

PLANNING STATEMENT

**GYPSY AND TRAVELLER
TRANSIT SITE**

**LAND SOUTH OF ISLAND ROAD,
READING**

**ON BEHALF OF
READING BOROUGH COUNCIL**

NOVEMBER 2021

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been produced by Shrimplin Planning & Development on behalf of Reading Borough Council in support of a full planning application for a Gypsy and Traveller transit site at land south of Island Road, Reading (hereafter referred to as the “Application Proposal” and the “Application Site”). It will result in 7 pitches.
- 1.2 The Application Proposal is the culmination of extensive research and consultation, which is summarised in Chapter 4. It has also been subject to extensive pre-app consultation with relevant statutory consultees. It meets an urgent and longstanding need for a transit site.
- 1.3 The next chapter of this Planning Statement explains the Application Proposal and the information that forms the application submission. Chapter 3 describes the Application Site and its wider context. Chapter 4 summarises the process that the Council have been through to establish the need for a Gypsy and Traveller transit site and the extensive site search process. Chapter 5 sets out the relevant policy framework and the decision-making process. Chapter 6 provides an assessment of the Application Proposal against the development plan. A summary and conclusion are provided in Chapter 7.

2.0 APPLICATION PROPOSAL AND THE APPLICATION SUBMISSION

- 2.1 This chapter explains the Application Proposal and the information that forms the application submission.

The Application Proposal

- 2.2 The Application Proposal is for a gypsy and traveller transit site. The Department for Communities and Local Government 'Planning policy for traveller sites' (August 2015) defines "gypsies and travellers" as:

"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such." (Annex 1: Glossary).

- 2.3 Reading Borough Council's 'Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment' (June 2017)) defines a transit site as:

"A site intended for short-term use while in transit. The site is usually permanent and authorised, but there is a limit on the length of time residents can stay." (glossary).

- 2.4 The transit site will comprise 7 pitches, bin store, outdoor seating area, play area, and a new access onto Island Road. Each plot comprises a kitchen/toilet block and space for two caravans and two cars.

The application submission

- 2.5 The application submission includes a full range of supporting information which demonstrate that the Application Proposal is acceptable. This includes:

- Air Quality Assessment (RAMBOLL) (26 Oct 2021)
- Arboricultural Statement (S J Stephens Associates) (31 November 2021)
- Design and Access Statement (Hampshire County Council) (November 2021)
- Discipline Input Plan Lighting (RAMBOLL) (3 November 2021)
- Drawings (Hampshire County Council) (November 2021)
- Ecological Appraisal (HCCET) (4 October 2021)
- Ground Investigation Report (Terrafirma (south)) (August 2021)
- Flood Risk Assessment (RAMBOLL) (November 2021)
- Surface Water Drainage Strategy (RAMBOLL) (November 2021)
- Noise Impact Assessment (RAMBOLL) (November 2021)
- Planning Statement (Shrimplin Planning & Development) (November 2021)
- Transport Statement (RAMBOLL) (November 2021)

2.6 Discussions with Dr Edward Peveler of Berkshire Archaeology, have identified there is a potential for underlying intact archaeological deposits below a deep layer of existing made ground. However based on borehole survey information which defines the depth of the made ground, along with preliminary structural proposals which show a worst case excavation depth, Dr Peveler has confirmed no archaeological works will be required.

3.0 APPLICATION SITE AND ITS WIDER CONTEXT

3.1 This chapter describes the Application Site and its wider context.

Application Site

3.2 The Application Site is unallocated “white” land within the urban area of Reading. It is overgrown scrubland. It is enclosed by mature, dense tree belts which will be retained.

3.3 There is no relevant planning history of the Application Site.

Wider context

3.4 The wider area has a varied character and contains a number of different uses. To the north is Island Road which leads to the A33. On the other side of Island Road are large warehouse units. To the east is car parking serving the Reading Sewage Treatment Works. Further east is vacant land (allocated under Policy SR1c for commercial uses) and, on the other side of the A33, the new residential area on Kennet Island. To the south the scrubland narrows and continues. Further south is an area of business parks and new residential development. To the west is a watercourse which is identified in the Local Plan under Policy EN12: Area of identified biodiversity interest. Beyond this is the Reading Waste Management Park located within a large warehouse building. Further west are agricultural fields (allocated under Policy SR1c for commercial uses).

3.5 The Atomic Weapons Establishment (AWE) site at Burghfield is located in West Berkshire District, just over 1.5 km from the Reading Borough boundary. The activities within the AWE include final assembly, maintenance and decommissioning of warheads. The implications of this are addressed in Chapter 6.

4.0 NEED FOR A GYPSY AND TRAVELLER TRANSIT SITE AND SITE SEARCH

4.1 This chapter summarises the process that the Council have been through to establish the need for a Gypsy and Traveller transit site and the extensive site search process that culminated in the selection of the Application Site.

4.2 Periodically assessing the housing needs of people living in caravans or houseboats is a requirement for local housing authorities under the Housing and Planning Act 2016 (124). Examining the accommodation needs of gypsies and travellers is an expectation of national planning policy (Planning Policy for Traveller Sites, 2015) and an important part a Local Plan.

4.3 Reading Borough Council therefore commissioned arc to produce a ‘Gypsy and Traveller Accommodation Assessment’ (GTAA) (June 2017). The purpose of the GTAA was:

“...to identify the accommodation needs of Gypsies and Travellers, Travelling Showpeople and houseboat dwellers from across Reading.” (paragraph 1.1).

“The overall purpose of a Gypsy and Traveller Accommodation Assessment (GTAA) is to support the development of clear and realistic planning policies relating to Gypsies and Travellers, Travelling Showpeople and houseboat dwellers. The study provides an evidence base to assist the Council in determining an appropriate level of pitch provision to be sought through the lifetime of the Local Plan and to identify the accommodation needs of Gypsies and Travellers to meet the Council’s obligations under section 8 of the Housing Act 1985 (as added by section 124 of the Housing and Planning Act 2016).” (paragraph 1.7).

4.4 The GTAA started with “a review of the legislative and policy context” (Chapter 2); followed by “the study’s research methodology” (Chapter 3); “estimates of the travelling population across Reading Borough and the scale of existing site/plot/mooring provision” (Chapter 4); “[summary of] views of stakeholders

expressed through the on-line survey” (Chapter 5); “detailed assessment of drivers of demand, supply and current shortfalls across the study area” (Chapter 6); and conclusions “identifying headline issues, and recommending ways in which these could be addressed” (Chapter 7).

- 4.5 The GTAA identified accommodation needs including for 10-17 permanent pitches for gypsies and travellers, 2 additional plots for traveling showpeople, and for 5 transit pitches:

“Analysis of unauthorised encampment data would suggest that a transit site of 5 pitches (accommodating up to 10 caravans) would be sufficient to accommodate 91.9% of unauthorised encampments over the period April 2014 to March 2017.” (paragraph 7.11).

- 4.6 The GTAA was reported to the Policy Committee on 25 September 2017. The Officer Report explained the lack of existing provision within Reading:

“There are no current permanent or transit pitches for gypsies and travellers within Reading Borough. There is one authorised travelling showpeople site at Scours Lane in Reading, with six plots.” (paragraph 4.3)

- 4.7 The Officer Report explained the significant issues that this created:

“At the same time, there are current issues with unauthorised encampments within Reading. There were 87 unauthorised encampments within Reading between April 2016 and March 2017, the majority of which were on Council land. This has significant financial costs in terms of legal, bailiff and clean-up costs as well as officer time (see section 9 for further information). Powers under the Criminal Justice and Public Order Act 1994 to seize vehicles of those who have failed to comply with a direction to leave land rely upon a suitable pitch being available on a caravan site within a local authority area, which means that the ability to use these powers in Reading is currently restricted by the lack of sites.” (paragraph 4.4)

- 4.8 The Officer Report explained the efforts that the Local Plan had gone through to try to identify sites:

“A significant amount of background work has been undertaken on trying to identify whether there are sites that could be identified to help to meet the needs for gypsies and travellers. In terms of land outside Council ownership, consultations on the Local Plan Issues and Options (January 2016) and again on the Draft Local Plan (May 2017) have specifically asked for sites to be put forward for gypsies and travellers. None were forthcoming. As a further measure, in August 2017 the Council wrote to all landowners of sites that had been identified as potential development sites in the Draft Local Plan to specifically request that landowners consider whether provision for gypsies and travellers could be made within their site. No landowners identified any potential. It is therefore considered that there is no realistic likelihood of a private site or sites being provided within Reading.” (paragraph 4.5)

- 4.9 A list of c80 Council owned sites was therefore drawn up:

“Therefore, a process was undertaken to thoroughly examine the potential for Council-owned land to be used to help to meet the identified needs... Therefore, a list of around 80 Council-owned sites was drawn up that included all sites that do not house permanent in-use buildings and which are not covered by a proposed planning open space designation or house statutory allotments.” (paragraph 4.6).

- 4.10 Each site was thoroughly assessed, after which only one was identified as having potential:

“Each of the 80 potential sites was considered in detail in terms of their suitability in planning terms (including matters such as flood risk, biodiversity, important trees, access, residential amenity and visual effects) and their likely availability for the use during the period of the plan (considering matters such

as current leases, covenants and any existing plans for use of land)... After full consideration of all sites, only one site was identified, which had potential to meet the identified transit need. This site was land at Cow Lane and Richfield Avenue.” (paragraph 4.7).

- 4.11 A Gypsy and Traveller Provision Background Document (September 2017) set out the process and results of the consideration of each of the 80 sites. This accompanied a Gypsy and Traveller Provision Consultation Document (September 2017) which sought views on the selected site at “Land at Junction of Cow Lane and Richfield Avenue”.
- 4.12 The site was also included in the Pre-Submission Draft Local Plan (November 2017) which identified the Cow Lane site as a potential location for traveller transit use under Policy WR4.
- 4.13 The results of the public consultation were reported to the Policy Committee on 11 June 2018. The Officer Report explained that:

“A total of 222 responses were received to the consultation. The large majority of these (164) constituted objections to the proposed site at Cow Lane. A smaller number of representations in support were received (31), whilst the remainder asked for additional information or raised other issues. As well as members of the public, there was a large response from businesses operating from the Richfield Avenue and Portman Road areas, and particularly strong concerns were raised by Festival Republic with regard to the Reading Festival, and from the Council’s own Leisure and Recreation section.” (paragraph 4.5).

- 4.14 The Officer Report considered all of the issues raised and concluded:

“In summary, many of the issues raised during consultation would have been potentially capable of resolution as part of a proposal on the Cow Lane site. However, the effects on Reading Festival would be severe, and would potentially constrain the operation of the Festival to such an extent that it could not continue in its current location. The Festival makes a very significant

contribution to both the economy and the cultural life of Reading, and detrimental effects on its operation would not be acceptable.” (paragraph 4.13).

- 4.15 The Officer Report also explained that the Cow Lane site was, by that stage, part of a potential site for a new secondary school:

“Since both the Gypsy and Traveller Consultation Document and the Pre-Submission Draft Local Plan have been subject to consultation, a process undertaken by the Council to identify a site for a new 6 form entry secondary school has resulted in a recommendation to confirm a site at Richfield Avenue as the preferred option. The Cow Lane site that was subject to consultation for transit use forms a part of this site, which also includes the adjacent former Leaderboard driving range.”

- 4.16 The Officer Report explained that during this consultation process a number of other sites were suggested for consideration. Of these five sites had not already been considered as part of the site selection process. The Officer Report considered these sites but concluded that none were suitable (paragraph 4.12).

- 4.17 As a result the Cow Lane site was not progressed further:

“Due to the significant adverse effects on Reading Festival, as well as the proposals for use of a site including this land for a secondary school, it is recommended that the proposal for a traveller transit site at Cow Lane not be proceeded with.” (paragraph 4.16).

- 4.18 As a result the Council reappraised potential sites. This process identified a shortlist which were reviewed in more detail. This process resulted in identifying the Application Site as the preferred option.

- 4.19 As explained above, the Local Plan 2013-2036 process fed into the search for sites for gypsies, travellers and travelling showpeople and when it was adopted (November

2019) it repeated the need for this type of accommodation. It explained the national planning policy requirement to meet this need and reflected the conclusions of the GTAA (paragraph 4.4.103-4.4.104) and made clear that:

“The Council is exploring with its neighbours whether there are options for meeting the permanent need outside the Borough, and continues to look for opportunities to make transit provision within Reading.” (paragraph 4.4.104)

4.20 The Local Plan also explained that “In addition to an identified site, there is also a need to include a general policy to judge any applications for sites for gypsies, travellers and travelling showpeople.” (paragraph 4.4.105). It therefore included Policy H13: Provision for Gypsies and Travellers. The Application Proposal is assessed against this policy in Chapter 6.

5.0 POLICY FRAMEWORK AND DECISION MAKING PROCESS

5.1 The chapter sets out the development plan and the decision making process.

Development plan

5.2 The relevant parts of the development plan comprise the Reading Local Plan 2013-2036 (November 2019).

5.3 Relevant supplementary planning documents are material planning considerations, including the Sustainable Design and Construction SPD (December 2019), although it pre-dates the NPPF and adopted Local Plan which limits the weight that can be given to it. The NPPF (July 2021), with additional guidance in the NPPG, is also an important material planning consideration.

Decision-making process

5.4 Planning law requires that applications for planning permission must be “determined in accordance with the Development Plan unless material considerations indicate otherwise” (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

5.5 The NPPF explains that “Plans and decisions should apply a presumption in favour of sustainable development” (paragraph 11). For “decision taking” this means:

- “approving development proposals that accord with the development plan without delay; or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.

5.6 In this case the policies which are most important for determining the application are up to date. As a result, the Application Proposal needs to be assessed on the basis of whether it is in accordance with the development plan.

5.7 The recently adopted Local Plan reflects the above approach in Policy CC1: presumption in favour of sustainable development.

5.8 In considering applications it is important to bear in mind the advice in the NPPF’s chapter on “decision making”, reflected in Policy CC1, which begins by encouraging local planning authorities to approve applications:

“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available... and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.” (paragraph 38).

5.9 The next chapter assesses the Application Proposal within this policy framework and decision making process.

6.0 ASSESSMENT OF THE APPLICATION PROPOSAL

6.1 This chapter assesses the Application Proposal against the development plan in terms of the principle of development; makes efficient use of scarce urban land; design and amenity.

Principle of development

6.2 As explained in Chapter 4, the Local Plan 2013-2036 process fed into the search for sites for gypsies, travellers and travelling showpeople and when it was adopted (November 2019) it repeated the need for this type of accommodation. It included Policy H13: Provision for Gypsies and Travellers, which is as follows:

“Proposals for new sites or extensions to existing sites for gypsies, travellers and travelling showpeople will be judged against the following criteria.

Proposals should

- i) Have safe and convenient access onto the highway network;
- ii) Have good access to a range of facilities including education and healthcare by a choice of means of travel, including walking;
- iii) Not have an unacceptable impact on the physical and visual character and quality of the area;
- iv) Not result in an adverse impact on the significance of a heritage asset;
- v) Be located in line with national and local policy on flood risk, and not involve location of caravans in Flood Zone 3;
- vi) Not have an unacceptable impact on the amenity of existing residents in surrounding areas, or on future residents of the proposal; and
- vii) Not result in the loss of biodiversity or important trees, and provide a net biodiversity gain where possible.”

- 6.3 The Application Proposal meets criterion (i) as a new access will be created onto Island Road from the Application Site and this has been tested to ensure that it is safe and convenient.
- 6.4 There are convenience shops (Londis, Hudsons) and a café (Fidget & Bob) at The Piazza on Whale Avenue/Lindisfarm Way c520m to the east of the Application Site. Further away, 1.4km from the Application Site, are a range of shops including a pharmacy (Whitley Pharmacy), newsagent, barber, hairdresser, launderette, supermarkets (Aldi, Morrisons) as well as a range of shops and cafés/takeaways. The Longbarn Lane Surgery is 1.9km to the east. The Reading Gate Retail Park is 1.3km to the south. The Whitley Park Primary School and Nursery School is 1.1km to the east whilst the new is 1.1km to the south along the footpath that runs alongside the Application Site. There are bus stops on the A33 and Lindisfarne Way, 200m to the east of the Application Site, linking to the various facilities in Basingstoke Road as well as central Reading to the north. There is easy access to the A33 and from there to the M4.
- 6.5 The supporting text says that “...good access by foot to education and healthcare (ideally within 400m, but 800m at the furthest) is particularly vital, as is the need for good access to the highway network.” This is not part of the requirement of Policy H13. The Application Site is beyond these distances but has good access to a large number of facilities, including two primary schools, and has good access to the highways network. The Application Proposal therefore meets criterion (ii).
- 6.6 As explained in Chapter 2, the Application Site is enclosed by mature, dense tree belts which will be retained, thus limiting views of the site. The wider area has a varied character and contains a number of different uses. It does not have a strong or important physical and visual character. The Application Proposal therefore meets criterion (iii).
- 6.7 There are no heritage assets close to the Application Site or in the wider area. The Application Proposal therefore meets criterion (iv).

- 6.8 The Application Site is partly, but not wholly, within Flood Zone 3. The application is accompanied by a Flood Risk Assessment which explains how the Application Proposal is in accordance with national and local policy on flood risk. The Application Proposal therefore meets criterion (v).
- 6.9 There are no residential properties close the Application Site and there are no planned residential developments. The Application Proposal therefore meets criterion (vi).
- 6.10 The application is accompanied by a Preliminary Ecological Assessment that explains that the scheme will not result in a loss of biodiversity or important trees and will provide ecological mitigation. The Application Proposal therefore meets criterion (vii).
- 6.11 The Application Proposal meets all the criteria and is therefore in accordance with Policy H13.

Makes effective use of scarce urban land

- 6.12 The NPPF (February 2021) has a specific chapter dealing with “Making effective use of land”. This begins by making clear that:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions” (paragraph 119).

- 6.13 It specifically highlights the need to make best use of underutilised land and buildings:

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs,...

“d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively...” (paragraph 120).

- 6.14 The NPPF also encourages local planning authorities to proactively identify sites, which is exactly what Reading Borough Council have done:

“Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them.” (paragraph 121).

- 6.15 The Local Plan picks up this key issue in its “Objectives”. Although this is in the context of housing development, this can include accommodation for gypsies and travellers given that they are addressed in the Council’s housing chapter:

“2. Make the most efficient use of Reading’s limited land, particularly previously developed land, to ensure that as many new homes as possible are delivered to meet identified needs, particularly needs for affordable housing;”

- 6.16 It is also reflected in the “Spatial Strategy for Reading” which highlights the constrained nature of Reading and the need to ensure the efficient use of land:

“The constrained nature of Reading Borough dictates the spatial strategy to some extent. Significant development can only occur where sites are available, which inevitably means a considerable focus on the centre and south of Reading. Opportunities for large-scale expansion of the town onto greenfield sites within the Borough are virtually non-existent, with the small rural areas within the boundaries subject to significant flood risk. This means a need to look within the existing urban area for opportunities, and to ensure efficient use of land.” (paragraph 3.2.1).

- 6.17 Both the NPPF and the Local Plan emphasise the need to make efficient use of scarce brownfield land. The Local Plan highlights the constrained nature of Reading and the need to ensure the efficient use of land. The Application Site makes effective use of

scarce urban land in accordance with the Local Plan’s “Objectives” and “Spatial Strategy for Reading”.

Design and amenity

6.18 NPPF Chapter 12 on “Achieving well-designed places” begins by stating that:

“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.” (paragraph 124).

6.19 Local Plan Policy CC7: Design and the Public Realm sets out a wide range of considerations that need to be borne in mind when designing schemes:

“All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form, including:

- Layout: urban structure and urban grain;
- Landscape;
- Density and mix;
- Scale: height and massing; and
- Architectural detail and materials

will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives: -

- Character - a place with its own identity and sense of place
- Continuity and enclosure
- Quality of the public realm and provision of green infrastructure and landscaping

- Ease of movement and permeability
- Legibility - clear image and easy to understand
- Adaptability – capable of adaptation over time
- Diversity – meets a wide range of needs.

Developments will also be assessed to ensure that they: -

- Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;
- Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;
- Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;
- Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.

Applications for major developments, or other relevant developments, should be accompanied by a design and access statement that deals with all the above matters.

6.20 Policy CC8: Safeguarding Amenity sets out a number of important considerations about the living environment of existing and proposed residential properties:

“Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of:

- Privacy and overlooking;
- Access to sunlight and daylight;
- Visual dominance and overbearing effects of a development;
- Harm to outlook;
- Noise and disturbance;
- Artificial lighting;
- Vibration;
- Dust and fumes;
- Smell;
- Crime and safety; or
- Wind, where the proposals involve new development of more than 8 storeys.”

6.21 The supporting text explains that:

“One of the key concerns of planning is to ensure that new development does not reduce the quality of the environment for others, particularly where it would affect residential properties. At the same time, ensuring that new development creates a quality living environment for future residents is also critical.” (paragraph 4.1.36)

“Most tensions can be avoided by careful design, siting and orientation of buildings and spaces, paying particular attention to those aspects which are most likely to cause issues (e.g. car parks, bin stores and noisy equipment), and which are most sensitive to effects (e.g. children’s play areas, outdoor spaces or habitable rooms). Planning conditions can also be used to deal with matters such as the installation of extraction systems, hours of operation, or preventing a development from changing its character.” (paragraph 4.1.38).

6.22 All of these considerations set out in Policies CC7 and CC8 have been borne in mind in designing the scheme. Further detail can be found in the Design and Access Statement and the supporting information.

Burghfield Atomic Weapons Establishment (AWE)

- 6.23 As explained in Chapter 2, the Atomic Weapons Establishment (AWE) site at Burghfield is located in West Berkshire District, just over 1.5 km from the Reading Borough boundary. On 22 May 2019, the government introduced the new Radiation (Emergency Preparedness and Public Information) Regulations 2019 to strengthen the national emergency preparedness and response arrangements for radiological emergencies. These replaced the REPIR 2001 regulations. West Berkshire Council have a number of responsibilities in order to ensure compliance with the REPIR 2019 regulations. These include determining the Detailed Emergency Planning Zone (DEPZ) for each of the AWE sites. The AWE Detailed Emergency Planning Zone Report (12 March 2020) produced by West Berkshire explains how this has been drawn.
- 6.24 The Report explains that an Urgent Protective Actions (UPA) area should be drawn around Burghfield. The minimum geographical extent of the UPA around Burghfield is a radius of 3160m (paragraph 5.5.1). The Application Site falls outside this. However, the Report explains that the UPA can be extended so that it fits geographical features:
- “In defining the boundary of a detailed emergency planning zone, geographic features should be used for ease of implementing the local authority’s off-site emergency plan. Physical features such as roads, rivers, railways or footpaths should be considered as well as political or postcode boundaries, particularly where these features and concepts correspond with other local authority emergency planning arrangements.” (paragraph 5.6.2).
- 6.25 The UPA was extended northwards to Island Road and eastwards to the A33. As a result the Application Site falls within this extended area.
- 6.26 Within this extended area “The recommended Urgent Protective Action (UPA) is shelter” (paragraph 5.5.3) and the “Timescales for undertaking the UPA (Shelter) is as soon as possible and no later than 25 minutes from the start of the incident”

(paragraph 5.5.4). It continues, “Those properties within the DEPZ are therefore afforded a warning system to alert them to take shelter as soon as possible and minimise the risk to their health.” (paragraph 5.6.1). There is no exclusion of development within the UPA area.

6.27 The Application Proposal is outside the minimum geographical extent of the Urgent Protective Actions (UPA) area but within the extended area defined by the AWE within the Detailed Emergency Planning Zone Report produced by West Berkshire (12 March 2020). Within this area there is no exclusion of development but the advice is to shelter and properties are given a warning system. The Application Proposal will meet these requirements.

6.28 Local Plan Policy OU2: Hazardous Installations explains that:

“Proposals for hazardous substances consent, or development in the vicinity of hazardous sites or pipelines, will not be permitted unless it has been satisfactorily demonstrated that the amount, type and location of hazardous substances would not pose adverse health and safety risks to the surrounding population and environment; and that any necessary special precautions to limit other potential societal risks to acceptable degrees would be put in place prior to the development commencing.”

6.29 The Local Plan, which predates the AWE Detailed Emergency Planning Zone Report (12 March 2020), explains that “there is a requirement for consultation with the Office for Nuclear Regulation (ONR)...” for different types of development in different consultation zones surrounding Burghfield (paragraph 4.7.15). Local Plan Figure 4.9 shows different zones, with the Application Site falling within the “Outer Zone” where consultation is required for “Development likely to lead to an increase of 500 people in the population at any place.” The Local Plan explains that “The Council will continue to work with neighbouring authorities (Basingstoke and Deane Borough Council, West Berkshire District Council, Wokingham Borough Council) and the ONR to monitor development proposals and activity, to assess whether or not proposed development

can be safely accommodated in areas around the installation.” (paragraph 4.7.16).
There is no exclusion of development within any of these consultation zones.

- 6.30 The Application Proposal is within the Outer Zone defined by the Local Plan. Within this area there is no exclusion of development but consultation is needed with the ONR for development that is likely to lead to an increase of 500 people in the population at any place, which does not apply to the Application Proposal. The Application Site is within an area with very little residential development and there are no plans for residential development in the surrounding area. The Application Proposal is for a transit site and so does not represent permanent accommodation.
- 6.31 The Application Proposal therefore meets the requirements of the The AWE Detailed Emergency Planning Zone Report (12 March 2020) produced by West Berkshire and of Local Plan Policy OU2.

7.0 SUMMARY AND CONCLUSION

- 7.1 This Planning Statement has been produced by Shrimplin Planning & Development on behalf of Reading Borough Council in support of a full planning application for a Gypsy and Traveller transit site at land south of Island Road, Reading (hereafter referred to as the “Application Proposal” and the “Application Site”). It will result in 7 pitches.
- 7.2 Chapter 2 explained the Application Proposal and the information that forms the application submission. Chapter 3 described the Application Site and its wider context.
- 7.3 Chapter 4 summarised the process that the Council have been through to establish the need for a Gypsy and Traveller transit site and the extensive site search process. This process has taken over 4 years and has involved extensive public consultation.
- 7.4 Chapter 5 set out the relevant policy framework and the decision-making process, concluding that the Application Proposal needs to be considered in terms of its conformity with the development plan. Chapter 6 provided an assessment of Application Proposal against the development plan.
- 7.5 The principle of development meets all the criteria and in accordance with Policy H13: Provision for Gypsies and Travellers.
- 7.6 Both the NPPF and the Local Plan emphasise the need to make efficient use of scarce brownfield land. The Local Plan highlights the constrained nature of Reading and the need to ensure the efficient use of land. The Application Site makes effective use of scarce urban land in accordance with the Local Plan’s “Objectives” and “Spatial Strategy for Reading”.
- 7.7 All of these considerations set out in Policies CC7: Design and the Public Realm and Policy CC8: Safeguarding Amenity have been borne in mind in designing the scheme. Further detail can be found in the application supporting documents. The Application Proposal is therefore in accordance with these policies.

- 7.8 Neither the AWE Detailed Emergency Planning Zone Report (12 March 2020) produced by West Berkshire nor Local Plan Policy OU2 exclude development around Burghfield AWE. The Application Proposal meets the requirements of both documents.
- 7.9 We respectfully request that planning permission is granted.

**Gypsy & Traveller Transit Site
Planning Application**

Design & Access Statement
November 2021

E03883

Reading Borough Council: Gypsy & Traveller Transit Site
Design & Access Statement November 2021

A Report by:

Hampshire County Council - Property Services
Three Minsters House
76 High Street
Winchester
Hampshire SO23 8UL

In association with the

Ramboll Group A/S
and
Shrimplin Planning & Development

for
Reading Borough Council

Revision	Description	Date	Revised By	Checked By
0.1	Planning Submission	November 2021	NJC	AP

<p>1.00 INTRODUCTION</p> <ul style="list-style-type: none"> • Background • Project Context <p>2.00 ASSESSMENT OF SITE CONTEXT</p> <ul style="list-style-type: none"> • Location and Surroundings <p>3.00 SUPPORTING STATEMENTS</p> <ul style="list-style-type: none"> • Generally • Air Quality • Archaeological • Contaminated Land Survey • Ecological Assessment • External lighting Details • Heads of terms • Landscape Principles • Materials Details • Noise & Vibration Impact Assessment • Planning Statement • Transport Statement • Tree Survey / Arboricultural Assessment • Utilities Surveys and Proposals • Other Statements 	<p>4.00 OPTIONS APPRAISAL & BRIEF</p> <ul style="list-style-type: none"> • Pre-Application Planning Advice • Reviews • Options Appraisal • Brief <p>5.00 DESIGN</p> <ul style="list-style-type: none"> • Approach to Design • Site Layout • Site Facilities • Form, Massing and Scale • External Appearance & Materials • Sustainability & Environmental Control • Soft Landscape • Hard External Works <p>6.00 ACCESS PROPOSALS</p> <ul style="list-style-type: none"> • Approach to Inclusive Design • Vehicle and Transport Links • Facilities within the Building • Security • Main Entrance and Reception • Sketch Views 	<p>PLANNING DRAWINGS</p> <ul style="list-style-type: none"> • E03883-HCC-00-XX-DR-A-1000 Location Plan • E03883-HCC-00-XX-DR-A-1500 Proposed Block Site Plan • E03883-HCC-00-XX-DR-A-1510 Proposed Detailed Site Plan • E03883-HCC-00-XX-DR-A-2000 Proposed Building Floor Plans & Elevations • E03883-HCC-00-XX-DR-A-3100 Proposed Site Sections
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1.00 Introduction



Location Plan

Background

1.01 This Design & Access Statement is provided in support of the application for planning permission for a new Gypsy & Traveller Transit Site at land south of Island Road, Reading.

1.02 The report should be read in conjunction with other documents supporting this planning application as set out in Section 3.00.

Project Context

1.03 Reading Borough Council has identified through its Gypsy and Traveller Accommodation Assessment a requirement to ensure adequate transit Gypsy and Traveller pitch provision within the Borough, for which there are currently no pitches.

1.04 Following an exhaustive review of all available sites in Reading, land has been identified south of Island Road in Reading for the Transit Site

1.05 Transit site provision, by nature has to be of simple and resilient design, allowing for adequate facilities of a robust nature reflecting a high turnover and heavy use of site infrastructure.

2.00 Site Context

Location and Surroundings

2.01 The Application Site is overgrown non developed scrub-land.

2.02 The immediate surroundings comprise mature, dense tree belts to the east and west which will be retained.

- To the north is Island Road which leads to the A33;
- To the east is car parking serving the Reading Sewage Treatment Works;
- To the south the scrub-land narrows and continues;
- To the west is a watercourse beyond which the Reading Waste Management Park located within a large warehouse building.

2.03 There are no utilities or other features on the site.

2.04 There is currently no pedestrian or vehicular access.



- 01 *Aerial plan*
- 02 *Aerial oblique view from north*
- 03 *Island Road - future site access road location*
- 04 *Island Road - future site access road location*
- 05 *Island Road - future site access road location*
- 06 *Aerial oblique view from south*
- 07 *Aerial oblique view from east*
- 08 *Aerial oblique view from west*

3.00 Supporting Statements

Generally

3.01 The following supporting information has been produced having regard to National and RBC Local Planning Authority Local Information requirements published on the authorities planning website. These documents should be read with this report and the associated drawings included.

Air Quality Assessment

3.02 Refer
RAMBOLL report dated 26 Oct 2021, titled:
Gypsy and Traveller Site, Reading.
Air Quality Assessment
ref RUK2021N00646-RAM-RP-00001

Archaeology Assessment

3.03 Discussions with Dr Edward Peveler of Berkshire Archaeology, have identified there is a potential for underlying intact archaeological deposits below a deep layer of existing made ground. However based on borehole survey information which defines the depth of the made ground, along with preliminary structural proposals which show a worst case excavation depth, Dr Peveler has confirmed no archaeological works will be required.

Contaminated Land Survey

3.04 Refer
Terrafirma (south) report dated Aug 2021, titled:
GROUND INVESTIGATION REPORT
Proposed Residential Development
Land off Island Road, Reading
ref 6683 - Smallmead Reading GIR (FINAL)
Rev02

Ecological Assessment

3.05 Refer
HCCET report dated 04 Oct 2021 titled:
Ecological Appraisal - Land at Smallmead, Island Rd, Reading FINAL
ref 20.0280

External Lighting Details

3.06 Refer
RAMBOLL report dated 03 Nov 2021, titled:
Reading Gypsy and Traveller Transit Site,
Land South Island Road, Reading,
Discipline Input Plan Lighting
ref 1620009874-RAM-ZZ-ZZ-RP-EX-00001

Flood Risk Assessment

3.07.1 Refer
RAMBOLL report dated Nov 2021, titled:
Land South Island Road, Reading,
Flood Risk Assessment
ref 1620009874-ZZ-XX-RP-WA-00001

Drainage Strategy

3.07.2 Refer
RAMBOLL report dated Nov 2021, titled:
Land South Island Road, Reading,
Surface Water Drainage Strategy
ref 1620009874-RAM-ZZ-XX-RP-WA-00002

Heads of Terms

3.08 To be ascertained by RBC Planning / RBC during planning application process

Landscape Principles

3.09 Refer
Section 5.00 of this DAS

Materials Details

3.10 Refer
Section 5.00 of this DAS

Noise & Vibration Impact Assessment

3.11 Refer
RAMBOLL report dated Nov 2021, titled:
Land South of Island Road, Reading.
Noise Impact Assessment
ref RUK2021N00646-RAM-RP-00006

Planning Statement

3.12 Refer
Planning Statement prepared by Robert Shrimplin, Planning & Development,
ref RP20211116 Planning Statement

Transport Statement

3.13 Refer
Island Road, Gypsy and Traveller Transit Site,
Transport Statement
ref RUK2021N00646-RAM-RP-00004

Tree Survey / Arboricultural Assessment

3.14 Refer
SJStephens Associates report dated 31 November 2021, titled:
Arboricultural Statement
ref *Island Road Transit Site Arb Impact Assessment 30-11-2021*

Utilities Surveys and Proposals

3.15 The site is undeveloped with no existing site Infrastructure or services utilities present. New services will be brought onto the site available from Island Road.

Vehicle Parking & Waste Collection Details

3.16 Refer
Section 5.00 of this DAS

Other Statements

3.17 It has been considered that the following reports are not applicable given the nature and type of development proposed:

- Affordable Housing Statement
- Daylight / Sunlight Assessment
- Energy & Sustainability Statement
- Environmental Impact Assessment
- Heritage Statement
- Vent / Extract Details
- Viability Assessment & report

4.00 Options Appraisal & Brief

Options Appraisal

4.01 Reading Borough Council completed a Gypsy and Traveller Accommodation Assessment (GTAA) in 2019 and subsequently carried out an exhaustive review through 2019 and 2020 to identify all sites in Reading, suitable for a Transit park Facility.

Working with Hampshire County Council, Reading Borough Council identified a limited number of sites for further study. Preliminary options were developed, appraised and evaluated, and the Island Road site was finally identified as the most feasible option for the Authority to take forward.

4.02 In parallel, RBC and HCC carried out a review of existing transit parks, reviewing site layouts, operational issues etc and along with other specialists, developed a preferred brief for the new site.

The existing Transit Park facility at Westhampnett in West Sussex provided a useful reference project and has proven most successful.



Gypsy & Traveller Transit Facility, Westhampnett, West Sussex

Client Involvement

4.03 Regular project design review meetings have been held during the evaluation and design development period with officers from Reading Borough Council.

4.04 At project reviews, brief presentations tabling the current scheme drawings and technical reports permit open discussion covering a wide range of topics including:

- Access
- Massing
- Materials;
- Landscape;
- Security
- Noise
- Layout vs. 'long life/loose fit';
- Health & Safety
- Environmental
- Operations
- Cost
- Programme

4.05 Feedback from these sessions is incorporated as agreed.

4.06 In addition, HCC hold an internal review process culminating in a formal Gateway prior to a planning submission. Here the project is assessed and declared whether fit to proceed or not. There are certain key criteria that must be met regarding time, quality, risk and cost.

Pre-Application Planning Advice

4.07 An informal pre-planning application advice meeting was held with Reading Borough Council planning department. Items discussed included:

- identifying adopted / emerging policies relevant to the development.
- Identify relevant planning considerations.
- Reviewing 'local requirement' documents required for the submission.
- Scope of development
- Provide an indication of any financial contributions (if any) likely to be sought.

Project Aims and Issues

4.09 To develop the option will require capital investment from the Borough Council. Grant funding may be available from central government, but this is uncertain.

4.10 Operational management of the development requires revenue and staff resource, which for permanent accommodation can be mitigated in partnership with private site operators, but for transit facilities such commitment would be the Borough Council's.

4.11 Development of transit facilities would not only

satisfy the demands of the GTAA, but also manage the problems associated with unauthorised encampments in the Borough. For clarity, permanent site facilities only address the demands of the GTAA but do not support management of unauthorised encampments.

Transit Provision

4.08 Transit site provision, by its nature has to be simple and resilient in design, allowing for limited facilities reflecting the impact of high turnover and potential disinterest in the integrity of the site infrastructure. Where transit sites have been constructed the success and longevity of infrastructure has been found to be varied.

Brief

4.12 Key features of the brief include:

- 7no transit pitches
- Bin / recycle waste store zone, easily accessible for use and also for waste collection.
- Simple, clear internal site orientation with easy access to roadways
- Pitch sizes and related accommodation based on a similar provision at Westhampnett Transit facility
- Each pitch to include a sanitary block with private toilet, basin, shower and washing / sink provision
- Power and water connections, with waste disposal facilities
- Play area for younger children
- Picnic area
- Secure boundary
- CCTV security coverage
- Fire precautions measures

4.13 Specialist Senior Gypsy Liaison Officers have assisted developing the following additional commentaries and requirements for the facility to help define appropriate design parameters:

- Transit Site pitches are by agreement between the council and local residents and subject of a licence for site residents for a pre-determined length of stay.
- Height barrier system required for caravan entry / exit to control access / pitch usage
- Pitches should include hard standing / space for a large touring caravan allowing for extended family/ children along with space for 2no vehicles per pitch
- Pitch demarcation with separating walls for fire

resistance (height to be determined) with painted ground lines for parking sub-division.

- Caravans to be centered within pitch zones with cars and trailers to either side to afford fire protection to neighbouring pitches. (Management control).
- Hard standing for Residence to be subject of a site licence stipulating length of stay (weeks / 1 - 3 months)
- Licence to stipulate / be specific to identify the pitch, number of residents per pitch, caravans per pitch and vehicles per pitch
- Basic facilities to include:
 - Connections (prepay / metered) for:
 - potable water
 - electric power
 - Sanitary Block with:
 - light
 - heating (pull cord electric / fan)
 - washing sink
 - toilet
 - basin, mirror, bath / shower
 - Waste disposal
- Sanitary block constructions to include a lockable room (separate access) providing service zone for the water and bathroom plumbing and electrics / consumer unit etc for independent secure maintenance access.
- Electricity by way of prepayment / card – waterproof cabinet inset into building for use by residents with management access, as above
- All internal fittings to be stainless steel and smooth finish with a robust and durable construction on the basis of a wet room design.
- Appreciate and recognise the various members of the community taking up residence – Romany Gypsies / Irish Travellers / New Travellers etc. with a need for clear identification of pitches to avoid potential issues
- Recognition some users will only want a basic pitch not utilising the electric hookup etc – used by those who wish to run of generators. Include stand pipe for water and separate sluice for toilet waste.
- Facilities for rubbish disposal to prevent fly tipping
- Licence to stipulate no business on site including exclusion of bringing commercial waste on to site
- Establish close liaison with local Housing Officers and Police for access, availability and management of pitches
- There are no Government guidelines on prescriptive sizes for transit pitches but a good practical size has been determined working off West Sussex transit pitches which has been included here.

5.00 Design

Approach to Design

5.01 The overall aim of the design programme has been to achieve a design that works in all aspects. This draws upon the particular context and constraints of the site area involved, its accommodation brief, technical requirements, particular site constraints and the objective to maintain a good quality and functional environment within a natural setting, which is functional and in which families can feel safe and secure.

Site Layout

5.02 The proposed layout aims to make best use of the site by drawing upon its configuration, location and surroundings.

5.03 The site is to be fully protected with a new 2m high brick boundary wall, including appropriate pedestrian and vehicle access gates of Island Road. A new vehicular site entrance will be formed with appropriate sight lines suitable for caravan use and with pedestrian pathways with dropped kerbs and tactile paving to ensure safe and unencumbered pedestrian access.

5.04 The main vehicular entrance will be controlled via an automatic rising barrier with overhead height restriction. This barrier will be controlled via appropriate access control systems. This vehicular opening can also be secured with a full height sliding metal gate if required, controlled by RBC Housing officers managing the site, however it is anticipated this will be kept open generally.

5.05 Suitable polyester powdered coated steel pedestrian gates will permit general open public access to the site at all times. Generally these are not to be locked unless agreed otherwise and with suitable safeguards.

5.06 Ground levels are to be raised generally across the site to form a level accessible and safe access into and across the site. Please refer the Ramboll Flood Risk Assessment included in this submission which clarifies how site levels are to be raised to counter potential flood risk.

5.07 An additional maintenance access gate is provided on the southern boundary to provide access to the Swale area and associated landscape environments beyond.

5.08 A broad central roadway leads down the western side of the site affording access to each family pitch.



Site Facilities

5.09 Seven dedicated pitches are provided within the walled site, accessed from Island Road.

5.10 Each pitch provides parking space for a number of standard typical domestic vehicles and caravans etc, arranged in rows, sited across the front / end of the

associated sanitary block. Two cars and two caravans have been assumed per pitch. All outfit configurations, including any cycles, motorbikes and other possessions etc. will be restricted to the area allocated within the pitch, unless agreed otherwise with Housing Officers.

5.11 A children's play area and general picnic area is included for use by site residents only.

5.12 A dedicated waste and recycle bin storage area is also provided with direct internal site access, as well as external access adjacent to Island Road for ease of waste collection.

5.13 Each pitch will be one hour fire protected from the adjacent pitch with a 2m high masonry dividing wall. Services will include electric and water hook up facilities, along with the dedicated sanitary block. This block includes kitchen washing and toilet facilities which are for the sole use of the pitch user. This will provide domestic level facilities. A separate sluice facility is also included accessed from the waste bin compound.

5.14 Each pitch sanitary block facility is typically housed in one half of a larger block for reasons of construction economy. Each pitch unit is fully separated from the adjoining unit with a one hour fire resisting party wall in between. Each side includes a dedicated service zone only be accessible to site managers and other maintenance staff.

The internal layout of each sanitary block is kept simple and efficient in form with direct access prioritised to the kitchen washing area with the supporting private toilet and shower wet room accessed beyond.

Form, Massing & Scale

5.15 The sanitary blocks are simple units with pitched roofs and low key in nature to compliment the scale of the site.

External Appearance & Materials

5.16 For details of the Sanitary blocks, refer drawing number: E03883-HCC-00-XX-DR-A-2000 Proposed Floor Plans & Elevations

5.17 New buildings will comprise single storey cavity brick and block walls, with polyester powder coated heavy duty steel glazed and louvred doors, with simple concrete tiled pitched roofs.

5.18 Perimeter walling comprises solid masonry walling. The sliding metal gate and pedestrian gates with



Aerial View Looking South

be polyester powder coated. Solid full height double timber gates are provided to the bin area to facilitate easy waste collection.

Sustainability & Environmental Control

5.19 The design promotes the efficient use of water and energy, whilst reducing carbon dioxide and other harmful emissions. It encourages recycling, and the reduction of waste.

5.20 The design of the environmental control systems for the new buildings focuses on providing satisfactory levels of comfort while minimising energy consumption. The design makes use of passive systems for environmental control, reducing the dependence upon mechanical plant where possible. Features include:

- Good levels of external wall and roof insulation to reduce heat losses;
- Utilisation of efficient electrical heating and hot water systems;
- High efficiency light fittings with automatic controls;
- High level sound absorbent finishes providing comfortable acoustics.

5.21 A mixture of manual/automatic control systems are proposed, allowing user choice and selection to suit.

Soft Landscape

5.22 The following soft landscape principles are proposed for the development.

5.23 By its nature and due to the constricted width of the site area available, there is very little opportunity for landscape within the boundary of the transit park inside the proposed boundary wall line. The majority of the park requires to be a hard surface concrete finish suitable for vehicular movement and parking. Opportunities are limited to the small pic-nic area and play ground which will include some new tree planting, amenity and soft play woodchip type surfacing. The Transit Park's only real opportunities lay outside the proposed boundary wall line and draw on the recommendations made in the Ecological Assessment.

5.24 Having regard to each boundary condition the following landscape works are proposed:

East 'tree' boundary

- All existing 'crack willows' to be coppiced to 0.5m above ground level. All other small trees to be retained and protected by Tree Protection fencing. Bramble thicket to be cut back to ground level to allow for clearance of debris, rubbish and broken fencing, then allowed to re-grow naturally.
- Maintenance contract to be put in place to keep a 1.2m wide pathway clear on the outside of the wall to allow for maintenance and access.

West 'brook' boundary

- All existing 'crack willows' to be coppiced to 0.5m above ground level. River bank to be re-instated at 45 degrees with site won topsoil and allowed to re-establish with vegetation naturally.
- No maintenance works would be anticipated to this embankment and new saplings, reeds and other vegetation would be allowed to re-grow fully without disturbance. Any tree works required to keep the brook clear and un-blocked would be carried out annually and would be accessed from the opposite river bank.

North 'road' boundary

- Bramble thicket to be cut back to ground level to allow for clearance of debris, rubbish and soil mounding. Wildflower seeding re-instatement to this frontage would provide Ecology mitigation habitat.
- Wildflower meadow areas would be cut back twice a year in mid-autumn and early spring to encourage summer flowering species and prevent saplings/brambles from taking over.

South 'Swale' boundary

- All existing 'crack willows' to be coppiced to 0.5m above ground level. Bramble thicket to be cut back to ground level to allow for clearance of debris, then allowed to re-grow naturally. Ten new trees (8-10cm standards) to be planted around the new Swale to speed up the

regeneration process. Species to be selected from native cherry, maple, alder and hawthorn varieties.

- Swale and surrounding banks would need to be trimmed twice a year to prevent clogging with vegetation. New trees would be established with five years RBC maintenance care. Wider embankment habitat would be allowed to regenerate naturally with no maintenance required.

Hard External Works

5.25 Roadways and parking areas to plots will generally be concrete with suitable line markings. The exceptions being the play ground which will be suitable woodchip.

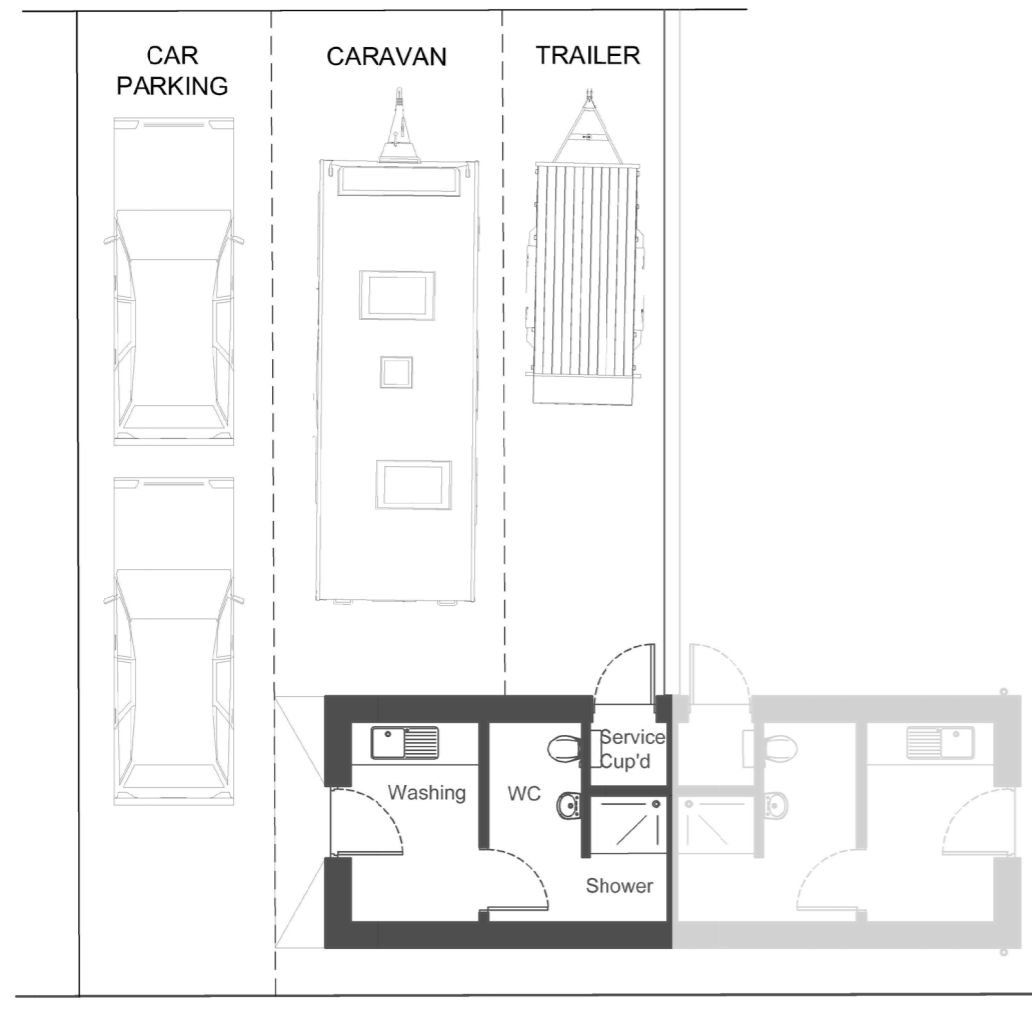
5.26 For parking arrangements please refer site plan drawings along with the Transport Statement.

5.27 A bespoke recycle and waste bin compound is included with separate internal and external access. Waste collection lorries will not enter the site but draw along side in the sites bellmouth entrance to allow for direct and easy bin emptying, limiting disturbance or potential confrontation to transit residents.



Aerial View Looking North East

6.00 Access Proposals



Typical Pitch Layout

Approach to Inclusive Access

6.01 An integrated approach has been adopted, in which the design has been developed in consultation with Reading Borough Council to reflect operational requirements. The objective is to develop an accessible design which is functional and sustainable in the longer term.

6.02 The approach adopted is intended to incorporate, where relevant, the best practice principles and objectives for inclusive and accessible design.

These are:

- To achieve optimum accessibility for all users of the site's facilities;
- To create a secure and welcoming place;
- To design the buildings and the external areas for beneficial use generally;
- To provide spaces which are reasonably flexible in use and adaptable to change;
- To ensure facilities are robust and durable and suited to their use.

Vehicle and Transport Links

6.03 Transport links to the site are described in the Ramboll Transport statement accompanying this application.

Facilities within the Building

6.04 Physical measures incorporated at this stage of the design to aid access include:

- Simple, direct circulation routes to allow unimpeded and unobstructed horizontal movement.
- Level access provided to all building areas, and including level thresholds..

All such elements will be designed in accordance with Approved Document M of the Building Regulations.

Security

6.05 A key design consideration is site and building security. The following passive and active measures are included:

- CCTV coverage of the main entrance, general site area and external building façades, mounted on anti climb poles
- Effective lighting.
- Separate facilities to each plot to avoid misunderstandings re access rights;
- Clear pitch segregation and demarcation;
- Open and visible external circulation around the site and buildings which are well-lit;
- Direct routes of communication to RBC Housing Support officers.
- Site fully enclosed
- Direct pedestrian and vehicular access

Site Operations

6.06 It is proposed users will be able to contact RBC housing support officers from a suitable intercom device at the site entrance as well as via mobile phone, email etc.

6.07 Plots will be allocated and managed by RBC Housing Officers, who will monitor availability, booking, site set up, site use and departure arrangements and include management of any associated matters.



Aerial sketch view looking south



Aerial sketch view looking north west



Sketch view from Island Road

From: Amy Gower <Amy.Gower1@westberks.gov.uk>
Sent: Monday, February 28, 2022 3:50 PM
To: Humphreys, Ethne
Cc: Planning Administration
Subject: RE: Consultation on planning application 212037 - land adjacent to Reading Sewage and Treatment Works, Island Road, Reading
Attachments: AWE Planning considerations 212037.pdf

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Afternoon Ethne,

As the owners of the AWE Off-Site Emergency Plan we support RBC Emergency Planning and the AWE Off-Site Planning Groups response to advise against this application.

Kind Regards

Amy

Amy Gower (she/her)

Emergency Planning Officer

Team: 01635 503535 | emergencyplanning@westberks.gov.uk (office hours only)



From: Patient, Justin [mailto:Justin.Patient@reading.gov.uk]
Sent: 11 February 2022 10:17
To: Humphreys, Ethne <Ethne.Humphreys@reading.gov.uk>
Cc: Planning Administration <Planning.Administration@reading.gov.uk>; Emergency Planning <EmergencyPlanning@westberks.gov.uk>
Subject: Consultation on planning application 212037 - land adjacent to Reading Sewage and Treatment Works, Island Road, Reading

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Good morning Ethne, please find attached a response to the above consultation on behalf of the AWE Off-Site Planning Group.

Kind regards
Justin

Justin Patient

Emergency Planning & Business Continuity
Emergency Planning Unit | Corporate Resources

Reading Borough Council
Civic Offices
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AWE Planning Consultation Considerations re 212037

Consideration	Details				
Planning Application No	212037				
Site Location:	Land adjacent to Reading Sewage and Treatment Works Island Road Reading				
Description of development:	The application proposal is for a gypsy and traveller transit site. A transit site is "A 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				
Is the proposed development within the relevant site DEPZ or area of Extendibility?	DEPZ				
If yes, within which sites DEPZ or area of extendibility does the application fall within (Aldermaston/Burghfield):	AWE Burghfield				
If yes which Sector is the proposal within?	B				
Current Demographic Information within Sector the sector and 2 adjacent sectors. (In any incident at least, the sector affected and the 2 on either side are alerted in order to allow for drift etc)	Sector	Residential	Residents	Commercial	Employees
	A	31	74	25	
	B	1264	3033	85	
	C	9	21	121	
	Totals	1304	3128	231	
Is the proposal for:					
Residential	Yes				
What is the increase in Population Density within the Sector (Based on the average household size to be 2.4 persons per household and details in application relating to employees for business developments)	N/A				
Commercial	No				
Are there details of any Site Emergency Plan in place	No				
Are there any vulnerable developments proposed?	No				
What applications are approved in the sector but not completed (still valid)	Unknown at time of drafting this response				

	Consideration	Impact on AWE Off-site Emergency Plan
1	Within DEPZ area or OPZ	DEPZ
2	Proximity to Site Boundary	3km
3	Impact on short term Sheltering – 24 – 48hrs	Caravans are not a suitable means of providing shelter from an incident at AWE. This Gypsy and Traveller site proposes to have brick-built utility blocks, but these are unlikely to be suitable for up to 48 hours of sheltering from a welfare perspective (adequate amounts of food, space for sleeping arrangements). Furthermore, the reliance upon a utility building may require those on the site to leave their accommodation to access the utility block for welfare purposes and this has the potential to increase exposure to airborne radioactive material.
4	Impact if requirement for Medium/Long term Sheltering 48hrs+	Caravans are not a suitable means of providing shelter from an incident at AWE for any period of shelter arrangements.
5	Requirement for Immediate Evacuation & Impact –including reception and rest centre	Due to the lack of suitable protective structures the residents are at a higher risk of immediate evacuation being required. In the event of evacuation being required, or post-sheltering permanent or temporary relocation, priority would need to be given to those in less suitable structures. This increases the resources required to respond to the emergency and has the potential to decrease the effectiveness of the arrangements due to delaying the evacuation/relocation of other, pre-existing, communities. This would also have an impact on the number of reception centres and rest centres required.
6	Impact if requirement for subsequent Evacuation—including reception and rest centre	Due to the application type, shelter would not be viable and therefore additional residents would need to be moved off site for radiation monitoring & possible decontamination. It is unlikely that vehicles would be able to be removed from site as they could be contaminated. Onward transportation would need to be sourced, placing a burden upon the Local Authority who would be asked to assist in these circumstances. This would also have an impact on the number of reception centres and rest centres required.
7	Impact on Warning & Informing processes	Normal warning and informing processes for the AWE system relies upon a live landline phone connection, the transient nature of the residents expected to occupy this proposed development will add to the challenges in communicating the required safety information/warning and informing advice, when there are no landline phones and community are unlikely to have seen the REPIR public information booklet. The difficulty communicating with an even larger population in an incident are significant, especially around the differences to the possibility of lifting shelter for DEPZ but not the UPA.
8	Day time or night time impact	No difference to the impact
9	Vulnerable People considerations	Due to the transient nature of the proposal it would be unrealistic for the Local Authority to maintain accurate data on vulnerable residents.

10	Impact on plan from External issues e.g. parents wanting access to children etc.	Unlikely to have an impact due to transient nature of the proposal
11	Access and Egress Routes	On main artery route
12	Recovery implications	Possible decontamination challenges due to construction of caravans, this may result in total loss. Lack of available suitable alternative housing in the area would add pressure to Local Authority.



Summary of Considerations:

The application site is within the DEPZ of AWE (B) site but outside the area where urgent protective actions are necessary.

Recommendation to Planning Authority: Considering all the above points the AWE Off-site planning group considered the impact of the application on the AWE Off-Site Plan. It was noted that all agencies that identified an impact on their response to an

AWE Offsite incident were in support of this recommendation. Granting permission for this site would set a precedence that sheltering in this type of accommodation is acceptable for any future application at this site or any other DEPZ in the UK. As a result, due to the impact on responding agencies and the potential impact on the occupants of the proposed development **the AWE Offsite Planning Group recommended that the Planning Authority refuse the application.**

AWE Planning Consultation Considerations re 212037

Consideration	Details																									
Planning Application No	212037																									
Site Location:	Land adjacent to Reading Sewage and Treatment Works Island Road Reading																									
Description of development:	The application proposal is for a gypsy and traveller transit site. A transit site is "A 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																									
Is the proposed development within the relevant site DEPZ or area of Extendibility?	DEPZ																									
If yes, within which sites DEPZ or area of extendibility does the application fall within (Aldermaston/Burghfield):	AWE Burghfield																									
If yes which Sector is the proposal within?	B																									
Current Demographic Information within Sector the sector and 2 adjacent sectors. (In any incident at least, the sector affected and the 2 on either side are alerted in order to allow for drift etc)	<table border="1" style="width: 100%; text-align: center;"> <thead> <tr> <th>Sector</th> <th>Residential</th> <th>Residents</th> <th>Commercial</th> <th>Employees</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>31</td> <td>74</td> <td>25</td> <td></td> </tr> <tr> <td>B</td> <td>1264</td> <td>3033</td> <td>85</td> <td></td> </tr> <tr> <td>C</td> <td>9</td> <td>21</td> <td>121</td> <td></td> </tr> <tr> <td>Totals</td> <td>1304</td> <td>3128</td> <td>231</td> <td></td> </tr> </tbody> </table>	Sector	Residential	Residents	Commercial	Employees	A	31	74	25		B	1264	3033	85		C	9	21	121		Totals	1304	3128	231	
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Is the proposal for:																										
Residential	Yes																									
What is the increase in Population Density within the Sector (Based on the average household size to be 2.4 persons per household and details in application relating to employees for business developments)	N/A																									
Commercial	No																									
Are there details of any Site Emergency Plan in place	No																									
Are there any vulnerable developments proposed?	No																									
What applications are approved in the sector but not completed (still valid)	Unknown at time of drafting this response																									

	Consideration	Impact on AWE Off-site Emergency Plan
1	Within DEPZ area or OPZ	DEPZ
2	Proximity to Site Boundary	3km
3	Impact on short term Sheltering – 24 – 48hrs	Caravans are not a suitable means of providing shelter from an incident at AWE. This Gypsy and Traveller site proposes to have brick-built utility blocks, but these are unlikely to be suitable for up to 48 hours of sheltering from a welfare perspective (adequate amounts of food, space for sleeping arrangements). Furthermore, the reliance upon a utility building may require those on the site to leave their accommodation to access the utility block for welfare purposes and this has the potential to increase exposure to airborne radioactive material.
4	Impact if requirement for Medium/Long term Sheltering 48hrs+	Caravans are not a suitable means of providing shelter from an incident at AWE for any period of shelter arrangements.
5	Requirement for Immediate Evacuation & Impact –including reception and rest centre	Due to the lack of suitable protective structures the residents are at a higher risk of immediate evacuation being required. In the event of evacuation being required, or post-sheltering permanent or temporary relocation, priority would need to be given to those in less suitable structures. This increases the resources required to respond to the emergency and has the potential to decrease the effectiveness of the arrangements due to delaying the evacuation/relocation of other, pre-existing, communities. This would also have an impact on the number of reception centres and rest centres required.
6	Impact if requirement for subsequent Evacuation—including reception and rest centre	Due to the application type, shelter would not be viable and therefore additional residents would need to be moved off site for radiation monitoring & possible decontamination. It is unlikely that vehicles would be able to be removed from site as they could be contaminated. Onward transportation would need to be sourced, placing a burden upon the Local Authority who would be asked to assist in these circumstances. This would also have an impact on the number of reception centres and rest centres required.
7	Impact on Warning & Informing processes	Normal warning and informing processes for the AWE system relies upon a live landline phone connection, the transient nature of the residents expected to occupy this proposed development will add to the challenges in communicating the required safety information/warning and informing advice, when there are no landline phones and community are unlikely to have seen the REPIR public information booklet. The difficulty communicating with an even larger population in an incident are significant, especially around the differences to the possibility of lifting shelter for DEPZ but not the UPA.
8	Day time or night time impact	No difference to the impact
9	Vulnerable People considerations	Due to the transient nature of the proposal it would be unrealistic for the Local Authority to maintain accurate data on vulnerable residents.

10	Impact on plan from External issues e.g. parents wanting access to children etc.	Unlikely to have an impact due to transient nature of the proposal
11	Access and Egress Routes	On main artery route
12	Recovery implications	Possible decontamination challenges due to construction of caravans, this may result in total loss. Lack of available suitable alternative housing in the area would add pressure to Local Authority.



Summary of Considerations:

The application site is within the DEPZ of AWE (B) site but outside the area where urgent protective actions are necessary.

Recommendation to Planning Authority: Considering all the above points the AWE Off-site planning group considered the impact of the application on the AWE Off-Site Plan. It was noted that all agencies that identified an impact on their response to an

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From: ONR Land Use Planning <ONR-Land.Use-Planning@onr.gov.uk>
Sent: Wednesday, March 2, 2022 10:13 AM
To: Humphreys, Ethne
Cc: Planning Administration
Subject: ONR Land Use Planning - Application 212037
Attachments: ONR.doc; image001.jpg

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Sir/Madam,

I apologise for the delay to our reply.

I have consulted with the emergency planners within Reading Borough Council, which is responsible for the preparation of the off-site emergency plan required by the Radiation (Emergency Preparedness and Public Information Regulations) (REPPiR) 2019. They have not been able to provide me with adequate assurance that the proposed development can be accommodated within their off-site emergency planning arrangements.

Therefore, ONR advises against this development, in accordance with our Land Use Planning Policy (<http://www.onr.org.uk/land-use-planning.htm>).

I would be grateful if you would notify ONR of the outcome of the determination of this application via email to ONR-Land.Use-Planning@onr.gov.uk.

Kind regards,

Land Use Planning
Office for Nuclear Regulation
ONR-Land.Use-planning@onr.gov.uk

-----Original Message-----

From: Hickey, Sian <Sian.Hickey@reading.gov.uk >

To: onr-land.use-planning@onr.gov.uk;

Cc:

Sent: 07/02/2022 09:26

Subject: Consultation on planning application 212037 - land adjacent to Reading Sewage and Treatment Works, Island Road, Reading

Please see attached.

Kind regards,

Sian Hickey

Technical Support

Planning

Reading Borough Council

Civic Offices, Bridge Street, Reading, RG1 2LU

sian.hickey@reading.gov.uk

Monday-Wednesday.

[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)



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Office for Nuclear Regulation
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Frances Martin
Executive Director for Economic Growth
and Neighbourhood Services

Civic Offices, Bridge Street,
Reading, RG1 2LU

☎ 0118 9373787

Our Ref: 212037

Your Ref: PP-10425095-v2

Direct: ☎ 01189374085

e-mail: Ethne.Humphreys@reading.gov.uk

7 February 2022

Your contact is: Ethne Humphreys, Planning

Dear Sir/Madam

CONSULTATION ON A PLANNING APPLICATION

Application Reference: 212037

Application Type: Full Planning Approval

Address: land adjacent to Reading Sewage and Treatment 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.

This letter is to advise you that the above application has been submitted to Reading Borough Council Planning Department.

Details of the application can be viewed on the Council's 'Planning Registers' website at http://planning.reading.gov.uk/fastweb_PL/welcome.asp (You may access the internet at Civic Offices or Reading Libraries during normal opening hours). Please allow 1 working day for documents to be viewable.

If you require any further information please contact me on the above telephone number or email.

Please send any comments to me by **28 February 2022**. I cannot guarantee that comments received after this date will be taken into account when determining the decision. Ideally, email your comments to the email address above, including your postal address, or you may respond by letter.

Please do not comment via 'Online Registers for Planning & Building Control'. Please email the case officer above and CC in plgadmin@reading.gov.uk

If I have not heard from you by the deadline above I will assume that you have no objections or comments to make and I will determine the application accordingly. Please let me know if you are not able to respond by the above date.

All comments received will be taken into consideration when a decision is made, and will be available for public inspection.

Yours faithfully

Ethne Humphreys



Reading

Borough Council

Working better with you