

## COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: 2<sup>nd</sup> March 2022

**Ward:** Peppard

**App No:** 211843

**Address:** Reading Golf Club, 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 scheme (C3 use to include affordable housing) and public open space at the former Reading Golf Club

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

**16 Week Target Determination Date:** 17<sup>th</sup> March 2022 Extended to 31<sup>st</sup> March 2022

### RECOMMENDATION:

Delegate to the Assistant Director of Planning, Transport and Regulatory Services to

- i) **GRANT** Outline Planning Permission, subject to conditions and satisfactory completion of a section 106 legal agreement or
- ii) Refuse Outline planning permission if the legal agreement is not completed by 31<sup>st</sup> March 2022 (unless officers on behalf of the Head of Planning, Development and Regulatory Services agree to a later date for completion of the legal agreement)

### S106 Obligations

1. Provision of 30% on-site Affordable Housing at a tenure split of 62:38 (Affordable Rent / Shared Ownership) in line with the current Affordable Housing SPD 2020. Provision of an equivalent financial contribution towards provision of off-site affordable housing should the on-site units not be provided.
2. A contribution of £550,000 towards local healthcare provision
3. A contribution of £135,000 towards carbon off-setting
4. A contribution of £557,500 towards open space and leisure facilities in Emmer Green (including £250,000 towards provision of a 3G sports pitch)
5. Provision of a Construction Phase Employment, Skills and Training Plan and monitoring of this or equivalent financial contribution towards local skills and labour training.
6. Provision of a car club and spaces for a minimum period of 5 years and a contribution of £10,000 to assist funding of a local Car Club provider

7. A contribution of £25,000 towards public art
8. A contribution of £50,000 a year (for a minimum of 3 years and a maximum of 5 years) to support bus services serving the site within the Caversham area.
9. A contribution of £50,000 to facilitate the appropriate changes at the junction of Peppard Road / Prospect Street / Henley Road / Westfield Road signalised control junction to increase capacity at the junction.
10. To enter into a highway agreement for junction improvements to the Peppard Road / Kiln Road / Caversham Park Road to mitigate the predicted increases, in accordance with the proposed mitigation scheme illustrated on Drawing 45675/5511/005 and Figure 7.1 of the TA.
11. To enter into a highway agreement to secure off-site highway works for pedestrians' improvements within the vicinity of the site as shown on concept drawing 45675/5511/004 and relocation of bus stop on Kidmore End Road as shown on concept drawing 45675/5510/001
12. To provide and manage all areas of on-site open space. Submission, approval and adherence to a maintenance and management strategy.
13. Submission, approval and adherence to a Travel Plan (including timetable for ongoing review and re-surveys)
14. A contribution towards off-site biodiversity enhancements within the local area to provide for a minimal overall 10% net gain in biodiversity

All contributions index linked from date of planning permission.

#### Conditions

1. Outline Time Limit - Reserved Matters to be submitted with 3 years
2. Outline Time Limit - Development to commence within 3 years or 2 years from date of approval of reserved matters
3. Outline Reserved Matters - Prior to commencement of development reserved matters in respect of external appearance to be submitted and approved
4. Outline Principles - Reserved Matters in respect of appearance to accord with principles shown in approved plans and documents
5. Approved Plans - Development to be carried out in accordance with the approved plans only

6. Materials - Prior to commencement of development of any dwellings details of all external materials to be used on dwellings to be submitted and approved
7. SAP Assessment Design Stage - Prior to commencement of development a design stage SAP Assessment to be submitted and approved
8. SAP Assessment As Built - Prior to first occupation an as built SAP Assessment to be submitted and approved demonstrating compliance with the approved at design stage
9. SuDS - Prior to commencement of development details of SuDS strategy, design, management and maintenance to be submitted and approved
10. SuDS - Prior to first occupation full implementation of approved SuDS strategy
11. Finished Floor Levels - Prior to commencement of development details of finished floor level compared to existing ground levels to be submitted and approved
12. Dwelling Mix - No change to approved dwelling mix without prior approval from LPA
13. Hard and Soft Landscaping Scheme - Prior to commencement of development full details of hard and soft landscaping to be submitted and approved
14. Boundary Treatments - Prior to commencement of development of any dwellings full details of boundary treatments to be submitted and approved
15. Landscape Management - Prior to commencement of development full details of management and maintenance of all landscaped areas
16. Arboricultural Method Statement - Prior to commencement of development a detailed arboricultural method statement and tree protection plan to be submitted and approved
17. Removal of Permitted Development Rights - Class A & E for all new dwellings
18. Habitat Enhancement Scheme - Prior to commencement of development a habitat enhancement scheme to be submitted and approved
19. Construction Environment Management Plan (CEMP) - Prior to commencement of development a CEMP to be submitted and approved
20. External Lighting - Prior to commencement of development of any dwellings an external lighting scheme to be submitted and approved
21. Biodiversity Impact Calculation (BIC) - Prior to commencement of development a biodiversity enhancement scheme demonstrating compliance with the approved BIC to be submitted and approved

22. Mechanical Plant - No mechanical plant to be installed until a noise assessment as been submitted and approved
23. Dwelling noise mitigation - Prior to occupation of any dwelling noise, glazing, ventilation and any other mitigation measures to be provided in full in accordance with the approved details
24. Contaminated Land Assessment - Prior to commencement of development a contaminated land assessment to be submitted and approved
25. Contaminated Land Remediation - Prior to commencement of development a contaminated land remediation scheme to be submitted and approved
26. Contaminated Land Remediation Implementation - To be implanted in accordance with approved timetable of works under condition no.25
27. Unidentified Contamination - Development to cease and investigations to take place if identified.
28. Construction Method statement (CMS) - Prior to commencement of development a CMS to be submitted and approved
29. Hours of Construction - To be as per the Council's standard hours only: 0800hrs to 1800hrs Mondays to Fridays, and 0800hrs to 1300hrs on Saturdays, and not at any time on Sundays and Bank or Statutory Holidays
30. No Burning of Waste on Site
31. Use of Roof Restricted - Flat roof areas of any new dwellings not be used as balcony, terrace or roof garden areas
32. Vehicular Access - No dwelling to be occupied until the access serving it has been provided in accordance with the approved details
33. Cycle Parking - Prior to commencement of development of any dwellings details of cycle parking for all dwellings to be submitted and approved
34. Refuse Collection - Prior to commencement of development of any dwellings details of refuse collection arrangements for all dwellings to be submitted and approved
35. Existing Access Closure - Existing accesses to be stopped up and abandoned when new accesses are brought into use
36. Maintenance of Visibility Splays - Area to be kept clear above a sightline height of 0.6m at all times

37. Electric Vehicle (EV) Charging - No dwelling to be occupied until details of EV charging scheme have been submitted and approved and active charging point provided in full on site
38. Car Park Management Plan (CPMP) - Prior to first occupation a CPMP to be submitted and approved
39. Vehicle Parking - Prior to commencement of development of any dwellings details of all vehicle parking spaces to be submitted and approved
40. Garages - All proposed garages to be kept available for parking of vehicles at all times
41. On-site Traffic Calming - Prior to commencement of development of any dwellings details of all on-site traffic calming to be submitted and approved
42. Roads to be Provided - No dwelling to be occupied until the roads/driveway serving it have been provided in accordance with the approved plans
43. Security Strategy - Prior to commencement of development of any dwellings details of a security strategy to be submitted and approved.
44. Archaeology - Prior to commencement of development implementation of a programme of archaeological work in accordance with a written scheme of investigation to be submitted and approved.
45. Play Facilities - Prior to commencement of development of any dwellings details of all on site play facilities and equipment to be submitted and approved
46. Photovoltaic Panels - Prior to commencement of development of any dwellings details of photovoltaic panels to be submitted and approved.
47. Thames Water - Foul Water - Prior to commencement details confirming either foul water network upgrades have been undertaken or that a development and infrastructure phasing plan has been agreed with Thames Water to be submitted and approved.
48. Thames Water - Water Network - Prior to first occupation details confirming all water network upgrades to accommodate the development have been carried out or that a development and infrastructure phasing plan has been agreed with Thames Water to be submitted and approved.

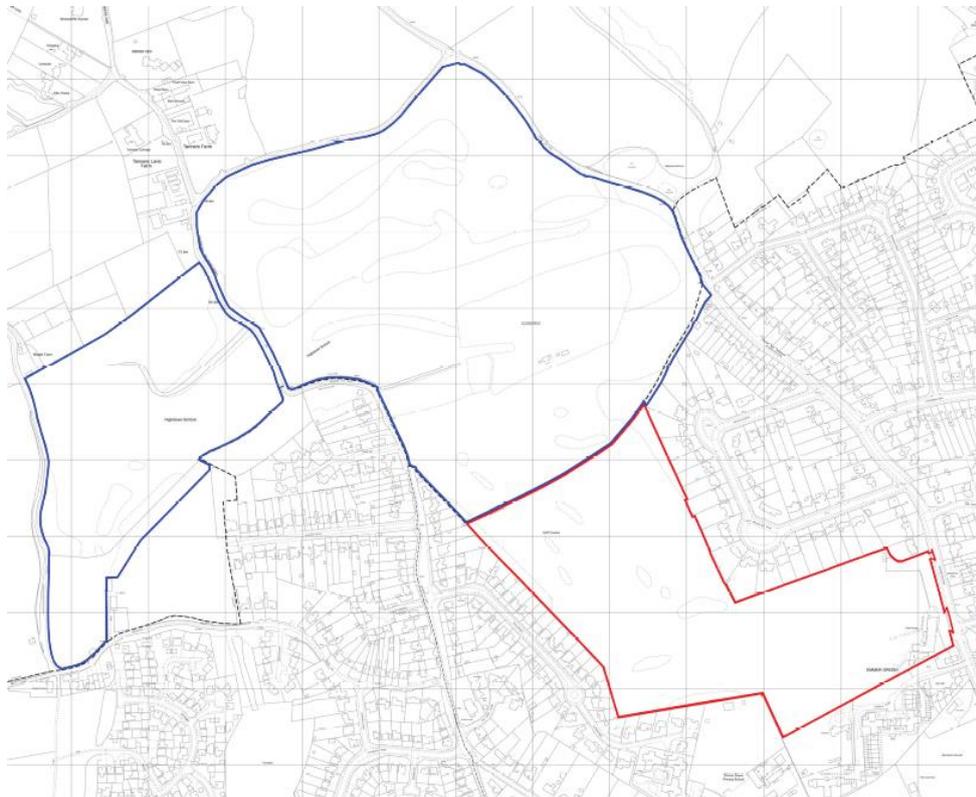
#### Informatives

1. Positive and Proactive Working - approval
2. Pre-commencement conditions information confirming agreement by applicant
3. Highways Act information
4. S106/S278 agreements relate to this application
5. Terms and conditions information
6. Building Control

7. Construction working information
8. No encroachment
9. Contaminated land information
10. CIL liable development
11. Protection of road verges information
12. Ongoing compliance conditions information
13. Access constriction information
14. Thames Water Information

## 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 site is currently vacant but consists of former holes 1 and 18 and part of holes 2, 3, 4 and 17 of the former course and facilities including 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:



*Location Plan - Red Line Area - Application Site and Land within Reading Borough. Blue Line Area - Land under the Applicants Control within South Oxfordshire District*

- 1.2 The application site is irregular in shape with the site frontage on Kidmore End Road where the site access, clubhouse and car parking area located.
- 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 Reading Golf Club is no longer operating at the site having relocated to The Caversham course, however the application site is still laid out as a golf course, with records of a golf course existing in this location for over 100 years. A shorter form family golf facility called 'The Fairways' has been set up on land to the north of the application site on part of the former course land located within South Oxfordshire District Council. This facility offers fun-orientated short game golf, foot golf and disc golf activities.
- 1.6 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.
- 1.7 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. To the north of the application site within the Applicants' ownership but within South Oxfordshire District is an Area of Ancient Woodland known as 'Cucumber Wood' whilst the Chilterns Area of Outstanding Natural Beauty (AONB) also lies approximately 1km to the north of the site.
- 1.8 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.

- 1.9 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.
- 1.10 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 with the only reserved matter 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 (as defined in paragraph 006 of The National Planning Practice Guide):

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



*Proposed Site Plan*

- 2.3 The proposal is for the demolition of the existing part one and two storey clubhouse building and the erection of up to 223 residential units (C3 use) incorporating public open space. 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). This secondary access would serve a crescent of 9 townhouses within the development only and would also provide for emergency access to the site. This access would be bollard controlled.
- 2.4 The proposed mix of residential accommodation is set out in the table below. This includes 67 affordable housing units (30%).

<b>Unit Type</b>	<b>Reading Affordable Rent</b>	<b>Affordable Home Ownership</b>	<b>Private</b>	<b>Total</b>
1 Bed flats / maisonettes	8	2	0	10
2 Bed flats / maisonettes	6	0	0	6
2 bed houses / bungalows	12	6	47	65
3 Bed houses	9	4	50	63
4 Bed houses	5	15	51	71
5 Bed houses	0	0	8	8
<b>Total number of dwellings</b>	<b>41</b>	<b>26</b>	<b>157</b>	<b>223</b>

- 2.5 The proposed residential units are predominantly individual dwellings with building heights of 2-storey to eaves level with pitched roofs. Approval of “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 and that a traditional ‘Arts and Crafts’ movement style is envisaged. An indicative schedule of materials is also provided which indicates a variety of shades of multi-red stock brick, red, grey and brown roof tiles and es of indicative appearance using a suggested house design with an ‘Arts and Crafts’ movement style. The proposed dwellings would have individual front and rear gardens, whilst the small number of flats would have access to communal garden areas.
- 2.6 The proposed development includes provision of 442 parking spaces. Each of the dwellings would have private driveway parking or garages whilst the proposed flats would be served by communal parking areas including visitor and disabled spaces. The overall proposed parking provision of the development equates to 1.98 spaces per unit.



Public Open Space	Equipped / Designated Play Area	0.16ha
	Parks and Gardens	1.01ha
	Amenity Green Space	1.33ha
	Natural and Semi-Natural	1.39ha
Public Green Space	SUDS	0.50ha
	Street Planting	0.24ha
Private Green Space	Front Garden	0.37ha
	Rear Garden	2.80ha
<b>Total Green Space</b>		<b>7.80ha</b>

Public Open Space	Equipped / Designated Play Area	0.16ha (plus informal play throughout within parks and gardens)
	Parks and Gardens	1.01ha
	Amenity Green Space	1.33ha
	Natural and Semi-Natural	1.39ha
Public Green Space	SUDS	0.50ha
	Street Planting	0.24ha
Private Green Space	Front Garden	0.37ha
	Rear Garden	2.80ha
<b>Total Green Space</b>		<b>7.80ha</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

*Proposed Green Space Provision*

- 2.7 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 provided in the form of a 0.16ha Local Equipped Area of Play (LEAP) which is located centrally within the site and surrounded by a 1.01ha Park and Garden Area, 1.33ha of Amenity Green Space and 1.39ha of Natural and Semi-Natural space. The areas of Amenity Green Space and Natural and Semi-Natural space are spread around the site in various locations but with significant provision along the eastern boundary of the site with the rear of the existing neighbouring dwellings to Brooklyn Drive. Further concentrations are also set out in linear patterns along the western site boundary with the rear of the existing neighbouring dwellings on Eric Avenue, southern site boundary with Lyefield Court, site frontage on Kidmore End Road and along the proposed central spine road into the site. A total of 3.89 ha of Public Open Space is proposed. Further areas of Public Green Space is proposed in the form of SuDs, attenuation basins (0.5ha) and street planting (0.24ha). A total of 0.74ha of Public Green Space is proposed.
- 2.8 The proposals also include provision of 3.17ha of Private Green Space in the form of front and rear gardens.
- 2.9 The application site is 12.15ha in size with 11.44ha not currently built upon. In overall terms it is proposed that 4.63ha of the site would be for open space, SuDs or street planting (38%), 3.17ha would be for private front and rear garden space (26%) so a total of 7.8ha public and private open/green space (64%). The remaining 4.35ha of the site would be development with built form and infrastructure (36%).



## LEGEND

	SITE BOUNDARY
	EXISTING TREES TO BE RETAINED
	EXISTING TREES TO BE REMOVED
	PROPOSED TREES (MEDIUM SIZE)
	PROPOSED TREES (LARGE SIZE)
	POTENTIAL LOCATIONS FOR RELOCATED MEMORIAL TREES

### *Tree Retention, Removal and Proposals Plan*

2.10 The proposals seek the removal of 112 trees, the majority of which are defined as C or U category quality, with these being replaced by 196 new medium and large trees at a ratio of 1:1.75 (a net gain of 84 trees). The proposed tree planting is spread across the site but would be prevalent along the proposed central spine road, within the central area park/garden area of public open space and on the boundaries of the site. There is no reliance on tree planting in rear gardens, but existing trees of significance would be retained within some rear gardens.

2.11 The application is a revised scheme following refusal of outline planning application ref. 210018 in August 2021 (see planning history section of this report for details of the reasons for refusal). The key differences between the current proposed development and that previously refused are as follows:

- Reduction in the overall number of dwellings proposed from 257 to 223 including a significant reduction in proportion of flats and an increase in proportion of houses.

Unit Type	Proposed Scheme	Previous Scheme
1 Bed flats / maisonettes	10 (4.5%)	32 (12.4%)
2 Bed flats / maisonettes	6 (2.7%)	26 (10.1%)
2 Bed Bungalows	3 (1.4%)	0 (0%)
2 Bed houses	62 (27.8%)	40 (15.6%)
3 Bed houses	63 (28.3%)	78 (30.4%)
4 Bed houses	71 (31.8%)	81 (31.5%)
5 Bed houses	8 (3.6%)	0 (0%)
<b>Total no. of dwellings</b>	<b>223 (100%)</b>	<b>257 (100%)</b>

- Omission of a new on-site health centre and instead provision of a financial contribution to support improvements to existing healthcare provision at Emmer Green Surgery;
- An increase in the quantum of publicly accessible open space from 4.07ha to 4.63ha; including an enlarged, continuous area of public open space to be provided along the north-eastern boundary of the site where the site backs on to properties on Brooklyn Drive,
- Increase in on-site tree planting. A net gain of 84 trees now proposed compared to a net gain of 4 trees under the previous application;
- Various revisions to site and dwelling layout including:
  - Removal of previously proposed on-site health centre and flatted development above and replacement with a crescent of no. 9 townhouses. These houses will be accessed from the secondary vehicular access proposed off Kidmore End Road.
  - Houses in the north-west corner of the site that were previously fronting onto the main spine round are now to be located off two additional courtyard access points.
  - In the north-western corner of the site, reductions to proposed public open space and SUDs attenuation areas.
  - Enlarged, continuous area of public open space to be provided along the north-eastern boundary of the site where the site backs on to properties on Brooklyn Drive, providing an overall increase in level of public open space proposed on site.
  - No residential properties are now proposed along the eastern boundary of the site.
  - Proposed provision of a green link from the site entrance to the Borough boundary through the centre of the site and along the eastern boundary, adjacent to Brooklyn Drive.
  - The secondary street proposed in the south-east of the site where it abuts the site boundary with Lyefield Court now wraps around the housing proposed, locating built form centrally, providing a further buffer to houses to the south.
  - Increased housing fronting on to the secondary route running through the central area in the northern part of the site. As a result, a small area of open space that was previously proposed has been removed and consolidated along the north-eastern boundary.
  - Consolidation of a number of smaller SUDs attenuation areas into one larger area at the north corner of the site.

### EIA Matters

- 2.12 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.

#### 2.13 Submitted drawings and documents including:

Planning drawings by Paul Hewett Architects and Pegasus Group, comprising:

- 2054-PL01 Location Plan
- 2054-PL02 Constraints Plan
- 2054-PL03 Opportunities and Parameters Plan
- 2054-PL04 Site Layout, Rev L
- 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 Context Plan
- 2054-PL09 Site Layout - Car Parking
- 2054-PL10 Site Layout - Affordable Units

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 02
- D2743 Reading Golf Club L\_103 Tree Planting Plan, Rev P03
- D2743 Reading Golf Club L\_104 Cross Sections, Rev 01
- D2743 Reading Golf Club L\_105 Key Area 1, Rev 01
- D2743 Reading Golf Club L\_106 Key Area 2, Rev 01
- D2743 Reading Golf Club L\_107 Wider Open Space, Rev 01

Tree Constraints and Protection Plans by Arbortrack Systems, comprising:

- Tree Protection Plan, Rev L
- Tree Constraints Plan, Rev F
- Zones of Influence for Retained Trees & Proposed New Planting, Rev B

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

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

Schedule of accommodation and parameters detail by Paul Hewett Architects

Design and Access Statement by Paul Hewett Architects

Landscape DAS, by Fabrik

Arboricultural and Planning Integration Report 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

Lighting Assessment by Stantec

Minerals Resource Assessment by Stantec

Planning Statement, including Affordable Housing Statement, by Pegasus Group

Planning Obligations Statement, by Pegasus Group

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

Statement of Community Involvement by BECG

Superfast Broadband Strategy Statement 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

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

Volume 3 LVIA Addendum

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

### **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 on 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 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.

- 210018OUT - 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. Refused on 2<sup>nd</sup> August 2021 for the following reasons:

1. The application site forms a significant area of Undesignated Open Space within Reading Borough. The application proposals would lead to the loss of a significant part of this space through built form and related enclosed domestic gardens, roads and driveways. The proposal fails to demonstrate 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 and that the off-site compensation arrangement is deliverable. The Layout applied for in this application proposal will therefore

lead to an unacceptable loss of undesignated open space 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;
- The poor relationship of the proposed Layout and Scale of buildings and plots would lead to likely future pressure to prune or fell retained, protected trees of high amenity value due to perceived natural ‘nuisance issues’ as a result of the lack of ‘usable’ amenity space unaffected by those retained trees; including Plots 1, 8-15, 21-24, 49, 59-66, 78 & 84 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 open space provision being fragmented and eroded by road infrastructure, often isolated and unusable due to size and shape; resulting in poor quality communal spaces;
- By building so close to the adjacent open space beyond the site boundary 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 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) of the adopted Reading Borough Local Plan (2019; paragraph 130 of the NPPF (July 2021) 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 Policy TR3 (Access, Traffic and Highways-related Matters) of the adopted Reading Borough Local Plan 2019.

4. The proposal results in a net loss of biodiversity within the site. 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 Policy EN12 (Biodiversity and the Green Network) of the adopted Reading Borough Local Plan 2019 and paragraph 180 of the National Planning Policy Framework (July 2021).

5. The proposal has failed to demonstrate that the development has been designed to incorporate measures to adapt to climate change; provide sufficient justification of the proposed decentralised energy provision and achieve zero carbon homes contrary to Policy CC3 (Adaptation to Climate Change), CC4 (Decentralised Energy), H5 (Standards for New Housing) of the adopted Reading Borough Local Plan 2019 and the adopted SPD 'Sustainable Design and Construction' 2019.

6. In the absence of a completed legal agreement to secure; the provision of Affordable Housing, a health care centre, carbon offsetting financial contribution, open space financial contributions, various transport related works (see informative 5. for details) and ecological and biodiversity mitigation; 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 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, EN8, EN9, EN12, EN15, H3, H5, TR1, TR3 and OU1 of the adopted Reading Borough Local Plan (2019), the National Planning Policy Framework (2021) 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).

### 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.

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

##### **Statutory**

4.1 Environment Agency: No objection.

4.2 Natural England: No objection

The application site is located close to a nationally designated landscape namely the Chilterns AONB. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on protected landscapes and has no objection. Advise that the proposal is determined in line with the relevant NPPF and development plan policies and that advice is obtained from the AONB or Conservation Board.

4.3 SUDS (Local Flood Authority): No objection subject to conditions.

The proposed drainage system creates drainage basins in which surface water is stored and flow to a final infiltration basin under a restricted flow. This infiltration basin would discharge the surface water at the greenfield run off rate for the site which would therefore be no worse than the existing situation. The proposed drainage system is therefore acceptable subject to conditions.

##### **Non-Statutory**

4.4 Berkshire Archaeology: No objection subject to conditions.

The site is located within 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 by way of condition, to mitigate the effects of the proposals, in line with national and local planning policy.

4.5 Chilterns Conservation Board: No objection

Recommend that the status of the wider valued landscape is given weight in any planning decision and that a landscape masterplan and management plan protect and indeed enhances the relationship between the existing site edge and the wider landscape. We note that the applicant has submitted a constraints plan and it is an important landscape consideration that these landscape boundary issues are considered. The valued landscape status, and the potential for an AONB boundary review are matters of relevance and weight can be attached.

#### 4.6 Oxfordshire County Council.

OCC Transport Development Control: No objection subject to conditions.

OCC Flood Authority: Object - further explanation of how site will manage flood risk required.

OCC 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.

#### 4.7 Sport England - Supports the application

I have consulted England Golf formally on this new planning application and they responded on the 15<sup>th</sup> December 2021 saying:

*Our position remains unchanged which includes the importance of the planned enhancements at Caversham Heath GC being delivered as originally proposed.*

England Golf are the experts in the game and Sport England gives weight on their consultation response in cases like this.

Sport England has had no communication with the applicants since before the previous planning application was refused. Having reviewed the current submission there is nothing which would alter our position from the previous two planning applications for the redevelopment of part of the golf course for housing.

Reading the planning statement, the investment into Caversham Golf Club is as follows:

- a new golf sixes/academy course;
- a new practice range;
- improvements to the club house;
- improvements to the course;

- and improvements to the chip and put greens.

The club is committed to making the game more accessible and equitable by creating space for young golfers and golfers with disabilities. The changes which have already occurred at Caversham have allowed them to secure the hosting of the English Girls Golf Championship in 2023. This shows the commitment to improving the golf offer for all ages.

We also welcome the applicant's use of Active Design as set out in the planning statement section 8.

Contributions to a much needed 3G Artificial Grass Pitch (AGP) (Para 9.134 in the planning statement) would be welcomed by the 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.

This being the case, Sport England offers its support to this application.

#### 4.8 Thames Valley Police - Crime Prevention Design Advisor

Surveillance and defensible space are an important part of deterring and detecting crime and antisocial behaviour. All properties should have surveillance over the public realm and their private property through an active room such as a living room or kitchen, avoiding blank elevations in order to maximise surveillance. Defensible space should also be provided in order to create a visual indication to the public that land/property is private.

E.g. Plots 116 and 117: adjoined properties with open space to each side of the front of the property I would recommend that windows are utilised on each property to oversee the land to the sides and that these windows are from the living room or kitchen. I also recommend that defensible space be placed in this open space in order to hinder access to windows, thus preventing crime such as burglary.

I recommend that defensible space is also placed around parking spaces as this creates a barrier and helps to prevent vehicle related crime. E.g. The parking opposite plots 215-223 require defensible space to show to the public that these spaces are private and deter theft or damage to vehicles.

##### *LEAP/Pocket Park:*

The LEAP requires careful design in relation to selection of equipment, lighting and landscaping. That the LEAP should promote ownership and enjoyment for all users as well as child safety, while deterring crime and antisocial behaviour. I urge the applicant to consider potential damage or theft of play equipment when

designing this space ensuring that equipment cannot be easily removed. It is important that the space is also visible in order to safeguard the space with surveillance from nearby properties.

It is recommended that clear sightlines from nearby properties is prioritised for safeguarding of the space. E.g. Plots 86-88 should be able to see out their front windows across onto the play area without obstruction to the view from landscaping. It is also recommended that recommend that curfew be placed on the play space with appropriate timed lighting in order to deter gathering and antisocial behaviour outside of social hours. From reviewing the DAS I note that a tree swing has been mentioned, I recommend that this be firmly secured as there is precedent for theft/damage of such items.

*Crescent development parking:*

I note that in addition to the added crescent set of terraced houses a footpath has been added to provide pedestrian access from Kidmore End Road into the houses plot numbers 215-223. By placing the footpath in this position, it encourages foot traffic past private vehicles increasing the opportunity for vehicle related crime such as theft or criminal damage. Furthermore, the landscaping in front of the houses creates a blind spot for surveillance as vehicle owners cannot overlook their vehicles from their houses.

It is recommended that defensive space be placed either side of the footpath in order to provide stand off from the parked vehicles, protecting them from damage and theft. I also recommend the redesign of landscaping to allow residents to be able to visually safeguard their property.

*Flats:*

I can see from my predecessor's notes that she made considerable comments relating to the block of flats, I am disappointed to see that it appears that limited changes have been made to the design/layout and still a lack of information regarding the following:

- Postal Services: a secure post system must be provided. We no longer recommend "through the door" deliveries and recommend that an access control/entry system does not utilise a trade's button.
- Access controls: As per previous comments I refer you to the secured by design guidance regarding access controls and reiterate that a secure access control measure must be utilised in order to prevent unauthorised access.
- Residential core: Although I can see that the applicant has attempted to make changes regarding the residential core I believe that the below highlighted door would be better placed further into the residential core.
  
- Utilities: I am pleased to see that the recommendation for smart metres has been added into plans.
- Lighting: Recommendations were made regarding internal communal lighting, that it should be 24 hours and controlled by switch with photoelectric cells in order to create a feeling of safety. I note that this is an outline plan and I would

like to see detailed plans for lighting around the development in future planning stages.

□ Cycle store: I note the addition of a second door onto the cycle store, the addition of this door compromises security as it provides more opportunity for the store to be left insecure and open to unauthorised access that could lead to theft and antisocial behaviour. It is recommended that a singular door be used for access and that the door is self-closing with electronic fob access which is only accessible by the residents of the flats.

□ CCTV: I note that there is a lack of surveillance over the parking and bike store due to the cover of trees and lack of overlooking properties. It is recommended that formal surveillance, CCTV be installed in a position that overlooks the parking area, entrance to the bike and refuse stores, and inside the bike store. This CCTV could be essential in the deterrence and detection of crime.

It is recommended that reorienting the building may mitigate surveillance issues with this block of flats. By rotating the building 90 degrees so that the Eastern Elevation becomes the Southern Elevation. This will allow better visibility of the parking area.

#### *Boundary Treatments:*

During previous consultation the applicant was given detailed advice regarding boundary treatments and garden access. Although this information is usually for reserved matters, planning of boundary treatments can have an effect on housing type, orientation, etc.

#### *Parking:*

It is recommended that defensive space be introduced around parking in order to create a barrier to prevent vehicle related crime. The accessible parking spaces appear to be located furthest from the proposed flats. It is recommended that the accessible spaces that are currently situated at the rear of the parking be moved closer to the main access to the building. This will reduce vulnerability for the users for slip and trip hazards, walking across an active route, etc.

#### *Plot 63:*

From the plans I can see that plot 63 appears to be an empty plot, there is a footpath leading down the side of plot 64 to provide access to plot 63 however there does not appear to be a residence. I request clarification on what is planned for this plot as leaving it empty creates a vulnerability to plot 64 (*Officer comment: plot 64 is a maisonette, so plot 63 is the garden space for the upper floor maisonette dwelling*).

## 4.9 Thames Water

#### *Waste Comments*

Thames Water are currently working with the developer of application 211843 to identify and deliver the off-site FOUL WATER infrastructure needs to serve the development. Thames Water have identified that some capacity exists

within the foul water network to serve 100 dwellings but beyond that, upgrades to the waste water network will be required. Works are ongoing to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. "There shall be no occupation beyond the 100th dwelling until confirmation has been provided that either:- 1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan." Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.

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.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer.

There are public sewers crossing or close to the development. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

#### 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 demand 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. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development".

#### 4.10 RBC Ecology Adviser

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 to housing, gardens and public open space.

The previous application (ref: 210018) was refused on the grounds that:

“4. The proposal results in a net loss of biodiversity within the site. 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 Policy EN12 (Biodiversity and the Green Network) of the adopted Reading Borough Local Plan 2019 and paragraph 180 of the National Planning Policy Framework (July 2021).” This current application is for a slightly different scheme to the previous one with fewer houses along the north-east boundary, more in the north west corner (where the SuDS feature) will be reduced in size and some other alterations.

The previous application was accompanied by a Biodiversity Impact Assessment calculation that concluded that without offsite mitigation the development would result in the loss of 4.83 Habitat Units (HabU) [31.88 before development and 27.05 after] and an increase in 2.66 Hedgerow Units (HedU).

As per my memo for that accompanied dated 5 July this was probably an underestimation in terms of the loss of HabUs (the HedU was probably correct). To offset the loss of HabU the applicant proposed to improve the ecological value of part of the remainder of the golf course and or areas of land owned by Reading Borough Council.

The current application has been accompanied by a BIAC that concludes that the proposals will result in a net gain in 4.4 HaBu (36.29 Habu before, 40.69 Habu after) and 4.41 HedU (8.89 HedU before and 13.3 after) without any offsite mitigation. This is very different to the previous application and it seems rather strange that such a conclusion could be reached.

My advice therefore is that the new calculation is almost certainly incorrect for the following reasons:

1) They have chosen to categorise the strips of woodland within and along the boundary of the golf course as “Urban Tree”. This is incorrect. The definition of Urban Tree is given in the Metric 3 user guide. This reads:

*“‘Urban tree’ applies to all trees in urban habitats such as private gardens, private land, institutional land and land used for transport functions, roads, streets, canals, rail, footpaths etc.”*

Clearly the golf course is not currently an Urban habitat. The definition of Urban as per the UK Habitat Classification Habitat Definitions is shown below:

UK HABITAT CLASSIFICATION – HABITAT DEFINITIONS	
<b>u Urban</b>	
<b>Definition</b>	<b>Position in the Classification</b>
Constructed, industrial and other artificial habitats	Primary
<b>Inclusions</b>	Level 2
Constructed, industrial and other artificial habitats in rural areas.	<b>Edition</b>
<b>Exclusions</b>	Basic and Professional
Grasslands, woodlands, heathlands, wetlands, rivers, lakes, sparsely vegetated land in urban areas.	<b>More detailed categories available</b>
	8 subset categories
	<b>Categories at the next level</b>
	u1
	<b>Status</b>

The woodland areas should be classified as woodland or parkland as they were for the previous application.

2) The total area was 11.38 ha in the last application and is shown as 12.98 ha in the current application. The report accompanying the matrix calculation says the total area is approximately 12ha.

These all need to match each other, or any difference clearly explained.

3) The strategic significance for the entire site both pre and post intervention is given as “High strategic significance” i.e. “Within area formally identified in local strategy.”

Although a Green Link crosses the site this certainly does not mean that the entire site is of “High strategic significance” (using this in the metric increases the number of HUs)

4) There are no habitat parcels (other than those given on Figure 21) referred to in the BIAC spreadsheet. The Guidance states that these should be used.

5) They have not provided maps showing habitats (using the UKHab definitions) before and afterwards. They have numerous figures with different habitat types. This makes it very difficult to assess.

Two maps are needed:

- Habitat parcels (each parcel with its own ID), mapped to UK Hab classifications, pre-development
- Habitat parcels (each parcel with its own ID), mapped to UK Hab classifications, post-development

These need to be cross referenced to

- detailed target notes and habitat condition assessment sheets for each habitat parcel (pre-development)
- a description of the assumptions made for each habitat parcel post development

6) It is very unlikely that the proposed new neutral grassland (see 3.1.2 and Figure 4) will reach good condition. It will be subject to dog walking (and associated nutrient enrichment from faeces and urine which will favour coarser grasses), trampling and other recreational pressures.

Furthermore, the grassland appears to overlap the woodland on the plans that have been provided.

### **Summary**

In summary the applicant claims that there will be a net gain for biodiversity (as measured using the DEFRA Metric) of 4.4. Habitat Units but this is almost certainly not the case.

It is significantly different to what was claimed by the applicant for the previous application which showed that there would be a significant net loss on site of +- 5 habitat units.

It seems highly unlikely that the proposals can achieve such a gain on site and it is recommended that the applicant is asked to submit a corrected BIAC that addresses the points above.

It is very likely that offsite habitat enhancement (within the retained golf course as per the previous application) will need to be provided to offset the loss of habitat units on site. As a minimum outline details of these should be provided before the application is determined.

#### 4.11 Third Party Ecological Adviser

Given the above comments from the RBC Ecology Adviser there is a clear and significant difference of professional opinion with the Ecologist who prepared the *Habitat assessment and biodiversity impact assessment calculation* on behalf of the Applicant. As such comments from a further independent Ecologist have been sought in respect of the calculation. These comments are set out below:

*This letter provides an independent commentary on the comments provided by RBC Ecology Consultations (the LPA Ecologist) on 11/2/2022 relating to outline planning application (ref 211843) for Land at Reading Golf Club. Those contributing to this review have had no involvement to date with either the Applicant, the project, the LPA Ecologist or the Applicant's Ecologist. The intention is to provide an unbiased and independent review of the issues, with the intention of reaching a resolution to the ongoing dialogue. These comments relate to a difference of opinion around the use of the Defra Biodiversity Metric to calculate biodiversity units and the resultant biodiversity units as presented. It is important to note that the LPA Ecologist does not raise any objections in relation to the impact on protected or priority species. The nature of the comments made relate solely to the Biodiversity Net Gain calculations and their conclusions.*

*Currently there is a substantial difference of opinion in relation to both the comparison between previous assessments of the site (not for this planning application) and the UK Habitats categories forming the baseline assessment. To summarise, the points of contention covered here are discrepancies/differences of opinion in relation to:*

- 1. assessment of the baseline, including comparison with a previously submitted (and refused) application - 210018;*
- 2. categorisation of the habitats present (urban trees or broadleaved woodland or parkland) within the site;*
- 3. discrepancies in relation to the total area of the site; and*

#### *4. likelihood of success of the proposed habitats to be created.*

*Whilst it is noted that there are concerns around the consideration of the Green Link and the requirement to provide additional mapping, these are not covered. I agreed with the LPA Ecologist that updates to the submitted documentation would be expected on the basis of the current guidelines for clarity and completeness.*

*Whilst noting that the previous proposals (210018) were for a different scheme, the LPA Ecologist concluded that the different conclusions of the two Biodiversity Impact Calculations (BICs) was 'very strange'. We would counter this with the point that it is in actual fact highly unlikely that they would be the same for two reasons:*

- a. the schemes themselves are not the same; and*
- b. the two schemes used different versions of the Defra Metric.*

*Whilst the first point is of course relevant, it is the second that should be given the greatest weight. In addition to the fact that the design of the proposed scheme is not the same, neither are Defra Biodiversity Metric 2.0 and Biodiversity Metric 3.0. In fact, it is for this reason that Defra stated the following upon release of Biodiversity Metric 3.0:*

*'Users of the previous Biodiversity Metric 2.0 should continue to use that metric for the duration of the project it is being used for as they may find that the biodiversity unit values metric 2.0 generates will differ from those generated by Biodiversity Metric 3.0.'*

*In consequence, whilst it is understandable that there is a desire to compare the two applications in terms of their resulting biodiversity units, it should be avoided as no meaningful conclusions can be drawn.*

*There is also an implied statement in the commentary provided by the LPA Ecologist that, because the previous application stated a loss without offsetting, this new application similarly could not deliver net gains. They then go on to state the conclusion that '.. the new calculation is almost certainly incorrect....'. It is considered that these statements are not based on the evidence as presented by the applicant's ecologist (The Ecology Co-op) as the possibility and indeed commitment to net gains are clearly presented. Although, it is also important to note that the Applicant's Ecologist states that as this is an outline application, further iterations of the calculations will be required pending detailed designs.*

*Use of metric-based approaches is, in general, fraught with issues pertaining to manipulation where common sense and ecological expertise are not employed in tandem with the calculator. Fundamentally, achieving Biodiversity Net Gain is far more than just an exercise in 'ecology by numbers'. It is of paramount*

*importance to ensure that delivery of habitats to be enhanced and or created is done so to the highest of standards and is based on sound ecological principles.*

*In this regard, updates to the Biodiversity Metric 2.0 took account of the issues and errors identified and the advice of industry professionals in an effort to make it as transparent, accountable and repeatable as possible whilst reducing the opportunities for misclassification and poor judgement. Nevertheless, the skill required to make the right choices in terms of the habitat types is central to its success. It is this fact that is being challenged here. The LPA Ecologist suggests that the Applicants have mistakenly categorised the baseline units. Upon review of the information provided, alongside available online resources, it is our professional opinion that the Applicant's Ecologist has made appropriate decisions and we concur with the habitat classifications.*

*Whilst there is no perfect solution to categorise scattered trees as part of the Biodiversity Metric 3.0, the Ecology Co-op have in fact identified three types of habitat relating to trees within the proposed development site: urban trees; tree lines; and lowland mixed deciduous woodland. Aside from the parcel of woodland to the north, habitats with trees are present as part of a matrix formed of amenity grassland and immature, scattered trees. We agree with the Ecology Co-op that these cannot be considered as woodland due to the lack of closed canopy, managed amenity grassland ground flora and presence of many trees below 5m. Similarly, the habitat is not parkland as this supports veteran/ancient trees not present in this case. We, therefore, agree with the Ecology Co-op, who have determined that the most suitable habitat category is Urban Trees and it is agreed that consideration of the habitat as woodland would be an inaccurate representation of the current baseline. It is also of note that the urban trees and identified tree lines are not included on the National Forest Inventory (2014) as woodland of any category, although woodland blocks to the north of the proposed development site are.*

*Through the use of the Street Trees Helper Tool as part of the Biodiversity Metric 3.0, both the trees and the amenity grassland are considered as habitat areas. This in theory increases the total area of habitat entered as part of the baseline. However, this potential double-counting is excluded from the overall site area and accounts for differences between the previous application and the current application. Overall, it is our professional opinion that the Applicant's Ecologist has carried out a thorough and appropriate BIC that does represent the baseline biodiversity units of the proposed development site and there is no demonstrable difference in area.*

*Whilst the measures set out in the LEMP provided by the Ecology Co-op are clearly set out and comprehensive, it is our view that the operational phase of the proposed development is more likely to result in 'moderate' rather than 'good' condition habitats. This is in view of the likely usage patterns post completion (i.e. including localised enrichment) even despite regular management and maintenance. We consider that the net gain would, therefore,*

*be reduced to 1.7% at worst. It is therefore considered that the overall gain in biodiversity units would, in reality, fall somewhere between 1.7% and 4.4%*

*This, however, remains in accordance with local planning policy that states that: '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.'*

Further to the above third-party ecology comments the **RBC Ecology Adviser** has confirmed acceptance that there would be a small biodiversity net gain on-site, but that a contribution towards off-site biodiversity enhancements within the local area should be secured to provide for a minimal overall 10% net gain in biodiversity. This would be secured as part of the section 106 agreement

#### 4.12 RBC Environmental Protection

##### Noise impact on development

The environmental statement indicates that the recommended standard for internal noise can be met, if the recommendations from the assessment are incorporated into the design. It may be that a more detailed scheme is also required. It is recommended that a condition be attached to consent to ensure that the glazing (and ventilation) recommendations of the noise assessment (and air quality assessment, where relevant) will be followed, or that alternative but equally or more effective glazing and ventilation will be used.

##### Noise generating development

Applications which include noise generating plant when there are nearby noise sensitive receptors should be accompanied by an acoustic assessment carried out in accordance with BS4142:2014+A1:2019 methodology.

The noise assessment needs to establish the predicted noise rating level taking account of any characteristic factors like tonality or impulsiveness of the noise. The rating level should be compared with the background noise level.

In Reading, planning policy states that the plant specific sound level to be at least -10dB below the measured background level and for the plant noise rating level to not exceed the measured background level. This is to prevent cumulative impact from addition of plant over time which could result in background creeping up to levels which might cause adverse health impact, which is more likely in a densely occupied town such as Reading. Levels of -10dB ensure that the background level is not increased, and nuisance is unlikely.

A suitably worded condition is recommended to secure submission of an appropriate noise assessment prior to installation of any plant.

##### Noise arising from development

Experience shows that noise and vibration from site activity during construction can severely impact on the lives of residents living nearby. Best Practicable Means must be employed to minimise disruption. In addition, we expect the

developer to seek Control of Pollution Act 1974 S61 consent. This helps to show that the impact on both the environment and local community has been properly considered and appropriate mitigation measures put in place to reduce negative impacts. This issue has also been considered in the 'Construction & Demolition Phases' section below.

#### Air Quality

The air quality assessment submitted with the application has been carried out according to best practice guidance.

#### *Operational Phase*

The impact of the development on air quality due to increased road traffic emissions with the proposed development completed was assessed to be 'not significant', with a 'negligible' impact at the receptors used to model the change.

The model used was a conservative worst-case estimate using 2022 emission factors for 2026 traffic flows and verified using 2019 monitoring data.

No locations were found to be in exceedance of air quality objectives for NO<sub>2</sub>, PM<sub>10</sub> or PM<sub>2.5</sub>. With the largest change a 0.2µg/m<sup>3</sup> (1%) increase on NO<sub>2</sub>. When assessed using IAQM Guidance the change is categorised as 'negligible'.

It is important that we try to reduce air pollution as much as possible, as health impacts are now known to occur well below national objective levels. The proposed development will increase vehicle congestion through Caversham and make air quality improvements harder to achieve. As suggested in the assessment, if the development goes ahead, a contribution should be sought to go towards signalling improvements at the Peppard Road/Prospect Street/Henley Road junction.

#### *Construction & Demolition*

The assessment shows that with mitigation the residual impact of dust emissions on existing receptors is 'not significant'. However, this relies on the mitigation of dust emissions being effective.

It is therefore critical if the development goes ahead for a Dust Management Plan to be developed and implemented in line with IAQM guidance, as listed in section 7.7.2 of the air quality assessment.

There concerns about potential noise and vibrations affecting existing receptors near to the site. Best Practicable Means, and appropriate standards such as BS5223+A1:2014 should be followed at all times.

Even so there will be residual effects on residents living nearest the site, it may be appropriate for the developers to monitor noise levels and apply additional mitigation where noise levels are found to be particularly disruptive.

We would expect a COPA S61 application to be submitted detailing all the measures to control noise and vibrations at the site, so that these can be reviewed prior to approval being given.

Dust associated with the construction (and demolition) of the proposed development has been mentioned under the air quality section above. Measures to control this must be developed and implemented in line with IAQM guidance as specified in the air quality assessment.

Therefore, a condition is recommended to secure submission and approval of a construction method statement prior to the commencement of any development on site.

#### 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. A phase 2 site investigation should be carried out informed by the findings of the phase 1 investigation submitted with the application and should be secured by condition together with any necessary remediation works.

4.13 **RBC Leisure:** Seek a contribution of £557, 500 to local leisure facilities.

4.14 **RBC Natural Environment**

The site is subject to Area TPO 4/18 which protects all trees on site. There is an expectation, especially in light of the refusal of 210018 that proposals will have due regard to trees on site, particularly the higher quality trees / groups of trees in terms of avoiding harm through works within their Root Protection Areas (RPAs) and avoiding an unsustainable future relationship between retained trees and new dwellings, e.g. from shading or likely impact on foundations through root activity. In addition, to meet with the aims of our Tree Strategy, which supports Policy EN14, there will be an expectation that tree planting will exceed tree removals to result in a net gain on site, within the RBC boundary.

With reference to proposed Site Layout Rev L, I have the following comments with reference to specific documents, as detailed. Where comments need to be specifically noted for action (either by you or the arb consultant or landscape designer), these are in bold for ease (excluding subheadings):

#### Landscaping

##### DESIGN AND ACCESS STATEMENT - LANDSCAPE CHAPTER NOVEMBER 2021

This states that *there are 320 trees or groups of trees on or near the Site. Of these, 11 are high quality (category A) and comprise English oak and Scots pine; 119 are moderate quality (category B); 174 are low quality (category C) and 16 are unsuitable for retention quality (category U).*

It advises that *the outline proposals require the removal of 112 no. of trees to allow the construction of dwellings, parking spaces and associated*

*infrastructure. Of these, 15 trees are 'B' (moderate quality) category, 73 are 'C' (low quality) category, and 9 are 'U' (unsuitable for retention quality) category*

*It further advises that: There are 320 trees or tree groups already exist on Site, and effectively 223 of them are proposed to be retained (112 no. of trees are proposed to be removed). The masterplan layout has been influenced by the tree retention, the zone of influence of the future anticipated rooting zone associated with that particular tree species and their shading, therefore, the density of the trees (consider both the retained and the proposed) are relatively high in comparison to the surrounding areas, and has utilised the full spatial potential within the public realm areas.*

The Landscape Masterplan intent includes: *The retention of the significant trees across the Site; There are 320 trees or groups of trees on or near the Site. 112 no. of them are proposed to be removed, which primarily comprise low quality trees and taken into account of the comments from the Tree Officer in relation to shading and the Zone of Influence (Zoi) from the previous planning submission;*

In relation to planting, the document advises that *196 no. of native tree species are proposed across the Site (planted at a mix of 5m and 3m in height at day one) to provide a direct replacement for those lost (the majority of which are category C grade). Section 3.3. lists the species and Tree Planting Plan D2743 P03 has been provided. This plan breaks down the proposed planting into the percentage of each species all of which, except perhaps Hazel, are an acceptable percentage. Detailed landscaping will require a table to breakdown ratio to demonstrate a 30:20:10 ratio in relation to Family:genus:species - it will be required for the detailed landscaping hence the principle of achieving this should be accepted now at least. I note the species includes Lime (Tilia cordata) which is not ideal as our Tree Strategy highlights Limes as an over-represented genus, however they do tie in with those on the Kidmore End Road frontage so some will be acceptable (dependent on number). The species list includes two evergreens (Pine and Cedar) so will provide some all-year round greenery.*

I note the hedge species proposed (5 different species) are all native.

I note 5.2 Hard landscape types - this will have to be considered in greater detail at a later stage and it should be ensured that new surfacing where within RPAs is appropriate in terms of permeability and flexibility.

Landscape Management & Maintenance is given in principle and, as indicated, details would be secured at a later date. This will have to include details of who will be responsible for what landscaping/areas, e.g. private residents, management company or RBC - an accompanying plan will be required for this. The management plan should cover long-terms aims and maintenance. I note that 6.5 Existing Trees states: *'Remove dead, diseased, decaying and damaged*

wood' - this will not always be appropriate, e.g. for the veteran Oak for which the retention of this type of wood is important for the habitat such trees provide - this will need to be acknowledged. The land under the canopy will have to be managed to discourage access to allow the safe retention of such wood, but this can be done in an visually unobtrusive way, e.g. attractive fencing, placing of felled trees (large logs) under the canopy and allowing the grass to grow long. The applicant could consider an interpretation board providing info about veteran trees and their features (such as dead wood) to explain the importance of being able to keep these, hence lack of access.

Tree pits specifications are not dealt with in depth (some info is included on the Tree Planting Plan) but can be secured via condition. These will vary and each will need to be specific to the type of ground and surroundings a tree is planted in - an appropriate soil volume will have to be demonstrated for those within or adjacent to hard surfacing.

Reference is made (as it was in the previous application) to: *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.* Comment on this is given below.

FIGURE 3.6 - OPEN SPACE PROVISION PLAN indicates that, as previously, the OS provision has counted some small spaces and thin strips of land, the 'usability' of which is questionable and are unlikely to be utilised by all the residents due to size, access and location which makes some appear private, e.g. adjacent to Plots 62 & 64, between Plots 184 & 185 & adjacent to Plot 76. In relation to the strip of open space shown along the southern boundary (running from Plot 8 to 46), I would suggest that this would have to include features to create a 'usable' space e.g. a woodland path or trim trial.

I note that 4.2 Play includes Tree swings and play - if these swings are envisaged on existing, retained trees, I would have concerns and these should be avoided due to potential harm to trees.

5.1 states: *The proposed tree locations have been co-ordinated with the proposed underground utilities to ensure the integrity and principle of the tree strategy can be realised. Wherever needed, underground utility apparatus will be routed outside the tree / hedge Root Protection Areas (RPAs) in 'service corridors' throughout the Site, using ducts and shared trenches to facilitate this as a co-ordinated approach. The lighting, ground conditions and building foundation design are unknown at this stage. Planting may also be subject to changes in order to address any further engineer's advice on vehicle tracking and sight lines.* At the detailed stage we will expect there to be no conflicts between services and either retained or proposed trees.

Fairfax (Reading) Ltd & Reading Golf Club Ltd, Reading Golf Club, Emmer Green, Environmental Statement Volume 1, Non-Technical Summary, Version 2.0 dated 05/11/2021 advises that landscaping is dealt with in Volume 3, the LVIA.

LANDSCAPE VISUAL IMPACT ASSESSMENT APPENDIX A November 2021:

I will leave other officers to comment on the LVIA but have looked through this document. I note this refers to the 2010 Tree Strategy, rather than the latest Strategy (adopted March 2021).

2.4.62 states: *To facilitate the above, the following opportunities most relevant to the study area and the future development of the Site have been identified as:*

- *“Consider ecological designations for parklands, orchards and hedgerows in particular. Consider Tree Preservation Orders in relation to ‘landmark’ and veteran trees;*
- *Maintaining woodland on ancient woodland sites and conserving ancient hedgerow boundaries. Conserve ancient trees and veteran trees, planting or identifying nearby successors in order to secure the deadwood resource and associated biodiversity in the long term. Continue restoration of Plantations on Ancient Woodland Sites;*
- *Conserving the diverse arrangements and particular species compositions of wooded features in designed landscapes, incorporating native and exotic species in avenues, groves, belts, shrubberies and so on. Carry out historic landscape character assessments and devise management plans to inform conservation efforts. Ensure that succession planting respects the original planting and seeks to maintain the historical continuity and sense of place. Target Registered Parks and Gardens, particularly those ‘at risk’, but also consider parklands of local importance and ‘landmark trees’.”*

2.4.95 states that: *In total there are 320 surveyed trees or groups of trees on or by the perimeters of the Site. Of these 11 are category ‘A’ (high quality), which are predominantly native oak species and scots pine; 119 trees or groups are classified as ‘B’ (moderate quality); 174 trees or groups of trees are ‘C’ (low quality) and 16 are ‘U’ (unsuitable for retention quality). Tree removals are required, as detailed elsewhere, with 2.6.29 confirming the removal to equate to 35% of the total tree stock.*

As confirmed in 2.4.97 & 2.4.104, the landscape value of receptors ‘trees & vegetation pattern’ and ‘Landscape’ is judged to be high.

2.4.108 Key characteristics include *‘Mature trees set out in both linear arrangements and groups define the greens and are scattered through the Golf Course and on the Site boundaries, characteristic of golf courses’*

2.5.2 highlights the key features to be retained and protected.

2.6 describes the likely impact from the construction phase but does not appear (ref 2.6.5) to include tree removals as part of this phase which it would be as this would be done prior to commencement. Perhaps this is what is being referred to in 2.6.4 and in any case 2.6.6 goes on to confirm a magnitude of change of 'minor- moderate' to the woodland and vegetation pattern receptor.

2.6.17 refers to the long-term benefit to the landscape from the proposed new woodland; that being the 1000 whips to be planted off-site in the SODC area. Whilst a new area of woodland is positive, albeit it won't ultimately be anything like 1000 trees due to a % failure rate and thinning over time, from our site visit, this area is in a valley surrounded by existing trees so the confirmation that this will only provide 'minor beneficial significance' seems correct.

2.6.1 states: *The Site will be constructed in one phase, broadly from the east to the north-west direction following the proposed main access road. The contractors' compound is expected to be located in the centre of the Site temporary, then relocate to the northern tip as construction progresses.* However, the relocation of the contractor's compound suggests that a phased approach will be required - this will certainly be expected in the Arb Method Statement to account for such changes. 2.6.20 seems to confirm that there will be phases and states: *'Some dwellings might be occupied during the construction of the remaining part of the Site'*. Clarification should be sought in order that conditions can be appropriately worded.

2.6.29 provides the number of existing trees and those to be removed and states: *However, the Indicative Site Layout provides the opportunity to sequentially plant approximately 112 trees within the Site, wholly within the public realm areas (at the latter stages of the construction phase) in addition to the planting of at least 1000 trees as a new compensatory woodland block (refer to Figure 19) to the west of Cucumber Wood in the wider Golf Course area to the north.* The number of proposed trees is not consistent with the DAS (and in 2.6.73) therefore I don't know if the conclusion to the impact of Tree and Vegetation Pattern and Site Landscape Features in 2.6.30 is correct. In addition, as stated for the refused application, 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. The previous application made it important to consider whether these trees should be taken into account in order to provide a suitable net gain (the net gain within the site being only 6 trees). However, the current proposal provides a much greater net gain within the site, which is acceptable in itself; the woodland area then being in addition to this.

### Existing Trees

Arboricultural & Planning Integration Report from Arbortrack Systems Ltd, ref jwmb/rpt8/rgc/PI, dated November 2021:

The summary confirms:

*There are 319 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 (Pinus sylvestris), i.e. 262 & 265. 118 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 97 trees or groups of trees (112 trees in total) to allow the construction of dwellings, parking spaces and associated infrastructure. Of these, 15 trees are 'B' (moderate quality) category, i.e. 9, 21, 37, 38, 95, 96, 99, 100, G138 (8 in group), G165 (3 in group), 181, 190, 194, 201 & 253. 73 are 'C' (low quality) category and 9 are 'U' (unsuitable for retention quality) category, i.e. trees 22, 46, 68, 115, 135, 197, 275, 276 & 305. (as per the Landscape information, removals equate to 35% of the tree stock). I recognise that the removal of 'mature' trees will raise concern. Of these 'mature' trees to be removed, it should be noted that 'mature' is taken (by the arb consultant) to be anything 50+ years old which is somewhat arbitrary as for some species, such as Oak, 50 years will be young whilst for other species such as Birch, Willow & Poplar, it will be old. The survey categories the age classes of trees into various categories, 4 of which contain the word 'mature'. Of 112 the trees to be removed, the split in age group is 2 young, 23 semi-mature, 38 early mature, 7 post mature & 27 mature trees = 97 trees/groups (no mature trees are in the 3 groups to be removed). Hence in terms of 'mature' or 'post-mature', which may be of most interest, there are 34. To aid consideration of these 34 trees, Arbortrack Services have provided the following details:*

*'The 7 post mature trees (3 wild cherry & 4 hawthorn i.e. 47, 135, 197, 206, 252, 296 & 305) are arguably coming to the end of their useful lives. 4 are 'C' low quality by my estimation i.e. 47, 206, 252 & 296 and 3 'U' unsuitable for retention by my estimation i.e. 135, 197 & 305. These species are very well represented in the local area and are common natives. I assume that they (like the great majority of the trees on the golf course) were planted as landscape trees (and to define fairways etc) in the last x years. As such they contribute to amenity to an extent & are valuable for wildlife, of course, but I also feel that their relatively short useful life expectancies dictate that they cannot reasonably be considered to be constraints to development now and that the replacement planting offered will more than compensate for their loss in the relatively short term.*

I agree with this conclusion.

*The 26 mature trees earmarked for removal are lime (2), ash (2), downy birch (1), silver birch (2), flowering cherry (1) wild cherry (1), horse chestnut (1), Leyland cypress (2), hawthorn (3), cherry laurel (1), lilac (1), Myrobalan plum (2), poplar (2), rowan (1), Norway spruce (1) and whitebeam (3). Of these 15 species six i.e. ash, downy & silver birch, wild cherry, hawthorn and rowan are natives.*

*Of these 26 mature trees a flowering cherry (22), a silver birch (115) & a horse chestnut (276) are 'U' unsuitable for retention category-3 trees in total. We agree that these are likely to have useful life expectancies of less than 10 years'.*

In relation to the 'B' category 'mature' trees, which ideally would be retained, the following comment has been provided:

*'7 moderate quality ('B' category) mature trees will be removed. These are: two limes (9 & 21), an ash (181), a silver birch (194) & three (Swedish) whitebeam (95, 99, 100). The loss of moderate quality trees is regrettable. I would point out however that the loss of two non-native limes from the row beside Kidmore End Road (9 & 21) is extremely unlikely to detract from the amenity contribution made by that row. In relation to the ash (181) whilst noted as a 'B' category moderate quality tree, it should be noted that ash dieback disease is ubiquitous throughout the site and is likely to kill at least 90% of all ash trees present. The three moderate quality (Swedish) whitebeam (95, 99 & 100) are small to medium sized non-native ornamentals and I could very easily justify a 'C' low quality categorisation for these - I chose not to do so. I do believe that the provision of 196 replacement trees for 112 tree removals is necessary & proportionate'.*

With reference to these mature 'B' category trees, I agree that the landscape value of the Whitebeam can be replaced through replacement planting due to their size; the Birch will be in the latter stages of it's lifespan and that there is a high probability that the Ash will decline in due course. As such, I agree that none of these should represent a constraint to development. In relation to the two Lime, these are at either end of the line of Limes on the frontage, hence their removal is not so significant from an amenity point of view - whilst their removal is not ideal, it is required to allow for the accesses shown, so retention would require a complete redesign.

The summary confirms the intended 196 trees (within the site) which is a 1:1.75 replacement ratio and provides a net gain (of 84 trees), as required, notably greater than the previous application and of an acceptable level. Whilst tree loss is unfortunate, redevelopment on the scale of that proposed would not be possible whilst retaining all trees - some of which are likely to have been felled anyway on arboricultural grounds.

6.2 confirms that new hard standing will be required within the root protection area (RPA) of trees 2-5 (Limes), 147, 148, 149 (Oaks), 150 (willow), 162 (Scots pine), 198 & 258 (Norway maples) and will be constructed to a 'No Dig' specification. Details will need to be included in an Arb Method Statement (note comment on type of hard surfacing above).

6.4 includes the comment that *suggested housing density associated with the accepted policy of Ca1b allocation agreed at the eastern end of the site suggests that the layout as shown is ultimately likely to be acceptable*. I don't know how the density within Ca1b was determined but if this did not consider the full constraints, e.g. from trees, then it cannot be taken as an absolute requirement. This application will have to consider all factors in determining the acceptability of the density proposed.

6.5 advises that *the new layout retains or improves upon the relationship between retained trees & built form, specifically with regard to plot 98 (tree 211), trees to the side of plots 118 & 119 (trees 278 & 279) & plots 80, 82, 85 & 86 (trees 142, 143 & 182-184)* - comment on layout concerns are given below. It also confirms that *Zones of Influence (ZOIs) have been added to the existing tree stock as well as to proposed planting and are illustrated in Appendix F. By our initial estimate, 11 plots will require engineer designed foundations, i.e. 215-223, 96 & 97, and 91 plots will require deeper foundations - as per NHBC 4.2 guidance*. This indicates the constraints posed by trees long term which the applicant must accept, i.e. there is likely a cost implication to address this. As indicated, full details can, and must, be provided at the full application stage or via the discharge of an appropriate condition.

7.1 considers that the development will not lead to undue post-development pressure for tree work. However, I have some concerns on this matter relating to Plots 5, 46, 53, 62, 161, 223 and 99 & 105 in relation to trees and their shade bearing overbearing. In relation to the latter two plots, when development proposals were first submitted, I expressed concern over having plots close to this tree screen; plans were revised and the refused application did not include plots here. In addition, Rev N (submitted pre-submission for informal comment) was acceptable in this respect with limited plots here and at a greater distance from the tree screen. The current proposals bring the two plots in close proximity to the tree line. Some further consideration is required.

8.5 Areas within RPAs potentially requiring ground protection, i.e. for trees 36 (Oak), 61 (Oak), 64 (Cherry) & 188 (Oak) - another matter to be dealt with in an Arb Method Statement.

I note that there is no comment on the impact of construction of the SUDs on retained trees as expected given the ground level changes required and proximity to retained trees. This is required prior to a decision.

As above, any phasing needs to be considered and if applicable, the AIA should cover this prior to a decision (and subsequently be included in an AMS).

Other matters:

Archaeology - if a scheme or archaeological works are recommended. It must be ensured that this takes RPAs of retained trees into account to avoid trenches in these zones. Similarly, the results of the survey need to be fed back to the landscape architects to ensure tree planting is not proposed in sensitive areas.

In conclusion, there are matters that need to be addressed which I consider need to be resolved but that they can be appropriately addressed through conditions, if approved. The following conditions are those which would need to be considered:

- Full hard and soft landscaping details (L2)
- Details of boundary treatments (L3)
- Landscape Management and Maintenance Details (L4)
- Arboricultural Method Statement (L7)
- Removal of domestic PD rights
- External Lighting Scheme (N19)
- Construction Method Statement (C2)

#### 4.15 RBC Transport

*Site Accessibility*

Kidmore End Road is a single carriageway local distributor road operating a speed limit of 30mph. No parking restrictions apply along Kidmore End Road in the vicinity of the site with on-street parking on the eastern side of the carriageway between the junctions of St Benet's Way and Grove Road, creating a narrowing of the road.

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.

A footway is provided on the western side of Kilmore End Road, which is approximately 1.5m wide and is segregated from the main carriageway by means of a 2.5m-wide grass verge. However, the width of the footpath 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.

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.

### *Means of Access*

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 45675/5511/001** (Image below). The existing northbound bus stop located on Kidmore End Road will be relocated north to accommodate the proposed site access.

READING GOLF CLUB SITE ACCESS LAYOUT - Drawing 45675/5511/001



The vehicle tracking provided within the Transport Assessment (TA) indicates that the access can accommodate both a refuse vehicle and rigid truck 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.

Visibility splays have been demonstrated on **Drawing 45675/5511/001**. 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 4.2.12-14) that Reading Buses are supportive of the principle of the development as it offers to increase local bus Patronage as the current bus stops could serve the residential development 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. However, the internal road has been designed at 5.5m, in line with RBC design guidance, but includes a 1m verge that could be used to widen in future to enable a bus route to connect into the possible North Reading Orbital Route as set out in the Reading Transport Strategy 2036.

It is identified that the existing northbound bus stop will need to be modified. A concept layout of the modified bus stop can be seen in **Drawing 45675/5511/001**. The detail design of the bus stop is proposed to be secured by condition prior to commencement and the provision of steps and a ramp will be investigated.

The existing **secondary access** has been maintained, however it has been slightly relocated and improved to include a footway and informal crossing with tactile paving. This will provide general vehicle access to the crescent apartments only. 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.

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.

A Walking and Cycling Links Plan is included in Appendix K, illustrating potential locations for walking and cycling lanes but which do not form part of the current planning application. The land directly adjacent to the application site is illustrated as existing grassland. Other 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'. Upgrades to this facility are subject to planning application SODC currently under consideration (ref P21/S2089/FUL). Land to the north of the development site within South Oxfordshire administrative area will be accessed via Tanners Lane and all the traffic associated with the reduced leisure offering will be directed to the road network in South Oxfordshire.

### *Pedestrian & Cycling Access*

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

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. Footways and cycle routes are proposed within the development for greater permeability within the site through landscaped areas between properties. All streets within the

development, other than the main street, will be designed as quiet roads suitable for walking and cycling.

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 has been explored previously without success of securing a pedestrian link. 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, into land owned by the Golf Club that can be used for leisure purposes, Appendix K. These do not form part of this application (redline area) but would provide enhanced accessibility to/from the site for pedestrians and cyclists.

### *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*

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.

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;

Table 4.4: Vehicle Parking Standards (Zone 3)

Land Use	Unit Type	RBC Parking Zone 3
C3 Residential	1-bed apartment	1.5 per unit
	2-bed apartment	1.5 per unit
	3+ bed apartment	2 per unit
	1-bed house	1 per unit
	2-bed house	1.5 per unit
	3+-bed house	2 per unit
	Visitor Parking	1 space per 4 dwellings (apartments only)

The development comprises predominantly two, three- and four-bedroom houses with garage and/or driveway parking. The car parking provision proposed for the site is shown in **Table 4.5**.

Table 4.5: Car Parking Provision

Unit Type	Number of Units	Number of Spaces
1-bed Apartment	6	9
2-bed Apartment	6	9
1 Bedroom Maisonette	4	6
2 Bedroom Bungalow	3	6
2-bed House	64	128
3+-bed House	140	280
Visitor Parking		4
<b>Total Residential</b>	<b>223</b>	<b>442</b>

A total of 442 parking spaces are provided for residential properties which complies with the Council's parking standards. 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 (flats only).

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.

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 proposed number of fully wheelchair accessible units. Accessible parking has also been provided above 5% in communal parking areas.

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. Active charging points will be located within communal

parking areas for the apartments and homes at a percentage greater than 10%. This would be secured through condition.

The Transport Assessment (para 4.4.10) 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.

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. Full 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, a comparison has been made between the TRICS vehicle trip data and the applicant's assessment. The TRICS vehicle trip data represents a similar outcome than that presented in the TA. 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, Traffic count survey data has been collated by means of Manual Classified Turning Counts (MCTCs) carried out on Tuesday 25th June 2019 (prior to any road works in the area) and Automatic Traffic Counts (ATCs) between 22nd and 28th June 2019. The traffic surveys can be seen in Appendix C of the TA. This identifies that the survey data throughout the week is relatively consistent and does not substantially differ from day to day.

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.

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.

The capacity assessment demonstrates that the proposed site access junction, and the Grove Road / Kidmore End Road operates efficiently and causes minimal delay to traffic on Kidmore End 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.

#### *Peppard Road / Kiln Road / Caversham Park Road*

The capacity assessment at the junction of Peppard Road / Kiln Road / Caversham Park Road show that the Caversham Park Road approach is predicted to operate with relatively high queues and delays in 2026 in the AM peak hour.

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.

The results of these assessments are summarised in Table 7.6 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	0.47	0.0	0.10
Kiln Road	2.5	26.39	1.7	17.25
Peppard Road (S)	0.8	5.18	0.4	2.59
Kiln Road (N)	0.3	8.98	0.0	1.08
Caversham Park Road	18.2	206.45	1.4	17.48
Kiln Road (S)	1.0	7.29	0.6	7.00
2026 Future Year				
Peppard Road (N)	0.2	0.74	0.0	0.08
Kiln Road	2.6	28.44	1.7	18.20
Peppard Road (S)	1.4	6.45	0.5	2.54
Kiln Road (N)	0.3	9.87	0.1	1.40
Caversham Park Road	30.0	323.61	1.8	20.20
Kiln Road (S)	1.0	7.58	0.8	7.01
2026 Future Year + Development				
Peppard Road (N)	0.2	0.86	0.0	0.18
Kiln Road	2.6	28.87	1.9	18.32
Peppard Road (S)	1.7	8.92	0.5	2.97
Kiln Road (N)	0.4	12.07	0.1	1.65
Caversham Park Road	35.0	380.64	2.2	25.28
Kiln Road (S)	1.1	7.69	0.7	7.27

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 2026 future year with development.

A junction improvement scheme is proposed to mitigate the predicted increases by widening the junction entries. The proposal can be seen in Drawing 45675/5511/005 and Figure 7.1 of the TA below.

Figure 7.1: Proposed Mitigation Scheme



The proposed junction improvement scheme predicts that the junction will have 15 less vehicles queuing and approximately 160 seconds less delay when compared to the 2026 baseline as illustrated in Table 7.7

Table 7.7: Peppard Road / Kiln Road / Caversham Park Road Junction Mitigation Scheme Assessment Results

	AM Peak Hour 0800 - 0900		PM Peak Hour 1700 - 1800	
	Queue (Veh)	Delay (s)	Queue (Veh)	Delay (s)
2026 Future Year + Development				
Peppard Road (N)	0.1	0.90	0.1	0.09
Kiln Road	3.0	27.47	1.6	15.33
Peppard Road (S)	1.6	8.70	0.6	2.89
Kiln Road (N)	0.4	9.47	0.1	0.80
Caversham Park Road	14.8	159.03	1.0	11.70
Kiln Road (S)	1.0	7.64	0.7	7.21

The scheme mitigates the increase in traffic volumes generated by the development and reduces the queues lengths and delay below the 2019 base line event. This is therefore acceptable. The junction improvement 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.

*Peppard Road / Prospect Street / Henley Road / Westfield Road signalised control junction*

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.

*Off-Site Highway Works*

Informal imprint crossings, either at carriageway level with dropped kerbs, or raised comprising a flat-top speed hump with a Duratherm herringbone imprint, are proposed on both site access junctions, 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 can improve traffic safety at the junction by slowing vehicles down when entering and exiting the junction or if not raised they also increase visibility of pedestrians to other road users. These informal crossings will be provided with tactile paving to facilitate the crossing of visually impaired pedestrians. An imprint crossing is also proposed at the Kidmore End Road / Peppard Road junction. 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).

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.

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.

A concept drawing of the proposed pedestrian improvements are shown on Drawing 45675/5511/004 and a Stage 1 Road Safety Audit has been undertaken.

As noted above, it is proposed to widen the junction entries on both Caversham Park Road and Kiln Road to allow left and right turning traffic at the give way line simultaneously. This enhancement to the junction should allow vehicles currently caught behind cars in a single line to arrive at the give way line more quickly than they are currently able to, reducing queuing and delay at this junction.

In principle, the proposed pedestrian priority measures are acceptable. 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.

#### **4.16 Berkshire Fire and Rescue**

At this stage there is no duty placed upon the Fire Authority under the aforementioned legislation to make any comment relative to your application.

Your proposals have, however, been cursorily examined and inasmuch as would affect the planning application and the following items, in general, will need to be incorporated in order to meet the basic principles of means of escape in case of fire.

Fire service access should comply with B5 of ADB Volume 1 2019 with additional local requirements below under the Berkshire Act 1986:

Fire service vehicles currently operated by Royal Berkshire Fire & Rescue Service exceed the requirements stated in the current edition of Approved Document B.

The applicant should be made aware of the following amendments:-

The minimum carrying capacity for a pumping appliance is 16 tonnes.

The minimum carrying capacity for a high reach appliance is 26 tonnes.  
Structures such as bridges should have the full vehicle carrying capacity.

Diagram 49 (hydraulic platform dimensions) to be adopted for all fire service vehicles not just high reach appliances

Any structural fire precautions and all means of escape provision will have to satisfy Building Regulation requirement.

#### **4.17 Berkshire Buckingham Oxfordshire Wildlife Trust (BBOWT)**

BBOWT would like to express our objection to the proposed development due to the scale of development proposed and the implications that it would have on biodiversity, as set out below.

We are aware that part of the site is allocated within the Reading Local Plan<sup>1</sup> under Policy 8.3; Caversham and Emmer Green Site-Specific Policies. The CA1b

allocation covers 3.75 hectares in the south-east of the golf course which is significantly less than the 12.15 ha site being proposed. The proposal would therefore result in a significantly increased loss of biodiversity and a reduction in habitat connectivity compared to the allocated site.

Policy CA1b asks for the provision of; “a green link across the site from Kidmore End Road to the remainder of the golf course, rich in plant species and habitat opportunities.” This also links to Policy EN12; Biodiversity and the Green Network that states; “The identified Green Network... shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network.”

The Local Plan Proposals Map2 shows the requirements for a green link running east-west through the allocated site and also running north-south through the wider application site.

The proposed development has been designed to include a ‘green link’ running through it. However, the proposed land use within the link is heavily focused on delivering the drainage strategy (through SUDs features, such as attenuation basins) and amenity uses (including footpaths and a play area) which are in contrast to the policy requirements for green links rich in plant species and habitat opportunities.

Water levels that fluctuate quickly, poor water quality, the need for maintenance, and disturbance by people and their pets are all factors that can reduce plant diversity and reduce the suitability of habitats for a range of flora and fauna.

The Green Space Provision on site (drawing D2743\_102) shows that of the total 7.8 ha of green space provided, only 1.39 ha would be natural or semi-natural habitats and the majority of this is retained habitat that would be fragmented around the site boundaries and does not form part of the green link.

The majority of the green link comprises; SUDs; amenity greenspace; park and garden (including formal and informal play); and equipped play. None of these land-uses are focussed on enhancing biodiversity and all will create conflicts to achieving the best outcomes for nature.

In addition, the former management of the site as a golf course would have involved the regular application of fertilisers to the grasslands which will have accumulated in the soils. The establishment of the proposed species-rich and wetland grassland is going to be very difficult to achieve as the plants present in the species mix require low fertility soils where they will not be out competed by faster growing grass species.

The LEMP3 recommends the use of a suitable seed mixture for chalk soils whereas the Soil Survey Report4 indicates that the soils on site are acidic.

Therefore, it is unlikely that a species-rich grassland would be created as calcicoles would not establish on the site.

The green link becomes very narrow in the southern east-west section where it is tightly enclosed by roads. We feel the ability to create an area rich in plant species and habitat opportunities would be very limited and the effectiveness of the link would be minimal.

The green link would be severed to the south by the built development and therefore the requirement for a north-south green link would not be fulfilled.

Overall, the green link does not meet the requirements of Policies CA1b or EN12 due to the conflicts with other land uses, the potential for habitats of value to fail to establish and the poor connectivity to the south and east. We feel that to be able to achieve the objectives of both policies, there needs to be a focus on creating habitats where the primary aim is enhancing biodiversity and where those habitats can be managed accordingly free from significant disturbance.

This does not appear to be achievable within the constraints of the site and the level of development proposed and therefore we object to the proposal.

**4.18 No responses have been received from the following:**

Emergency Planning; Licensing; Waste Services; Clinical Commissioning Group (CCG); Southern Gas Networks; SSE; Historic England, the Forestry Commission, South Oxfordshire District Council.

**4.19 Member of Parliament for Reading East - Matt Rodda**

I am concerned about the effect the plans would have on the local environment in Emmer Green. A major new housing estate would generate a huge amount of extra car traffic - up to an extra 442 cars - on our already heavily congested and polluted local roads. Air quality in Caversham is poor.

Our community in Caversham and Emmer Green is already under pressure, with a growing population and pressure on public services. Many schools are over-subscribed and police numbers have also fallen. A large additional development is likely to increase this pressure.

I am also concerned about the impact on the wider environment as the UK tries to tackle the growing threat from climate change. The potential extra traffic and carbon dioxide emissions and the removal of over 100 mature trees is significantly at odds with the Council's Climate Emergency statement.

In addition, the application also seems to conflict with a number of Reading Borough Council planning policies in particular Reading's Local Plan and Reading's Open Spaces Strategy.

## Other

4.20 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 creation of a website, freephone information line and project email address. An invitation to a virtual public exhibition was sent to circa 2, 050 residents and exhibitions were held on Monday 18<sup>th</sup> October 2021 and Monday 1<sup>st</sup> November 2021.

### 4.21 Public Notification

Site notices were erected at 5 locations surrounding the site on 30<sup>th</sup> November 2021. Adjoining occupiers were formally consulted by letter - this consultation period ceased on 11<sup>th</sup> January 2022.

The Council has received approximately 4, 900 responses. The very significant majority of which are objections.

It should be noted 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.

4.22 A summary of the comments received is set out in Appendix 1.

### 4.23 Group Responses

### 4.24 CAVERSHAM AND DISTRICT RESIDENTS ASSOCIATION (CADRA) - OBJECTION

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

#### *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 and in SODC 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.
- Constrained roads in Caversham do not lend themselves to the mitigation measures proposed

#### *Air Quality*

- Air quality is already poor in Caversham, additional traffic will only worsen this

#### *Layout and Open Space*

- Layout is dominated by the road network,  $\frac{3}{4}$  of residents will not be able to access the main open space without crossing this which is unsafe and the play area is not served well in terms of surveillance.

#### *Landscape*

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

#### *Biodiversity and Climate Change*

- Significant loss of biodiversity from removal of 112 protected trees; replacement planting falls short of policy requirements.
- Loss of biodiversity, habitats and increase in CO2 levels
- No assurance of delivery of proposed trees outside of the Borough.
- Application fails to provide a green link through the site

#### *Housing*

- No provision for self or custom build.

#### *Cross Boundary Issues*

- Previous proposals for facilities to be provided on SODC land appear to have been removed.

### **4.25 CAVERSHAM GLOBE - OBJECTION**

The following is a summary of Caversham GLOBE's comments and there is further detail in appendices and the full objection can be viewed on the RBC website.

- Building on a greenfield site when brownfield land is available
- Golf course provides visual amenity for the area
- Object to the felling of 112 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 - 223 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
- Object to road widening at Kiln Road/Caversham Park Road and impact on existing street trees some of which were planted by Caversham GLOBE.

#### **4.26 EMMER GREEN RESIDENTS' ASSOCIATION (EGRA) - 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
- Traffic concerns are the main reason for all objections received
- The submitted assessments do not reflect the situation on the ground
- A single road incident in Caversham already brings the whole area to gridlock.
- Inadequate bus services to serve the development

##### *Impact on Local Infrastructure*

- Insufficient doctor and school capacity; unclear how successful the proposed new medical centre would be.
- Detrimental impact on roads and congestion during construction and operation.
- Kidmore End Road is too narrow and can only support one-way traffic because of on-street parking
- Without a third bridge congestion in central Caversham will significantly worsen
- Air quality in Caversham already exceeds permitted levels and will worsen
- Grove Road has narrow footpaths used by school children - extra traffic will be dangerous
- Water infrastructure would need to be increased - Thames Water is not satisfied
- Construction noise and dust impacts on Emmer Green Primary School and local residents generally
- Loss of recreational facilities and open space, wildlife, flora and fauna
- This level of housing north of the river is not envisaged in the Local Plan
- The Local Plan has already accounted for all the required housing in Reading for the next fifteen years
- Infrastructure promises for the previous development at Bugs Bottom never materialised and same will happen with this development

### *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
- 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. Contrary to RBC's declared Climate Emergency aspirations
- The proximity of development to existing TPO trees will lead to overshadowing and potential requests to remove branches or the entire tree.
- Pollution impact at both construction and operational phases of the development.
- It is difficult to see that the proposed residual benefits outweigh the adverse effects listed in terms of landscape impacts of the development. Do not agree with the conclusions of the Environmental Statement.
- Light Pollution and impact on wildlife

### *Local Plan*

- The proposals result in loss of open space contrary to Policies EN7 and EN8
- The proposals are contrary to Policies CC2, CC7, H3 and H5.
- The proposals do not comply with the site allocation Policy CA1B as do not avoid impacts on protected trees, fails to provide green link, do not allow golf activities to continue or access to, do not mitigate the impact on road network, archaeology or water infrastructure requirements
- The proposals would not be built to BREEAM Excellent Standards as required by Policy CC2
- The proposals do not adhere to the Strategy for development in Caversham and Emmer Green set out in the Local Plan in terms of infrastructure and protection of the landscape
- Insufficient transport, education and healthcare infrastructure
- No provision for self-build homes
- Insufficient sustainability information provided.

### *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.

#### 4.27 KEEP EMMER GREEN (KEG) - OBJECTION

The following is a summary of KEG's comments and there is further detail in appendices and the full objection can be viewed on the RBC website.

- Strength of opposition to this and previous applications makes it clear the local community does not want this development

##### *Local Plan*

- The proposals conflict with Local Plan and allocation Policy CA1b - Larger site and more houses which is not justified.
- Will lead to further development on SODC land
- 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.
- RGC's decision to leave the site does not mean default position is to use the site for housing
- The application is accompanied by various unrealistic impact assessments
- The proposals do not take into account potential development at Caversham Park and in SODC
- Impact on local community would be far greater than the benefit to a few at RGC
- Insufficient public consultation by Applicant
- Construction impacts combined with ongoing Covid situation is unacceptable
- Brownfield site for development is a better alternative and should be a priority as per Government guidance.

##### *Non-compliance with Policies*

**CA1b** - Allowed for 90 to 130 homes over 3.75ha, subject to protecting the remainder of the site. The proposed 223 homes across the entire 12ha of RBC land are completely out of scale.

**CC1** - The application does not provide sustainable development.

**CC8** - Over 50 neighbouring properties will suffer harm to outlook.

**CC9** - Provision/funding of infrastructure improvements (transport, open space, education, health) are not demonstrated to be sufficient.

**TR3** - Adverse impact on traffic congestion in Emmer Green/Caversham and threat to safety of cyclists and pedestrians in the immediate vicinity.

**EN8** - Loss of open space.

**EN12** - Biodiversity has been reduced and green links are ineffective or missing

**EN14** - New trees and hedgerows are not assured to be adequate and will take many years before they could match the 100+ trees that will be felled.

**EN15** - Damage to air quality in the wider area due to increased traffic congestion.

**RL6** - Reduction in golf provision at a time when demand for golf is growing

### *Traffic*

- Radius of impact assessment is insufficient and does not consider cumulative impact of other developments
- A single traffic incident causes gridlock already in Caversham
- Traffic will impact on deprived areas of Caversham and wider Borough
- Under estimation of the impacts on infrastructure

### *Pedestrians*

- Details of pedestrian crossing improvements should not be left to reserved matter stage
- Proposed new crossing at Grove Rd/Kimore End Rd junction is impractical
- Additional pedestrian crossing will increase traffic congestion

### *Buses*

- Distance from development to Kidmore End Rd bus stop is excessive
- No bus service improvements proposed

### *Cycling*

- Bike theft is high so will be a deterrent to their use and routes to Emmer Green are insufficient

### *Car Sharing*

- One car share space is insufficient

### *Cars*

- This is a car dependent development and the proposed travel plan will not change that
- The site is not accessible by sustainable transport
- RGC members now travel by car to The Caversham club which is not sustainable

### *Construction Traffic*

- Over 100 heavy vehicle movements a day is dangerous
- Thames Water required road works to water infrastructure will result in widespread disruption

### *Biased Incorrect Traffic Data*

- On-site observations would confirm that these are incorrect, and impact is underestimated
- 38% increase in traffic on Kidmore End Road is not negligible as claimed
- Insufficient assessments which do not consider cumulative impacts of other developments
- Photographic evidence keeps being ignored

### *Traffic Mitigation*

- Proposals will not work
- There is not viable mitigation for the Peppard/Prospect/Henley/Westfield Road junctions

### *SODC Traffic*

- Future development in SODC will add to congestion pollution within RBC
- How will the family golf facility to the north be accessed for maintenance
- HGV's are diverted away from Henley leaving Reading as their only route

### *Pollution*

- Area of assessment is insufficient and not wide reaching enough
- Incorrect benchmark for NO2 has been used
- 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. This this does not comply with Policy EN15.
- RBC's 2019 Clean Air Strategy requires the Council to improve air quality in the shortest possible time - the development is contrary to this
- Contrary to NPPF requirements to reduce traffic and improve air quality
- Air quality impacts on vulnerable children

### *Construction Pollution*

- Incorrect dust calculation - the existing club house to be removed is part 2 storey not 1 storey so how can air quality impact assessment be accepted

### *Increased child Population and impact on Education*

- The Applicants child population impacts are a significant underestimation
- The site is too far away from some schools. Government guidance states children should walk only 2 miles
- School places are already a problem and cannot cope with the extra population

### *Healthcare*

- The underestimated population impacts mean pressure on EGS is even greater and Covid has further compounded this.
- The application includes no commitment for an expanded EGS

### *Housing*

- No guarantee on site affordable housing will be provided.
- The Council's Annual Monitoring Report states that are RBC are already building a significant number of affordable homes
- The proposed housing density and type do not reflect local character or LP requirements

### *Trees*

- Removal of trees is contrary to COP26 objectives and RBC Climate, Tree Strategy and Biodiversity Action Plan objectives
- Replacement trees will not sufficient or effective in terms of absorption of carbon

- There will not be a net gain in trees on site and the applicants tree survey is biased. Shrubs and bushes on the site are disregarded
- Buildings are too close to retained trees meaning future pressure to remove

#### *Ecology*

- Eastern element of the green link connecting to Kidmore End Road is ineffective
- Now RGC have the left the site it will naturally re-wild so biodiversity baseline calculation is incorrect
- Biodiversity calculations are incorrect and based on the most optimistic assumptions
- Impact on birds and animals has been underestimated
- The smaller site allocated in the LP allowed for much more significant biodiversity enhancement on the remainder of the site which is now not possible

#### *Landscape*

- The proposals would result in destruction of 12.15ha of green landscape, 8.4ha more than in the site allocation policy
- Landscape value of the site has been underestimated, it is not urban fringe rather semi-rural parkland linking into the SODC Chilterns landscape area. Current lack of public access does not devalue landscape quality.
- The development will in no way be beneficial to the landscape as claimed
- Hard edge boundary with SODC does not integrate with the landscape and is designed to facilitate more housing to the north
- New open space will benefit new residents but not the existing wider community
- Replacement trees are not a benefit, gardens are too small and out of character with the wider area and light pollution will be unacceptable

#### *Open Space*

- The site has always been publicly accessible for dog walkers
- Emmer Green already has a deficiency in open space, there are far better alternative uses of the land such as an arboretum
- More than 50 buildings surround the site and will be impacted on negatively in terms of amenity
- Many residents have a right of access to the course from their rear gardens which would be lost
- Loss of facilities to The Caversham is not acceptable as this is out of the Borough. There is a shortage of golf clubs and the facilities at The Caversham are worse
- The family golf facility in SODC is not a success
- The proposals for allotments and country park have disappeared from this application

### *Water and Drainage*

- Drainage basins are too close (within 20m) of existing properties to Brooklyn Drive and retained trees. Drainage will not be managed appropriately.
- Proposals to address on-site geological instability (known sink holes) are unclear
- Insufficient engagement with Thames Water and The Environment Agency
- SuDs basins are a hazard and danger to life

KEG have also resubmitted seven papers outlining their objections to the previously refused application (210018) which they again wish to be considered which are summarised below:

### **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 NO<sub>2</sub> concentrations at the site and in Caversham, where NO<sub>2</sub> levels are much higher, it is likely that PM<sub>2.5</sub> levels will be much higher also, which is completely ignored. There are false claims regarding CO<sub>2</sub> emissions from the predicted extra traffic. All this does not comply with Policy EN15.
- The development does not comply with requirements for CO<sub>2</sub> 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.

#### **4.28 READING FRIENDS OF THE EARTH - OBJECTION**

- Disagree with the projected construction and operational phases emissions and impact on air quality which is underestimated and not full assessed.
- Disagree with the projected traffic impacts which is underestimated and not full assessed.
- The proposals do not go far enough in terms of climate change resilience and mitigation.
- Insulation standards unacceptably low and the scheme should aspire to passive house levels in order to be sustainable.
- The proposals are not zero carbon and are paying to off-set this.
- Ground-sourced heating should be utilised
- No discussion of the very substantial impact removing trees has in terms of releasing stored embodied carbon (for example between 100-2000 tons of CO2 are released when these are burned). Replacing like-for-like will take at least several decades to break even in terms of carbon emissions.
- A smaller number of homes and a different style of dwellings would be more appropriate. Use of existing building in a more central location would be a more sustainable approach to providing the new homes Reading requires.

#### **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 and Mix
- Affordable Housing
- Layout / Scale /Landscaping
- Protected Trees, Ecology and Biodiversity
- Transport Matters
- Sustainability
- Impact on Residential Amenity
- Pollution / Water Resources and SUDS
- 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) (2021) 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 119 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 134 also states in relation to 'Achieving well designed places' that 'Development that is not well designed should be refused especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:*

*a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*

*b) 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.'*

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 that accompanies this planning application sets out 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 short form family golf offer on part of the remaining land in South Oxfordshire is now operational. 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 (RGC) is now being provided at The Caversham Golf Club (TCGC). The facility at TCGC 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 TCGC 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 fulfilled by the existing club house facility at TCGC being upgraded. Concerns are noted in relation to whether TCGC 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 close to TCGC but 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 has been demonstrated.

### Loss of undesignated open space

- 6.2.4 The Reading Golf Club is not specifically identified in policy EN7 (Local Green Space and Public Open Space) but 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.



*Aerial photograph of the site*

- 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 2021 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 page 35 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. There is currently 11.44 ha of undesignated open space on site, which is the vast majority of the site. Of this, 3.64 ha would be lost to built form. Meanwhile 3.17 ha would be private residential gardens. It is not considered that private garden areas should be counted as retention of undesignated open space. This is on the basis of Policy EN8 which 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 would be as 6.81 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.

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 Applicant considers 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 off-site 3G pitch provision in the area and towards the upgrade of Emmer Green Playing Fields play area.
- 6.2.13 Under the application refused previously (210018), it was proposed that if the on-site provision of open space was not considered sufficient then 4.4ha of the remaining golf club land, within the applicant’s ownership, but outside the application site, located within South Oxfordshire, would be provided as open space. However, during consideration of the previous application there were significant concerns about the deliverability and management of this off-site and out of Borough space and this uncertainty formed part of the first reason for refusal covering loss of undesignated open space. It should be noted that the current application does not propose any off-site provision of new public open space outside of the Borough.
- 6.2.14 Given the above the key consideration in this instance as to whether the proposals are sufficient to comply with policy EN8 relates to the second part of the policy 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”.
- 6.2.15 In this case, this means comparing the granting of public access and other improvements to 4.63ha of the existing golf course to the loss of 6.81ha of undesignated open space.
- 6.2.16 When the site was in use as an active golf club public enjoyment of the site was restricted to golf club members and a small number of residents who overlook the land but have no access to use it. The proposed provision of public access to 4.63ha of open space, for future occupiers of the proposed development and also to existing residents and the wider public is considered to represent a significant improvement and public benefit.
- 6.2.17 The Applicant is also correct in stating that provision of this publicly accessible open space 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).
- 6.2.18 It is considered pertinent to note that the background paper (EV033 Local Green Space and Public Open Space) which supported adoption of the Reading Local Plan in 2019 did not include the former golf club land as public open space as the site is not publicly accessible but acknowledged it to be ‘undesignated open space’.

6.2.19 Other relevant factors considered to present potential improvements to the remaining open space are proposed tree planting and biodiversity enhancements.

6.2.20 On-site recreation facilities are proposed in the form of a Locally Equipped Area of Play (LEAP) to be located centrally within the site within the public open space park and garden area. This should also be considered in the context of Policy EN9 (Provision of Open Space) which requires that all new development should make provision for appropriate open-space based on the needs of the development, either through on or off-site provision or contributions towards provision of new or improvement of existing leisure or recreation facilities. The policy goes on to state that on sites of 50 dwellings or more, where the availability and quality of existing open space has been identified as deficient, new provision will be sought and that development should ensure satisfactory provision of children’s play areas and neighbourhood parks. The proposed Open Space provision for the development is shown in the table below.

Table of Open Space Provision On Site			
	Quantum Guideline (hectares per 1000 population)	Quantum Required Based On 223 Units (2.4 people per unit)	Quantum Provided On Site
Playing Pitches	1.2	0.64Ha	0ha
All Outdoor Sports	1.6	0.86ha	0ha
Equipped / Designated Play Area	0.25	0.13ha	0.16ha (plus informal play throughout within parks and gardens)
Other Outdoor Provision (MUGAs and Skateboard Parks)	0.3	0.16ha	0ha
<b>Total Formal Outdoor Space Quantum</b>		<b>0.16ha (Play only) 1.63ha (All Sports)</b>	<b>0.16ha (Play only)</b>
Parks and Gardens	0.5	0.27ha	1.01ha
Amenity Green Space	0.6	0.32ha	1.33ha
Natural and Semi-Natural	1.8	0.97ha	1.39ha
<b>Total Informal Outdoor Space Quantum</b>		<b>1.56ha</b>	<b>3.73ha</b>
<b>Total Open Space Quantum</b>		<b>1.72ha (excluding sports)</b>	<b>3.89ha</b>
SuDS (In addition to the above)			0.50ha

6.2.21 The proposal performs well in terms of the open space provision for the development itself in terms of natural areas such as parks and gardens, amenity green space and natural and semi-natural spaces providing areas well in excess of national guidance set out by Fields In Trust on such matters for developments of the scale proposed. In accordance with the Fields In Trust guidance the development is also required to provide an on-site Multi Use Games Area (MUGA) and contribution towards provision/ improvement of a Neighbourhood Equipped Area for play. In this respect as the proposals do not include on-site provision of a MUGA instead it is proposed to provide a £250,000 contribution towards a MUGA being located within the local area (as specified by Sport England) and a further £307,500 contribution is proposed to go towards improvements to play equipment at Emmer Green Playing Fields. These contributions are supported by RBC Parks officers.

- 6.2.22 Policy EN9 accepts that provision of such spaces can be either on or off-site and therefore Officers are satisfied that in terms of Policy EN9 the proposals are compliant. In terms of the wider EN8 consideration the proposed on-site recreational facilities and natural spaces are considered to be further improvements to the areas of retained open space as appropriate for a development of this nature and therefore the weight attached to these in terms of Policy EN8 is more limited.
- 6.2.23 The proposed development also incorporates a net gain in tree planting on the site, focused around the areas of open space to be retained, as well as a number of biodiversity mitigation measures. On-site tree planting and biodiversity matters are considered separately in the following sections of this report. Should these aspects of the proposed development be considered acceptable then they also would also be considered to represent improvements to the open space that is proposed to be retained on site.
- 6.2.24 It is pertinent to consider the current proposals in respect of loss of undesignated space in the context of the assessment of the previous application where reason for refusal 1 stated:
- 1. The application site forms a significant area of Undesignated Open Space within Reading Borough. The application proposals would lead to the loss of a significant part of this space through built form and related enclosed domestic gardens, roads and driveways. The proposal fails to demonstrate 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 and that the off-site compensation arrangement is deliverable. The Layout applied for in this application proposal will therefore lead to an unacceptable loss of undesignated open space on the site/in the local area, contrary to Policy EN8 (Undesignated Open Space) of the adopted Reading Borough Local Plan (2019).*
- 6.2.25 The application site areas for the current proposal and for the application that was refused are the same at 12.15ha. The current proposal is for a reduced number of dwellings at 223, compared to 257 for the refused application. The layout of the revised application and reduced dwelling numbers means that an additional 0.56ha of open space is to be provided as publicly accessible open space within the development.
- 6.2.26 As well as an increase in overall quantum of open space to be retained on site and to be provided as public open space the layout of the site and open space has been amended. Whilst the core part of the open space is still located centrally within the site the overall provision is now less fragmented. This is most notable with the addition of a 200m long strip of open space between 30m and 50m in width along the north east boundary of the site which would connect with the central area of open space creating a significant area of continuous publicly accessible open space. This amended layout is considered to result in an enhancement to the overall provision of open space within the site in terms of

its functionality as open space. The provision of this buffer would also provide residents of Brooklyn Drive, who have some views of the existing golf course from upper floor rear windows, with a visual buffer from the proposed development.

6.2.27 As discussed above, unlike the previous application the current proposals do not propose to secure provision of replacement off-site open space. This previously was in the form of 4.4ha area of land within the Applicant's ownership on the golf course but located in South Oxfordshire to be provided as a country park, community orchard and potential land for allotments. Under the assessment of the previous application it was concluded that the provision of this off-site space was necessary to make the development acceptable in the context of Policy EN8 to compensate for the loss of open space that would result in the application site. However, it was considered at the time that the application failed to demonstrate that these off-site compensatory spaces could be delivered and managed given they would be located out of the Borough. The supporting information submitted with the application also states that the Applicant remains committed to planting 1000 trees on golf club land outside the application site area, but this is not proposed to be secured as part of the application and therefore cannot be a material consideration in the assessment of this proposal.

6.2.28 Given the above, the key comparison in the context of the previous reason for refusal is whether without the off-site compensatory open space provision the increase on site provision of open space and improvements to retained open space are sufficient to outweigh the overall loss of undesignated space.

6.2.29 Officers opinion is that deleting the previously proposed off-site provision outside of the Borough resolves the uncertainty over how that would be delivered or maintained, which formed a part of the reason for refusal based on open space provision. In addition, the Policy EN8 assessment concludes that the increase in total level of on-site open space provision (an increase of 0.56ha), the less fragmented layout of the open space and providing public access to this land, which is currently not possible, represent significant improvements to the remaining open space on the site. Subject to the application satisfactorily demonstrating that it also provides significant on-site benefits in terms of tree and landscape planting and biodiversity enhancements (assessment separately in this report) then Officers consider that the proposed improvements to remaining on site space would, on balance, outweigh the overall proposed loss of open space.

### **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 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 signed a Statement of Common Ground dating from October 2017 to that effect. In broad terms the provision of new housing would accord with the requirements of Policy H1 in meeting the housing needs of the Borough.

- 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 for 2020-2021 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 the LPA can demonstrate above the required 5 years and there is currently a 6.95 years' supply of housing land.
- 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 and as such the provision of new housing should not be given any special or additional weight in planning balance considerations.

#### **6.4 Residential Density and Mix**

- 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 18.35dph or a net density of 29.65dph; when removing the 4.63ha of Public Open Space, SuDS and street planting from the 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 63.7%. It is accepted that this provision in excess of the policy requirement is a material consideration in favour of the development to be considered in the overall planning balance by providing much needed family size housing.

## **6.5 Affordable housing**

6.5.1 Policy H3 (Affordable Housing) seeks residential development to make an appropriate contribution towards affordable housing to meet the needs of Reading. For developments of 10 or more dwellings the required level of provision is 30% of units on site to be provided as affordable homes. The proposed development is policy compliant in this respect and proposes that 67 (30%) of the proposed dwellings would be affordable housing. This would also be at a policy compliant tenure split of 62% Affordable rented accommodation at 'Reading affordable rent' levels - at and 38% Affordable home ownership (shared ownership or another product) in accordance with the adopted Affordable Housing SPD (2021).

6.5.2 Policy H3 also sets out that priority needs for affordable housing is for two or three-bedroom units that can house families. In this respect 85.1% of the proposed affordable housing units would be two bedroom or larger which is again considered to be a benefit of the proposals in providing much needed affordable family sized homes.

6.5.3 Provision of the proposed on-site affordable housing would be secured by way of a section 106 legal agreement.

## **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 130 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 134. sets out that 'Significant weight should be given to:  
a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) 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 NPPF 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 174 (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 Major Landscape Features in policy EN13 and the application site does not form part of a Major Landscape Feature.
- 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 The golf course has an open verdant sylvan character at present when viewed from within the site itself. However, due to the combination of topography, vegetation, but primarily built form, views of the site are limited to those in residential receptors which abut the site boundaries; transient receptors which pass the site on Kidmore End Road; and those receptors at work at school, visiting the community facilities; or the public open space at Emmer Green Playing Fields.
- 6.6.7 The submitted Landscape and Visual Impact Assessment (LVIA) summarises the following identified landscape impacts of the proposed development when operational:

*During operation, the effect on landscape would comprise:*

- *a minor beneficial contribution to the contextual landscape;*
- *a minor beneficial effect from the contribution of tree planting and from the use of appropriate building types to county level landscape character;*

- *ranging from a minor adverse effect on the local landscape due to the change of land use from a golf course to buildings, to a minor beneficial effect on the local landscape due to the additional tree planting to the north of the Site;*
- *effects on landscape character at the Site level ranging from moderate adverse to moderate beneficial;*
- *a major adverse effect on the night-time character of the Site due to an increase in lighting intensity;*
- *ranging from moderate adverse to moderate beneficial effect due to change to Site landscape character, when considering both the introduction of buildings and the proposed landscaping on Site;*
- *a moderate beneficial effect resulting from the change to Site land cover from private amenity grassland to mixed housing and parkland;*
- *moderate beneficial effect arising from the increased public access and footpaths around the Site; and*
- *a moderate-major beneficial arising from an appropriate built height and form in the context of the Site surroundings.*

6.6.8 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 a high quality landscape led scheme to make the most of the opportunity to enhance the site and surrounding area.

6.6.9 It should be noted that unacceptable site layout, scale and landscaping formed the basis of reason for refusal no.2 of the previous application. This reason for refusal stated:

*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;*
- *The poor relationship of the proposed Layout and Scale of buildings and plots would lead to likely future pressure to prune or fell retained, protected trees of high amenity value due to perceived natural ‘nuisance issues’ as a result of the lack of ‘usable’ amenity space unaffected by those retained trees; including Plots 1, 8-15, 21-24, 49, 59-66, 78 & 84 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 open space provision being fragmented and eroded by road infrastructure, often*

*isolated and unusable due to size and shape; resulting in poor quality communal spaces;*

- By building so close to the adjacent open space beyond the site boundary 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 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) of the adopted Reading Borough Local Plan (2019; paragraph 130 of the NPPF (July 2021) and objectives of the adopted Reading Borough Council Tree Strategy (2021) and Reading Biodiversity Action Plan (2021).*

6.6.10 Therefore, it is considered pertinent to address each part of the previous reason for refusal in turn to assess how the layout has changed.

- 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;*

6.6.11 There is now more variety to the layout and groupings of buildings across the proposed development. Notably this now includes a crescent of 9 townhouses in the position of the formerly proposed on-site health care building located towards the Kidmore End Road frontage, albeit this is well set back from the frontage behind tree planting and other landscaping.

6.6.12 Whilst the site is still based around a central spine road access from Kidmore End Road and circular road loop to the northern part of the site the proposed houses are now not located entirely around the exterior of the loop road providing a green buffer and more spacious feel to the edges of the site, particularly to the north east boundary with the rear of the Brooklyn Drive properties.

6.6.13 It is noted that the increase in buffer space to this boundary has reduced the buffer to the north west boundary of the site with the rear of the Eric Avenue properties, however a significant bank of existing trees are to be retained here which provides a buffer to this boundary. Furthermore, properties in this part of the site are now proposed to be situated off a series of small cul de sacs which are considered to add variety to the overall pattern of development within the site.

6.6.14 There is greater proportion and mix of houses proposed overall within the development generally and a significant reduction in number of flats which contributes to a more mixed layout and groupings of buildings.

- *The poor relationship of the proposed Layout and Scale of buildings and plots would lead to likely future pressure to prune or fell retained, protected trees of high amenity value due to perceived natural 'nuisance issues' as a result of the lack of 'usable' amenity space unaffected by those retained trees; including Plots 1, 8-15, 21-24, 49, 59-66, 78 & 84 and 161-164.*

6.6.15 Plots 8-15 were located along the southern boundary of the site with Lyefield Court. The site layout has been amended to move these dwellings and gardens away from the boundary and retained trees instead placing one of the proposed arterial roads on this boundary.



*Plots 8 - 15 Refused Layout*



*Proposed Layout*

6.6.16 Plots 21-41 were also located along the southern boundary of the site. Similarly, to former plots 8-15 above the site layout has been amended to move these dwellings away from the boundary and retained trees, again placing one of the arterial roads on this boundary



*Plots 21 - 41 Refused Layout*



*Proposed Layout*

6.6.17 Plots 59-66 were also located along the southern boundary of the site with Gorselands. Here the density of units has been reduced providing larger garden areas such that pressure to prune retained trees is significantly reduced. Albeit the Natural Environment Officer retains concern with regard to new proposed plot 62.



*Plots 59-66 Refused Layout*



*Proposed Layout*

6.6.18 Plots 161-164 were located to the north eastern corner of the site on the boundary with Brooklyn Drive. This corner of the site now forms part of a continuous band of open space along the eastern boundary of the site with dwellings and gardens now set well in from the boundary.



*Plots 161-164 Refused Layout*



*Proposed Layout*

6.6.19 The Natural Environment Officer still retains concern with the siting of former plot 46 (now 49) in terms of overshadowing from existing trees and future pressure to prune and also identifies issues with new proposed plots 5, 53, 161, 223, 99 & 105. Notwithstanding this, the revised layout does demonstrate a clear improvement in terms of reduced overshadowing and likely future pressures to prune with only 8 incidences of concerns now identified compared to 37 under the previously refused application.

- *Fails to suitably enhance/retain a continuous green link for ecology through the site;*

6.6.20 Policy EN12 (Biodiversity and the Green Network) states that green links can include both public and private land and provide connectivity for wildlife between ecologically important areas. Green links are not precise lines but rather potential connection between areas and do not necessarily mean or imply public access. The policy goes on to state that opportunities should be sought in conjunction with development proposals to enhance the quality and integrity of the green network and that the green network can also fulfil other purposes such as storm water control and air pollution amelioration. Proposals should seek ways to enhance and restore biodiversity and ecology and enhance the quality and integrity of sites, where appropriate, by maximising the inclusion of biodiversity and nature conservation features to best contribute to the interconnectedness of the network. Such measures will need to be effectively managed and maintained through landscape and ecological management plans.



*Green Link through site as referred to under Policy EN12*



*Proposed Site Layout*

6.6.21 In terms of the revised site layout proposed Officers consider that this successfully facilitates retention of the integrity of the green link through the site. The continuous band of open space along the eastern site boundary which connects with the central area of open space forms a significant and continuous area of on-site open space and native planting. The band of landscaping proposed along the central spine road also connects to the central area of open space with Kidmore End Road providing a continuous link through the site. Comments are noted that the green link narrows to the south east of the site along the central spine road towards Kidmore End Road. Officers are satisfied that with the proposed landscape and ecological mitigation measures proposed, including wildlife friendly lighting scheme, good retention of existing mature trees to this part of the site and the level of native replacement tree planting along the spine road that the proposed layout would satisfactorily provide the green link.

6.6.22 Ecological matters are addressed separately in the Ecology and Biodiversity section of this report.

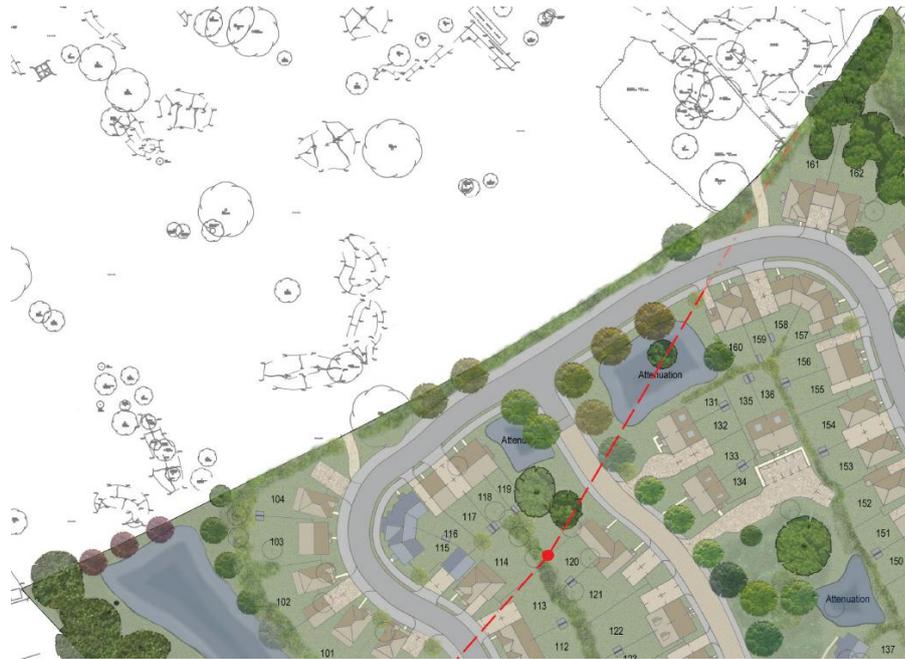
- *There is a failure to provide suitable usable areas of on-site open space for the needs of the residents of the development due to open space provision being fragmented and eroded by road infrastructure,*

*often isolated and unusable due to size and shape; resulting in poor quality communal spaces;*

6.6.23 As set out above in the Open Space section of this report the layout of the open space within the development has also been amended and overall quantum increased. Notably with the addition of the continuous band of open space long the eastern site boundary which connects with the central area of open space and play area. This a band of landscaping along the central spine road also connects the central area of open space with Kidmore End Road. This is considered to result in a less fragmented and more usable provision of on-site open space. Landscaped areas are proposed within the site and the vegetative species and replacement trees proposed within them are considered to be acceptable.

- *By building so close to the adjacent open space beyond the site boundary 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.*

6.6.24 Both the proposed dwellings and northern perimeter road within the development have been set away from the northern application site boundary with the borough settlement boundary. The proposed northern perimeter road would now be located a minimum of 10.5m from the boundary with the rest of the open former golf course land beyond. Previously the separation of the perimeter road was less than 2.5m at its closest point. Houses are also no longer located directly on this boundary in the north east corner of the site where the new area of open space buffer is proposed. A reduced number of houses are also proposed on the boundary in the north west corner of the site, compared to the refused proposal, so that instead of houses located on the north west exterior corner of the northern part of the perimeter road there is now a smaller cul de sac of houses in this position.



Refused settlement boundary layout



Proposed settlement boundary layout

6.6.25 The greater off-set from the boundary in this position also means that a continuous band of landscaping is proposed along the minimum 10.5m buffer to the north of the perimeter road which would soften the transition from the proposed development towards the rest of the former golf club land beyond the settlement boundary in South Oxfordshire and provide an improved landscape setting.

6.6.26 As set out above the dwelling mix is considered to be acceptable. The proposed scale of the dwellings is also considered to be acceptable. The majority of the dwellings are 2 and 2 ½ storey, and the inclusion of the 2 locations for three

storey buildings to accommodate the crescent of townhouses towards the Kidmore End Road frontage and central flatted block are not considered to be unacceptable in principle given the character of the built form surrounding the site. Matters of appearance of sought as a reserved matter so are not under consideration at this stage of the planning application.

6.6.27 In overall terms officers consider that the proposed development has addressed the majority of concerns identified within the reasons for refusal relating to layout of the previous application. Subject to the application satisfactorily demonstrating that it is acceptable in terms of trees, ecology and biodiversity matters considered separately in this report) it is considered that the application results in a layout that would provide a high quality and attractive place to live and is sympathetic to the landscape setting of the site whilst also providing good quality appropriate areas of usable open space and public realm.

#### Wider Area of Landscape

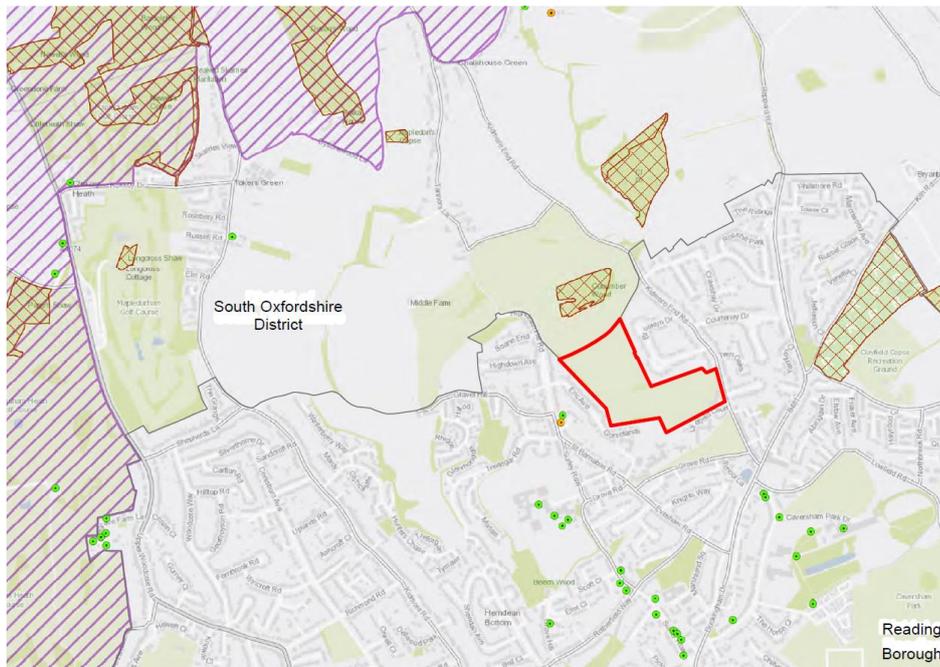
6.6.28 Development of the application site would infill the Reading Golf Club land ownership within Reading Borough. The site at present is bounded on 2 sides by residential and community uses but the northern boundary is open to the remainder of the Golf Course land within South Oxfordshire, with the boundary of the Chilterns Area of Outstanding Natural Beauty set between 1km and 2km 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. The Chilterns Conservation Board (CCB) advise that the south and south-east of the AONB boundary around Kidmore End, is sensitive and falls within the wider setting of the AONB and that much of this landscape would justify the status of a 'valued landscape', consistent with the guidance in the NPPF at 174.

6.6.29 The CCB refer to the announcement of 24<sup>th</sup> June 2021 by Natural England that it will explore a boundary extension to the Chilterns AONB as part of a National Landscapes Review and public consultation on this is currently ongoing (ends April 2022). However, the precise details of how the boundary would be extended has not yet been confirmed.

6.6.30 The CCB have reviewed the submitted proposals and Landscape and Visual Impact Assessment and consider 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. They advise that the topography, local vegetation and built form in and around the current planning application site impacts the immediate visual relationship to the AONB and conclude that there is a landscape character relationship here but accepting the more direct visual relationship is affected by distance and topography. They consider that the site does enjoy a visual link, due to its open character, with the valued landscape between the AONB and the edge of the built settlement.

6.6.31 Overall the CCB advise that the status of the wider valued landscape should be given weight in any planning decision and that a landscape masterplan and management plan should protect and enhance the relationship between the existing site edge and the wider landscape. They note that the applicant has submitted a constraints plan and it is an important landscape consideration that these landscape boundary issues are considered.

6.6.32 The land directly adjacent to the northern application site and RBC borough boundary, where there is no physical boundary at present, is not urbanised in character. Under the previous application there was concern that the proximity of the northern perimeter road loop to this boundary did not allow for meaningful landscaping to ensure integration into the open landscape as it extends towards the Chilterns AONB as well as concerns for light and noise pollution impacting open land. Para 185 of the NPPF requires that the development should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.



*Plan showing surrounding landscape features*

**Legend**

- |  |   |
|--|---|
|  Site Boundary                      |  Grade II* |
|  District Councils                  |  Grade II  |
|  Ancient Woodland Inventory         |   |
|  Area of Outstanding Natural Beauty |   |
|  Local Nature Reserves              |   |

6.6.33 The submitted LIVA sets out that the proposed development has been designed to include a number of embedded mitigation measures including the retention of boundary trees and planting, providing a net gain in on-site tree planting, provision of building heights of predominantly two and two and a half storeys,

provision of on-site publicly accessible open space, other native planting landscaping and sensitively designed lighting scheme.

- 6.6.34 The LIVA summarises the visual and landscape impacts of the development at operational stage taking into account the proposed on-site mitigation measures. A summary table of the identified impacts is set out at Appendix A at the end of this report. (APPENDIX A - LIVA IMPACTS SUMMARY TABLE)
- 6.6.35 The LIVA identifies a variety of beneficial and adverse visual and landscape impacts from the proposed development at operational phase. Effects are projected to be major to moderate adverse significance, on those receptors (in plain speak - humans) in close proximity to the Site where the change in the character and amenity of the view will be readily perceived; and moderate to minor adverse for those receptors where the Site forms part of the wider townscape. For those receptors at community facilities and schools, effects at this stage are predicted to be moderate adverse. Effects on those transient receptors where views of the Site are experienced as part of a journey through the townscape and settlement fringes are predicted to be moderate adverse but minor adverse when planting matures. For those transient receptors using the Public Rights of Way, effects are predicted to be negligible. Effects on those receptors using the public open space are predicted to be minor adverse. Effects on receptors within or travelling through the AONB are predicted to be neutral. These effects will moderate over time and as the replacement planting establishes and the built form weathers.
- 6.6.36 In overall terms Officers are satisfied that the submitted LIVA has fully considered the landscape and visual impacts of the proposed development and has been carried out to an appropriate standard.
- 6.6.37 The LIVA concludes that the proposed mitigation measures within the development would be most effective at limiting the impact of the development of existing local level visual receptors (immediate neighbours) with views of the site, who currently see private golf course land. In this instance by way of securing a development of high quality design (appearance to be secured by way of reserved matters application) and also use of on-site landscaping, tree planting and provision and retention of area of public open space residual visual/landscape impacts to these receptors are expected to reduce from moderate to major adverse to moderate adverse. Whilst these receptors would lose a view of the former golf course land from rear upper floor windows these dwellings predominantly have views of existing residential streets from existing front and side facing windows. It should also be noted that right to a view is not a material planning consideration.
- 6.6.38 The most significant impact of the development identified is the impact on night-time character as a result of additional lighting required to accommodate a residential environment. An assessment of the lighting impacts of the proposed development is included within the LIVA. This sets out that in terms of the night-

time character, the site and the landscape of the Golf Course beyond are predominantly dark due to its current use. The only source of existing artificial lighting within the Site relates to the wall mounted lamps on the Clubhouse and the adjacent Green Keeper's house, located to the south-east corner of the Site. The car park was lit by bollard lightings. However, the site is bordered on both sides by the lit residential streets and domestic lighting at Kidmore End Road, Brooklyn Drive, Highdown Hill Road and Eric Avenue.

- 6.6.39 The introduction of the proposed domestic and street lighting associated with the proposed development would result in an increase in light spill and glare from north-east, east and the west of the site. The main sources of additional lighting from the development would be domestic amenity lighting associated with the proposed dwellings and external security lighting along driveways, lighting to public access areas and street lighting and lighting required to areas of public open space to reduce the fear of crime. The LIVA identifies that the localised impact of the additional lighting to the site would be a major adverse significance.
- 6.6.40 A series of mitigation measures are proposed to lessen the impact of the lighting including the specification of the lighting to be as low as possible in terms of luminance, inward facing, directional, minimise upward spill and backwards glare. Additional mitigation is also proposed in terms of biodiversity impacts of the proposed lighting which the LPA's Ecological Adviser has confirmed would be acceptable in this respect. This includes no 'upward pointing' or bare bulb lights will be installed anywhere on the development, all external lights on lampposts to be no more than 3.5 metres in height with shields to focus light towards footpaths and roads only, provision of no-light zones with the development to protect the boundaries of the site from any artificial light (no lamp posts or other artificial lights to be positioned within 15 metres of these boundaries and no lights to face towards these boundaries). It is also proposed that pedestrian ground lighting would be low level in terms of luminance (not exceed 3 lux), no external lights to be installed on new buildings above a height of 2 metres and all external lighting to be on motion sensors and timers. Full details of the proposed lighting scheme for the development would be secured by way of condition.
- 6.6.41 Given the localised dark nature of the existing golf course the LIVA concludes that even with the proposed mitigation the impact of the lighting would be major adverse to views from within and outside the site, albeit this must be considered in the context of the existing lit residential streets and domestic lighting that directly abuts either side of the application site.
- 6.6.42 As discussed in paras 6.6.24 to 6.6.25 of this report the current application demonstrates some significant changes in terms of how the boundary with the land to the north is treated which is considered to create a softer and more sympathetic transition to the open land beyond, including softer transition to the open space to be retained; the greater set back of the perimeter road and

housing; and a strip of landscape planting between the road the remainder of the open space to the north.

- 6.6.43 In terms of the impact of the development upon the wider and national landscape designations surrounding the site these include the AONB, the Historic Park and Garden of Caversham Park to the south-east and Surley Row Conservation Area to the south (both beyond intervening built form); Clayfield Copse Local Nature Reserve to the east and the areas of Ancient Woodland and Replanted Woodland present in the landscape to the north, west and east of the site. The LIVA concludes that due to the combination of existing built form, topography and vegetation, both within and outside the site and the wider Golf Course, it does not perform a role in the setting to the AONB, nor that the Site displays any Chiltern AONB characteristics and that any impact would be negligible.
- 6.6.44 This view is different to that of the Chilterns Conservation Board (CCB) set out above who consider that the application site 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. They consider that the site does enjoy a visual link, due to its open character, with the valued landscape between the AONB and the edge of the built settlement but acknowledge that anymore direct relationship is affected by the separating distance and topography.
- 6.6.45 Officers opinion is that if the application site is considered to form part of the wider setting of the AONB and wider valued landscape area then the overall impact on these areas would be negligible, notably given the distance and topography between the site and the edge of the AONB. The proposed improvements to the northern boundary treatment to create a softer and more landscaped transition to the remainder of the former golf course land to the north, scale of buildings proposed within the site at predominantly two to two and a half storeys, as well as the increase in overall level of tree planting and quantum of open space provision is also considered to contribute towards an appropriate form of development. In addition, the proposed development would infill the parcel of former golf course land that is surrounded by established residential streets to three of its boundaries and the extent of development is not considered to appear out of context with the character of edge of settlement residential areas in this part of Caversham, particularly in terms of lighting impacts on night time character. The proposals would not project the general edge of settlement line of this part of Caversham closer to the AONB.
- 6.6.46 Officers are satisfied that subject to the recommended conditions and section 106 obligations the proposals would satisfactorily protect both local and longer-range landscape views of the site. The proposals are considered to have overcome reason for refusal no.2 of the previous application (210018).

6.6.47 In terms of heritage impacts policy EN1 (Protection and Enhancement of the Historic Environment) seeks that development should protect and where possible enhance the significance of heritage assets including their setting whilst Policy EN3 (Enhancement of Conservation Areas) seeks that the special interest and character of Conservation Areas is protected and enhanced. There are a series of Listed Buildings scattered throughout the wider townscape. Old Grove House (Grade II\*) and The Barn (Grade II) at Highdown Hill Road are the closest to the Site but are located over 125m from the application site with existing built form of a residential street in between. The proposals are not considered to materially impact on the setting of these listed buildings. Surley Row Conservation Area is located over 400m from the application site and similarly separate by built form and residential streets such that there is not considered to be any impact of the setting of this Conservation Area.

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

6.7.1 Policy CC7 (Design and Public Realm) states that all new development should be of high design quality that maintains and enhances the character and appearance of the area including by way of landscaping. Policy EN12 (Biodiversity and the Green Network) states that planning permission will not be granted for developments which would negatively impact on the 'green network' including 'Green Links' and that on all sites development should not result in a net loss of biodiversity and provide for a net gain in biodiversity where possible.

6.7.2 Policy EN14 (Trees, Hedges and Woodlands) seeks that individual trees, groups of trees and hedges will be protected from damage or removal where they are of importance, that Reading's vegetation cover is extended, and that the quality of waterside vegetation is maintained or enhanced. New development shall make provision for tree retention and planting to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change.

### *Trees*

6.7.3 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.

6.7.4 The information submitted in support of the application states that there are 320 trees or groups of trees on or near the site and that of these existing trees 11 are high quality (category A) and comprise English oak and Scots pine; 119 are moderate quality (category B); 174 are low quality (category C) and 16 are unsuitable for retention quality (category U). The proposed development would require removal of 112 trees (35% of existing on-site tree stock) (223 to be retained) to allow the construction of the dwellings, parking spaces and associated infrastructure. Of the trees to be removed 15 are considered to be of

moderate quality (category B), 73 are low quality (category C) and 9 are considered unsuitable for retention quality (category U).

- 6.7.5 The Council's Natural Environment Officer's comments are provided in the consultation section earlier in this report. In general terms the information submitted on the number and condition of trees on site and the justification for the trees proposed to be felled and the proposed replacement and additional tree planting, has been carefully considered by the RBC Natural Environment Officer who agrees with these findings and confirms that these trees should not represent a constraint to development.
- 6.7.6 The application proposes that 196 trees new native trees would be planted across the site. These would be provided at a 1:1.75 replacement ratio and would provide for a net gain of 84 trees. The RBC Natural Environment Officer recognises that this is a notably greater number of new trees to be planted than under the previous application (which provided for a net gain of only 4 trees) and is considered to be acceptable in principle. Whilst the proposed loss of existing trees is unfortunate, redevelopment on the scale of that proposed would not be possible whilst retaining all trees - some of which are likely to have been felled anyway on arboricultural grounds.
- 6.7.7 The application proposes that where new hard standing is proposed within the root protection areas (RPA's) of new trees these would be constructed using a no-dig specification to ensure no harm to these trees. The RBC Natural Environment Officer advises that this an acceptable approach with full details to be secured under condition for a detailed arboricultural method statement to be approved as a pre-commencement planning condition.
- 6.7.8 Consideration of the proposed development layout and impact on retained trees (pressure to prune) is set out above in the layout section of this report. In respect of technical arboricultural matters engineered foundations will be required to accommodate some trees which would also be subject of a detailed arboricultural method statement to be secured by condition. Given the close relationship of retained trees to a number of dwellings it is proposed that a condition be attached to remove permitted development rights relating to domestic extensions and outbuildings for affected dwellings which otherwise could not be controlled by the LPA and would have potential to result in harm to a number of retained trees.
- 6.7.9 Principles of how the proposed landscaping and open space areas would be managed and maintained are indicated in the supporting documents - the general approach of which is acceptable but full detail of this would be secured by condition. Responsibility for active management maintenance of the on-site opens space areas would be secured by way of a section 106 legal agreement.
- 6.7.10 Subject to recommended conditions and s106 obligations it is considered that the proposed have demonstrated compliance with Policies EN14 and CC7.

### *Ecology*

- 6.7.11 As set out in the consultation section above the ecological survey work undertaken to inform the application (as reported in 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, there is no reason not to approve this application in terms of the impact on protected or priority species.
- 6.7.12 The application proposes a series of ecological mitigation and enhancement measures are to be incorporated within the development. These include native tree and landscaping planted across the site, ecologically sensitive lighting to avoid impacts on bats, a minimum of 20 bat boxes on trees, a minimum of 20 bat roosting features on new buildings, a minimum of 20 bird boxes on trees, a minimum of 10 swift boxes and 10 house sparrow boxes to be integrated in new buildings, a minimum of 5 large log piles, provision of a minimum of 10 hedgehog houses and creation of hedgehog highways through the site.

### *Biodiversity*

- 6.7.13 Policy EN12 specifically 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.”

- 6.7.14 The previous application (ref: 210018) was refused on the grounds that:

“4. The proposal results in a net loss of biodiversity within the site. 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 Policy EN12 (Biodiversity and the Green Network) of the adopted Reading Borough Local Plan 2019 and paragraph 180 of the National Planning Policy Framework (July 2021).”

- 6.7.15 The previous application was accompanied by a Biodiversity Impact Assessment calculation (BIC) that concluded that without offsite mitigation the development would result in the loss of 4.83 Habitat Units (HabU) [31.88 before development and 27.05 after] and an increase in 2.66 Hedgerow Units (HedU). For this previous application the RBC Ecology Adviser advised this was likely an underestimation and as such it was proposed to off-set the loss of habitat of land by enhancement to land outside the application site on the remainder of the golf course but within South Oxfordshire by way of a s106 agreement, but as discussed earlier in this report Officers had concerns about securing provision, management and maintenance of this out of Borough land.
- 6.7.16 The current revised application has been accompanied by a new BIC that concludes that the proposals will result in a net gain in 4.4 HaBu (36.29 Habu before, 40.69 Habu after) and 4.41 HedU (8.89 HedU before and 13.3 after) without any offsite mitigation resulting in a projected 12.1% on-site net gain in biodiversity.
- 6.7.17 As set out in the consultations section of this report above there is a difference of professional opinion between the Council’s Ecology Adviser in terms of how the BIC has been carried out. Given this disagreement on such a pertinent and technical point advice from a third-party ecologist has been sought on the matter.
- 6.7.18 The full comments from the third-party ecological adviser are also set out in the consultations section of this report. The advice given outlines that the key points of contention are discrepancies/differences of opinion in relation to:
1. assessment of the baseline, including comparison with a previously submitted (and refused) application - 210018;
  2. categorisation of the habitats present (urban trees or broadleaved woodland or parkland) within the site;
  3. discrepancies in relation to the total area of the site; and
  4. likelihood of success of the proposed habitats to be created.
- 6.7.19 In terms of the difference between the result of the BIC for the previous application and that for the new application the advice states that no meaningful comparisons should be drawn and that it would be highly unlikely for the results of the BIC’s would be the same given the two schemes are different in design and also given a different version of the Defra BIC metric was used for each. The

previous application was considered under metric 2.0 however the current application is covered under the updated metric 3.0 and it is this point that is considered most relevant.

- 6.7.20 The third-party advice received also advises that in terms of categorisation of habitats present they consider that the Applicant's Ecologist has made appropriate decisions in terms of the classifications given. The advice notes that: *'Whilst there is no perfect solution to categorise scattered trees as part of the Biodiversity Metric 3.0, the Applicants Ecologist have in fact identified three types of habitat relating to trees within the proposed development site: urban trees; tree lines; and lowland mixed deciduous woodland. Aside from the parcel of woodland to the north, habitats with trees are present as part of a matrix formed of amenity grassland and immature, scattered trees. It is agreed that these cannot be considered as woodland due to the lack of closed canopy, managed amenity grassland ground flora and presence of many trees below 5m. Similarly, the habitat is not parkland as this supports veteran/ancient trees not present in this case. Therefore, it is agreed that the Applicants Ecologist has determined the most suitable habitat category in Urban Trees and it is agreed that consideration of the habitat as woodland would be an inaccurate representation of the current baseline'*.
- 6.7.21 In terms of discrepancies between the total area of the site within the BIC the third-party advice is that under metric 3.0 both trees and amenity grassland are considered as habitat and as such where they exist together the baseline site area increases above that in plan form. The advice also notes that when this occur the double counting is excluded from the overall site area calculation but would account for the difference between the current and previous application which was carried out under metric 2.0.
- 6.7.22 With regard to the disagreement with about the likely success of proposed habitats within the development the third party advice agrees with the LPA's Ecology Adviser that at operational phase the proposed development is unlikely to result in 'good' condition habitats and that they would likely more appropriately be categorised as 'moderate' quality' given likely usage patterns on a residential site, even with regular management and maintenance.
- 6.7.23 The third-party ecological advice received concludes that on the basis of the above the proposals would achieve a net gain in on-site biodiversity but that this would be at a reduced level compared to the 12.1% projected net gain set out within the Applicants Ecological report. The third-party advice considers that the on-site net gain would be between 1.7% and 4.4%.
- 6.7.24 Officers are satisfied that the third-party ecologist has provided clear reasoning and fairly assessed both the proposals and comments of the Applicant's Ecologist and the LPA's Ecology Adviser, who has confirmed acceptance that there would be a small biodiversity net gain on-site, but that a contribution towards off-site biodiversity enhancements within the local area should be secured to provide for

a minimal overall 10% net gain in biodiversity. This would be secured as part of the section 106 agreement. On the basis of this Officers accept that the proposals would result in an on-site net gain in biodiversity which would accord with the requirements of Policy EN12 and would overcome reason for refusal no. 4 of the previous decision.

6.7.25 Conditions are recommended to secure submission, approval and implementation of a habitat and biodiversity enhancement and management schemes as well as a scheme of external lighting to ensure opens spaces and the proposed ecological and biodiversity mitigation proposed is fully implemented. A section 106 obligation would also secure ongoing maintenance responsibilities all on-site open space. A condition is also proposed to secure a construction environmental management plan (CEMP) to manage how the development would be constructed without adversely impacting on retained habitats and biodiversity.

## **6.8 Transport**

6.8.1 Policies TR3 (Access, Traffic and Highway related matters), TR1 (Achieving the Transport Strategy) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking related matters for new development.

6.8.2 The comments from RBC Transport are set out in detail in the consultee section above.

6.8.3 The site allocation Policy CA1b states in terms of transport matters that development on the site should:

- 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;

6.8.4 Whilst the above policy is not directly relevant to the proposed development it provides a guide as to the pertinent issues that a development of similar or greater scale on the site should address.

### ***Site Accessibility***

6.8.5 Kidmore End Road is a single carriageway local distributor road operating a speed limit of 30mph. No parking restrictions apply along Kidmore End Road in the vicinity of the site with on-street parking on the eastern side of the carriageway between the junctions of St Benet's Way and Grove Road, creating a narrowing of the road. 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.

- 6.8.6 A footway is provided on the western side of Kilmore End Road, which is approximately 1.5m wide and is segregated from the main carriageway by means of a 2.5m-wide grass verge. However, the width of the footpath 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.
- 6.8.7 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). Reading Train 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.

#### *Means of Access*

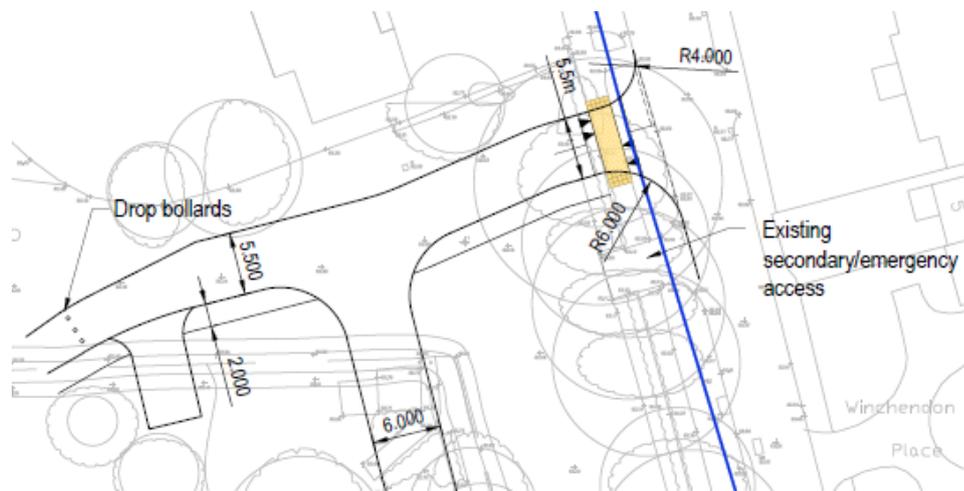
- 6.8.8 The site is situated on one of the Borough's Local Transport Corridors classified as the C107, where all proposals are required to comply with Reading Borough Council's Design Guidance for Residential Accesses on to Classified Roads to ensure that the safety and efficiency of the classified road network is maintained and enhanced by the design for access to new development. Therefore, Officers are satisfied that the proposed access modifications have been assessed carefully to ensure good design standards are achieved, especially with respect to layout and visibility.
- 6.8.9 The proposed **primary vehicular access** serving the residential development will be located on the eastern boundary of the site from Kidmore End Road, in a similar location to the existing car park access to the Golf Club. The access is shown on the drawing below. The existing northbound bus stop located on Kidmore End Road will be relocated north to accommodate the proposed site access.



*Proposed Primary Site Access Layout*

- 6.8.10 The vehicle tracking provided within the Transport Assessment (TA) indicates that the access can accommodate both a refuse vehicle and rigid truck 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. Visibility splays have also been demonstrated to an acceptable standard. In terms of design, the layout of the primary access serving the residential accommodation is acceptable and complies with adopted policy.
- 6.8.11 The TA states that Reading Buses are supportive of the principle of the development as it offers to increase local bus patronage as the current bus stops could serve the residential development without amending the current service. However, 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. The internal road has been designed at 5.5m wide, in line with RBC design guidance, but includes a 1m verge that could be used to widen the carriageway in future to enable a bus route within the site to connect into the possible North Reading Orbital Route as set out in the Reading Transport Strategy 2036.
- 6.8.12 The existing northbound bus stop will need to be modified. A concept layout of the modified bus stop has been provided and the detailed design would be secured as part of the section 106 agreement.
- 6.8.13 The existing secondary access to the north also from Kidmore End Road has been maintained, however it has been slightly relocated and improved to include a footway and informal crossing with tactile paving. This will provide general vehicle access to the crescent apartments only. This access will also form an emergency access with a droppable bollard into the site. The junction design is

shown below. Given this is an existing access there are no highway grounds to object to its retention within the development.



*Proposed Secondary Site Access Layout*

6.8.14 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. A Walking and Cycling Links Plan with the application illustrates potential locations for walking and cycle lanes on and connecting to this land but these off-site links do not form part of the planning application proposals. The family orientated short form golf facility to the north of the application site is located on South Oxfordshire District Council (SODC) land. Upgrades to this facility are subject to SODC planning application ref P21/S2089/FUL (under consideration). Land to the north of the development site within South Oxfordshire administrative area will be accessed via Tanners Lane and all the traffic associated with the reduced leisure offering will be directed to the road network in South Oxfordshire.

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

6.8.15 Policy CC6 (Accessibility and the Intensity of Development) 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.”***

6.8.17 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.

- 6.8.18 To improve pedestrian facilities in the local area, new raised informal crossings, 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 and at junction of Kidmore End Road and Peppard Road. This facilitates an alternative pedestrian route and avoids the narrowing of the existing Kidmore End Road footway, taking people to the other side of the road where the footpath is wider.
- 6.8.19 Pedestrian and cycle access into the residential development will be facilitated from the main site access on Kidmore End Road. Footways and cycle routes are proposed within the development for greater permeability within the site through landscaped areas between properties. All streets within the development, other than the main street, will be designed as quiet roads suitable for walking and cycling. Details of the surfacing of pathways and routes would be secured by condition to ensure they are suitable for all users including pedestrians, cyclists and disabled users.
- 6.8.20 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. All new dwellings would be within 800m of the bus stop.

### ***Public Transport***

- 6.8.21 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 bus service contribution of £50,000 a year for the duration of the build for a minimum of 3 years and a maximum of 5 years is to be secured by way of a section 106 agreement.

### ***Internal Layout***

- 6.8.22 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.

- 6.8.23 The proposed layout has been designed to achieve 20mph Manual for Streets forward visibility. Full details will be designed through Reserved Matters and conditions which is acceptable to the Highway Authority.
- 6.8.24 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.
- 6.8.25 The TA states that the development will be designed to accommodate appropriate vehicles used for servicing and deliveries. Full details of servicing arrangements would be secured via condition.

### ***Parking & Cycle Parking***

- 6.8.26 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.
- 6.8.27 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 the following parking provision (table 4.4. below).

Table 4.4: Vehicle Parking Standards (Zone 3)

Land Use	Unit Type	RBC Parking Zone 3
C3 Residential	1-bed apartment	1.5 per unit
	2-bed apartment	1.5 per unit
	3+ bed apartment	2 per unit
	1-bed house	1 per unit
	2-bed house	1.5 per unit
	3+-bed house	2 per unit
	Visitor Parking	1 space per 4 dwellings (apartments only)

- 6.8.28 The development comprises predominantly two, three- and four-bedroom houses with garage and/or driveway parking. The car parking provision proposed for the site is shown in Table 4.5 below.

Table 4.5: Car Parking Provision

Unit Type	Number of Units	Number of Spaces
1-bed Apartment	6	9
2-bed Apartment	6	9
1 Bedroom Maisonette	4	6
2 Bedroom Bungalow	3	6
2-bed House	64	128
3+-bed House	140	280
Visitor Parking		4
<b>Total Residential</b>	<b>223</b>	<b>442</b>

6.8.29 A total of 442 parking spaces are provided for residential properties which complies with the Council’s parking standards and is acceptable. Visitor parking has been calculated based on the number of flats provided within the development only at a ratio of 1 space per 4 dwellings. 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, a condition is proposed to secure that the garages are retained for vehicle parking only to ensure that they are not converted to living accommodation under permitted development rights which would adversely impact on parking provision for the development.

6.8.30 Accessible parking is also provided in accordance with RBC’s parking standards (5% of the total parking capacity). Accessible parking has also been provided above 5% in communal parking areas.

6.8.31 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.*

6.8.32 The development proposes to provide an active charging point for electric vehicles at all houses that have dedicated off-street parking. Active charging points will be located within communal parking areas for the apartments and homes at a percentage greater than 10%. This proposed provision is acceptable

and full details and provision of the charging points would be secured through condition.

- 6.8.33 Provision of an on-site car club would also be secured for a minimum of five years by way of section 106 agreement.
- 6.8.34 RBC Transport Officers are satisfied that cycle parking for the development can be satisfactorily accommodated within the development in accordance with the standard set out in the Revised Parking Standards and Design SPD. It is proposed that cycle parking for the houses will be provided within garages and that where this is not possible dedicated secure cycle parking will be provided. Full details would be secured by way of condition.

*Person Trip Analysis*

- 6.8.35 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.
- 6.8.36 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 (obtain from TRIC's) which is outlined in Section 5 of the Transport Assessment.
- 6.8.37 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.
- 6.8.38 Although this is a complex assessment, a comparison has been made between the TRICS vehicle trip data and the applicant's assessment. The TRICS vehicle

trip data represents a similar outcome than that presented in the TA. 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. The Highway Authority are satisfied that the vehicle trips identified by the applicant are a robust assessment of the proposed development.

#### *Highway Impact*

- 6.8.39 To establish the existing traffic flows within the vicinity of the application site, Traffic count survey data has been collated by means of Manual Classified Turning Counts (MCTCs) carried out on Tuesday 25th June 2019 (prior to any road works in the area) and Automatic Traffic Counts (ATCs) between 22nd and 28th June 2019. This identifies that the survey data throughout the week is relatively consistent and does not substantially differ from day to day.
- 6.8.40 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.
- 6.8.41 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.
- 6.8.42 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.
- 6.8.43 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.
- 6.8.44 The capacity assessment demonstrates that the proposed site access junction, and the Grove Road / Kidmore End Road operates efficiently and causes minimal delay to traffic on Kidmore End 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.

*Peppard Road / Kiln Road / Caversham Park Road*

- 6.8.45 The capacity assessment at the junction of Peppard Road / Kiln Road / Caversham Park Road show that the Caversham Park Road approach is predicted to operate with relatively high queues and delays in 2026 in the AM peak hour. 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.
- 6.8.46 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. This 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 2026 future year with development. A junction improvement scheme is proposed to mitigate the predicted increases by widening the junction entries.
- 6.8.47 The proposed junction improvement scheme predicts that the junction will have 15 less vehicles queuing and approximately 160 seconds less delay when compared to the 2026 baseline. The proposed scheme mitigates the increase in traffic volumes generated by the development and reduces the queue lengths and delay below the 2019 base line event. This is therefore acceptable. The junction improvement works will be secured through the S106 process with a highway agreement required to be entered into for works undertaken on the public highway.

*Peppard Road / Prospect Street / Henley Road / Westfield Road signalised control junction*

- 6.8.48 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 to be secured as part of the section 106 legal agreement.

### *Off-Site Highway Works*

- 6.8.49 Informal imprint crossings, either at carriageway level with dropped kerbs, or raised comprising a flat-top speed hump with a Duratherm herringbone imprint, are proposed on both site access junctions, Kidmore End Road, Lyefield Court at its junction with Kidmore End Road, and on Grove Road at its junction with Kidmore End Road. These traffic calming measures can improve traffic safety at the junction by slowing vehicles down when entering and exiting the junction or if not raised they also increase visibility of pedestrians to other road users. These informal crossings will be provided with tactile paving to facilitate the crossing of visually impaired pedestrians. An imprint crossing is also proposed at the Kidmore End Road / Peppard Road junction. 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).
- 6.8.50 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. Details of this would be secured as part of the section 106 agreement.
- 6.8.51 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. A concept drawing of the proposed pedestrian improvements is provided with the TA and a Stage 1 Road Safety Audit has been undertaken.
- 6.8.52 As noted above, it is proposed to widen the junction entries on both Caversham Park Road and Kiln Road to allow left and right turning traffic at the give way line simultaneously. This improvement to the junction should allow vehicles currently caught behind cars in a single line to arrive at the give way line more quickly than at present and reduce queuing and delay at this junction.
- 6.8.53 In principle, the proposed pedestrian priority measures are acceptable. 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*

- 6.8.54 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 and nearby schools or medical facilities. Therefore, a detailed Construction Method Statement is to be secured by condition prior to commencement of the development to ensure the amenity effects of construction are effectively managed. 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. Contact details and a “helpline” should be provided so that problems can be reported and dealt with swiftly.

- 6.8.55 Subject to the recommended conditions and s106 obligations it is considered that the proposals would be acceptable in respect of transport and highway related matters.

## **6.9 Pollution / Water Resources / SUDS**

- 6.9.1 Policy EN15 ‘Air quality’ and EN16 ‘Pollution and Water resources’ will only permit development where mitigation measures can be provided 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 it is requested that a 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 local air quality and for the site.
- 6.9.2 Construction and demolition phase works 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. 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.
- 6.9.3 Officers would also seek that the developer liaises with the adjacent Emmer Green Primary school and residents about issues and particular noisy/dusty works and offer quiet periods in the day taking into account the school day. These matters can be included within a S61 as set out above. In practice the measures identified by Environment Health colleagues mirror those sought by RBC Transport in terms of managing development sites.
- 6.9.4 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 appearance. Acceptable noise level ratings for all plant to adhere to can also be imposed by condition.

- 6.9.5 In relation to Contamination officers have considered the details submitted with the application and raise no objections but have recommended conditions to safeguard the amenity of existing and future occupiers.
- 6.9.6 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. Thames Water confirm that foul water network improvements would be required, and a condition is recommended to secure confirmation of these works. The application indicates that surface water will not be discharged to the public network and they have no objection, subject to approval from the Lead Local Flood Authority as set out below. It is also noted that Thames Water has not been able to confirm that the existing water supply network could accommodate the needs of this development but have recommended a condition to deal with this. .
- 6.9.7 In relation flooding the application site is located within Flood Zone 1 classified with a Low Probability of flooding from rivers and the sea. The proposed drainage system creates drainage basins in which surface water is drained. The infiltration basins would discharge the surface water at the greenfield run off rate for the site which would therefore be no worse than the existing situation. The comments from the lead Flood Authority as are set out above and confirm that the submitted drainage proposals are acceptable subject to a condition to secure an implementation timetable and management and maintenance strategy.

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

## **6.10 Sustainable Development**

- 6.10.1 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 or to connect to existing decentralised energy system if there is one within the vicinity of the site.
- 6.10.2 The proposed renewable energy strategy for the development includes use of individual air source heat pumps (ASHP's) which will avoid the need for use of gas fossil fuel within the development. Photovoltaic panels are also proposed to

be installed on the roofs of the new dwellings with an equivalent area of 40% of the ground floor of each dwelling proposed.

6.10.3 Reason for refusal no. 5 of the previous planning application ref. 210018 stated that:

*5. The proposal has failed to demonstrate that the development has been designed to incorporate measures to adapt to climate change; provide sufficient justification of the proposed decentralised energy provision and achieve zero carbon homes contrary to Policy CC3 (Adaptation to Climate Change), CC4 (Decentralised Energy), H5 (Standards for New Housing) of the adopted Reading Borough Local Plan 2019 and the adopted SPD 'Sustainable Design and Construction' 2019.*

6.10.4 The proposed development does not include provision of an on-site decentralised energy system such as district heating. The energy and sustainability statement submitted with the application includes a feasibility study of such installations. The report identifies that there are no existing decentralised energy systems in the vicinity of the application site which the proposed development could connect to. In terms of providing a centralised heat generation plant officers acknowledge and accept the finding that such installations are more suited to high density developments and that in this instance the particular circumstances and location of the site as a lower density development do not lend itself to a centralised heat generation plant for the development as whole. This is because in low density schemes pipes need to be routed under gardens and this leads to access requirement problems. Also, there is poor carbon performance from heat loss given the pipe work distance meaning higher temperatures have to be obtained to ensure water reaches destinations at the correct temperature. This is why such systems generally provide efficient performance in higher density flatted type developments. Officers are satisfied that the proposals have demonstrated compliance with Policy CC4 in terms of demonstrating that decentralised energy is not feasible on this site.

6.10.5 Other sustainability measures are proposed to be incorporated within the development and these include thermal insulation and glazing exceeding good or best practice guidelines, energy efficient LED lighting, high efficiency heat recovery ventilation systems, low flow water conservation appliances. These measures, as well as the proposed ASHP and photovoltaic panels, are considered to demonstrate compliance with Policy CC3.

6.10.6 Policy H5 and the Council's adopted Sustainable Design and Construction SPD (2019) requires that in order to achieve zero carbon homes standards all development must, as a minimum, achieve a 35% improvement in the dwelling emission rate over 2013 Building Regulations Standards with financial contribution required to off-set any remaining carbon emissions to zero. The improvement of the dwelling emission rate is measure by way of a SAP (Standard Assessment Procedure). In consideration of the previous application it was

considered that the application failed to demonstrate that the correct SAP assessment procedure had been followed. The adopted Sustainable Design Construction SPD states the following for SAP Assessments:

*Where a SAP assessment is required to demonstrate compliance with policy H5 for new-build residential, applicants are expected to use SAP 2012 carbon emission factors, as well as updated (SAP 10) carbon emission factors, to assess the expected carbon performance of a new development. Applicants should undertake this approach until such time as central government adopts the new Building Regulations, at which point only SAP 10 emission factors shall be used. Applicants should continue to use the current Building Regulations methodology for estimating energy performance against Part L 2013 requirements as set out in Policy H5 but with the outputs manually converted for the SAP 10 emission factors. This is for demonstrating performance against planning policy targets and is separate to Building Regulation compliance*

6.10.7 The submitted energy and sustainability report details that the carbon performance of the development has been assessed using the methodology outlined in the SPD using the current building regulations methodology (SAP 12) but with the outputs covered for SAP 10 emission factors. This demonstrates an 85% improvement in carbon performance of the development above 2013 building regulation requirements and well exceeds the minimum 35% improvement sought by Policy H5. The remaining 15% to achieve zero carbon performance would be off-set by a financial contribution of £135,000 in accordance with the methodology outlined in the SPD to be secured by way of s106 legal agreement. This money would be ring-fenced for carbon saving, energy efficiency and renewable energy projects in Reading.

6.10.8 The proposed development is considered to have demonstrated compliance with the requirements of Policies CC2, CC3, CC4 and H5.

#### **6.11 Impact on residential amenity**

##### *Existing Residential Properties*

6.11.1 As set out above the proposed layout and scale of the 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 between existing and 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). Outlook for existing residents who look out on to the application site would be altered through the proposed built form

and lighting. However, given the separation distances and lighting mitigation proposed this is not considered to result in any significant detriment to these existing occupiers. It should be noted that right to a view is not a material planning consideration. Whilst the existing dwellings on the Kidmore End Road frontage and Lyfield Court do not have a back to back relationship with the proposed development adequate separation distances are also achieved to these dwellings.

#### *Future residents*

- 6.11.2 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 are also provided in line with Policy H10 for flatted units where communal space is accepted, and the final appearance of the dwellings is to be determined at the reserved matters stage. In relation to the individual houses proposed these would all be served by private garden amenity space, the quantum of which for each is considered to be acceptable. As outlined earlier in this report the presence of retained mature trees in rear gardens of a small number of dwellings may impact on the usability of some of the gardens but given the small number of dwellings impacted Officers are satisfied that in overall terms the proposals would comply with Policy H10.
- 6.11.3 The layout also demonstrates that the relationship of dwellings within the site to each other is satisfactory to ensure that dwellings have adequate privacy, little 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 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. These matters can be resolved by requiring by condition that internal layout details are provided at reserved matter stage to adhere to 'Secure by Design' principles.
- 6.11.4 In terms accessibility 12 units (5.3%) (9 apartments and 3 bungalows) within the development will be fully wheelchair accessible in accordance with the requirements of Policy H5. All will have dedicated wheelchair accessible parking. Accessible parking has also been provided above 5% in communal parking areas.
- 6.11.5 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. This is considered acceptable at outline stage.

## **6.12 Archaeological Significance**

- 6.12.1 Paragraph 195 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 has been considered within the submitted Environmental Statement. 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.
- 6.12.3 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 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 Reading Borough Council Officers are satisfied 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.

6.13.5 The proposal is therefore considered to be in accordance with Policy M2 of the Replacement Minerals Local Plan (RMLP).

#### **6.14 Community Facilities**

##### *Healthcare*

6.14.1 As set out above Policy CA1b does not apply to the development, which refers to provision of on-site infrastructure, including healthcare, but 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.

6.14.2 The previous application included provision of 600m<sup>2</sup> on-site health centre which was supported in principle. However, concerns were raised by the existing Emmer Green surgery in relation to whether the proposed building would meet the requirements of local practices and the Clinical Commissioning Group and the indication was that a new standalone or satellite facility was not of interest nor something that there was a desire to manage. Strong preference was indicated that expansion of the existing Emmer Green Surgery would be a preferred option.

6.14.3 This has been acknowledged by the Applicant under the current application and the proposals now include a financial contribution of £550,000 towards providing health care facilities at the existing Emmer Green Surgery or somewhere else within the wider area. The proposed figure is based upon the costing of the on-site standalone facility that was proposed to be provided under the previous application to provide an equivalent level of provision under the current application. The proposed contribution would be secured by way of the s106 legal agreement.

##### *Education*

6.14.4 RBC Education Officers have confirmed that the expected pupil yield from the development would be up to 110 primary pupils. As set out in the Council's Section 106 Obligations Supplementary Planning Document Community

Infrastructure Levy money from new development would go towards education infrastructure for early years, primary and secondary education.

## **6.15 S106 / CIL**

6.15.1 In relation to the community infrastructure levy, the applicant has completed a CIL liability form with the submission. Based on the 2021 residential CIL rate of £156.24 per square metre the current broad estimate is £3,360,720. However, with provision of all on-site 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 which could reduce the levy to around £2,461,561.

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. As discussed above there are a number of obligations proposed to be secured by way of a section 106 legal agreement which would include:

1. Provision of 30% on-site Affordable Housing at a tenure split of 62:38 (Affordable Rent / Shared Ownership) in line with the current Affordable Housing SPD 2020. Provision of an equivalent financial contribution towards provision of off-site affordable housing should the on-site units not be provided.
2. A contribution of £550,000 towards local healthcare provision
3. A contribution of £135,000 towards carbon off-setting
4. A contribution of £557,500 towards open space and leisure facilities in Emmer Green (including £250,000 towards provision of a 3G sports pitch)
5. Provision of a Construction Phase Employment, Skills and Training and monitoring of this or equivalent financial contribution towards local skills and labour training.
6. Provision of a car club for a minimum period of 5 years and financial contribution of £10,000 to assist funding of a local Car Club provider, including provision of two on-site car club spaces
7. A contribution of £25,000 towards public art
8. A contribution of £50,000 a year (for a minimum of 3 years and a maximum of 5 years) to support bus services serving the site within the Caversham area.

9. A contribution of £50,000 to facilitate the appropriate changes at the junction of Peppard Road / Prospect Street / Henley Road / Westfield Road signalised control junction to increase capacity at the junction.

10. To enter into a highway agreement for junction improvements to the Peppard Road / Kiln Road / Caversham Park Road to mitigate the predicted increases, in accordance with the proposed mitigation scheme illustrated on Drawing 45675/5511/005 and Figure 7.1 of the TA.

11. To enter into a highway agreement to secure off-site highway works for pedestrians' improvements within the vicinity of the site as shown on concept drawing 45675/5511/004 and relocation of bus stop on Kidmore End Road as shown on concept drawing 45675/5510/001

12. To provide and manage all areas of on-site open space. Submission, approval and adherence to a maintenance and management strategy.

13. Submission, approval and adherence to a Travel Plan.

14. A contribution towards off-site biodiversity enhancements within the local area to provide for a minimal overall 10% net gain in biodiversity

6.15.3 Officers can confirm that planning obligations 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.

- 7.2 The proposed development would result in the loss of a significant amount of undesignated open space, however in accordance with Policy EN8 the proposals are considered to have satisfactorily demonstrated that improvements to the remaining open space would be provided to a level sufficient to out-weigh the loss. The provision of public access to the remaining open space on what is currently private land is considered to be a significant benefit of the proposed development.
- 7.3 The proposals are considered to have demonstrated that they would provide for an appropriate, high-quality and landscape orientated site layout which, subject to the recommended conditions and section 106 obligations, is considered to fit within the context of the site in terms of visual amenity and landscape views from both local and longer range. The proposed layout is also considered to have demonstrated that it would not result in any significant detrimental impacts on the residential amenity of surrounding occupiers and that future occupiers of the development would be provided with a good standard of residential accommodation and environment. Whilst some instances of concern regarding overshadowing from retention of existing trees to gardens and pressure to prune remain, these incidences are significantly reduced from the previous application and are not considered so significant as to justify refusal of the application on this basis.
- 7.4 The development would provide for a significant net gain in on-site tree planting and marginal gain in biodiversity whilst providing on site recreational facilities and contributing to improvements to facilities elsewhere in Emmer Green.
- 7.5 The application is accompanied by detailed assessments in terms of transport and air quality impacts which subject to the recommended conditions and section 106 obligations, including off-site highway improvements, are considered to demonstrate that the proposals would be acceptable in respect of these matters. The proposed development also demonstrates strong compliance with the Council's planning policies in terms of sustainability, energy efficiency and adaptation to climate change.
- 7.6 The proposals would be fully policy compliant in terms of affordable housing provision and would make appropriate contributions towards health care provision within the surrounding area.
- 7.7 There will be other temporary impacts, as with the majority of development of this this scale, such as disturbance during the demolition and construction phases for example. However, it is considered that the application has demonstrated that these matters could be sufficiently mitigated, including by way of the recommended conditions and section 106 legal agreement obligations.
- 7.8 Therefore, when applying an overall critical planning balance of all material considerations presented, the application has been found to have overcome the previous reasons for refusal and is recommended for approval, subject to the

recommended conditions, completion of S106 and S278 Agreements as set out in this report.

**Case Officer: Matt Burns**

APPENDIX A - LIVA IMPACTS SUMMARY TABLE

Receptor/ Affected Group	Value or Sensitivity of Receptor	Activity or Impact	Embedded Design Mitigation	Magnitude/ Spatial Extent/ Duration/ Likelihood of Occurrence	Significance of Effect	Additional Mitigation	Residual Magnitude of Impact	Significance of Residual Effect
<b>Operation</b>								
Contextual landscape	High-Low	Completion of new woodland planting area	Compensatory Tree Planting Plan	Minor / Local / Permanent / Likely	<b>Minor beneficial</b> for woodland planting	Material palette characteristic of local area  Landscape maintenance guidelines	Minor / Local / Permanent / Likely	<b>Minor beneficial</b> for woodland planting
National level landscape character	Medium	Small change in landscape character at the national designation level (Chilterns)	Indicative Site Layout  Compensatory Tree Planting Plan	Negligible / National / Permanent / Likely	<b>Negligible</b>	Material palette characteristic of local area  Landscape maintenance guidelines	Negligible / National / Permanent / Likely	<b>Negligible</b>
County level landscape character	High-Medium	Small change in landscape character at the county designation level, but remains within urban area characterisation	Indicative Site Layout  Compensatory Tree Planting Plan	Minor / County / Permanent / Likely	<b>Negligible</b> from development  <b>Minor beneficial</b> when considering tree planting, otherwise negligible	Material palette characteristic of local area  Landscape maintenance guidelines	Minor / County / Permanent / Likely	<b>Negligible</b> from development  <b>Minor beneficial</b> when considering tree planting, otherwise negligible
Local level landscape character	Medium - Low	Change in landscape character setting	Indicative Site Layout  Compensatory Tree Planting Plan	Minor/ Local / Permanent / Likely	<b>Minor adverse</b> due to change in setting  <b>Minor beneficial</b> due to woodland planting	Material palette characteristic of local area  Landscape maintenance guidelines	Minor/ Site / Permanent / Likely	<b>Minor adverse</b> Due to change in setting  <b>Minor beneficial</b> due to woodland planting
Night-time character	Medium	Increase of lighting intensity across the Site	Best practice and British Standards	Major / Site / Permanent / Likely	<b>Major adverse</b>	Lighting strategy	Major / Site / Permanent / Likely	<b>Major adverse</b>
Site topography	Medium	Change in site topography	Indicative Site Layout	Negligible / Site / Permanent / Likely	<b>Negligible</b>	None	Negligible / Site / Permanent / Likely	<b>Negligible</b>
Site land cover	Medium	Change in Site land cover to built form and open space	Indicative Site Layout	Moderate / Site/ Permanent / Likely	<b>Moderate adverse</b> on loss of private amenity space to new homes  <b>Moderate beneficial</b> on public open space provision	Material palette characteristic of local area  Landscape maintenance guidelines	Moderate / Site/ Permanent / Likely	<b>Moderate adverse</b> on loss of private amenity space to new homes  <b>Moderate beneficial</b> on public open space provision

Tree and vegetation pattern and Site landscape features	High	Change to the current tree stock	Indicative Site Layout	Moderate – Neutral / Site / Permanent / Likely	<b>Moderate beneficial</b> on replacement of trees	Material palette characteristic of local area  Landscape maintenance guidelines	Moderate Neutral / Site / Permanent / Likely	<b>Moderate beneficial</b> on replacement of trees
Movement corridors and public rights of way	Low	Increase of public access and public footpaths within the Site	Indicative Site Layout	Moderate / Site / Permanent / Likely	<b>Moderate beneficial</b>	None	Moderate / Site / Permanent / Likely	<b>Moderate beneficial</b>
Building height and form	Low	Appropriateness of building height and form characteristic of local area	Indicative Site Layout	Moderate-major / Site / Permanent / Likely	<b>Moderate-major beneficial</b>	None	Moderate-major / Site / Permanent / Likely	<b>Moderate-major beneficial</b>
Site character	Medium	Wholesale change from recreational green space, to new built form and open space	Indicative Site Layout	Moderate / Site / Permanent / Likely	<b>Moderate adverse – Moderate beneficial</b>	Material palette characteristic of local area	Moderate / Site / Permanent / Likely	<b>Moderate adverse – Moderate beneficial</b>
Views from residential receptors	Medium-low	Change in character and amenity of view	Indicative Site Layout	Moderate-major / Local / Permanent / Likely	<b>Moderate-major adverse</b> on immediate receptors  <b>Moderate – minor adverse</b> on wider receptors	Material palette characteristic of local area  Landscape maintenance guidelines	Moderate-major / Local / Permanent / Likely	<b>Moderate – adverse</b> on immediate receptors  <b>Minor adverse</b> on wider receptors
Views from education and community facilities	Low	Change in character and amenity of the view from Emmer Green Primary School and Emmer Green Youth and Community Centre	Indicative Site Layout	Moderate / Local / Permanent / Likely	<b>Moderate adverse</b>	Material palette characteristic of local area  Landscape maintenance guidelines	Moderate / Local / Permanent / Likely	<b>Minor adverse</b>

Views from road corridors	Low	Change in character and amenity of the transient view close to the Site, primarily Kidmore End Road	Indicative Site Layout	Moderate / Local / Permanent / Likely	<b>Moderate adverse</b>  <b>Minor adverse</b> once planting matures.	Material palette characteristic of local area  Landscape maintenance guidelines	Moderate / Local / Permanent / Likely	<b>Moderate - minor adverse</b>
Views from Public Rights of Way	Low	Views from footpaths and cycleways near the Site	Indicative Site Layout	Negligible / Local / Permanent / Likely	<b>Negligible</b>	None	Negligible / Local / Permanent / Likely	<b>Negligible</b>
Views from open spaces	Medium	Increase in intensity of built form from Emmer Green Playing Field	Indicative Site Layout	Minor / Local / Permanent / Likely	<b>Minor Adverse</b>	None	Minor / Local / Permanent / Likely	<b>Minor Adverse</b>
Views from designated landscapes	High	Change in character and amenity of the view from AONB and Caversham Park and Gardens	Indicative Site Layout	No effect	<b>None</b>	None	No effect	<b>None</b>



# Fairfax

Fairfax (Reading) Ltd and Reading Golf Club Ltd  
Scale: 1:1000 Dm By: PJH Date: Oct '21  
Dwg No: 2127/PL\_04 Rev.L

Project: **Reading Golf Club**  
KIDMORE END ROAD,  
EMMER GREEN, READING

Drawing Title: **SITE LAYOUT**

Copyright: Paul J Hewett R.I.B.A. Chartered Architect



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PROPOSED SITE LAYOUT PLAN

RE202100-000000