policy

I am Planning Policy Team Leader at Reading Borough Council, and I have a query regarding your calculation of five-year housing land supply. It seems that Plymouth is in a very similar position to Reading in that your Local Plan was adopted in 2019 and you are also one of the 20 urban areas to which the 35% uplift in the standard methodology for housing need applies.

We are at appeal on a site at the moment, and the appellant's proofs of evidence are suggesting that, because November 2024 is five years from adoption of our Local Plan, when calculating five year supply, for part of 2024-25 and all of 2025-26, we should be applying our much higher standard methodology figure rather than our adopted Local Plan targets. This is not how I had been interpreting Planning Practice Guidance – I was just assuming that our Local Plan targets would apply across all of the 5 year supply until such time as the statutory review period was up or we reviewed our policies.

Is this something you have given any thought to, and, if so, what is your approach please?

Regards

Mark

Mark Worringham
Planning Policy Team Leader
Planning Section | Directorate of Economic Growth and Neighbourhood Services

Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Mobile: 07855 126084

Email: mark.worringham@reading.gov.uk

Please note that I am currently working at home until further notice. Please contact me by e-mail or on my mobile number, as my RBC landline number will not be answered.

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Appendix 2: Response from Coventry City Council

From: [Planning Policy](#)
To: [Worringham, Mark](#)
Subject: RE: Five year housing land supply - approach to urban uplift
Date: 05 October 2021 10:10:29
Attachments: [0.png](#)

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Hi Mark

We've had a look and yes, we would agree with Reading's interpretation of the guidance

Kind regards

Clare Eggington

Principal Town Planner (Planning Policy)
Coventry City Council
One Friargate
Coventry
CV1 2GN

Phone: 02476 972751

www.coventry.gov.uk

From: Worringham, Mark <Mark.Worringham@reading.gov.uk>
Sent: 01 October 2021 16:14
To: Planning Policy <Planningpolicy@coventry.gov.uk>
Subject: Five year housing land supply - approach to urban uplift

OFFICIAL

Dear Planning Policy Team

I am Planning Policy Team Leader at Reading Borough Council, and I have a query regarding your calculation of five-year housing land supply. It seems that Coventry is in a very similar position to Reading in that your Local Plan is adopted and less than 5 years old, and you are also one of the 20 urban areas to which the 35% uplift in the standard methodology for housing need applies. We are slightly behind you in that our Local Plan was adopted in 2019.

We are at appeal on a site at the moment, and the appellant's proofs of evidence are suggesting that, because November 2024 is five years from adoption of our Local Plan, when calculating five year supply, for part of 2024-25 and all of 2025-26, we should be applying our much higher standard methodology figure rather than our adopted Local Plan targets. This is not how I had been interpreting Planning Practice Guidance – I was just assuming that our Local Plan targets would apply across all of the 5 year supply until such time as the statutory review period was up or we reviewed our policies.

Is this something you have given any thought to, and, if so, what is your approach please?

Regards

Mark

Mark Worringham
Planning Policy Team Leader
Planning Section | Directorate of Economic Growth and Neighbourhood Services

Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Mobile: 07855 126084

Email: mark.worringham@reading.gov.uk

Please note that I am currently working at home until further notice. Please contact me by e-mail or on my mobile number, as my RBC landline number will not be answered.

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Appendix 3: Response from Leeds City Council

From: [Brook, Matthew](#)
To: [Worringham, Mark](#)
Subject: RE: Five year land supply - approach to urban uplift
Date: 05 October 2021 16:52:11
Attachments: [image002.png](#)

OFFICIAL

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Hi Mark,

Thank you for your email, which has just been forwarded to me.

My interpretation is that same as yours – and, I'd advance, the only one in line with PPG. The requirement figure for 5YHLS is the adopted Core Strategy (September 2019) and would be in use until it is either replaced as part of a local plan update with a new requirement or upon the adopted target becoming 5 years old in 2024 and no longer in use.

I'd say 'Paragraph: 005 Reference ID: 68-005-20190722' is unequivocal that *"Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where: the plan was adopted in the last 5 years"*.

I can understand why your appeal proof would recognise what the impact of the 35% uplift would be and you could (for illustrative purposes) calculate a 5YHLS position with the uplift applied in years 2024/25 and 2025/26. However, there is no requirement for you to do so as the 35% uplift is for consideration and inclusion as part of plan-making rather than decision-taking activities.

I hope that helps.

Many thanks.

Matthew Brook | Principal Planner
Policy and Plans Group | Data & Intelligence Team
City Development | Merrion House | 9th Floor East
Tel: 0113 37 87650 | Email: matthew.brook@leeds.gov.uk



From: Local Plan Leeds <localplan@leeds.gov.uk>
Sent: 05 October 2021 16:30
To: Brook, Matthew <Matthew.Brook@leeds.gov.uk>
Subject: FW: Five year land supply - approach to urban uplift

From: Worringham, Mark <Mark.Worringham@reading.gov.uk>
Sent: 01 October 2021 15:41
To: Leeds Local Plan Update <lp@Leeds.gov.uk>
Subject: Five year land supply - approach to urban uplift

OFFICIAL

FAO Planning Policy – apologies if this has come through to the wrong team, please redirect as appropriate

I am Planning Policy Team Leader at Reading Borough Council, and I have a query regarding your calculation of five-year housing land supply. It seems that Leeds is in a very similar position to Reading in that your Core Strategy amendments were adopted in 2019 and you are also one of the 20 urban areas to which the 35% uplift in the standard methodology for housing need applies.

We are at appeal on a site at the moment, and the appellant's proofs of evidence are suggesting that, because November 2024 is five years from adoption of our Local Plan, when calculating five year supply, for part of 2024-25 and all of 2025-26, we should be applying our much higher standard methodology figure rather than our adopted Local Plan targets. This is not how I had been interpreting Planning Practice Guidance – I was just assuming that our Local Plan targets would apply across all of the 5 year supply until such time as the statutory review period was up or we reviewed our policies.

Is this something you have given any thought to, and, if so, what is your approach please?

Regards

Mark

Mark Worringham

Planning Policy Team Leader

Planning Section | Directorate of Economic Growth and Neighbourhood Services

Reading Borough Council

Civic Offices

Bridge Street

Reading

RG1 2LU

Mobile: 07855 126084

Email: mark.worringham@reading.gov.uk

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Appendix 4: Response from Hull City Council

From: [Cumberlin Chris](#)
To: [Worringham, Mark](#)
Cc: [Gray Roger](#); [Harrison Robert](#)
Subject: RE: Five year land supply - approach to urban uplift
Date: 05 October 2021 17:04:45

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Mark,

We would agree with your reading of Planning Practice Guidance and that use of your adopted Local Plan housing figure is the correct approach.

Background figures for Hull are:

- Local Plan 2016 to 2032 – Adopted November 2017. Housing Requirement 9,920 (620 PA x 16 years);
- Net delivery for first 5 years 4,024, a residual requirement 5,896 (11 Years) **536 per annum;**
- The 35% ‘Cities’ uplift in the standard methodology is applicable but by coincidence for 2021 it raises our minimum housing need figure to **536 per annum.**

So for Hull, use of the (residual) housing requirement of our plan period (the minimum housing need) wouldn't be seen as something for dispute in a local appeal situation, particularly since any plan review will potentially lead to a lower housing requirement than in the adopted LP.

Plus currently we have:

- Housing Delivery Test figures of 165% (2018), 194% (2019) and 241% for 2020;
- A 5-year supply of 5.9 years in our SHLAA 2021.

Hope this is helpful.

Regards,

Chris Cumberlin
Economic Development & Regeneration
Hull City Council
Floor 2, The Guildhall
Alfred Gelder Street
Kingston upon Hull
HU1 2AA
Tel: 01482 612386
Email: chris.cumberlin@hullcc.gov.uk
Web: www.hull.gov.uk

From: Gray Roger
Sent: 05 October 2021 10:48

To: Harrison Robert <Robert.Harrison@hullcc.gov.uk>; Cumberlin Chris <Chris.Cumberlin@hullcc.gov.uk>
Subject: FW: Five year land supply - approach to urban uplift

An interesting query from Reading Borough Council re interpretation of guidance and five year land supply. It was forwarded to me – could one of you respond please. Might be useful to get some insight to what they are doing etc.

Thanks

Roger

From: Development Control <Dev.Control@hullcc.gov.uk>
Sent: 05 October 2021 10:27
To: Gray Roger <Roger.Gray@hullcc.gov.uk>
Subject: FW: Five year land supply - approach to urban uplift

From: Worringham, Mark <Mark.Worringham@reading.gov.uk>
Sent: 01 October 2021 15:57
To: Development Control <Dev.Control@hullcc.gov.uk>
Subject: FW: Five year land supply - approach to urban uplift

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Please could you pass to the Planning Policy team, as I can't find alternative contact details?

Thanks

Mark Worringham

From: Worringham, Mark
Sent: 01 October 2021 15:53
To: 'planning.policy@hullcc.gov.uk' <planning.policy@hullcc.gov.uk>
Subject: Five year land supply - approach to urban uplift

Dear Planning Policy Team

I am Planning Policy Team Leader at Reading Borough Council, and I have a query regarding your calculation of five-year housing land supply. It seems that Hull in a very similar position to Reading in that your Local Plan is adopted and less than 5 years old, and you are also one of the 20 urban areas to which the 35% uplift in the standard methodology for housing need applies. We are slightly behind you in that our Local Plan was adopted in 2019.

We are at appeal on a site at the moment, and the appellant's proofs of evidence are suggesting

that, because November 2024 is five years from adoption of our Local Plan, when calculating five year supply, for part of 2024-25 and all of 2025-26, we should be applying our much higher standard methodology figure rather than our adopted Local Plan targets. This is not how I had been interpreting Planning Practice Guidance – I was just assuming that our Local Plan targets would apply across all of the 5 year supply until such time as the statutory review period was up or we reviewed our policies.

Is this something you have given any thought to, and, if so, what is your approach please?

Regards

Mark

Mark Worringham
Planning Policy Team Leader
Planning Section | Directorate of Economic Growth and Neighbourhood Services

Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Mobile: 07855 126084

Email: mark.worringham@reading.gov.uk

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Appendix 5: Data on completed dwellings on small sites from Residential Commitments documents 2013-2020

Appendix 5A: Completed dwellings 2013-2014

READING BOROUGH COUNCIL - RESIDENTIAL COMMITMENTS 2014

Table 5 - Planning Permissions (Hard Commitments) Completed 2013-2014

	New Build	Demolition	Conversion Gain	Conversion Loss	Change of Use Gain	Change of Use Loss	Net Change
Reading Borough Total	381	92	46	23	51	2	361
By Ward							
Abbey	31	0	8	3	19	2	53
Battle	0	0	8	4	1	0	5
Caversham	0	0	7	3	3	0	7
Church	21	0	0	0	0	0	21
Katesgrove	82	0	4	2	21	0	105
Kentwood	2	0	2	1	0	0	3
Mapledurham	3	0	0	0	0	0	3
Minster	2	0	0	0	0	0	2
Norcot	145	87	2	1	0	0	59
Park	6	1	2	1	1	0	7
Peppard	8	0	2	1	0	0	9
Redlands	0	0	7	2	6	0	11
Southcote	1	1	0	0	0	0	0
Thames	1	1	0	0	0	0	0
Tilehurst	50	0	4	5	0	0	49
Whitley	29	2	0	0	0	0	27
By Development Plan Designation							
Central Reading	34	0	4	2	29	2	63
Smaller Centres	6	0	6	3	5	0	14
Town Centres Sub-Total	40	0	10	5	34	2	77
South Reading Total	114	2	2	1	2	0	115
Core Employment Areas Total	0	0	0	0	0	0	0
By Type							
Brownfield	373	92	42	22	51	2	350
Greenfield	8	0	4	1	0	0	11
By Size							
Large	224	87	0	0	0	0	137
Medium	101	0	0	0	9	0	110
Small	56	5	46	23	42	2	114

APPENDIX 5b: Completed dwellings 2014-2015

READING BOROUGH COUNCIL - RESIDENTIAL COMMITMENTS 2015

Table 5 - Planning Permissions (Hard Commitments) Completed 2014-2015

	New Build	Demolition	Conversion Gain	Conversion Loss	Change of Use Gain	Change of Use Loss	Net Change
Reading Borough Total	353	3	47	25	266	3	635
By Ward							
Abbey	15	0	17	8	152	0	176
Battle	34	0	14	6	5	0	47
Caversham	0	0	3	1	1	0	3
Church	0	0	0	0	0	0	0
Katesgrove	44	0	4	3	26	1	70
Kentwood	11	0	2	1	2	1	13
Mapledurham	2	1	0	0	0	0	1
Minster	51	1	2	1	16	0	67
Norcot	37	0	0	0	3	0	40
Park	3	0	0	3	3	1	2
Peppard	16	0	0	0	0	0	16
Redlands	4	0	1	0	49	0	54
Southcote	39	0	0	0	0	0	39
Thames	4	0	2	1	0	0	5
Tilehurst	10	1	0	0	9	0	18
Whitley	83	0	2	1	0	0	84
By Development Plan Designation							
Central Reading	15	0	11	7	150	0	169
Smaller Centres	0	0	2	1	21	0	22
Town Centres Sub-Total	15	0	13	8	171	0	191
South Reading Total	124	0	3	1	2	0	128
Core Employment Areas Total	0	0	0	0	0	0	0
By Type							
Brownfield	337	3	47	25	266	3	619
Greenfield	16	0	0	0	0	0	16
By Size							
Large	216	0	0	0	10	0	226
Medium	77	0	0	0	177	0	254
Small	60	3	47	25	79	3	155

Appendix 5C: Completed dwellings 2015-2016

READING BOROUGH COUNCIL - RESIDENTIAL COMMITMENTS 2016

Table 5 - Planning Permissions (Hard Commitments) Completed 2015-2016

	New Build	Demolition	Conversion Gain	Conversion Loss	Change of Use Gain	Change of Use Loss	Net Change
Reading Borough Total	508	69	47	17	301	19	751
By Ward							
Abbey	226	0	27	8	70	18	297
Battle	5	0	11	5	11	1	21
Caversham	14	0	2	1	0	0	15
Church	1	0	0	0	2	0	3
Katesgrove	0	0	2	1	173	0	174
Kentwood	10	0	0	0	0	0	10
Mapledurham	0	3	0	0	0	0	-3
Minster	29	0	0	0	0	0	29
Norcot	91	61	1	0	1	0	32
Park	4	4	2	1	0	0	1
Peppard	0	0	0	0	0	0	0
Redlands	0	0	0	0	24	0	24
Southcote	2	0	0	0	0	0	2
Thames	2	0	0	0	0	0	2
Tilehurst	8	0	2	1	20	0	29
Whitley	116	1	0	0	0	0	115
By Development Plan Designation							
Central Reading	226	0	12	4	233	17	450
Smaller Centres	12	0	9	3	4	0	22
Town Centres Sub-Total	238	0	21	7	237	17	472
South Reading Total	117	1	0	0	0	0	116
Core Employment Areas Total	0	0	0	0	0	0	0
By Type							
Brownfield	499	69	47	17	301	19	742
Greenfield	9	0	0	0	0	0	9
By Size							
Large	263	61	0	0	0	0	202
Medium	223	0	0	0	216	17	422
Small	22	8	47	17	85	2	127

Appendix 6: Adjustments to small site windfalls to account for non-C3/C4 forms of residential

Year completed	Application reference	Address	Description	Bedspace gained	Dwelling equivalent gained	Bedspace lost	Dwelling equivalent lost	Net change in dwelling equivalent ¹
2013-14	120777	4 Granville Road	Demolish supported housing facility and replacement with nine apartments.	0	0	12 ²	6	-6
2013-14	130156	2 Western Elms Avenue	Side extensions and change of use from offices to two large HMOs.	14	2	0	0	+2
2013-14 Total	N/A	N/A	N/A	14	2	12	6	-4
2014-15	121733	27 Hamilton Road	Change of use of residential care to a 12 room bedsit HMO (Sui Generis)	12	3	15	8	-5
2014-15	130747	23-25 Whitley Street	Change of use of part ground floor, first and second floors to 10 bedroom HMO	10	1	0	0	+1
2014-15	140098	Arch Guest House, 92 Basingstoke Road	Proposed change of use from guest house to large house in multiple occupation with single storey rear extension	8	1	0	0	+1
2014-15	140266	18 Bulmershe Road	COU of ground floor of the property from two independent flats to add an additional five persons, to the existing small C4 HMO at first and second floor levels, to create a large Sui Generis HMO for 11 persons.	11	1	0	0	+1

¹ NB: Net change in the number of C3/C4 dwellinghouses is already taken into account within the figures. This column shows the net change from non-C3/C4 forms of accommodation only

² This has been estimated based on floorspace of similar supported housing facilities as no data was provided on existing bedspaces in the planning application

Year completed	Application reference	Address	Description	Bedspaces gained	Dwelling equivalent gained	Bedspaces lost	Dwelling equivalent lost	Net change in dwelling equivalent ¹
2014-15	141549	189 Southampton Street	Certificate of Lawfulness Existing Use relating to a house in multiple occupation, 7 bedsits.	7	1	0	0	+1
2014-15 Total	N/A	N/A	N/A	48	7	15	8	-1
2015-16	141054	48 Watlington Street	Proposed conversion of 48 Watlington Street from HMO into 4 no. self contained flats.	0	0	7	1	-1
2015-16	141799	89 Whiteknights Road	Change of use of an existing licensed small HMO to a children's care home.	6	1	0	0	+1
2015-16	150309	221 Oxford Road	Change of use to 8-bedroom HMO (sui generis).	8	1	0	0	+1
2015-16	150447	178 Caversham Road	Change of use from C3 residential dwelling to 7-bed HMO, rear extensions	7	1	0	0	+1
2015-16	151013	149 London Road	Certificate of Lawfulness for existing use as 10 self contained flats at first and second floor level.	0	0	10	1	-1
2015-16 Total	N/A	N/A	N/A	21	3	17	2	+1
2016-17	140369	Jasmine House Nursing Home, 16-22 Westcote Road	Two single storey extensions to the rear of the property to provide for 6 additional resident bedrooms	6	3	0	0	+3
2016-17	150042	1 Lacewood Gardens	Change of use from C3 dwellinghouse to Sui Generis large HMO for ten persons with single storey side and rear extensions.	10	1	0	0	+1
2016-17	150592	217 Kentwood Hill	Change of use from single dwelling to a large HMO (sui generis).	6	1	0	0	+1

Year completed	Application reference	Address	Description	Bedspaces gained	Dwelling equivalent gained	Bedspaces lost	Dwelling equivalent lost	Net change in dwelling equivalent ¹
2016-17	152256	58 Prospect Street, Caversham	Change of use from 6 bedroom HMO to 7 bedroom HMO	7	1	0	0	+1
2016-17	152298	46 Watlington Street	Conversion of HMO to 4 flats, rear extension and new chimney stacks (part- retrospective).	0	0	6	1	-1
2016-17	161477	29 Church Road, Earley	Retrospective change of use from dwellinghouse to 1 bed self-contained basement flat and change of use from dwellinghouse at ground, first and second floors to seven person large HMO.	7	2	0	0	+2
2016-17 Total	N/A	N/A	N/A	36	8	6	1	+7
2017-18	151171	29 Newcastle Road	Change of use to a 9 bedroom HMO with part single storey and part two storey side and rear extensions	9	1	0	0	+1
2017-18	152171	13 and 15 Craven Road	Change of use of existing building to form 2 no. 8 bedroom HMOs (sui generis).	16	2	0	0	+2
2017-18	160419	46 Queens Road	Alterations to convert into a residential HMO providing 9 no units with shared communal facilities	9	2	0	0	+2
2017-18	160765	172 Southampton Street	Change of use from C2 (Residential Institution) to Sui-Generis HMO	7	1	5	1	0
2017-18	161420	Helena House, Brownlow Road	Change of use from Sui Generis HMO to a mixed use comprising 4 x C1 serviced apartments and 9 x C3 residential flats, including partial demolition of existing building	0	0	28	7	-7

Year completed	Application reference	Address	Description	Bedspaces gained	Dwelling equivalent gained	Bedspaces lost	Dwelling equivalent lost	Net change in dwelling equivalent ¹
2017-18	170710	126 Caversham Road	Change of use from a 6-bed HMO, C4 Use Class to a 7-bed HMO.	7	1	0	0	+1
2017-18	171677	1 Upper Redlands Road	Change of Use from small HMO to a large Sui Generis HMO comprising 8 bedrooms and one studio room	9	2	0	0	+2
2017-18 Total	N/A	N/A	N/A	57	9	33	8	+1
2018-19	152075	993 Oxford Road	COU from residential home for adults with severe learning difficulties into 6 flats.	0	0	6	3	-3
2018-19	160361	154 Southampton Street	Single-storey rear extension and change of use of a large sui generis HMO to five self-contained studio flats and two self-contained one-bedroom apartments.	0	0	7	1	-1
2018-19	170577	226 Wokingham Road	Change of use from physiotherapy clinic to Sui Generis HMO to include a single storey rear extension, car parking, bin and cycle storage.	9	1	0	0	+1
2018-19	171728	9 Craven Road	Change of use from dwelling house to 7 bedroom HMO	7	1	0	0	+1
2018-19	182020	25 Broomfield Road, Tilehurst	Retrospective planning permission for the change of use of a 6-bedroom HMO to a 7-bedroom HMO for a maximum of 7 occupants	7	1	0	0	+1
2018-19	182088	40 Anglefield Road, Caversham	Retrospective planning permission for the change of use of a 6-bedroom HMO to a 7-bedroom HMO for a maximum of 7 occupants.	7	1	0	0	+1

Year completed	Application reference	Address	Description	Bedspaces gained	Dwelling equivalent gained	Bedspaces lost	Dwelling equivalent lost	Net change in dwelling equivalent ¹
2018-19	181885	26 Worcester Close	Retrospective change of use of a 6-bedroom C4 class HMO into a 7-bedroom Sui Generis HMO for a maximum of 7 occupants	7	1	0	0	+1
2018-19	182094	30a Gratwicke Road, Tilehurst	Retrospective planning permission for the change of use of a 6-bedroom HMO to a 7-bedroom HMO for a maximum of 7 professionals.	7	1	0	0	+1
2018-19	181879	3c Bulmershe Road	Certificate of lawfulness of existing use as a 7 bedroom Sui Generis large HMO	7	1	0	0	+1
2018-19	181248	240 Wokingham Road	Part retrospective change of use from C3 (residential dwellinghouse) to Sui Generis (as a 'larger HMO')	10	1	0	0	+1
2018-19	180407	11 Denmark Road	Change of use from 5 bedroom C4 HMO to a 7 bedroom sui generis HMO	7	1	0	0	+1
2018-19	181250	142 Tilehurst Road	Change of use from use class C3 (b) (housing for people with learning disabilities) to use class C2 (assisted residential)	5	1	0	0	+1
2018-19 Total	N/A	N/A	N/A	73	10	13	4	+6
2019-20	160753	Land at Hillside, Allcroft Road	Construction of an eight bedroom student housing unit as an extension to student housing block C.	8	1	0	0	+1

Year completed	Application reference	Address	Description	Bedspaces gained	Dwelling equivalent gained	Bedspaces lost	Dwelling equivalent lost	Net change in dwelling equivalent ¹
2019-20	170625	Land at Hillside, Allcroft Road	Construction of a seven bedroom student housing unit, a Laundry and a Common Room as an extension to student housing block D.	7	1	0	0	+1
2019-20	180108	Connaught House, 116 Connaught Road	Change of use application to convert existing residential property containing 4.no 1 bed flats, into an 8 bed shared house for adults with learning difficulties (C2)	8	4	0	0	+4
2019-20	182052	38 Alexandra Road	Retrospective change of use from C3 dwelling house to 6 Bed C2 Assisted living use, with communal areas. With an onsite manager in a flat on the second floor and new part two storey and part single storey side extensions to create additional 3 x C2 rooms.	8	4	0	0	+4
2019-20	181728	14 Boston Avenue	Retrospective change of use from C3 residential dwellinghouse to an 8 bedroom sui generis HMO	8	1	0	0	+1
2019-20	190979	157 Northcourt Avenue	Retrospective application for the conversion of C4 HMO to a Sui-generis HMO for up to 7-persons.	7	1	0	0	+1
2019-20	190724	276 Kings Road	Internal alterations and retrospective change of use from small HMO (C4) to a large HMO (Sui Generis) comprising seven bedrooms	7	1	0	0	+1
2019-20	181515	9 West Hill	Proposed change of use from a C3 dwellinghouse to a 7 person large Sui Generis HMO	7	1	0	0	+1

Year completed	Application reference	Address	Description	Bedspaces gained	Dwelling equivalent gained	Bedspaces lost	Dwelling equivalent lost	Net change in dwelling equivalent ¹
2019-20	191178	105 Northumberland Avenue	Conversion of dwellinghouse (use class C3) to 7 person HMO (use class Sui Generis)	7	1	0	0	+1
2019-20	190786	172 Caversham Road	Proposed conversion from C1 (Guest House) to Sui Generis HMO and minor building alterations.	7	1	0	0	+1
2019-20	190942	7 Christchurch Gardens	Certificate of lawfulness for the existing use as a 7 person HMO (Sui Generis)	7	1	0	0	+1
2019-20	190600	1015 Oxford Road	Retrospective planning permission for change of use to large HMO	7	1	0	0	+1
2019-20	172207	8 Shinfield Road	Demolition of the existing dwelling and the construction of a new detached dwelling to be used as a large sui generis HMO for a maximum of 14 persons.	10	1	0	0	+1
2019-20	170671	8 Bath Road	Part retrospective change of use from C3 dwelling to 7 bedroom large Sui Generis HMO, and single storey rear extension to accommodate 3 bedrooms to create a 10 bedroom, maximum 15 person HMO.	10	2	12	6	-4
2019-20 Total	N/A	N/A	N/A	108	21	12	6	+15
2020-21	180788	42 Shinfield Road	Demolition of the existing dwelling and the construction of a new detached dwelling to be used as a large sui generis HMO for a maximum of 14 persons.	14	2	0	0	+2

Year completed	Application reference	Address	Description	Bedspaces gained	Dwelling equivalent gained	Bedspaces lost	Dwelling equivalent lost	Net change in dwelling equivalent ¹
2020-21	191703	35 London Road	Conversion from a C2A (secure residential institution) to a 6 bed, 6 person HMO (C4 use) with internal alterations	0	0	6	3	-3
2020-21	181372	66 Watlington Street	Conversion of an existing basement flat and 5 bedsit rooms to 4 x 1-bed residential flats and erection of a part-one, part-two storey rear extension	0	0	5	1	-1
2020-21	200797	2 Connaught Close	COU from two dwellings to a children's assisted living care home (C2)	7	4	0	0	+4
2020-21	200944	14 Norris Road	Certificate of Lawfulness for existing use as sui generis HMO for 7 persons	7	1	0	0	+1
2020-21	190498	40 Erleigh Road	Conversion of C4 HMO to a Sui-generis HMO (change from 6 bedrooms to 7 bedrooms)	7	1	0	0	+1
2020-21	200361	11 Upper Redlands Road	Certificate of Lawfulness for the existing use of the property as a 9 person Sui Generis HMO	9	1	0	0	+1
2020-21	200360	9 Upper Redlands Road	Certificate of Lawfulness for the existing use of the property as a 8 person / 8 bedroom Sui Generis HMO	8	1	0	0	+1
2020-21	200362	12 Christchurch Road	Certificate of Lawfulness for the existing use of the property as a 10 person/10 bedroom Sui Generis HMO	10	1	0	0	+1
2020-21	201152	11 Addington Road	Certificate of Lawfulness for existing use of 11 Addington Road as a 10 bedroom/ 10 person HMO (Sui Generis)	10	1	0	0	+1

Year completed	Application reference	Address	Description	Bedspaces gained	Dwelling equivalent gained	Bedspaces lost	Dwelling equivalent lost	Net change in dwelling equivalent ¹
2020-21	200363	50 Cressingham Road	Certificate of Lawfulness for the existing use of the property as a 9 person / 9 bedroom Sui Generis HMO	9	1	0	0	+1
2020-21 Total	N/A	N/A	N/A	81	13	11	4	+9

NB: Local Plan Appendix 1 paragraph A1.3 sets the basis for converting other forms of accommodation into a dwellings equivalent:

“The way that the different types of accommodation are converted into dwelling equivalents in the Housing Trajectory is set out below:

- *Student accommodation: There is potential for new student accommodation to free up existing housing. Where there is a cluster of bedrooms with shared kitchen and living room facilities, this is considered to be equivalent to a single dwelling, as are studios which are entirely self-contained. More frequently, accommodation is in the form of study bedrooms with some shared facilities, and in these cases we assume that four bedrooms equates to one dwelling.*
- *Houses in multiple occupation: The approach to HMOs is largely similar to that for student accommodation. Small C4 HMOs are already counted as ‘dwellings’ in the Council’s monitoring in any case. For larger ‘sui generis’ HMOs, it is considered that, where it is a cluster of bedrooms in a dwelling style with shared kitchen and living facilities, it is equivalent to a single dwelling. Where it comprises bedsits with shared toilet facilities, it is assumed that four bedsits equates to one dwelling.*

- *Residential care and other accommodation for older people: Some accommodation for older people, such as extra care housing, tends to count as a C3 dwelling anyway, where it is a wholly self-contained residential unit. In care accommodation with shared facilities, the assumption is that two new residential care spaces free up one new home.*
- *Serviced apartments (where authorised) are considered to fall within the C1 hotel use class and will not be counted against housing supply.”*

Appendix 7: Summary of changes to strategic sites (10 dwellings or more) between 1st April 2020 and 30th September 2021

Application ref	Site	Total dwellings assumed in 2019-20 HT	Lapse rate assumed in 2019-20 HT	Total dwellings assumed in 2019-20 HT (with lapse rates)	Dwellings permitted/ resolved to grant at end September 2021	Applicable lapse rate ³	Dwellings available for supply end September 2021 (with lapse rates)	Net change from 2019-20 HT
151407	Warwick House, 1 Warwick Road	10	10%	9	-	-	-	-9
162057, 210536	Alexander House, 205-207 Kings Road	56	10%	50	22	20%	18	-32
170251	City Wall House, 26 West Street	10	10%	9	-	-	-	-9
170326	Land between Weldale Street and Chatham Street	422	10%	380	422	0%	422	+42
171814	Former Cox and Wyman, Cardiff Road	96	10%	86	92 ⁴	0%	92	+6
180654	14 Arkwright Road	37	20%	30	-	-	-	-30
181074	33 Blagrove Street	28	20%	22	-	-	-	-22
181377	Norcot Community Centre, Lyndhurst Road	18	10%	16	18	0%	16	+2
181652, 191659	Former Reading Family Centre, North Street	47	10%	42	41	10%	37	-5
190465, 201537	Plot E, Station Hill	370	10%	333	415	0%	415	+82
190466, 201533	Plot F, Station Hill	168	10%	149	184	0%	184	+35
190602, 201043	Dukesbridge House, 23 Duke Street	77	20%	62	76	0%	76	+14
190835	199-207 Henley Road (dwelling equivalent used)	41	10%	37	41	0%	41	+4
191043	43 London Street	-	-	-	21	10%	19	+19

³ Assuming the following – 0% for sites under construction; 10% for sites with planning permission or resolution to grant; 20% for office prior approvals.

⁴ 4 homes already completed on site since 2019-20 Trajectory

Application ref	Site	Total dwellings assumed in 2019-20 HT	Lapse rate assumed in 2019-20 HT	Total dwellings assumed in 2019-20 HT (with lapse rates)	Dwellings permitted/ resolved to grant at end September 2021	Applicable lapse rate ³	Dwellings available for supply end September 2021 (with lapse rates)	Net change from 2019-20 HT
191221	Dukesbridge Chambers, 1 Duke Street	25	20%	20	25	0%	25	+5
192032	Station Hill North	-	-	-	750 (max)	10%	675 (max)	[+675, not included in total due to uncertainty]
200693	42 Portman Road	-	-	-	16	20%	13	+13
200122	Wensley Road	-	-	-	46	10%	41	+41
201135	Arthur Hill Pool, Kings Road	8	10%	7	15	10%	14	+7
201391	Land at 362 Oxford Road	13	20%	10	26	10%	23	+13
201420	45 Caversham Road	30 ⁵	20%	24	40	10%	36	+12
210306, 210320	1 Bennet Court, Bennet Road	-	-	-	49	20%	39	+39
210349	115 Chatham Street (resolution to grant)	20 ⁶	20%	16	54	10%	49	+33
210567	Great Brighams Mead, Vastern Road	-	-	-	110	20%	88	+88
211138	Rose Kiln Lane Court, Rose Kiln Lane	-	-	-	38	20%	30	+30
211177	Fountain House, Queens Walk	-	-	-	48	20%	38	+38
211261	Soane Point, 6-8 Market Place	0	20%	0	93	20%	74	+74
211263	2 Kings Road	-	-	-	12	20%	10	+10

⁵ As part of wider site CR12b

⁶ As part of wider site CR12c

Application ref	Site	Total dwellings assumed in 2019-20 HT	Lapse rate assumed in 2019-20 HT	Total dwellings assumed in 2019-20 HT (with lapse rates)	Dwellings permitted/resolved to grant at end September 2021	Applicable lapse rate ³	Dwellings available for supply end September 2021 (with lapse rates)	Net change from 2019-20 HT
211312	11-12 Market Place	-	-	-	14	20%	11	+11
191416	Meadway Precinct, Honey End Lane (resolution to grant)	-	-	-	231	10%	208	+208
TOTAL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+719

Appendix 8: Extract from the Reading Central Area Action Plan, adopted January 2009

- 6.9** In order for the station area to become a destination in its own right, it should contain a wide mix of uses across the area. This wide mix of uses will ensure that the station area becomes a vibrant central quarter, active at different times of the day. This will mean retail and leisure development, to help draw the station into the core of the centre, new residential development, which will require substantial improvements to the physical environment, and offices. The station area will be the main focus for new office development in the centre, to capitalise on its high accessibility by rail and other public transport. There is also potential for future community uses within the area, including police facilities and infrastructure. A Station Area Development Framework will be prepared for this area, to enable the benefits of the station development to have a knock-on effect on surrounding areas.
- 6.10** In terms of retail and leisure development, the Station/River area will be particularly significant in delivering the needs that have been identified through background research and in this document. A need for a maximum of 100,250 sq m of additional retail floorspace has been identified to 2016¹⁹, and the leisure facilities sought are set out in paragraph 5.15. A large proportion of these uses will need to be provided in the Station/River Major Opportunity Area, both north and south of the station.
- 6.11** The successful development of this area hinges on improved accessibility by public transport, and improved permeability for pedestrians and cyclists. In terms of permeability, improving links for pedestrians and cyclists through the centre, particularly in a north-south direction, is one of the key principles for the RCAAP, along with removing barriers to access within the centre. **If visual links are also provided, this will help change the perception of the area north of the station as a separate entity.** The station/river area can make a particularly significant contribution to implementing
- these principles, since the most significant barriers to movement are in this area, and the opportunity to implement these should be seized. Ensuring active frontages along these routes will assist these to become attractive links, as will the provision of new areas of open space. This is particularly important on the route between the shopping core, the station and the Thames.
- 6.12** The improvements to the station and the need for a new multi-modal interchange are key elements of the Council's transport strategy and Core Strategy, as is some form of mass rapid transit linked to park and ride. These developments are likely to have requirements in terms of land, and it should be ensured that development does not prejudice those improvements which are key to the delivery of Reading's overall transport and spatial strategy, including the vision for the centre. In addition, some new public car parking is likely to be required in the area, which, due to space constraints and changes in levels, may well in some cases take the form of undercroft car parking.
- 6.13** Parts of the area around the station are appropriate for well-designed tall buildings, in line with the Tall Buildings policy (RC13), and the area will be developed at a higher density even where there are no tall buildings. However, schemes in these areas should take account of the fact that there are areas of low-rise housing fringing the area, and this should be reflected in the design of schemes, both in terms of the effect on character of the area and on the amenity of residents. In addition, there are a number of significant listed buildings in or adjoining the Major Opportunity Area, south of the railway tracks, including the historic station building, as well as a conservation area close by. Development should respect the setting of these features and will need to be carefully scaled to avoid detriment to them.

¹⁹ Reading Retail and Leisure Study 2005