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Subject: Reading Borough Council's Draft Local Plan - Scottish and Southern Electricity Ltd Representations
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[170613 SSE Vastern Road - Draft Local Plan Policy Representation Final.pdf](#)
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Dear Sir / Madam

On behalf of our client, Scottish and Southern Electricity Plc (SSE), please see attached representations to the Draft Reading Local Plan.

Please could you confirm by return of this email that you have received SSE's representation?

If you require any further information, please do not hesitate to contact me.

Regards

Nicholas

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13th June 2017

Dear Sir / Madam

Reading Draft Local Plan – Scottish and Southern Electricity Plc Representations

We are writing on behalf of our client, Scottish and Southern Electricity Plc (hereafter SSE), who own 53 – 55 Vastern Road, Reading, RG1 8BU (hereafter ‘the site’).

SSE have a long association with Reading and remain committed to the town through the opening of their new headquarters building at 1 Forbury Place this year. The opening of this new office accommodation and the consolidation of their head office functions in Reading will result in the offices and most of the car parking at the site becoming redundant. The distribution infrastructure on the site will continue to be required as the site provides a significant proportion of the electrical distribution capacity for Reading, with high voltage electricity coming into the site and being stepped down onsite in two phases. Consequently, SSE will not completely vacate the site, but due to their long past and continuing future involvement in the town, would like to leave a positive legacy on the surplus land which contributes to the economic, social and environmental roles of the town.

SSE have reviewed the Council’s development aspirations for the site set down in the Reading Station Area Framework which seeks to create a pedestrian route across the site to link the Christchurch Bridge with the town centre. SSE have responded to this aspiration and have prepared a feasibility study which envisages the redevelopment of the site for a residentially led mixed used development comprising of the demolition of the existing office buildings and construction of a residential, hotel and office development incorporating a new public space adjacent to the river. The two large 132kV/33 kV substations that occupy a central location within the site will need to be retained but can be relocated within the site to enable the creation of the pedestrian route. The four 33kV/11kV substations located along the eastern boundary will need to be retained in their present location where they will not impact on the development proposals. The single 11kV/240V substation in the north-west corner of the site can be moved as part of a redevelopment.

Site and Surrounding Area

The site is located on the northern edge of Reading town centre and lies between the inner ring road and the southern bank of the River Thames. Reading Station Interchange and Vastern Court Retail Park are situated to the south of the site. Christchurch Bridge is situated immediately to the north of the site crossing the River Thames to Christchurch Meadows. The site is surrounded principally by residential premises,

retail outlets and offices, with the River Thames walkway immediately to the north of the site. The site extends to c.1.19ha. It is currently occupied by SSE offices, electrical infrastructure, access roads and car parking. The site currently accommodates 180 parking spaces, including are 5 disabled spaces. The extent of the site is shown on the plan at Appendix 1.

The southern part of the site is occupied by a 2 and 3 storey brick office building fronting Vastern Road with a modern built 2 storey extension at the rear. The centre of the site is occupied by two large 132/111 kV and four 33kV/11kV substations which are fed by an underground oil cooled 132kV cable entering the site subterraneously from Vastern Road in the south-east corner. The substations are also cooled by oil with an individual oil tank above each substation.

A backup generator provides power to the air cooling units for the substations immediately to the north. An above ground steel banded diesel tank is situated adjacent to the generator. The generator and the tank are situated on a concrete slab and surrounded by a gravel cover.

The North West corner of the site is covered with grass and shrubs. A small electrical substation 11 kV / 240 V is situated within the grassed area adjacent to the western boundary of the site. The substation is situated on a concrete base and surrounded by gravel.

The site is generally covered by asphalt/hard surfaces and is primarily used for access or car parking. The site currently benefits from 3 vehicle access points comprising 1 entrance and 2 exits. These are:

- access off Vastern Road via a lockable gate;
- exit onto Vastern Road via a lockable gate; and
- exit onto Lynmouth Road via a lockable gate.

Reading Borough Council (hereafter RBC) recently confirmed in a letter dated 26th May 2017 that the two storey brick building at 55 Vastern Road has been added to the List of Locally Important Buildings and Structures of Local Heritage Significance.

Development Intentions

In response to the development parameters shown in the Reading Station Area Framework, SSE have drawn up a feasibility proposal for the site which includes redevelopment to provide a mixed use scheme for 250 – 300 residential units, a hotel (105 rooms) together with 105 car parking spaces in order to assess viability. The essential transformer apparatus would be retained but in a reconfigured arrangement necessary to release land for development and open up the route for the walkway from the Christchurch Bridge to the town centre.

Car parking would be provided at existing ground floor level which would become the basement in the new scheme, to raise the residential out of the flood risk area. There would be a new pedestrian route created through the centre of the site giving access direct through to Christchurch Bridge, although the existing stair and ramp accesses would be retained to give access from the Thames side path. The two central transformers are relocated to the south and would be screened by the new development and potentially fully enclosed. Housing would be wrapped across the front of these units with potentially office use at ground to provide a vibrant frontage onto the walkway. A public space would be created at the north end of

the site at the grounding point of the bridge.

A similar but lower level housing block would be provided on the west side of the site, set in so as to maintain privacy and daylight / sun light to the residential properties fronting Lynmouth Road.

The bulk of the residential accommodation is provided at the north end of the site where two residential towers are proposed overlooking the Thames and Christchurch Meadows opposite. These are beneath the definition of a tall building but will still create a focal point at this new entrance to the town centre. This location is the most desirable residential position on the site and will generate the highest values which will make the relocation of the central transformers viable. Their relocation is essential to creating the central walkway which opens up the pedestrian/cycle route to the town centre and giving validity to the location of the Christchurch Bridge.

Local Plan Representations

The site is located within the Station / River Major Opportunity Area (Policy CR11) and is specifically identified in sub-area 'Riverside' (Policy CR11g). SSE **supports** the inclusion of the site within a Major Opportunity Area and **supports** the main thrust of Policy CR11 (Station / River Major Opportunity Area).

SSE **supports** the vision of Policy CR11 and in particular '*the station / river area will be a flagship scheme*'. The vision states:

'The station/river area will be a flagship scheme, extending the centre and providing a mixed use destination in itself and centred on the new station and public transport interchange. It will integrate the transport links and areas northwards towards the River Thames and into the heart of the centre.'

Policy CR11 'i' aims that the Station / Riverside area should '*contribute towards providing a high-density mix of uses to create a destination in itself and capitalise on its role as one of the most accessible locations in the south east*' and Policy CR11 'ii' states that the Station / River Major Opportunity Area will '*help facilitate greater pedestrian and cycle permeability, particularly on the key movement corridors. North-south links through the area centred on the new station, including across the IDR, are of particular importance*'. The proposed development of the site offers the only opportunity to meet this policy aim. It would increase the north / south pedestrian and cycle links to the town centre which has been envisaged by RBC positioning Christchurch Bridge across the River Thames.

SSE **agrees** that the station / river area should be a flagship scheme, extending the centre and the improvement of transports links and area northwards towards the River Thames. The site is key to opening up the transport links (pedestrian and cycling) from Christchurch Bridge to the town centre. Without this link the location of the bridge has no validity as it does not provide a direct route into the town centre. It is clear that RBC built the Christchurch Bridge which crosses the River Thames envisaging a link through the site. This can be seen in previous policy documents and is reflected in the Draft Local Plan. This vision for the site was developed without reference to SSE and overlooks the location of the transformers on the site and the need for them to remain. The centrally placed transformers and switch room will prevent the realisation of the vision, in particular the ability to create a pedestrian route across the site focussed on the Christchurch Bridge, unless there is sufficient value in the scheme to secure their viable relocation.

SSE proposal to redevelop the site to achieve RBC's aims for a 'key movement corridor' and 'new area of open space' as indicated on Figure 5.3 (Station / River Major Opportunity Area Strategy). For this to happen, the two 132/111 kV transformers and associated switch room will need to be relocated. Unless, this infrastructure is relocated, it is not possible to achieve the link from the riverside to Vastern Road in the form envisaged in the Draft Local Plan and other policy documents.

The relocation of this the electrical equipment is very costly and will lead to high (several million pounds) abnormal costs. Therefore, the development parameters for the site must be sufficiently flexible to reflect the cost of the relocation in order to ensure proposals are viable.

Policy 11g (Riverside) sets out the main development aims of the site. It states that '*development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from the river*'. SSE **disagrees** that the development should be set back at least ten metres from the River Thames. This would severely restrict the developable area of the site which is already constrained by the electrical equipment and low height housing on at Lynmouth Road. RBC must understand the commercial reality that the riverside is where the value created to enable the site to be redeveloped. SSE propose that the distance from the River Thames to development should be 5 metres. SSE will carefully consider visual / viewing corridors in any proposed development including along the River Thames. The policy goes on to state that '*development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, with potential for an area of open space at the riverside*'. SSE agrees with the need for a high quality green link from the town centre to Christchurch Bridge. SSE proposals include a pedestrian and cycle link with open green space towards the River Thames. SSE **supports** the indicative development potential of 250 – 370 residential dwellings and 1,000 – 2,000 sq m of leisure.

There are a number of supporting policy documents and evidence base which inform the Draft Local Plan and development aspirations in the Station / Riverside area. The Reading Station Area Framework (RSAF) identified this site as falling within the area of potential for medium-high density development with a 'benchmark' heights of 4 storeys (on the west) and 6 storeys (on the east). SSE believes that to deliver RBC's aspirations for this site higher density and landmark buildings must be towards the River Thames to generate value in the site to offset the high abnormal costs of relocating the electrical infrastructure. The Christchurch Bridge is a major gateway to the town centre and can be marked as such.

Policy CR10 (Tall Buildings) relates to the location and height of tall buildings within the Borough. The site falls outside the area identified for tall buildings (defined as 10 storeys of commercial floorspace or 12 storeys of residential) equating to 36 metres above existing ground level. SSE consider that this policy is out of date and not based on a new evidence base which matches RBC's vision and aspiration. By restricting tall buildings to three areas within Reading town centre it restricts further development potential of areas just outside the tall building zones. SSE consider that the site could contain structures which exceed the benchmark heights or the tall building parameters subject to design which would not cause impact on visual / viewing corridors.

Summary and Conclusion

SSE have a long association with Reading and remain committed to the town through the opening of their new headquarters building at 1 Forbury Place later this year. Whilst not completely vacating the Vastern



Road site, the company would like to leave a positive legacy on the surplus land but the location of the electricity distribution infrastructure imposes restrictions on the development options, in particular meeting of the Council's aspirations for a new pedestrian route, and whilst capable of being relocated at a cost, this cost needs to be reflected in the policy proposals for the site.

Therefore, it is vital the RBC provide sufficient flexibility to enable this site to be redevelopment to meet the aspirations of both SSE and RBC. This is a key site situated adjacent to the Thames at one end of Christchurch Bridge and there is now a realistic opportunity to achieve the key movement linkages, open space, housing and leisure benefits envisaged in established local planning policy.

Yours sincerely,

A handwritten signature in blue ink that reads "N. Milner".

Nicholas Milner
Senior Consultant – Development and Planning

Appendix 1 – The Site

