

**Caversham And District  
Residents Association**

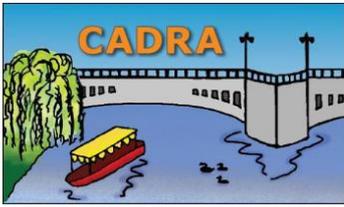
**CADRA Comments on Planning Application 211843**  
**Reading Golf Club - January 2022**

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### 1.0 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**

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.*

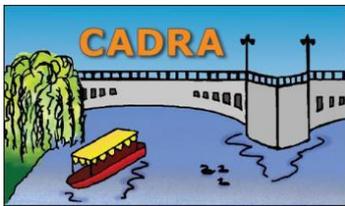
**This application is for 223 homes, without provision of sports facilities in Reading. CADRA considers that this application is contrary to the provisions of the recently adopted Reading Local Plan and urges rejection.**

### 2.0 Transport

The Local 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*

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. 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.

### 2.1 Assessment of traffic implications.

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.

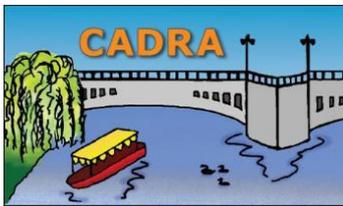
The problem of congestion through Caversham Centre is already widely accepted and quoted by Councillors, Officers and by Reading Buses. The delays from congestion impede a reliable public transport service offering a viable alternative to private car journeys and cause economic disadvantage for the town. 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.*

### 2.2 Peppard Road/Henley Road/Westfield Road/Prospect Street Junction

The developer previously offered to fund the installation of MOVA at this junction. MOVA (Microprocessor Optimised Vehicle Actuation) was originally designed to control traffic signals at isolated junctions. The offer appears to have been removed from this application in favour of an unspecified financial contribution, thus leaving the problem with the Council.

MOVA might have been used to link nearby signals but there are no others near this junction. MOVA optimises timings and minimises delays for a wide variety of traffic conditions including congested junctions. For some parts of



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the day, MOVA might improve traffic conditions. However, when the highway network is overloaded and exit blocking occurs, MOVA cannot reduce traffic queues at the junction or accommodate additional development traffic. Unfortunately, these are the periods when additional traffic, from the Reading Golf Course development, would arrive to seriously exacerbate the current queuing problem.

The developer has failed to acknowledge that exit blocking occurs and will remain in future years and, therefore, modelling of existing and future year queue lengths is incorrect. Long queues on Peppard Road approaching the junction occur routinely at this junction which has already exceeded capacity. This arises not only from the design of the junction but regularly from congestion towards the two bridges and across Reading towards the M4.

**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 of the Local Plan and Transport Plan.**

**Please refer to the detail in Appendix I**

### **2.3 Kidmore End Road**

This 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. This appears to have been ignored by the developer. 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 application proposes a new mini roundabout and pedestrian crossing but fails to address the integration with adjacent crossings and junctions.

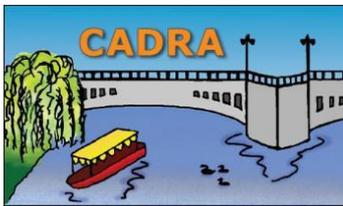
### **2.4 Peppard Road/Kiln Road/Caversham Park Road**

The lack of mitigation at this junction was listed as a reason for refusal of the previous application but no mention is made in the Temple report on Traffic and Transport. This is inconsistent with the Transport Assessment by Stantec, which predicts queuing and outlines a potential road widening.

## **3. 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.*



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

### 4. Internal Road Network and Open Space

A site of this quality demands the highest possible quality of layout and design if its use is ever to be justified. The revised application is no improvement in this respect and is every bit as much a missed opportunity as 210018. The layout proposed fails to embrace current thinking or to enhance green corridors.

We commented previously:

*“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 road layout is unduly dominated by the primary road system. Of the 204 family homes, three quarters cannot access the play area without crossing the primary route. This will impact on child safety and the usefulness of this play area to parents. Not only is the play area on the wrong side of the road, but it is directly overlooked by only three houses, all across the road and at some distance; it will become increasingly obscured as the planting develops; and it is located between the two SUDS water disposal areas. It is difficult to imagine a worse location for this facility.

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.

**Please refer to the detail in Appendix II**

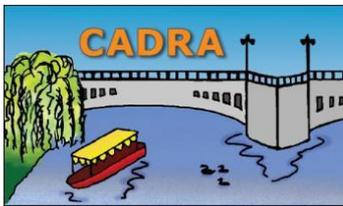
### 5. Landscape

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. It affords a sense of remoteness and tranquillity which is highly valued by the community.

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.

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 earlier 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*



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*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.*

In June 2021, Natural England announced a review of the AONB boundary with a view to its possible extension. Given the high landscape quality of the northern part of the Golf Club, and its importance to adjacent parts of Reading, CADRA feels there is a strong case for the review incorporating it into the AONB. The adverse impact of the proposed development would compromise the possibility of this well-deserved statutory protection.

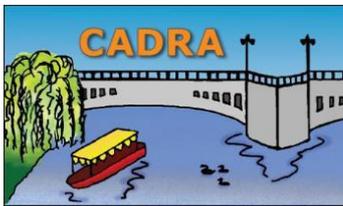
## 6. Biodiversity and Climate Change

The application proposes removal of 112 protected trees. 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 Landscape Management Plan, while welcome, makes no provision for ongoing funding.

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*

*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.*



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### 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 conditions<sup>12</sup>:*

#### *BIODIVERSITY AND THE GREEN NETWORK*

- Areas with potential for biodiversity value and which stitch the Green Network together ....existing 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.*

## 6.1 Green corridors

This application again fails to create the potential major green link and wildlife corridor through Emmer Green. See Appendix II.

## 7. Density and Mix

Arguments in favour of the plan, focus on the provision of family housing to counteract the number of urban flats envisaged in Reading. But the revised plan reduces the number of three- and four-bedroom houses for which there is significant local need.

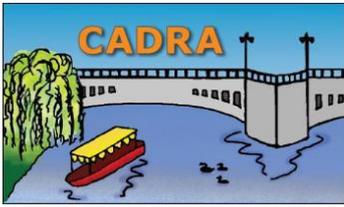
Affordable housing is reduced. Given market prices, it is doubtful whether this will in practice prove affordable in practice.

*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.

## 8. 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. It is notable that much of what was previously proposed within South Oxfordshire has been removed from this application.



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This application again includes some tree planting in South Oxfordshire. This fails to compensate for the loss of trees on the Reading section.

## **9. Conclusion**

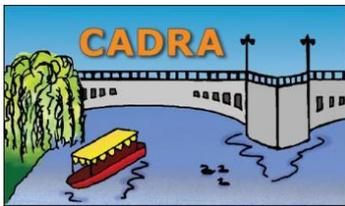
The proposal for a smaller development, as set out in the Local Plan was agreed after extensive and detailed consideration. While some changes have been made since the previous application 210018, the plans remain contrary to the Local Plan. Traffic issues are underestimated with little, or no mitigation provided. Even if these issues could be overcome, a site of this quality demands the highest possible quality of layout and design if its use is ever to be justified. Open spaces are limited and poorly designed, as is the layout and design. CADRA again urges refusal of this larger proposal which was considered for inclusion in the Local Plan and rejected.

**10 January 2022**

**See overleaf:**

**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. 211843 - 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.

### **Background**

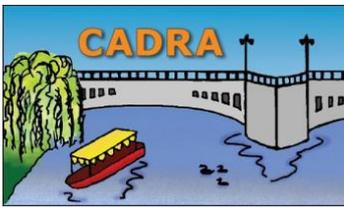
When considering the traffic impacts of their proposals, developers are frequently required to provide funding for highway improvements where development traffic would increase baseline flows by 5% or more. Calculation of opening year traffic flows includes growth in existing traffic, traffic generation 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.

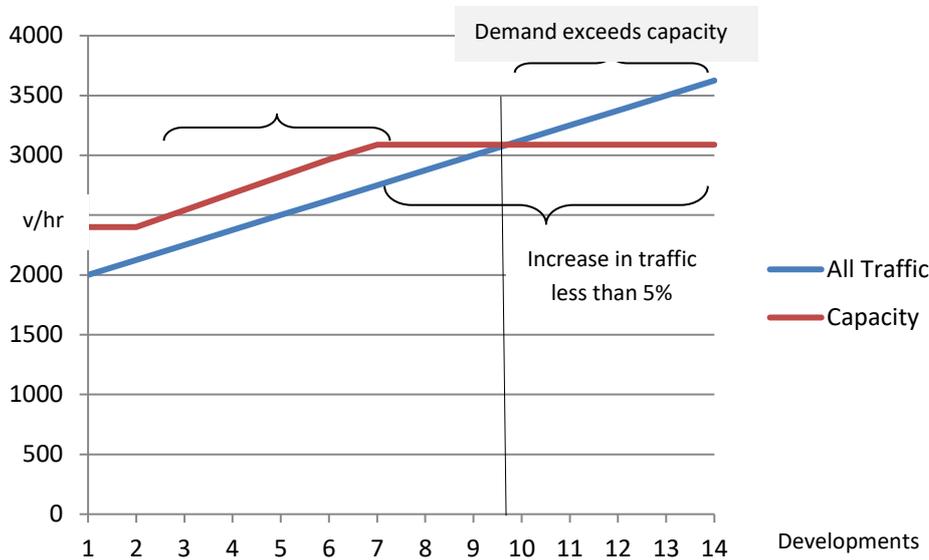
### **Cumulative impacts**

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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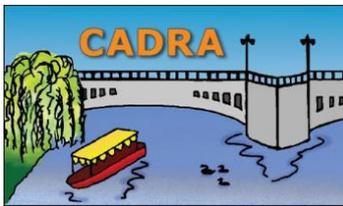
The simplified graph, below, demonstrates how cumulative effects of successive developments produce steadily worsening traffic conditions. In this example the first seven equal sized developments produced greater than a 5% increase in traffic flow and capacity enhancements were secured by the highway 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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## **Peppard Road/Henley Road/Westfield Road/Prospect Street Junction**

The developer previously offered to fund the installation of MOVA at this junction. MOVA (Microprocessor Optimised Vehicle Actuation) was originally designed to control traffic signals at isolated junctions. The Temple Report makes no mention of this junction in the Traffic and Transport Report while the Stantec Appendix states that *queues are predicted to increase with the junction operating very close to full capacity 100%* and *There are limited opportunities to deliver physical junction improvements due to space constraints.*

Whereas, in the previous application some mitigation was proposed, the developer now appears to pass the problem back to the Council with an unspecified financial contribution which might contribute to the installation of MOVA.

MOVA can now be used to link nearby signals but there are no others near this junction. MOVA optimises timings and minimises delays for a wide variety of traffic conditions including congested junctions.

For some parts of the day, MOVA might improve traffic conditions. However, when the highway network is overloaded and exit blocking occurs, MOVA cannot reduce traffic queues at the junction or accommodate additional development traffic. Unfortunately, these are the periods when additional traffic, from the Reading Golf Course development, would arrive to seriously exacerbate the current queuing problem. The developer has failed to acknowledge that exit blocking occurs and will remain in future years and, therefore, modelling of existing and future year queue lengths is incorrect.

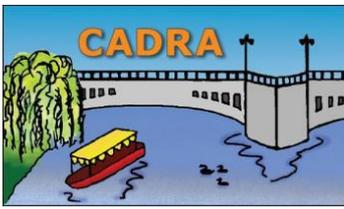
## **Conclusion**

**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.**

**The developer has failed to acknowledge or demonstrate that the development of Reading Golf Club would not place further pressures on transport within Emmer Green, Caversham and Reading. Indeed, a passing examination of the highway network leads quickly to the conclusion that any major development would have a serious detrimental impact on Emmer Green, Caversham and Reading.**

**The granting of planning for the development of Reading Golf Club would send a strong, but incorrect, message to potential developers in South Oxfordshire that residential developments might have an acceptably low impact on the town of Reading. Approval of this development would provide a mandate for more intensive developments within South Oxfordshire without the need to consider mitigating measures or improvements to the highway network**

**Therefore, CADRA strongly objects to the redevelopment of Reading Golf Club and the application should be refused in its entirety.**



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## **Appendix II – CADRA Comments on site layout**

### **Planning Application No. 211843 - 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.

Without prejudice to our views on the principle of developing this site, these comments focus on the proposed layout should such development proceed.

#### **1. The overall approach**

A site of this quality demands the highest possible quality of layout and design if its use is ever to be justified. We see this as a fundamental test.

The revised application is no improvement in this respect and is every bit as much a missed opportunity as 210018, on which we commented:

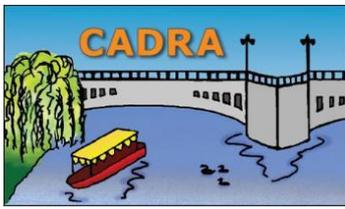
*“A site with great intrinsic qualities demands an exemplary and innovative design, but instead will become pretty much a standard and undistinguished suburban housing estate.”*

We were critical of the fundamental design aim set out at para 6.13 of the 210018 Planning Statement, which reappears verbatim at 7.10 of the present Planning Statement:

*“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. “*

It is this lack of design ambition which lies at the heart of our objection: a 'relatively traditional layout' is a missed opportunity and, by creating no more than a standard speculative suburban development, fails the fundamental test we suggest above. As before, it fails to embrace current thinking on shared spaces and Home Zones and settles 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.

Even if this traditional approach is accepted, 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.



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### 2. The road layout and play area

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**, we estimate that 76 of the 204 family homes - 37% - front directly on to it, giving them a much lower standard of amenity than their neighbours which front secondary routes. This is a slight improvement on the previous application, resulting partly from the replacement of the health centre with more houses off the main road.

**Secondly**, of these 204 family homes, three quarters cannot access the play area without crossing the primary route. This will impact on child safety and the usefulness of this play area to parents. Not only is the play area on the wrong side of the road, but it is directly overlooked by only three houses, all across the road and at some distance; it will become increasingly obscured as the planting develops; and it is located between the two SUDS water disposal areas. It is difficult to imagine a worse location for this facility.

All these issues appear to stem from the developer's wish to retain future development options by carrying the development road to the northern end of the site, despite the proposal already over-topping the Local Plan allocation. If this is the reason, it 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 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.

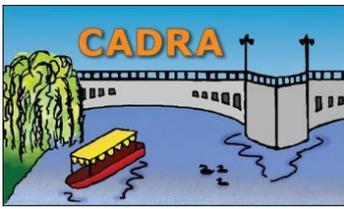
We suggest that such a rethink should be fundamental, abandoning the 'traditional approach' in favour of something of altogether higher quality and incorporating more recent thinking on good housing layout.

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

We make exactly the same comment as we did for 210018.

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.



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This is illustrated on the Google Earth image below. 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.

