

Caversham And District Residents Association

CADRA Comments on Local Plan partial update

Q1: Do you agree with the changes to the sustainability objectives to be used in carrying out sustainability appraisal?

Yes

Q2: How should the Climate Emergency be reflected in the vision and objectives?

We suggest a clear reference to the Sustainable Design and Construction policy (CC2) and the Climate Change Strategy (CC3), as updated.

Q3: Do you have any comments on the suggested changes to the vision, objectives, and spatial strategy?

CADRA notes the increased housing requirement and the complex relationships with neighbouring authorities. We support the need for family housing.

Q4: Do you agree with the proposed plan period of 2023 to 2041?

Yes

Q5: Do you agree with the list of strategic policies?

Yes

Q6: Do you agree that we should update the cross-cutting policies listed?

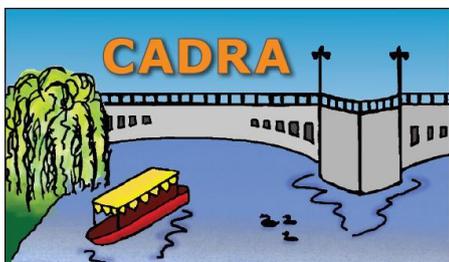
Yes

Q7: Do you agree that we should update policy CC2 as described? Are there other changes that are required?

CADRA welcomes the update and the requirements for new homes to meet the highest standards of sustainable design and construction, including a strong presumption against demolition.

Q8: Do you agree that we should update policy CC3 as described? Are there other changes that are required?

Yes, but we suggest an additional reference to the forthcoming updated Climate Strategy.



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Q10: Do you agree that we should update policy CC7 as described? Are there other changes that are required?

We note the changes in national policy.

Q11: Do you agree that we should update policy CC9 as described? Are there other changes that are required?

We note the changes in national policy.

Q12: Do you agree that we should update the built and natural environment policies listed?

No. The following policies should also be reviewed:

EN3: Enhancement of conservation areas requires significant updating.

EN5: PROTECTION OF SIGNIFICANT VIEWS WITH HERITAGE INTEREST – the policy should be revised to maintain a readily available link to the supporting evidence.

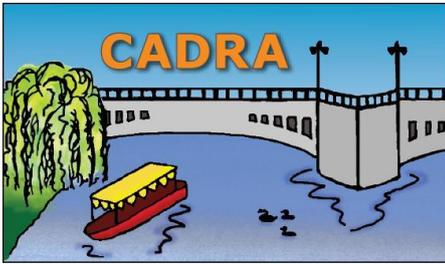
EN9: PROVISION OF OPEN SPACE

With the increasing amount of family accommodation in high rise town centre buildings, this should be strengthened to ensure adequate provision for children and young people.

EN11: WATERSPACES

Mention should also be included of the need to avoid overshadowing of the water space. The riverbanks are an important feature of the town to be enjoyed by all. The banks of the Thames should not be unduly dominated by residential and should provide leisure and other uses for wide enjoyment.

Q13: Do you agree that we should update policy EN4 as described? Are there other changes that are required?



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EN4: Locally important heritage assets.

CADRA notes the need to ensure this is consistent with NPPF para 201. The wording should also reflect advice from Historic England who advise that:

Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment. CAAC should have the opportunity to comment on the proposed wording.

Q20: Do you agree with the proposed additions to policy EN12 as a result of the Biodiversity Action Plan?

Yes. In addition, 6.25 should add a requirement not to create overshadowing of a watercourse which can create significant negative impacts on biodiversity. This is an issue on which the Environment Agency has previously commented in relation to the development on the SSE site.

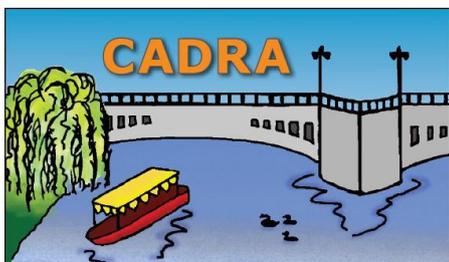
“The usual rule of thumb would be to have the building set back from the bank top the same distance as the height of the building to prevent shading of the river and river bank.”

Q21: Do you agree that, in the event of land in Reading being identified for inclusion within the Chilterns AONB, we should update policy EN13 as described? Are there other changes that are required?

CADRA supports the change.

Q22: Do you agree that we should update policy EN14 as described to take account of the Tree Strategy and other matters?

CADRA supports the changes.



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Q24: Are you aware of anything else that should be factored into an update to policy EM1?

AND

Q25: EM2: Location of new employment development

The policy considers core areas of employment. CADRA would like the policy to consider other areas where employment could help reduce the need to travel to core areas. This needs to be carefully balanced with the need to ensure residential areas remain pleasant and safe places to live.

Q26: Do you agree that we should update the housing policies listed?

No. **H10: Private and communal outdoor space** should be reviewed in the light of the increase in family housing in the town centre. Whilst not underestimating the challenges, CADRA is very concerned that Para c below restricts the requirement on developers. This is a critical issue for the future physical and mental health of children and young people living in the town centre.

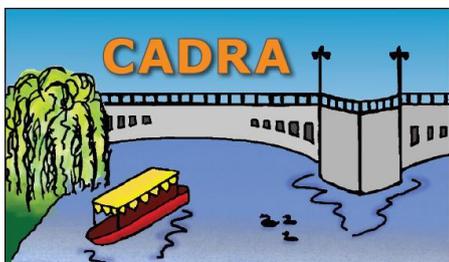
(c) Development in central Reading will not always be expected to comply with the standards set above. Open space is nonetheless required, unless exceptional circumstances prevail, to accommodate modest sitting out areas and clothes drying facilities.

Q27: Do you have any comments on the amount of housing that Reading should be planning for?

CADRA regrets the imposition of the 35% uplift for Reading, particularly as the issue is not adequately shared with neighbouring authorities. We support additional assessment of both the need and the capacity to provide appropriate living conditions. We hope this will consider a realistic assessment of town centre living conditions for families.

Q28: Do you have any comments on how the issue of a shortfall in identified needs is proposed to be addressed?

See Q27 above.



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Q29: Do you agree with the proposed update to policy H2 to incorporate minimum densities?

CADRA notes the following proposals for usual minimum densities:

- o Town centre – 200 dwellings per hectare;*
- o Highly accessible urban sites (district and local centres and sites close to a high frequency public transport stop) – 100 dwellings per hectare;*
- o Other urban sites – 70 dwellings per hectare*
- o Suburban sites – 40 dwellings per hectare.*

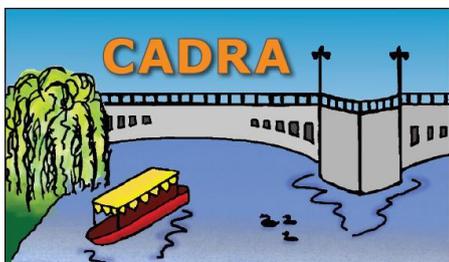
We have significant concerns over the application and interpretation without further clarification.

- How will the areas be defined?
- How will high frequency bus stop be defined? We urge that it should not include stops served by an hourly bus service with limited evening and weekend service.
- Several district and local centres are traditional village centres with heritage importance.

We strongly support the proposal that *“a set of criteria for considering exceptions be included, to include matters such as the presence of heritage assets or sensitive landscapes or townscapes, unacceptable impacts on residential amenity and any impacts on delivering the necessary mix of sizes of dwelling.”*

Q30: Do you agree with the proposed increased focus on family housing in policy H2?

- *That the minimum proportion of 3- or more bed homes required on sites of ten or more dwellings outside centres be increased from 50% to 67% (one third) unless this is not achievable;*
- *That, notwithstanding the minimum proportion, the number of 3- or more bed homes on sites of all sizes should be maximised;*
- *That a minimum percentage of three-bed dwellings within district and local centres of 20% be applied;*



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- *That there also be increases in family housing provision in Central Reading (see discussion on policy CR6); and Reading Borough Local Plan Partial Update – Consultation on Scope and Content, November 2023 42*
- *That the policy explicitly state that, in the event of conflict between meeting minimum densities and delivery of family housing, family housing will take priority*

Yes, we support the proposal for much needed family housing. This is needed to increase supply and to counterbalance the developer preferences for one and two bed homes. But it must consider living conditions for families.

Q31: Do you agree with the proposed update to policy H2 to strengthen the wording on self-build?

Yes

Q32: Do you agree with the proposals for incorporating First Homes into policy H3 as described.

CADRA supports the need for affordable housing but does not have the knowledge or expertise to comment on the detailed proposals.

Q35: Do you agree with the proposed update to policy H4 around rolling tenancies forward?

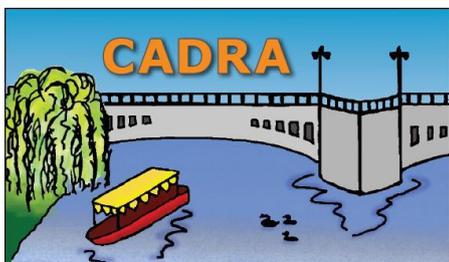
Yes

Q36: Do you agree that we should update policy H5 as described? Are there other changes that are required?

Yes

Q37: Do you agree that we should update policy H6 as described?

A greater range of specialist residential accommodation for older people is needed to provide attractive options for those wishing to downsize. This should include units within mixed areas, not just within a complex for older people. There are many benefits from mixed housing.



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Q38: Do you agree that we should update policy H7 as described to allow for increases in family housing?

Yes

Q39: Do you agree that we should update policy H8 as described to address issues with implementation of the policy?

The policy for HMOs and Article 4 should not preclude the addition of other areas which become affected by a growing proportion of HMOs.

Q47: Do you agree with the proposed updates to policy TR5 regarding electric vehicle charging?

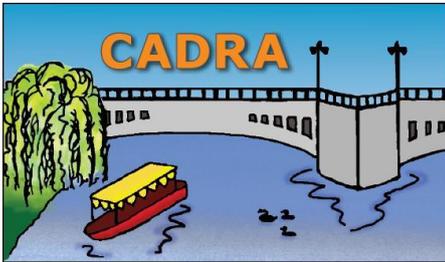
Yes. Being able to charge an EV from one's own domestic supply makes the fuel cost of EV much cheaper than a petrol or diesel vehicle. 45% of Reading residents have no off-street and will incur charging rates that are significantly more than off-peak domestic rates. Whilst The Council's Electric Vehicle Charging Infrastructure Strategy 2023 describes trialling various ways for residents to connect to their own supply, this may not be possible for a significant number of residents. The policy should favour and encourage charging station applications for multiple chargers where the operators can offer near domestic rates for residents without off street parking.

Q48: Do you agree that we should update the retail, leisure and culture policies listed?

Yes

Q49: Are you aware of anything else that should be factored into an update to policy RL2?

It is notable that a common and significant response from North Reading residents to the proposals North of the station, was the loss of retail – particularly Aldi and The Range. The population of North Reading represents about a fifth of the Borough. The previous and prospective loss of convenient, good value retail is a growing concern. Increasingly, such retail is at an increasing distance and extremely difficult to access by public transport. This increases cross town car journeys which is damaging to the environment. This should be considered in determining the location of retail areas.



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The policy considers core areas of employment. CADRA would like the policy to consider other areas where employment could help reduce the need to travel to core areas. This needs to be carefully balanced with the need to ensure residential areas remain pleasant and safe places to live.

The riverbanks are an important feature of the town to be enjoyed by all. The banks of the Thames should not be unduly dominated by residential and should provide leisure and other uses for wide enjoyment which might include retail.

Leisure facilities need to be spread across the town to allow good access without recourse to private car journeys.

Q50: Do you agree that we should update policy RL3 as described to reflect permitted development rights?

Yes

Q51: Do you agree that we should update policy RL4 as proposed to address other gambling establishments?

Yes

Q52: Do you agree that we should update the policies for other uses listed?

No.

OU4: Advertisements should be updated to consider the growing number of applications for digital advertising.

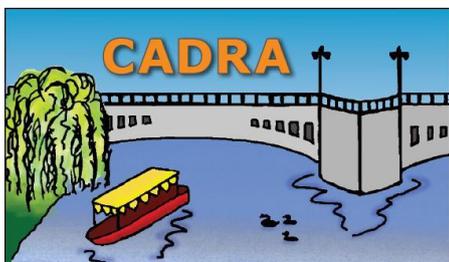
OU5: Shopfronts and cash machines. The important Design Guide to shopfronts must be safeguarded.

Q54: Do you agree with the changes proposed to policy OU3?

Yes

Q56: Do you agree that we should update policy CR2 as described? Are there other changes that are required?

We suggest that reference should be made to the exceptional historical details which remain on the upper storeys through much of the town centre.



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Q58: Do you agree that we should update policy CR6 to seek a greater contribution towards family housing?

Yes, but this raises many questions about facilities and the quality of life for families.

Q61: Do you have any views on the amendments to CR11d that have been suggested to us?

Apex is already a tall building within a very constrained site, between a busy road and the railway. This poses issues for living conditions. Traffic access would be very difficult. Thames Quarter is already impacted by taxis, delivery vans and other vehicles stopping in front of the building, restricting pedestrians. An equivalent problem for Apex would be even more severe.

Q65: Do you agree with the proposed changes to CR13a to increase the emphasis on culture and heritage?

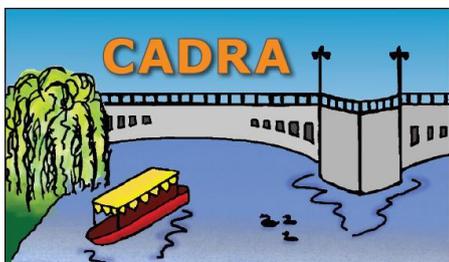
Yes

Q66: Do you have any views on the amendment to CR13c on Kenavon Drive and Forbury Business Park that has been suggested to us?

This area forms an important part of the setting to the Abbey Quarter and the Listed Reading Prison. An increase of that scale has the potential to seriously impact those settings.

Q68: Do you have any comments on any of the potential additional allocations to policy CR14?

Where possible all such redevelopments, which are close to the river, need to include a good mix of residential and leisure with wide appeal. There should be easy access and routes to the river. Between the bridges the south bank is developed up to the towpath. Developments need to increase the green space along the bank, by the landscaping of the access routes.



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Specifically:

Crowne Plaza Reading, Richfield Avenue (Cen4): potential full or partial redevelopment of hotel site for hotel with ancillary food and drink, residential use, residential care and/or filling and EV charging station.

The Crowne Plaza site has considerable historical significance. The current hotel follows the White Hart Hotel and two versions of the Caversham Bridge Hotel. It serves as an important gateway to Caversham and the St Peters Conservation Area. It forms part of the view from the Conservation Area and is highly significant location on the River Thames. The adjacent Council car park is well used, providing access to many riverside activities.

It is important that the hotel provides sufficient car parking to support its residents and activities, without putting pressure on the Council car park or neighbouring streets.

2 Norman Place (Cen5): potential redevelopment of office for a residential development of around 240 dwellings

The general principles above should apply.

Reading Bridge House, George Street (Cen6): potential redevelopment of office building for 300 to 400 dwellings.

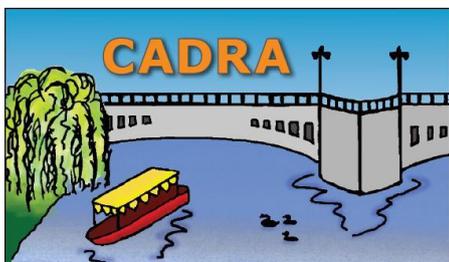
Reading Bridge House sits directly on to the Locally Listed Reading Bridge which celebrated its centenary in October 2023. <https://www.readingmuseum.org.uk/reading-bridge-1923-2023-2>. This is a highly sensitive site and CADRA has significant concerns over potential demolition and redevelopment. The existing building is of its era and has many merits.

Traffic access would be very difficult. Thames Quarter is already impacted by taxis, delivery vans and other vehicles stopping in front of the building, restricting pedestrians.

The general principles above should apply.

Tesco Extra, Napier Road (Cen7): potential development of part of the existing car park for 150-200 dwellings.

This is a sensitive site with important natural landscape and links to the important pedestrian route along the riverbank. from multi-story buildings. Some kind of low-rise leisure use would be preferred.



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Q69: Do you have any comments on the proposed changes to policy CR15 regarding the Abbey Quarter?

CADRA supports the proposed change.

Q77: Do you agree with the proposed changes to the existing allocated sites in Caversham and Emmer Green

We agree with the updating to reflect planning approvals and developments in progress. Changes in capacity would need to be considered against criteria for considering exceptions, to include matters such as the presence of heritage assets or sensitive landscapes or townscapes, unacceptable impacts on residential amenity and any impacts on delivering the necessary mix of sizes of dwelling.

Q81: Do you agree that we should update policy ER3 regarding Royal Berkshire Hospital as described?

Yes

23 Jan. 24