

## COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: July 21<sup>st</sup> 2021

Ward: Peppard

App No.: 210018

Address: Reading Golf Club, 17 Kidmore End Road, Emmer Green

Proposal: Outline planning application, with matters reserved in respect of Appearance, for demolition of the existing clubhouse and the erection of a new residential-led scheme (C3 use to include affordable housing) and the provision of community infrastructure at Reading Golf Club

Applicant: Fairfax (Reading) Limited and Reading Golf Club Limited

Deadline: Original 16 week date 18/5/2021 - Extended to 30/7/2021

### RECOMMENDATION:

**REFUSE** planning permission for the following reasons:

1. The application site forms a significant area of Undesignated Open Space within Reading Borough. The application proposals fail to either provide suitable upgraded/enhanced open space within the application site due to the loss of a significant part of this space through built form and related enclosed domestic gardens, roads and driveways and quality of open space provided; or on the remainder of the golf club land; or demonstrate that a suitable off-site compensation arrangement is deliverable to provide additional recreational open space, sufficient to outweigh this harm. The Layout applied for in this application proposal will therefore lead to an unacceptable erosion of open space opportunities on the site/in the local area, contrary to Policy EN8 (Undesignated Open Space) of the adopted Reading Borough Local Plan (2019).
2. The outline application has failed to demonstrate how the proposed Layout, Scale and Landscaping would bring forward an acceptable development of up to 257 residential units with public open space and a Health Care Facility for the following reasons:
  - The uniformity of the layout leads to repetitious groupings of buildings across the site failing to create a development with its own identity, character areas and a strong sense of place;
  - Poor relationship of the proposed Layout and Scale of buildings and plots would lead to an adverse effect on retained protected trees in terms of pressure to fell; and compromise the functionality of amenity space in particular for plots 1, 21-24, 49, 78 & 84, 8-15, 59-66 and 161-164;
  - Fails to suitably enhance/retain a continuous green link for ecology through the site;
  - There is a failure to provide suitable usable areas of on-site open space for the needs of the residents of the development due to the quality of provision of green infrastructure and landscaping as these areas are fragmented and eroded by road infrastructure and poor quality communal spaces;
  - By building so close to the adjacent open space the layout would introduce unacceptable urbanisation on the settlement edge blurring the distinction between urban and rural failing to preserve, enhance or respond positively to the

local context of this sensitive urban fringe location of the Borough and to the detriment of the pleasant landscape character of this part of Reading.

Therefore, this outline application is considered to be unsympathetic to the landscape setting of the site leading to overdevelopment of the site, contrary to the objectives of Reading Borough Local Plan Policies EN9 (Provision of Open Space); EN12 (Biodiversity and the Green Network); CC7 (Design and the Public Realm); EN14 (Trees, Hedges and Woodlands) and H10 Private and communal Outdoor Space, paragraph 127 of the NPPF and objectives of the adopted Reading Borough Council Tree Strategy (2021) and Reading Biodiversity Action Plan (2021).

3. The proposal fails to propose any improvement to the Peppard Road / Kiln Road / Caversham Park Road junction to mitigate the impact of the development, this would result in a material detrimental impact on the functioning of the transport network contrary to Reading Borough Local Plan Policy TR3.
4. The proposal results in a net loss of biodiversity within the site, where it is not considered that there are exceptional circumstances, where the need for development clearly outweighs the need to protect the value of this substantial area of open space, to justify the provision of off-site compensation to ensure there is no loss of biodiversity. The proposal is therefore contrary to Reading Borough Local Plan Policy EN12 Biodiversity and the Green Network and paragraph 175 of the National Planning Policy Framework (2019)
5. The proposal fails to make an appropriate contribution to the housing needs of the Borough, fails to mitigate its impact on the social and economic infrastructure of the Borough, fails to make an appropriate contribution to the provision and improvement of existing open space in the borough, fails to acceptably adapt to climate change, achieve zero carbon homes standards and not provide appropriately towards energy infrastructure, fails to implement measures to improve sustainable transport facilities and meet the objectives of the Local Transport Plan, and fails to mitigate and compensate the ecological impacts of the development.

The proposal is therefore contrary to Policy CC3, CC4, CC6, CC7, CC9, EN9, EN12, EN15, H3, H5, TR1, TR3 and OU1 of the Reading Borough Local Plan (2019), the National Planning Policy Framework (2019) and the following adopted Reading Borough Supplementary Planning Documents: Affordable Housing (March 2021); Employment, Skills and Training (2013); Revised Parking Standards and Design (2011); Planning Obligations under Section 106 (2015); Sustainable Design and Construction (2019).

**Informative:**

1. Drawings and documents that the decision relates to
2. Positive and proactive
3. Without prejudice to any future application or appeal, the applicant is advised that part of reason for refusal 5 could be overcome by entering into a Section 106 Legal Agreement or unilateral undertaking for a scheme that was in all other respects acceptable.

## 1.0 INTRODUCTION

- 1.1 The application site, delineated by the red line boundary, is 12.5ha in size and forms part of the former Reading Golf Club playing course. The application site consists of holes 1 and 18 and part of holes 2, 3, 4 and 17; and facilities including the existing clubhouse; storage; access and car parking. The land ownership of Reading Golf Club in its entirety consists of 42ha of land that spans the administrative boundary between Reading Borough and South Oxfordshire District. The 'redline' boundary of the application site is contained wholly within the Borough of Reading as illustrated on the Site Location Plan below:

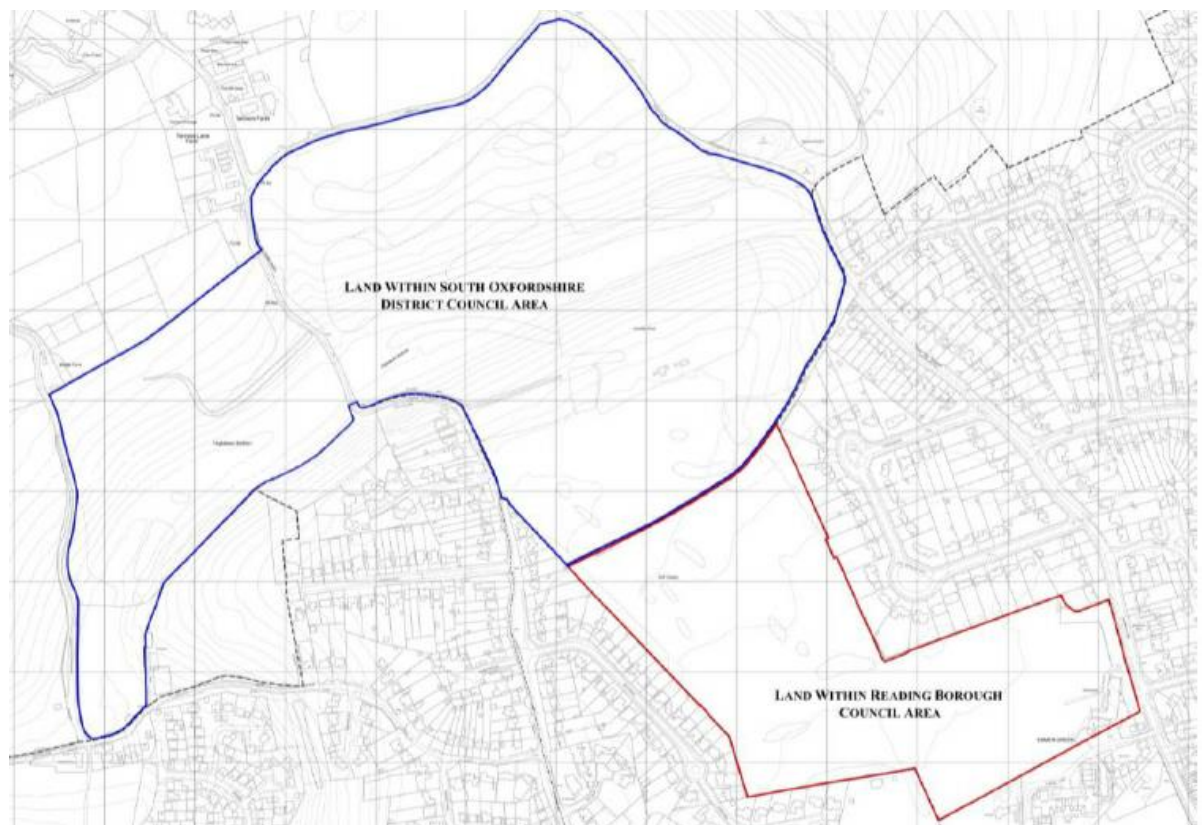


Figure 1 – Indicative boundaries of Local Authority Administrative areas in context of RGC land ownership

- 1.2 The application site is irregular in shape with the site frontage on Kidmore End Road.
- 1.3 The lower southern part of the application site is bounded to the south by the rear boundary line of the playing fields at Emmer Green Primary School; and the road access to Lyfield Court and The Conifers a retirement complex of 2-storey accommodation; and the boundary of a large residential dwelling at The Brindles.
- 1.4 The upper northern part of the application site to the east and west is bounded respectively by the rear gardens of the two storey detached dwellings on Brooklyn Drive; and various styles of dwellings on Gorselands, Eric Avenue and

Highdown Hill Road. Many of these dwelling plots contain gated access directly onto the Golf Course. The surrounding area within Reading Borough has a sylvan, low to medium density, suburban character. The northern alignment of the site has no physical boundary at present as it adjoins the remainder of the playing course located within South Oxfordshire District.

- 1.5 It is noted that Reading Golf Club is no longer operating at the site, however the application site is laid out as a golf course, with records of a Golf Course existing in this location for over 100 years. The application site currently consists of extensive areas of open managed grassland with existing mature trees and hedgerows. Due to the extent of existing trees, of varying categories, the site is subject to an Area Tree Preservation Order (ref Area TPO 4/18) and TPO 96/02 which includes 23 individual trees and 9 groups of trees.
- 1.6 Areas within the site are subject to Reading Borough planning designations as set out on the adopted proposals map as a 'Site for development in Caversham and Emmer Green'; an area of identified biodiversity interest, and existing or proposed Green Link. The site is also located within an Area of Archaeological potential. Within South Oxfordshire District within the Reading Golf Club land ownership is an Area of Ancient Woodland known as 'Cucumber Wood' and the Chilterns Area of Outstanding Natural Beauty (AONB) also lies approximately 1km to the north of the site.
- 1.7 Kidmore End Road is a single carriageway local distributor road operating a speed limit of 30mph. A footway is provided on the western side of Kidmore End Road and is segregated from the main carriageway by means of a 2.5m-wide grass verge.
- 1.8 Emmer Green Local Centre is located within 350m from the site boundary and provides amenities such as a Post Office; Convenience Store; Express Supermarket; Pharmacy and Take-aways, Cafes. Emmer Green Primary School is the closest primary school to the site, located approximately 850m away by foot. The nearest secondary school and sixth form is Highdown School and Sixth Form, this is located 1.1km west of the site, by foot.
- 1.9 Bus stops are located on Kidmore End Road in close proximity to the site access and egress, providing services into Reading Town centre and Reading Train Station (Premier Routes 23 and 24). The station is 3.3km from the site and can be reached in approximately 15-minutes by bicycle. Reading Borough Council (RBC) branded cycle routes R40 and R41 provide a connection to Reading Station and Town Centre.

## 2. PROPOSAL

- 2.1 The proposal has been submitted as an Outline planning application, however the only matter reserved being Appearance. The application was also accompanied by an Environmental Statement.
- 2.2 The following reserved matters are therefore required to be considered and subject to determination within this application:

**Means of access** - the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network

**Landscaping** - the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes:

- a. screening by fences, walls or other means
- b. the planting of trees, hedges, shrubs or grass
- c. the formation of banks, terraces or other earthworks
- d. the laying out or provision of gardens, courts, squares, water features, sculpture or public art and
- e. the provision of other amenity features

**Layout** - the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development

**Scale** - the height, width and length of each building proposed within the development in relation to its surrounding

Site Layout Plan Rev G May 2021



- 2.3 The proposal is for the demolition of the existing one and two storey clubhouse within the site and the erection of up to 257 residential units (C3 use) with public open space and a Health Care Facility. The vehicular access to the site is via Kidmore End Road creating a new primary spine road layout. This creates a direct route into the centre of the site and then a circular road to access the upper part of the site, a section of this road length runs parallel to the northern boundary of the site. Secondary roads and cul de sacs are also created within the site to serve the proposed residential units. A secondary vehicular access is proposed from Kidmore End Road (adjacent to 21 Kidmore End Road) to serve the proposed Health Care Facility/ residential units orientated towards the site frontage.

2.4 The proposed mix of residential accommodation as submitted in May 2021 is set out in the table below. It is noted that the Affordable Housing offer has now been increased to 35%, but no details have been submitted in relation to the what types of houses or tenure they would be.

Size of Unit	Total Number	Market Housing Tenure Split at original 30% offer	Affordable Housing
1 bed flat / Maisonettes	30	21	9
2 bed flat / Maisonettes	26	18	8
2 bed houses	37	25	12
3 bed houses	83	58	25
4 bed houses	81	58	23
<b>Total</b>	<b>257</b>		

2.5 The proposed residential units are predominantly individual dwellings with building heights of 2-storey to eaves level with pitched roofs. “Appearance” has not been applied for but the applicant has indicated that at Appearance Reserved Matters stage some of the roof space can be proposed for additional accommodation. The applicant has provided examples of indicative appearance using a suggested house design with an ‘Arts and Crafts’ movement style. The dwellings have individual gardens, with flatted units specified to have balconies or outdoor amenity space.

Indicative Elevational Treatment illustrated within the submitted in Design Access Statement:





- 2.6 The proposed Health Centre building has a floor area of approximately 600 sqm containing indicatively 5 treatment rooms at ground floor. The 3 storey building also contains 34 flatted units with 2 indicated at ground floor with the remainder at upper floors. The ground floor units can be used as accessible flats as they can provide direct access at street level. This building has associated car parking located to front in the location of the existing car parking that serve the Golf Club and to the side and rear.
- 2.7 In terms of parking for the flats, it is indicated that a maximum of 69 spaces will be provided within communal parking areas to cater for residents of apartments who do not have access to a garage or driveway. Visitor parking has been calculated based on the number of apartments provided within the development only - at a ratio of 1 space per 4 dwellings.
- 2.8 Plot numbers 174 to 185 consist of 6 x 1-bedroom and 6 x 2-bedroom flats. A total of 21 parking spaces has been provided for these plots which complies with the Council's parking standards.
- 2.9 Plot numbers 224 -257 consist of 20 x 1-bedroom and 14 x 2-bedroom flats and are located at the front of site above the Health Care Facility. The health centre has been assumed to have 5 treatment rooms and 10 FTE Staff but the indicative floorplans do not confirm the number of treatment rooms.
- 2.10 A total of 85 parking spaces are provided for the health/medical centre and the residential flats equating to 60 spaces for the flats and 25 spaces for the medical centre which complies with the Council's parking standards. It is stated that there is no further detail at this time regarding the health centre size. However, parking will be provided as per the RBC parking standard requirements when delivered under the reserved matters application.
- 2.11 With regard to cycle parking, a total of 449 cycle spaces will be provided for the dwellings. Cycle parking will be provided for the health centre in line with the standards set out in Revised Parking Standards and Design Based on 5 treatment rooms and 10 FTE staff, this equating to 10 cycle parking spaces.

## Plan: Green Space Provision on Site Rev 04 May 2021



Table of Green Space Provision On Site		
Public Open Space	Equipped / Designated Play Area	0.16ha (plus informal play throughout within parks and gardens)
	Parks and Gardens	1.05ha
	Amenity Green Space	1.03ha
	Natural and Semi-Natural	1.29ha
Public Green Space	SUDS	0.49ha
	Street Planting	0.09ha
Private Green Space	Front Garden	0.54ha
	Rear Garden	2.86ha
<b>Total Green Space</b>		<b>7.51 ha</b>

**LEGEND**

- SITE BOUNDARY
- EQUIPPED PLAY
- PARK AND GARDEN (INCLUDING FORMAL AND INFORMAL PLAY)
- AMENITY GREEN SPACE
- NATURAL AND SEMI-NATURAL OPEN SPACE (WITH INFORMAL PLAY)
- SUDS
- INCIDENTAL AREAS OF GREEN SPACE / PLANTING
- FRONT GARDEN
- REAR GARDEN

- 2.12 The development site also incorporates areas of Green Space as set out in the applicant's table and Green Space Plan set out above. Public Open Space is formed from a single 1.21ha LEAP 'Local Equipped area of Play (LEAP)' and park/garden in the centre of site adjacent (area shown in yellow and pink) near the north eastern boundary; and further 2.32 ha of amenity green space and natural and semi natural open space (areas shown in dark and light green). These



areas a located around the site in linear strips sited adjacent to the central vehicular route through the site or adjacent to the site boundary to the rear of proposed dwellings containing some of the trees to be retained. Further open space (0.58 ha) is in the form of SuDS and incidental areas. Private green space (3.40ha) also provided in front and rear garden areas for the proposed residential units.

The applicant sets out that land use within the site would be as follows:

4.11ha (36%) will be retained as Public Open Space, SuDS or street planting.

3.4ha (30%) will be retained as front or rear garden space.

3.93ha (34%) will be developed in terms of built form and infrastructure.

### Tree Retention, Removal and Proposals Plan' May 2021



- 2.13 The proposals seek the removal of 117 trees or groups of trees (130 trees in total) to allow the construction of dwellings, parking spaces and associated infrastructure. The applicant also proposal new tree planting for (134 new trees). The proposed tree planting is located within the areas of public realm and includes large tree species along the spine road. There is no reliance on planting in rear gardens, but existing trees of significance would be located within proposed rear gardens. Further tree planting off site within South Oxfordshire District is proposed by the planting a new woodland adjacent to Cucumber Wood, which the applicant states will provide indirect benefits to the Borough by planting in this location.
- 2.14 The applicant considers that the development proposals sited within Reading Borough meet the requisite policy requirements of the Reading Borough Local Plan, in particular in relation to Policy EN8. However, the applicant sets out that

an additional 5ha parcel of land within the applicant's ownership to the North of the application site, situated in SODC could additionally be secured within this application to provide benefits to residents of Reading Borough.

- 2.15 The applicant has also submitted a Community Infrastructure Plan which sets out the intended uses for the land within the ownership of Reading Golf Club outside the application site within South Oxfordshire District.

Community Infrastructure Plan Rev H



- 2.16 The land directly adjacent to the application site is illustrated as existing grassland. An area of additional woodland tree planting of circa 1000 trees is shown adjacent to existing Ancient Woodland; and a potential site for 5ha country park and allotments to the north are indicated. The remainder of the land within SODC forms a foot golf, disc golf and a 9-hole short game golf that are now operational as the 'Fairways Family Golf Centre', open 7 days a week. A café and outdoor seating area are also provided. Upgrades to this facility are subject to planning application SODC currently under consideration (ref P21/S2089/FUL).

- 2.17 During the course of the application in response to consultee comments changes have been made to the Masterplan (2054-PL04 Rev G Site Layout) and these as specified by the applicant are:

Access to Emmer Green Primary School omitted  
 Units 52 - 66 reconfigured to infill school access and by reducing the number of houses shown behind Gorselands reduce the pressure on the trees on the common boundary. Units in this area have gardens that are now 4-5 metres longer.  
 Additional area of open space created to the west of Plot 66.  
 Additional area of ecology/bio-diversity added behind Plots 52-59

Additional new tree planting shown - as per Fabrik details  
Two 'push-out' kerb lines incorporated for speed reduction measures  
Additional footpath access off Kidmore End Road shown to connect to the Medical Centre  
Provision of a direct pedestrian link from the bus stop to the health centre  
Build outs along the proposed spine road to reduce traffic speeds

The changes to the masterplan have also necessitated minor alterations to the Landscape DAS Addendum, associated landscape plans, Tree Report and the Landscape and Ecological Management Plan & Biodiversity Impact Calculation.

## 2.18 EIA Matters

The application submission is accompanied by an Environmental Impact Assessment, which is used to assess the likely significant effects of a proposed development upon the environment. The Environmental Statement (ES) is required to provide the LPA with sufficient information about the potential effects of the development prior to a decision being made on the planning application. The information provided as part of the ES has been taken into account in the determination of the application and was consulted on in accordance with Regulations. The submitted additional and amended information (received 27<sup>th</sup> May 2021) on a number of matters but involving only minimal changes to the assessment of significant effects, was subject to publication and re-consultation of relevant consultees and local residents and is considered within the main body of the report.

## 2.19 Submitted numerous drawings and documents:

Plans:

2054-PL01 Location Plan

2054-PL02 Constraints Plan

2054-PL03 Opportunities and Parameters Plan

2054-PL04 Site Layout, Rev G (May 2021)

2054- PL04 Site Layout Rev G (Mau 2021)

2054-PL05 Site Layout Section 1, Rev A

2054-PL06 Site Layout Section 2, Rev A

2054-PL07 Site Layout Section 3, Rev A

2054-PL08 Site Layout - Affordable Units Rev A (May 2021)

2054-PL09 Site Layout - Car Parking Rev A (May 2021)

2054-PL10 Indicative Street Scenes Sheet 1

2054-PL11 Indicative Street Scenes Sheet 2

2054-PL12 Indicative Floor Plans Sheet 1

2054-PL13 Indicative Floor Plans Sheet 2

2054-PL14 Indicative Floor Plans Sheet 3

2054-PL15 Indicative Floor Plans Sheet 4  
2054-PL16 Indicative Floor Plans Sheet 5  
2054-PL17 Indicative Floor Plans Sheet 6  
2054-PL18 Indicative Floor Plans Sheet 7  
2054-PL19 Indicative Floor Plans Sheet 8  
2054-PL20 Indicative Floor Plans Sheet 9  
2054-PL21 Indicative Floor Plans Sheet 10

2054-PL22 Indicative Floor Plans Sheet 11

P19-2877\_01H Community Infrastructure Plan, Rev H

P19-2877\_03 Density Plan

- Landscape and Open Space Plans by fabrik, comprising:

D2743 Reading Golf Club L\_101 Compensatory Tree Planting Plan, Rev 01

D2743 Reading Golf Club L\_102 Green Space Provision, Rev 03

D2743 Reading Golf Club L\_103 Tree Plan, Rev P11 (May 2021)

D2743 Reading Golf Club L\_104 Cross Sections, Rev 03

D2743 Reading Golf Club L\_105 Key Area 1, Rev 03

D2743 Reading Golf Club L\_106 Key Area 2, Rev 03

D2743 Reading Golf Club L\_107 Wider Open Space, Rev 02 (May 2021)

- Tree Constraints and Protection Plans by Arbortrack Systems, comprising:

Tree Protection Plan (Proposed layout + tree data & shadows), Rev G

Tree Protection Plan (Proposed layout + tree data), Rev G

Tree Constraints Plan (Tree survey plan on existing layout), Rev F

Utilities Plans by Temple Group/Ridge and Partners LLP, comprising:

5010065-RDG-XX-ST-PL-ME-9901 - C Services Diagram

2054 Rev G Schedule of accommodation and parameters detail by Paul Hewett Architects (May 2021)

Design and Access Statement by Paul Hewett Architects - as Amended May 2021

Landscape DAS, December 2020 Addendum, by Fabrik - as Amended May 2021

Arboricultural and Planning Integration Report, December 2020 Update, by Arbortrack

Dormouse Survey Report by Ecology Co-op

Energy and Sustainability Strategy by Temple Group/Ridge and Partners LLP

Geophysical Survey Report by Magnitude Surveys

Landscape and Ecological Management Plan & Biodiversity Impact Calculation (LEMP & BIC), by Ecology Co-op Issue 2 (May 2021) and Calculation Tool (May 2021)

Lighting Assessment, December 2020 update, by Stantec

Minerals Resource Assessment by Stantec

Planning Statement, including Affordable Housing Statement and CIL/S106 Obligations Statement, by Pegasus Group

Soils Survey Report and Figures by Temple Group/Reading Agricultural Consultants

Statement of Community Involvement by Cumpsty Communications

Superfast Broadband Strategy Statement, December 2020 Update, by Stantec

Topographical Survey by MAP

**Environmental Impact Assessment**, by Temple Group with consultant input from Fabrik, Stantec, Archaeology South East and the Ecology Co-op, comprising:

Statement of Environmental Impact Assessment Conformity, December 2020

Volume 1 Non-Technical Summary (NTS) Summary of the ES in nontechnical language.

Volume 2 Main Text

1. Introduction
2. The Site Description of the Site and its surrounding environs
3. EIA Methodology Methods used to prepare each chapter (including limitations), description of ES structure and content, generic significance criteria, scoping and consultation.
4. Alternatives Considered and Design Iterations Description of the main alternatives considered.
5. The Proposed Development and Construction Overview Description of the Proposed Development and details of the construction.
6. Socio-Economic Assessment of effects on social factors, housing and recreational facilities.
7. Air Quality Assessment of air quality effects, December 2020 update.
8. Traffic and Transport Assessment of traffic and transport effects, December 2020 update.
9. Noise and Vibration Assessment of noise and vibration effects.
10. Water Resources, Drainage and Flood Risk Assessment of effects on water quality, including effects relating to drainage and flood risk.
11. Ecology Assessment of ecological effects.
12. Archaeology and Built Heritage Assessment of effects on local archaeology and built heritage.

13. Climate Change and Greenhouse Gas Emissions Assessment on the effect on global climate change and greenhouse gas emissions.
14. Effect Interactions Assessment of potential for both intra (Type 1) and inter (Type 2) cumulative effects.
15. Residual Effects and Conclusions Summary of the conclusions of the technical chapters of the ES (including Residual and Cumulative Effects).

Volume 3 Landscape and Visual Impact Assessment (LVIA) of effects on landscape and views.

Volume 3 LVIA Addendum, December 2020

Volume 4 ES Technical Appendices Supporting Assessments, Data, figures and photographs to support of Volume 2.

Technical Appendices:

A: Consultation A1: Scoping Report A2: Scoping Opinion

B: Traffic Assessment

C: Noise and Vibration Impact Assessment

D: Water and Flood Risk D1: Flood Risk Assessment (FRA) D2: Outline Drainage Strategy (SuDS) D3: Utilities Strategy

E: Air Quality

F: Phase 1 Ground Contamination Survey

G: Ecology G1: Ecological Impact Assessment (EclA) G2: Preliminary Ecological Assessment (PEA)

H: Archaeology and Built Heritage H1: Archaeology Desk Based Assessment (Heritage Statement)

I: Climate Change

Technical Note No 5500/TN008 dated 19th March 2021.

**Further Information received 27<sup>th</sup> May 2021** - Amended plans referenced above

Response to Minerals Resource Assessment May 2021

D2743 Landscape DAS Addendum revised -Part 1

D2743 Landscape DAS Addendum revised -Part 2

D2743 Reading Golf Club LVIA Revised

Response to Transport Officer comments

Response to Tree Officer comments Reading golf Club Tree Report Part 1,2 and 3

Compliance Check List re Reading Borough Local Plan Policies

**Briefing Note issued to LPA on behalf of the developer :**

- Dated 24<sup>th</sup> June 2021 received 24/6/2021

- Dated 2<sup>nd</sup> July 2021 received 5/7/2021 to include Counsels Legal Opinion re the interpretation of Local Plan Policy EN8
- Further Legal Opinion received re the interpretation of Local Plan Policy EN8 received 6/7/2021

### 3. RELEVANT PLANNING HISTORY

#### 3.1 Application site

161871 : Re-pollard 2 lime trees (T1 and T2). Permitted 11th October 2016.

181992 : Cut back one oak overhanging 3 Gorselands from the Golf Course to give 6.5m clearance from property. Permitted 9th January 2019.

200229 : Request for an EIA Scoping Opinion in accordance with Regulation 15 (2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) with regard to the proposed development at Reading Golf Course to develop a scheme for a mixed-use residential led development to incorporate up to 275 new homes; medical space; associated open space and landscaping; vehicle parking, pedestrian, cycle and vehicular accesses, associated highway works; and associated infrastructure. Advice from RBC Officers and statutory consultees provided between April and May 2020 due to National Lockdown 1.

200713: Outline planning application, with matters reserved in respect of Appearance, for demolition of the existing clubhouse and the erection of a new residential-led scheme (C3 use to include affordable housing) and the provision of community infrastructure at Reading Golf Club. This scheme was based on a development of 260 dwellings.  
Withdrawn on 25<sup>th</sup> November 2020.

This proposal was considered by officers to result in the loss of Undesignated Open Space leading to an unnecessary urbanising effect. This was in relation to on-site concerns in relation to means of access, over-engineered roadways, trip analysis, parking provision; the proposed layout resulting in unacceptable proximity of proposed built form to existing protected trees; and the extent of future landscaping/ other measures to secure a green link and biodiversity enhancements or suitable deliverable mitigation via S106.

Pre application discussion were undertaken with the LPA between 2019 and 2020 and a previous development layout was considered by the South East Design Panel in March 2020 (report issued 17/4/2020).

Final pre-application advice was issued in May 2020 which outlined similar concerns as those set out above.

No further pre-application advice was undertaken between the application being withdrawn in November 2020 and the scheme resubmitted in January 2021 which reduced the number of units by from 260 to 257.

#### 3.2 Development within South Oxfordshire District:

Land within Reading Golf Club:

P21/S2089/FUL: Replacement of existing halfway hut with proposed family golf centre building and associated landscaping.  
Kidmore End Road, Chalkhouse Green, Kidmore End, RG4 8SQ  
Under consideration at the time of writing.

- 3.3 Land at Caversham Heath Golf Club:  
P20/S1340/FUL Amendments to existing golf course to create new 18th green and practice putting green.  
Permitted 16<sup>th</sup> July 2020

P20/S1619/FUL  
Extension to existing clubhouse and minor amendments to existing vehicular access (as amended to reduce size of gables and extent of glazing).  
Permitted 23<sup>rd</sup> November 2020

#### 4. CONSULTATIONS

- 4.1 The final comments received from consultees in relation to the latest submissions by the applicant are summarised below. Where relevant or where they are the only comments received, comments made on the original submission are referenced.

##### **Statutory**

**Department for Communities and Local Government 'Planning Case unit':**  
Acknowledge receipt of the environmental statement relating to the above proposal.

- 4.2 **Environment Agency:** No objection.

Issued advice to local planning authority: Continued dialogue between the developer and Thames Water re Foul Sewage and Utilities' is essential to ensure any upgrades of the existing network to accommodate the new connection are in place before occupation of the development.

There is a private abstraction point (for the golf club) in the area of the new development this would be made unusable by this development. The permit would be void as the golf course will have no right of way for abstraction and a new licence would need to be applied for. Documents indicate that the abstraction will be obsolete due to the golf club closure.

- 4.3 **Natural England:** No objection  
Based on the plans submitted and mitigation proposed, Natural England has no objection to the proposed development. We do not consider that the proposed development would compromise the purposes of designation or special qualities of the AONB. We would advise that the proposal is determined in line with relevant NPPF and development plan policies, landscape and visual impacts are minimised as far as possible and landscape advice is obtained from the AONB Partnership or Conservation Board.  
Further general advice on the consideration of protected species and other natural environment issues was also provided as an Annex.



#### 4.4 **SUDS:** No objection

The submitted documentation provides an overview of the proposed drainage strategy for the site which would be developed further should permission be granted. At this stage the applicant is only required to demonstrate that the proposal will reduce surface water run-off from the site, and I am happy that the proposal does provide for this.

It is however noted that the drainage strategy includes exceedance routes which at Figure 7.3 illustrates to be along the northern and eastern boundaries of the site, this would need to be addressed further at the detailed design stage to ensure that the proposal complies with the following.

S9 The design of the site must ensure that, so far as is reasonably practicable, flows resulting from rainfall in excess of a 1 in 100 year rainfall event are managed in exceedance routes that minimise the risks to people and property.

Regardless this would not be sufficient to refuse the application and the overall principle is to reduce surface water run off which is accepted and therefore I am happy that the proposal is acceptable subject to conditions.

### **Non Statutory**

#### **External**

#### 4.5 **Berkshire Archaeology:** No objection subject to conditions.

There are some potential archaeological issues with this application, as previously noted for the site, because of its location within an area of identified archaeological potential. The applicant has supplied a desk-based assessment, which notes the potential for archaeological remains dating to the prehistoric and Roman periods, as well as some possibility for later features. A geophysical survey has also been carried out on the site, and whilst this did not identify any specific significant features, the report did not rule out the presence of more ephemeral archaeological deposits. The assessment concludes that, given the anticipated impact of redevelopment on the survival of archaeological assets, a programme of archaeological works should be required, to mitigate the effects of the proposals, in line with national and local planning policy.

#### 4.6 **Chilterns Conservation Board :** Conclude that that the application site here falls broadly within the wider setting of the AONB and sits next to or just beyond a wider valued landscape, itself a part of the setting and contained within the National Character Area 110 and with a landscape character that shares much with the South Oxfordshire LCA Chilterns Plateau with Valleys. In this respect, the CCB has concluded that there is little impact on the immediate setting of the AONB boundary, as exists. We would recommend that the status of the wider valued landscape is given weight in any planning decision and that a landscape masterplan and management plan protects and indeed enhances the relationship between the existing site edge and the wider landscape. The CCB accepts that a direct visual impact upon the setting of the existing boundary would be assessed as minimal. The valued landscape status and the potential for an AONB boundary review are matters of relevance and some weight can be attributed. Set against these material considerations CCB promotes a sympathetic boundary treatment towards the northern section of this site.

#### 4.7 **Reading Design Review Panel**

**Site:** The uniformity of the layout was considered to be problematic, leading to repetitious groupings of buildings all across the site without any hierarchy or variation. The adoption of a graded density approach was recommended with higher densities towards Kidmore End Road and reduced densities towards the proposed country park. The residential use of the enlarged site area was considered to be appropriate. Whilst the strategic landscape ideas are drawn clearly they have been eroded in the layout plans by excessive road infrastructure and poor quality communal spaces, defined mainly by back garden fences.

Despite being an outline application, there should be a robust spatial strategy for the site to define legibility and character areas including the relationships of building height to street width/type, public realm to front gardens.

**Building:** The indicative design of the dwellings was considered to ignore criteria of low energy, carbon neutral and contemporary design issues. There was little attention played to orientation of the individual dwellings with repetitive units shown in all orientations throughout the site. The scale and size of the buildings was considered to be appropriate, There is no suggestion that the proposed houses would be adaptable to future requirements.

**Sustainability:** There was no recognition of passive solar design, energy efficiency, adaption to changing needs of family, or how more imaginative housing options might exploit the varied needs of the future residents. There appeared to be no consideration of the wider issues of the natural environment of the site and it's biodiversity. No evidence of the necessity to reduce car dependence in the layout which replicates excessive attention to car ownership at the expense of the natural environment. How the scheme addresses issues of sustainable design and carbon/energy/circular construction initiatives.

**Design approach:** There is a clear necessity to reduce car dependence, the use of low impact energy materials construction and design, the inclusion of housing options other than family houses of varying size, incorporation of communal workspace, new communal travel infrastructure thereby avoiding/reducing congestion on the southern section of Kidmore End Road and it's junction with Peppard Road.

**Further comment :** How can such a magnificent situation and location provoke more than this bare minimum of responses?

The current scheme has low quality design of areas of the 'natural and semi natural open space (with informal play)' bordered by roads and around back gardens with little surveillance and outlook.

#### 4.8 **Forestry Commission:** As a Non Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather we are including information on the potential impact that the proposed development would have on the ancient woodland.

One of the most important features of Ancient woodlands is the quality and inherent biodiversity of the soil; they being relatively undisturbed physically or chemically. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

4.9 **Historic England:** Not wish to comment.

4.10 **Oxfordshire County Council** - County responsibilities as Highways Authority, Education Authority and Lead Local Flood Authority. We consider that there should be discussion with officers at South Oxfordshire District Council in respect of any legal agreements pertaining to the land in South Oxfordshire prior to bringing this application to the relevant Planning Committee.

Transport Development Control: No objection subject to conditions. Further detailed comments supplied.

Flood Authority: Surface Water Drainage Management Strategy must be aligned with OCC Local Standards. Sought submission of SUDS proforma.

*Applicant considers this can be dealt with by condition.*

Education: No objection. The proposed development lies within the designated area of Maiden Erlegh Chiltern Edge (secondary) School and adjoins the designated area of Kidmore End CE Primary School, both of which are located in Oxfordshire. It lies closer to a number of schools within Reading Borough Council, and it would be expected that families would seek places at these schools rather than Oxfordshire schools. Reading Borough Council should, therefore, ensure that sufficient school places are available for the resulting additional population.

4.11 **South Oxfordshire District Council** - confirmed given the existing lawful use of the land as a golf course that the continuation of outdoor recreational use of the land for the purposes of a shorter form of golf, foot golf or disc golf would not require planning permission. The car park referred to by the 7th hole is existing and capable of use in connection with the continued leisure use of the land. However, the car park is small and does not provide space for many vehicles and is accessed close to the junction of Tanners Lane and Kidmore End Lane. Both are narrow country lanes and in my view are unsuitable for any significant increase in traffic associated with the use of the land although the ability to control such vehicle activity is limited if there is no associated change of use of the land or related operational development requiring planning permission. However, the intended use of the car park and poor highway access would be a significant constraint to potential plans to intensify the outdoor leisure use of the land in the future in relation to both highway safety and convenience and the qualities of the surrounding rural landscape.

Para. 6.19 of the Planning Statement states:

*The use of this land (within SODC) is necessary to pay for its long-term upkeep and maintenance and so it is considered that there is a credible plan in place for this land.*

Again if any long term plan requires an intensification of the land with associated visitor facilities in the form of reception areas, additional parking areas, refreshments etc there are considerable constraints including tree preservation orders, ancient woodland, a local wildlife site, priority habitat areas and

conservation target areas as well as the setting of the Chilterns AONB. I consider that an indicative layout for this land along with details of the routes and construction of any hard surfaced pathways should be provided. This would enable us to ascertain whether there is a requirement for any planning permission, and to inform the proposals for the community use of this open land the site should be subject to an ecological appraisal to identify the ecological constraints and opportunities present. Areas which support protected species or priority habitats should be retained and enhanced. There should be no operational development such as hard surfaced paths within 15-20 metres of the ancient woodland edge as a minimum, but siting these works further away than this would be preferred. Additional footfall and increased public access within the ancient woodland should be prevented as this can have significant adverse impacts on the biodiversity value of the woodland. It is recommended that native edge planting, and potentially discrete fencing, is used to discourage public access to the woodland. These matters should ideally be considered in relation to the current application and are particularly relevant in the event of entertaining the suggestion under Para. 6.20 of the Planning Statement, which states:

*In terms of the 4.4ha of which has been identified to provide parkland, allotments, cycle/walkways and tree planting for the benefit of the residential scheme, it is entirely possible to attach pre-commencement conditions to require implementation of these requirements prior to works commencing on the residential part of the site. The exact timing of such implementation conditions can be agreed as part of negotiations with the Council. Whilst the SODC land would not be within the control of the Council, the residential development would and therefore there would be adequate, enforceable legal control in place to cover this part of the requirements.*

The application site is approximately 1km from the edge of the Chilterns AONB and the closest part of the existing golf course to the AONB is less than 500m away. As such there should be sufficient regard to the setting of the AONB, and the views out from the site towards the AONB, along with the experience of the users of both existing and proposed public rights of way between the edge of the urban area and the AONB. As the application site is contiguous with the part of the course within South Oxfordshire, I consider that very careful attention should be paid to the northern edge of the site to ensure integration into the open landscape as it extends towards the Chilterns AONB. In this regard I have some concern about the lack of a suitable landscape buffer between the proposed main road running along much of the northern boundary of the site, and the site's boundary. Generally, the housing development on the edge of Reading has a much softer landscaped edge to the open land within South Oxfordshire. The proximity of the main road to the boundary also gives rise to potential landscape and ecological issues regarding light and noise pollution towards the open land. I would also raise/reiterate the further issues below:

- The road network in South Oxfordshire in this area is a network of single track lanes with passing places and is not suitable for a significant increase in traffic.
- The character of the land beyond CA1b is semi-rural, blending into the rural landscape of South Oxfordshire. The proposals go well beyond this strong edge to Reading up to a non-existent physical boundary with no provision to contain the development along that boundary.
- The use of the recreational land within SODC would have to be managed into the long term. Imposing the long-term maintenance cost of a complex landscape and leisure facility of this scale on the 257 new houses could be extremely onerous with the lack of public ownership/management. There is no guarantee

that any development required to increase the financial viability of the use of the land would be acceptable to SODC, particularly having regard to the significant landscape, ecological and highway constraints.

- The emerging Kidmore End NDP has a number of policies/objectives that are relevant to this area of the district which includes the identification of the SODC land as a local valued landscape, and objectives to protect the quiet nature and highway safety of the rural lanes.

#### 4.12 **Sport England** - Supports the application

The proposal will result in the loss of the 18-hole golf club, which is why Sport England is responding. The main difference between the previous scheme (200713) and this scheme is the introduction of a 9-hole golf course which includes footgolf, disc golf and normal golf.

The loss of the 18-hole golf course was supported by England Golf, (EG) who are the country's golf authority. During the ongoing discussions the mitigation of the loss was key as we were concerned that there could be a run on golf courses in the area. However, EG were convinced that the financial sustainability of the nearby golf clubs would be in a better position by the demise of Reading Golf Club, at least for the foreseeable future.

Sport England's Active Design was also discussed for incorporation in the overall development in order to create a healthier and more sustainable development.

#### **Assessment against Sport England's Objectives and the NPPF**

The scheme on the site of the golf course is broken into two elements: housing (subject of this planning application) and a country park. The housing of approximately 257 homes is at the south end of the site and has followed a number of the Active Design principles. I welcome the walking and cycling drawings to show how the site fits into the wider networks. I also note in the transport assessment the links to and from the site by public transport.

The applicants are willing to contribute to a cycle hire scheme (para 9.80 in the planning statement), which is to be welcomed.

The proposed country park where informal activity can take place is to be welcomed. It would not be unreasonable to suggest that the country park will attract more activity from local people than the golf course.

I have consulted England Golf formally on this new planning application and they responded on the 22<sup>nd</sup> February 2021 saying:

*There is no change in the position of England Golf from that provided on 10th December 2019 and 19th August 2020: "England Golf are supportive of the club and its plans to relocate and, in turn, develop a more comprehensive golfing offer at Caversham Heath Golf Club".*

The investment into Caversham Golf Club is as follows:

- Creation of better facilities at the club house through an extension and remodelling;
- creation of a new practise putting green;
- remodelling of the existing course including levelling, new bunkers and realignment of the 18<sup>th</sup> hole;
- a new golf sixes/academy course.

NB these works are subject to a separate planning application.

The introduction of a family golf centre (paragraph 10.8) on the north of the site is welcomed and will allow an introduction to the game for families.

Contributions to a much needed 3G Artificial Grass Pitch (AGP) (Para 9.137 in the planning statement) would be welcomed by Football Association and could attract funding from the Football Foundation if it was allocated to one their priority sites identified in the Local Facility Football Plan.

**Conclusion:** Sport England considers that the application is consistent with the following policy objective: Enhance.

#### 4.13 **Thames Valley Police - Crime Prevention Design Advisor**

The health facility /flatted blocks: The lobbies should be large enough to a secure lobby and postal services, be bright and welcoming to residents and guests; and provide direct access to the inner lobby and lift, segregating lift core from private residential corridors one solution could be to relocate the entrance lobby to the current location of the bike store. Buildings should meet 'Secure by Design Standards'.

Defensible space /Natural surveillance: From the plans provided , the majority of dwelling have been setback from the street, However I note that set back (defensible space) has not be afforded to all (for example plots 16 to 21 ; plots 206 to 208). Setback of a dwelling from the access pedestrian footpath has a significant impact on perceived lack of residential privacy, if the set back or defensible space is insufficient residents may feel vulnerable to casual visual intrusion and simply close their blinds or curtain, reducing surveillance opportunity over their parking spaces. Generally, setbacks should be 1.5 - 2 metres in depth with appropriate boundary (identifying ownership). This should be seen as a minimum to ensure that residents are offered appropriate levels of privacy and that windows do not open up over footpaths. Where there are no footpaths (i.e. level surface streets) setbacks should be a minimum of 2 metres.

Surveillance over Public Amenity space and LEAP: I ask that the landscaping scheme ensure that natural surveillance throughout the development and to/from dwellings and LEAP is not compromised. As trees mature they may impinge upon this. Tree positions and final growth height/spread along with a clear stem/trunk and a managed lower canopy height should be considered to avoid this. The LEAP requires careful design in relation to equipment selection, (lighting?), and landscaping. The design should promote the ownership and enjoyment of all users as well as child safety and should also deter criminal and antisocial behaviour.

Boundary treatment: Detailed plans come forward, these should include detailed boundary treatment plans, it is strongly recommended that private rear gardens fencing be close board fencing 1.8m in height. Careful consideration will be needed on the type of boundary treatments used to secure the rear gardens of the dwellings backing on to the edge of the development or green Amenity space (for example plots 53 and 54; plots 153 to 149; plots 173 to 186). Additional planting in these areas is not sufficient and residential materials used must be robust and suitable in the environment

#### 4.14 **Thames Water**

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development does not materially affect the sewer network and as such we have no objection.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority.

With the information provided, Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water request that the following condition be added to any planning permission. “No development shall be occupied until confirmation has been provided that either:- 1. Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water.”

#### Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied.

The proposed development is located within 15m of our underground water assets and this should be addressed by way of an informative.

#### Internal

#### 4.15 Ecology - Consultant Ecologist

The ecological survey work undertaken to inform the application (as reported in the EIA and Volume 4 Appendix G of the EIA) has in general (excluding the Biodiversity Impact Assessment - see below) been undertaken to an appropriate standard. It shows that:

1. The buildings within the application site are unlikely to support roosting bats and although some trees have the potential to host a bat roost these will largely be retained and surveys to determine if any do host a bat roost can be undertaken prior to the trees being felled as the status of any roosts within them (if there are any) will be likely to have changed prior to works commencing on site.

2. Bat activity on the site was limited and mainly from common and widespread species. There were a few recordings of rarer species including Nathusius Pipistrelle, Barbastelle and bats from the genus Myotis (some of which are uncommon) but the number of recordings of these species was low and as bats

can have a large range it is unlikely that the site is of importance for the rarer species. Any impact on this group of species can be reduced by ensuring that a wildlife friendly lighting scheme is provided and an indicative plan showing “no light zones” has been provided within Figure 10 of the most recent ecology report (24 May 2021).

3. No badger setts were recorded within the red line boundary. It is possible that badgers will open up new setts prior to the start of works. If they did these would need to be excluded under licence from Natural England. In the long term (post development) badgers would be able to continue to forage within the gardens and open space within and adjacent to the site.

4. The site is unlikely to be used by reptiles or significant numbers of amphibians. The accidental killing or injury during construction of these animals could be controlled via the implementation of precautionary working practices.

5. The site is unlikely to be used by dormice.

6. Breeding bird surveys recorded 4 Birds Of Conservation Concern (BOCC) Red List species (House Sparrow, Song Thrush and Mistle Thrush, Starling) and five BOCC Amber list species (Bullfinch, Dunnock, Lesser Black Backed Gull, Black Headed Gull and Mallard) within the application site. Of these: House Sparrow, Song Thrush and Mistle Thrush, Starling, Bullfinch, Dunnock and Mallard; have or might breed within the application site. It is likely that they will be able to continue to do so post development because, with the exception of Bullfinch, these species are often found in urban areas. Furthermore, the applicant is proposing to install integral bird boxes and plant new wildlife friendly landscaping within the scheme. Any direct impact on nesting birds can be mitigated by carrying out removal of hedgerows etc., outside of the bird nesting season.

7. The site may be used by hedgehogs. However as many of the boundary features are being retained and enhanced and as long as hedgehog friendly fencing is installed any adverse impact upon this species is likely to be minimal.

In summary then, subject to conditions to minimise any adverse impact on wildlife during construction and to ensure that the development includes wildlife friendly landscaping and ecological enhancements, then there is no reason not to approve this application in terms of the impact on protected or priority species.

#### **Habitat assessment and biodiversity impact assessment calculation**

The development will result in the conversion of an area of golf course (that has been “improved” through the addition of fertiliser and grass seeds and managed in an intensive manner) to housing, gardens and public open space. The plans (according to the most recent submissions) include 7.51 ha. of on-site green space, some of which will be planted as species rich or wet grassland.

An updated document named “Landscape and Ecological Management Plan & Biodiversity Impact Calculation” dated 24 May 2021 has been produced. This shows the habitat areas that have been included in the calculations post development. The applicant’s ecologists has also provided a DEFRA 2 Biodiversity Impact Assessment Calculator (BIAC) excel spreadsheet for the scheme.



The 24 May document and spreadsheet conclude that the proposals will result in a net loss of Habitat Units [Habitat Units are a factor of habitat type, condition, distinctiveness, size (area), ease of creation etc.] on site but to offset this an area of grassland to the north of the site (in the former golf course) will be enhanced by managing it so it becomes species rich grassland. Areas of mixed scrub will also be planted in this area (see Figure 8 of the 24 May ecology report).

They also conclude that the development will result in a net gain in Hedgerow Units although there is no map showing where the existing hedgerows referred to in their calculator are or how they have reached the conclusion that the hedgerows are in the conditions that they are.

An outline of the ecologist's calculations in relation to Habitat Units is given below:

- The baseline is that there are 31.88 Habitat Units on site (within the red lime boundary) pre-development
- After development, on site, there will be 27.05 Habitat Units
- This will result in a net loss of 4.83 Habitat Units on site.
- The offsite habitat baseline (i.e. the areas of improved grassland) is 3.88 Habitat Units
- After these areas have been enhanced they will be worth 12.51 Habitat Units, i.e. an increase of 8.63 Habitat Units
- This is a net increase in habitat units of 3.8 Habitat Units (8.63 - 4.83 - shown in the calculator to two decimal points 3.79).
- This equates to an increase in Habitat Units of 11.89%

My advice is that this is an inaccurate assessment of the likely Habitat Units that will be delivered for the following reasons:

1) The area that has been used in the calculator is incorrect. The area of the site, i.e. within the red line boundary is according to the ES [section 5.2.5] 12.15 hectares whereas the BIA has a figure of 11.38 (my measurement using Ordnance Survey Mastermap data is 12.11 hectares).

2) The quantity of woodland pre-development is less than that which actually exists. This appears to be because they have mis-measured the areas of trees on the site (which they have concluded fit the Integrated Habitat System [IHS] category of "Young Trees Planted") and because they haven't included the strips of woodland around the edge of the site particularly the strip of woodland south of Eric Avenue.

It is not clear where their measurements have come from: the 24 May report has a phase 1 map which does not show the true extent of tree cover and in any case has an incorrect red line boundary, nor differentiate between semi improved and amenity grasslands. Without a map (as we asked for before) clearly showing where the habitats used in the baseline assessment are and their extent it is not possible to assess the accuracy of the calculator.

3) There is no justification for the habitat condition assessment that they have used pre-development.

4) They have not used a connectivity or strategic significance multiplier. This should have been used as the site is on a green link and therefore also within an area formally identified in local strategy.

5) The habitat areas post development do not match those given in their recent submissions (below), i.e. 7.51 ha of green space (in the recent submissions) vs 6.57 retained or created green space in the calculator.

I have roughly digitised the extent of tree cover based on the tree survey and aerial photos and my calculation shows that the pre-development baseline is in the region of 67 Habitat Units. As such to deliver a net gain it is likely that a larger amount of off site habitat enhancements (probably twice as much or more) would need to be provided. However, given that the applicant could use the golf course to the north for this it is quite likely to be achievable.

The applicant's recent letter at paragraphs 49 and 50 reads:

*"49. We have proposed three solutions for the proposed off-site biodiversity provision, either:*

- A commensurate financial contribution is paid to RBC via the S106.*

*or*

- It is delivered on land within RBC's control. This approach is as set out in our earlier January 2021 LEMP and BIC submission.*

*or*

- It is delivered on neighbouring land within the Golf Club's control in SODC. The Council's BAP identifies that it is acceptable to provide offset within adjacent authorities, with SODC being one of those named. This approach is as set out in our latest May 2021 LEMP and BIC submission.*

*50. It is notable that the above net gain calculation does not take into account any biodiversity value gained by the planting of 1,000 trees."*

In relation to bullet points 1 and 2 above. As far as I am aware there has been no discussions with the council about where these units would be delivered, and the "January 2021 LEMP and BIC submission" does not give any confidence that these units could be delivered on council owned land.

Regarding bullet point 3 it may well be that a net gain in Biodiversity Units can be achieved within the golf course. However, it is likely that significantly more grassland (at least twice as much) than is currently proposed would need to be enhanced to achieve these units.

Regarding paragraph 50 I believe the 1000 trees are to be planted in SODC (are these not the areas shown as scrub on the 24 May Figure 8 plan?). However, assuming these will be planted as a single block, saplings at 2m spacings (which is a common density for woodland planting - they are later thinned) equates to an area of woodland 50 x 50m or 0.025ha. which will not make any significant contribution to offsetting the Habitat Units that will be lost on site.

4.16 **Education** - to be updated at your meeting.

4.17 **Environmental Protection**

#### Air Quality

An air quality assessment has been completed by Temple as part of the Environmental Statement and submitted on behalf of the developers.

Construction & Demolition Phase: The assessment follows IAQM guidance coming to an overall assessment of 'not significant' for dust emissions from the development with mitigation in place. This assessment of the impact is completely reliant on there being suitable mitigation in place. It is therefore essential that the developers ensure appropriate mitigation of dust is implemented at all times.

It is therefore recommended that a condition is attached to the permission requiring that a dust management plan is drawn up and implemented to include all the measures listed in point 7.7.2 of the Air Quality assessment.

Operational Phase: The impact of traffic on Air Quality from the development during the operational phase was found overall to be ‘not significant’.

However there was found to be 1% increases of NO<sub>2</sub> at 9 of the receptors modelled and 2% increases at 2 receptors. The impact at one receptor on Prospect Street was classed as ‘slight adverse’.

Council Policy EN15 requires development to have regard for Air Quality and mitigate any detrimental effect on it. Although there is only a small impact on Air Quality, it is a measurable detrimental impact, which should be mitigated. A suggestion made in the air quality assessment (7.7.1) is for the developer to provide a contribution to introduce a smarter signal operating scheme at the Henley Road/Prospect Street/Peppard Road junction with the aim of improving the traffic flow thereby improving Air Quality. It is recommended that this suggestion is implemented as mitigation for the effect on air quality around this location.

Noise

Noise & Vibration during the construction and demolition phase will have an adverse impact on the nearest noise sensitive receptors, even with mitigation in place. This has been assessed as a minor to moderate adverse effect with mitigation in place.

It would be necessary for the developer to follow Best Practicable Means to minimise the impact during construction & demolition. A condition C2 has been recommended below, to ensure that the specific measures to be implemented are submitted and approved prior to works commencing.

For the operational phase, the assessment indicates that a good internal noise environment can be achieved using appropriate glazing and sound insulation for walls and ventilation.

Table 9.16 of the noise and vibration assessment shows recommended operational noise limit ratings for plant installed at the site. All plant must adhere to these rating levels.

*Table 9.16 Recommended Operational Noise Limit Rating Levels*

Receptor	Day (07:00-23:00)		Night (23:00-07:00)	
	Lowest Typical Background noise level, LA90 dB	Operational Noise Limit Specific Sound Level dB	Lowest Typical Background noise level, LA90 dB	Operational Noise Limit Specific Sound Level dB
All Receptors	41	31	32	22

Contaminated Land

The developer is responsible for ensuring that development is safe and suitable for use for the intended purpose or can be made so by remedial action.

The phase 1 desk study submitted with the application has identified potential pollution linkages. It recommends that confirmatory samples are collected from the soils underlying the site in the areas of the groundkeeper's sheds, waste oil container, and former chalk quarry.

Landfills have also been identified to the North of the site, therefore a gas monitoring programme is required.

Investigation must be carried out by a suitably qualified person to ensure that the site is suitable for the proposed use or can be made so by remedial action.

Conditions have been recommended to ensure that future occupants are not put at undue risk from contamination.

#### Construction and demolition phases

We have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses).

Assessments have been completed and submitted for noise and air quality which indicate their impact during construction and demolition can be mitigated to within acceptable levels. The developers must submit specific details of the measures that will be implemented to control these in line with the recommendations made in the submitted assessments.

Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability.

- 4.18 **Housing:** Final: The offer for 35% on site (90 units) with a size mix of the properties to match that of the wider scheme is a fair and welcome contribution to the available Affordable Housing in the town. The affordable homes are pepper potted throughout the scheme which will support the objective of integrated communities.

This application should offer a policy compliant 70/30 split between Social Rent and intermediate/ low cost home ownership. This would be a welcome move towards genuinely affordable (social rent) rented properties and matches the clear need for such properties in the town.

#### 4.19 **Hampshire County Council Minerals:**

Conclusions: Section 4.1 of the MRA states that *'It should be noted that the information available from IDOM (2019) is insufficient to complete a detailed assessment of the Mineral Reserve present within the Site. Additional more detailed Site investigation and analysis would be required to better define any Mineral Reserve'*, while the report goes on to state that Stantec believe they have adequately assessed the mineral potential of the site in the context of RMLP Policy 2. It is our opinion that the MRA does not sufficiently consider the policies set out in the emerging Joint Central and Eastern Berkshire Minerals and Waste Plan and as such further information is required to satisfy the safeguarding policies of this Plan.

In line with the emerging JCEB Minerals and Waste Plan, the MRA should consider the safeguarded Lambeth Group deposits, however, it fails to do so. Further information is required on the viability of and operator interest in the clay deposits of the Lambeth Group before the safeguarding policies of the JCEB Minerals and Waste Plan are complied with.

We believe that the estimated sand and gravel tonnage provided by Stantec is not supported by sufficient evidence, therefore further investigation and laboratory testing is required into the geological status of the mineral deposits before the viability of the resource can be fully determined. Consultation with local mineral operators is also required to fully explore the options available to the developer.

*Officer note: Additional information has been submitted to address the above concerns see consideration section below.*

**4.20 Conservation & Urban Design Officer :** The site does not have a direct impact on two significant heritage buildings at Old Grove Farm and Barn, Surley Row, set 200m from the site, due to the distance and screening from the existing residential development.

**4.21 Leisure:** In respect of the ‘Matters for Consideration’ document dated 24<sup>th</sup> June 2021 officers are not convinced that the on-site open space provision provides adequate communal leisure space for the residents of the new development. Moreover, in an area recognised as being deficient in recreational public open space, it is Council policy to seek new, legible, accessible public open space for the neighbourhood. Burying this within a development does not make it an obvious destination for people from the surrounding communities, and there is insufficient activity of interest to attract people in. The off-site contribution, to which we agree, offsets the first of these issues (insufficient on-site provision), but we disagree that the schemes adherence to EN8 is satisfied as stated: ‘replacement space that is more accessible to both adjacent landowners and the neighbouring locality’.

The site is not permeable to neighbourhoods on both sides. There are two reasons why this is desirable. The first is the creation of wildlife corridors across the site. The second is the potential to overlap this with several designated footpaths that allow pedestrian links between the Eric Avenue (and Bugs Bottom) neighbourhoods and the Kidmore End Road community, as well as north-south links, providing access to the countryside. The development of the golf course amounts, in effect, to the loss of a very large wildlife corridor, and cross-site routes would provide some mitigation, particularly if the major vegetation features are part of this. This would also be an important leisure gain that could be secured from this development, recognising the historic desire for this informal use of the golf course site. In our view, the opportunity to use the existing green infrastructure to enhance the green network has not been a driver in the design process.

We disagree with the claim that the proposals at RGC will result in more on-site, higher value trees, a net biodiversity gain, accessible POS and a LAP being provided. There will inevitably be fewer trees high value trees on site; the proposals have an adverse effect on both total tree cover and, by and large, on retained trees. We do not understand how there will be a net biodiversity gain.

We note later on in the document that there is a list of the absolute gains in habitat diversity proposed, but there is no calculation of losses, so it is not clear how the net gains are calculated.

I have an underlying unease about the LVIA, that such a large, tree-ed green space could be totally invisible and, conversely, that a new housing development would be similarly invisible, which is what, in effect, the assessment concludes. In particular, I am concerned about the visual effect on the Kidmore End Road frontage and views into the site from this location.

#### 4.22 Natural Environment Trees -

Initial comments: 11.3.2021

Soil (and implications on retained and new trees): Officers are seeking to avoid potential tree related subsidence claims in the future and the related felling or substantial reduction of large trees. It is confirmed that clay soils exist and as such buildings should be kept outside the potential zone of influence of existing and new trees, especially those high water demand species known to be implicated in subsidence claims.

Trees: The AIA confirms: *There are 320 surveyed trees or groups of trees on or near the site. Of these, 11 are 'A' (high quality) category, i.e. 31, 53, 60-62, 160a, 208, 262, 265, 268 & G294. These are native oak species (Q. robur or petraea) with two native Scots pine (262 & 265). 119 trees or groups of trees are 'B' (moderate quality) category, 174 trees or groups of trees are 'C' (low quality) category, and 16 trees are 'U' (unsuitable for retention quality) category, i.e. 22, 23, 46, 68, 115, 116, 135, 197, 229, 275, 276, 282, 298, 305, 316 & 318.*

*The outline proposals require the removal of 109 trees or groups of trees (122 trees in total) to allow the construction of dwellings, parking spaces and associated infrastructure. Of these, 21 trees are 'B' (moderate quality) category, i.e. 9, 37, 38, 95, 96, G138 (8 in group), G165 (3 in group), 175, 181, 190, 201 & 253. The remainder are 'C' (low quality) category (90) or 'U'(unsuitable for retention quality) category (11).*

The following concerns re:

- Dominance of trees in gardens to some plots, e.g. plots 161-164 and shading pressure on others, e.g. plots 1, 21-24, 49, 78 & 84, both issues for plots 8-15, 59-66. Plots 8-15 includes Limes 102 103 & 315 to the south (hence shading) at current heights of 16, 16 & 19 metres respectively - I can give examples in the borough of where such close proximity has resulted in regular complaints and pressure to prune.
- 284 Sycamore -I note the report states that there is an intention to retain this in the attenuation feature with the levels unchanged. No clarity is provided on how this can be done.

#### Landscaping

The LS DAS December 2020 Addendum (LS DAS Add) explains how the landscape strategy has been amended to address concerns raised in my memo of 21/09/20 re application 200713.

With reference to the Tree Planting Plan Rev P10, the species and diversity are acceptable and the planting includes large canopy trees and evergreens - principles are as requested. I note the stock size proposed, which again is acceptable as per the LS DAS Add. The planting notes are generally acceptable although the British Standards referred to are outdated. BS4034:1989 has been withdrawn and BS3882 should be 2015 not 2007. It is appropriate not to refer to BS8545:2014 'Trees: from nursery to independence in the landscape. Recommendations'. In addition, as previously advised, a biosecurity statement should be provided in relation to the suppliers to be used - the intention to do this is confirmed in the LS DAS Add.

The LS DAS Add further states: *Furthermore, an area to the west of Cucumber Wood, to the north of the site in the wider golf course, has been identified as a receptor site for the creation of a new woodland area as compensation for the tree removals proposed within the Site. This area will accommodate approximately 1000 trees, whilst also providing strengthening of and extension to the existing woodland.*

Whilst I appreciate that 1000 trees are intended for Cucumber woods, these are in the SODC area hence do not address our policies or canopy cover targets for the RBC area. In addition, although it is not stated, I would assume these 1000 'trees' will be small whips. Their environmental benefit will be limited for many years and it is extremely likely that, as with most whip planting, a significant portion will not establish and survive or remain long term to become nature trees.

I note that in relation to quantity of tree planting, the LS DAS Add supports the out-of-Borough planting as part of the overall strategy and in relation to my concerns that long-term there will not remain as 1000 'trees', it confirms my point by stating: *'As with any planting, there will be some losses and over time the woodland would need to be selectively thinned to ensure the even development of the tree canopy'*.

#### Climate Change

I note reference to Tree Planting and Removal in 13.8.6-13.6.8. It notes that *'The replacement of mature trees with younger specimens is likely to marginally reduce the carbon sequestration from photosynthetic processes, as well as produce substantial quantities of wood and other vegetation (for which the end uses are not yet known), leading to a shorter term increase in carbon emissions during this stage'* and that (in relation to mitigation) *the Applicant is committing to planting approximately 1,000 new native trees at Cucumber Wood to the north of the Site early in the programme, to help to offset this and lead to a longer-term net reduction in carbon from trees.*

These 1000 'trees' are outside the Borough so strictly speaking should not be counted.

#### **Final Comments:**

Soil - satisfactory information provided, can be dealt with by condition

#### Trees

In relation to the Arb Report:

This states that *the revised outline proposals are for 257 units and that the outline proposals require the removal of 117 trees or groups of trees (130 trees in total) to allow the construction of dwellings, parking spaces and associated infrastructure. It further states that the extensive new planting proposed (134 new trees) provides good mitigation at a better than 1:1 planting ratio. This is a net gain of four trees, less than the six on the previous layout (within the*

borough). It is worth noting that since the production of the report, two trees have failed (the southern Oak in G294 and one Lime - T16 I think) - both require a replacement under the TPO. 6.3 mentions the intended 1000 trees in the SODC area on which I commented previously.

6.2 confirms, in relation to works within RPAs, that: *New hard standing (a proposed footpath) within the root protection area (RPA) of trees 147, 148, 149, 150 & 164 will be constructed to a 'No Dig' specification, as indicated on the plan at Appendix A. See section 8.4 & Appendix E. If existing hard standing within the RPAs of trees 2-5, 8, 12-15 & 17-20 is replaced, it can either be to a 'No Dig' specification as indicated on the plan at Appendix A, or existing surfaces can be replaced if the depth of the existing sub-base is not exceeded.* This is acceptable in principle - details to be secured.

6.5 details how the design has been adjusted to respond to the concerns within my memo of 11 March. In relation to those points in 6.5, I have the following comments:

- Oaks 208 & 268 are mentioned but no concerns were raised by me in relation to these, but I note that these are identified on the Zones of Influence tree plan as requiring engineer designed foundations for adjacent houses, which is reiterated in 8.3 of the report. Removal of Ash 181 previously agreed.
- Plots 52-66 - Previously I raised concern over shading of plots 59-66 (now 62-66) in that respect there is no change - the shading pattern shown on the Tree Protection Plan supports this concern. Comment on the change in the area rear of previous plots 54-56 (now 52-59) is given above.
- It is stated that: *The revised layout retains the relationship between retained trees & built form, specifically with regard to plot 98 (tree 211), trees to the rear of plots 114-119 (trees 278 & 279) & plots 78-84 (trees 142, 143 & 182-184* I previously expressed concern about the relationship between particular dwellings and existing trees, as follows: *'Dominance of trees in gardens to some plots, e.g. plots 161-164 and shading pressure on others, e.g. plots 1, 21-24, 49, 78 & 84, both issues for plots 8-15, 59-66. Plots 8-15 includes Limes 102 103 & 315 to the south (hence shading) at current heights of 16, 16 & 19 metres respectively - I can give examples in the borough of where such close proximity has resulted in regular complaints and pressure to prune'*. The arb reports do not comment on all of these and as the design remains the same for these, my concerns remain (see below for plots 161-164).
- I note the Zones of Influence (ZOI) plotted on the ZOI plan, which are helpful. It is stated in the report that: *By our initial estimate 6 dwellings and or garages will require engineer designed foundations and 87 plots and or garages will require deeper foundations - as per NHBC 4.2 guidance. Full details can be provided at the full application stage or via the discharge of an appropriate condition.* This approach is fine in principle but as previously mentioned, this may have an implication on the cost of the development which I assume the applicant has accepted.
- Sycamore 284 - I previously requested clarity on how this could be retained within the attenuation feature without ground levels changing. No clarity on this has been provided; just a reiteration that this is the intention. It is difficult to see how an attenuation basin could be created without dropping levels.



- In relation to the concerns expressed over the dominance of retained tree over plots 161-164, the arb report state: *Trees 295, 299, 300 & 304 are all low quality and are now shown for removal to allay concerns regarding their dominance over plots 161-164. Additional new planting elsewhere on the site ensures that new planting is offered on a better than 1:1 ratio.* The principle of removing trees to address my concern is highly questionable, however, the quality of trees can be considered 'on balance'. These are a 'C' category Hawthorn, two 'C' category Birch and a 'C' category Hazel, the removal of which could be accepted subject to replacement planting. The four account for an additional 4 trees to be removed on top of the original 122, totalling 126 - another four (to total the new 130) remain unaccounted for in this specific section of the report - clarification is required (or of the other 5 if there are 131 trees to be removed - see below). It should also be noted that a 1:1 ratio does not result in a net gain and is lower than the 1:3 the Council aim for on its own land (ref Tree Strategy).

7.1 relates to post-development pressure and states: *The orientation of the retained trees to the proposed outline development is acceptable and the scope for unacceptable post-development pressure is low. The proposed revised outline layout is unlikely to oblige RBC to give consent to inappropriate tree works.* I don't agree with this in relation to shading, an indicated of which can be seen on the Tree Protection Plan and it should be remembered that the shade arcs are based on the current height of the trees, which have the capacity to get taller where not mature. Specific concern in relation to shading would be to plots 1, 8-15, 21-24, 78, 84, 62-66. As stated in my previous comments: *Plots 8-15 includes Limes 102 103 & 315 to the south (hence shading) at current heights of 16, 16 & 19 metres respectively - I can give examples in the borough of where such close proximity has resulted in regular complaints and pressure to prune.*

An AMS will need to be secured for the final design which should take account of a phased approach to the development if this is adopted.

#### Landscaping

With reference to the Tree Planting Plan Rev P11, the British Standard references have been updated as requested and notes on biosecurity added. In relation to the 'tree aftercare & pruning' notes, I don't see the appropriateness of the recommendation for canopy pruning given that root balled trees are proposed and nursery production should have ensured an appropriate root system to the size of tree. Formative pruning in the early years should be the only pruning required.

As previously stated,: *I note that some proposed trees will result in shading of properties in the future. The orientation of rooms will need to be carefully considered to ensure that principle rooms are not shaded.*

*The Planting Plan helpfully plots the zones of influence of proposed trees. It is noted that the majority minimise potential conflicts (subsidence) with new dwellings, however there are a few locations where this is not avoided hence, as with existing trees, foundation type will need careful consideration.*

As mentioned above, 130 trees are to be removed and 134 planted giving a (reduced) net gain of 4 within the borough boundary. This is disappointing on a large site such as this to only gain 4 trees.

#### Landscape Visual Assessment

With reference to the Environmental Statement Volume 3: Landscape and Visual Impact Assessment - Addendum, this states (1.2.2) that 131 trees are to be removed and 134 planted - this is not the same number of removals as stated in

the arb report - documents should be consistent. If 131 is correct, then the net gain is reduced further to 3.

With reference to the DESIGN AND ACCESS STATEMENT - LANDSCAPE CHAPTER MAY 2021 ADDENDUM REVISED VERSION, I have been through the 'response to consultation comments' table. In relation to the net gain (this also states 131 trees to be removed), I have no additional comments to make over and above those in my memo of 11/03/21 and brief comment above.

I note the comments on species, but this has already been accepted. Concerns regarding foundations have been addressed in principle (details to be secured). In relation to SUDs and landscaping, as indicated, a combination of the two could be explored in the final design stage (it is possible) to add natural play. The applicant could also look at incorporating tree planting within the SUDs design to add further tree planting - tree pits can be designed to act as attenuation features.

In conclusion, the design has improved in various revisions but does not address all tree concerns, particularly those of shading hence future pressure to prune or fell. In addition, the net gain of 3-4 trees (within the borough boundary) is poor but I will leave you to consider further the net gain provided if taking in adjacent SODC land into account, in order to decide 'on balance' if this is acceptable - it may be possible (as mentioned above) to reconsider the SUDs design so that it incorporates tree planting to provide an improved net gain. A few points of clarity are required as detailed above.

In terms of formal objection to the proposal, i.e. points on which a reason for refusal could reasonably be based, this would relate to 1) future pressure to prune or fell and 2) insufficient net gain in tree number (if not resolved).

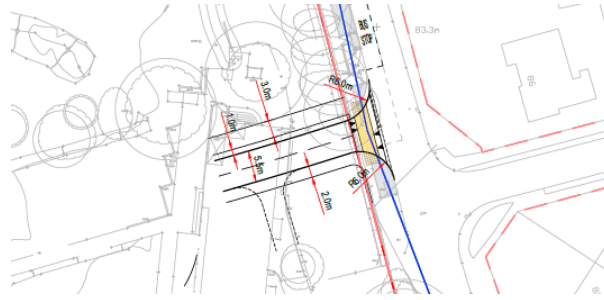
#### 4.23 Transport

Final comments :

As the site is situated on one of the Borough's Local Transport Corridors classified as the C107, all proposals should comply with Reading Borough Council's Design Guidance for Residential Accesses on to Classified Roads to ensure that the safety and efficiency of the classified road network is maintained and enhanced by the design for access to new development. Therefore, the proposed access modifications are assessed with particular care to ensure good design standards are achieved, especially with the respect to layout and visibility.

The primary vehicular access serving the residential accommodation will be located on the eastern boundary of the site from Kidmore End Road, in a similar location to where the existing car park access to the Golf Club is located. The main all modes access design can be seen on **Drawing 45675/5510/001** (Image below). The existing northbound bus stop located on Kidmore End Road has been relocated north to accommodate the proposed site access.

**READING GOLF CLUB SITE ACCESS LAYOUT - PRIMARY ACCESS**



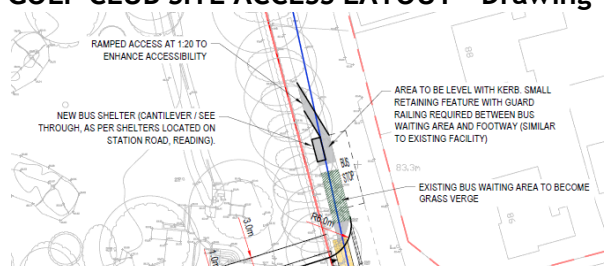
Given the proposed number of units, Reading Borough Council’s Design Guidance states that the residential access should be provided to a width of 5.5m for a distance of 50m with a junction radius of 6m. The vehicle tracking provided within the Transport Assessment (TA) indicates that the access can accommodate both a refuse vehicle and rigid trunk entering and leaving the site. It is noted that the refuse vehicle/rigid truck will overrun the centre line, however, the access design includes measures to improve pedestrian priority and reduce speeds into the site.

In accordance with the Council’s Design Guidance, visibility requirements for new junctions onto classified road are 2.4m x 70m for local transport corridors. Visibility splays have been demonstrated on **Drawing 45675/5510/001**. In terms of design, the layout of the primary access serving the residential accommodation is acceptable and complies with adopted policy.

It is stated (para 4.2.10) that Reading Buses are supportive of the principle of development as it offers to increase local bus Patronage as the current bus stops could serve both the residential development and health facility without amending the current service. Reading Buses do not favour the option to bring the current services into the site using the internal loop road as short extensions offline can lead to impact on frequency, journey time and passenger experience. Therefore, existing bus stops on Kidmore End Road would be utilised until such time further development comes forward and the re-routing of services can be determined.

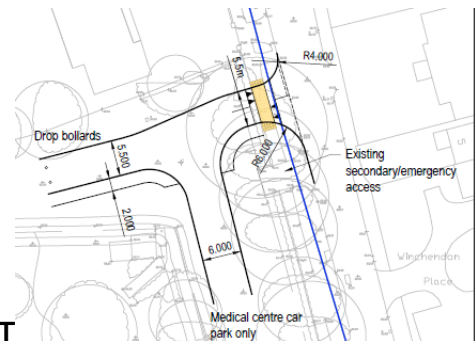
The existing northbound stop will need to be modified as it lies between the new site access to the south and the new GP Surgery to the north. A concept layout for an improved bus stop design with shelter and levelled access can be seen in Drawing 45675/5510/001A. The concept layout includes a ramped access from the northern approach, however, the applicant should investigate whether steps or a ramp could also be accommodated the southern approach as currently provided. It is proposed that the detail design of the bus stop is secured via condition prior to commencement which is acceptable to the Highway Authority.

**READING GOLF CLUB SITE ACCESS LAYOUT - Drawing 45675/5510/001A REV A**



A secondary access will be located on the eastern boundary of the site providing access only to the health centre and apartments above it. It is noted that this access has been retained (currently providing emergency access for Reading Golf Club), however it has been slightly relocated and improved to include a footway and informal crossing with tactile paving.

The secondary access junction allows direct access to the health facility and reduces the impact of additional trips by all modes entering and exiting the residential development via the main access junction. This access will also form an emergency access with a droppable bollard into the site. The junction design can be seen in **Drawing 45675/5510/003**.



#### READING GOLF CLUB SECONDARY ACCESS LAYOUT

Given that the access is retained and does not form a new access onto a classified road, I have no grounds to object to the provision of a secondary access.

Tracking diagrams have been submitted to demonstrate a refuse vehicle and 10m long rigid vehicle entering the site requiring the full width of the access road to enter and turn within the site. TRICs data indicates that the health centre could generate in the region of 0.5 - 2 OGV trips per day. However, in order to ensure that deliveries are appropriately managed, a Delivery and Servicing Plan is required detailing how vehicles will access the development without creating safety concerns and congestions within the parking areas. This is to be covered by condition if the application is approved.

There is a large area of land to the north of the development site within South Oxfordshire administrative area which forms part of the existing golf club, but it is outside of the red line area. Currently, there is a lane that runs from the existing clubhouse car park in Kidmore End Road alongside the rear gardens of the existing houses on Brooklyn Drive which accesses the land within SODC.

The applicant's Transport consultants have confirmed that there is no vehicle access to this land from the development site and the internal track will be removed as per the proposed site layout. Land to the north of the development site within South Oxfordshire administrative area will be accessed via Tanners Lane.

A Community Infrastructure Plan is included in Appendix K, illustrating a range of land uses within the SODC land including country park, leisure uses (9 hole golf/footgolf course), allotments and a proposed clubhouse/café. It should be noted that the housing development effectively removes access and parking currently associated with the leisure use of the land. Therefore, all the traffic

associated with the reduced leisure offering will be directed to the road network in South Oxfordshire.

It is indicated that the retained golf use will utilise the existing access close to the junction of Tanners Lane and Kidmore End Lane and the current car park by the 7th hole, using a booking slot basis for games. Whilst SODC has determined that planning permission is not required for such activities, they have noted that the car park is small and does not provide space for many vehicles. Tanners Lane and Kidmore End Lane are both narrow country lanes and unsuitable for any significant increase in traffic associated with the use of the land. The intended use of the car park and poor highway access would be a significant constraint to potential plans to intensify the outdoor leisure use of the land in the future. It is noted that a planning application has been submitted to SODC for a proposed family golf centre building which will be assessed and determined separately to this planning application.

### ***Pedestrian & Cycling Access***

Policy CC6 of the Local Plan relates to accessibility and intensity of development.

The site is located in an existing residential area with a well-connected network of streets with footways and footpaths providing access to local facilities. However, the width of the footpath on Kidmore End Road narrows down to a width of 1m (approx.) outside the White Horse pub which is not ideal for people with mobility impairments traveling between the application site and the pedestrian crossing facilities on Peppard Road.

To improve pedestrian facilities in the local area, a raised informal crossing, comprising a flat-top speed hump with a Duratherm herringbone imprint, is proposed on Kidmore End Road, Lyefield Court at its junction with Kidmore End Road, and on Grove Road at its junction with Kidmore End Road. The alternative route avoids the narrowing, taking people to the other side of Kidmore End Road where the footpath is wider.

Pedestrian and cycle access into the residential development will be facilitated from the main site access on Kidmore End Road and the secondary access to the Health Centre. Footways and cycle routes are proposed within the development for greater permeability within the site through landscaped areas between properties. Pedestrian links from the main access road to the Health Centre and from the bus stop (on Kidmore End Road) to the Health Centre have been provided and are shown on the updated masterplan.

The Institute of Highways and Transportation's (IHT's) guidance, Guidelines for Providing for Journeys on Foot (2000) asserts that the pedestrian routes should be designed so that the walking distance along the footpath system to the bus stops should not be more than 400m from the furthest houses (approx. 5 min walk). Whilst it is desirable to provide bus stops within 400m, it is recognized that people are prepared to walk much further. In relation to travel to public transport, the WYG document 'How far do people Walk?' identifies greater distances of 800m as acceptable distances to bus services which equates to approx. 10 min walk.

Paragraph 4.2.3 states that a link into Emmer Green Primary School could be provided. However, the applicant has confirmed that this is only an aspiration for the masterplan and needs agreement with the school which has not been

ascertained. As such, the link has been removed from the latest site layout plan. The alternative route to the school is via the main access, Kidmore End Road and Grove Road which is a significantly longer walking distance.

The Transport Assessment states that pedestrian and cycle links can be extended from the northern end of the site, connecting to the traffic free cycle route NCN 5 to the north, as shown in Figure 6.1 within the Transport Assessment. These do not form part of this application (redline area) but would provide enhanced accessibility to/from the site for pedestrians and cyclists. Planning permission is not required to implement the foot/cycle paths on private land. The applicant has agreed to the provision of pedestrian and cycle links prior to commencement of development and will accept a planning condition to satisfactorily control this matter to deliver a foot/cycle route from the northern edge of the proposed development to NCN5. Details of the construction of any hard-surfaced pathways should be conditioned to ensure they are suitable for users including pedestrians, cyclists and disabled users.

### ***Public Transport***

The bus services within Caversham are constantly under review given the lower mode share towards bus use and higher dependency on the private car. COVID 19 has complicated matters in terms of predicting travel patterns and behaviours but it is evident that the proposal will generate increased demand for bus use and therefore to support the increased bus use a contribution should be provided equating to £50,000 a year for the duration of the build for a minimum of 3 years and a maximum of 5 years.

### ***Internal Layout***

Manual for Streets (MfS) is expected to be used predominantly for the design, construction, adoption and maintenance of new residential streets. The internal roads should be designed to provide a network of connective routes to a maximum design speed of 20mph.

The internal layout includes a 5.5m wide spine road, looping at the northern end with footways on either side. The street is designed to meander through the development and not have excessive sections of straight road. There are several junctions, building frontage, driveways and foot/cycleways along the side of the carriageway.

Long, straight streets with good forward visibility can lead to higher speeds, therefore, one way working / give-way build outs are indicatively shown on the updated masterplan (Appendix A) as further traffic calming features. The build outs are distanced greater than 70m apart as they will work in conjunction with the meandering street, junctions and driveways/frontage to slow traffic. They have been placed between junctions, and driveways at suitable locations and achieve 20mph MfS forward visibility. Full details will be designed through Reserved Matters which is acceptable to the Highway Authority.

Shared use streets which serve more than one property are acceptable, but the length and number of properties served from each shared surface should be kept to a minimum. A footway is provided on at least one side of all roads within the development that serve more than 6 plots.

The Transport Assessment states that the development will be designed to accommodate appropriate vehicles used for servicing and deliveries. Full details should be submitted as apart of future reserved matters applications.

**Parking & Cycle Parking** The site is located within Zone 3, Secondary Core Area, of the Council’s adopted Parking Standards and Design SPD. Typically these areas are within 400m of a Reading Buses high frequency ‘Premier Route’, which provides high quality bus routes to and from Reading town centre and other local centre facilities. In accordance with the adopted SPD, the development would be required to provide;

- 1.5 spaces per 1 or 2 bedroom unit
- 2 spaces per 3 bedroom unit
- 2 spaces per 4 bedroom unit
- 1 space per 4 dwellings for visitor parking (Flats only)
- 3 spaces per consulting room + 1 per FTE staff for D1 Healthcare Centre

The proposed schedule of accommodation is as follows;

Table 4.1: Indicative Development Schedule

Unit Type	Number of Units
1 Bedroom Apartment	26
2 Bedroom Apartment	20
1 Bedroom Maisonette	6
2 Bedroom Maisonette	6
2 Bedroom House	40
3 Bedroom House	78
4 Bedroom House	81
<b>Total</b>	<b>257</b>

Healthcare	Size (sqm)
Health Centre	600 sqm

Policy TR5 of the Local Plan states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. It is important that enough parking is provided so that there is not a knock-on effect on the safety and function of the highway through on-street parking.

The development comprises predominantly three and four bedroom houses with garage and/or driveway parking. In order to comply with the Council’s adopted Parking Standards and Design SPD, the internal dimensions of a single garages must comply to 7000mm long x 3000mm wide to allow easy access to/from the vehicle and sufficient storage to the rear to accommodate a bicycle. Garages not complying to the standard dimension cannot be counted in the overall parking provision for the development.

The applicant has confirmed that the garages will comply to the dimension of 7000mm long x 3000mm wide. Manual for Streets states that garages are not always used for car parking, and this can create additional demand for on-street

parking. Research shows that in some developments, less than half the garages are used for parking cars, and that many are used primarily as storage. Therefore, the garages should be conditioned to be retained for vehicle parking only to ensure that they are not converted to living accommodation under permitted development rights.

In terms of parking for the flats, it is indicated that a maximum of 69 spaces will be provided within communal parking areas to cater for residents of apartments who do not have access to a garage or driveway. Visitor parking has been calculated based on the number of apartments provided within the development only at a ratio of 1 space per 4 dwellings.

Plot numbers 174 to 185 consist of 6 x 1-bedroom and 6 x 2-bedroom flats. A total of 21 parking spaces has been provided for these plots which complies with the Council's parking standards.

Plot numbers 224 -257 consist of 20 x 1-bedroom and 14 x 2-bedroom flats and are located at the front of site above the health/medical centre. For the purpose of this TA, the health centre has been assumed to have 5 treatment rooms and 10 FTE Staff but the indicative floorplans do not confirm the number of treatment rooms.

A total of 85 parking spaces are provided for the health/medical centre and the residential flats equating to 60 spaces for the flats and 25 spaces for the medical centre which complies with the Council's parking standards. It is stated that there is no further detail at this time regarding the health centre size. However, parking will be provided as per the RBC parking standard requirements when delivered under the reserved matters application.

Accessible parking will also be provided in line with RBC's parking standards (5% of the total parking capacity). Accessible parking provision typically excludes residential developments, and therefore the number of spaces has been calculated based upon the number of spaces required for apartments and for the health centre. Based upon the above information, a minimum of 5 of the parking spaces for the apartments will be accessible spaces and 2 for the health centre.

The Council's Local Transport Plan 3 Strategy 2011 - 2026 includes policies for investing in new infrastructure to improve connections throughout and beyond Reading which include a network of publicly available Electric Vehicle (EV) charging points to encourage and enable low carbon or low energy travel choices for private and public transport. Policy TR5 of the Local Plan also states that development should make the following provision for electric vehicle charging points:

- *All new houses with dedicated off-street parking should provide charging points;*
- *Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.*

Based upon the guidelines set out in the Local Plan, the development will provide an active charging point for electric vehicles at all houses that have dedicated off-street parking. 8no. active charging points will be located within communal parking areas for the apartments and 3no. active charging points will be provided for the health centre parking. This would be secured through condition.



The Transport Assessment (para 4.4.11) states that the site will provide for a car club vehicle. Confirmation from local car club providers Co-Wheels will determine the demand for new car club spaces in this area. This will be determined through reserved matters applications but at least one space will be provided. A plan should be submitted prior to commencement illustrating where the car club space will be sited within the development.

Regardless of this the proposal is required to secure the provision of a car club for a period of 5 years.

Cycle parking should be provided in line with Council's adopted Parking Standards and Design SPD Section 5. The SPD notes 0.5 cycle spaces is required for 1 or 2 bedroom flat, 1 space is required for 1 bedroom dwellings and 2 spaces are required for 2+ bedroom houses.

The two blocks of flats are provided with internal cycle stores on the ground floor of the buildings. Cycle parking for the houses will be provided within garages. It is stated that dedicated secure cycle parking will be provided when a secure internal facility cannot be provided. The details will be secured by condition.

### ***Person Trip Analysis***

The Trip Rate Information Computer System (TRICS) database has been used to calculate the proposed trip rate and subsequent trip generation for the proposed residential development. TRICS survey data is used to analyse individual or selected sets of survey counts to produce trip rate information based on user-defined development scenarios. The results provide an estimate of the likely activity at a development, and it is widely used by both transport planning consultants and local authorities. The TRICS outputs are included in Appendix E of the Transport Assessment.

It is noted that many factors influence mode share, such as walking and cycling infrastructure, public transport provision and distance to railway stations; and that mode shares vary for each site. However, TRICS enables users to select appropriate criteria and ranges in order to achieve robust and reliable trip rates. The system enables the user to filter the database to provide a representative sample.

A complex methodology has been used to derive the trip demands and patterns for the total residential person trips (obtained from TRICS) which is outlined in Section 5 of the Transport Assessment.

The trip demands and patterns for the total residential person trips have been considered by trip purpose, based on the Department for Transport (DfT) National Travel Survey (NTS). The National Travel Survey (NTS) is a household survey designed to monitor long-term trends in personal travel providing data on personal travel patterns. However, this data relates to residents of England as a whole and does not specifically relate to the region nor does it provide a representative sample of the area surrounding the development site. The applicant's Transport Consultants contend that use of National Travel Survey data to determine trip purpose is a standard approach widely accepted for Transport Assessments. It is stated that following trip categorisation by trip purpose, localised data has been used to determine trip distribution and mode share to reflect local travel patterns.

Although this is a complex assessment and the Highway Authority do not agree with all of the assumptions made within the Transport Assessment in particular relating to trips associated with school travel the comparison TRICS vehicle trip data has been reviewed and this represents a similar outcome than that presented. It should be stated that the PM peak has in fact been assessed more robustly as part of the applicant's assessment than would be the case if TRICS data had been used in isolation.

Given the above the Highway Authority are happy that the vehicle trips identified by the applicant are a robust assessment of the proposed development.

### ***Highway Impact***

To establish the existing traffic flows within the vicinity of the application site the applicant has stated that surveys were undertaken by '*means of a manual classified traffic counts (MCTCs) carried out at six locations on Tuesday 25th June 2019 and automatic traffic counts (ATCs) carried out at 13 locations around the Site from Saturday 22nd to Friday 28th June 2019 inclusive.*'

The automatic traffic counts (ATCs) were not initially provided alongside the planning application but have been provided as part of Technical Note 5500/TN010 dated 19/05/21. This identifies that the survey data throughout the week is relatively consistent and does not substantially differ from day to day.

The Highway Authority are aware that residents have identified road works that took place at the time of the traffic counts and have advised that these would have affected the results of the survey undertaken. It is noted that the road works took place between 26<sup>th</sup> June 2019 and Monday 1<sup>st</sup> July 2019. However, it has now been clarified by the applicant that the junctions were assessed utilizing the manual classified traffic counts which took place on 25<sup>th</sup> June 2019 which would be prior to any road works taking place.

As stated above the ATC survey data does not fundamentally change during the assessment period either before or after the installation of the roadworks and the MTC surveys have been assessed against the ATC data and have identified that they are comparable against one another. It should be stated that in some cases the MTC data does represent an increased traffic flow and therefore the assessment of the development is robust.

The Highway Authority therefore have no planning grounds to dispute the survey results undertaken by the applicant as they comply with the DfT standards for traffic surveys.

It is acknowledged that the residents have provided photographic evidence of queues along Peppard Road but having reviewed those provided they are not for the Peak travel periods of the days and also they have been taken within the months were DfT would advise that surveys should not be undertaken as the results would not provide a reliable result i.e. in holiday seasons.

Vehicle trips attributed to the development have been assigned to the local highway network using CUBE software opposed to distributing traffic via existing

turning count data. The resulting AM and PM peak hour development traffic assignment plots are included in Appendix H.

The study area for the development, scoped with RBC, includes the following junctions:

- Golf Course Access / Kidmore End Road / Chalgrove Way;
- Grove Road / Kidmore End Road;
- Kidmore End Road / Peppard Road;
- Buckingham Drive / Peppard Road mini roundabout;
- Peppard Road / Kiln Road / Caversham Park Road; and
- Peppard Road / Prospect Street / Henley Road / Westfield Road.

In respect of the Kidmore End Road and Peppard Road priority junction, the results demonstrate that the junction currently operates efficiently, and that traffic generated by the proposed development causes minimal delay to traffic and can be accommodated at the junction in its current form of a priority T-junction.

Despite the capacity assessment predicting that the current design can accommodate traffic generated by the development, a mini roundabout arrangement has been designed to help better manage traffic flows and aid vehicles exiting from Kidmore End Road. However, the junction assessment clearly demonstrates that the roundabout will result in increased queues and delay along Peppard Road above that of the current road layout. This includes the southbound queues along Peppard Road starting to approach the theoretical capacity for the junction whereas the existing T-junction design has no capacity issues on any of the approaches. The Highway Authority therefore cannot agree to any alterations to the junctions that would increase queues within the vicinity of the site.

The applicant is therefore happy for the proposal for the roundabout to be removed and have therefore put forward a revised layout, drawing 45675/5510/006, and this is deemed acceptable by the Highway Authority.

The capacity impacts of the Peppard Road / Prospect Street / Henley Road / Westfield Road signalised control junction indicate that the junction currently operates above the maximum theoretical operating capacity and the impact of development traffic at the junction will worsen this. The development will also result in additional pedestrian and cycle trips through the junction and therefore in conjunction to the MOVA improvements pedestrian and cycle facilities should be incorporated within the junction improvements.

The developer has stated that they will provide a contribution to RBC to introduce a smarter signal operating scheme such as MOVA to increase capacity at the junction. However, it is likely that the junction would require some significant upgrading of the equipment (not just installing the MOVA kit and some additional loops) and specialist setup of MOVA. Therefore, the contributions would need to fully cover the totality of this work in order to accommodate the additional flows.

To facilitate the appropriate changes to the junction a contribution of £50,000 is required to mitigate the impact at the junction.

For the purposes of the assessment, the Peppard Road / Kiln Road priority junction and the Kiln Road / Caversham Park Road priority junction have been linked and assessed together due to the interaction between the two junctions because of their close proximity and this is deemed acceptable.

Lane based models for the AM and PM peak hours have been created in Junctions 9 in order to effectively assess the operation of both priority junctions in terms of blocking back between junctions.

It was previously identified during the withdrawn application that the proposed impact at the Peppard Road / Kiln Road / Caversham Park Road junction has not been assessed / presented accurately. This has now been addressed by way of updated junction assessment data that corresponds with Table 7.6 within the Transport Assessment and the Highway Authority are therefore happy with the data presented. For reference Table 7.6 can be found below:

Table 7.6: Peppard Road / Kiln Road / Caversham Park Road Junction Assessment Results

	AM Peak Hour 0800 - 0900		PM Peak Hour 1700 - 1800	
	Queue (Veh)	Delay (s)	Queue (Veh)	Delay (s)
2019 Base Year				
Peppard Road (N)	0.1	0.59	0.0	0.08
Kiln Road	2.5	26.08	1.4	16.72
Peppard Road (S)	0.9	5.40	0.5	2.57
Kiln Road (N)	0.3	8.19	0.0	0.98
Caversham Park Road	16.7	178.67	1.0	13.63
Kiln Road (S)	0.9	7.22	0.7	7.17
2026 Future Year				
Peppard Road (N)	0.1	0.78	0.0	0.08
Kiln Road	2.6	28.28	1.8	18.29
Peppard Road (S)	1.3	7.39	0.4	2.54
Kiln Road (N)	0.3	10.27	0.1	1.56
Caversham Park Road	30.7	330.26	1.9	24.74
Kiln Road (S)	1.0	7.53	0.7	7.20
2026 Future Year + Development				
Peppard Road (N)	0.2	0.83	0.0	0.17
Kiln Road	2.6	28.29	1.9	18.21
Peppard Road (S)	1.8	8.39	0.6	2.81
Kiln Road (N)	0.4	10.44	0.1	1.95
Caversham Park Road	35.5	389.78	2.4	24.77
Kiln Road (S)	1.2	7.56	0.9	7.24

The Table above confirms that the Caversham Park Road approach to the junction currently exceeds capacity and this is to exceed further as a result of the 2026 future year and the 2020 future year with development.

As has been previously stated given the existing junction is already exceeding capacity any development that seeks to increase traffic through an over capacity junction cannot be supported without mitigation being provided.

The applicant has referred to Policy RTS1 of the draft Reading Transport Strategy 2036 (RTS) which requires the “[prioritisation of] sustainable travel modes to offer an attractive and realistic alternative to the private car”. The applicant has continued to state that delivery of additional highway capacity in an area well served by public transport and with good access to the town’s cycle network is likely to encourage further car usage and undermine RBC’s aim to facilitate and encourage mode shift away from the private car, and the effectiveness of sustainable travel improvements identified in the RTS to be delivered over the lifetime of the plan.

However, it should be noted that Bus service Berry 23 that serves the development site would be required to travel through the junction in question and would be detrimentally impacted by the increase in traffic therefore affecting reliability of the service and encouraging a shift towards the private car instead of the use of an alternative mode of travel.

It has also been stated that the Local Plan has a duty to identify infrastructure requirements to support development and that no requirement for improvements at this junction has been identified either in direct relation to the allocation, or due to development over the wider area. However, it is not for the Local Plan to specify every junction that would need mitigation as a result of a planning application, this is to be determined through the assessment of the application. This is also backed up by Policy CA1 of the Local Plan that states that the development should ‘*Take measures to mitigate impacts on the highway network, particularly on Kidmore End Road and Tanners Lane*’. This is clear that the application will need to assess the impacts of the increased traffic generation and mitigate these impacts, which includes this junction.

In line with NPPF, mitigation is required for “significant impacts from the development on the transport network (in terms of capacity or congestion), or on highway safety” (paragraph 108). The NPPF continues to state that “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.

The Government response to the draft revised National Planning Policy Framework consultation dated July 2018 states that ‘The wording of the paragraph dealing with highways impacts has been altered to make clear that the ‘severe’ test relates to road capacity rather than highway safety’. It is clear from the assessment undertaken that the junction exceeds capacity and the development worsens this impact, the Highway Authority are of the opinion that this constitutes a severe impact and therefore must be mitigated.

### ***Off-Site Highway Works***

A concept drawing of the proposed pedestrian improvements are shown on Drawing 45675/5510/004.

A raised informal crossing, comprising a flat-top speed hump with a Duratherm herringbone imprint, is proposed on Kidmore End Road, Lyefield Court at its junction with Kidmore End Road, and on Grove Road at its junction with Kidmore End Road. Traffic calming measures such as these have been introduced on other strategic routes within the borough such as along the A4 Bath Road which provided off-carriageway pedestrian/cycling improvements and the creation of a new National Cycle Network route (NCN422).

Traffic calming measures can improve traffic safety at the junction by slowing vehicles down when entering and exiting the junction as well as increasing visibility of pedestrians to other road users. These informal crossings will be provided with tactile paving to facilitate the crossing of visually impaired pedestrians.

The pedestrian priority measures are also provided at both the main and secondary access to provide a connected route from the Emmer Green local centre to the development site. The proposed pedestrian priority measures are shown on Drawing 45675/5510/001A and Drawing 45675/5510/003.

A concept drawing has been submitted for a mini roundabout at the junction of Kidmore End Road/Peppard Road, Drawing 45675/5510/005. However, given the comments above regarding the roundabout junction assessment, the Highway Authority cannot agree to any alterations to the junctions that would increase queues within the vicinity of the site. A revised drawing Drawing 45675/5510/006 has been submitted demonstrating pedestrian priority improvements at the existing pedestrian refuge crossing.

In terms of the raised table, Reading Buses have been consulted and they oppose the raised crossings, regardless of height, at Grove Road and Kidmore End Road. The applicant's Transport consultant has submitted two options to better provide for pedestrians, either the current raised imprint crossings (designed to minimise impact to buses) with tactile paving or drop kerbs with tactile paving and imprint crossings at road level.

In principle, the proposed pedestrian priority measures are acceptable subject to a Stage 1 Road Safety Audit being undertaken. The works will be secured through the S106 process and a highway agreement will need to be entered into for works undertaken on the public highway.

### Construction

The applicant should be aware that there would be significant transport implications constructing the proposed development within the existing urban area of Reading. 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. Therefore, any full application would be conditioned to ensure a Construction Method Statement is submitted and approved before any works commence on-site to regulate the amenity effects of construction. As well as demonstrating a commitment to ensuring the number of HGV movements are managed and controlled, the CMS must demonstrate that appropriate measures will be implemented to ensure the

safety of pedestrians and cyclists on the road network around the construction site. The agreed measures included in the CMS become a formal commitment and will be approved by the Local Highway and Planning Department separate to the determination of this outline application.

Refusal Reasons: The proposal fails to propose any improvement to the Peppard Road / Kiln Road / Caversham Park Road junction to mitigate the impact of the development, this would be contrary to Local Plan Policies TR3

4.24 **Sustainability Manager** Taking account of the Energy Report (May 2020) and 'matters for consideration' documents. The applicant has not provided all of the information required in order to demonstrate compliance with policies H5, CC3 and CC4.

4.25 No responses have been received from the following:

Emergency Planning; Licensing; Waste Services; Clinical Commissioning Group (CCG); Reading Buses; Southern Gas Networks; SSE

4.26 **Group Responses**

**CAVERSHAM AND DISTRICT RESIDENTS ASSOCIATION (CADRA) (dated 10/3/21)**  
**-OBJECTION**

The following is a summary of CADRA's comments and there is further detail in appendices, which can be viewed on the RBC website.

- If the measures presented by the applicant for the whole course including: enhanced golf facilities at Caversham Heath; a new country park; short golf; allotments; community orchard; and new walking and cycling links, as a means of seeking to outweigh the negative impacts of a much larger development on the Reading land than was envisaged in the LP allocation, are accepted by RBC, then it is essential that a binding agreement is secured across the whole course regarding the proposed facilities.

***Allocation***

- It does not meet the allocation CA1b, which was agreed after extensive and detailed consideration - more houses, no sports facilities, adverse effect on the landscape, infrastructure, transport and education.

***Transport***

- Cumulative effects of piecemeal developments north of the Thames have created unacceptable transport pressures and the developer has failed to demonstrate that the proposal would not have a material detrimental effect on transport with implications for air quality, congestion, severance and economic viability.
- Kidmore End Road is unsuitable for a main access road.
- New homes within South Oxfordshire need to be factored into traffic predictions.
- Internal road design needs to reduce car domination.

***Landscape***

- Detrimental effect on the valued landscape; visually dominant and out of character.

#### ***Biodiversity and Climate Change***

- Significant loss of biodiversity from removal of 122 mostly mature and protected trees; replacement planting falls short of policy requirements.
- No assurance of delivery of proposed trees outside of the Borough.

#### ***Housing***

- No provision for self or custom build.

### **CAVERSHAM GLOBE (received 3<sup>rd</sup> March 2021 )- OBJECTION**

#### **Issues raised:**

- Building on a greenfield site when brownfield land is available
- Golf course provides visual amenity for the area
- Object to the felling of 122 trees which help to reduce CO2 emissions and provide habitat to wildlife.
- The proposal to plant replacement trees falls far short of the requirements in Reading's revised Tree Strategy. Planting small replacement trees would not be adequate compensation for the loss of mature trees
- Planting trees outside of the borough is not adequate compensation for the loss of mature trees and it would be hard to enforce by Reading Borough Council
- How the provision of open space for this development in South Oxfordshire - a different local authority area - could be guaranteed in the longer term Provision for open space should be made in the Reading Borough
- Increase in traffic and air pollution
- Number of proposed homes - 260 homes is double the number allocated for this site by the Local Plan
- Impact on the landscape, including the Chiltern Hills
- Impact of noise and light pollution on wildlife

### **EMMER GREEN RESIDENTS' ASSOCIATION (EGRA) (received 19<sup>th</sup> March 2021) OBJECTION**

The following is a summary of EGRA's comments (under 6 topic papers) which can be viewed in full on the RBC website:

- The proposal does not comply with the requirements of the allocation CA1b.

#### ***Traffic***

- Detrimental impact on junction of Henley Road and Peppard Road, Caversham town centre, Caversham road network and Emmer Green.
- The additional impact of up to 500 cars has been underestimated, which will cause catastrophic detriment to road users, commuters, cyclists, pedestrians
- Proposed parking for the Health centre is not adequate to meet the needs of the Health centre.

#### ***Impact on Local Infrastructure***



- Insufficient doctor and school capacity; adding a new medical centre will help alleviate some of the capacity, providing that it is staffed appropriately and has the capacity and services required by the local community.
- Detrimental impact on roads during construction and operation.
- Water infrastructure would need to be increased - Thames Water is not satisfied.
- Loss of recreational facilities and open space.

### ***Environmental***

- Loss of green space; the green areas proposed would have reduced environmental characteristics.
- Detrimental impact on wildlife, flora and fauna - how can assessments conclude negligible or minor adverse impacts without full surveys having been undertaken?.
- The 10% net biodiversity gain quoted in the application cannot be quantified or substantiated and how does the proposal align with BAP?
- Removal of protected trees - The proposed replacement with sapling trees will again take many years to reach the same level of maturity and absorb CO<sub>2</sub> to the same level as present- would not meet Policy EN14.
- The proximity of development to existing TPO trees will lead to overshadowing and potential requests to remove branches or the entire tree.
- Pollution impact - It is difficult to see that the proposed residual benefits would outweigh the adverse effects listed in the applicant's ES.

### ***Design***

- Proposed houses would be out of keeping with the character of the area.

### ***Safety***

- Potential for more accidents and increased crime and anti-social behaviour in a more urban environment.

## **KEEP EMMER GREEN (KEG)**

Submitted seven papers (totalling 91 pages, received 3<sup>rd</sup> March 2021), which are summarised under the paper headings below. Each paper includes detailed evidence and data within appendices, which can be viewed on the Council's website:

### **PLANNING PAPER**

- Conflict with RBLP allocation Policy CA1b - Larger site and more houses
- RGC will be relocating and the applicant is putting pressure on the Council to consent to the plan and has intentions to build out more than the LP site with detrimental implications for SODC and Reading residents.
- This proposal poses similar concerns to the Gladman proposal on the outskirts of Emmer Green. RBC objected to that proposal on the grounds of impacts on infrastructure and services in Reading and a consistent approach is requested.
- There are inconsistencies, basic arithmetical errors and extremely biased interpretations of data throughout; entirely non-compliant with many significant Council policies.
- Impact of construction noise, vibration and airborne pollutants on vulnerable residents, primary school, senior living accommodation and GP surgery and on highway safety and safety of residents.
- If the proposal were for the allocated area only there would be access to 9.4 hectares of open space, nearly three times the current proposal!

- To suggest that building 257 homes is the only way to prevent something bad from happening to the non-developed land is outrageous

#### **TRAFFIC AND TRANSPORT PAPER**

- There are significant errors or unreasonable interpretations of traffic data in the applicant's plan including (summarised - detailed in Appendices to KEG Traffic and Transport Paper): An increase of 42% on queue lengths on Peppard Road is not negligible; Baseline data does not reflect reality; The traffic increase on Kidmore End Road would not be 39%, but closer to 65% with detrimental effects on highway safety; the sites used for trip data are not comparable.
- There will be implications to areas north of the river and the applicant's claim that the suggested single smart signal operating system (MOVA) will improve the traffic is refuted; a complete revamp of the entire Caversham traffic system will be required; the improvement of one junction will have little effect.
- The proposed spine road is not wide enough for buses to pass.
- There is vehicle access from Kidmore End Road contrary to applicant claims.
- Development is not accessible by sustainable transport modes contrary to Policy CC6.

#### **LANDSCAPE AND LEISURE PAPER**

- It will result in the destruction of 12.15 hectares of high-quality green landscape, 8.4 hectares more development than was allocated in CA1b.
- The submission contains many errors in its assessment of landscape issues. The baseline landscape value and adverse impact on the visual amenity of key receptors have been underestimated; it is not urban fringe, but a quiet, semi-rural, classic parkland landscape - an open space dotted with trees which links beautifully into the adjoining South Oxfordshire landscape with its Chiltern dry valleys, woodlands and hedgerows. A detailed landscape analysis is provided (Appendix A of the KEG Landscape and Leisure Paper).
- There will be no benefit to landscape as a third of the tranquil golf course, will be destroyed.
- The development will be densely built, some 3 storeys with small gardens compared to the existing open, well-designed 1-2 storey houses with large verdant gardens. It will be visually dominant especially on Kidmore End Road, and out of keeping with the character of the area.
- Retention of trees are too close to proposed houses; proposed planting is sited so as to risk its future retention.
- There is no proposed effective green link contrary to Policy CA1b.
- The proposal would result in the loss of open space contrary to Policy EN8 and no replacement open space will be created. The proposed areas of open space are fragmented would be of limited benefit and would not provide amenity or recreational value to the wider community and do not match the scale and character of the existing open space.
- The proposed new Public Open Space in SODC comprises only a small part of the existing RGC land and would not be easily accessible by most residents in Emmer Green and is the least accessible part of the RGC site.

- Many residents whose homes back onto the course have gates from their gardens onto the course agreed by the club decades ago and heavily used; now forms a right of way granted by “prescription” (further detail in Appendix B of the Landscape and Leisure Paper)
- Even if the open space cannot be accessed by the public in the short-term, it has strategic value and provides many benefits as an open space.
- There will be loss of a recreational facility with no adequate replacement for the golf course at present and there are no other urban golf courses in Reading Borough.
- RGC is used by members as their “local pub” and by the local community for many different events. Some of these events may be transferrable to the proposed new location but most will not because it is not within walking distance.

### **SOCIAL ISSUES PAPER**

- Increased strain on north Reading’s already overstretched health care services contravening Policy CC9 and Policy OU1.
- The proposed empty building hardly constitutes a community benefit (not fitted out and staffed for GPs) and although there are ongoing discussions with the CCG the concern is that it may be a long time before a much-needed GP practice moves in. This has been misrepresented and should not be considered as a material consideration affecting Policy OU1.
- The applicant has not consulted and the most up-to date statistics have not been used and the data includes ‘empty nesters’ but will realistically have more children per household, therefore the overall numbers would be higher and the impact on local services has been under-estimated.
- Existing schools are already oversubscribed; the applicant’s claim that local schools can accommodate the extra pupils is disingenuous.
- The Council’s 2019 Brownfield Land Register shows 138 sites totalling 134.25 hectares on which many homes could be built.

### **ECOLOGY AND CONSERVATION PAPER**

- The site is covered by a TPO and the proposal includes removal of 122 trees, and the proposed replacement trees will not benefit the site and existing and proposed trees will be at risk due to the proximity to the proposed housing; the tree strategy does not comply with Policy EN14.
- Planting trees in South Oxfordshire does not increase the tree cover in Reading.
- Forestry Commission advises that the Council should not consider compensation measures.
- The impact on biodiversity will not be negligible; no effective green link; under-estimates of impact on rare species; insufficient protection for bats; the biodiversity gain is misleading and relies on off-site mitigation - all contrary to Policy EN12.
- The club is a very significant part of the history of the Reading area and should be protected. The benefits of the development do not “*significantly outweigh the asset’s significance*” and it does not comply with Policy EN1 and EN4.

- The significance and extent of the nearby Bronze Age Barrow cemetery is understated and there is no detailed archaeological observation, which does not comply with Policy EN2.

#### **WATER AND DRAINAGE PAPER**

- There are significant drainage issues not addressed, the existing drainage infrastructure is not sufficient, and the drainage calculations are not accurate. A Hydrogeological Impact Assessment is required where groundwater may be affected. It does not comply with policies EN7, EN11 and EN18.
- There is no assessment from the EA or Thames Water.

#### **POLLUTION**

- The assessment of air quality should be over 2km area as stated in the EIA, it is only 1km.
- Emissions will be felt over a much wider area than the applicant states.
- The applicant uses an incorrect method of measuring NO2 concentrations at the site and in Caversham, where NO2 levels are much higher, it is likely that PM2.5 levels will be much higher also, which is completely ignored. There are false claims regarding CO2 emissions from the predicted extra traffic. All this does not comply with Policy EN15.
- The development does not comply with requirements for CO2 emissions reductions and is therefore, contrary to Policy CC3.
- The noise data does not represent ambient conditions and does not comply with Policy EN17, and the level of noise and vibration will not comply with Policy CC8.

It is noted that further responses from KEG and the applicant were submitted:

10<sup>th</sup> March Supplementary Objection

30<sup>th</sup> March Produced by Applicant : *Response to KEG Representations*

19<sup>th</sup> May Detailed rebuttal of the applicant's document titled "Response to KEG Representations" dated 30th March 2021

26<sup>th</sup> May 2021 KEG response to the applicant's Technical Note No 5500/TN008 dated 19th March 2021.

26<sup>th</sup> May "Response to KEG Representations" dated 30th March 2021 by Friends of the Earth

26<sup>th</sup> May KEG comments on Environmental Concerns submitted to Susanna Bedford by Ross Jarvis (Senior Environmental Health Officer) on 22nd March 2021 and published on the Planning Portal on 19th May 2021

26<sup>th</sup> May KEG comments on the Transport Development Control report submitted to Susanna Bedford on 29th April 2021 and published on the Planning Portal on 18th May 2021

6<sup>th</sup> July Individual Topic Papers re Trees; Transport; Land contamination; Chilterns Area of Outstanding Natural Beauty; and Compliance Check list.

### **Reading Friends of the Earth (received 10/2/2021) OBJECTION**

- Proposal does not make significant use of on-site renewable energy generation options counter to policy.
- Construction phase emissions and mitigation are ill-defined and insignificant tree-planting is proposed.
- Insulation standards unacceptably low and the scheme should aspire to passive house levels in order to be sustainable.
- On-site renewable energy generation should be increased, incorporating significant numbers of PV panels on suitable roofs. The proposal does not make a significant use of on-site renewable energy generation options.
- Ground-sourced heating should be utilised (nb: geothermal?).
- While it is acknowledged that central government dictates the number of homes Reading must give permission to build; is this better or worse than smaller, different, alternate sites, styles, or making better use of existing housing stock?
- No discussion of the very substantial impact removing trees has in terms of releasing stored embodied carbon (for example between 100-2000 tons of CO<sub>2</sub> are released when these are burned). Replacing like-for-like will take at least several decades to break even in terms of carbon emissions.
- Proposed planting of trees appropriate to wildlife interests of an ASNW may not result in the rapid carbon sequestration required within the time-frame required to meet international climate target timelines, and thus, may not be relevant to the discussion. Furthermore, these species may not be able to survive the changing UK climate.
- Some climate change adaptation measures need to be addressed at an early design stage and built into the construction. Greywater/ rainwater harvesting for reuse within buildings requires substantial underground storage systems, probably best sited under car parking areas and retrofitting is far more expensive and leads to further emissions; rainwater harvesting for use on the land requires open areas to be left between development blocks that can hold a SUDS system in the future without damaging trees; control systems for buildings need to be for heating and cooling and imply systems that can provide both in an energy efficient manner.

### **Member of Parliament for Reading East - Matt Rhodda OBJECT**

- Very concerned about the significant effect on the local environment and it's contributions to wider environmental problems.
- Proposed development would put 500 extra cars on local roads at a time when residents already face severe delays due to existing traffic on routes such as Peppard Road.
- Likely to result in an increase in carbon dioxide emissions from increased local transport movements and congestion.
- Loss of substantial wildlife habitat.

- Impact on residents during construction due to serious noise and other disturbances.
- Site is surplus to requirements due to Reading Borough Council's sufficient housing supply; largely being met by brownfield land.
- It is noted the level of concern within the community is very large.

### **X) Others**

4.23 The applicant has provided a Statement of Community Involvement that sets out that engagement and communication that has been undertaken prior to the submission of the planning application. This included a public engagement event on 11th February 2021 which was publicised by invitation flyers distributed to the 2,300 closest properties,

#### **4.24 Public consultation responses**

Site notices were erected at 5 locations surrounding the site on 4<sup>th</sup> February 2021.

A press notice was published on 11<sup>th</sup> February 2021 in the Reading Chronicle. Adjoining occupiers were formally consulted by letter, as produced on 5<sup>th</sup> February 2021.

This consultation period ceased on 18<sup>th</sup> March 2021.

Within this consultation period the Council logged approximately 3000 responses. 171 in support of the application and 2770 in objection.

Following the submission of /amended additional information (shown on the Councils website as received 27<sup>th</sup> May 2021) the following formal re consultation was undertaken:

Site notices were erected on 10<sup>th</sup> June 2021

A press notice was published on 10<sup>th</sup> June 2021 in the Reading Chronicle.

Adjoining occupiers were formally consulted by letter, as produced on 9<sup>th</sup> June 2021. This consultation period ceased on 9<sup>th</sup> July 2021.

Within this consultation period the Council logged 1 anonymous letter in support of the application and 8 responses including KEG in objection.

4.25 Due to the exceptionally large number of comments received a summary of the issues raised through out at both consultation stages is set out at Appendix 1.

Members should note that given the amount and length of objections received, officers have had to succinctly summarise a wide range of individual points on the same general theme, in some cases. Members should also note that:

- There have been comments that were multiple objections from some objectors
- Some objections received were anonymous - these objections have been loaded the Council website so are able to viewed by third parties and have been read however these comments have limited weight when summarised by the case officer
- Similarly, objections without the correct contact details cannot be further contacted by the Local Planning Authority.

## 5.0 RELEVANT PLANNING POLICY AND GUIDANCE

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) which states at Paragraph 11 “Plans and decisions should apply a presumption in favour of sustainable development”.

5.2 Replacement Minerals Local Plan (RMLP) adopted in 2001  
Policy 2

Emerging Joint Central and Eastern Berkshire (JCEB) Mineral and Waste Plan  
Policy M2  
Policy M4

Reading Borough Local Plan (November 2019).

The relevant policies are:

CC1: Presumption in Favour of Sustainable Development  
CC2: Sustainable Design and Construction  
CC3: Adaptation to Climate Change  
CC4: Decentralised Energy  
CC5: Waste Minimisation and Storage  
CC6: Accessibility and the Intensity of Development  
CC7: Design and the Public Realm  
CC8: Safeguarding Amenity  
CC9: Securing Infrastructure

EN1: Protection and Enhancement of the Historic Environment  
EN2: Areas of Archaeological Significance  
EN7: Local Green Space and Public Open Space  
EN8: Undesignated Open Space  
EN9: Provision of Open Space  
EN10: Access to Open Space  
EN12: Biodiversity and the Green Network  
EN13: Major Landscape Feature  
EN14: Trees, Hedges and Woodland  
EN15: Air Quality  
EN16: Pollution and Water Resources  
EN17: Noise generating equipment  
EN18: Flooding and Drainage

H1: Provision of Housing  
H2: Density and Mix  
H3: Affordable Housing  
H5: Standards for New Housing  
H10: Private and Communal Outdoor Space  
TR1: Achieving the Transport Strategy  
TR3: Access, Traffic and Highway-Related Matters  
TR4: Cycle Routes and Facilities  
TR5: Car and Cycle Parking and Electric Vehicle Charging

RL6: Protection of Leisure Facilities and Public Houses  
OU1: New and Existing Community Facilities

CA1: SITES FOR DEVELOPMENT IN CAVERSHAM AND EMMER GREEN

**CA1b PART OF READING GOLF COURSE, KIDMORE END ROAD**

*Development for residential and replacement clubhouse, subject to the future provision of golf on the remainder of the Golf Club site, which fulfils an important sports and leisure function for Reading, being secured. On-site facilities should be provided to mitigate impacts on community infrastructure, including for healthcare. On-site public open space will be provided.*

*Development should:*

- *Avoid adverse effects on important trees including those protected by TPO;*
- *Provide a green link across the site from Kidmore End Road to the remainder of the golf course, rich in plant species and habitat opportunities;*
- *Ensure that vehicular access is provided from suitable roads to the area to be retained for golf;*
- *Take measures to mitigate impacts on the highway network, particularly on Kidmore End Road and Tanners Lane;*
- *Include all parking requirements within the site to avoid exacerbating parking issues on existing streets;*
- *Take account of potential archaeological significance; and*
- *Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.*

*Site size: 3.75 ha 90-130 dwellings, community provision including healthcare and replacement clubhouse*



5.3 Relevant Supplementary Planning Documents (SPD) are:

- Affordable Housing (March 2021)
- Employment, Skills and Training (2013)
- Revised Parking Standards and Design (2011)
- Planning Obligations under Section 106 (2015)
- Sustainable Design and Construction (2019)



- 5.4 Other relevant documents include:  
Reading Borough Council Tree Strategy (March 2021)  
Reading Biodiversity Action Plan (March 2021)

Reading Open Space Strategy Update Note (2018)  
Reading Open Space Strategy (2007)

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

National Design Guide

National Design Codes

The Community Infrastructure Levy (CIL) Regulations (Amended 2015)

Berkshire (including South Bucks) Strategic Housing Market Assessment

BRE Site Layout Planning for Daylight and Sunlight - A guide to good practice, 2<sup>nd</sup> edition (2011)

DCLG Technical housing standards - nationally described space standard (2015)

Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking (Historic England, 2015a)

Natural Environment and Rural Communities (NERC) Act 2006

Local Transport Note 1/20 Cycle Infrastructure Design dated July 2020 (Department for Transport)

Manual For Streets 2007 (Department for Transport)

CD 195 - Designing for cycle traffic (Standards for Highways 2020)

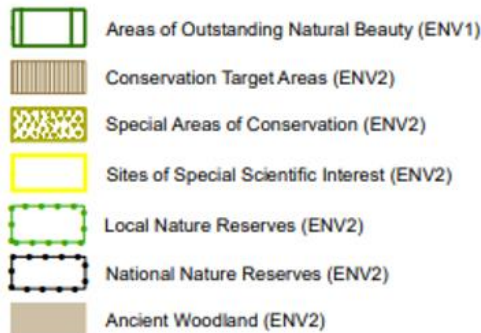
Local Cycling and Walking Improvement Plan 2020-2030 (LCWIP) (November 2019)

The Reading Climate Change Partnership's (RCCP) Reading Climate Emergency Strategy 2020-25 (November 2020)

To set the site in the context of the adjoining land this portion of the Reading Golf Course land ownership contains designations with the South Oxfordshire Local Plan 2035. As set out in the plan extracts below designations include an Area of Ancient Woodland (known as Cucumber Wood) and Conservation Target Areas. The application site is also set approximately 1km from the edge of the Chilterns Area of Outstanding Natural Beauty (AONB).



**Extract from South Oxford Local Plan Proposals Map and key**



## 6 APPRAISAL

The main issues considered to be raised by this application for outline planning permission are:

- Principle of development
- Loss of Recreational Facility/Undesignated Open Space/ Provision of Open Space
- Provision of Housing
- Residential Density, Mix and Affordable Housing
- Layout / Scale /Landscaping
- Protected Trees, Ecology and Biodiversity
- Transport Matters
- Impact on Residential Amenity
- Pollution / Water Resources and SUDS
- Sustainable Development
- Historic Environment / Areas of Archaeological Significance
- Mineral Deposits
- Community Facilities
- S106 / CIL

### 6.1 Principle of development

6.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires that proposals be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case the development plan for the area is the Reading Borough Local Plan (2019). At a national level, the National Planning Policy Framework (NPPF) constitutes guidance which the Local Planning Authority (LPA) must have regard to. The NPPF does not change the statutory status of the development plan as the starting point for decision making but does constitute a material consideration in any subsequent determination.

6.1.2 The NPPF paragraph 117 states ‘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 130 also states in relation to ‘Achieving well designed places’ that ‘Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents’.

6.1.3 Local plan Policy CC1 Presumption in Favour of Sustainable Development sets out that *“Planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Proposed development that conflicts with the development plan will be refused, unless other material considerations indicate otherwise”*.

6.1.4 Policy CA1b

As set out in the Policy Section above a portion of the application site includes the area allocated in the Local Plan as CA1b. However, the application site encompasses an area significantly larger than the allocated land and would have the effect of removing any potential for an 18-hole golf course on the remainder of the site. The proposal therefore does not represent the form of development envisaged under Policy CA1b, and officers therefore do not consider that the proposal should be considered as having specific policy support on this basis.

6.1.5 In order to consider the development proposals further officers must consider whether it has been adequately demonstrated that the development as set out in Policy CA1b is not able to be delivered. It is noted this is a matter which has been subject to considerable discussion through the Local Plan Inquiry process, and at the time that the Local Plan was examined, it was concluded that there was sufficient potential for delivery of Policy CA1b to justify its inclusion within the Local Plan.

6.1.6 The submitted Planning Statement dated January 2021 that accompanies this planning application sets out (section 4) how the position of Reading Golf Club (RGC) has altered since the Local Plan Inquiry. It is stated that RGC is contractually committed to its move to Caversham Heath Golf Club, which has now taken place, and as described above, the ‘reduced golf offer’ on part of the remaining land in South Oxfordshire is now operating as ‘Fairfax Family Golf’. The applicant considers that the development envisaged by the Reading Local Plan, with a limited residential development to secure the golf use on the remainder of the site cannot now realistically be delivered. Therefore, officers considered that this submission should be considered on its own merits and determined based on other relevant policies in the Local Plan and other material considerations.

6.2 Loss of Recreational Facility/Undesignated Open Space/ Provision of Open Space

6.2.1 Loss of Built Golf Recreational Facilities

In relation to the loss of golf facilities within the application site this must be considered against Policy RL6: ‘Protection of Existing Leisure Facilities and Public Houses’. It should be noted that only the clubhouse facilities are relevant to RL6, as supporting text at 4.6.31 of the Local Plan specifies that this policy deals only with built sports and leisure facilities. This Policy states that the loss of a sport/recreation/ leisure facility will not be permitted unless there is a) no need for this type of facility in this area; or b) the function of the facility would be adequately fulfilled by an existing facility, where that facility would be at least as accessible to the same catchment.

6.2.2 The Planning Statement sets out that there is an oversupply of golf courses in the Reading Area and the function of the facility at Reading Golf Club can be provided at Caversham Heath Golf Club (CHGC). The facility at CHGC has been

considered by officers and within the consultation response from Sport England /Golf England. Sport England cite four improvements at CHGC, three of which (improved clubhouse facilities, 18th hole/remodelling and putting green) have now received planning permission from South Oxfordshire District Council. The other, a sixes/academy course, is expected to be subject to a future planning application. This seems to be an inherent part of their support for the development. As the improvements to the clubhouse at CHGC have now received planning permission they can be considered in relation to Criteria b) of Policy RL6.

- 6.2.3 It is considered that criteria b) is adequacy fulfilled by the existing club house facility at CHGC to be upgraded. Concerns are noted in relation to whether Caversham Heath Golf Club is genuinely as accessible to the membership as the current site by all modes of travel (as set out in 4.6.32 of the Local Plan). There is a bus stop in reasonable proximity to Caversham Heath, but this requires using an unmade footpath across a field. The walking routes from Reading itself are on a footpath crossing the golf course from Blagrove Lane, or along the narrow A4074 footway. This compares to the current situation, where the clubhouse is easily accessed from within streets in the town itself. However, the reality of travel to the golf course will be that the vast majority of trips will be by car regardless of location due to the need to bring bulky equipment. Proposed travel plan measures for the clubhouse (promotion of existing walking, cycling and public transport options and reducing single car occupancy) were secured as a condition of South Oxfordshire permission P20/S1619/FUL, which will ensure accessibility by all modes as far as is possible. Therefore, officers consider that compliance with policy RL6 can be demonstrated.

#### Loss of undesignated open space

#### Ariel photograph of the site



6.2.4 Open space which is not specifically identified in policy EN7 (which does not designate the Reading Golf Club site) is protected by Policy EN8 ‘Undesignated Open Space’. Neither policy EN8 nor the glossary of the Local Plan give an official definition of open space. However, paragraph 4.2.30 clarifies that EN8 is required to protect important recreational and amenity resources wherever possible.

6.2.5 In addition, paragraph 4.2.28 (supporting policy EN7) gives further explanation of why open spaces are important, and this indicates how open space is to be interpreted in the context of the Local Plan:

*“Open space policies contribute towards many of the goals of the Council’s Health and Wellbeing Strategy (2017-2020) by supporting residents to make healthy lifestyle choices and reducing social isolation through public open space. Additionally, these policies contribute to the delivery of many other Council objectives in terms of supporting an urban renaissance, defining the character of a town and place, promotion of social inclusion and community cohesion, health and well-being, climate change adaptation, and the promotion of sustainable development.”*

6.2.6 The Open Spaces Strategy adopted March 2007, which helped to underpin the Local Plan, defines open space within table 2.1 as follows:

*“Any unbuilt land within in the boundary of a village, town or city which provides, or has the potential to provide, environmental, social and/or economic benefits to communities, whether direct or indirect.”*

6.2.7 Meanwhile, the NPPF last updated on 2019 defines open space in its glossary as follows:

*“All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.”*

6.2.8 What is clear from these definitions is that open space is land which performs multiple functions, including sport and recreation, visual amenity, climate change and sustainable development, which can include matters such as biodiversity. Land cannot be included or excluded from the definition and therefore from the application of EN8 on the basis of one factor alone, and EN8 does not differentiate in the protection it gives open spaces that serve different purposes. As stated in both paragraph 4.2.30 and 4.2.31 of the Local Plan, policy EN8 also covers land in public or private ownership.

6.2.9 As the majority of the site (other than the clubhouse and car park) is undeveloped land, it is clear that the proposal would result in a loss of undesignated open space, and that policy EN8 therefore applies. The applicants’ Planning Statement on p36 acknowledges that the proposal will result in a loss of undesignated open space.

6.2.10 It is worth quantifying the scale of the loss of undesignated open space. The applicant’s Briefing Note of 2<sup>nd</sup> July 2021 provides the figures on which this can be calculated. There is currently 11.44 ha of undesignated open space on site, the vast majority of the site. Of this, 3.93 ha would be lost to built form. Meanwhile 3.44 ha would be residential gardens. The Briefing Note considers

that residential gardens can be treated as continuing as undesignated open space. However, in officers' view this would be an inappropriate way of considering the matter. Policy EN8 states, 'Development should not result in the loss of or jeopardise use and enjoyment of undesignated open space'. As such, the open space, which currently takes the form of a golf course would be lost to individual residential plots and fenced in; thereby losing the visual amenity aspect of the current space. Additionally, there are extensive permitted development rights for householders to extend, erect outbuildings or to create decking or hardstanding. Unless all of these permitted development rights were to be removed as part of a permission, the continued existence of gardens as undesignated open space could not be guaranteed. Therefore, it is considered that the undesignated open space that would be lost should be treated as 7.37 ha. With the remaining parts of the site (formal and informal open spaces, SuDS etc) retained as undesignated open space. This is therefore a very significant loss of undesignated open space. For context, the Open Spaces Strategy Update Note (2018), prepared to support the Reading Borough Local Plan, calculated the overall net change in open space (both with or without public access) between 2007 and 2017 as being a loss of 19 ha, so this development would result in more than one third of the amount of space being lost on one site that was lost over that ten year period across Reading. Clearly, this is a matter that requires serious consideration.

6.2.11 As the proposal represents a loss of undesignated open space, it therefore needs to be considered against the following criteria as set out in EN8:

*“Development may be permitted where it is clearly demonstrated that replacement open space, of a similar standard and function, can be provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space.”*

6.2.12 The applicants' view as set out in the Briefing Note of 2<sup>nd</sup> July 2021 is that the open space proposed to be provided within the application site is sufficient to comply with policy EN8 on its own. However, the applicant additionally proposes that financial contributions be made towards 3G pitch provision in the area and towards the upgrade of Emmer Green Playing Fields play area. Should this not be considered sufficient, the applicant further states within the Briefing Note that a 5 ha area of the remaining golf club land, within the applicant's ownership, but outside the application site, located within South Oxfordshire, be provided as open space. In all cases, the consideration of whether these proposals are sufficient to comply with policy EN8 involves the second part of the part of the criteria outlined above, i.e. that “improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space”, because all of the proposed replacement land proposed is already either designated or undesignated open space in the meaning of the policy. The policy does not specifically state that “remaining open space” needs to be within the red line boundary of the application, and the use of similar wording later in the plan in 8.3.2 refers to the parts of the golf club land outside the CA1b allocation as the “remaining land” indicates that it would be reasonable to include the rest of the golf club site within this definition.

6.2.13 Below, Policy EN8 has been considered in relation to each of the three mitigating proposals offered by the applicant. i.e.

- whether the open space offer within the application site is sufficient in its own right,
- secondly whether it is sufficient in combination with the off-site financial contributions, and
- thirdly whether the whole package including the off-site open space/country park is sufficient.

In doing so, it must be borne in mind that, should benefits proposed through a Section 106 agreement exceed what is required to make the development acceptable, they will fail the legal test in Regulation 122 of the Community Infrastructure Levy Regulations of being “necessary to make the development acceptable in planning terms”.

6.2.14 In terms of the first consideration, whether the on-site improvements on their own suffice to meet EN8, in officers’ view, in order for open space improvements to clearly outweigh the loss of the open space, those improvements must not ‘result in the loss of or jeopardise use and enjoyment of undesignated open space’. In particular that of EN9 (considered separately), but also in terms of other considerations such as provision of SuDS in line with EN18 and retention of a Green Link in line with EN12. Comments received from Leisure address this point, as set out above section above, and note insufficient public open space on the site without provision of a MUGA or sufficient play provision. Officers are therefore of the view that the overall quantity of open space on site may be sufficient were it only serving to fulfil policy EN9 in terms of provision of open space, albeit that the specific facilities proposed are not and would require off-site mitigation, but it certainly does not go above and beyond the basic expectations for a site of this size that would be required to justify a loss of undesignated open space in line with policy EN8 as set out above.

6.2.15 In terms of the second consideration, the applicant relates to the first mitigation proposal, in that the off-site financial contributions are provided in order to address the fact that the development does not meet the requirements of policy EN8 and EN9 in full on-site. In particular, the development does not provide a MUGA or sufficient play facilities, and the financial contributions directly ensure compliance with EN9, not the loss of undesignated open space under EN8. Therefore, these proposed contributions do not meet policy E8 requirements for any site of this size, and do not therefore justify the loss of undesignated open space.

6.2.16 In terms of the third consideration, securing land outside the Borough as public open space, there are some inconsistencies with the submitted information. The Briefing Note of 2<sup>nd</sup> July refers to 5 ha, yet the submitted Community Infrastructure Plan shows that the areas provided would include a country park (2.83 ha or 2.91 ha, depending on whether one refers to the map or key), community orchard (1.12 ha) and potential land for allotments (0.41 ha). The total of that provision is around 4.4 ha. The Briefing Note states that these 5 ha provide ‘net benefits to open space available to residents in the borough’. The Cucumber Wood itself, an ancient woodland, would not be made publicly

accessible and would therefore have no change in its status other than that the S106 would include arrangements for its management, and therefore does not represent a net increase in public open space.

- 6.2.17 The EN8 policy test is whether improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the undesignated open space. In this case, this means comparing the granting of public access to 4.4 ha of the existing golf course to the loss of 7.37 ha of undesignated open space. Officers' view is that, in principle, if these measures can be secured, they would be sufficient to outweigh the loss. The site has historically been inaccessible to anyone but members, so the provision of public access to an area of land around 60% of the size of the land to be lost, in close proximity to the development and also accessible from nearby residential streets, does represent a significant improvement of recreational facilities that will benefit a wider area. The Planning Statement is also correct on p40-41 to note that this would help to fill one of the few remaining gaps in access to recreational public open space in the Borough as recognised in the Open Spaces Strategy (2007) and subsequent Update Note to support the Local Plan (2018). The fact that the space would be provided outside the Borough does not mean that it would not primarily serve residents of Reading, and in this case virtually all of the homes within 400 metres of the new country park would be within Reading Borough. As no development to provide car parking is proposed, it would mainly be accessible to those on foot, and would therefore primarily serve Reading Borough residents.
- 6.2.18 It is worth noting that Sport England's representation notes the importance of the country park proposal, and states that this may generate more activity from locals than the golf. This gives further support to the contention that the country park offer is not an optional addition but is fundamental to the assessment of the application, because it is clearly part of the assessment that has led to Sport England support for the proposal. This is relevant because policy EN8 was drafted to comply with (then) paragraph 74 of the 2012 NPPF (now paragraph 97 of the 2019 version), around which Sport England's own guidance is based.
- 6.2.19 The status of allotments shown on the Community Infrastructure Plan are unclear. Whilst they appear on this plan, the Briefing Note of 2<sup>nd</sup> July (paragraph 11) states that these could be provided in the future if demand existed, but also that a £100K contribution would include the provision of allotments. There are likely to be advantages and disadvantages to allotment creation in this location. The Infrastructure Delivery Plan, drawn up alongside the Local Plan, identifies a need for allotment creation and enhancement, particularly in the north and west of the Borough, and opportunities for such creation are rare. However, allotments are likely to frequently require access by car, and would generate concerns about the impact on narrow local roads within South Oxfordshire. It is not therefore considered that allotments would be essential to outweigh the loss of undesignated open space, and that the inclusion of the earmarked space within the wider public open space rather than as allotments is likely to suffice.
- 6.2.20 For clarity, officers have not included the 9-hole golf course shown on the Community Infrastructure Plan within consideration of compliance with policy



EN8, because, although this is currently operating, there are no proposals forthcoming to secure this provision for the future as part of the planning application, and it cannot therefore be relied upon.

- 6.2.21 In summary therefore, the off-site open space, albeit in South Oxfordshire is necessary to make the development acceptable in planning terms, and if the provision in perpetuity and subsequent maintenance of this facility with public access from the development and other points within Reading could satisfactorily be secured as part of the permission, officers consider that it would be sufficient to comply with the requirements of policy EN8, as it would represent improvements to recreational facilities on remaining open space to a level sufficient to outweigh the loss of the open space.
- 6.2.22 It would be essential that the 4.4 ha of off-site open space is provided as early as possible to compensate for the loss of open space that will occur immediately, and the applicant suggests this should be provided prior to development commencing, which is agreed. It is essential that any details of the management and maintenance of the country park would be secured through a legal agreement.
- 6.2.23 It falls to be considered whether it has been sufficiently demonstrated that this off-site open space can be delivered.
- 6.2.24 For the avoidance of doubt South Oxfordshire District and Reading Borough Council do not share a joint Local Plan. The first element of deliverability involves whether it would cause conflict with the relevant development plans. The location of the proposed country park falls within an area for which the development plan would consist of the South Oxfordshire Local Plan and Kidmore End Neighbourhood Development Plan. These development plans would be relevant only to any part of the proposal which falls outside Reading Borough, i.e. the proposed off-site open space, not to the site within the red line boundary of this application. Although the proposed use as a country park is not currently considered to represent a development proposal requiring permission, it is still worth considering potential conflict with the relevant development plans in that location in general terms should this change in future.
- 6.2.25 The South Oxfordshire Local Plan (SOLP) was adopted in December 2020, and sets out policies and proposals across the whole District. In terms of specific designations, the Proposals Map identifies only the Cucumber Wood as ancient woodland and the wood and areas to the west and east as a conservation target area, with both designations being dealt with by policy ENV2. As the proposals would not cause loss of or harm to these areas, there would be no conflict with ENV2. In more general terms, the proposals would help to protect and enhance the countryside in line with policy STRAT1 (The Overall Strategy) point ix. Policy CF3 (New Open Space, Sport and Recreation Facilities) states that new recreation facilities will be encouraged and supported and well related to the settlements they serve, which would be the case here. It also states that:

*“Provision for the future long-term maintenance and management of the open space and/or facilities will be sought and must be agreed as part of the planning application.”*

- 6.2.26 Subject to securing long-term public access, maintenance and management of the space, there is not therefore considered to be a likely conflict with the SOLP.
- 6.2.27 The Kidmore End Neighbourhood Development Plan (KENDP) is an emerging document, having been published for Pre-Submission consultation stage in November 2020. The Parish Council are currently reviewing the responses received. It is not yet therefore formally part of the Development Plan, but would likely be a material consideration for any proposals within the neighbourhood area. The most relevant of the draft policies is LPLV, the Local Valued Landscape Policy, with the Cucumber Wood area falling within a defined Local Valued Landscape, where development proposals “should only be permitted where they protect and enhance the physical and visual attributes of the character, quality and appearance of this valued landscape”. Whilst it is not considered that the proposed use as a country park represents a development proposal requiring permission, it should in any case serve to protect and potentially enhance this valued landscape and would not therefore conflict with LPLV. It should also help to conserve the setting of the AONB (policy LPCS) and should help to maintain a physical and visual separation between settlements and preserve and enhance the rural look and feel of the roads and lanes between settlements (policy LCQL). Therefore, there is not considered to be a potential conflict with the KENDP.
- 6.2.28 The next aspect of deliverability is in terms of whether it would result in unacceptable transport impacts. No new parking is proposed within the land, and it is therefore expected that access would be generally on foot from surrounding areas. There is a car park on land to the north serving the foot golf facility, but this is within the management of Reading Golf Club and it is considered that use of the car park could be restricted to prevent traffic impacts as a result of the country park. This should not therefore necessarily affect the deliverability of the offer.
- 6.2.29 However, more broadly, there is a lack of certainty about what the proposal actually entails. As set out in paragraphs above there is inconsistency in terms of submitted information about the extent of the site and whether or not allotments are included. The submitted Community Infrastructure Plan shows footpaths extending beyond the northern boundary of the site into South Oxfordshire towards Highdown Hill Road and Kidmore End Road, essential to ensure that the open space is accessible to residents of the proposed development, but which do not extend as far as the off-site open space and do not therefore appear to form part of that proposed offer.
- 6.2.30 It is also considered that, as land falls within South Oxfordshire, South Oxfordshire District Council (SODC) would be the enforcing authority in terms of the Section 106 agreement, and would need to be a party to this agreement, and therefore willing to proactively enforce against a breach. Officers have not been provided with any information that confirms SODC’s willingness to be a party to such an agreement or that any substantive discussions have taken place on this matter.
- 6.2.31 The Management Company arrangements are also underdeveloped. According to the applicant’s Dean Wilson note of 5<sup>th</sup> July 2021, 26% of the share capital

of the Management Company would be transferred to the Council. It is not clear from Leisure responses whether this is an arrangement that would be acceptable to the Council, as, whilst the 75% majority vote requirement means that the Council would essentially hold a veto, it would not necessarily be able to positively influence decisions. The Briefing note states that £100,000 will be offered to manage and maintain woodland planting, allotment provision, open spaces and footpaths and cycleways on land within the Golf Course in South Oxfordshire over 20 years. There is no supporting information to justify that £100,000 is a sufficient sum to manage the open space, or whether funds will be replenished should they fall short during the 20 year period. In addition, there is no justification offered of why the funds cover a 20 year period only; when the land must remain as open space in perpetuity (unless there is a significant intervening event requiring the change in status). This proposal is lacking in key details and therefore the Council is not in a position where it can agree this proposal in principle.

6.2.32 Therefore, whilst the concept of meeting policy EN8 through the proposed off-site open space is considered to be acceptable in this instance, it has not been sufficiently demonstrated that it can be delivered in practice. For this reason, there is a failure to demonstrate compliance with policy EN8.

6.2.33 Provision of Open Space

As reference above Policy EN9 sets out that all new development make provision for appropriate open space on site. This can be achieved through on or off site provision contributions to existing leisure facilities or recreational facilities. On sites of 50 dwellings or more, or for developments where the availability and quality of existing open space has been identified as deficient, new provision will be sought. Development must ensure satisfactory provision of children's play areas and neighbourhood parks (described in the local plan as LEAP + informal space).

6.2.34 This policy also sets out the criteria for new open space which should be in useable parcels of land and not be fragmented; Be safely and easily accessible and not severed by any physical barrier, including a road; Be accessible to the general public and be designed so as to feel that it is part of the public and not private realm; Create a safe environment, appropriately considering lighting and layout to reduce the fear of crime; Provide some informal landscaping for aesthetic, wildlife and recreational purposes; and Link into the Green Network where possible.

6.2.35 The level of open space proposed with the development is set out in the table below (also provided in the proposals section).

Table of Open Space Provision On Site			
	Quantum Guideline (hectares per 1000 population)	Quantum Required Based On 260 Units (2.4 people per unit)	Quantum Provided On Site
Playing Pitches	1.2	0.75ha	0ha
All Outdoor Sports	1.6	1.00ha	0ha
Equipped / Designated Play Area	0.25	0.16ha	0.16ha (plus informal play throughout within parks and gardens)
Other Outdoor Provision (MUGAs and Skateboard Parks)	0.3	0.19ha	0ha
<b>Total Formal Outdoor Space Quantum</b>		0.16ha (Play only) 1.94ha (Sports)	0.16ha (Play only)
Parks and Gardens	0.5	0.31ha	1.05ha
Amenity Green Space	0.6	0.37ha	1.03ha
Natural and Semi-Natural	1.8	1.12ha	1.29ha
<b>Total Informal Outdoor Space Quantum</b>		1.8ha	3.37ha
<b>Total Open Space Quantum</b>		<b>1.96ha (excluding sports)</b>	<b>3.53ha</b>
SuDS (In addition to the above)			0.49ha

FIGURE 3.5B – OPEN SPACE PROVISION ON SITE REFERENCING TO FIELD IN TRUST OPEN SPACE GUIDANCE (FABRIK, MAY 2021, TO REFLECT THE LATEST LAYOUT)

The current layout provides a single LEAP (Local Equipped Area of Play) in the centre of the site, the rest of the open space categorised as informal open space. The proposal is therefore required to provide off site mitigation for the lack of formal play areas / sport facilities on site in order to meet the requirement of EN9. The applicant proposes a contribution of £50,000 towards an upgrade of Emmer Green Playing Fields Play Equipment; and a contribution of £250,000 towards provision of 3G sports pitch provision to be secured by S106. There are also considered to be constraints to the usability of the other areas of public space as set out elsewhere in this report. Therefore, as set out above, the provision of open space within the site and off site mitigation measures are considered required in order for the proposal to comply with Policy EN9.

### 6.3 Provision of Housing

6.3.1 Policy H1 Provision of Housing sets out the housing target in Reading Borough for the period 2013 to 2036; and that the RBC will work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure this will be met. Due to Reading being a very tightly defined area, new development must be considered on balance, and providing more housing to meet more of the assessed needs is not necessarily positive if it results in a conflict with other local plan policies. The Local Plan has identified a way of dealing with the shortfall identified in Policy H1, in agreement with the other authorities in the Western Berkshire HMA and has a signed Statement of Common Ground dating from October 2017 to that effect.

6.3.2 The applicant has queried the deliverability of some of the land identified to meet the Local Plan housing supply. For example, the planning statement raises uncertainties in delivery of sites like SR2 (Land North of Manor Farm Road) and

discusses the densities that would be required. However, this was known at the time of Local Plan drafting and examination, and this is the reason that allowances for non-implementation are included within the relevant calculations (20% in the case of SR2), so this has all been taken into account already, and does not amount to an argument in favour of the proposal.

- 6.3.3. The most recent Annual Monitoring Report 2019-20 was published in December 2020, and this shows the most recent calculations of expected housing land supply over both the next five years and the entire lifetime of the Local Plan. It shows that there is currently a 6.65 years' supply of housing land. An updated version of the Housing Trajectory is also included that shows, based on most recent calculations, over the lifetime of the plan the number of homes delivered is expected to exceed policy requirements by over 550 homes, which would be enough to absorb the Local Plan shortfall.
- 6.3.4 It is noted the applicant also raises specific Local Plan allocations in the Caversham and Emmer Green section of the Local Plan. In particular, they identify a shortfall in meeting the 'target' of 700 homes in Caversham and Emmer Green however the Local Plan makes very clear that the 700 figure in Caversham and Emmer Green is not to be treated as a target. Paragraph 8.2.3 states that "It is important to note that this is an indication of potential capacity, not a policy target." Additionally, even if it were a target, there would not be a shortfall as explained in the previous paragraph. Therefore, at this time it can be demonstrated that there is not a shortfall in housing provision that would tip the balance and outweigh other important policy considerations, such as the loss of undesignated open space.

#### **6.4 Residential Density, Mix and Affordable Housing**

##### **Density**

- 6.4.1 Policy H2 'Density and Mix' sets out a number of factors that appropriate density for residential development will be informed by, including the character and mix of uses of the area in which it is located including important landscape areas; the need to achieve high quality design, and the need to minimise environmental impacts. This policy does state that 'Net densities of below 30 dwellings per hectare will not be acceptable'. As set out by the developer the scheme represents a gross density of 21.15dph or a net density of 32.0dph; when removing 3.53ha of Public Open Space, 0.49ha of SUDs and 0.09ha of street planting from calculations. However, a density should not be considered in isolation for, as set out in the following sections of this report, it should be weighed against the context of the site, other policy objectives and the need to achieve high quality design.
- 6.4.2 Policy H2 also seeks that at least 50% of the homes outside centres will be three-bed or larger, this application proposes 63%. It is accepted that this provision in excess of the policy requirement is a material consideration in favour of the development however this has to be weighed very carefully in the planning balance against the landscape constraints; the need for good design and loss of undesignated green space within the site. In the context of this site, where an alternative layout and density could be considered, the proposed number of large family homes is not considered to outweigh the landscape constraints within the site.

6.4.3 The Planning Statement does not include any recognition of the provisions within the final part of policy H2 on self-build homes. This proposal, as it includes more than ten houses, should “consider making appropriate provision for plots as self- or custom-build wherever viable and achievable”. Officers would expect the applicants to consider what provision can be made for self- and custom-build within the development in line with policy H2. Were the recommendation be to approve this outline proposal had the layout plans or Design and Access Statement referred to where these units could be provided a planning condition could be used to require a proportion of self build homes to be included.

## **6.5 Affordable housing**

6.5.1 Policy H3 seeks residential development to make an appropriate contribution towards affordable housing to meet the needs of Reading. It is noted that the applicant has now offered to provide 35% on-site affordable housing, providing 90 affordable homes. This would be at a tenure split of 50:50 (Affordable Rent / Shared Ownership). The tenure split sought within the 2021 SPG differs seeking a split of at least Affordable rented accommodation at ‘Reading affordable rent’ levels - at least 62%; and Affordable home ownership (shared ownership or another product) - maximum 38%. Therefore subject to appropriate tenure types the provision of affordable housing at 35% of the overall scheme and the provision of larger family affordable homes is a material consideration of the scheme.

6.5.2 Planning Case Law confirms that an increased offer from an applicant that exceeds the policy compliant target does not in itself justify provision of a planning obligation unless it meets the tests set out in Paragraph 56 of the NPPF. Whilst it is considered that these tests can be met in line with other residential led development in the Borough, it should be emphasised that a 30% policy-compliant affordable housing provision is what should be expected from the site; and the additional 5% is not sufficient when weighed against other material considerations of the application, as set out below, to justify the grant of planning permission were other material policy considerations still unsatisfied.

## **6.6 Layout / Scale / Landscaping**

### **Within the site**

6.6.1 Section 12 of the NPPF ‘Achieving well-designed places’, reinforces the importance of good design in achieving sustainable development, by ensuring the creation of inclusive and high-quality places. Paragraph 127 of the NPPF includes the need for new design to function well and add to the quality of the surrounding area, establish a strong sense of place, and respond to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

6.6.2 NPPF Paragraph 131. sets out that “In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.” The National Planning Policy Framework therefore makes it clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve.

- 6.6.3 Local Plan Policy CC7 'Design and the Public Realm' sets out the local requirements with regard to design of new development and requires that all developments must be of high design quality that maintains and enhances the character and appearance of the area in which it is located. The aspects of design include: layout; urban structure and urban grain; landscape; density and mix; scale: height and massing; and architectural detail and materials.
- 6.6.4 Third party comments have been received which have highlighted paragraph 170 (a) of the NPPF, which states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. However, this also applies to planning policies, and the Local Plan responds to this by identifying the Major Landscape Features in policy EN13, of which the application site does not form part.
- 6.6.5 In addition, the landscape importance of much of the site was considered through the Local Plan when designating part of the site for allocation as CA1b. Landscape importance was not a matter highlighted as affecting the suitability of the CA1b site in the Housing and Economic Land Availability Assessment (HELAA, November 2017). This statement related only to the CA1b part of the site and the CA1b allocation seeks to retain golf use on the remainder of the land, but states that this is because it fulfils "an important sports and leisure function for Reading" rather than due to a specific landscape significance.
- 6.6.6. However, the golf course has an open verdant sylvan character at present. The submitted Landscape and Visual Impact assessment (LVIA) para 2.1.8 sets out that for site landscape receptor effects at operational stage there will be a moderate adverse effect on site character "considering the removal of private amenity green space" but also moderate beneficial effect on Site character "considering the retention of green space to form open space, considering the replacement tree planting and the implementation of a high quality scheme which reflects local character". However in relation to proposed layout and scale of development, which are to be determined at this stage, Officers consider it important due to the verdant character of the site and its relationship to the undeveloped land to the north that any new development here should be high quality landscape led scheme to make the most of the opportunity to enhance the site and surrounding area.
- 6.6.7 Landscaped areas are proposed within the site and the vegetative species and replacement trees proposed within the them are considered to be acceptable. However, these areas are considered to have been eroded in the submitted layout by the proposed road infrastructure and poor quality communal spaces. The current scheme is considered to have a low quality design of areas of the 'natural and semi natural open space (with informal play)' which are bordered by roads and around back gardens with little surveillance and outlook; for example areas to rear of plots 52-58, plots 161 & 162 or in the isolated enclosed corner locations; for example adjacent to plots 66 & 67. It is also not considered that the opportunity to use the existing green infrastructure to consolidate the green network link within the site has been fully utilised.
- 6.6.8 Therefore in consideration of layout and scale the development fails to create character areas within the site utilizing the relationship of building height to street width/type, and public realm to front gardens. The uniformity of the layout is considered to result in repetitious groupings of buildings throughout the site. This does not provide a significant hierarchy in relation to the built form

and separation distance between linear rows of dwellings from the units sited toward Kidmore End Road and the units sited towards the open land that abuts the northern boundary of the site. This northern boundary is also marred by the section of the main access road that runs adjacent to it, which does not respond positively to the context or character of the open land beyond within South Oxfordshire. The orientation of the individual dwellings with repetitive units shown in all orientations within the site and standard indicative design of the residential units also does not actively promote energy efficient dwellings. There are also incongruous groups of houses; such as these illustrated below, which makes the layout appear poorly designed.



- 6.6.9 As set out above the dwelling mix is considered to be acceptable and the scale and size of the buildings was considered to be appropriate in the context of surrounding development. The majority of the dwellings are 2 storey, and the inclusion of the 2 locations for three storey buildings to accommodate flatted blocks and health centre are not considered to be unacceptable in principle. However, in relation to the health centre building due to proximity of car parking areas there is very limited layoff around the flatted blocks to create meaningful landscaping resulting in a cramped form of development and poor quality public realm.
- 6.6.10 Officers have concluded that the proposed layout and indicative design of dwellings has failed to demonstrated how the development can bring forward a community of high quality buildings and attractive places to make best use of the landscaped character and potential of this site; and would fail to create a neighbourhood with its own identity and sense of place with good quality public realm with green infrastructure and landscaping contrary to Policy CC7 and paragraph 127 of the NPPF.

#### Wider Area of Landscape

- 6.6.11 Development of the application site would infill the Reading Golf Club land ownership within Reading Borough. The site at present is bounded on 2 sides by residential and community uses but the northern boundary is open to the remainder of the Golf Course land within South Oxfordshire, with the boundary of the Chilterns Area of Outstanding Natural Beauty set 1km to the North. The application has been submitted with a Landscape and Visual Impact Assessment (LVIA) as required by Policy EN13 that assesses the setting of the development on the AONB. Comments from the Chiltern Conservation Board set out that the application site falls broadly within the wider setting of the AONB and sits next to or just beyond a wider valued landscape, and concludes that there is little impact on the immediate setting of the AONB boundary, as exists.



- 6.6.12 A further representation from third parties highlights the announcement of 24<sup>th</sup> June 2021 by Natural England that it will explore a boundary extension to the Chilterns AONB. However, the Council is not aware of any further detail at this stage about how the boundary would be extended, and it in itself cannot therefore be used to determine this application. The response from the Chilterns Conservation Board agrees that direct visual effects will be minimal and promotes a sympathetic boundary treatment to the north of the site. It is not therefore considered that there is justification to refuse the application based on it being a valued landscape as set out in paragraph 170 of the NPPF.
- 6.6.13 However, the land directly adjacent to the northern boundary of the application site, where there is no physical boundary at present, is not urbanised in character. Therefore due to the proximity of the proposed main access road parallel to the northern boundary the proposed layout of the site does not allow for meaningful landscaping to ensure integration into the open landscape as it extends towards the Chilterns AONB. Housing development on the edge of Reading is characterised by much softer landscaped edges to the open land within South Oxfordshire. Officers at South Oxfordshire District Council have highlighted the proximity of the main road to the boundary, which also gives rise to potential landscape and ecological issues from light and noise pollution impacting on the open land. Para 180 of the NPPF seeks to limit the impact of light pollution on local amenity, intrinsically dark landscapes, and nature conservation. The submitted Lighting Assessment acknowledges given the scale and nature of the Proposed Development and its lighting requirements, many new sources of artificial light will be introduced to an area of low district brightness. The development will require street lighting on the spine road and whilst the level of proposed lighting could be controlled to some extent the road as an urban feature in direct proximity to the open landscape beyond is considered to have a detrimental impact on the character of the area.
- 6.6.14 Officers have concluded that the proposed layout, with the road and a number of dwellings located close to or directly adjacent to the boundary of the site, adjoining South Oxfordshire, would fail to respond positively to this local context or maintain or enhance the character and appearance of the adjacent open landscape. The proposal is not considered to be sympathetic to or make best use of the potential of the landscaped character setting for this part of the site contrary to Policy CC7 and para 217 of the NPPF.

## **6.7 Protected Trees, Ecology and Biodiversity**

### **Trees**

- 6.7.1 The site is subject to Area TPO 4/18. It is acknowledged that development of a site such as this will inevitably lead to tree removal. Officers are therefore seeking to ensure that the maximum number of higher grade trees are retained, that these trees can successfully be retained without direct harm or long-term pressure to prune; and that adequate mitigation planting is proposed. The outline proposals require the removal of 117 trees or groups of trees (130 trees in total) to allow the construction of dwellings, parking spaces and associated infrastructure. The application further states that the extensive new planting proposed (134 new trees) provides good mitigation at a better than 1:1 planting ratio. This is a net gain of 4 trees. The natural environment officers also set out that since the production of the report, two trees have failed (the southern Oak

in G294 and one Lime on the site frontage) - both will also require a replacement under the TPO.

- 6.7.2 Due to the presence of clay soil subsidence and the retention of trees was an issue that was sought to be addressed by foundation type and can be controlled by condition.

New hard standing (a proposed footpath) within the root protection area (RPA) of trees 147, 148, 149, 150 & 164 will be constructed to a 'No Dig' specification, which is considered to be acceptable.

- 6.7.3 However Officers remain significantly concerned regarding the relationship between particular dwellings and existing trees, due to the dominance of trees in gardens to some plots, e.g. plots 161-164 and shading pressure on others, e.g. plots 1, 21-24, 49, 78 & 84, both issues for plots 8-15, 59-66. Plots 8-15 includes Limes 102 103 & 315 to the south (hence shading) at current heights of 16, 16 & 19 metres respectively. There are examples within the borough where such close proximity has resulted in regular complaints and pressure to prune or fell.

- 6.7.4 In relation to the replacement tree planting on site a 1:1 ratio does not provide a net gain in tree numbers, and it is considered that the addition of less than 5 trees on a site of this size and nature could be increased. It is also noted that in relation to quantity of tree planting, the LS DAS Add supports the out-of-Borough planting as part of the overall strategy. However there are concerns that these trees are not sited within Reading Brough and long-term they will not remain as 1000 'trees', as with any planting, there will be some losses and over time the woodland would need to be selectively thinned to ensure the even development of the tree canopy.

The proposal is therefore considered to be contrary to policy EN14 and objectives of the adopted Reading Borough Council Tree Strategy (2021)

#### Ecology

- 6.7.5 As set out in the in the consultation section above the ecological survey work undertaken to inform the application (as reported in the EIA and Volume 4 Appendix G of the EIA) has in general been undertaken to an appropriate standard with detailed surveys of protected and priority species. Therefore, subject to conditions to minimise any adverse impact on wildlife during construction and to ensure that the development includes wildlife friendly landscaping and ecological enhancements, then there is no reason not to approve this application in terms of the impact on protected or priority species.

#### Biodiversity

- 6.7.6 The further information requested and submitted dated 24<sup>th</sup> May has been assessed. This consisted of an updated document named "Landscape and Ecological Management Plan & Biodiversity Impact Calculation" that shows the habitat areas that have been included in the calculations post development. The applicant's ecologists has also provided a DEFRA 2 Biodiversity Impact Assessment Calculator (BIAC) excel spreadsheet for the scheme.
- 6.7.7 The 24 May document and spreadsheet conclude that the proposals will result in a net loss of Habitat Units [Habitat Units are a factor of habitat type, condition, distinctiveness, size (area), ease of creation etc.] on site but to offset this an area of grassland to the north of the site (in the former golf course) will be

enhanced by managing it so it becomes species rich grassland. Areas of mixed scrub will also be planted in this area (see Figure 8 of the 24 May ecology report).

- 6.7.8 They also conclude that the development will result in a net gain in Hedgerow Units although there is no map showing where the existing hedgerows referred to in their calculator are or how they have reached the conclusion that the hedgerows are in the conditions that they are. An outline of the ecologist's calculations are set out in the consultee section above and advice that this is an inaccurate assessment also set out.
- 6.7.9 Having roughly digitised the extent of tree cover based on the tree survey and aerial photos the Council's Ecologist has calculated that the pre-development baseline is in the region of 67 Habitat Units. As such to deliver a net gain it is likely that a larger amount of off-site habitat enhancements (probably twice as much or more) would need to be provided. However, given that the applicant could use the golf course to the north for this it is quite likely to be achievable.
- 6.7.10 The applicant's recent letter 2<sup>nd</sup> July at paragraphs 49 and 50 reads:  
*"49. We have proposed three solutions for the proposed off-site biodiversity provision, either:*  
*• A commensurate financial contribution is paid to RBC via the S106.*  
*or*  
*• It is delivered on land within RBC's control. This approach is as set out in our earlier January 2021 LEMP and BIC submission.*  
*or*  
*• It is delivered on neighbouring land within the Golf Club's control in SODC. The Council's BAP identifies that it is acceptable to provide offset within adjacent authorities, with SODC being one of those named. This approach is as set out in our latest May 2021 LEMP and BIC submission.*  
*50. It is notable that the above net gain calculation does not take into account any biodiversity value gained by the planting of 1,000 trees."*
- 6.7.11 In relation to bullet points 1 and 2 above. There have been no formal discussions with the council about where these units would be delivered, and the "January 2021 LEMP and BIC submission" does not give any confidence that these units could be delivered on council owned land.  
Regarding bullet point 3 it may well be that a net gain in Biodiversity Units can be achieved within the golf course. However, it is likely that significantly more grassland (at least twice as much) than is currently proposed would need to be enhanced to achieve these units.

Policy EN12 states:

"On all sites, development should not result in a net loss of biodiversity and geodiversity and should provide a net gain for biodiversity wherever possible.

Development should:

protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and

Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.

In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is "no net

loss” of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats and should be provided prior to development.”

6.7.12 At present as it is shown it is not possible to provide a net gain for biodiversity on site, officers have to consider if there are “exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site and it is demonstrated that the impacts can be avoided, mitigated or compensated for on site then off site compensation is applicable. In this case it is not considered that the need for development clearly outweighs the need to protect the value of this substantial area of open space while an alternative layout could provide on site compensation. Therefore the outline proposal is not considered to comply with Policy EN12 and the Reading Biodiversity Action Plan (2021).

## **6.8 Transport**

6.8.1 The comments are set out in detail in the consultee section above and officers are aware that detailed matters were raised by other authorities and third parties.

### *Proposed Means of Access*

6.8.2 In relation to means of access the primary vehicular access serving the residential accommodation will be located on the eastern boundary of the site from Kidmore End Road, in a similar location to where the existing car park access to the Golf Club is located. In terms of design, the layout of the primary access serving the residential accommodation is acceptable and complies with adopted policy.

6.8.3 The secondary access to the health centre and apartments above it is also considered to be acceptable.

6.8.4 A concept layout for an improved bus stop design with shelter and levelled access has been submitted and is a matter that can be dealt with by condition.

6.8.5 Tracking diagrams have been submitted and are considered to be acceptable. A Delivery and Servicing Plan is also required for use of the health centre, but this can be dealt with by condition.

6.8.6 There is no vehicle access to the land to the north of the development site and the internal track will be removed as per the proposed site layout. Land to the north of the development site within South Oxfordshire administrative area will be accessed via Tanners Lane. Therefore, all the traffic associated with the leisure uses to the north of the site will be directed to the road network in South Oxfordshire.

6.8.7 Local Plan Policy CC6 states

*“The scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations. Unless it can be demonstrated that the accessibility of a site is to be significantly upgraded, for example, by providing high quality pedestrian routes or providing access to good public transport services, any new*

*development must be at a scale, density and intensity appropriate to that level of accessibility.”*

- 6.8.8 To improve pedestrian facilities in the local area, a raised informal crossing, comprising a flat-top speed hump with a Duratherm herringbone imprint, is proposed on Kidmore End Road, Lyefield Court at its junction with Kidmore End Road, and on Grove Road at its junction with Kidmore End Road. The alternative route avoids the narrowing, taking people to the other side of Kidmore End Road where the footpath is wider.
- 6.8.9 The Institute of Highways and Transportation’s (IHT’s) guidance, Guidelines for Providing for Journeys on Foot (2000) asserts that the pedestrian routes should be designed so that the walking distance along the footpath system to the bus stops should not be more than 400m from the furthest houses (approx. 5 min walk). Whilst it is desirable to provide bus stops within 400m, it is recognized that people are prepared to walk much further. In relation to travel to public transport, the WYG document ‘How far do people Walk?’ identifies greater distances of 800m as acceptable distances to bus services which equates to approx. 10 min walk.
- 6.8.10 The Transport Assessment states that pedestrian and cycle links can be extended from the northern end of the site, connecting to the traffic free cycle route NCN 5 to the north, as shown in Figure 6.1 within the Transport Assessment. These do not form part of this application (redline area) but would provide enhanced accessibility to/from the site for pedestrians and cyclists. The applicant has agreed to the provision of pedestrian and cycle links prior to commencement of development and will accept a planning condition to satisfactorily control this matter to deliver a foot/cycle route from the northern edge of the proposed development to NCN5. Details of the construction of any hard-surfaced pathways should be conditioned to ensure they are suitable for users including pedestrians, cyclists, and disabled users and will be subject to consideration by South Oxfordshire District Council.
- 6.8.11 The proposal on balance is therefore consider to accord with Policy CC6 and TR1 subject to a contribution to secure bus provision.
- 6.8.12 **Internal Layout** : Manual for Streets (MfS) is expected to be used predominantly for the design, construction, adoption and maintenance of new residential streets. Long, straight streets with good forward visibility can lead to higher speeds, therefore, one way working / give-way build outs are indicatively shown on the updated masterplan (Appendix A) as further traffic calming features. The build outs are distanced greater than 70m apart as they will work in conjunction with the meandering street, junctions and driveways/frontage to slow traffic. They have been placed between junctions, and driveways at suitable locations and achieve 20mph MfS forward visibility. Full details will be designed through Reserved Matters which is acceptable to the Highway Authority.
- 6.8.13 **Parking & Cycle Parking** : Policy TR5 of the Local Plan states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. It is important that enough parking is provided so that there is not a knock-on effect on the safety and function of the highway through on-street parking.

Car and cycle parking are considered to be acceptable subject to condition and the provision of a car club for a period of 5 years.

6.8.14 **Person Trip Analysis:** The Trip Rate Information Computer System (TRICS) database has been used to calculate the proposed trip rate and subsequent trip generation for the proposed residential development. TRICS survey data is used to analyse individual or selected sets of survey counts to produce trip rate information based on user-defined development scenarios. The results provide an estimate of the likely activity at a development, and it is widely used by both transport planning consultants and local authorities. As set out in the detailed comments above the Highway Authority are satisfied that the vehicle trips identified by the applicant are a robust assessment of the proposed development.

6.8.15 **Highway Impact:** The Highway Authority are aware that residents have identified road works that took place at the time of the traffic counts and have advised that these would have affected the results of the survey undertaken. It is noted that the road works took place between 26<sup>th</sup> June 2019 and Monday 1<sup>st</sup> July 2019. However, it has now been clarified by the applicant that the junctions were assessed utilizing the manual classified traffic counts which took place on 25<sup>th</sup> June 2019 which would be prior to any road works taking place.

As stated above the ATC survey data does not fundamentally change during the assessment period either before or after the installation of the roadworks and the MTC surveys have been assessed against the ATC data and have identified that they are comparable against one another. It should be stated that in some cases the MTC data does represent an increased traffic flow and therefore the assessment of the development is robust.

The Highway Authority therefore have no planning grounds to dispute the survey results undertaken by the applicant as they comply with the DfT standards for traffic surveys.

6.8.16 Detailed assessments of road junctions were undertaken and are considered to be acceptable subject to the required improvement to be secured via S106 Agreement. However a single reason for refusal relates to the impacts of the Peppard Road/ Kiln Road / Caversham Park Road not being mitigated as the applicant would have to do further assessment work to establish that any improvements put forward do mitigate the development prior to any works being specified being include within a S106 Legal agreement. The scheme therefore fails to propose any improvement to this junction to mitigate the impact of the development contrary to Local Plan Policies TR3.

6.8.17 **Off-Site Highway Works** These seek to proposed pedestrian improvements and traffic calming measures. In principle, the proposed pedestrian priority measures are acceptable subject to a Stage 1 Road Safety Audit being undertaken. The works will be secured through the S106 process and a highway agreement will need to be entered into for works undertaken on the public highway.

6.8.18 **Construction** The applicant should be aware that there would be significant transport implications constructing the proposed development within the existing urban area of Reading. 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. Therefore, any full application would be conditioned to ensure a Construction Method Statement is submitted and approved before any works commence on-site to regulate the amenity effects of construction. As well as demonstrating a commitment to ensuring the number of HGV movements are managed and controlled, the CMS must demonstrate that appropriate measures will be implemented to ensure the safety of pedestrians and cyclists on the road network around the construction site.

## **6.9 Impact on residential amenity**

### Existing Residential Properties

- 6.9.1 As set out above the layout and scale of development are for consideration at this stage. The existing properties to be impacted by the proposed built form of the development are the dwellings that adjoin the site. The layout allows predominately back to back relationships with adjoining residential plots and these back to back distances meet a minimum of 20 metres to ensure that adequate levels of privacy are provided within the new development. Due to this relationship between the proposed dwellings and neighbouring properties it is not considered that the development will have an adverse impact on neighbours in terms of loss of light and privacy in accordance with Policy CC8 'Safeguarding amenity'. Harm to outlook from the rear of existing dwellings and increased lighting within the site will be significantly altered but due to the back to back distances created within the site this not considered to cause significant harm to residential amenity to be a reason for refusal of planning permission. It is noted that dwellings on the Kidmore End Road frontage and Lyfield Court do not have a back to back relationship with the proposed development but adequate separation distances are also achieved to these dwellings. The proposed health centre building and other flatted block although up to 3 stories are set with the site, and the scale of these buildings is not considered to have an adverse impact on existing dwellings.

### Future residents

- 6.9.2 Policy H5 provides a series of standards which all new build housing should be built to with Policy H10 requiring dwellings to be provided with functional private or communal outdoor space. Policy CC8 also stipulates a number of factors that new residential developments should be considered against. As indicated by the scale of the dwellings and indicative floor layout provided officers are satisfied that the dwellings as specified can achieve the minimum areas for different sizes and types of dwellings, as set out in nationally described space standard, referred to in Policy H5. Amenity space sizes can also be provided in line with Policy H10 for flatted units as the provision of balconies and some communal space is accepted, and the final appearance of the dwellings is to be determined at the reserved matters stage. However, in relation to a number of individual dwellings although the quantum of space is acceptable the presence of retained mature trees in rear gardens is considered to reduce their functionality through over shadowing and could give rise to concerns with safety for future residents contrary to Policy H10.
- 6.9.3 The layout also demonstrates that the relationship of dwellings within the site to each other is satisfactory to ensure that dwellings have adequate privacy, light visual dominance, or harm to outlook. Crime and the fear of crime also have a major impact on quality of life and the wellbeing of a building occupants.

Enabling occupants to feel safe and secure is therefore essential to successful, sustainable communities and is supported by Policy CC7 'Design and the public realm'. Comments from the Crime Prevention Design Advisor have been noted in relation to built structures and in relation to the apartment blocks matters in relation to internal layout can be resolved at a reserved matter stage to adhere to 'Secure by Design' principles.

- 6.9.4 The form and operation of the Heath Care Centre subject conditions in relation to hours of use and any plant required is not considered to cause significant harm to residential amenity of existing and future occupiers. The proposal is considered to satisfactorily accord with Policy EN17 and CC8.
- 6.9.5 The applicant has submitted a Superfast Broadband Strategy Statement. It sets out there are a range of potential options for delivering superfast broadband to the application site at this stage. The Statement has focussed on BT Openreach, Vodafone, Talk Talk and Sky as the best-placed companies to provide this key communications utility to the Site, as they are already active in the Reading area. This is considered acceptable at outline stage.

#### **6.10 Pollution / Water Resources / SUDS**

- 6.10.1 Policy EN15 'Air quality' and EN16 'Pollution and Water resources' will only permit development where mitigation measures to ensure that developments do not have an adverse effect on air quality; land, noise and light pollution; and water resources. Detailed comments from the Council's Environmental Health Officers are set out above, which assess the differing impact at construction and then operational phase - once a development is completed. In relation to matters of air quality and it is considered that subject to robust conditions and that the contribution is secured to introduce a smarter signal operating scheme at the Henley Road/Prospect Street/Peppard Road junction with the aim of improving the traffic flow thereby improving Air Quality that this impact can be suitably mitigated.
- 6.10.2 In relation to noise which during the construction and demolition phase will have an adverse impact on the nearest noise sensitive receptors, even with mitigation in place. This has been assessed as a minor to moderate adverse effect with mitigation in place. Therefore it is necessary for the developer to follow Best Practicable Means to minimise the impact during construction & demolition - this can be secured by condition to ensure that the specific measures to be implemented are submitted and approved prior to works commencing within a Construction Method Statement. The applicant would also be expected to submit a S61 (Control of Pollution Act 1974) which will mean that they will have to follow best practice to control the noise and vibration.
- 6.10.3 Officers would also seek that a developer liaise with the adjacent Emmer Green Primary school and residents about issues and particular noisy/ dusty works and seek to offer quiet periods in the day taking into account the school day. These matters can be included with a S61 as set out above.
- 6.10.4 For the operational phase, the assessment indicates that a good internal noise environment can be achieved using appropriate glazing and sound insulation for walls and ventilation which could be conditioned, and further secured at



reserved matters stage in relation to appeared. Acceptable noise level rating for all plant must adhere to can also be controlled by condition.

- 6.10.5 In relation to Contamination officers has considered the details submitted with the application and has recommended that condition that can satisfactorily safeguard the amenity of existing and future occupiers.
- 6.10.6 Policy EN18 considers matters of Flooding and Drainage. In relation to water resources the comments of the Environment Agency and Thames Water are set out in detail above which raise no objection to the proposals and see no further technical studies. Thames water confirm the scale of the proposed development does not materially affect the sewer network and as such they have no objection. Also, as the application indicates that surface water will not be discharged to the public network, they have no objection, subject to approval from the Lead Local Flood Authority as set out below. Thames Water so set out that they have been unable to determine the waste water infrastructure needs of this application but consider that this matter can be dealt with by condition. It is also noted that Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal but also consider that this could be dealt with by condition.
- 6.10.7 Third party comments in relation to water and drainage are noted, ground water contamination has been assessed Contamination Risk Assessment February 2019 (Volume 4, Appendix F) and the GeoEnvironmental Assessment produced by IDOM in November 2019 including infiltration testing results and land quality. The application also contains a Flood Risk Assessment and SuDS Strategy (Volume 4, Appendix D).
- 6.10.8 In relation Flooding the application site is located within Flood Zone 1 classified with a Low Probability of flooding from rivers and the sea. It is noted that the surface water run-off from the proposed development will need to be managed; and the SuDS Strategy for the site proposes four infiltration basins proposed to be located in the northern half of the site and the inclusion of permeable paving in appropriate areas.  
The comments from the lead Flood Authority as are set out above and confirm that subject to condition the submitted.

The proposal is therefore considered to accord with Policies EN15, EN16 & EN18.

## 6.11 Sustainable Development

- 6.11.1 Local Plan Policy H5 'Standards for New Housing' seeks that all new-build housing is built to high design standards. In particular, new housing should adhere to national prescribed space standards, water efficiency standards more than the Building Regulations, zero carbon homes standards (for major schemes), and provide at least 5% of dwellings as wheelchair user units. Policy CC2 (Sustainable Design and Construction) and Policy CC3 (Adaption to Climate Change) seeks that development proposals incorporate measures which take account of climate change. Policy CC4 (Decentralised Energy) seeks that developments of more than 20 dwellings should consider the inclusion of combined heat and power plant (CHP) or other form of decentralised energy provision.
- 6.11.2 The Energy and Sustainability Strategy document submitted with this planning application seeks to set out how the proposed development will comply with

current standards for energy use, including the use of renewable energy. The information as submitted includes reference to very limited use of solar and air source heat pumps; and is not considered to provide adequate justification of decentralised energy not being provided. Additionally the amount of solar PV proposed is very low.

- 6.11.3 Clarity is all in relation to the level of carbon reduction sought from the scheme. From examining the proposals provided from the Energy strategy and the matters for consideration, the development was aiming to achieve a 43% reduction in carbon dioxide emissions which meets the minimum policy requirement of -35% of the 2013 part L levels and the remainder was to be purchased under the Zero Carbon Homes Fund for a value of £454k. The matters for consideration however quotes a reduction of 83% with a much lower saving of 17% (£135k). This matter will be updated at your meeting.
- 6.11.3 The Sustainability Assessment submitted with this application sets out how the proposed Health Centre will meet the requirements of BREEAM “Very Good” standard, in compliance with the relevant SPD.

## **6.12 Historic Environment / Area of Archaeological Significance**

- 6.12.1 Paragraph 129 of the NPPF requires that local planning authorities identify and assess the particular significance of any heritage asset that may be affected by a proposal.
- 6.12.2 Archaeology and Built Heritage have been considered within the submitted Environmental Statement. The Site does not lie within, or bordering, a Conservation Area, and there are no listed buildings within or adjacent to the site. Heritage Assets the wider area including listed buildings and Ancient Woodland have been assessed. Officers consider that there are therefore no likely impacts of the development on the historic settings of any designated Heritage Assets.
- 6.12.3 It noted that objections have been submitted on the basis that the site was originally designed by James Braid; that the club is a very significant part of the history of the Reading area and should be protected. As set out above the site has no national heritage designation; and is not a defined Locally Important Heritage asset and therefore cannot form a reason for refusal.
- 6.12.4 In relation to archaeology the Site has a moderate potential for archaeological deposits of later prehistoric (Bronze Age - Iron Age) and Romano-British date, a moderate potential for deposits of earlier prehistoric date, and a low potential for deposits of medieval and post-medieval date, with the exception of late post-medieval field boundaries for which the potential is high. The proposed works are likely to have a significant impact upon any surviving archaeological deposits within the Site. However as set out by Berkshire Archaeology the potential impacts can be mitigated by a programme of archaeological in accordance with a written scheme of investigation, which could be secured by way of condition.

The proposal, subject to condition to mitigate impacts on archaeology are considered to accord with local plan policy EN1 and EN2.

### **6.13 Mineral Deposits**

- 6.13.1 The application site sits on an area which is considered likely to contain deposits of sand and gravel, according to British Geological Survey mapping. Saved policy 2 from the Replacement Minerals Local Plan states that:
- 6.13.2 “The local planning authorities will oppose development proposals which would cause the sterilisation of mineral deposits on the proposed development site, or which would prejudice the future working of minerals on adjacent sites, except where it is demonstrated that:
- (i) the mineral deposit is of no commercial interest, and is unlikely to be so in the future; or
  - (ii) having regard to all relevant planning considerations, there is an overriding case in favour of allowing the proposed development to proceed without the prior extraction of the mineral; or
  - (iii) extraction of the mineral would be subject to such strong environmental or other objection that it would be highly unlikely that it would ever be permitted in any circumstances.”
- 6.13.3 This development would represent a sterilisation of mineral deposits on the site. A Minerals Resource Assessment and further response letter (dated 25/5/21) has been submitted. It is considered by officers that the as the Submission Central and Eastern Berkshire Joint Minerals and Waste Plan (CEBJMWP) is now at Examination stage it has some weight. However, as Policy M2 of the CEBJMWP is similar in this regard to policy 2 of the Replacement Minerals Local Plan (RMLP), the proposal can be considered mainly under the latter.
- 6.13.4 In line with Hampshire Services comments on the preliminary Minerals Resource Assessment, officers do not consider that it has been fully shown that the development complies with criterion i of Policy 2, i.e. that the mineral deposit is of no commercial interest, and is unlikely to be so in the future, but policy 2 only requires that one of the three criteria be met, and this does not therefore lead to conflict with the policy. As the points in relation to criterion iii are general planning matters rather than technical minerals matters need further advice was not required from Hampshire Services.
- 6.13.5 Reading Borough Council Officers are satisfied that the additional information demonstrates that the sterilisation of mineral resources on the site would be acceptable in this instance under Policy 2 of the RMLP, because, in line with criterion iii of that policy, extraction of the mineral would be subject to such strong environmental or other objection that it would be highly unlikely that it would ever be permitted in any circumstances. It is agreed, as set out by the applicant that the nature of the facilities needed to undertake this extraction would be highly unlikely to be acceptable in an area closely hemmed in by residential properties on most sides, as would the amount of HGV movements such extraction would generate on residential roads. Such extraction would also result in the loss of many of the natural features within the site, including the loss of a number of protected trees, many of which would be otherwise retained. The proposal is therefore considered to be in accordance with Policy M2 of the Replacement Minerals Local Plan (RMLP).
- 6.13.6 The proposal is therefore considered to be in accordance with Policy M2 of the Replacement Minerals Local Plan (RMLP).

## **6.14 Community Facilities**

### **Proposed Healthcare Facility**

6.14.1 The development proposes the erection of 600sqm health care facility on the Kidmore End Road Frontage. As set out above although the Policy CA1b does not apply to the development this policy is an indication that additional development of the scale in the allocation, or greater, is expected to need to be supported by improvements in healthcare provision. The provision of a health centre would deliver new facilities in line with Local Plan Policy OU1 and is supported in principle. However, concerns have been raised in relation to whether the proposed building would meet the requirements of local practices and the Clinical Commissioning Group. No comments have been received at the time of writing. Therefore it is considered that this community facilities it can be treated as a limited community benefit in terms of the planning balance in determining the application. The LPA would need to ensure that fallback position if the facility is not taken up, e.g. a financial contribution to improvements elsewhere in the Emmer Green area, and there would need to be some understanding of how else the facility, or the land on which it sits, would be used. The applicant has offered as part of the S106 package set out the S106 section below however this has not been secured at this time.

6.14.2 Further consideration of education to be updated at your meeting.

## **6.15 S106 / CIL**

6.15.1 In relation to the community infrastructure levy, the applicant has duly completed a CIL liability form with the submission. Based on the 2021 residential CIL rate of £156.71 per square metre the current broad estimate is £3,820,433. However, under the current scheme to provide onsite affordable housing the applicant could qualify for a reduction to the levy based on the affordable housing floor area being deducted at a later date.

6.15.2 Policy CC9 'Securing Infrastructure' sets out that Proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time

Therefore were Members minded not to agree with the officer recommendation and decide to grant planning permission for the proposed development there are a number of obligations that the applicant would be required to commit to through the completion of a S106 legal agreement. The heads of terms agreed would include:

1. Provision of 35% on-site Affordable Housing at a tenure split to be agreed.
2. Provision of a 600 sqm health centre or a commensurate sum towards off-site provision.
3. A contribution of £100,000 to either be paid into Cucumber Wood Park Management Ltd or secured via separate legal agreement under s.33 of the Local Government (Miscellaneous Provisions) Act 1982 to manage and maintain

woodland planting, allotment provision, open spaces and footpaths and cycleways on land within the Golf Course in South Oxfordshire over 20 years.

4. A contribution to the Carbon Offset Levy to comply with Policy H5. Sum to be agreed
5. A contribution of £10,000 towards off-site biodiversity planting and ongoing management and maintenance.
6. A contribution of £250,000 towards provision of 3G sports pitch provision, as per Sport England request.
7. A contribution of £50,000 towards upgrade of Emmer Green Playing Fields Play Equipment.
8. A contribution to Employment, Skills and Training of £62,470 (Band 9), based on a construction value of £76.8 million.
9. A contribution of £10,000 to assist funding of a local Car Club provider and provision of two on-site car club spaces.
10. A contribution of £5,000 towards provision of an on-site Cycle Hire scheme, to be located adjacent to the Health Centre.
11. A contribution to Employment, Skills and Training monitoring of £6,134.40
12. A contribution towards S106 monitoring of £5,000
13. A contribution towards RBC Legal Costs of £10,000
14. A contribution towards provision of Public Art of £25,000
15. Off-site highways works and improvements, comprising:
  - Improvements to Kidmore End Road Access, plus new bus shelter and levelled access - drawing number 45675/5510/001A
  - Provision of a secondary access to Kidmore End Road, including informal crossing with tactile paving - drawing number 45675/5510/003.
  - Improvements to the Kidmore End Road / Peppard Road junction - drawing number 45675/5510/006
  - Improvements to the Kidmore End Road / Lyefield Court and Kidmore End Road / Grove Road junction - drawing number 5675/5510/004
  - Upgrading the signal junction at the Peppard Road / Henley Road / Prospect Street junction to MOVA. Exact amount to be agreed during S106 negotiations and once further information from RBCs Network Management team has been provided.

The following are further provisions sought by the LPA as set out by Transport in the main report:

£50,000 towards MOVA and pedestrian cycle improvements at the Peppard Road / Henley Road/ Westfield Road junction

£50,000 a year towards the bus services serving the site for the duration of the build for a minimum of 3 years and a maximum of 5 years.

6.15.3 Officers can confirm that a planning obligation based on the above heads of terms would be compliant with regulations that state that such obligations may only constitute a reason for granting planning permission for the development if the obligation is—

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

## **6.16 Equalities Impact**

6.16.1 When determining an application for planning permission the Council is required to have regard to its obligations under the Equality Act 2010. There is no indication or evidence (including from consultation on the application) that the protected groups as identified by the Act have or will have different needs, experiences, issues, and priorities in relation to this planning application. Therefore, in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the proposed development.

## **7.0 CONCLUSION**

7.1 The application is required to be determined in accordance with the development plan unless material considerations indicate otherwise. In this instance the harmful impacts of the proposed development and the failures to meet all relevant policy requirements need to be weighed against the benefits of the proposed development. By reference to the assessment above a number of problems with the development are identified which are contrary to policies in the development plan. These include the loss of a significant area of undesignated open space without securing appropriate mitigation for the loss; that the proposed layout is not considered to provide sense of place with good quality public realm within the site or provide preserve or enhance the character and appearance of the adjacent open landscape within South Oxfordshire.

7.2 There will be other temporary impacts, such as disturbance during the demolition and construction phases for example. However, a number of these matters could be sufficiently mitigated by various measures applied by the applicant and secured by conditions and legal agreement obligations. However as set out above in particular in relation to Policy EN8 satisfactory mitigation measures have not been secured at this time.

- 7.3 This harm needs to be weighed with the benefits of the proposals. In particular, the provision of family homes with an affordable housing offer of 35 %, and a number of other infrastructure improvements as set out above to be secured via a legal agreement. This is a considerable planning benefit when set within the context of a pressing need for housing, and affordable housing, in the Borough.
- 7.4 However, the proposal would result in the loss of a significant amount of undesignated open space and resultant biodiversity where the proposed scheme is not considered to provide a high quality development with green infrastructure and landscaping to respond positively to this local context or maintain or enhance the character and appearance of the adjacent open landscape.
- 7.5 As such, officers have concluded that the conflicts with the development plan are not outweighed by the benefits of the proposal in this instance. Officers have applied a suitable planning balance when reaching this conclusion. Planning Permission is therefore recommended to be refused for the reasons as stated at the start of this report.

Case Officer: Susanna Bedford