

**READING PRISON FRAMEWORK
SUPPLEMENTARY PLANNING DOCUMENT
REPORT OF CONSULTATION
MARCH 2015**

1. INTRODUCTION

- 1.1 This report summarises the consultation on the Outline Development Framework for the Site of Reading Prison, which was carried out for a period of six weeks from February to April 2014. It summarises the consultation measures undertaken in section 2, and discusses the results of consultation in section 3.
- 1.2 The next stage after consultation is to adopt the Framework as a Supplementary Planning Document (SPD). This is expected to take place in March 2015.
- 1.3 For any further information on this consultation exercise or the production of planning policy for the area, please contact the Planning LDF Team:

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2. DESCRIPTION OF CONSULTATION EXERCISE

- 2.1 Reading Prison closed in early 2014. In response to the closure and the potential use and development of the site for an alternative purpose, the Council decided to produce a Development Framework to guide proposals for this vital site.
- 2.2 The Council consulted on the Draft Outline Development Framework for a period of six weeks from 24th February to 11th April 2014. The consultation was sent to around 80 consultees, comprising individuals, organisations, developers and statutory consultees (a list of consultees is attached at Annex 2).
- 2.3 In addition to sending out the consultation, a press release was prepared and issued by the Council.
- 2.4 All documents were available to view on line via the Council's website, and at the Civic offices of the Council.

3. RESULTS OF CONSULTATION

- 3.1 Seven organisations responded to the consultation, although two of these responses were simply to state that there were no objections.
- 3.2 A number of points made were either support for the approach or minor wording issues. The main substantive responses that were made are summarised below:
- 3.3 Annex 1 contains summaries of each representation made, together with a Council response that details how the representation has been taken into account in finalising the document.

ANNEX 1: SUMMARY OF WRITTEN COMMENTS RECEIVED AND COUNCIL RESPONSE

Respondent	Document section/topic	Summary of response	Council response
The Council for British Archaeology Wessex Group	General	The Council for British Archaeology Wessex Group has learnt with interest of the proposals for the prison site, and has considered the two well-researched and useful documents that address the issues arising. The Group wrote recently strongly supporting the application to the Heritage Lottery Fund for enhancement of the ruins of the Abbey and their setting, and endorses the plans outlined in the Reading Prison proposals for public access and encouragement of understanding and engagement.	Noted. No change needed.
	General	The proposals if implemented seem likely to preserve the Listed Building; in addition to the points made about the derivation from Pentonville, we would add that the principles of the design seem to go back into the 18 th century, and the 'panopticon' advocated by the philosopher Jeremy Bentham. It is important that the building is retained and brought into suitable use.	Agreed. Change proposed. This element can be referenced in the Framework.
	3: Historical Importance and Heritage Assets	<p>The Scheduled Ancient Monument status of the site indicates its national importance. Reading Abbey from the 12th century onwards was one of the most important religious institutions in England. There are vague indications of an earlier nunnery, which might possibly have been on the same site, which is one reason why excavation is needed. The reports refer to the Viking encampment at Reading; the line of the earthworks described by a 9th-century writer have never been located, and one recent work has suggested that they lie to the east of the line indicated by Grenville Astill in his Archaeological Implications Survey of 1978, so it is possible that they could be located in the Abbey area. Astill also noted that the record indicates that there was already a royal centre at Reading, which might possibly be the source of the mid Saxon pottery found in excavation of the Abbey site in the early 1970s. Opportunity to investigate this further, and to explore the late Saxon urban history of Reading, should not be missed; any work undertaken must be to the highest standard, not merely evaluation and watching briefs.</p> <p>Reference: G. G. Astill, 'Reading', pp. 75-83 in <i>Historic Towns in Berkshire</i> (1978)</p>	Noted

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Thames Valley Police Crime Prevention Design Advisor	3: Historical Importance and Heritage Assets	There should be appropriate protection for the site to stop thieves gaining access, during demolition and archaeological explorations.	Agreed. Add note to the Framework
	4: Planning Framework	When the site is deemed suitable for development and it is decided what the site constraints are (due to archaeological finds and preservations), then I would wish to see design code points such as: 1. There should be appropriate links from the site to outside the site, but such as do not encourage anti-social behaviour and street drinkers from the town centre. 2. Active edges with good natural surveillance from active rooms at ground floor level. 3. Any car parking not hidden away but with good natural surveillance over from ground floor active rooms of dwelling occupiers.	Agreed. Requirements added to the Section on Design
	4: Planning Framework	The National Planning Practice Guidance (NPPG) sets out under 'Design' at 'paragraph: 006 Reference ID: 26-006-20140306, "What planning objectives can good design help achieve?"	Noted. Add references to National Policy
Natural England	General	Whilst we welcome this opportunity to give our views, we do not regard this Supplementary Planning Document as likely to impact on the natural environment to any significant extent. We do not therefore wish to comment.	Noted. No change needed.
English Heritage	General	We have made previous comments and are pleased to see that these have been largely addressed in this draft document.	Noted. No change needed.
	3: Historical Importance and Heritage Assets	We are particularly pleased to see that "archaeology is a prerequisite to any other consideration of the development of the site". We would, however, suggest that you use the revised list description, which I attach to this letter.	Noted. Change needed. The revised description will be added to the Appendices.
	General	At this stage we have no further comments but we would welcome continuing to be involved with future plans for the Prison, and we would be particularly pleased to have the opportunity to comment again when proposals are being firmed up and the appropriate assessments/evaluations have been commissioned and undertaken.	Noted. No change needed. English Heritage will be a key consultee in future development proposals.
Environment Agency	General	The Environment Agency has no objections or concerns to this document and support the detailed environmental constraints and design considerations on page 13 and 14 of the framework.	Noted. No change needed.
	4: Planning Framework	The south boundary of site falls within Flood Zone 2 as having a medium probability of flooding and the remainder within Flood Zone 1 as having a low probability of flooding. If the Council deem the site appropriate for residential development, a site wide	Noted. Change proposed. Whilst a Flood Risk Assessment is listed as a requirement for further information to be submitted, the Framework currently says little about flood

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		<p>sequential approach should be taken. This means more vulnerable land uses (such as residential) should be located in those parts of the site with the lowest flood risk. Areas at greatest risk of flooding should remain undeveloped. Following this, it will be appropriate to consider mitigation measures if required.</p> <p>To be acceptable, any development on this site would require a full Flood Risk Assessment (FRA). The developer should confirm as a minimum that the scheme will achieve a betterment in the surface water runoff regime; ensuring that surface water runoff will not increase flood risk to the development or third parties.</p> <p>An allowance for climate change needs to be incorporated, which means adding an extra amount to peak rainfall (20% for commercial development, 30% for residential).</p>	<p>risk on the site. A new section on flood risk should be added to section 4 to deal with the issues raised here.</p>
	4: Planning Framework	<p>It would also be a requirement to demonstrate how sustainable drainage system techniques (SuDS) will be used, with any obstacles to their use clearly justified.</p>	<p>Noted. Paragraph to be added about need for SuDS.</p>
	4: Planning Framework	<p>Current and historic uses associated with the Prison may have led to contamination on the Site. A (Preliminary Risk Assessment) PRA should be carried out prior to submission of any application in order to assess the risk of any contamination to the underlying aquifer (a principal aquifer) and the adjacent watercourses. The outcomes of your site investigations should inform the SuDS scheme you choose. For example, no infiltration should take place on parts of the site that have previously been impacted by contamination.</p>	
	4: Planning Framework	<p>There may be opportunities for ecological enhancement of the river corridor as this site has a river frontage to the south. Natural features encourage biodiversity, and can also create an attractive residential setting and add value to a development. We would strongly encourage any development to explore these opportunities.</p>	<p>Agreed. Change proposed.</p> <p>There may be opportunities to enhance biodiversity, and this will be mentioned in the Framework, but much will depend on historical assessments of the site and which parts will be subject to development or preservation.</p>
	4: Planning Framework	<p>Under the terms of the Water Resources Act 1991, and the Thames Region Land Drainage Byelaws 1981, prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank/foreshore of the River Kennet, designated a 'main river'.</p>	<p>Agreed. Change proposed.</p> <p>This will be referred to in the Framework.</p>
Climate Change Centre Reading	General	<p>Overall we fully agree with the Framework, however we feel the prison could be used whilst unoccupied, until detailed planning applications are put forward. We believe the site is a perfect opportunity to build upon London's success with the recent opening</p>	<p>Make reference to use for a sustainable education centre(possibly as a short term use while the planning and conversion of the prison is being undertaken to promote various green project solutions;</p>

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		<p>of the 'Crystal- sustainable cities initiative', and create Reading's own sustainable education Centre for the public. We put forward the idea of using the site during the period of 2014-2020 as a functional space to let local community groups use the prison as a sustainability hub to promote Reading to become a greener place to live and work in towards beyond zero emissions and zero waste. The "Learning Centre" will promote various green project solutions and can also be a testing facility for monitoring and analysing local community project for the council. A Live Public Prison could be an astonishing example of public space, where our global network of leading <i>Placemakers</i> could add value to Reading's planning and urban green development. We want to improve pedestrian and bike access to the prison via Forbury Gardens, from Reading train station. Also a possible new "prison tunnel" which would run under / over the A329 towards the Forbury Retail Park.</p> <p>Making use of the prison's exterior walls as a vertical garden promotes the prison as a green hub. The building would also be an excellent example of a sustainable community engagement, with PV-solar panels temporarily fitted on the roof areas or vertically on the walls to maintain all energy needs (With our expertise in this area, we would offer a free feasibility study). This would turn the site into an outstanding usage of a historical building without altering the structure. We want to strive for community usage of the site in order to preserve its heritage qualities but also as a sustainable landmark for the future, with the Reading (Berkshire) County Gaol, the Abbey of Reading and the Forbury Gardens linked together via the Kennet and Avon canal, with open access to the public and tourism. We believe that the modern part of the prison should also be an advisory exhibition of the Reading Museum.</p>	<p>Refer to improving pedestrian and cycle access, and signage, from the station to the Abbey Quarter and the Prison via Forbury Gardens.</p>
	General	<p>We understand after the period is up, the prison will return to the hands of the Reading Borough council who have already evaluated future usage of the historic site and building i.e. a permanent Berkshire hotel should enhance the settings of the Reading Abbey and Forbury Gardens.</p>	<p>Reading Borough Council has no ownership of or other legal interest the Prison Site and there is no reason for it to have any such interest.</p>
Robert Rizzo	General	<p>There is a beautiful park next door with a music stand, the beautiful abbey ruins next door, a great and famous hotel next door, parking and a retail park across the road, lots of offices all around and a main road running along it. You also have in the prison many cells that could be enlarged at little cost to make bigger ones by knocking two into one.</p>	<p>Noted.</p> <p>The Reading Prison site is not owned by the Council and the Council will not benefit financially from its future use. . The Framework seeks to guide the future use and development of the site by landowners/ developers.</p>

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		<p>These would make ideal retail units for rental to entrepreneurs who would love a small space to display and sell small a variety of goods or items of their own. Exercise yards in the prison would convert to staff car parks or outdoor sport areas. You also have kitchens and toilets this makes great sense to have fast food outlets and maybe outdoor seating in the yards continental style.</p> <p>The area was very badly used in the past especially as a Christmas market last year, think how much this sort of very low cost conversion would allow the council to capitalise on this site from all the facilities and conveniences around it</p> <p>With the new Railway station, and all the large towers envisaged by some people around the new station it would become a great place for lunch or shopping also a fantastic tourist attraction as where Oscar Wilde and other famous people were imprisoned and at the same time giving the council a great revenue from rent and rates while the tenants use their own money to embellish the cells, decorate the site and improve the area into a great place to go to on dull and sunny days.</p> <p>If on the other hand you build another office block there, it definitely kill off the area altogether and a great opportunity to do something quaint, costing little to the council yet bringing people from afar. To go shopping in a prison is in itself something people will enjoy visiting as a day out. Do not sell it or make it into some sort of museum, do not allow someone else to profit from the Reading council's great site, Reading should exploit the positive ideas that will benefit the people living in the area and bring people in from as far as London and Bristol with the new fast rail.</p>	<p>The comment notes the many advantages of the setting of the prison site, and it is agreed that a development or reuse of the site should capitalise on many of these important elements. Links with the Abbey Quarter project are particularly vital.</p> <p>In terms of specific proposals, the challenges of dealing with the historic significance of the site makes it difficult to be too prescriptive in requiring certain uses, because in doing so the Council risks rendering a beneficial future use of the site that preserves its historic significance unviable. Making structural alterations to the listed building, such as knocking cells together, would also require a great deal more consideration and justification in conjunction with English Heritage. However, the Framework can certainly include pointers towards some of the types of uses suggested in this comment.</p> <p>Make reference in the framework to public access and public use of the site. The framework sees the prison site as being an integral part of the wider Abbey Quarter and seeks use of the prison site providing attractions and uses that will complement the leisure, arts and culture, tourism, learning and interpretation, commercial and open space uses of the Abbey Quarter</p> <p>Use for offices forms part of the local plan allocation for the site so cannot be prohibited.</p>
Gareth & Elaine Warwick	General	We are very pleased that this site will be sympathetically developed as it will improve further a part of Reading that holds significant historical and cultural importance and one that we and our fellow residents enjoy living in.	Noted. No change needed.
	4: Planning Framework	We support development of the site for uses such as culture and arts especially with links to the Abbey Quarter, educational both in terms of education linked to the site and for wider educational needs such as a school, independent retail and arts centre with workshops / studios etc, we also support limited residential development but are concerned about major commercial	Noted.

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	development such as chain retail or leisure developments and hotel use. We also have reservations about more office development in the area especially any more buildings that tower over the Abbey Quarter.	
General	Following the Council closing off the Forbury Gardens at night and the Abbey permanently on public safety grounds and to protect property from vandalism we have as a result seen a significant amount of anti-social behaviour (ASB) mainly after dusk being transferred to where we live both alongside our homes and in the gardens of Abbots House behind our homes. This has put our property and residents at risk. We have had verbal and physical threats and a major fire as a result. We would like to understand what measures the Council plans to put in place to curb ASB as part of the wider development of this area and how they intend to work with the us to find solutions that fit all needs not just the Councils.	References to designing for crime and to ASB added to the design advice in the framework. Comments passed to officers dealing with the Abbey Quarter for reference in the development of proposals for the area.
General	We would like to be involved in the development process so our views can be heard and our recommendations acted upon. As without wider consultation and consideration we believe we will continue to suffer from issues such as the closure of the Abbey and the Forbury Gardens as detailed above. Even small considerations like the type of railings used to close off the Abbey can have repercussions on the residents and our property, for example, as they are extremely inadequate at keeping people out we have to endure the impacts from ASB taking place in the Abbey grounds, such as stones been thrown into our property damaging cars, noise coming from people drinking and partying in the Abbey and people climbing out of the Abbey into our property.	The framework indicates that, "As part of the pre-application process, the Council will expect the prospective applicants to carry out consultation on the draft application proposals. .." Although the council cannot compel prospective applicants to undertake pre-application consultation, it is strongly recommended and promoted. There will be statutory consultation in respect of any planning application.
	Clear signage and access needs to be considered remembering that residents live very close to this site. It would be helpful if clear routes are marked and signage used so that the impact to us from pedestrian traffic and particularly vehicle traffic is minimised. For example, we would prefer the small gate outside 12 Abbots Walk to remain shut at all times to minimise pedestrian noise and privacy impacts and for road signage, as you approach the road, to be clear that Abbots Walk is a dead end and that there is no through route minimising the number of vehicles, including large articulated vehicles, lost or trying to find the Abbey that have to turn around in the drive way to our homes. There has been building damage to Abbots House and the railings in front of our homes in the past from vehicles trying to turn around in the drive way to our property or in Abbots Walk which is quite narrow.	The Prison cannot be accessed by vehicles via Abbots Walk. Comments passed to officers dealing with the Abbey Quarter for reference in the current development of proposals for the Abbey Quarter.

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		We would like to understand what prioritisation and then ongoing financial support will be available for the existing historical buildings in the area. Whilst the development of the Prison is a fantastic opportunity it would be a shame to see funds that could have been invested in the Abbey and the Gateway being spent there whilst these sites continue to languish uncared for. As an example it has taken 30 years to get the listed cemetery wall at Saint Laurence's church repaired - albeit we are very happy that at last it will be repaired.	The current development of proposals for the Abbey Quarter involving Heritage Lottery and Council funding provide significant funding towards stabilising the Abbey ruins and repairs to the Abbey Gateway structure and associated
		Consideration should be given to small things like dealing with the increased litter more visitors will bring and their needs for things such as more well sign posted public toilets. It would also be nice if other parts of the Government's remit such as the Crown Court could be brought on side so that they no longer continue to permit the littering of the Abbey Quarter by failing to provide cigarette bins and adequate litter bins for their users.	
		We would like consideration to be given to any noise and pollution that may impact us both during construction of the site and from whatever is eventually built on the site.	Noted. No change needed. Where there is a likelihood of development affecting nearby residents, a Construction Method Statement would generally be a condition of any planning permission.
Mr D Willson, Whitley	General	The prison could be used for a variety of purposes including Exhibition space that would celebrate famous Reading personalities, the history of the Prison, histories of minority struggles, along with future of Reading exhibitions, management suite, café and associated workshops and storage.	Noted.

ANNEX 2: INDIVIDUALS AND ORGANISATIONS CONSULTED ON THE DRAFT OUTLINE DEVELOPMENT FRAMEWORK

Abbots Walk (Reading) Ltd	Peacock & Smith
Age UK Reading	Pegasus Planning Group
Ancient Monuments Society	Peter Brett Associates
Aviva Life Pensions UK Ltd	Planning Potential
Barton Willmore	Quod
BDS Chartered Surveyors	Rapleys
Bell Cornwell Partnership	RCRE
Berkshire Archaeology	Reading Chronicle Environment Correspondent
Boyer Planning	Reading Civic Society
Boyes Turner	Reading CTC District Association
Broadway Malyan	Reading Cycle Campaign
Campbell Gordon	Reading Friends Of The Earth
CBRE	Reading Muslim Council
CgMs Consulting	Reading Transport Ltd
Confraternity of St James	Reading Urban Wildlife Group
Council for British Archaeology	Reading Voluntary Action
D2 Planning	Reading Youth Cabinet
David Lock Associates	Royal Berkshire Fire And Rescue Service
Day Tanner Partnership	RPS (Swindon)
Drivers Jonas Deloitte	RPS Planning (Milton)
DTZ Piedad Consulting	SAKOMA
English Heritage South East Region	Savills (London)
Environment Agency Planning Liaison	Savills (Oxford)
Federation Of Tenants & Residents Associations	Scott Brownrigg
Firstplan	Skandia Property Fund
Fryer Commercial	Society for the Protection of Ancient Buildings
Garden History Society	Sport England
GVA Grimley	St James Church
Halson Mackley Partnership	Thames Valley Police
Hicks Baker	Thames Valley Police - Crime Prevention Team
Highways Agency Network Strategy	Thames Water Property Services Ltd
Hives Planning	The Canal & River Trust
Jones Lang LaSalle	The Council Of British Archaeology
Lambert Smith Hampton	The Victorian Society
Ministry of Justice	Transport 2000
Mr Alok Sharma MP	Turley Associates
Mr Robert Wilson MP	UBS Global Asset Management (UK) Ltd
Nathaniel Lichfield And Partners	University Of Reading
National Offender Management Service/HM Prisons	Vail Williams LLP
Natural England	Wolf Bond Planning
P J Planning	