Summary of objection issues Officer response (if there is no					
	response here, then the issue is covered in the officer Appraisal section of this committee report below).				
<ul> <li>Non compliance with adopted local plan Policy CA1B</li> <li>Proposed development includes twice as many homes and three times the amount of land used as the Local Plan allocation.</li> <li>Development should be smaller.</li> <li>Proposed development does not reflect sustainability policies in the Local Plan.</li> <li>The development would not be required until the 'long term' from 2026-2036. It is not required now (application is therefore premature).</li> <li>Not in any significant way any different to refused application 200713 and has even carried forward errors too (the description of the site, housing numbers involved, for instance)</li> <li>The area proposed is not in the Reading Borough Council agreed plan for future house building on this scale. If it does go ahead therefore there will be something very fishy going on in the Council (backhanders, etc.).</li> </ul>					
2. Housing need					
<ul> <li>Does Reading need this new housing? Reading is losing its identity and space.</li> <li>The development is not required to meet the Borough's housing targets and therefore exceeds the local plan allocation for part of the site is not a positive material consideration.</li> <li>The development should provide dwellings for Key Workers</li> <li>Town centre retail and office space is becoming obsolete and provision of homes should be focused in existing town centre buildings.</li> <li>Brownfield sites should be considered instead.</li> </ul>	Conversion of existing town centre buildings to residential is already a key part of meeting the Borough's annual housing need.				
<ul> <li>Brownfield sites should be considered instead.</li> <li>Housing density and type do not reflect the local character or the needs in terms of density and mix required in the Local Plan</li> <li>Too many 4-5 bedroom houses</li> </ul>					

- Housing will not be affordable
- Affordable housing needs to be met with no compromise
- No provision for social housing
- There is no need for this many homes in Emmer Green.

# 3. Traffic and transport

- Traffic will increase in the area as a result of the development.
- Bus service is inadequate and most people will drive rather than take public transport.
- Grove Road will be made more dangerous for pedestrians and drivers, particularly children walking to and from school.
- Gravel Hill is closed off and will not support additional vehicles.
- Kidmore End Road and Tanners Land will become more hazardous.
- Concern over traffic on Thames crossing bridges.
   Development should not be allowed unless there is a Third Thames crossing
- Proposed widening of Kidmore End Road for construction traffic would encroach on the grass verge, limiting space for pedestrians and leaving no space for social distancing/wheelchairs. Or will it be taking land from the play area?
- Proposed off site traffic measures are not adequate to mitigate impact of development. Many junctions in Caversham and central Reading are at capacity
- Inadequate on-plot parking for proposed properties
- Construction traffic will have a detrimental impact on highway safety
- Safety concerns for cyclists, especially on Kidmore End Road
- Inadequate parking in the wider area leading to more antisocial parking
- Concern about emergency services being able to cross from Reading across the river considering the increased traffic.
- Query accuracy of traffic modelling using old data.
   does not agree traffic increase on Kidmore End Road will be negligible.
- Park and Ride facility won't be used by residents
- Kidmore End Rd/Peppard Road junction safety concerns worsened with additional traffic
- Incompatible with Policy TR1 as existing roads are too narrow to accommodate new bus/cycle routes
- Policy TR4 not taken into account (cycle routes)

None is proposed by this application.

- Access at Kidmore End Road is already very dangerous for cyclists and is made worse by parked cars near the Black Horse and HGVs.
- Bottleneck near Emmer Green Park will worsen.
- Additional entrance being considered near Highdown Hill will endanger pupils at Highdown school.
- There is not enough parking in the area and residents are forced to park along busy roads.
- Major facilities require crossing the river (hospital, fire service, police, ambulance, rail station).
- Roads have already been narrowed due to installation of cycle lanes.
- The access is near landlocked roads
- No bus or cycle routes proposed meaning people will have to rely on cars
- The development is against traffic policy where Councillors and Officers have publicly stated that the traffic congestion north of the river is unacceptable.
- Too many unallocated parking spaces will encourage more cars.
- Reducing parking level by 100 spaces will lead to increased parking issues in the area.
- The application submits that trip generation characteristics over the day will be similar as for the Golf Club when in fact they are guite different as the Golf Club will be much more steady during the day and outside commuter times
- Garages may not be big enough and more parking will Garages would need to comply be required
- Linked car journeys and people having to take children to distant schools by car, adds to traffic congestion in the area
- Too many pinch-points on routes into Reading
- Emmer Green is a car-dependent area
- Installing another roundabout at the junction of Kidmore End Rd and Peppard Rd will result in 2 roundabouts and a pedestrian crossing within the space of 100 yards, causing danger.
- Bus services in Caversham reduced in 2019, Covid and traffic congestion have reduced passenger numbers further
- Traffic safety will be compromised due to the increase in domestic cats from the development.

It is not clear what this means.

This application must be considered on its individual merits. There is not an embargo on development due to traffic issues.

with the Council's standards.

Cat ownership is not considered to be a material planning consideration to this planning application.

## 4. Provision of Infrastructure

Health

- The development will increase pressure on overstretched healthcare facilities
- The proposed health care facility may not become operational
- Surgery only to be provided as a shell unit. There will be trouble staffing it.
- Would the medical centre be built first or last?

Were the Committee to resolve to grant permission, a suitable trigger point, related to the construction phasing, would be supplied.

- Will put strain on local hospitals which are already at capacity.
- Already difficult to secure an appointment with the local GPs. Area is struggling after the closure of the Peppard Road and Priory Avenue surgeries. How will surgeries deal with influx of new patients while addressing post-pandemic backlog?

#### Education:

- Local schools are at capacity/over subscribed.
- Build a secondary school on the golf club instead
- Class sizes are already too large for good education.

Other:

- Before planning approval is given or the Reserved Matters approved, the details of the reserved matters need to be known by the community, especially the community requirements, schools and the affordable housing.
- Until there is enough school capacity year after year, until police can investigate every crime, until everybody can get a doctor's appointment inside two weeks, until all the brownfield sites are developed and until RBC's environmental obligations are met, it does not have a moral right to even look at a proposal like this.
- Additional strain on policing.
- We have seen the consequences of financial awards being given to councils/local authorities before: The Bugs Bottom development where neither school nor health facility was ever realised beyond the drawing on the plans.
- Infrastructure to support development is not in place.

This is not required on the site by the adopted Local Plan.

The consideration of this
Outline planning application
considers the in-principle
aspects and sets out what
matters are for consideration
now and what will be reserved
for later approval. The matters
listed are for consideration now.

The Local Planning Authority cannot put an embargo on development; nor can it stop planning applications being submitted or considered.

Not a planning matter.

Facilities for other developments were considered appropriate in those instances and such considerations are not relevant to the consideration of this planning application

Local shops are already crowded (particularly with The adopted local plan allocation CA1b does not include Covid-19 measures such as queuing in place). a shop on this site. The proposal should include a shop. Lack of local shop will increase car journeys. 5. Impact on the character of the area The adopted local plan The site should be turned into a country park or allocation CA1b does not include a community forest. this on this site. The proposal is not in keeping with the low density character of the area due to the proposed density and inclusion of 3 storey health centre with flats above. House heights should be controlled by condition. Garden sizes are substandard and this is not characteristic of the area. Communal space for the flats is Lack of communal space for the flats could lead to considered to be suitable. antisocial behaviour. No discernible change in the layout of the housing development, so it should attract similar concerns as the previous application. Does not reflect rural countryside character of the Does not reflect village-feel of the area. Golf course is a vital green space which prevents Emmer Green from extending into the Green Belt of South Oxfordshire. Council rejected the similar Gladman application at Each planning application must Emmer Green, so there is no justification for this. be considered on its individual planning merits. Should fully utilise brownfield sites before greenfield sites. Impact on the character of Emmer Green - size of the proposed development is out of proportion to recent local development. Does not want low-density housing in the area. Developer should be encouraged to consider a smaller The local plan allocation is development with fewer houses. relevant. Development considered to be aesthetically Not clear what this comment displeasing. refers to. 6. Landscape and open space The golf course provides a green buffer to the AONB This application has less green space than the last one.

- Loss of green space will have detrimental impacts on mental health and exercise.
- Existing footpaths and rights of way are valued by local people.
- The site is a quiet semi-rural amenity landscape its topography should be categorised as 'high value' but the supporting documents underestimate the landscape value of the site.
- Not clear who will manage the green spaces and therefore who it will be accessible to.
- No continuous green space within the development.
- The site is defined in the Local Plan as Undesignated Open Space, and although in private ownership this does not devalue its landscape quality which is visual amenity to the large local community.
- The density of housing will lead to large scale erosion of the open space.
- Policy CA1B states that 'Areas of landscape importance will be preserved, including the edge of the Chilterns AONB'.
- The proposed open space within a country park is within South Oxfordshire.
- The site owner has made submissions to the SODC Local Plan for this land to be allocated for other development.
- Concern for harm to Green Belt
- There has to be a northern limit to the built up area; i.e. where it is now.
- Golfing reviews describe the present Course as having a pleasant parkland setting. This would be lost.
- Areas in the development described as 'amenity' unclear what this refers to.
- The application mentions a large, open, public space, but the large area of 'open space'/country park is in South Oxfordshire and around ½ a mile from the access point to the site off Kidmore End Road. The proposal has also made submissions to SODC to have this 'open space' included in their Local Plan and this shows that the Golf Club has no intention of retaining this land as open space in the long term.
- Preference for the park [assume this means the golf course] to become a SANG (Suitable Alternative Natural Green Space)
- Community should be able to buy land for green space as an asset of community value.

This does not accord with the adopted local plan allocation CA1b.

ACV is separate to the planning consideration. Land ownership is not usually a relevant planning consideration.

#### 7. Impact on trees

Many trees are protected by TPOs.

•	Ancient woodland will be destroyed.	This is a specific term. There are not Ancient Woodlands
•	Development should include retention of more of the existing trees.  Proximity of proposed dwellings may cause risk to existing and proposed trees.  Planting of saplings will not compensate for loss of mature tree canopy cover in the short or medium term.  Historic trees will be removed.  Removing trees and replacing them does not correctly mitigate for carbon dioxide capture.  The trees within the site are covered by a Tree Preservation Order, the 'like-for-like' replacement is not of benefit to the site.  The planting of 1000 trees in Oxfordshire does not increase tree cover in Reading Borough in line with the RBC Tree Strategy.	within the application site.
•	8. Ecology	
	The green link required by Policy CA1b is not provided. Proposal will harm existing habitats. Development will put pressure on nearby Area of Identified Biodiversity Interest. Detrimental impact to habitat of bats, birds including kites and badgers. Thriving House Sparrow populations in the area would be putt at risk (a Red List species). Site offers no Biodiversity net gain. Concerned that the ecological metrics will obscure the fact that the development will not actually secure an overall biodiversity net gain. Light levels from the site will have an adverse effect on nocturnal wildlife Concern for fragmentation of the land into fenced gardens will not allow the same ecosystems The golf club should be retained and 're-wilded' as in Brighton.	
9. Wat	er supply and drainage	
•	Drainage within the site is poor and flood risk worsening by tree removal has not been assessed.  There will be reduced soak away for rainwater Application does not address drainage issues in the area.  Increased run-off from new roads and pavements Local drainage already inadequate resulting in frequent flooding.	

- Primary aquifers underground not taken into account.
- It is well known that the Golf Club's land is regularly waterlogged and has also suffered plenty of sinkholes
- The soil has high clay content which will worsen flooding effects
- No risk assessment from the Environment Agency or Thames Water has been provided.

Not clear what this is referring to, but the application is accompanied by a Flood Risk Assessment and a SUDS strategy.

## 10. Construction impacts

- Increase in traffic movements will have a detrimental impact due to noise and vibration.
- Visual impact of hoarding around whole site during construction process (stated to be up to 5 years)

Dust pollution impact especially on children

- Concern over proximity to Emmer Green Primary for children's safety and noise pollution during school hours
- The construction period would be protracted and the approach would take 30 years for the little remaining open space to recover to maturity.
- Dust from the construction will negatively impact the health of local pupils and school staff.
- Construction will be a health hazard for the elderly and sheltered housing facility.
- Questions whether the development [assume this relates to construction] be able to cope with potential Covid regulations.
- Construction traffic damage to road surfaces.
- HGV vibration impact on cottages in Kidmore End Road.

This concern would be true of any development site and is not a reason to withhold planning permission

# 11. Neighbour amenity

Approximately 50 existing buildings [dwellings?] have views over the golf course which will be detrimentally affected

No landowner has a right to a view under the Planning Acts. Preservation of a view is not therefore a material planning consideration.

- For the residents of Lyefield Court and The Conifers (retirement estate) there will be a negative impact on residents here who purchased for the peace and tranquillity of the area.
- Existing footpaths and rights of way are well used by local people.
- In order to get more taxes, you are prepared to make Collection of taxes is not a current residents' lives unbearable.

material planning consideration.

 If the Council can reject an individual's planning application on grounds of neighbour's amenity, then how can the major inconvenience of neighbours be overlooked?

Each planning application (whether a householder planning application or a large Outline planning application such as this) would need to be suitable on its own planning merits to be recommended for planning permission.

- Noise will increase.
- Negative economic amenity on surrounding residents. Not clear what this refers to,

Not clear what this refers to, but if this means suppression of land values, this is not a material planning consideration.

# 12. Air quality

- Air quality in the area would worsen as a result of the development.
- Proposal contradicts the Council's declaration of a Climate Emergency.
- Removing trees contributes to climate change and extinction.
- Detrimental impact on air quality in relation to nitrogen dioxide emissions
- Removal of mature trees and inadequate planting of new trees will not serve as mitigation for the scheme or provide the same level of CO2 absorption as existing
- The site acts a 'green lung' for the local area which will be lost if the site is developed.
- pollution from demolition will detrimentally affect nearby residents and school children.
- The levels of nitrogen dioxide at Prospect Street and Caversham Road, both of which would be adversely affected by increase in traffic from the development, are already at or above the objective/limit values and the impact on the health of those residents will be worsened, e.g. asthma.
- Queries compatibility of construction with climate emergency policy.
- Pollution levels are already excessive, with the Thames Valley having the highest asthma rates outside of London.

#### 13. Impact on leisure facilities

- Does not consider that golf course is surplus to requirements.
- Questions whether golf provision in SODC is a superior offer
- Disputes whether Reading Golf Club is in financial difficulties

- The club building with the site is used by the local community as an events venue e.g. hosts local clubs. This function will be lost.
- Questions how golf provision can be secured in the future as Caversham Heath is a private club that could also be put up for sale.
- Youth activities in the area such as cubs and scouts are oversubscribed.
- Informal access to dog-walkers on golf course will not be replaced in anything like an accessible location
- Alternative golfing provision proposed is much more distant to the Reading population, contrary to the LP aims.
- Policy RL6 not met
- Considers that the proposed recreation facilities are likely to be unviable too.
- Local social cohesion will be harmed.
- There are not activities for families or young people.
- They are in fact altering the SODC area to a 9- hole par 3 course & a footgolf area.
- Inadequate playground provision in the development.

Community function noted, but this is secondary to the primary leisure use of the site.

Not clear what this objection is referring to.

# 14. Heritage matters

- A Golf club has been on the site since 1910 so is considered to be significant part of the history of Reading
- The archaeology report is not sufficient.
- Policies EN1, EN2 and EN4 have not been taken into account

The golf club is not considered to be a (non-designated) Heritage Asset.

## 15. Impacts on South Oxfordshire

- The application site would result in further pressure to develop the adjacent land within South Oxfordshire.
- The landscape and open space facilities sought to be provided in South Oxfordshire are not firm commitments and should not be relied on.
- Query population numbers generated by the development, consider they are higher and therefore the impact on infrastructure would be worse.
- Development in the SODC area does not meet the SODC local plan.
- Brochures seen indicate various options which build on this proposal, to then expand housing provision beyond into S Oxon. This application, if approved, would therefore set an undesirable precedent.

Precedent is not a material planning consideration. Each planning application must be considered on its merits and no planning application should be pre-judged.

- Many developments are being approved on the border with Reading Borough and this will exacerbate infrastructure issues and worsen traffic.
- Developers are pursuing SODC to have adjacent land allocated as well.
- Concern for impact on The Chilterns AONB.

# 16. Concerns with the Environmental Statement (statement required under the Environmental Impact Assessment Regulations)

- Chapter 4 of the ES Alternative sites: clearly no alternative sites have been properly considered.
- Dispute 'beneficial' effect on contextual land cover (chapter 14 of the ES)
- Inaccuracies/concerns with Traffic and Transport Chapter of the ES:
- weak methodology (e.g. basing assessments primarily on 18-hour averages of traffic flow; regarding each increment in flow as negligible unless it is the one that actually takes a road over capacity);
- basic errors in arithmetic (e.g. a 39% impact on Kidmore End Road when their data shows an increase from 2574 to 4245 units, i.e 65%); and
- unrepresentative input data (e.g. their traffic counts were done at a time of roadworks);
- questionable assumptions (e.g. basing predictions on 485 cars not allowing for the additional 77 communal parking spaces for flats; assuming that children will walk to Emmer Green school when that school is already at capacity from within catchment and many children will therefore have to be driven to other schools);
- only partial consideration of the impacts of other developments. Table 8.12 considers only committed developments within Reading; it excludes other pending applications within Reading, and most importantly, both committed and pending developments in South Oxfordshire which are feeding more and more traffic onto the Peppard Road and the two river crossings into Reading and to Reading Station.
  - Electric construction plant and other such systems to remove the impact of the development: the application is a token gesture at best in terms of credible environmental design.
  - Inconsistencies in the numbers of housing, traffic in the development in the documents. Likely that these inconsistencies follow through in the assessed data, traffic and transport, ES etc, therefore invalidating the results and credibility of the proposal.
  - ES Chapter 8 Construction- The Plant and equipment used during the construction phase does not represent the actual levels of plant that will be on site, as the site is a rolling programme of

- construction, then the stage of works does not align. This is an underestimation of the impacts.
- Working hours (Chapter 5 ES): this is a proposed construction of a housing development; there is no reason that there should be any construction works outside of core hours. There is nothing to be constructed on site that requires extended working hours such as large scale concrete pours or piling. Therefore the various assessments on traffic and transport are not a true representation of what will happen and should be accurately re-assessed.
- ES Chapter 8: construction vehicle numbers seem to be artificially restrained and are lower than you would expect for a development and programme of this size.
- Questions how HGV movements can be outside of peak hours.
- No mention of a construction traffic management plan, it seems to be buried in the CEMP.
- Alternative construction vehicle routes do not appear to be practicable as they do not remove the use of sensitive roads and road junctions, e.g the regularly congested junction at Clayfield Copse and Kiln Lane.
- The route along Kidmore End Road route is not suitable for HGV traffic with narrow pavements and cars parked for the majority of the day on one side.
- Delivery and removal of site based non road legal construction vehicles: these are not accounted for, there seems to be little or no reference to abnormal loads and their access to the site.
- ES what about the cumulative impacts of developments in terms of CO2 emissions?
- ES Ch11 mitigation measures show an uncertain outcome in terms of mitigation and should be using the precautionary principle.
- ES ch 13 no detail about the use of renewables.. Language used re: adaptation to climate change is not firm enough.
- Does not agree with the conclusions of the visual impact assessment in terms of impacts on night-time character, landscape character, views from adjacent residential properties and roads. Some of the stated impact levels do not make sense.

A construction method statement could require this, as necessary.

## 17. Sustainability

- This is not a sustainable location for a housing development, given issues accessing it (e.g. traffic congestion).
- There are limited facilities in Emmer Green, e.g. shops
- Lack of local employment in Caversham will lead to residents travelling across the river for work.

- How will the sustainable recovery from the damage of this development be paid for enforced and monitored.
- Construction impacts will adversely and disproportionately affect those working from home
- Not a sustainable development. Surely in 2021 we can do better than this?
- Mental health issues will increase as a result of noise pollution.
- No significant employment growth is planned in S Oxon, meaning that this is an unsustainable site in terms of access to employment.
- The application does not go above the legal minimums in the design for environmentally sound development, the development should be targeting carbon negative best practice sustainable.
- Houses need to be carbon neutral.
- IEA guidance [assume this refers to the EIA Regulations] has been manipulated and devalued thus presenting a minimal impact. The assessment needs to be redone.
- Conflict with Agenda 21 for sustainable development.

# 18. Other matters

- This second application has been submitted hoping that residents would suffer from objection fatigue.
- Many supporters do not appear to be local, but some may gain financially from this proposal.
- Rejecting the application now does not preclude development in the future, should the arguments for and against development change.
- This application does not differ from withdrawn application 200713.
- Thames Valley Business Park should be converted to housing instead.
- Permission should be denied until the Government's planning reforms are published

Comment noted.

Location of respondents to a planning application is not generally relevant, but can be in some cases. Personal financial considerations are not relevant to the planning assessment, however.

Correct, as each application will be considered in the policy and material considerations context at the time.

Suggestion noted, but not relevant to the consideration of this planning application and TVBP is not within the Borough.

There cannot be an embargo on deciding planning applications pending changes in Government policy; planning policy is changing all the time.

- Short term monetary gain for a few people will have Concern noted, but not a negative impact on the area forever.
- Against UN's biological diversity report.
- Trust between local people and the Council was lost during the Bugs Bottom development
- Loss of income or a vacant site does not justify this development
- Asks where young people will spend their time.
- Reading BC needs to bar the golf club from submitting any plans for several years.
- No public consultation was undertaken prior to submission of the second planning application
- Concern that RGC appear to be taking a creeping approach to development which could set a precedent and could ultimately lead to the permanent loss of green space in the area.
- Golf Club members were advised their objections could lead to expulsion from the Golf Club.
- The Golf Club should have managed their membership better in order to allow them to continue operating.
- no evidence of consultation with either SODC or Kidmore End Parish [Council?] about the proposals for the open space, country park, tree planting and allotments that the applicant is asserting as fact.
- The land is privately owned and will not be simply given to the local community, which may result in it being left to become a dumping ground for fly-tippers or other anti-social behaviour
- Concerns around increased anti-social behaviour and crime on the new development.
- Proper consultation not possible during pandemic
- Young people will be disproportionally affected
- No benefit to the local area or Peppard Wards
- The Council is just trying to generate more Council Tax.

material planning consideration.

Ecological considerations have been assessed against National and Local policy.

Comment noted. Presumably refers to comment in Infrastructure section above, response is the same. Correct, all relevant considerations must be taken into account.

The Local Planning Authority cannot prevent planning applications from being submitted.

It is correct that this was contrary to both National and Borough adopted policy.

Concern noted, but precedent is not a planning matter.

Not a planning matter.

Suki is this a good point?

Table 3: Content of Comment SUPPORT

Table 3: Content of Comment SUPPORT				
Topics for Support : COMMON	Other			
Housing Need This plan provides much needed additional housing in Emmer Green, including desperately needed Affordable Housing.				
We need more new housing as a priority, this stimulates many add on benefits to other trades and creates jobs.we must give others a chance to set up homes for their futures and family dreams. Development and expansion are our commitment towards future generations and a healthy economy.				
Could not afford to buy in the area so had to purchase elsewhere however if they build these properties then it will give me a chance to move back.				
Community Benefits: The application will be beneficial to the local community.				
New Medical Centre - much needed				
They have my support 100% they are building				
state off the art Golf Club at Cav heath which will encourage Children more to play golf and exercise				
The proposal is considered, well thought out and beneficial to many (including my own close family) who live in the local area. I fully support the planning application, and know that many that have/are complaining are only considering their own financial position, and has nothing to do with 'community' common sense.				
Public Open Space				

Much needed public space for leisure

The additional green spaces the club is proposing it would be a nice place to live. The course is not open to non members so I don't see where they are losing green spaces.

The world needs homes and houses much more than we need golf courses - I would be in favour of building on many more golf courses as golf is a dying game whereas houses are needed now more than ever.

## Design

The development has been carefully planned with expert advice and will bring a development of homes that will be very much in keeping with the area.

## Financial Benefits:

the financial benefits to the local shops pubs and restaurants. I think the positives outweigh the negative.

The sale of the land and using the proceeds of the sale to relocate Reading Golf Course to Caversham Heath is vital for the future of Reading GC. Without this sale the club probably would not have existed in 5 to 10 yrs.

Living close to the course I believe the amenities will in enhance the area