

**Caversham
And
District
Residents**

Planning Department

South Oxfordshire District Council

9th January 2017

Dear Sir,

**Planning Application No. P16/S3630/O Residential development
and Kiln Road, Eye and Dunsden/Emmer Green**

We refer to the Planning Application for a residential development of up to 245 dwellings (including up to 40% affordable housing), structural planning and landscaping, informal public open space and children's play areas, vehicular access from Peppard Road and Kiln Road and associated ancillary works. All matters reserved with the exception of the main vehicular access.

CADRA wishes to raise serious concerns about this application and believes that it should be rejected. Our reasons are detailed here.

1. Planning Policy and Strategy

1.1 SODC Local Plan

In 2014 SODC consulted on the option of locating housing adjacent to the edge of Reading.

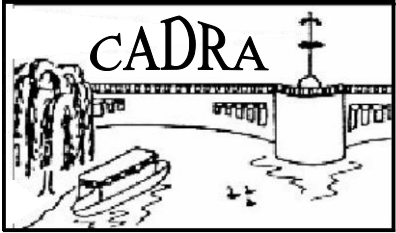
http://www.southoxon.gov.uk/sites/default/files/2014-06-05_SODC%20LP2031%20ISSUES%20&%20OPTIONS%20DOCUMENT%20final.pdf

Option F: Next to neighbouring major urban areas

Our rural district lies immediately adjacent to the major town of Reading and the city of Oxford. Here there are many employment opportunities as well as universities, regional hospitals and bigger shopping centres. One option would be to put our housing growth on the edge of these neighbouring urban areas.

This option had already been specifically rejected in the South Oxfordshire Proposed Submission Core Strategy December 2010:

7.22. As part of our distribution strategy we have considered land outside Reading. Some of this lies within the floodplain and other areas within the Chilterns AONB. Further development focused on Reading would increase the pressures on the constrained bridges crossing the Thames and the strategy does not therefore provide for urban extensions to Reading.



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1.2 Planning Inspectorate review of SODC Core Strategy

In October 2012, the Planning Inspector examining the SODC Core Strategy reported:

[http://www.southoxon.gov.uk/sites/default/files/Report%20 final .pdf](http://www.southoxon.gov.uk/sites/default/files/Report%20final_.pdf)

106. Turning to the CS coverage of Thames crossings, there has been 'considerable pressure' for a new bridge near Reading, but OCC and SODC do not consider that a convincing case has been made for a bridge as an appropriate solution to cross-river issues in that area. However, policy CSM1(iv) commits them to continue current working arrangements with other local authorities affected by cross-Thames travel near Reading. The CS is therefore sound on this point.

1.3 Refined Options

The Refined options document February 2015, confirmed Option F as not appropriate.

http://www.southoxon.gov.uk/sites/default/files/2015-02-02_SODC%20LP2031%20REFINED%20OPTIONS%20DOCUMENT%20Final%20web%20ready_1.pdf

Option F: Next to neighbouring major urban areas. As with 'Option D', this is not likely to be the most appropriate way deliver the new homes required for South Oxfordshire. However, it could help accommodate unmet need from Oxford.

1.4 Summary of current planning policy

All current SODC planning policy relating to land adjacent to the Reading boundary has been limited to small, exceptional development, except for specific provision for development in existing larger and smaller villages.

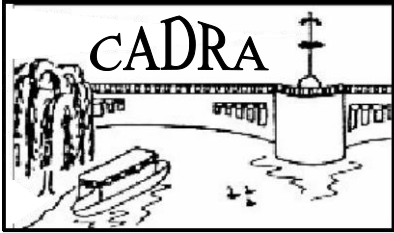
This application for 245 new homes, adjacent to the Reading boundary and separate from existing SODC settlements is therefore clearly contrary to both adopted and emerging SODC planning policy.

2. Transport Links

2.1. Thames Crossing

No work appears to have been undertaken to show the possible additional trips across the Thames to and from the development. The cumulative impacts of developments in SODC have contributed to a significant worsening of traffic conditions in Emmer Green, Caversham and Reading.

Recently Wokingham District Council, together with: Reading Borough Council, Oxfordshire County Council and South Oxfordshire District Council, has started a traffic modeling exercise to examine a possible 'Third' Reading Bridge over the Thames. We understand that this bridge could remove some of the South Oxfordshire 'through' traffic from Reading, Caversham, Sonning and (possibly) Henley Bridges.



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Until the traffic modeling has been completed and the location of the Third Reading Bridge and connecting roads has been determined, we believe that no further residential development should be permitted within the South Oxfordshire study area.

The Traffic Management Act 2004 Part 2 Section 16 - Network Management Duty: requires traffic authorities to consider:

"the expeditious movement of traffic on road networks for which another authority is the traffic authority."

We believe that contributions by developers should be made available to the adjacent traffic authority where the development would have a detrimental impact.

This might be for upgrading highways and junctions, to accommodate generated traffic, or for the provision of additional public transport services. The aim should be for the road network and public transport services to be returned to the levels of capacity that were available before the development was constructed

The adjacent traffic authority should be consulted, at an early stage, to enable the traffic impact on that authority's area to be assessed and the level of contribution towards mitigating measures to be agreed before planning permission is granted.

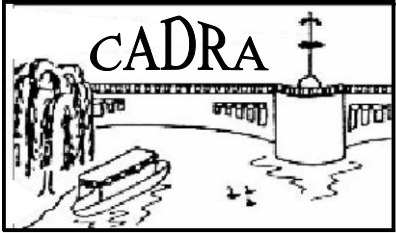
Therefore, we object to the proposed residential development on the grounds that the cumulative effects of South Oxfordshire developments have contributed to a worsening of traffic congestion, pollution and quality of life in Caversham.

2.2 Local Traffic

The 2011 Census data shows that the likely workplace destinations of residents of the new development are likely to be (approximately): 42% to Reading, 11% through Reading and 25% towards Sonning Bridge via Caversham Park Village. Therefore 53% of the newly generated traffic would travel through Caversham which is already heavily congested. In these circumstances, it is reasonable to assert that one additional vehicle equates to one additional vehicle on the queue length.

The peak hour Trip Generation figures appear to be over optimistic especially as the new development is proposed at the boundary of a major town and in an area with poor and infrequent public transport provision. It would have been helpful if new data had been collected from similar, nearby, developments with similar resident demographics. Reliance upon generic TRICS data seems naive.

The individual junction analyses show that some junctions are at, or above, their capacities in peak periods and that traffic generated by the new development would increase existing queues and delays. The developers do not propose any mitigating measures to accommodate additional congestion. In effect the developer is proposing to reduce the design life of the junctions provided by the Highway Authority (Reading Borough Council) without compensation.



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Existing bus services are full in peak periods and passengers from the new development will deny space to people who live closer to Caversham and the centre of Reading. No contribution has even been considered to provide improved local bus services.

To recap, this proposal is based upon generic trip data and not on reliable, locally sourced trip rates and is, therefore, flawed and does not inspire confidence.

3 Education

All references in the planning documents are to primary schools in Caversham and Emmer Green – not to SODC schools. All primary schools in Caversham and Emmer Green are at or above capacity. It can be expected that 245 homes with 40% affordable will house a considerable number of families with young children.

We strongly object to this proposal without any provision to increase the capacity of school places. At the exhibition held, Gladman advised they would be holding discussions with Reading Borough Council Education but there is no reference to this in the planning documentation.

4 Primary Health

Again, reference is to the GP Surgeries in Caversham and Emmer Green – not to SODC services. Primary health services in North Reading are at capacity. 245 new homes will represent a considerable increase in demand for services.

We strongly object to this proposal without any increase in capacity of local primary health care services.

5 Conclusion

This application to SODC has substantial implications for infrastructure, transport and services in Reading Borough and especially for the residents of Emmer Green and Caversham, and no contribution for their provision has been considered.

We therefore consider that the proposed development is unsustainable and, thus, contrary to the National Planning Framework.

It is clearly also contrary to both the approved and emerging SODC planning strategy. For these reasons CADRA believes that it should be rejected.

Yours faithfully,

Helen Lambert

CADRA Chair

Caversham And District Residents Association