

Reading Local Plan 2037 Examination of the Local Plan

Matter 3: Housing, including Five Year Supply of Housing Land

Statement on behalf of CBRE Investment
Management

January 2026

Turley

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1. Introduction

- 1.1 This Statement is submitted on behalf of CBRE Investment Management (CBRE IM) to Stage 2 of the Reading Local Plan Examination and in response to 'Matter 3: Housing, including Five Year Supply of Housing Land' as set out in the Inspector's 'Schedule of Matters, Issues and Questions for Stage 2 of the Examination' (document EX037).
- 1.2 This Statement should be read in conjunction with the other Statements submitted on behalf of CBRE IM, and their representations to consultation on the draft Local Plan.
- 1.3 CBRE has an interest in, and has actively promoted the land at Meadow Road, Reading to the emerging Local Plan. The representations submitted to the Regulation 19 draft of the Local Plan objected to the continued allocation of the site for residential development by Reading Borough Council and set out how the site can be viably deliverable for commercial development, noting half of the site is within a longstanding Core Employment Area within the Borough.
- 1.4 The land promoted by CBRE IM at land Meadow Road, is partly sited within a designated Core Employment Area, where existing commercial operations are taking place, and partly identified as an existing residential allocation (ref. WR3b (2 Ross Road & Part of Meadow Road) in the existing Local Plan (adopted December 2019).
- 1.5 As identified during the Reg. 19 Consultation Stage, there is no evidence that this site is deliverable for housing, no pre-application or application discussions have taken place in the preceding 6 years from the adoption of the existing Local Plan.
- 1.6 CBRE IM have progressed a planning application under reference 25/1191 for:

"Full planning application for the demolition of existing and construction of employment units for flexible uses within E(g)(ii) and (iii), B2 and/or B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, access from Meadow Road and Milford Road, parking and landscaping"
- 1.7 This application was refused by the Council in December 2025. However, notwithstanding this it remains the intention of the landowner to pursue commercial uses whether through an appeal of the existing application, a new planning submission or the simple retention of its existing use for employment. Residential use remains not a reasonable prospect.
- 1.8 The proposed development's case is founded on:
 - There is no reasonable prospect of the site coming forward for residential use, it is not viable, and it is not CBRE IM's intention for the site. It means the requirements of paragraph 127 (paragraph 126 of the 2023 Framework) of the National Planning Policy Framework (The Framework) are met;
 - There is a significant need for employment floorspace as evidenced by the Local Plan Partial Review Update (Commercial Needs Assessment Jan. 2025 and Reading Employment Area Analysis April. 2025);

- The existing use of the site for employment is the legal fall back; and
- There are substantial economic and environmental benefits resulting from the proposals.

1.9 These representations may cross-reference to elements of the planning application material submitted under reference PL/25/1191 and available on the Council's online Planning Portal¹ in the public record. Should the Programme Officer or Inspector wish to have direct copies of this material we can happily provide paper and electronic copies upon request.

1.10 This Statement has been prepared on the basis that the Local Plan is to be examined against the NPPF published in 2023. Unless specifically referred to, any references to the NPPF are to that version.

¹ https://publicregister.reading.gov.uk/pr/s/planning-application/a0zP2000007pxl9IAI/pl251191?c_r=Arcus_BE_Public_Register&tabset-7417a=3

2. Response to Matter 3: Housing, including Five Year Supply of Housing Land

Issue 1: Will the Council be able to demonstrate a five year supply of housing land on adoption of the LPPU?

3.1 Will the LPPU provide a 5-year supply of deliverable sites against the LPPU's target of 825 dwellings per annum on adoption?

2.1 Yes.

2.2 On the basis of the trajectory submitted in EX003, the Council will have a five year housing land supply upon adoption (Anticipated 2026). It is noted, that the LPPU can still deliver a five year housing land supply on adoption with the exclusion of the carried over residential allocation under ref. WR3b (2 Ross Road & Meadow Road), which the Council consider will not deliver housing units until 2033/2034.

3.2 Is the housing trajectory at Appendix 1 of the LPPU realistic and does it align with the Summary Infrastructure Delivery Schedule at Table 10.2 of the LPPU and the Draft Infrastructure Delivery Plan (May 2025) [EV005]?

2.3 No.

2.4 CBRE IM do not consider the housing trajectory as published in Appendix 1 of the LPPU (and repeated in detail in document EX003) to be realistic insofar as it currently anticipates the delivery of housing units on the Site (2 Ross Road & Meadow Road) at a rate of 6.375 dwellings per annum for the period 2033/34 to 2040/2041, with the final units being delivered last monitoring year of the Local Plan Partial Update (LPPU).

2.5 This delivery rate has not been tested and appears to be calculated to retrofit an enhanced delivery capacity for the site in the LPPU (41-61 dwellings) compared to the estimated capacity in the adopted Local Plan (39-60 dwellings) with no additional justification provided within the evidence base.

2.6 The adopted Local Plan Housing Trajectory did not envisage the delivery of the allocation of WR3b within that Plan Period (until 2035/2036). There has been no evidence published to support the delivery of this Site for residential use either within adopted or emerging Local Plans.

2.7 CBRE IM do not foresee the delivery of any residential units on this Site and consider it be removed from the trajectory entirely.

3.3 Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity in the Reading Housing and Economic Land Availability Assessment (HELAA) [EV015 and EV016] reasonable and realistic? In particular, are the identified capacities for sites justified?

2.8 No.

2.9 The Reading Housing and Economic Land Availability Assessment (November 2024) examines a range of factors for suitability as set out at Para 3.14, including the following:

- *Whether there are existing residential uses on site;*
- *Whether there are existing economic development uses on site;*
- *Whether there are existing other uses on site;*
- *Vacancy; ...*
- *Whether the site is affected by potential contamination;*
- *Whether the site is in the Air Quality Management Area; and*
- *Whether the site is subject to potential noise and disturbance*

2.10 The HELAA Detailed Tables (EV016) incorrectly assess the Site, comprising HELAA Ref. TH022 (2 Ross Road) and TH023 (Cleared Site, Meadow Road) as follows:

Is the Site in existing employment use – Yes (TH022) No (TH023)

2.11 This is incorrect, with both TH022 and TH023 site being fully occupied by existing commercial premises by Green Metro Coaches Limited, a bus depot operating on the hardstanding area (TH023) and occupying Talbot House (forming part of TH022). The HELAA has not accounted for the loss of this employment land, nor the extant commercial use of land following the clearance of the site.

Is the Site in existing residential use – No

2.12 This is correct.

Is the Site in other existing economic use – No

2.13 This is incorrect. As identified above, the Site in its entirety is occupied by existing commercial premises that evidence the continued use of the site for commercial and employment generating enterprise that should be accounted for.

2.14 The HELAA incorrectly concludes the Site as 'suitable', when it recognises that the development of TH022 for residential "would require justification for the loss of employment" and this would also apply to the cleared site which holds commercial use as a Bus Depot.

2.15 The HELAA also underestimates the health and safety impacts of the Site, despite being identified as land being affected by contamination (a position concluded in the supporting planning application material submitted under ref. PL/25/1191), within an AQMA, and potential noise and disturbance affects of the adjoining Core Employment Area which is also under occupation to the west of the site.

2.16 The final comments to the development capacity of the Site show how the Council considered a reduction in 10 residential units to reflect the suitability of the Site as well as the inclusion of a 20m buffer to industrial units to the west. It is noted that this stage, the HELAA assesses the Site as being 'suitable' to accommodate only 26 units.

- 2.17 The 20m buffer between the uses within the HELAA is unsubstantiated with no commentary or evidence or testing being provided on why such a buffer is necessary, with the LPA recognising the existing juxtaposition and co-habitation of employment and residential uses in the area. No evidence or commentary has been provided to demonstrate how the site could make a continued effect in maintaining commercial floorspace in proximity the A33 and Internal Distributor Road Corridor.
- 2.18 In assessing availability, the HELAA notes *“starting point for assessing availability is to contact the owners and developers of the sites in question ... There was no need to make contact where a site is already under construction, as it is clearly available and achievable, or where full information was already known through other discussions. There were certain sites, where it was felt for reasons of sensitivity that it would be unwise to contact owners to avoid misunderstandings (for instance where a site had previously received only negative feedback from the Council, based on policies that may not be carried forward)”*.
- 2.19 Paragraph 3.21 notes that the following fed into consideration of whether a site was available:
- Any stated landowner intention, including any progress made with planning discussions;
 - Any legal issues affecting the availability of the site;
 - Whether there are existing uses that require relocation; and
 - Likely timescale for site becoming available
- 2.20 The area of the site subject to the carried over residential allocation at WR3b (comprising HELAA Ref. TH022 and TH023) is within single ownership and no contact has been made by the Local Authority to clarify the availability of this Site for residential development, exemplified by the aforementioned planning application submitted on behalf of CBRE IM for commercial development, being the extant use across the Site.
- 2.21 Indeed, EV016 confirms that *“intention is not known but is considered to be a site that has a realistic prospect of coming forward in plan period”*. This is despite no evidence nor inclination of the site coming forward within the adopted Plan Period, and the expecting delivery taking place nearly 10years following the adoption of the LPPU.
- 2.22 The HELAA again relies on the incorrect assessment of the site as having “no existing use” and incorrectly concludes that the “considered likely to be available”. As noted within CBRE IM’s representations to the Regulation 19 LPPU consultation, and again through the submitted planning application, it is CBRE IM’s position, as owner of the site, that there is no viable prospect nor proposition for residential uses to come forward on the site.
- 2.23 In assessing achievability, the HELAA confirms that the viability issues are “not known”. We would draw attention to CBRE IM’s representations to Matter 11 (Viability) whereby it is noted that there is not a single scenario tested by the local authority

where the site would deliver a viable residential development, despite the broad range considered. This position is supported following the submission of viability material in support of the planning application at the site that further illustrated that residential uses would not be a viable option, and that the Council should consider reasonable alternatives for the efficient use of land in this location.

- 2.24 Further, the HELAA, the site preparation costs and exceptional works cost are “not known” and no notes or remarks are present or considered the sites potential for contamination. Contamination is known at the site following intrusive work undertaken and evidenced within the supporting planning application material (Ref. 25/1191).
- 2.25 The final capacity of the site (accounting for the LPA’s variance rate within the HELAA) considers site as achieving a total of 33units (16 units for TH022 and 17units for TH023 The HELAA Detailed Tables (EV016). No further evidence or justification has been provided to demonstrate how the Site would be capable of delivering between 40-61 residential units as stated in the allocation.

3.4 Does the evidence give sufficient confidence that allocated sites will be deliverable and developable in accordance with the Framework?

- 2.26 No.
- 2.27 In accordance with the NPPF (2023), to be considered ‘deliverable’ sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
- 2.28 It has been demonstrated that the site is not deliverable within 5 years, with no application (nor prospect for residential application) following the adoption of the exiting Local Plan over six years ago, and the anticipation by the LPA that the Site will not delivered until 2036.
- 2.29 To be considered developable “*sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged*”.
- 2.30 As set out in detail in CBRE IM response to Matter 11 (Viability), it is clear that there are fundamental concerns with the viability of sites for residential use. In respect of the draft allocation at WR3b, there is **no scenario** tested by the local authority where the site would deliver a viable residential *development*. *In order for a site to be considered ‘developable’, sites should have “a reasonable prospect that they will be available and could be viably developed at the point envisaged”*. As established throughout this Statement, the site is **not available** for residential development, is **not viable** proposition, and would be expected to be delivered some 15 years following its original point of allocation in the adopted Reading Local Plan.
- 2.31 The site allocated through WR3b is not deliverable and developable in accordance with the Framework and needs to be de-allocated for the Plan to be found sound.

3.5 Is there compelling evidence to show that windfall schemes coming forward on small sites will provide a reliable source of supply as anticipated in the LPPU?

2.32 CBRE IM have no comment on this matter.

3.6 What is the annual need for affordable housing and the total affordable housing need over the plan period? Has the need for affordable housing been accurately calculated and based on robust, up-to date data? Has this need been calculated in accordance with the PPG? What is the past record for affordable housing completions and forms of delivery? How does the Council consider this will change in the future?

2.33 CBRE IM have no comment on this matter.

3.7 What are the identified needs for specialist housing, for example housing for older and disabled people and student accommodation, within the overall housing need for Reading? How will these needs be met?

2.34 CBRE IM have no comment on this matter.

Issue 2: Are the policies for housing positively prepared, justified, effective and consistent with national policy?

3.8 What is the evidential basis for the density and mix of housing in Policy H2?

2.35 CBRE IM have no comment on this matter.

3.9 Is Policy H2 justified and effective?

2.36 CBRE IM have no comment on this matter.

3.10 Is Policy H3 justified, effective, and consistent with national policy?

2.37 CBRE IM have no comment on this matter.

3.11 Is Policy H3 consistent with the PPG with regard to viability review mechanisms? Where would viability review mechanisms be appropriate and what are the clear process and terms of engagement explaining how and when viability will be reassessed?

2.38 CBRE IM have no comment on this matter.

3.12 What is the rationale behind the tenure mix in Policy H3? Is this justified?

2.39 CBRE IM have no comment on this matter.

3.13 Is Policy H4 justified? What is the evidential basis behind the amendment to part 2 of Policy H4 in respect of a further three-year tenancy?

2.40 CBRE IM have no comment on this matter.

3.14 Is Policy H5 justified, effective, and consistent with national policy? Is it accompanied by a robust and up-to-date evidence base?

2.41 CBRE IM have no comment on this matter.

3.15 Is Policy H6 justified and supported by robust and up-to-date evidence?

2.42 CBRE IM have no comment on this matter.

3.16 Would Policy H8 be justified and effective? How would Policy H8 be implemented as drafted? Does the supporting text support Policy H8 effectively?

2.43 CBRE IM have no comment on this matter.

3.17 Is Policy H12 justified and based on robust and up-to-date evidence?

2.44 CBRE IM have no comment on this matter.

3.18 Is the approach taken to renewal and regeneration of residential areas in Policy H14 justified and effective?

2.45 CBRE IM have no comment on this matter.

3.19 With regard to purpose-built shared living accommodation, is Policy H15 justified, consistent with national policy, and supported by a robust, up-to-date evidence base?

2.46 CBRE IM have no comment on this matter.

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