

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ENVIRONMENT AND NEIGHBOURHOOD SERVICES

TO:	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT COMMITTEE		
DATE:	4 APRIL 2017	AGENDA ITEM:	8
TITLE:	DRAFT LOCAL PLAN		
LEAD COUNCILLOR:	COUNCILLOR PAGE	PORTFOLIO:	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT
SERVICE:	PLANNING	WARDS:	ALL
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1. EXECUTIVE SUMMARY

- 1.1 The Council is replacing its existing development plans (the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document) with a new single local plan to set out how Reading will develop up to 2036. Consultation on the first stage, Issues and Options, which was a discussion of what the content of the plan should be, was undertaken between January and March 2016. Committee is asked to approve the responses to the representations received (Appendix 3).
- 1.2 This report seeks Committee's approval to undertake community involvement on a Draft Local Plan (Appendix 1) and associated documents including a Proposals Map (Appendix 2) showing the geographical extent of the policies and proposals in the Draft Local Plan. Community involvement will then be undertaken, which will feed into production of a revised Draft Local Plan later in 2017.

2. RECOMMENDED ACTION

- 2.1 That the Draft Local Plan (Appendix 1) and Draft Proposals Map (Appendix 2) be approved.
- 2.2 That community involvement on the Issues and Options for the Local Plan and associated supporting documents be authorised.

- 2.3 That the Head of Planning, Development and Regulatory Services be authorised to make any minor amendments necessary to the Draft Local Plan in consultation with the Lead Councillor for Strategic Environment, Planning and Transport, prior to community involvement.
- 2.4 That the responses to the representations made on Issues and Options for the Local Plan (Appendix 3) be approved.

3. POLICY CONTEXT

- 3.1 The Local Plan sets out the planning policies for an area and is the main consideration in deciding planning applications. The local plan for Reading, previously referred to as the Local Development Framework, currently consists of three documents - the Core Strategy (adopted 2008, amended 2015), Reading Central Area Action Plan (RCAAP, adopted 2009) and Sites and Detailed Policies Document (adopted 2012, amended 2015).
- 3.2 Various changes have meant the need to review the Local Plan. In particular, the publication of the National Planning Policy Framework (NPPF) in 2012 has meant significant changes, in particular the need for local planning authorities to identify their 'objectively assessed development needs' and provide for them. The need to review the local plan as a single, comprehensive document was identified in a Local Development Scheme, which is the programme for producing planning policy documents, the latest version of which was agreed by this Committee on 23rd November 2016 (Minute 15 refers).

4. THE PROPOSAL

(a) Current Position

- 4.1 The first stage of preparing the Local Plan was consultation on Issues and Options. An Issues and Options for the Local Plan document was approved by this Committee on 24th November 2015 (Minute 22 refers), and consultation was carried out between January and March 2016. The results of the consultation were reported to this Committee on 5th April 2016 (Minute 34 refers).
- 4.2 Around 200 representations were received on the Issues and Options document, and these have been taken into account in drawing up the Draft Local Plan. Responses have been drafted to the individual points made, and these are attached at Appendix 3. Committee is asked to approve the responses to representations.

(b) Option Proposed

- 4.3 Committee is recommended to approve the Draft Local Plan (Appendix 1) and Proposals Map (Appendix 2) for community involvement.
- 4.4 The Local Plan, once adopted, will be the main document that will inform how planning applications are determined. As such, it covers a wide variety of areas, from overall strategic matters such as the scale of development, to individual sites and policies on detailed matters. In replacing the three existing development plan documents, it seeks to carry forward existing policies wherever they are still relevant with only minor alterations or updates. This is particularly the case for many of the detailed development management policies, and also for a number of the allocated sites where development has not yet taken place. In other parts of the document, policies have been rationalised where the policy areas were previously split across more than one document, as is the case for example for residential conversions or biodiversity.
- 4.5 However, there are a number of areas where the policy approach would change significantly from the existing plans. The most important of these are summarised below.
- 4.6 **Housing need:** As set out in the Issues and Options document, a joint study with the other Berkshire authorities (Berkshire Strategic Housing Market Assessment (SHMA), February 2016) identified a high level of need for additional 16,100 homes, or 699 per annum, to 2036. Since the publication of that report, work has been undertaken on whether the full level of need can be accommodated within the Borough. As a result of that work, the Draft Local Plan (policy H1) sets a housing provision of around 15,100 homes, which equates to 658 homes per annum. It is considered that this is what Reading can realistically accommodate over the plan period. This leaves 1,000 homes as 'unmet need'. The Council is working jointly with the other three authorities in the Western Housing Market Area (West Berkshire, Wokingham and Bracknell Forest) to seek to accommodate these homes elsewhere in the area. This work is ongoing.
- 4.7 In terms of distribution of the housing, around half (51%) would need to be accommodated in Central Reading. Of the remainder, 21% would be expected to be in South Reading, 17% in West Reading and Tilehurst, 6% in East Reading and 5% in Caversham and Emmer Green.
- 4.8 Reading's housing needs should be considered against the wider background of the joint work that is going on across the four authorities. This included publication of a West of Berkshire Spatial Planning Framework in December 2016, which identified areas of search for significant levels of growth. One of these areas, which was also subject to a joint expression of interest under the Garden Villages programme, was an area around Grazeley, south of Reading, for 15,000 homes. This would largely be within Wokingham and West Berkshire, although a small

part of the area is marginally within Reading's boundaries. The Draft Plan seeks to recognise the possibility of this proposal and to ensure that the policies and proposals are set in this context.

- 4.9 **Employment need:** The Council once again co-operated with its neighbours to assess the need for new employment floorspace. The Central Berkshire Economic Development Needs Assessment (November 2016) identified a reasonable level of need for offices (53,000 sq m), and in particular for industrial and warehousing space (148,000 sq m). The need for offices would mainly be accommodated within the town centre, and is in any case largely covered by existing planning permissions. The need for industrial and warehousing is more challenging to meet. The Draft Local Plan aims to meet these needs within the Borough, although in the case of industry and warehousing, this is dependent on a large allocation of land around Island Road (see paragraph 4.20 of this report).
- 4.10 The high level of positive need for new space also means a continuing need to protect existing space. For that reason, most of the existing employment areas continue to be subject to protection through policy EM3. In some locations, where the loss of the employment space would have limited effects, and where it makes sense to achieve proper planning of the area, it is proposed to bring forward some current employment or commercial sites for housing. This includes the eastern fringes of the Richfield Avenue area and some land south of Elgar Road, as well as a handful of smaller sites elsewhere.
- 4.11 **Affordable housing:** The Berkshire SHMA continued to identify a very strong need for new affordable housing throughout the plan period. As the affordable housing policies in the existing plan were updated relatively recently, in 2015, and were based on reasonably up-to-date evidence, there are not proposed to be major changes to the level of affordable housing sought (see policy H3). However, there do need to be changes to the operation of the requirements on small sites, to exclude like-for-like replacements and conversions of existing dwellings, as a result of the Court of Appeal decision relating to contributions towards affordable housing from small sites. This is in line with the approach agreed by this Committee on 13th July 2016 (Minute 7 refers). The level of affordable housing sought is currently set at the level which it is viable to deliver in Reading. Further work on viability will be undertaken before the next draft of the Local Plan, and this will inform whether there is scope to increase the proportions sought.
- 4.12 **Sustainability policies:** There have been significant changes to the expectations for the standard to which new developments have been built since the existing plans were adopted. This includes the withdrawal of the Code for Sustainable Homes. However, given the continuing need to minimise the impact of new development, and the aims of the Climate Change Strategy, the Draft Local Plan has high levels of expectation for the performance of new buildings. The expectation is that, on major sites, all new homes will be zero carbon (policy H4). For

non-residential developments, new development is expected to meet BREEAM Excellent levels (policy CC2).

- 4.13 **Heritage:** The section on heritage has been substantially expanded within the Draft Plan. Previously, it was covered within a single, reactive policy in the Core Strategy, but now there is a much more positive strategy for the historic environment, covering policies H1 to H6. These seek to take positive measures to conserve and enhance Reading's heritage wherever possible, taking account of resource constraints, and to make more of the Borough's significant heritage interest.
- 4.14 **Open spaces:** The Borough's key open spaces remain subject to strong policy protection, although some of the mechanisms for doing so have changed. The National Planning Policy Framework introduces the concept of 'Local Green Space', with certain criteria for selecting such spaces, which mean that some of the most important open spaces are also protected through national policy. Policy EN7 lists the protected open spaces. National policy no longer supports the protection of significant swathes of countryside as open space, although those areas that are in Reading Borough still have policy protection through landscape or biodiversity designations, and due to their location within the floodplain.
- 4.15 **Housing standards:** The Government has sought to rationalise the different standards that various authorities apply to new homes in their area. The approach has generally been to use Building Regulations as a base level, and then set a single 'enhanced' national standard that local authorities can opt into through their Local Plan. The matters covered are water efficiency, accessibility and internal space. It is proposed that the Local Plan requires this higher standard for water for all new homes, for internal space for all new homes outside the centre, where it is much more difficult to achieve. For accessibility, it is proposed that all new homes are 'accessible and adaptable', which is broadly equivalent to the existing Lifetime Homes requirement, whilst a proportion should be 'wheelchair user dwellings'. Policy H4 summarises this (as well as the zero carbon homes requirement).
- 4.16 **Specific forms of housing:** New policies are introduced on various types of housing. A policy on student accommodation seeks a focus on existing further and higher education campuses or on reconfiguration of existing sites (policy H11). A criteria-based policy on sites for gypsies and travellers is included (policy H12, similar to the existing Core Strategy), but, as a result of a recent Gypsy and Traveller Accommodation Assessment, it is anticipated that the next draft of the plan will need to consider whether provision of a transit site can be made within the Borough boundaries. The Government also has strong expectations that Local Plans make an allowance for self-build, and a proportion for self-build would be sought from larger sites (policy H2).

- 4.17 **Major transport projects:** The Draft Plan in policy TR2 includes an up-to-date list of transport projects for which provision will be made, including Mass Rapid Transit, Green Park Station and Interchange, Reading West Station, Cow Lane Bridges and National Cycle Network Route 422.
- 4.18 **Changes of use:** Various changes have been made to planning use classes and permitted development rights since the production of the existing plans, and these need to be reflected in the Draft Local Plan. For instance, planning permission is no longer needed to change from A1 (retail) to A2 (financial and professional), and since planning permission to change from A2 to A1 was not previously needed, this means that for practical purposes they have to be treated as the same use (see policy RL3). However, permission is now needed to change to a betting shop and payday loan company, and policy RL4 seeks to avoid a proliferation of such uses. Changes are also proposed within the town centre, where the previous largely permissive approach has been changed to retain a strong retail element within key frontages (see policy CR7).
- 4.19 **Area-specific sections:** The Borough is split into five areas (central, south, west, north and east), with a section including principles and an overall strategy for each area (sections 5-9). These area-specific sections also include the identified sites within each area.
- 4.20 **Identified sites:** Whilst many of the unimplemented sites from existing plans are carried forward, the high levels of need for additional development have meant the need to identify more sites. Some of the most significant new or amended sites are summarised below:
- CR11: Station/River Major Opportunity Area - this existing allocation from the RCAAP is carried forward, and expanded to include some additional sites including Apex Plaza and some areas west of Caversham Road.
 - CR12: West Side Major Opportunity Area - this existing RCAAP allocation is largely updated to take account of matters such as the completion of Chatham Place, and the changes to the proposals for Hosier Street.
 - CR13: East Side Major Opportunity Area - the changes to this existing RCAAP allocation are largely updates to reflect recent completed developments.
 - CR14a: Central Pool - identified for residential development subject to swimming provision being addressed.
 - SR1: Island Road Major Opportunity Area - a collection of sites around Island Road have been identified as an opportunity to meet the bulk of Reading's industrial and warehouse needs. This includes the former Smallmead landfill.
 - SR3: South of Elgar Road Major Opportunity Area - an area centred on the existing Makro site on Elgar Road has been identified for a significant residential development in the long-term.
 - SR4a: Pulleyn Park, Rose Kiln Lane - this site contains car dealerships and a builders merchant, and is identified for housing

- SR4c: 169-173 Basingstoke Road - these industrial sites to the east of Basingstoke Road are surrounded by residential, and their redevelopment for residential would support a better relationship between uses in the area.
- SR4f: Land South West of Junction 11 of the M4 - this area could potentially form part of any development at Grazeley, dependent on the overall plan for the area.
- WR3a, 3b and 3c: Various sites at the eastern edge of the Richfield Avenue employment area have limited future for employment use, and their redevelopment would enable a better relationship between employment and housing.
- WR3d: Rivermead Leisure Centre - the site is identified for additional leisure provision, which could include swimming.
- WR3s and 3t: Land at Kentwood Hill and Armour Hill - these two sites are land where there has been historic allotment use but have been scrub for some years, with little prospect of future allotment use. It is proposed that they are developed for housing, with the remainder of the area protected as Local Green Space.
- CA1b: Part of Reading Golf Club, Kidmore End Road - a development of part of this site for residential and a new clubhouse has been identified.
- CA2: Caversham Park - a new policy on Caversham Park has been produced, which highlights the potential to convert the house and enhance public access, but also notes the significant heritage, biodiversity and landscape constraints.
- ER1e: St Patrick's Hall, Northcourt Avenue - the site is identified for additional student accommodation, subject to retention of the locally-listed Pearson's Court.
- ER1j: Palmer Park Stadium - the site is identified for additional leisure provision, which could include swimming.
- ER3: Royal Berkshire Hospital - a new policy on future expansion of the hospital is included, which seeks to balance the need to serve Reading and surrounding areas with the issues affecting the site such as car parking.

4.21 **Infrastructure:** A separate Infrastructure Delivery Plan is under production, which shows how the growth proposed in the Local Plan will be supported by adequate infrastructure. A summary of the schedule of the IDP is included within section 10 of the Plan.

4.22 Alongside the Local Plan, a Proposals Map (Appendix 2) has been prepared. The Proposals Map shows the geographical extent of the policies and proposals in the Local Plan. It shows the boundaries of sites identified for development and of areas subject to specific policy designation, such as protection as open space, landscape designations or protected employment areas. It also shows important contextual information, including conservation areas, scheduled ancient monuments and major hazard sites.

(c) Other Options Considered

4.23 There are two alternative options that could be considered to producing the Local Plan;

- Not to produce a Local Plan; or
- To produce a 'Preferred Options' document at this stage rather than a full draft.

4.24 There are two main disadvantages to not producing a Local Plan:

- It would leave the Borough without a fully up-to-date plan. This would leave the Council vulnerable to appeals, particularly as we now have published levels of housing need. Therefore, the Council would lose control over the form of development.
- The Council may be subject to special measures. In a written statement to Parliament in July 2015, then planning and housing minister Brandon Lewis stated that a deadline of early 2017 applies for Local Planning authorities to produce a Local Plan. He said that "In cases where no Local Plan has been produced by early 2017 - five years after the publication of the NPPF - we will intervene to arrange for the Plan to be written, in consultation with local people, to accelerate production of a Local Plan". Although no guidance was given on how far along with production authorities are expected to be, having a draft plan published in early 2017 means that intervention in Reading is considerably less likely.

4.25 Producing a 'Preferred Options' at this stage would mean giving an indication of the likely policy direction without drafting policies in full. This is the approach that was taken on the Core Strategy and Reading Central Area Action Plan. However, given the constraints of the Borough, which limits the degree to which different spatial options are available, it is considered that a Preferred Options stage adds little value. It is likely that two full drafts of the Local Plan will be required to accommodate any changes as a result of consultation, so a Preferred Options would be an additional stage that would only introduce additional delay.

5. CONTRIBUTION TO STRATEGIC AIMS

5.1 The Local Plan, through setting out the way Reading will develop to 2036, will contribute to the following priorities in the Corporate Plan 2015-18:

- Safeguarding and protecting those that are most vulnerable;
- Providing the best life through education, early help and healthy living;
- Providing homes for those in most need;
- Keeping the town clean, safe, green and active;
- Providing infrastructure to support the economy;
- Remaining financially sustainable to deliver these service priorities.

6. COMMUNITY ENGAGEMENT AND INFORMATION

- 6.1 The Council's consultation process for planning policy, as set out in the adopted Statement of Community Involvement (adopted March 2014), is that the widest and most intensive community involvement should take place at the earliest possible stage, to allow the community a genuine chance to influence the document. Therefore, a significant and wide-ranging community involvement exercise on Issues and Options took place between January and March 2016, involving workshops, exhibitions and an online questionnaire. The Draft Local Plan consultation will be more focused, and will largely be based around making the document available for comment, although it is also expected to feature drop-in events and attendance at local community meetings.
- 6.2 Consultation is expected to begin late in April and last for a period of six weeks. Responses received will be considered in preparing a Pre-Submission Draft Local Plan later in 2017.

7. EQUALITY ASSESSMENT

- 7.1 The Sustainability Appraisal of the Draft Local Plan incorporates the requirement to carry out a screening stage of an Equality Impact Assessment. A full Sustainability Appraisal that examines the effects of each policy and development site within the plan will be published alongside the consultation. It is not expected that there will be any significant adverse impacts on specific groups due to race, gender, disability, sexual orientation, age or religious belief.

8. LEGAL IMPLICATIONS

- 7.1 Local Development Framework documents are produced under the Planning and Compulsory Purchase Act 2004. The process for producing local plans is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 states that a local planning authority should consult on what a local plan should contain. This Draft Local Plan has been produced within this Regulation 18 requirement.

9 FINANCIAL IMPLICATIONS

- 9.1 Production of the local plan will generally be carried out within existing budgets. However, there are some elements of producing the plan that can have significant resource implications, depending on how they are carried out.
- 9.2 Consultation exercises can be resource intensive. However, the Council's consultation process is based mainly on electronic communication, which helps to minimise resource costs.
- 9.3 Another main area where there can be significant financial implications is in producing the evidence base, particularly where the use of external

consultants is required. Much of the evidence required from external consultants has already been assembled, including housing, economic and retail needs, flood risk and transport modelling, which means that these costs will be limited in the remaining period of plan production. Many of these pieces of work were jointly commissioned with neighbouring authorities, which has reduced the costs. Consultants will only be used where they genuinely represent the best option in terms of value for money.

- 9.4 Finally, the other significant cost is a public examination, which will be required for the Local Plan. These examinations can cost tens of thousands of pounds. They are an inescapable fact of producing development plans, although the length and scope of these examinations can be minimised by seeking to resolve objections before the examination, as well as by combining documents into one document with one examination, as is the case with the Local Plan. This cost will fall within the 2018-19 financial year.

Value for Money (VFM)

- 9.5 The preparation of a local plan will ensure that developments are appropriate to their area, that significant effects are mitigated, that contributions are made to local infrastructure, and that there are no significant environmental, social and economic effects. Robust policies will also reduce the likelihood of planning by appeal, which can result in the Council losing control over the form of some development, as well as significant financial implications. Production of the local plan, in line with legislation, national policy and best practice, therefore represents good value for money.

Risk Assessment

- 9.6 There are no direct financial risks associated with the report.

BACKGROUND PAPERS

- Planning and Compulsory Purchase Act 2004
- Localism Act 2011
- The Town and Country Planning (Local Planning) (England) Regulations 2012
- National Planning Policy Framework
- Local Development Scheme 2016
- Berkshire Strategic Housing Market Assessment, February 2016
- Central Berkshire Economic Development Needs Assessment, November 2016