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Delivered by email

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Dear Jane,

Reading Local Plan Partial Update - Hearing Statement

Matter 10: Site-Specific Policies

Hearing Session: Session 4, Thursday 5th 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 only allocate part of the site, Sapphire Plaza, which in turn has not allowed for a pragmatic assessment of whether the CR10 Tall Buildings: Areas of Less Suitability for Tall Buildings Zone should be extended (over the road) across all or part of the unique island site that comprises Sapphire Plaza and Royal Court.

- 1.5. In tandem with the issues raised in response to Matter 3 regarding whether a proper assessment of the development potential of a combined Sapphire Plaza and Royal Court was undertaken, it is clear that the potential housing delivery of the wider site has not been satisfactorily reviewed, leading to a significant and unnecessary negative impact on housing delivery and which undermines a once in a generation opportunity to bring forward a meaningful and substantially beneficial regeneration of the wider site and its immediate surroundings.
- 1.6. For the reasons set out in this short statement, it is clear that as the Council's assessment of the initial Call for Sites submission for Site CR14z was erroneous there was no following assessment regarding whether to extend the Policy CR10 Tall Buildings: Areas of Less Suitability for Tall Buildings Zone. It is strongly contended that this was necessary to allow the higher elements of the proposed development scheme to come forward for consideration without the undue hindrance to height created by the 'in or out of zone' current nature of the Policy CR10 wording.
- 1.7. This statement responds to the Inspector's Matters, Issues and Questions (MIQs), as set out in ED EX037 and with specific reference to Matter 10: Site-Specific Policies. Only pertinent questions are responded to, as identified in following text, with the key focus of this Hearing Statement being on enhanced housing delivery.

2. Response to Matter 3, Issue 1

Issue 1: Are the policies for Central Reading justified, deliverable and consistent with national policy?

10.6 Is Policy CR10 justified, effective, consistent with national policy, and based on robust and up-to-date evidence? What is the justification for three clusters of tall buildings and areas of less suitability for tall buildings? How do areas of less suitability for tall buildings differ from the rest of the borough outside the clusters?

- 2.1 As set out in our response to Matter 3: Housing, including five-year supply of housing land, it is considered that the Council 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. To summarise that set out in our Matter 3 submission, at Stage 2b of the HELAA Site Selection Process (ED EV016), Royal Court was deemed potentially suitable on all criteria, save for the conclusions which determined that the reduction in site area required to provide a 10m offset from the riverbank, plus proximity of neighbouring residential windows to the south rendered any redevelopment unsuitable. Accordingly, 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.
- 2.3 This is considered to be erroneous in approach. If assessed as one single, combined site (as submitted to and recognised by the Council in Stage 1a of the HELAA process), it is clear that the wider development would be potentially suitable and would meet all assessment criteria, particularly as the site was nominated to come forward as a whole and for which substantial supporting technical evidence was submitted during the Local Plan process. In turn, the erroneous assessment of Royal Court and therefore the wider site, excluded the site from any consideration in terms of changes to Policy CR10 and the Tall Buildings zones.

- 2.4. In recognition of the above, we do not agree with the stated updates to Policy CR10 and submit that the Policy should be updated to include the wider Policy CR14z allocation, including both Sapphire Plaza and Royal Court. Notwithstanding this, the policy should be updated to provide more flexibility to allow sites outside of the proposed Policy CR10 zones to come forward, should they be able to pass to detailed testing in respect of *inter alia* Heritage, Townscape and Visual Impact (HTVIA), Daylight/Sunlight, Drainage and Wind and Microclimate matters, these criteria being set out within criterion vii) of the proposed updated Policy wording.
- 2.5. We make our case as the 2004 Planning and Compulsory Purchase Act requires general conformity with the overarching spatial strategy, which is intended to achieve housing supply in a housing market area suffering housing stress through optimisation of site capacity in the urban area of Central Reading. Further, the NPPF (2025) promotes the effective use of land in urban areas and criteria-based approach to design excellence and placemaking. We recognise this approach as being a means of achieving good place-making and increasing housing supply.
- 2.6. Turning to extant Policy CR10, policies that 'rule out' areas for tall buildings require a substantial, detailed, evidence base in order to be justified. Review of the submitted evidence base recognises that this level of assessment has not been comprehensively undertaken, despite further evidence being provided to justify the Council's current approach as set out in ED EV025 – Tall Buildings Strategy Update Note 2025, which we consider later in this document.
- 2.7. In general terms, it is encouraging that the Council seeks to address its policies to increase housing delivery. In this regard, Policy H2 as drafted seeks to set an increased minimum density based on the current average density of the town centre as a whole. The Council has equally taken a flexible approach to densities, as evidenced by the recent approvals at Station Hill (c. 500 dph), Broad Street Mall (c.600 dph), Aviva (>340dph) and 55 Vastern Road (275 dph).
- 2.8. Against this, it is recognised that Policy CR10 is too prescriptive – it unnecessarily places a limit to development that may otherwise be acceptable when considered against other policies of the Local Plan, particularly criterion vii) of that policy. Further, it is commonplace during the determination of planning applications for Policy CR10 to be applied as a ceiling by Officers, irrespective of location.
- 2.9. Part of the issue relates to the applicability of the original Tall Building Strategy ('TBS') to the current townscape. The TBS dates from 2008 and comprises a townscape and visual impact assessment. There was a partial update to the TBS in 2018; however, there were no relevant material differences arising from that update.
- 2.10. The TBS and the 2018 update taken together comprised the evidence base for the 2019 Local Plan and extant Policy CR10 Tall Buildings. Extant Policy CR10 identifies tall buildings as "10 storeys of commercial floorspace or 12 storeys of residential". The 2019 plan identified a limited number of areas as suitable for tall buildings (three in all), which in respect of the significantly higher housing pressures now in effect in the Borough is too binary and unnecessarily strictly locational.
- 2.11. Whilst a Tall Buildings Strategy Update Note ('TBSUN') was produced in May 2025, it is primarily a document aimed at retaining the status quo. The main conclusions set out in Paragraphs 2.45 – 2.47 and later in bullet form in Paragraph 8.1 recognise the more recent changes to national policy but consider that the core messages can be progressed within a largely unaltered approach to development in terms of both the wording of the Tall Buildings policy and the locations identified for tall buildings. This approach does not recognise the potential, subject to detailed testing, for

tall buildings to come forward in other locations, such as at Sapphire Plaza and Royal Court, as part of wider regeneration aspirations and this is considered to be inconsistent with the NPPF requirement to optimise housing delivery.

- 2.12. If assessing the wider site at Sapphire Plaza and Royal Court, the Council's review of Character Areas recognises that Character Area 21: Forbury South (immediately abutting the site to the north) and Character Area 26: Kings Road (in which the site is set) have low and medium townscape sensitivity to the inclusion of tall buildings respectively.
- 2.13. It is important to identify that the character areas are broadbrush and that this overview, whereby areas rather than sites have been assessed by the Council, can lead to a position where sites that are capable of providing significant height and density can be overlooked. This is no more pertinent than at Sapphire Plaza and Royal Court, which sit on an island site, surrounded by roads to the east, south and west and the Kennet Canal to the north, which provide separation from other developments, the closest of which to the site are modern in nature and of relatively significant height, with particular reference to Verto (17 storeys, directly north-west), Q2 (10 storeys, directly south-west) and Clarendon House (9 storeys approved as part of an implemented scheme, directly west of the site).
- 2.14. Figures 1 and 2 below and overleaf identify the location of the site in respect of the Council's Character Areas and the current wider site and its surroundings, which helps to demonstrate that Sapphire Plaza and Royal Court owe more to the character of the Forbury South buildings than the primarily lower scale residential buildings located to the south of Queens Road that characterise the Kings Road character area.



Figure 1 – Location of the site in respect of the Forbury South (21) and Kings Road (26) Character Areas

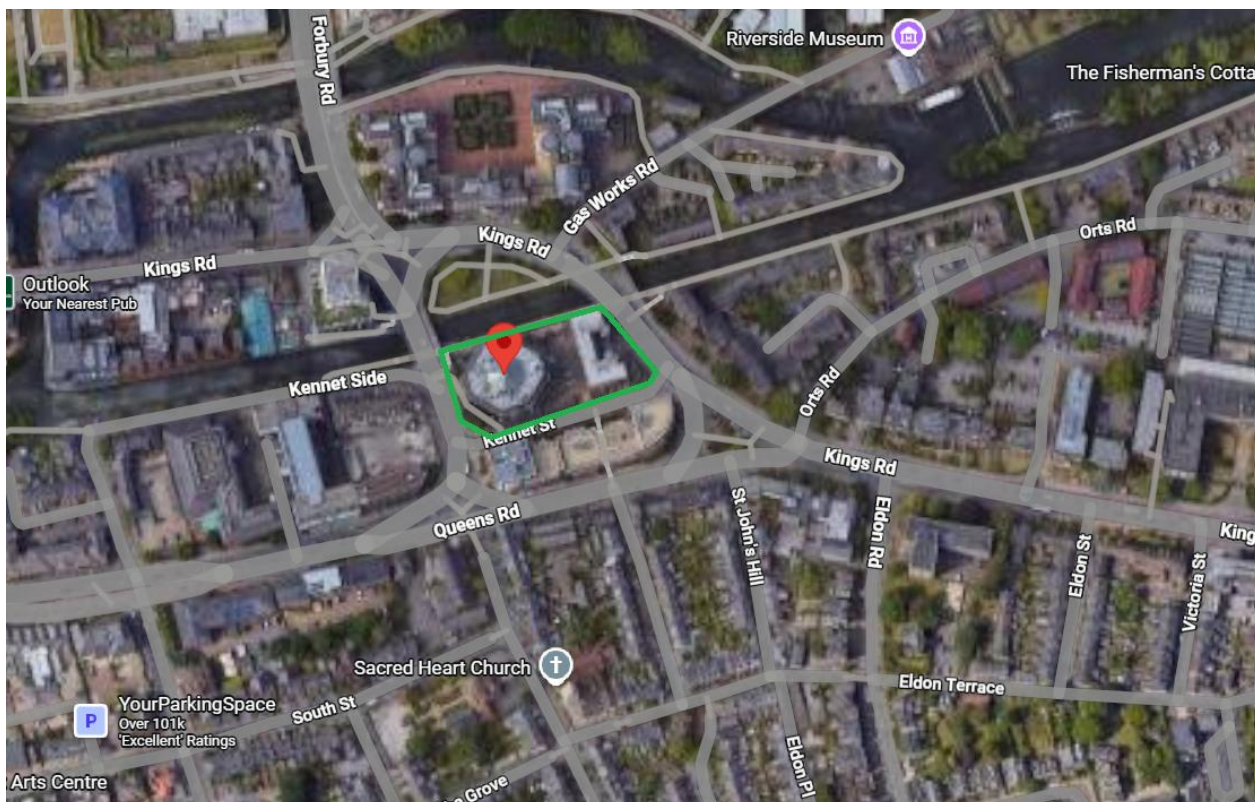


Figure 2 – Location of the site and surrounding area, Google Maps 2025

- 2.15. Viewpoint L, set out on page 79 of the TBSUN, also highlights the location of the twin spires of St. Johns and the Methodist Church, which are key townscape features in the area. Development of Sapphire Plaza and Royal Court does not unacceptably impact upon this viewpoint as the detailed HTVIA work undertaken to support our earlier Reg 19 submission evidences (ED LP007 3 of 6, Mapledurham Properties, ACG Vision Statement, Section 8 and Montagu Evans Note, dated December 2024).
- 2.16. In consideration of the significant detail submitted to the Council at Reg 18 and Reg 19 stage it is strongly contended that greater analysis of the case for including Sapphire Plaza and Royal Court within the expanded Policy CR10 zone should have been undertaken by the Council. The technical detail was provided by the client's Project Team, over two consultation stages, and it is clear in its conclusions that built form of over 12 storeys/36m in height is achievable.
- 2.17. Further, it is clear that including the development within the expanded Policy CR10 zone would not preclude the Council from determining an appropriate level of on-site built form at a later stage during the planning application process. It is in this respect that such a prescriptive policy is unwelcome and unnecessary in its current form – criterion i) of the proposed updated policy CR10 states that *'Within Reading Borough, tall buildings will only be appropriate within the 'areas of potential for tall buildings' as defined on the Proposals Map, other than as set out in criterion v'*, which in turn states that *'outside the three clusters and the 'areas of less suitability for tall buildings', tall buildings will not be permitted'* - as currently proposed, the Site falls just outside of the Tall Buildings zone and is adjacent both the Eastern Grouping (to the north west) and this proposed area of 'less suitability for tall buildings' (to the north).
- 2.19. The kind of blanket prohibition proposed in criterion i) and criterion v) of the draft policy require far greater detail than found in the current evidence base to the draft Local Plan Partial Update. This should comprise a full site appraisal alongside the consideration of design and historic

environment specifics, similar to that undertaken by Montagu Evans to support our client's Reg 18 and Reg 19 submissions. The updated evidence base simply does not include sufficient detail and has failed to consider some of the site-specific detail submitted for consideration.

- 2.20. The current drafting and restrictive nature of criterion i) and v) risks stifling development opportunities in areas not identified as suitable for tall buildings, whilst placing greater pressure on other areas, thus undermining the Council's strategic growth objective and wider spatial strategy which seeks to focus delivery on Central Reading.
- 2.21. The evidence base is not sufficiently robust as a basis to conclude that the tall building zone should not be extended to include the Site or that tall buildings should not be allowed outside the tall building zones or the identified areas of 'less suitability for tall buildings'.
- 2.22. We continue to identify the appropriateness of the site (Sapphire Plaza and Royal Court) as a location for a tall building and suggest an extension to the Eastern Grouping or adjacent area of 'less suitability for tall buildings' to include what is a unique island site within the town centre.
- 2.24. If it is not the intention to carry out a detailed evidence-based approach to inform the amendments to Policy CR10, then we suggest that specific wording amendments are made to policy criteria i) and v) to allow greater flexibility for other sites to come forward outside of the tall building zones where these meet the criteria set out under criterion vii).

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,



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Planning and Development Director

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