



Reading Golf Club application 211843

Planning Applications Committee 2 March 2022

CADRA Summary for PAC Members

We urge refusal of this application because:

- The previous application included 4.4 ha of off-site open space, yet a key reason for its refusal was loss of open space. This application is much worse, abandoning off-site provision entirely and offering inadequate on-site substitutes. It is perverse to recommend it for approval.
- Even with the slight reduction in numbers, this application substantially overtops the recent Local Plan allocation. This will exacerbate the already-unacceptable congestion in central Caversham, but this has not even been considered.
- The justifications offered for this total reversal of RBC's position, and its over-riding of the recent Local Plan, seem to be small changes in the scheme and a modest addition to open space within it, a list of 106 aspirations, and the difficulties in which the Golf Club has put itself. These combine inadequate planning reasons with issues which are not valid planning considerations.

We call on RBC to be consistent with its previous decision and with its own Local Plan and refuse this application. These and other fundamental concerns are set out in this note, using RBC's five previous reasons for refusal.

1. Loss of significant part of undesignated open space and failure to replace at the same standard

The landscape and infrastructure issues identified in the Local Plan remain valid concerns and should be applied consistently to this application. Open space remains a fundamental issue: para 6.2.25 recognises that **the footprint of the development is the same**, so the issue of lost open space remains the same and it is difficult to see why the decision should be reversed.

In fact, the new application is worse in this respect. Its predecessor included 4.4 ha of off-site replacement open space, yet RBC determined that, even with that substantial provision, the application should be refused because of loss of open space. Para 6.2.29 now concludes that this 4.4 ha could not be guaranteed and comes to the odd

conclusion that just 0.56 ha of extra open space within the site – just one-eighth of the previous area and only about two-thirds of a soccer pitch – is sufficient to offset this loss. The enhancements to facilities elsewhere, mentioned in 6.2.12 do nothing to compensate for such losses in the overall total of open space.

As RBC's Natural Environment Officer comments, the open space within the site includes some small areas and thin strips of land of questionable usefulness to residents. The play area is across the main road from most houses, secluded by trees - contrary to advice from Thames Valley Police – and situated between two SUDS, raising concerns for safety, security and ASB. Yet this limited and unsafe provision is deemed adequate to reverse the decision. We see no logic in this drastic reversal: if the previous application was unacceptable on open space grounds, this one is much worse.

Para 6.1.4 confirms that, like its predecessor, the application remains 'significantly larger' than the Local Plan allocation CA1b and is not supported by that policy 6.1.6. It then appears to argue that the Local Plan should be overruled, and the application decided 'on its merits', because the Golf Club committed itself to moving ahead of securing planning permission and could no longer make its deal stack up if confined to the original allocation. We submit strongly that this is neither a material planning consideration nor a valid reason for over-ruling a properly adopted Local Plan. The Golf Club was aware of the risks and hence continually criticised the Local Plan.

2. Poor layout and lack of 'green link'

We accept that the amended layout reduces the proportion of houses fronting the spine road. However, the play area remains in just about the worst position which could be conceived for it – see above.

The refusal notice referred to the lack of a 'continuous green link', echoing both our previous comments and Local Plan Policy EN12 - that this should run right through the site, linking with countryside at either end. We dispute the claim that this has now been remedied, for two reasons. First, the section running north-south, along the eastern boundary, is there to accommodate SUDS arrangements and amenity uses and is severed by buildings to the south. It seems unlikely to provide the species-rich environment needed for a true 'green link'. Secondly, the eastern section of the layout misses the opportunity for a link to the east by providing just a single row of trees.

3. Local highway impact

Section 6.8 on Transport focuses virtually entirely on managing traffic in the immediate surrounds of the development. It pays no regard to the acute congestion in central Caversham, approaching the two bridges, which causes delay, disruption, loss of amenity and particularly poor air quality for schools and for the whole community.

We urge that ANY development over and above Local Plan allocations should be resisted for this reason. The **cumulative** traffic impact of successive developments in Caversham should be considered: each may demonstrate that its impact is negligible, but together they increase already-serious problems of congestion, amenity and health issues. The additional 100+ homes proposed beyond policy CA1b would be the biggest contributor to this cumulative growth for many years. And this is very clearly a car dominated development.

Congestion spreads across Caversham and as recognised in the Draft LTP - *“Bus journey times are unreliable as a result of the congestion, making public transport an unattractive option.”* If this continuing downward spiral is to be halted, the suggested s106 payment to local bus services should apply more widely.

We explained in our full comments the issues with road junctions, but this is not referenced in the officer report. The proposed changes to the Kiln Road and, in particular, the Peppard Road/Henley Road/Prospect Street junction will have little or no benefit. The MOVA system is designed to link traffic lights and there are none to link to. And when Prospect Street is at a standstill, however good the junction, queues will build up Peppard Road where pollution gathers in the valley causing severe health issues. To have any impact, a far more ambitious scheme would be required.

The proposed herringbone surface for pedestrian crossings has been shown to erode after a few years. A more robust and long-lasting solution is needed to avoid pressures on Council funding at a later date.

4. Loss of biodiversity with no exceptional justification

We are concerned that the mainly desk top analysis by Temple fails to recognise the local conditions which are well described by the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT). Surprisingly the BBOWT comments are not referenced in the report. The Temple assessment of a gain of just 1.7% to 4.4% may therefore be overstated so that the scheme relies primarily on offsite mitigation, contrary to NPPF.

5. Climate change impacts

We leave comments to others.

6. Lack of s 106

However beneficial the proposed s106 might be, financially, it cannot overcome the basic fact that the previous application was refused on valid policy grounds, that those policies still apply and that the present application does not vary in its fundamentals. We note that the ‘deadline’ for concluding the s106 can be relaxed at officers’ discretion, suggesting it is far from negotiated. It would be entirely inconsistent to refuse the previous application and grant this one.