

READING BOROUGH LOCAL PLAN EXAMINATION

CAVERSHAM AND EMMER GREEN

Reading Borough Council response to Issue 13:

Are the policies for Caversham and Emmer Green justified, deliverable and consistent with national policy?



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Q1. Is the strategy for the Caversham and Emmer Green justified? Does the strategy appropriately reflect the concerns relating to infrastructure as set out in paragraph 8.2.5 of the LP?

The strategy for Caversham and Emmer Green is justified. The reasoning for the strategy is generally set out within the text of the Local Plan itself.

The level of development planned for the area stems from the assessment of capacity undertaken in the Housing and Economic Land Availability Assessment (HELAA, EV014 and EV015). This considered that the area could accommodate approximately 700 homes between 2013 and 2036, around 5% of the total planned for, but very little commercial development, as identified in paragraph 8.2.3 of the Local Plan.

Caversham and Emmer Green has the lowest potential for additional development of the five areas. It is an existing residential area (with the exception of the small centres and some small concentrations of industry), where the opportunities for development even on previously-developed sites are very limited. There is some greenfield land within the area, but most of this is important for its recreation, landscape or historic value and should be protected. Much of the edge of this area adjoins the Chilterns Area of Outstanding Natural Beauty. There is also heritage interest, in particular associated with the history of the area as villages and hamlets in their own right, separate from Reading.

The infrastructure concerns set out in paragraph 8.2.5 are further underlined in representations from those within the local area, particularly on the Reading Golf Club site, with transport, education and healthcare predominating. The Caversham and Emmer Green section seeks to address this to some extent, for instance through securing primary healthcare provision as part of the Reading Golf Club development. However, in some case, these concerns need to be addressed across the wider Reading area rather than specifically in the strategy for this area. For instance, the provision of additional crossing capacity of the Thames, mainly in South Oxfordshire and Wokingham, but making up part of policy TR2, would help to alleviate the congestion issues which the two existing bridges and Caversham District Centre face, and might allow for some reconsideration of how space on those central bridges is allocated between the private car and public transport. Provision of park and ride on three corridors north of the Thames, as also sought under policy TR2m would also help to address these issues.

In terms of education, there are proposals for a new secondary school close to the town centre, which would be accessible from much of Caversham, as well as some additional capacity at Highdown School in Emmer Green and Chiltern Edge at Sonning Common in South Oxfordshire (for the latter please see Appendix 15 of the Duty to Co-operate Statement, EV001). These measures were set out in a report to Policy Committee on 11th June 2018. The Council also recently resolved to grant permission for a primary school¹ on part of Mapledurham Playing Fields, subject to call-in by the Secretary of State and completion of a Section 106 agreement.

¹ This is not an entirely new school, as the free school currently operates from a temporary site in Caversham.

SITE ALLOCATIONS - CAVERSHAM AND EMMER GREEN

Q2. Having regard to the effect on flood risk and the requirement for the relocation of the Boat Club, is Policy CA1a justified?

Policy CA1a is justified. As for other site allocations, CR1a has been considered through the Housing and Economic Land Availability Assessment (EV014 & EV015), with the site corresponding to HELAA site reference CA006.

In terms of flood risk, the site has been considered through the Sequential and Exception Test process, as set out in EV028 (see particularly p103-105). This shows that, whilst the southern part of the site including the current boat club building is within Flood Zone 3 and partially within the functional floodplain, the northern part is within Flood Zone 2. The document demonstrates that the sequential test is passed. The Level 2 SFRA for the site (EV026) is however only able to demonstrate that the site can be developed safely, which allows the Exception Test to be passed, if development is restricted to the land within Flood Zone 2. It is not considered that this makes delivery of the site unlikely. The northern part of the site contains the road frontage and access and is closer to the district centre, and a development of the northern part of the site would reflect the neighbouring site to the west, and is therefore a logical solution. Flood risk is not therefore considered to prevent allocation of the site.

In terms of relocation, the policy has been amended at Submission stage to make clear that an alternative to relocation could be demonstrated that its loss is justified in terms of national or local policy, so relocation is not the only possible outcome. However, if relocation is required, previous representations by the landowners, the University of Reading, at Draft Local Plan stage, have demonstrated that this is likely to be deliverable.

“It is recognised that to develop a greater proportion of the site would likely require Reading Boat Club to find an alternative suitable location. We consider that such a location is available, within the University’s ownership, which has a planning history (F/2012/2307) including a now lapsed previous planning consent for use as a boat club. This alternative site is the Dreadnought site on the banks of the River Thames, located north of Thames Valley Park Drive, to the west of Microsoft UK Headquarters.”

The Dreadnought site is within Wokingham Borough, and therefore its continued suitability is not within the Council’s control, but the past permission and the fact that this part of the Thames riverside is an established location for use of the river for boats and canoes, means that it is likely to continue to be deliverable. The potential relocation of the boat club is not therefore considered to represent sufficient risk to delivery to prevent allocation of the site.

Q3. Is Policy CA1b justified and consistent with other policies within the LP? Are the site requirements justified by robust evidence? What evidence is there to indicate the future of the golf course will be secured within South Oxfordshire?

Policy CA1b is justified. As for other site allocations, CR1b has been considered through the Housing and Economic Land Availability Assessment (EV014 & EV015), with the site corresponding to HELAA site reference PE002. This process highlighted a number of the issues that then fed into requirements of CA1b, such as the need for development to take account of trees protected by Tree Preservation Order, the recognition of local issues of primary healthcare capacity as raised in many of the representations, and the need for potential upgrades to water and wastewater infrastructure, recognised by Thames Water in their representations. Meanwhile, the site is identified as being part of a Green Link linking the wider Chilterns Hills with Clayfield Copse and Emmer Green Recreation Ground and areas of wildlife significance beyond (see Map 2 of Appendix 2 of the Local Plan Background Paper, EV002). The potential for archaeological finds was highlighted by the Council's consultants, Berkshire Archaeology, which provided the following advice as the Local Plan was drafted in March 2017:

"An area of archaeological interest, associated with crop marks and an Iron Age site - interpreted as a barrow cemetery. Depending on scale of the build, may require pre-application archaeological works to inform mitigation."

The allocation is consistent with other policies in the Local Plan. In terms of consistency with other policies, section 3.8 of the Local Plan Background Paper (EV002) looks at the internal consistency of the plan, and explores possible issues in more detail. Point 17 on the relationship with policies that protect open space is of particular relevance to this site. Whilst the site does represent open land, it is not publicly accessible, not particularly visible from public areas, and has no special significance in its own right. With the scale of housing need identified, there is not considered to be adequate reason to protect this area of land.

Regarding the ability to secure additional land in South Oxfordshire to replace the holes lost through development, the Council has not specifically identified any particular land where this could take place, and nor has Reading Golf Club informed the Council of any particular possibilities. There is substantial existing agricultural land adjoining the golf course to the north, north west and north east that would be more than adequate in terms of space, but the potential availability of any of this land is unknown. In terms of planning constraints, the Council has raised this issue during duty to co-operate discussions with South Oxfordshire District Council, for instance during the meetings on 26th May 2016 and 4th October 2017, and have been informed that there would be no in-principle policy objection to use of adjoining land as part of a golf course, but that it would naturally need to be assessed on its merits.

However, the Council's understanding is that it is currently the intention of Reading Golf Club to dispose of the entire golf course as a potential development opportunity, rather than to progress the proposed allocation in CA1b. As a result,

the entire golf course has recently been marketed. This proposal has not been formally presented to the Council, either through the pre-application or planning application process or through a nomination to or representation on the Local Plan. The situation with the Golf Club is slightly unusual, in that its decisions are made in consultation with the membership, many of whom are local residents. This means that decisions and discussions that in another organisation would be entirely internal may become widely known before they are formally agreed.

A proposal for development of the full golf course, the largest part of which is within South Oxfordshire, would be a very different proposal and would require full consideration through the Local Plan process and significant cross-boundary working. There is no current information to demonstrate that this would be acceptable. The conclusion of the Sustainability Appraisal was that an option for development of the full site resulted in negative effects on access to leisure, as well as accentuated effects on healthcare and education services. These, among others, are issues that a proposal for use of the whole golf course, were it to be made, would need to address.

Q4. Are the requirements for Policy CA1d justified?

The requirements for policy CA1d, Rear of 200-214 Henley Road, 12-24 All Hallows Road and 4, 7 and 8 Copse Avenue, arise largely from the HELAA process, as this is the means through which the site allocations have been assessed. The justification for each requirement is summarised below:

- Access: Overton Drive forms an obvious point of access, which appears to have been designed with the potential to service additional land in mind. Other potential accesses would potentially involve the loss of a house, and in the case of Henley Road would form a new access on a classified road, contrary to policy TR3.
- Trees: there is one tree protected by TPO on the edge of the site, but there are other mature trees within gardens that contribute to the character of the area.
- Biodiversity and green link: these requirements are consistent with policy EN12 of the Local Plan, which included identifying a green link between the copse at Micklands Primary school and the areas south of Henley Road.
- Archaeology: the Council's consultants, Berkshire Archaeology, provided comments on emerging site allocations in March 2017, and stated that this development "may require archaeological work, due to archaeological potential in the area (dependent on scale of proposals and anticipated impact)".

To provide more detail, there is potential for prehistoric archaeology in that area, as demonstrated by a scattering of finds on the Historic Environment Record - including a Palaeolithic (Old Stone Age) hand axe, Bronze Age and Iron Age pottery, flint flakes and a Roman coin. Artefacts are known to have been retrieved from the gravel pit a short distance to the west (and also a mammoth tooth and tusk). None of these will have occurred in isolation,

and features associated with the finds are also likely. These tend to survive well in gardens, and sometimes at depth below extant buildings (dependent on the geology - eg stone artefacts within the gravel).

- Air quality: the Air Quality Management Area (AQMA) covers part of the southern portion of the site. The reference here is therefore in line with any other allocations which are wholly or partly within the AQMA.
- Contamination: according to the Council's records, an area of land to the north of Overton Drive which coincides with part of the northern portion of the site is a potential source of contamination related to a historic gravel pit use. This would require further consideration at application stage.
- Back-to-back separation: this is consistent with policy CC8, and is specifically of note here because the rear of 2-5 Overton Drive is currently very close to the site boundary.

Q5. Having regard to the historic environment is Policy CA2 justified and will it be effective?

Policy CA2 is justified, and, as for other potential sites, this has been considered through the HELAA process. Unsurprisingly, given the listed status of the main house and some other structures, and the fact that it constitutes a registered historic garden, the historic environment has emerged as the most significant issue for this site. In summary, the main historic significance is as follows:

- Caversham Park is a Grade II listed historic garden. The description in the listing is as follows: "A country house with the remains of an early C18 formal garden by Stephen Switzer flanking mid C19 formal terraces, surrounded by the remains of a landscape park laid out in the 1760s by Lancelot Brown."
- Caversham Park House, the main building on the site, is a Grade II listed manor house, and was rebuilt after a fire in 1850.
- The inner park walls, walls at the former kitchen garden, entrance gates and gate piers and a temple to the west of the park are all Grade II listed structures.

The site was previously in use by the BBC for its Monitoring Service, but the site was put on the market in June 2017, and currently appears to be under offer.

Policy CA2 merely reflects and underlines this historic significance, and clearly states that the assets will be conserved and that any conversion of Caversham Park House will need to sustain the significance of the listed building. There is considered to be a reasonable prospect that the building will be capable of conversion to flats, or potentially another use. As it has long since ceased to be in its original use, it is not thought to currently be in an unaltered state, and the landowners undertook some initial work on the potential for conversion as part of pre-application discussions which gave an indication of the possible amount of dwellings identified in the policy, albeit that this would have needed full consideration. The allocation is careful in the way it describes the potential

conversion of the building, and that the potential to provide 40-45 dwellings is an estimate that will be dependent on a more detailed assessment of the building which the Council is not in a position to carry out as part of the Local Plan process. The building has long since ceased to be in its original use.

It is considered that the policy is effective, in that it is capable of delivery. The site has been on the market, and it is understood that it is under offer, so is likely to be available. There are no known reasons why the policy would not be capable of delivery. Other than opening up some public access, the wording of the policy does not place any additional restrictions on the site than would have existed anyway, as the heritage significance, presence of important trees, biodiversity and landscape significance would have had to be dealt with even if CA2 were not in place. The policy in itself does not rule out additional development, were this to be required to ensure viability, but rather states that it is not positively advocated by the policy in advance of more detailed assessment of matters such as heritage. It is therefore considered that the policy will be effective.