

**Reading Borough Local Development Framework
Sites and Detailed Policies Document – Public Examination**

Address for correspondence:
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Kieran Roughan
Reading Borough Council
Via E-mail

25th January 2012

Dear Mr Roughan,

Reading Sites & Detailed Policies DPD – Main Modifications

Firstly let me apologise for not writing to the Council until now. Unfortunately I was ill for the first two weeks of January which meant that I was unable to complete my site visits until last week.

You will be aware that the amended sections 20-23 of the Planning and Compulsory Purchase Act 2004 Act came into force on 15 January 2012. The effect of this in relation to your Examination is that where your Plan needs modifications to make it sound, I will not be able to recommend these 'main modifications' unless the Council make a specific request under new section 20(7C).

I explained at the hearings that I would write to the Council after the hearings and the completion of my site visits to identify those parts of the DPD where main modifications (referred to during the hearings as 'focused changes') were considered necessary. These are set out in the attached Appendix 1. You will see that they are few in number, limited in their scope, and do not alter the overall direction or thrust of the DPD. In essence they involve the deletion of two policies relating to housing sites, two amendments to the boundaries of Major Landscape Features, and the correction of errors in the housing trajectory.

In the light of the potential soundness issues identified it would be helpful if you could indicate how you wish me to proceed. As you will be aware, in order for me to make modifications to the Plan you will need to formally notify me whether you wish to request modifications under section 20(7C).

In the absence of a request under section 20(7C), there is the likelihood that my report will identify any soundness failures and, if there are such failures, recommend non-adoption of the Plan. An indication of the Council's position on the main modifications at this time will be advantageous to the efficiency of the examination process and the expectation of participants.

The main modifications would need to be set out in a suitably referenced Schedule (see the format in the attached Appendix 2) and accompanied by inset maps showing any changes to the Proposals Map. The modifications would need to be the subject of Sustainability Appraisal and public consultation. This would involve

**Inspector: Mr C Anstey BA (Hons) DipTP DipLA MRTPI
Programme Officer: Amy Lomas/ Christelle Beaupoux**

consultation with representors, as well as wider publicity in the local newspaper and on the LPA website for a period of 6 weeks. Any representations received on these main modifications would be taken into account by me during the Examination. Although it is regrettable there will be some delay in the Council receiving my report I am sure you will appreciate the need to follow appropriate procedures.

As you will also be aware minor changes are now known as 'additional modifications' and can be made by the Council on adoption without the need to be examined. These changes are ones that do not, when taken together, materially affect the policies set out in the Plan. The legislation quite clearly envisages these are a matter solely for the Council, for which they will be accountable on adoption. In practice they should be of the nature of corrections and clarifications which do not change the meaning or scope of a policy and would not need to be the subject of consultation or revised Sustainability Assessment (SA). They are no longer within the scope of the examination and consequently there will be no need to endorse them during the examination. Notwithstanding this the Council is advised to examine all additional modifications to ensure that they have been correctly categorised.

I shall be grateful if you would indicate how you wish me to proceed as regards the main modifications. Given the effort and resources that has expended in the process to date I am confident that the Council will endeavour to do all it can to secure a Plan capable of adoption.

Yours sincerely

Christopher Anstey

Planning Inspector

APPENDIX 1 – MAIN MODIFICATIONS

1. **Policy SA5. Park Lane Primary School, The Laurels and Downing Road – delete policy.** It has not been clearly shown that the Downing Road Playing Fields are surplus to requirements or whether there is scope in the local area to provide compensatory replacement provision. Consequently as this policy is not justified by the evidence and contrary to national planning policy it is unsound and should be deleted.
2. **Policy SA8. Land at Kentwood Hill – delete policy.** Both the site allocated in the DPD and the enlarged site advanced by the site owner would result in piecemeal development that is not well related to the surroundings. There would be uncertainty as to the future of surrounding parcels of land. A comprehensive approach is required that deals with all the land between Kentwood Hill and Armour Hill (including the builders' yard, unused land, the allotments, and playing field) having regard to the needs of the area. Consequently as this policy is not justified by the evidence and contrary to national planning policy it is unsound and should be deleted.
3. **Policy SA17: Major Landscape Features – revise boundaries.**
 - i. *The Kennet and Holy Brook Meadows.* The inclusion of the land south of Island Road within the Kennet and Holy Brook Meadows Major Landscape Feature is not consistent with the criteria for designation. The Proposals Map should be revised to exclude the land south of Island Road from this Major Landscape Feature.
 - ii. *The East Reading wooded ridgeline.* The identification of parts of the Whiteknights Campus north of Pepper Lane as a Major Landscape Feature is not consistent with the criteria for designation. The Proposals Map should be revised to exclude the Whiteknights Campus from the Major Landscape Feature.
 - iii. Unless the Proposals Map is amended in accordance with these revised boundaries Policy SA17 would be unsound as it is not justified by the evidence.
4. **Housing Trajectory – revise figures.** There is an element of double-counting within the projected completion figures in the housing trajectory contained in Appendix 1 of the submitted plan. This means that the projected completions are higher than should have been the case. Consequently the figures need to be corrected to ensure that this part of the DPD is based on accurate information. This will also give the Council the opportunity of updating the housing figures in the light of recent information, including the deletion of the sites referred to above.

APPENDIX 2 – MAIN MODIFICATIONS FORMAT

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission DPD, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	20	3.4	This document will <u>forms</u> part of... [Delete this example]
MM2	32	WC17	<i>In the last line:</i> ...the <u>potential</u> rail station... [Delete this example]
MM3	44	8.1	<i>Delete the paragraph.</i> [Delete this example]

Mr C Anstey.

Our Ref:
Your Ref: PPS1/88194

Direct: ☎ 0118 937 4530
e-mail: kiaran.roughan@reading.gov.uk

26th January 2012

Your contact is: **Kieran Roughan Planning Policy Manager**

Dear Mr Anstey,

RE: Reading Sites and Detailed Policies Document - Main Modifications

Thank you for your letter concerning 'main modifications' which was received by email via the Programme officer on 25th January 2012. I am writing to seek some clarification of the 'main modifications' and the reasons for the changes that you are seeking.

Policy SA5. Park Lane Primary School, The Laurels and Downing Road. I do not recall that the question as to whether the Downing Road Playing Fields are surplus to requirements was specifically referred to as part of the examination. It was not a specific question set for the examination in relation to the consideration of the site and I do not recall specific discussion of the matter at the hearing.

The evidence that the Council presented, and which I do not recall being challenged, was that all needs for a single site school can be accommodated on the site of the Laurels. In addition, the approval of the Secretary of State for Education for the disposal of the Downing Road Playing Fields provides clear evidence that he has accepted that there would no longer be an educational need for the site as part of the single site school, in effect that the playing fields are surplus to requirements. I am therefore not clear as to why you have reached the conclusion that this was not justified by the evidence or how it is contrary to national planning policy.

In relation to your reasoning that it has not been clearly shown whether there is scope in the local area to provide compensatory replacement provision, evidence was presented at the examination and a suggested modification presented to clarify the current position. The accompanying text to the policy clearly indicates that any application (and it was agreed that, in the current economic environment, such an application is several years away) involving the loss of the playing field would have to address whether there is an excess of playing field provision in the catchment or the provision of replacement playing field. While there was discussion of compensatory provision in answer to the specific questions you set for

the consideration of the site and during the hearing on the site, I do not recall that there was focussed questioning or evidence presented that would have led to the conclusion that you have reached.

I also wonder whether any concerns you may have over this matter could be overcome by the less drastic means of introducing some additional wording in the policy and/or in the accompanying text. I have therefore proposed a suggested change to the relevant bullet point within Policy SA5 that specifically refers to the Downing Road site. This is attached at Annex 1, along with a further modification to paragraph 13.2.8 (in red), to further clarify the situation. Would this or a similar 'minor' wording change overcome your concerns?

Policy SA8. Land at Kentwood Hill

You indicate that a comprehensive approach is required that deals with all the land at Kentwood Hill. However, it appears to me that, as worded in your letter, your conclusion will leave the future of the site uncertain and lacking clarity.

You have not asked for any changes to the areas of Public and Strategic Open Space (SA16) around Kentwood Hill. As shown on the Proposals Map, all parts of the Tilehurst Allotments area, apart from the proposed allocation SA8a, were proposed to fall under SA16. We are assuming that you are satisfied that there are no 'main modifications' needed to SA16 and the Proposals Map as a result of the deletion of SA8a. The area of SA8a will become "white" land with the remaining land being open space.

Need for additional consultation and Sustainability Appraisal

For every development site that we allocated, we identified a 'no policy' or 'no allocation' option. These options, like all other options for the sites and policies, were subject to sustainability appraisal, and consultation as part of the sustainability appraisal. Therefore, 'do not allocate' options for all elements of the SA5 allocation were appraised in the Sustainability Appraisal of the Pre-Submission Draft Sites and Detailed Policies Document (PSD-003), as well as the Sustainability Appraisal of the Revised Pre-Submission Draft Sites and Detailed Policies Document (RPS-003), and therefore subject to consultation in both 2010 and 2011 - see references SA5a(i), SA5b(ii) and SA5c(iii) in the above documents. Likewise, for Kentwood Hill, a 'do not allocate' option was appraised in the same documents at the same times - see reference SA8a(i). As well as the need to examine as wide a range of options as possible, one of the main reasons we did this was to make sure that, were specific sites to be deleted at Examination stage, we would not need to re-consult or re-appraise. We would like to know your views on this. Clearly, we realise that this does not affect the need for consultation and Sustainability Appraisal of the Major Landscape Feature issue.

I assume that the Council's request to the Inspector to make main modifications needs to be made after the consultation and sustainability appraisal processes have been carried out. Is this correct?

Thank you for your consideration of the above.

Yours sincerely,

Kieran Roughan
Planning Policy Manager

Annex 1 Suggested Change to Policy SA5

- The Downing Road Playing Fields will be developed for residential (45-55 units) and open space. Appropriate public open space provision, including a play area, should be provided as part of any development to mitigate the loss of the private playing fields and to provide an appropriate setting for the existing public footpath that forms the western boundary of the site. In addition, appropriate new or enhanced playing field provision shall be provided elsewhere in the area to compensate for the loss of the playing field. Resolution of highway and access issues on Downing Road will be required. Hedgerows and trees should be retained.*

13.2.8 The Downing Road Playing Field is a fenced area of private, recreational space. It is proposed for residential development and open space. Its disposal is essential to realise the significant community benefits of providing a new primary school on a single site to serve the Tilehurst area. The disposal of the Downing Road Playing Field has been approved by the Secretary of State for Education (under Section 77 of the School Standards and Framework Act 1998). Some public open space provision, including a play area, should be provided as part of any development to mitigate the loss of the private playing fields and to provide an appropriate setting for the public footpath adjoining the western boundary of the site. Any application involving the loss of the primary school playing field should make appropriate new or enhanced playing field provision elsewhere in the area to compensate for the loss of the playing field and the fact that the re-provision within the single school site does not fully replace the area that is lost. The loss of the playing fields may attract objections from Sport England unless it is demonstrated that there is an excess of playing field provision in the catchment or replacement playing field provision is provided. In addition, an area of open space is to be retained as part of any development. ~~There may be scope to provide replacement provision at the Blagrave Recreation Ground area and the enhancement of playing pitch provision in that location.~~ Developers should examine the possibility of serving some of the development via a separate access from Beverley Road. The site is proposed for residential development although the provision of specialist accommodation, e.g. care home, elderly units, would be appropriate in this very accessible location.

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Kieran Roughan
Reading Borough Council
Via E-mail

27th January 2012

Dear Mr Roughan,

Main Modifications

Thank you for your response of 26 January 2010. I shall be grateful if you would consider the following additional comments.

Policy SA 5: Park Lane Primary School, The Laurels and Downing Road.

I do not dispute that there would no longer be an educational need for the the Downing Road playing field in the event of re-provision on a single school site at The Laurels. However my reference to 'surplus to requirements' is made in terms of PPG17. This national guidance indicates that existing open space (including school playing fields) should not be built on unless it has been demonstrated that they are surplus to requirements. With specific regard to playing fields there is a need to establish that there is an excess of playing field provision in the catchment or that replacement playing field provision can be made. In my judgement the evidence submitted does not clearly establish that the Downing Road playing field is surplus to requirements in terms of PPG17. Consequently as Policy SA5 is not justified by the evidence and contrary to PPG17 it is unsound.

Notwithstanding this I have given some thought as to whether Policy SA5 could be changed in some way to address my concerns as to soundness. To this end there may be scope to include wording in the actual policy to the effect that the Downing Road Playing Field will only be released for residential development if it has been previously demonstrated that the open space is surplus to the requirements of the local area, and that there is an excess of playing field provision in the catchment or replacement playing field provision can be made. This would mean some significant re-casting of the policy to ensure that there is no automatic presumption in favour residential development on the playing field. The approach would have to be carefully explained in the supporting text. Such changes would I believe be a main modification. Your thoughts would be welcomed. I would be pleased to comment on any wording that you care to draw up on this matter.

Policy SA8 – Kentwood Hill

The deletion of this policy would mean that the builders' yard is not allocated in the DPD and shown as undesignated (as most of the land in Reading is shown on

Inspector: Mr C Anstey BA (Hons) DipTP DipLA MRTPI
Programme Officer: Amy Lomas/ Christelle Beaupoux

the Proposals Map). Consequently in essence the existing use would remain. The surrounding land would continue to be protected by Policy SA16. Consequently there would be a clear policy for the area.

I accept that in due course a planning application for the site could well be submitted. In my opinion there would be strong grounds for the resistance of such a proposal on the basis that it constitutes piecemeal and uncoordinated development that relates poorly to the surroundings. However this is clearly my planning judgement and someone else may give more weight to the removal of a builders' yard, albeit one that doesn't appear to cause any significant amenity or visual problems. To this end there may be grounds to introduce a new policy in the DPD specifying that the piecemeal development of land at Kentwood Hill will not be permitted and that proposals should have regard to the wider area and local needs. Your comments on this suggestion would be welcomed.

I believe that the most sensible way forward would be to prepare a Planning Brief for all the land at Kentwood Hill that takes account of site factors and local needs (including the need for allotments, visual impact, unused/overgrown land, constraints etc) - however this is a matter for the Council and/or the land owner to progress, although it could be referred to in the text of the DPD.

Consultation & SA

I am concerned to ensure that all interested parties are able to comment on all main modifications - even deletions. Consequently all main modifications require consultation. I will take into account all additional representations received. It is also sensible to produce a separate SA on the main modifications, however short, even if this is just reproducing what has already been done.

Yours sincerely

Christopher Anstey

Planning Inspector

2nd February 2012

Your contact is: **Kieran Roughan Planning Policy Manager**

Dear Mr Anstey,

RE: Reading Sites and Detailed Policies Document - Main Modifications

Thank you for your emails, responding to my letter of 26th January 2012, in which you clarify the conclusions set out in your letter dated 25th January 2012. We now have a clearer appreciation of the conclusions set out in your letter.

I respond below to the individual matters raised in your letter of 25th January 2012, taking account of the contents of your emails. Subject to your response to the matters below, we are moving towards being able to formally notify you that the Council will be requesting main modifications to the Submission Document under Section 20(7C).

Policy SA5. Park Lane Primary School, The Laurels and Downing Road.

Thank you for the opportunity to modify this policy to satisfy your concerns. In response to your email, we have drafted a suggested main modification to the policy and supporting text for policy SA5. This is attached at Annex 1. We have phrased the policy in terms of relevant national policy, as this is likely to change in the very near future, rather than repeating the tests in PPG17. We have, however, included the current PPG17 tests in the supporting text. I would also be happy to move paragraphs 13.2.8 forward so that it sits in front of paragraph 13.2.5 if that is considered preferable.

I would be grateful for your comments on the suggested wording.

Policy SA8. Land at Kentwood Hill

In line with your conclusions on this policy, officers will propose that the Council requests the deletion of the policy and the removal of any supporting wording.

Notwithstanding this change, we are concerned that the wording of your conclusion on SA8, as set out in your original letter, could be misinterpreted in relation to the future of the wider area. As drafted, it could be construed that you are advocating significant residential development on all or part of the allotments. Whilst not presuming to dictate the wording of your conclusions, can I request that you consider revising the paragraph, possibly along the following lines:

1. Policy SA8. Land at Kentwood Hill - delete policy. *Both the site allocated in the DPD and the enlarged site advanced by the site owner would result in piecemeal and uncoordinated development that is not well related to the surroundings. ~~There would be uncertainty as to the future of surrounding parcels of land. While the designation of the allotments area as open space (excluding the established builder's yard) on the proposals map, will provide a clear policy protection for the area, the Council may wish in the future to consider a more comprehensive approach~~ ~~is required~~ that deals with all the land between Kentwood Hill and Armour Hill (including the builders' yard, unused land, the allotments, and playing field) having regard to the needs of the area. Consequently as this policy is not justified by the evidence and contrary to national planning policy it is unsound and should be deleted.*

Policy SA17: Major Landscape Features - revise boundaries.

Officers will propose that the Council requests the modification of boundaries for the Major Landscape Features on the Proposals Map, as detailed in your conclusions.

Housing Trajectory - Revise figures.

Officers will propose that the Council requests the update and correction of the Housing Trajectory, as detailed in your conclusions. This will include the deletion of housing figures from Land at Kentwood Hill. It will also include the deletion of housing figures from any sites making up part of SA5, since the release of the playing field as worded in Annex 1 is contingent on justification in terms of local and national policy. A suggested change to Appendix 1 of the Submission Document is detailed in Annex1 to this letter.

Subject to your response to the points set out above, we would hope to present a report to Council at the earliest opportunity recommending that a request is made to the Inspector under Section 20(7C) that the proposed main modifications detailed in the report be accepted. The intention would be to carry out statutory consultation on the main modifications and associated sustainability appraisals as soon as possible after the Council Meeting.

Thank you for your consideration of the above.

Yours sincerely,

Kiaran Roughan
Planning Policy Manager

13.2 Park Lane Primary School, The Laurels and Downing Road

13.2.1 Park Lane Primary School in Tilehurst, Reading is a 2 Form Entry (2FE) Primary School. The school currently operates from a split campus across four separate sites. This arrangement is unsatisfactory from an education point of view and it is proposed to consolidate a new school, library and health centre on a single site at the Laurels, funded in part by the potential sale of surplus sites at Park Lane and Downing Road.

SA5: PARK LANE PRIMARY SCHOOL, THE LAURELS AND DOWNING ROAD

The existing Park Lane Primary School and associated playing fields, hard play areas, car parking and associated facilities will be reprovided on a single extended site at the Laurels, School Road, Tilehurst.

~~*If required to support the scheme, the Downing Road Playing Fields will be released for residential development subject to it being demonstrated that the loss of the open space is justified under relevant national and local policy. Development should provide 45-55 units together with appropriate public open space, including a play area, will be developed for residential (45-55 units) and open space. Appropriate public open space provision, including a play area, should be provided as part of any development to help mitigate the loss of the private playing fields and to provide an appropriate setting for the existing public footpath that forms the western boundary of the site. Resolution of highway and access issues on Downing Road will be required. Hedgerows and trees should be retained.*~~

~~*As a result of the re-provision of the Park Lane Primary School on a single site, the existing Park Lane School Site and its Annex off Downing Road and the Downing Road Playing Fields will be released for development as follows:*~~

~~*The main Park Lane School Site will be redeveloped for residential purposes (15-20 dwellings) with access off Downing Road and Chapel Hill. Development should address the practicality of retaining elements of the existing building within any new scheme.*~~

~~*The Park Lane School Annex will be reused/ redeveloped for community or residential purposes, subject to safeguarding the amenity of occupiers of adjacent properties.*~~

~~*The Downing Road Playing Fields will be developed for residential (45-55 units) and open space. Appropriate public open space provision, including a play area, should be provided as part of any development to mitigate the loss of the private playing fields and to provide an appropriate setting for the existing public footpath that forms the western boundary of the site. Resolution of highway and access issues on Downing Road will be required. Hedgerows and trees should be retained.*~~

Aim of the Policy

13.2.2 The policy aims to facilitate the rationalisation of the primary school provision (as described below) and guide the future development of the surplus sites. It helps to achieve core objective 2 of the Core Strategy by creating good access to education and housing.

Reason for the Policy

- 13.2.3 As part of a major rationalisation project, it is proposed to build a replacement 2FE Primary School (to include a separate Early Years Nursery provision) on the existing Infant School Laurels site. The existing site will be enlarged by taking in additional publicly owned areas of land as part of the site assembly for this project. The scheme will provide new, bespoke designed school buildings, in conjunction with the required external playing field areas sufficient to meet the minimum requirements for a school of this size along with a new 2-court MUGA hard court provision.
- 13.2.4 The total site area of the 4 parcels of land that comprise the existing school extends to 2.6695ha (26,695 sqm). The Proposals Map shows the relative location and the extent of each of these sites.
- 13.2.5 The existing Park Lane School exists on 4 widely separated sites, which is far from ideal in terms of providing a satisfactory primary education environment. In addition, the suitability and condition of its buildings and outdoor play areas is far from ideal in relation to modern education practice. The proposal involves the development of a single site school on the site of the Laurels incorporating the existing Blagrove Nursery, Tilehurst Library and Tilehurst Health Clinic and utilising, and reconfiguring, part of the existing recreation ground for school playing fields and outdoor play. The existing Blagrove Nursery school site would be returned to public open space and incorporated into Blagrove Recreation Ground with enhanced facilities.
- 13.2.6 The Junior part of the school comprises two built sites along with a playing field located at the end of Downing Road. The main school site which fronts onto Park Lane, with entrances from Chapel Hill and Downing Road, contains an extended Victorian brick building with a grassed frontage to Park Lane and hard play areas to the rear. The site contains a number of trees. National Policy in PPS5 (published in 2010) gives further weight to the conservation of local heritage assets even where they are undesignated, and requires that applications affecting heritage assets, including local heritage assets such as Park Lane School, should be accompanied by information on the significance of the asset using appropriate expertise, and that there is a presumption in favour of conservation of the asset. Any development of the site should address the practicality of retaining and converting parts of the existing school building. The site is proposed for residential development although the provision of specialist accommodation e.g. care home, elderly units would be appropriate in this very accessible location.
- 13.2.7 The Annex site contains a single storey prefabricated building with frontage to the eastern side of Downing Road. The depth of the site is only 13 metres which is very shallow and it backs on to houses and gardens that front Park Lane/ School Road. The site and existing building is provisionally reserved for a police office and a facility for the Tilehurst Horticultural Society. Residential would be an appropriate alternative use of the land, subject to regard being paid to the amenity of occupiers of adjacent properties.
- 13.2.8 The Downing Road Playing Field is a fenced area of private, recreational space. The release of open space will need to be clearly justified in terms of both national and local planning policy. Policy CS28 of the Core Strategy states that development of open spaces would only be permitted if replacement open space, to a similar standard, can be provided at an accessible location close by, or that improvements to recreational facilities on remaining space outweighs the loss. In relation to current national guidance (PPG17), the Downing Road Playing Field would only be released for residential development if it has been demonstrated that the open space is surplus to the requirements of the local area, and that there is an excess of playing field provision in the catchment or replacement playing field provision could be made. The disposal of the

Downing Road Playing Field has been approved by the Secretary of State for Education (under Section 77 of the School Standards and Framework Act 1998).

13.2.9 If loss of the playing field is adequately justified, some public open space provision, including a play area, should be provided as part of any development to mitigate the loss of the private playing fields and to provide an appropriate setting for the public footpath adjoining the western boundary of the site.

13.2.10 Developers should examine the possibility of serving some of the development via a separate access from Beverley Road. If the loss of the playing field is justified, the site is proposed for residential development although the provision of specialist accommodation, e.g. care home, elderly units, would be appropriate in this very accessible location.

~~13.2.8 The Downing Road Playing Field is a fenced area of private, recreational space. It is proposed for residential development and open space. Its disposal is essential to realise the significant community benefits of providing a new primary school on a single site to serve the Tilehurst area. The disposal of the Downing Road Playing Field has been approved by the Secretary of State for Education (under Section 77 of the School Standards and Framework Act 1998). Some public open space provision, including a play area, should be provided as part of any development to mitigate the loss of the private playing fields and to provide an appropriate setting for the public footpath adjoining the western boundary of the site. Any application involving the loss of the primary school playing field may attract objections from Sport England unless it is demonstrated that there is an excess of playing field provision in the catchment or replacement playing field provision is provided. In addition, an area of open space is to be retained as part of any development. There may be scope to provide replacement provision at the Blagrove Recreation Ground area and the enhancement of playing pitch provision in that location. Developers should examine the possibility of serving some of the development via a separate access from Beverley Road. The site is proposed for residential development although the provision of specialist accommodation, e.g. care home, elderly units, would be appropriate in this very accessible location.~~

How will the Policy be achieved?

13.2.911—The sites in this policy are in Council ownership, and this policy will therefore be implemented primarily by the Council. The policy will also be achieved through the development management process, including on the surplus sites.

How will the Policy be monitored?

See overall monitoring of development for different uses (section 16)

Other Suggested Modifications as a Result of Changes to SA5

In Figure 14 (Appendix 1) for SA5 make the following changes:

SA5	Downing Road, Park Lane	<u>Residential development dependent on justification of</u>
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	School and the Laurels	<u>loss of playing field. If loss justified, allocation is for 60-75 dwellings, but this figure is excluded from the total below. 60-75</u>
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Revise the total provision to exclude the 60-75 dwellings.

In Figures 15, 16a and 16b (Appendix 1) exclude the 68 dwellings assumed for site SA5 from the projected provision.

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Kieran Roughan
Reading Borough Council
Via E-mail

6th February 2012

Dear Mr Roughan,

Thank you for your letter of 2 February and the attached annex.

SA5

The revisions go some way to meeting my concerns as to soundness but there are couple of remaining matters. Please could the Council have a look again at that part of the policy and the supporting text that deals with the re-provision of POS on the playing field. It still seems to be implied that this will in some way 'mitigate' for the loss of the playing field - it may or may not - what will determine the way forward (and whether the playing field is released for development) is the findings of the work relating to POS and playing field provision in the area. This should not be pre-judged. This leads on to my second point that there should be clarity in the text as to how and when this work is to be carried out - in other words what is meant by 'demonstrated.' I believe that those with an interest in the area will clearly want to know. In accordance with PPG17 the Council or a prospective developer would need to undertake a robust and up-to-date assessment involving consultation with the local community. Ideally this should be made clear in the text.

SA8

I accept that there is a need for clarity as to my concerns about soundness and your suggested explanation is in line with my thoughts.

SA17 & Housing Trajectory

No comments

Yours sincerely

Christopher Anstey

Planning Inspector

Worringham, Mark

From: Worringham, Mark
Sent: 08 February 2012 13:50
To: Programme Officer
Subject: SA5 - Downing Road Playing Field
Attachments: Main modifications SA5 06 12 12.doc

Christelle

The following attachment contains some minor proposed tweaks to the wording of SA5 (Downing Road etc). I would be grateful if you could send this to the Inspector, with the caveat that it has not yet been finally signed off by our Lead Councillor. However, we'd be grateful for any informal comments on whether that meets the concerns expressed in the Inspector's last letter (6 Feb). We are hoping to finalise our Council papers, including all proposed wording changes, on Friday.

The changes are shown in the attached in green.

Thanks

Mark

Mark Worringham *Principal Planning Officer – Local Development Framework*
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13.2 Park Lane Primary School, The Laurels and Downing Road

13.2.1 Park Lane Primary School in Tilehurst, Reading is a 2 Form Entry (2FE) Primary School. The school currently operates from a split campus across four separate sites. This arrangement is unsatisfactory from an education point of view and it is proposed to consolidate a new school, library and health centre on a single site at the Laurels, funded in part by the potential sale of surplus sites at Park Lane and Downing Road.

SA5: PARK LANE PRIMARY SCHOOL, THE LAURELS AND DOWNING ROAD

The existing Park Lane Primary School and associated playing fields, hard play areas, car parking and associated facilities will be reprovided on a single extended site at the Laurels, School Road, Tilehurst.

~~If required to support the scheme, the Downing Road Playing Fields will be released for residential development subject to it being demonstrated that the loss of the open space is justified under relevant national and local policy. Development should provide 45-55 units together with appropriate public open space, including a play area, will be developed for residential (45-55 units) and open space. Appropriate public open space provision, including a play area, should be provided as part of any development to mitigate the loss of the private playing fields and to provide an appropriate setting for the existing public footpath that forms the western boundary of the site. Resolution of highway and access issues on Downing Road will be required. Hedgerows and trees should be retained.~~

~~As a result of the re-provision of the Park Lane Primary School on a single site, the existing Park Lane School Site and its Annex off Downing Road and the Downing Road Playing Fields will be released for development as follows:~~

~~The main Park Lane School Site will be redeveloped for residential purposes (15-20 dwellings) with access off Downing Road and Chapel Hill. Development should address the practicality of retaining elements of the existing building within any new scheme.~~

~~The Park Lane School Annex will be reused/ redeveloped for community or residential purposes, subject to safeguarding the amenity of occupiers of adjacent properties.~~

~~The Downing Road Playing Fields will be developed for residential (45-55 units) and open space. Appropriate public open space provision, including a play area, should be provided as part of any development to mitigate the loss of the private playing fields and to provide an appropriate setting for the existing public footpath that forms the western boundary of the site. Resolution of highway and access issues on Downing Road will be required. Hedgerows and trees should be retained.~~

Aim of the Policy

13.2.2 The policy aims to facilitate the rationalisation of the primary school provision (as described below) and guide the future development of the surplus sites. It helps to achieve core objective 2 of the Core Strategy by creating good access to education and housing.

Reason for the Policy

- 13.2.3 As part of a major rationalisation project, it is proposed to build a replacement 2FE Primary School (to include a separate Early Years Nursery provision) on the existing Infant School Laurels site. The existing site will be enlarged by taking in additional publicly owned areas of land as part of the site assembly for this project. The scheme will provide new, bespoke designed school buildings, in conjunction with the required external playing field areas sufficient to meet the minimum requirements for a school of this size along with a new 2-court MUGA hard court provision.
- 13.2.4 The total site area of the 4 parcels of land that comprise the existing school extends to 2.6695ha (26,695 sqm). The Proposals Map shows the relative location and the extent of each of these sites.
- 13.2.5 The existing Park Lane School exists on 4 widely separated sites, which is far from ideal in terms of providing a satisfactory primary education environment. In addition, the suitability and condition of its buildings and outdoor play areas is far from ideal in relation to modern education practice. The proposal involves the development of a single site school on the site of the Laurels incorporating the existing Blagrove Nursery, Tilehurst Library and Tilehurst Health Clinic and utilising, and reconfiguring, part of the existing recreation ground for school playing fields and outdoor play. The existing Blagrove Nursery school site would be returned to public open space and incorporated into Blagrove Recreation Ground with enhanced facilities.
- 13.2.6 The Junior part of the school comprises two built sites along with a playing field located at the end of Downing Road. The main school site which fronts onto Park Lane, with entrances from Chapel Hill and Downing Road, contains an extended Victorian brick building with a grassed frontage to Park Lane and hard play areas to the rear. The site contains a number of trees. National Policy in PPS5 (published in 2010) gives further weight to the conservation of local heritage assets even where they are undesignated, and requires that applications affecting heritage assets, including local heritage assets such as Park Lane School, should be accompanied by information on the significance of the asset using appropriate expertise, and that there is a presumption in favour of conservation of the asset. Any development of the site should address the practicality of retaining and converting parts of the existing school building. The site is proposed for residential development although the provision of specialist accommodation e.g. care home, elderly units would be appropriate in this very accessible location.
- 13.2.7 The Annex site contains a single storey prefabricated building with frontage to the eastern side of Downing Road. The depth of the site is only 13 metres which is very shallow and it backs on to houses and gardens that front Park Lane/ School Road. The site and existing building is provisionally reserved for a police office and a facility for the Tilehurst Horticultural Society. Residential would be an appropriate alternative use of the land, subject to regard being paid to the amenity of occupiers of adjacent properties.
- 13.2.8 The Downing Road Playing Field is a fenced area of private, recreational space. The release of open space will need to be clearly justified in terms of both national and local planning policy. Policy CS28 of the Core Strategy states that development of open spaces would only be permitted if replacement open space, to a similar standard, can be provided at an accessible location close by, or that improvements to recreational facilities on remaining space outweighs the loss. In relation to current national guidance (PPG17), the Downing Road Playing Field would only be released for residential development if it has been demonstrated *through a robust and up-to-date assessment, carried out by the Council or an applicant and involving consultation with the local community*, that the open space is surplus to the requirements of the local area, and that there is an excess of playing field provision in the catchment or replacement playing field

provision could be made. The disposal of the Downing Road Playing Field has been approved by the Secretary of State for Education (under Section 77 of the School Standards and Framework Act 1998).

13.2.9 If loss of the playing field is adequately justified, some public open space provision, including a play area, should be provided as part of any development ~~to mitigate the loss of the private playing fields and~~ to provide an appropriate setting for the public footpath adjoining the western boundary of the site.

13.2.10 Developers should examine the possibility of serving some of the development via a separate access from Beverley Road. If the loss of the playing field is justified, the site is proposed for residential development although the provision of specialist accommodation, e.g. care home, elderly units, would be appropriate in this very accessible location.

~~13.2.8 The Downing Road Playing Field is a fenced area of private, recreational space. It is proposed for residential development and open space. Its disposal is essential to realise the significant community benefits of providing a new primary school on a single site to serve the Tilehurst area. The disposal of the Downing Road Playing Field has been approved by the Secretary of State for Education (under Section 77 of the School Standards and Framework Act 1998). Some public open space provision, including a play area, should be provided as part of any development to mitigate the loss of the private playing fields and to provide an appropriate setting for the public footpath adjoining the western boundary of the site. Any application involving the loss of the primary school playing field may attract objections from Sport England unless it is demonstrated that there is an excess of playing field provision in the catchment or replacement playing field provision is provided. In addition, an area of open space is to be retained as part of any development. There may be scope to provide replacement provision at the Blagrave Recreation Ground area and the enhancement of playing pitch provision in that location. Developers should examine the possibility of serving some of the development via a separate access from Beverley Road. The site is proposed for residential development although the provision of specialist accommodation, e.g. care home, elderly units, would be appropriate in this very accessible location.~~

How will the Policy be achieved?

13.2.911—The sites in this policy are in Council ownership, and this policy will therefore be implemented primarily by the Council. The policy will also be achieved through the development management process, including on the surplus sites.

How will the Policy be monitored?

See overall monitoring of development for different uses (section 16)

Other Suggested Modifications as a Result of Changes to SA5

In Figure 14 (Appendix 1) for SA5 make the following changes:

SA5	Downing Road, Park Lane School and the Laurels	<u>Residential development dependent on justification of loss of playing field. If loss justified, allocation is for 60-75 dwellings, but this figure is excluded from the total below. 60-75</u>
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Revise the total provision to exclude the 60-75 dwellings.

In Figures 15, 16a and 16b (Appendix 1) exclude the 68 dwellings assumed for site SA5 from the projected provision.

**Reading Borough Local Development Framework
Sites and Detailed Policies Document - Public Examination**

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Mark Worringham
Via E-mail

8th February 2012

Dear Mark,

I have requested the Inspector's views on your suggested modifications to Policy SA5 and he has now confirmed that they address his concerns.

Yours sincerely

Christelle Beaupoux
Programme Officer