

**River Academy: Land at and
adjacent to the Former
Leaderboard Golf Centre
Richfield Avenue Reading
Berkshire RG1 8EQ**

Sequential Assessment

**On behalf of Bowmer + Kirkland and the Department for
Education**

December 2021



Contents

1 Background and Planning Policy Context..... 2

 Background 2

 Planning Policy 2

 National Planning Policy Framework..... 2

 Reading Development Plan..... 3

2 Sequential Assessment..... 5

 Methodology 5

 Needs Assessment..... 5

 Catchment Area 6

 Site Identification and Suitability 7

 Site Assessment 8

3 Summary and Recommendations 17

1 Background and Planning Policy Context

Background

- 1.1 Nexus Planning have been instructed by our client, Bowmer and Kirkland (the applicant) to undertake a sequential assessment to assess the planning suitability of potential sites for a new secondary school in Reading. The proposed development site is the Former Leaderboard Golf Club, Richfield Avenue, RG1 8EQ (the application site).
- 1.2 Bowmer + Kirkland are a leading construction and development company which specialise in a number of key sectors, one of which being the education sector. They were appointed to the Department for Education's National Framework in 2013 and have delivered a significant number of new and replacement education facilities, totalling over £500M.
- 1.3 The proposed development The demolition of existing driving range structures and the development of a new three-storey 8 form entry school for years 11 – 16, including a SEND unit and 300 place 6th form (total school capacity of 1500 pupils) including the creation of a new access from Richfield Road, new parking area, cycle parking landscaped areas, external play areas, Multi Use Games Area (MUGA) and sporting pitches.
- 1.4 The proposed application site measures 5.43ha in size, including the parking area to the south which will be used by the school, but will be retained in the ownership of Reading Council. The site is located to the north of Richfield Avenue, to the south of the river Thames and to the east of the Reading Festival site. The site is located within Flood Zone 2 and 3a and it falls within an area of Local Green Space and within a Major Landscape Area.
- 1.5 Due to the location of the site within Flood Zone 2/3 a sequential assessment is required be undertaken to ascertain whether there are any suitable alternative sites which maybe sequentially preferable for the proposed new 8-form mainstream secondary school for 1500 pupils.

Planning Policy

National Planning Policy Framework

- 1.6 Paragraph 95 of the NPPF stresses the importance of a sufficient choice of school places being available to meet the needs of communities. Local planning authorities are directed to take a

proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. Paragraph 95(a) confirms that great weight should be given to the need to create schools, while Paragraph 96(b) requires that Council's must work with promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

- 1.7 Paragraph 167 requires, when determining a planning application, that local planning authorities should ensure that flood risk is not increased elsewhere, applications should be supported by a flood-risk assessment (and the sequential and exceptions tests, as applicable) and development should only be allowed where it can be demonstrated that:
- a. within the site, the most vulnerable development is located in areas of lowest flood risk;
 - b. the development is appropriately flood resistant and resilient;
 - c. it incorporates sustainable drainage systems;
 - d. any residual risk can be safely managed; and
 - e. safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Reading Development Plan

- 1.8 The adopted The Local Development Plan for Reading Borough Council comprises the following:
- Local Plan (2019);
 - Proposals Map (2019); and
 - The Central and Eastern Berkshire Minerals and Waste Plan (2020).
- 1.9 Policy EN18 of the Local Plan states that, in the first instance, development will be directed to areas at lowest risk of flooding following the Sequential and Exceptions tests set out in the NPPF and taking account of the effects of climate change.
- 1.10 Policy EN7 protects Local Green Space (LGS) from development. Proposals that would result in the loss of designated areas of open space (including the Rivermead and Thameside Promenade), erode

their quality through insensitive development or jeopardise their use or enjoyment to the public, will not be permitted.

- 1.11 Policy EN13 states that planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature, including the Thames Valley.
- 1.12 Policy WR3 designates various sites for development in West Reading and Tilehurst, the site to the east of the application site, is designated via WR3(d) for the "Rivermead Leisure Centre, Richfield Avenue". Due regard is to be had to ensuring the deliverability of this designation.

2 Sequential Assessment

Methodology

Needs Assessment

- 2.1 Section 14(1) of the Education Act 1996 requires that a local education authority must provide sufficient schools for providing primary and secondary education in their area. This section of the assessment looks at identifying the local need for schools similar to the proposal.
- 2.2 There are currently 67 maintained schools, academies and free schools in Reading, including:
- 7 nurseries;
 - 37 primary schools;
 - 10 secondary schools;
 - 4 SEN schools; and
 - 18 independent schools.
- 2.3 The Brighter Futures for Children School Place Planning document (2019) details that Reading has also experienced a population growth rate of 0.9% between mid-2014 and mid-2019 and an overall decrease in birth rates, with an average of 1.71 children per mother being born in 2019.
- 2.4 In 2019, the overall Primary School population was 11,135, whereas the overall Secondary School population was 9,081. Three secondary bulge classes plus 12 additional places were negotiated for September 2019; there are a few schools remaining in Reading with the capacity for bulge classes or additional pupils and there are also significant additional costs in providing temporary accommodation.
- 2.5 The below table indicates the school aged population growth projections between 2011 and 2023:

Year	2011	2016	2023	% change 2016 to 2023
Age				
5 – 10	10,118	13,068	13,263	1.49%
11 – 15	8,061	8,198	10,688	30.37%

16 – 19	8,154	7,971	8,667	8.73%
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- 2.6 The above results show a significant projected population increase for 11 – 15 year olds and for 16 – 19 year olds between 2016 and 2023. The projected population grown demonstrates a pressing need for new secondary school places for ages 11 – 15 and 16 – 19 year olds. It is therefore clear that there is an identified need for addition school places secondary schools within Reading.
- 2.7 Furthermore, the previous 33.7% growth in primary school numbers is now plateauing, however this has now translated to a marked increase in the need for secondary school places as this cohort progresses to secondary school age.
- 2.8 In West Berkshire, 3.1% of students were attending schools in neighbouring local authorities, representing a net in-migration, which places additional pressure on the existing local schools.
- 2.9 The Reading Local Plan also confirmed that that there is an identified need for one new secondary school per 6,000 dwellings delivered in the borough.
- 2.10 Overall, pupil place needs projections across Reading are based on:-
- Birth data;
 - Population projections of children due to start in Year 7;
 - Historic pupil data to project the number of pupils in other year groups;
 - The impact of new residential developments, and the associated number of children they may be sustained by new housing;
 - Inward and outward migration from neighbouring local authorities
- 2.11 The above considerations have determined the need for a new secondary school within Reading.

Catchment Area

- 2.12 Online data from the locrating.com, which provides; schools information, admissions data and catchment area, Ofsted rating of schools within Reading. It is apparent from Locrating that there is a dominance of secondary schools within the south and eastern areas of the Borough and there is also qualitative bias with many of these schools rated 'outstanding' by Ofsted. There is a

corresponding undersupply of secondary schools within the west of the borough. The application site is positioned to the north west of the Borough, and is located within an area which displays an undersupply secondary schools.

- 2.13 The catchment areas for schools within Reading generally appears to range between 1 and 3 miles. The Department for Education's July 2014 *"Home to school travel and transport guidance Statutory guidance for local authorities"* prescribes a recommended school travel distance of 3 miles, as this is considered a distance which is not an impediment to walking or cycling to school. Considering that, the extents of the borough do not extend significantly further than 3 miles from the Reading town a catchment area for the sequential assessment has been extended to include the whole borough.

Site Identification and Suitability

- 2.14 We have adopted a sequential approach to identify potential alternative sites for the proposed new school. The site size and site locations has been be informed by the nature and operative requirements of the proposed development and the criteria it is need to meet the site size requirements as set out in the Department for Education's BB103 Standards.
- 2.15 The BB103 standards sets out the site area requirements for a mainstream secondary school of 1,500 pupils and therefore sites have been identified based on a minimum site area of **2.3ha** and a maximum size of **8.4 ha**. Sites which are too small or significantly too large have been filtered out of the assessment as they are not appropriate for the proposed development.
- 2.16 Reading's 2017 Housing and Economic Land Availability Assessment ("HELAA") confirms the need for a secondary school on a site which was to be confirmed. It predicts an allowance of 6,720sqm and justifies this allowance based on the higher density nature of the Borough as compared to the rest of Berkshire. It is noted that a site of 0.7 ha would not provide a school which is capable of meeting the current school need, such as site is furthermore unlikely to provide extra play and PE areas and accordingly would not be able to provide the curriculum requirements on site.
- 2.17 This sequential assessment has utilised Local Plan allocations, the RBC HELAA, the RBC brownfield register, planning permissions, SHLAA data and property agent searches. The suitability of the sites has been considered based on their size; location; availability; and constraints.
- 2.18 When assessing whether a site is suitable for the proposed 8 form entry mainstream secondary school, factors which will be considered include the following:

- Availability – the site needs to be available for development in the short term to meet the Council’s need for school places.
- Access – the site needs to be accessible for staff, pupils and visitors, including those with disabilities;
- Ground conditions – the underlying ground conditions need to be suitable for development;
- Higher values for alternative uses – pressure for higher value uses, will often negatively impact the ability of the DfE to deliver a viability scheme;
- Neighbouring land uses – should not be adjacent to sites such as industrial land uses which may harm pupils through noise/air pollution;
- Ecological constraints and tree preservation orders – this would restrict the development potential of the site;
- Contamination – a contaminated site needs to be able to be feasibly remediated;
- Conservation areas – may impose design restrictions on development;
- Flood risk – may restrict the developable area or add to the costs of development.

2.19 The application site was selected due to its overall consistency in terms of the above factors. It is considered that with suitable mitigation and design measures in place, the application site presents the most suitable available site for the proposed development and furthermore provides numerous benefits, which will outweigh the loss of local green space.

Site Assessment

2.20 The following section sets out the assessment of the alternative sites found within the proposed catchment area of the administrative boundary of Reading Council.

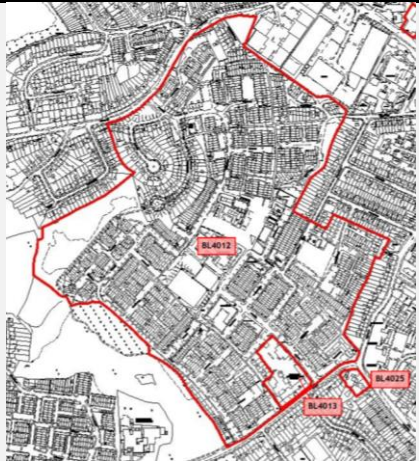
2.21 Using the methods stated in paragraph 2.14, the following sites have been identified as those which require further investigation in relation to the proposed development:

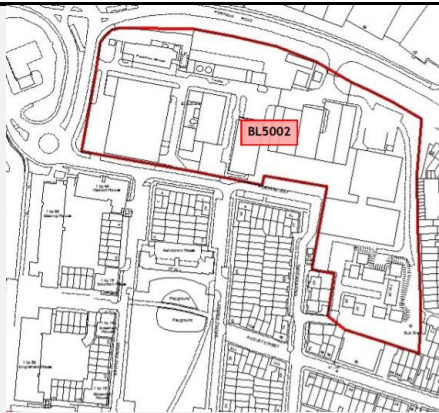
- Cattle Market, Great Knolly’s Street;
- Phase 3 Dee Park Estate, Spey Road;

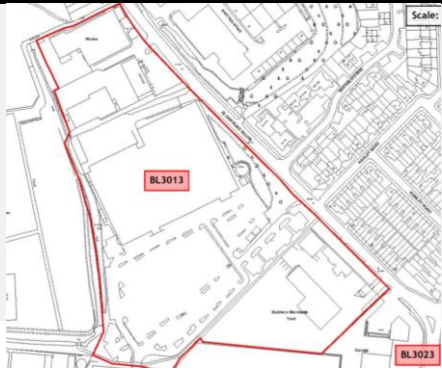
- Land north of Manor Farm Road Major Opportunity Area;
- Part of Former Battle Hospital;
- South of Elgar Road;
- Hosier Street;
- Broad Street Mall;
- Forbury Retail Park.

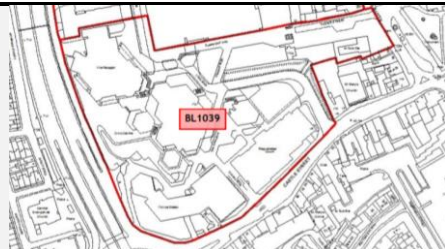
2.22 An analysis of each of these sites is set out in the table below.

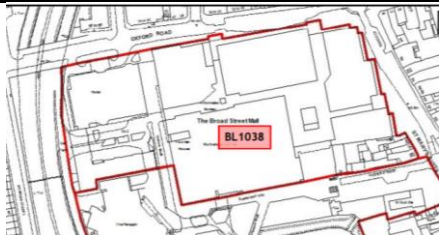
Site Name	Cattle Market ("BL1033")	
Size, Location and Context	2.46ha; Great Knollys Street, RG1 7HN; brownfield site located adjacent to existing Academy and railway with residential to the south	
Constraints	Air Quality Management Area, Office Core Policy	
Comment	Site is an allocated development site retail and residential uses, the use for a school would therefore represent a departure from planning policy. The Local Plan notes the site as being deliverable in the long term. The site is currently developed with existing buildings which would need to be demolished, thus adding to development costs and timeframes. The site's position adjacent to the railway line / station and within an Air Quality Management Area constrains the delivery of a secondary school, due to air quality concerns and noise impacts.	

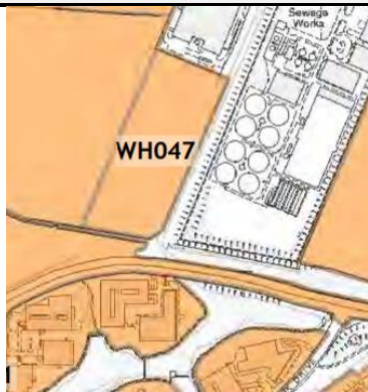
Conclusion	The site is unavailable in the short term and is unsuitable for delivering a new 8-form entry mainstream secondary school within the required timeframes.	
Site Name	Phase 3, Dee Park Estate ("BL4012")	
Size, Location and Context	16.4ha; Spey Road; existing primary school is central within the site, surrounded predominantly by residential properties, area of greenspace to the west of the site	
Constraints	Local Green Space and Public Open Space, Area of identified biodiversity interest	
Comment	Site is allocated in the brownfield register for a mix of uses including residential, retail and the redevelopment of a primary school of 6000sqm; the area for school redevelopment is relatively restricted by the surrounding residential properties which will be allocated for replacement residential development and the existing primary school site would be too small for a 1500 pupil secondary school. The use of the site for a secondary school would preclude the delivery of a primary school, as identified and allocated for the site.	
Conclusion	The site is unsuitable for delivering a new 8-form entry mainstream secondary school within the required timeframes.	
Site Name	Land north of Manor Farm Road	
Size, Location and Context	13.69ha; to the west of Basingstoke Road and to the south of Brunel Retail park; residential to the far east and west, retail and industrial uses to the north and south	

Constraints	Air Quality Management Area, Adjacent to Core Employment Area and Local Green Space	
Comment	The site is allocated in the Local Plan for a mix of uses, including unspecified school provision. The Local Plan notes the site as being deliverable in the long term. The site is currently developed with existing buildings which would need to be demolished, thus adding to development costs and timeframes. The site is in mixed ownership, which would constrain deliverability. The site is partially within an Air Quality Management Area and would be subject to noise impacts from surrounding roads, would constrain the delivery of a secondary school, due to air quality concerns and noise impacts.	
Conclusion	The site is unavailable in the short term and is unsuitable for delivering a new 8-form entry mainstream secondary school within the required timeframes.	
Site Name	Part of former Battle Hospital ("BL5002")	
Size, Location and Context	2.77ha; south of Portman Road; residential properties to the south and east, employment and industrial uses to the north, petrol station to the west	
Constraints	Allocated for residential uses. Adjacent to Core Employment Area	
Comment	Permission has been granted for 211 dwellings indicating preference for residential development; and substantially increasing the	

	site value. The site is allocated for residential development, and development has been largely carried out, the site is therefore not considered available. The use for a school would therefore represent a departure from planning policy.	
Conclusion	The site has been largely delivered for residential use and is therefore unavailable and is unsuitable for delivering a new 8-form entry mainstream secondary school within the required timeframes.	
Site Name	South of Elgar Road ("BL3013")	
Size, Location and Context	5.38ha; west of Elgar Road South; residential uses to the east, industrial and employment uses to the south and north east	
Constraints	Allocated for residential and supporting community uses. Adjacent to Core Employment Area and Local Green Space. Archaeological potential.	
Comment	The site is allocated for residential development and education use would constitute a departure from policy. The Local Plan notes the site as being deliverable in the long term. The site is currently developed with existing buildings which would need to be demolished, thus adding to development costs and timeframes and affecting the sites ability to meet the current education need within the required timeframes. Siting adjacent to industrial and employment uses would be unsuitable for a secondary school	

	and would restrict outdoor uses due to potential noise pollution.	
Conclusion	The site is unavailable in the short term and is unsuitable for delivering a new 8-form entry mainstream secondary school within the required timeframes.	
Site Name	Hosier Street ("BL1039")	
Size, Location and Context	3.41ha; north of Castle Street; to the east of the A329; residential to the south and further west, retail to the north	
Constraints	Air Quality Management Area, Area of Archaeological Potential, Allocated development site, Tall Buildings Cluster, Primary Shopping Area, Central Core, Office Core, Adjacent to Conservation Area	
Comment	Identified as an LPA owned retail site in the brownfield register. The site is allocated for residential use along with town centre uses. The Local Plan notes the site as being deliverable in the medium term. The site is currently developed with existing buildings which would need to be demolished, thus adding to development costs and timeframes and affecting the sites ability to meet the current education need within the required timeframes. The site is adjacent to the busy highway which would could rise to noise pollution and air quality impacts. The site is located within an established retail area with a number of retail designations	

Conclusion	The site is unavailable in the short term and is considered unsuitable for delivering a new 8-form entry mainstream secondary school within the required timeframes.	
Site Name	Broad Street Mall ("BL1038")	
Size, Location and Context	2.75ha; north of Hosier Street site ("BL1039"); to the east of the A329; residential to the far south and west, retail to the north and immediate south	
Constraints	Air Quality Management Area, Area of Archaeological Potential, Tall Buildings Cluster, Primary Shopping Area, Allocated development site, Central Core, Office Core, Adjacent to Conservation Area	
Comment	An existing application is pending decision on the site which would affect the availability of the site. The site is allocated for retail and leisure use, the use of the site for a school would be a policy deviation. The site is noted as being deliverable in the medium term. The site is currently developed with existing buildings which would need to be demolished, thus adding to development costs and timeframes and affecting the sites ability to meet the current education need within the required timeframes. Site is adjacent to the busy highway which would give rise to air and noise pollution	
Conclusion	The site is unavailable in the short term and is unsuitable for accommodating an 8-form entry mainstream secondary school.	

Site Name	Forbury Retail Park ("BL1026a")	
Size, Location and Context	3.97ha; retail and industrial uses to the east and south; railway line to the north	
Constraints	Air Quality Management Area, Area of Archaeological Potential	
Comment	Allocated for new residential community, and, alongside residential, additional retail, leisure and community uses, the use of the site for a school would be a policy deviation. The site is noted in the local plan to be deliverable in the medium term. The site is currently developed with existing buildings which would need to be demolished, thus adding to development costs and timeframes. Siting adjacent to a busy railway and within an Air Quality Management Area, the site is thus constrained by noise and air quality constraints.	
Conclusion	The site is unavailable in the short term, the site is unsuitable for delivering a new 8-form entry mainstream secondary school within the required timeframes	
Site Name	South of Smallmead MRF ("WH047")	
Size, Location and Context	3.79ha; north of Longwater Avenue; newbuild residential to the south west, busy highway to the south, industrial use to the north and east	
Constraints	Adjacent to Area of Archaeological Potential, adjacent to Core Employment Area, adjacent to Area of identified biodiversity interest	
Comment	Rural vacant land allocated for industrial/warehouse use in the local plan.	

	Development for a school would represent a policy departure. The development of the surrounding area for industrial and warehouse uses is considered to result in an unsuitable location for a school. Access and public transport to this site is poor. The site on the edge of the borough is less accessible for the identified catchment.	
Conclusion	The site is unsuitable for delivering a new 8-form entry mainstream secondary school within the required timeframes	

3 Summary and Recommendations

- 3.1 Further to the above site analysis, this section sets out the conclusions and recommendations of the sequential assessment.
- 3.2 As established within Reading Council's the Pupil Place Planning Report, it is clear that there is a shortfall of secondary school places within Reading, with a particular shortage within the north west of the Borough. The application site is positioned within this area which will effectively cater to the needs of the appropriate pupils within the Borough.
- 3.3 Due to the site's location within Flood Zone 2/3a and as required by national and local planning policy, a search was undertaken to determine whether there are any sequentially preferable sites for an 8 form entry mainstream secondary school using a catchment area covering the entire Borough.
- 3.4 Based on the minimum site area of 2.3ha, a total of 9 sites were identified within the Local Plan, HELAA and brownfield register. 7 of the 9 sites were allocated for purposes other than education uses, predominantly residential retail or industrial uses, many of these sites have medium and long term delivery timeframes, and are therefore not currently available for development. A number of assessed sites are located near to the edge of the borough with poor accessibility and public transport.
- 3.5 No sites have been identified which are sequentially preferable, available and deliverable to the application site. Appropriate design and mitigation measures have been incorporated within the design to ensure that the school is appropriately safeguarded from the risks of flooding. Furthermore the design has ensured that the risk of flooding on the site and elsewhere is not increased through creating addition on site flood volume. The proposed development will meet an important need for school places within this part of the Borough in a well located area. The site is furthermore presently available for development and the school can accordingly be delivered and meet the current need for school places without delay.

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