

9th January 2026
Delivered by email

Jane Greenway
Programme Officer
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Ref: OP-37-22

By Email:

jane.greenway@reading.gov.uk

Dear Jane,

Reading Local Plan Partial Update - Hearing Statement

Matter 3: Housing, including five-year supply of housing land

Hearing Session: Session 1, Tuesday 3rd February, 9.30am (provisional)

Participant: Mapledurham Properties Ltd

1. Introduction

- 1.1. This Hearing Statement is submitted on behalf of Mapledurham Properties Ltd in respect of the Reading Local Plan Partial Update (LPPU).
- 1.2. Mapledurham Properties Ltd controls land at Royal Court and Sapphire Plaza, which together have been promoted for residential development through the plan-making process.
- 1.3. The intent is to deliver all of the site for residential development, comprising Royal Court and Sapphire Plaza (as identified in previous Call for Sites (Examination Document (ED) EX005 – Site CR14z), Regulation 18 and Regulation 19 submissions (ED LP007 - 3 of 6, Mapledurham Properties).
- 1.4. Against this, the Council currently seeks to allocate only part of the site, Sapphire Plaza, which has a significant and unnecessary impact on housing delivery and undermines opportunity for the meaningful and substantially beneficial regeneration of the wider site and its immediate surroundings.

- 1.5. For the reasons set out in this short statement, it is clear that the Council's assessment of Site CR14z is erroneous. It is based on splitting Royal Court and Sapphire Plaza into two separate parcels and assessing them on this basis, rather than as a whole.
- 1.6. This statement responds to the Inspector's Matters, Issues and Questions (MIQs), as set out in ED EX037 and with specific reference to Matter 3: Housing, including Five Year Supply of Housing. Only pertinent questions are responded to, as identified in the following text, with the key focus of this Hearing Statement being on enhanced housing delivery.

2. Response to Matter 3, Issue 1

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

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?

- 2.1. It is considered that the Council has erroneously reviewed the development potential of a combined Sapphire Plaza and Royal Court scheme, with this reducing the potential of an immediately available site that can significantly contribute to housing delivery within the next 5 years.
- 2.2. ED EV015 identifies that part of the wider site as submitted for consideration, namely Royal Court, is unsuitable for development, extract below:

								Developable (years 6-10, 11-15)
AB084	Sapphire Plaza, Watlington Street	N	0.25	No	Suitable	Available	Potentially achievable	
AB085	Royal Court, Kings Road	N	0.16	No	Unsuitable	N/A	N/A	Not developable within the next 15 years

- 2.3. Looking in more detail at ED EV016, it is clear from Stage 1a Site Identification that the Council is aware that the sites were nominated together (Site Codes AB084 and AB085). It is also identified in the Stage 1b Exclusion process that neither site is subject to significant environmental or technical constraint.
- 2.4. At Stage 2a, regarding Development Potential, a pattern book calculation is used, resulting in assumed quanta of 82 dwellings at Sapphire Plaza and 17 dwellings at Royal Court. As the sites have been reviewed in isolation this unnecessarily reduces the overall delivery potential of the wider site and the additional dwellings that could clearly be provided via wholesale regeneration of the site, which would be able to use not only the footprint of the two existing sites, but the intervening land between them. As currently assessed, the sites conflict with each other, reducing the possibility for consideration of additional height and therefore quantum, given theoretical impacts of Sapphire Plaza on Royal Court and vice versa.
- 2.5. Further, and importantly, it is noted that some sites in the Stage 2a assessment have been subject to manual calculations, whereas others like Sapphire Plaza and Royal Court have been subject to a more standard pattern book approach. If a manual calculation was undertaken, perhaps considering other, similar recent developments in the town centre, it is clear that a higher quantum than that calculated could and should have been considered and achieved. Planning Application, PL/24/1155 at the John Lewis Collection Centre recently achieved Resolution to

Grant subject to s106 following substantial negotiation and technical review with Officers and Statutory Consultees. The agreed quantum of 170 dwellings on a site of similar size (0.44ha), but more local constraints clearly identifies that a similar quantum could be achieved on a joint Sapphire Plaza and Royal Court site.

- 2.6. It is considered that the above figure somewhat represents a minimum capacity, however, as the John Lewis site is located directly adjacent to the Inner Distribution Road with less relief than that available to Sapphire Plaza/Royal Court and it is also within closer proximity to Conservation Areas and Listed Buildings.
- 2.7. The John Lewis scheme, as determined by Planning Committee, has been designed to provide between 6 and 8 storeys in height. The Reg 19 detail submitted in respect of Sapphire Plaza and Royal Court identifies built form of 8 to 19 storeys, which has been subject to very significant technical due diligence in respect of *inter alia* Heritage, Townscape and Visual Impact (HTVIA) and Daylight/Sunlight to inform massing and layout (as submitted to the Council for consideration at both Reg 18 and Reg 19 stages). This in turn has been subject to two stages of pre-application consultation with Senior Members, Ward Members and local heritage groups to determine an acceptable start position in terms of built form for more detailed pre-application discussion with Planning Officers.
- 2.8. Clearly, more height and quantum can be achieved, yet at Stage 2b of the HELAA process Royal Court was deemed potentially suitable on all criteria, save for the conclusions which determine that the reduction in site area required to provide a 10m offset from the riverbank, plus proximity of neighbouring residential windows to the south renders any redevelopment unsuitable.
- 2.9. On this account, no further Stage 2c and Stage 2d assessment was made of the development potential of Royal Court and in tandem with this no assessment was made of the development potential of a combined Sapphire Plaza/Royal Court site. This is considered to be erroneous in approach. If assessed as one single, combined site (as submitted and recognised by the Council), it is clear that the wider development would be potentially suitable and would meet all assessment criteria. In this regard, it is not understood why the Council sought to split the site, which was nominated to come forward as a whole and for which substantial supporting technical evidence was submitted during the Local Plan process consultation stages to strongly make the case for development.
- 2.10. Taking the above into consideration, it is clear that the assumptions and analysis regarding site suitability, availability and achievability and development capacity in respect of Sapphire Plaza and Royal Court are not reasonable and realistic and that the identified capacity for the combined site is not justified. Site CR14z can and should provide significantly more housing and there is no encumbrance to doing so. It is therefore respectfully requested that the earlier Reg 18 consultation allocation for 250 – 400 dwellings is re-applied to this site, which will in turn assist the Council in terms of meeting challenging housing delivery requirements across the Local Plan period.
- 2.11. To achieve higher housing delivery on site in line with that identified in the Reg 19 submission, it would be necessary to amend the Policy CR10 'Areas of Less Suitability for Tall Buildings' zone to account for proposed buildings greater than 36m tall (which typically aligns to a 10 storey building once appropriate ground floor to ceiling heights, floor to ceiling heights elsewhere and plant and machinery requirements are accounted for). This matter is dealt with separately in our response to the Matters, Issues and Questions raised in respect of Matter 10: Site-Specific Policies.

2.12. For the purposes of understanding potential positive uplift on the current proposed housing trajectory, the site can be brought forward within the first five years of the updated plan period. Significant due diligence and pre-application work has already been progressed - the erroneous site allocation has been the sole delay to further progress of this scheme.

3. Participation at the Hearing

3.1 Opus Works wishes to participate in the hearing session to expand on the points raised above and respond to any further questions from the Inspector.

Submitted by:

Opus Works Consultancy Ltd

Date: 9th January 2025

Yours sincerely,

A handwritten signature in blue ink that reads "Jonathan Walton". It is written in a cursive, flowing style with a blue horizontal line underneath it.

Jonathan Walton
Planning and Development Director

jonathan.walton@opus.works