

From: [Steven Roberts](#)
To: [Planning Policy](#)
Cc: [Philip Brown](#)
Subject: Pre-Submission Draft Reading Borough Local Plan 2036 Regulation 19 consultation response
Date: 26 January 2018 16:55:24
Attachments: [18.01.26 PSLP Reg 19 Reprs on behalf of Scottish and Southern Energy \(Policy CR10\).pdf](#)
[18.01.26 PSLP Reg 19 Reprs on behalf of Scottish and Southern Energy \(Policy CR11\).pdf](#)
[26.01.18 Scottish and Southern Energy \(Policy CR11\).pdf](#)
[26.01.18 Scottish and Southern Energy \(Policy CR10\).pdf](#)

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Dear Sirs,

Please find our representations attached, submitted on behalf of Scottish and Southern Energy (SSE), in response to the Council's Pre-Submission Draft Reading Borough Local Plan 2036 Regulation 19 consultation.

I attach the following:

- Full Savills Regulation 19 representations – Response on Behalf of Scottish and Southern Energy dated 26 January 2018 to Pre-Submission Draft Reading Borough Local Plan 2036 Regulation 19 consultation – Policy CR10;
- Full Savills Regulation 19 representations – Response on Behalf of Scottish and Southern Energy dated 26 January 2018 to Pre-Submission Draft Reading Borough Local Plan 2036 Regulation 19 consultation – Policy CR11;
- 2 completed 'Representation Forms' which correspond back to the full representations, including comments on: Policy CR10; Policy CR11.

I would be grateful if you could confirm receipt of this email and attachment.

Please could you keep us informed of any updates or changes to the Local Plan 2036 process.

Should you have any questions or require further information please do not hesitate to contact myself or Phil Brown (contact details enclosed).

Regards

Steven

Steven Roberts
Associate
Planning

Savills, Ground Floor, Hawker House, 5-6 Napier Court, Napier Road, Reading RG1 8BW



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Reading Borough Council - Pre-Submission Draft Local Plan
Under Regulation 19 of the Town and Country Planning (Local Planning)
(England) Regulations 2012

November 2017

Guidance on Making Representations
(Statement of Representations Procedure)

Consultation Details

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Representations should be made in writing, either by e-mail or post. Please e-mail responses to:

planningpolicy@reading.gov.uk

Or send responses to:

Planning Policy
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

We will not be able to accept representations made after Friday 26th January 2018.

Guidance on making representations

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Secondly, the examination will be to find out whether the Local Plan is sound, legally compliant and fulfils the duty to co-operate. Therefore, your

representation will need to address whether you think the Local Plan passes or fails these tests. More details on these tests are below:

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- **Soundness:** In order to be sound, a plan must be:
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 - Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.
- **Duty to co-operate:** This is a legal duty on local authorities to co-operate with other local authorities and a number of other bodies in preparing plans. More detail on the duty to co-operate is available at <https://www.gov.uk/guidance/duty-to-cooperate>

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- The part of the document to which your response relates (paragraph, policy or section);
- Whether you consider that the plan, or part of the plan, is legally compliant, sound and complies with the duty to co-operate, and why;
- What modification you think is necessary to make the plan, or part of the plan, legally compliant and/or sound¹;
- Whether you wish to appear in person at the public examination; and
- Whether you wish to be kept informed of the progress of the plan.

More information on the process of public examinations into Local Plans is available by following the link below:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/531005/Procedural_Practice_in_the_Examination_of_Local_Plans_-_final.pdf

¹ As the duty to co-operate is intrinsic to how a plan is prepared, there are no modifications which can be made to address a failure to comply with it.

Reading Borough Council
 Pre-Submission Draft Local Plan
 November 2017
 Representations Form



Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title

--

Mr

Mr

First Name

--

Steven

Steven

Last Name

--

Roberts

Roberts

Job Title *(if applicable)*

--

--

Organisation *(if applicable)*

Scottish and Southern Energy

Savills

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0118 952 0501

0118 952 0501

E-mail

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Steven.roberts@savills.com

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PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CR10 - Tall Buildings

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please refer to:

Savills letter dated 26 January 2018 - ref: *18.01.26 PSLP Reg 19 Reps on behalf of Scottish and Southern Energy (Policy CR10)*

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please refer to:

Savills letter dated 26 January 2018 - ref: *18.01.26 PSLP Reg 19 Reps on behalf of Scottish and Southern Energy (Policy CR10)*

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

Scottish and Southern Energy has identified that the Pre-Submission Draft Local Plan will not plan positively for the growth objectives of Reading and fails to promote sustainable patterns of development by optimising the development potential of land in Central Reading. It is therefore necessary for the Council to reconsider its precautionary approach to tall buildings within Central Reading.

It is on this basis that Scottish and Southern Energy has requested modifications to Policy CR10 to make it sound and therefore under Section 20(6) of the Planning and Compulsory Purchase Act 2004 requests the opportunity to be heard at the Examination in Public to support the case set out in its representations referred to above.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

26 January 2018
18.01.26 PSLP Reg 19 Repls on behalf of Scottish and Southern Energy (Policy CR10)



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SENT BY EMAIL

Dear Sirs,

TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

READING BOROUGH COUNCIL – PRE-SUBMISSION DRAFT LOCAL PLAN 3036

Savills act on behalf of Scottish and Southern Energy (SSE). This letter has been prepared in response to the Council's Regulation 19 consultation on the Pre-Submission Draft Reading Borough Local Plan 2036 (PSLP).

SSE has prepared separate representations in response to draft Policy CR11g of the PSLP dated 26 January 2018. This letter specifically responds to Policy CR10: *Tall Buildings* only, but should be read in conjunction with the Policy CR11g response.

Having reviewed the Council's Statement of Consultation (SoC) on the FDLP and the PSLP, SSE consider that many of the points raised in relation to Policy CR10 have not been addressed.

Policy CR10: Tall Buildings

Central Reading has been earmarked to deliver 7,600 homes (along with 71,000 sqm of office space and 27,000 sqm of retail space) over the Plan period to 2036, which equates to nearly half the total number of homes being planned for in the PSLP. This level of growth in the centre of the town is of fundamental importance to the Council's ambitions for Reading to be the capital of the region.

With this planned growth Central Reading will become a focal point for visitors and residents alike. The Station/River Major Opportunity Area (SRMOA) has been earmarked for major regeneration in the adopted Reading Central Area Action Plan (2009) (AAP) to bring about the Council's Local Plan objectives. To deliver this it is anticipated that development will come forward at high densities to ensure that the growth needs of Reading are met.

Key to this is the Station quarter and the associated Station Tall Building Cluster (STBC), as defined by Policy CR10 of the AAP and the Proposals Map. Within this area buildings exceeding 10 storeys for office and 12 storeys for residential are permitted (defined as Tall Buildings in the AAP).

Figure 1 below shows the SRMOA and STBC, the former demarked by the dashed line and the latter by the bold dotted line.



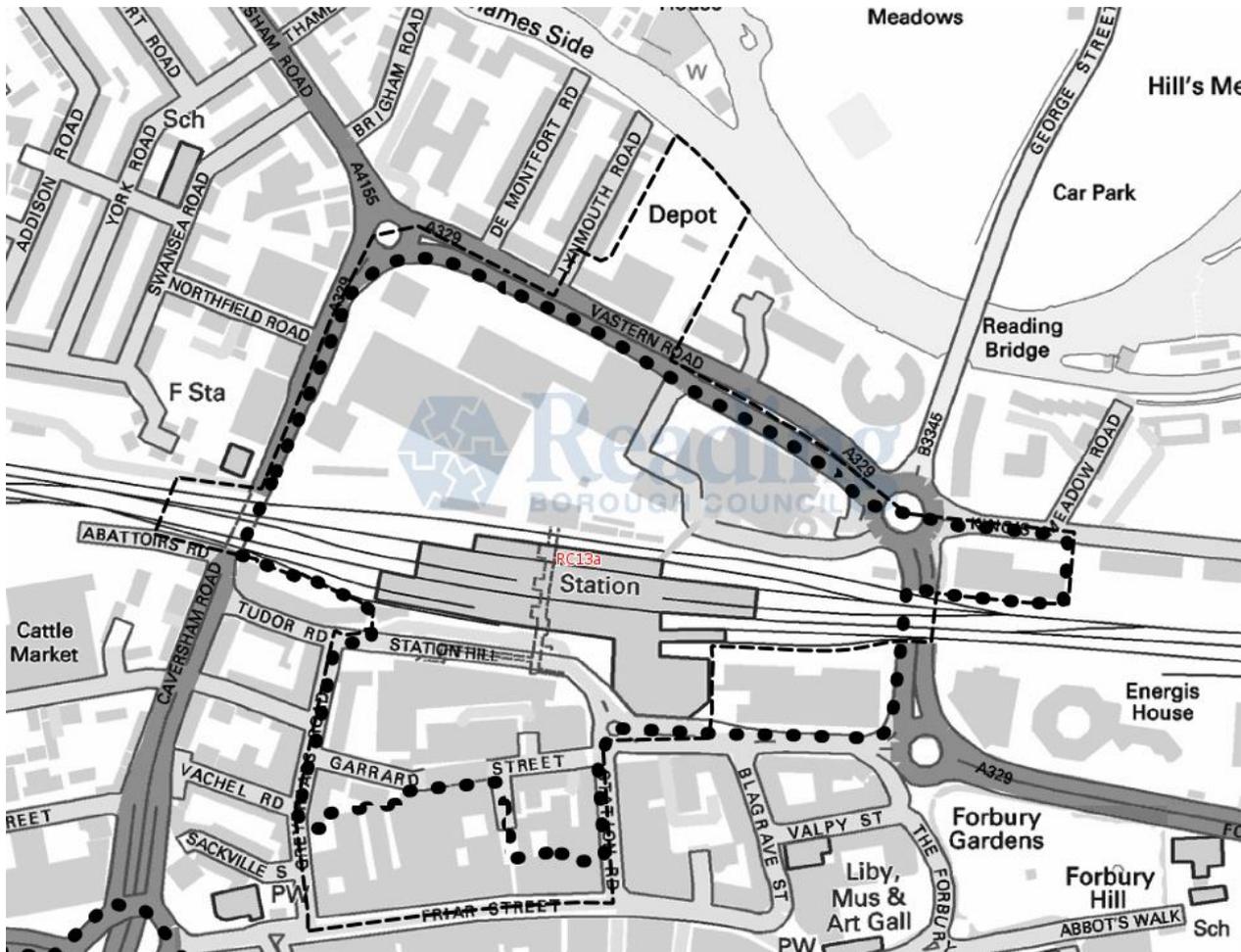


Figure 1 – Extract from Reading Borough Council Proposals Map

With the exception of some inconsequential changes to the text, draft Policy CR10 of the PSLP repeats the Council’s existing tall buildings policy (RC13 of the AAP). It continues to define tall buildings as 10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres tall) or above, and that tall buildings will only be permitted within the three ‘areas of potential for tall buildings’, i.e. the Station Area Cluster, Western Grouping and the Eastern Grouping (as identified on the Proposals Map).

The Sustainability Appraisal examines four policy options for Tall Buildings, including no policy (Option i), continue current policy (Option ii), amend policy approach to include more scope for tall buildings (Option iii) and amend to further limit scope for tall buildings (Option iv). Option (iii) is the preferred option and states that it provides for additional scope for tall buildings. SSE has compared draft Policy CR10 with adopted Policy RC13 (and the respective supporting text) and can find no changes of any substance that would provide “additional scope for tall buildings”.

AAP Policy RC13 is informed by the Reading Tall Buildings Strategy (TBS) published in January 2008. That document is 10 years old and Central Reading has seen significant change during the intervening period, in terms of its growth needs, urban context and public transport accessibility. It is our view that to simply repeat adopted policy restrictions within a rapidly changing urban environment and in the current housing climate, without any technical assessment, fails to plan positively for Reading’s current and future growth needs and is therefore fundamentally flawed.

Notwithstanding this, in light of the Council’s preferred approach SSE has reviewed the TBS, SA and draft Policy CR10 in detail and would raise the following points.

Tall Building definition

The TBS adopts the approach that 'tall' is 10 commercial storeys or equivalent. This informed the threshold in AAP Policy RC13, which has been incorporated in draft Policy CR10 of the PSLP.

However, what is tall in one context may not be termed tall in another. CABE 'Guidance on Tall Buildings' (2007) offers no definitive definition for tall buildings. Instead it refers to context, i.e. that a 10 storey building could be deemed as 'tall' in the context of two storey Victorian terraces, whereas it may not be seen as such within a city centre. The criteria for assessing tall buildings in the CABE guidance explains that it is intended for buildings that are substantially taller than their neighbours and/or which significantly change the skyline.

It is therefore our view that adopting a blanket approach to defining what constitutes a tall building across Reading is too crude, particularly in light of its new urban landscape emerging in the town centre.

Areas of potential for tall buildings

Paragraph 5.2.15 of the PSLP states that Central Reading has physical capacity to incorporate a significant level of new development at high densities. As a consequence paragraph 5.2.16 states that central Reading will accommodate 7,600 homes (along with 71,000 sqm of office space and 27,000 sqm of retail space) over the plan period to 2036, which equates to nearly half the total number of homes being planned for in the PSLP.

Tall buildings have already been planned for within the three central area clusters. However, SSE considers that there to be scope to review this across all three areas, particularly the Station Cluster, in light of the strategic importance placed on the central area to deliver growth and in view of the points raised above.

In considering the suitability of Central Reading to accommodate tall buildings the TBS assessed the townscape character, visual amenity (both within central Reading and into central Reading), historical significance, environmental constraints and market demand. This is a sensible starting point for considering the suitability of the STBC for expansion.

The TBS concludes at Figure 4.1 (page 14) that the SRMOA has townscape capacity for tall buildings (Area 22 shaded in brown). The diagram is copied at Figure 3 below.

In topographical terms, the TBS concludes on page 15 that there are no topographical reasons to restrict tall buildings in the Central Reading area, including the SSE site, stating that:

"The central area of Reading is fairly consistent in terms of topography. Topography does drop towards the River Thames and the River Kennet, but the change in topography is not marked. There is therefore no one particular area which is any more or less appropriate in terms of topography itself."

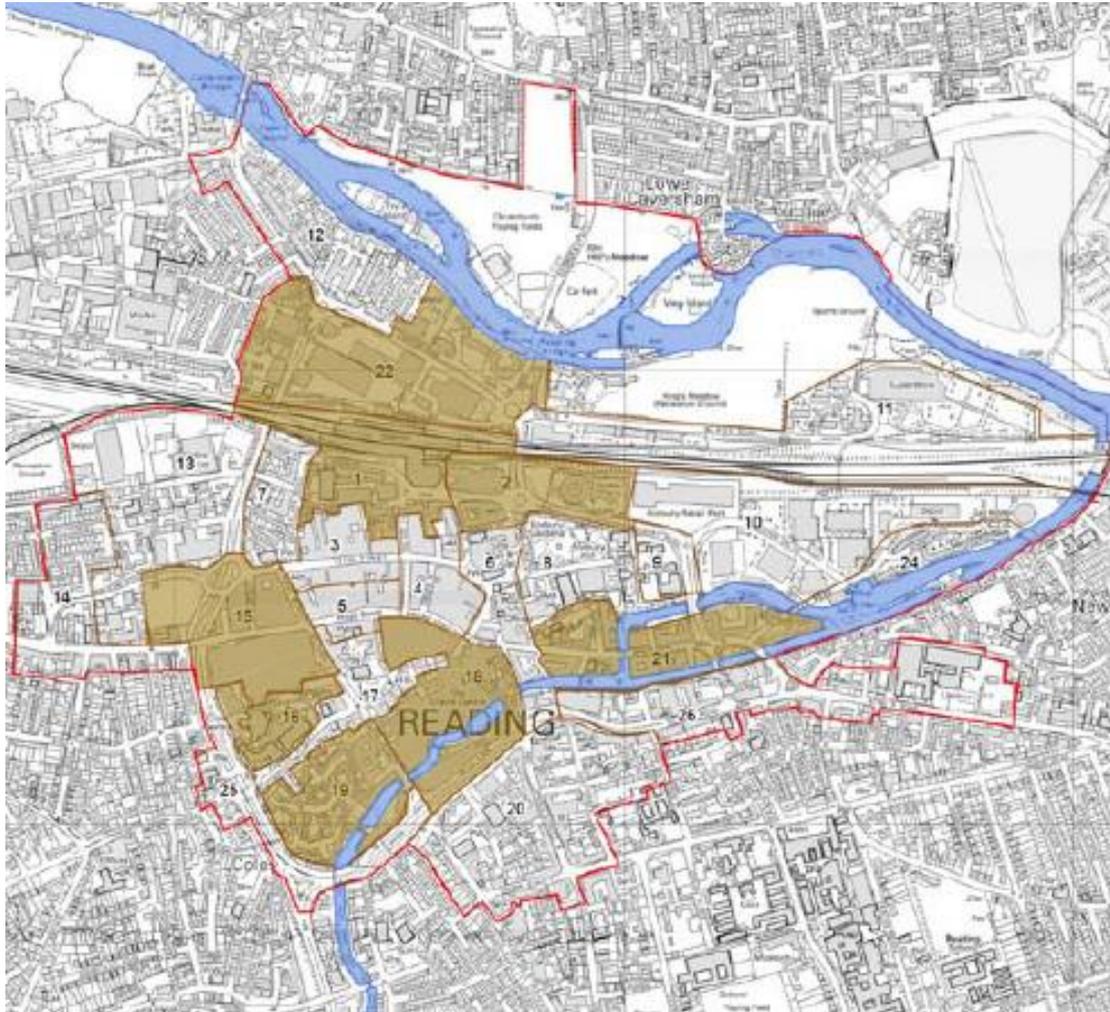


Figure 3 – Figure 4.1 in the Reading Tall Buildings Strategy

In relation to environmental constraints such as flooding, the TBS concludes that the Council's Draft Strategic Flood Risk Assessment for Central Reading land within Flood Zone 3 would not be suitable for tall buildings, stating on page 16 that:

“Due to potential flood risk, no tall buildings could be developed within zones 3b and constraints may apply to development of tall buildings within zone 3a.”

The Environment Agency Flood Map confirm that the majority of character area 22 is in Flood Zone 2, and the Council's Sequential and Exceptions Test of sites in the PSLP (dated December 2017) confirms that the draft allocations in the SRMOA pass the sequential and exceptions tests and are suitable for development.

In terms of historical significance the TBS identifies the historic core of Reading as sensitive to tall buildings. It concludes at page 19 that:

“The prospect of locating tall buildings within the Reading central area will clearly need to be mindful of the sensitivity of the historic core area, but there is an opportunity to consider locations in close proximity in order to re-establish an architectural focus that might contribute to efforts to more clearly express the significance of the surviving medieval urban form.”

Adding that:

“Clearly this would be a challenging prospect, however, if integrated in a fashion that engaged with and helped articulate the historic core area, it could play a significant role in sustaining the local historic environment.”

The TBS confirms at Figures 4.3 and 4.4 that the area does not lie in any high sensitivity local or long range views.

Townscape and Visual Assessment examined Character Area 22: Vastern Road (page 37) and concludes that townscape sensitivity in this area was low, stating that:

“The large block size which exists within the character area and the absence of any key views or visual focal point makes this an appropriate location for tall buildings.”

The TBS concludes overall that the character area has high overall suitability to accommodate tall buildings, stating that:

“The large block size which exists within the character area and the absence of any key views or visual focal point makes this an appropriate location for tall buildings. There are no key views which could be blocked by development of tall buildings. In order for tall building development within this area to be viable in terms of market considerations, there would need to be associated public realm enhancements and enhanced accessibility to improve market perception of the area.”

Although in recognition of the adjacent domestic scale residential properties the TBS comments that tall buildings should not be developed on the north and western edges of the character area, it is our view that this could still be maintained while allowing for taller buildings to come forward in areas of strategic importance, such as around key nodes and strategic movement corridors. Matters such as the transition in scale between any tall buildings and adjacent lower rise development could be appropriately dealt with at planning application stage.

On the basis of the above, SSE are of the view that the Council has ignored its evidence base in not at least considering the option of expanding the boundary of the STBC.

Having regard to the suitability of character area 22 to accommodate tall buildings as assessed in the Council’s TBS, and the enhanced sustainable travel accessibility credentials of the SRMOA with the arrival of Crossrail, the Mass Rapid Transit and the north/south movement corridor, SSE consider that the emerging draft Policy CR10 should be amended to extend the STBC to include all land within the SRMOA and thus enable Reading to realise its ambitions as a regional capital for growth and sustainability.

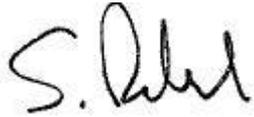
Proposed changes:

We would therefore request that draft Policy CR10 and the Proposals Map be amended to extend the STBC boundary to cover all of the SRMOA.

Conclusion

We trust that the comments made in this letter are a helpful contribution to the Local Plan 2036 process. In particular, we would highlight the requested changes that have been made in order to address aspects of draft Policy CR10 that in our view are not robust.

Yours sincerely,

A handwritten signature in black ink, appearing to read "S. Roberts". The signature is written in a cursive, slightly stylized font.

Steven Roberts
Associate

Reading Borough Council - Pre-Submission Draft Local Plan
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PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title

--

Mr

--

First Name

--

Steven

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Last Name

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Roberts

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Job Title *(if applicable)*

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Organisation *(if applicable)*

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Telephone

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0118 952 0501

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E-mail

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Steven.roberts@savills.com

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PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

Policy CR11 - Station/River Major Opportunity Area

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please refer to:

Savills letter dated 26 January 2018 - ref: *18.01.26 PSLP Reg 19 Reps on behalf of Scottish and Southern Energy (Policy CR11)*

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please refer to:

Savills letter dated 26 January 2018 - ref: *18.01.26 PSLP Reg 19 Reps on behalf of Scottish and Southern Energy (Policy CR11)*

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

Scottish and Southern Energy has identified that the Pre-Submission Draft Local Plan will not plan positively for the growth and sustainability objectives of Reading and fails to promote sustainable patterns of development by optimising the development potential of land in Central Reading. It is therefore necessary for the Council to reconsider its approach to the draft allocation at CR11g Riverside to ensure that the Council's objectives are achieved over the plan period.

It is on this basis that Scottish and Southern Energy has requested modifications to Policy CR11 to make it sound and therefore under Section 20(6) of the Planning and Compulsory Purchase Act 2004 requests the opportunity to be heard at the Examination in Public to support the case set out in its representations referred to above.

B7. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

26 January 2018

18.01.26 PSLP Reg 19 Repls on behalf of Scottish and Southern Energy (Policy CR11)

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SENT BY EMAIL

Dear Sirs,

TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

READING BOROUGH COUNCIL – PRE-SUBMISSION DRAFT LOCAL PLAN 3036

Savills act on behalf of Scottish and Southern Energy (SSE) in relation to their site on Vastern Road, Reading ('Site'). This letter has been prepared in response to the Council's Regulation 19 consultation on the Pre-Submission Draft Reading Borough Local Plan 2036 (PSLP).

The site is identified by PSLP Policy CR11g as a sub-development area referred to as 'Riverside' and earmarked for residential development.

SSE made representations in response to the Council's Regulation 18 Draft Reading Borough Local Plan 2036 (FDLP) consultation in June 2017. The comments made in those representations have been summarised in the Council's Statement of Consultation (SoC) on the FDLP (November 2017).

Having reviewed the Council's SoC and the PSLP, SSE consider that some of the points raised previously in relation to the allocation under draft Policy CR11g remain unresolved and that these issues could put the deliverability of the policy at risk.

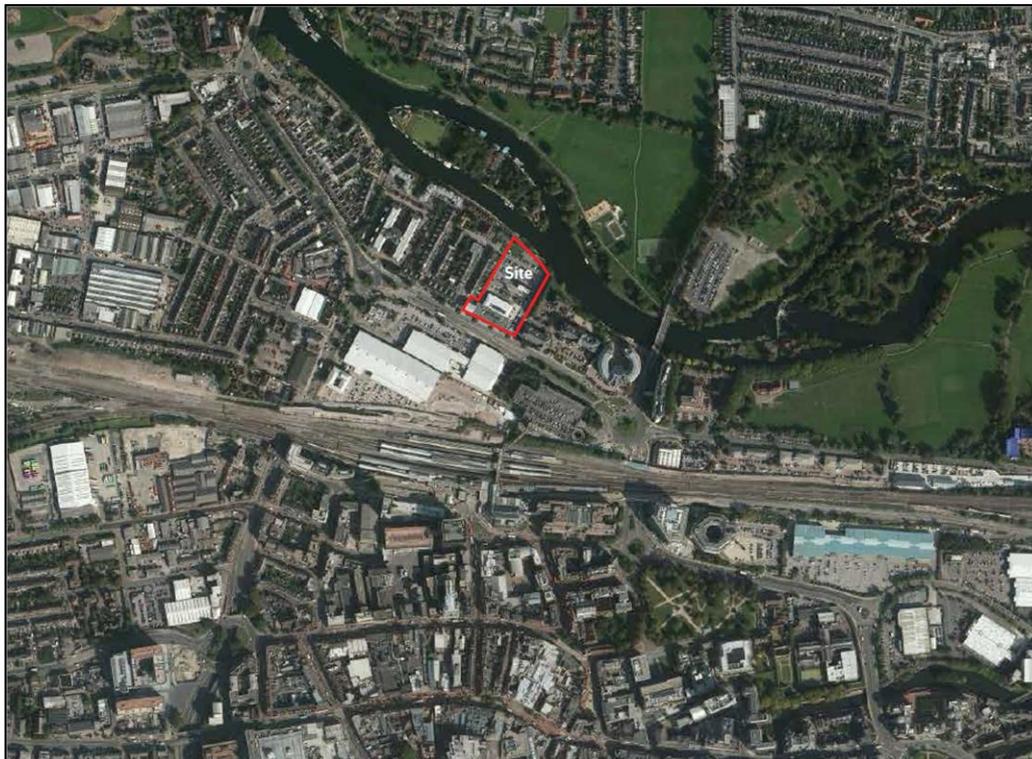
Site

The site is identified on the map below and comprises a rectangular shaped land parcel approximately 1.24 hectares in area. It lies in the Central Reading area and is located to the north of Reading Train Station and the town centre. It is bound by the River Kennet to the north, Norman Place office development to the east, Vastern Road to the residential properties on Lynmouth Road to the west.

The site comprises office accommodation fronting Vastern Road, with operational electrical equipment located centrally. Vehicular access is available from Vastern Road and Lynmouth Road.

The site is in Flood Zone 2 (Medium Probability of Flooding) and as such the Council has undertaken a sequential and exceptions test in accordance with the NPPF.





Scope of Response

These representations focus on draft Policy CR11: *Station/River Major Opportunity Area* and should be read in conjunction with our separate response to draft Policy CR10: *Tall Buildings* dated 26 January 2018.

Where we have suggested changes to Policy CR11, text to be deleted is shown with a ~~strikethrough~~ and new text is shown underlined.

Policy CR11 – Station/River Major Opportunity Area

SSE welcomes the inclusion of a draft site allocation under sub-area Policy CR11g: *Riverside* for residential development, with an indicative density range of 201-298 dph (250-370 units).

However, we have a number of concerns about the specific requirements of the policy and the potential negative impact these may have on the deliverability of the policy and therefore the Council's ability to implement its Local Plan vision for the Station/River Major Opportunity Area.

10m setback from the river

Draft Policy CR11g requires a set back from the river of at least 10m, which is not a requirement of the adopted site allocation¹. No justification for this requirement has been provided in the supporting text or the Council's evidence base. In fact it conflicts with draft Policy EN11: *Waterspaces* and CR3: *Public Realm in Central Reading*, which requires development adjacent to the river to enhance the relationship of buildings to the watercourse and to engage with the waterfront location with active frontages and engaging elevations.

¹ Policy RC1g of the Reading Central Area Action Plan (adopted 2009)

The Council's Statement of Consultation on the FDLP suggests that the 10m requirement is a response to the immediate context, where the Council claims is characterised by existing development set back by 8-9m. In our view this approach prejudices what proposals could come forward on this site, as well as what is and is not an acceptable relationship with the waterfront. This view has been taken by the Council in the absence of any evidence that assesses the particular visual and landscape qualities of the river and its sensitivity to development. In our view, imposition of a 10m setback in the allocation with no evidence to support the approach is both unacceptably restrictive and goes beyond the remit of a Local Plan, which should be dealing only with principles.

This requirement places an unnecessary development constraint on the site which potentially puts at risk other Council objectives to deliver as many homes as possible over the Plan period and to create a north/south connection between the river and town centre. This runs contrary to paragraphs 17, 47 and 58 of the NPPF in failing to make efficient use of land by optimising the development potential of site to boost housing delivery.

Open space at the riverside

Policy CR11g states that any development should continue the north/south pedestrian and cycle link from the station, with *"potential for an area of open space at the riverside"*. SSE would endorse the objectives of the north/south route and the associated green link, but object to the requirement for an area of open space at the riverside, which in their view would place a further development constraint upon the site, putting at risk the other objectives of the Local Plan and draft Policy CR11.

It is acknowledged that the wording only indicates that the open space may be provided, however, Figure 5.3 Station/River Major Opportunity Area Strategy identifies a 'new area of open space'. On this basis, SSE are concerned that this will establish the requirement for an area of formal open space adjacent to the river.

Paragraph 73 of the NPPF states that:

"Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision."

The Council has not provided any evidence to support the requirement for formal open space on the site, which is contrary to the NPPF. On this basis, any open space requirement should be determined as part of a planning application in accordance with draft Policy EN9.

Notwithstanding this, from a review of the Local Plan, and having regard for both existing and planned public open spaces close to the site (i.e. Christchurch Meadows to the north and the new civic spaces to the north and south of the train station), it is clear that the Council has not considered how these open spaces would be complimented by a new space on the site and how this would provide diversity across Reading's open space network. It is our view that the green link requirement of Policy CR11g, presents an opportunity to provide variety in the network and would be of far greater value than a formal open space on the site.

Office and leisure uses

Policy CR11g states that the main use of the site should be residential, but adds that *"some small scale offices and leisure will also be appropriate"*. The indicative site capacity indicates 1,000-2,000 sqm of leisure and no net increase of office floorspace.

The evidence base does not support the provision of non-residential uses on the site. In fact the spatial strategy for Central Reading states at paragraph 3.2.4 that the Local Plan will provide for up to 27,000 sqm of town centre uses, which is a significant reduction from the 40,000 sqm stated in the FDLP (paragraph 3.2.4).

On this basis, there is no evidence to support an approach that would reduce the number of homes delivered on a central Reading site, contrary to paragraph 47 of the NPPF.

Status of north/south route

SSE welcomes the recognition of the north/south pedestrian and cycle link as a Council priority at paragraph 5.4.6 and how this will be a given substantial weigh for decision taking purposes. However, Policy CR11g should also recognise the strategic significance of this movement corridor and require the scale of development to be informed by this important status.

On the basis of the above, SSE request that Policy CR11g be amended to ensure that the policy is deliverable and to enable the Council to realise its objectives.

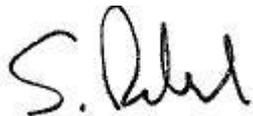
~~“Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from form an appropriate visual and physical relationship with the river. Development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, and its form and scale should respond to the strategic importance of this new connection with potential for an area of open space at the riverside. The main use of the site should be residential, although some complementary small-scale offices and leisure will also be acceptable appropriate.”~~

Site size: 1.24 ha Indicative potential: 250-370 dwellings, 1,000-2,000 sq m of leisure, no significant net gain in offices.”

Conclusion

SSE trust that the comments made in this letter are a helpful contribution to the Local Plan 2036 process. In particular, SSE highlight the requested changes that have been made in order to address aspects of the draft Local Plan that in our view are not robust.

Yours sincerely,



Steven Roberts
Associate