

Call for sites information for allocated sites in the LPPU

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CR11d: Brunel Arcade and Apex Plaza

(information for Apex Plaza element only)

From: [Jack Karagoz](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-522230943
Date: 07 June 2023 16:39:26
Attachments: [Apex CFS Letter Final.pdf](#)

Name: Jack Karagoz

Organisation (if applicable): Daniel Watney LLP

On behalf of: LEGAL & GENERAL ASSURANCE PENSIONS MANAGEMENT LIMITED

Telephone: 02030773400

Email address: jkaragoz@danielwatney.co.uk

Site address: APEX, FORBURY ROAD, READING RG1 1AX

Are you the owner: Yes

Are you a freehold or leasehold owner?: Freehold

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: No

What is the size of the site in hectares?: 0.97

What is the current land use of the site?: Please refer to covering letter

What is the proposed land use of the site?: Please refer to covering letter

Has there been any recent market interest in the proposed use of the site?: Not known

What is the likely timescale of the site becoming available during the plan period?:
Please refer to covering letter

Is the site already allocated in a development plan?: Yes

If yes, and the proposed use is different, why do you consider that the allocation should be changed?: Please refer to covering letter

Please give any other information that you consider relevant to enable assessment of the candidate site: We are submitting a covering letter with further information including an appended site location plan (scale 1:1250)

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : Apex CFS Letter Final.pdf

7 June 2023

Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Dear Sir/Madam,

**LOCAL PLAN PARTIAL UPDATE – CALL FOR SITES
RE: SUBMISSION OF LEGAL & GENERAL ASSURANCE PENSIONS MANAGEMENT
LIMITED – APEX, FORBURY ROAD, READING RG1 1AX**

We write on behalf of our client Legal & General Assurance Pensions Management Limited (L & G), to submit Apex on Forbury Road to the Council's call for sites. L&G is the freehold owner of the office building.

The Site

Apex is located on Forbury Road, which links Reading Station approximately 50 metres to the west, with the A32. It was built during the late 1980s across a 0.3 ha site and comprises a basement car park, ground and six upper office floors with retail units at ground floor level. It provides in the order of 30,000sq m of floorspace gross. A site location plan is attached at Appendix A.

The building is not listed, nor is it within a Conservation Area or archaeological priority area.

Recent planning permissions have allowed the building's modernisation, including the remodelling of the principal western entrance and reception area, new plant, public realm improvements and the change of use of ground floor units to retail. The building has also been painted. These investments have been made to secure new tenants for the medium-term, however, in the longer-term 11-15 years into the new Local Plan period there remains the potential that this site come forward for redevelopment.

The Proposals Map of the adopted Local Plan already shows Apex as forming part of a wider site for future high density mixed-use development within the Station/River Maor Opportunity Area of Reading. Brunel Arcade which is owned by Network Rail and provides retailing leading towards the station entrance and includes a linking footbridge to Apex, forms the other part of the site allocation. Apex falls within a Tall Buildings Cluster and the Office Core. A cycle route is shown to its perimeter following the course of the surrounding pavement. It is adjacent to, but outside of the primary shopping frontages of the Town Centre.

It is therefore already established as a development allocation for housing and office together with retail and leisure development which we must be maintained, subject to the following modification:

Representation

- (i) **That Apex should be the subject of its own allocation, or the allocation should make clear that Apex is able to come forward for future development independently.**

The separation of Apex from the Brunel Arcade would recognise that development timings may differ and enable greater clarity over the development capacity figures which were pooled for both sites in the adopted Local Plan.

- (ii) **The indicative development capacity figures of the adopted Local Plan are very conservative, and explicit acknowledgement should be made that there is the potential for the total development floorspace and for the and mix of uses to vary from them depending on market demand at the time a scheme comes forward and the quality of design.**

The adopted Local Plan identifies Apex as lying within the Station Area Cluster referred to in policy CR10 as appropriate for tall buildings. Tall buildings in the Borough are defined by policy CR10 as 10 commercial storeys in height, or 12 residential storeys. The Reading Station Area Framework states that tall buildings should rise- up around the Station 'nexus' and that the approach to building heights should be dramatic with a new cluster of tall buildings forming a new and distinctive skyline for the Station Area. It promotes a dome of development, with the area of greatest permissible height to be located immediately adjoining and to the south of the Station entrance, near to Apex.

However, the adopted site allocation includes indicative development capacity figures which are, confusingly, expressed as net uplift above the existing floorspace of both Apex and Brunel Arcade rather than being individually apportioned, and which are only 250-380 dwellings, 3,000-5,000s m net gain of offices and 1,000- 2,000s m net gain of retail and leisure. The illustrative figures were informed by a Housing and Economic Land Assessment commissioned by the Council in 2017. We understand that it assumed only a 7- storey, mixed-use redevelopment of Apex, with 66 site coverage delivering in the order of 43,000s m gross floorspace in total, notwithstanding the policy support towards a tall building and the site's outstanding level of accessibility. The assumption appears to have been made without detailed evidence and is considered by L&G to be a significant under estimation of the site's potential, even taking in to account the need for development to consider the setting of nearby heritage assets. The Apex site could make a much greater contribution in the long term towards local office and housing need and indeed, a much greater scale would be critical to development viability.

- (iii) **Whilst separating out Apex from the Brunel Arcade, L&G remains supportive of the principle of development over the Arcade site which is capable of co-existing with Apex.**

It would be necessary to ensure that development over the Brunel Arcade did not prejudice the operation, or future development potential of Apex including mutual daylight and sunlight impacts and public realm provision.

Conclusion

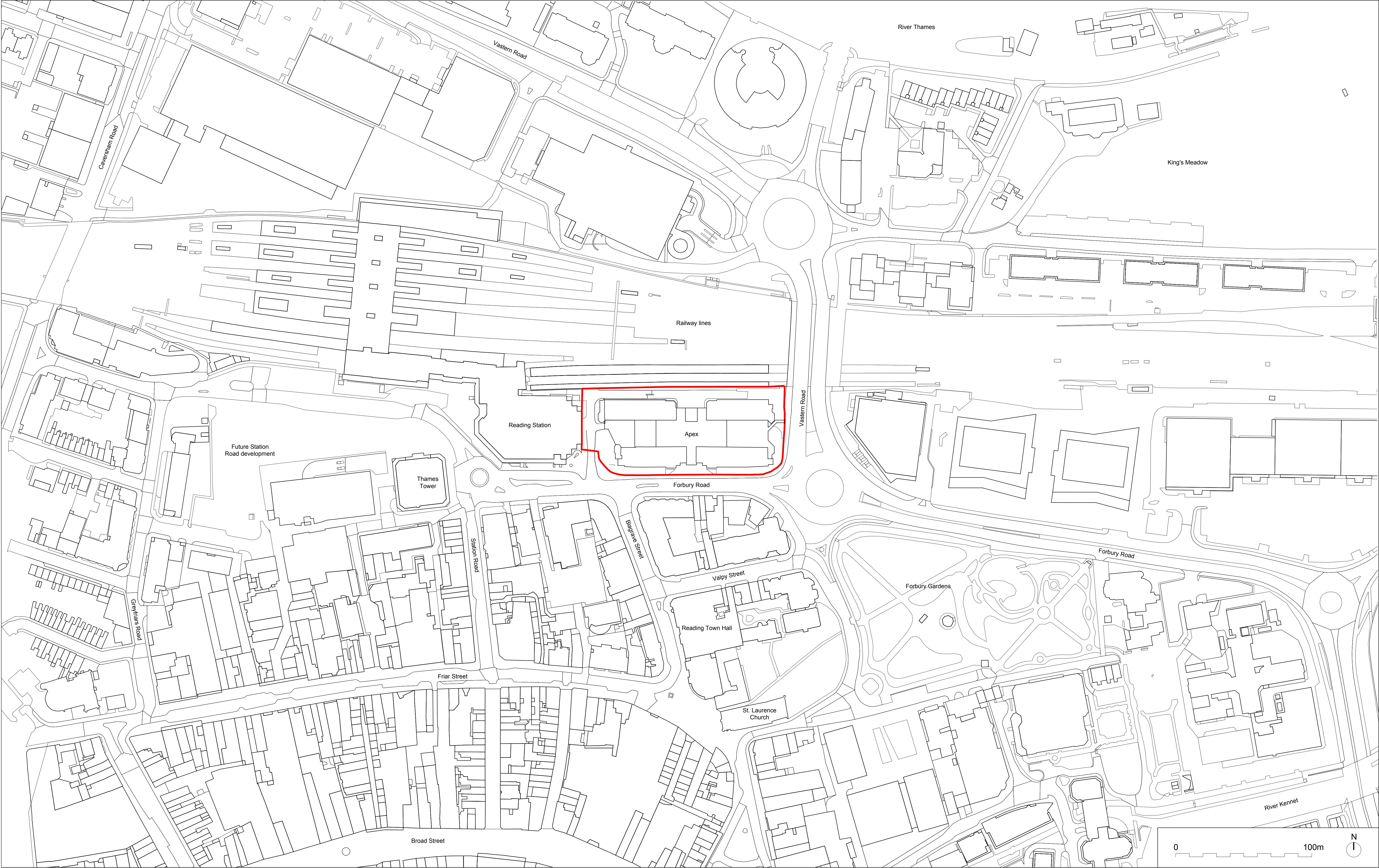
We would be grateful for an acknowledgement of this submission and look forward to being consulted again in due course as the new Local Plan progresses. Notwithstanding, should any additional information be required or if you have any questions about this application then please do not hesitate to contact Nick Delaney of this firm.

Yours faithfully,



Daniel Watney LLP
T: 020 3077 3400
E: ndelaney@danielwatney.co.uk

Appendix 1: Site Location Plan



DO NOT SCALE FROM THIS DRAWING. ALL CONSTRUCTION INFORMATION SHOULD BE TAKEN FROM FIGURED DIMENSIONS ONLY.
DETAILS AND SIZES SHOWN ARE INDICATIVE ONLY AND ARE SUBJECT TO CONFIRMATION BY THE RELEVANT SUB CONTRACTOR.
IT IS THE CONTRACTOR'S RESPONSIBILITY TO CHECK ALL DIMENSIONS ON SITE.
ANY DISCREPANCY IS TO BE REPORTED TO THE ARCHITECTS FOR CLARIFICATION.
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Notes
PROJECT SPECIFIC NOTES.
TEXT SIZE AFA 1.5.
LAYER: TITLE SHEET

Rev	Description	Date	Drawn by	Checked by

Rev	Description	Date	Drawn by	Checked by

suttonca

76 Charlotte Street, London W1T 4QS, T.02076364508
E. studio@suttonca.co.uk

Apex Plaza, Reading
Planning
Site Location Plan

Scale: 1:1250 @ A1
Date: Jan 2021

Drawn by
RJ

Checked by
CS

Job No.
1332

Orig No.
0300

Rev.
/

Stage
RIBA STAGE 3

CR12a: Cattle Market

From: [Nick Kirby](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-522416239
Date: 08 June 2023 12:14:09
Attachments: [cattle market-22.11.2022.PDF](#)

Name: Nick Kirby

Organisation (if applicable): Lichfields

On behalf of: Thimbleby and Shorland

Telephone: 01183341920

Email address: nick.kirby@lichfields.uk

Site address: Cattle Market, Great Knollys Street, Reading, RG1 7HU (Local Plan allocation CR12a)

Are you the owner: Part owner

Do the owners, or other part owners, support your proposal?: Yes

Are you a freehold or leasehold owner?: Leasehold

What is the remaining term on your lease?: Reading Borough Council (RBC) own the site. Thimbleby and Shorland are a lessee with an unexpired lease of the land hatched blue on the submitted plan.

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: Yes

Please give details of these agreements or covenants: The provisions of the Berkshire Act in relation to the market would need to be addressed but are not considered to be a fundamental constraint to development of the site.

What is the size of the site in hectares?: 2.46

What is the current land use of the site?: Auction and market site in substantial part, small car park, some small scale current temporary housing use by RBC (providing housing for homeless residents)

What is the proposed land use of the site?: Residential (circa 800 to 1020 units). Non residential floorspace expected to complement the residential use.

Has there been any recent market interest in the proposed use of the site?: Yes

Please provide further details of the recent market interest: Various speculative approaches from residential developers.

What is the likely timescale of the site becoming available during the plan period?: 1-5 years

Is the site already allocated in a development plan?: Yes

If yes, and the proposed use is different, why do you consider that the allocation

should be changed?: A reduction in proposed non residential floorspace:

It is not considered that there is demand for the type and scale of retail development allocated by Local Plan allocation CR12a at the site. The 'Review of Reading Local Plan 2019' (March 2023) document notes significant changes to shopping patterns have emerged in recent years. It states when commenting on policy RL2 which relates to the Scale and Location of Retail, Leisure and Culture Development:

"The retail and leisure needs identified in the Western Berkshire Retail and Commercial Leisure Assessment were based on survey work undertaken in 2016 and are now therefore seven years old. Since then, there have potentially been significant changes to shopping patterns. The Assessment did account for an expansion of online retailing, but the rate of this change may well have significantly increased as a result of the Covid-19 pandemic, which may also have altered the balance between shopping in larger town centres as opposed to smaller district and local centres" (para 3.569, page 85)

The proposed reduction in retail provision at the site is consistent with the need identified by Reading Borough Council to review policy RL2 in order to "reassess needs for retail and leisure development to take account of changes to shopping patterns, in particular to take the impact of Covid into account" (para 3.570, page 86)

The proposals will incorporate an element of non-residential floorspace which would be considered to complement the residential use proposed. We anticipated the reduction in retail floorspace would create an opportunity for a greater level of floorspace for alternative uses which are appropriate in a town centre location to meet Borough wide needs

Removal of public car park:

It is not considered that a public car park is required at the site given existing Town Centre provision available. RBC's Corporate Plan seeks to create a Healthy Environment by "investing in walking, cycling, and public transport and tackling congestion" (Corporate Plan, 2023, page 14). This Corporate Plan (page 10) confirms that RBC has commissioned a review of the Council's Town Parking Strategy. Omission of a public car park at the site will be consistent with corporate objectives to achieve modal shift and create a healthy environment.

Increased residential delivery:

The alternative configuration outlined within this submission includes a higher number of residential units than identified in the current allocation by policy CR12a, reflecting a reduction in the proposed non-residential floorspace at the site, together with increasing the density of development at the site, subject to detailed design considerations. Increasing the density of the proposed development is considered to be consistent with the emphasis of the NPPF.

The 'Review of Reading Local Plan 2019' (March 2023) document acknowledges an inconsistency between how the issue of density is approached between the current NPPF (2022), and NPPF (2012), the latter of which is the version against which the current Reading Local Plan was examined. The Review of the Local Plan 2019 document states:

"The most up-to-date NPPF states that minimum density standards should be set for city and town centres and other locations that are well-served by public transport, and that these should seek a significant uplift in the average density of residential development.

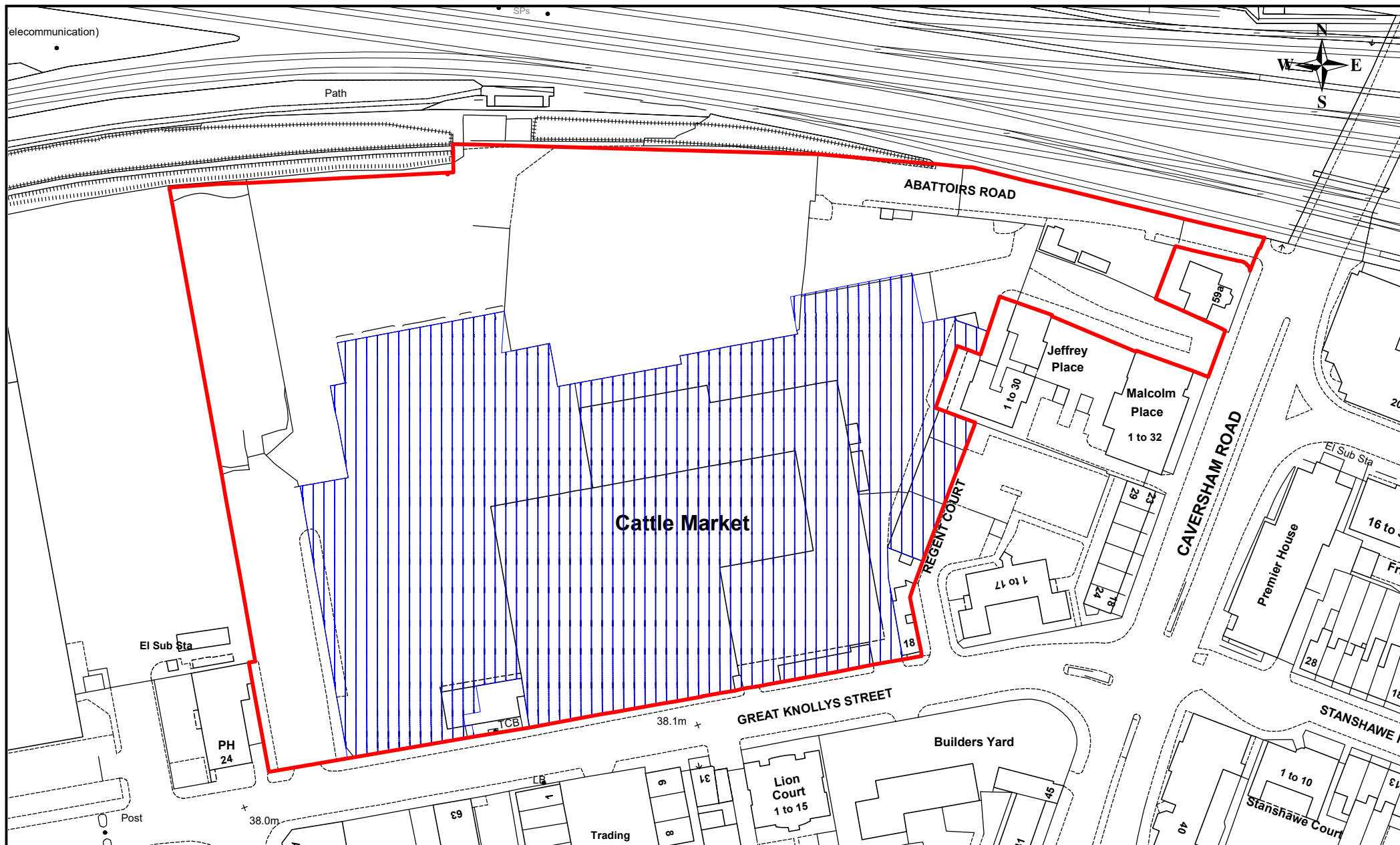
This will apply to significant areas of Reading, and, since policy H2 is not currently expressed in terms of minimum density, this will require an update to the policy” (para 3.353, page 59)

The proposal to increase the residential delivery at the site is consistent with the approach of optimising density in this sustainable town centre location, and it is anticipated that RBC’s review of policy H2 will support the proposed approach.

Please give any other information that you consider relevant to enable assessment of the candidate site: The site comprises a substantial area of previously developed land in a sustainable location which benefits from excellent access to the town centre and train station. The potential of the site is recognised by its allocation by policy CR12a. However, elements of this allocation, and the evidence base which informed it, are now dated and it is appropriate to consider alternative forms of development to meet the needs of RBC in this location. The alternative configuration outlined within this submission seeks to enhance the contribution the site can make in this regard, by making an effective and efficient use of sustainable brownfield land, which is supported by the NPPF 2022.

Please note in relation to the answer to question 8 part 3 as to whether the owner supports the proposal, we would like to add that it is understood that Reading Borough Council support the principle of the redevelopment of the site.

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : cattle market-22.11.2022.PDF



Title: Cattle Market

Asset no:

Date: 22/11/2022

Scale at A4: 1:1250

Produced by Assets Management

Ref: 54008\SP-DEGNS-AM-jeanjea-mapinfo2-806b1.wor

CR13c: Forbury Business Park and Kenavon Drive

Reading Local Plan Review (May 2023) – Call for Sites Form (to complete online)

Your Details

Name

Phillip Brown

Organisation (if applicable)

Savills

On behalf of

If an agent or representing another person.

Viridis Real Estate Services Limited

Telephone

44 0 118 520506

Email address

PBrown@savills.com

Site Details

Site address

Please include postcode, if known.

Land at 38 – 41 Kenavon Drive, Reading, RG1 3DH

Are you the owner:

No

Who is the owner:

Viridis Real Estate Services Limited

Do the owners, or other part owners, support your proposal?:

Yes

Are there any legal agreements that would be important:

No

What is the size of the site in hectares:

1.1 Ha

What is the current land use of the site:

Please see covering letter

What is the proposed land use of the site:

If residential, please suggest how many dwelling the site could accommodate.

Please see covering letter

Has there been any recent market interest in the proposed use of the site?

Yes

Please provide further details of the recent market interest

Approaches by developers interested in purchasing the site

What is the likely timescale of the site becoming available during the plan period:

For example, 1-5 years, 6-10 years, 11-15 years.

1-5 years

Is the site already allocation in a development plan?

Yes

If yes, and the proposed use is different, why do you consider that the allocation should be changed?

Please refer to covering letter.

Please give any other information that you consider relevant to enable assessment of the candidate site

For example, constraints, contextual information, history of the site including current and past planning applications (with reference numbers where available).

Please refer to covering letter.

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red.

Please note that this is essential, as sites cannot be considered without clarity about the boundaries.

07 June 2023

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

Sent via email only to: planningpolicy@reading.gov.uk

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Reading RG1 8BW
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Dear Sir / Madam,

READING BOROUGH LOCAL PLAN REVIEW: CALL FOR SITES – Land at 38 – 41 Kenavon Drive, Reading

We write on behalf of Viridis Real Estate in response to the current 'Call for Sites' which Reading Borough Council RBC is undertaking to inform the Local Plan Review LPR. Viridis are the owners of land at Kenavon Drive, Reading, RG1 3DH the Site.

Together with the information provided herein, this submission to the Call for Sites is accompanied by:

- A completed Call for Sites Form completed online and
- Existing Site Plan.

The Site is currently allocated in the adopted Reading Local Plan 201 Policy CR13c for residential development. However, the CR13c allocation underestimates the capacity of the site, as confirmed by pre-application discussions with Reading Borough Council since the adoption of the Local Plan, the outcomes of which are explained in this letter. Accordingly, and further to the recent pre-application discussions, we write to affirm that the Site is available for development and represents a suitable and sustainable location for residential use and to provide confirmation of its site capacity.

In this context, this response to the Call for Sites is structured as follows:

- **Site Context:** describing the key characteristics of the Site and surrounding area
- **Policy Context:** explaining the adopted and emerging policy context for the Site
- **Site Assessment:** providing a summary of the suitability, availability and achievability of the Site to accommodate residential development
- **Development Potential:** describing the potential of the Site to accommodate residential development and
- **Summary:** providing an overall summary of these representations.

Site Context

Land at Kenavon Drive is in a highly sustainable location on the edge of the town centre in Central Reading as defined in the adopted Local Plan 201. The site is located within close proximity of key local services and facilities within the town centre and Reading railway station located less than 1km to the west.

Since the adoption of the Local Plan the development of the southern part of the CR13b site directly to the south has commenced, with Berkeley Homes providing some 76 new homes as part of their Huntley Wharf scheme.

On 24 February 2023, following a public consultation event, a request for an Environmental Impact Assessment Scoping Opinion was made to Reading Borough Council reference number 230243 in relation to the proposed redevelopment of the Forbury Retail Park northern part of Site CR13b with a residential led scheme comprising up to 820 units and up to 5,500 sq m of commercial uses within buildings of up to 12 storeys in height. The Council's Scoping Opinion was issued on 18 April 2023.

The CR13d site to the east has also now received planning permission with demolition of the Gas Holders that occupied the site having now been demolished.

The Site itself totals approximately 2.05 hectares and is bound by the Paddington mainline to the north, residential development to the east, Kenavon Drive from which the site accessed and Huntley Wharf to the south and the Forbury Retail Park to the west. The Site is primarily located within Flood Zone 1. The Site is also within an Air Quality Management Zone which covers the entirety of central Reading.

The Site presents an exciting opportunity for Reading Borough, as well as Viridis, to deliver a scheme of Build to Rent units that meets market demand, helps to address local market and affordable housing needs and which will make a positive and lasting contribution to Reading town centre from both a social, environmental, and economic perspective.

Policy Context

Local Plan Policy CR14g

The Site is currently allocated in the adopted Reading Local Plan 2011 Policy CR13c, which confirms that it would be largely residential in nature, with opportunities for the creation of an area of open space close to the Kennet. The Policy states that development will link into the newly opened pedestrian link under the railway to Napier Road. The indicative potential for the site is stated to be 100 – 285 new dwellings.

Following the allocation of the site in the Adopted Local Plan, Viridis commenced the pre-application engagement process with the Borough Council in February 2020, leading to a Design Review Panel in April 2021. The discussions with the Council's Planning Officers and the Design review process has confirmed that the Site has the potential to deliver in the order of 430 – 450 open market and affordable Build to Rent BTR units, new commercial floorspace, private open space, public open space and new public realm, all arranged around a pedestrian and cycle route through to the railway underpass. The new BTR units would be arranged in 4 blocks of development ranging from 4 to 12 storeys in height.

On this basis, the conclusion of the Council's Review of the Reading Borough Local Plan 2019 (March 2023) that Policy CR13 should be subject to update is welcomed. The reasons given at paragraph 3.782 of the Review of the Reading Borough Local Plan document for updating the Policy are:

- *Changes to the circumstances on individual sites, including the progress of development; and*
- *Potential impacts of changing national policy, including on matters such as increasing densities in town centres.*

Viridis agree with both of these reasons as discussed in the remainder of this submission. Accordingly, and further to recent pre-application discussions with RBC, we write to affirm that the Site is available for development and represents a suitable and sustainable location for residential use.

We support the intention to review Policy CR14g, based on the above, and set out further below the alternative use that should be considered at the Site.

Other adopted Local Plan policies

In addition to Policy CR14g, a number of other adopted Local Plan policies are relevant to informing development proposals at the Site, including the following policies, which are also identified in the 'Review of

the Reading Borough Local Plan 2019' (March 2023) as requiring updating as part of the current Local Plan Review:

- Policy H1: Housing Provision
- Policy H2: Density and Mix
- Policy H3: Affordable Housing
- Policy H4: Build to Rent Schemes
- Policy RL2: Scale and Location of Retail, Leisure and Culture Development
- Policy CR2: Design in Central Reading
- Policy CR6: Living in Central Reading
- Policy EM1: Provision of employment development
- Policy EM2: Location of employment development

The commitment to review the above adopted Local Plan policies is supported, in order to take into account recent changes to national planning policy, market conditions and local characteristics. In addition to Policy CR13c, we welcome the commitment to review Policies H1 Housing provision based on the acknowledgement of increasing housing needs in the context also of the 35% urban uplift applied to Reading Borough and the need for additional housing land availability. As set out below, it is considered that the Site has significant potential to help contribute to addressing these needs, beyond the scale of development currently proposed by Adopted Local Plan Policy CR13c.

In addition, Policy CR10: Tall Buildings is also relevant to informing development proposals at the Site. At present, it limits the ability of Reading to meet its future housing needs as it acts as a barrier to achieving higher densities of development outside of the designated locations for tall buildings. With limited brownfield land available within the urban area of Reading, opportunities must be taken to optimise the contribution that all previously developed sites make and to achieve this a comprehensive review of the current, dated, tall buildings policy is essential. The review should see tall buildings as an opportunity rather than a threat, with positive encouragement given for well-designed tall buildings that respond positively to their surroundings. It is requested therefore that Policy CR10 is reviewed as part of the Local Plan Review, having regard to increasing housing needs of the Borough and changes to local characteristics:

Site Assessment

The Planning Practice Guidance PPG states that, *'Plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next five years, or developable over a longer period'* Paragraph: 017 Reference ID: 3-017-201 0722 .

Accordingly, below we provide a summary of the suitability, availability and achievability including economic viability of the Site to accommodate proposed residential development.

Suitability

The adopted Local Plan emphasises the 'pressing need' for housing (paragraph 4.4.1) and identifies that around half of the Borough's housing provision will be developed in Central Reading (paragraph 3.2.4). As part of this Local Plan Policy H4 specifically supports Build to Rent schemes which meet set criteria. The housing needs of the Borough have subsequently increased, as referred to in the Council's 'Review of the Reading Borough Local Plan 2019' (March 2023) and will need to seek to be addressed in the Local Plan Review.

The Site is largely vacant and cleared of the majority of buildings and is therefore available for redevelopment. Owing to the highly sustainable location of the Site in Central Reading, close to local services and sustainable transport provision, the Site is well-placed to accommodate a new residential Build to Rent development, to support increasing local housing needs. The Site also has potential to accommodate flexible commercial uses as required to meet local needs, together with landscaping, amenity space and parking.

The Site is not subject to any statutory designations and there is a low risk of flooding and no known drainage constraints.

The site is therefore suitable for residential development given there are no constraints or other technical reasons affecting delivery of the site.

Availability and Achievability

The Government places significant emphasis in the National Planning Policy Framework 2021 on ensuring the timely and viable delivery of a sufficient supply of homes.

Land at Kenavon Drive comprises brownfield land under the sole control of Viridis and is available for development now. Furthermore, there are no significant legal constraints or infrastructure requirements associated with bringing the Site forward for development.

The Site is therefore available to achieve the delivery of a high-quality development now.

Development Potential

The Site has been identified for development within the adopted Local Plan 201 Policy CR13c – albeit for a lesser number of residential units than could be accommodated, as confirmed by pre-application discussions with Reading Borough Council and explained above.

The Site presents an excellent opportunity to provide approximately 430 - 450 Build to Rent residential units to help support increasing local housing needs in the centre of Reading, together with flexible commercial and/or community uses as required, landscaping, amenity space and parking. The proposals seek to incorporate on-site affordable housing and a mix of unit sizes including studios and 1, 2 and 3-beds as well as townhouses. The Site would provide a medium to high density of development appropriate to its edge of town centre location, maximising the efficient use of a brownfield site and taking into account the context provided by other new and proposed developments in the immediate vicinity.

The ground floor provides an opportunity to accommodate flexible commercial and/or community uses as required. Well considered and highly useable external amenity space is proposed at podium level together with internal amenity areas and balconies. Provision is made for carparking, disabled car parking including electric vehicle charging points and high-quality cycle parking at a level that reflects the proximity of the site to Reading town centre and reading station.

As referred to above, there are no significant constraints or infrastructure requirements affecting the deliverability of the Site. As such, there are no reasons which would prevent the Site from delivering a high-quality development at the scale proposed, in a timely manner.

Summary

Land at Kenavon Drive is suitable, available and achievable for the delivery of proposed residential development, specifically some 430 – 450 Built to Rent units.

In terms of suitability, the Site is in a highly sustainable location and is not subject to any restrictive designations or significant constraints. Accordingly, the proposed high-quality residential development, which meets local needs, and respects local character, is the right solution for the site.

In terms of availability and achievability, the Site is in single ownership by Viridis and is not subject to any significant legal or policy constraints or infrastructure requirements and is available for the delivery of development now.

The Site has potential to accommodate a Build to Rent residential development of high-quality. Such a scheme would support local housing needs, delivering market and affordable Build to Rent units together with open

space and provision of commercial floorspace if required. This makes the Site a unique proposition for Reading, which should be capitalised on through the comprehensive review of Policy CR13c and other related policies and strategies in the adopted Local Plan.

Considering the above, we request that the Local Plan Review supports the development potential of the Site to accommodate residential use, specifically some 430 – 450 new Build to Rent units.

Please do not hesitate to contact me if you have any questions regarding these representations or require any further information.

Yours sincerely

A handwritten signature in black ink, appearing to read "Philip Brown", with a stylized, flowing script.

Philip Brown BA (Hons) MRTPI
Director Planning

Enc. Call for Sites Form completed online
Existing Site Plan

Land at 38 – 41 Kenavon Drive | Viridis Real Estate



CR14g: The Oracle Riverside East

31 January 2024
Delivered by email

Planning Policy Team
Reading Borough Council
Civic Offices
Reading
RG1 2LU

planningpolicy@reading.gov.uk

Dear Sir / Madam

READING LOCAL PLAN PARTIAL UPDATE – CONSULTATION ON SCOPE AND CONTENT (UNDER REG.18)

We are pleased to submit representations on behalf of our client, The Oracle Limited Partnership (OLP), to the ongoing consultation on the Reading Local Plan Partial Update to outline the potential for residential-led mixed use development of part of land at the Oracle.

A plan showing The Oracle Limited Partnership land interest is enclosed in **Appendix 1**.

THE SITE

The Oracle Limited Partnership are the owners and asset managers of the Oracle, Reading and are responsible for the ongoing management and operation of The Oracle, as well as securing its long-term vitality and viability of operations in the heart of Reading Town Centre.

The Council will be aware of the existing, live, planning applications that seek to redevelop and regenerate existing areas of The Oracle as a means to maintain the pivotal role it plays in the fabric of Reading Town Centre as an economic, social, and cultural hub situated on the River Thames:

- **Ref. 221916 - Former Debenhams Department Store:** *"Mixed use development comprising part demolition of former department store and erection of new building comprising build to rent residential use (Class C3) and commercial uses within Uses Class E and / or bar (Sui Generis Use). Reconfiguration and change of use of remaining department store floorspace (Class E) to uses with within Use Class E and / or bar (Sui Generis Use) and / or experiential leisure use (Sui Generis Use). Associated public realm, infrastructure works and external alterations to shopping centre, including creation of new shopping centre entrance."*
- **Ref. 221917 - Existing Vue Cinema Complex:** *"Mixed use development comprising demolition of existing buildings and erection of new building comprising build-to-rent residential use (Class C3), cinema (Sui Generis) and ground floor commercial uses within Use Class E and /or Bar (Sui Generis Use). Associated public realm and infrastructure works".*

The Pinnacle
20 Tudor Road
Reading
RG1 1NH
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In addition, works are due to commence shortly on the sub-division of the former House of Fraser department store in the centre, creating 3 new retail and leisure units within the centre, ensuring the Oracle remains a regional retail and leisure destination in the Thames Valley.

The rationale and technical justification behind these development proposals are contained within the supporting documentation alongside each respective application and are not repeated here. However, it is important to emphasise the context in which these applications are made, in light of the evolution of town centres, the role they play and the pivotal role of The Oracle in the Reading economy and its draw for the southeast for Reading as a regional centre.

POLICY MATTERS

The following section of these representations pay regard to policy matters and respective questions as currently drafted within the Reg. 18 Consultation document.

Q58: Do you agree that we should update policy CR6 to seek a greater contribution towards family housing?

Policy CR6 (Provision of Family Housing) seeks to raise the requirement to provide 3 bed properties from the existing 5% provision to a minimum of 10-15% provision, unless it is clearly demonstrated that this would render the development unviable. OLP has significant concerns with this blanket approach to the mix of new homes across the Borough, in particular within the town centre. As demonstrated through recent planning permissions and market interest within central Reading (including additional policy rationale for co-living uses), there remains significant demand in the central area, particularly for Build-to-Rent schemes, of studio, 1 bed, and 2 bed properties. Should the Council have evidence to the contrary, identifying significant increase in demand for 3+ bed dwellings in the centre area, then this should form part of the Local Plan Review evidence base, and be available for scrutiny by stakeholders.

OLP have received advice from market agents and BtR providers, who have advised that the predominant market demand for central Reading remains with 1 and 2 bed units, with there being significant uptake for these units within developments and limited vacancy rate. The market for 3 bed units is identified as being more limited.

It is acknowledged that central Reading is expected to undergo significant change in order to meet housing needs, with the allocation of additional town-centre sites. With additional complexities and costs in delivering brownfield land, there is limited commercial return on developing additional 3-bed properties, where demand is identified as being low. The rental values per sqm for 3 bed units are lower than 1 and 2 bed properties, despite costs remaining the same. Thus, to increase the requirement for a greater mix of 3 bed properties contrary to market requirements, could jeopardise the viability and therefore deliverability, of schemes and have knock on effects in terms of the ability to deliver affordable housing.

The Council's aspiration to deliver more family housing is acknowledged and it suggested that alternative options such as protecting the existing family housing stock in the town are more likely to deliver the desired outcome. The aspiration for more families in the central area should also be balanced through the proposed spatial strategy by ensuring the timely delivery of essential supporting infrastructure within the central area to accommodate and encourage the proposed growth of families in this location in the Borough.

As outlined above, it is considered where the provision of 3-bed flats within town centre development is pursued, the development inherently becomes less profitable. As such, less additional value would arise from the development to subsidise affordable housing (either on-site or off site contribution). We therefore consider that there should not be a requirement for increased provision of 3-bed units in Reading Town Centre above existing policy levels, with a clear link to development viability in assessing the level of 3-bed units to be provided.

Q33: Do you agree with the inclusion of a requirement for a deferred contribution in policy H3?

The existing policy delegates the specific tenures of affordable housing sought through a Supplementary Planning Document. The current Affordable Housing SPD was adopted in March 2021, which set tenure expectations as follows:

- Affordable rented accommodation at 'Reading affordable rent' levels – at least 62% of the affordable housing to be provided; and
- Affordable home ownership (shared ownership or another product) – maximum 38%.

It is acknowledged that the expectation is that all affordable homes for rent secured through on-site provision on developments will be let at 'Reading affordable rent' levels, or lower. 'Reading affordable rent' is defined as rental levels capped at 70% of market rates.

It is proposed that the updated policy H3 incorporate the expected affordable housing tenures, with the Council's starting point continuing to seek at least 62% of provision at Reading affordable rent levels.

The Planning Practice Guidance acknowledges that for Build to Rent Development (Paragraph: 002 Reference ID: 60-002-20180913) that "20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme ... National affordable housing policy also requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents. The discount should be calculated when a discounted home is rented out".

As set out above, national practice guidance suggests a minimum 20% deduction, while the Reading affordable rent is set at 70% of market levels, representing a 50% increase in the rental deduction. Whilst it is recognised that the national guidance is a minimum amount of rent discount, there is concern that requiring a 50% greater discount to be applied to properties in Reading will in fact result in substantially lower quantum of affordable housing delivery or make it so any build to rent scheme is no longer commercially viable, hence not deliverable. As being demonstrated across residential schemes in Central Reading, viability is challenging with limited development surplus to deliver affordable housing. If a greater discount is applied to market rents, then each affordable unit will be worth less in the development appraisal and will result in a lower quantum of affordable houses being provided within a scheme, compared to a 20% deduction against market rates.

The Council in Policy H3 is also proposing a deferred contribution mechanism in circumstances where a reduced affordable provision has been accepted. This mechanism would allow from RBC to re-visit the provision at certain times through the construction, to review whether in the event of a change in market conditions that makes a greater contribution viable. It is recognised that RBC have been actively adopting this approach already, however, incorporating the mechanism into policy will give it greater weight. Our client does have concerns about the incorporation of a deferred mechanism as it adds uncertainty into future costs of development, which can make investment decisions challenging.

Should it be determined to incorporate this deferred contribution mechanism into policy, then it is applied consistently across all development proposals with clear guidance and a transparent process adopted so that it can be appropriately factored into development appraisals. This guidance should be published for consultation prior to adoption, with views sought from stakeholders and viability consultants. In addition to the mechanism allowing for RBC to seek a greater level of contribution should market conditions allow, it is essential the mechanism also enables applicants to seek a reduced level of contribution should a change in market conditions dictate that the previously agreed contribution is no longer viable.

Q35: Do you agree with the proposed update to policy H4 around rolling tenancies forward?

Policy H4 proposes to incorporate a clause requiring that a further three-year tenancy period should generally be offered at the end of the tenancy which would be secured through a Section 106 legal agreement. OLP, based on advice on BtR providers and market agents, do not have an in principle concern with this addition to the policy, highlighting that generally, BtR buildings are owned as a long term investment with a commercial investment on maintaining high levels of occupancy and limited vacancies. It has become industry standard, to offer a mix of three-year and five-year leases but it does need to ensure that any policy requirement for roll-over tenancies does not seek to influence or control rental levels during any tenancy roll extension. This is a matter which falls out with the planning policy remit and should be governed by the market.

Q49: ARE YOU AWARE OF ANYTHING ELSE THAT SHOULD BE FACTORED INTO AN UPDATE TO POLICY RL2?

The Council are proposing to update Policy RL2 (Scale and Location of retail, leisure and cultural development) to take into account updated retail, leisure and cultural needs assessments. The current policy identifies a need for up to 35,000 sqm of retail and related floorspace by 2036. Given the structural changes in the retail and town centre sector over recent years and the evolving nature of town centres, this requirement is clearly not representative of current occupier and consumer demand for retail space. To ensure any updated policy is reflective of current market conditions, OLP consider there is a need for updated assessments to inform an update to Policy RL2 on the quantitative and qualitative requirement for additional town centre floorspace. It should be ensured that any parties undertaking such assessments on behalf of RBC engage appropriately with key stakeholders in Reading Town Centre, such as OLP, and that any documents are published for comment and/or scrutiny at appropriate milestones. This will ensure that any additional assessment used to inform policy and evidence-base, be sufficiently tested by stakeholders.

Q59: DO YOU AGREE THAT WE SHOULD UPDATE POLICY CR7 AS DESCRIBED TO REFLECT CHANGES IN USE CLASSES?

Policy CR7 (Primary Frontages) aims to ensure that the main shopping frontages across Central Reading provide active uses with a shopfront, and that a proportion of retail or financial and professional use is retained within each frontage. Parts of The Oracle are designated within the adopted Local Plan as primary frontages. The draft Plan Partial Update Review seeks to remove the restriction on the number of 'non-shop' uses in the frontage and enable greater flexibility for town centre uses. This is considered to be a positive amendment and seeks to aligns policy with the 2020 amendments to the Use Classes Order through the introduction of Use Class E.

We are in support of this suggested change given the need for town centres to remain flexible and not be stymied by out of date restrictions. This will enable OLP appropriate flexible in line with national planning legislation to curate their tenant line up throughout the centre in respond to changing tenant demands, operator failure and market requirements. This will have a positive impact upon the vitality and viability of Reading Town Centre.

OTHER MATTERS

The draft Plan Partial Update Review also identifies a number of locations in the Central Area which could accommodate new development (including residential uses). It is noted that the Oracle is not currently identified as such a location, despite there being clear market and developer interest in this location, as exemplified through the submission of two live planning applications. OLP have engaged extensively with Council Executive Officers, Planning Officers, Elected Members and the community for over 2 years regarding the diversification of the shopping centre offer, to create a high quality residential community in the heart of the town centre. The Oracle area provides significant potential to accommodate a range of uses, including residential, through densification of development and repurposing of commercial floorspace, whilst retaining its primary function as a destination space in the southeast region. It is therefore requested that the Oracle area (identified at Appendix 1) is also recognised as a key

opportunity site within the Local Plan Partial Update that can suitably and demonstrably accommodate sustainable development, including residential uses.

Should further information be required as to the capability and capacity of the Oracle opportunity area we would be happy to provide, but would refer Officers to the information provided through planning applications ref. 221916 and 221917 as a starting point.

More generally, in respect of the spatial strategy we note, the Local Plan Partial Update makes clear that Reading Borough Council is currently reviewing its approach to housing targets in consideration of the 35% uplift for the top 20 highest population urban areas (Paragraph 2.7 of the LPPU). This work remains ongoing and is unpublished at the time of consultation, so Reading's housing needs remain unclear and we reserve right to make further comment on any requirements as this information becomes available. If there is an identified requirement for additional housing, we consider that the central area offers significant potential to accommodate housing growth, providing opportunity for sustainable and accessible residential communities contributing to the vitality and viability of the town centre. It should be ensured that other policies within the Local Plan are aligned to ensure that higher density residential development is supported.

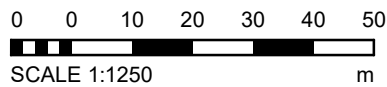
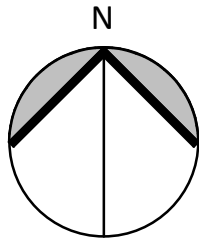
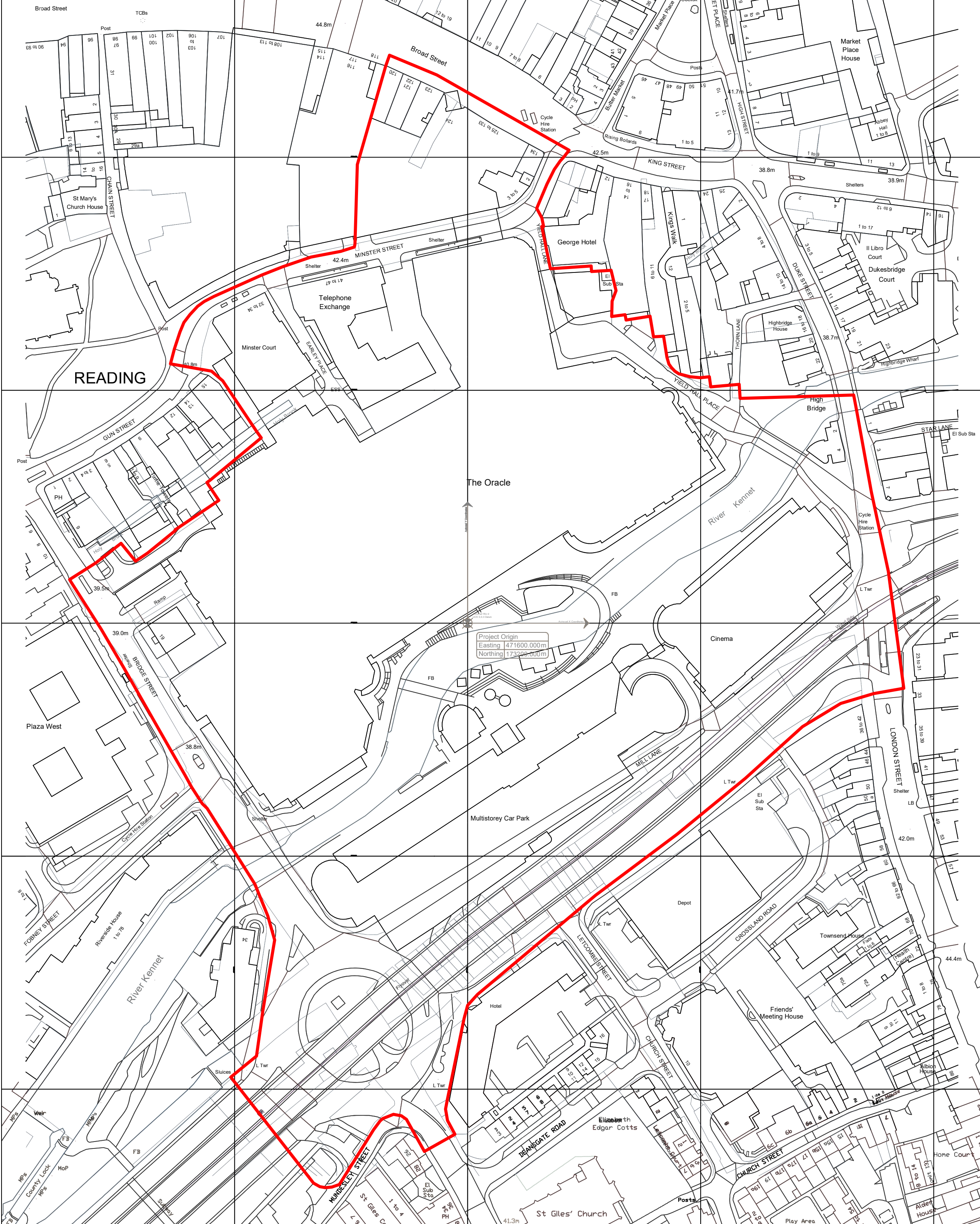
Summary

I would be grateful if you would provide acknowledgment of receipt of these representations and would keep us informed of the progress on the emerging Local Plan Partial Update. We would welcome the opportunity to meet with Policy Officers to further discuss the opportunity presented by The Oracle as a mixed use opportunity area allocation and bringing forward development early within the Plan period.

In the meantime, should you have any queries with regard to the above, please do not hesitate to contact myself, or my colleague Cat White (Cat.White@turley.co.uk)

Yours sincerely

Peter Davis
Senior Planner
Peter.Davis@turley.co.uk



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APPLICATION BOUNDARY

REV	DATE	DESCRIPTION	DRN	CHK
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KEY PLAN

PROJECT

The Oracle

Reading, UK

CLIENT

Hammerson
Kings Place,
90 York Way,
London N1 9GE

ARCHITECT

CALLISONRTKL™

CallisonRTKL Ltd.
Blackbull Yard,
18 - 22 Hatton Wall, London, EC1N 8JH
CONTACT - Michael Dillon
PHONE - 020 7304 3520

SHEET IDENTIFICATION

TITLE

DEPARTMENT STORE
SUB-DIVISION APPLICATION -
REDLINE PLAN

PLANNING SUBMISSION

PROJECT NUMBER	SCALE @ A2: 1 : 1250
SUITABILITY CODE	DATE DRAWN: 05/12/23
REVISION	DRAWN BY: US
	CHECKED BY: TP

PROJECT	ORIGIN	ZONE	LEVEL	TYPE	ROLE	NUMBER
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TOR - CRL - ZZ - ZZ - DR - AR - 0100005

CR14r: John Lewis, Mill Lane

Your reference number is FS-Case-522240911.

Thank you for submitting Call for sites form (development)

Name: Jonathan Sebbage

Organisation (if applicable): Savills

On behalf of: John Lewis Partnership

Telephone: 07976910531

Email address: jon.sebbage@savills.com

Site address: Mill Lane, Reading, RG1 2HT

Are you the owner: No

Who is the owner?: John Lewis Partnership

Do the owners, or other part owners, support your proposal?: Yes

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: No

What is the size of the site in hectares?: 0.37

What is the current land use of the site?: The site currently comprises the existing John Lewis Partnership (JLP) warehouse building with associated car parking areas to the north-east and south-west of the building. However, the use of the existing building has become surplus to JLP's requirements, with its functions having been transferred to the John Lewis department store at Broad Street, Reading or to its Distribution Centre in Bracknell.

What is the proposed land use of the site?: Residential use (C3) together with flexible commercial and/or community uses as required, landscaping, amenity space and parking. It is currently anticipated that approximately 200 units (Build to Rent), including affordable housing, could be accommodated, comprising a mix of studios, 1, 2 and 3-bed units.

Has there been any recent market interest in the proposed use of the site?: Yes

Please provide further details of the recent market interest: JLP has partnered with ABRDN to progress development proposals at the site.

What is the likely timescale of the site becoming available during the plan period?: 1-5 years

Is the site already allocated in a development plan?: Yes

If yes, and the proposed use is different, why do you consider that the allocation should be changed?:

Please refer to covering letter - sent separately via email to planningpolicy@reading.gov.uk

Please give any other information that you consider relevant to enable assessment of the candidate site:

Please refer to covering letter - sent separately via email to planningpolicy@reading.gov.uk

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : (00)_020

Existing Site Plan.pdf

7 June 2023

The Savills logo, featuring the word "savills" in a red, lowercase, sans-serif font, positioned within a yellow rectangular background.

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Sent via email only to: planningpolicy@reading.gov.uk

Dear Sir / Madam,

READING BOROUGH LOCAL PLAN REVIEW: CALL FOR SITES – MILL LANE, READING

We write on behalf of John Lewis Partnership in response to the current 'Call for Sites' which Reading Borough Council (RBC) is undertaking to inform the Local Plan Review (LPR). John Lewis Partnership are the owners of land at Mill Lane, Reading, RG1 2HT the Site.

Together with the information provided herein, this submission to the Call for Sites is accompanied by:

- A completed Call for Sites Form completed online and
- 00 020 SK1 Existing Site Plan.

The Site is currently allocated in the adopted Reading Local Plan 2011 Policy CR14g for public car parking to facilitate an additional 1,600-2,000sq m retail provision at The Oracle Shopping Centre opposite. However, the CR14g allocation is no longer deliverable for the reasons explained in this letter. Accordingly and further to recent pre-application discussions with RBC, we write to affirm that the Site is available for development and represents a suitable and sustainable location for residential use.

In this context, this response to the Call for Sites is structured as follows:

- Site Context: describing the key characteristics of the Site and surrounding area
- Policy Context: explaining the adopted and emerging policy context for the Site
- Site Assessment: providing a summary of the suitability, availability and achievability of the Site to accommodate residential development
- Development Potential: describing the potential of the Site to accommodate residential development and
- Summary: providing an overall summary of these representations.

Site Context

Land at Mill Lane is in a sustainable location on the edge of the town centre in Central Reading as defined in the adopted Local Plan 2011. The site is located within close proximity of key local services and facilities within the town centre including The Oracle shopping centre opposite, the Premier Inn hotel adjacent to the west and Reading railway station located approximately 1km to the north.

Land at The Oracle shopping centre, including the existing Vue cinema, multi-storey car park and former Debenhams store, is currently the subject of live planning applications refs. 221/16 and 221/17 for mixed-use redevelopment to provide up to 44 Build to Rent residential units and commercial uses. The Reading Central Club site, located adjacent to the east, is allocated for residential and community use in the adopted

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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Local Plan 201 Policy CR14h and is currently the subject of a live planning application ref. 221364 for redevelopment to provide 17 units.

The Site itself totals approximately 0.37 hectares and is bound by Mill Lane and the A32 to the north, Letcombe Street to the south-west and Crossland Road to the south-east, from which the Site is accessed. The Site is located within Flood Zone 1 and is outside, but adjacent to the edge of, the Market Place / London Street Conservation Area. The Site is also within an Air Quality Management Zone which covers the entirety of central Reading.

The Site currently comprises the existing JLP warehouse building with associated car parking areas to the north-east and south-west of the building. However, the use of the existing building has become surplus to JLP's requirements, with its functions having been transferred to the John Lewis department store at Broad Street, Reading or to its Distribution Centre in Bracknell. As a result, JLP are seeking to progress proposals for the redevelopment of the Site to accommodate one of its first flagship residential Build to Rent schemes. In this context the Site presents an exciting opportunity for Reading borough, as well as JLP, to deliver a scheme of Build to Rent units that meets market demand, helps to address local market and affordable housing needs and which will make a positive and lasting contribution to Reading town centre from both a social, environmental and economic perspective.

Policy Context

Local Plan Policy CR14g

The adopted Reading Local Plan 201 Policy CR14g identifies the Site for development, and allocates the Site, together with land opposite across the A32, for 1,600-2,000sq.m of retail or town centre uses 'between the River Kennet and Mill Lane' (i.e. The Oracle Shopping Centre and public car parking at Letcombe Street i.e. the Site). This allocation was carried forward from previous local planning policy which JLP were not involved in.

In light of recent major changes in the retail sector and reduced demand for additional retail floorspace and additional car parking the allocation has not been delivered as the Council previously envisaged. Indeed, Hammerson owners of The Oracle have previously confirmed to JLP that they do not have any intentions to implement the existing allocation for additional retail provision and that they do not therefore require the use of the Site for car parking. In any case, JLP would also not support the development of the Site for this purpose.

The recent planning applications refs. 221 16 and 221 17 submitted by Hammerson for proposed residential development at The Oracle shopping centre, noted above, include the existing Vue cinema and multi-storey car park which is part of the Local Plan allocation Policy CR14g for additional retail use. Notably, paragraph 7.2 of the submitted Planning Statement, accompanying planning application ref. 221 17, states:

*"It is recognised that the site at Yield Hall Place 2 is allocated within the adopted Local Plan under Policy CR14(g) (The Oracle Extension, Bridge Street and Letcombe Street) for approximately 1,600 – 2,000sq.m of retail and/or town centre uses. As set out previously the Applicant, as owner of the site, is seeking a rationalisation of existing retail offer within Reading as they have identified an oversupply of retail floorspace within the shopping centre due to structural changes in the retail market. As such, **there is not considered to be the need to provide additional retail floorspace at The Oracle as per the allocation under Policy CR14(g).** The allocation also incorporates the multistorey car park adjacent to the Yield Hall Place site. Hammerson recognise that this site may have development potential over the longer term, depending on the longer-term trends on car park usage and may seek to repurpose part of the site over a further plan period. The current proposals do not prejudice any future proposals for the multistorey car park in the longer term."*

It is clear therefore that Hammerson do not intend to provide any additional retail floorspace at The Oracle nor based on this any car parking at the Site, as envisaged by Policy CR14g, and therefore the site allocation is clearly not deliverable.

The Council's own recent 'Review of the Reading Borough Local Plan 2019' (March 2023), undertaken to inform the current Local Plan Review, similarly states: *"it is likely that landowner intentions have changed regarding CR14g, the Oracle extension, as evidenced by recent applications for the centre, and is no longer expected to entail a retail extension in this location. This allocation is therefore unlikely to be deliverable and requires review"* paragraph 3.7 4 .

On this basis, Paragraph 3.7 7 concludes that, *"Policy CR14 should be subject to update due to:*

- *The need to remove sites where development has completed or is underway;*
- *The need to amend site allocations in line with what has been permitted on site;*
- *The need to amend site allocations to ensure that they are deliverable; and*
- *The potential need to identify further sites or amend allocations to help to meet housing needs."*

We support the intention to review Policy CR14g, based on the above, and set out further below the alternative use that should be considered at the Site.

Other adopted Local Plan policies

In addition to Policy CR14g, a number of other adopted Local Plan policies are relevant to informing development proposals at the Site, including the following policies, which are also identified in the 'Review of the Reading Borough Local Plan 2019' (March 2023) as requiring updating as part of the current Local Plan Review:

- Policy H1: Housing Provision
- Policy H2: Density and Mix
- Policy H3: Affordable Housing
- Policy H4: Build to Rent Schemes
- Policy RL2: Scale and Location of Retail, Leisure and Culture Development
- Policy CR2: Design in Central Reading
- Policy CR6: Living in Central Reading
- Policy EM1: Provision of employment development
- Policy EM2: Location of employment development

The commitment to review the above adopted Local Plan policies is supported, in order to take into account recent changes to national planning policy, market conditions and local characteristics. In particular, in addition to Policy CR14g, we welcome the commitment to review Policies H1 Housing provision and EM2 Location of employment development based on the acknowledgement of increasing housing needs and the need for additional housing land availability. As set out below, it is considered that the Site has significant potential to help contribute to addressing these needs.

In addition, the following adopted Local Plan Policies are also relevant to informing development proposals at the Site. We would request that these policies are also reviewed as part of the Local Plan Review, having regard to increasing housing needs and changes to local characteristics:

- Policy CR10: Tall Buildings
- Policy EM3: Loss of employment land

Adopted Local Plan Policy CR10 in particular limits the ability of Reading to meet its future housing needs as it acts as a barrier to achieving higher densities of development outside of the designated locations for tall buildings. With limited brownfield land available within the urban area of Reading, opportunities must be taken to optimise the contribution that all previously developed sites make and to achieve this a comprehensive review of the current, dated, tall buildings policy is essential. The review should see tall buildings as an opportunity rather than a threat, with positive encouragement given for well-designed tall buildings that respond positively to their surroundings.

Site Assessment

The Planning Practice Guidance (PPG) states that, *'Plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next five years, or developable over a longer period'* Paragraph: 017 Reference ID: 3-017-201 0722 .

Accordingly, below we provide a summary of the suitability, availability and achievability including economic viability of the Site to accommodate proposed residential development.

Suitability

The adopted Local Plan emphasises the 'pressing need' for housing (paragraph 4.4.1) and identifies that around half of the borough's housing provision will be developed in Central Reading paragraph 3.2.4 . As part of this Local Plan Policy H4 specifically supports Build to Rent schemes which meet set criteria. The housing needs of the borough have substantially increased, as referred to in the Council's 'Review of the Reading Borough Local Plan 2019' (March 2023), and will need to be addressed in the Local Plan Review.

As set out above, the use of the existing warehouse building at the Site has become surplus to JLP's requirements, with its functions having been transferred to the John Lewis department store at Broad Street, Reading or to its Distribution Centre in Bracknell. The Site is therefore available for redevelopment. Owing to the highly sustainable location of the Site in Central Reading, close to local services and sustainable transport provision, the Site is well-placed to accommodate a new residential Build to Rent development, to support increasing local housing needs. The Site also has potential to accommodate flexible commercial and/or community uses as required to meet local needs, together with landscaping, amenity space and parking.

The Site is not subject to any statutory designations and there is a low risk of flooding and no known drainage constraints.

The site is therefore suitable for residential development given there are no constraints or other technical reasons affecting delivery of the site.

Availability and Achievability

The Government places significant emphasis in the National Planning Policy Framework 2021 on ensuring the timely and viable delivery of a sufficient supply of homes.

Land at Mill Lane comprises brownfield land under the sole control of JLP and is available for development now. Furthermore, there are no significant constraints or infrastructure requirements associated with bringing the Site forward for development. There are therefore anticipated to be no abnormal costs that need to be overcome in developing the Site.

The Site is therefore available to achieve the delivery of a high-quality development now.

Development Potential

The Site has been identified for development within the adopted Local Plan 2019 Policy CR14g – albeit for an alternative use which is not deliverable, as explained above.

The Site presents an excellent opportunity to provide approximately 200 Build to Rent residential units to help support increasing local housing needs in the centre of Reading, together with flexible commercial and/or community uses as required, landscaping, amenity space and parking. The proposals seek to incorporate on-site affordable housing and a mix of unit sizes including studios and 1, 2 and 3-beds. The Site would provide a medium to high density of development appropriate to its town centre location, maximising the efficient use of a brownfield site and taking into account the context provided by other new and proposed developments in

the town centre. With the Site being promoted by JLP, a high quality of development and tangible social benefits can be assured.

The ground floor provides a unique opportunity to accommodate flexible commercial and/or community uses as required. Well considered and highly useable external amenity space is proposed at a podium level at the rear of the site together with generous internal amenity areas and balconies. Having regard to the central sustainable location of the site, close to public transport provision and local facilities, and to encourage sustainable travel, disabled car parking provision is proposed only including electric vehicle charging points together with high quality cycle parking.

As referred to above, there are no significant constraints or infrastructure requirements affecting the viability and deliverability of the Site. As such, there are not anticipated to be any abnormal costs which would prevent the Site from delivering an exemplar development in a timely manner.

Summary

Land at Mill Lane is suitable, available and achievable for the delivery of proposed residential development, specifically JLP's first flagship Build to rent Scheme in the UK. As the site is being promoted by JLP the quality of development and associated social benefits can be assured.

In terms of suitability, the Site is in a highly sustainable location and is not subject to any restrictive designations or significant constraints. Accordingly the proposed high-quality residential development, which meets local needs, and respects local character, is the right solution for the site.

In terms of availability and achievability, the Site is in single ownership in control by JLP, is not subject to any significant constraints or infrastructure requirements and is available for the delivery of development now.

The Site has potential to accommodate a Build to Rent residential development of a high quality that reflects and embodies JLP's values. Such a scheme would support local housing needs, delivering market and affordable Build to Rent units together with open space and provision of community facilities. This makes the Site a unique proposition for Reading, which should be capitalised on through the comprehensive review of Policy CR14g and other related policies and strategies in the adopted Local Plan.

In light of the above, we request that the Local Plan Review supports the development potential of the Site to accommodate residential use, specifically approximately 200 new Build to Rent units.

Please do not hesitate to contact me if you have any questions regarding these representations or require any further information.

Yours faithfully



Jonathan Sebbage BSc (Hons) MSc MRTPI
Associate

Enc. Call for Sites Form completed online
 00 020 SK1 Existing Site Plan
 Pre-Application document June 2022 , prepared by Carey Jones Chapman Tolcher CJCT

CR14s: 20-22 Duke Street

Our Ref: 3216/JF/LT20240130

31st January 2024

Planning Policy Team
Reading Borough Council
Civic Offices
Reading
RG1 2LU

By email: planningpolicy@reading.gov.uk

MRPP
MARTIN ROBESON
PLANNING PRACTICE

Town Planning Consultants
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21 BUCKINGHAM STREET
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TELEPHONE: 020 7930 0007
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Dear Sir/Madam,

REPRESENTATIONS TO THE READING LOCAL PLAN PARTIAL UPDATE CONSULTATION ON SCOPE AND CONTENT (UNDER REGULATION 18) (NOVEMBER 2023)

On behalf of our client, Samuel Smith Old Brewery Tadcaster, we hereby submit representations to Reading Borough Council's Local Plan Partial Update Consultation on Scope and Content November 2023.

Although at the initial stages of preparation, the Scope and Content document generally describes how the Council expect to change each policy as part of the Local Plan Partial Update. We therefore set out below our considerations in response to various questions raised by the Council in respect of suggested policy changes.

Housing in the Central Reading Area

The Council have indicated various suggested changes in relation to existing policies for development within the Central Reading Area. We note for instance that at Q30 and Q56, the Council have indicated their intention to increase the requirement for family housing within the town centre from 5 to potentially 15 as part of Policy CR6. Whilst a need for family housing is not disputed, the Council need to be particularly mindful of the constraints that are often faced by town centre sites, in terms of heritage considerations and other design matters, with family units often unable to be achieved on smaller town centre sites in comparison to larger, undeveloped, out of town greenfield sites.

The Council acknowledges at paragraph 12.12 that the majority of housing delivery over the plan period will take place within the town centre. As set out above it will however be necessary to carefully balance matters to ensure sites will be delivered and are not being stymied due to onerous requirements imposed. For instance, whilst a policy compliant scheme of 15 family homes may be granted, this may then subsequently be difficult to deliver due to viability or other considerations. Thus, the development will not come forward and the site will not be contributing to delivering much needed housing. As set out above, such sites generally face constraints which add additional costs to delivery over and above development of greenfield sites and this needs to be borne in mind with any change to Policy CR6.

In response to Q56, it will also be necessary for any changes to Policy CR2 'Design in Central Reading' to take into account the likely conflicting priorities associated with developing sites within the town centre. Thus, in developing sites for housing there will be instances whereby optimising sites to ensure housing numbers can be achieved will need to take priority over other design considerations.

Additional Housing Site

In terms of the opportunities for housing within the town centre, our client owns the site at 20-22 Duke Street on which is located a former public house which has remained vacant for a significant number of years. The site is located adjacent to the river Kennett and is situated on a corner plot which is also adjacent to High Bridge. The surrounding area comprises residential, retail, leisure and office uses.

As part of the Scope and Content document, the Council have identified a number of sites which could be taken forward as allocations within the Local Plan. Whilst a number of these are located within the town centre, the site at 20-22 Duke Street also offers a site within the town centre which can provide additional housing units within a sustainable location.

The site could deliver circa 30 units which is not within the same scale as other sites which have been put forward with those sites nominated as achieving between 70 and 400 units. With this in mind, the site at Duke Street thus offers the potential to deliver much needed town centre housing but in the shorter term given the size of the site and the number of units to be delivered. Thus, with respect of Q68, the Duke Street site is identified as another additional allocation to be added to Policy CR14 'Other sites for development in Central Reading'.

Whilst not only contributing to housing numbers, the allocation of 20-22 Duke Street for housing also offers a number of other significant benefits, delivering high quality residential development in the town centre, within an extremely sustainable location and a mixed-use area whereby residential development is an appropriate use and whilst also providing the opportunity for improved pedestrian connectivity along the river. This will provide an enhancement to the character and appearance of the area and ensures that new housing development is making efficient use of scarce urban land.

Increased Housing Need

The Council in their Scope and Content document have put forward a requirement of 800 new homes per year. The Council's current requirement is 669 homes per year and thus there will be a significant uplift in the number of homes required. The Council identify that there needs to be an even stronger focus on Central Reading if they are going to deliver housing to meet needs paragraph 3.6, it is thus essential that other developable, deliverable sites are allocated for housing in order to meet these needs. It will be crucial to ensure that delivery of these housing numbers can take place on sustainable sites such as 20-22 Duke Street.

We trust that these representations will assist the Council in the continued preparation and development of the Local Plan Partial Update, and are willing to discuss the content of any of these representations.

Yours faithfully,



Jessica Ferguson
jessicaferguson@mrpp.co.uk

CR14t: Aquis House, 41-59 Forbury Road and CR14u: 33 Blagrove Street

From: [Alex Welby](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-521783982
Date: 06 June 2023 10:57:26
Attachments: [Reading 'Call for Sites' - Representation on behalf of Universities Superannuation Scheme.pdf](#)

Name: Alex Welby

Organisation (if applicable): Deloitte LLP

On behalf of: Universities Superannuation Scheme Ltd

Telephone: 02073035201

Email address: awelby@deloitte.co.uk

Site address: USS' assets comprise the adjoining sites Aquis House (RG1 1PL) and 33 Blagrove Street (RG1 1PW) located in central Reading ('the Site').

Are you the owner: Yes

Are you a freehold or leasehold owner?: Freehold

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: No

What is the size of the site in hectares?: 0.42

What is the current land use of the site?: Office and Car Parking

What is the proposed land use of the site?: Mixed use - comprising residential and office

Has there been any recent market interest in the proposed use of the site?: No

What is the likely timescale of the site becoming available during the plan period?: 6-10 years

Is the site already allocated in a development plan?: No

Please give any other information that you consider relevant to enable assessment of the candidate site: Please see attached letter of representation for information.

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : Reading 'Call for Sites' - Representation on behalf of Universities Superannuation Scheme.pdf

06 June 2023

Planning Policy
Reading Borough Council
Bridge Street
Reading
RG1 2LU

Dear Sir / Madam,

**Reading Local Plan Partial Update 'Call for Sites'
Representations on behalf of Universities Superannuation Scheme Ltd**

On behalf of our Client Universities Superannuation Scheme Ltd (USS), we are writing to respond to the 'Call for Sites' consultation published by Reading Borough Council, which is open for comments until 8 June 2023.

Background

USS' assets comprise the adjoining sites Aquis House (RG1 1PL) and 33 Blagrove Street (RG1 1PW) located in central Reading ('the Site'). USS, therefore, has an active interest in the formulation of planning policy at Reading Borough Council ('the Council') and welcomes the opportunity to respond to the Call for Sites consultation. The Council has requested that sites are put forward for consideration to be included in the updated Local Plan as an allocated development site.

USS would like to promote the Site through this Call for Sites consultation for consideration as a mixed-use development comprising residential and employment uses to be delivered within the medium term (approximately five to ten years).

The Site

The Site is located in central Reading, immediately south of Reading railway station. The site comprises of two office buildings and a car park to the rear of Aquis House.

The Site is located within a sustainable town centre location. It is well connected by public transport with Reading National Rail Station providing mainline services to London, the southwest of England and Wales. Notably, in 2022, the Elizabeth Line connection to Reading began service, further improving the rail infrastructure in immediate proximity to the Site.

Several local bus services run along the Site boundary. Although not yet completed, the Site also benefits from being located along the proposed Mass Rapid Transit route, as outlined in the adopted Local Plan policy TR2a.

As the sole owner, USS intends to bring forward the entire Site for mixed-use redevelopment. In order to maintain flexibility for future redevelopment, USS can separate the Site into 'Site A' (Aquis House & car park) and 'Site B' (33 Blagrove Street). It should be noted that significant areas of office floorspace within 33 Blagrove Street have been vacant for several years despite the ongoing marketing of the space; currently, the first, third and fourth floors are vacant. This is a result of a poor layout, lack of reception and amenity space. In addition, a number of occupants have confirmed their intention to vacate Aquis House within 18 months. There is currently a large supply of office space available in Reading and demand is subdued. In 2023, thus far, in Central Reading, there has not been a single office transaction greater than 5,000 sq ft.

The full extent of the Site is shown in the below site plan, Figure 1.

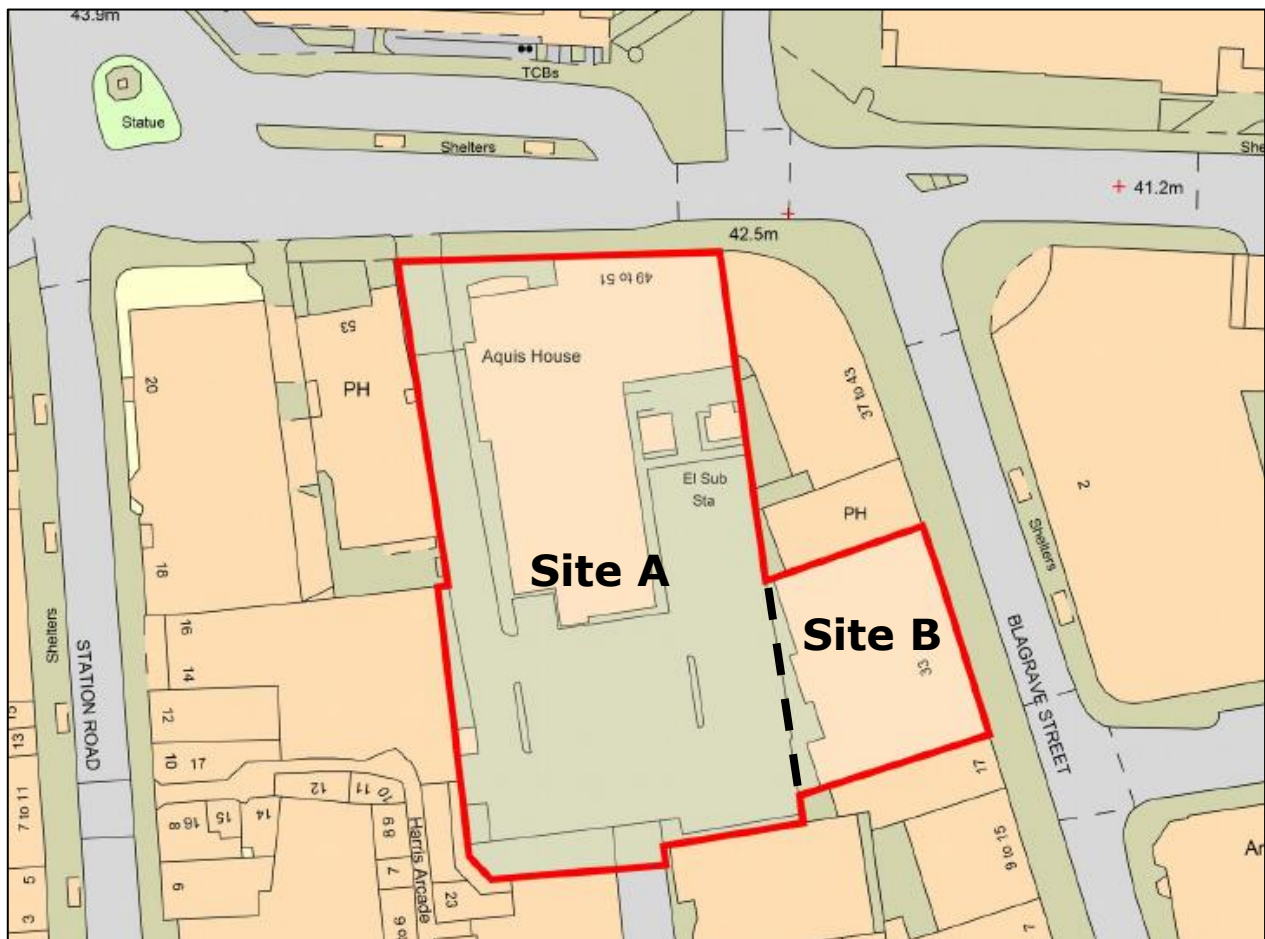


Figure 1: Site Location Plan. The plan demonstrates how the site can be split into Site A and Site B. Source: Promap.

Planning Policy Position

The Site is not currently allocated for redevelopment within the adopted Local Plan.

The Site is located within Central Reading and is required to adhere with Local Plan policies CR1 to 10. Additionally, the Site is located within the Central Core and Office Core, as identified by Local Plan policy CR1.

Site B is located within the Primary Shopping Area (policy CR1) and 'Reading Abbey Quarter', as identified by Local Plan policy CR15 which outlines this as a key area for heritage and cultural life. Furthermore, Site B is located within the Market Place/London Street Conservation Area.

Notably, land to the immediate north and west of the Site is allocated within the Station Area Tall Buildings Cluster (Local Plan policy CR10a). Additionally, land to the immediate north and west is identified within the Station/River Major Opportunity Area within policy CR11.

The Site is not located within a flood zone, and there are no ecological or open space designations applicable to the Site. The Site does not include any listed buildings. It is, however, located in a zone of archaeological potential (Local Plan policy EN2).

Proposed redevelopment

The Site currently provides office accommodation and ancillary car parking. USS requests that the Council allocates the Site for mixed-use development within the Local Plan Partial Update, to include a mix of office accommodation alongside the introduction of residential use. This could be achieved through the comprehensive redevelopment of the site and / or increasing building heights.

The proposed uses are in line with the surrounding context, which comprises a mix of office, residential and retail uses. The Site is well placed within Reading to capitalise on the existing transport infrastructure and its proximity to a variety of town centre uses, including education provision, shops and services. It is a highly sustainable location which benefits from significant amenity provision. Redevelopment of the Site to accommodate a mixed-use scheme would accord with the NPPF's overarching objective of sustainable development.

Office

USS is exploring options to redevelop the Site to provide modern, flexible office space to meet current and future market requirements. As the Site is located within an 'Office Core' as identified by Local Plan policy CR1, it is considered to be a suitable location for major office development in line with the strategic vision for the Council. Local Plan policy EM1 states that:

"Provision will be made for a net increase of 53,000-112,000 sq m of office floorspace and 148,000 sqm of industrial and/or warehouse space in Reading Borough for the period 2013 to 2036."

The Council's 'Annual Monitoring Report 2021 – 2022' ('AMR 2022', dated December 2022) sets out that there has been a net loss of 74,203 sqm of office floorspace over the whole plan period to date (2013 to

2022). This figure does not include the office floorspace that currently benefits from unimplemented planning permissions as this is not guaranteed to be delivered.

In 2021-2022, there was a net loss of 26,109 sqm of office floorspace through planning and an additional net loss of 4,158 sqm through construction completions.

Through comprehensive redevelopment of the Site, the office provision can be intensified by constructing additional storey height and introducing development to the car park. Concurrently, redevelopment would enable the introduction of a modern workspace designed in the context of the post-covid working environment and changing sustainability requirements such as meeting minimum energy efficiency standards of an EPC rating of B by 2030.

Redevelopment would attract new occupiers and employees to the office core, helping to address the current vacancies within the units.

Residential

The site is located within Central Reading (adjacent to the train station), the office core and partly within the town centre primary shopping area. The introduction of residential uses as part of a mixed use development is considered to be in line with existing policy at both the local and national level. The introduction of residential uses on the Site will support the vitality of both the primary shopping area and the office core. It will provide a vibrant, well-connected and amenity-rich environment for residents to live through the redevelopment of a brownfield site. It would also help to protect the medium- to long-term housing delivery pipeline and is a site suitable for density.

In relation to the provision of housing, Local Plan policy H1 states:

“Provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough from 2013 to 2036.”

The AMR 2022 demonstrates that the Council benefits from a total housing land supply of 6.30 years; however, the affordable housing delivery targets, as outlined in Local Plan policy H3, are not currently being met.

At the time when the Local Plan was adopted in 2019, the assessment of housing need was based on the 2012 National Planning Policy Framework (NPPF) and associated Planning Practice Guidance,

Since then, the standard methodology has been amended, with the most recent change in December 2020. This has resulted in a 35% uplift in housing provision targets to the urban local authorities in the top 20 cities and urban centres, which includes Reading. This would result in a need of 883 homes per year (Review of the Reading Borough Local Plan 2019 (2023) report).

Across the plan period so far (2013 to 2022), the AMR 2022 (page 103) sets out the Council is currently behind on its target for ‘dwellings completed in Central Reading’ to date, having only completed 2,442 dwellings, compared to a target of approximately 7,600 dwellings. It is noted that this target is not policy supported within the adopted Local Plan, although it does provide an internal target for the Council, which would align with sustainable management of dwelling completions.

In the above context of achieving a significant increase in housing provision and strengthening the trajectory of housing delivery in Central Reading, USS considers it appropriate to deliver residential uses at the Site in an established urban area located in Central Reading and improving the appearance of the area surrounding Reading train station.

Scale and Massing

Given the local context, and based on initial feasibility work, USS considers that the Site's redevelopment could provide a mixed-use development between 10 to 15 storeys in height. This is considered appropriate given the context whereby land to the immediate north and west of the Site is allocated within the Station Area Tall Buildings Cluster (Local Plan policy CR10a) and within the Station/River Major Opportunity Area within policy CR11. As such, the neighbouring area is currently undergoing a period of significant redevelopment, whereby buildings heights are being increased.

Policy CR10a identifies the Station Tall Buildings Area Cluster as:

"A new cluster of tall buildings with the station at its heart will signify the status of the station area as a major mixed-use destination and the main gateway to and most accessible part of Reading".

USS considers that development at the Site will positively contribute to this proposed cluster of tall buildings through the addition of height whilst remaining subservient to the proposed tall buildings within the cluster. It is considered that this will create a progressive step down in height towards the fringes of the cluster and provide a point of architectural interest.

Policy CR11 (i) provides context for development in the Station/River Major Opportunity Area, stating that it should:

"i) 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 southeast. Development for education will be an acceptable part of the mix".

This policy recognises that large parts of the area are currently of low density, and although many of these are in active use, they represent an inefficient use of one of the most accessible locations in the South East. Whilst not directly included within this Local Plan designation, due to the immediate proximity, USS considers that the Site should seek to contribute towards the identified Opportunity Area, to be achieved by delivering a high-density mix of uses.

Furthermore, there currently exists low building cover across the Site currently and a low density of floorspace considering the scale of the Site.

In line with Local Plan policy H2, density, USS considers that the Site is surrounded by high-density development achieving greater heights which is a defining feature of the local character, which will progressively strengthen as further buildings are completed. Furthermore, the Site benefits from the highest levels of accessibility by walking, cycling and public transport available in Reading. As such, it is reasonably considered appropriate to seek a mixed-use redevelopment at the Site which delivers a height and density increase when compared to the existing buildings.

USS recognises that Site B is included within the Market Place/London Street Conservation Area. As a result of this designation, proposals would seek to protect and enhance the setting of heritage assets.

Deliverability

USS is the sole owner of the whole of the Site and, therefore, can bring forward a comprehensive redevelopment. USS, therefore, considers that there are no operational constraints to prevent an allocation for mixed-use development. USS seeks to deliver the proposed redevelopment within five to ten years.

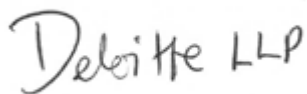
Summary

In summary, USS is promoting the Site through the Call for Sites consultation to be allocated for mixed-use development in the Local Plan Partial Review. A significant amount of floorspace is currently vacant within Site B and there is a need to upgrade the office accommodation to cater for current and future occupiers.

The Site is in a highly sustainable location and the redevelopment would provide the regeneration of brownfield land that would provide both office and residential accommodation in the heart of Reading.

USS is pleased to have the opportunity to promote the Site through the Council's Call for Sites consultation, as part of the Local Plan Review and requests to be informed on the progress of the Local Plan updates. In the interim, if you have any queries, please contact Alex Welby (awelby@deloitte.co.uk / 020 7303 5201)

Yours faithfully

A handwritten signature in black ink that reads "Deloitte LLP". The signature is written in a cursive, flowing style.

Deloitte LLP

CR14v: 2 Norman Place

From: [Hope Harrison](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-518996296
Date: 25 May 2023 13:50:45
Attachments: [Reading Site Plan.png](#)

Name: Hope Harrison

Organisation (if applicable): Packaged Living

On behalf of:

Telephone: 07767126228

Email address: hope.harrison@packagedliving.co.uk

Site address: Norman Place
Reading

Are you the owner: No

Who is the owner?: Covea Insurance

Do the owners, or other part owners, support your proposal?: Not known

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: Not known

What is the size of the site in hectares?: 0.55

What is the current land use of the site?: Office Building

What is the proposed land use of the site?: Residential development of up to 240 homes

Has there been any recent market interest in the proposed use of the site?: Not known

What is the likely timescale of the site becoming available during the plan period?: 1 year

Is the site already allocated in a development plan?: No

Please give any other information that you consider relevant to enable assessment of the candidate site: The site is not located within a defined policy area, nor defined as a core employment area.

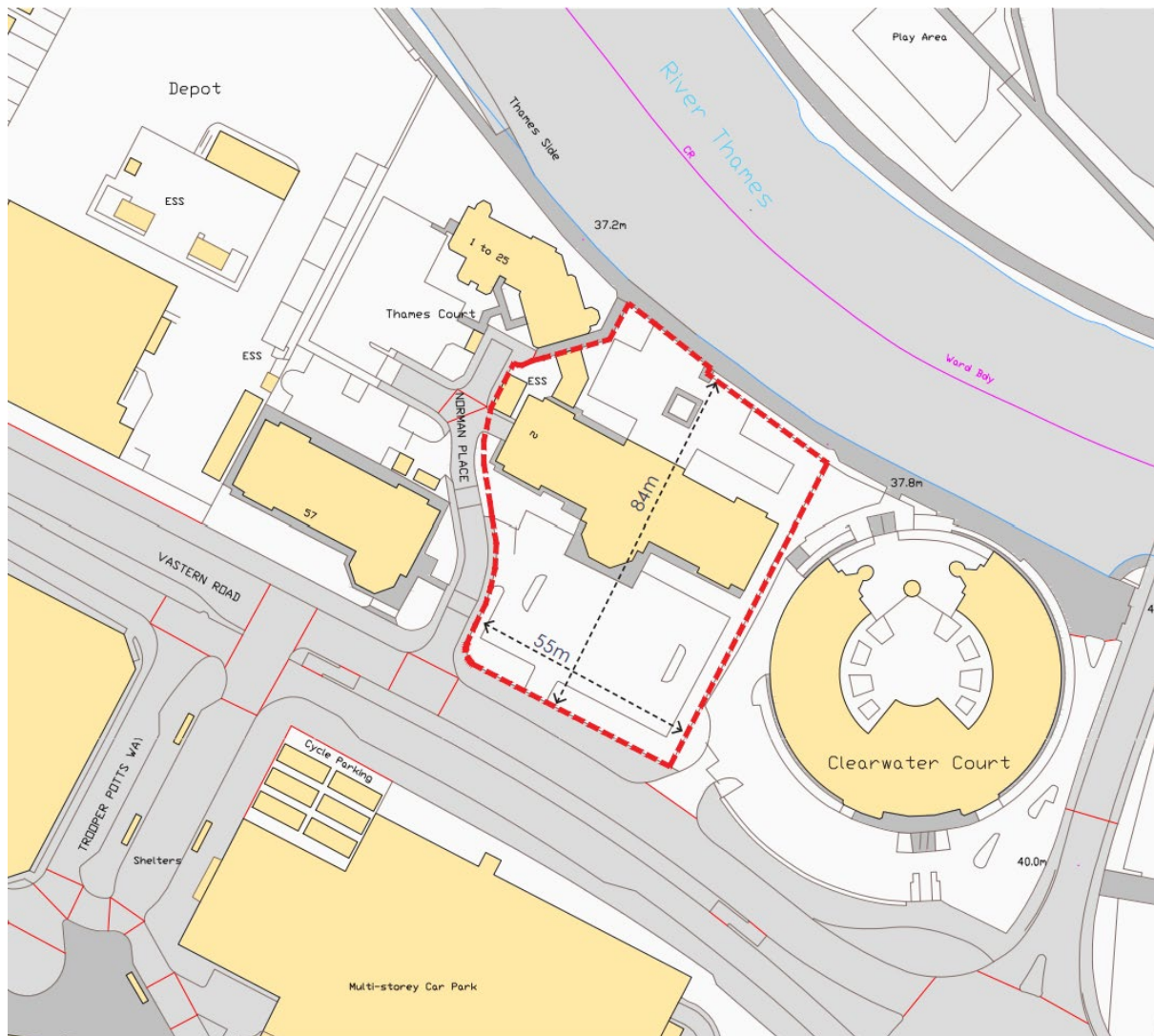
Neighbouring properties to Norman Place comprise a range of residential blocks setting a precedent for redevelopment of the site to good quality residential accommodation. Given the close proximity to Reading Station and the city centre, the location of the site is highly accessible and well suited for residential development.

Reading has demonstrated strong population growth over the coming years and increased demand for housing, however the current supply does not outweigh the increased requirements, suggesting there is a growing demand for appropriate accommodation.

There is limited demand from office occupiers for Grade C office accommodation, and a

lack of viability demonstrates it is not feasible to bring the existing office up to modern day requirements.

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : Reading Site Plan.png



CR14w: Reading Bridge House, George Street

From: [Sarah Moorhouse](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-522355987
Date: 08 June 2023 09:50:28
Attachments: [22805-1000-00 Location Plan.pdf](#)

Name: Sarah Moorhouse

Organisation (if applicable): Lichfields

On behalf of: Vintage Capital (No. 3) Limited

Telephone: 01183341920

Email address: sarah.moorhouse@lichfields.uk

Site address: Site of Reading Bridge House, George Street, Reading, RG1 8LS ("the Site")

Are you the owner: Yes

Are you a freehold or leasehold owner?: Freehold

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: No

What is the size of the site in hectares?: 0.42

What is the current land use of the site?: Employment (Office Building)

What is the proposed land use of the site?: Residential (300-400 units)

Has there been any recent market interest in the proposed use of the site?: Yes

Please provide further details of the recent market interest: The Owners have had multiple approaches from residential developers.

What is the likely timescale of the site becoming available during the plan period?: 5-7 years.

Is the site already allocated in a development plan?: No

Please give any other information that you consider relevant to enable assessment of the candidate site: The Site occupies an excellent riverside location in Central Reading. It is a key gateway site into Reading Town Centre, approximately 300m away from Reading Station and less than 5 minutes to walk from the northern entrance of the station.

The Site is adjacent to the Tall Buildings Station Area Cluster, which is proposed to become a major mixed-use destination and the main gateway to and from the most accessible part of Reading. The Site benefits from a highly accessible location and is bounded by the 23-storey Thames Quarter building to the south making it a logical location for one or more tall buildings.

The existing building on the Site, Reading Bridge House, is 60 years old and is coming to the end of its economic life. Significant ongoing and future repairs and upgrading works

are required for the building to remain operational. The constraints of the existing envelope limit the potential for the existing building to serve as an attractive office block now and into the future.

The office market in Reading currently has high levels of vacancy centred around the town centre with many Grade A developments currently sitting part-vacant. There is a significant development pipeline of new office accommodation in the town centre. The Station Hill scheme alone is set to introduce a further 625,000 sqft of Grade A office space into the market with the first phase due to complete in 2024.

Given the challenges with the physical structure of the existing office block and a saturated office market, Reading Bridge House is not regarded as an attractive option for office occupiers in Reading. The only way for the current owner to maintain occupancy of the existing office block is to offer increasingly higher incentive packages to incoming tenants and significantly discounted rents per square foot when compared to the prime offices in the established office core in Reading to the south of the Reading Station.

There will be major lease expiries at Reading Bridge House in the coming few years and it is not expected that these leases will be extended. Retained letting agents are concerned about the building's ability to maintain its occupancy in competition with the plentiful supply of Grade A and more environmentally sustainable office blocks in the local market.

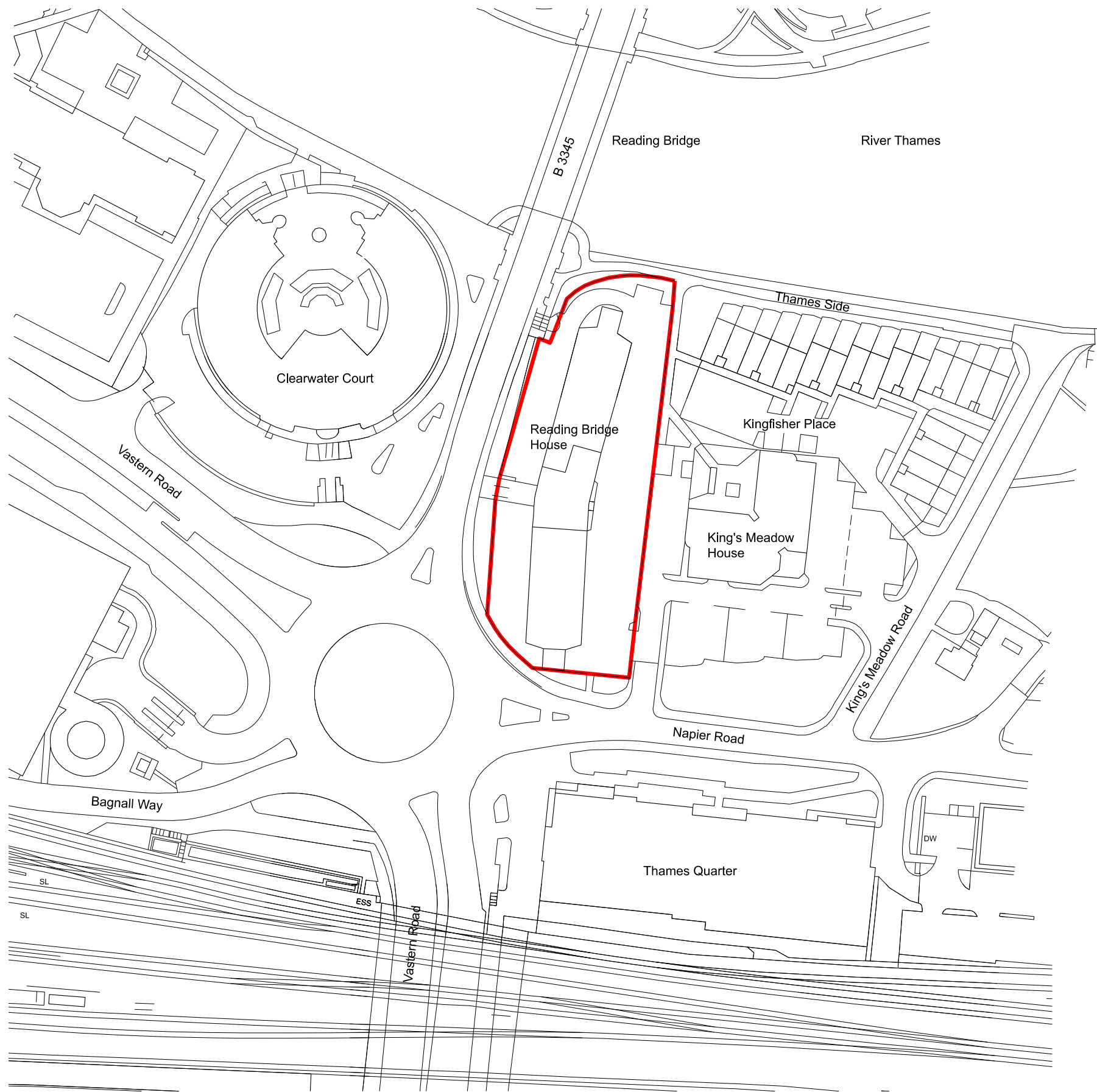
Reading is one of the 20 largest cities and urban centres in England required by the Central Government to deliver a 35% uplift to the housing number generated by the standard method and the adopted Local Plan acknowledges that the centre of Reading is becoming ever more important as a residential location (para. 5.3.22).

The site provides a suitable, sustainable and accessible location for new residential development that could come forward in the medium term to help meet the housing requirements of Reading by providing policy compliant housing.

The site has excellent links to the station, river and local amenities and is in a clear candidate for a natural extension to the Tall Buildings Station Area Cluster. It also provides an opportunity to enhance this key accessible gateway site, utilising its river frontage and its proximity to existing tall buildings.

The current development pipeline for residential stock which could enter the market in the short term is in line with targets, however Reading Bridge House would likely take 5-10 years to bring to market so should be allocated to meet this future need. Demand for residential uses in Reading will continue to grow during this period, due to its proximity to Oxford, London and the new Elizabeth line terminal.

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : 22805-1000-00 Location Plan.pdf



NORTH

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10.0

30.0

50.0

75.0m

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Rev.	Description	Date	Drawn	Chk.

Client
TOPLAND

Project
Reading Bridge House
Reading

Drawing Title
LOCATION PLAN

Drawing Status

Corstorphine & Wright

Warwick Studio
Brook Hall, Brook Street, Warwick, CV34 4BL
01926 658 444
corstorphine-wright.com

Drawing No. 22805-1000				Revision 00
Drawn CW	Checked PH	Paper Size A3	Scale 1:1250	Date 15.05.23

CR14x: Part of Tesco Car Park, Napier Road

From: [Craig Stewart](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-522482194
Date: 08 June 2023 16:50:10
Attachments: [Site plan.pdf](#)

Name: Craig Stewart

Organisation (if applicable): MRPP

On behalf of: Tesco Stores Ltd

Telephone: 02079300007

Email address: craigstewart@mrpp.co.uk

Site address: Tesco Extra, Napier Road, Reading RG1 8DF

Are you the owner: Yes

Are you a freehold or leasehold owner?: Freehold

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: No

What is the size of the site in hectares?: 0.86

What is the current land use of the site?: Customer car parking

What is the proposed land use of the site?: Residential. 150-200 dwellings.

Has there been any recent market interest in the proposed use of the site?: Yes

Please provide further details of the recent market interest: Historic and continuing

What is the likely timescale of the site becoming available during the plan period?: 1-5 years

Is the site already allocated in a development plan?: No

Please give any other information that you consider relevant to enable assessment of the candidate site: This 'call for sites' response is made on behalf of our client Tesco Stores Ltd. Tesco trade from a Tesco Extra store located at Napier Road, in central Reading. The plan attached identifies the site in question.

In summary, Tesco identify that there is an opportunity presented by excess car parking land to facilitate a significant contribution towards the recent, substantial increase in the Council's objectively assessed housing need.

Planning Policy and Increased Housing Need

We understand that a partial update to the Reading Local Plan is to be undertaken, covering around 50% of the policies within the Plan. The Report to the Strategic Environment, Planning and Transport Committee notes that the recent Local Plan Review "has determined that there is a need for a partial update of the Local Plan, in particular to

take account of the new methodology for determining housing needs” (paragraph 1.1).

The increased housing need is dictated by the use of the national ‘Standard Methodology’, per paragraph 61 of the NPPF and the Local Plan Review document calculates that this methodology creates a need for 883 dwellings, a substantial increase from 699 under the previous Plan. Indeed, this was seen to be a sufficiently substantial increase so as to trigger an update of housing policies, and thus allocations. The above need figure will be recalculated in the future to inform the emerging strategic policies, but of relevance is that the recent NPPF draft consultation has reaffirmed the national commitment to a 35% uplift to housing need calculations under the Standard Methodology in the top 20 cities and urban centres, of which Reading is one. The additional housing need in Reading is thus likely to remain significant.

The Site

The site comprises a broadly triangular area of land within the Tesco store car park, measuring approximately 0.86ha in size. Tesco have identified this parcel as surplus car park land, the loss of which would not compromise the operation of the foodstore, reflecting changes in retail climate and support for sustainable travel. The area of woodland located immediately to the east of the site, known locally as ‘The Coal’ is also owned by Tesco.

Outline planning permission for Tesco on the wider site was granted in 1989, with reserved matters approval granted in November 1989.

Site-Specific Appraisal

In site-specific terms, an appraisal of opportunities and constraints provides substantial support for a relatively high-density housing development.

The development plan currently comprises the Reading Local Plan, adopted in November 2019. The site is identified within the current local plan as being within the Central Reading Area, and is previously developed urban land. Both the existing development plan and the National Planning Policy Framework (NPPF) direct that identified needs should primarily be met on such land.

Indeed, the national policy direction within the NPPF on ‘Making effective use of land’ provides that “Planning policies and decisions should [...] promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)” (paragraph 120(d)).

The existing Local Plan identifies the Central Reading Area as having capacity for development by “efficient use of underused land through carefully developing at higher densities”, which “represents the most significant opportunity to accommodate new development within Reading” (5.2.15). The preference for this manner of development has presumably only increased given the aforementioned increase in objectively assessed housing needs within the emerging Partial Review.

The site is well-connected to the rest of the Central Area via a footway along Napier Road and the Napier Road Underpass. Bus service 148 also links the Tesco Extra store with the town centre, approximately 2km away. Reading Station is located approximately 1.4km / 18 minutes’ walk away from the site, with excellent transport connections. This

connectivity provides access to the requisite amenities and facilities via sustainable transport methods, of course alongside the Tesco Extra store itself.

When compared with much of the remainder of the Central Area, the site is unconstrained by surrounding development. There are no existing residential properties in the immediate vicinity, and nor are there any industrial or otherwise incompatible uses. The site is thus without constraints or concerns regarding residential quality. The site is also likely of sufficient viability so as to provide its full, policy-compliant share of affordable housing.

In heritage terms, the site is not located within a Conservation Area and is not in the immediate vicinity of any designated heritage assets. The closest heritage asset is the Grade II listed Railway Bridge, located approximately 150m to the south east of the site and is afforded screening by the surrounding wooded area. It is confirmed within the existing Local Plan that heritage interest constrains much of the Central Area (5.1.7), and thus the relative lack of heritage assets on this site provides an opportunity for development of a relatively high density.

The disposal site lies within the ‘Area Safeguarded for Crossrail’. This does not prevent development, and simply requires any applications affecting the land to be statutorily referred to Transport for London for consultation. The Local Plan Review document notes that the Elizabeth Line to Reading is now operational and that “the land covered by the direction and shown on the Proposals Map has not been required” (3.508). Thus while the safeguarding direction has not been formally withdrawn, this does not provide a constraint to development.

The site falls entirely Flood Zone 2 as identified within the Environment Agency’s ‘Flood Map for Planning’. This is, however, not to be seen as a constraint on development in itself, given that the Local Plan’s assessment of the Central Area notes that “much of the centre, including some of the more obvious redevelopment opportunities, lies within the flood plain” (and parts of the centre lie within Flood Zone 3, less sequentially preferable).

The area surrounding the site, but not the site itself, is of landscape and biodiversity interest with relevant designations. The area of woodland adjacent to the site, known as ‘The Coal’, is an Area of Biodiversity Interest, along with the woodland belt to the north and the open land at Kings Meadow. The latter two are also designated as ‘Local Green Spaces’, but this does not extend to include The Coal. While development should be sensitive to these designations, it is relevant for potential residential quality that the site is afforded access to areas of landscape and visual amenity. Development on the site could provide opportunity for improvements/maintenance to The Coal, or public access if this were an aspiration of the Council.

The site is adjacent to the ‘Major Landscape Feature’, the Thames Valley. This also does not preclude residential development on the site, but development ought to respect the Thames Valley through sensitive design and consultation with relevant groups. Again, this Feature would add to the visual amenity value experienced on the site.

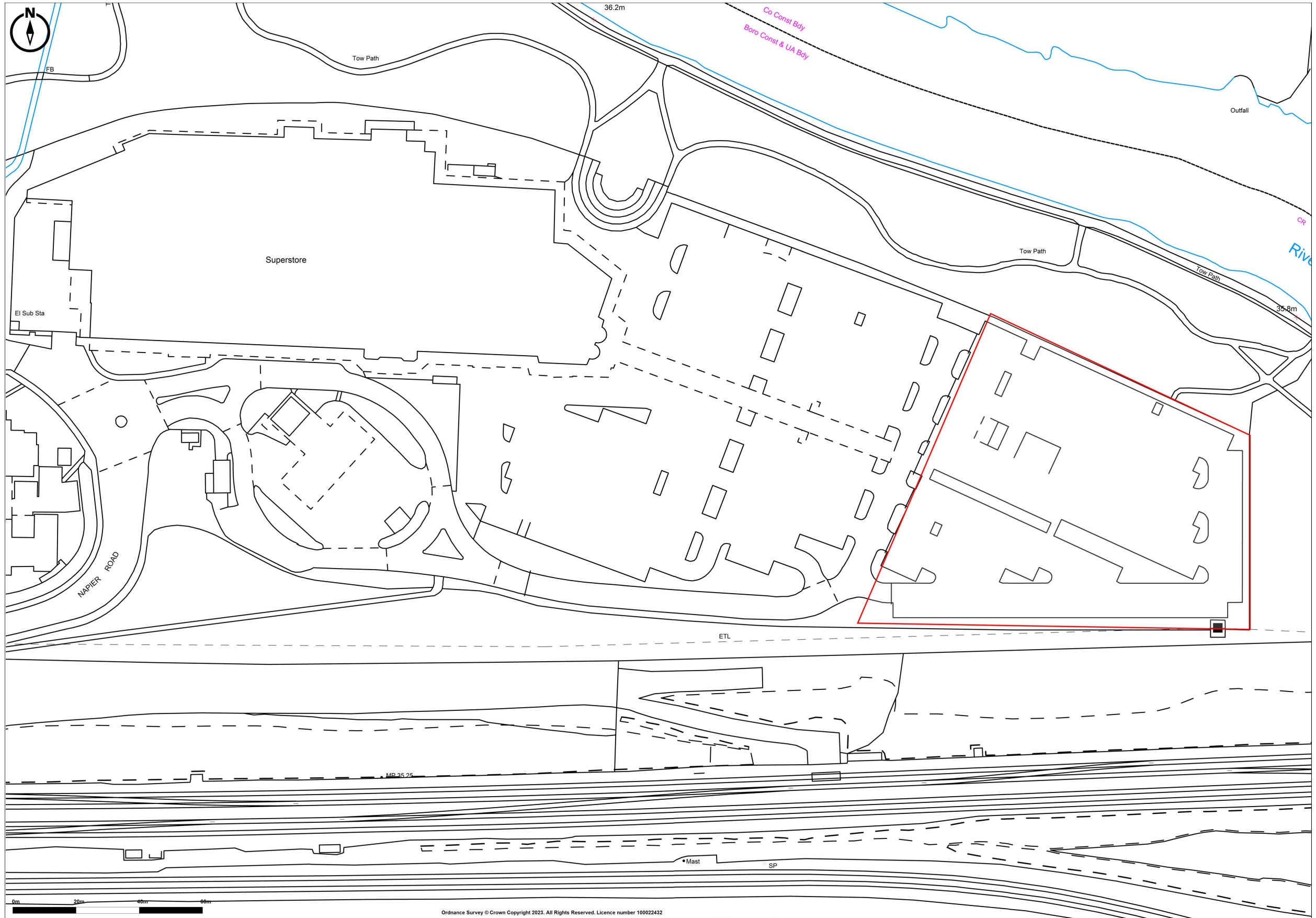
Conclusion and recommendations

The above appraisal provides that the site constitutes an excellent opportunity for residential development. Its nature as previously developed land within the Central Area supports development of a relatively high density to provide a substantial contribution towards the recent increase in objectively assessed housing need. The site benefits from excellent access to amenities and services, including the Tesco store itself. The surrounding landscape and biodiversity interests and designations should encourage

development towards a sensitive and complementary approach but do not prevent development in principle, rather they enhance amenity value.

In light of the increased housing need and to optimise use of this previously developed, urban site (as directed by local and national policy), and with reference to comparable residential schemes, a relatively high density would be appropriate. It is therefore considered that the site could provide for 150-200 dwellings, at a high density and with a greater proportion of smaller unit sizes.

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : Site plan.pdf



CR14y: Kennet Place, Kings Road

From: [Michael Evans](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-526361274
Date: 23 June 2023 16:24:43
Attachments: [Kennet Reading Site Plan.pdf](#)

Name: Michael Evans

Organisation (if applicable): Jigsaw Planning and Development Ltd

On behalf of: Westcore Europe

Telephone: 07809119336

Email address: planning1@live.co.uk

Site address: Kennet Place Kings Road Reading RG1 3ES

Are you the owner: Yes

Are you a freehold or leasehold owner?: Freehold

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: No

What is the size of the site in hectares?: 0.7

What is the current land use of the site?: Offices

What is the proposed land use of the site?: Conversion to approximately 70 apartments

Has there been any recent market interest in the proposed use of the site?: Not known

What is the likely timescale of the site becoming available during the plan period?: 1-5 Years

Is the site already allocated in a development plan?: No

Please give any other information that you consider relevant to enable assessment of the candidate site: Poorly performing office space with limited lease remaining of existing occupants.

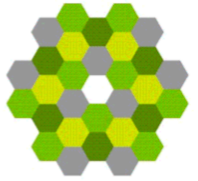
Accessible and sustainable site for conversion to approximately 70 residential apartments, close to Reading Town centre.

Suitable for conversion with associated parking and amenity space to be made available.

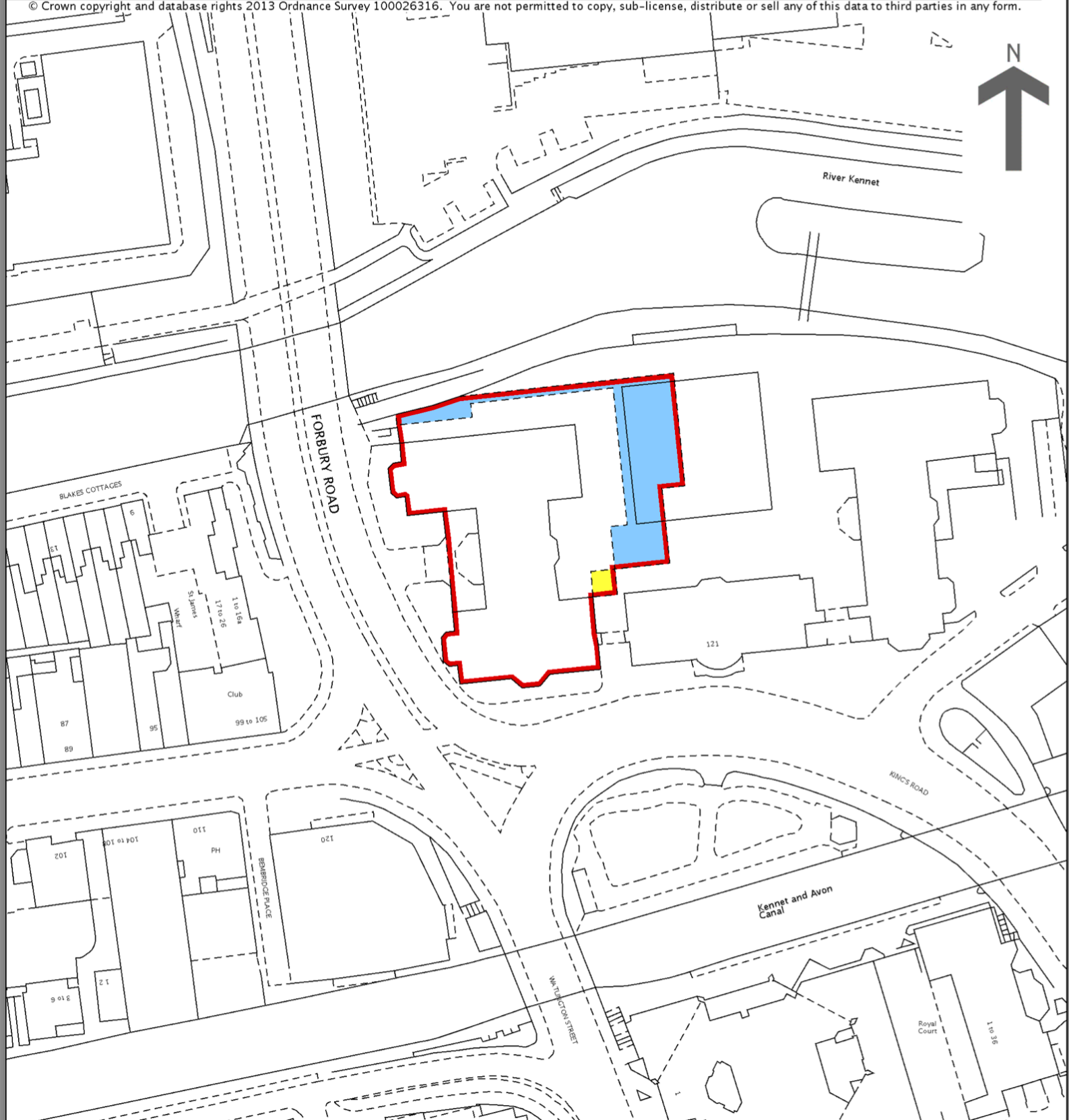
Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : [Kennet Reading Site Plan.pdf](#)

Land Registry Current title plan

Title number **BK455113**
Ordnance Survey map reference **SU7273SW**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Reading**



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CR14z: Sapphire Plaza, Watlington Street

From: [Jonathan Walton](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-522240747
Date: 07 June 2023 17:14:37
Attachments: [Sapphire Plaza Reading - Planning Summary_070623.pdf](#)

Name: Jonathan Walton

Organisation (if applicable): Opus Works

On behalf of: Mapledurham Properties Ltd

Telephone: 07768968030

Email address: jonathan.walton@opus.works

Site address: Sapphire Plaza, Reading, RG1 4TA and RG1 4RE. Land held under three titles - BK103755, BK235993 and BK335473

Are you the owner: Yes

Are you a freehold or leasehold owner?: Freehold

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: No

What is the size of the site in hectares?: 0.4

What is the current land use of the site?: Office with associated parking (Sapphire Plaza),
Residential Block with disused commercial space, plus associated parking (Royal Court)

What is the proposed land use of the site?: Residential-led scheme comprising 250 - 400 dwellings and c. 3,000 sqm E Class uses
Potential for medical, retail and ancillary community facilities within non-residential floorspace

Has there been any recent market interest in the proposed use of the site?: Yes

Please provide further details of the recent market interest: Confidential, can be supplied if needed

What is the likely timescale of the site becoming available during the plan period?: 1-5 years

Is the site already allocated in a development plan?: No

Please give any other information that you consider relevant to enable assessment of the candidate site: Please see attached Planning Summary Note, which also includes site location plan.

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : Sapphire Plaza Reading - Planning Summary_070623.pdf



Sapphire Plaza, Reading

Call for Sites Submission, June 2023

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2.	Background to the Application Site and Planning Policy Context	4
3.	The Proposed Development	6
4.	Planning Analysis	7
5.	Summary and Conclusions	12

Contact

Jonathan Walton

jonathan.walton@opus.works

June 2023



1. Introduction

- 1.1 This planning summary has been prepared to assist with site considerations at Sapphire Plaza, hereinafter referred to as 'The Site'.
- 1.2 The summary outlines the client's aspirations to progress with a residential-led, mixed-use scheme that could potentially exceed the identified policy limit of 12 storeys or 36m for residential development, according to Policy CR10 of the Reading Local Plan 201 .
- 1.3 The site is unique located within an island site, bounded on all sides by roads and the Kennet and Avon Canal.
- 1.4 The site is located directly adjacent to the Reading Central Core Area and Eastern Grouping of the Tall Buildings Zone and is well connected by road, footpaths and cycleways, as well as the canal. The site also benefits from adjacent public open space and significant on-site car parking.
- 1.5 The site is within the administrative boundaries of Reading Borough Council. The Development Plan currently comprises the Reading Local Plan 201 and connected Supplementary Planning Documents covering *inter alia* affordable housing and sustainable design and construction.
- 1.6 The site is within close walking distance of Reading Town Centre and a number of public transport nodes and facilities. As such, the site is highly sustainable and significantly well-connected.

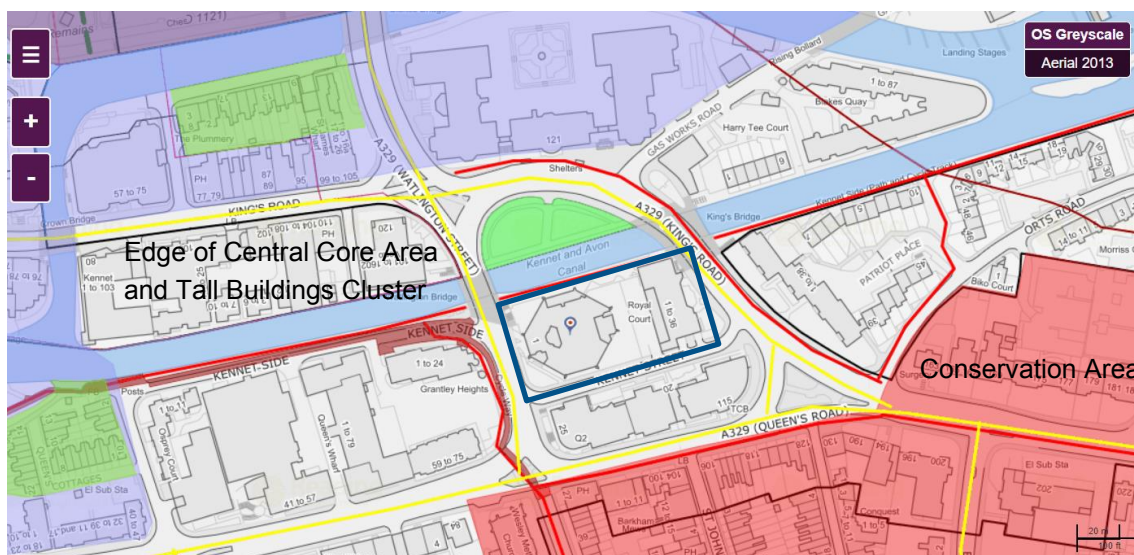


2. Background to the Application Site and Planning Policy Context

Policy Context

Proposals Map

- 2.1 The red lines identify local cycle routes, and that shaded pink/red to the south of the site demarcates the part of the extent of the Eldon Square Conservation Area. The green area to the north of the site identifies the public open space and the blue shaded area between the POS and the site shows the line of the Kennet and Avon Canal, which is a defended waterway. In addition, the site is within an Air Quality Management Area and the Reading Central Area.



- 2.2 As set out on the proposals map, there are no site specific designations:
- 2.3 The site thick blue line – illustrative falls just outside the Central Core Area pink line and Tall Buildings Eastern Grouping black line, which are both situated to the north of the canal.
- 2.4 Detail of relevance to any emerging proposals on site is principally set out in the 'CR' policies of the Local Plan, in particular, Policy CR1 Central Reading Policies CR2 and CR3 Design and Public Realm Policy CR6 Living and Policy CR10 Tall Buildings, which allows for buildings of over 12 storeys if residential and a 36m maxima.

Other Policy, Legislative Considerations and Planning History

- 2.5 The site is located close to the Eldon Square Conservation Area, as well as significant heritage assets including the Methodist Church, Church of St. John the Evangelist, Reading Gaol and the Reading Abbey Quarter. In this context, careful consideration of scale, massing and external appearance will be required to ensure that the proposals do not detract from specific buildings or wider amenity by virtue of bulk, dominance or materiality.



- 2.6 The Historic England listed building map see map after paragraph 4.11 indicates that all heritage assets are relatively distant from the site. However, Officers will want to be certain that there is no undue impact on views, whether short or long-distance. To this end, it may be appropriate to step buildings towards the centre of the site and away from the western boundary, where potential for impact on views of the above heritage assets is greatest. A full HTVIA will be utilised to determine that appropriate in terms of scale and massing should the site come forward. Initial inputs have highlighted that a scheme can come forward that protects views from key assets such as the Gaol and listed assets on Watlington Street.
- 2.7 Given the Council's desire to uplift this area of Reading, and in light of numerous 'tower' developments emerging in the Borough, some in e ually close proximity to heritage assets, including the Grade I Town Hall and St. Mary's Church, it is considered that a case can be made for height on site, particularly in light of that in-situ and ad acent development forming the Clarendon House implemented development ref:180 0 , Q2 and the 'Prudential' buildings. Consideration will need to be given to the uality of scheme and potential supporting non-residential uses/associated regeneration brought forward.
- 2.8 As noted above, the site falls within the extent of the Air Quality Management Area AQMA . In this respect, full consideration of window openings, balcony provision and internal air uality of units will need to be explored and agreed with the Council's Environmental Health Officer as part of scheme development.

Permitted Development

2. A prior approval application for the change of use of Sapphire Plaza to comprise 85 residential units was made in December 201 with the Council determining to allow the scheme to progress in February 2022. Whilst this scheme was not implemented due to the tenant exercising final notice to extend to May 2024 and therefore fell away in February 2023, the residential numbers associated with the scheme have formed part of the Council's earlier considerations on housing land supply and therefore dwellings being progressed on site will help work towards existing numbers as well as the uplift sought through the Local Plan Review.



3. The Proposed Development

Site Opportunities and Constraints

- 3.1 The site is currently occupied, but in terms of land-take versus potential for redevelopment, it is contended that it does not represent an efficient or optimal use of land, particularly given vacancy within the commercial unit at Royal Court and vacancy of the majority of floorspace within Sapphire Plaza. It is further recognised that Sapphire Plaza will become fully vacant in May 2024.
- 3.2 There is good potential to optimise the value of the site, as it currently forms an island fronted by the canal and surrounded by the road network on the other three sides. The site is within the central area where the principle of sustainable development applies and the separation of the site from adjacent buildings and the distinction of this land from the core retail and office locations allows for an alternative, more residential-focused use to come forward.
- 3.3 The location of the site, uniquely within an island, allows opportunity for well-considered and located height and massing. Most closely-related buildings will be unaffected due to positioning to the south, whilst existing buildings to the north, east and west are significantly separated.
- 3.4 The existing buildings on site are neither statutorily listed nor on any local list and are not of architectural merit such that they might be worthy of retention. Nevertheless, in view of proximity to listed buildings and the need to provide a high-quality design to satisfactorily blend with the character of the local area and provide an enhanced frontage to Kennet Road, Kings Road and Watlington Street, thought needs to be given to scale, massing, materiality and elevational treatment.
- 3.5 Overall, it is considered that an opportunity exists to redevelop the site in order to make a more efficient use of the available land. This is particularly pertinent given that the site can be developed either in its entirety or in phases and given the relative separation of built form from that adjacent given an 'island' location.



4. Planning Analysis

Overview

- 4.1 The site is located within the settlement boundary and is in a highly sustainable location, which benefits from excellent access to services, amenities and public transport. In the immediate locale are a number of local shops and convenience retailers.
- 4.2 Employment opportunities and additional services are available within Reading Town Centre, and are easily accessible, as are other employment areas that are commutable by rail, bus and water. Indeed, a strategic bus route runs via the site on Kings Road and onto Queens Street to the south, whilst there are also good walking and cycling links to/from the site and town centre adjacent to the site on all sides. Proposals for residential-led, mixed-use development would therefore be consistent with Policy CC6 of the Local Plan.
- 4.3 In considering the relevant sections of the NPPF, it is noted that the Framework promotes the redevelopment of brownfield land and supports the efficient use of land. The NPPF also seeks at paragraph 86 to:
- “...allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary”.*
- 4.4 The proposals will result in the redevelopment of existing residential and office buildings which are less fit for purpose, provide little architectural or visual merit and which do not optimise the site. A proposed change of use to a predominantly residential-led development would help meet the Council's aspirations to deliver more housing and affordable housing, alongside ancillary E class uses.
- 4.5 It is considered that the residential new build can be consistent with the general thrust of policy, particularly if the loss of existing E Class uses can be satisfactorily offset through provision of more resilient, flexible and fit for purpose accommodation within the project scheme.
- 4.6 The client is willing to consider a number of options in terms of non-residential provision, including medical space given proximity to the hospital, a supermarket and an ancillary community/cultural offering.
- 4.7 Given the island location, there is also potential to explore geothermal heating and cooling, an area in which the client has significant international expertise.
- 4.8 Due to positioning adjacent to the River Kennet, scheme design will take advantage of opportunity to create a meaningful gateway into central Reading along the Kennet and to improve access to the river and the general feeling of safety and security in this area. In particular, the Council has significant aspirations to green the riverbanks in order to improve air quality and biodiversity, which redevelopment of the site could help achieve.

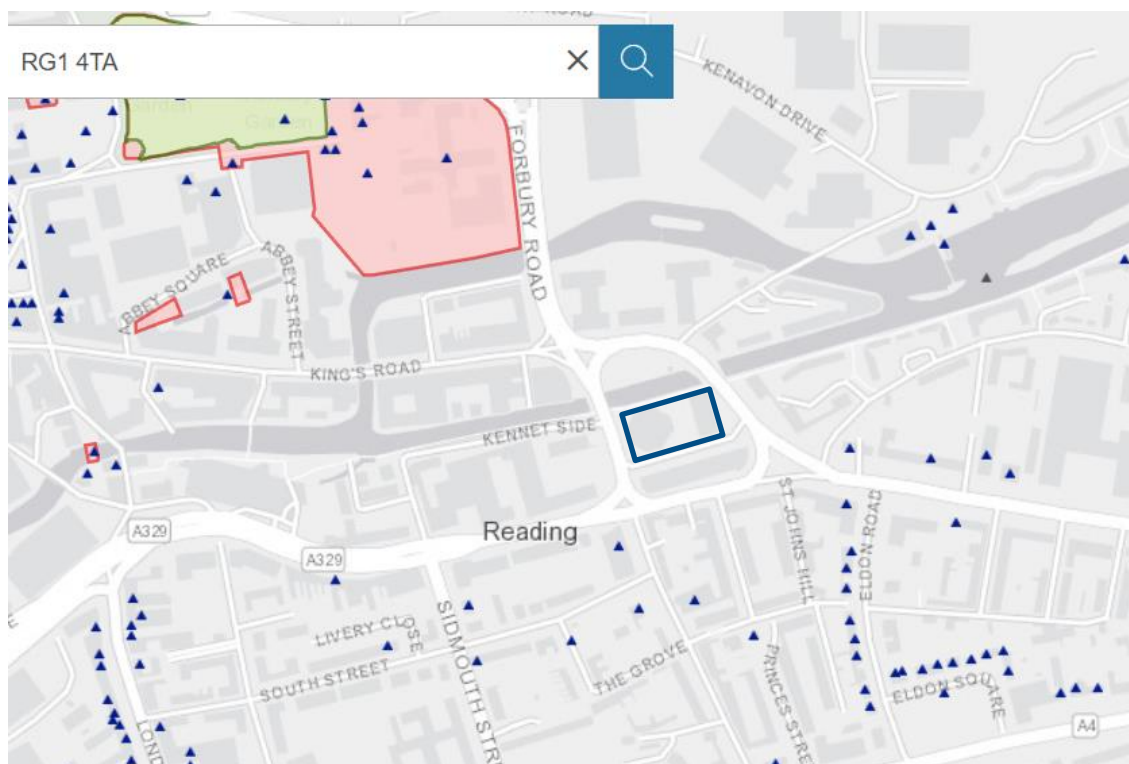


As part of this, consideration can be given to providing access from the site directly to the open space to the north.

4. To provide greater surveillance/security to the location, it is suggested that built form at ground floor incorporates a significant, open lobby area, alongside E class uses to encourage use and to provide active frontage.
- 4.10 Whilst further technical work will be required to determine the exact extent of footprint, height and massing of the residential tower, it is considered that the bridge to the west and canal does help to provide good separation, as well as setting to the site and that opportunity therefore exists to develop a more meaningful gateway than that currently in-situ. Taking into account heights of other buildings in the locality and prevailing planning policy, a baseline height of 12 storeys up to 36m is suggested as the start point for design development, this being what the Council will accept under current policy. Opportunity for further height should be explored, particularly in context of Verto, which is immediately adjacent.

Technical Considerations

- 4.11 Given the presence of listed buildings/structures in the immediate locality, see below, it is recognised that the proposals will require robust justification by a Heritage, Townscape and Visual Impact Assessment (HTVIA), utilising verified views to identify impacts from key vistas. A Daylight and Sunlight Report will also be required to ensure that the proposals do not unacceptably impinge on surrounding amenity. As potentially affected views are more oblique or distant than that relating to either Verto or Clarendon House, it is considered that there will be less downward pressure on built form in order to respect existing assets and viewing corridors, but that there could be some concern over dominance of built form. It is therefore recognised that work is required to provide further detail in terms of how the building will present itself in the streetscene, as well as providing a desirable gateway to Reading from the east.
- 4.12 A suite of supporting documentation to underpin the various aspects of the proposals will also be required, this being as identified in the November 2021 Validation Checklist. Planning requirements will be discussed and agreed with the Council prior to any submission.



Map showing the site (outlined blue) in relation to heritage assets (source: historicengland.org)

Potential Benefits

Environmental

- 4.13 The application proposals will result in the re-urbanisation of under-utilised, heavily landscaped land, allowing for more sensitively designed, environmentally beneficial, more sustainable, energy-efficient development to come forward.
- 4.14 The application site is situated within the settlement boundary and is in a highly sustainable location. A wide range of retail and other facilities are located in the vicinity of the site and a bus stop, serving a strategic bus route, is located in the immediate locale. The accessibility of the site ensures the rail network, as well as services, employment and leisure opportunities found in Reading Town Centre are easily reachable via excellent public transport links.

Economic

- 4.15 During the construction phase a number of FTE construction jobs will be sustained directly¹, with additional jobs being sustained or created through expenditure in the supply chain. It is also relevant that the predominance of jobs sustained during the construction phase will be filled by people living in Reading area and wider region². Measures to directly employ a localised labour force, as well as a number of local sub-contractors will ensure that a greater proportion of salaries and expenditure, arising from the construction phase, is retained in the local economy in line with the Council's Economic policy. It is likely that

¹ Based on research presented in the report 'The Labour Needs of Extra Housing Output: Can the House building Industry Cope?' (HBF, 2005).

² Based on a relatively high degree of self-containment in the local construction labour market see ONS 2011 Census 2011 – 'Location of usual residence and place of work')



work would be phased to retain Royal Court during the Sapphire Plaza build before demolishing and redeveloping this part of the wider site.

- 4.16 Economic benefits also continue during the post-construction phase. The proposed development will result in the re-juvenation of an under-utilised commercial floorplate to provide new dwellings. The future occupiers of the completed homes will patronise local shops and facilities, and in so doing contribute to the viability and vitality of businesses in Kings Road and the adjacent Town Centre shops and services. In addition, the operational benefits and spinoffs accrued through new E class uses will provide a strong source of GVA income to the Borough. It is advised that any planning application is supported by an Economic Analysis and Floorspace Assessment to clearly demonstrate the benefit in redeveloping the current buildings.

Social

- 4.17 The provision of high-quality and well-designed dwellings will provide direct amenity benefits for future residents and will also help to raise the quality of the local housing stock. Meeting Reading's housing need is a clear priority for the Borough and the provision of 1, 2 and 3 bedroom dwellings will help address identified overall and affordable housing requirements over the local plan period.
- 4.18 Redevelopment of the site also provides an opportunity for significant visual improvement of a site that contributes little to the streetscape and where there is a known hotspot for anti-social behaviour. Providing more activity, lighting and surveillance to a gentrified location therefore represents a positive material improvement to the locality.

Other Considerations

Parking and Highways

- 4.1 There is potential for any application coming forward to provide a significant element of car parking as a consequence of existing parking on-site and the potential to retain this within an undercroft and potential sub-ground facilities. Provision of significant EV charging may prove beneficial to the Borough given existing shortfalls in supply, although this would need to be weighed by the Council against a general presumption against car parking in central locations.
- 4.20 Importantly, the location of the site immediately adjacent to the IDR on its western and eastern sides, combined with the island nature of the site ensures that it can come forward irrespective of any future changes to the flow/operation of Reading's Strategic Highway Network.

Design

- 4.21 As described in the previous sections of this report, the proposed development will make effective use of an under-utilised mixed-use site.
- 4.22 The proposal will introduce a significant number of dwellings of varying mix and tenure, as well as a change of use to enable provision of ancillary E Class uses. Careful design and consideration of scale and massing can ensure the resultant development responds well to the character of the local area and the properties in the immediate vicinity.



- 4.23 The new build can help to provide meaningful visual uplift to this area of Reading, which sits at the edge of its most historic quarter, but has until recently suffered from recent lack of investment. The proposals would therefore also meet Council aspirations in terms of greening and visual improvement of the Kennet corridor, as well as improving pedestrian and cyclist safety in the locality.
- 4.24 From initial technical review, it is considered that the site can comfortably accommodate a significant quantum of development and that a tower design may be merited, although it is noted that discussions with the Council's technical officers will be required to fully assess and understand appetite for development.
- 4.25 Feasibility studies by ACG Architects, EAA Architects, Levitt Bernstein and Cullinan Studio have been undertaken which have identified that the site can accommodate between 250 and 400 dwellings and up to 3,000 sq m of E class use floorspace.
- 4.26 A multi-disciplinary team has also been assembled and has provided initial high-level advice to assist design development.
- 4.27 It is the intent of the client to explore the various facets of each architectural approach further, including potentially working with a development partner to review initial high-level advice and undertake further technical and environmental due diligence prior to commencement of meaningful pre-application engagement with the Council.

Air Quality

- 4.28 The application site falls within the boundary of the AQMA as defined in the Proposals Map. In accordance with Policy EN15 of the Local Plan, the effects of the AQMA can be mitigated through removal or restriction of car parking provision in a location that is highly sustainable. It is therefore considered that any redevelopment can accord with the local policy requirement in respect of the matter described.

Impact on the Conservation Area and Listed Buildings

- 4.2 As noted above, the location of the site close to listed buildings and a Conservation Area will require a higher quality, sympathetic design approach to built form and use of any materials to support facade changes. In this regard, early input from a Heritage Consultant will be sought to influence design development. Initial views have identified that a scheme can come forward that respects key views and local heritage assets.



5. Summary and Conclusions

- 5.1 This summary note has been prepared to consider the potential for residential-led mixed-use development at Sapphire Plaza and Royal Court as part of the Local Plan Review.
- 5.2 As demonstrated in preceding paragraphs, the site is in a sustainable location within walking distance of shops and other amenities and is adjacent to a strategic bus route providing services that run regularly into Reading Town Centre and the surrounding area.
- 5.3 The various scheme aspects proposed can provide a sustainable development, which can come forward in a manner that sensitively responds to the opportunities and constraints associated with the site and its surrounding context.
- 5.4 The site is currently under-utilised and the proposed development would make excellent use of previously developed land to deliver much-needed housing and ancillary E Class uses.
- 5.5 The client is open to discussing its plans with the Council further as needed to assist consideration of the merits of this submission.

Opus Works Group Limited

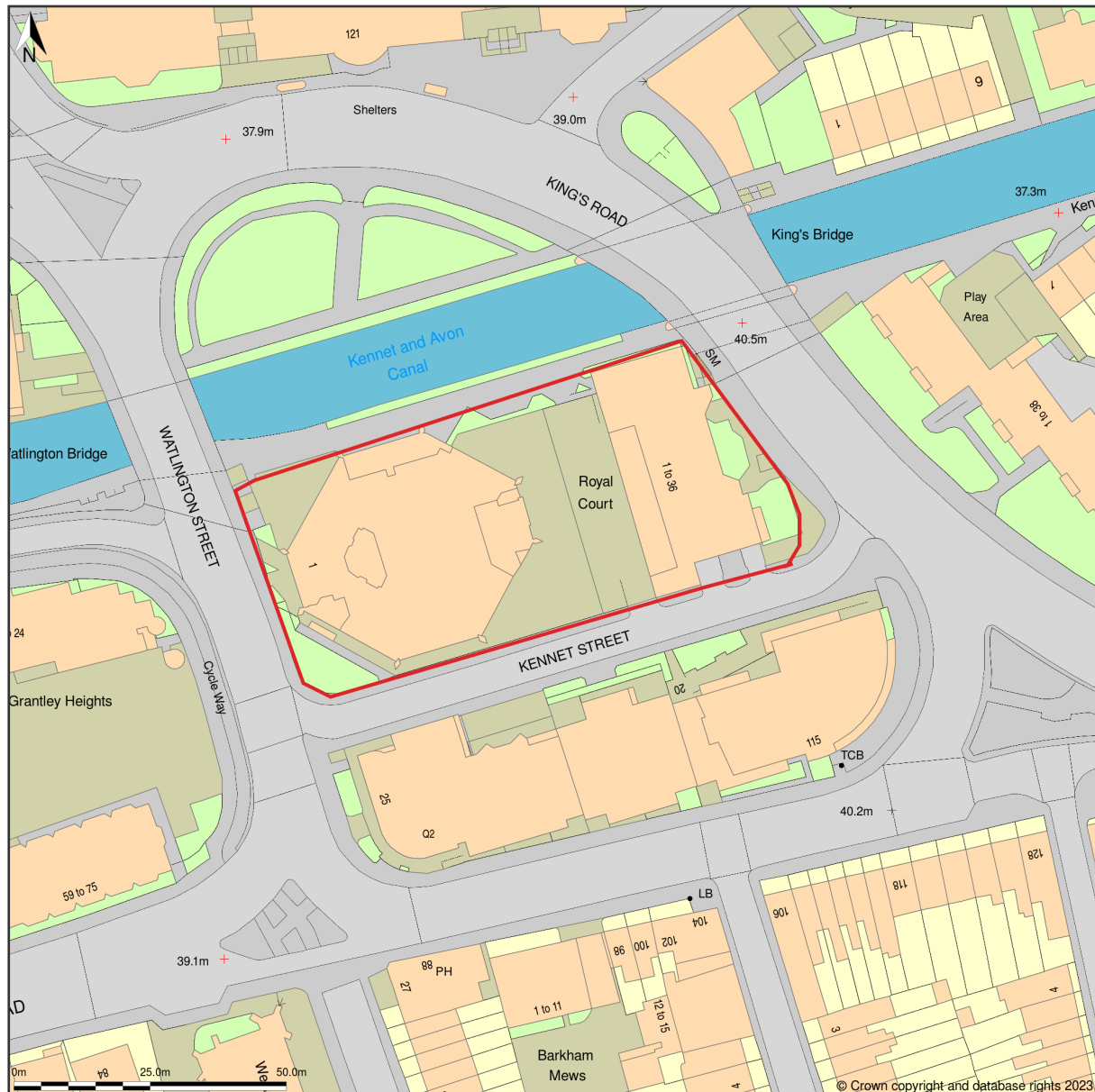
Gardenia House
Church Lane
Ewshot
GU10 5BJ

Registered in England, no: 13706668. Registered Office: 27 Old Gloucester Street, London, WC1N 3AX

<https://opus.works> info@opus.works

T: 0118 343 4217
E: planning@opus.works

Sapphire Plaza, Watlington Street, Reading, RG1 4TA



Location Plan shows area bounded by: 472180.16, 173226.25 472380.16, 173426.25 (at a scale of 1:1250), OSGridRef: SU72287332. The representation of a road, track or path is no evidence of a right of way. The representation of features as lines is no evidence of a property boundary.

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CR14aa: Part of Reading College, Kings Road

From: [Phil Waddup](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-522227568
Date: 07 June 2023 16:50:25
Attachments: [Reading College Call For Sites Plan070623pw \(2\).pdf](#)

Name: Phil Waddup

Organisation (if applicable):

On behalf of:

Telephone: +447921694119

Email address: philip.waddup@activatelearning.ac.uk

Site address: Reading College
31 Kings Road
Reading
RG1 4HJ

Are you the owner: Yes

Are you a freehold or leasehold owner?: Freehold

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: Not known

What is the size of the site in hectares?: 0.5

What is the current land use of the site?: This land is currently used as a carpark for Reading College, occupied by a dance studio building and theatre building. This land currently forms part of a much larger college campus

What is the proposed land use of the site?: Proposed use for the site is a mixed use or purely residential development. If residential, there is potential to create 45+ dwellings in a multi-storied building configuration,

Has there been any recent market interest in the proposed use of the site?: No

What is the likely timescale of the site becoming available during the plan period?: 0-5 years

Is the site already allocated in a development plan?: No

Please give any other information that you consider relevant to enable assessment of the candidate site: The land forms part of an established college campus in Reading. The proposed site is occupied by a college carpark and aged buildings. There is vehicular access and pedestrian access from Kings Road and potential to establish a vehicular and pedestrian access point from Kingsgate Street. There is good access to public transports with a bus stop and main bus routes to main centres immediately adjacent to Kings Road. The wider campus has been subject to a number of extensions and adaptations, with planning consent granted for educational use. The site in scope is largely undeveloped carpark. The 2 buildings on the targeted site comprise of an old building in poor condition, still used by the college which has no architectural merit. Building 2 is owned by the

college, but is leased out to Reading Repertory Theatre. This building is not listed, but has some architectural features and public use which could add value to any proposed development. Planning application events associated with the wider college campus are detailed below.

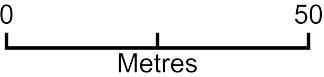
New ASD Centre - 29/03/2013; New Reception atrium to Block 3 and cladding to Block 3.
11/02/2011 (relocation to main campus from crescent road)

Demolition for 2 single storey buildings and erection of a 5 storey academic building –
26/07/07 (outline consent) 13/06/08) full application;

16/01/2002 – TVU – student housing with small conference room and bar to support
Reading College campus.(REF 990963) – Nick Evans Architecture – (Sold not
implemented by College); 12/10/2000 – TVU – New workshop building infill between two
existing workshops - Nick Evans Architecture; There may also be an application/consent
granted in 2022 for Reading Rep alterations to Theatre - but we don't current have the
details.

**Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in
red. : Reading College Call For Sites Plan070623pw (2).pdf**

Reading College - Call For Sites Plan



Plan Produced for: Reading College pw070623

Date Produced: 07 Jun 2023

Plan Reference Number: TQRQM23158143846796

Scale: 1:1250 @ A4

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SR1c: Island Road A33 Frontage

From: [Vincent Bartlett](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-522240164
Date: 07 June 2023 17:50:39
Attachments: [230606 SR1c plan Reading BC Call for Sites.pdf](#)

Name: Vincent Bartlett

Organisation (if applicable): Thames Water

On behalf of:

Telephone: 07747 645449

Email address: vincent.bartlett@thameswater.co.uk

Site address: Land at Island Road Major Opportunity Area bound by Island Road, Sewerage treatment works, Longwater Avenue and the A33. RG2 0GA,

Are you the owner: No

Who is the owner?: Reading Borough Council

Do the owners, or other part owners, support your proposal?: Not known

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: Not known

What is the size of the site in hectares?: 10

What is the current land use of the site?: Short term overflow car parking

What is the proposed land use of the site?: Retention of allocated flexible employment uses but introducing greater clarity that storage and distribution could form part or all of the use of the site.

Has there been any recent market interest in the proposed use of the site?: Not known

What is the likely timescale of the site becoming available during the plan period?:
Within the plan period 1-10 years

Is the site already allocated in a development plan?: Yes

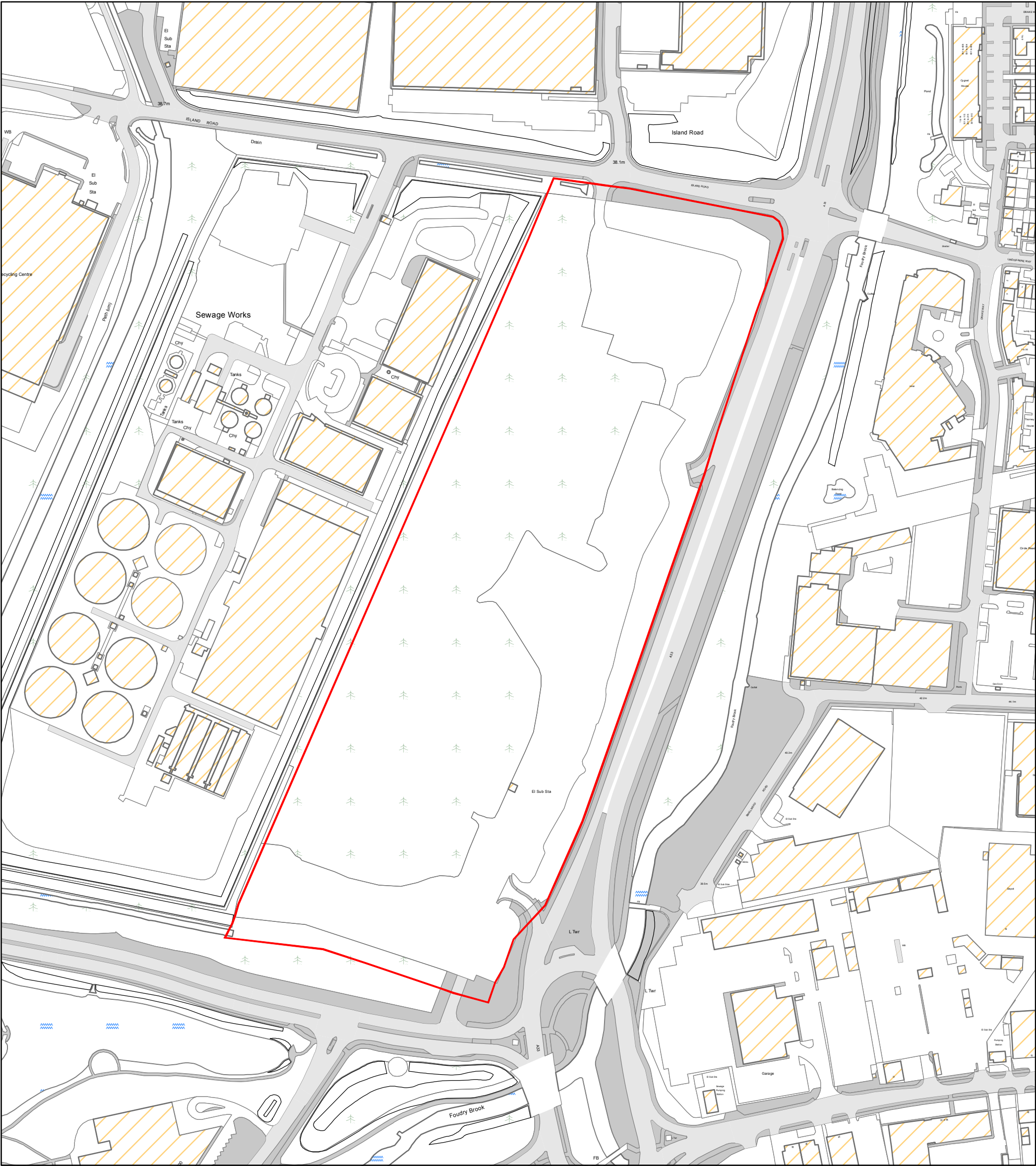
If yes, and the proposed use is different, why do you consider that the allocation should be changed?: The site is currently allocated as SR1c, Island Road A33 Frontage. Thames Water continues to support the flexible commercial uses in this allocation. Since the allocation was made over five years ago the need for and importance of storage and distribution has increased. This is reflected in the Council's intention to review policies SR1 and EM1 responding to the NPPF para 83 requiring planning policy to consider the need 'for storage and distribution operations at a variety of scales and in suitably accessible locations'. The Council has also indicated a shortfall in the delivery of storage and distribution land across the borough and this site presents a good opportunity to at least safeguard the opportunity to bring the use forward. The SR1c site is able to operate at a viable scale for a storage and distribution operation and is in a highly accessible location which complements existing neighbouring uses, can assist - through supply chain - in the

development of other industrial and commercial uses and also to serve the Reading market.

Please give any other information that you consider relevant to enable assessment of the candidate site: The addition of storage and distribution to the allocation is considered to be compatible with the neighbouring uses including the A33 and Sewerage Treatment Works. The site remains deliverable in the Local Plan period with no known deliverability constraints. The extant allocation demonstrates the acceptability of employment uses including industrial and warehousing. Storage and distribution is broadly considered to have similar impacts to the already allocated uses without the need for further mitigation. Furthermore this position is supported more generally with the recognition that general industrial and storage and distribution uses can be interchangeable through the GPDR. Although not implemented an expired planning permission for office type use demonstrates the acceptability of commercial use and quite likely a more intense use than general industrial including storage and distribution.

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : 230606 SR1c plan Reading BC Call for Sites.pdf

Reading South Side Site Location Plan



Thames Water
Map



Printed By : ccolloff
Print Date : 06/06/2023
Map Centre On : 470909, 170510
Centre Tile No. : SU7070NE

Comments:

Scale 1:2500 @ A3

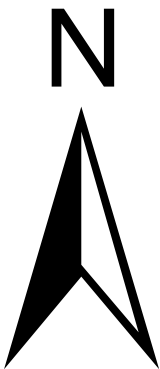
0 30 60 120 180 240
Meters
Current Scale : 1:2,500

Disclaimer: Based on the Ordnance Survey Map with the Sanction of the Controller of H.M Stationery Office License Number:- 100019345

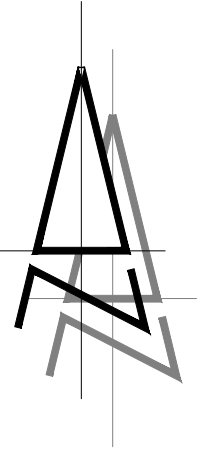
The position of any boundary or apparatus shown on this plan is given without obligation and warranty, and the accuracy cannot be guaranteed.

Service pipes are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Thames Water for any error or omission. The actual position of mains and services must be verified on site before any works are undertaken.

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SR4g: Reading Link Retail Park, Rose Kiln Lane



* ** ***		
Rev	Date	Description



Project
Reading Link Retail Park
Reading

Drawing

Location Plan

Date	Scale @ A3	Drawn
18.05.23	1:1250	CE

Drawing number	Revision
RLRP/001	-

From: [Luke Veillet](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-521920614
Date: 06 June 2023 16:24:51
Attachments: [Reading Link Retail Park - Location Plan.pdf](#)

Name: Luke Veillet

Organisation (if applicable): Boyer

On behalf of: Sorbon Estate Limited

Telephone: 07548094217

Email address: lukeveillet@boyerplanning.co.uk

Site address: Reading Link Retail Park, Rose Kiln Lane, Reading RG2 0SN

Are you the owner: Yes

Are you a freehold or leasehold owner?: Freehold

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: No

What is the size of the site in hectares?: 2.22

What is the current land use of the site?: Retail

What is the proposed land use of the site?: Mixed use of residential and retail. It is envisaged that the site could accommodate approximately 200 apartments and approximately 2,300 sqm of retail floor space.

Has there been any recent market interest in the proposed use of the site?: No

What is the likely timescale of the site becoming available during the plan period?: 11 - 15 years

Is the site already allocated in a development plan?: No

Please give any other information that you consider relevant to enable assessment of the candidate site: About Sorbon Estates

Sorbon Estates is the commercial property company of the Shanly Group. Sorbon own and manage a substantial mixed use commercial and residential portfolio throughout the Home Counties. Sorbon look to bring forward urban regeneration projects by acquiring under managed and unloved properties and creating exciting new mixed use redevelopments, working in conjunction with their sister company, Shanly Homes.

The Site

The Site is in a highly sustainable location, approximately 650m south of the boundary of the Central Reading Area, west of the junction of Rose Kiln Lane and the A33. It is located in close proximity to public transport nodes, with bus stops located only 100m from the site to the north, on Rose Kiln Lane. The bus stops serve the centre of Reading and

Reading Train Station, which is only 2.7km from the site (a 7 minute cycle or 25 minute walk). It is also served by the strategic road network, with Junction 11 of the M4 located 3.6km to the south.

The Site comprises several large and dated retail warehouse units permitted in 1980's to the north of the site; with a large parking forecourt to the south. More recently, planning permission was granted for a Starbucks drive through (application reference 201558), which has been built in the north-east corner of the site. The ground floor retail floor space across the site comprises c.6600 sqm.

Immediately to the north-west of the site is Coley Park, a predominantly residential area; with local shops; a recreation ground and amenities. Immediately to the north on Rose Kiln Lane, there are several residential apartment blocks, three to four storey's in height, lining the road frontage. Immediately to the east opposite the Site on Rose Kiln Lane, there is a two storey apartment building (converted from offices). To the west is the Kennet and Holy Brook Meadows. A public footpath runs from Rose Kiln Lane along Holy Brook to the rear of the site, connecting into Holy Brook Meadows. To the south and south-east of the Site, either side of the A33, are a number of commercial premises, including car dealerships and a casino.

Policy Context

The Site is not subject to any significant planning policies or constraints that would limit the redevelopment potential. Whilst the Site bounds Holy Brook, a main river adjacent to the north of the site, the developable area lies solely within Flood Zone 1. It is not within a designated Employment Area, Retail frontage or within the setting of any Heritage Assets. Whilst part of the site is identified to be an 'Area of Archaeological Potential', this is not considered to be a constraint for development and would be investigated through the ordinary planning application processes, if necessary. It is also noted that part of the site is located within an Air Quality Management Area (AQMA). Again, this is not considered to be a constraint, given the existing use of the site. Any development would be seeking to minimise air pollution, through promotion of sustainable transport modes. Adjacent to the west of the site is Kennet and Holy Brook Meadows, a 'Major Landscape Feature' and identified 'Area of Biodiversity Interest'. It is not anticipated regeneration of the Site would adversely affect this land and would provide opportunities for conservation, links to the green network and biodiversity enhancement.

Opportunities

The Site is developable, achievable and available within the plan period. It is not subject to any significant constraints that would limit its development potential. The Site provides opportunity to bring forward a high quality mixed-use scheme of residential and retail uses, which would make a an effective and more efficient use of this underused land. Proposals would seek to retain a substantial portion of retail floor space across the site, whilst also providing high quality homes. This would enhance the vitality and vibrancy of the site and surroundings. It is located in an extremely sustainable location, with opportunities to improve and enhance the character and appearance of the site, including the Kennet and Holy Brook Meadows.

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : Reading Link Retail Park - Location Plan.pdf

SR4h: 11 Basingstoke Road



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44 Saffron Hill
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email: info@iceniprojects.com
web: www.iceniprojects.com

Reading Borough Council
Planning and Building Control
Civic Centre
Bridge Street
Reading
RG1 2LU

Wednesday 31st January 2024

Ref. 22/143
BY EMAIL

Dear Sir / Madam,

THE READING LOCAL PLAN PARTIAL UPDATE REGULATION 18 CONSULTATION | REPRESENTATIONS ON BEHALF OF TT GROUP

On behalf of our client, TT Group TTG , we are writing in response to your recent invitation for comments on the Reading Local Plan Partial Update Regulation 18 Consultation. This letter will set out TTGs comments on the consultation version of the Local Plan Partial Update 2023 , as well as provide representations specifically regarding the Reading Zone Switching Centre ZSC site, located at 11 Basingstoke Road, Reading, RG2 0EW the 'Site').

It is understood that Reading Borough Council (the 'Council') undertook a Call for Sites exercise between April - June 2023, in order to identify possible land for allocation and development. Following this, the Council have identified 20 potential new development sites, which are currently under consideration for allocation within the Local Plan Partial Update 2023 . A public consultation to gather views on these proposed sites was launched in November 2023 and closes on 31st January 2024.

While we understand that there is currently no formal mechanism through which to submit representations for prospective development sites, information regarding new development sites with potential for housing-led mixed-use development would still be of interest to the Council at this stage. The 20 sites currently under review may prove to be unsuitable for allocation through the consultation on the Local Plan Partial Update. We therefore submit the following representations regarding this development site in order to notify the Council immediately of this opportunity.

This letter provides an overview of the Site and its context, background on the Site ownership and development context, as well as details of the main planning considerations and the type of development we consider to be appropriate for a site allocation, based on our review of the local planning history, the site context and local planning policy designations.

Overall, we believe the Site represents a fantastic opportunity for redevelopment, and that a site allocation in the Council's Site Allocation Plan would help to unlock its development potential and assist the Council in meeting its future medium to long term development needs.

The Site

The Site is located to the east of Basingstoke Road and to the south of Christchurch Gardens, in south Reading.



Figure 1: Site Title Plan

The Site is comprised of the following buildings:

- Reading ZSC and Trunk – a part-three / part-five storey 1 60s BT switching centre
- The BT Glasshouse Mobile Switching Centre – a two / three storey modern commercial building, constructed c. 1 80s

The ZSC and Trunk building remains in use as an operational BT building, with engineers visiting semi-regularly to maintain, upgrade and install equipment. The Site serves as part of the Public Switched Telephone Network (PSTN) that is scheduled to be switched off by BT in December 2025.

The BT Glasshouse was previously in operation as a 'Mobile Switching Centre' (MSC). The ground floor contains redundant kit related to this function, while the first floor was in historic use as office space prior to relocation of staff. The building is now essentially vacant, with some space being used for storage associated with the original use.

The Site also comprises a significant portion of surface car parking across its northern half, with the surface parking areas forming much of the Site boundary along Basingstoke Road and Christchurch Gardens. It should be noted that there is also substantial tree coverage along the western and northern site boundaries, and there is a Tree Preservation Order (TPO:65/05) on the Site.

The primary access to the Site is provided via a short private access to the north from Christchurch Gardens, with a smaller access point and entrance to a side car park available from Basingstoke Road. The existing buildings within the Site are considered to contribute little to the existing townscape or local character as a result of their incongruous design, hard frontages, and significant associated areas of hardstanding.

The surrounding area can be considered predominantly residential but is home to a variety of uses. Immediately to the north of the Site is the Christchurch Court block of flats, which we understand is

used as sheltered housing. To the east is a small sports pitch, as well as 2 or 3-storey residential properties. With the exception of the existing buildings on the Site and a nearby office block at Whitley Rise Cedar Court, the surrounding area is predominantly low-rise, comprising a range of residential dwellings and flatted developments. There are also a number of complimentary uses within the immediate area, including hotel use, schools, open space, and sport facilities. The Site also lies within a 5-minute walk of two local centres Whitley Road and Basingstoke Road North which provide access to a range of local shops and services.

Due to its proximity to Reading Town Centre and other local centres, the Site is well connected by public transport. The nearest bus stops are located along the western and eastern site boundary on Basingstoke Road and Christchurch Gardens and provide fast and frequent services between Reading Town Centre and South Reading. The nearest railway station Reading is located a 30-minute walk from the site, but can be reached in just over 10 minutes by public transport.

The Site is not located within any Conservation Areas, but lies adjacent to the Christchurch Gardens Conservation Area to the north. The Site is also in close proximity to two Grade II Listed Buildings 64-70 Basingstoke Road which lie approximately 25m to the southwest.

Background

The Site freehold is wholly owned by one party: Telereal Securitised Property GP Limited, with BT in occupation. The exception to this is the small area at the eastern edge of the development site, highlighted in yellow on the above plan. This area has been sold on a 99-year lease to Hart Housing Association and, as such, would not form a part of any wider site allocation. As part of their business planning, TTG are currently exploring options for the future redevelopment of the entire site.

The Site was not previously put forward during the Call for Sites exercise for the Local Plan Partial Review which ran from April - June 2023. As such, it is not currently one of the 20 sites being considered for allocation through the review.

Notwithstanding, TTG are currently in the process of reviewing their assets including this Site and it is likely that there will be an opportunity in the short-to-medium term for BT to fully vacate the Site. As previously stated, the ZSC is part of the network PSTN that will be switched off in December 2025 and the MSC has already essentially ceased operations. Given the Site's proximity to nearby local centres and the fact that the surrounding area is largely residential in nature, we would be considering a comprehensive residential-led development across the Site.

Adopted Planning Policy Context

The adopted Reading Borough Local Plan and Proposals Map 201 identifies that the Site is subject to three planning policy designations, as outlined below:

- Air Quality Management Area Policy EN15: Air Quality
- Existing or Proposed Green Link Policy EN12: Biodiversity and the Green Network
- Article 4 Direction: Removal of normal right to convert a house C3 into a small house in multiple occupation C4 Policy EN1: Protection and Enhancement of the Historic Environment Policy H7: Protecting the Existing Housing Stock.

There are a number of other policy designations nearby which are important to consider. These are:

- Classified Highway Network along Basingstoke Road and Christchurch Gardens to west and north of the Site respectively
- Christchurch Conservation Area north of the Site
- Cycle Route northeast along Christchurch Gardens and Glebe Road
- Grade II Listed Building – 64-70 Basingstoke Road southwest of the Site
- Whitley Road and Basingstoke Road North Local Centres north and southwest of the Site respectively .

The Site is also located within the South Reading area as identified in the Local Plan, which is identified for a significant amount of new residential and employment development over the plan period. The Site is within a 'primarily residential area' within the Council's South Reading Area Strategy Map.

It is therefore considered that there is justification at a local policy level for redevelopment of this key site. This is considered in further detail below in conjunction with other relevant local and national planning policies.

Proposed Site Allocation

Based on our assessment of the Site context, planning policy designations, and the strategic objectives for the area set out within relevant local planning documents, we consider that this Site presents a fantastic redevelopment opportunity which could assist the Council in delivering much needed housing in a sustainable location. Given the longer-term nature of the Site and the various complexities associated with such a constrained urban site, its redevelopment potential would be helped with the provision of a site allocation in the emerging Site Allocations Document.

At this stage, TTG have carried out high-level capacity studies of the Site, taking on board the local context as well as market demand to inform what scale and type of development may be appropriate on the Site. Based on these initial exercises, it seems that the Site would be well placed to accommodate a residential-led development in isolation, or a residential-led development alongside housing for older people. As such, we would like to promote the Site for the following quantum of development, the basis of which could be used to inform a site allocation:

- Erection of 220 residential units comprising a mix of studio, 1-bed, 2-bed and 3-bed dwellings. Potential for dwellings to be split between mix of residential dwellings Class C3 and care home use Class C2 . The precise configuration and mix of dwellings on the Site would be decided during the application stage of development.
- Rationalisation of car parking and access/servicing arrangements across the site as a whole, to deliver a development focused on sustainable and active travel, with appropriate parking to service the new residential uses.
- Improved public realm and pedestrian connections, including potential to deliver section of Proposed Green Link, as designated in the Local Plan.
- Optimisation of the density, heights and massing of the site while respecting and enhancing the existing townscape and historic environment. Capacity studies and assessment of impact on the Conservation Area and nearby properties suggest development of up to 6-storeys, stepping down to 3 storeys may be appropriate on the Site.

Our justification for this approach is provided in more detail below, and we would welcome engagement with the Policy Team and feedback on these outline proposals as the draft Site Allocations Plan continues to be consulted upon and formulated. We have also completed the Call for Sites form and submitted this to the Council for consideration alongside this letter.

Planning Justification for Site Allocation

Residential

The Reading Local Plan sets a target for the delivery of 15,847 homes in Reading Borough for the period 2013-2036, averaging 68 homes per annum. It is accepted in the Local Plan that there is likely to be a shortfall of 230 dwellings in the Reading Housing Market Area, but that this shortfall can be addressed via cooperation on housing targets with neighbouring authorities.

It is noted that, as of 2021-2022, according to the Housing Delivery Test, Reading has been able to deliver 1,818 homes against a three-year target of 1,630, and therefore the actual delivery of housing was at 122% of the housing requirement. Paragraph 74 of the NPPF requires the Council's housing targets to be subject to a 20% buffer, to identify further specific deliverable sites to improve the prospect of achieving the planning supply within the Reading Borough Area.

In addition, the Council's Local Plan Partial Update Consultation Document states that housing need should be calculated based on a national standard methodology that is outlined in Planning Practice Guidance. This methodology takes into account projections of local household numbers and local housing affordability, whilst also applying a 35% uplift to the local authorities that cover the core of the 20 largest urban areas in England, of which Reading is one.

This means that, based on the most recent figures, there is a need for 877 homes per year in Reading up to 2041. This represents a substantial increase from the existing plan figure of 68 homes per year. It is noted that the Council are preparing an assessment to counter the standard methodology provided at the National Level, to provide a figure that is rooted in local need. It is understood that this work is ongoing, and therefore the indicative target of 877 homes per annum may be subject to further revision during the Local Plan Review. Early indications provided by Reading Borough Council indicate that this figure may stand at 735 homes per annum (locally-based figure), or 800 homes per annum using updates to previous Housing and Economic Land Availability Assessment.

Notwithstanding, there is clear evidence that the Council's housing needs target will be revised upwards during the Local Plan Review, regardless of the calculation methodology selected. As such, there appears to be a need – in the short to medium term – for additional, deliverable sites for new housing within Reading, in order to deliver an adequate supply of new homes and contribute significantly to meeting the anticipated demand for new housing across Reading Borough and the wider Berkshire area. It is considered that a site allocation for residential-led redevelopment represents a strong opportunity to achieve significant residential accommodation and contribute towards meeting the housing need, following the increase anticipated through the Reading Local Plan Review.

The NPPF supports the delivery of high quality, well designed housing which meets local needs on sustainable and accessible sites. The introduction and intensification of residential uses in areas with good public transport accessibility and as part of a mixed-use scheme is also a theme which runs through both the NPPF and the Reading Local Plan. In this regard, there is a strong case to support the allocation of the Site for residential use. The Site represents a sustainably located brownfield location, which is well served by public transport and in close proximity to a number of local shops and services. Furthermore, the NPPF and the Reading Local Plan emphasise the importance of meeting housing need through the efficient use of land. The Reading Local Plan states that previously developed land (brownfield land) should be used to ensure that as many new homes are delivered to

meet the identified housing need. Additionally, it is noted within Policy H1 'Provision of Housing' that the provision of new housing 'involves a heavy reliance on previously developed housing, and the supply of such sites constrains the amount of housing that can be delivered in the Borough'.

With regard to the quantum of residential units proposed, it is noted that Local Plan Policy H2 'Density and Mix' states that the appropriate density of residential development will be informed by aspects such as the character and mix of uses in the area, accessibility by walking and the need to maximise the efficiency of land use. Given the highly accessible and sustainable location of the Site, as well as its large size in the context of the local area and the scale of the buildings currently in situ, it is considered that there is a strong case for the optimisation of the site massing and density.

However, at the same time, it is recognised that site constraints do exist, including the nearby Conservation Area and the Listed Buildings. It is therefore considered that any site allocation should include the requirement to enhance the townscape in this part of Reading. Taking this on board, our early-stage modelling has indicated that up to 220 residential units could be delivered across a range of housing types and sizes, and with the potential to also provide housing for the elderly as part of this mix. Such an allocation for residential development is considered to provide a suitable level of intensification for this large, accessible site. Setting an allocation for the scale of development set out above allows enough flexibility to deliver a range of homes within the limit, allowing the project to be deliverable within the townscape, heritage and amenity constraints identified.

Housing for Older People

An initial review of development opportunities at the Site has identified the potential for the inclusion of housing for older people. Policy H6 'Accommodation for Vulnerable People' in the adopted Local Plan states that provision will be made for at least an additional 253 residential care bedspaces for elderly people between 2013-2036, in addition to the overall housing need. Development for specialist accommodation is expected to be located close to community facilities, particularly healthcare services or day care for elderly facilities. Developments to accommodate people with limited ability should also be located within 400m of an identified district local centre.

This need was identified in the Local Plan due to several factors such as a rising population of over-65s anticipated to increase by 60% to 2036 and the fact that many people with existing needs are currently housed in poor or unsuitable accommodation. However, the Local Plan review consultation document updates this position, stating that there has been a substantial provision of extra care housing in recent years in Reading, to the extent that there is considered to be an over-supply, and as such there is no current need for further extra care. The document states that this policy should be amended to make this clear.

Whilst the Local Plan review document notes that there has been an oversupply of Extra Care facilities, we assume this relates specifically to the Extra Care accommodation only i.e. accommodation for over-55s with higher levels of support and care provided, and not the wider older persons housing accommodation which can be provided in a variety of forms, including Care Homes. The type of facilities delivered by an Extra Care facility differ to that of a Care Home, and as such, it is unclear if the Local Plan Review is suggesting that there is a reduced need for both types of accommodation, or just Extra Care.

Regardless, TTG have explored a variety of suitable uses for the Site and advice received from local agents and property experts suggests that there is still substantial demand from retirement operators for more housing for older people in the local area. As such, TTG would like to promote some flexibility in the site allocation to allow for both C2 and C3 uses, and enable the Site to deliver traditional residential dwellings as well as housing for older people if the demand remains.

Public Realm

Due to the quantum of hardstanding, the set back, vacant and secluded character of the Site, as well as hard, inactive frontages, the Site is impermeable and unattractive for people to use to move around. There is currently no pedestrian access through the Site from east to west, with the minor vehicular entrance on Basingstoke Road being obstructed by a gated entry. As a result, it is considered that a site allocation could encourage significant improvements to the permeability of the Site through a comprehensive public realm and landscaping scheme. The goal would be to allow for increased pedestrian connectivity and therefore an improved urban environment.

In addition, the site allocation could encourage increased greening and provision of more soft landscaping. The site allocation would therefore seek to support the walkability, townscape and urban greening aims set out within the Reading Local Plan.

Heights and Massing

The existing ZSC building on the Site is larger in scale and mass than any other buildings in the local area. While there are four storey blocks of flats to the immediate north Christchurch Court and south Avenue Heights of the Site, the surrounding area is predominantly composed of two-three storey dwellings, with a limited number of exceptions such as nearby schools and places of worship.

Notwithstanding, given the presence of nearby flatted dwellings and the current context of the Site, it is considered that there is a strong case to be made for building heights and massing which are at least consistent with the existing buildings within the Site and immediate context. This will result in a similar impact to the adjacent buildings and townscape but allowing for an increase density and intensified use of the Site, in accordance with the NPPF and the Reading Local Plan.

Any future development proposal would also be likely to be of a considerably higher standard of design than the existing 1960's buildings, thereby offering an improvement in the townscape and visual amenity of the locality. The development would take full cognisance of nearby heritage assets, including listed buildings and Conservation Areas. Optimised heights and massing will of course lead to an increased number of housing units and homes for older people, thereby an improved contribution towards the Council's targets in those areas, particularly for housing where the need is most pressing and expected to increase.

If a site allocation were to be taken forward, the Site owner would be keen to work with the Council to test the options for height and massing to ensure these are suitable, whilst also delivering the much needed housing for the local area. Bearing in mind the existing heights on the Site, it is considered that a high-quality design, and assessment of local context and townscape impact, could result in development of up to 6-storeys being acceptable on the Site.

Loss of Employment Floorspace

The existing ZSC building is serviced occasionally by engineers so as to remain operational, but there are currently no fixed staff employed within this building. Furthermore, the BT Glasshouse is essentially vacant, with no ongoing employment servicing this building. As such, the existing building provides very little value in terms of employment offer. Furthermore, due to the niche use of the Site as a Switching Centre, it would not be easily converted for alternative employment uses. As such, TTG are exploring options for the demolition and redevelopment of the Site for non-employment generating uses.

TTG supports the aim of Policy EM3 which seeks to maintain the level of employment land in the Borough. The Site is not located within a Core Employment Area, and as such, it should be considered acceptable for the existing employment uses to be lost to provide for much needed housing. This is particularly relevant to this Site, as the local area is more suited to residential uses and has been

identified as an area in need of substantial housing growth. As such, it is considered that given the lack of employment generated from the existing use, that a new use which generated more housing would be welcomed by the Council.

Response to Questions in the Local Plan Partial Update Regulation 18 Consultation

Q27: Do you have any comments on the amount of housing that Reading should be planning for?

TTG agrees that the local housing need should be updated to 877 homes per year. Updating the policy to be representative of the true local need would help to encourage greater delivery of housing.

Q29: Do you agree with the proposed update to policy H2 to incorporate minimum densities?

TTG agrees that higher minimum densities should be set for different parts of the Borough. However, it must be made clear that these densities are a minimum, rather than a target to be met. It is important for development sites to be considered on a case-by-case basis and for development to be optimised, particularly on previously developed land in sustainable locations.

Q30: Do you agree with the proposed increased focus on family housing in policy H2?

TTG understands the importance of delivering family accommodation on development sites of over 10 homes however, requiring 67% of homes to be three-bedroom or more on sites outside of town centres may result in developments being unviable and undeliverable. There should be flexibility built into this policy to allow sites to be assessed on a case-by-case basis, taking into account viability, as well as the provision of other types of housing e.g. housing for older people and other planning benefits of the scheme.

Q37: Do you agree that we should update policy H6 as described?

TTG believes more clarity is needed on the intention of this policy and what type of housing for older people it applies to. Whilst Reading may consider that there has been an oversupply of Extra Care homes in recent years, evidence collected from advisors of TTG suggests that there is still significant demand from retirement operators in the Borough. Ultimately, we have an ageing population and the need to provide suitable, high quality accommodation for older people remains. As such, TTG consider that more work is needed to inform the updates to the policy.

Q72: Do you have any comments on the potential additional allocations to policy SR4?

TTG considers that in addition to the Sites already identified for allocation in the South Reading area, the Site which is the subject of this letter should be taken forward and considered for a site allocation, on the basis of the information included in this letter and the Call for Sites form.

Summary

In this letter, Iceni Projects have provided representations on behalf of TTG with regards to the Reading ZSC site at 11 Basingstoke Road, Reading. The main purpose of this letter is to make the council aware of this redevelopment opportunity and to promote the Site for Site Allocation within the Site Allocations Draft Plan. A number of sites which were suggested for allocation through the Council's Call for Sites exercise in 2023 are currently undergoing public consultation, as part of the Council's Local Plan Partial Update.

As set out in the letter, we feel a strong case can be made for this under-utilised brownfield Site to be allocated for a residential-led redevelopment, incorporating up to 220 residential units, with potential for a care home or housing for the elderly, to form part of the overall allocation, as well as improvements to the public realm. Such an allocation would assist in providing an additional site in the allocations for

housing, to help the Council meet its housing targets, which are expected to increase as part of the Local Plan Partial Update.

We consider that redevelopment of this Site would provide significant benefits and improvements to the local area. We would be very happy to discuss this opportunity further with the Council's Policy Team and work collaboratively with you to ensure the optimum use of this Site can be achieved in the medium to long term through the site allocation process.

TTG are committed to exploring development options on the Site and look forward to working with the Council to take forward these proposals in due course. If you have any further questions regarding the Site and TTGs interest, please do not hesitate to get in touch. Please contact myself in the first instance 07741 656 453 / abullough@iceniprojects.com , or my colleague Jack 07823 457 323 / miller@iceniprojects.com . We would like to be kept informed about future stages in the Local Plan making process and provided with any updates on the potential for site allocation as they emerge.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'A. Bullough'.

Ashleigh Bullough
Associate Director

READING BOROUGH LOCAL PLAN PARTIAL UPDATE CALL FOR SITES FORM

1. Introduction

- 1.1 Reading Borough Council is undertaking a Partial Update of the Reading Borough Local Plan. The existing Local Plan was adopted in November 2011 and sets out planning policies and proposals to guide decisions on planning applications up to 2036. There is a requirement for local authorities to review their Local Plans every five years, and a review carried out in March 2023 has identified a need to carry out a Local Plan Partial Update.
- 1.2 The Partial Update would include about half of the policies in the Local Plan. Importantly, it would include all policies that identify the overall level of development for uses such as housing and employment and almost all site allocation policies.
- 1.3 The first stage of this Partial Update process is that we are asking for sites to be nominated for inclusion in the updated Local Plan. These sites may be for a development for any use, a change of use or for another designation.
- 1.4 If you wish to nominate a site for inclusion, please complete the form attached. An online version can be found on the Council's website at [weblink]. Alternatively, completed forms can be returned to planningpolicy@reading.gov.uk.
- 1.5 If you wish to nominate more than one site, please complete a separate form for each site. There are separate forms for development/change of use and other designations.
- 1.6 Please note that the Partial Update process is intended to be a streamlined process that will lead to submission of the Plan to the Secretary of State by November 2024. Therefore, please do not assume that there will be further opportunities to nominate a site.
- 1.7 If a site is already allocated in the Local Plan and there is no proposal to change the allocation, you do not need to nominate it again through this process. Sites already allocated will be reviewed as part of the process in any case.
- 1.8 For development sites for housing, please note that we are not proposing to include sites within the Local Plan unless they can provide at least ten houses or flats. Similarly, we intend to use a cut-off of 1,000 sq m for commercial development. There are too many potential sites below this threshold to assess, and such sites would not on their own make a significant contribution to meeting Reading's housing needs. This will not prevent these sites being proposed for development through the planning application process.
- 1.9 If you need any assistance in filling out this form, please contact planningpolicy@reading.gov.uk
- 1.10 **Please ensure that you have submitted any nominations by 5pm on Friday 9th June 2023**

1. Call for sites form (development)

Please use this form to nominate a site for development or for a change of use of buildings.

Your details

1. Name: Jack Miller

2. Organisation if applicable : Iceniprojects

3. On behalf of if an agent or representing another person s : TT Group

4. Address: Da Vinci House, 44 Saffron Hill, London, EC1N 8FH

5. Telephone: 07823 457 323

6. E-mail address: miller@iceniprojects.com

Your address and contact details will be used solely for the purposes of preparing the Local Plan. It is required in order that the Planning Policy team of Reading Borough Council can contact site owners/proposers to discuss their specific site s . It will be kept in a specific contacts list set up for the purposes of this Plan. It will be retained for the period of Plan preparation and will not be disclosed to any third parties without your prior consent. The data will not be retained thereafter.

Site details

7. Site address including postcode if known : Reading Zone Switching Centre ZSC located at 11 Basingstoke Road, Reading, RG2 0EW

8. Are you the owner yes/no/part owner : Yes – the site is owned by Telereal Securitised Property GP Limited

The exception to this is the area highlighted in yellow on the Location Plan within the accompanying letter , which has been sold on a -year lease to Hart Housing Association.

If no, who is the owner : N/A

If no, do the owners, or other part owners, support your proposal yes/no/not known : N/A

<p>. If you are the owner, are you the freehold or leasehold owner : Freehold</p> <p>If leasehold, what is the remaining term on your lease :N/A</p>
<p>10. Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use if known yes/no/not known : N/A</p> <p>If so, please provide further detail: N/A</p>
<p>11. What is the size of the site in hectares :1. 3 hectares</p>
<p>12. What is the current land use of the site :BT Switching Centre / Telephone Exchange, with car parking</p>
<p>13. What is the proposed land use of the site if residential, please suggest how many dwellings the site could accommodate : C3 or C2 - 220 residential units with potential for a mixture of C3 and C2 space – the exact ratio would be confirmed during the application stage of any development</p>
<p>14. Has there been any recent market interest in the proposed use of the site yes/no/not known : There is local interest from retirement housing providers.</p> <p>If yes, please provide further details where possible: See above.</p>
<p>15. What is the likely timescale of the site becoming available during the plan period e.g. 1-5 years, 6-10 years, 11-15 years : 1-5 years</p>
<p>16. Is the site already allocated in a development plan yes/no : No</p> <p>If yes, and the proposed use is different, why do you consider that the allocation should be changed :N/A</p>
<p>17. Please provide any other information that you consider relevant to enable assessment of the candidate site e.g. constraints, contextual information, history of the site including current and past planning applications with reference numbers where available : Please see accompanying letter for further information.</p>
<p>18. Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. Please note that this is essential, as sites cannot be considered without clarity about the boundaries. Please see title plan included within letter accompanying this submission.</p>

2. Call for sites form (other designation)

Please use this form to nominate a site for a designation other than development or change of use.

Your details

1. Name: answer

2. Organisation if applicable : answer

3. On behalf of if an agent or representing another person s : answer

4. Address: answer

5. Telephone: answer

6. E-mail address: answer

Your address and contact details will be used solely for the purposes of preparing the Local Plan. It is required in order that the Planning Policy team of Reading Borough Council can contact site owners/proposers to discuss their specific site s . It will be kept in a specific contacts list set up for the purposes of this Plan. It will be retained for the period of Plan preparation and will not be disclosed to any third parties without your prior consent. The data will not be retained thereafter.

Site details

7. Site address including postcode if known : answer

8. Are you the owner yes/no/part owner : answer

If no, who is the owner : answer

If no, do the owners, or other part owners, support your proposal yes/no/not known : answer

. If you are the owner, are you the freehold or leasehold owner : answer

If leasehold, what is the remaining term on your lease : answer

10. Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use if known yes/no/not known : answer

If so, please provide further detail: answer

11. What is the size of the site in hectares : answer

12. What is the current land use of the site : answer

13. What is the suggested designation of the site : answer

14. Is the site already allocated in a development plan yes/no : answer

If yes, and the proposed use is different, why do you consider that the allocation should be changed : answer

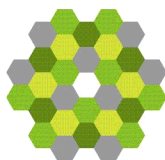
15. Please provide any other information that you consider relevant to enable assessment of the candidate site e.g. constraints, contextual information, history of the site including current and past planning applications with reference numbers where available : answer

16. Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. Please note that this is essential, as sites cannot be considered without clarity about the boundaries.

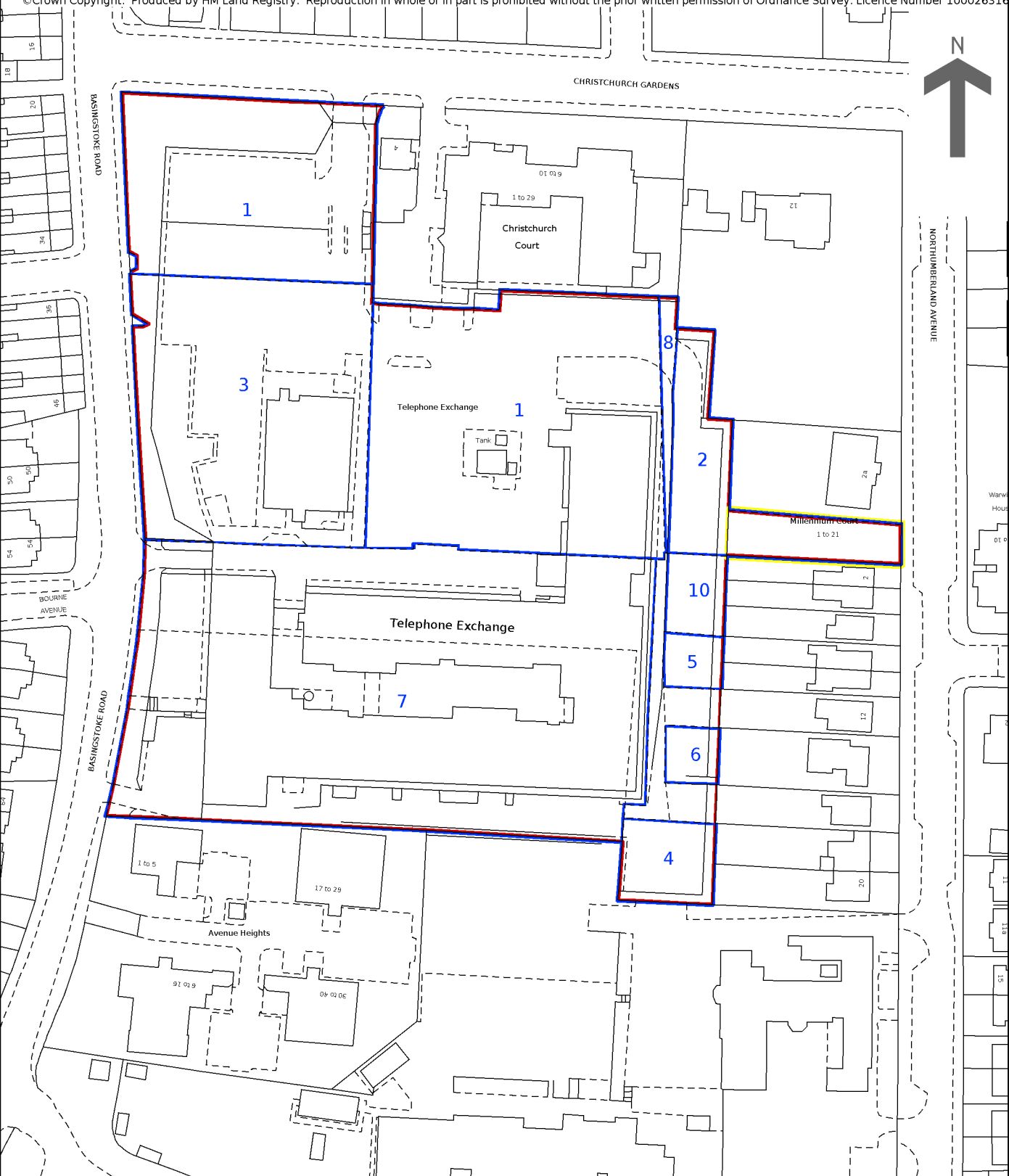
HM Land Registry

Current title plan

Title number **BK376169**
Ordnance Survey map reference **SU7271NW**
Scale **1:1250**
Administrative area **Reading**



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This title is dealt with by HM Land Registry, Gloucester Office.

SR4k: Former Sales and Marketing Suite, Drake Way

From: james@mcconnellplanning.co.uk
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-522361079
Date: 08 June 2023 09:37:40
Attachments: [Site location plan.pdf](#)

Name: james@mcconnellplanning.co.uk

Organisation (if applicable): McConnell Planning

On behalf of: Elstree Land

Telephone: 07985986378

Email address: james@mcconnellplanning.co.uk

Site address: Former Sales and Marketing Suite, Drake Way, Kennet Island, RG2 0GQ

Are you the owner: No

Who is the owner?: Berkeley Group

Do the owners, or other part owners, support your proposal?: Not known

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: No

What is the size of the site in hectares?: 0.26

What is the current land use of the site?: Vacant. The three storey building on the site was previously the sales and marketing suite for the Kennet island residential development constructed by the Berkeley Homes.

What is the proposed land use of the site?: Residential. The site can accommodate 23 units.

Has there been any recent market interest in the proposed use of the site?: Not known

What is the likely timescale of the site becoming available during the plan period?: 1-5 years

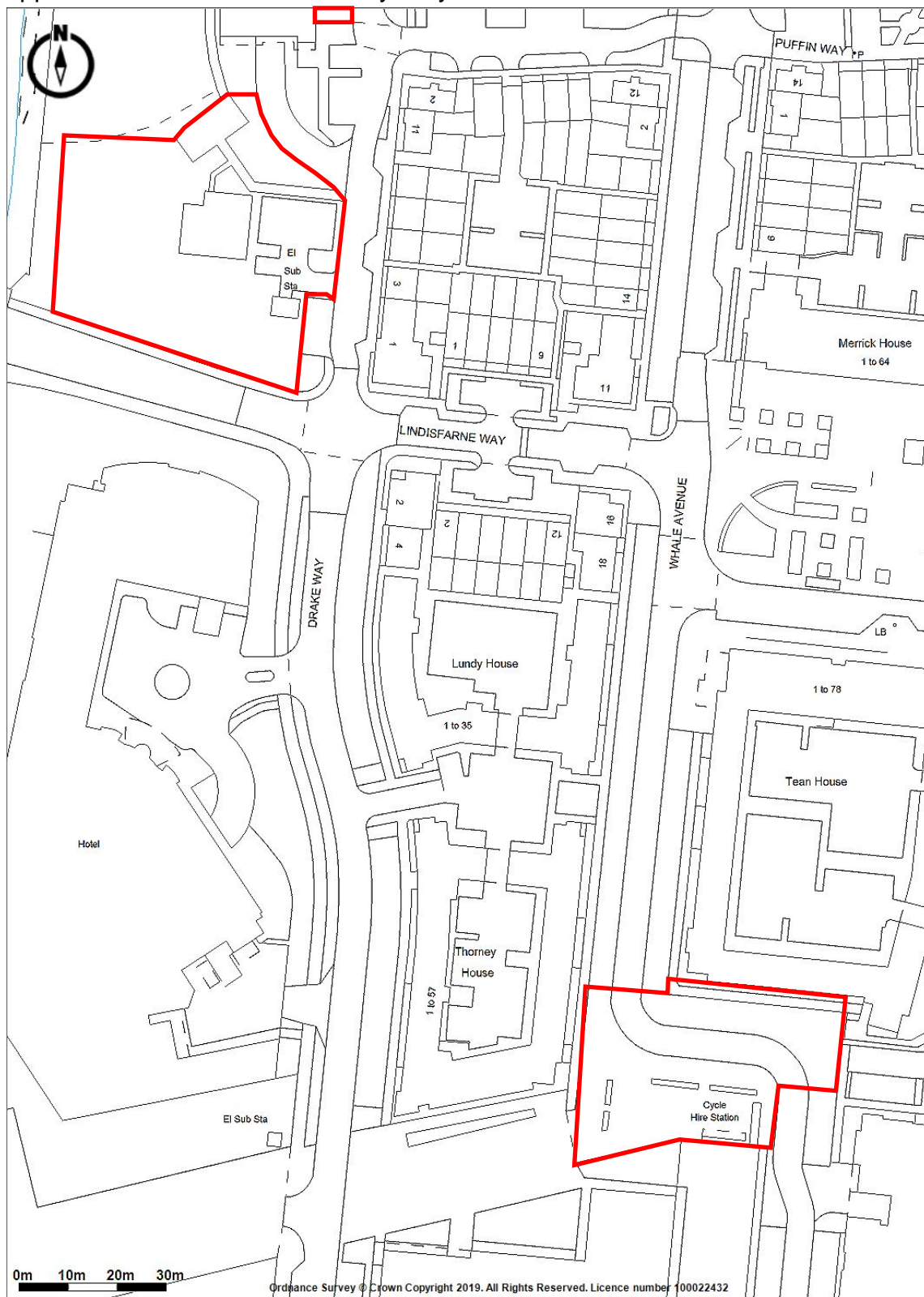
Is the site already allocated in a development plan?: No

Please give any other information that you consider relevant to enable assessment of the candidate site: The existing three storey building on the site was granted temporary planning permission (ref 1306230) on 24 June 2013 for a 6 year period. Planning permission was subsequently granted (ref 180543) on 23 September 2019 for the construction of 12 flats. This permission was not implemented and has now expired. The site has been the subject of pre-application discussions between Elstree Land and the Council for residential re-development with pre-application advice (ref 220632/PREAPP) received for a proposed development of 33 flats. The advice concluded that the proposed development, whilst acceptable in principle, would not allow for a suitable landscaped setting and would result in an overly dominant form of development. Following that advice a scheme for 23 units was prepared by the applicant and submitted to the Council to address the concerns raised. This scheme is considered to respond satisfactorily to the

concerns raised and is a reasonable estimate of the site capacity. To conclude, both the planning history and pre-application advice establish that there is scope for a residential development in excess of 10 units on this brownfield site. it is therefore appropriate to include the site as a residential allocation in the Local Plan Review. Furthermore, a suggested capacity of 23 units is considered to be a reasonable estimate of the site capacity.

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : Site location plan.pdf

Site Location Plan:
App Ref 180543 Kennet Island Marketing Suite; and
App Ref 190308 Land off Rushley Way



WR3u: 132-134 Bath Road

From: [Jonathan Walton](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-522429640
Date: 08 June 2023 12:33:12
Attachments: [Bath Road Reading - Planning Summary_070623.pdf](#)

Name: Jonathan Walton

Organisation (if applicable): Opus Works

On behalf of: British Estate Services Ltd

Telephone: 07768968030

Email address: jonathan.walton@opus.works

Site address: Land at 132 - 134 Bath Road, Reading, RG30 2EU - land split between four title deeds: BK54, BK898, BK1049, BK1473

Are you the owner: Yes

Are you a freehold or leasehold owner?: Freehold

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: Yes

Please give details of these agreements or covenants: On-site uses under short-term lease agreements (example attached)
SSE wayleave on site

What is the size of the site in hectares?: 0.5

What is the current land use of the site?: Part-vacant and E Class uses

What is the proposed land use of the site?: Mixed-use residential and E class uses

Has there been any recent market interest in the proposed use of the site?: Yes

Please provide further details of the recent market interest: Confidential, can be supplied as needed

What is the likely timescale of the site becoming available during the plan period?: 1-5 years

Is the site already allocated in a development plan?: No

Please give any other information that you consider relevant to enable assessment of the candidate site: Please see attached Planning Summary Note, includes Site Location Plan and example short-term lease agreement detail

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : Bath Road Reading - Planning Summary_070623.pdf



**Land at 120 – 134 Bath Road,
Reading, RG30 2EU**

Call for Sites Submission, June 2023

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3.	The Proposed Development	6
4.	Planning Analysis	7
5.	Summary and Conclusions	10

Contact

Jonathan Walton

jonathan.walton@opus.works

June 2023



1. Introduction

- 1.1 This planning summary has been prepared to assist site considerations at land off Bath Road, Reading, hereinafter referred to as 'The Site'.
- 1.2 The client owns the freehold of a predominantly commercial and industrial site that is located within a mixed-use area adjacent to residential and educational uses and land. A residential property directly to the west of the main site entrance is also within the client's ownership.
- 1.3 The site is located within the Borough boundary on a major thoroughfare with good access to a range of local services at the Meadway. Local schools and Prospect Park are also within easy walking distance. As such, the site is highly sustainable and benefits from a presumption in favour of sustainable development.
- 1.4 The site is self-contained with significant, existing screening in place along the site perimeter.
- 1.5 The site is within the administrative boundaries of Reading Borough Council. The Development Plan currently comprises the Reading Local Plan 2011 and connected Supplementary Planning Documents covering *inter alia* employment uses, affordable housing and sustainable design and construction.



2. Background to the Application Site and Planning Policy Context

Policy Context

Proposals Map

- 2.1 The red lines outside of the site identify local cycle routes and the yellow lines denote location adjacent to the classified highway network. The site is located within an Air Quality Management Area (AQMA) as denoted by the dark red line to the north of the site. A red line identifies the site boundary. Adjacent land at 134 Bath Road is also within the client's ownership and is identified by a blue line. This land is also available for redevelopment if considered appropriate in terms of improving access and creating greater delineation between on-site uses.



- 2.2 As set out on the proposals map, there are no site specific designations.
- 2.3 Detail of relevance to any emerging proposals on site is principally set out in policies EM3 and EM4, which seek to retain employment uses, as well as the 'H' policies of the Local Plan which govern residential development.

Other Policy, Legislative Considerations and Planning History

- 2.4 The site is located in Flood Zone 1 where there is the lowest risk of flooding.



- 2.5 Review of the Historic England asset map identifies no heritage assets that would be unduly affected should redevelopment proposals come forward.
- 2.6 As noted above, the site falls within the extent of the Reading AQMA. In this respect, full consideration of window openings, balcony provision and internal air quality of units will need to be explored and agreed with the Council's Environmental Health Officer as part of scheme development, this also taking into consideration potential on-site E Class uses.
- 2.7 Given significant tree screening in place at the site perimeter, careful planning will be required to ensure retention of mature, high-quality species, alongside proposals to ensure biodiversity net gain and increased canopy cover in line with the Council's Climate Change policies and Biodiversity Action Plan.



3. The Proposed Development

Site Opportunities and Constraints

- 3.1 The site is currently occupied, but in terms of land-take versus potential for redevelopment, it is contended that it does not represent an efficient or optimal use of land, particularly given significant vacant land in the north and west of the site.
- 3.2 Short-term leases are in place across the site to enable redevelopment to come forward in a manner considered appropriate by the Council.
- 3.3 There is good potential to optimise the value of the site, as it is self-contained, set back from the road's edge and has existing access that can be widened as necessary to accommodate traffic flows. It is noted that existing uses on site contribute to significant car movements and parking and therefore opportunity exists to reduce overall traffic movements associated with the site.
- 3.4 Given existing screening and the current subdivision of uses on site, it is currently possible to use existing vacant land for residential development, whilst keeping existing E Class uses untouched.
- 3.5 It is considered, however, that there currently is a lack of a controlled, safe vehicular and pedestrian route to the potential residential land, which would be equally difficult to implement without loss of existing businesses along that route. In addition, the vacant land is currently required for parking associated with the car repair and print businesses and this could not be adequately provided given lack of available space within other areas of the site.
- 3.6 Accordingly, wholesale redevelopment offers greater opportunity to rationalise development on site and enable residential and commercial buildings to come forward in a manner that can complement each other whilst protecting internal and external amenity.
- 3.7 Overall, it is considered that an opportunity exists to redevelop the site to make a more efficient use of the available land. The site can be developed either for residential uses or a mixed-use scheme and can be brought forward either in its entirety or in phases, given vacant land on site and its self-contained nature.



4. Planning Analysis

Overview

- 4.1 The site is located within the Borough boundary and is in a highly sustainable location which benefits from excellent access to services, amenities and public transport. In the immediate locale are a number of local shops and convenience retailers.
- 4.2 Employment opportunities and additional services are available within the local centres of Meadway, Tilehurst and Calcot, as well as Reading Town Centre, all of which are easily accessible, as are other employment areas that are commutable by rail and bus. A strategic bus route runs via the site on Bath Road providing connections to all local areas and there are also good cycling links to/from the site to the town centre. The site is therefore highly sustainable and proposals for a mixed-use commercial and residential scheme would therefore be consistent with Policies H1 and EM3/4 of the Local Plan.
- 4.3 The proposals will result in the redevelopment of an existing commercial and light industrial site, which is occupied by buildings which are inefficient in nature, are less fit for purpose, provide little architectural or visual merit and which do not optimise the site. A proposed change of use to a mixed-use E Class and residential scheme would help meet the Council's aspirations to deliver more housing and affordable housing, whilst retaining employment and providing higher-specification premises to retain and attract business.
- 4.4 It is considered that a mixed-use redevelopment can be consistent with the general thrust of policy, particularly if the loss of existing E Class uses can be satisfactorily offset through provision of more resilient, flexible and fit for purpose accommodation within the project scheme.
- 4.5 Due to the self-contained nature of the scheme and available screening, it is considered that some three/four storey residential elements could be provided towards the rear of the site, with built form reducing in scale towards Bath Road. Careful consideration will be given to ensure that parking and amenity space requirements can be met and further technical due diligence will be undertaken in this regard should the site be identified as holding redevelopment potential.
- 4.6 Provision of high-specification E Class uses adjacent to the petrol station appears appropriate in terms of juxtaposition, with this element of the redevelopment helping to provide a split in proposed uses and also a more welcoming, dual-purpose entrance to the mixed-use site.
- 4.7 Use of landscaping and screening, as appropriate, can be implemented to create a greater delineation between on-site uses.

Technical Considerations

- 4.8 Given the presence of adjacent residential and commercial buildings, careful consideration will be given to layout, scale and massing as part of initial due diligence. A Daylight and Sunlight Report will also be required in light of adjacencies and significant on-site screening to ensure that the proposals do not unacceptably impinge on surrounding amenity, as well as ensuring that internal daylight requirements are met.



4. A suite of supporting documentation to underpin the various aspects of the proposals will also be required, this being as identified in the November 2021 Validation Checklist. Planning requirements will be discussed and agreed with the Council prior to any submission.

Potential Benefits

Environmental

- 4.10 The application proposals will result in the rejuvenation of under-utilised, heavily hardscaped land, allowing for more sensitively designed, environmentally beneficial mixed-use development to come forward.
- 4.11 The application site is situated within the Borough boundary and is in a highly sustainable location. A wide range of retail and other facilities are located in the vicinity of the site and a bus stop, serving a strategic bus route, is located in the immediate locale. The accessibility of the site ensures the rail network, as well as services, employment and leisure opportunities found in Reading Town Centre are easily reachable via excellent public transport and cycle links.

Economic

- 4.12 During the construction phase a number of FTE construction jobs will be sustained directly¹, with additional jobs being sustained or created through expenditure in the supply chain. It is also relevant that the predominance of jobs sustained during the construction phase will be filled by people living in Reading area and wider region². Measures to directly employ a localised labour force, as well as a number of local sub-contractors will ensure that a greater proportion of salaries and expenditure, arising from the construction phase, is retained in the local economy in line with the Council's Economic policy.
- 4.13 Economic benefits also continue during the post-construction phase. The proposed development will result in the rejuvenation of an under-utilised commercial floorplate to provide new purpose-built E Class uses and a range of dwellings. The future occupiers of the completed homes and businesses will patronise local shops and facilities, and in so doing contribute to the viability and vitality of businesses in Bath Road, the Meadway and other local centres, as well as Reading.
- 4.14 In addition, the operational benefits and spinoffs accrued through new E class uses will provide a strong source of GVA income to the Borough. It is advised that any planning application is supported by an Economic Analysis and Floorspace Assessment to clearly demonstrate the benefit in redeveloping the current buildings.

Social

- 4.15 The provision of high-quality and well-designed dwellings will provide direct amenity benefits for future residents and will also help to raise the quality of the local housing stock. Meeting Reading's housing need is a clear priority for the Borough and the provision

¹ Based on research presented on the report 'The Labour Needs of Extra Housing Output: Can the House building Industry Cope?' (HBF, 2005).

² Based on a relatively high degree of self-containment in the local construction labour market see ONS 2011 Census 2011 – 'Location of usual residence and place of work')



of a range of house sizes and tenures will help address identified overall and affordable housing requirements over the local plan period.

Other Considerations

Parking and Highways

- 4.16 The site is currently heavily occupied by cars either owned by employees or there for car repair. There is no formalised parking or provision of EV charging. As such, opportunity exists to reduce overall car parking and movement associated with the site, whilst enabling electric charging for business and residential users in line with the Council's wider sustainability aspirations.

Design

- 4.17 As described in the previous sections of this report, the proposed development will make effective use of an under-utilised mixed-use site.
- 4.18 The proposal will introduce a significant number of dwellings of varying mix and tenure, as well as fit for purpose E Class uses. Careful design and consideration of scale and massing can ensure the resultant development responds well to the character of the local area and the properties in the immediate vicinity.
- 4.1 The new build can help to provide meaningful visual uplift to the site, which is dilapidated in nature and offers little in the way of visual merit.
- 4.20 From initial technical review, it is considered that the site can comfortably accommodate a significant quantum of residential development alongside complementary E Class uses, although it is noted that discussions with the Council's technical officers will be required to fully assess and understand appetite for development, including appropriate commercial, retail and industrial uses.
- 4.21 Should the Council consider that the redevelopment proposals for the site have initial merit, it is the intent of the client to undertake technical and environmental due diligence prior to commencement of meaningful pre-application engagement with the Council to enable a well-considered scheme to emerge.

Air Quality

- 4.22 The application site falls within the boundary of the AQMA as defined in the Proposals Map. In accordance with Policy EN15 of the Local Plan, the effects of the AQMA can be mitigated through improvements to existing built form, reduction in the amount of cars utilising the site, provision of EV Charging, increased canopy cover and other biodiversity net gain planting.



5. Summary and Conclusions

- 5.1 This summary note has been prepared to consider the potential for residential and commercial uses at land off Bath Road, Reading as part of the Local Plan Review.
- 5.2 As demonstrated in preceding paragraphs, the site is in a sustainable location within walking distance of shops and other amenities and is adjacent to a strategic bus route providing services that run regularly into Reading Town Centre and the surrounding area.
- 5.3 The various scheme aspects proposed can provide a sustainable development, which can come forward in a manner that sensitively responds to the opportunities and constraints associated with the site and its surrounding context.
- 5.4 The site is currently under-utilised and the proposed development would make excellent use of previously developed land to deliver much-needed housing and a range of E Class uses.
- 5.5 The client is open to discussing its plans with the Council further as needed to assist consideration of the merits of this submission.

Opus Works Group Limited

Gardenia House
Church Lane
Ewshot
GU10 5BJ

Registered in England, no: 13706668. Registered Office: 27 Old Gloucester Street, London, WC1N 3AX

<https://opus.works> info@opus.works

T: 0118 343 4217
E: planning@opus.works



Land at 132 - 134, Bath Road, Reading, RG30 2EU



Location Plan shows area bounded by: 468239.22, 172089.22 468439.22, 172289.22 (at a scale of 1:1250), OSGridRef: SU68337218. The representation of a road, track or path is no evidence of a right of way. The representation of features as lines is no evidence of a property boundary.

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DATED

31st DECEMBER

2019

BRITISH ESTATE SERVICES LIMITED

and

Counterpart/

LEASE

relating to Unit . . . at 132 Bath Road,
Reading, Berkshire.
(in Building)

THIS LEASE made the 31st day of DECEMBER 2019

BETWEEN BRITISH ESTATE SERVICES LIMITED of 132 Bath Road Reading Berkshire RG3 2EU (hereinafter called "the Landlord") which expression shall where the context so admits include the persons for the time being entitled to the reversion immediately expectant on the determination of the term hereby created of the one part and

... (hereinafter called "the Tenant") which expression where the context so admits include its successors in title of the other part

WITNESSETH as follows:

- 1.1 In this Lease "the Building" shall mean the building known as 132 Bath Road Reading and "the Estate " shall mean the land surrounding the Building and edged blue on the plan (but not including the Building) and "Service Charge" means in relation to the demised premises 23.23% of the cost to the Landlord of carrying out the Landlord's obligations under clauses 3.1 and 3.2 of this Lease but not exceeding £500 in any calendar year
- 1.2 IN consideration of the rent hereinafter reserved and of the covenants on the part of the Tenant hereinafter contained the Landlord hereby demises unto the Tenant ALL THOSE premises (hereinafter called "the First Demised Premises") described in the First Schedule TOGETHER with the rights specified in the Second Schedule hereto in common with the Landlord and all others entitled thereto EXCEPTING AND RESERVING unto the Landlord and all others authorised by the Landlord as specified in the Third Schedule hereto TO HOLD the same unto the Tenant for a term expiring on the 31st July 2023 terminable as hereinafter mentioned) commencing on the 1st of January 2020 paying unto the Landlord the yearly rent of TWELVE THOUSAND POUNDS (£12,000) exclusive of

Value Added Tax the Rents and Service Charge shall be paid by equal monthly payments in advance by bankers' order or if so reasonably required by the Landlord on the first day of each calendar month without any deduction.

2. THE Tenant hereby covenants with the Landlord as follows:-

2.1 To pay the said rents to the Landlord at the times and in manner aforesaid clear of all deductions and if any rent or other monies whatsoever payable hereunder shall have become due but remain unpaid for fourteen days to pay on written demand to the Landlord interest thereon at the rate of four per cent per annum over the Base Rate for the time being of National Westminster Bank PLC from the date upon which the same became due until payment thereof

2.2 To pay to the Landlord the interim initial Service Charge and the Service Charge as provided for in clause 4(5) of this Lease and reimburse the Landlord the appropriate proportion of the annual buildings insurance premium.

2.3 To pay all taxes charges assessments outgoing and impositions whatsoever which now are or shall at any time hereafter during the said term be charged assessed or imposed upon or in respect of the demised premises or any part thereof or on the Landlord or Tenant in respect thereof but not so as to include any resulting from or arising on a dealing in or disposition of any interest in the demised premises reversionary to that hereby granted

2.4 To repair and keep in good repair and condition and reasonably decorated (where appropriate) using suitable materials of good quality the whole of the demised premises and every part and the Landlord's fixtures therein

and the drains pipes wires serving solely and situated within the demised premises and to keep and maintain the demised premises in a neat and tidy condition and clear of all rubbish and to repair forthwith all physical damage caused during the period of this Lease to the demised premises or the Landlord's fixtures and fittings therein (except in so far as the same is covered by the Landlord's insurance policy) and in the last three months of the term to redecorate all previously decorated internal surfaces in a professional manner in colours to be determined by the Landlord's surveyor .

- 2.5 To permit the Landlord or the Landlord's duly authorised agents at all reasonable times during the said term and upon giving the Tenant reasonable prior written notice of his intention to do so (except in the case of emergency) with or without workmen or others to enter upon the demised premises or any part thereof to view the state of repair and condition thereof and to give or leave on the demised premises notice in writing addressed to the Tenant of all defects and wants of reparation which are the responsibility of the Tenant then and there found and the Tenant shall and will within a period of three calendar months after such notice (or sooner in case of emergency) repair and make good the same according to such notice and the covenant in that behalf hereinbefore contained and if the Tenant shall fail so to do the Tenant shall permit the Landlord to enter upon the demised premises for the purpose of carrying out such repairs and the proper cost thereof shall be repaid by the Tenant to the Landlord forthwith upon written demand
- 2.6 To permit the Landlord or the Landlord's duly authorised agents and the tenants of adjoining or neighbouring units of the Building with or without workmen or others at all reasonable times during the said term to enter

upon the demised premises or any part thereof for the purposes of carrying out repairs to the demised premises for which the Tenant is not responsible or to the adjoining or neighbouring premises of the Landlord PROVIDED THAT the Landlord shall give not less than forty eight hours written notice of his intention to exercise his right (except in case of emergency) and shall cause as little inconvenience to the Tenant as is reasonably practicable and forthwith make good all damage caused to the Demised Premises and the Tenant's fixtures fittings and chattels

- 2.7 Not at any time during the said term to make any alterations or additions to the demised premises or any part thereof other than such non-structural alterations or additions as the Landlord shall approve in writing (such approval not to be unreasonably withheld)
- 2.8 To use the demised premises for the fitting of tyres onto motor vehicles and the repairing or refurbishing of vehicle wheels or subject to obtaining the Landlords prior written approval which shall not be unreasonably withheld or delayed any other general industrial use that does not conflict with another use already being or about to be carried out on the Estate notwithstanding the Use of the premises for the mechanical repair of motor vehicles, sale or auction of motor vehicles, vehicle washing or vehicle bodywork repair is expressly prohibited.
- 2.9 To pay to the suppliers thereof all charges for electricity gas and water (including meter rents if any) consumed in the demised premises
- 2.10 To provide at the Tenant's expense such fire fighting equipment as may be required in order to comply with fire regulations and not knowingly to do or permit or suffer to be done on the demised premises anything which may cause any insurance of the demised premises or any other part of the estate effected by the Landlord to be or become vitiated or whereby the

premium payable under any such insurance is liable to be increased

- 2.11 In the event of the demised premises or the Building or any part thereof being damaged or destroyed by fire at any time during the term hereby granted and the insurance money under any policy of insurance effected thereon by the Landlord being wholly or partially irrecoverable by reason solely or in part of any negligent act or default of the Tenant the Tenant will forthwith in addition to the said rents pay to the Landlord the whole or as the case may be a fair proportion of the costs of rebuilding and reinstating the same and any dispute as to the proportion to be so contributed by the Tenant to be referred to arbitration in accordance with the provisions of the Arbitration Act 1996 or in any statutory modification or re-enactment thereof for the time being in force
- 2.12 Not to use or permit or suffer to be used the demised premises or any part thereof for any illegal or immoral purpose and not to do or cause or permit or suffer to be done on the demised premises or any part thereof anything which may be or become a nuisance or annoyance or which may cause damage to the Landlord or to the occupiers for the time being of the Building or the Estate or any adjoining or neighbouring land PROVIDED THAT the use of the demised premises for the user herein permitted shall not be deemed to be a cause of any such nuisance or annoyance
- 2.13 Not to erect or display or permit to be erected or displayed any advertisements hoardings or notices upon the exterior of the demised premises or any part of the demised premises which shall be visible from the exterior without the prior written approval of the Landlord.

2.14 To comply with the following further Covenants

- 2.14.1 Not to fix or place upon or suffer to be fixed or placed upon the demised premises any machinery article or substance which in the reasonable opinion of the Landlord may be liable to cause damage to the demised premises or the Estate or any adjoining or neighbouring buildings
- 2.14.2 Not to overload the floors of the demised premises
- 2.14.3 Not to make any alterations to the electrical installation without using a suitably qualified electrician and to supply the Landlord with a copy of the relevant Certification required
- 2.14.4 To reimburse the Landlord upon demand the annual premium for insuring the Demised Premises and any loss of rent period
- 2.14.5 To install and use all tenants fixtures and fittings in accordance with the Manufacturer's recommendations and to provide written confirmation to the Landlord upon request.

2.15 ALIENATION

The Tenant covenants with the Landlord:

2.15.1 Restrictions on alienation

The Tenant shall not:

- 2.15.1.1 save to the extent permitted by the following sub-clauses of this clause, part with possession of the whole or any part of the Premises or part with or share occupation of the whole or any part of the Premises or permit occupation by a licensee of the whole or any part of the Premises or hold on any trust the whole or any part of the Premises; nor

2.15.1.2 if it is an unlimited company incorporate itself as a limited company without the prior consent of the Landlord (such consent not to be unreasonably withheld)

2.15.2 Assignment

The Tenant shall not:

2.15.2.1 assign part of the Premises; nor

2.15.2.2 assign the whole of the Premises without the prior consent of the Landlord which (subject to sub-clauses 2.15.3 and 2.15.4) shall not be unreasonably withheld

2.15.3 Agreement as to circumstances

The Landlord and the Tenant agree that the Landlord may withhold its consent to an assignment if any one or more of the following circumstances (which are specified for the purposes of Section 19(1A) of the Landlord and Tenant Act 1927) exist and it shall not be regarded as unreasonably withholding its consent if it does so:

2.15.3.1 any Rent due from the Tenant under this lease is unpaid;

2.15.3.2 the Landlord reasonably determines that the proposed assignee is not a person who is likely to be able both to comply with the tenant's covenants in this lease and to continue to be such a person following the assignment;

2.15.3.3 the Landlord reasonably determines that the proposed assignment may have a materially adverse effect on the value of the Landlord's reversionary interest in the Premises;

2.15.3.4 the proposed assignee or any proposed guarantor for it (other than any guarantor under an Authorised Guarantee Agreement) has the benefit of state or diplomatic immunity or the Landlord reasonably determines that it is likely to acquire that immunity;

- 2.15.3.5 the proposed assignee is a company which is a member of the same group (within the meaning of Section 42 of the Landlord and Tenant Act 1954) as the Tenant
- 2.15.3.6 the proposed assignee or any proposed guarantor for it (other than any guarantor under an Authorised Guarantee Agreement (and (for the avoidance of doubt) such exception also applies to clauses 2.15.3.7 and 2.15.3.8) is a corporation registered in or an individual resident in a jurisdiction in which a judgement obtained in the courts of England and Wales will not necessarily be enforced without any re-examination of the merits of the case.
- 2.15.3.7 (where the proposed assignee or guarantor is a limited company) the proposed assignee's (or the proposed guarantor's) audited accounts in each of its last three immediately preceding accounting periods (the beginning of accounting period for the most recent of such accounts being not more than 18 months prior to the date of the relevant application) show a profit before taxation of less than three times the rents then reserved by this lease and the assignee or the guarantor (as the case may be) is unable to provide additional security reasonably acceptable to the Landlord
- 2.15.3.8 where in the reasonable opinion of the Landlord there are any material outstanding breaches of any tenants' covenant relating to the state and condition of the Premises.
- 2.15.3.9 the proposed assignee's (or the proposed guarantor's) net assets as evidenced as before in such audited accounts (from which there is excluded any amount in respect of deferred tax) are in each of the three immediately preceding accounting periods as aforesaid of an

amount representing less than the aggregate of ten times the rents then reserved by this lease and the assignee or the guarantor (as the case may be) is unable to provide additional security reasonably acceptable to the Landlord

2.15.4 Agreement as to conditions

The Landlord and the Tenant agree that the Landlord may grant consent to an assignment subject to any one or more of the following conditions (which are specified for the purposes of Section 19(1A) of the Landlord and Tenant Act 1927) and it shall not be regarded as giving consent subject to unreasonable conditions if it does so:

- 2.15.4.1 that before the assignment the Tenant enters into and unconditionally delivers to the Landlord an Authorised Guarantee Agreement (such agreement to be a deed and to contain the provisions in the Fourth Schedule or (at the Landlord's absolute discretion) such other provisions as the Landlord shall reasonably prescribe and (in either case) such ancillary provisions as the Landlord shall reasonably prescribe)
- 2.15.4.2 that all Rent due from the Tenant under this lease as at the date of the assignment has been paid;
- 2.15.4.3 that if the consent of any superior landlord is required to the assignment that consent has been obtained before the assignment; and
- 2.15.4.4 that the assignment is completed and registered with the Landlord in accordance with sub-clause 2.15.14 within three months of the date of the consent and if it is not the consent shall be void

2.15.5 Further agreement

The Landlord and the Tenant agree that:

- 2.15.5.1 the Landlord may withhold consent to an assignment in circumstances which are not referred to in sub-clause 2.15.3 if it is reasonable to do so and may grant consent subject to conditions which are not specified in sub-clause 2.15.4 if the conditions are reasonable; and
- 2.15.5.2 any power on the part of the Landlord to determine any matter for the purposes of sub-clauses 2.15.3 or 2.15.4 shall be exercised reasonably

2.15.6 Charging

The Tenant shall not:

- 2.15.6.1 charge part of the Premises; or
- 2.15.6.2 charge the whole of the Premises without the prior consent of the Landlord which shall not be unreasonably withheld.

2.15.7 Registration of dealings

Within 14 days of every assignment transfer or charge of the Premises or the creation or transfer of any interest derived out of the Term or any devolution of the interest of the Tenant or any person deriving title under the Tenant the Tenant shall produce a certified copy of the assignment transfer underlease or charge or (in the case of a devolution) the document evidencing or under which the devolution arises and pay the Landlord a registration fee of in respect of each assignment transfer underlease charge or devolution

- 2.16 During the last six months of the said term to permit the Landlord to affix to any part of the demised premises and there to retain without interference a notice that the same are to be let PROVIDED that such

notice shall not obstruct any of the windows doors or accessways to the demised premises and to permit all persons bearing written authority from the Landlord to enter upon the demised premises to inspect the same at all reasonable times of the day and by appointment on not less than 48 hours notice

- 2.17 Not at any time during the said term to cause any damage to or obstruction in any part of the Estate or the Building not included in the demised premises and in particular but without prejudice to the generality of the foregoing provision not to obstruct access over any yard or driveway on the Estate (provided that parking in accordance with the provisions of this Lease shall be deemed not to be such obstruction) and so far as it is within the reasonable control of the Tenant to prevent parking by the Tenant's servants agents or visitors on any part of the Estate other than as expressly permitted by this Lease or otherwise permitted by the Landlord
- 2.18 At the Tenant's expense to comply with all statutory requirements in relation to the use of the demised premises by the Tenant or any undertenant and every order notice requisition direction or other thing given made or issued by a competent authority affecting the demised premises by the Tenant or any undertenant or the user of the demised premises whether the same is addressed to or served upon the Landlord or the Tenant or any other person whatsoever (PROVIDED however that the Tenant shall have no liability in respect of any such matter unless and until it has had a copy of the notice or other matter or has been made aware of the contents thereof (as the case may be) and a reasonable opportunity to comply with the same) and to indemnify the Landlord against all proper costs expenses and liabilities in respect thereof and to supply the Landlord promptly with copies of any such documents received by the Tenant

- 2.19.1 To pay all proper expenses including Solicitors costs and surveyors fees incurred by the Landlord incidental to the preparation and the service of a notice under Section 146 of the Law of Property Act 1925 notwithstanding forfeiting is avoided otherwise than by relief granted by the Court
- 2.20 At the determination of the term hereby granted to remove all items belonging to the Tenant and all rubbish from the demised premises and to yield up the demised premises to the Landlord in the state of repair and condition in which they ought to be in accordance with the tenants covenants contained herein
- 2.21.1 Where by virtue of any of the provisions of this Lease the Tenant is required to pay repay or reimburse to the Landlord or any person or persons any rent premium cost fee charge insurance premium expense or other sum or amount whatsoever in respect of the supply of any goods and/or services by the Landlord or any other person or persons the Tenant shall also be required in addition to pay:
- 2.21.1.1 the amount of any Value Added Tax which may be chargeable in respect of such supply to the Tenant;
- 2.21.1.2 a fair proportion of the amount of Value Added Tax chargeable by any other person (or chargeable by the Landlord in the case of supplies which the Landlord is deemed to make to itself) in respect of supplies the cost of which is included in the calculation of the sums which the Tenant is required to pay repay or reimburse to the Landlord save to the extent that such Value Added Tax is recoverable by the Landlord

For the avoidance of doubt the Landlord shall be under no duty to exercise or not exercise any option or right conferred on the Landlord by the legislation relating to Value Added Tax (including any regulations made

thereunder) so as to reduce or avoid any liability to Value Added Tax referred to in (i) or (ii) above

2.22 To provide to the Landlord on demand and in writing the name and address of all persons holding a key for the main gate to the Estate.

2.23 To inform the Landlord in writing of any change of address in the Tenant's place of residence.

3. SUBJECT to the Tenant paying to the Landlord the Service Charge and complying with the Tenant's covenants and other terms of this Lease the Landlord hereby covenants with the Tenant as follows:-

3.1.1 Throughout the said term to keep the demised premises insured against loss or damage by fire lightning explosion storm tempest flood bursting and overflowing of water tanks apparatus or pipes impact from aircraft and other aerial devices and any articles dropped therefrom earthquake riot civil commotion strikes locked out workers and malicious persons subject to such risks being insurable and other such risks as the Landlord shall reasonably consider necessary in some insurance office of repute to the full reinstatement value of the demised premises and including the loss of two years rent the costs of architects and surveyors fees and demolition and removal of debris

3.1.2 To produce to the Tenant within seven days of demand the policy of such insurance and reasonable evidence from the insurers that the policy is subsisting and in effect but only once in any period of 12 months

3.1.3 If the premises are destroyed or damaged by fire or other risk against which the Landlord has insured and payment of the insurance money is not refused in whole or in part by reason of any act or default of the Tenant or

anyone at the demised premises or in the Building expressly or by implication with the Tenant's authority or under the Tenant's control as soon as reasonably practicable after all necessary Planning and other consents have been obtained to lay out the insurance monies in rebuilding repairing and reinstating the Premises

3.2. To keep in as good repair decoration and condition as the same are in at the date hereof

3.2.1 the exterior and structure of the Building including the roof foundations and external walls

3.2.2 all drains pipes and wires serving the demised premises other than those being the Tenants responsibility within the demised premises and all sewerage facilities

3.2.3 keep tidy the yard areas access roads and common parking areas which form part of the Estate (but excluding any car parking spaces which are included in the demise of any Unit)

3.3 To maintain repair and decorate when reasonably necessary all parts of the Building the use of which is shared by two or more tenants and to clean and light the same

3.4 That the Tenant paying the rents hereinbefore reserved and performing and observing the several covenants conditions and agreements herein contained and on its part to be performed and observed may peaceably hold and enjoy the demised premises during the term hereby granted without any interruption or disturbance from the Landlord or any person or persons lawfully claiming under or in trust for the Landlord

4. PROVIDED ALWAYS and it is hereby agreed and declared as follows:-

4.1 That if the rents hereinbefore reserved or any part thereof shall at any time be in arrear and unpaid for twenty one days after the same shall have become due whether legally demanded or not or if the Tenant shall at any time fail or neglect to perform or observe any of the covenants or agreements herein contained and on the Tenant's part to be performed and observed or if the Tenant for the time being shall become bankrupt or being a company shall enter into liquidation whether compulsory or voluntary other than for the purpose of reconstruction or amalgamation then and in any such case it shall be lawful for the Landlord or any person or persons duly authorised by the Landlord in that behalf to re-enter into and upon the demised premises or any part thereof in the name of the whole and thereupon this demise shall absolutely determine but without prejudice to any right of action or remedy of either party in respect of any antecedent breach by either party of any of the covenants or agreements herein contained

4.2 That if and so often as the demised premises shall be destroyed or damaged by fire or other risk against which the Landlord shall have insured (not caused by the wilful act or default of the Tenant) so as become unfit for the occupation or use for the purpose aforesaid the said rents or a just and proportionate part thereof according to the nature and extent of the damage sustained shall abate and be allowed to the Tenant from the time of the destruction or damage until such time as the demised premises shall be rebuilt and reinstated or until the date of expiry of the notice of election by the Landlord or the Tenant under the proviso hereinafter contained whichever shall be the earlier PROVIDED further and it is a condition of this Lease that if through any cause whatsoever the demised

premises shall be destroyed or so damaged as to become wholly unfit for occupation or use for the purpose aforesaid and shall remain so for a period of two years from the date of such damage or destruction then either the Landlord or the Tenant may elect to treat this Lease as at an end by serving upon the other party hereto at any time after the expiration of such two year period not less than one months notice in writing of such election and upon the expiration of such notice the term granted by this Lease shall forthwith terminate but without prejudice to the rights of either party hereto in respect of any then subsisting breach of covenant and to any claim the Tenant may have under the insurance of the Premises and the insurance monies shall belong absolutely to the Landlord

4.3 The provisions of Section 196 of the Law of Property Act 1925 as amended by the Recorded Delivery Service Act 1962 shall apply to any notice under this Lease

4.4 Except in the circumstances mentioned in Section 38 (2) of the Landlord and Tenant Act 1954 the Tenant shall not be entitled on quitting the demised premises to recover from the Landlord compensation under Section 37 of the said Act

4.5.1 The Landlord shall as soon as convenient after the 31st December in each year prepare an account showing the Annual Expenditure for the Financial Year ending on that date and containing a fair summary of the expenditure referred to in it and upon such account being certified by the Accountant it shall be conclusive evidence for the purposes of this lease of all matters of fact referred to in the account except in the case of manifest error

4.5.2 The Tenant shall pay for the period from the date hereof to the 31st December next following the date of this lease an Initial Provisional Service Charge calculated at the rate of £370 per annum the first

payment being a proportionate sum in respect of the period from and including the date hereof to and including the last day of the same month to be paid on the date of this lease the subsequent payments to be made quarterly in advance on the usual quarter days

4.5.3 The Tenant shall pay for the next and each subsequent Financial Year a provisional sum calculated upon a reasonable and proper estimate by the Landlord of what the Annual Expenditure is likely to be for that Financial Year payable by equal monthly payments in advance on the 1st day of each month

4.5.4 If the Service Charge for any Financial Year shall:-

4.5.4.1 exceed the provisional sum for that Financial Year the excess shall be due to the Landlord on written demand or

4.5.4.2 be less than such provisional sum the overpayment shall be credited to the Tenant against the next quarterly payment of the Rent and Service Charge or at the end of the Term repaid to the Tenant

4.6 For the security of the Estate and the Building the main gate into the Estate will be locked with a security padlock except during the hours of 8.00am and 6.00pm Mondays to Fridays (other than bank holidays) one key shall be issued to each Tenant on the Estate or in the Building against a deposit of £20.00 which shall be forfeited if the key shall be lost it shall be the responsibility of the Tenant to ensure that it or any of its employees using the the main gate outside the specified hours relocks it immediately after entry or departure

4.7 4.7.1 The Landlord served on the Tenant a Notice dated 9th December 2019 in accordance with Section 38(A)(3)(a) of the 1954 Act

4.7.2 A Declaration dated 16th DECEMBER 2019 was made by the Tenant in accordance with paragraph 4 of Schedule 2 to the Regulatory Reform (Business Tenancies) (England and Wales) Order 2003.

4.7.3 the provisions of Sections 24-28 (inclusive) of the Landlord and Tenant Act 1954 are excluded in relation to the tenancy created by this lease.

5 The Deposit

5.1 The Landlord hereby acknowledges receipt from the Tenant of a deposit of £2500 ("the deposit") to be held by the Landlord on the terms hereinafter appearing

5.2 (a) The deposit shall be held by the Landlord in a separate seven day notice interest bearing deposit account with a Joint Stock Bank maintained solely for the purpose of holding such deposit rents and identified as such as security against the failure by the Tenant to pay or late payment of the rent ("the rent") or other sums for the time being and from time to time reserved by and payable under this Lease and as security for the Tenant complying with its other obligations hereunder

(b) If the Tenant shall fail to pay the rent or other sums as aforesaid upon a date 14 days after which they shall be due and payable or if the Tenant shall fail to comply with its obligations hereunder the Landlord may appropriate an amount equal to such rent or other sums or the Landlord's loss as the case may be from the deposit without

notice to or authority from the Tenant

- (c) If the Landlord shall have appropriated monies from the deposit in accordance with sub-clauses (i) and (ii) above and the Landlord shall subsequently receive from the Tenant monies in respect of rent or other sums as aforesaid for which the Landlord has appropriated the deposit or any part thereof the Landlord may without reference to the Tenant treat such monies as or on account of repayment of the monies appropriated from the deposit

5.3 The Tenant hereby COVENANTS with the Landlord to maintain throughout the term and any statutory extension or renewal thereof the deposit at an amount equal to the deposit amount referred to on clause 5.1 hereof and if any monies shall be appropriated from the deposit by the Landlord in accordance with sub-clause 2(a) and (b) hereof the Tenant shall forthwith on request from the Landlord pay to the Landlord the amount requested to maintain the deposit at the relevant level

5.4 Charge of the Deposit Account

5.4.1 The Tenant warrants to the Landlord that the Initial Deposit is free from any charge or incumbrance save as mentioned in clause 5.4.2

5.4.2 The Tenant as beneficial owner charges its interest in the Deposit Account and all money from time to time withdrawn from the Deposit Account in accordance with this deed.

5.4.2.1 Until such time as the Deposit Account shall be closed in accordance with clause 5.5 and

5.4.2.2 as security for money payable to the Landlord in the event of default

5.4.3 The Tenant covenants that it shall

5.4.3.1 Within 7 days of entry into this Deed procure registration of the charge mentioned in clause 5.4.2 pursuant to the Companies Act 1985 Section 395 and

5.4.3.2 Execute any document or take any action which the Landlord may reasonably specify in order to perfect the security referred to in clause 5.4.2

5.4.4 The security referred to in clause 5.4.2. is in addition to and shall not be merged with or prejudice or affect or be affected by any other security interest of the Landlord as regards the Tenant.

5.5 The Landlord covenants with the Tenant on a permitted assignment of the lease or upon the expiry or earlier determination of the term to repay to the Tenant the Deposit or such part thereof as shall not have been appropriated together with the interest earned thereon within 7 days of the permitted assignment or of the expiry or earlier determination of the term provided that the deposit has not been previously repaid.

6. IN this Lease words importing the masculine gender also include the neuter and the feminine gender and vice versa and words importing the singular number include also the plural number and vice versa and where there are two or more persons included in the respective terms "the Landlord" and "the Tenant" the covenant expressed to be made respectively by them shall be deemed to be made by such persons jointly and severally
7. It is hereby agreed that no term of this Lease may be enforced solely by virtue of Section 1 of the Contracts (Rights of Third Parties) Act 1999
8. There is no agreement for lease or tack to which this Lease gives effect

IN WITNESS whereof the Landlord and the Tenant have signed this as their Deed the day and year first above written

THE FIRST SCHEDULE before referred to

PART I

The First Demised Premises

ALL THOSE Units situate in the Building and known as Unit 9 -11 ("the Units") and for identification shown on the plans edged with red including one half severed vertically of all walls dividing the Units from any adjoining units all walls within the Units and the internal face of all external walls of the Building bounding the Units the floor and ceiling (if any) of the Units the windows and doors of the Units and the frames surrounding them AND the car parking areas outlined in Red on the Plan annexed hereto

THE SECOND SCHEDULE before referred to

Rights granted

1. The right for the Tenant and its agents servants and licensees in common with the Landlord and all others so entitled to pass and repass with or without vehicles over and along the roadways on the Estate and along the roads leading therefrom to the nearest adopted highway for the purpose of obtaining access to and egress from the demised premises and the designated parking spaces
2. The right in common with the Landlord and all others so entitled to free passage of services through drains water pipes gas pipes electricity wires sewers and other service conduits which connect the demised premises with the main supplies of electricity gas and water and all sewage foul water and surface water drainage facilities

THE THIRD SCHEDULE before referred to

Exceptions and Reservations

1. The right for the Landlord and its other Tenants on the Estate to connect into and use all such drains water pipes gas pipes electricity wires and other service conduits as now are or hereafter shall be in or run into or through the demised premises subject however to paying a contribution towards the maintenance costs except in the case of such matters (if any) as are the Tenants responsibility
2. To the Landlord the right to enter on the Demised Premises for the purpose of cleansing and repairing the foul drain and repairing and maintaining the parts of the Demised Premises as covenanted so to do.

THE FOURTH SCHEDULE

The Authorised Guarantee Agreement to be given by the Tenant

THIS DEED is made the day of 20

BETWEEN:

(1) [] of [] ("the Tenant")

And

(2) [] whose registered office is at []
[] (registered number :
) ("the Landlord ")

WHEREAS

(A) This Agreement is made pursuant to the lease ("the LEASE ") dated 2019 made between (1) and (2) which expression shall include (where the context so admits) all deeds and documents supplemental to the lease (whether expressed to be so or not) relating to the Premises known as ("the Premises")

(B) The Tenant holds the Premises under the lease and wishes to assign the Lease to the prospective assignee ("the Assignee ") [] whose registered office address is at [] and pursuant to the lease the Landlord's consent is required to such assignment ("the Assignment ") and such consent is given subject to a condition that the Tenant is to enter into a Deed in the form of this Deed [and pursuant to [paragraph [] of Schedule [] / Clause [] to / of the Lease / Licence to Assign made the day of 20 between (1) [the Landlord] (2) [the Tenant] and (3) the Guarantor the Guarantor has agreed to enter into this Deed.

NOW THIS DEED WITNESSES as follows:

1. Authorised Guarantee

Pursuant to the said condition the Tenant covenants with the Landlord as a primary obligation that the Assignee or the Tenant shall at all times during the period ("the Guarantee Period") from the completion of the Assignment until the Assignee shall have ceased to be bound by the tenant covenants (which in this deed shall have the meaning attributed thereto by Section 28(1) of the Landlord and Tenant (Covenants) Act 1995 "(The 1995 Act ") contained in the Lease (

including the payment of the rents and all other sums payable under the lease in the manner and at the times specified in the Lease duly perform and observe the tenant covenants.

2. Tenants liability

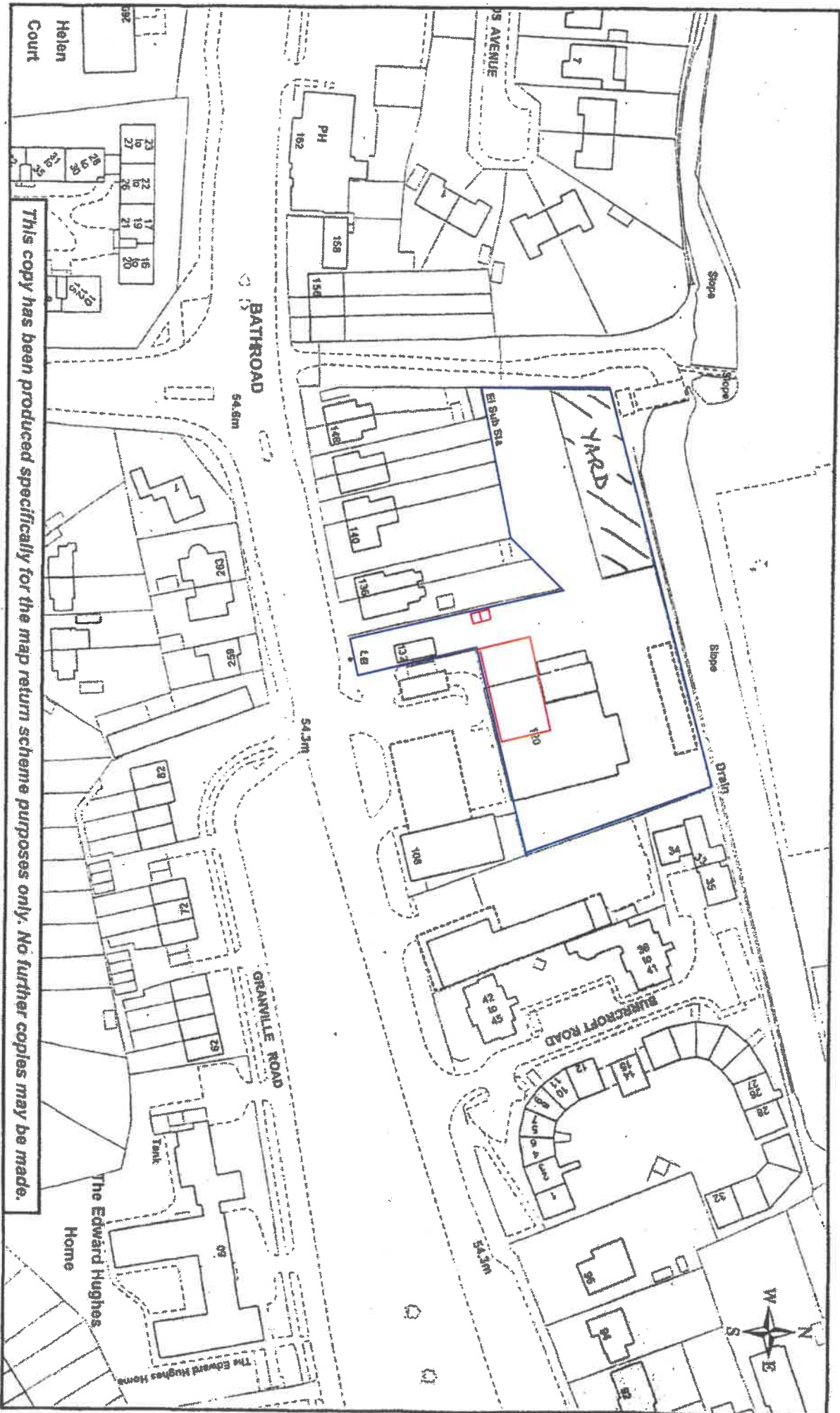
2.1 The Tenant agrees that the Landlord in the enforcement of its rights under this Deed may proceed against the Tenant as if the Tenant were the sole or principal debtor in respect of the tenant covenant in question.

2.2 For the avoidance of doubt notwithstanding the termination of the Guarantee Period the Tenant shall remain liable under this Deed in respect of any liabilities which may have accrued prior to such termination.

2.3 For the avoidance of doubt the Tenant shall be liable under this Deed for any costs and expenses incurred by the Landlord in enforcing the Tenants obligations hereunder.

3. Disclaimer of Lease

The Tenant further covenants with the Landlord that if the Crown or a liquidator or trustee in bankruptcy shall disclaim the lease during the Guarantee Period the Tenant shall if the Landlord by notice in writing given to the Tenant within six (6) months after such disclaimer so requires accept from and execute and deliver to the Landlord a counterpart of a new lease of the Premises for a term commencing on the date of the disclaimer and continuing for the residue then remaining unexpired of the term of the Lease such new lease to be at the same rents and subject to the same covenants and provisions as are contained in the Lease.



Title: Location Plan

132 Bath Road, Reading

Produced by GIS & Mapping Services

Date: 26/02/2003

Scale: 1:1250

Drawing: 1241132A



Reading
BOROUGH COUNCIL

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Executed as a DEED)
by **BRITISH ESTATE SERVICES**)
LIMITED acting by)

Director/Secretary

Witness:

Name:

Address

Occupation

Signature

SIGNED by)
)



Witness: J. W. M.)
Name: D.)

Address

Occupation Surveyor)

Signature J. W. M.)

WR3w: Part of Tesco Car Park, Portman Road

Our Ref: 3200/CS/LT2024012

31st January 2024

Planning Policy Team
Reading Borough Council
Civic Offices
Reading
RG1 2LU

By Email Only

MRPP
MARTIN ROBESON
PLANNING PRACTICE

Town Planning Consultants
Development Advocacy

21 BUCKINGHAM STREET
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Dear Sir/Madam,

REPRESENTATIONS TO THE READING BOROUGH LOCAL PLAN PARTIAL UPDATE CONSULTATION ON SCOPE AND CONTENT UNDER REGULATION 18

On behalf of our client Tesco Stores Ltd. we hereby submit representations to the above emerging Plan. Tesco trade from Extra stores on Napier Road and Portman Road in Reading. Tesco has made a significant investment in Reading and continues to do so today.

These representations primarily concern Site Cen7: Tesco Extra, Napier Road, and provide response to the matters raised within the consultation document, then set out the site's comparative merits for allocation, in response to Q68.

These representations also promote the site at Portman Road, Reading, RG30 1AW for allocation for residential development. This site is also an area of car park to the Tesco Extra store at the above address, which is surplus to operational requirements, and is the subject of a full planning application currently under consideration by Reading Borough Council ref. 231041 .

Site Cen7: Tesco Extra, Napier Road

The site above comprises an area of surplus car parking land to the Tesco Extra store at Napier Road in central Reading. The site was nominated on behalf of our client to the Call for Sites exercise undertaken in 2023, and is now included within the regulation 18 consultation document for the Local Plan Partial Update as Site Cen7 under Policy CR14: Other sites for potential development in Central Reading.

Further detail on the nominated sites is provided at Appendix 2 to the draft Plan Site Cen7 on page 118 . In relation to Site Cen7, the document notes at page 118 the development suggested by the nominator residential development of 150-200 dwellings , as well as three 'alternative options' provided by the Council for the purposes of this consultation exercise: 1. No allocation 2. Additional retail development and 3. Residential development at "more typical urban densities" of 100 dwellings.

Justification for the nominated development was provided within the Call for Sites submission, which is appended to this letter for convenience. A rebuttal to each of these 'alternative options' is provided below.

Alternative Option 1: No Allocation

The first alternative option set out within the consultation document is for no allocation this is not considered an appropriate response to the opportunity presented by the identified site.

As set out within the appended call for sites submission, our client has identified that the area of car parking land could be developed without compromising their operational requirements, arising from changes to the retail climate and greater support for sustainable travel. There is an identified and quantifiable need for land suitable for residential development within the Borough, and there is local and national preference for this land being brownfield in nature and sustainably located. While there are 'constraints' identified within the consultation document, these were addressed within the Call for Sites submission and would be matters for consideration through design development, and should not deter identification and allocation of the site for the principle of residential development.

There is an identified need for land for housing development and the identified Site Cen7 at Napier Road is suitable and available for such development. This constitutes an ideal opportunity for allocation within the emerging Local Plan.

Alternative Option 2: Additional Retail Development

The second alternative option identified is for additional retail development at the site. While the site is currently part of the wider foodstore use at the Tesco Extra store and is within the town centre / Central Area, the site does not lie within the Primary Shopping Area as defined by Policy CR1, the Council's preferred location for new retail development.

The development of additional retail uses, rather than residential use, is thus not considered to be appropriate.

Alternative Option 3: Residential Development at Lower Density

The third alternative option identified is for development at "*more typical urban densities*", which would be for circa 100 dwellings as opposed to 150-200 dwellings put forward with the site nomination. It is considered that given the identified need for residential development and the particular suitability of this site, development at higher densities should be sought.

The site lies within the defined Central Area, which is identified within the adopted Plan as having capacity for development by "*efficient use of underused land through carefully developing at higher densities*", which "*represents the most significant opportunity to accommodate new development within Reading*" 5.2.15 . There is further support for making effective use of land within the National Planning Policy Framework, as set out within the nomination response appended. This is a particularly important consideration

with respect to the preparation of the emerging Partial Update given the significantly increased housing requirement.

Indeed, Policy H2 of the emerging Plan document recognises the substantial support in national policy for optimising the use of land, and proposes a minimum density of 200 dwellings per hectare for sites within the town centre paragraph 8.18 .

It is therefore considered that alternative option 3 would be inappropriate and not supported by the emerging Policy H2 , and thus the site should be identified and allocated for residential development of a higher density.

Comparative Merits of Site Cen7: Tesco Extra, Napier Road

To further aid the objectives of the consultation exercise, the particular merits of the site at Napier Road by comparison to some of the other sites nominated for development are set out below.

First, the nature of the site lends itself to sustainable development as, while it constitutes brownfield land, there is no existing building on the site and its current use area of foodstore car park has been identified by our client as being surplus to operational requirements. There would therefore be no loss of any productive use as a result of redevelopment, and no significant barriers to deliverability from the need for cessation of existing operation prior to development.

By comparison, several of the sites identified at Appendix 2 within Central Reading are either in use as existing e.g. for retail, office, or community uses or are identified for particular other types of development e.g. within the Primary Shopping Area or Office Core under adopted Policy CR1 . Redevelopment of such sites may result in the loss of existing or identified uses, or require the incorporation of other uses within a mixed use proposal, which can raise further constraints or difficulties. These sites may therefore be considered by the Council to be more suitable for continuation of or new development for uses other than residential development. By comparison Site Cen7 represents an ideal opportunity for unhampered delivery of significant residential development.

Second, in relation to the above Site Cen7 would not require any substantial loss or demolition of existing buildings or structures given its existing use as car parking land. There is substantial and increasing local and national support for the minimisation of embodied carbon associated with development. This is recognised within the direction set out under emerging Policy CC2 and the “*presumption against demolition*” as set out at 5.7 of the consultation document.

Several of the sites set out at Appendix 2 of the Plan are promoted on the basis of demolition and redevelopment for residential uses. Indeed the conversion of existing office buildings is identified as an ‘alternative option’ by the Council in relation to several of the sites, but it should be noted that this could result in the delivery of small unit numbers. No such dilemma is applicable to Site Cen7 and it is therefore considered a preferable option for allocation.

Third, Site Cen7 benefits from being in a central location with excellent connectivity and access to amenities as set out within the appended Call for Sites submission . However,

the site also benefits from being relatively unconstrained in terms of its surrounding existing uses, with the only identified use being that of the foodstore and its car park. This would therefore limit the amenity issues which often constrain the development of town centre sites.

Many of the other sites identified lie within more densely developed areas containing a wide mix of uses, which may conflict with and/or limit the delivery of the residential accommodation required under the Partial Update. Further it is noted that many of the identified sites will fall within or affect areas of particular heritage sensitivity. Site Cen7's relative separation from existing uses, despite being centrally located and previously developed, further provides preference to other sites identified.

Fourth, Site Cen7 constitutes a relatively large site within the Central Area, capable of making a substantial contribution towards the identified housing need, but remains deliverable towards the beginning of the plan period. The site is under the single, freehold ownership of our client and is the subject of substantial historic and current market interest. Many of the other sites identified would be subject to more complex ownership arrangements and require land assembly, or would make a comparatively small contribution to the substantial housing need identified. The relative ease of deliverability of this site despite its size and location further supports its proposed allocation.

Site Cen7: Tesco Extra, Napier Road is therefore considered to be suitable and deliverable for a large quantum of residential development, and preferable to many of the other sites identified within the consultation document.

Land at Portman Road, Reading

On behalf of our client, we would also identify a further site, Land at Portman Road, Reading, RG30 1AW, for identification and allocation for residential development within the emerging Partial Update.

The Portman Road site comprises approximately 0.77ha of surplus car parking land identified by our client, and is presently the subject of a full planning application ref. 231041 for residential development comprising 80 apartments. The application remains under consideration by the Council, and the applicant, Ridgepoint Homes, have also made representations to this consultation to promote this site for allocation.

The site is very sustainably located within the existing developed area of Reading, a short distance from Reading West Station and the further transport options and amenities offered by Oxford Road to the south. The site is considered to be relatively free of any constraints to development as supported by the above planning application documentation, and would further contribute towards the local and national objectives of housing delivery and the optimisation of under-utilised and brownfield land. Further, the site is in single ownership by our client with an agreement in place with Ridgepoint Homes for the site's development. The site at Portman Road is therefore suitable and deliverable in the short term for residential development.

It is on this basis that the site at Portman Road is also put forward to be considered for allocation within the emerging Partial Update.

We trust that these representations will assist the Council in the continued preparation and development of the Local Plan Partial Update, and are willing to discuss the content of any of these representations.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Craig Stewart'.

Craig Stewart
craigstewart@mrpp.co.uk

Your reference number is FS-Case-522482194.

Thank you for submitting Call for sites form (development)

Name: Craig Stewart

Organisation (if applicable): MRPP

On behalf of: Tesco Stores Ltd

Telephone: 02079300007

Email address: craigstewart@mrpp.co.uk

Site address: Tesco Extra, Napier Road, Reading RG1 8DF

Are you the owner: Yes

Are you a freehold or leasehold owner?: Freehold

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: No

What is the size of the site in hectares?: 0.86

What is the current land use of the site?: Customer car parking

What is the proposed land use of the site?: Residential. 150-200 dwellings.

Has there been any recent market interest in the proposed use of the site?: Yes

Please provide further details of the recent market interest: Historic and continuing

What is the likely timescale of the site becoming available during the plan period?: 1-5 years

Is the site already allocated in a development plan?: No

Please give any other information that you consider relevant to enable assessment of the candidate site:

This 'call for sites' response is made on behalf of our client Tesco Stores Ltd. Tesco trade from a Tesco Extra store located at Napier Road, in central Reading. The plan attached identifies the site in question.

In summary, Tesco identify that there is an opportunity presented by excess car parking land to facilitate a significant contribution towards the recent, substantial increase in the Council's objectively assessed housing need.

Planning Policy and Increased Housing Need

We understand that a partial update to the Reading Local Plan is to be undertaken, covering around 50% of the policies within the Plan. The Report to the Strategic Environment, Planning and Transport Committee notes that the recent Local Plan Review "has determined that there is a need for a partial update of the Local Plan, in particular to take account of the new methodology for determining housing needs" (paragraph 1.1).

The increased housing need is dictated by the use of the national 'Standard Methodology', per paragraph 61 of the NPPF and the Local Plan Review document calculates that this methodology creates a need for 883 dwellings, a substantial increase from 699 under the previous Plan. Indeed, this was seen to be a sufficiently substantial increase so as to trigger an update of housing policies, and thus allocations. The above need figure will be recalculated in the future to inform the emerging strategic policies, but of relevance is that the recent NPPF draft consultation has reaffirmed the national commitment to a 35% uplift to housing need calculations under the Standard Methodology in the top 20 cities and urban centres, of which Reading is one. The additional housing need in Reading is thus likely to remain significant.

The Site

The site comprises a broadly triangular area of land within the Tesco store car park, measuring approximately 0.86ha in size. Tesco have identified this parcel as surplus car park land, the loss of which would not compromise the operation of the foodstore, reflecting changes in retail climate and support for sustainable travel. The area of woodland located immediately to the east of the site, known locally as 'The Coal' is also owned by Tesco.

Outline planning permission for Tesco on the wider site was granted in 1989, with reserved matters approval granted in November 1989.

Site-Specific Appraisal

In site-specific terms, an appraisal of opportunities and constraints provides substantial support for a relatively high-density housing development.

The development plan currently comprises the Reading Local Plan, adopted in November 2019. The site is identified within the current local plan as being within the Central Reading Area, and is previously developed urban land. Both the existing development plan and the National Planning Policy Framework (NPPF) direct that identified needs should primarily be met on such land.

Indeed, the national policy direction within the NPPF on 'Making effective use of land' provides that "Planning policies and decisions should [...] promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure" (paragraph 120(d)).

The existing Local Plan identifies the Central Reading Area as having capacity for development by "efficient use of underused land through carefully developing at higher densities", which "represents the most significant opportunity to accommodate new development within Reading" (5.2.15). The preference for this manner of development has presumably only increased given the aforementioned increase in objectively assessed housing needs within the emerging Partial Review.

The site is well-connected to the rest of the Central Area via a footway along Napier Road and the Napier Road Underpass. Bus service 148 also links the Tesco Extra store with the town centre, approximately 2km away. Reading Station is located approximately 1.4km / 18 minutes' walk away from the site, with excellent transport connections. This connectivity provides access to the requisite amenities and facilities via sustainable transport methods, of course alongside the Tesco Extra store itself.

When compared with much of the remainder of the Central Area, the site is unconstrained by surrounding development. There are no existing residential properties in the immediate vicinity, and nor are there any industrial or otherwise incompatible uses. The site is thus without constraints or concerns regarding residential quality. The site is also likely of sufficient viability so as to provide its full, policy-compliant share of affordable housing.

In heritage terms, the site is not located within a Conservation Area and is not in the immediate vicinity of any designated heritage assets. The closest heritage asset is the Grade II listed Railway Bridge, located approximately 150m to the south east of the site and is afforded screening by the surrounding wooded area. It is confirmed within the existing Local Plan that heritage interest constrains much of the Central Area (5.1.7), and thus the relative lack of heritage assets on this site provides an opportunity for development of a relatively high density.

The disposal site lies within the 'Area Safeguarded for Crossrail'. This does not prevent development, and simply requires any applications affecting the land to be statutorily referred to Transport for London for consultation. The Local Plan Review document notes that the Elizabeth Line to Reading is now operational and that "the land covered by the direction and shown on the Proposals Map has not been required" (3.508). Thus while the safeguarding direction has not been formally withdrawn, this does not provide a constraint to development.

The site falls entirely Flood Zone 2 as identified within the Environment Agency's 'Flood Map for Planning'. This is, however, not to be seen as a constraint on development in itself, given that the Local Plan's assessment of the Central Area notes that "much of the centre, including some of the more obvious redevelopment opportunities, lies within the flood plain" (and parts of the centre lie within Flood Zone 3, less sequentially preferable).

The area surrounding the site, but not the site itself, is of landscape and biodiversity interest with relevant designations. The area of woodland adjacent to the site, known as 'The Coal', is an Area of Biodiversity Interest, along with the woodland belt to the north and the open land at Kings Meadow. The latter two are also designated as 'Local Green Spaces', but this does not extend to include The Coal. While development should be sensitive to these designations, it is relevant for potential residential quality that the site is afforded access to areas of landscape and visual amenity. Development on the site could provide opportunity for improvements/maintenance to The Coal, or public access if this were an aspiration of the Council.

The site is adjacent to the 'Major Landscape Feature', the Thames Valley. This also does not preclude residential development on the site, but development ought to respect the Thames Valley through sensitive design and consultation with relevant groups. Again, this Feature would add to the visual amenity value experienced on the site.

Conclusion and recommendations

The above appraisal provides that the site constitutes an excellent opportunity for residential development. Its nature as previously developed land within the Central Area supports development of a relatively high density to provide a substantial contribution towards the recent increase in objectively assessed housing need. The site benefits from excellent access to amenities and services, including the Tesco store itself. The surrounding landscape and biodiversity interests and designations should encourage development towards a sensitive and complementary approach but do not prevent development in principle, rather they enhance amenity value.

In light of the increased housing need and to optimise use of this previously developed, urban site (as directed by local and national policy), and with reference to comparable residential schemes, a relatively high density would be appropriate. It is therefore considered that the site could provide for 150-200 dwellings, at a high density and with a greater proportion of smaller unit sizes.

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : Site plan.pdf

RIDGEPOINT HOMES

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

25th January 2024

Dear Sir/Madam,

**Re: Representations - Local Plan Partial Update Regulation 18 Consultation
Land at Portman Road, Reading West RG30 1AW**

We are writing to provide a representation to Reading's Local Plan Partial Update Regulation 18 Consultation to specifically promote the site referred to above as a housing allocation. This covering letter sets out the site context and suitability of the site for residential development.

Introduction - Site Context

The site extends to circa 1.4 acres and is located within the curtilage of the existing Tesco Extra store in Reading West. The site is under the single ownership of Tesco Stores Limited.

The site comprises the northernmost section of the Tesco car park which is now surplus to Tesco's requirements.

Access into the site is presently provided through the Tesco car park via a roundabout to the east, connecting to Portman Road to the north.

The Tesco Extra store with apartments above lies to the south of the site, fronting onto the Oxford Road West District Centre beyond.

Commercial properties are situated on the opposite side of Portman Road, ranging from 2-3 storeys in equivalent domestic scale, and the railway line beyond.

The Tesco petrol station lies to the immediate east and the new Bellway Homes development of the former Battle Hospital site, known as Renaissance, is located on the opposite side of the round-a-bout.

A recent modern housing development, completed by Barratt Homes, is located to the southeast, adjoining the Tesco store and comprises a mix of houses and apartments.

The western site boundary is formed by the Tesco service road and a belt of mature trees along the far side of this road, separating the site from the existing residential area further west.



Registered Office: Ridgepoint Homes Ltd, Terriers House, 201 Amersham Road,
High Wycombe, Buckinghamshire, HP13 5AJ
Registered in England and Wales - 05 0755
Website: www.ridgepointhomes.co.uk





Reading's Increased Housing Need

Housing need is calculated based on a national standard methodology which applies a 35% uplift to the local authorities that cover 20 largest urban areas in England, including Reading. This results in a need for 877 homes per year in Reading up to 2041, a substantial increase from the existing plan figure of 689 per year. This increased housing need will therefore require Reading to identify new sites for development.

Assessment of Site Deliverability

Site Achievability

A full planning application for residential development comprising 80 apartments was submitted to Reading Borough Council in July 2023 (ref: 231041) in order to make more efficient use of this parcel of the existing Tesco car park which is now surplus to requirements. The full planning application is currently under consideration and a decision is anticipated in April 2024.

As part of this planning, a full suite of assessments and surveys has been undertaken to include ecology, trees, flood risk & drainage, noise, geo-environmental and highways.

The development of the site for 80 dwellings is therefore achievable.

Site Availability

The site is currently under the single ownership of Tesco Stores Limited and Ridgepoint Homes have a legal option to purchase the land. The site is therefore available for development.

Site Suitability

The site is located in the defined settlement of Reading, the main focus for development in the Borough.

The site benefits from a highly sustainable location within less than 1 mile from the Oxford Road West District Centre frontage, 0.7 miles from Reading West Train Station and 1.5 miles from Reading Town Centre and Reading Train Station. There are also bus stops located Oxford Road to the south providing ease of access to public transport networks.

There are several shops, services and facilities within walking distance of the site, including the Tesco Extra store and library within 200m, a children's nursery within 0.3 miles, several places of worship, the Medicare Clinic and Oxford Road Pharmacy within 0.5 miles, Lidl Oxford Road, Salisbury Road Post Office and primary schools all within 0.6 miles and Inspire Dental within 0.9 miles.

The site is not subject to any environmental and policy constraints or any significant barriers to development.



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RIDGEPOINT HOMES

The site is therefore suitable for development.

Summary

Overall, it is considered that the site has no constraints, is in single ownership, is in a highly sustainable location, and is immediately deliverable. The site is therefore considered suitable, available, and achievable for residential development and will make a significant contribution towards the housing need in Reading.

Yours sincerely



Emma Runesson MRTPI
Planning Manager
T - 01494 781968
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WR3y: 72 Berkeley Avenue

From: [Tomas Evans](#)
To: [Planning Policy](#)
Subject: Call for sites form development - FS-Case-526882833
Date: 26 June 2023 14:29:17
Attachments: [72 Berkeley Avenue - Reading .png](#)

Name: Tomas Evans

Organisation (if applicable): The Leaders Romans Group

On behalf of: Paul Knight

Telephone: 07801988759

Email address: tevens@lrg.co.uk

Site address: 72 Berkeley Avenue, Reading, RG1 6HY

Are you the owner: No

Who is the owner?: Paul Knight

Do the owners, or other part owners, support your proposal?: Yes

Are there any legal agreements or covenants attached to the site that would be of importance to its future development or use (if known)?: Not known

What is the size of the site in hectares?: 0.33

What is the current land use of the site?: Children's Nursery/ Commercial

What is the proposed land use of the site?: Residential

Has there been any recent market interest in the proposed use of the site?: Not known

What is the likely timescale of the site becoming available during the plan period?: 1-5, 6-10

Is the site already allocated in a development plan?: Yes

If yes, and the proposed use is different, why do you consider that the allocation should be changed?: The previous allocation doesn't use the site

Please give any other information that you consider relevant to enable assessment of the candidate site: The site aims to relocate the nursery to Yeomanry House in readings, therefore there wont be a loss to the community uses.

Please attach a map at a minimum of 1:2500 scale showing the boundary of the site in red. : 72 Berkeley Avenue - Reading .png

