

**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**

**CLOSING STATEMENT OF CASE  
ON BEHALF OF THE THAMES PATH RESIDENTS ASSOCIATION**

**Date:** 18 November 2021

Mr Sebouh Sarafian  
General Secretary of the Thames Path Residents Association  
20 Lynmouth Road  
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## **Introduction**

1. I am the General Secretary of the Thames Path Residents Association
2. I live at 20 Lynmouth Road
3. My house overlooks the current SSE site under consideration.
4. I have a BSc degree in Mathematics from King's College London University
5. I am a UK qualified Chartered Accountant (CIMA)
6. I am a Oracle Functional Consultant/Project Manager who sets up Financial systems and processes for large multinational companies.

Thank you all for your patience when dealing with someone who does not deal with the legal side of large projects and is therefore unfamiliar with the legal processes surrounding an inquiry.

My closing segment is as follows:-

## **Background: Housing Needs**

The total budgeted number of housing units needed to be built in the Reading area is determined by Central Government based on the projected growth and movement of the UK population over a 5 year period.

The SSE site was one of multiple brownfield sites allocated for redevelopment by Reading Borough Council (RBC) to meet the expected growth in housing needs in the Reading area.

Reading Borough Council budgeted for between 250 and 370 housing units to be built on the whole of the SSE brownfield site. The allocation was calculated in 2017.

### **SSE Site**

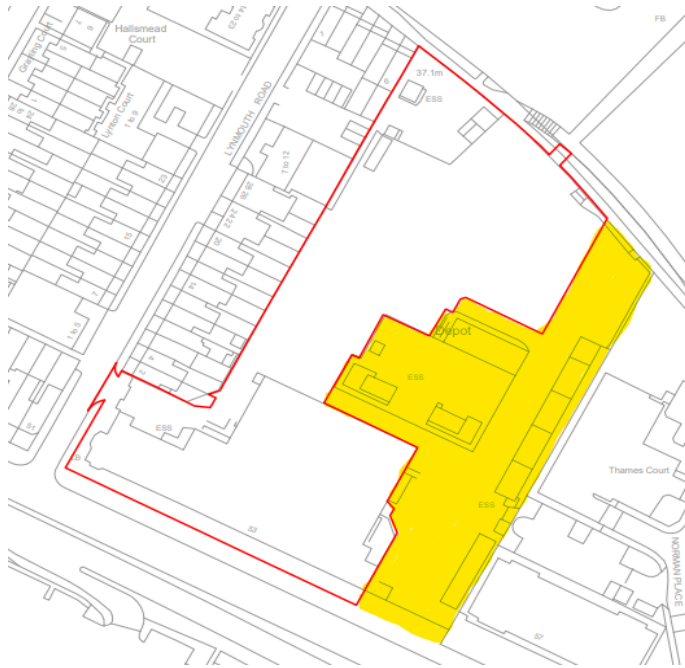
Part of the SSE site was purchased by Berkeley Homes for development.

#### **a) Number of Housing Units**

##### **Issue 1:**

Of the total SSE site area (1.24 hectares), a large area (0.48 hectares) was not purchased because it contained the electricity transformers. The area not bought consisted of 39% of the total area SSE site area.

Therefore, the total amount of area available for development was significantly reduced. Although informed that the Reading Borough Council and Berkeley Homes agreed on a revised budgeted number of housing units based on the reduced area available, I have not been able to find this revised figure.



By my calculations, the revised number of units should be in the range 153 to 226 housing units.

The diagram above shows the SSE site area that was not purchased.

### **Issue 2:**

The area not purchased lies in the central and Eastern portion of the site. The area would have contained a larger proportion of the tall buildings in the site because it is away from the sensitive residential areas on the West side of the development. In addition, the river frontage of the remaining site is only  $\frac{1}{4}$  of the total, so there would be less loss in potential development area due to ecological and other reasons.

If we assume a conservative 10% additional building density in the unpurchased area above the baseline density for this site, the expected range of houses that can be built by Berkely should be reduced to, at the most, 138 to 203 units.

### **Issue 3:**

Due to the piecemeal purchase of the site, there is a loss in efficiency in the number of units that can be built. This is because buildings built in the remaining part of the site will need their own civilian access to Vastern Road, to the foot bridge, and for other emergency services to access the remaining site.

This inefficiency should also be reflected in the reduction of the potential number of units that can be built in the overall site, and therefore the budgeted number of units for the Berkeley Homes site.

### **Issue 4:**

The initial housing projection for the area, that was calculated in 2017, has to be revised based on events in the last 4 years.

Since the projection in 2017, the UK has been impacted by BREXIT (reduction in workforce needed in the area and the return of European workforce to the continent), and COVID (that changed the work/travel dynamics of the country).

RBC have stated that the projected housing needs of the Reading area are now less than what was given in the 2017 projection. Berkeley Homes is disputing the need to reduce the projected housing needs of the area.

Reading Borough Council is authorised to administer the needs of the Reading residents. They have a duty to do so, and are accountable to the residents of Reading, and the UK government for their decisions and actions. Berkeley Homes is accountable to their shareholders. Therefore the Reading Borough Council housing projection should carry more weight when determining the future needs of the area.

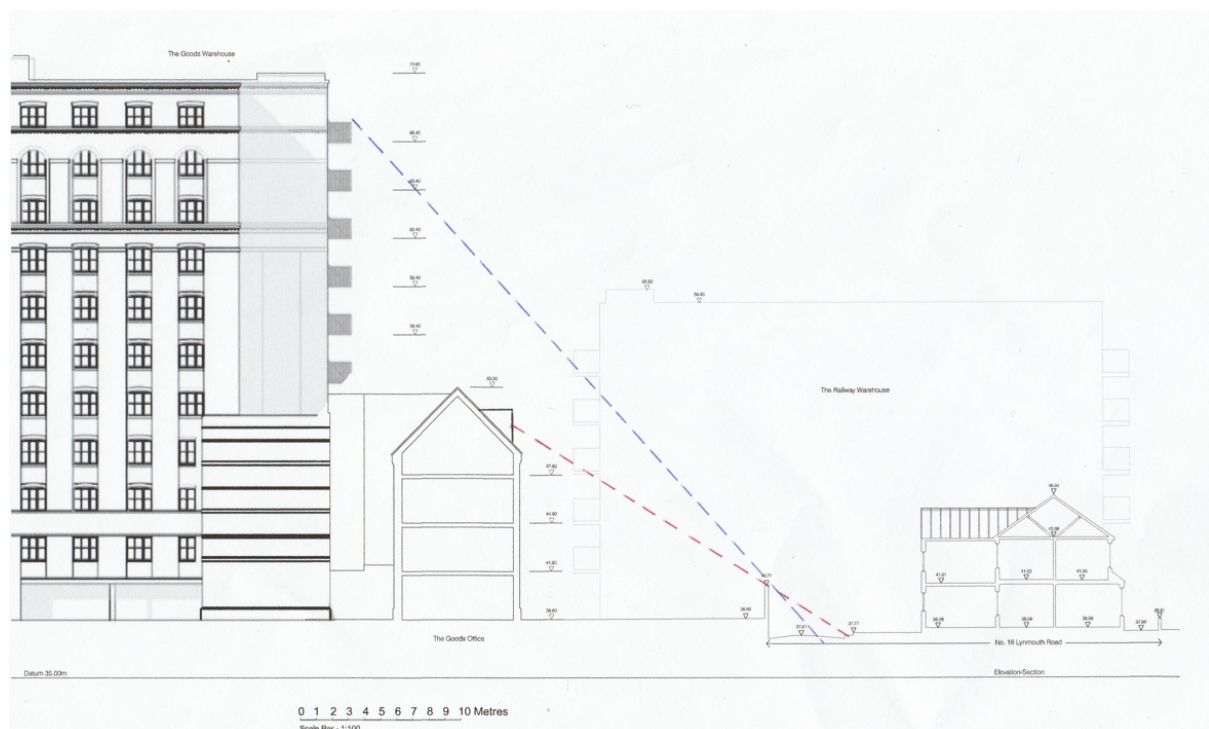
Berkeley Homes, by this appeal, is trying to usurp the housing administration of the area, while remaining unaccountable for the long term consequences of their plans.

## **b) Living Conditions**

Berkeley homes contend that the 4 storey building overlooking the gardens of Lynmouth Road will not be overbearing and will not lead to an unacceptable level of overlook.

Berkeley homes has admitted that trees planted along the perimeter of the site are not there to provide cover, but are there for aesthetic and environmental reasons.

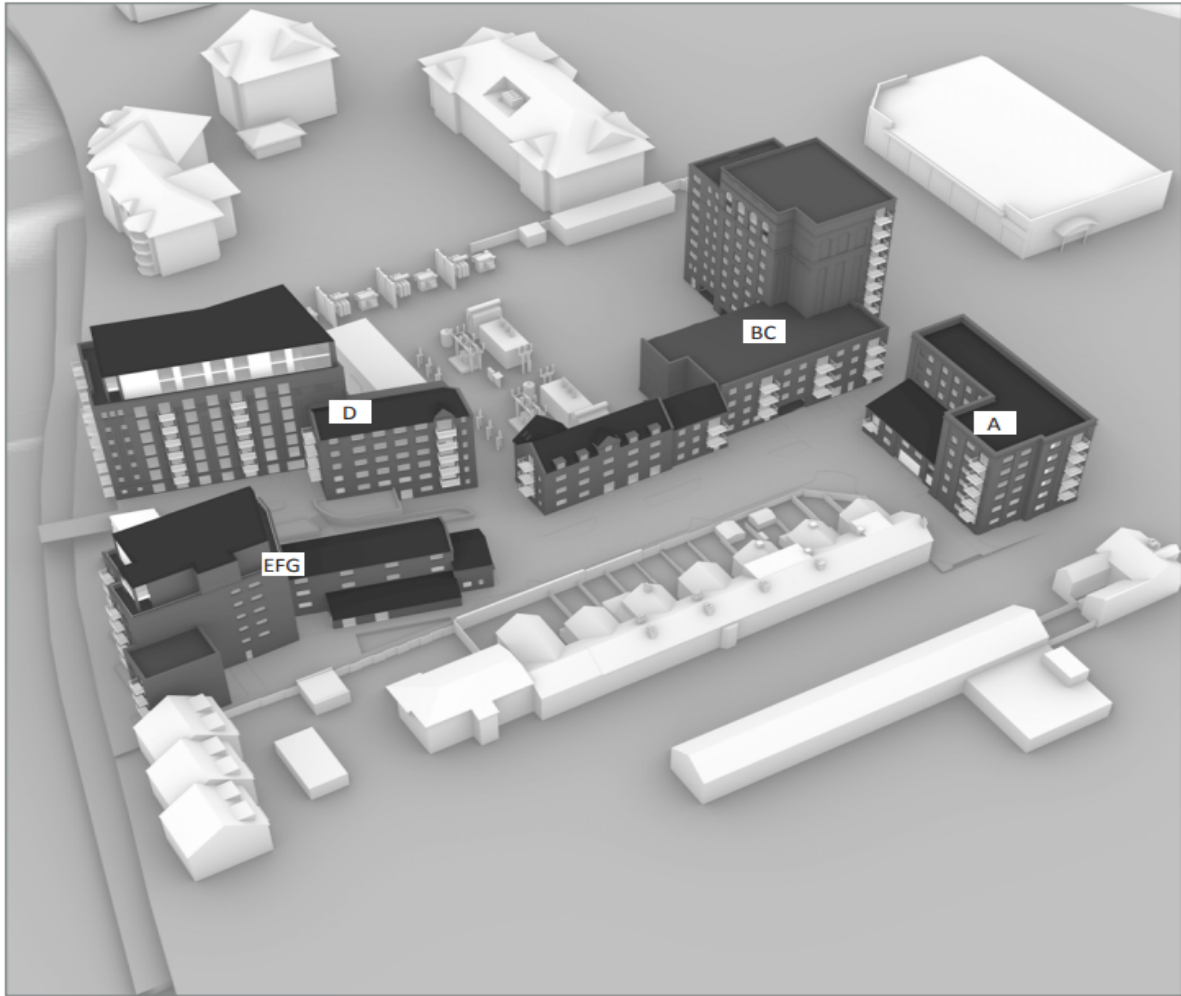
The diagram below shows the area that can be seen (ignoring the trees since they are not there to specifically block the overlook into the gardens of Lynmouth Road).



The red line is the view from block C (4 storey building directly behind Lynmouth Road) and the blue line from block B (further away). As can be seen the gardens facing Bloc C are overlooked by all 5 top floor units in Block B.

The cross-section diagram shows that the 4 storey building (Block C) will have an unacceptable level of overlook into the gardens and back rooms of the houses in Lynmouth Road.

See below for a diagram of what the site will look like in 3D..



In addition, part of block C is only 3 storeys tall, so there is no reason that this heigh cannot be used for the remainder of block C. The height of block B could also be reduced for the same reason (*if possible*). See shaded area in diagram below.



The reduction of storeys of Block C to 3 storeys will reduce the number of units by 5, but will protect the privacy of the residents of at least 10 of the houses on Lynmouth Road.

### **c) Traffic Congestion**

Reading Borough Council and Berkeley Homes have agreed to create a pedestrian/cyclist crossing point from the SSE across Vastern Road. Berkeley Homes will contribute a sum of money to RBC to create this crossing point. This is welcome by the Thames Path Residents Association.

In addition, the new residents of the blocks will not be allowed to park in the surrounding areas. This will be a legal restriction. These restrictions are welcome (with reservations) by the residents in the neighbouring roads. Trade vehicles servicing these new dwellings will have a licence to park in the surrounding streets and will impact the parking spaces in the surrounding area.

The Berkeley Homes study concluded that there would be no traffic congestion caused by the delivery of items to the block of flats, although this assertion does not seem intuitive.

As stated before, Berkeley Homes is **not accountable** in the future to the residents in the area if these assertions are wrong. Reading Borough Council is accountable. We would therefore like to be guided by the experts used by Reading Borough Council on this point.

### **d) Flooding**

The site will contain a drainage system that will reduce the risk of flooding and will now incorporate features that will stop the water flooding from the site into the surrounding gardens that are at a lower level.

As stated before, Berkeley Homes is **not accountable** in the future to the residents in the area if these features fail to stop the flooding of nearby gardens.

We would like legal assurances that our gardens will not be flooded due to this development.

## Summary

In summary, the current plans are not supported by the Thames Path Residents Association because:

1. Overlook: The buildings significantly damage the privacy of the residents of Lynmouth Road.
2. The budgeted number of houses are not flexed and reduced sufficiently to take into account the factors given in part (a) above. Therefore, the 209 units pushed for by Berkeley Homes are in excess of what should be permitted, resulting in the need to build taller buildings than are necessary.
3. There is a clear failure to fully futureproof the remaining area for future development. The electricity transformers will be a poison chalice for any future developers to contend with, which will hinder the sale of the remaining site and stifle the development of the remaining 0.48 hectares of brownfield land.
4. The visual dominance and overbearing effects of the tall buildings that are being proposed will damage the aesthetic beauty of the area.

On a final note, I am appalled that we have had to have this inquiry.

- I feel that Berkeley homes did not scope the project at its outset and are now trying to strongarm this development on the residents of Reading.
- The legal costs for this Inquiry is an appalling waste of money, both for the Berkeley Homes shareholders and the Reading taxpayers.

It would have been better for a plan to be submitted for the development of the whole 1.26 hectare site (a comprehensive approach).

The piecemeal sale of the SSE site led us down this current path, leading to a missed opportunity for Berkeley Homes, Reading Borough Council, and to the residents of Reading (my home town for over 50 years).