

## UPDATE REPORT

BY THE EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: 4 October 2022

ITEM NO. 10

**Ward:** Whitley

**App No.:** 212037/REG3

**Address:** Land adjacent to Reading Sewage and Treatments Works, Island Road, Reading

**Proposal:** A gypsy and traveller transit site intended for short-term use while in transit. It will comprise 7 pitches, bin store, outdoor seating area, play area, and a new access onto Island Road. Each pitch comprises a kitchen/toilet block and space for two caravans and two cars

**Applicant:** Reading Borough Council

**Deadline:** Extension of time agreed until 14 October 2022

### RECOMMENDATION:

As per the recommendation in the main agenda Committee report.

#### 1. Additional information regarding Flood Risk

- 1.1 Since the publication of the main agenda report, the following clarification can be provided in respect of Flood Risk.
- 1.2 Paragraph 6.31 states *“on the basis of the above, whilst the application has passed the Sequential Test and so complies with the NPPF and Policy EN18, it remains in conflict with criterion v) of Policy H13.”*
- 1.3 However, as noted at paragraph 6.30, *“National policy is that development in such areas should be ‘water compatible’ only”*. This is the guidance given in the National Planning Policy Guidance (NPPG) Flood Risk Vulnerability Classification Document which states that unless proposals are ‘Water Compatible’ or ‘Essential Infrastructure’ (which would require the Exception Test to be undertaken) then development should not be permitted in Flood Zone 3b. This is irrespective of whether the proposal is classed as ‘More Vulnerable’ or ‘Highly Vulnerable’. The proposal is not classed as ‘Water Compatible’ and nor is it ‘Essential Infrastructure’. As such, the proposal is not considered to be compliant with the NPPF in that it is a ‘More Vulnerable’ use located in Flood Zone 3b.
- 1.4 However, whilst there is a technical conflict with regards to compatibility, the main report is clear that the Sequential Test has been passed and, importantly, the Flood Risk Assessment shows the proposal to be safe, without increasing flood risk elsewhere. Balanced against the critical need for the facility and the absence of alternative sites, alongside the wider sustainability benefits to the Borough that the site would afford (as detailed in the main agenda report), officers advise that this continues to outweigh the harm identified.
- 1.5 Given the above acknowledgement that there is a degree of conflict with

national flood risk policy, it is no longer considered appropriate for flooding matters to form part of the matters that weigh in favour of granting planning permission in the Conclusion section of the report and paragraph 7.2 of the main report should therefore be amended as follows:

*“From the discussion within this report, the following weighs in favour of granting planning permission:*

- 1. It has been adequately demonstrated that there is a need for a transit site in the Borough and there is Policy support (H13) in the adopted Local Plan;*
- 2. the applicant has demonstrated that a site search has established that the proposed use is not able to be accommodated on any other site within the Borough and has explained that the Council, as a Local Authority, is currently failing to provide accommodation for these people;*
- 3. the proposed transit site is considered to be comparatively well-located in terms of accessibility to services and facilities; and*
- 4. in terms of flooding and strategic site suitability, the proposal is found to be acceptable.”*

- 1.6 This does not change the conclusions reached in the main agenda report in terms of flood risk as the site passes the sequential test and importantly would be safe for occupiers. It also remains the case that any residual harm in respect of flood risk would be tempered by key site-specific circumstances in terms of the overriding need for the development, the lack of alternatives, as well as the on-site risk and its management (to be secured by condition). It is notable that whilst Reading Borough Council’s Emergency Planning Team have raised an objection to the proposals in respect of its location within the Detailed Emergency Planning Zone (DEPZ) no specific concern has been raised regarding flood risk or access and egress.

## **2. Additional Information regarding Alternative Sites**

- 2.1 Since the publication of the main agenda report, the following clarification can be provided regarding the availability of alternative sites.

- 2.2 A report of all sites assessed was produced in 2017 by Reading Borough Council Planning Policy Team. This looked at the availability of 80 sites and the report can be viewed here:

[Gypsy and Traveller Provision Background Document.pdf \(reading.gov.uk\)](#)

- 2.3 The report comprised all Council-owned land above 0.15ha apart from sites that:

- a. Are identified as protected open space within the Draft Local Plan or provide statutory allotments; or
- b. Are occupied by an in-use building or buildings.

- 2.4 The Planning Policy Manager has confirmed that this is the only assessment of suitability that was made when identifying the 80 sites. This means that many sites were included that were patently unsuitable for gypsy and traveller use for reasons that included their small size and location within amenity land associated with residential areas. Sites were also located

much closer to people's homes than the site subject of this application. The above report, which was published in 2018, provides the reasoning for why all the referenced sites were rejected, including the site subject of this application - which was rejected in part due to flooding risk concerns.

- 2.5 The report initially led to the identification of the Cow Lane site as a potential transit site. However, this site could not be brought forward due to its requirement for the operation of Reading Festival and nearby proposal for new secondary school at Richfield Avenue.
- 2.6 The lack of availability of the Cow Lane site reopened the search and sites that had previously been discounted due to flood risk were brought back into consideration, including the site Island Road site. This was enabled in part due to a distinction in national policy between permanent and temporary uses of caravans within flood zones which had not previously been considered when originally assessing the 80 sites referenced in the above report. The Planning Policy Manager has confirmed that the site subject of this application remains the only site available for the proposal.
- 2.7 With regard to the location of the site within the DEPZ, the Policy Manager has also confirmed that this issue only arose in 2020 after the above report was published and therefore was not taken into account. It is noted that a number of other sites assessed, but discounted, are also located within the DEPZ.

### **3. Matters made in Representation**

- 3.1 All material considerations have been addressed in the main agenda report.
- 3.2 A number of concerns are raised in respect of the cost to the Council in respect of implementing the proposed scheme. Officers would advise that the decision to proceed with implementing any permission that might be granted is entirely a decision for the applicant.

### **4. Conclusion**

- 4.1 The recommendation remains as set out in the October 2022 main agenda Committee report.

**Case Officer: Ethne Humphreys**