

Caversham and District Residents' Association (CADRA)

Comments on the Draft Reading Local Plan

May 2017

http://www.reading.gov.uk/media/7154/DraftReadingBoroughLocalPlan0517/pdf/Draft_Reading_Borough_Local_Plan_0517.pdf

4.2 Built and Natural Environment p 33

CADRA is very pleased the Local Plan contains an expanded section on the built environment, which contains important policies to protect heritage assets in the town.

We have very much welcomed the collaboration between Reading Borough Council, English Heritage and Community Groups, via the creation of the Conservation Areas Action Committee (CAAC) to address how the heritage of Reading can be protected.

We have some comments on specific elements of the proposals:

EN1 p36 Protection and enhancement of the Built Environment p36

It would be helpful to add a sentence to the effect that new development *should be appropriate in terms of scale, materials and location* in heritage areas.

And to add this sentence from the National Planning Policy Framework (Section 12, para 130)

Where there is evidence of deliberate neglect or of damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Para 4.2.14 Article 4 directions p36

We would welcome a more positive statement which recognises the role which Article 4 directions can play in preventing the deterioration of heritage areas, and a clear intention by RBC to use them when appropriate.

Para 4.2.15 Conservation Area Appraisals p37

We would prefer to see this linked to Para 4.2.19, which deals with the role of the Conservation Areas Action Committee (CAAC).

Para 4.2.19 Should be expanded to explain that, subject to Public Consultation, the community-led conservation area appraisals are intended to be adopted as formal policy documents by RBC.

Para 4.2.16 **Heritage Assets at Risk** p37

CADRA would welcome a stronger policy statement which demonstrates the Councils commitment to addressing the issues which will protect vulnerable heritage assets.

CADRA remains very concerned about the state of Chazey Farm barn in The Warren, a Grade 1 listed building. English Heritage currently assesses its condition as '*Very bad*' and gives the building Priority Category, because it is '*at immediate risk of rapid deterioration or loss of fabric with no agreed solution*'. CADRA would look for an intention from RBC to actively work towards protecting this valuable building.

<https://www.historicengland.org.uk/advice/heritage-at-risk/search-register/results?q=Reading+&searchtype=har>

Para 4.2.20 **List of Locally Important Buildings** p38

We would welcome a scheme similar to that operated by Basingstoke and Deane Council, whereby parish councils and local heritage groups can nominate buildings to be listed as locally important. The Conservation Area Action Committee could play a valuable role in nominating appropriate buildings.

<http://www.basingstoke.gov.uk/HE02>

Whilst they will not have statutory protection, there should be a clear policy intention that the qualities of buildings on the List will be fully taken into account when assessing any proposals for change or redevelopment which could affect them.

We would urge that the Council should require an applicant to justify why the existing building could not be retained or altered as part of development proposals, or demonstrate that the development would make a more positive contribution to the character and appearance of the area.

Policy EN5 **Heritage Views** p39

We are very pleased that policies to protect significant views with heritage interest have been included in the Local Plan. We have welcomed the collaborative working between the planning officers and member of the CAAC and CADRA in formulating these policies.

Para 4.2.24 **Pre-application Discussion** p40

We welcome the acknowledgement that pre-application discussions have a vital role to play in promoting and protecting historical character. We would welcome a statement which supports and advocates the involvement of interested community groups at a pre-application stage for all sites that are of community interest.

Housing in Caversham p183

The Local Plan recognises that there is little scope for additional housing in Caversham, and therefore the proposal for 700 additional homes by 2036 is a cause for significant concern.

We are concerned that there are no phasing proposals which would ensure that the provision of additional housing could be spread over the local plan period.

The sites identified in the Local Plan as suitable for residential development could offer between 164 and 241 of these. Sites with existing permissions might provide a further 121 for elderly people, and an estimate of 40-45 homes at Caversham Park once the site vacated by the BBC is also mentioned.

This would leave a target of between 290 and 375 dwellings to be located on infill sites or in residential gardens.

As there are few infill sites these figures will inevitably act as an invitation for developers to target residential gardens. As individual schemes in residential gardens produce modest number of homes, the number developments which would be required to meet the target figures would be very considerable. Whilst sometimes successful, developments in residential gardens can gradually erode the character of areas. They also involve the loss of valuable green spaces and disrupt wildlife corridors. Cumulatively they can have the effect of changing the character of an area and we would expect policies which ensured that this does not occur.

H10 Development of Private Residential Gardens p82

The policy and supporting statements on development in residential gardens must be strong enough to resist applications which will claim to be providing 'sustainable' development. It will of overriding importance to ensure that the character of an area and the way it functions will not be compromised – para 4.4.74 – and we would like to see this included in the policy.

A policy should be required which ensures that a number of residential garden developments cannot be located close together.

EN14 Trees, Hedges and Woodlands p52

Many of the fine mature trees in which contribute to the character of Caversham were planted in Edwardian times and some will be nearing the end of their natural life in the coming decades. To preserve the leafy character of the area which is so much valued by residents it will be important to plan for succession planting. We would welcome a statement in the Local Plan which advocates and supports the importance of planning for succession planting.

OU5 Shopfronts and Cash Machines p109

We support the policy for shopfronts and would welcome a statement that where the policy is not complied with enforcement action will be taken. Individual examples of poor shopfronts can start a process where the character of the surrounding area slowly starts to change and deteriorate.

For this reason, supplementary guidance on the type of shopfronts that would be appropriate would be helpful, particularly for premises in Conservation Areas and district centres. We are particularly concerned that shopfronts in older and historic buildings should be enhanced by use of materials which are sympathetic with the character of the building, and that the design, fonts, colours and lighting, if used, should preserve and enhance existing character of the building.

OU4 Advertisements p107

We feel that policy OU4 should be strengthened by incorporating the intention to manage the type of advertisements that would be allowed - this is dealt with in para 4.7.25.

We have a particular concern about the advertisements on older buildings, and those within Conservation Areas and District Centres. Supplementary guidance on the type of advertisements which would be appropriate would be helpful. Materials should be sympathetic with the character of the building. Design, fonts, colours and lighting, if used, should preserve and enhance existing character of the building. Brightly – lit LED signs and the use of vivid or luminous colours should be avoided.

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