

Reading Local Plan 2037

Examination of the Local Plan

Matter 10: Site-specific policies

Statement on behalf of CBRE Investment
Management

January 2026

Turley

Contents

1.	Introduction	3
2.	Response to Matter 10: Site-specific policies	5

Peter Davis
Peter.Davis@turley.co.uk
Taylor Cherrett
Taylor.Cherrett@turley.co.uk

Client
CBRE Investment Management

Our reference
00631

09 January 2025

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 10: Site-specific policies' 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 Regulation 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 NPPF) 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 10: Site-specific policies

West Reading and Tilehurst

Issue 3: Are the policies for West Reading and Tilehurst justified, deliverable and consistent with national policy?

10.30 Is the strategy for West Reading and Tilehurst justified?

- 2.1 No.
- 2.2 It is acknowledged that the strategy for West Reading and Tilehurst is underpinned by “key principles” identified at Paragraph 7.2.1 of the LPPU (**Examination Document LP001**).
- 2.3 Part (a) of the key principles notes:
- a) Important employment areas will be retained for the most part, although some loss of identified fringe locations will help to manage the tension between employment and residential areas.*
- 2.4 CBRE IM consider that existing employment areas should be safeguarded in their entirety and the loss of these spaces for alternative uses restricted save for exceptional circumstances. This approach would accord with Reading being “*a hub for a variety of businesses, including ICT, professional services and science-based businesses, and at the same time it still hosts a number of industrial activities, and has an increasing role in logistics*” (Paragraph 1.2.3 of the LPPU)”.
- 2.5 The Vision for the LPPU identifies:
- “Reading will continue to thrive as an internationally recognised economic centre, and the core of a wider, vibrant urban area and surrounding hinterland within other authorities, that makes a vital contribution to the UK economy. It will be an environment where new business can start up and flourish. It will continue to adapt to ensure its success continues with economic changes and new working practices”*
- 2.6 The identified loss of ‘fringe’ locations, where they are in immediate proximity to successful Core Employment Areas, such as the Site is not supported by CBRE IM.
- 2.7 It is recognised that Reading has limited land available within its jurisdiction and the need to make more efficient use of land is great. Paragraph 8 of the NPPF (2023) confirms that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways.
- 2.8 For the economic objective, Paragraph 8a of the NPPF (2023) confirms that “*sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity*”.
- 2.9 The loss of employment land, whereby existing commercial enterprises occupy and operate from viably, would not be justified, in a particular in locations where they can

support recognised Core Employment Areas in an edge of Town Centre location, such as the Site.

- 2.10 CBRE IM therefore object to strategy for West Reading in already accepting the loss of established employment land, in particular where they occupy a strategic location.

10.31 Is Policy WR2 justified and effective?

- 2.11 CBRE IM have no comment on this matter.

10.32 What rationale is there for deleting site allocations WR3a, WR3c - WR3e, WR3m and WR3q?

- 2.12 CBRE IM have no comment on this matter.

Taking each of the following proposed site allocations WR3b, WR3f - WR3l, WR3n - WR3p, and WR3r - WR3y individually, respond to the following questions for each site as relevant:

- 2.13 The following commentary is provided solely in respect of Policy WR3b (2 Ross Road and Meadow Road).

10.33 What is the background to the site allocation? How was it identified and which options were considered?

- 2.14 Our client is completely unclear as to the background to the site allocation, other than it being a 'roll over' allocation from the adopted Local Plan. Our clients have not promoted it for residential use to the Local Plan.
- 2.15 CBRE IM would reiterate that the adopted housing trajectory considered the delivery of the allocation under WR3b as "*Longer Term/ Unknown*", beyond the identified 'Long' term period of between (2031 – 36) and the timeframe of the adopted Local Plan.
- 2.16 CBRE IM continue to promote the site for employment uses. This includes the Regulation 19 consultation where the Council were informed of an upcoming planning application for commercial uses, following the submission of a pre-application request.
- 2.17 The Statement of Consultation (May 2025) (**Examination Document LP010**) notes in response to CBRE IM's representations:
- "The site has significant constraints in terms of being identified as part of a Core Employment Area where industrial and warehouse uses are focused, not least its close proximity to dwellings, including some relatively newly built dwellings along Addison Road ... The inclusion of this site in the adopted plan was intended to allow for an improvement of the relationship between employment and residential in this location and the development of this site for employment would undermine this"*
- 2.18 The co-existence of employment and residential uses is demonstrated by the adjoining Bellway development to the south of Meadow Road that fronts the designated Core Employment Area (including part of the Site at Units 1 – 3 Meadow Road) to the north and west, beyond Milford Road.

- 2.19 The Council's position is simply unjustified, with a juxtaposition of the Core Employment Area adjacent to residential areas already present in the immediate vicinity of the allocation and indeed this juxtaposition already exists on site.
- 2.20 There has been no consideration of a reasonable alternative scenario whereby the site comes forward for employment uses (which are extant and have historically and continue to operate on the site) that can provide the "improvement of relationship" the Council wish to achieve through residential development.
- 2.21 CBRE IM have and will continue to promote the use of the site for employment purposes to establish a more job-intensive and efficient use of the site for employment floorspace adjacent to a successful Core Employment Area within the Borough.
- 2.22 In accordance with Paragraph 126 of the NPPF (2023):

"Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability.

Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped)"

- 2.23 The supporting evidence provided through planning application 25/1191 at the site, reiterated through CBRE IM's representations to the Regulation 19 consultation and again through these hearing statements, set out that there is no reasonable prospect of residential uses at the Site, with that being an unviable proposition.
- 2.24 It is not clear within the evidence base that the Council have considered the de-allocation of this site (on the basis no proposition of a residential application has come forward since the preparation and adoption of the existing Local Plan (2019) and indeed an alternative use has been proposed, nor whether the merits of securing additional employment land adjacent to a Core Employment Area have been fully assessed within the evidence base.

10.34 What is the basis for the scale, type, and use proposed? Is it justified?

- 2.25 CBRE IM do not consider the scale, type, and use proposed within the proposed allocation to be in any way justified within Policy WR3b.
- 2.26 CBRE IM have not promoted the site for residential use in any capacity, and have no intention, to promote or bring forward residential development on this site.
- 2.27 CBRE IM would reiterate that since the adoption of the Local Plan in December 2019, no proposition or applications for residential development has taken place. Rather, CBRE IM have attempted to bring forward an alternative use through planning application ref. PL/25/1191, as advocated by Paragraph 126 of the NPPF (2023) to regenerate the existing stock of commercial floorspace on site to meet an identified

need for flexible and start-up enterprises in the Borough with strong links to the strategic road and rail network.

- 2.28 Notwithstanding the above, including the active viable occupation and operation of commercial enterprises on site, the Council have **increased** the identified residential capacity of the site from a minimum of 39 units (within the adopted Local Plan) to between 40 – 61 units with no additional justification.
- 2.29 The HELAA incorrectly assesses the baseline status of the site (as reviewed in CBRE IM's comments in relation to Matter 3), however CBRE IM would reiterate that the conclusions of the HELAA, accounting for a 36% variance rate, only identifies a residential capacity of up to 33 dwellings.
- 2.30 The Council have not provided sufficient justification for the loss of the commercial floorspace (Talbot House) and employment land (occupied by an existing Bus depot) in proposing its release for residential uses.
- 2.31 The Council have not provided any evidence that the relationship between employment and residential can be improved through sensitively and carefully designed employment development, a position proposed by CBRE IM through its recent planning application.
- 2.32 Class E (Commercial, Business and Service) of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 allows for the use, part use, for a variety of services, including office, research and development and industrial processes that can be carried out “ *in any residential area without detriment to the amenity*”, with other employment generating uses being able to be mitigated through design or suitably worded planning conditions, as advocated by the NPPF.
- 2.33 Indeed, the existing commercial units (Units 1-3 Meadow Road) are overlooked by the recent Bellway development (171814) permitted and occupied south of Meadow Road.
- 2.34 CBRE IM therefore consider that the allocation of the site under Policy WR3b is not justified in any capacity in the scale, type, and use proposed.
- 2.35 The Policy as currently drafted is therefore unsound.

10.35 What is the site's status in terms of permissions or completions?

- 2.36 The area of the site covered by allocation WR3b site includes a large area of hardstanding, with commercial units sited along the northern boundary, including 8no. roller shutter doors for goods vehicles (Talbot House). The site is currently occupied by Green Metro Coaches Limited a bus depot operating on the hardstanding area and Talbot House.
- 2.37 The remaining area of CBRE IM control to the west, fully enclosed within the Richfield Avenue Core Employment Area, is occupied by Rocco Brands Group Limited (Unit 1), an online greetings card supplier, and Phantom Brewing Co. Limited unit 2 and 3).
- 2.38 The western half of the site comprises a series of 2 storey commercial units (and ancillary uses) with ornamental landscaping along the western edge. This commercial

units remain in active use and are sited within the Core Employment Area. Access to the western half of the site is gained via Meadow Road.

2.39 The eastern half site has the following relevant planning history:

- **200054:** Application for prior notification of proposed demolition. Approved March 2020.
- **211761:** Erection of a new perimeter fencing and sliding gate on the southern boundary, installation of new permeable hardstanding (above existing concrete hardstanding) and kerbing within the curtilage of industrial premises and installation of the proposed French drain to perimeter, catch pit and petrol interceptor and associated works in connection with existing car parking and storage use. Approved December 2021.

2.40 The above reaffirms the existing commercial status of the site, and longstanding operation of commercial uses on the site.

2.41 Although part of the site has been cleared following the demolition of an existing building in the eastern half of the site, the use of land remains in employment generating use occupied by Green Metro Coaches.

2.42 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”

2.43 The Applicant (CBRE IM) premised its application on the following grounds:

- 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.

2.44 The Officer Report for the Planning Application (ref. PL/25/1191) acknowledged that the site previously included a third industrial building in the east corner of the site that provided a further 2,400sq.m of employment floorspace close to the existing properties along Addison Road.

- 2.45 Thus, the presence of commercial enterprise in proximity to residential dwellings in this location is not uncommon and indeed the baseline position.

10.36 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.46 In contradiction to the findings of the HELAA (**Examination Documents EX016 and EX017**), where the viability position (including the acknowledged potential for contamination) was “not known”, the technical information provided in support of a full planning application 25/1191 and presented again through respective Hearing Statements (Matter 11), evidence that the the costs to development would render a housing development unviable.
- 2.47 CBRE IM consider that the site’s locational proximity to the Core Employment Area, and historic use for employment and commercial enterprise, a less vulnerable end-use for flood risk and contamination is a demonstrably viable alternative for development in this location.
- 2.48 As exemplified through the planning application material, a development would be able to suitably mitigate the risk of contamination, secure significant gains in biodiversity, provide BREEAM Very Good / Excellent buildings, with no objection on behalf of highways and compliance with daylight and sunlight regulations established by an independent technical consultant.

10.37 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- 2.49 No.
- 2.50 As set out within CBRE IM’s response to Matter 3 (Housing), the Site is not available for residential uses, with existing commercial occupation present on site, and the errors within the HELAA incorrectly considering the site available for residential development. As set out repeatedly through the Regulation 19 consultation and again through these hearing statements (to be read in conjunction with other submissions on behalf of CBRE IM), the site is **not available** for residential use.
- 2.51 The development of the site for residential uses is not realistically viable, as demonstrated within the Council’s evidence base (detailed in CBRE IM’s response to Matter 11) and within the viability appraisal that accompanied the planning application at the site under ref. PL/25/1191, but was not scrutinised by Officers or technical consultees (recognised within the Officer’s report to that application).
- 2.52 With the allocation being a ‘roll-over allocation’ from the Local Plan (which did not specify its delivery at the time of adoption (“longer term / unknown”), the LPPU now assumes delivery (without discussion with the landowner) in 2033/34. This is 15 years from its original allocation in the 2019 Local Plan and is not a realistic proposition, owing to the existing commercial enterprise that operate, the lack of a viable proposition for residential development, the lack of justification for the loss of employment space, and without the support of the sole land owner.
- 2.53 In this context, the site should be de-allocated from the Local Plan Partial Update, and the Council should robustly consider reasonable alternatives for this site.

10.38 Are there any main modifications required to the allocation for soundness?

2.54 Yes.

2.55 The site covered under the proposed policy WR3b should be de-allocated in accordance with Paragraph 126 of the NPPF (2023), that ensures planning policies need to reflect the changes in the demand for land, including where appropriate deallocating a site which is undeveloped.

2.56 To continue to allocate a site for a use that has no reasonable prospect of coming forward would not be justified, effective, nor consistent with national policy in enabling the delivery of sustainable development and would be unsound.

Turley Reading
The Pinnacle
20 Tudor Road
Reading
RG1 1NH