

**Caversham And District
Residents Association**

CADRA Comments on Planning Application 210018

Reading Golf Club - March 2021

Relationship to Reading Local Plan

This application is contrary to the Reading Local Plan in many respects. The plan explains the limitations on development in Caversham and Emmer Green as follows:

*8.2.4 As a result of the limited development capacity, the overall strategy in this area is largely based around ensuring that, where development is to be accommodated, it is done in a way that prevents adverse effects on the existing areas. Of particular importance in Caversham and Emmer Green are potential effects on landscape, heritage and **infrastructure**. The relationship of the **landscape** with the Chiltern Hills and River Thames, described in paragraph 8.1.6, and of the townscape with the former separate settlements of Caversham and surrounding hamlets, will be preserved.*

*8.2.5 The adequacy of infrastructure to support additional development remains one of the most significant concerns in the area. In particular, **transport, education and healthcare** are issues that would need to be addressed in any development.*

This planning application does not take account of these limitations and will adversely affect the landscape, infrastructure, transport and education in the existing areas. The offer to build a healthcare centre is only part of improving healthcare in the area.

More specific issues where the application is contrary to the plan include the following:

CA1b

After lengthy discussion and several consultations, the Reading Local Plan provides for 90 -130 homes on:

CA1b PART OF READING GOLF COURSE, KIDMORE END ROAD 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.

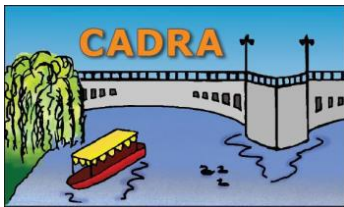
This application is for 260 homes, without provision of sports facilities in Reading.

Transport

The plan indicates at 4.5.1,

the aim to reduce carbon emissions from transport, improve air quality and create a transport network which supports a mobile, affordable low-carbon future.

4.5.4 All developments will be assessed for their impact upon the transport network, including the local and trunk road and motorway networks Development should provide mitigation measures in line with their impacts on these networks, taking account of levels of development that have already been accepted, ...



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TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS ii) The development would not have a material detrimental impact on the functioning of the transport network; iii) The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists

In Appendix 1 attached, we demonstrate that the cumulative effects of piecemeal developments north of the Thames within Reading and South Oxfordshire have placed unacceptable transport pressures on, Emmer Green, Caversham, and Reading. And that the developer has **failed to demonstrate** that the development of Reading Golf Club would not have a material detrimental effect on transport within Emmer Green, Caversham and Reading. **The implications for air quality, congestion, severance and economic viability within both Caversham centre and Reading are profound and troubling.**

Kidmore End Road, the single-entry point to the development, does not permit two-way traffic near the junction with Peppard Road and the pavement here is very narrow. This makes it unsuitable as the main access road to the development and already places major pressures on the junction. It will present major issues for construction traffic. We note that Thames Water has advised that the existing infrastructure will be unable to accommodate the needs of the development and there will therefore be significant works for new infrastructure.

The applicant's report – Chapter 8, Traffic and Transport lists in Table 8.12 the new developments in Reading but makes no reference to agreed developments in South Oxfordshire. Traffic on Peppard Road is heavily influenced by **journeys from South Oxfordshire**. The recently agreed South Oxfordshire Local Plan shows in 4.30, table 4f, shows:

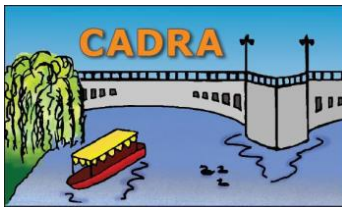
	Core strategy +15%	Completions and Commitments
Sonning Common	377	281
Watlington	262	363

These new homes, with other increases in South Oxfordshire, must be factored into traffic predictions.

The problem of congestion through Caversham Centre is already widely accepted and quoted by Councillors, Officers and by Reading Buses. The delays from congestion impede a reliable public transport service offering a viable alternative to private car journeys and cause economic disadvantage for the town. Additional pressures from this development would compromise a safe and efficient transport network. **This is contrary to several of the objectives set out in 4.5.1:**

- *To ensure that the transport network operates safely and efficiently to meet the needs of all users.*
- *To improve journey times, journey time reliability and the availability of information*
- *To reduce carbon emissions from transport, improve air quality and create a transport network which supports a mobile, affordable low-carbon future.*

The constrained roads through Caversham Centre do not lend themselves to mitigation measures and the cumulative impact of traffic pressures is clearly contrary to the stated objectives.



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Air quality

It is well established that air quality is poor in Caversham Centre. The section of Peppard Road approaching the junction with Prospect Street, with its enclosed topography, shows particularly high readings. Minor changes elsewhere result in traffic queues up Peppard Road to Emmer Green and beyond. Additional traffic from the development will increase pressures on the junction with Prospect Street. The applicant's results demonstrate that, *the junction currently operates above the theoretical operating capacity of 90% ... with ... relatively large queues.*

EN15: AIR QUALITY Development should have regard to the need to improve air quality and reduce the effects of poor air quality.

i. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated

Internal road network

In line with policies RTS2, 4.3 and 13 of the Draft Transport Strategy, we urge that the internal roads be designed to minimise domination by cars, by using shared and varied surfaces, traffic calming and width variations, following current best practice in that regard.

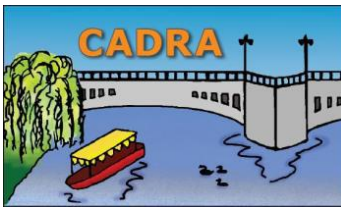
The layout proposed fails to embrace current thinking or to enhance green corridors. Please refer to the detailed analysis in **Appendix II attached.**

Landscape

The area proposed for development has significant scenic value, both for those using the land and when viewed by those close by. It is not a brownfield site. It is part of a large area of well-tended fine parkland that extends into South Oxfordshire, which has rural views towards and from the Chilterns AONB, less than half a mile away, to which it is linked by a series of footpaths and country lanes with established hedgerows.

The Reading part of the golf course provides a green peninsula pushing into urban Reading, which forms a pleasant and irregular border. As such it is a valued landscape for Reading. Bugs Bottom park further west provides a similar green feature, which is a significant asset for the town. Reading Local Plan, 8.2.4 and CAib recognise the need to preserve the valued landscape.

The landscape buffers shown are inadequate. Some form part of private gardens and are therefore unlikely to survive. The screening effects of planting have been exaggerated. The flats over the Health Centre, 12.5 high to the ridge, will be visually dominant on the landscape and out of character.



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Regardless of whether golf continues, the land does not stop having significant landscape value, for both Reading and South Oxfordshire residents, and visitors to the area. As such, **decisions on what should be allowed to happen to it should be considered for the whole of the golf course and not separately.** This accords with the comments of the RBC Landscape Services Manager, “We remain of the view that any development should be approved on a whole-site basis, so that neighbours within the jurisdiction of both authorities are not prejudiced by subsequent development.”

EN8: UNDESIGNATED OPEN SPACE

There will be a presumption in favour of retention of undesignated open space, which will include allotments. Development should not result in the loss of or jeopardise use and enjoyment of undesignated open space. 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. The quality of existing open space should not be eroded by insensitive development on adjoining land.

In an email dated 10 September 2020, Tom Wyatt, Team Leader Development Management (East), South Oxfordshire District Council wrote:

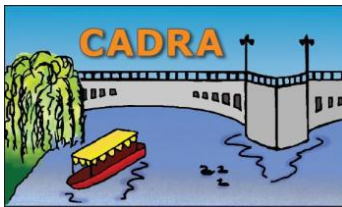
The land is contiguous with the application site and is not readily separable in terms of its landscape character. The application site is approximately 1km from the edge of the Chilterns AONB and the closest part of the existing golf course to the AONB is less than 500m away. As such there should be sufficient regard to the setting of the AONB, and the views out from the site towards the AONB, along with the experience of the users of both existing and proposed public rights of way between the edge of the urban area and the AONB.

Biodiversity and Climate Change

The application proposes removal of 122 mostly mature and protected trees and replacement with new planting. This forms a significant loss of biodiversity, habitat and an increase in CO2 levels. Planting replacements falls far short of the requirements in Reading’s revised Tree Strategy and would not be adequate compensation for the loss of mature trees, especially given the failure rate of new trees locally due to recent hot dry summers. Proposed planting within private gardens and retained trees in private gardens would be at risk.

The proposed planting of 1000 new trees is outside of the Borough and there is no assurance it can be delivered or relied on as mitigation or off-site compensation.

EN14: TREES, HEDGES AND WOODLANDS



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Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced. New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.

C3: ADAPTATION TO CLIMATE CHANGE

Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions¹²:

BIODIVERSITY AND THE GREEN NETWORK

- Areas with potential for biodiversity value and which stitch the Green Network togetherexisting and potential Green Links.. b) 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.*

Provision of off-site compensation should be provided prior to development.

Density and Mix

H2: Residential proposals for ten houses or more (excluding houses that are to be provided as affordable homes) will consider making appropriate provision for plots as self- or custom- build wherever viable and achievable ...

The application appears to make no provision for self or custom build.

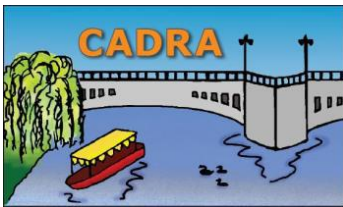
CADRA considers that this application is contrary to the provisions of the recently adopted Reading Local Plan and urges rejection.

Cross Boundary Issues

This application raises many significant issues which span Reading Borough and South Oxfordshire District. Reading Golf Club and Fairfax are seeking to make plans for the entire course. Throughout the engagement with the community, presentations have always included both sections. **This clearly presents a complex problem for the planning authority, but it is too important to ignore.**

The proposal presented includes:

- Enhanced golf facilities at Caversham Heath
- A new country park



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- Short Golf
- Allotments
- Community Orchard
- New walking and cycle links

These are clearly presented as outweighing the negative impact of a much larger development on the Reading land than was envisaged in the Local Plan. They have been heavily featured in the community engagement. A legal agreement has been offered and a management arrangement funded by a service charge has been suggested. **There are many unresolved issues which may prevent these proposals being implemented and be controlled in perpetuity.**

- A service charge would be costly and particularly **likely to be unaffordable for the 30% of affordable homes**
- There is no vehicle access to the greenkeepers complex or to proposed leisure areas
- The proposed allotments do not accord with the SODC policy on allotments
- The impact of narrow roads, particularly Kidmore End Road and Tanners Lane has not been considered. These are narrow rural lanes and not suitable for any significant increase in traffic. This issue was reference by SODC who urged the Reading BpCouncil to seek the views of Oxfordshire CC.

If these offers influence the decision in favour of approval, it is essential that a binding agreement is secured across the whole course regarding the proposed facilities.

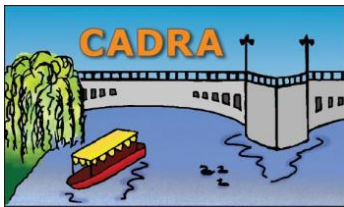
In conclusion

The proposal for a smaller development, as set out in the Local Plan was agreed after extensive and detailed consideration. CADRA urges refusal of this larger proposal which was considered for inclusion in the Local Plan and rejected.

10 March 2021

Appendix I- CADRA Detailed Transport Report

Appendix II – CADRA Comments on site layout



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Appendix I- CADRA Detailed Transport Report

Planning Application No. 210018 - Reading Golf Club, 7 Kidmore End Road, Emmer Green, Reading

Introduction

Fairfax (Reading) Limited and Reading Golf Club Limited (C/O Agent Pegasus Group Station Road Bracknell RG12 1LP) have made and outline planning application to Reading Borough Council (RBC), 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 document contains the comments of Caversham And District Residents Association on transport aspects of the proposed development.

Background

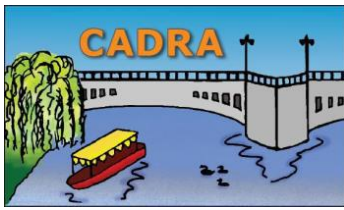
When considering the traffic impacts of their proposals, developers are frequently required to provide funding for highway improvements where development traffic would increase baseline flows by 5% or more. Calculation of opening year traffic flows includes growth in existing traffic, traffic generation from approved developments and from planning approvals. A highway authority might not require improvements if future demand flow does not exceed 85% of a junction's capacity.

Reading Borough Council and South Oxfordshire District Council have harmonised their opposition to further extensions to Reading north of the Thames and into open countryside. The main reason for this is the realisation that the lack of co-ordinated transport planning has resulted in a saturated and congested highway network on the approaches to and within Reading.

Caversham and Emmer Green have grown organically with piecemeal developments and without properly planned transport and other infrastructure. The driver for these changes was the economic success and employment opportunities in Reading, the fast rail links to London, Southampton, Wales, the West Country and the Midlands and the M4 Motorway.

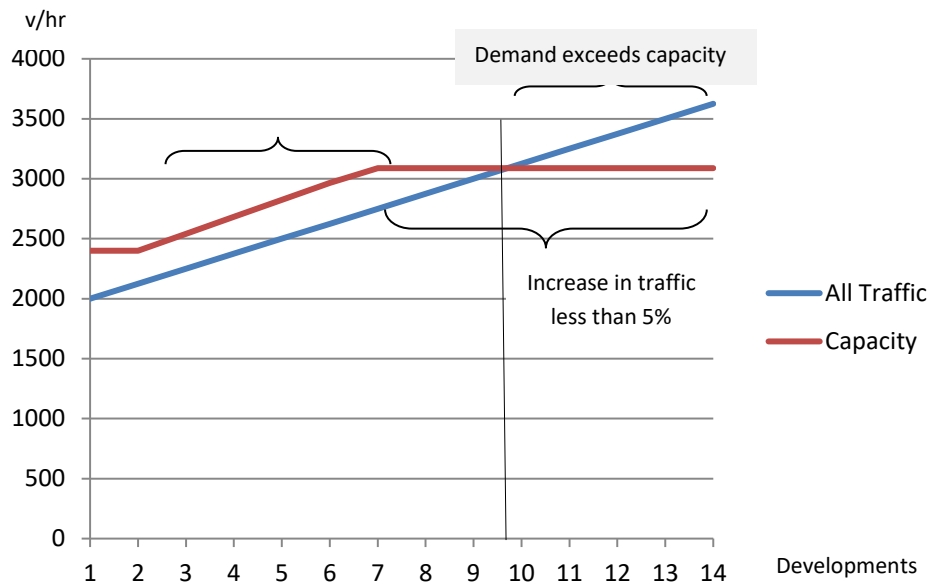
Cumulative impacts

The cumulative impacts of developments in SODC and Reading have contributed to a significant worsening of traffic conditions in Emmer Green, Caversham and Reading. The effects of recently approved developments and those under construction in South Oxfordshire have yet to be experienced but, as Reading centre and station is the primary attractor in the area, there is no doubt that they will exacerbate existing traffic problems.



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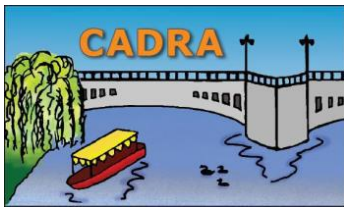
The simplified graph, below, demonstrates how cumulative effects of successive developments produce steadily worsening traffic conditions. In this example the first seven equal sized developments produced greater than a 5% increase in traffic flow and capacity enhancements were secured by the highway authority. The eighth and subsequent equal sized developments produced less than a 5% increase in traffic flow and the highway authority may be unable to secure further capacity enhancements. When the tenth development opened, traffic demand exceeded capacity and queue lengths continued to increase with each successive development. The highway authority was then powerless to control its own network.



Of course, some traffic queuing occurs before capacity is reached but, typically at traffic signals, queues are dispersed at or before the end of each 'green' stage. When demand exceeds capacity queues extend and queues cannot be fully dispersed during 'green' stages. Most drivers are quick to see when their journeys are becoming extended by congestion and tend to leave earlier or later than before. This produces a phenomenon called 'peak spreading' where peak periods are extended from, perhaps 30 minutes to two hours and more.

There is also an incentive for drivers to seek less congested routes that may be through residential and other unsuitable areas. However, in Caversham most routes towards Reading centre pass over Caversham and Reading bridges. Some drivers divert to the equally congested and unsuitable route via Sonning Bridge.

Peak spreading started to occur in Reading and Caversham many years ago and continues to worsen with natural growth and new developments. The implications for air quality, congestion, severance and economic viability within both Caversham centre and Reading are profound and troubling.



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Appendix II – CADRA Comments on site layout

Planning Application No. 210018 - Reading Golf Club, 7 Kidmore End Road, Emmer Green, Reading

The layout is not a reserved matter, so falls to be determined as part of this application.

This part of our comments is confined to the layout itself, without prejudice to CADRA's views on the principle of the development as a whole and on its wider impact. We wish to comment on three aspects of the layout: overall approach; the road hierarchy; and green corridors.

1. The overall approach

The Planning Statement says:

“6.13 The proposals also include a new road layout, including a primary spine road running from Kidmore End Road in the east to the western end of the site. The intent has been to provide a relatively traditional layout, served by a primary route with secondary roads that help to form a legible hierarchy. Cul-de-sacs and private drives with shared surfaces have been minimised but are used where appropriate to provide access to the dwellings that do not front directly onto the spine or secondary roads. “

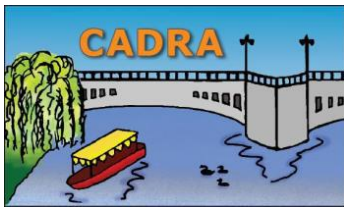
Sticking to this 'relatively traditional approach' is a regrettable missed opportunity for more innovative design in the layout. A site with great intrinsic qualities demands an exemplary and innovative design, but instead will become pretty much a standard and undistinguished suburban housing estate. The developers no doubt see this as responding, with minimum risk, to what the market demands, but it could be so much better. The one positive is perhaps the adoption of an 'Arts and Crafts' feel in the illustrated house types. This is a bit ironic in volume housebuilding but will give the area a more distinctive character than might otherwise be achieved.

2. The road hierarchy

The biggest missed opportunity in pursuing a 'traditional layout' is the failure to embrace current thinking on shared spaces and Home Zones and to settle instead for a hierarchy of primary and secondary routes and culs-de-sac. This is more 'car friendly' than it should be and risks increasing road dangers. But even taking this traditional approach at face value, we have strong reservations about how it has been applied here. Specifically, we feel that the road layout is unduly dominated by the primary road system.

The 'primary route' – presumably designed to 30mph standards? - extends far deeper into the site than it could or should do: it dominates the development and a one-sided loop of it forms the northern boundary. This over-extensive primary route has two impacts. First, 91 of the 199 family homes - 45% - front directly on to it, giving them a much lower standard of amenity than their neighbours which front secondary routes. Secondly, of these 199 family homes, only 39 can access the play area without crossing the primary route. This will impact on child safety and the usefulness of this play area to parents.

The present design may stem from the developer's wish to retain future development options, despite the proposal already over-topping the Local Plan allocation. If so, this should not be at the expense of the safety and amenity of this development's residents, which should be the prime concern of the planning decision. Instead, the transition from



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primary to secondary road should, in every instance, take place at the earliest opportunity, so that the primary route is much shorter, and the maximum possible number of homes benefit from a relatively traffic-free environment. The layout fails seriously to achieve this, and a radical re-think is needed in this respect.

We suggest that such a re-think should be fundamental, abandoning the 'traditional approach' in favour of something of altogether higher quality and incorporating more recent thinking on good housing layout.

However, even if this re-think continues to adhere to the traditional approach and to preserve the controversial strategic development link to the northern boundary, much could be done to improve the existing layout. The primary route could turn northwards rather earlier, to run east of the play area and connect with the eastern leg of the current 'loop' system to terminate at a turning arrangement on the northern boundary. The remainder of the primary loop serving the northern part of the site could then be deleted and replaced with secondary roads. Not only would this put the play area on the same side of this road as the large majority of houses, greatly improving child safety, but it would also allow a much larger proportion to be served by secondary roads rather than off the primary road.

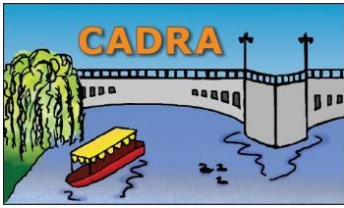
3. Green corridors

Policy EN12 of the Local Plan requires development to '*protect and wherever possible enhance features of biodiversity interest*' in new development. The ecological and landscape analyses submitted with the application address the 'protect' element of this requirement in extensive detail and conclude that as far as possible this is being achieved. However, we suggest an opportunity is being missed in relation to the 'enhance' aspiration.

This is illustrated on the Google Earth image **overleaf**. To the north of the site lie the retained woodlands on the balance of the golf course, linking westwards to the woodland and open spaces of Bug's Bottom, the Hemdean valley and the open Chilterns countryside beyond. To the east, in the established housing area between Kidmore End Road and Peppard Road, mature back garden trees form a wandering and continuous green network. This links with Clayfield Copse, across Peppard Road, which is an area of dense woodland of wildlife significance, linking in turn with the open countryside.

The site therefore has the potential to complete a major green link and wildlife corridor through Emmer Green, but the current layout fails to reach this potential by discontinuities in its planting corridors. With limited adjustment, and with little impact on housing numbers, we feel that development could be pulled away from either the northern/eastern or the southern/western boundary to enable a continuous band of denser, wildlife-friendly planting along the entire boundary, creating a wildlife corridor from Cucumber Wood to Clayfield Copse, and thus to the open countryside beyond each. This would not need to be particularly wide and would also benefit existing homes along the selected boundary.

See image overleaf



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